Report on the activities of Bank Pekao S.A. Group for the year 2025

(prepared jointly with the Report on the activities of Bank Pekao S.A.)

This document is not an official version of Report on the activities of Bank Pekao S.A. Group for the year 2025. In case of any doubt or discrepancy, the official version of Report on the activities of Bank Pekao S.A. Group for the year 2025 prepared in accordance with the requirements of the ESEF and available on the Bank's website shall prevail.

This document is a free translation of the Polish original. Terminology current in Anglo-Saxon countries has been used where practicable for the purposes of this translation in order to aid understanding. The binding Polish original should be referred to in matters of interpretation.

Warsaw, February 2026

1. **Highlights of Bank Pekao S.A. Group** 3
2. **Highlights of Bank Pekao S.A.** 4
3. **Highlights and Summary of Performance** 5
4. **External Activity Conditions** 7
4.1 Important factors influencing the Group's activities and results 11
5. **Organizational Structure** 12
5.1 Changes in the Bank Pekao S.A. Group 12
5.2 Changes in the Statutory Bodies of the Bank 13
5.3 Organizational changes 14
6. **Information for the Investors** 15
6.1 The Bank's share capital and share ownership structure 15
6.2 Performance of market valuation of Bank Pekao S.A.'s stock 16
6.3 Dividend payment history 17
6.4 Investor Relations 17
6.5 Financial credibility ratings 17
7. **Activity of Bank Pekao S.A. Group** 19
7.1 Bank Pekao S.A. on the Polish banking market 19
Retail Banking And Private Banking **22**
Enterprise Banking **28**
Corporate And Investment Banking **29**
7.2 Major areas of activities of the Group's subsidiaries 34
Summary of companies' financial results **34**
Business activities of selected companies **34**
7.3 Awards and distinctions 37
7.4 Investing in human capital 39
7.5 Sponsorship and charity policy 46
7.6 Major sources of risk and threats 48
7.7 Capital adequacy 52
8. **Prospects for Development** 54
8.1 Strategic directions and business priorities 54
8.2 Factors which will affect the results of the Group 58
9. **Statement of Financial Position and Financial Results** 60
9.1 The consolidated income statement – presentation form 60
9.2 Structure of the consolidated statement of financial position – short form 64
10. **Separate Statement of Financial Position and Financial Results** 69
10.1 The Separate income statement – presentation form 69
10.2 Structure of the separate statement of financial position – short form 72
11. **Other Information** 76
12. **Statement of Bank Polska Kasa Opieki Spółka Akcyjna on the application of corporate governance principles in 2025** 82
13. **Sustainability Statement of the Bank Pekao S.A. Group for 2025** 111
13.1 General information 111
13.1.1 Basis for preparation of the Sustainability Statement [BP-1] [BP-2] 111
13.1.2 Corporate governance 113
13.1.3 Bank's Strategy 121
13.1.4 Managing Impacts, risks and opportunities 144
13.2 Environmental information – climate change [ESRS E-1] 159
13.2.1 Managing impacts, risks and opportunities 159
13.2.2 Metrics and targets 173
13.2.3 EU Taxonomy 180
13.3 Information relating to social matters 294
13.3.1 Own workforce [ESRS S1] 294
13.3.2 Consumers and end-users [ESRS S4] 313
13.4 Corporate governance-related information – business conduct [ESRS G1] 330
13.4.1 Managing impacts, risks and opportunities 330
13.4.2 Metrics and targets 340

1. Highlights of Bank Pekao S.A. Group

	2025	2024	2023	2022	2021	2020
INCOME STATEMENT – SELECTED ITEMS						*(in PLN million)*
Operating income	17,165	16,049	15,200	10,664	8,522	7,796
Operating costs	(5,530)	(5,244)	(4,631)	(3,987)	(3,739)	(3,451)
Profit before income tax	8,961	8,123	8,565	2,882	3,002	1,725
Net profit attributable to equity holders of the Bank	7,015	6,376	6,659	1,717	2,175	1,102
PROFITABILITY RATIOS						
Return on average equity (ROE) – nominally	21.4%	21.2%	25.0%	7.6%	8.7%	4.5%
Return on assets (ROA)	2.1%	2.0%	2.2%	0.6%	0.9%	0.5%
Net interest margin	4.2%	4.2%	4.2%	3.3%	2.4%	2.5%
Cost / income (including to contributions to the BFG)	34.5%	34.2%	31.7%	44.4%	47.3%	49.2%
Costs of risk	0.39%	0.48%	0.36%	1.12%	0.45%	0.99%
STATEMENT OF FINANCIAL POSITION – SELECTED ITEMS						*(in PLN million)*
Total assets	352,233	334,242	305,789	281,139	250,567	233,217
Customers' financing(*)	197,343	182,158	171,140	167,509	169,073	151,684
Amounts due to customers(**)	268,463	259,034	232,078	209,596	194,804	177,745
Debt securities issued	20,265	16,167	9,958	10,337	5,355	6,147
Subordinated liabilities	5,642	2,782	2,781	2,789	2,762	2,758
Equity	35,362	31,914	30,428	22,774	23,863	25,495
STATEMENT OF FINANCIAL POSITION STRUCTURE RATIOS						
Customers' financing (*) / total assets	56.0%	54.5%	56.0%	59.6%	67.5%	65.0%
Securities / total assets	34.8%	35.8%	32.7%	25.3%	22.9%	26.7%
Deposits (***) / total assets	83.6%	83.2%	80.1%	79.2%	81.0%	80.0%
Customers' financing (*) / deposits (***)	67.0%	65.5%	69.9%	75.2%	83.3%	81.3%
Equity / total assets	10.0%	9.5%	10.0%	8.1%	9.5%	10.9%
Total capital ratio	16.4%	16.8%	17.5%	17.8%	17.7%	19.2%
EMPLOYEES AND NETWORK						
Total number of employees	14,911	15,212	14,922	14,443	14,429	14,984
Number of outlets	560	573	574	597	650	713
Number of ATMs	1,363	1,314	1,306	1,328	1,475	1,592

(*) Including net investments in financial leases to customers, non-treasury debt securities and excluding reverse repo transactions.

(**) Excluding repo transactions.

(***) Deposits include amounts due to customers, debt securities issued and subordinated liabilities.

(****) Data for December 31, 2024 have been recalculated taking into account the retrospective recognition of part of the profit for 2024 (after confirmation of the financial results by the General Shareholders Meeting), in accordance with the EBA position expressed in Q&A 2018_3822 and Q&A 2018_4085.

2. Highlights of Bank Pekao S.A.

	2025	2024	2023	2022	2021	2020
INCOME STATEMENT – SELECTED ITEMS						*(in PLN million)*
Operating income	16,318	15,290	14,657	10,320	8,084	7,454
Operating costs	(5,083)	(4,794)	(4,230)	(3,658)	(3,438)	(3,169)
Profit before income tax	8,739	8,105	8,643	3,012	2,995	1,697
Net profit	6,922	6,425	6,799	1,898	2,237	1,126
PROFITABILITY RATIOS						
Return on average equity (ROE) - nominally	21.4%	21.7%	26.0%	8.7%	9.2%	4.8%
Return on assets (ROA)	2.1%	2.1%	2.4%	0.73%	0.9%	0.5%
Net interest margin	4.2%	4.2%	4.3%	3.3%	2.4%	2.5%
Cost / income (including to contributions to the BFG cost and fee paid for the Protection Schemes)	33.5%	32.9%	30.1%	42.7%	46.1%	47.6%
Costs of risk	0.34%	0.38%	0.32%	1.12%	0.41%	1.03%
STATEMENT OF FINANCIAL POSITION – SELECTED ITEMS						*(in PLN million)*
Total assets	337,858	319,251	294,552	271,703	241,275	222,381
Customers' financing(*)	179,485	165,435	157,406	155,477	157,783	139,926
Amounts due to customers(**)	268,834	259,523	232,307	209,803	195,064	178,276
Debt securities issued	10,006	6,542	4,078	5,894	178	523
Subordinated liabilities	5,642	2,782	2,781	2,789	2,762	2,758
Equity	34,855	31,516	29,987	22,189	23,100	24,647
STATEMENT OF FINANCIAL POSITION STRUCTURE RATIOS						
Customers' financing (*) / total assets	53.1%	51.8%	53.4%	57.2%	65.4%	62.9%
Securities / total assets	37.0%	37.9%	34.5%	26.8%	24.2%	28.2%
Deposits (***) / total assets	84.2%	84.2%	81.2%	80.4%	82.1%	81.6%
Customers' financing (*) / deposits (***)	63.1%	61.5%	65.8%	71.2%	79.7%	77.1%
Equity / total assets	10.3%	9.9%	10.2%	8.2%	9.6%	11.1%
Total capital ratio (****)	18.7%	19.3%	20.1%	19.9%	19.6%	21.3%
EMPLOYEES AND NETWORK						
Total number of employees (*****)	13,765	12,626	12,470	12,234	12,400	12,866
Number of outlets	560	573	574	597	650	713
Number of ATMs	1,363	1,314	1,306	1,328	1,475	1,592

(*) Including non-treasury debt securities and excluding reverse repo transactions.

(**) Excluding repo transactions.

(***) Deposits include amounts due to customers, debt securities issued and subordinated liabilities.

(****) Data for December 31, 2024 have been recalculated taking into account the retrospective recognition of part of the profit for 2024 (after confirmation of the financial results by the General Shareholders Meeting), in accordance with the EBA position expressed in Q&A 2018_3822 and Q&A 2018_4085.

(*****) The increase in employment results from the consolidation of customer contact channels within the Group - the Bank's takeover of Pekao Direct employees under Article 231 of the Labor Code.

3. Highlights and Summary of Performance

Key Initiatives

New strategy for 2025-2027

We have announced the "… the only way is up!" " strategy for 2025-2027. The strategy is based on three pillars: **Growth, Accessibility** and **Efficiency**. The key objectives include achieving an ROE greater than 18%, a C/I ratio lower than 35%, a cost of risk in the range of 65-75 bps and maintaining a dividend payout policy of 50-75% of profit.

Strong capital position and financial stability

We have maintained a strong capital position thanks to effective capital management and the use of modern financial instruments. Once again, we were among the most resilient institutions in Europe in the EBA's stress tests, confirming our financial stability.

Green bond issuance

We issued EUR 500 million worth of green Eurobonds, strengthening our position on the international capital market. We used the funds raised to ESG-compliant projects, including blue initiatives supporting environmental sustainability.

Continuation of work on the reorganization of the PZU Group and Pekao

We signed an annex to the Term Sheet with PZU, which extended the deadline for completing the PZU Group's reorganization until December 2027 in order to adapt the schedule to the legislative process. The reorganization aims to simplify the group's structure, increase efficiency and integrate key business areas. We cooperated with PZU, focusing on achieving strategic goals and ensuring benefits for clients and shareholders.

Developing the offer for customers

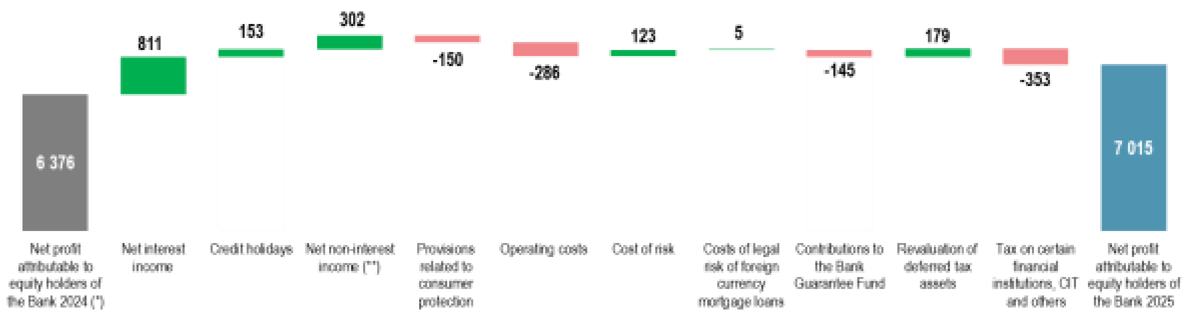
We increased our commercial activities, actively supported our clients in maintaining financial liquidity, and continued to digitize and automate processes by implementing advanced digital solutions. We have also expanded our product offer, responding to the needs of both individual and business customers. We opened 497.5 thousand Kont Przekorzystnych and Świat Premium Accounts, including 172.5 thousand for clients up to 26 years of age, which constitutes 35% of accounts. The number of active mobile banking customers increased by 294 thousand to 3.7 million, i.e. +9% more than a year ago and +19% more than two years ago. We have extended a special offer for individual and corporate customers from Ukraine.

Main P&L items

In 2025, the net profit of the Bank Pekao S.A. Group attributable to the Bank's shareholders amounted to PLN 7,015 million and was higher by PLN 639 million, i.e. 10.0% compared to the result achieved in 2024. This was the highest result achieved in the Group's operations to date.

The results of 2025 include the establishment of provisions for consumer protection matters in the amount of PLN -202 million net, higher by PLN 150 million y/y, and the revaluation of deferred tax assets, with a positive impact on net profit in the amount of PLN 179 million.

The ROE ratio was at the level of 21.4%.



(*) the 2024 results include the costs of credit holidays in the amount of PLN 153 million.

(**) excluding the cost of consumer protection provisions.

The Group’s operating income in 2025 amounted to PLN 17,165 million and was 7.0% higher than in 2024, mainly due to net interest income and net fee and commission income, which was driven by volume increases and increased customer activity.

- Net interest income in 2025 amounted to PLN 13,693 million and was higher by PLN 964 million, i.e. 7.6%, compared to the result achieved in 2024, mainly due to higher volumes, especially in strategic product areas and higher interest margin, with continued high liquidity and lower costs of deposits. The 2024 results include the costs of credit holidays in the amount of PLN 153 million.
- Net fee and commission income generated in 2025 amounted to PLN 3,154 million and was higher by PLN 300 million, i.e. 10.5% compared to the result achieved in 2024, thanks to increases in all areas of the Group's operations, which was driven by growing customer activity and a favourable situation on the capital markets.

Operating expenses in 2025 amounted to PLN 5,530 million and were higher by PLN 286 million, i.e. 5.5% compared to 2024, supporting business development, with the costs of salaries and other employee benefits lower by 1.5% y/y, thanks to the launch of the voluntary redundancy program at the end of 2024.

Net allowances for expected credit losses in 2025 amounted to PLN 760 million and was lower by PLN 123 million, i.e. 13.9% than in 2024.

Contributions to the Bank Guarantee Fund in 2025 amounted to PLN 384 million and were higher by PLN 145 million, i.e. 60.7% than in 2024 due to the restoration of contributions to the Bank Guarantee Fund, which had not been collected for the last two years, and an increase in the volume of guaranteed funds.

The tax on certain financial institutions in 2025 amounted to PLN 861 million and was lower by PLN 37 million, i.e. 4.1% than in 2024.

Volumes

As at the end of December 2025, loans and advances at nominal value amounted to PLN 202,214 million and were higher by PLN 15,707 million, i.e. 8.4%, than at the end of December 2024.

At the end of December 2025, the volume of retail loans amounted to PLN 88,005 million and were higher by PLN 4,237 million, i.e. 5.1% than at the end of December 2024, thanks to the sale of cash loans higher by 17.3% y/y, which allowed for an increase in volumes by 13.1% y/y and sales of mortgage loans at the level of PLN 10,8 billion, which allowed for an increase in volumes by 3.6% y/y.

At the end of December 2025, corporate loans, including non-Treasury debt securities, amounted to PLN 114,209 million and were higher by PLN 11,470 million, i.e. 11.2%, compared to the end of December 2024, mainly due to a strong increase in corporate loans in the MID and SME segments by 13.1% y/y and loans to large enterprises by 11.4% y/y, with the acquisition of over 3.8 thousand new customers and an enriched product offer.

As at the end of December 2025, liabilities to the Group's customers amounted to PLN 268,463 million and were higher by PLN 9,429 million, i.e. 3.6%, than at the end of December 2024.

As at the end of December 2025, retail and other amounted to PLN 155,098 million and were higher by PLN 5,388 million, i.e. 3.6%, compared to the end of December 2024.

As at the end of December 2025, corporate and other amounted to PLN 113,365 million and were higher by PLN 4,041 million, i.e. 3.7%, compared to the end of December 2024.

As at the end of December 2025, the net assets of investment funds managed by Pekao TFI S.A. amounted to PLN 41,224 million and were higher by PLN 9,035 million, i.e. 28.1% compared to the end of December 2024, thanks to both higher valuation and high net sales of investment funds in 2025 at the level of PLN 5.6 billion.

4. External Activity Conditions

Economic growth

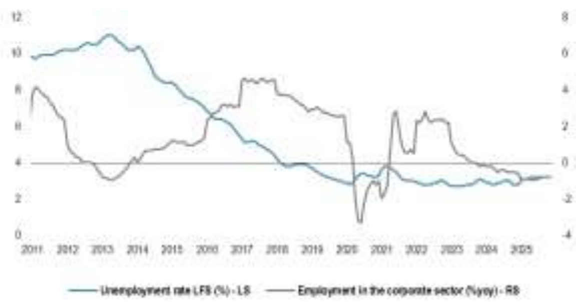
In 2025, Poland's GDP growth accelerated from 3.0% to around 3.6% year-on-year. The main driver of growth was private consumption, which accelerated from 2.9% to around 3.7% yoy despite a slowdown in real wage growth (from 7.5% to 4.0% yoy compared with 2024).

Investment, however, was disappointing: although it increased by around 4,2% yoy, this was slower than expected given the ongoing acceleration in the disbursement of EU funds. The contribution of foreign trade (net exports) to growth was negative for the second consecutive year and subtracted around 0.2 percentage points from Poland's GDP growth in 2025.

In 2026, according to Pekao economists, the Polish economy is expected to accelerate once again, with GDP growth reaching 4.0% yoy. In the growth structure, due to a further deceleration in real wage growth, private consumption will be less dominant, while investment supported by the accelerating absorption of EU funds, including those from the National Recovery Plan (KPO) -will play a stronger role. The contribution of foreign trade is expected to remain negative due to the lack of prospects for a clear improvement in foreign demand for Polish goods.

Labour market

The unemployment rate at end-2025 stood at 5.7%, up from 5.1% at end-2024. This marked increase does not reflect a deterioration in domestic labour market conditions, but rather results from regulatory changes associated with the reform of labour offices. Consequently, at this stage a more reliable measure free from regulatory distortions is the unemployment rate according to the Labour Force Survey (LFS), which rose to 3.2% in the third quarter of the year, from 3.0% in both the third quarter of 2024 and the second quarter of 2025. The evolution of this indicator accurately captures the condition of the domestic labour market in 2025: the economy experienced a mild deterioration, driven by a steadily declining demand for labour on the part of employers, alongside a persistently high labour force participation rate.



At the same time, average employment in the enterprise sector was lower by 0.8% yoy for most of the year, while the number of full-time jobs declined by 40 thousand by November 2025 (compared with a decline of 60 thousand a year earlier). However, this was largely the result of reductions in working time, which accounted for around half of the reported decline.

Wage growth in the enterprise sector decelerated markedly in 2025 from over 9% yoy in January to slightly above 7% in November. As a result, average annual wage growth slowed to around 8%, down from 11% in the previous year. Stagnant employment trends combined with inflation remaining at the NBP target are conducive to a further moderation in wage growth.

In the first quarter of 2026, the unemployment rate is expected to rise due to seasonal factors, before resuming its decline around the turn of the first and second quarters, heading towards this year's minimum of approximately 5.5%. By the end of 26, the unemployment rate should remain at 5.7 saw in December 2025. Wage growth will continue to decelerate, albeit at a somewhat slower pace, ultimately falling by nearly 2 percentage points compared with the previous year. As a result, nominal wage growth in the enterprise sector is projected to decline to around 5,5% in 2026. Moreover, we forecast a slight acceleration in employment growth rate in the enterprise sector, to -0.5% in 2026 from -0.8% in 2025.

Inflation and monetary policy

The second half of 2025 saw a further decline in consumer price inflation (CPI) – it returned to the National Bank of Poland's (NBP) target at the end of the year, faster than previously forecast. CPI ended 2025 at 2.4% yoy. Core inflation (excluding food, energy and fuel prices), although on a downward trend, remained higher, primarily due to persistent cost pressures in the services sector. Average annual CPI in 2025 reached 3.6%, identical to 2024, but with a fundamentally different trajectory – rising in 2024 and clearly declining in 2025.

This is not the end of the disinflation process in Poland, although the rate of inflation decline will slow significantly in 2026. Inflationary pressure from regulated prices will remain limited: energy prices for households will remain at a similar level in 2026, despite the formal "unfreezing" of electricity prices. Furthermore, the president's veto prevented larger hikes in excise taxes on alcohol and tobacco products and an increase in the sugar tax. The food market is also signaling low price pressure due to the end of previous supply disruptions.

Stable prices of industrial and energy commodities limited inflationary pressures in the goods segment in 2025, and there is little indication of a significant change in this picture in 2026. An additional disinflationary factor will be the growing share of cheap imports from China – amid US tariffs, Chinese exporters are intensifying their search for alternative markets, including in Europe. Risks to this scenario primarily focus on geopolitical factors – escalating conflicts or tightening sanctions could lead to higher prices for energy and industrial commodities, weakening the disinflationary outlook for goods inflation in 2026.

Core inflation is no longer a key concern, although services inflation will remain significantly higher than goods inflation due to the "stickiness" of high labour costs. The projected Poland's high economic growth rate in 2026 should not generate additional inflationary pressure, given the still-closing output gap and the relatively high rate of productivity growth in the economy.

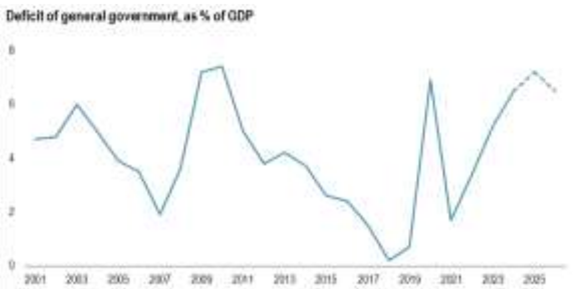
According to forecasts by Bank Pekao economists, average annual CPI inflation in 2026 will reach 1.9%, below the NBP projection and market consensus.

In the fourth quarter of 2025, the Monetary Policy Council (MPC) continued its monetary easing, cutting interest rates by 25bps at each meeting. Year 2025 ended with the reference rate at 4.00%. In total, the Council cut rates by 175bps throughout the year, marking the strongest monetary policy easing since 2013. A key factor enabling such decisive action was faster-than-expected disinflation.

After the January- February pause in the cycle, interest rate cuts are expected to continue, and market consensus indicates that the reference rate will reach the target level (3.25%) by mid-2026 at the latest. At the same time, the Council will likely maintain cautious communication, emphasizing the risks of secondary inflationary effects related to the closing output gap, strongly expansionary fiscal policy and heightened geopolitical uncertainty.

Fiscal policy

The central government budget deficit in 2025 amounted to approximately PLN 276 billion (as estimated by Pekao economists) — several dozen billion zlotys less than assumed in the Budget Act (PLN 289 billion), and at the same time PLN 65 billion more than a year earlier. The increase in the deficit was driven mainly by the reform of local government financing (an increase in their share of PIT revenues) and by the need for the Ministry of Finance to redeem Treasury bonds issued by the Polish Development Fund (PFR) during the pandemic, with a total value of PLN 34 billion. New social transfers were also introduced (widow's pensions), but their scale was smaller than in the previous year. Tax rates did not change significantly, but tax revenues were lower than expected. This applied in particular to VAT, which generated around PLN 320 billion compared with the planned PLN 341 billion, as well as to CIT revenues. CIT receipts were expected to amount to PLN 80 billion but reached slightly less than PLN 70 billion.



According to estimates by Pekao economists, the general government deficit amounted to around 7% of GDP in 2025 (final data will be published in April 2026), compared with 6.5% of GDP a year earlier. This is a high level, but in the past year it did not result in difficulties in financing the government's borrowing needs. Treasury bond yields remained elevated, but Poland's risk premium-measured, for example, by the spread between domestic government bond yields and German Bunds-declined.

The 2026 Budget Act assumes a deficit at a level similar to that of the previous year (PLN 271 billion), which implies a slight decline as a percentage of GDP (from around 7% to 6.5% of GDP). No tax cuts or significant increases in expenditure (such as new social transfers) are planned. Expenditure financed from EU funds, including the National Recovery Plan (KPO), will increase significantly. This will translate into an increase in the Ministry of Finance’s borrowing needs by around 15% compared with 2025. However, these needs will be financed to a slightly smaller extent (though still predominantly) through the issuance of Treasury bonds and to a greater extent through EU loans (the loan component of the KPO and SAFE). This creates an opportunity for a decline in yields on Treasury bonds.

Capital markets

Due to changes in US trade policy, 2025 was a turbulent year, but ultimately turned out to be quite conventional in terms of investor returns. Nevertheless, not all asset classes yielded the same returns. Treasury bond holders had to settle for rather modest gains. As in the previous year, changes in market interest rates were very unevenly distributed. While ongoing monetary policy easing cycles around the world allowed for a significant decline in short-term bond yields, investors could expect much less at the so-called long end of the curve. In fact, yields on 30-year treasury securities in key markets either remained unchanged or even increased. This behavior of the longest-term treasury securities was due, among other things, to increased political and geopolitical risks affecting global capital flows, and above all to the lack of progress in fiscal consolidation in the major developed economies. Equity markets, on the other hand, performed very well: S&P500 gained 16.4%, Japanese Nikkei225 26.2%, German DAX 23%, Chinese Shanghai Composite 18.4% and British FTSE250 9.0%. French CAC40 gained 10.4%. Thus, 2025 stood out owing to its relatively low returns on investments in US stocks. This can be attributed to the slowdown in economic growth in that country, uncertainty about the shape of trade and economic policy, increased appetite for diversification of investment portfolios after years of US dominance, and factors specific to individual countries (reflation in Japan, fiscal package in Germany).

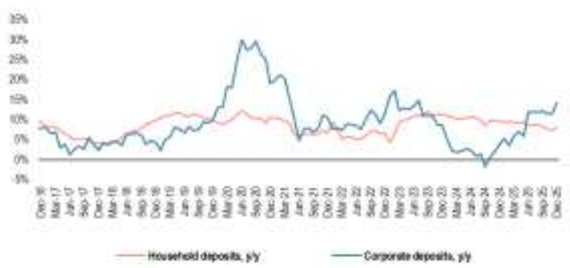
In 2025, the Warsaw Stock Exchange’s star was shining brightly. All major indices on the Warsaw trading floor were characterized by above-average returns and breaking new all-time records (with the exception of the WIG20 index, which still had not beaten its 2007 highs). The broad market WIG index grew by 47.3%, the WIG20 index of the largest companies gained 45.3%, medium-sized companies represented in the mWIG40 index yielded a 33.6% return, and the sWIG80 index, which groups small-cap companies, rose by 25.4%. In 2024, the downward trend in the number of companies listed on the stock exchange continued, with 15 companies delisting and three making their debut. Interest in the Warsaw Stock Exchange increased significantly, with the total value of trading on the stock market amounting to PLN 470 billion (for comparison, in 2024 it was PLN 331 billion).

Banking sector

According to data from the Financial Supervision Authority (FSA), the banking sector's net profit in 2025 amounted to PLN 48,9 billion (+21,6% y/y) compared to PLN 40,2 billion in the whole of 2024. The increase in profits took place in an environment of falling interest rates: the inelastic supply of deposits allowed interest costs to remain unchanged, while interest income increased by PLN 3 billion y/y. Expenses related to provisions and write-offs also decreased, contributing PLN 3,5 billion y/y to net profit. However, the sector's performance was weighed down by dynamic wage growth, which translated into an increase in expenses related to costs of operation of PLN 4,0 billion y/y.

According to the KNF data, the banking sector's assets in 2025 amounted to PLN 3,685 billion, an increase of 9.7% y/y.

According to data from the National Bank of Poland, the following trends were observed in the main deposit categories:

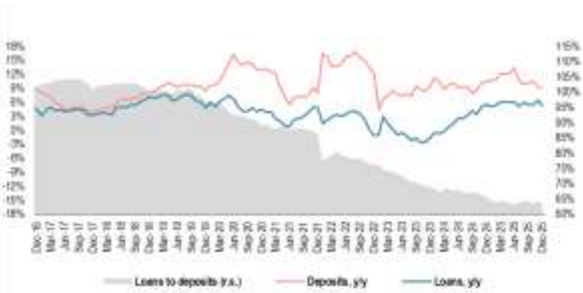


The growth rate of household deposits in 2025 remained in single digits and slowed down (9.4% y/y in January, 7.9% y/y in December). In 2026, deposit growth will continue to slow down, reaching around 7% y/y due to lower projected wage growth.

The volume of corporate deposits accelerated aggressively at the end of last year (14.4% y/y in December), and in 2026 its growth will remain in double digits. This will mirror the credit boom and strengthening demand for credit from non-financial corporations.

The structure of deposits remained stable. In December 2025, private deposits accounted for 88.6% of all retail deposits. The share of term deposits remained high (30.5%), although it declined slightly as a result of interest rate cuts. We forecast that in 2026, the growth in the volume of current deposits will be half as high as that of term deposits.

The following trends were observed in the main categories of receivables:



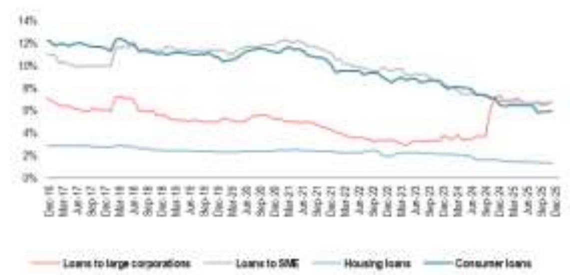
In 2025, and especially in the second half of the year, the decline in interest rates was a clear stimulus for lending. The growth of the consumer loan portfolio accelerated from 5.8% y/y in January to 8.1% y/y in December. At the same time, despite the very high value of new mortgage sales (over PLN 100 billion, a significant part of which, however, was the result of refinancing existing liabilities), the value of mortgage portfolio amortisation was close to PLN 70 billion.

As a result, the volume of PLN-denominated housing loans grew by only 8.0% y/y. Altogether, loans for households grew by 4.1% y/y.

Increased interest in loans among entrepreneurs, motivated both by demand (economic recovery, NGEU investments) and supply (falling interest rates), was clearly visible in the data for 2025. After six consecutive months of double-digit growth, the operating loan portfolio ultimately grew by 7.2% y/y. The growth rate of investment loans was 10.5% y/y. Loans to businesses grew by a total of 9.0% y/y.

Deposit growth in the banking sector continues to outpace lending growth, but the credit recovery in 2026 will put an end to this phenomenon. The loan-to-deposit ratio (LtD) stood at 63.6% in December, above the historical low of 63.2% recorded in June. It is expected that 2025 had marked the bottom for the LtD index, with some rebound expected in 2026. Persistent excess liquidity is driving increased interest among banks in investing in treasury securities, as evidenced by the dynamic growth in the share of securities and shares in the sector's total assets (+23.4% y/y after November).

The quality of the sector's loan portfolio improved in 2025 and is at historically high levels (the NPL ratio was 3.4% in November 2025, compared to 3.7% at the end of 2024). Further interest rate cuts and economic recovery will contribute to a further improvement in the quality of the loan portfolio.



The share of non-performing loans in the loan portfolios of households (3.5%) and small businesses (6.6%) remained on a favourable downward trajectory. The percentage of risky liabilities of large enterprises as a result of events in the second half of 2024 peaked in March last year (7.1%) and then fell to 6.8% in the following months.

4.1 Important factors influencing the Group’s activities and results

The activities of Bank Pekao in 2025 were mainly determined by the macroeconomic situation in the country and abroad. The year 2025 was a year of stabilization and clear acceleration for the Polish economy.

In 2025, Poland was in a phase of moderate economic recovery, achieving GDP growth rates in the range of 3.5–3.7%. The main factors driving the economy in 2025 included private consumption, the inflow of funds from the National Recovery Plan (KPO), increased public investment, and monetary policy easing. According to the November "Inflation and GDP Projection" and the Bank's forecasts, economic growth will further accelerate in 2026. The Bank forecasts GDP growth at 4.0%.

The annual consumer price inflation (CPI) fell to 2.4% in December 2025, slightly below the National Bank of Poland's (NBP) target of 2.5%. At the end of 2025, inflation in Poland was nearly half that of the previous year. Risk factors influencing inflation in 2025 included fiscal policy, the expected recovery in economic demand, continued wage growth, and the macroeconomic situation abroad, including changes in commodity prices and global inflation. Available forecasts suggest that inflation will hover around the NBP target in the next 12 months.

Poland's monetary policy in 2025 was characterized by a cycle of interest rate cuts aimed at adapting interest rates to inflation falling faster than expected. The Monetary Policy Council's decision (six rate cuts) in 2025 led to a reduction in the reference rate from 5.75% to 4.00%.

The Polish banking sector reported strong financial results in 2025, with net profit approaching a record high thanks to high interest income and the sale of treasury bonds. This was largely due to continued elevated interest rates. Despite interest rate cuts that began to slow growth, profits were record-breaking and higher than those for 2024. These interest rate cuts contributed to higher costs and put pressure on margins, prompting banks to diversify and invest in technology while maintaining a stable capital and liquidity position.

In 2025, Polish banks recorded stable deposit growth, particularly from households. A significant factor influencing the deposit growth dynamics was the reduction in NBP interest rates from 5.75% at the end of 2024 to 4% at the end of 2025.

Bank lending growth in 2025 was upward, especially in the housing and cash loan segments, driven by falling interest rates, rising creditworthiness, and income, which led to an increase in lending. The decline in interest rates supported continued improvement in conditions for borrowers. After a weaker start to 2025, the second half of the year saw a clear rebound in the installment loan market. Stabilization of net interest income despite interest rate cuts significantly supported overall revenues.

The cost of risk in the Polish banking sector in 2025 was primarily influenced by legal risks associated with Swiss franc loans. The legal risk associated with foreign currency loans remains significant, although its impact on the stability of the financial system has been significantly reduced. The value of foreign currency-denominated housing loans is steadily declining, as a result of repayments, court judgments, and settlements with borrowers.

The scale of the provisions created means the sector is currently well prepared for the further materialization of this risk. Nevertheless, the costs associated with foreign currency mortgages will continue to be a burden for banks. Several years after the first CJEU ruling, banks have experience managing the risk of foreign currency mortgages, including estimating the necessary provisions and concluding settlements with borrowers. They are increasingly offering settlements for contracts subject to legal disputes.

Banks effectively manage other risk areas, such as regulatory and legislative risk (MREL, capital requirements), maintaining the stability of the financial system and adapting to a dynamic environment.

The operating costs of the Polish banking sector in 2025 grew moderately, in line with inflation, while improving efficiency. Investments in digitization, artificial intelligence, and personalized offerings were crucial for cost management, helping maintain cost discipline despite growing technology spending.

In 2025, banks continued processes related to operational and digital transformation, the importance of customer service in remote channels grew, and many banking processes were digitized. New technical solutions were introduced, and the functionalities of banking applications were expanded. This was accompanied by a reduction in stationary branches.

5. Organizational Structure

5.1 Changes in the Bank Pekao S.A. Group

The composition of Bank Pekao S.A. Group is presented in the Note 2 to the Consolidated Financial Statements of Bank Pekao S.A. Group for the year ended on 31 December 2025.

The most important changes in the Group that took place in 2025 are discussed below.

FPB-Media" sp. z o.o.
On 8 April 2025, "FPB-Media" sp. z o.o. was deleted from the register of entrepreneurs in National Court Register. The decision to delete the company became final on 24 April 2025.

Pekao Fundusz Kapitałowy sp. z o.o.
On 4 June 2025, the Extraordinary General Meeting of Shareholders of Pekao Fundusz Kapitałowy sp. z o.o. w likwidacji revoked the liquidation of the Company as of 1 July 2025 and amended the Company Agreement. The purpose of these activities is to use the Company's potential to implement projects carried out for the Pekao Group.

Pekao Bank Hipoteczny S.A.
On 18 August 2025, the Extraordinary General Meeting of Pekao Bank Hipoteczny S.A. adopted a resolution on the division of the Company by transferring to Bank Pekao S.A. a part of the Company's assets and rights and obligations in the form of an organized part of the Company's enterprise, in accordance with the previously published Demerger Plan. As part of the demerger, the Company's share capital was reduced by PLN 100,000 through the redemption of one series G share with a nominal value of PLN 100,000.

On the same day, the Extraordinary General Meeting of Pekao Bank Hipoteczny S.A. adopted a resolution to increase the Company's share capital by PLN 90,000,000 through the issue of 900 series M shares with a nominal value of PLN 100,000 per share. Series M shares will be offered exclusively to Bank Pekao S.A. by way of a private subscription. In connection with the above changes, the Company's Articles of Association were also amended with respect to the amount of the share capital, which, after taking into account the events described above, will amount to PLN 692,900,000.

The above-mentioned changes in the demerger and reduction of the share capital became effective on 3 October 2025, in connection with the entry in the register of entrepreneurs of the National Court Register. The organized part of the Company's business transferred to Bank Pekao S.A. includes, in particular, activities related to selected types of loans. This consolidation is the result of the recommendations of the Polish Financial Supervision Authority aimed at restoring profitability and stabilizing the Company's results. The increase of Company's share capital by PLN 90,000,000 was registered in National Court Register on 28 October 2025.

On 27 October 2025, the Extraordinary General Meeting of Pekao Bank Hipoteczny S.A. adopted a resolution to reduce the Company's share capital by PLN 345,604,662 in order to cover the loss from previous years. The share capital reduction will be effected by reducing the nominal value of each share to PLN 50,122.

In connection with the above change, the Company's Articles of Association were also amended with respect to the amount of the share capital, which, after taking into account the event described above, will amount to PLN 347,295,338. On 3 December 2025, the Polish Financial Supervision Authority issued decisions allowing the reduction of the share capital and amendments to the Company's Articles of Association. The described changes are awaiting entry in the National Court Register.

Pekao Inwestycje Dłużne sp. z o.o.
On 16 October 2025 Pekao Inwestycje Dłużne sp. z o.o. was established. The Company's share capital amounts to PLN 20,000,000 and is divided into 10,000 shares with a nominal value of PLN 2,000 each. All shares in the Company's share capital were acquired by Pekao Investment Banking S.A. The Company's business is other financial service activities, excluding insurance and pension funds.

On 4 November 2025 the Company's Supervisory Board was appointed, and on 5 December 2025 the Management Board was appointed. The company was registered in the register of entrepreneurs of the National Court Register on 15 December 2025.

Centrum Kart S.A.
On 15 November 2025, the core business of Centrum Kart S.A. became an integral part of Bank Pekao S.A. The decision to incorporate the Company's operations into the Bank's structures resulted from the need to simplify and strengthen the operating model in the area of payments. The change will translate into further development in the area of payments and more efficient project management and development of modern services.

Pekao Direct sp. z o.o.
In November 2025, Pekao Direct sp. z o.o. commenced a new activity related to the provision of body leasing services to Bank Pekao S.A. and the Pekao Group. Previously, the Company provided contact center services for the Bank (this activity was transferred to the Bank's structures as of 1 May 2025).

5.2 Changes in the Statutory Bodies of the Bank

Supervisory Board

The composition of the Supervisory Board of Bank Pekao S.A. has as follows:

AS AT THE DATE OF SUBMITTING THE REPORT FOR 2025	31 DECEMBER, 2025	AS AT THE DATE OF SUBMITTING THE REPORT FOR THE THIRD QUARTER OF 2025
Bogdan Benczak Chairman of the Supervisory Board	Bogdan Benczak Chairman of the Supervisory Board	Andrzej Klesyk Chairman of the Supervisory Board
Artur Nowak-Far Deputy Chairman of the Supervisory Board	Artur Nowak-Far Deputy Chairman of the Supervisory Board	Artur Nowak-Far Deputy Chairman of the Supervisory Board
Bartosz Grześkowiak Deputy Chairman of the Supervisory Board	Bartosz Grześkowiak Deputy Chairman of the Supervisory Board	Bartosz Grześkowiak Deputy Chairman of the Supervisory Board
Magdalena Joanna Dziewguć Secretary of the Supervisory Board	Magdalena Joanna Dziewguć Secretary of the Supervisory Board	Magdalena Joanna Dziewguć Secretary of the Supervisory Board
Diana Dębowczyk Member of the Supervisory Board	Diana Dębowczyk Member of the Supervisory Board	Radosław Niedzielski Member of the Supervisory Board
Mariusz Jaszczyk Member of the Supervisory Board	Mariusz Jaszczyk Member of the Supervisory Board	Mariusz Jaszczyk Member of the Supervisory Board
Jacek Nieścior Member of the Supervisory Board	Jacek Nieścior Member of the Supervisory Board	Jacek Nieścior Member of the Supervisory Board
Krzysztof Czeszejko-Sochacki Member of the Supervisory Board	Krzysztof Czeszejko-Sochacki Member of the Supervisory Board	Krzysztof Czeszejko-Sochacki Member of the Supervisory Board
Witold Walkowiak Member of the Supervisory Board	Witold Walkowiak Member of the Supervisory Board	Witold Walkowiak Member of the Supervisory Board

Detailed information on the Bank's Supervisory Board can be found in Chapter 12 Statement of Bank Polska Kasa Opieki Spółka Akcyjna on the application of corporate governance principles in 2025, - in part: *Description of the functioning of the management, supervisory, or administrative bodies of the Bank, as well as their committees, along with an indication of the composition of these bodies and any changes that occurred within them during the last financial year*

Management Board of the Bank

The composition of the Management Board of Bank Pekao S.A. has as follows:

AS AT THE DATE OF SUBMITTING THE REPORT FOR 2025	31 DECEMBER, 2025	AS AT THE DATE OF SUBMITTING THE REPORT FOR THE THIRD QUARTER OF 2025
Cezary Stypułkowski President of the Bank's Management Board,	Cezary Stypułkowski President of the Bank's Management Board	Cezary Stypułkowski President of the Bank's Management Board
Marcin Gadomski Vice President of the Bank's Management Board	Marcin Gadomski Vice President of the Bank's Management Board	Marcin Gadomski Vice President of the Bank's Management Board
Łukasz Januszewski Vice President of the Bank's Management Board	Łukasz Januszewski Vice President of the Bank's Management Board	Łukasz Januszewski Vice President of the Bank's Management Board
Michał Panowicz Vice President of the Bank's Management Board	Michał Panowicz Vice President of the Bank's Management Board	Michał Panowicz Vice President of the Bank's Management Board
Robert Sochacki Vice President of the Bank's Management Board	Robert Sochacki Vice President of the Bank's Management Board	Robert Sochacki Vice President of the Bank's Management Board
Błażej Szczecki Vice President of the Bank's Management Board	Błażej Szczecki Vice President of the Bank's Management Board	Błażej Szczecki Vice President of the Bank's Management Board
Dagmara Wojnar Vice President of the Bank's Management Board	Dagmara Wojnar Vice President of the Bank's Management Board	Dagmara Wojnar Vice President of the Bank's Management Board
Marcin Zygmanowski Vice President of the Bank's Management Board	Marcin Zygmanowski Vice President of the Bank's Management Board	Marcin Zygmanowski Vice President of the Bank's Management Board

Detailed information on the Bank's Management Board can be found in Chapter 12 Statement of Bank Polska Kasa Opieki Spółka Akcyjna on the application of corporate governance principles in 2025, - in the part: *Description of the functioning of the management, supervisory, or administrative bodies of the Bank, as well as their committees, along with an indication of the composition of these bodies and any changes that occurred within them during the last financial year*

5.3 Organizational changes

In 2025, we introduced a number of organizational changes within the Bank's Head Office.

Within structure of Retail and Private Banking Division, Private Banking Center was established, comprising Private Banking Department and Private Banking Development Department. The Retail Banking Segment and Product Development Center was created, consolidating product and segment units of the Division. A new Contact Center Department, dedicated to sales and development of remote customer service, was also established.

Retail and Private Banking Division was restructured into Branch Distribution, Private Banking and Operations Division which includes: Retail Banking Distribution Department, Retail and Private Banking Strategy and Transformation Department, Private Banking Center and Corporate Services and Operations Center.

Retail Banking Segment and Product Development Center, Contact Center Department, and Digital Sales and Service Department were incorporated into newly formed Integrated Channels, Products and Retail Segments Division. Activities previously performed by Pekao Direct were incorporated into structure of Contact Center Department.

Within Strategy and Corporate Affairs Division, the Investor Relations Department and Shareholder Relations Office were merged into a single unit — Investor Relations and Shareholder Cooperation Department. Equity Investments and Ownership Supervision Department was established by integrating the former Equity Investments Office and Ownership Supervision Office. Analytics and Digital Transformation Center, previously reporting directly to the President of Management Board, was incorporated into the Division. Data Protection Inspector Department was moved to Technology Transformation and Innovation Division.

Technology and Operations Division was transformed into Technology Transformation and Innovation Division, comprising IT Center, Security Center, and New Technologies and Development Department, renamed into AI Transformation Department. Within IT Center, the Card Department was created, consolidating most activities formerly performed by Centrum Kart S.A. (Card Center).

Human Resources Division was transformed into People, Organization and CX Division, with Customer Experience Management Department transferred from Strategy and Corporate Affairs Division. HR Strategy Center was established, bringing together key units responsible for HR, payroll, organizational culture development, process analysis and optimization.

Transaction Banking Department was transferred from Corporate Banking and MIB Division to Commercial Banking Division, to which Payment Acceptance Office — formerly part of Digital Sales and Service Department — was added.

Within Financial Division, the Data and Information Management Center was created, comprising Management and Financial Information Department, Data Management Office (transferred from Analytics and Digital Transformation Center), and newly established Data Platform Support and Development Office.

6. Information for the Investors

6.1 The Bank's share capital and share ownership structure

As at 31 December 2025, the share capital of Bank Pekao S.A. amounted to PLN 262,470,034 and remained unchanged until the date of submitting the report. The Bank's share capital was divided into 262,470,034 shares in the following series:

- 137,650,000 Series A bearer shares with a par value of PLN 1.00 per share,
- 7,690,000 Series B bearer shares with a par value of PLN 1.00 per share,
- 10,630,632 Series C bearer shares with a par value of PLN 1.00 per share,
- 9,777,571 Series D bearer shares with a par value of PLN 1.00 per share,
- 373,644 Series E bearer shares with a par value of PLN 1.00 per share,
- 621,411 Series F bearer shares with a par value of PLN 1.00 per share,
- 603,377 Series G bearer shares with a par value of PLN 1.00 per share,
- 359,840 Series H bearer shares with a par value of PLN 1.00 per share,
- 94,763,559 Series I bearer shares with a par value of PLN 1.00 per share.

All the existing shares are ordinary bearer shares. There are no special preferences or limitations connected with the shares, or differences in the rights attached to them. The rights and obligations related to the shares are defined by the provisions of the Polish Commercial Companies Code and other applicable law.

Bank Pekao S.A.'s Largest Shareholder

As of the date of the 2025 report, the largest shareholder of Bank Pekao S.A. is Powszechny Zakład Ubezpieczeń S.A. (PZU), which holds 52,494,007 shares, representing 20.00% of the share capital and total votes at the Bank's General Meeting. PZU is one of the largest financial institutions in Poland, playing a key role in the insurance and investment sectors.

Shareholders of Bank Pekao S.A., holding directly or indirectly, through subsidiaries, at least 5% of the total number of votes at the General Meeting of the Bank, are as follows:

SHAREHOLDER'S NAME	NUMBER OF SHARES AND VOTES AT THE GENERAL MEETING	SHARE IN SHARE CAPITAL AND TOTAL NUMBER OF VOTES AT THE GENERAL MEETING	NUMBER OF SHARES AND VOTES AT THE GENERAL MEETING	SHARE IN SHARE CAPITAL AND TOTAL NUMBER OF VOTES AT THE GENERAL MEETING	NUMBER OF SHARES AND VOTES AT THE GENERAL MEETING	SHARE IN SHARE CAPITAL AND TOTAL NUMBER OF VOTES AT THE GENERAL MEETING
	AS AT THE DATE OF SUBMITTING THE REPORT FOR 2025		31 DECEMBER 2025		AS AT THE DATE OF SUBMITTING THE REPORT FOR THE THIRD QUARTER OF 2025	
Powszechny Zakład Ubezpieczeń S.A.	52,494,007	20.00%	52,494,007	20.00%	52,494,007	20.00%
Polski Fundusz Rozwoju S.A.	33,596,166	12.80%	33,596,166	12.80%	33,596,166	12.80%
Nationale-Nederlanden Otwarty Fundusz Emerytalny	14,701,415	5.60%	14,701,415	5.60%	18,367,000	7.00%
Allianz Polska Otwarty Fundusz Emerytalny	13,935,661	5.31%	13,935,661	5.31%	14,000,000	5.33%
Other shareholders (below 5%)	147,742,785	56.29%	147,742,785	56.29%	144,012,861	54.87%
Total	**262,470,034**	**100.00%**	**262,470,034**	**100.00%**	**262,470,034**	**100.00%**

Until the date of submitting the report the Bank has not received any other notifications regarding changes in the ownership structure in accordance with par. 69 of the Act of July 29, 2005 on Public Offerings and Conditions Governing the Introduction of Financial Instruments to an Organized System of Trading, and on Public Companies.

Polish open-end pension funds (OFE) constitute the group of financial investors holding a significant equity interest in the Bank. Based on their publicly available financial reports, as of 31 December, 2025 OFE's held in aggregate 18.34% of the Bank's shares.

The Polish open-end pension funds' holdings in Bank Pekao S.A.:

SHAREHOLDER	NUMBER OF SHARES AND VOTES AT GENERAL MEETING	% OF SHARE CAPITAL AND TOTAL VOTE AT GENERAL MEETING	NUMBER OF SHARES AND VOTES AT GENERAL MEETING	% OF SHARE CAPITAL AND TOTAL VOTE AT GENERAL MEETING
	31 DECEMBER 2025		31 DECEMBER 2024	
Nationale-Nederlanden OFE	14,701,415	5.60%	16,834,767	6.41%
Allianz Polska OFE	13, 935, 661	5.31%	14,140,661	5.39%
Generali OFE	7 ,488, 295	2.85%	7,299,199	2.78%
Vienna OFE	4 ,778, 342	1.82%	4,898,495	1.87%
PKO BP Bankowy OFE	3, 200 ,710	1.22%	3,237,007	1.23%
Uniqa OFE	3, 153 ,684	1.20%	3,153,684	1.20%
OFE Pocztylion	866, 568	0.33%	926,568	0.35%
Total	**48,124,675**	**18.34%**	**50,490,381**	**19.24%**

Note: OFE Reports, annual structure of open-end pension funds assets.

6.2 Performance of market valuation of Bank Pekao S.A.'s stock

The shares of Bank Pekao S.A. have been listed on the Warsaw Stock Exchange since June 1998 and they are one of the most liquid equities in Poland and Central and Eastern Europe.

The Bank's market capitalization as of 31 December, 2025 amounted to PLN 53.8 billion making the Bank one of the largest listed companies in Central and Eastern Europe. Given the high capitalization and liquidity the Bank's shares are a part of many important stock indices maintained by domestic and foreign institutions including Polish blue chips index – WIG20 and WIG30, banking sector index WIG-Banks, STOXX Europe 600 Index, the index of the largest and most liquid securities in Europe, FTSE Developed Equity Index as well as MSCI Emerging Markets. The Bank's shares are also included in Bloomberg Gender Equality Index, bringing together a listed company actively working for gender equality at work.

With the average daily turnover volume at the level of 819.6 thousands of shares and the worth of trading at PLN 37 billion in 2025, the share of the Bank's stock in trading on the WSE amounted to 7.88%.

Share price of Bank Pekao S.A. increased by 51.31% y/y and reached PLN 205.10 as at the end of December 2025 compared to PLN 137.90 a year earlier. Total shareholder return for the Bank's shareholders (including dividend payment at PLN 18.36 per share) amounted to 65% and was higher than return for the WIG Banks index, which grew by 55% in 2025.

Share price performance of Polish banks in 2025 was influenced primarily by the sector's record results thanks to high interest rates remaining throughout the year.

Basic information about Bank Pekao S.A. shares

	2025	2024
Share price at the end of the year (PLN)	205.10	137.90
Maximum share price (PLN)	223.10	191.50
Minimum share price (PLN)	135.55	131.15
Number of shares	262,470,034	262,470,034
Capitalization at the end of the year (PLN billion)	53.8	36.2
Average trading volume	819,614	664,303
Earnings per share (PLN)(*)	26,73	24.19
Book value per share (PLN)(**)	124.93	116.75
Dividend per share paid in a given year (PLN)	18,36	19.20
P/E (x)(***)	7.9	5.7
P/BV (x)(***)	1.62	1.18

Note: Data based on GPW statistics.

(*) Earnings per share calculated as the sum of quarterly earnings per share for four consecutive quarters, where the last quarter is the fourth quarter of a given year.
(**) Book value per share calculated on the basis of financial data for the fourth quarter of a given year.
(***) Indicators calculated in relation to the financial data after the third quarter of a given year.

6.3 Dividend payment history

In 2025, the Bank paid a record dividend of PLN 18.36 per share, which consisted of the payment of 75% of net profit for 2024. Dividend yield was 9%. In the years 2010-2024, the Bank regularly paid dividends, except for the distribution of profit for 2019, when due to the COVID-19 pandemic, the Polish Financial Supervision Authority recommended the Bank not to pay dividends. The total value of dividends paid for the years 2010-2024 amounted to over PLN 32 billion, making the Bank one of the Polish companies with the highest level of dividends paid in recent years.

The dividend payments from 2010 to 2024 are presented below:

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Dividend for the year (in PLN million)	1,785	1,412	2,202	2,614	2,625	2,283	2,278	2,074	1,732	-	843	1,129	1,423	5,039	4,819
Dividend per 1 share (in PLN)	6.80	5.38	8.39	9.96	10.00	8.70	8.68	7.90	6.60	-	3.21	4.30	5.42	19.20	18.36

Note: Dividend presented in the year in which the profit intended for dividend payment was generated.

In accordance with the Bank's strategy "… the only way is up!" for the years 2025-2027, Bank Pekao intends to allocate 50-75% of its net profit to dividend payments. The final decision on the distribution of the profit for 2025 and its allocation to the payment of dividends will be made by the General Meeting of Shareholders.

6.4 Investor Relations

The Bank's activity, in the investor relations area, is focused on providing transparent and active communication with the market through active co-operation with investors, analysts and rating agencies, as well as fulfilling disclosure requirements within the frameworks of applicable law regulations.

The Bank's representatives regularly hold many meetings with investors from Poland and abroad, and take part in most of the regional and sector dedicated investors conferences. In total, in 2025, the bank participated in 27 investor conferences and roadshows meetings with institutional investors from key financial centers around the world. In 2025, the Bank's representatives held meetings with a total of 618 investors. Financial results of Bank Pekao S.A. Group are presented quarterly at conferences that are simultaneously transmitted via Internet.

The Bank's financial results and its activity are regularly monitored by analysts representing Polish and foreign brokerage entities. In 2025, 17 analysts published reports and recommendations on the Bank.

Recommendation structure for Bank Pekao S.A. shares for 31 December 2025

Buy/Accumulate	10
Hold/Neutral	7
Reduce/Sell	0

The activity of the Bank's investor relations is to enable to make a reliable evaluation of the Bank's financial situation, its market position and business model effectiveness in the context of banking sector conditions and macroeconomic situation in the domestic economy as well as on international markets.

Relevant information for the investors about the Bank is available on the Bank's website:
https://www.pekao.com.pl/en/investors-relations.html

The Principles_of_information_policy.pdf is available on the Bank's website.

Contact details for the Investor Relations Office: e-mail: bri@pekao.com.pl

6.5 Financial credibility ratings

Bank Pekao S.A. financial credibility ratings

Bank Pekao S.A. co-operates with three leading credit rating agencies: Fitch Ratings (the Fitch), S&P Global Ratings (S&P), and Moody's Investors Service. In the case of the first two agencies, the ratings are provided on a solicited basis under relevant agreements and with respect to Moody's Investors Service the ratings are unsolicited and they are based on publicly available information and review meetings.

As of 31 December 2025, Bank Pekao S.A. had assigned following financial credibility ratings:

FITCH RATINGS	BANK PEKAO S.A.	POLAND
Long-Term Default rating (IDR)	BBB+	A-
Short-Term Default Rating	F2	F1
Viability Rating	Bbb+	-
Government Support Rating	No support	-
Outlook	Stable	Negative
National Long-Term Rating	AA-(pol) (stable outlook)	-
National Short-Term Rating	F1+(pol)	-
S&P GLOBAL RATINGS	**BANK PEKAO S.A.**	**POLAND**
Long-term rating in foreign currencies	A-	A-
Long-term rating in domestic currency	A-	A
Short-term rating in foreign currencies	A-2	A-2
Short-term rating in domestic currency	A-2	A-1
Stand-alone credit profile	bbb+	-
Outlook	Stable	Stable
Rating of Senior Preferred series SP2 bonds	A-	-
Rating of Senior Non-Preferred series ESN1 eurobonds	BBB	-
Rating of Senior Non-Preferred series ESN2 eurobonds	BBB	-
Rating of Senior Non-Preferred series SN3 bonds	BBB	-
S&P GLOBAL RATINGS (RESOLUTION COUNTERPARTY RATING)	**BANK PEKAO S.A.**	**POLAND**
Long - term RCR in foreign currencies	A	-
Short - term RCR in foreign currencies	A-1	-
Long - term RCR in domestic currency	A	-
Short - term RCR in domestic currency	A-1	-
MOODY'S INVESTORS SERVICE (UNSOLICITED RATING)	**BANK PEKAO S.A.**	**POLAND**
Long-term foreign-currency deposit rating	A2	A2
Short-term deposit rating	Prime-1	Prime-1
Baseline Credit Assessment	baa2	-
Long-term counterparty risk assessment	A2(cr)	-
Short-term counterparty risk assessment	Prime-1(cr)	-
Outlook	Negative	Negative
Long-term Counterparty Risk Rating (CRR)	A2	-
Short-term Counterparty Risk Rating (CRR)	Prime-1	-

The history of rating changes is available on the Bank's website: https://www.pekao.com.pl/en/investors-relations/bonds-and-ratings/ratings.html

Bank Pekao's position in ESG ratings and indices

The Bank's involvement in ESG activities is assessed by the market in international rankings and indices. The Bank's priority is to increase its position in the rankings regarding activities for the environment, society and corporate governance, resulting from the systematic undertaking and disclosure of activities in the ESG area. More information is available on the Bank's website: https://www.pekao.com.pl/esg/ .

The Bank's website also includes the:
https://www.pekao.com.pl/dam/ESG/PAI/Statement_concerning_Principle_Adverse_Impacts_for_year_2025.pdf

Pekao Bank Hipoteczny S.A. financial credibility ratings

Pekao Bank Hipoteczny S.A. (Pekao BH) cooperates with the international rating agency Fitch Ratings. Fitch emphasizes that Pekao BH's rating is linked to the rating of Bank Pekao S.A., which holds 100% of Pekao BH's shares. According to Fitch, Pekao BH's rating is influenced by the level of integration with its parent entity, the scale of its operations, and the Bank's capital. More information is available on the Pekao Bank Hipoteczny website: https://www.pekaobh.pl/relacje-inwestorskie/raporty-ratingi.html

7. Activity of Bank Pekao S.A. Group

7.1 Bank Pekao S.A. on the Polish banking market

HISTORY AND MARKET POSITION OF BANK PEKAO S.A.

Bank Pekao S.A. is one of the oldest and largest banks in Poland and has been operating continuously since 1929. Since its inception, the Bank has played an important role in providing services to Poles in Poland and abroad and in the development of the domestic financial sector. Over the course of more than 90 years, Bank Pekao S.A. has undergone significant structural and strategic changes – from an institution focused on servicing emigration, through mergers and consolidation processes in the 1990s, to its stock exchange debut and integration with international capital groups.

HIGHLIGHTS	
1929	Bank Polska Kasa Opieki S.A. was established in Warsaw on the initiative of the Ministry of Treasury. The aim was to provide services to Poles living abroad and to support emigration processes. In the following years, the business expanded into foreign markets, opening branches in key cities such as New York, London, Paris and Buenos Aires.
1939–1945	The Bank's activities were limited during World War II, Some of the operations were carried out outside the country.
1946	Bank Pekao S.A. resumed operations in Poland after the end of the war.
1991	The first brokerage office of Bank Pekao (Central Brokerage House) was opened.
1996	The Pekao S.A. banking group was established with the participation of Bank Depozytowo-Kredytowy S.A. in Lublin, Pomorski Bank Kredytowy S.A. in Szczecin and Powszechny Bank Gospodarcze S.A. in Łódź.
1998	Debut of Bank Pekao S.A. shares on the Warsaw Stock Exchange.
1999	Bank Pekao S.A. became a part of the international UniCredit Group.
2007	A legal merger of Bank Pekao S.A. with a separated part of Bank BPH S.A. was carried out, which significantly strengthened the Bank's position on the market and increased the scale of its operations.
2017	PZU S.A. and Polish Fundusz Rozwoju S.A. acquired a 32.8% stake in Bank Pekao S.A., the Bank's return to the Polish capital group.
2025	The Bank's Strategy for 2025–2027 **"… the only way is up!"**

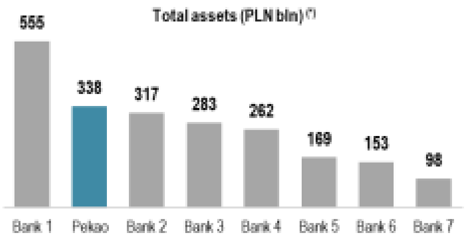
Bank Pekao S.A. is a modern, universal commercial bank, offering a full range of banking services to individual clients, enterprises and institutions. The Bank operates mainly on the domestic market.

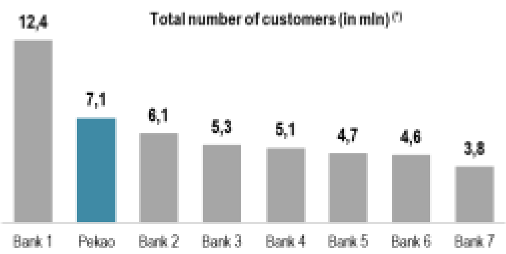
The Bank Pekao S.A. Group includes financial institutions operating on the following markets: banking, asset management, brokerage services, investment and transaction advisory, leasing and factoring. Since 2017, Bank Pekao S.A. has been part of the PZU S.A. Group, the largest financial institution in Central and Eastern Europe. The Bank offers products and services competitive on the Polish market, a high level of customer service and a well-developed distribution network.

A wide range of products, innovative solutions and an individual approach to the customer ensure comprehensive financial services, and the integrated service model provides the highest quality services to customers and ensures optimal adaptation to changing needs.

The Bank Pekao S.A. Group actively cooperates with international financial institutions, such as the European Investment Fund (EIF), the European Bank for Reconstruction and Development (EBRD), the Council of Europe Development Bank and the International Finance Corporation (IFC). Thanks to cooperation with foreign international institutions, both the Bank and the Group companies can offer attractive financing terms to clients, including SMEs, and support the development of their investment activities. This cooperation strengthens the stability of financing sources and increases the financial opportunities available to the Group's customers.

Bank Pekao S.A. is one of the largest financial institutions in Poland in terms of the value of assets, the number of customers and an extensive distribution network. At the end of 2025, we served a total of 7.1 million customers, including 6.7 million individual customers, offering them access to modern financial products and services.





(*) Data as at 30 September 2025 – own study.

KEY INTANGIBLE RESOURCES

New Technologies, Software, Licences
We continue to expand our use of modern technologies that enhance the Bank's operational efficiency and streamline key processes. We are consistently investing in digital solutions such as PeoPay, Pekao24, and PekaoBiznes24, which ensure convenient access to services via remote channels and improve service quality. We are laying strong foundations for operating in a Data Driven model by integrating our data environment to enhance business efficiency. We are also advancing initiatives to implement next-generation conversational banking. At the same time, we are systematically deploying solutions that improve the work environment through the use of advanced artificial intelligence technologies.

Bank Brand and Client Relationships
A strong, highly recognisable brand and a comprehensive product offering reinforce the Bank's market position and foster client loyalty. We build long-term client relationships based on the principles of the client experience management model introduced in 2025. This model is grounded in delivering professional, transparent and empathetic service – regardless of clients' financial needs, life stage or preferred contact channel. We focus on security, trust, responsiveness to signals, and anticipating client needs. Insights gained from internal and external research, as well as complaints, are used consistently to raise service quality and design solutions aligned with actual client expectations. We pay particular attention to understanding client needs across life stages. For our youngest clients, we offer savings products and accounts, including the gamified PeoPay KIDS app, which supports financial literacy. We are continuously enhancing our value proposition for Young clients (under the age of 26), addressing their lifestyle and passions. We also cater to individual and private banking clients by offering deeply personalised products and services. Drawing on our specialists' experience and expertise, we provide comprehensive solutions for businesses. These actions contribute to a steady improvement in how Pekao is perceived by clients, as reflected in higher satisfaction scores, an improved NPS, and favourable market publications.

Strategic Cooperation within the Pekao Group and PZU Group
We continue to develop our cooperation with the PZU Group, strengthening our position in the bancassurance market and offering clients comprehensive insurance solutions. We integrate leasing and factoring services within the Pekao Group to provide complete financial support, particularly for micro, small, and medium-sized enterprises. Consistently pursuing synergies from this collaboration enhances the Bank's offer and supports revenue diversification.

Employee Competencies and Organisational Culture
We support the development of employee competencies and an organisational culture that promotes decisiveness, agility, and openness to innovation. An aspirational work culture enables efficient operations and the implementation of modern solutions within the Bank. This is evidenced by the Friendly Workplace 2025 certificate awarded to the Bank in recognition of initiatives that support workplace comfort and employee development. These actions contribute to an environment where our values – Simply, Together, Courageously, Responsibly, With Determination, Openly, Honestly – form the foundation of all our activities.

Corporate Governance System and ESG
ESG is an integral part of the Bank's business strategy. We operate based on high standards of corporate governance, which ensure transparency and responsible management. Within ESG, we focus on supporting clients in achieving their sustainable development goals, including through financial products and solutions that account for environmental and social factors. The Bank also undertakes activities to promote the sustainable development of its own operations, including the successful issuance of further green Eurobonds.

Summary
The Bank's value creation chain is built on the integrated use of key intangible assets that support the execution of our strategy and strengthen our market position. Central to this are the development of digital platforms, a data ecosystem and AI technologies, which enable process automation, intelligent information analysis, and the implementation of innovative solutions such as next-generation conversational banking. These technologies improve operational efficiency and enable service personalisation, leading to higher client satisfaction. The Bank's strong brand and long-term client relationships – built on trust and accessibility – represent another value driver, supported by a comprehensive product offering and innovative remote channels (PeoPay, Pekao24, PekaoBiznes24). Strategic collaboration within the Pekao Group and PZU Group expands the service portfolio and diversifies revenue streams. Employee competencies and an innovation-driven organisational culture, combined with high standards of corporate governance and ESG initiatives, ensure responsible management and support sustainable growth. The integrated use of these elements enables the Bank to create value for clients, shareholders, and society, reinforcing its position as a modern, responsible financial institution.

BUSINESS MODEL

The Bank’s business model is based on customer segmentation with the following groups of customers:

- **RETAIL BANKING AND PRIVATE BANKING** – serving individual clients, including affluent private banking clients and micro enterprises. Private banking clients are offered investment advisory through private banking centers and remote channels, while all individual clients and micro-enterprises are served through a wide network of branches and partner outlets supported by market-leading remote service channels, including digital channels,
- **ENTERPRISE BANKING** – providing financial services to clients from small and medium-sized enterprises sector that are served by relationship managers with the support of product specialists. The service is carried out in specialized Business Customer Centers, Corporate Centeres and universal retail branches. Customers are offered with products and services tailored to their individual needs based on solutions proven in corporate banking and adapted to the needs of the enterprise segment,
- **CORPORATE AND INVESTMENT BANKING** – providing financial services to large enterprises (segmentation by revenues of companies), public sector entities, financial institutions and entities from the commercial real estate financing sector. Corporate and investment banking clients are served by relationship managers with the support of product specialists.

Distribution channels

The Bank offers its customers with a nationwide wide distribution network including its own and partner branches, a network of ATMs with convenient access throughout the country, a professional call center and modern online and mobile banking platforms for individual and corporate customers as well as the segment of small and micro enterprises.

In our branch operations, we place particular emphasis on comfort and accessibility. We apply standards of service for customers with disabilities, facilitate the identification of available facilities using a search engine and provide the possibility of entering branches with a guide dog. The Bank also provides transparent information on the availability of car parks at its branches.

	31.12.2025	31.12.2024
Total number of outlets	560	573
own outlets	473	478
partner branches	87	95
Total number of own ATMs	1,363	1,314

The number of accounts

At the end of December 2025, the Bank maintained 8,928 thousand PLN denominated current accounts, 333 thousand mortgage loan accounts and 572 thousand “Pożyczka Ekspresowa” (Express Loan) accounts.

(in thousand)

	31.12.2025	31.12.2024
Total number of PLN current accounts (*)	8,928	8,706
of which packages	6,192	6,013
Number of mortgage loans accounts (**)	333	346
of which PLN mortgage loans accounts	321	331
Number of Pożyczka Ekspresowa loan accounts (***)	572	575

(*) Number of accounts including accounts of prepaid cards.

(**) Retail customers accounts.

(***) Pożyczka Ekspresowa, Pożyczka Ekspresowa Biznes.

The data presented according to the business model based on the managerial model in which the main criterion for dividing the Group's reporting is the classification of the client depending on his profile and service model.

Retail Banking And Private Banking

In 2025, we focused on adapting services for individual customers so that the use of our solutions would be more intuitive and in line with their expectations. We have supported various groups of clients, including younger and professionally active people, by offering them solutions that meet their needs in everyday situations.

Number of clients and accounts
In 2025, we opened a total of 497.5 thousand Kont Przekorzystnych and Świat Premium Accounts, including 172.5 thousand for clients up to 26 years of age, which accounts for 35%. We have maintained high acquisition results and are among the top 5 banks with the highest net account growth year-on-year. Bank Pekao's share in the increase in the number of net accounts on the market amounted to 17% y/y.

The year 2025 was another year in which we maintained high sales of Konto Świat Premium accounts, with a total of 36 thousand accounts dedicated to affluent clients depositing at least PLN 200 thousand on the Bank's savings products. More than 21 thousand of these accounts were opened by new customers.

The most popular account benefits include:

- attractively interest-bearing Konto Oszczędnościowe Premium with promotions for new customers (e.g. 6% up to PLN 200 thousand for 4 months),
- promotion of 10,000 miles under the Miles & More program for the purchase and active use of the "Karty Kredytowej z Żubem",
- access to a wide range of savings and investment products, including the possibility of purchasing Treasury Bonds.

We achieved a record level of client acquisition in the Private Banking segment – nearly 2 thousand new clients. We have also established cooperation with over 300 Family Foundations as part of the Family Office. Since the beginning of Family Office's operation, i.e. since May 2023, we have been servicing a total of less than 700 accounts.

Marketing campaigns for the Konto Przekorzystne and Savings Account
The sales results were significantly influenced by the marketing campaigns conducted in 2025 for the Konto Przekorzystne with a Savings Account with a high interest rate and the "Okazje z Żubrem" discount program. The campaign was carried out on TV, on Internet portals and in social media. We have also made available to our customers a wide and comprehensive package "Supermoce w podróży", including practical solutions supporting convenient payments while travelling, including a novelty on the Polish market - a payment ring that enables contactless payments without a wallet, without a phone and without the need to recharge.

Online Account Promotions
We have carried out successive editions of online account opening promotions. Customers who met the conditions of the promotion, i.e. actively used their debit card and gave marketing consents, could receive attractive bonuses in the form of a transfer to their account, up to PLN 400.

Promotion of PeoPay cards and applications
We actively promoted card sales and the PeoPay application among young customers by introducing new card images inspired by gaming. As part of the Mastercard Bezcenne Chwile program, we have prepared a special catalogue of rewards and a promotion for people registering a card with such an image. Our card lineup has been expanded with 10 new gaming graphics

Marketing with Costa Coffee
In cooperation with the Costa Coffee café chain, we offered the Bank's individual customers with Pekao cards a 50% discount on all beverages prepared by the barista. As part of this, we also carried out a marketing campaign in Costa Coffee cafes, in the Bank's branches, outdoor space in the largest cities in Poland, as well as in online channels and social media.

Children's offer and campaigns
We conducted active marketing activities to support the offer of selling accounts for children and young people. We encouraged parents to set up their child's first account by offering attractive promotions related to opening an account.

We carried out campaigns on the radio, social media, as well as on advertising media located in places where families spend common activities, such as swimming pools or water parks. We offered attractive interest rates in the “Mój Skarb” savings account. In campaigns addressed to children and parents, we consistently emphasize the importance of talking about finances and building good saving habits from an early age.

Educational projects for families – "Bajki Oszczedzajki"
On the occasion of the 5th birthday of the PeoPay KIDS application, together with Empik, we have prepared "Bajki Oszczedzajki" - a series of stories that bring children and parents closer to the basics of financial knowledge in an accessible way. The audiobooks are available on the Bank's YouTube channel and in the Empik Go app.

Back2School Campaign and Educational Materials
As part of the Back2School campaign, we promoted our offer for the youngest. In cooperation with the Fundacją Powszechnego Czytania, the Bank has prepared a children's book entitled "Porwanie Pana Złotówki", which introduces children to the subject of saving in an accessible way and promotes values such as friendship, reason and honesty.

Activities for Teens
For teenagers, we have launched a map of the bank, in one of the most popular games in this age group - in Roblox called "Grow your money". It is an innovative educational space where users learn how to manage their budget and invest, and for their activity they receive rewards in the form of additional in-game gadgets.

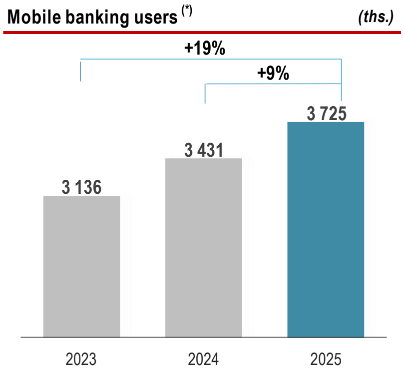
Since its launch, the map has been in high demand and has been played by more than 400 thousand players and more than 800 thousand times. The implementation of the map was also accompanied by the preparation of new images of payment cards inspired by characters from Roblox.

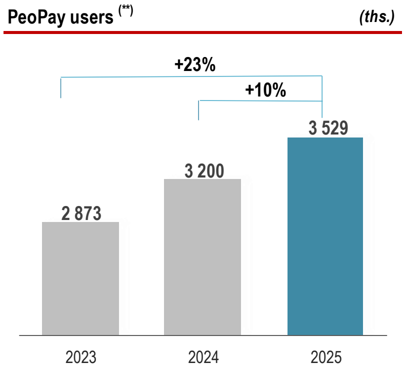
Offer and campaigns for young customers
For customers aged 18 - 26, we have prepared an offer of the Konto Przekorzystne for PLN 0 and we have carried out activities to support their passions related to music and gaming. The Bank was m.in partner of the Bittersweet festival and one of the largest gaming events in Poznań Game Arena.

We continued our partnership with the gaming ambassador and the development of the Money Tycoon map in Fortnite, which was made available to players in December 2024. In addition, we have prepared a guide "ABC oszczędzania", which helps young customers develop the ability to consciously manage their finances and make responsible financial decisions.

By combining financial education with entertainment, we want to inspire young people to consciously manage their finances.

Development of electronic and mobile banking
In 2025, the number of active mobile banking customers increased by 294 thousand to 3.7 million, i.e. +9% more than a year ago and +19% more than two years ago. The number of active mobile customers using the PeoPay application increased by 328 thousand to 3.5 million and was +10% higher than a year ago and +23% higher than two years ago.





(*) Unique user actively using electronic banking is a user who logged in to the system and the mobile service m.pekao24.pl. at least once during the last quarter (in case of using different mobile channels the client is counted only once).
(**) Unique user PeoPay application who logged in to the system PeoPay at least once during the last quarter.

Activation and login improvements

- Simplified activation of PeoPay in the branch – the optimized process enables more efficient and faster implementation of the service in the branch, which translates into more effective bill sales and customer service, as well as supports user mobility,
- Optimising the identity verification process on a selfie, increasing the convenience and effectiveness of remote identification,
- Logging in to Pekao24 without a password – on trusted devices, it is enough to approve logins in PeoPay or using a hardware key,
- A new process of activating the PeoPay application with the use of e-ID, ensuring quick and safe launch of the application.

Changes in the area of security

- Notification Center in PeoPay: introduction of a dedicated section for security messages, thanks to which the customer has constant access to the received alerts,
- CyberRescue – round-the-clock assistance in the area of cybersecurity and ongoing notifications about threats and methods of fraudsters,
- Behavioural protection – analysis of the way of typing, moving the cursor or gestures on the screen allows you to create an individual behavioural profile of the customer and increase the security of their data and funds in electronic banking,
- Automatic generation of a consultant's authorization card – confirmation of the identity of the hotline consultant directly in the application, which increases the security of contact with the Bank.

Improving the ergonomics and appearance of the application

- New Peako24 dashboard – refreshed appearance and significant improvement of the website's usability,
- Live Activities – the ability to track the validity of tickets and parking time in real time in the PeoPay application,
- "Twoje Sprawy" section in the PeoPay application – introducing a single place for the processing of all the most important banking matters,
- Changes resulting from the WCAG Accessibility Act: adapting the website and applications to the requirements increasing accessibility for all users.

Changes to transfers

- Sorbnet transfer – adaptation of the process to the new regulations introducing the SORBNET3 system,
- Serial transfers, enabling the execution of multiple transfers in one order,
- Series of split payment transfers, enabling the execution of multiple transfers at the same time in the Pekao24 service.

New features

- Payment rings – enabling payments to be made with them, thanks to the tokenization of Bank Visa and Mastercard cards (both debit and credit),
- - e-vignettes for the purchase of electronic vignettes for motorways and roads in Bulgaria, the Czech Republic, Slovakia, Slovenia, Switzerland and Hungary.

Key retail loans: PEX cash loans and mortgage loans

PEX cash loans

In 2025, we achieved very good sales results in the area of cash loans. The value of cash loans granted amounted to PLN 7.4 billion in net volumes, i.e. +17% compared to 2024. The gross value of the new contracts reached PLN 8.9 billion. i.e. +21% y/y.

High sales and a high share of net volume in the value of signed agreements (new financing granted to customers) translated into an increase in the value of the cash loan portfolio by +13.1% y/y, with slightly higher dynamics compared to the banking sector.

In 2025, we achieved record sales of cash loans granted electronically - PLN 6.0 billion, i.e. +25% y/y. We are consistently increasing the share of loans granted remotely through the Pekao24 service, the PeoPay mobile application and via the Bank's online.

We develop sales processes, focusing on the comfort of customers by implementing new loan offers and solutions that simplify obtaining financing, transferring loans from other banks and at the same time increasing the level of security.

In 2025, we implemented new solutions to make it easier for customers to take advantage of cash loans, including:

- increasing the limit of a loan available without the consent of the spouse to the amount of PLN 100 thousand,
- a new model of Risk Based Pricing, which allows you to offer a lower price to customers with the best risk profile,
- new consolidation processes, facilitating the transfer of the loan to Bank Pekao or the combination of repaid installments in Pekao, which allows to reduce the amount of repaid installments or obtain additional financing,
- new CPI insurance for cash loans with a regular premium,
- maintaining very competitive price conditions of credit offers.

Bank Pekao S.A. is the only bank in Poland that offers loans to finance tuition fees for paid medical studies. Students can apply for a loan at the beginning of each semester and take advantage of interest rate subsidies, a guarantee granted by BGK, and the possibility of full or partial redemption. So far, almost 5.7 thousand customers have benefited from the loan, for a total amount of over PLN 1.26 billion, of which we have already released almost PLN 420 million for the semester tranches of the loan.

Mortgage loans

In 2025, sales of housing loans reached PLN 10.8 billion, i.e. an increase of 35% y/y compared to PLN 8.0 billion in sales of standard loans obtained in 2024 (excluding PLN 3.3 billion of loans under the Safe Loan 2% offer sold in 2024 under the government's housing support program). The achieved sales results allowed us to achieve our sales targets.

We have been updating our mortgage loan offer on an ongoing basis and adapting it to the changing conditions and market needs in order to keep it among the best offers on the market. The offer has been extended, m.in, to include an offer for uniformed services, for customers refinancing loan liabilities from other banks. We also introduced preferential terms for loans above PLN 500 thousand, which allowed us to reach wealthier customers from larger cities with more specific financial needs.

In October 2025, we introduced a new PZU Dom home insurance offer, available both as a product linked to a mortgage loan and as a stand-alone offer for all clients.

Digitization of the mortgage process remains one of the key directions of the Bank's development, and intensive activities in this area are planned in the coming months. An important element of this transformation is the new mortgage process, the production version of which was launched at the end of 2025. In the first stage, we implemented it in selected macro-regions, while at the beginning of the first quarter of 2026, the process will be successively made available to other regions, and then also to intermediaries.

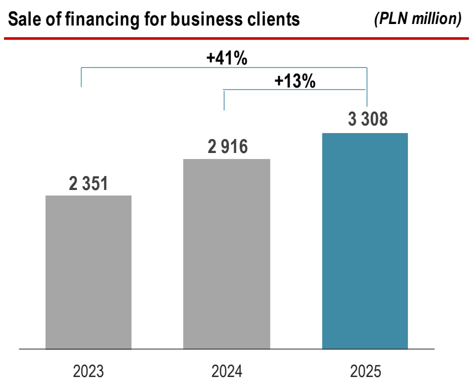
The Bank's activities are appreciated and rewarded. We became the winner of the "Złoty Bankier" ranking in the category of mortgage loans – as a "Hipoteczny multitool". The Bank has been described as a multi-tasking mortgage that offers a full package of proposals in terms of the interest rate formula and the amount of the required own contribution, also being at the forefront in terms of amounts available to the customer and borrowing costs.

In 2025, we transferred part of our mortgage loan receivables to Pekao Bank Hipoteczny. The total number of loans transferred so far is over 18.5 thousand with a value of over PLN 3.9 billion.

Business clients loans

Acquisition and sale of financing

In 2025, new sales of financing to business customers in total (loans, leasing and factoring) amounted to PLN 3.3 billion and were higher by +13,5% y/y. Sales of bank loans in the business segment amounted to PLN 1.4 billion.



Development of digital channels and self-service processes
Bearing in mind the growing expectations and needs of business customers, the Bank has consistently developed digital channels and self-service solutions. A key element of the activities was the further digitization of processes and increasing the availability of the credit offer in online and mobile banking.

Credit offer and sales support activities
We continued our strategy of developing sales of credit products in remote channels. We have prepared for our clients the possibility of obtaining attractive financing terms of up to PLN 300 thousand, in a simple and quick credit procedure. Pre-limit solutions, which shorten the time needed to raise funds, were a great facilitation.

For clients with liabilities in other financial institutions, we have prepared a special consolidation offer. It allows you to put your finances in order and take advantage of preferential conditions and strengthen your relationship with the Bank as your first choice bank.

We supported sales with solutions enabling the settlement of liabilities from other banks, seasonal promotional offers, such as "Zima" and "Wiosna taniej online", as well as cooperation with sales partners. These measures have increased the availability of credit offers and improved the customer experience. In the business customer segment, we carried out intensive work related to optimization and digitization processes. The result of this work is a simplified and fast credit process, also available in remote channels.

Development in the area of insurance products
In 2025, we expanded our offer with two new insurances available in all distribution channels:

- CPI with regular premium linked to the PEX product,
- PZU DOM real estate insurance with a wide range of protection, available both as part of a mortgage loan and in the standalone formula as a standalone product,

In the service area, we have introduced solutions that improve the quality of customer service. One of them is the optimization of the claims process, which translates into more efficient service and shorter time of case processing. We supported sales with marketing activities and personalized communication using CRM. Thanks to these activities, we have strengthened the knowledge of our insurance offer and current promotions, especially regarding travel and motor insurance during the holiday season.

Our insurance offer was becoming more and more popular among customers, and we achieved high sales dynamics y/y in insurance not related to banking products. The number of standalone policies sold in 2025 was 80% higher y/y. The dynamics of sales of automotive/motor insurance amounted to +58% and travel insurance +86% y/y.

A large increase in policy sales was recorded in remote channels, where the number of concluded contracts was almost twice as high as in 2024.

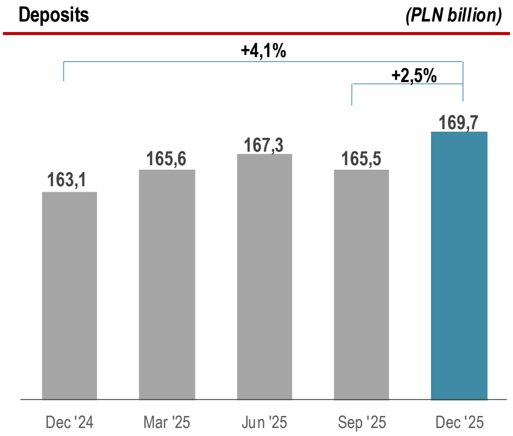
The share of the number of mortgage loans sold with insurance (for which such an offer could be available) remained at a stable high level of 94,2%. In the case of the number of cash loans sold, this share amounted to 34,3%.

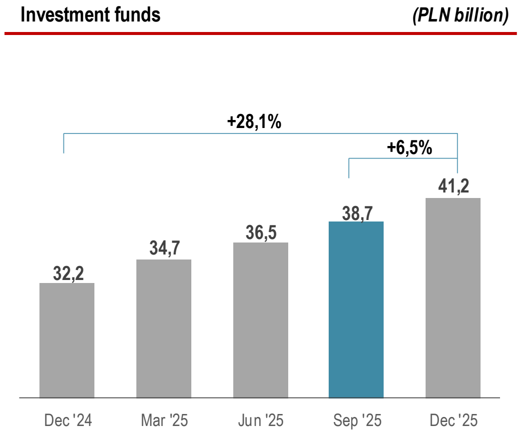
In 2025, we sold insurance policies generating over PLN 820 million in GWP, which is an annual record for Pekao's bancassurance business.

Our share in the bancassurance market at the end of 2025 is 16.2%

Deposit, brokering activity and sale of investment products
Our savings offer was very popular among customers. At the end of December 2025, the total value of deposits held by retail customers (including Private Banking customers) and business customers reached PLN 169.7 billion, representing an increase of PLN +6.7 billion (+4.1%) compared to the end of 2024.

The value of assets invested in TFI Pekao's products and certificates of deposit increased to PLN 35.9 billion, up by PLN +7.5 billion (+26.5%) compared to the end of 2024.





In 2025, savings accounts were very popular among individual customers, including cyclical promotions for new customers and holders of Savings Accounts and Premium Savings Accounts with an attractive interest rate of 7.0% for 4 months up to PLN 100 thousand. which translated into an increase in the total balance on savings accounts by the end of December 2025 by almost than PLN 2.1 billion (+7.5%).

For clients who prefer traditional forms of investing funds, we offered a wide range of term deposits with attractive interest rates. Deposits were available both in remote channels (e.g. Lokuj z Nami deposits, Lokata dla Ciebie deposits) and in branches. Customers were also interested in savings products for children up to 18 years of age, including Moj Skarb accounts and Skarbonki, which allow you to save for specific purposes.

In 2025, we achieved record net sales of investment products of PLN 19.3 billion, compared to PLN 17.5 billion in 2024. Clients interested in investing their savings in investment products had access to a wide range of Pekao TFI funds, products combining the advantages of deposits and investments (Deposit with a Fund and Investing Deposit) and to numerous issues of structured products with full capital protection available in three currencies: PLN, EUR and USD.

In 2025, there was also a very high interest in retail Treasury Bonds, which constituted an important element of the offer.

We supported the process of self-purchase of investment products in remote channels in the application through periodic offers with preferential price conditions. As a result, the number of customers who purchased investment products in the PeoPay application and in the Pekao24 service grew systematically.

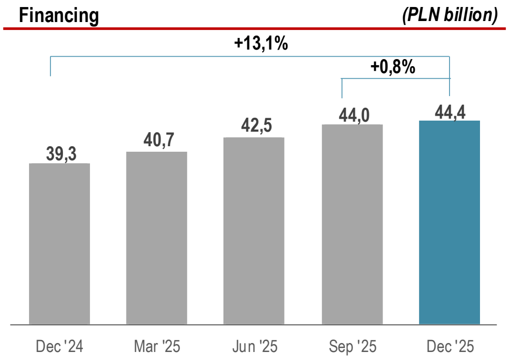
Enterprise Banking

Corporate banking includes the small and medium-sized enterprises (SMEs) segment and the mid-sized corporations (MID) segment.

In 2025, we continued our efforts in the field of automation and digitization, also developing new functionalities in electronic banking and increasing the scope of customer self-service. By focusing on streamlining processes and improving the quality of service, we strengthened our competitive advantages in the SME and MID segments, which allowed us to further strengthen the Bank's position on the market.

Lending activities and customer financing

We provide our clients with a wide and comprehensive financing offer, including loans, leasing, factoring, organization of issues and other specialized forms of financing tailored to the needs of companies. The value of new loans sold (excluding renewals) in the SME segment reached PLN 7.7 billion, up +16% y/y, while in the MID segment the value of new loans sold amounted to PLN 16.0 billion (+19.5% y/y).



As at the end of December 2025, the volume of the total loan portfolio (loans, leasing and factoring) amounted to PLN 44.4 billion and was higher by PLN 5.1 billion y/y (by 13.1%). The increase in the volume of the financing portfolio was recorded in both the MID and SME segments.

Customer acquisition

In 2025, we acquired 2.8 thousand customers in the SME segment and 1.1 thousand new customers in the MID segment (+26% y/y).

We have implemented relational acquisition initiatives to support the development of cooperation. Together with the Warsaw Stock Exchange and the Dom Maklerski Pekao, we organized a series of meetings "Z Żubrem na giełdę", promoting the activity of enterprises on the capital market.

We conducted a regional series of workshops "Zrównoważony kierunek – od trendów do przewagi konkurencyjnej", during which we presented the current regulatory framework, practical case studies and available forms of financing for the transition to sustainable development to companies.

Implementations and product changes

In 2025, we signed an agreement with the European Investment Fund (EIF) under the InvestEU programme, which enables the granting of preferential financing with a total value of over PLN 1.25 billion, with guarantees securing up to 80% of the loan amount granted by the Bank. As a result of this cooperation, we have introduced new EIF guarantee instruments to our offer:

- The InvestEU Green Guarantee, supporting projects in the area of sustainable development,
- The InvestEU SME Guarantee, aimed at boosting the competitiveness of small and medium-sized enterprises.

We have expanded the availability of mortgage loans and SMEX express loans for customers from the small and medium-sized enterprise sector. As a result, more companies have been able to take advantage of flexible forms of financing tailored to their needs.

We have increased the limit for guarantees under the Investmax programme, which has allowed SME clients to obtain higher credit collateral and increase the scale of their investments.

We have introduced credit products based on the POLSTR index, providing customers with access to financing based on the new benchmark.

We carried out activities aimed at optimising key credit processes, which translated into an increase in efficiency and a reduction in the time it takes to issue a credit decision.

We continued to develop remote service channels. We have made available to our customers the revitalized PekaoBiznes24 system and the new PeoBIZ 2.0 mobile application, which significantly improve the quality of service by increasing intuitiveness and functionality.

We have expanded the functionalities related to customer onboarding in remote and stationary channels. As a result of the measures taken, the digitization rate for the SME, MID and Corporate segments reached a level in 2025 10 p.p. higher than in the previous year.

Security, Development and Transformation Initiatives

As part of the European Cybersecurity Month, the cyberPEKAO Academy was held – an educational event under the slogan "Man is the best firewall". The meeting brought together experts in the field of finance, technology and digital security. Participants exchanged knowledge, experiences and best practices, which strengthened joint efforts to be resilient to today's cyber threats.

We have signed an agreement with the Industrial Development Agency, which supports enterprises and the development of investments in key sectors of the economy. The cooperation includes joint financing of projects, development of business relationships and training programmes for employees of both institutions.

Together with the Polish Chamber of Commerce (KIG), we have started activities to support small, medium and listed MIDcaps companies in the green transformation. The initiative includes education, dedicated financial solutions and the "Sustainable Business with Bison" platform, where we provide materials, guides and news. Entrepreneurs also gain access to free webinars conducted by Pekao and KIG experts.

Corporate And Investment Banking

The Corporate Banking includes corporate segments, significant capital groups (the so-called large corporations), public sector clients, financial institutions as well as commercial real estate, specialized financing and customers of the Brokerage Office Centre. The Pekao Group is a leader in serving these segments. It has a competitive advantage resulting from experience, unique staff, specialized knowledge and processes and the potential to co-finance large projects based on a very strong liquidity and capital position. The Bank provides both the comprehensive services of a universal bank and the services in such areas as leasing, factoring, investment advisory services, advisory in M&A as well as highly advanced treasury, capital market products and custody services. A wide range of products and services, innovative solutions, customised approach and the comprehensive financial services for the largest enterprises, institutions and public sector units are appreciated by clients and determine the strength of corporate banking of Bank Pekao S.A.

Clients

At the end of September 2025 we served over 7 thousand corporate clients. We provide support in terms of substantive, operational and financial development of our clients both in everyday business as well as in large strategic projects.

Investment banking, structured finance and commercial real estate

We offer our clients the services in the field of investment banking, structured finance and financing of commercial real estate projects, including financing of the construction of warehouses.

The key projects financed by the Bank in 2025 include:

- co-financing the construction of further wind farms in the Baltic Sea; the amount of financing amounted to over EUR 6 billion,
- granting financing to a leading European company operating in the e-commerce and courier industry; the syndicated loan amounted to EUR 4.2 billion,
- granting a syndicated loan to the Polish champion of the mining industry; the amount of financing amounted to USD 1.5 billion. The funds will be used for further development of business activity,
- granting financing to a company which holds a leadership position in the clothing industry in Poland; the amount of financing amounted to EUR 505 million and 2.8 billion zlotys,
- granting a syndicated loan to finance the current operations of a leading company from the Polish energy industry and to finance the construction of CCGT power blocks with a nominal gross electric power capacity of 668Mwe; the amount of financing amounted to 6.45 billion zlotys,
- granting syndicated financing to a leading company from the e-commerce industry in Poland; the amount of financing amounted to 6 billion zlotys,
- granting syndicated financing in the form of a revolving credit line (RCF) to one of the largest energy companies in Central and Eastern Europe. The purpose of the financing was to finance the general corporate needs of the Group and its entities, including the financing of potential acquisitions. The total amount of funding amounted to EUR 740 million,
- granting syndicated financing for the development of fibre optic infrastructure; the financing amounted to 3.7 billion zlotys,
- granting a syndicated loan for the construction of a CCGT power block with a nominal gross electric power capacity of 563MWem; the amount of financing amounted to 2.2 billion zlotys,

- participation in a syndicated loan arranged for a leading European company involved in glass processing; the total amount of financing amounted to approximately EUR 480 million,
- arranging syndicated financing for the refinancing and development of the retail network in Central and Eastern Europe; financing amounted to EUR 300 million,
- granting a syndicated loan to a leading company operating in the retail industry; the amount of financing amounted to 875 million zlotys,
- granting syndicated financing for the construction of an offshore wind farm with a target capacity of 390 mW; the amount of financing amounted to EUR 1.8 million and 566 million zlotys,
- granting syndicated financing to a capital group managing a chain of four-star hotels in Poland. The funds raised were used to refinance the existing debt and to meet the Group's general needs. The total amount of funding amounted to EUR 134 million.

Issuance of debt securities

In 2025, the Bank participated in the issuance of non-treasury debt securities (of corporate entities, banks and municipal units) for the total amount of more than 62.1 billion zlotys, of which the following transactions deserve special attention:

- issue of 13 series of bonds of Pekao Leasing for a total amount of over 7.5 billion zlotys and the issue of 41 series of bonds of Pekao Faktoring for a total amount of over 27.4 billion zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of 8 series of bonds of Pekao Leasing for a total amount of over 4 billion zlotys and the issue of 18 series of bonds of Pekao Faktoring for a total amount of 12.4 billion zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of 4 series of bonds of Pekao Leasing for a total amount being the equivalent of over 2.2 billion zlotys and the issue of 11 series of bonds of Pekao Faktoring for a total amount of over 8 billion zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of 6 series of bonds of Pekao Leasing for a total amount of over 3.5 billion zlotys and the issue of 12 series of bonds of Pekao Faktoring for a total amount of over 7.7 billion zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of two series of bonds held by the issuer, including the subordinated Tier 2 equity bonds in the amount of 750 million zlotys in the 10nc5 format on the domestic market, and the senior non-preferred bonds in the 6nc5 format in the amount of EUR 500 million on the international market. the Bank acted as a coordinator and dealer in both transactions,
- issue of the Bank's senior green bonds in the 7nc6 format in the amount of EUR 500 million on the international market, in which the Bank acted as a coordinator and dealer,
- issue of subordinated Eurobonds (Tier 2) of the Bank in the 10.25nc5.25 format in the amount of EUR 500 million, in which the Bank acted as a global coordinator and joint bookrunner,
- issue of 7-year bonds for an integrated multilateral financial institution in the amount of 2 billion zlotys, in which the Bank acted as a coordinator, co-arranger and dealer,
- issue of 7-year bonds for a company which is one of the world's largest producers of copper and silver in the amount of 1.6 billion zlotys, in which the Bank acted as a co-arranger and dealer,
- issue of 5 series of bonds of Pekao Bank Hipoteczny for a total amount of over 1 billion zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of 5-year bonds for a company operating in the employee benefits sector in the amount of 1 billion zlotys, in which the Bank acted as a co-arranger and dealer,
- issue of 5-year bonds linked to sustainable development for a retail company in the amount of 1 billion zlotys, in which the Bank acted as the arranger, coordinator and dealer,
- issue of 7-year Eurobonds for a multilateral financial institution with the highest rating for a total amount of 1 billion zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of 5-year bonds in the amount of 1 billion zlotys for a shopping platform which is one of the largest e-commerce companies in Europe, in which the Bank acted as an additional dealer,
- issue of 5-year green bonds for a company from the telecommunications industry in the amount of 700 million zlotys, in which the Bank acted as the arranger and dealer,
- issue of 3-year bonds for a leasing company belonging to a global automotive concern in the amount of 600 million zlotys, in which the Bank acted as the coordinator and dealer,

- issue of 5-year green bonds for a retail company in the amount of 600 million zlotys, in which the Bank acted as the arranger and the dealer,
- issue of 2 series of 4-year mortgage covered bonds of Pekao Bank Hipoteczny S.A. for the total amount of 500 million zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of 3-year bonds for a leasing company belonging to a global automotive concern in the amount of 500 million zlotys, in which the Bank acted as the sole arranger and dealer,
- issue of 2.5-year bonds for the leasing company belonging to an international financial group in the amount of 200 million zlotys. The Bank was the sole arranger and dealer.

Cooperation with financial institutions and custody services
We hold a leadership position in serving domestic financial institutions. We focus on providing the highest quality services to insurance companies, investment funds, brokerage houses, financial sector infrastructure entities, cooperative banks as well as savings and credit unions. Our offer includes modern transactional banking products, clearing products, treasury products, custody services and services of a depository bank.

In 2025, we were increasing our market share in custody services and depositary banking in Poland thanks to growing assets, including further acquisitions.

In September, we began a long-term cooperation with the International Finance Corporation (IFC) from the World Bank Group. We concluded an agreement concerning the possibility of IFC participating as an investor in selected bond issues of Bank Pekao. The IFC's commitment will amount to USD 250 million, and these funds will be fully allocated to finance the pro-environmental projects, including the so-called ‘blue financing’, such as improving water usage efficiency.

In the second half of 2025, we guaranteed financing for Pekao Leasing in the form of loans granted by development banks:

- EUR 35 million - loan tranche from the European Bank for Reconstruction and Development (EBRD). Around 60% of the funds will be used to finance green investments, including projects to improve energy efficiency, resource and water efficiency, develop renewable energy and reduce waste,
- EUR 125 million - the second tranche of the loan granted by the Council of Europe Development Bank (CEB) intended to finance investments and development of micro, small and medium-sized enterprises in Poland.

We cooperate with banks from all over the world. We have more than 1.3 thousand exchanged swift keys. We have a direct or indirect access to major clearing systems. We maintain nostro and loro accounts for a very large group of foreign banks. We have the infrastructure to ensure efficient foreign settlements in 20 major currencies.

For the thirteenth time, we have won a prestigious ‘Best Sub-Custodian Bank’ award granted by Global Finance magazine, which confirms our leadership position on the Polish custody services market.

Brokerage activity
As at 31 December 2025, the Pekao Brokerage Office maintained a total of over 206,6 thousand investment accounts and 197,5 accounts for retail treasury bonds, which marks an increase of 64% in comparison with the end of 2024, including over 362,9 thousand accounts with active access to services via remote channels. Direct services were provided through a nationwide network of 418 brokerage branches in 385 locations.

As at 31 December 2025, the value of assets of the Pekao Brokerage Office amounted to 78,66 billion zlotys.

Transactional banking
In 2025, in the area of transactional banking we recorded:

- an increase in the number of outgoing foreign transfers by +14,5% y/y and the incoming foreign transfers went up by +6% y/y),
- an increase in the number of processed Direct Debit transactions by +3,1% y/y, with a simultaneous increase of transaction volume of +19.8%,
- an increase in the number of transactions received under Pekao Collect service by +6,5% y/y while the volume of these transactions rose by +3.5%.

In the PekaoBiznes24 Self-Service Zone, we made available a new functionalities which increase the comfort and security of customer service. The range of new functionalities included:

- the application for "Changing the card settings" which allows you to assign or change a phone number for the 3D Secure service and apply for an e-PIN code for online transactions,

- a new version of the application: "Change of statement settings" which allows you, among other things, to specify the frequency of generating statements from current accounts and VAT accounts, enable or disable the provision of separate statements for VAT accounts, and change the form of providing statements from paper to electronic,
- the application for "Changing the limits of credit and charge cards" which allows you to change the card limit for cash, non-cash and online transactions,
- we have expanded the functionality of the Direct Debit (DD) service in terms of authorization and payment processing as well as consent management. Consents are handled in digital form and clients receive a message confirming that the consent was created when the DD is charged for the first time,
- a request for the closure of a VAT account which allows you to submit an instruction to close a VAT account, to indicate another existing VAT account to be linked to settlement accounts, to indicate the account to which the funds from the closed account are to be transferred,
- the application for early capitalisation of interest at the end of the year,
- the application for the consolidation of balances at the end of the year, available only to public sector customers,
- the application that allows you to block and unblock debit and credit cards,
- the application for ordering prepaid cards, including the opening of a new card program, the choice of card image, the setting of limits and the scope of reporting balances or transactions,
- the first templates of product documentation forms which allow clients to independently order changes to their products as part of the general instruction, including: blocking funds for the benefit of another entity, updating the data of representatives and changing the parameters of cards, such as: changing the name of the cardholder on the card, changing the correspondence address, changing the account number for repayment, charging fees or settling card transactions and the form of providing statements.

We made changes to the Autowihdrawal service. The new version of the service provides full automation of order processing. It simplifies the process in the Bank's systems and shortens the time of service in branches.

We have implemented support for cash payments with the use of QR code readers. This solution reduces manual data entry in the Bank's branches for both open and closed deposits in favour of automatic reading of the information from QR codes. Reading data from QR codes speeds up the service process and supports the optimization of the time and costs of cash transactions.

Since June, the Bank's customers have been able to deposit cash in zlotys using debit cards and Cash Card deposits in the Euronet ATM network.

Trade finance

In 2025, we consistently pursued our strategy aimed at developing tools supporting the handling of trade finance products and access channels, including the Online Guarantees and Open Financing Platform systems. As part of these activities, we have provided new functionalities and ensured the highest level of service standards and customer satisfaction.

In 2025, we recorded a double-digit dynamics of growth in the area of granted guarantees and sureties - the amount of new transactions increased by 13% as compared to 2024, whereas the exposure resulting from guarantees and sureties increased by 8% year-on-year.

We also achieved a significant increase in the volume of financial products. The value of newly financed transactions was higher by 23% than in the previous year, and the level of exposure increased by 42%.

As part of the Open Financing Platform (OFP), we financed nearly 113 thousand invoices with a total value of nearly 2.6 billion zlotys, which translated into a 81% increase in the number of transactions and a 23% increase in the value of these transactions as compared to 2024.

The use of modern technological solutions made it possible to make the OFP Loan available to customers. This product uses automatic monitoring of the implementation of selected credit clauses, which increases operational efficiency and process security. Customers have gained the ability to remotely, fully electronically manage the agreement and have the ongoing online access to its parameters.

Cooperation with international clients
We support the expansion of Polish enterprises on both European markets and in developing countries. We offer comprehensive solutions for short and long-term financing and the solutions for hedging risk of international transactions. The Bank's clients can take advantage of the package of the most beneficial financial solutions adjusted to the model of the conducted business activity.

We provide solutions for companies looking for opportunities to finance their investments in green transformation. The clients of Bank Pekao can take advantage of the guarantee program offered by the Export Credit Insurance Corporation (KUKE). This program will facilitate the financing of expenses related to energy transformation and implementation of investment projects which will allow our economy to achieve climate neutrality.

In 2025, the Bank concluded an agreement with the International Finance Corporation (IFC) under the Global Trade Finance Program (GTFP). As a result we can offer our clients carrying out cross-border trade transactions new solutions guaranteed by a financial institution with a AAA rating. The guarantee provided by the IFC includes letters of credit, trade-related promissory notes, bid and performance bonds, advance payment guarantees, and supplier credits for imports of capital goods.

Comprehensive cooperation with public finance sector entities
An important element of our strategy is to finance public sector and municipal projects. We are actively involved in activities related to building and developing Polish infrastructure, including the support for sustainable development of the economy and environmental protection. We render our services and we provide financing to self-government units, municipal companies, institutions of higher education as well as entities established as part of public-private partnership.

We cooperate with 11 out of 12 Polish metropolises (92% market share) and we provide ongoing budget support for six of them. We cooperate with every seventh municipality in Poland. We maintain business relationships with 64% of towns with county rights and we provide ongoing services to every fifth of them. We also cooperate with every fourth county (25%) and with more than a half of provinces (56%). We are a major bank for state universities – more than 50 of them use our services.

7.2 Major areas of activities of the Group's subsidiaries

Summary of companies' financial results

In 2025, the companies of the Pekao S.A. Group generated a net profit of PLN 354 million. Compared to the net profit generated in 2024, it was higher by PLN 163 million, i.e. by 85.3%.

The table below presents the level of net profit of individual consolidated companies in 2025 compared to 2024.

Entity structure of net profit

(mln zł)

	2025	2024	CHANGE
Entities consolidated under full method	**354**	**191**	**85.3%**
Pekao Investment Management S.A. (*)	235	168	39,9%
Pekao Leasing Sp. z o.o.	113	108	4,6%
Pekao Investment Banking S.A.(**)	15	3	>100%
PEUF Sp. z o.o.	14	9	55,6%
Pekao Bank Hipoteczny S.A.	14	5	>100%
Pekao Financial Services Sp. z o.o.	11	10	10,0%
Pekao Faktoring Sp. z o.o.	(54)	(129)	(58,1%)
Other (***)	6	17	(64,7%)
Entities valued under the equity method			
Krajowy Integrator Płatności S.A.	(6)	7	x

(*) Consolidated profit - Pekao Investment Management S.A. prepares consolidated financial statements with Pekao TFI S.A. for the purposes of consolidation of the Pekao S.A. Group.

(**) Consolidated profit - Pekao Investment Banking S.A. prepares consolidated financial statements for the purposes of consolidation of the Pekao S.A. Group with Pekao Inwestycje Dłużne Sp. z o.o.

(***) It includes the results of 4 companies from the Group (Centrum Kart S.A., Pekao Direct Sp. z o.o., Pekao Fundusz Kapitałowy Sp. z o.o., Pekao Property S.A. in liquidation), which conduct ancillary activities in the Group without providing services to external customers.

Business activities of selected companies

Pekao TFI

https://pekaotfi.pl/o-nas/pekao-investment-management

Pekao IM, in which Bank Pekao S.A. holds 100% of shares, is the owner of Pekao Towarzystwo Funduszy Inwestycyjnych S.A. (Pekao TFI).

Pekao TFI, the longest-operating investment fund company in Poland, offers state-of-the-art products enabling investment on the domestic and foreign markets. The Company creates savings programs, including solutions under the third pension pillar, as well as provides portfolio management services and operates Employee Capital Plans. Pekao TFI is included in the ECP register and its offer is available on the www.mojeppk.pl portal.

As at 31 December 2025, the net asset value of Pekao TFI's investment funds (including PPK) amounted to PLN 41,224 million and was higher by PLN 9,035 million, i.e. by 28.1% compared to the end of December 2024, thanks to the favourable situation on the capital markets and falling interest rates, mobilising clients to look for products with potentially higher rates of return than bank deposits. Pekao IM's consolidated net profit for 2025 amounted to PLN 235 million, compared to PLN 168 million in 2024.

Two Pekao TFI funds were awarded for their performance in 2024 with the "Golden Portfolios" statuette in the TFI of the year category awarded by Gazeta Giełdy i Inwestorów Parkiet.

Pekao Leasing

Pekao Leasing - Pekao Leasing Sp. z o.o

Pekao Leasing provides financial services supporting the sale and purchase of fixed assets, i.e. means of transport, machinery and equipment, as well as office real estate – both through operating and financial leases.

The Company cooperates with Bank Pekao S.A. in the sale of leases to customers who are also the Bank's customers. Pekao Leasing, under agreements with the European Investment Bank, the Council of Europe Development Bank and the European Bank for Reconstruction and Development, offers financing for the SME sector on preferential terms, in particular for green projects and initiatives supporting female entrepreneurship. The company also cooperates with Bank Gospodarstwa Krajowego S.A., offering financing of vehicles as well as machinery and equipment secured by a BGK guarantee.

In 2025, Pekao Leasing concluded over 24.6 thousand new contracts. The value of assets leased by the Company amounted to PLN 7,839 million and was higher by 12.5% than in 2024, including: 60% of the assets leased by the Company, 34% by machinery and equipment, 4% by real estate, and 2% by others.

As part of the diversification of financing sources, Pekao Leasing issues bonds. As at 31 December 2025, liabilities under the issued bonds amounted to PLN 9,717 million.

In 2025, Pekao Leasing generated a net profit of PLN 113 million compared to PLN 108 million in 2024. The Company's higher result was achieved thanks to an increase in the value of leased assets.

PeUF

PeUF is a company 100% owned by Pekao Leasing Sp. z o.o. and acts as an insurance agent, providing services in the field of insurance sales.

PeUF provides Pekao Leasing with insurance for newly concluded lease agreements, policies and renewal policies. PeUF's activities include agency services, including policy monitoring, claims settlement and handling of insurance terminations. In 2025, PeUF provided intermediary services to seven insurance companies. The value of commissions from policies sold amounted to over PLN 56 million and was higher by 16.5% than in 2024.

In 2025, PeUF generated a net profit of PLN 14 million, compared to PLN 9 million in 2024. This increase is due to the increased number of policies sold, which was 26.3% higher than in 2024.

Pekao Financial Services

https://www.pekao-fs.com.pl

Pekao Financial Services (PFS) provides outsourcing services as a transfer agent for financial institutions in the field of operational and technological solutions.

PFS specialises in providing services to domestic and foreign investment funds, general and occupational pension funds, as well as entities offering insurance products. The group of fourteen clients served by the Company includes companies with an established market position. PFS is the only company that handles OFE funds using the services of an external transfer agent. In addition, the Company provides accounting services to Pekao Group companies.

In 2025, PFS generated a net profit of PLN 11 million (including the Bank's share of PLN 7 million), compared to a profit of PLN 9 million in 2024. The net result was higher due to an increase in revenues from clients from the investment sector, which is the result of a positive situation on the capital market.

Pekao Bank Hipoteczny

Pekao Bank Hipoteczny (pekaobh.pl)

Pekao Bank Hipoteczny is a specialist bank, focused on granting mortgage loans and servicing assets, using the issue of covered bonds to finance them. As part of the Group's cooperation, portfolios of mortgage loans and bonds of local government units (LGUs) are transferred to Pekao Bank Hipoteczny, which may be used as collateral for covered bonds issued by Pekao Bank Hipoteczny.

In 2025, Pekao Bank Hipoteczny continued transactions of purchase and transfer of mortgage receivables from Bank Pekao S.A. The transferred portfolio of mortgage receivables, for a total amount of PLN 1,167 million, included loans granted in PLN, which were intended to finance the housing needs of natural persons.

The net value of the loan portfolio, including the portfolio of local government bonds, at the end of 2025 amounted to PLN 3,898 million. Loans to individual customers accounted for 84.4% of the portfolio, 14.3% for local government units and 1.3% for enterprises. As a result of the pooling operations of loans from Bank Pekao S.A. to Pekao Bank Hipoteczny, the loan portfolio (together with the portfolio of local government bonds) increased by 9.8% compared to 2024.

In 2025, Pekao Bank Hipoteczny carried out two issues of mortgage covered bonds. As at 31 December 2025, liabilities in this respect amounted to PLN 2,747 million. The Bank also carried out one bond issue with a total nominal value of PLN 200 million. The value of liabilities under issued bonds at the end of the year amounted to PLN 444 million.

In 2025, Pekao Bank Hipoteczny generated a net profit of PLN 14 million, compared to a profit of PLN 5 million in 2024. The increase in profit is due to the growth of the portfolio, but also to lower costs of legal risk of FX mortgage loans than last year.

Pekao Investment Banking

Pekao Investment Banking S.A. (pekaoib.pl)

Pekao Investment Banking S.A. (Pekao IB) provides highly specialized services for large and medium-sized enterprises and financial institutions. The scope of services provided by Pekao IB includes, in particular, brokerage services: receiving and transmitting orders to purchase or sell financial instruments, offering financial instruments, as well as advising companies on capital structure, enterprise strategy or other issues related to such structure or strategy, as well as advisory and other services in the field of mergers, divisions and acquisitions of enterprises.

In October 2025, Pekao IB took part in a project to create an innovative product within the Bank Pekao S.A. Group, i.e. PZU FIZ Private Debt. As part of the participation in this project, a subsidiary of Pekao IB was established: Pekao Inwestycje Dłużne sp. z o.o. ("PID"), 100% of whose shares were acquired by Pekao IB. PID holds PZU FIZ Private Debt investment certificates and intends to maintain them in the long term.

In 2025, Pekao IB acted as a joint bookrunner in six transactions on the WSE, and was also an intermediary in invitations to submit offers for the sale of shares in two companies listed on the WSE. He has provided bond issue services to five entities and has closed nine advisory transactions in obtaining financing (including ESG sustainability advisory) and four M&A projects. The Company has also implemented a number of projects on the capital market and in the field of debt advisory, which are expected to be finalized in subsequent periods.

In 2025, Pekao IB generated a consolidated net profit (from PID) of PLN 15 million, compared to a profit of PLN 3 million in 2024. The result was influenced by a higher number and value of completed transactions in the area of advisory services on the private and public capital markets compared to the previous year.

Pekao Faktoring

Pekao Faktoring Sp. z o.o.

Pekao Faktoring offers a full range of factoring services, including non-recourse and non-recourse factoring, as well as accompanying services, such as: obtaining information on the financial condition of debtors, debt collection, accounting for settlements and ongoing monitoring of payments. The offer is complemented by settlements of mass transactions, financial advisory, consulting in the field of business financing as well as loans and advances related to factoring agreements.

The Company, in cooperation with the Bank, is developing its offer for customers and new sales channels. As part of this cooperation, a factoring service is available for micro-entrepreneurs – the Bank's clients – based on a fully automated decision-making process.

The Company participates in the factoring limit repayment programme supported by BGK, using guarantees for financing non-recourse and reverse factoring granted under the BGK Crisis Guarantee Fund. In order to diversify its sources of financing, Pekao Faktoring issues bonds with a value of liabilities of PLN 4,737 million as at 31 December 2025.

Pekao Faktoring ranks 1st on the factoring services market, it is its leader with an 18.7% market share.

In 2025, Pekao Faktoring reported a net loss of PLN 54 million, compared to a loss of PLN 129 million in 2024. Losses in both periods were affected by high levels of credit risk costs.

tpay zaufane płatności

Szybkie przelewy i płatności online | Tpay

Bank Pekao S.A. owns 38.33% of shares in Krajowy Integrator Płatności S.A., the owner of the Tpay fast online payment system (formerly Transferuj.pl).

The company has the status of a domestic payment institution and is supervised by the Polish Financial Supervision Authority. The activity of KIP consists in intermediating in the transfer of payments between the payer and the recipient. 2025 was another year in which the Company increased the scale of its operations in the area of online and mobile payments. It continued to search for new areas for the development of services, acquired new customers and developed cooperation with existing ones, also as part of the strategic partnership with Bank Pekao S.A. As a result of the cooperation, the Bank's customers receive access to modern and secure payment services, while the Company's customers can take advantage of an attractive and comprehensive offer of banking services.

In 2025, KIP reported a net loss of PLN -12 million (PLN 6 million was included in the Group's result), compared to a profit of PLN 17 million in 2024. This year's loss is mainly due to the implementation of several large investment projects supporting the dynamic development of KIP and the costs resulting from the increase in the customer base.

7.3 Awards and distinctions

The activities of Bank Pekao S.A. gained wide recognition by clients, industry specialists, the market and the media, as evidenced by numerous awards and distinctions granted by Polish and foreign institutions. Measures aimed at providing customers with the highest quality products and services, innovation of the proposed solutions have been appreciated.

The most important awards and distinctions received in 2025:

AWARDS AND DISTINCTIONS RECEIVED BY BANK	
	The most resilient bank in Europe according to the EBA stress test The most resilient bank in Europe to negative macroeconomic scenarios, out of the 64 surveyed.
	Top Employer For creating an inspiring, friendly work environment and an attractive offer for candidates.
	Friendly Workplace 2025 For the culture of cooperation, courage and real impact of people on change, for creating a modern, responsible and friendly organization in which everyone has space to develop and co-create changes.
	Wellbeing Leader Certificate 2025 For implementing a comprehensive measure to support the health, balance and development of employees.
PARKIET	**Bank Pekao's Investor Relations among the best WIG30 companies** One of the best communicators of the WIG30 index according to institutional investors and analysts
	Złoty Laur Konsumenta 2025 Award in the highest quality category. The award confirms our commitment to providing the highest quality financial products and building trust among Polish consumers by maintaining customer service standards.
	Performance Marketing Diamonds EU 2025 Award in the category "The Most Effective Sales Campaign" for the most effective online sales campaign of the Konto Przekorzystne account in 2024.
Izba Domów Maklerskich	**Partner Spółka Giełdowa według Izby Domów Maklerskich** Award in the category of Partner Listed Company, 25th edition of the Capital Market Conference.
AWARDS AND DISTINCTIONS FOR RETAIL AND PRIVATE BANKING	
	The Best Bank in Poland in the Institution of the Year ranking The title of the Best Bank in Poland and distinctions in 8 categories. 1st place: Best Mobile App, Best Online Banking, Best Private Banking, Best Bank for Business, and Security. 2nd place: Best Branch Account Opening Process and Best Facility Service. Bronze medal for Best Personal Banking.
	Golden Banker 2025 for Mortgage Loan 1st place for a mortgage loan, 2nd place in the Personal Account and Child Account categories, third place in the Premium Account category and an award for communication in social media.
	The Best Private Bank in Poland 2025 For effectively combining financial knowledge with a deep understanding of the needs and aspirations of customers and offering them the highest level of service and individual solutions.
	Projekt ARCHIV3 **Best Digital Innovator of the Year in Central and Eastern Europe** oraz **Best Private Bank Use of Technology** The project was awarded for the innovative use of technologies such as blockchain, NFTs and technical photography in the preservation of works of art, for its unique contribution to digitization and safeguarding cultural heritage for future generations. The project was considered a pioneering solution that strengthens the role of banks in culture and sets new standards in the area of wealth management.
	Najlepsza Bankowość Prywatna 1st place in the Best Private Banking category in the 10th edition of the Institution of the Year survey.
Qorus Reinvention Awards Europe 2nd place in the "Distribution" category for the implementation of Omnibank CRM, the first analytical CRM system operating in the public cloud among Polish banks.	

Distinction for the "Funds with Bison" platform awarded by "Rzeczpospolita Cyfrowa"
Distinction for special contribution to the development of Polish digital transformation in 2024. For providing the first self-prepared platform in Poland dedicated to EU funds with a search engine for grants.

AWARDS AND DISTINCTIONS FOR CORPORATE BANKING

The Best Investment Bank in Poland for 2025

The Best Sub-Custodian Bank

The Best Bank for Sustainable Finance in Poland for 2025

Best Trade Finance Provider in Poland - for knowledge of local economic conditions, adaptation to customer needs and innovation of products and services.

Best Trade Finance Survey
1st place in the area of trade finance services and in the technology subcategory.

Best Foreign Exchange Bank 2025
For the highest quality of service, innovative solutions and experience in the implementation of the largest transactions.

Biuro Maklerskie Pekao among the most active participants of the capital market
Award in the category: the highest share of a local market maker in turnover on the Main Market in 2024, awarded as part of the Summary of the Stock Exchange Year 2024, organized by the Warsaw Stock Exchange.

PARKIET

Biuro Maklerskie Pekao the best in the ranking of „Parkietu"
The best and most effective brokerage house in the ranking of Investment Analysis Teams. First and second place for BM Pekao analysts in the general classification. A victory for employees in four industries: Banks & Finance, IT, Gaming, and Mining & Mining.

AWARDS AND DISTINCTIONS FOR CORPORATE BANKING

The Best Digital Solutions for SMEs in the CEE region 2025
1st place in the SME Banking Club ranking in the category of The Best Online Banking for SMEs for PekaoBiznes24 and The Best Digital SME Lending for an innovative, fully remote credit process that allows companies that have had a bank account for at least six months to obtain funds even in a dozen or so minutes, without the need to visit a branch.

AWARDS AND DISTINCTIONS RECEIVED BY SUBSIDIARIES

Byki i niedźwiedzie dla Pekao TFI
Statuette in the TFI of the year category awarded by Gazeta Giełdy i Inwestorów Parkiet. Golden Portfolios for two Pekao TFI funds for their performance in 2024.

7.4 Investing in human capital

People at the Center of HR Activities
The directions of the Bank's HR policy result from the mission and strategy of the organization and constitute the foundation of the activities undertaken in the area of HR.

We focus on strengthening the potential of employees by developing an organizational culture based on clearly defined values, improving leadership competencies and systematically improving skills that are key to the effective functioning of the organization.

Aspirational organizational culture
In the face of the challenges facing the banking sector and in line with the assumptions of the Bank's strategy for 2025-2027, we are building an organizational culture focused on development, dynamics of operations and aspirations to be an industry leader in key areas. Our goal is to create an organization that is ahead of the competition, thanks to a modern mindset, rapid decision-making, and the courage to implement change.

The foundation of our organizational culture is based on clearly defined values, redefined and communicated in conjunction with our strategy. **SIMPLY, TOGETHER, COURAGEOUSLY, RESPONSIBLY, WITH DETERMINATION, OPENLY and HONESTLY** - it is around these values that we build the expected attitudes, behaviours and work standards.

In the second half of 2025, we focused on activities supporting the internalization of the new catalogue of values, in particular through education and involving employees in various initiatives. Successive implementation of values in key organizational processes allows us to build a culture that is truly based on values and supports the implementation of our strategy.

Training and professional development
For years, we have been investing in the education and development of our employees, offering a wide range of opportunities to improve our competences, which support both the individual professional development of our employees and the development of key competences.

We provide access to various forms of education, tailored to the needs of employees and the specifics of positions. Educational activities focus on realization of in-class training programs, on-the-job learning, online training, coaching and Virtual Class system allowing for distance learning in form of Webinars.

In 2025, the main training priorities of the Bank were as follows:

- expanding the expertise of employees, with particular emphasis on the development of competences of the future, including in the area of artificial intelligence, AI and M365 adoption (including M365 Copilot),
- implementation of the LinkedIn Learning platform and launch of training courses for the Bank's employees,
- implementation of cybersecurity trainings,
- development of leadership competencies - education for managers,
- realization of mandatory training programs required under internal and external regulations.

In 2025, we completed over 279 thousand of training hours (class room and virtual sessions), in which attended by over 12,5 thousand of employees. Online courses and trainings were completed at level over 389 thousand hours, which confirms the effectiveness of development activities and the Bank's commitment to improving the quality of services and ensuring customer safety and well-being.

Expanding the specialist knowledge of the Bank's employees, including strong emphasis on the development of future competences
In 2025, the following training projects were implemented:

- M365 – we promoted the use of modern tools supporting everyday work and the use of AI, in particular as part of programs to transform the way we work,
- Copilot – we inspired employees to use artificial intelligence in practice in their daily work through training activities and encouraging them to share use cases,
- Innovation Laboratory, an initiative aimed at building a culture of innovation and supporting digital transformation at the Bank,
- Agility Forge – a program that enables employees to acquire specialist knowledge and skills in the field of agile methodologies (Agile path), process optimization (Lean path) and process management (process development path),
- ESG Academy – a training program carried out in cooperation with an external partner, including a basic scope for all employees and an extended scope for employees involved in ESG processes,

- Banking Sales School – a program implemented in cooperation with external partners, focused on the development of sales competences, including in the area of up-selling, acquiring new customers, conducting meetings and dealing with difficult situations,
- Individual training – over 950 people took advantage of specialist training provided by external educational companies.

Leadership development - education for managers
In 2025, we continued and developed training and development programs for managerial staff.

Key initiatives included:

- Leadership Academy and Retail Manager Academy – we piloted a new edition of the program for all managers in the Bank,
- Inspiring leadership – we conducted a pilot program for new managers in the Bank, the aim of which was to equalize the level of knowledge and familiarize themselves with the values and standards applicable in the Bank,
- Leadership Network – a series of online meetings, open to all managers at the Bank, with the participation of trainers and academic lecturers invited from the business world, enabling them to share their experience and inspire the development of leadership competences.

Implementation of the LinkedIn Learning platform
The Bank's employees gained access to the LinkedIn Learning platform. The platform offers training with more than 20 000 online courses in areas such as digital competences, management, leadership, communication, and cybersecurity. The platform has become a key tool to support a culture of continuous learning, with implementation including:

- creating a network of 37 LinkedIn Learning editors who promote valuable content, recommend development paths and support employees in using the platform,
- launch of the "Active with LinkedIn Learning" incentive program, which, through a system of badges and rankings, promotes educational activity and distinguishes the most engaged participants,
- implementation of communication campaigns and educational webinars that increase awareness of available development opportunities and encourage the use of the platform.

Cybersecurity training
We continue training our employees in the scope of Cybersecurity, the aim of which is to provide knowledge about conscious and safe use of the Internet, both at work and in private life.

AI & M365 Programs
In 2025, we began the phase of wider implementation of M365 tools, including Copilot. Employees of selected units, in particular those who work with a large number of documents, have been provided with an adoption and training program.

As part of the "Transforming the Way of Working" initiative, we have conducted training in the field of M365 tools and dedicated workshops on Copilot. Their aim was to improve the digital competences of employees and to disseminate the practical use of AI tools in everyday work. These activities contributed to organizing the way of working with tools and created the basis for increasing the efficiency of teams.

These activities are part of the process of building a modern and more automated work environment. The trainings were carried out in cooperation with external partners.

We also continued the M365 and AI Ambassador programs, which are an important part of building a digital culture in the organization. Thanks to the involvement of the Ambassadors, we strengthened the adoption process of new tools, creating a space for sharing experiences, good practices and mutual support during regular community meetings.

ESG Programs
The training program, which started in 2024, continued into 2025. The project was addressed to all groups of employees, from the management through representatives of the risk and business area.

All the Bank's employees took part in the ESG – Sustainable Development online training. Managers involved in ESG processes could take part in a training on "Corporate Governance (G)" dedicated to them.

ESG Employees and Ambassadors also participated in trainings covering the following issues:

- social issues (S),
- ESG and climate risk in the bank: new challenges and management strategies (E),
- elements of decarbonisation of the credit portfolio (E).

ESG Ambassador Program
The ESG Ambassador Program is addressed to employees interested in deepening their knowledge in the ESG area and actively supporting the Bank's activities in the field of sustainable development. Employees of the Headquarters and the Bank's Network participate in the programme. The main objective is to increase the level of employee engagement in the implementation of the sustainable development strategy and to build the ESG community and culture at the Bank. Ambassadors also take part in training as part of the ESG Academy program.

As part of the program, the Ambassadors use a dedicated channel on the MS Teams platform, which is a space for the exchange of knowledge and experience as well as mutual inspiration. Participants also receive substantive support, including press reviews, news, market trends, reports, key legislative changes and good practices in the field of ESG. An additional element of the Ambassadors' support are meetings in the "Coffee with ESG" series conducted by experts from the Bank.

We have also prepared a special offer for this group of employees, which was used by 25 people. The ambassadors took part in the online training "How to work with clients in sustainable ESG investments?", the aim of which was to prepare them for the EFPA ESG certification exam.

The Ambassadors also had the opportunity to participate in the Young Energy Europe program, under which a team of 4 people developed and presented during the final of the program a project on CO_2 reduction – "Intelligent Fleet Management at the Bank. Value Creation and Emission Reduction".

In addition, the websites of the ESG Academy and the ESG Ambassador Program are available on the bank's intranet, which support and disseminate ESG activities and initiatives.

Realization of mandatory training programs required under internal and external regulations
In 2025, we completed mandatory training, with particular emphasis on regulatory training in the areas of Bancassurance, MIFID 2 and the Mortgage Directive. Trainings related to regulatory areas accounted for 34% of all trainings provided, which confirms the Bank's consistent approach to improving employees' qualifications in accordance with the expectations of the regulator and applicable law.

We have also organized a series of trainings in the field of Occupational Health and Safety (OHS), first aid and recognizing the authenticity of cash signs, as well as other training programs resulting from external regulations.

Development programs and initiatives
In 2025, we carried out business trainings, development and integration workshops. We conducted employee potential surveys: Gallup tests, Insight Discovery survey, 360-degree Feedback survey. The development activities were complemented by coaching processes carried out for both employees and teams.

For the first time, we launched the **Talent DNA of the Team** development program, based on the CliftonStrenghts34 study. The program included 20 teams in which 302 tests were conducted. The program consisted of 6 team workshops and an individual development path for managers.

We continued the implementation of the second edition of the **Mission Development** programme, in which 39 people participated. The project path has been completed, which resulted in the presentation of 6 developed solutions to the Leadership Council. Some of the projects, by the decision of the Mentor and the Sponsor, have been qualified for implementation in whole or in a selected scope or for further development work. As part of the program, we carried out individual coaching based on the Insights Discovery tools, workshops using improvisation techniques, workshops on giving both individual and team feedback, and workshops based on the CliftonStrengths tool. The participants also took part in the Development Map development workshops, carried out with the use of group coaching. Currently, individual coaching sessions with participants are being conducted.

We launched the first edition of the "**Manager at the Start**" program, a development initiative supporting newly appointed managers in successfully entering the leadership role. The program combines the transfer of key operational knowledge with the development of managerial competences. The programme is based on two pillars. The first includes a series of short recorded webinars on processes, regulations, recruitment, and HR issues necessary to work in a managerial position. These materials make it easier to efficiently navigate formal and operational aspects. The second pillar is a series of workshops developing practical leadership competences. The workshop part opens with a joint online workshop, after which participants are directed to one of two paths.

- "From Expert to Leader" – intended for people taking up the position of manager for the first time.
- Leader in our organization – addressed to experienced managers who are just starting their work in the bank.

The program supports conscious building of the role of a leader and enables quick finding oneself in organizational realities. As part of the project, an intranet website with training materials (webinars) was prepared and a series of workshops was carried out.

In the **Sugar-Free Women's Programme**, we carried out development and educational activities resulting from the strategic objectives of the programme. The thematic offer of the programme was systematically supplemented and updated and included the development of professional, personal and parental competences carried out through trainings, workshops and webinars. The program also included development initiatives such as Conscious Leader or Excelentni, as well as activities supporting education and promotion of new technologies through webinars, technical trainings and programs such as "Closer to Technology", "emPower Women".

An important element of the programme were activities aimed at building pro-health awareness among employees. We carried out the Pink October campaign, in which 4 000 women participated, and the Blue November campaign, in which 2 200 participants took part.

We also continued the 2nd edition of the Development Program for Women Local Leaders, focusing on the development of leadership and project competences. At the end of the year, we launched the first edition of the mentoring program, under which 32 mentoring pairs started working together.

In total, more than 7 000 women took part in the activities carried out under the "No Sugar" Programme.

Managerial Shots is an online development program addressed to managerial staff. The program focuses on the development of soft skills in the field of management and leadership. It has been adapted to the needs of managers who cannot participate in long-term training. Each workshop lasts 45 minutes and provides specific, practical knowledge in a nutshell. In 2025, another 3 editions of the program were held, during which we carried out 36 workshops, attended by about 3,5 thousand managers. In the second half of the year, all workshops promoted and developed behaviours supporting the implementation of the Bank's values.

As part of the programme m.in the following topics were implemented:

- A leader close to people,
- Effective management of the work of virtual teams,
- Building authority based on trust and respect,
- How to support an employee when their tasks are not carried out.

Snacks for Employees are short workshops for employees carried out in an online formula. In 2025, we conducted 20 workshops. All workshops promoted and developed behaviours related to the bank's values. The topics covered included:

- Teamwork,
- Building mental resilience,
- Competences of the future.

Apprenticeship programs

We are consistently developing activities aimed at attracting graduates of the best universities in Poland and abroad, offering them the opportunity to build their professional path within the Bank's structures – both in the Headquarters and the Bank's Network.

As part of the next edition of the Banking Champions internship program, over 70 students and graduates from all over Poland joined the organization. The participants started working in selected units of the Bank, gaining practical knowledge about the functioning of modern banking. The programme provides practical experience in key areas of the Bank's operations, such as finance, risk, analytics, corporate banking, marketing, communication, HR and IT. The six-month internship formula enables the development of professional competences and real involvement in projects carried out by business teams.

Compensation policy

The compensation strategy was developed in line with the business standards and values underlying the Bank’s mission and reflected in the internal regulations as well as it constitutes the basis for enhancing and protecting the Bank's reputation and creating long term value for all the stakeholders. The key regulation in this area is the Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna, the last update of which was approved by the Supervisory Board of the Bank by resolution of December 16, 2022. This policy reflects the mission and values in the Bank's approach to remuneration systems, including:

- defines the compensation pillars, management of its structure, corporate and organizational processes,
- confirms the compliance requirements of the compensation systems with the generally binding law,
- defines the principles of market practice monitoring, and the approach to the matter of compensation systems which guarantees the sustainability of the Bank's functioning.

The remuneration structure ensures a direct link between remuneration and performance by guaranteeing financial stability and variable remuneration levels appropriate to the Bank's financial capacity, setting performance-based remuneration levels and developing incentive systems foreseeable the minimum levels of the Bank's performance below which the bonus is not paid. Variable remuneration covers all remuneration components, the granting of which depends on the results, and its payment is directly dependent on individual achievements and the results achieved by the Bank and adjusted to the risk.

Sustainable results contributing to the creation of long-term value for stakeholders relate to the actual results achieved and how they are achieved, with a view to measuring results consistent with shareholders' interests and profitability principles based on safe risk levels, sustainable risk management practices and a multi-dimensional performance analysis and quality of operation.

In order to ensure the competitiveness of the remuneration structures, as well as their transparency and an effective and fair remuneration system, the Bank monitors market trends in terms of forms of remuneration and the level of remuneration offered on the market. Decisions on the remuneration system at the Bank are made taking into account the available data on market trends in the area of fixed remuneration as well as incentive systems. Such data is obtained from consulting companies offering financial sector analyzes. In 2025, the Bank conducted analyses of wage coherence between women and men in identical positions, in order to compensate for the pay gap existing at the Bank.

The Bank also has a Remuneration Policy for Members of Supervisory Board of the Bank and the Management Board of Bank Polska Kasa Opieki Spółka Akcyjna, which sets out the framework principles and rules for determining, monitoring and controlling the remuneration rules and practices applied by the Bank in relation to the Members of its Supervisory Board and the Management Board of the Bank.

The Remuneration Policy for Members of the Supervisory Board of the Bank and the Management Board of Bank Polska Kasa Opieki Spółka Akcyjna supports proper and effective risk management and does not encourage taking excessive risks exceeding the acceptable general risk level approved by the Bank's Supervisory Board; implementation of the Bank's management strategy and risk management strategy; mechanisms for managing conflicts of interest occurring in the Bank's operations and limiting them; as well as ensuring that remuneration and any related terms and conditions of employment that affect remuneration, including those relating to conditions for granting and payment of remuneration, are gender neutral, i.e. they are not differentiated on the basis of gender.

As part of the remuneration system, employees are offered non-wage benefits ensuring fair treatment and consistency of the remuneration system.

Each year, a report on the functioning of the Remuneration Policy at the Bank is prepared, which is then presented at the General Meeting of Shareholders in order to assess whether the functioning of the Remuneration Policy in force at the Bank, supports the development and security of the Bank's operations.

Information regarding remuneration value of each Member of the Management Board is presented in the point 11, the section of the Management Board and the Supervisory Board Remuneration.

The Subsidiaries of the Bank's Capital Group have remuneration policies adapted to the size and specificity of their activities and the remuneration principles.

Incentive systems

In the Bank, there are three main incentive systems: an Executive Variable Compensation System, a System based on Management by Objectives (MBO), and a system based on provisions of Corporate Collective Labour Agreement, which is based on quarterly bonuses, bonus for retail sales forces and incentive reward.

The top management is covered by a variable remuneration system dedicated to people who have a significant impact on the Bank's risk profile. The aim of the System is to support the execution of the Bank’s operational strategy and to mitigate excessive risk conflicts of interest. Participant covered by the system may receive a variable compensation based on a bonus pool approach. The System provides a comprehensive performance measurement at individual level, level of his/her organizational unit and results of the entire Bank, as well as verification of the participant’s compliant behaviour with respect to law provisions, and standards adopted by the Bank and risk assessment. For reinforcement of care for long-term welfare of the Bank, under the system at least 50% of variable remuneration is provided in phantom shares based on the value of the Bank shares and at least 40% of the bonus is deferrable and paid after the end of the evaluation period it is payable for.

Annual goals set for the Bank's top management as part of the incentive system ensure consistency with the strategy of introducing sustainable development risks into the business in the investment decision-making process, and are consistent with the goals of the Bank's business strategy and risk strategy, including environmental, social and governance risks. (ESG risk), are consistent with the Bank's corporate culture and values, risk culture, including in relation to the long-term interests of the institution, as well as with the measures used to prevent conflicts of interest, and should not encourage excessive risk-taking.

The system of variable remuneration components is developed by People, Organization and CX Division, with the involvement and participation of other organizational units of the Bank, including Legal Department, Compliance Department, Risk Management Division, Financial Division, and in consultation with Internal Audit Department. This is to ensure compliance with the regulations, the Bank's articles of association and the standards of ethical conduct or other standards of conduct applicable to the Bank, in such a way that legal, compliance and reputational risks mostly related to customer relations are properly controlled and managed.

Variable remuneration systems implemented in the Bank's subsidiaries have schemes similar to the Bank for the division of remuneration into cash and financial instruments, taking into account general provisions and guidelines of market regulators regarding the sectors in which the subsidiaries operate.

MBO system covers employees employed under the management contract and refers in particular to the sales positions and to the managerial positions, which play a significant role in achieving the Bank's commercial goals. Under the MBO system, employees receive individual goals for realisation, which result from the financial plan adopted for a given year and the Bank's key goals. The amount of the annual bonus depends on the level of implementation of these goals, as well as the result achieved by the Bank. Sales functions employees, in each quarter, can receive an advance payment towards the annual bonus in achieving of the set goals.

In 2025, the Bank negotiated with trade unions to include in the Collective Bargaining Agreement employees employed under managerial contracts (employment contracts) covered by the "Remuneration Rules at Bank Polska Kasa Opieki Spółka Akcyjna Employees Employed under a Management Contract" (MBO system). The negotiations were conducted in good faith and respected the interests of the parties from January to June 2025. Due to the lack of agreement, the Bank decided to introduce three separate remuneration regulations for individual groups of employees covered by the MBO system so far, the assumptions of which are better suited to the specificity of the roles and functions performed by these employees. The remuneration regulations are in force from 2026.

The system based on the provisions of the Corporate Collective Labour Agreement (CCLA) applies to all employees who are covered by it. According to the provisions of CCLA the basis of the system is a quarterly bonus which is discretionary and depends on evaluation of employee's performance, the level of commitment and the results achieved by the Bank in a given year, as well as the incentive bonus, which is granted for outstanding achievements in professional work. As in previous years, in 2025, guidelines for variable remuneration, i.e. the bonus for sales network employees covered by the CCLA. According to the guidelines, the employee bonus was awarded based on the employee's individual sales results, taking into account the qualitative component. Determining the final amount of variable remuneration of employees covered by the Guidelines depended on the results of assessing the compliance of the employee with achieving goals or tasks.

Selections and Suitability Assessment Policy
The Bank has a Policy of selecting candidates for the position of a member of the Management Board and the key function as well as assessing the suitability of proposed and appointed members of the Management Board, Supervisory Board and persons holding key functions at Bank Polska Kasa Opieki Spółka Akcyjna (Selection and suitability assessment policy) approved by the Bank's Supervisory Board on 30 December 2020. The aim of the Policy is to guarantee an optimal and uniform process of selecting candidates for the position of a member of the Management Board and the Key Function at the Bank, so as to ensure that tasks related to the implementation of the Bank's plans and business strategy are performed by persons who have the necessary knowledge, experience and skills, and who enjoy get a good reputation.

The subsidiaries have implemented the Suitability Assessment Policies in accordance with applicable law.

Gender equality and Diversity policy
The Bank has a Gender equality and diversity policy with regard to members of the Supervisory Board, members of the Management Board and persons holding Key Functions at Bank Polska Kasa Opieki Spółka Akcyjna (Gender equality and diversity policy) introduced on December 18, 2020 by the Order of the President of the Management Board, which defines the strategy in the scope of managing diversity of the Bank's employees, including diversity with regard to the appointment of members of the Supervisory Board, members of the Management Board and persons performing Key Functions at the Bank. The gender equality and diversity policy define guidelines aimed at ensuring that the Bank's employees can manage their careers, achieve success and evaluate their work on the basis of individual achievements, regardless of gender.

The purpose of the Bank's diversity strategy referred to in the Gender Equality and Diversity Policy is to ensure high-quality performance of tasks by the Bank's employees, including the selection of competent persons to perform functions in the Supervisory Board, Management Board and Key Functions at the Bank, first of all applying objective substantive criteria and taking into account the benefits of diversity.

The gender equality and diversity policy, in accordance with the legislative process in force at the Bank, was adopted by the Bank's Management Board and approved by the Supervisory Board and in relation to Members of the Supervisory Board, by the General Meeting of Shareholders.

Gender equality enables the Bank's employees to manage their career, achieve success and evaluate their work on the basis of individual achievements, regardless of gender.

Relations with Trade Union Organizations

The Bank's cooperation with trade union organisations in the area of negotiations and consultations was conducted in accordance with the procedures and principles set out in labour law, respecting the interests of the parties and the principles of social dialogue. In 2025, 35 meetings were held (including 20 two-day meetings).

The meetings focused primarily on negotiations and arrangements resulting from internal labour law and generally applicable regulations, changes in internal labour law, arrangements for the use of the company social benefits fund and other topics related to collective employee rights.

The following agreements were signed in the scope of negotiations referred to in internal labour law and generally applicable regulations:

1) Agreement of 19 March 2025 on the adoption of the expenditure plan of the Company Social Benefits Fund for 2025,
2) Agreement of 3 April 2025 on measures concerning the terms and conditions of employment of employees taken over by Pekao Direct Sp. z o.o.,
3) Agreement of 16 April 2025 on the rules for the distribution of the incentive fund referred to in § 19 of the Company Collective Labour Agreement for 2024,
4) Agreement of 22 May 2025 on the amount of funds for the reclassification of employees of Bank Polska Kasa Opieki SA covered by the Collective Bargaining Agreement in 2025.

In 2025, the Bank conducted negotiations with trade unions regarding the inclusion in the Company Collective Labour Agreement of employees hired on the basis of management contracts (employment contracts) covered by the “Remuneration Rules at Bank Polska Kasa Opieki Spółka Akcyjna for Employees Employed on the Basis of a Management Contract” and at the same time not covered by the ‘Rules of the Variable Remuneration System for Management Staff - Participants who are not Members of the Management Board / Supervisory Board’. The negotiations were conducted in good faith, respecting the interests of the parties, from January to June 2025. Due to the lack of agreement, the Bank, after consultations with trade unions pursuant to Article 30(6)(1) of the Act of 23 May 1991 on trade unions, decided to introduce remuneration regulations for individual groups of employees covered by the bonus system based on the Management by Objectives (MbO) system, settled on a quarterly basis, annually in advance and settled quarterly and annually. In order to implement changes to the remuneration and bonus rules for this group of employees, the Bank first presented all employees with proposals to change the remuneration conditions by mutual agreement. The agreements were signed by 95% of employees. Due to the fact that 5% of employees did not agree to the changes by mutual agreement, the Bank applied the collective redundancy procedure in accordance with the procedure and rules set out in the Act of 13 March 2003 on special rules for terminating employment relationships with employees for reasons not related to the employees. The agreement on collective redundancy was concluded with three trade unions.

Additionally, with a view to continuously improving employee motivation, particularly among employees responsible for customer service, in 2025 the Bank, together with four trade unions, parties to the Company Collective Bargaining Agreement, agreed and signed on 19 November 2025, in the form of Additional Protocol No. 5 to the Collective Bargaining Agreement, a “Quantitative and qualitative bonus system for retail sales employees and Contact Centre sales employees”, constituting Appendix 4D to the Collective Bargaining Agreement. The Additional Protocol was registered by the Regional Labour Inspectorate in Warsaw. The bonus system for retail sales staff addresses business needs, introduces transparent criteria for acquiring bonuses, and supports employee motivation and commitment.

In 2025, there were four collective disputes at the Bank, initiated in 2016, 2019, 2021 and 2024 by one of the trade unions. As part of the collective dispute initiated in 2016, a protocol of disagreement was signed on 13 April 2022, ending the mediation stage.

Trade unions are able to post their newsletters and information on important employee matters, including dialogue with the employer, on the Bank's intranet pages. In its relations with trade unions, the Bank has been guided by the principle of good faith in developing the best solutions in the field of collective labour law for both employees and the Bank.

Workforce in number

At the end of December 2025, employment in the Group amounted to 14,839 full-time positions (in the Bank and the companies consolidated under full consolidation method) compared to 15,101 full-time positions at the end of 2024.

At the end of December 2025, the Bank's employment amounted to 13,707 full-time positions compared to 12,602 full-time positions at the end of 2024.

The average age of the employees was 44,9 years, 76.7% of the employees are university graduates (78.6% in 2024), women represent 65.8% of the total workforce.

7.5 Sponsorship and charity policy

Our sponsorship and charity activities are aimed at strengthening the Bank's image as an open, modern institution close to customers and local communities. We support nationwide projects by sponsoring strategic events important for Polish culture, as well as initiatives addressed to local communities. These activities strengthen the Bank's reputation as a leader of the Polish financial sector, with a well-established tradition and experience.

We do not donate to or sponsor political parties. We also do not fund events or initiatives that could be considered politically active or in support of any political party.

We consistently work to improve the quality of life of the society and build long-term relationships based on mutual understanding of needs. Our social activity focuses on long-term initiatives, carried out in cooperation with selected organizations and institutions that carry out projects in the following areas:

- responsible economic development,
- promotion of the national brand and Polish values,
- support for culture, education and sport,
- help children in need of support,
- environmental protection, with particular emphasis on the protection of bison.

Bank Pekao S.A. Foundation
Our charitable activities are carried out through the Bank Pekao S.A. Foundation, established in 1997 and under our substantive supervision. The scope of the Foundation's activities includes a wide range of social and charitable activities.

In 2025, the Foundation awarded 11 targeted donations. The supported projects were in line with the statutory objectives of the Foundation and concerned primarily educational activities, with particular emphasis on financial, economic and historical education. The beneficiaries of the Foundation were also organizations conducting charitable activities, projects in the field of health protection and promotion, as well as initiatives supporting the development of physical culture and sport.

We have been involved in numerous projects implemented throughout the country, which enabled the continuation of long-term initiatives and provided significant support for local communities. An important area of the Foundation's activity is also the promotion and organization of employee volunteering.

Employee volunteering
In 2025, we organized the 11th edition of the "Jesteśmy blisko" grant competition. During the ten editions of the competition, we have completed nearly 600 projects for the benefit of local communities throughout Poland. As part of the eleventh edition, volunteer leaders and their teams carried out 50 projects in 41 towns. Each of the projects received a grant of PLN 10,000 gross, awarded by the Bank Pekao S.A. Foundation.

The beneficiaries of volunteering activities were, m.in, children and adolescents, wards of care and educational institutions, patients of medical facilities, participants of workshops and thematic classes, members of sports clubs and music centers, as well as animals staying in shelters.

Our management is also actively involved in volunteering initiatives. Information on key projects is presented in summaries and reports available on the Bank's website.

For many years, our employees have also participated in voluntary blood donation campaigns, first aid workshops and educational initiatives related to environmental protection, including ecological workshops conducted in the municipal bank apiary.

Protecting the environment and biodiversity
For years, we have been involved in protecting Polish bison and supporting efforts to preserve the world's largest free-living herd, which inhabits the Białowieża Forest. We support scientific and educational projects carried out, among others, by Białowieski Park Narodowy, the Fundacja Rozwoju Warszawskiego Ogrodu Zoologicznego “Panda”, the Agencja Rozwoju i Promocji Ziemi Pszczyńskiej, and the Stowarzyszenie Miłośników Żubrów.

Sport, economy and education

We continued our cooperation with the Polski Związek Koszykówki and the Polska Liga Koszykówki S.A., supporting the Polish National Basketball Team as well as youth competitions. The Bank's logo remained present on the national team players' game jerseys.

As one of the leaders of the financial sector in Poland, we were present at key economic and economic initiatives in Poland and abroad, including m.in the Impact'25 conference, the European Economic Congress and the Corporate and Investment Banking Congress. We co-created the 16th EFPA Congress and acted as a partner of numerous industry, economic and security conferences.

As part of our cooperation with universities, we supported the celebration of the 100th anniversary of the Uniwersytet Ekonomiczny w Krakowie, the Juwenalia Studenckie Szczecin 2025, and initiatives carried out by the Samorząd Studentów Uniwersytetu Rzeszowskiego.

Culture and national heritage

In 2025, we continued our efforts to support Polish cultural heritage and promote art. We cooperated, m.in, with the Zamek Królewski w Warszawie, sponsored the Unikalny Festiwal Offowy and the Bittersweet Festival, and promoted the Virtual Art Gallery of Bank Pekao.

During the Noc Muzeów 2025, we presented works from the Bank's collection at the Zamek Królewski w Warszawie, the Muzeum Narodowe w Poznaniu, and the Muzeum Narodowe w Krakowie. We also organized the outdoor exhibition "Legendy polskie" featuring illustrations by Józef Wilkoń at the Galeria Plenerowa Łazienek Królewskich, prepared on the occasion of the artist's 95th birthday.

Social support and health

We supported the Stowarzyszenie SOS Wioski Dziecięce w Polsce and joined a campaign dedicated to neurodiversity. As part of the project, therapeutic rooms were created and equipped in the new Centrum Specjalistyczne SOS w Karlinie. We also sponsored the conference "System Ochrony Zdrowia w czasie wojny", implemented as part of activities promoting health education.

7.6 Major sources of risk and threats

Effective risk management is a prerequisite for maintaining a high level of security of the funds entrusted to the Group, and for achieving a sustainable and balanced profit growth within the Group's risk appetite.

Key risks material for the Group include:

- credit risk – the risk deriving from an unexpected change of the counterparty creditworthiness that might generate a change in the value of the counterparty's credit exposure,
- market risk – the risk of incurring losses on balance and off-balance sheet items due to changes in market prices; market risk includes interest rate risk and credit spread risk in the banking book, to which the financial result or economic value of the Bank's equity is exposed due to interest rate changes or credit spread changes,
- operational risk – the risk of loss resulting from inadequate or unreliable internal processes, human resources and systems or from external events,
- liquidity risk – the risk that the Bank may be unable to meet its payment obligations (by cash or delivery), whether expected or unexpected, without jeopardizing its day-to-day operations or its financial condition,
- excessive leverage risk – the risk of excessive increase in credit exposures in relation to the Bank's own funds (Tier 1),
- compliance risk – the risk of legal or regulatory sanctions, financial losses or reputation damage to which the Bank is exposed as a result of non-compliance with the law, regulators' recommendations or standards of conduct adopted by the Bank and applicable to its activities,
- reputation risk – current or prospective risk to earnings and capital arising from adverse perception of the image of the financial institution on the part of customers, counterparties, shareholders, investors, regulators,
- business risk – the risk of adverse, unexpected changes in business volume or margins that are not caused by credit, market or operational risks. An element of business risk is the risk of changes in macroeconomic conditions defined as the risk of changes in the macroeconomic environment that may affect future capital requirements or the level of available financial resources, and strategic risk, i.e. the risk of incurring losses due to the lack or faulty implementation of the adopted strategy or lack of responsiveness to changes in the business environment, e.g. a change of the trend in the economic cycle,
- model risk – the risk of loss resulting from decisions that are essentially based on the output of models, due to errors in the design, development, parameter estimation, implementation, use or monitoring of such models,
- bancassurance risk – the risk resulting from the activity of offering insurance products,
- ESG risk (Environmental, Social, Governance) – the risk of any negative financial impact on the Bank arising from current or prospective impacts of environmental, social or governance factors on the Bank's counterparties or assets invested by the Bank,
- ICT risk (Information and Communication Technology Risk) – the risk of loss related to reasonably identifiable circumstances in relation to the use of network and information systems which, if materialized, could jeopardize the security of the network and information systems, any technology-dependent tools or processes, operations and processes, or the provision of services, by producing adverse effects in the digital or physical environment.

For all risks deemed material, the Bank has in place a risk management process that includes the following stages: identification of threats as part of operational risk management, risk measurement or estimation and assessment, determination of economic capital, control, including risk mitigation, monitoring and reporting.

The Group has adopted a comprehensive and consolidated approach to risk management. It extends to all units of the Bank and subsidiaries. The risks are monitored and managed taking into account business profitability and the capital required to cover the losses resulting from these risks.

The risk management system, ensuing directly from the adopted risk management strategy, is based on the concept of shared responsibility and organised on three independent levels:

- First level, which covers risk management in the Bank's operational activities,
- Second level, which comprises risk management by employees employed in positions or organizational units related to risk management and independent activities of the Compliance Department,
- Third level, which is the activity of the Internal Audit Department, regularly and independently assessing the risk management system and internal control system.

The Management Board of the Bank is responsible for achieving the strategic risk management goals. The Management Board designs, implements and ensures the operation of the risk management system which covers all material risks. The Management Board develops the risk management strategy and defines the Group's risk appetite. The Supervisory Board of the Bank, supported by the Risk Committee and Audit Committee, oversees whether the Group's policies of taking various risks is compliant with the overall strategy and financial plan. The Supervisory Board of the Bank approves the risk management strategy and risk appetite of the Group and evaluates the adequacy and efficiency of the risk management system. The Credit Committee and Credit Risk Committee (supported by the Retail Client Risk Committee and Corporate Client Risk Committee) play an important role in the credit risk management, the Asset, Liability and Risk Committee and Liquidity and Market Risk Committee in market and liquidity risk management, the Operational Risk Committee and Bank Security Committee in the management of the operational risk and the Model Risk Committee in model risk management.

The rules of managing each of the risks are defined in the guidelines set up by the credit risk strategy and policy, financial risk and investment activity strategy and investment and market risk policy and the operational risk management strategy and policy approved annually by the Management Board (policies) and by the Supervisory Board of the Bank (strategies) as well as in internal procedures.

Detailed reports on credit, liquidity, market, operational and model risks are presented to the Management Board and the Supervisory Board of the Bank on a regular basis.

The rules and instruments of managing each of the risks and information on the risk exposure are included in Note 45 to the Consolidated Financial Statements of Bank Pekao S.A. for the period ended on 31 December, 2025 and in the document "Information in respect to capital adequacy of Bank Pekao S.A Group as at 31 December 2025" published on the Bank's website.

Operational risk

The objective of proper operational risk management is to maintain the operational risk the Group takes, on the level consistent with a specific risk appetite. Operational risk management is based on internal procedures that are consistent with the law requirements, resolutions, recommendations and guidelines of the supervisor and includes: identification, assessment, monitoring, preventing and reporting of operational risk.

The operational risk profile is determined mainly by two operational event categories, in which the highest exposure to operational risk is identified i.e. Clients, products and business practices and External frauds. This is reflected in the table below, which presents the distribution of losses resulting from operational events by categories as defined by the Article 324 of Regulation (EU) No 575/2013 of the European Parliament and of the Council.

The Group executes mitigation actions for all of the operational event categories, with particular emphasis on categories of the highest relevance.

OPERATIONAL EVENTS BY CATEGORIES	2025	2024
Internal frauds	0.00%	0.00%
External frauds	4.25%	3.22%
Employment practices and workplace safety	0.14%	0.14%
Clients, products and business practices	91.82%	95.65%
Damages to physical assets	0.15%	0.23%
Business disruption and system failures	0.03%	0.63%
Execution, delivery and process management	3.61%	0.13%
Total	**100.00%**	**100.00%**

Bank executes mitigation actions for all of the operational event categories, with particular emphasis on categories of the highest relevance.

OPERATIONAL EVENTS BY CATEGORIES	2025	2024
Internal frauds	0.00%	0.00%
External frauds	4.37%	3.64%
Employment practices and workplace safety	0.14%	0.15%
Clients, products and business practices	91.67%	95.21%
Damages to physical assets	0.15%	0.26%
Business disruption and system failures	0.03%	0.71%
Execution, delivery and process management	3.64%	0.03%
Total	**100.00%**	**100.00%**

Credit risk

Managing credit risk and maintaining it at a safe level is vital for the Bank's financial performance. In order to minimize credit risk, special procedures have been established, pertaining in particular to the rules of assessing obligor and transaction risk, collateralization of loan and lease receivables, credit decision powers and concentration risk management.

Prudent credit risk management at Bank Pekao S.A. is based on the Credit Risk Strategy and Credit Risk Policy, which take into account, among the others, measures reducing the potential threats coming from macroeconomic factors related to the armed conflict in Ukraine and the related disturbances in the supply of raw materials and their impact on the quality of the loan portfolio. The same approach is applied in the Bank's subsidiaries.

Lending activities are subject to limits following both from the external regulations (CRR) and the Bank's internal standards, including limits concerning exposure concentration ratios for individual sectors of the economy, limit on the share of large exposures in the Bank's loan portfolio, portfolio limits and limits of exposures to countries, foreign banks and domestic financial institutions.

The credit decision powers, lending restrictions as well as internal and external prudential standards, pertain to loans and guarantees as well as derivative transactions and debt instruments. The quality of the loan portfolio is also protected by periodic reviews and ongoing monitoring of the timely servicing of loans and the financial standing of customers.

The Bank has continued to work on further rationalization of the credit process with an aim to obtaining better efficiency and security, including in particular enhancement of the procedures and tools for risk measurement and monitoring.

Credit risk concentration limits

According to the applicable regulations the total exposure of the Bank to the risks associated with a client or a group of connected clients may not exceed 25% of a bank's Tier 1 capital. In 2025, the limits of large exposures were not exceeded.

Sector concentration

In order to mitigate credit risk associated with excessive sector concentration the Bank sets up a system for shaping the sectoral structure of credit exposure. Every year within Credit Risk Policy the Bank defines sector limits for particular sectors of economy. These limits are subject to ongoing monitoring. The system applies to credit exposure in particular types of business activity according to the classification based on the Polish Classification of Economic Activities (Polska Klasyfikacja Działalności – PKD).Concentration limits are set based on the Bank's current credit exposure and risk assessment of each sector. Periodic monitoring of the Bank's exposure allows for ongoing identification of the sectors in which the concentration of exposure may be too excessive. In such cases, an analysis of the economic situation of the sector is performed including both the current and forecast trends and an assessment of quality of the current exposure to that sector. These measures enable the Bank to formulate the activities to reduce sector concentration risk and ongoing adaptation of the Bank's Credit Risk Policy to a changing environment.

The Group's risk management process

The Bank supervises the risk related with subsidiaries. In particular an assessment on size and profile of risk related with their activities is performed. Risk management processes are consistent throughout the Group and adapted to the complexity of the risk profile of individual entities, in accordance with the principle of proportionality.

Compliance risk

Compliance risk is the risk resulting from breaching laws, internal regulations and market standards in the processes functioning within the Bank. Compliance risk can lead to criminal or administrative sanctions, material financial losses, diminished reputation, reduced brand value, reduced development potential and inability to perform contracts, as well as limitation or loss of the ability to conduct business activities.

There is a separate unit for compliance matters functioning within the Bank, the Compliance Department, organisationally and operationally independent and subordinated directly to the President of the Management Board. Compliance Department is the key element of ensuring compliance within the Bank.

The Bank ensures compliance through application of suitable control mechanisms and compliance risk management process coordinated by the Compliance Department. Within the control function, the Compliance Department designs and supervises the implementation of control mechanisms with the aim to ensure compliance with law, internal regulations and market standards. The Compliance Department autonomously applies some of such control mechanism and performs independent monitoring of their compliance by other organizational units of the Bank, as well as reports the results of this monitoring. The compliance risk management process includes the following stages: identification, assessment, control, monitoring and reporting of the compliance risk level.

Within the control function, the Compliance Department ensures compliance, in particular through:

- current vertical verification on a continuous basis within risk-based approach on selected processes operating at the Bank (ex-ante activities),
- vertical testing, including monitoring of adherence to selected on risk-based approach control mechanisms, performed in the case of completed activities within selected processes functioning at the Bank (ex-post activities),

within the scope specified in the Regulations of functioning of the Compliance Department at Bank Pekao S.A.

As part of compliance with laws, internal regulations and market standards each employee of the Bank is obliged to apply appropriate control mechanisms and to perform independent monitoring of adherence to control mechanisms, within the scope of duties assigned to him/her.

The assumptions of the compliance risk management process were defined in developed by the Management Board and approved by the Supervisory Board, the Compliance Policy of Bank Pekao S.A. and Regulations of functioning of the Compliance Department at Bank Pekao S.A. There are following key elements supporting compliance risk management process:

- supervision of the Supervisory Board and responsibility of the Management Board for the effective management of compliance risk and observance of the Compliance Policy of Bank Pekao S.A.,
- responsibility of the Bank's employees for ensuring compliance within the scope of their duties,
- properly defined organizational structure, including appropriate location of the Compliance Department,
- internal regulations on compliance matters,
- training,
- constant cooperation between the Compliance Department, and the Internal Audit Department and other internal control system units.

The reports on performance of tasks by Compliance Department together with the level of assessed compliance risk are presented to the Management Board and Supervisory Board. The oversight of compliance risk related to the activities of subsidiaries is performed in the Bank.

Implementation and application of the compliance risk management standards are key factors in creating the enterprise value, reinforcing and protecting the Bank's reputation, and winning public trust in the Bank's activities and its standing.

7.7 Capital adequacy

Bank Pekao S.A. Group and Bank Pekao S.A.

Capital ratios are the basic measure applied for the measurement of capital adequacy according to Regulation of the European Parliament and of the Council (EU) No 575/2013 of June 26, 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012, which entered into force since January 1, 2014 together with further amendments, as well as Commission Implementing Regulations or Delegated Regulations (EU) (CRR Regulation).

Capital ratios, capital requirements and own funds have been calculated in accordance with the above mentioned CRR Regulation using national options defined in article 171a of The Banking Act, Act of 5 August 2015 on macro-prudential supervision over financial system and crisis management in financial system (Act on macro-prudential supervision), as well as regulations of minister in charge of the finance institutions.

According to law, Bank Pekao S.A. Group and Bank Pekao S.A. are required to maintain minimal values of capital ratios resulting from Pillar I level (CRR Regulation), capital requirement of Pillar II resulting from The Banking Act and combined buffer requirement resulting from Act on macro-prudential supervision.

Minimal value of capital ratios on Pillar I level are:

- Total capital ratio (TCR) in amount of 8%,
- Tier I capital ratio (T1) in amount of 6%,
- Common Equity Tier I capital ratio (CET 1) in amount of 4.5%.

Combined buffer requirement as at 31 December 2025 consists of:

- Capital conservation buffer in amount of 2.50%,
- Countercyclical capital buffer in amount of 1.00%[1] for Bank Pekao S.A. and Bank Pekao S.A. Group,
- Other systemically important institution buffer in amount of 1.00%,
- Systemic risk buffer in amount of 0.00%[2].

On Pillar II, Bank Pekao S.A. and Bank Pekao S.A. Group have no additional capital requirement (P2R).

Together, Bank Pekao S.A. and Bank Pekao S.A. Group are obliged to maintain:

- Total capital ratio (TCR) in amount of 12.50%,
- Capital ratio Tier I (T1) in amount of 10.50%,
- Common Equity Tier (CET 1) in amount of 9.00%.

The capital ratios of Bank Pekao S.A. Group and Bank Pekao S.A. were significantly above the minimum required by the law.

[1] Countercyclical capital buffer was calculated as of December 31, 2025 at the level 0,9960% for Bank Pekao S.A. and 0, 9963% for Bank Pekao S.A. Group, due to the fact that on 18 September 2024, the Minister of Finance issued a regulation according to which countercyclical capital buffer ratio is equal to 1% of the total risk exposure amount for credit exposures in the territory of the Republic of Poland.

[2] According to the Regulation of the Minister of Finance, the systemic risk buffer was abolished on March 19, 2020. The buffer value applicable until that date was 3% of the total risk exposure amount for all exposures located only in the territory of the Republic of Poland.

Bank Pekao S.A. Group

As of December 31, 2025 Bank Pekao S.A. Group total capital ratio amounted to 16.4% and common equity Tier I ratio amounted to 15.0%.

The table below presents the basic information concerning Bank Pekao S.A. Group capital adequacy as of 31 December, 2025 and 31 December, 2024.

CAPITAL REQUIREMENT (PLN mln)	31.12.2025	31.12.2024*
Credit Risk	12,088	11,064
Market Risk	105	93
Counterparty credit risk including CVA	224	150
Operational risk	1,753	2,049
Total capital requirement	**14,170**	**13,356**
OWN FUNDS (PLN mln)		
Common Equity Tier I Capital	26,642	25,889
Tier II Capital	2,464	2,074
Own funds for total capital ratio	**29,106**	**27,963**
Common Equity Tier I Capital ratio (%)	**15.0%**	**15.5%**
Total capital ratio TCR (%)	**16.4%**	**16.8%**

(*) Data for December 31, 2024 have been recalculated taking into account the retrospective recognition of part of the profit for 2024 (after confirmation of the financial results by the General Shareholders Meeting), in accordance with the EBA position expressed in Q&A 2018_3822 and Q&A 2018_4085.

Common equity Tier I Capital Ratio of Pekao S.A. Group as at the end of December 2025 was lower by 0.5 p.p. compared to the end of December 2024, mainly due to the increase of total capital requirement by 6.1% despite higher Common Equity Tier I Capital by 4.1%. Total Capital Ratio of Bank Pekao S.A. Group as at the end of December 2025 was lower by 0.4 p.p. compared to the end of December 2024.

Increase of Tier II Capital at the end of December 2025 compared to the end of December 2024 results from issuance of subordinated bonds E series in the amount of 750 mln, partially compensated by amortization of subordinated bonds A series and B series (during final 5 years of maturity of the instrument).

Bank Pekao S.A.

As of December 31, 2025 Bank Pekao S.A. total capital ratio amounted to 18.7% and common equity Tier I ratio amounted to 17.2%.

The table below presents the basic information concerning Bank Pekao S.A. capital adequacy as of 31 December, 2025 and 31 December, 2024.

CAPITAL REQUIREMENT (PLN mln)	31.12.2025	31.12.2024*
Credit Risk	10,594	9,611
Market Risk	99	93
Counterparty credit risk including CVA	224	150
Operational risk	1,667	1,887
Total capital requirement	**12,584**	**11,741**
OWN FUNDS (PLN mln)		
Common Equity Tier I Capital	27,000	26,295
Tier II Capital	2,464	2,074
Own funds for total capital ratio	**29,464**	**28,369**
Common Equity Tier I Capital ratio (%)	**17.2%**	**17.9%**
Total capital ratio TCR (%)	**18.7%**	**19.3%**

(*) Data for December 31, 2024 have been recalculated taking into account the retrospective recognition of part of the profit for 2024 (after confirmation of the financial results by the General Shareholders Meeting), in accordance with the EBA position expressed in Q&A 2018_3822 and Q&A 2018_4085.

Common equity Tier I Capital Ratio of Pekao S.A. as at the end of December 2025 was lower by 0.7 p.p. compared to the end of December 2024, mainly due to the increase of total capital requirement by 7.2% despite higher Common Equity Tier I Capital by 3.9%. Total Capital Ratio of Bank Pekao S.A. as at the end of December 2025 was lower by 0.6 p.p. compared to the end of December 2024.

8. Prospects for Development

8.1 Strategic directions and business priorities

In April 2025, the Management Board of Bank Pekao S.A. adopted, and the Supervisory Board approved, **the Bank's strategy "… the only way is up!" for the years 2025–2027.** Drawing on emerging trends and opportunities, and capitalising on the bank's core strengths, our principal aim is to strengthen our market position and sustain the high value delivered to shareholders. All initiatives are aligned with the Bank's mission, vision, and values.

Mission: With You Throughout Life
We support our clients at every stage of their life journey – from their first account to milestone decisions, from local business ventures to international success. Through the commitment of our employees and intelligent technologies, we unite a century of Pekao's tradition with a dynamic outlook toward the future.

Vision: First Choice – Today and Tomorrow
To be a universal, benchmark Bank in Poland – a leader in intelligent financial technologies, supporting clients throughout their personal and professional journeys. We are building a workplace where employee passion and development translate into outstanding client experiences.

Values: Simply, Together, Courageously, Responsibly, With Determination, Openly, Honestly

Our ambition for 2027 is to rank among the most profitable and efficient institutions in the Polish banking sector. Our **"… the only way is up!"** strategy is built on three pillars: **Growth, Accessibility, and Efficiency**. Within these pillars, we have defined nine strategic directions. Within these pillars, we address our strategic adaptation to identified market trends – developments we aim to actively leverage in our day-to-day operations. These include increasing environmental volatility, demographic challenges, a shift towards understanding and fulfilling client expectations, rapid technological advancement, and emerging investment and economic transformation opportunities.

Growth Pillar – We will focus on expanding key client segments and product lines to improve financial results and grow market share. Strategic directions under this pillar include:

1. Supporting client activity with sensitivity to lifecycle changes;
2. Leveraging our partnership with PZU Group to build a leadership position in the bancassurance market;
3. Integrating Pekao Group Products (Leasing, Factoring) with client Relationship Management – particularly for SMEs and microenterprises.
4. Expanding corporate and enterprise banking by capitalising on economic momentum and the Bank's sector-specific expertise.

Accessibility Pillar – We will make banking services more modern, convenient, and tailored to client lifestyles. Strategic directions in this pillar include:

5. Integrated client service model with high-quality conversational banking and an optimised branch format
6. A client-centric approach with service quality at the forefront, to ensure interacting with the Bank becomes a positive and seamless experience.

Efficiency Pillar – We will enhance operational efficiency through fast, modern processes and an aspirational organisational culture. Strategic directions in this pillar include:

7. Developing an effective data ecosystem, including integrated and efficient management and financial reporting;
8. Enhancing the ergonomics of key processes based on continuous improvement
9. Aspirational organisational culture driven by dynamic attitudes, decisiveness, and a willingness to embrace new solutions.

Within each pillar, we have highlighted the goals we want to achieve in the 2027 horizon:

PILLAR	GROWTH	ACCESSIBILITY	EFFICIENCY
2027	• 1.4 million young clients under 26 • +700,000 active clients • PLN 1 billion in gross written premium (GWP) • x5 increase in GWP for standalone products • TOP3 in leasing & factoring • x2 increase in the number of new leasing and factoring clients • Leader in corporate banking • Leader in public sector banking	• 4.4 million active mobile clients • x3 increase in client interactions via voice channels • 72% share of remote sales • TOP3 NPS in mass segments	• Implementation of the data ecosystem foundations and launch of the Data Driven model • 30% share of remote channels in business loan sales • 70% digitalisation rate for SME, MID and Corporate segments • x3.5 increase in the number of systems in the cloud • 10% increase in work efficiency • >2x increase in AI solutions implemented in the Bank • 80% of employees using AI

Strategy Implementation in 2025
In 2025, we initiated the implementation of our new strategy. To operationalise it, the ambitions outlined in the document were cascaded across the Bank's business areas and translated into a list of several strategic initiatives

Key Strategic Goals:
We concluded 2025 having achieved our key strategic goals in line with the trajectory set out in the strategy:

STRATEGIC GOAL	2025 PERFORMANCE	2024 PERFORMANCE	2027 TARGET
ROE (%)	21.4%	21.2%	>18
C/I (% incl. BFG charges)	34.5%	34.2%	<35
CoR (bps)	0.39	0.48	65-75
Dividend payout ratio (%)	n/a	75	50-75

As of the date of publication of the Report, the dividend payout ratio has not yet been approved. Nevertheless, the Bank maintains a strong capital position, which supports the dividend policy. This is reflected in the level of Tier 1 ratios of 15.0% and the total capital ratio of 16.4%.

Growth Pillar
In 2025, we consistently pursued initiatives aimed at strengthening our position in the most profitable segments, such as consumer finance, microenterprises, SMEs and mid-sized companies. Drawing on Pekao's well-established corporate banking expertise, we supported our clients' development and engaged in major transformation projects.

In 2025, we opened a total of 497.5 thousand retail client accounts, maintaining a high acquisition rate. 35% of these were new current accounts for clients under the age of 26. By the end of 2025, the Bank served 6.7 million retail clients, including 1.2 million young clients.

Our sales performance was significantly supported by the "Supermoce w podróży" campaign and a comprehensive suite of solutions designed to meet clients' travel needs during the holiday season. Innovative payment rings and the ability to purchase e-vignettes via the PeoPay app proved particularly popular. In cooperation with LOT Polish Airlines and the Miles & More programme, we continued to promote mileage accumulation for transactions made using the "Żubr Credit Card", which is now used by over 34.7 thousand clients.

We also ran promotional campaigns to support the sale of accounts for children and youth. Parents were encouraged to open their child's first account through attractive incentives. We offered competitive interest rates on the "Mój Skarb" savings account. Additionally, we conducted extensive activities to build the Bank's image among young clients, supporting their passions – in sports, gaming and music (e.g. partnering with the Bittersweet festival in Poznań).

In 2025, we achieved very good sales results in the area of cash loans. The value of cash loans granted amounted to PLN 7.4 billion in net volumes, i.e. 17% more than last year. The gross value of new contracts signed amounted to PLN 8.9 billion.

In 2025, we also were successfulin mortgage lending. Sales reached PLN 10.8 billion. Despite intensifying competition, we maintained a strong market position, thanks in part to the consistent positioning of Pekao's offer among the most competitive in the market.

Also in the business customer segment we achieved an increase in sales, new sales of total financing (loans, leasing and factoring) amounted to PLN 3.3 million and were higher by +13.5% y/y. Sales of bank loans in the business segment amounted to PLN 1.4 billion. The Bank provides customers with simplified and fast paths in the credit procedure, including pre-limit-based solutions that reduce the time needed to obtain funds.

In 2025, we consistently developed sales of insurance products. We conducted intensive marketing activities and personalized communication with the use of the CRM system, which are aimed at increasing customer awareness of the insurance offer and current promotions, m.in. for travel or motor insurance during the holiday season. The premium collected from insurance products was 4.6% higher than in 2024. The bank's share in the bancassurance market reached 16% at the end of 2025.

In 2025, we achieved very good results in the area of sales of investment products. Total net sales of investment products (retail and private banking clients) amounted to PLN 19.3 billion, with a growth rate of +10.2% y/y. We recorded a record-breaking acquisition in the Private Banking segment – nearly 2 thousand new clients.

Thanks to effective business initiatives aimed at strengthening existing and building new competitive advantages in the SME and MID segments, we have continued to reinforce the Bank's market position in this area. We offer our clients a broad, comprehensive range of products and services, including bank loans, leasing, factoring, bond issuance, and other specialised forms of financing.

In 2025, we further expanded our offering with new solutions, such as:

- Signing an agreement with the European Investment Fund (EIF) for preferential financing totalling over PLN 1.25 billion under the InvestEU programme. This collaboration provides credit guarantees covering up to 80% of the financing amount granted by the Bank,
- Increasing access to mortgage loans and SMEX express loans for small and medium-sized enterprises, enabling more firms to benefit from flexible financing options,
- Raising the guarantee limit under the Investmax programme, allowing SME clients to obtain higher credit security and scale up their investment projects,
- Introducing credit products based on POLSTR, providing customers with financing based on the new indicator.

In 2025, we acquired 2.8 thousand customers in the SME segment and 1.1 thousand new customers in the MID segment (+26% y/y). The value of new loans sold (excluding renewals) in the SME segment reached PLN 7.7 billion (+16% y/y). On the other hand, in the MID segment, the value of new loans sold amounted to PLN 16.0 billion (+19.5% y/y).

In corporate banking, we focus on expanding specific business areas using advanced tools that support the work of advisors, product specialists and analysts. While nurturing long-term business relationships and establishing new ones, we engage in projects with major corporate clients, public sector entities, the commercial real estate sector and financial institutions.

Our activities are multifaceted – we closely collaborate with leading firms and play a key role in strategic projects supporting the Polish economy. In the public sector, we work with nearly all Polish metropolitan areas (11 out of 12), over 50 public universities, and are one of the two most frequently selected banks by local governments issuing bonds. We are actively involved in the transformation of the Polish economy, also developing investment banking, specialised financing, transactional banking, treasury, and international banking – supporting our clients' global expansion.

In 2025, we consistently strengthened our leading market position, reflected in stable income results, market shares and numerous industry awards. At the end of 2025, we served over 7 thousand corporate clients. The volume of gross corporate loans amounted to PLN 64.8 billion (+10% y/y), while loans to the public sector amounted to PLN 11.5 billion (+10% y/y).

Accessibility Pillar

At the heart of our operations is the client and their needs. We are intensively developing digital channels and fast, user-friendly service processes.

In 2025, a key organisational focus was on improving the client experience management model, which was implemented at the end of the previous year. Our aim was not only to embed the model in everyday operational practice but also to establish it as a standard guiding the organisation's future development. In this context, a number of initiatives were undertaken to promote this new approach – both by raising awareness among employees and through its practical implementation in core business processes.

The client experience management model was designed to ensure that every person using our services receives support of the highest standard: professional, transparent, and empathetic. Regardless of financial needs, life stage or preferred contact channel, every client can count on support that meets their expectations. Our relationships with clients are founded on security and trust, with an emphasis on proactively responding to signals and anticipating future needs.

We continuously listen to the voice of the client, using a broad spectrum of sources: internal and external research, complaints, social media feedback and opinions published on industry platforms. The data gathered is carefully analysed and used as a foundation for designing solutions tailored to actual client expectations.

As a result of these actions, client experience management has become embedded in our organisational culture, significantly strengthening the implementation of our 2025–2027 development strategy. Every business initiative and decision made within the organisation is based on thorough analysis of client needs, making client satisfaction a priority and shaping future actions accordingly.

The results achieved in 2025 confirm that we are delivering on our strategic commitment to continuously improving the client experience – including higher satisfaction scores and NPS. These trends are also reflected in independent analyses and market publications, which highlight a clear improvement in how our organisation is perceived by clients.

A key component of the strategy is the implementation of an integrated service model in the retail banking segment. In 2025, we continued intensive work on enhancing the functionality of our digital service channels. We introduced a number of new solutions in the Pekao24 online banking platform and the PeoPay mobile app. These included:

- payment rings (enabling transactions linked to debit and credit cards),
- samsung Pay digital wallet,
- e-vignettes (functionality allowing for the purchase of electronic toll passes for motorways and roads in selected European countries),
- behavioural protection service (a free solution designed to increase client safety and prevent fraud attempts),
- batch transfers (split payment functionality),
- enhancements to the interface and ergonomics of digital channels, improving user intuitiveness.

At the end of 2025, we reached the level of active mobile customers assumed in the strategy, which increased by 294 thousand to 3.7 million.

We have consistently increased the share of loans granted in remote channels in the Pekao24 service, in the PeoPay mobile application and via the Bank's line. The value of sales of cash loans concluded electronically amounted to PLN 6.0 billion, i.e. +25% y/y. The share of cash loans sold in remote channels (in volume terms) was 88%. The Bank also continued to offer preferential pricing terms to customers using remote channels when purchasing investment products, which translated into an increase in the number of transactions carried out in these channels.

The development of remote distribution channels was accompanied by activities aimed at improving the efficiency of the branch network. In 2025, the Bank reduced its network by 13 branches. At the end of the year, the network included 473 own outlets and 87 partner outlets.

Efficiency Pillar

Under the Efficiency pillar, we implemented initiatives aimed at digitalising both credit and non-credit processes in the enterprise and corporate segments, while also strengthening the Bank's technological competencies and capabilities.

To optimise key credit processes, we undertook actions focused on improving their efficiency and reducing credit decision turnaround times.

We continued to develop remote service channels for enterprise and corporate clients. We launched an upgraded version of the PekaoBiznes24 platform and introduced the new PeoBIZ 2.0 mobile application. These solutions significantly enhanced service quality by improving intuitiveness and functionality. At the same time, we expanded the client onboarding process functionalities – both remotely and in branches. As a result of these initiatives, the digitalisation rate for the SME, MID and corporate segments increased by 10 p.p. compared to the previous year.

In 2025, we also conducted a dynamic transformation across the broader IT area. Under the new strategy, we will design and implement a solid foundation for a modern data ecosystem – understood as an integrated environment of business and technical systems, management processes, organisational roles, and change governance mechanisms. This will enable the transformation of Bank Pekao into a truly data-driven organisation. One of our strategic initiatives focuses on developing the skills and technologies needed to harness the potential of artificial intelligence. In 2025, we launched new tools for employees, including those within the agent platform. These were accompanied by training initiatives to help staff deepen their expertise, use AI effectively in their daily work, and do so in a safe and responsible manner. Other modernisation efforts included further development of cloud-based solutions and the implementation of a modern, layered, scalable and secure IT architecture and infrastructure.

Business priorities for 2026

The macroeconomic environment in 2026 is expected to support the implementation of the “**"… the only way is up!"**” Strategy for 2025–2027. The Bank forecasts GDP growth in Poland of around 4.0%, alongside a decline in inflation to levels close to the National Bank of Poland’s target. These conditions should sustain strong investment and consumption activity. In particular, the anticipated acceleration in the absorption of EU Recovery Plan funds and the execution of infrastructure and energy projects will drive demand for corporate and project financing. For banks, this will mean operating in an environment of intensified competition to participate in financing such undertakings.

In terms of monetary policy, we expect the Monetary Policy Council (RPP) to lower the reference rate to its target level of 3.50% in 2026. The 2025–2027 strategy assumes an increased contribution from non-interest income, which will help mitigate the negative effects of rate cuts. Falling interest rates, along with persistently low inflation and low unemployment, should support the quality of the credit portfolio.

However, regulatory changes such as the planned increase of the CIT rate for banks to 30% in 2026 will negatively impact the Group’s results. The tax hike will lower the return on equity ratio and increase the risk of higher capital acquisition costs in financial markets.

The geopolitical environment remains a risk factor, particularly due to the ongoing conflict in Ukraine, trade tensions, and potential fragmentation of global supply chains. We continuously monitor the evolving situation, including sectoral exposures sensitive to energy price volatility and trade risks, and we adjust our actions in response to these emerging challenges.

Taking into account the opportunities and risks resulting from the macroeconomic and market environment, the bank will consistently implement the adopted strategy, while carefully monitoring the progress of its implementation.

8.2 Factors which will affect the results of the Group

The activity of Bank Pekao S.A. and the Group’s companies is in majority conducted on the Polish territory, hence the Group’s performance will be mainly affected by economic situation in the country and international events that have influence on domestic economy.

In 2025, economic growth accelerated to approx. 3.5% y/y. The key factor driving GDP growth was the strengthening of real consumption (approx. 3.5% y/y). The biggest disappointment was investment, which, despite the inflow of funds from the NGEU programme, did not reach the forecast growth rate of close to 10% y/y. The contribution of foreign trade was negative (-0.3% y/y) despite an increase in real export volume, which lagged behind accelerating imports. 2026 will be marked by accelerated growth (we forecast 4% real GDP growth), mainly due to the investment boom (9.1% y/y). Private consumption growth (3.7% y/y) will remain similar to last year's despite the slowing wage fund dynamics.

Average annual CPI inflation in 2025 stood at 3.6% y/y, but the trajectory of monthly price readings was clearly disinflationary – last year ended with a monthly reading of 2.4% y/y, below the inflation target. Disinflation will continue in 2026; we forecast that the average price growth this year will be 1.9% y/y. Factors contributing to further disinflation will include the stabilization of commodity prices (including energy) on global markets, as well as the so-called import of disinflation from China.

The growth rate of service prices will remain higher than inflation in the goods segment, but given the closing demand gap and slowing wage growth, we do not see any significant inflationary risks building up here.

Monetary policy is a key macroeconomic factor affecting the financial performance of the banking sector. In 2025, RPP cut interest rates by 175 basis points, the deepest cut in over a decade. As a result, last year ended with the policy rate of 4.00%. Despite a significant reduction in the reference rate and benchmark market rates, the banking sector's aggregate profits in 2025 amounted to PLN 48,9 billion, breaking the record set in 2024 (PLN 40.2 billion) which had been achieved, it is worth noting, under a reference rate of 5.75%. Despite the decline in interest rates, banks in Poland increased their interest income by PLN 3 billion with virtually unchanged interest costs, which on the one hand results from a significant increase in the volume of loans granted, and on the other hand reflects adjustments in deposit margins. It is also worth noting that the factor that weighed most heavily on the profit and loss account in 2025 compared to 2024 was the item “costs and depreciation,” whose increase resulted from dynamic growth in salaries. In 2026, we expect the cycle of monetary policy adjustments to come to an end and the reference rate to reach its target level of 3.25% or only slightly lower. Given the projected rebound in the credit market, especially in the residential and corporate segments, we believe that further rate cuts of 75 bp will not have a significant impact on the sector's financial results, especially in view of the observed adjustments to deposit margins in an environment of inelastic deposit supply.

Among the local factors affecting banks' results, particular attention should be paid to the issue of the CIT rate increase for the banking sector. According to the estimates of the Ministry of Finance, in 2026 banks will pay an additional PLN 6 billion in corporate income tax. The issue of tax incidence, i.e. the distribution of actual tax burdens between taxpayers (banks) and their customers, remains unclear. Only slight declines in deposit margins (understood as the difference between customer deposit interest rates and the WIBOR rate) may indicate attempts to increase the share of customers in the costs associated with fiscal changes. At the same time, increases in banks' commission income indicate that the sector is actively seeking additional sources of profit in view of the expected increase in tax burdens.

The credit boom in the corporate segment will be a promising source of additional profits for the sector; however, it is important to bear in mind the intensifying interbank competition in this segment. At the same time, we see specific sources of growth in demand for corporate credit in 2026, including investment needs related to industrial decarbonization and ESG requirements. At the same time, we expect growth in demand for alternative forms of financing, such as leasing and factoring.

On 12 February 2026, the CJEU issued a judgment in Case C 471/24 concerning interest rate clauses based on WIBOR index. The CJEU confirmed that the methodology for determining WIBOR is outside the scope of judicial review and that the variable interest rate clause itself can only be assessed in terms of transparency. Compliance with the information obligations under Directive 2014/17 is, in principle, the fulfilment of that requirement. The CJEU also pointed out that the use of a benchmark in accordance with the BMR Regulation does not in itself lead to an imbalance to the detriment of the consumer. This decision should be assessed as beneficial for the banking sector.

We consider the risk to the banking sector's performance associated with global factors to be moderate. In particular, the possible end of kinetic actions in the Russian-Ukrainian conflict will only have a limited impact on the sector's operations. The impact of peace on the decline in risk premiums will be limited due to the long-lasting, deep fiscal deficits in Poland; we also see no potential for a significant deterioration in the balance of payments. In core markets, however, the key factor of uncertainty will be the shape of Fed policy after Chairman J. Powell steps down, as well as the long-term impact of this policy on inflationary pressure in the US.

9. Statement of Financial Position and Financial Results

Consolidated income statement containing cumulated items for the period from 1 January to 31 December, 2025 and 2024 respectively is presented in the Consolidated Financial Statements of Bank Pekao S.A. Group for the year ended on 31 December 2025.

The Report on activities of Bank Pekao S.A. Group for the year 2025, includes statement of financial position in a short form and income statement in a presentation form as well as the key, selected items from these statements are discussed.

9.1 The consolidated income statement – presentation form

In 2025, the net profit of the Bank Pekao S.A. Group attributable to the Bank's shareholders amounted to PLN 7,015 million was higher by PLN 639 million, i.e. 10.0% compared to the result achieved in 2024. This was the highest result achieved in the Group's operations to date.

The results of 2025 include the establishment of provisions for consumer protection matters in the amount of PLN -202 million net, higher by PLN 150 million y/y, and the revaluation of deferred tax assets, with a positive impact on net profit in the amount of PLN 179 million.

(in PLN million)

	2025	2024	CHANGE
Net interest income	**13,693**	**12,729**	**7.6%**
Net fee and commission income	**3,154**	**2,854**	**10.5%**
Dividend,income	34	30	13.3%
Trading result	448	444	0.9%
Net other operating income and expenses	(164)	(8)	> 100%
Net non-interest income	**3,472**	**3,320**	**4.6%**
Operating income	**17,165**	**16,049**	**7.0%**
Operating costs	**(5,530)**	**(5,244)**	**5.5%**
Gross operating profit	**11,635**	**10,805**	**7.7%**
Net allowances for expected credit losses	(760)	(883)	(13.9%)
Costs of legal risk of foreign currency mortgage loans	(664)	(669)	(0.7%)
Net operating profit	**10,211**	**9,253**	**10.4%**
Contributions to the Bank Guarantee Fund	(384)	(239)	60.7%
Tax on certain financial institutions	(861)	(898)	(4.1%)
Share in profit on assiosiates	(5)	7	x
Profit before tax	**8,961**	**8,123**	**10.3%**
Income tax expense	(1,942)	(1,744)	11.4%
Net profit	**7,019**	**6,379**	**10.0%**
Attributable to equity holders of the Bank	**7,015**	**6,376**	**10.0%**
Attributable to non-controlling interest	4	3	33.3%

Operating income

The Group's operating income in 2025 amounted to PLN 17,165 million and was 7.0% higher than in 2024, mainly due to net interest income and net fee and commission income, which was driven by volume increases and increased customer activity.

Total net interest income

(in PLN million)

	2025	2024	CHANGE
Interest income and similar to interest	19,215	18,810	2.2%
Interest expense	(5,522)	(6,081)	(9.2%)
Net interest income	**13,693**	**12,729**	**7.6%**

Net interest income in 2025 amounted to PLN 13,693 million and was higher by PLN 964 million, i.e. 7.6%, compared to the result achieved in 2024, mainly due to higher volumes, especially in strategic product areas and higher interest margin, with continued high liquidity and lower costs of deposits. The 2024 results include the costs of credit holidays in the amount of PLN 153 million.

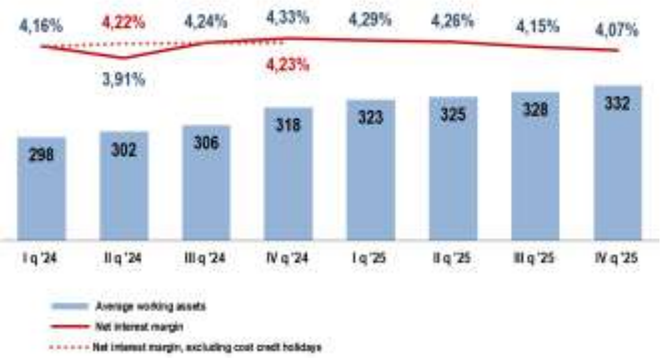
Interest income and similar to interest

In 2025, interest income and income similar to interest amounted to PLN PLN 19,215 million and were higher by PLN 405 million y/y, thanks to higher volumes, especially in the strategic areas of cash loans, growing by more than 13% y/y, corporate loans from the MID and SME segments, also growing by more than 13% y/y. The 2024 results include the costs of credit holidays in the amount of PLN 153 million.

Interest expense

Interest expense in 2025 amounted to PLN 5,522 million and was lower by PLN 559 million y/y, despite higher volumes of liabilities to customers and from the issue of debt securities, growing by 5% y/y, thanks to the effective pricing policy and management of the Group's liquidity needs

Interest margin



The net interest margin achieved in 2025 amounted to 4.2% and remained at the level recorded in 2024, excluding the costs of credit holidays, despite lower interest rates.

Net non-interest income

(in PLN million)

	2025	2024	CHANGE
Fee and commission income	4,116	3,731	10.3%
Fee and commission expense	(962)	(877)	9.7%
Net fee and commission income	**3,154**	**2,854**	**10.5%**
Dividend income	34	30	13.3%
Trading result	448	444	0.9%
Net other operating income and expense	(164)	(8)	> 100%
Net non-interest income	**3,472**	**3,320**	**4.6%**

Net fee and commission income generated in 2025 amounted to PLN 3,154 million and was higher by PLN 300 million, i.e. 10.5% compared to the result achieved in 2024, thanks to increases in all areas of the Group's operations, which was driven by growing customer activity and a favourable situation on the capital markets.

Other operating income and expenses lower y/y, mainly due to the establishment of provisions for consumer protection cases in the amount of PLN -202 million.

Non-interest income generated in 2025 amounted to PLN 3,472 million and was higher by PLN 152 million, i.e. 4.6% compared to the result achieved in the previous year, mainly due to higher net fee and commission income.

The table below presents the Group's net fee and commission income divided according to the main areas of the activity.

(in PLN million)

	2025	2024	CHANGE
Net fee and commission income	**3,154**	**2,854**	**10.5%**
on loans	658	628	4.8%
on cards	342	308	11.0%
on mutual funds	605	477	26.8%
on brokerage activate	207	156	32.7%
on margins on foreign exchange transactions with clients	752	707	6.4%
other	590	578	2.1%

Operating costs

Operating expenses in 2025 amounted to PLN 5,530 million and were higher by PLN 286 million, i.e. 5.5% compared to 2024, supporting business development, with the costs of salaries and other employee benefits lower by 1.5% y/y, thanks to the launch of the voluntary redundancy program at the end of 2024.

(in PLN million)

	2025	2024	CHANGE
Personnel expenses	(3,257)	(3,306)	(1.5%)
General administrative expenses and depreciation	(2,273)	(1,938)	17.3%
Operating costs	**(5,530)**	**(5,244)**	**5.5%**

Costs/income (including contributions to the Bank Guarantee Fund) in 2025 amounted to 34.5% compared to 34.2% in the same period of 2024.

Contributions to the Bank Guarantee Fund

Contributions to the Bank Guarantee Fund in 2025 amounted to PLN 384 million and were higher by PLN 145 million, i.e. 60.7% than in 2024 due to the restoration of contributions to the Bank Guarantee Fund, which had not been collected for the last two years, and an increase in the volume of guaranteed funds.

Tax on certain financial institutions

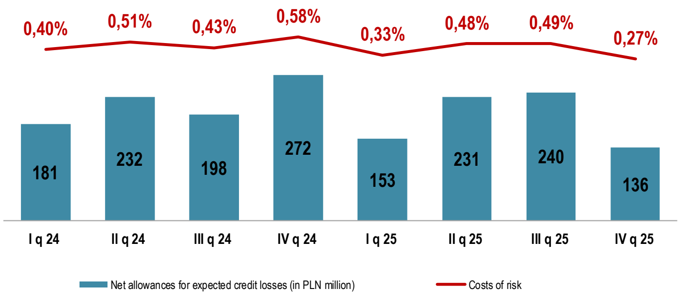
The tax on certain financial institutions in 2025 amounted to PLN 861 million and was lower by PLN 37 million, i.e. 4.1% than in 2024.

Net allowances for expected credit losses and cost of risk

(in PLN million)

	2025	2024	CHANGE
financial assets measured at amortized cost	(845)	(913)	(7.4%)
financial assets measured at fair value through other comprehensive income	(37)	8	x
financial liabilities measured at amortized cost	122	22	> 100%
Net allowances for expected credit losses	**(760)**	**(883)**	**(13.9%)**
Costs of legal risk of foreign currency mortgage loans	**(664)**	**(669)**	**(0.7%)**

Net allowances for expected credit losses in 2025 amounted to PLN 760 million and was lower by PLN 123 million, i.e. 13.9% than in 2024.



The Group's cost of risk in 2025 amounted to 0.39% and was lower by 0.09 p.p. than in the previous year and is in line with the strategic assumptions and the adopted risk appetite. The decrease in the cost of risk is mainly due to a lower loss ratio of the loan portfolio, in particular the retail loan portfolio, which was also reflected in a gradual improvement in the parameters used in the valuation and income from the sale of the loan receivables portfolio.

9.2 Structure of the consolidated statement of financial position – short form

The balance sheet of Bank Pekao S.A. determines the amount of total assets in balance sheet and the structure of the assets and liabilities of the Group. As at the end of Decemebr 2025, the total assets of Bank Pekao S.A. constitutes 95.9% of the total assets of the whole Group.

The table below presents the Group's statement of financial position – short form.

ASSETS	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Cash and cash equivalents (*)	12,016	3.4%	14,269	4.3%	(15.8%)
Loans and advances to banks (**)	501	0.1%	172	0.1%	> 100%
Loans and advances to customers (***)	197,343	56.0%	182,158	54.5%	8.3%
Reverse repo transactions	4,715	1.3%	4,685	1.4%	0.6%
Securities (****)	122,628	34.8%	119,772	35.8%	2.4%
Investments in associates	152	0.0%	59	0.0%	> 100%
Property, plant and equipment and intangible assets	4,784	1.4%	4,573	1.4%	4.6%
Other assets	10,094	2.9%	8,554	2.6%	18.0%
Total assets	**352,233**	**100.0%**	**334,242**	**100.0%**	**5.4%**

(*) Cash and cash equivalents include cash in hand, amounts due from the National Bank of Poland, as well as amounts due from banks with a maturity of up to 3 months.

(**) Including net investments in financial leases to banks.

(***) Including net investments in financial leases to customers and non-treasury debt securities.

(****) Including financial assets held for trading. other financial instruments at fair value through profit and loss and excluding non-treasury debt securities.

EQUITY AND LIABILITIES	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Amounts due to other banks	5,748	1.6%	7,344	2.2%	(21.7%)
Amounts due to customers	268,463	76.2%	259,034	77.5%	3.6%
Debt securities issued	20,265	5.8%	16,167	4.8%	25.3%
Subordinated liabilities	5,642	1.6%	2,782	0.8%	> 100%
Repo transactions	1,089	0.3%	1,000	0.3%	8.9%
Other liabilities	15,664	4.4%	16,001	4.8%	(2.1%)
Total equity including	35,362	10.0%	31,914	9.5%	10.8%
non-controlling interests	14	0.0%	13	0.0%	11.5%
Total liabilities	**352,233**	**100.0%**	**334,242**	**100.0%**	**5.4%**

Assets

Changes in the structure of assets

The main items in the asset structure are loans and advances to customers and securities, which accounted for 56.0% and 34.8% of the balance sheet total at the end of 2025 (54.5% and 35.8%, respectively, at the end of 2024).

Customers' Financing

Customer structure of loans and advances

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Loans and advances at nominal value (*)	**202,214**	**186,507**	**8.4%**
Loans and investments in financial leases	189,141	174,800	8.2%
Retail	88,005	83,768	5.1%
Corporate	101,136	91,032	11.1%
Non-treasury debt securities	13,073	11,707	11.7%
Other (**)	1,559	1,631	(4.4%)
Impairment allowances	**(6,430)**	**(5,980)**	**7.5%**
Total net receivables	**197,343**	**182,158**	**8.3%**
Reverse repo transactions	4,706	4,673	0.7%
Total Customers' financing (***)	**206,920**	**191,180**	**8.2%**

(*) Excluding reverse repo transactions.

(**) Including interest and receivables in transit.

(***) Total customers' financing includes loans and advances at nominal value. securities issued by non-monetary entities and reverse repo transactions.

As at the end of December 2025, loans and advances at nominal value amounted to PLN 202,214 million and were higher by PLN 15,707 million, i.e. 8.4%, than at the end of December 2024.

At the end of December 2025, the volume of retail loans amounted to PLN 88,005 million and were higher by PLN 4,237 million, i.e. 5.1% than at the end of December 2024, thanks to the sale of cash loans higher by 17.3% y/y, which allowed for an increase in volumes by 13.1% y/y and sales of mortgage loans at the level of PLN 10,8 billion, which allowed for an increase in volumes by 3.6% y/y.

At the end of December 2025, corporate loans, including non-Treasury debt securities, amounted to PLN 114,209 million and were higher by PLN 11,470 million, i.e. 11.2%, compared to the end of December 2024, mainly due to a strong increase in corporate loans in the MID and SME segments by 13.1% y/y and loans to large enterprises by 11.4% y/y, with the acquisition of over 3.8 thousand new customers and an enriched product offer.

Receivables and impairment losses (*)

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Gross receivables	**203,773**	**188,138**	**8.3%**
Stage 1	176,425	160,546	9.9%
Stage 2	18,348	19,179	(4.3%)
Stage 3	9,000	8,413	7.0%
Impairment allowances	**(6,430)**	**(5,980)**	**7.5%**
Stage 1	(754)	(676)	11.5%
Stage 2	(563)	(864)	(34.8%)
Stage 3	(5,113)	(4,440)	15.2%
Total net receivables	**197,343**	**182,158**	**8.3%**

(*) Including net investments in financial leases to customers. non-treasury debt securities. interest and receivables in transit and excluding reverse repo transactions.

As at the end of December 2025 the ratio of impaired receivables (stage 3) to the gross receivables amounted to 4.5%.

Loans and advances to customers by currency (*)

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Denominated in PLN	165,708	81.3%	152,418	81.0%	8.7%
Denominated in foreign currencies (**)	38,065	18.7%	35,720	19.0%	6.6%
Total	**203,773**	**100.0%**	**188,138**	**100.0%**	**8.3%**
Impairment allowances	(6,430)	x	(5,980)	x	7.5%
Total net	**197,343**	**x**	**182,158**	**x**	**8.3%**

(*) Including net investments in financial leases to customers. non-treasury debt securities. interest and receivables in transit and excluding reverse repo transactions.

(**) Including indexed loans.

The currency structure of loans and advances to customers is dominated by amounts expressed in the Polish złoty, as at the end of December 2025 their share was 81.3%. The largest portion of foreign currency loans and advances to customers were represented by those denominated in EUR (93.7%), *Loans and advances to customers by contractual maturities (*)*

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Current and up to 1 month	24,272	11.9%	22,502	12.0%	7.9%
1 to 3 months	7,940	3.9%	7,385	3.9%	7.5%
3 months to 1 year	21,312	10.5%	19,328	10.3%	10.3%
1 to 5 years	67,405	33.1%	62,143	33.0%	8.5%
Over 5 years	77,618	38.1%	71,616	38.1%	8.4%
Past due	3,667	1.8%	3,533	1.9%	3.8%
Other	1,559	0.8%	1,631	0.9%	(4.4%)
Total	**203,773**	**100.0%**	**188,138**	**100.0%**	**8.3%**
Impairment allowances	(6,430)	x	(5,980)	x	7.5%
Total net	**197,343**	**x**	**182,158**	**x**	**8.3%**

(*) Including net investments in financial leases to customers. non-treasury debt securities. interest and receivables in transit and excluding reverse repo transactions.

As at the end of December 2025 loans and advances with maturity over 5 years represents 38.1% of total loans and advances (mainly attributed to mortgage loans, investment loans and non-treasury debt securities).

Liabilities

Changes in the structure of liabilities

The largest part of the Bank's liabilities are funds obtained from customers. As at the end of 2025, liabilities to customers, liabilities arising from the issue of debt securities and subordinated liabilities amounted to PLN 294,370 million, and their share in the balance sheet total amounted to 83.6% (83.2% at the end of 2024). The share of equity in the balance sheet total was 10.0% at the end of 2024 (9.5% at the end of 2024).

External sources of financing

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Amounts due to other banks	5,748	7,344	(21.7%)
Amounts due to customers	268,463	259,034	3.6%
Debt securities issued	20,265	16,167	25.3%
Subordinated liabilities	5,642	2,782	> 100%
Repo transactions	1,089	1,000	8.9%
Total external sources of financing	**301,207**	**286,327**	**5.2%**

The operating activity of Bank Pekao S.A. is conducted exclusively in the territory of the Republic of Poland. The Bank's deposit base is highly diversified, with both retail and corporate clients as depositors. The Bank also obtains funds from the interbank market, but it is not dependent on a single client or a group of clients. Detailed information on the issue of securities, which are also an important source of financing for operations, is presented in the point: Other Information *Information on the issuance, redemption and repayment of debt securities.*

Amounts due to customers and debt securities issued

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Amounts due to customers (*)	**268,463**	**259,034**	**3.6%**
Corporate deposits	**113,307**	**109,183**	**3.8%**
Non-financial entities	79,996	79,810	0.2%
Non-banking financial entities	11,462	9,259	23.8%
Budget entities	21,849	20,114	8.6%
Retail deposits	**154,482**	**148,844**	**3.8%**
Other (**)	674	1,007	(33.1%)
Repo transactions	*1,089*	*1,000*	*8.9%*
Debt securities issued of which	**20,265**	**16,167**	**25.3%**
Senior bonds	9,873	6,456	52.9%
Pekao Bank Hipoteczny S.A. covered bonds	1,458	1,428	2.1%
Pekao Bank Hipoteczny S.A. bonds	412	565	(27.1%)
Pekao Leasing Sp. z o.o. bonds	5,071	3,490	45.3%
Pekao Faktoring Sp. z o.o. bonds	3,296	4,119	(20.0%)
Interest	155	109	42.2%
Investment funds of Pekao TFI S.A. (ex. Pioneer Pekao TFI)	**41,224**	**32,189**	**28.1%**
Bond and money market funds	29,053	23,363	24.4%
Balanced funds	7,067	5,055	39.8%
Equity funds	2,518	2,131	18.2%
PPK	2,586	1,640	57.7%
including distributed through the Group's network	35,814	28,308	26.5%

(*) Excluding repo transactions and lease liabilities.

(**) Other item includes interest and funds in transit.

As at the end of December 2025, liabilities to the Group's customers amounted to PLN 268,463 million and were higher by PLN 9,429 million, i.e. 3.6%, than at the end of December 2024.

As at the end of December 2025, retail and other amounted to PLN 155,098 million and were higher by PLN 5,388 million, i.e. 3.6%, compared to the end of December 2024.

As at the end of December 2025, corporate and other amounted to PLN 113,365 million and were higher by PLN 4,041 million, i.e. 3.7%, compared to the end of December 2024.

As at the end of December 2025, the net assets of investment funds managed by Pekao TFI S.A. amounted to PLN 41,224 million and were higher by PLN 9,035 million, i.e. 28.1% compared to the end of December 2024, thanks to both higher valuation and high net sales of investment funds in 2025 at the level of PLN 5.6 billion.

Amounts due to customers by currency (*)

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Denominated in PLN	225,287	83.9%	215,937	83.4%	4.3%
Denominated in foreign currencies	43,176	16.1%	43,097	16.6%	0.2%
Total	**268,463**	**100.0%**	**259,034**	**100.0%**	**3.6%**

(*) Including interest and amounts due in transit and excluding repo transactions and lease liabilities.

The bulk of the amounts due to customers are denominated in the Polish currency and its share as at the end of December 2025 amounted to 83.9%. The majority of amounts due to customers denominated in foreign currencies were in EUR (65.3%) and USD (28.4%).

Amounts due to customers by contractual maturities (*)

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Current accounts and overnight deposits	203,209	75.9%	186,918	72.4%	8.7%
Term deposits	64,580	24.1%	71,109	27.6%	(9.2%)
Total deposits	**267,789**	**100.0%**	**258,027**	**100.0%**	**3.8%**
Interest accrued	353	x	638	x	(44.7%)
Funds in transit	321	x	369	x	(12.7%)
Total	**268,463**	**x**	**259,034**	**x**	**3.6%**

(*) Excluding repo transactions and lease liabilities.

Provisions, deferred tax assets and liabilities

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Total provisions	**2,634**	**2,310**	**14.0%**
provisions for off-balance sheet commitments and guarantees given	350	477	(26.6%)
provisons for defined benefit plans	319	313	2.0%
other provisions	1,965	1,520	29.3%
Deferred tax liabilities	**21**	**18**	**15.1%**
Deferred tax assets	**1,426**	**1,343**	**6.2%**

Off–balance sheet items

Bank Pekao S.A. Group - Statement of Off-balance sheet items

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Contingent liabilities granted and received	117,632	108,023	8.9%
Liabilities granted:	78,764	72,994	7.9%
financial	65,097	62,149	4.7%
guarantees	13,667	10,845	26.0%
Liabilities received:	38,868	35,029	11.0%
financial	338	1,396	(75.8%)
guarantees	38,530	33,633	14.6%
Derivative financial instruments	520,790	457,320	13.9%
interest rate transactions	409,299	363,619	12.6%
transactions in foreign currency and in gold	104,029	86,882	19.7%
transactions based on commodities and equity securities	7,462	6,819	9.4%
Total off-balance sheet items	**638,422**	**565,342**	**12.9%**

Information on off-balance-sheet items is included in the Notes 40 to the Consolidated Financial Statements of Bank Pekao S.A. Group for the year ended on 31 December 2025.

10. Separate Statement of Financial Position and Financial Results

Separate income statement containing cumulated items for the period from 1 January to 31 December, 2025 and 2024 respectively is presented in the Separate Financial Statements of Bank Pekao S.A. for the period ended on 31 December 2025.

Below presented statement of financial position in a short form and income statement in a presentation form as well as the key, selected items from these statements are discussed.

10.1 The Separate income statement – presentation form

In 2025, the net profit of Bank Pekao S.A. amounted to PLN 6,922 million, which was higher by PLN 497 million, i.e. 7.7% compared to the result achieved in 2024. This was the highest result achieved in the Bank's operations to date.

The results of 2025 include the establishment of provisions for matters related to consumer protection in the amount of PLN - 201 million net, higher by PLN 149 million y/y, and revaluation of deferred tax assets, with a positive impact on net profit in the amount of PLN 179 million.

(in PLN million)

	2025	2024	CHANGE
Net interest income	**13,233**	**12,351**	**7.1%**
Net fee and commission income	**2,526**	**2,298**	**9.9%**
Dividend,income	291	231	26.0%
Trading result	453	426	6.3%
Net other operating income and expenses	(185)	(16)	> 100%
Net non-interest income	**3,085**	**2,939**	**5.0%**
Operating income	**16,318**	**15,290**	**6.7%**
Operating costs	**(5,083)**	**(4,794)**	**6.0%**
Gross operating profit	**11,235**	**10,496**	**7.0%**
Net allowances for expected credit losses	(606)	(638)	(5.0%)
Costs of legal risk of foreign currency mortgage loans	(648)	(618)	4.9%
Net operating profit	**9,981**	**9,240**	**8.0%**
Contributions to the Bank Guarantee Fund	(381)	(237)	60.8%
Tax on certain financial institutions	(861)	(898)	(4.1%)
Profit before tax	**8,739**	**8,105**	**7.8%**
Income tax expense	(1,817)	(1,680)	8.2%
Net profit	**6,922**	**6,425**	**7.7%**

Operating income

In 2025, the Bank's operating income amounted to PLN 16,318 million and was higher by 6.7% than in 2024, mainly due to net interest income and net fee and commission income, which was driven by volume increases and increased customer activity.

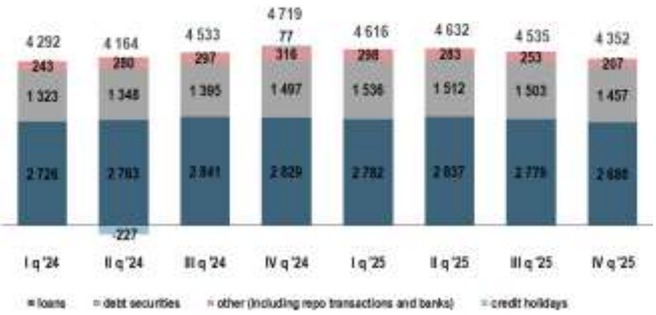
Total net interest income

(in PLN million)

	2025	2024	CHANGE
Interest income and similar to interest	18,135	17,708	2.4%
Interest expense	(4,902)	(5,357)	(8.5%)
Net interest income	**13,233**	**12,351**	**7.1%**

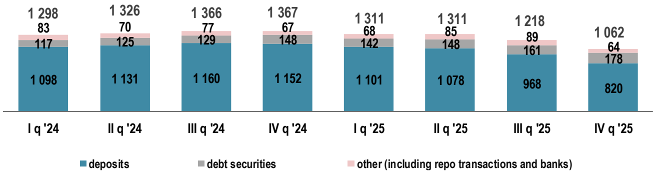
Net interest income generated in 2025 amounted to PLN 13,233 million and was higher by PLN 882 million, i.e. 7.1%, compared to the result achieved in 2024, mainly due to higher volumes, especially in strategic product areas and higher interest margin, with continued high liquidity and lower costs of deposits. The 2024 results include the costs of credit holidays in the amount of PLN 150 million.

Interest income and similar to interest



Interest and similar income in 2025 amounted to PLN 18,135 million and were higher by PLN 427 million y/y thanks to higher volumes, especially in the strategic areas of cash loans, growing by over 13% y/y, corporate loans from the MID and SME segments, also growing by more than 13% y/y. The 2024 results include the costs of credit holidays in the amount of PLN 150 million.

Interest expense



Interest expense in 2025 amounted to PLN 4,902 million and was lower by PLN 455 million y/y, despite higher volumes of liabilities to customers and from the issue of debt securities.

Net interest margin

The net interest margin achieved in 2025 amounted to 4.2% and remained at the level recorded in 2024, excluding the costs of credit holidays, despite lower interest rates.

Net non-interest income

(in PLN million)

	2025	2024	CHANGE
Fee and commission income	3,507	3,244	8.1%
Fee and commission expense	(981)	(946)	3.7%
Net fee and commission income	**2,526**	**2,298**	**9.9%**
Dividend income	291	231	26.0%
Trading result	453	426	6.3%
Net other operating income and expense	(185)	(16)	>100%
Net non-interest income	**3,085**	**2,939**	**5.0%**

Net fee and commission income generated in 2025 amounted to PLN 2,526 million and was higher by PLN 228 million, i.e. 9.9% compared to the result achieved in 2024, thanks to increases in all areas of the Bank's operations, which was driven by growing customer activity and favourable situation on the capital markets.

The Net non-interest income in 2025 amounted to PLN 3,085 million and was higher by PLN 146 million, i.e. 5.0% compared to the result achieved last year, due to the higher net fee and commission income.

Other operating income and expenses lower y/y, mainly due to the establishment of provisions for consumer protection matters in the amount of PLN -201 million.

The table below presents the Bank’s net fee and commission income divided according to the main areas of the activity.

(in PLN million)

	2025	2024	CHANGE
Net fee and commission income	**2,526**	**2,298**	**9.9%**
on loans	523	523	0.1%
on cards	342	308	10.8%
on mutual funds	146	117	25.0%
on brokerage activate	172	141	22.1%
on margins on foreign exchange transactions with clients	752	707	6.3%
other	591	502	17.9%

Operating costs

Operating expenses in 2025 amounted to PLN 5,083 million and were higher by PLN 289 million, i.e. 6.0% compared to 2024. supporting business growth, with the cost of salaries and other employee benefits at the level of the previous year, thanks to the launch of the voluntary redundancy program at the end of 2024.

(in PLN million)

	2025	2024	CHANGE
Personnel expenses	(2,896)	(2,889)	0.2%
General administrative expenses and depreciation	(2,187)	(1,905)	14.8%
Operating costs	**(5,083)**	**(4,794)**	**6.0%**

The cost/income ratio (including BFG contributions) in 2025 was 33.5% compared to 32.9% in 2024.

Contributions to the Bank Guarantee Fund

Bank Guarantee Fund in 2025 amounted to PLN 381 million and were higher by PLN 144 million, i.e. 60.8% than in 2024, due to the restoration of contributions to the Bank Guarantee Fund, which had not been collected for the last two years, and an increase in the volume of guaranteed funds.

Tax on certain financial institutions

The tax on certain financial institutions in 2025 amounted to PLN 861 million and was lower by PLN 37 million, i.e. 4.1% than in 2024.

Net allowances for expected credit losses and cost of risk

(in PLN million)

	2025	2024	CHANGE
financial assets measured at amortized cost	(617)	(686)	(10.1%)
financial assets measured at fair value through other comprehensive income	(11)	20	x
financial liabilities measured at amortized cost	151	28	> 100%
Net allowances for expected credit losses	**(606)**	**(638)**	**(5.0%)**
Costs of legal risk of foreign currency mortgage loans	**(648)**	**(618)**	**4.9%**

The net allowances for expected credit losses in the 2025 amounted to PLN 606 million and were lower by PLN 32 million, i.e. 5.0% than in the 2024.

The Bank’s cost of risk in 2025 amounted to 0.34%, which is 0.04 p.p. was lower than the previous year and is in line with the strategic assumptions and the adopted risk appetite.

10.2 Structure of the separate statement of financial position – short form

The table below presents the Bank's statement of financial position – short form.

ASSETS	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Cash and due from Central Bank (*)	12,031	3.6%	14,245	4.5%	(15.5%)
Loans and advances to banks	1,006	0.3%	379	0.1%	> 100%
Loans and advances to customers (**)	179,485	53.1%	165,435	51.8%	8.5%
Reverse repo transactions	4,715	1.4%	4,685	1.5%	0.6%
Securities (***)	125,092	37.0%	121,133	37.9%	3.3%
Investments in subsidiaries	2,232	0.7%	1,922	0.6%	16.1%
Investments in associates	42	0.0%	42	0.0%	x
Property. plant and equipment and intangible assets	3,859	1.1%	3,575	1.1%	8.0%
Other assets	9,396	2.8%	7,834	2.5%	19.9%
Total assets	**337,858**	**100.0%**	**319,251**	**100.0%**	**5.8%**

(*) Cash and cash equivalents include cash in hand, amounts due from the National Bank of Poland, as well as amounts due from banks with a maturity of up to 3 months.

(**) Including non-treasury debt securities.

(***) Including financial assets held for trading, other financial instruments at fair value through profit and loss and excluding non-treasury debt securities.

EQUITY AND LIABILITIES	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Amounts due to other banks	1,913	0.6%	2,300	0.7%	(16.8%)
Amounts due to customers	268,834	79.6%	259,523	81.3%	3.6%
Debt securities issued	10,006	3.0%	6,542	2.0%	53.0%
Subordinated liabilities	5,642	1.7%	2,782	0.9%	> 100%
Repo transactions	1,089	0.3%	1,000	0.3%	8.9%
Other liabilities	15,519	4.6%	15,588	4.7%	(0.4%)
Equity	34,855	10.3%	31,516	9.9%	10.6%
Total equity and liabilities	**337,858**	**100.0%**	**319,251**	**100.0%**	**5.8%**

Assets

Changes in the structure of assets

Loans and advances to customers and securities represent items of the largest value under assets. As at the end of 2025, they accounted for 53.1 and 37.0% of the total assets respectively in comparison with 51.8% and 37.9% respectively as at the end of 2024.

Customers' Financing

Customer structure of loans and advances

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Loans and advances at nominal value (*)	**183,741**	**169,262**	**8.6%**
Loans and investments in financial leases	166,845	153,251	8.9%
Retail	84,724	81,181	4.4%
Corporate	82,121	72,070	13.9%
Non-treasury debt securities	16,896	16,011	5.5%
Other (**)	1,552	1,541	0.7%
Impairment allowances	(5,808)	(5,368)	8.2%
Total net receivables	**179,485**	**165,435**	**8.5%**
Reverse repo transactions	4,706	4,674	0.7%
Total Customers' financing (***)	**188,447**	**173,936**	**8.3%**

(*) Excluding reverse repo transactions.

(**) Including interest and receivables in transit.

(***) Total customers' financing includes loans and advances at nominal value, securities issued by non-monetary entities and reverse repo transactions.

As at the end of December 2025, loans and advances at nominal value amounted PLN 183,741 million and were higher by PLN 14,479 million, i.e. 8.6%, than at the end of December 2024.

As at the end of December 2025, the volume of retail loans amounted to PLN 84,724 million and were higher by PLN 3,543 million, i.e. 4.4% than at the end of December 2024, thanks to the sale of cash loans higher by 17.3% y/y, which allowed for an increase in volumes by 13.1% y/y and sales of mortgage loans at the level of PLN 10,8 billion, which allowed for an increase in volumes by 2.8% y/y.

As at the end of December 2025, corporate loans and non-treasury debt securities amounted to PLN 99,017 million and were higher by PLN 10,936 million, i.e. 12.4%, compared to the end of December 2024, mainly due to a strong increase in corporate loans in the MID and SME segments by 13.1% y/y and loans to large enterprises by 11.4% y/y, with the acquisition of over 3.8 thousand new customers and an enriched product offer.

***Receivables and impairment losses*(*)**

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Gross receivables	**185,293**	**170,803**	**8.5%**
Stage 1	160,019	145,634	9.9%
Stage 2	17,910	18,645	(3.9%)
Stage 3	7,364	6,524	12.9%
Impairment allowances	**(5,808)**	**(5,368)**	**8.2%**
Stage 1	(722)	(651)	10.9%
Stage 2	(550)	(849)	(35.2%)
Stage 3	(4,536)	(3,868)	17.3%
Total net receivables	**179,485**	**165,435**	**8.5%**

(*) Including non-treasury debt securities, interest and receivables in transit and excluding reverse repo transactions.

As at the end of December 2025 the ratio of impaired receivables (stage 3) to the gross receivables amounted to 4.0%.

***Loans and advances to customers by currency*(*)**

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Denominated in PLN	153,134	82.6%	140,149	82.1%	9.3%
Denominated in foreign currencies(**)	32,159	17.4%	30,654	17.9%	4.9%
Total	**185,293**	**100.0%**	**170,803**	**100.0%**	**8.5%**
Impairment allowances	(5,808)	x	(5,368)	x	8.2%
Total net receivables	**179,485**	**x**	**165,435**	**x**	**8.5%**

(*) Including non-treasury debt securities, interest and receivables in transit and excluding reverse repo transactions.

(**) Including indexed loans.

The currency structure of loans and advances to customers is dominated by amounts expressed in the Polish złoty, as at the end of December 2025, their share was 82.6%. The largest portion of foreign currency loans and advances to customers were represented by those denominated in EUR (92.6%), and USD (5.1%).

***Loans and advances to customers by contractual maturities*(*)**

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Current and up to 1 month	22,314	12.0%	20,508	12.0%	8.8%
1 to 3 months	5,377	2.9%	5,624	3.3%	(4.4%)
3 months to 1 year	17,361	9.4%	16,519	9.7%	5.1%
1 to 5 years	61,556	33.2%	55,834	32.7%	10.2%
Over 5 years	73,944	39.9%	68,332	40.0%	8.2%
Past due	3,189	1.7%	2,446	1.4%	30.4%
Other	1,552	0.8%	1,541	0.9%	0.7%
Total	**185,293**	**100.0%**	**170,803**	**100.0%**	**8.5%**
Impairment allowances	(5,808)	x	(5,368)	x	8.2%
Total net receivables	**179,485**	**x**	**165,435**	**x**	**8.5%**

(*) Including non-treasury debt securities, interest and receivables in transit and excluding reverse repo transactions.

As at the end of December 2025, loans and advances with maturity over 5 years represents 39.9% of total loans and advances (mainly attributed to mortgage loans, investment loans, and non-treasury debt securities).

Information on loan concentration is included in the Note 20 to the Separate Financial Statements of Bank Pekao S.A. for the year ended on 31 December 2025.

Liabilities

Changes in the structure of liabilities
The largest part of the Bank's liabilities are funds obtained from customers. At the end of 2025, liabilities to customers, liabilities arising from the issuance of debt securities and subordinated liabilities amounted to PLN 284,482 million, and their share in the balance sheet total amounted to 84.2% (84.2% at the end of 2024). The share of equity in the balance sheet total was 10.3% at the end of 2025 (9.9% at the end of 2024).

External sources of financing

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Amounts due to other banks	1,913	2,300	(16.8%)
Amounts due to customers	268,834	259,523	3.6%
Debt securities issued	10,006	6,542	53.0%
Subordinated liabilities	5,642	2,782	> 100%
Repo transactions	1,089	1,000	8.9%
Total external sources of financing	**287,484**	**272,147**	**5.6%**

The deposit base is widely diversified and is sourced from retail and corporate customers. In addition, the Bank uses also funds borrowed on the interbank market. The Bank is not dependent on any single customer nor group of customers.

Amounts due to customers and debt securities issued

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Amounts due to customers (*)	**268,834**	**259,523**	**3.6%**
Corporate deposits	**113,677**	**109,671**	**3.7%**
Non-financial entities	79,943	79,708	0.3%
Non-banking financial entities	11,826	9,791	20.8%
Budget entities	21,908	20,172	8.6%
Retail deposits	**154,482**	**148,844**	**3.8%**
Other (**)	675	1,008	(33.0%)
Repo transactions	*1,089*	*1,000*	8.9%
Debt securities issued of which	**10,006**	**6,542**	**53.0%**
Senior bonds	9,873	6,456	52.9%
Interest	133	86	54.7%
Investment funds of Pekao TFI S.A. (ex. Pioneer Pekao TFI)	**41,224**	**32,189**	**28.1%**
including distributed through the Bank's network	34,595	27,414	26.2%

(*) Excluding repo transactions.

(**) Other item includes interest and funds in transit.

As at the end of December 2025, liabilities to the Bank's customers amounted to PLN 268,834 million and were higher by PLN 9,311 million, i.e. 3.6%, than at the end of December 2024.

As at the end of December 2025, retail and other amounted to PLN 155,099 million and were higher by PLN 5,390 million, i.e. 3.6%, compared to the end of December 2024.

Corporate and other amounted to PLN 113,735 million at the end of December 2025 and were higher at PLN 3,921 million, i.e. 3.6% compared to the end of December 2024.

As at the end of December 2025, the net assets of investment funds managed by Pekao TFI S.A. amounted to PLN 41,224 million and were higher by PLN 9,035 million, i.e. 28.1%, compared to the end of December 2024, thanks to both higher valuation and high net sales of investment funds in 2025 at the level of PLN 5.6 billion.

Amounts due to customers by currency(*)

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Denominated in PLN	225,677	83.9%	216,466	83.4%	4.3%
Denominated in foreign currencies	43,157	16.1%	43,057	16.6%	0.2%
Total	**268,834**	**100.0%**	**259,523**	**100.0%**	**3.6%**

(*) Including interest and amounts due in transit and excluding repo transactions and lease liabilities.

The bulk of the amounts due to customers are denominated in the Polish currency and its share as at the end of December 2025 amounted to 83.9%. The majority of amounts due to customers denominated in foreign currencies were in EUR (65,3%) and USD (28.4%).

Amounts due to customers by contractual maturities(*)

	31.12.2025		31.12.2024		CHANGE
	PLN MILLION	STRUCTURE	PLN MILLION	STRUCTURE	
Current accounts and overnight deposits	203,481	75.9%	187,107	72.4%	8.8%
Term deposits	64,678	24.1%	71,408	27.6%	(9.4%)
Total deposits	**268,159**	**100.0%**	**258,515**	**100.0%**	3.7%
Interest accrued	353	x	639	x	(44.8%)
Funds in transit	322	x	369	x	(12.7%)
Total	**268,834**	**x**	**259,523**	**x**	**3.6%**

(*) Excluding repo transactions and lease liabilities.

Provisions, deferred tax assets and liabilities

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Total provisions	**2,675**	**2,164**	**23,6%**
provisions for off-balance sheet commitments	403	519	(22,3%)
provisions for liabilities to employees	314	306	2,6%
other provisions	1 958	1 339	46,3%
Deferred tax liabilities	**-**	**-**	**x**
Deferred tax assets	**1 043**	**964**	**8,2%**

Off–balance sheet items

(in PLN million)

	31.12.2025	31.12.2024	CHANGE
Contingent liabilities granted and received	140,170	131,323	6.7%
Liabilities granted:	102,200	97,886	4.4%
financial	66,798	66,185	0.9%
guarantees	35,402	31,701	11.7%
Liabilities received:	37,970	33,437	13.6%
financial	169	541	(68.7%)
guarantees	37,801	32,896	14.9%
Derivative financial instruments	521,988	458,240	13.9%
interest rate transactions	410,497	364,404	12.6%
transactions in foreign currency and in gold	104,029	87,017	19.5%
transactions based on commodities and equity securities	7,462	6,819	9.4%
Total off-balance sheet items	**662,158**	**589,563**	**12.3%**

Information on off-balance-sheet items is included in the Notes 39 to the Separate Financial Statements of Bank Pekao S.A. for the year ended on 31 December 2025.

11. Other Information

Information required pursuant to Art. 111a of the Banking Law
Bank Pekao S.A. is a universal commercial bank providing a full range of banking services to individual and institutional clients in Poland. Bank Pekao S.A. Group includes financial institutions operating in banking, asset management, pension funds, brokerage services, transactional advisory, leasing and factoring markets.

The Bank and all subsidiaries of the Bank, within a consolidated basis under article 4, section 1, point 48 of the Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms, run its activities on territory of Poland.

As at the end of December 2025, the number of full-time jobs in the Group was 14,839 compared to 15,101 as at the end of 2024. As at the end of December 2025, the number of full-time jobs in the Bank was 13,707 compared to 12,602 as at the end of 2024.

In 2025, the Group's operating income amounted to PLN 17,165 million, and was higher by 6.7% in comparison 2024.

In 2025, the Bank's operating income amounted to PLN 16,318 million, and was higher by 4.3% in comparison 2024.

Profit before tax of Bank Pekao S.A. Group in 2025 amounted to PLN 8,961 million and was higher by PLN 838 million, in comparison to 2024. Income tax expense in 2025 amounted to PLN 1,942 million vs. PLN 1,744 million in 2024 and was higher by 11.4%.

Profit before tax of Bank Pekao S.A. in 2025 amounted to PLN 8,379 million and was higher by PLN 634 million in comparison to 2024. Income tax expense in 2025 amounted to PLN 1,817 million vs. PLN 1,680 million in 2024 and was higher by 8.2%.

As at the end of December 2025, the return on assets (ROA) of the Group was 2.1% vs. 2.0% at the end of December 2024.

As at the end of December 2025, the return on assets (ROA) of the Bank was 2.1% vs. 2.1% at the end of December 2024.

In 2025, the Bank do not conclude any agreements according to article 141t, section 1 of the Banking Law Act.

Management Board position regarding the possibility of achieving previously published forecasts
The Bank has not published the forecast of the financial results for 2025.

Information on significant agreements
In 2025, there have been no other significant agreements concluded by the Bank, in particular the Bank has not concluded material agreements with Central Bank or the competent supervision authorities.

Management Board remunerations
The amount of remunerations or benefits (in cash, payments in kind or in any form) paid or due to the Management Board Members in 2025.

(in PLN thousand)

NAME	PERIOD	BASE SALARY	VARIABLE REMUNERATION(*)	OTHER BENEFITS(**)
Cezary Stypułkowski	01.01.2025 - 31.12.2025	1,539	100	17
Marcin Gadomski	01.01.2025 - 31.12.2025	1,487	1,317	37
Łukasz Januszewski	01.09.2025 - 31.12.2025	496	-	26
Michał Panowicz	01.09.2025 - 31.12.2025	496	-	96
Robert Sochacki	01.01.2025 - 31.12.2025	1,487	193	54
Błażej Szczecki	01.01.2025 - 31.12.2025	1,487	1,187	48
Dagmara Wojnar	01.01.2025 - 31.12.2025	1,487	185	64
Marcin Zygmanowski	01.01.2025 - 31.12.2025	1,487	66	57

(*) The variable remuneration includes cash bonuses paid in 2025 for the years 2021 and 2024 as well as phantom shares and benefits for the years 2020-2023 resulting from the Variable Remuneration System.

(**) Other benefits include: housing allowance, insurance policies, medical care, among others.

The part of the variable remuneration in phantom shares due to the current Members of the Bank's Management Board as at 31 December 2025 and remaining in retention amounts to 12.3 thousand shares. The value of this part of the variable remuneration as at 31 December 2025 is PLN 2,515.4 thousand at the Bank's share price of PLN 205.1 as at 30 December 2025.

Members of the Bank's Management Board did not receive any remuneration in any form in 2025, nor do they have any receivables from the Bank's subsidiaries and associates.

Former Members of the Bank's Management Board remuneration

The value of variable remuneration paid to former Members of the Bank's Management Board who ceased to perform their functions in the Bank's Management Board before 1 January 2025 amounted to PLN 8,519 thousand in 2025.

The part of variable remuneration in phantom shares due to former Members of the Bank's Management Board who ceased to perform their functions in the Bank's Management Board before 1 January 2025 and the part of the variable remuneration in phantom shares remaining in retention amounts to 25.3 thousand shares. The value of this part of the variable remuneration as at 31 December 2025 is PLN 5,190.9 thousand according to the Bank's share price of PLN 205.1 as at 30 December 2025.

Supervisory Board remunerations

The amount of remunerations or benefits (in cash, payments in kind or in any form) paid or due to the Supervisory Board Members in 2025:

(in PLN thousand)

	PERIOD	TOTAL
Bogdan Benczak	06.11.2025 - 31.12.2025	-
Krzysztof Czeszejko-Sochacki	01.01.2025 - 31.12.2025	308
Diana Dębowczyk	06.11.2025 - 31.12.2025	46
Magdalena Dziewguć	01.01.2025 - 31.12.2025	304
Bartosz Grześkowiak	01.01.2025 - 31.12.2025	-
Mariusz Jaszczyk	06.03.2025 - 31.12.2025	247
Andrzej Klesyk	06.03.2025 - 05.11.2025	76
Radosław Niedzielski	01.01.2025 - 05.11.2025	255
Jacek Nieścior	01.01.2025 - 31.12.2025	308
Artur Nowak-Far	01.01.2025 - 31.12.2025	308
Artur Olech	01.01.2025 - 05.03.2025	33
Witold Walkowiak	01.01.2025 - 31.12.2025	302

In 2025, the Supervisory Board Members did not receive nor are due any compensation from subsidiaries and associated entities of Bank Pekao S.A.

Compensation for the Non-Competition after the termination of the Management Services Agreement

The following Members of the Bank's Management Board: Mr. Cezary Stypułkowski - President of the Management, Mr. Marcin Gadomski - Vice President of the Management Board, Mr. Marcin Zygmanowski - Vice President of the Management Board, Mr. Robert Sochacki - Vice President of the Management Board, Mr. Błażej Szczecki - Vice President of the Management Board, Ms. Dagmara Wojnar - Vice President of the Management Board, Mr. Łukasz Januszewski - Vice President of the Management Board, Mr. Michał Panowicz - Vice President of the Management Board, in accordance with the provisions in the Management Services Agreement, are obliged to comply with the Competition Prohibition and not to conduct competitive activities during the term of the agreement and for the period specified in the agreement after its termination.

In 2025, Ms. Magdalena Zmitrowicz – Vice President of the Management Board, was paid compensation under the Non-Competition Agreement after termination of the Management Services Agreement.

Liabilities due to pensions for former supervisors and managers

In 2025, there were no liabilities arising from pensions and benefits of a similar nature for former managing and supervising persons (the Bank's Management Board and the Supervisory Board).

Shares in the Bank and related entities held by the Bank's Directors

According to the information held by the Bank, as at 31 December 2025 and as at the date of publication of this report, the Bank's management and supervisory persons did not hold any shares in Bank Pekao S.A. ani shares in entities related to the Bank.

Mr. Andrzej Klesyk, disclosed in the report for the third quarter of 2025 as holding the Bank's shares, did not hold any position in the Bank's bodies as at 31 December 2025, in connection with his resignation submitted in November 2025.

Agreements with companies entitled to auditing of financial reports

The Company auditing the financial statements of the Bank Pekao S.A. and Bank Pekao S.A. Group for the years 2024-2028 is PricewaterhouseCoopers Polska Spółka z ograniczoną odpowiedzialnością Audyt Sp.k. based on the agreement of 28 June 2024 (together with subsequent annexes).

The remuneration of the audit firm and its related entities for completed and planned services for the Bank Pekao S.A. Capital Group is presented in the table below:

(in PLN thousand)

	2025	2024
Audit of annual financial statements	3,837	3,495
Review of financial statements	493	476
Other attestation services, including sustainability reporting attestation	1,179	1,121
Tax advisory services	0	0
Other services	1,613	545
Total	**7,122**	**5,637**

The amounts above do not include value added tax (VAT).

The remuneration of the audit firm and its related entities for completed and planned services for Bank Pekao S.A. is presented in the table below:

(in PLN thousand)

	2025	2024
Audit of annual financial statements	2,295	2,089
Review of financial statements	493	476
Other attestation services, including sustainability reporting attestation	1,142	1,096
Tax advisory services	0	0
Other services	1,325	257
Total	**5,255**	**3,918**

The amounts above do not include value added tax (VAT).

Average interest rates in Bank Pekao S.A. in 2025

The average nominal interest rates for the basic types of PLN deposits for non-financial sector residents:

PLN retail deposits	1.5 p.a.
PLN corporate clients deposits	1.9 p.a

The average nominal interest rates for the PLN loans for non-financial sector residents:

Total retail loans	8.1% p.a.
mortgage	7.3% p.a.
consumption	11.0% p.a.
other	10.9% p.a.
Corporate loans	7.0% p.a.

Number and value of titles of execution and value of collaterals

Bank Pekao S.A. has established specific policy with regard to collateral accepted to secure loans and guarantees. This policy is reflected under internal rules and regulations in the Bank. The type of collateral and its value are carefully analyzed and chosen regarding the particular risk of the secured transaction.

The Bank obeys the rule, according to which the value of collateral should relate directly to the value of secured liability, that is cash provided by the Bank to a client (capital or the amount of off-balance sheet commitments granted by the Bank) together with extraneous amounts due, for example, interest or commissions.

In order to hedge risk related to lending activities the Bank accepts legal collateral under the Civil Code, the law on bills of exchange or resulting from the habits adopted in domestic or foreign trade, i.e. bank guarantees, guarantee under the Civil Code, blank of promissory notes, aval, transfer of debts, mortgages, registered pledges, pledges, assignment as collateral, transfer of assets in bank account, blockade assets on client's account.

For corporate clients, the total value of the collateral for impaired transactions as at 31 December, 2025 amounted to PLN 1,113 million. For retail clients, the total value of the collateral for impaired transactions as at 31 December, 2025 amounted to PLN 557 million.

Information on derivative financial instruments and hedge accounting

Information on derivative financial instruments and hedge accounting is included in Note 28 and 31 to the Consolidated Financial Statements of Bank Pekao S.A. Group for the year ended on 31 December 2025.

Pending litigations
Information on significant legal proceedings pending before courts, arbitration bodies or public administration authorities in respect of liabilities and receivables of the Bank and its subsidiaries is included in Note 40 to the Consolidated Financial Statements of Bank Pekao S.A. Group for the year ended on 31 December 2025.

Related party transactions
In the 2025, the Bank and its subsidiaries have not concluded any significant transactions (single or aggregate) with related entities other than those executed on arm’s length.

In the 2025, the Bank and its subsidiaries did not provide any sureties in respect of loans or advances or did not provide any guarantees to an entity or a subsidiary of such entity, which the total value would be significant.

Detailed information on related party transactions is included in Note 44 to the Consolidated Financial Statements of Bank Pekao S.A. Group for the year ended on 31 December 2025.

Seasonality or cyclical nature of the Bank’s activity
The demand for the financial services offered by the Bank is stable with no material impact of seasonal changes. Due to the nature of the Bank’s activity, it is not subject to seasonal or cyclical changes. Activities of other companies of the Bank Pekao S.A. Capital Group also does not show significant seasonal or cyclical characteristics.

Accounting principles adopted in the preparation of the report
Accounting principles adopted in the preparation of the report are described in Note 4 to the Consolidated Financial Statements of Bank Pekao S.A. Group for the year ended on 31 December 2025.

Issuance, redemption and repayment of debt securities
Senior bonds
On July 28, 2023, the Bank issued senior non-preferred bonds with a maturity of 4 years and the total nominal value amounted to PLN 0.35 billion (“SNP bonds”). The SNP bonds have an option giving the Bank the right to early redemption of the bonds within 2 years from the date of issue, subject to the approval of the Bank Guarantee Fund. The SNP bonds will constitute eligible liabilities of the Bank within the meaning of Article 97a (1) pt. 2) of the Act on the Bank Guarantee Fund, Deposit Guarantee System and Forced Restructuring of 10 June 2016. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On November 23, 2023, the Bank issued senior non-preferred eurobonds (“SNP eurobonds”) with a maturity of 4 years and the total nominal value amounted to EUR 0.5 billion. The SNP bonds have an option giving the Bank the right to early redemption of the bonds within 4 years from the date of issue, subject to the approval of the Bank Guarantee Fund. The SNP eurobonds will constitute eligible liabilities of the Bank within the meaning of Article 97a (1) pt. 2) of the Act on the Bank Guarantee Fund, Deposit Guarantee System and Forced Restructuring of 10 June 2016. The SNP eurobonds were issued under the Euro Medium Term Note Programme ("EMTN Programme") and were admitted to trading on the regulated market of the Luxembourg Stock Exchange and the Warsaw Stock Exchange S.A.

On April 26, 2024, the Bank issued senior non-preferred bonds with a maturity of 5 years and the total nominal value amounted to PLN 0.5 billion. The SNP bonds have an option giving the Bank the right to early redemption of the bonds within 4 years or 4,5 years from the date of issue, subject to the approval of the Bank Guarantee Fund. The SNP bonds will constitute eligible liabilities of the Bank within the meaning of Article 97a (1) pt. 2) of the Act on the Bank Guarantee Fund, Deposit Guarantee System and Forced Restructuring of 10 June 2016. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On 18 June 2024 the Management Board of the Bank adopted a resolution to use the option of early redemption of senior preffered bonds issued by Bank on 28 July 2023 with a total nominal value of PLN 0.75 billion. The early redemption took place on 28 July 2024 and in accordance with the regulations of the Central Securities Depository of Poland (KDPW).

On July 30, 2024, the Bank issued senior preferred bonds (“SP bonds”) with a maturity of 2,5 years and the total nominal value amounted to PLN 0.6 billion. The SP bonds have an option giving the Bank the right to early redemption of the bonds within 1,5 or 2 years from the date of issue, subject to the approval of the Bank Guarantee Fund. The SP bonds will constitute eligible liabilities of the Bank within the meaning of Article 97a (1) pt. 2) of the Act on the Bank Guarantee Fund, Deposit Guarantee System and Forced Restructuring of 10 June 2016. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On September 24, 2024, the Bank issued senior non-preferred eurobonds with a maturity of 6 years and the total nominal value amounted to EUR 0.5 billion. The SNP eurobonds have an option giving the Bank the right to early redemption of the bonds within 5 years from the date of issue, subject to the approval of the Bank Guarantee Fund. The SNP eurobonds will constitute eligible liabilities of the Bank within the meaning of Article 97a (1) pt. 2) of the Act on the Bank Guarantee Fund, Deposit Guarantee System and Forced Restructuring of 10 June 2016. The SNP eurobonds were issued under the EMTN Programme and were admitted to trading on the regulated market of the Luxembourg Stock Exchange and on the regulated market of the Warsaw Stock Exchange S.A.

On 4 March 2025 the Management Board of the Bank adopted a resolution to use the option of early redemption of senior non-preffered bonds issued by Bank on 3 April 2023 with a total nominal value of PLN 0.75 billion. The early redemption took place on 3 April 2025 and in accordance with the regulations of the Central Securities Depository of Poland (KDPW).

On June 4, 2025, the Bank issued senior non-preferred eurobonds with a maturity of 6 years and the total nominal value amounted to EUR 0.5 billion. The SNP eurobonds have an option giving the Bank the right to early redemption of the bonds within 5 years from the date of issue, subject to the approval of the Bank Guarantee Fund. The SNP eurobonds will constitute eligible liabilities of the Bank within the meaning of Article 97a (1) pt. 2) of the Act on the Bank Guarantee Fund, Deposit Guarantee System and Forced Restructuring of 10 June 2016. The SNP eurobonds were issued under the EMTN Programme and were admitted to trading on the regulated market of the Luxembourg Stock Exchange and on the regulated market of the Warsaw Stock Exchange S.A.

On September 23, 2025, the Bank issued green senior preferred eurobonds with a maturity of 7 years and the total nominal value amounted to EUR 0.5 billion. The SP eurobonds have an option giving the Bank the right to early redemption of the bonds within 6 years from the date of issue, subject to the approval of the Bank Guarantee Fund. The SP eurobonds will constitute eligible liabilities of the Bank within the meaning of Article 97a (1) pt. 2) of the Act on the Bank Guarantee Fund, Deposit Guarantee System and Forced Restructuring of 10 June 2016. The SP eurobonds were issued under the EMTN Programme and were admitted to trading on the regulated market of the Luxembourg Stock Exchange and on the regulated market of the Warsaw Stock Exchange S.A.

Subordinated bonds

On 30 October 2017 the Bank issued 10 years subordinated bonds with a total nominal value of PLN 1.25 billion. The funds from the issue were designated – after receiving the approval of the Polish Financial Supervision Authority on 21 December 2017 – to increase the Bank's Tier II capital pursuant to art. 127 para. 2 point 2 of the Banking Law and art. 63 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On 15 October 2018 the Bank issued 10 years subordinated bonds with a total nominal value of PLN 0.55 billion. The funds from the issue were designated – after receiving the approval of the Polish Financial Supervision Authority on 16 November 2018 – to increase the Bank's Tier II capital pursuant to art. 127 para. 2 point 2 of the Banking Law and art. 63 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On 15 October 2018 the Bank issued 15 years subordinated bonds with a total nominal value of PLN 0.20 billion. The funds from the issue were designated – after receiving the approval of the Polish Financial Supervision Authority on 18 October 2018 – to increase the Bank's Tier II capital pursuant to art. 127 para. 2 point 2 of the Banking Law and art. 63 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On 4 June 2019 the Bank issued 12 years subordinated bonds with a total nominal value of PLN 0.35 billion. The funds from the issue were designated – after receiving the approval of the Polish Financial Supervision Authority on 8 July 2019 – to increase the Bank's Tier II capital pursuant to art. 127 para. 2 point 2 of the Banking Law and art. 63 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On 4 December 2019 the Bank issued 12 years subordinated bonds with a total nominal value of PLN 0.40 billion. The funds from the issue were designated – after receiving the approval of the Polish Financial Supervision Authority on 10 December 2019 – to increase the Bank's Tier II capital pursuant to art. 127 para. 2 point 2 of the Banking Law and art. 63 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On 3 August 2022 the Management Board of the Bank adopted a resolution not to use the option of early redemption of subordinated bond issued by Bank on 30 October 2017 with a total nominal value of PLN 1.25 billion.

On 29 August 2023 the Management Board of the Bank adopted a resolution not to use the option of early redemption of subordinated bond issued by Bank on 15 October 2018 with a total nominal value of PLN 0.55 billion.

On 4 April 2025 the Bank issued 10 years subordinated bonds with a total nominal value of PLN 0.75 billion. The funds from the issue were designated – after receiving the approval of the Polish Financial Supervision Authority on 23 April 2025 – to increase the Bank's Tier II capital pursuant to art. 127 para. 2 point 2 of the Banking Law and art. 63 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013. The bonds were admitted to trading on the alternative trading system Catalyst operated by the Warsaw Stock Exchange S.A.

On 27 November 2025 the Bank issued subordinated bonds with a maturity of 10 years and 3 months, with a total nominal value of EUR 0.5 billion. The funds from the issue will be designated – after receiving the approval of the Polish Financial Supervision Authority – to increase the Bank's Tier II capital pursuant to art. 127 para. 2 point 2 of the Banking Law and art.

63 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013. The bonds were issued under the EMTN Programme and were admitted to trading on the regulated market of the Luxembourg Stock Exchange and on the regulated market of the Warsaw Stock Exchange S.A.

Pekao Bank Hipoteczny S.A. covered bonds
The total value of the company's liabilities due to covered bonds amounted to PLN 1,428 million (principal value) as at the end of December 2025. Liabilities from covered bonds with maturity, up to 3 months account for 1%, up to 6 months account for 9%, up to 1 year account for 4%, up to 3 years account for 18%, up to 5 years account for 30%, up to 10 years account for 16%, total nominal value.

Pekao Bank Hipoteczny S.A. bonds
The total value of the company's liabilities under bonds amounted to PLN 565 million (principal value) as at the end of December 2025 with maturity, up to 3 months account for 57%, up to 6 months account for 43%, total nominal value.

Pekao Leasing Sp. z o.o. bonds
The total value of the company's liabilities under bonds amounted to PLN 3,490 million (principal value) as at the end of December 2025 with maturity date up to 3 months account for 25%, up to 6 months account for 27%, up to 1 year for 19%, up to 2 years for 29%.

Pekao Faktoring Sp. z o.o. bonds
The total value of the company's liabilities under bonds with maturity date to 3 months amounted to PLN 4,119 million (principal value) as at the end of December 2025.

Subsequent events
Significant events that occurred after the date of preparation of the report and were not included in the Report are available at: Reports - Investor relations - Bank Pekao S.A.

12. Statement of Bank Polska Kasa Opieki Spółka Akcyjna on the application of corporate governance principles in 2025

Pursuant to § 72(7)(5)(a) and (b) of the Regulation of the Minister of Finance of 6 June 2025 *on current and periodic information provided by issuers of securities and conditions for recognising as equivalent information required by the laws of a non-member state*[3] (hereinafter the "Regulation of the Minister of Finance of 6 June 2025"), Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter the "Bank") declares that it adheres to the corporate governance principles listed below, which include principles adopted voluntarily and practices in the area of corporate governance that go beyond the requirements specified by national law.[4]

The corporate governance principles applied by the Bank, i.e., the system of regulations and procedures defining guidelines for the actions of the Bank's bodies, including towards external entities interested in its activities (stakeholders), are based on generally applicable legal provisions, particularly the Commercial Companies Code and the Banking Law Act, as well as regulations governing the capital market, and the principles outlined in the following documents: "Best Practice for WSE Listed Companies 2021," the Corporate Governance Principles for Supervised Institutions issued by the Financial Supervision Authority (KNF) on 22 July 2014 and the "Code of Banking Ethics of the Polish Bank Association."

Best Practice for WSE Listed Companies 2021

In 2025, the Bank applied the corporate governance principles contained in the "Best Practice for WSE Listed Companies 2021"[5] ("Best Practices 2021") adopted by the Supervisory Board of the Warsaw Stock Exchange (WSE) by resolution no. 13/1834/2021 of 29 March 2021, with the exception of the following:

1. detailed principles: 2.1.; 2.2. "Best Practices 2021" regarding diversity policy,
2. detailed principle 2.4. "Best Practices 2021" regarding the transparency of voting by the management board and the supervisory board.

In accordance with § 29(3) of the Rules of Procedure of the Warsaw Stock Exchange (WSE), by report no. 1/2021 of 4 August 2021, the Bank published an information report on the status of the application of the "Best Practices 2021," where it included explanations for the non-application of the aforementioned detailed principles.

By report no. 1/2022 of 15 June 2022, the Bank updated the information on the status of the application of the "Best Practices 2021," taking into account the resolutions no. 32 and 34 adopted by the Bank's Ordinary General Meeting.

By report no. 1/2025 of 13 March 2025, the Bank updated the information on the status of the application of the "Best Practices 2021" through an update of the comment regarding the non-application of principles 2.1, 2.2, and 2.4. The update of the comments to principles 2.1 and 2.2 was driven by personnel changes in the composition of the Bank's Management Board and Supervisory Board. Furthermore, in the Bank's opinion, the updated wording of the comment on the non-application of principle 2.4 adequately reflects the actual state of the Bank's compliance with this principle.

The Bank did not apply detailed principles 2.1. and 2.2. of the "Best Practices 2021," according to which, in terms of gender diversity, ensuring diversity in company bodies requires a minority share in a given body of no less than 30%.

The Bank has an approved "Gender Equality and diversity policy with regard to the Bank's employees, including Members of the Supervisory Board, Members of the Management Board and persons holding key functions at Bank Polska Kasa Opieki Spółka Akcyjna" (hereinafter the "Policy"), which defines the goals and criteria for diversity, including those specified in the Best Practices 2021. The Policy was developed with consideration for the requirements arising from generally applicable regulations addressed to entities in the banking sector, as well as recommendations from regulatory and supervisory bodies overseeing this sector, particularly the recommendations contained in the joint guidelines of the European Banking Authority (EBA) and the European Securities and Markets Authority (ESMA) on assessing the suitability of members of the management body and persons holding key functions. According to these guidelines, the expected minimum representation of the underrepresented gender in the statutory bodies of the Bank should be specified in the Policy implemented by the Bank. This principle should, in principle, apply to both the Supervisory Board and the Management Board of the Bank, which has been reflected in the aforementioned Policy implemented in the Bank. Additionally, the Ordinary General Meeting on 15 June 2022 clarified the Bank's commitment to achieving a 30% minimum target for the representation of each gender on the Supervisory Board. The Bank will strive to meet this target at the earliest possible time, but not earlier than the expiration of the current term of the Supervisory Board.

[3] Journal of Laws of 2025, item 755, as amended.

[4] § 72(7)(5)(a) and (b) of the Regulation of the Minister of Finance of 6 June 2025.

[5] The document is publicly available on the Warsaw Stock Exchange's website: https://www.gpw.pl/dobre-praktyki

The Bank also did not apply detailed principle 2.4. of the "Best Practices 2021," according to which voting by the supervisory board and management board should be transparent, unless otherwise specified by law. The Bank shares the view of the Corporate Governance Committee of the WSE that all resolutions, regardless of the voting procedure, are adopted by the Management Board and Supervisory Board in a thorough and transparent manner, i.e., after due discussion and the expression of opinions by all members of the body, which is reflected in the minutes of the statutory body meetings. Therefore, both the Rules of Procedure of the Supervisory Board and the Rules of Procedure of the Management Board of the Bank generally provide for open voting, with only exceptions allowing for secret voting in cases specified by law or in other indicated situations:

1. The Rules of Procedure of the Supervisory Board specify the obligation of the Chairman to order a secret vote only in one case, namely at the request of at least one member of the Supervisory Board, as an exception to the rule of open voting (§ 11(8) of the Rules of Procedure). The other provisions of the Rules of Procedure concerning secret voting have already been repealed or amended by the Supervisory Board.
2. The Rules of Procedure of the Management Board of the Bank stipulate that resolutions are adopted through open voting. As an exception to this rule, the Rules of Procedure specify that only in situations defined by law or in other justified cases, the President of the Management Board may order a secret vote (§ 8(2) of the Rules of Procedure).

Due to the specific nature of the banking sector, the Bank believes that it is not possible to explicitly enumerate in legal provisions all situations where secret voting would be the optimal solution from the perspective of the Bank's corporate governance. Therefore, the Bank does not entirely exclude the possibility of ordering a secret vote in cases other than those specified by law. The Bank has limited this possibility to the aforementioned cases, considering this approach to be an optimal compromise between the call for full transparency in the Bank's decision-making process and the necessity to provide the members of the Management Board and the Supervisory Board with the flexibility to adapt their actions to exceptional circumstances.

In 2025, there were two incidental breaches of the principles contained in the "Best Practices 2021":

1. By report no. 2/2025, the Bank informed about an incidental breach of principle 4.9.1 of the "Best Practices 2021,"
2. By report no. 3/2025, the Bank informed about an incidental breach of principle 4.8 of the "Best Practices 2021."

The breach of the aforementioned principles resulted from the shareholders of the Bank submitting their candidates for members of the Bank's Supervisory Board and the draft resolution for the Ordinary General Meeting too late. Reports regarding the aforementioned incidental breaches have been published and are available on the Bank's website[6].

Corporate Governance Principles for Supervised Institutions

In 2025, the Bank applied the Corporate Governance Principles for Supervised Institutions issued by the Polish Financial Supervision Authority (KNF) on 22 July 2014[7] (hereinafter the "Principles"), with the following exceptions:

1. the principles specified in § 54 and § 56 of Chapter 9 of the Principles do not apply to the Bank, as the Bank does not engage in activities in this area,
2. the principles specified in § 49(4) and § 52(2) of Chapter 8 of the Principles do not apply to the Bank, as the Bank has an internal audit unit and a compliance unit,
3. the principle specified in § 21(2) of Chapter 4 of the Principles was partially applied by the Bank.

In relation to the principles specified in Chapter 9 of the Principles, in 2025, the Bank began providing portfolio management services, which include one or more financial instruments. As a general rule, the Bank applies Chapter 9 of the Principles. However, the current Rules for the provision of portfolio management services only provide for the management of investment fund units, which, according to the Act on Trading in Financial Instruments, are financial instruments that are not classified as securities. Consequently, the principles specified in § 54 and § 56 of Chapter 9 of the Principles do not currently apply to the Bank.

The principle specified in § 21(2) of the Principles, concerning the composition of the supervisory body, in relation to the Chairman of the Supervisory Board, was partially applied by the Bank. The selection of the Chairman of the Supervisory Board was based on criteria such as the knowledge and experience possessed, including in managing the work of a team, as well as skills that confirm the competence necessary for performing supervisory duties properly. In light of the above, the criterion of independence was waived.

[6] https://www.pekao.com.pl/relacje-inwestorskie/raporty-i-sprawozdania/raporty.html?year=2025&category=ebi
[7] The document is publicly available on the Polish Financial Supervision Authority (KNF) website: https://www.knf.gov.pl/dla_rynku/regulacje_i_praktyka/zasady_ladu_korporacyjnego

Ethical Principles Applicable to the Bank
Code of Banking Ethics

In 2025, the Bank applied the corporate governance principles contained in the Code of Banking Ethics (Principles of Good Banking Practice) of the Polish Bank Association.[8]

The principles outlined in the Code of Banking Ethics apply to banks, employees, individuals or entities through which banks carry out banking activities. They serve as a guide for conducting business in an ethical manner and in accordance with good banking practices, and their adherence is an essential element in building trust in the banking sector and its reputation.

Code of Conduct of the Pekao Group

The Bank has adopted the Code of Conduct of the Pekao Group[9] (hereinafter the "Code"), which is a document containing the key values and principles that apply in all areas of the Bank's operations, as well as its organizational culture and system of values. The Code also represents a commitment to act in accordance with the highest standards in relations with colleagues, partners, clients, and the broader environment. The Bank promotes initiative, collaboration beyond structures, and the courage to make responsible decisions – always with respect for ethics, integrity, and mutual respect. The principles of the Code include references to the values adopted by the Bank and highlight their role in shaping the organizational culture. The Code covers, among others, the following areas:

1. emphasis on the role of adhering to corporate governance principles as a key element of sustainable business operations,
2. environmental, social, and governance (ESG) aspects as important pillars of the Bank's strategy,
3. the Bank's management of ESG risks, including building a culture of ESG risk,
4. customer-centric culture,
5. ethical use of technology and innovation, including AI,
6. management of conflicts of interest,
7. anti-corruption measures,
8. reporting of irregularities,
9. ensuring transparent and ethical business relationships, and
10. the use of clear language in the Bank's daily operations.

The Bank ensures that its actions comply with generally applicable legal regulations, the Bank's Articles of Association, internal regulations, market standards, and ethical norms.

In accordance with § 72(7)(5)(c) – (m) of the aforementioned Regulation of the Minister of Finance of 6 June 2025, the Bank presents the following information:

1. **Description of the main features of the internal control and risk management systems applied by the Bank in relation to the process of preparing financial statements and consolidated financial statements** [10]

The Management Board of the Bank is responsible for developing and implementing an independent, adequate, and effective Internal Control System, one of the objectives of which is to ensure the reliability of financial reporting.

As part of the Internal Control System, the Bank distinguishes:

1) the control function,
2) an independent compliance unit, i.e. the Compliance Department, tasked with identifying, assessing, controlling, and monitoring the risk of non-compliance of the Bank's activities with legal regulations, internal regulations, and market standards, and providing reports in this regard,
3) an independent internal audit unit, i.e. the Internal Audit Department, tasked with examining and assessing, in an independent and objective manner, the adequacy and effectiveness of the risk management system and the Internal Control System, excluding its own activities within these systems.

The Supervisory Board oversees the implementation and functioning of an adequate and effective Internal Control System. The Supervisory Board conducts an annual assessment of the adequacy and effectiveness of the Internal Control System, including an annual evaluation of the adequacy and effectiveness of the control function, the compliance unit, and the internal audit unit.

[8] The document is publicly available on the website of the Polish Bank Association: https://zbp.pl/Dla-Bankow/Prawo-i-legislacja/Komisja-Etyki-Bankowej
[9] https://www.pekao.com.pl/dam/jcr:b4ffe8b9-5464-4298-ae08-a5e6ecf54e61/25_12_Kodeks_postepowania_grupy_pekao_2025_A4.pdf
[10] § 72(7)(5)(c) of the Regulation of the Minister of Finance of 6 June 2025.

The Internal Control System in the process of preparing financial statements aims to ensure the accuracy, completeness, and proper recording of all economic transactions during a given period.

To ensure the financial reporting process, the Bank has established accounting principles (policy) compliant with the requirements of International Financial Reporting Standards and other applicable regulations, a chart of accounts, detailed internal instructions specifying the rules for recording various types of economic transactions, as well as reporting systems.

At the same time, the Bank continuously monitors changes in external regulations and conducts assessments of the potential impact of these changes on the accounting principles (policy) and reporting processes.

The IT systems ensure the acquisition of clear and centralized data, confirming the entries in the accounting books, as well as ensuring the continuity of entries, the transfer of turnovers and balances, and the preparation of financial statements.

The Bank has a formalized process for closing the books and preparing financial statements, which is carried out based on an established schedule that defines the actions and the units responsible for their execution.

The Financial Division is responsible for preparing financial statements, periodic financial and supervisory reporting, and ensuring management information. The division is overseen by the Vice President of the Management Board of the Bank, and the involved individuals have the appropriate knowledge and experience in the respective areas.

2. **Identification of shareholders holding, directly or indirectly, significant stakes in the Bank, along with the indication of the number of shares held by these entities, their percentage share in the share capital, the number of votes derived from them, and their percentage share in the total number of votes at the general meeting [11]**

The main shareholders of the Bank since 7 June 2017 are:

1) Powszechny Zakład Ubezpieczeń S.A., holding 52,494,007 (fifty-two million four hundred ninety-four thousand seven) shares of the Bank, representing approximately 20% of the Bank's share capital and entitling the holder to 52,494,007 (fifty-two million four hundred ninety-four thousand seven) votes, representing approximately 20% of the total number of votes; and
2) Polski Fundusz Rozwoju S.A., holding 33,596,166 (thirty-three million five hundred ninety-six thousand one hundred sixty-six) shares of the Bank, representing approximately 12.8% of the Bank's share capital and entitling the holder to 33,596,166 (thirty-three million five hundred ninety-six thousand one hundred sixty-six) votes, representing approximately 12.8% of the total number of votes.

Shareholders of the Bank holding, directly or indirectly through subsidiaries, at least 5% of the total number of votes at the Bank's General Meeting:

NAME OF SHAREHOLDER	NUMBER OF SHARES AND VOTES AT THE GENERAL MEETING	SHARE IN THE SHARE CAPITAL AND TOTAL NUMBER OF VOTES AT THE GENERAL MEETING	NUMBER OF SHARES AND VOTES AT THE GENERAL MEETING	SHARE IN THE SHARE CAPITAL AND TOTAL NUMBER OF VOTES AT THE GENERAL MEETING
	AS OF 31 DECEMBER 2025		AS OF 31 December 2024	
Powszechny Zakład Ubezpieczeń S.A.	52,494,007	20.00%	52,494,007	20.00%
Polski Fundusz Rozwoju S.A.	33,596,166	12.80%	33,596,166	12.80%
Nationale-Nederlanden Otwarty Fundusz Emerytalny	14,701,415	5.60%	16,834,767	6.41%
Allianz Polska Otwarty Fundusz Emerytalny	13,935,661	5.31%	14,140,661	5.39%
Other shareholders (below 5%)	147,742,785	56.29%	145,404,433	55.40%
Total	**262,470,034**	**100.00%**	**262,470,034**	**100.00%**

3. **Indication of holders of any securities that grant special control rights, along with a description of those rights[12]**

According to the Bank's Articles of Association, all existing shares of the Bank are ordinary bearer shares. There is no differentiation of shares in terms of the rights associated with them. There are no special privileges or restrictions associated with the existing shares. The rights and obligations associated with the Bank's shares result from generally applicable laws, particularly the provisions of the Commercial Companies Code.

The securities issued by the Bank do not grant their holders any special control rights.

11 § 72(7)(5)(d) of the Regulation of the Minister of Finance of 6 June 2025.
12 § 72(7)(5)(e) of the Regulation of the Minister of Finance of 6 Junee 2025.

4. Indication of any restrictions regarding the exercise of voting rights, such as limitations on the exercise of voting rights by holders of a specific part or number of votes, time restrictions regarding the exercise of voting rights, or provisions stating that the capital rights associated with the securities are separate from the ownership of the securities[13]

The Bank's Articles of Association do not foresee any restrictions on the exercise of voting rights from the Bank's shares (generally applicable laws may, in certain circumstances, limit the exercise of a shareholder's voting rights).

5. Indication of any restrictions concerning the transfer of ownership rights of the Bank's securities [14]

The Bank's Articles of Association do not contain any restrictions on the transfer of ownership rights of the Bank's securities. (generally applicable laws may, in certain circumstances, impose restrictions on the transfer of ownership of the Bank's securities).

6. Description of the rules regarding the appointment and dismissal of management members, as well as their powers, particularly the authority to make decisions regarding the issuance or redemption of shares [15]

According to the Articles of Association, the Management Board of the Bank consists of 5 to 9 members. Vice Presidents and Members of the Bank's Management Board are appointed and dismissed by the Supervisory Board, taking into account the assessment of suitability requirements. Members of the Management Board are appointed for a joint term of office, lasting three full financial years. Members of the Management Board are appointed after a qualification procedure, aimed at verifying and assessing the qualifications of candidates and selecting the best candidate.

The Management Board of the Bank consists of: the President of the Management Board, the Vice Presidents of the Management Board, and the Members of the Management Board. Vice Presidents and Members of the Management Board are appointed and dismissed upon the request of the Supervisory Board. The appointment of the President of the Management Board and the Member of the Management Board responsible for managing significant risks in the Bank's operations, or the assignment of this function to an appointed member of the Management Board, takes place with the consent of the Polish Financial Supervisory Authority (KNF). The request for consent is submitted by the Supervisory Board.

At least half of the members of the Bank's Management Board, including the President of the Management Board, should have a good knowledge of the banking market in Poland, by meeting the following criteria:

1) having professional experience in the Polish market, appropriate for the managerial position held in the Bank,
2) having a permanent place of residence in Poland,
3) proficiency in the Polish language.

The Management Board of the Bank manages the affairs of the Bank and represents the Bank. It is the duty of each member of the Bank's Management Board to take actions aimed at promoting the interests of the Bank. Members of the Bank's Management Board must not undertake actions or make decisions that could result in a conflict of interest, be contrary to the interests of the Bank, or be incompatible with their official duties. A member of the Bank's Management Board is required to inform the Board of any situation in which a conflict of interest could arise or has arisen, and refrain from speaking in discussions or voting on resolutions concerning the matter in which the conflict of interest exists.

Members of the Bank's Management Board are entitled to the powers granted by generally applicable law.

The Bank's Articles of Association do not foresee that the Management Board or its individual members have the right to make decisions regarding the issuance or redemption of shares.

7. Description of the rules for amending the Bank's Articles of Association[16]

Amendment of the Bank's Articles of Association requires a resolution to be adopted by the Bank's General Meeting and the registration of the adopted amendment in the National Court Register. The Rules of Procedure for the General Meetings of the Bank[17] specify the detailed rules for conducting meetings and adopting resolutions. Resolutions of the Bank's General Meeting regarding amendments to the Articles of Association are adopted by a three-quarter majority of votes. Furthermore, pursuant to Article 34(2) of the Banking Law, an amendment to the Bank's Articles of Association requires the approval of the Polish Financial Supervision Authority.

[13] § 72(7)(5)(f) of the Regulation of the Minister of Finance of 6 June 2025.
[14] § 72(7)(5)(g) of the Regulation of the Minister of Finance of 6 June 2025.
[15] § 72(7)(5)(h) of the Regulation of the Minister of Finance of 6 June 2025.
[16] § 72(7)(5)(i) of the Regulation of the Minister of Finance of 6 June 2025.
[17] Introduced by General Meeting Resolution No. 19 of 8 April 2003, as amended.

8. The way the General Meeting operates and its principal powers, as well as a description of the shareholders' rights and how they are exercised, particularly the rules arising from the rules of procedure of the General Meeting, if such rules have been adopted, unless this information is directly provided by the law[18]

The Bank's General Meeting operates based on the Rules of Procedure for General Meetings of the Bank, introduced by Resolution No. 19 on 8 April 2003, amended by Resolution No. 41 on 5 May 2009, Resolution No. 41 on 1 June 2012, and Resolution No. 42 on 16 June 2016. The Rules of Procedure for General Meetings of the Bank specify the detailed rules for conducting meetings and adopting resolutions. The Rules of Procedure for General Meetings of the Bank are available on the Bank's website.[19]

The competences of the Bank's General Meeting, besides other matters listed in the law, particularly in the Commercial Companies Code, the Banking Law, recommendations from supervisory authorities, and the Bank's Articles of Association, include:

1) reviewing and approving the Bank's activity report and financial statements for the previous financial year,
2) adopting a resolution on the allocation of profit or covering the loss,
3) reviewing and approving the report on the activities of the Supervisory Board,
4) granting discharge to the members of the Supervisory Board and the Management Board for the execution of their duties,
5) reviewing and approving the activity report and financial statements of the Bank's Capital Group,
6) determining the dividend date and the dividend payment date,
7) sale and lease of the business or its organized part and establishing limited property rights on them,
8) amending the Bank's Articles of Association and determining its consolidated text,
9) increasing or decreasing the Bank's share capital,
10) issuing convertible bonds or bonds with pre-emptive rights to subscribe for shares and issuing subscription warrants,
11) redemption of shares and determining the conditions of such redemption,
12) merger, division or liquidation of the Bank,
13) creation and dissolution of special funds,
14) appointment and dismissal of members of the Supervisory Board, including the assessment of their suitability,
15) establishing remuneration policies for members of the Supervisory Board,
16) concluding an agreement with a subsidiary company that provides for the management of the subsidiary or the transfer of profit from such a company,
17) other matters within the scope of the Bank's activities presented for consideration at the General Meeting.

The General Meeting of the Bank is convened by a notice published on the Bank's website and in a manner defined for the transmission of current information in accordance with regulations on public offerings and conditions for the introduction of financial instruments into organized trading systems, and regarding public companies. Notices are made at least twenty-six days before the General Meeting of the Bank.

The Ordinary General Meeting of the Bank should be held once a year, no later than six months after the end of each financial year. When setting the date for the Bank's General Meeting, the Management Board of the Bank ensures that the possibility of participation in the General Meeting is made available to the widest possible circle of shareholders.

In 2025, the Bank's General Meeting of Shareholders was held on 24 April 2025. Additionally, in 2025, three Extraordinary General Meetings were held: on 6 March 2025, 3 September 2025, and 6 November 2025.

The Articles of Association allow participation in the General Meeting using electronic communication means if the Management Board of the Bank decides to allow it. The Management Board makes the decision referred to in the preceding sentence if the Bank meets the necessary technical conditions required for participation in the General Meeting using electronic communication, which include in particular:

1) real-time transmission of the General Meeting proceedings,
2) real-time two-way communication, through which shareholders can express their opinions during the General Meeting while being in a location other than the meeting venue,
3) exercising the voting rights personally or by proxy before or during the General Meeting.

18 § 72(7)(5)(j) of the Regulation of the Minister of Finance of 6 June 2025.
19 https://www.pekao.com.pl/o-banku/lad-korporacyjny.html

According to the Bank's Articles of Association, in each case of convening the General Meeting, the Management Board specifies whether participation in the General Meeting via electronic communication is possible and what requirements and restrictions for such participation are necessary to identify shareholders and ensure the security of electronic communication. Detailed conditions for participation in the General Meeting using electronic communication are specified in the regulations adopted by the General Meeting, the notice of convening the General Meeting, and the Regulations for Participation in the General Meeting of the company under the name Bank Polska Kasa Opieki Spółka Akcyjna with its registered office in Warsaw, using electronic communication, adopted by Resolution No. 94/21 of the Bank's Supervisory Board on 5 May 2021 regarding the adoption of the Regulations for Participation in the General Meeting of the Company using electronic communication.

The Supervisory Board of the Bank may convene the Ordinary General Meeting of the Bank if the Management Board fails to do so within the period specified in the Articles of Association, and may also convene an Extraordinary General Meeting of the Bank if it deems it appropriate.

The full documentation to be presented to the Bank's General Meeting, along with draft resolutions and information regarding the General Meeting, is made available to those entitled to participate in the General Meeting via the Bank's website and at the location specified in the notice convening the General Meeting, published in accordance with Article 402^2 of the Commercial Companies Code.

Copies of the Management Board's report on the Bank's activities and the financial statements, along with a copy of the Supervisory Board's report and the auditor's opinion, are provided to shareholders upon request, no later than 15 days before the Bank's General Meeting.

The main rights of the Bank’s shareholders are as follows:

1) shareholders representing at least half of the share capital or at least half of the total votes in the company may convene an Extraordinary General Meeting of the Bank. In such case, the shareholders appoint the chairperson of the meeting,
2) shareholders representing at least 1/20 of the share capital may request the inclusion of specific matters in the agenda of the upcoming General Meeting of the Bank. The request to include specific matters in the agenda should include a justification or a draft resolution concerning the proposed agenda item and should be submitted to the Bank’s Management Board no later than twenty one days before the scheduled date of the General Meeting. This request may also be submitted electronically. The Management Board is obliged to immediately, but no later than 18 days before the scheduled date of the General Meeting, announce changes to the agenda introduced at the shareholders' request. The announcement is made in the manner prescribed for convening the General Meeting of the Bank,
3) shareholders representing at least 1/20 of the share capital may, before the date of the Bank’s General Meeting, submit to the Bank, in writing or via electronic communication means, draft resolutions concerning matters included in the agenda of the General Meeting or matters to be included in the agenda. The Bank immediately announces the draft resolutions on the Bank’s website.
4) each shareholder may propose draft resolutions on matters included in the agenda during the General Meeting of the Bank,
5) shareholders may participate in the General Meeting of the Bank either in person or by proxy,
6) at the request of shareholders representing one-tenth of the share capital represented at the General Meeting of the Bank, the attendance list must be verified by a committee selected for this purpose, consisting of at least three members. The applicants have the right to choose one member of this committee,
7) The General Meeting of the Bank cannot adopt a resolution to remove a matter from the agenda or to cease the consideration of a matter placed on the agenda at the request of shareholders without their consent,
8) breaks during the proceedings of the General Meeting of the Bank cannot be aimed at hindering shareholders from exercising their rights,
9) each participant in the Bank's General Meeting has the right to propose one or more candidates for the Bank's Supervisory Board members,
10) at the request of shareholders representing at least one-fifth of the share capital, the election of the Supervisory Board should be carried out by voting in separate groups. The request in this regard should be submitted to the Management Board in writing in a timely manner, allowing it to be included in the agenda of the Bank's General Meeting,
11) shareholders have the right to review the minutes book and request certified copies of the resolutions issued by the Management Board,
12) it is the Chairperson of the General Meeting’s duty to ensure the protection of the rights and interests of all shareholders, particularly ensuring that the rights of minority shareholders are respected,
13) shareholders who oppose a resolution are provided with an opportunity to briefly justify their opposition.

All matters presented at the Bank's General Meeting have an opinion from the Supervisory Board According to § 9 of the Bank's Articles of Association, all matters presented at the Bank's General Meeting must be presented to the Supervisory Board for consideration in advance.

Members of the Bank's Management Board and Supervisory Board should participate in the General Meeting in a composition that allows them to provide substantive answers to questions raised during the General Meeting. At the General Meeting of the Bank, where financial matters are discussed, particularly at the Ordinary General Meeting, an auditor should be present.

The Management Board of the Bank, as the body responsible for providing legal services for the General Meetings of the Bank, makes every effort to ensure that the resolutions are formulated clearly and transparently.

The Rules of Procedure for the General Meeting of the Bank include provisions (§ 13(10)–(17)) concerning the election of the Supervisory Board by separate group voting.

Any amendments to the Rules of Procedure for the General Meeting of the Bank come into force starting from the next General Meeting of the Bank.

The duties and powers of the Chairperson of the General Meeting include, in particular, ensuring the efficient conduct of the meeting in accordance with the established agenda, safeguarding the rights and interests of all shareholders, and, in particular, preventing the abuse of powers by participants of the General Meeting and ensuring that the rights of minority shareholders are respected.

Members of the Supervisory Board and the Management Board, as well as the Bank's auditor, within the scope of their competences and to the extent necessary for resolving the matters discussed at the meeting, provide explanations and information to the participants of the Bank's General Meeting.

Voting on procedural matters during the General Meeting can only concern issues related to the conduct of the meeting. Resolutions that could affect the exercise of shareholders' rights are not subject to voting in this manner.

The removal of a matter from the agenda or the discontinuation of the consideration of a matter placed on the agenda at the justified request of shareholders requires the adoption of a resolution by the Bank's General Meeting with a three-quarters majority, after prior consent has been given by all shareholders present who made such a request.

9. Description of the functioning of the management, supervisory, or administrative bodies of the Bank, as well as their committees, along with an indication of the composition of these bodies and any changes that occurred within them during the last financial year[20]

Management Board of the Bank

The Management Board of the Bank operates based on the Bank's Articles of Association and the Rules of Procedure of the Management Board of Bank Polska Kasa Opieki Spółka Akcyjna, adopted by Resolution No. 64/II/19 of 25 February 2019, amended by Resolution No. 92/III/20 of 12 March 2020, Resolution No. 153/IV/20 of 17 April 2020, Resolution No. 328/VII/20 of 24 July 2020, Resolution No. 3/I/22 of 5 January 2022, Resolution No. 31/I/23 of 23 January 2023, and Resolution No. 267/VI/24 of 18 June 2024. The Rules of Procedure specify, in particular, the matters that require collective consideration by the Management Board and the rules for conducting Management Board meetings, including meetings held using remote communication means, as well as the rules for adopting resolutions in writing or through the use of remote communication means. The Rules of Procedure of the Management Board of the Bank are available on the Bank's website[21]. The Management Board of the Bank assesses that the Rules of Procedure of the Management Board of Bank Polska Kasa Opieki Spółka Akcyjna, as the regulation governing the operation of the Management Board, are adequate and in compliance with legal provisions and supervisory authority requirements.

In accordance with the Bank's Articles of Association, the Management Board manages the Bank's affairs and represents the Bank. The scope of the Management Board's responsibilities includes all matters that are not, under applicable law or the Articles of Association, reserved to the competence of other statutory bodies of the Bank.

Pursuant to the provisions of the Rules of Procedure of the Management Board, the Management Board develops the Bank's development strategy. In addition, the Management Board prepares multi-year development programs for the Bank and the Bank's annual financial plans, which are reviewed by the Supervisory Board. The Management Board of the Bank ensures the transparency and effectiveness of the risk management system and conducts the Bank's affairs in compliance with applicable laws and Best Practices. The management of the Bank is based on professionalism and credibility, while relations with clients are characterized by diligence and integrity, as well as conduct in accordance with applicable law, including regulations governing anti-money laundering and counter-terrorist financing. The Management Board of the Bank establishes the principles and methods for the implementation of, *inter alia*: (i) the investment policy, (ii) the asset and liability management policy, (iii) the credit policy, (iv) the human resources, remuneration and social policy of the Bank, and (v) the interest rate policy.

20 § 72(7)(5)(k) and (l) of the Regulation of the Minister of Finance of 6 June 2025.
21 https://www.pekao.com.pl/o-banku/lad-korporacyjny.html

In pursuing the principle of efficient and prudent management of the Bank, the Management Board is responsible for initiating and implementing programs aimed at increasing the value of the Bank, generating a return on investment for shareholders, and protecting the long-term interests of employees. When making decisions, the Management Board makes every effort to ensure, to the fullest extent possible, the realization of the interests of shareholders, creditors, employees, as well as other entities and persons cooperating with the Bank in the course of its business activities. In the opinion of the Management Board of the Bank, the actions undertaken by the Management Board in 2025 in order to perform the tasks entrusted to it were effective.

Members of the Management Board of the Bank are appointed by the Supervisory Board for a joint term of office lasting three full financial years. The Management Board of the Bank ensures the transparency and effectiveness of the management system and conducts the Bank's affairs in compliance with applicable laws and the "Best Practices."

Composition of the Management Board
From 1 January to 31 August 2025, the Management Board of the Bank was composed as follows:

1) Mr Cezary Stypułkowski – President of the Management Board of the Bank,
2) Ms Dagmara Wojnar – Vice President of the Management Board of the Bank,
3) Mr Marcin Gadomski – Vice President of the Management Board of the Bank,
4) Mr Robert Sochacki – Vice President of the Management Board of the Bank,
5) Mr Błażej Szczecki – Vice President of the Management Board of the Bank,
6) Mr Marcin Zygmanowski – Vice President of the Management Board of the Bank.

dr Cezary Stypułkowski **President of the Management Board of the Bank.**

In the years 2010–2024, he served as President of the Management Board of mBank S.A. He holds the position of Vice-Chairman of the Council of the Polish Bank Association and serves as Chairman of the Large Banks Section of the Polish Bank Association. Since 2022, he has been a member of Mastercard's International Advisory Board. In October 2024, he joined the Board of the Institute of International Finance (IIF) in Washington, D.C., the leading global financial industry organization, bringing together nearly 500 of the largest financial institutions from over 60 countries. Since 2012, he has been Co-Chair of the Emerging Markets Advisory Council at the IIF.

In the years 2006–2010, he worked at J.P. Morgan in London, where from 2007 he served as Managing Director of J.P. Morgan's investment banking business for Central and Eastern Europe.

Between 2003 and 2006, he served as President of the Management Board of the PZU Group, and in the years 1991–2003 he was President of the Management Board of Bank Handlowy S.A. in Warsaw.

He has been a member of the International Advisory Board of Deutsche Bank, the European Advisory Board of J.P. Morgan, the International Advisory Board of INSEAD, and a member of the Geneva Association.

He holds a PhD in Law from the University of Warsaw. In the late 1980s, as a Fulbright Scholar, he studied at Columbia University Business School in New York.

Cezary Stypułkowski meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

Dagmara Wojnar **Vice President of the Management Board of the Bank.**

She is a graduate of Banking at the Cracow University of Economics and of the Multinational MBA program at ESADE in Spain, and holds qualifications as a statutory auditor and FCCA. She has completed a number of executive development programs at leading business schools, including INSEAD and London Business School.

She has over 20 years of experience in the financial sector, including more than 10 years in bank financial management. She has worked for the largest banking institutions in Poland, delivering transactions of key importance to the financial sector.

In the years 2022–2024, as an Associate Partner at KPMG, she was responsible for advisory services for Chief Financial Officers. Between 2010 and 2022, she managed the Controlling/MIS area at Santander Bank Polska, where she implemented numerous key projects related to financial management. She has served as a member of decision-making committees within the bank, as well as a member of supervisory boards. In the years 2000–2010, while working at KPMG, she participated in projects for the financial sector involving statutory audits of financial statements, fair value valuation of loan portfolios, due diligence, and advisory services related to mergers and acquisitions transactions.

She is an advocate of partnership between finance and business and a leader focused on building loyal and engaged teams.

Dagmara Wojnar meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

Marcin Gadomski

Vice President of the Management Board of the Bank responsible for oversight of risk management material to the Bank’s operations.

He holds a Master’s degree from the SGH Warsaw School of Economics in Finance and Banking and completed doctoral studies at the SGH Warsaw School of Economics. He was also a scholarship holder at the University of Kiel (Germany). He has passed a number of professional certification examinations, including: Financial Risk Manager (FRM), Association of Chartered Certified Accountants (ACCA), Project Management Professional (PMP), and Certified Banking and Credit Analyst (CBCA). He participated in the Leadership Development Program run by The John Maxwell Team, as well as in the Deloitte Leadership Program.

Marcin Gadomski began his professional career in 2002 at Ernst & Young (currently EY), where he delivered projects in the areas of risk management, finance and internal audit for financial institutions and non-financial enterprises. He subsequently continued his career at Deloitte Advisory, first in the years 2008–2012 as a Senior Manager, and later in the years 2016–2018 as a Director. As part of Deloitte Advisory, he delivered solutions for the largest financial institutions in Poland and abroad, including in the areas of credit policy, risk models, streamlining of credit processes for retail and corporate clients, market and liquidity risk management, accounting principles and regulatory requirements, and due diligence reviews for acquisition purposes.

In the years 2012–2016, he served as Director of Retail Banking Credit Risk at Bank Millennium, where he was responsible for credit policy and credit scoring models for business lines such as unsecured consumer loans, mortgage loans and loans to small businesses.

From August 2018 to November 2019, he served as a Member of the Management Board of Pekao Bank Hipoteczny S.A. Between 29 November 2019 and 21 April 2020, he served as Vice President of the Management Board of Bank Pekao S.A., where he was responsible for the Risk Management Division, and subsequently served as Director for Credit Risk. As of 1 July 2020, he was reappointed to the Management Board of Bank Pekao S.A., where he is responsible for the Risk Management Division. On 15 February 2021, he obtained the approval of the Polish Financial Supervision Authority (KNF) to perform the function of a Management Board member responsible for oversight of risk management material to the bank’s operations.

In addition, Mr Marcin Gadomski serves on supervisory boards as Deputy Chairman of the Supervisory Board of Pekao Leasing Sp. z o.o. and Pekao Investment Banking S.A., and as Chairman of the Supervisory Board of Pekao Bank Hipoteczny S.A. He is also a member of the Supervisory Board of Biuro Informacji Kredytowej S.A. and System Ochrony Banków Komercyjnych S.A.

Marcin Gadomski meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

Robert Sochacki

Vice President of the Management Board of the Bank.

He is a graduate of the Warsaw University of Technology and the Canadian Executive MBA program. He is a Chartered Financial Analyst (CFA). He has also completed the Advanced Management Program at IESE Business School.

He has been associated with the financial market for nearly 30 years.

From April 2015 to May 2024, he served as President of the Management Board of Beta Securities Poland S.A., a company supporting the development of ETF funds in Poland. Previously, in the period from July 2011 to April 2014, he was a Member of the Management Board of Opera TFI S.A., where he was responsible for the private equity investment area, as well as a Member of the Management Board of Opera Dom Maklerski. From June 2007 to June 2011, he served as Vice President of the Management Board of Bank Gospodarstwa Krajowego, where he was responsible for oversight of financial markets, investment project financing and sales. In addition, he worked at PKO Bank Polski S.A. as Deputy Director of the Treasury Department, and at Credit Lyonnais Bank Polska, where he headed the sales team in the Treasury Department.

He has extensive experience in supervisory boards of capital companies. He has served on the supervisory boards of the following companies: AgioFunds TFI S.A. (member of the Risk Committee), PEKAES S.A. (member of the Audit Committee), SEKO S.A. (member of the Audit Committee), Krajowy Fundusz Kapitałowy S.A., and KUKE S.A.

He was a lecturer at the Warsaw Institute of Banking. He has completed numerous training programs and courses in the fields of banking, management and finance.

Robert Sochacki meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

dr Błażej Szczecki

Vice President of the Management Board of the Bank.

Since 2004, he has been professionally associated with the Pekao S.A. Group. In the years 2018–2021, he served as Plenipotentiary of the Management Board for Transformation, and subsequently also as Plenipotentiary of the Management Board for Strategy, where he was responsible, *inter alia*, for oversight of digital and operational transformation and for leading the work on the Bank's Strategy. In the years 2017–2018, he headed the Transformation and Services Division, managing, among others, IT and Operations. Between 2010 and 2017, as a Member of the Management Board of Pekao Leasing, he was responsible, *inter alia*, for IT, operations, insurance and customer service.

From 2004 to 2010, he held managerial positions in the Corporate Banking Division, including participation in the work preparing the merger of Bank Pekao with Bank BPH. Before joining Pekao, he worked at McKinsey & Company in Frankfurt am Main, Germany, was a researcher at universities in Frankfurt (Oder) and Giessen, Germany, and also gained professional experience at Dresdner Bank.

Since 2017, he has served as Chairman of the Supervisory Board of Centrum Kart S.A. From 2017 to August 2020, he was a member of the Supervisory Board of Pekao Financial Services Sp. z o.o., serving as Deputy Chairman and Secretary of the Supervisory Board. He was reappointed to the Supervisory Board of Pekao Financial Services Sp. z o.o. in March 2021 and currently serves as Chairman of the Supervisory Board.

He holds a PhD in Economics and is a graduate of the Faculty of Economics at the European University Viadrina in Frankfurt (Oder), Germany. He has completed numerous domestic and international training programs, including Unifuture in cooperation with the Institute for Management Development (IMD) in Lausanne, Switzerland.

Błażej Szczecki meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

Marcin Zygmanowski

Vice President of the Management Board of the Bank.

He has been professionally associated with Accenture for nearly 30 years, where since 2005 he served as Managing Director.

From 2005 to 2013, he led the IT technology practice at Accenture in Poland.

In the years 2013–2015, he built the digital transformation practice for the banking sector in Poland, and since 2016, he has been the leader of the global practice specializing in digital banking startups.

Between 2017 and 2019, he managed a program that resulted in the establishment of a new digital bank in France, and until 2023, he was responsible for its operations, further development and business continuity. At the same time, he worked closely with leading banks in Poland, delivering projects in retail, corporate and investment banking.

He has led large-scale, multi-year transformation programs for clients in Poland and internationally, transforming local, regional and global organizations, leveraging both established and emerging technologies.

He has extensive international experience, having worked on major projects in financial institutions in the USA, Canada, the UK, France, Spain, Germany, the Czech Republic, Lithuania, Hungary, Turkey, the United Arab Emirates, Malaysia, and Singapore.

He graduated with honours from the Faculty of Electronics at the Warsaw University of Technology and completed postgraduate studies in IT at the Swiss Federal Institute of Technology (ETH) in Zurich. He has also completed numerous international training programs in complex program management, technology solutions development, cybersecurity, cloud computing, blockchain, Gen AI, and risk management.

Marcin Zygmanowski meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

On 29 April 2025, following the qualification procedure and suitability assessment, the Supervisory Board of the Bank appointed Mr Łukasz Januszewski to the Management Board of the Bank as Vice President for the current joint term, effective 1 September 2025.

According to the statement provided, Mr Michał Panowicz, from the date of assuming office, will not conduct any activity competitive to the Bank, in particular he will not hold the status of a partner in any civil, personal, or capital company competing with the Bank, nor serve as a member of the governing body of any legal entity competing with the Bank, nor conduct his own business activity competitive to the Bank. Mr Michał Panowicz is not entered in the Register of Insolvent Debtors, maintained pursuant to the Act of 20 August 1997 on the National Court Register.

On 29 April 2025, following the qualification procedure and suitability assessment, the Supervisory Board of the Bank appointed Mr Łukasz Januszewski to the Management Board of the Bank as Vice President for the current joint term, effective 1 September 2025.

According to the statement provided, Mr Łukasz Januszewski, from the date of assuming office, will not conduct any activity competitive to the Bank, in particular he will not hold the status of a partner in any civil, personal, or capital company competing with the Bank, nor serve as a member of the governing body of any legal entity competing with the Bank, nor conduct his own business activity competitive to the Bank. Mr Łukasz Januszewski is not entered in the Register of Insolvent Debtors, maintained pursuant to the Act of 20 August 1997 on the National Court Register.

Michał Panowicz

Vice President of the Management Board of the Bank.

An experienced manager, creator, and leader in the field of digital transformation. He consistently delivers financial results (P&L), budgets, operational metrics, talent development,

and comprehensive program execution in the areas of assets, liabilities, payments, insurance, and investment products, serving retail and SME segments, digital channels, technology, and marketing. He has built multi-disciplinary, agile teams of over 550 people, representing more than 40 nationalities and operating in over 20 countries, both in large companies and startups. Michał Panowicz has received 21 global awards for innovation for creating visions, implementing, and commercializing technology-based innovations.

He began his professional career at Boston Consulting Group in 1998. From 2006 to 2011, he worked for Microsoft, initially as Group Manager in the Global Corporate Strategy Department in Redmond, US, and later as Director of the Executive Office in the Pricing and Licensing Division. From 2011 to 2015, he worked at mBank as Managing Director of the New mBank Program and Managing Director for Products, Marketing, and Digital Channels, where he was responsible, among other things, for implementing Agile across the entire organization. From 2015 to 2016, he worked at Nordea Bank as Senior Managing Director and Head of Electronic Banking, managing a team of over 550 employees across six countries and responsible for product, IT, operations, design, CRM, and digital sales. He then served until 2018 as Vice President for Products and IT at Kreditech, the largest FinTech company in Germany. From 2018 to 2024, as Managing Director and Partner at Boston Consulting Group in London, he co-founded "InQbate," a BCG sub-brand acting as an accelerator for building digital solutions, and served as a member of the Global Retail and SME Committee in BCG's banking practice as Omnichannel Area Leader. He is also the author of numerous publications in this field. Michał Panowicz holds a Master's degree in Finance and Banking from the Warsaw School of Economics and an MBA from Harvard Business School.

Michał Panowicz meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

Łukasz Januszewski

Vice President of the Management Board of the Bank.

An experienced manager, active in the banking sector in Poland and Central and Eastern Europe for 27 years.

From 2018 to 2025, Mr Januszewski served as Member of the Management Board of Raiffeisen Bank International AG responsible for Corporate and Investment Banking. He has experience gained from serving as Chairman of the Supervisory Board of Raiffeisenbank a.s. in Prague, Raiffeisen Bank Stock Exchange JSC in Kyiv, and Raiffeisen Kapitalanlage GmbH in Vienna, as well as Member of the Supervisory Board of Raiffeisenbank S.A. in Bucharest and Raiffeisen Digital Bank AG in Vienna. From 2007 to 2018, he was Member of the Management Board of Raiffeisen Bank Polska S.A., responsible for financial markets and treasury operations, and earlier held various key positions, including Director of the Capital Markets Department (2003–2007).

He holds a Bachelor's degree in Economics from the SGH Warsaw School of Economics and a Master's degree from the Faculty of Management of the University of Warsaw.

Łukasz Januszewski meets the suitability requirements set out in Article 22aa of the Polish Banking Law Act.

Accordingly, from 1 September to 31 December 2025, the composition of the Management Board of the Bank was as follows:

1) Mr Cezary Stypułkowski – President of the Management Board of the Bank,
2) Ms Dagmara Wojnar – Vice President of the Management Board of the Bank
3) Mr Marcin Gadomski – Vice President of the Management Board of the Bank
4) Mr Robert Sochacki – Vice President of the Management Board of the Bank
5) Mr Błażej Szczecki – Vice President of the Management Board of the Bank
6) Mr Marcin Zygmanowski – Vice President of the Management Board of the Bank,
7) Mr Łukasz Januszewski – Vice President of the Management Board of the Bank,
8) Mr Michał Panowicz – Vice President of the Management Board of the Bank.

Division of competences

Members of the Bank's Management Board coordinate and supervise the Bank's operations in accordance with the division of competences adopted by the Management Board and approved by the Supervisory Board. As of 31 December 2025, the division of competences among the members of the Management Board was as follows:

1) President of the Management Board – Cezary Stypułkowski:
   a. convenes and chairs the meetings of the Management Board of the Bank, presents the position of the Management Board of the Bank towards the Bank's bodies and in external relations, particularly with state authorities,
   b. coordinates the work of the members of the Management Board of the Bank, issues orders in accordance with the internal regulations of the Bank,

   c. supervises the following areas of the Bank's activities: internal audit, compliance risk, human resources, customer experience organization and management, strategy and corporate affairs, including corporate communications and investor relations,
   d. has been designated as the Management Board Member responsible for implementing the obligations defined in the Anti-Money Laundering and Terrorist Financing Act.
2) Dagmara Wojnar, Vice President of the Management Board of the Bank, supervises the activities of the Financial Division and has been designated as the member of the Management Board to whom violations will be reported and who will be responsible for the ongoing operation of the violation reporting procedure (whistleblowing).
3) Marcin Gadomski, Vice President of the Management Board of the Bank, supervises the activities of the Risk Management Division, including ESG risk, and is responsible for overseeing the management of bancassurance risk.
4) Robert Sochacki, Vice President of the Management Board of the Bank, supervises the activities of the Corporate Banking, Markets, and Investment Banking Division.
5) Błażej Szczecki, Vice President of the Management Board of the Bank, supervises the activities of the Branch Distribution, Private Banking, and Operations Division.
6) Marcin Zygmanowski, Vice President of the Management Board of the Bank, supervises the activities of the Technology Transformation and Innovation Division, as well as coordinates actions aimed at appropriately managing the risk related to the security of the telecommunication environment.
7) Łukasz Januszewski, Vice President of the Management Board of the Bank, supervises the activities of the Corporate Banking Division.
8) Michał Panowicz, Vice President of the Management Board of the Bank, supervises the activities of the Integrated Channels, Products, and Retail Segments Division.

Supervisory Board

The Supervisory Board operates based on the Rules of Procedure of the Supervisory Board of Bank Polska Kasa Opieki Spółka Akcyjna, adopted by resolution no. 10/15 of the Supervisory Board of 6 February 2015, and subsequently amended by: resolution no. 9/18 of 13 March 2018, resolution no. 128/20 of 15 July 2020, resolution no. 157/20 of 3 November 2020, resolution no. 168/20 of 10 November 2020, resolution no. 108/21 of 8 July 2021, resolution no. 10/22 of 24 January 2022, resolution no. 116/23 of 18 October 2023, and resolution no. 5/25 of 31 January 2025. The Rules of Procedure of the Supervisory Board are available on the Bank's website.[22]

The role of the Supervisory Board is to exercise overall and ongoing supervision over the Bank's activities, including taking into account the Bank's role as the parent company with respect to its subsidiaries. In addition to the powers arising from legal regulations, the Supervisory Board has powers specified in the Bank's Articles of Association, including, in particular, the fact that the Supervisory Board reviews all matters submitted to the Bank's General Meeting.

The members of the Supervisory Board, in their conduct, act in the best interest of the Bank and undertake all actions aimed at ensuring the smooth functioning of the Supervisory Board. Furthermore, members of the Supervisory Board of the Bank may not undertake actions or make decisions that would result in a conflict of interest or would be contrary to the interests of the Bank. If a member of the Supervisory Board becomes aware of a conflict of interest or the possibility of such a conflict arising, they should inform the Supervisory Board and refrain from speaking during discussions or voting on any resolutions related to the matter in which the conflict of interest has arisen.

In accordance with applicable law, the Supervisory Board prepares and submits to the Bank's General Meeting an evaluation of the Management Board's report on the activities of the Bank and the activities of the Bank's Capital Group for the previous financial year, an evaluation of the Bank's financial statements and the consolidated financial statements of the Bank's Capital Group for the previous financial year, an evaluation of the Management Board's proposals regarding the distribution of profits or covering losses, as well as a report on the activities of the Bank's Supervisory Board. These evaluations are made available to shareholders before the Bank's General Meeting.

The Supervisory Board has established problem committees, each dealing with specific areas of the Bank's operations, including: Audit Committee, Nomination and Remuneration Committee and Risk Committee. The reports of the committees established by the Supervisory Board are stored at the Bank's headquarters. Annual reports of the committees are attached to the Supervisory Board's report and published in the same manner as the report.

In 2025, the Supervisory Board held 13 meetings.

[22] https://www.pekao.com.pl/o-banku/lad-korporacyjny.html

Composition of the Supervisory Board
From 1 January to 5 March 2025, the composition of the Supervisory Board was as follows:

1) Mr Artur Olech – Chairman of the Supervisory Board,
2) Mr Bartosz Grześkowiak – Deputy Chairman of the Supervisory Board,
3) Mr Artur Nowak-Far – Deputy Chairman of the Supervisory Board,
4) Mr Jacek Nieścior – Member of the Supervisory Board,
5) Mr Krzysztof Czeszejko-Sochacki – Member of the Supervisory Board,
6) Mr Radosław Niedzielski – Member of the Supervisory Board,
7) Mr Witold Walkowiak – Member of the Supervisory Board,
8) Ms Magdalena Dziewguć – Member of the Supervisory Board.

Artur Olech

Chairman of the Supervisory Board.
A manager with over 30 years of experience in the financial and insurance industries. Since 12 April 2024, he has served as the President of the Management Board of PZU S.A.

He is a graduate of the Faculty of Law and Administration at the University of Warsaw and the Faculty of Finance and Banking at the SGH Warsaw School of Economics. He also completed studies at the Wirtschaftsuniversität Wien. He has participated in numerous training programs for top executives, including those at Harvard Business School, Kellogg School of Management, and Chicago GSB (Booth School of Business).

He is a co-founder of fintech companies. An expert in business process management. A long-time President of the Management Board of financial institutions. Since May 2020, he has been a co-founder of Trasti – an insurtech and digital insurer created in a joint venture with Triglav DD and Swiss Re, where he also served as President of the Management Board. He has experience in the insurance market, both in the private and public sectors.

In 2014, he was invited by the Management Board of the Poczta Polska S.A. Group to cooperate in using his expertise to establish and lead Postal Insurance. In just 4 months after its founding and obtaining a license, the life insurance company Pocztowe Towarzystwo Ubezpieczeń na Życie S.A. began its operations. At the same time, his team reorganized the operations of the property insurance company – Pocztowe Towarzystwo Ubezpieczeń Wzajemnych, changing its structure and modernizing it into a multi-brand business model.

He was associated with the Generali Group for many years, progressing through various stages of his career and assuming different responsibilities, starting as a manager, then as the Director of a Department, Member of the Management Board, Vice President, and finally being offered the position of President of the Management Board of the Group in Poland in 2010. During this period, he participated in numerous specialized training programs and was the first Polish person to complete the Value of Knowledge program for top management within the international structures of the Generali Group. Under his leadership in Poland, the Polish Generali companies were twice awarded in 2012 and 2013 for their financial results and business growth. From 2010 to 2014, he served as the leader of a multinational, multicultural, and diversified Management Board of the Generali Group in Poland.

He has served on several supervisory boards of Polish financial institutions and pension funds, holding the position of independent member in public sector and listed companies. In 2017–2018, he was a Member of the Supervisory Board of Mabion S.A., an innovative drug manufacturer. In 2016, he joined the Supervisory Board of Ciech S.A. (currently Qemetica), where he still serves as Chairman of the Audit Committee.

In March 2023, he was invited to the Program Council of EKF Ubezpieczenia, a conference organized as part of the prestigious European Financial Congress. He is a member of the Jury of the Leaders of the Banking and Insurance World, which awards annual prizes for the best banks and insurance companies. Since May 2024, he has been a member of the Audit Committee of the Polish Chamber of Insurance. Since June 2024, he has been a member of the Supervisory Board of the Insurance Guarantee Fund.

Bartosz Grześkowiak	**Deputy Chairman of the Supervisory Board.** A manager with over 20 years of experience in the insurance industry. Since 12 April 2024, he has been a Member of the Management Board of PZU S.A. He is a graduate of the Poznań University of Life Sciences. In 2003, he completed a one-year postgraduate program in capital investments at the Poznań University of Business and Economics, Faculty of Finance and Banking. He also completed the AMP Advanced Management Program approved by IESE University of Navarra. He holds a broker's exam certificate. From the beginning of his career, Mr Grześkowiak has been associated with the insurance market in the corporate insurance segment. In 2005, he joined UNIQA Towarzystwo Ubezpieczeń S.A., where he held several managerial positions, ultimately becoming Director of the Sales Department (Broker Channel) in 2008. From 2011, he served as Managing Director at Towarzystwo Ubezpieczeń i Reasekuracji WARTA S.A., where he was responsible for managing the Corporate Insurance Department and actively participated in building and implementing the company's strategy. In 2018, he joined the MAK Group as Vice-President of the following companies: MAK Ubezpieczenia and STBU Brokerzy Ubezpieczeniowi. In May 2019, he became President of the Management Board of MAK International Sp. z o.o., and in November 2020, he was appointed Vice President of the Management Board of the reinsurance broker MAK Re. Since April 2024, he has been the Chairman of the Supervisory Board of TUW PZUW, and since May 2024, he has been a member of the Audit Committee of the Polish Chamber of Insurance.
Artur Nowak-Far	**Deputy Chairman of the Supervisory Board.** Full professor of legal sciences, Doctor of Economic Sciences, academic staff member at the SGH Warsaw School of Economics. A recognized expert in financial law, including European Union financial law. From 2013 to 2015, he served as Undersecretary of State at the Ministry of Foreign Affairs, responsible, among other things, for ensuring that legislation complied with EU law. From 2007 to 2013, he was a member of the Board of the Supreme Audit Office. Editor and author of articles and books, particularly in the fields of financial law and EU law, including “Prawo i ekonomii rynku wewnętrznego Unii Europejskiej” (Poltext Publishing House, Warsaw 2013), “Prawo Unii Europejskiej. Języki, struktury, działanie w praktyce” (C. H. Beck, Warsaw 2021), “European Economic and Monetary Union: A Legal Perspective on the EU Economic Governance Model Development” (Studium, Rome 2022), “Prawo Bankowe. Komentarz", edited by Agnieszka Mikos-Sitek and Piotr Zapadka (Wolters Kluwer, Warsaw 2023). He is an independent Member of the Supervisory Board.
Jacek Nieścior	**Member of the Supervisory Board.** He graduated in 1991 from the Faculty of Law at the University of Gdańsk. After completing his studies, he undertook legal counsel training at the Regional Chamber of Legal Advisers in Olsztyn and has been listed as a legal counsel since 1994. He has held managerial positions in the Supreme Audit Office, the Capital City of Warsaw Municipality Office, the Provincial Office in Warsaw, and the Marshal’s Office of the Mazovian Voivodeship. He has served on the Supervisory Boards of Grodziskie Zakłady Farmaceutyczne POLFA Sp. z o.o. in Grodzisk Mazowiecki, DIPSERVICE w Warsawie S.A., Stołeczne Przedsiębiorstwo Handlu Wewnętrznego Sp. z o.o., Huta Lucchini Warszawa Sp. z o.o., Pekao Investment Management S.A., and Grupa Azoty Zakłady Azotowe „Puławy” S.A. as Chairman of the Supervisory Board. Since 1998, he has continuously practiced as a legal counsel and currently runs his own law office, providing legal services to local government units and entrepreneurs. He is an independent Member of the Supervisory Board.

Krzysztof Czeszejko-Sochacki

Member of the Supervisory Board.
He graduated from the Faculty of Law and Administration at the University of Warsaw. After passing the judicial exam (1980) and the bar exam (1983), he has practiced as a lawyer, initially in a law firm and, since 1992, in his own law office in Warsaw – Kancelaria Adwokacka Adwokat Krzysztof Czeszejko-Sochacki, specializing in broadly understood civil, business, banking, real estate, construction investment, intellectual and industrial property law, copyright law, family law, energy law, constitutional law, and providing comprehensive legal assistance in judicial, administrative, and judicial-administrative proceedings, as well as alternative dispute resolution methods (mediation, arbitration).

He has served as a mediator and arbitrator at the Arbitration Court of the Polish Chamber of Commerce in Warsaw (1999–2005 Vice-President), the Arbitration Court of SIDiR in Warsaw, the Arbitration Court of Western Pomerania at the Northern Chamber of Commerce in Szczecin, and the Court of Arbitration of the Polish-German Chamber of Industry and Commerce in Warsaw. He is a mediator at the International Mediation Centre in Poland, the Mediation Centre at the Polish Chamber of Commerce, and the Economic Mediation Centre at the Gas Industry Chamber of Commerce. He is a member of the Warsaw Chamber of Commerce, Deputy Chairman of the Supervisory Board of MUZA S.A., the Polish-French Chamber of Commerce (CCIFP), the Polish National Committee of the International Chamber of Commerce (ICC Polska), the Board of the Association of Friends of Warsaw, and the Central Council of the “Ordynacka” Association. He is an honorary member of the International Private Law Association in Lugano, Switzerland.

He served as Chief of the Chancellery of the Sejm from 2001 to 2004. He was the former President of the Boards of Investgas S.A. in Warsaw, Mazur Trading Environment Sp. z o.o. in Warsaw, and the Foundation for Supporting Economic Initiatives. He has been a former member of the Supervisory Board of Polskie Radio S.A. and the Board of the Polish Olympic Foundation in Warsaw, Editorial Board of the bi-monthly “Przegląd Sejmowy” (2004–2006), and from 2017 to 2021 a member of the Legislative Commission of the National Bar Council and the Supervisory Board of Bank Inicjatyw Gospodarczych S.A. (1989–1991). He was the former Secretary of the Supervisory Board of Polskie Radio S.A., the Supervisory Board of the Powszechne Towarzystwo Emerytalne H-M-C S.A., Chairman of the Supervisory Board of PERN “Przyjaźń” S.A. in Płock, Deputy Chairman of the Mazovian Regional Health Fund in Warsaw (1999–2001). He was the former President of the National Council of the Society for Supporting Economic Initiatives (1996–2005), Vice President of the Polish Chamber of Commerce in Warsaw (1997–2004), and Vice President of the Polish Fencing Club Board (2003–2023). From 1998 to 2002, he served as a member of the Mazovian Voivodeship Sejm in the first term and as Chairman of the Committee of the Mazovian Voivodeship Assembly. He was also a former judge of the State Tribunal (1993–1997) and the Stock Exchange House Court in Warsaw (1997–2001).

He has been awarded several distinctions, including: Officer's Cross of the Order of Polonia Restituta, Cross of the White Star II Class for Merits to the State and Nation of Estonia, Honorary Gold Badge of the Polish Chamber of Commerce, Gold Medal of the Polish Academy of Success, Gold Badge of ZSP, Medal "For Merits to the Student Movement,” Title “Benevolenti” for Supporting Pro-Social Initiatives of the Pro Seniore Foundation and Charitable Activities for Senior Doctors, Badge of “Distinguished Activist of the Cooperative Movement,” Honorary Badge “For Merits to Warsaw.”

He is an independent member of the Supervisory Board.

Radosław Niedzielski

Member of the Supervisory Board.
A manager with experience in the public sector. A graduate of the Jagiellonian University and the National School of Public Administration. He gained and developed his professional experience in the Ministry of the State Treasury, the Chancellery of the Prime Minister, Agencja Rozwoju Przemysłu S.A. and Bank Gospodarstwa Krajowego. He was responsible for exercising rights from shares and stakes in over 150 companies with the participation of the State Treasury. He led investment projects involving direct capital entry from the State Treasury or a state legal entity.

An expert in restructuring, including the use of public aid. Co-author of a state aid program for the rescue and restructuring of companies, which was notified to the European Commission, and operationalized five years later under national law.

Currently, he serves as the Vice President of the Management Board at Agencja Rozwoju Przemysłu S.A., where he is responsible for finance and overseeing the Capital Group.

He is an independent member of the Supervisory Board.

Witold Walkowiak

Member of the Supervisory Board.
He has over 25 years of experience in the financial sector in Poland and abroad. He began his banking career at Bank Handlowy w Warszawie S.A., where he held positions ranging from Deputy Head of Department to Vice President of the Management Board. He also served as Vice President of the Management Board at Bank Przemysłowo-Handlowy S.A. He gained extensive experience in the insurance sector. He served as a member of the Management Board of PZU S.A. He was also associated with the Dutch insurance group Achmea, where he worked as Chief Financial Officer of the European Department and served as a member of boards of directors and chairman of audit committees at Friends First in Dublin and Interamerican in Athens. For nearly 10 years, he was Vice President of the Management Boards of insurance companies within the Warta Group.

The core areas of his expertise and responsibility throughout his career in the financial sector included accounting and financial reporting, financial planning and controlling, risk management, and asset management.

He was a member of the Management Board of the Polish Bank Association and the Polish Chamber of Insurance.

He is currently a lecturer at the Vistula University of Finance and Business.

He is a graduate of the SGH Warsaw School of Economics and holds a PhD in Economics. He was a British Council scholar at the University of Cambridge and a Fulbright scholar at the Brookings Institution in Washington, D.C.

He is an independent Member of the Supervisory Board.

Magdalena Joanna Dziewguć

Secretary of the Supervisory Board.
Magdalena Joanna Dziewguć is a manager with over 20 years of experience in the new technologies sector, specializing in digital transformation and innovation. She holds a Master's degree in Law and has completed numerous postgraduate programs, including an Executive MBA at SGH Warsaw School of Economics as well as programs at Harvard Business School. She also holds the prestigious Corporate Board Director diploma awarded by that institution.

She is a co-founder of Digital University and the LiderSHE Association, which promotes women's participation in public life. She has extensive experience serving on supervisory boards of both state-owned companies and companies listed on European stock exchanges. She currently serves as a Member of the Supervisory Board of InPost. Previously, she was a member of supervisory boards including PGE Dystrybucja, BNP Paribas Bank Polska and Wrocław University of Science and Technology.

Her professional career includes key roles at Google, Exatel, Polkomtel, and Orange. At Google Cloud, she is responsible for the development of operations in Central and Eastern Europe, including the launch of the first public cloud technology region in Eastern Europe.

Recognized as one of the most influential women in the technology sector in Poland, she has received numerous awards, including Executive Club CEO of the Year. She was a finalist in the Warszawianka Roku 2022 ranking.

On a daily basis, she is a mother of three and is actively engaged in initiatives supporting women's professional activation and increasing their participation in the economy and public governance.

He is an independent Member of the Supervisory Board.

The six Members of the Supervisory Board, namely: Artur Nowak-Far, Krzysztof Czeszejko-Sochacki, Radosław Niedzielski, Jacek Nieścior, Witold Walkowiak, and Magdalena Joanna Dziewguć, meet the independence criteria set out in the Act of 11 May 2017 on Statutory Auditors, Audit Firms and Public Oversight, and do not have any actual or material relationships with a shareholder holding at least 5% of the total number of votes in the Company.

On 6 February 2025, Mr Artur Olech submitted his resignation from the position of Chairman of the Supervisory Board of the Bank and from membership in the Bank's Supervisory Board, effective at the end of the day on 5 March 2025. The resignation did not specify the reasons for stepping down.

On 6 March 2025, the Extraordinary General Meeting of the Bank, having taken into account the assessment of compliance with the suitability requirements, appointed:

1) Mr Andrzej Klesyk and
2) Mr Mariusz Jaszczyk

to the Supervisory Board of the Bank for a joint three-year term of office, which commenced on 18 April 2024.

According to the submitted statements, none of the above-mentioned members of the Supervisory Board of the Bank conducts any business competitive with the Bank, participates in a competing company as a partner in a civil law partnership, partnership or capital company, or participates in a competing legal entity as a member of its governing body. According to the submitted statements, none of the above-mentioned members of the Supervisory Board of the Bank is entered in the Register of Insolvent Debtors maintained pursuant to the Act of 20 August 1997 on the National Court Register.

From 6 March to 12 March 2025, the composition of the Supervisory Board of the Bank was as follows:

1) Mr Andrzej Klesyk – Member of the Supervisory Board,
2) Mr Artur Nowak-Far – Deputy Chairman of the Supervisory Board,
3) Mr Bartosz Grześkowiak – Deputy Chairman of the Supervisory Board,
4) Ms Magdalena Joanna Dziewguć – Member of the Supervisory Board,
5) Mr Krzysztof Czeszejko-Sochacki – Member of the Supervisory Board,
6) Mr Radosław Niedzielski – Member of the Supervisory Board,
7) Mr Jacek Nieścior – Member of the Supervisory Board,
8) Mr Witold Walkowiak – Member of the Supervisory Board,
9) Mr Mariusz Jaszczyk – Member of the Supervisory Board.

On 13 March 2025, the Supervisory Board of the Bank elected Mr Andrzej Klesyk as Chairman of the Supervisory Board and Ms Magdalena Joanna Dziewguć as Secretary of the Supervisory Board.

Accordingly, from 13 March to 5 November 2025, the composition of the Supervisory Board of the Bank was as follows:

1) Mr Andrzej Klesyk – Chairman of the Supervisory Board,
2) Mr Artur Nowak-Far – Deputy Chairman of the Supervisory Board,
3) Mr Bartosz Grześkowiak – Deputy Chairman of the Supervisory Board,
4) Ms Magdalena Joanna Dziewguć – Secretary of the Supervisory Board,
5) Mr Krzysztof Czeszejko-Sochacki – Member of the Supervisory Board,
6) Mr Radosław Niedzielski – Member of the Supervisory Board,
7) Mr Jacek Nieścior – Member of the Supervisory Board,
8) Mr Witold Walkowiak – Member of the Supervisory Board,
9) Mr Mariusz Jaszczyk – Member of the Supervisory Board.

Andrzej Klesyk

Chairman of the Supervisory Board.
He is a graduate of the John Paul II Catholic University of Lublin, Faculty of Social Sciences, majoring in Economics, and Harvard Business School, where he obtained an MBA degree.

In addition, he completed numerous international training programs related to the financial sector and management, including global training programs for partners and managing directors of The Boston Consulting Group. He has extensive experience in consulting for the financial and insurance sectors.

He began his professional career in 1989–1991 as an assistant at the Catholic University of Lublin. From April 1990 to January 1991, he served as Assistant to the Minister's Advisor at the Ministry of Ownership Transformations. From January to August 1991, he worked as a Researcher at Kidder, Peabody Company and Coopers & Lybrand in New York.

From June to August 1992, he completed an internship at McKinsey & Company in Germany. From October 1993 to February 2000, he served as Senior Engagement Manager at the London office of McKinsey & Company.

From February to December 2000, he was President of the Management Board of Inteligo Financial Services SA. From December 2000 to February 2003, he served as a Member of the Management Board of Bankgesellschaft Berlin (Polska) SA. From April 2003 to December 2007, he held the position of Partner and Managing Director at The Boston Consulting Group in Warsaw, where he cooperated, among others, with PZU on insurance projects related to claims handling, direct insurance, assistance services, as well as corporate governance and intra-group relations within the PZU Group.

From 14 December 2007 to 8 December 2015, he served as President of the Management Board of PZU S.A. In this role, he was responsible for the management of the Company and the PZU Group. In particular, he was responsible for strategy, HR policy, investment policy, and corporate governance support functions, including legal affairs, corporate governance, and internal control. He led the IPO of PZU, the largest IPO on the Warsaw Stock Exchange at that time.

In the years 2017–2019, he served as Chairman of the Supervisory Board of Best SA. From 2017 to 2022, at NKBM Maribor, he was Deputy Chairman of the Supervisory Board and Chairman of the Audit Committee. He also served as a Non-Executive Director, Chairman of the Audit Committee, and Member of the Strategy Committee at Play Communication from 2014 to 2021. He led the first wave of restructuring of the largest insurance company in Greece, Ethniki, following its acquisition by CVC, one of the world's largest private equity firms, serving as Chairman of the Board of Directors and Chairman of the Nomination and Remuneration Committee. From 2020 until the end of February 2025, he served as Managing Partner at Cornerstone Partners, where he was responsible for several portfolio companies.

Mariusz Jaszczyk

Member of the Supervisory Board.
Vice President of the Management Board of Polski Fundusz Rozwoju S.A. ("PFR S.A.") for Finance and Development. He is a manager with over a decade of experience in corporate finance and accounting.

He gained professional experience at consulting firms KPMG and EY, financial institutions such as the PKO BP Group and Polski Fundusz Rozwoju Group, as well as at Telematics Technologies. He was a co-author of the Employee Capital Plans (PPK) Act. He served as Managing Director of the Finance Division at PFR S.A.

He completed doctoral studies at the SGH Warsaw School of Economics, College of Management and Finance, where he had previously earned a Master's degree in Finance and Banking. Since 2009, he has been listed as a statutory auditor by the Polish Chamber of Statutory Auditors.

On 3 November 2025, resignations were submitted, effective at the end of 5 November 2025, by:

1) Mr Andrzej Klesyk from the position of Chairman of the Supervisory Board of the Bank and from membership in the Supervisory Board of the Bank,
2) Mr Radosław Niedzielski from membership in the Supervisory Board of the Bank. The resignations did not specify the reasons for stepping down.

On 6 November 2025, the Extraordinary General Meeting of the Bank, having taken into account the assessment of compliance with the suitability requirements, appointed:

1) Mr Bogdan Benczak
2) Ms Diana Dębowczyk

to the Supervisory Board of the Bank for a joint three-year term of office, which commenced on 18 April 2024.

According to the submitted statements, none of the above-mentioned members of the Supervisory Board of the Bank conducts any business competitive with the Bank, participates in a competing company as a partner in a civil law partnership, partnership or capital company, or participates in a competing legal entity as a member of its governing body. According to the submitted statements, none of the above-mentioned members of the Supervisory Board of the Bank is entered in the Register of Insolvent Debtors maintained pursuant to the Act of 20 August 1997 on the National Court Register.

From 6 November to 13 November 2025, the composition of the Supervisory Board of the Bank was as follows:

1) Mr Bogdan Benczak – Member of the Supervisory Board,
2) Mr Artur Nowak-Far – Deputy Chairman of the Supervisory Board,
3) Mr Bartosz Grześkowiak – Deputy Chairman of the Supervisory Board,
4) Ms Magdalena Joanna Dziewguć – Secretary of the Supervisory Board,
5) Mr Krzysztof Czeszejko-Sochacki – Member of the Supervisory Board,
6) Ms Diana Dębowczyk – Member of the Supervisory Board,
7) Mr Jacek Nieścior – Member of the Supervisory Board,
8) Mr Witold Walkowiak – Member of the Supervisory Board,
9) Mr Mariusz Jaszczyk – Member of the Supervisory Board.

On 14 November 2025, the Supervisory Board of the Bank elected Mr Bogdan Benczak as Chairman of the Supervisory Board.

Accordingly, from 14 November to 31 December 2025, the composition of the Supervisory Board of the Bank was as follows:

1) Mr Bogdan Benczak – Chairman of the Supervisory Board,
2) Mr Artur Nowak-Far – Deputy Chairman of the Supervisory Board,
3) Mr Bartosz Grześkowiak – Deputy Chairman of the Supervisory Board,
4) Ms Magdalena Joanna Dziewguć – Secretary of the Supervisory Board,
5) Mr Krzysztof Czeszejko-Sochacki – Member of the Supervisory Board,
6) Ms Diana Dębowczyk – Member of the Supervisory Board,
7) Mr Jacek Nieścior – Member of the Supervisory Board,
8) Mr Witold Walkowiak – Member of the Supervisory Board,
9) Mr Mariusz Jaszczyk – Member of the Supervisory Board.

Bogdan Benczak

Chairman of the Supervisory Board.
He is a legal advisor, graduate of the Faculty of Law at the University of Warsaw, postgraduate studies at the Cracow University of Economics, and an MBA in Management from the University of Gdańsk. He currently serves as a Member of the Management Board of PZU S.A., heading the Board's work pending approval from the Polish Financial Supervision Authority for his appointment as President of the Management Board.

He is a manager with many years of experience in supervisory and management bodies of companies in Poland and the Baltic states. He has held key positions in numerous entities within the PZU Group. From 2008 to 2015, he was President of the PZU Foundation and Director of the Foreign Operations Office and Business Development Office of PZU (2008–2014). From 2010 to 2014, he served as President of UAB PZU Lietuva, from 2009 to 2017 as President of UAB PZU Lietuva Gyvybės Draudimas, and from 2014 to 2017 as President of AAS BALTA, while also acting as Managing Director for Foreign Operations at PZU S.A. From 2015 to 2017, he was a Member of the Management Board of AB Lietuvos Draudimas. Between 2018 and 2022, he was Member of the Management Board and President of ERGO Insurance SE / ERGO Life Insurance SE. From 2023 to 2024, he served as General Director of ADB Gjensidige Lietuva. From February to September 2025, he held the position of Managing Director for Corporate Affairs in the PZU Group. Currently, he is Chairman of the Supervisory Boards of PZU Życie S.A., AB Lietuvos Draudimas, UAB PZU Lietuva Gyvybės Draudimas, PrJSC IC PZU Ukraine and PrJSC IC PZU Ukraine Life Insurance, and PZU Zdrowie S.A., a Member of the Supervisory Board of TU Link 4 S.A., a Member of the Audit Committee of the Polish Chamber of Insurance, and sits on the board of the Polish National Foundation.

Diana Dębowczyk

Member of the Supervisory Board.
MBA, ACO – Director of the Minister's Office at the Ministry of State Assets. She is a legal advisor and a certified compliance officer with over 15 years of experience in legal advisory, compliance, business ethics, risk management, and internal legislation.

She currently serves as Director of the Minister's Office at the Ministry of State Assets, where she is responsible for coordinating the Minister's and the Ministry's leadership's strategic actions, including cooperation with the Chancellery of the Prime Minister, the Sejm, the Senate, and other public administration bodies.

Previously, she served as Director of the Compliance Office at the Industrial Development Agency S.A., where she was responsible for comprehensive management of the compliance system and business ethics. She has extensive experience in building and implementing compliance systems in large organizations, creating internal regulations, and conducting investigative proceedings. At Totalizator Sportowy, including as Chief Compliance Officer, she managed the compliance, internal audit, and internal legislation areas, participating in processes related to the introduction of new products and organizational restructuring of the company. She also developed her professional experience working in law firms, advising companies on corporate law, investment, and regulatory compliance. She holds an Executive MBA (Institute of Economic Sciences, Polish Academy of Sciences) and an MBA in Compliance Analytics (Leon Koźmiński Academy). She is a Certified Approved Compliance Officer (2018).

Audit Committee

In 2025, the Audit Committee operated based on:

1) The Rules of Procedure of the Supervisory Board, adopted by the Supervisory Board of the Bank's Resolution no. 116/23 of 18 October 2023, and the Rules of Procedure of the Audit Committee of the Supervisory Board of Bank Polska Kasa Opieki S.A., adopted by the Supervisory Board of the Bank's Resolution no. 118/23 of 18 October 2023.
2) The Rules of Procedure of the Supervisory Board and the Rules of Procedure of the Audit Committee of the Supervisory Board of Bank Polska Kasa Opieki S.A., adopted by the Supervisory Board of the Bank's Resolution no. 5/25 of 31 January 2025.

Activities of the Audit Committee

The purpose of the Audit Committee is to assist the Supervisory Board of the Bank in fulfilling its duties, particularly regarding:

1) monitoring the financial reporting process,
2) monitoring the effectiveness of internal control systems, risk management systems, and internal audit, including in the area of financial reporting,
3) monitoring the performance of financial auditing activities, specifically the audit performed by the auditing firm, including the conclusions and findings of the Polish Agency for Audit Oversight resulting from its inspection of the auditing firm,
4) controlling and monitoring the independence of the auditor and the auditing firm, especially when the auditing firm provides other services besides the audit to the Bank,
5) informing the Supervisory Board of the Bank about the results of the audit and explaining how the audit contributed to the reliability of financial reporting, as well as the role of the Audit Committee in the audit process,
6) assessing the independence of the auditor and approving the provision of permitted non-audit services by the auditor,
7) developing the policy for selecting an auditing firm to perform the audit,
8) developing the policy for providing non-audit services related to financial reporting by the auditing firm conducting the audit, its related entities, and the auditor network,
9) defining the procedure for selecting an auditing firm to perform the audit of financial statements,
10) presenting to the Supervisory Board of the Bank recommendations for selecting an auditing firm to perform the audit of financial statements,
11) submitting recommendations to the Supervisory Board of the Bank to ensure the reliability of the financial reporting process,
12) reviewing the audit plan presented by Internal Audit for the given financial year and making recommendations to the Supervisory Board regarding its approval,
13) reviewing, at least once a year, the process of preparing annual and interim financial statements based on reports provided by the relevant department of the Bank's headquarters,
14) evaluating significant (i.e., those affecting the Bank's operations, financial statements, reputation, and legal compliance) conclusions resulting from the work of the Bank's Internal Audit or from other external audits and proceedings, particularly reports from the Polish Financial Supervision Authority,
15) supervising corrective actions regarding identified irregularities,
16) meeting at least once a year with the auditor to review the annual audit report,
17) reporting at least once a year to the Supervisory Board on its activities and providing quarterly updates on supervisory activities and their results,

18) maintaining effective working relationships with the Supervisory Board, the Management Board, internal auditors, and external auditors; and
19) analysing and reporting on transactions between related parties, especially in situations involving a direct or indirect conflict of interest.

The Audit Committee meets as necessary, but no less than four times a year, on dates aligned with the key dates in the Bank's quarterly reporting cycle and the review of the annual audit plan submitted by the Head of the Internal Audit Department.

In 2025, the Audit Committee held 14 meetings. The Audit Committee prepares a report on its activities once per quarter, which includes information on the matters discussed, the information acknowledged, as well as data on the number of members attending the meetings and the number of resolutions adopted.

Composition of the Audit Committee

The Audit Committee consists of 3 (three) to 7 (seven) members selected from the members of the Supervisory Board. At least one member of the Audit Committee must have knowledge and skills in accounting or financial statement auditing.

The majority of the Audit Committee members, including its Chair, were independent of the Bank in accordance with Article 129(3) of the Act of 11 May 2017 on statutory auditors, audit firms, and public supervision (hereinafter referred to as the "Act on Statutory Auditors, Audit Firms, and Public Supervision").

Members of the Audit Committee possess the necessary skills to appropriately perform their assigned function, including relevant education and professional experience. The qualifications of the members of the Supervisory Board, including the education and experience of the Audit Committee members, along with the manner in which these qualifications were obtained, have been presented on the Bank's website.[23]

From 1 January to 17 February 2025, the composition of the Audit Committee was as follows:

1) Mr Jacek Nieścior – Chair of the Committee,
2) Mr Krzysztof Czeszejko-Sochacki – Member of the Committee,
3) Mr Robert Niedzielski – Member of the Committee,
4) Mr Artur Nowak-Far – Member of the Committee,
5) Mr Witold Walkowiak – Member of the Committee.

On 18 February 2025, the Supervisory Board of the Bank appointed Ms Magdalena Joanna Dziewguć to the Audit Committee of the Supervisory Board of the Bank.

As a result, from 18 February to 8 May 2025, the composition of the Audit Committee was as follows:

1) Mr Jacek Nieścior – Chair of the Committee,
2) Mr Krzysztof Czeszejko-Sochacki – Member of the Committee,
3) Mr Robert Niedzielski – Member of the Committee,
4) Mr Artur Nowak-Far – Member of the Committee,
5) Mr Witold Walkowiak – Member of the Committee,
6) Ms Magdalena Joanna Dziewguć – Member of the Committee.

On 6 March 2025, the Extraordinary General Meeting of the Bank, considering the assessment of meeting the eligibility requirements, appointed Mr Mariusz Jaszczyk to the composition of the Supervisory Board of the Bank for a joint three-year term, which began on 18 April 2024.

On 9 May 2025, the Supervisory Board of the Bank appointed Mr Mariusz Jaszczyk to the Audit Committee of the Supervisory Board of the Bank.

As a result, from 9 May 2025 to 17 June 2025, the composition of the Audit Committee was as follows:

1) Mr Jacek Nieścior – Chair of the Committee,
2) Mr Krzysztof Czeszejko-Sochacki – Member of the Committee,
3) Mr Mariusz Jaszczyk – Member of the Committee,
4) Mr Robert Niedzielski – Member of the Committee,
5) Mr Artur Nowak-Far – Member of the Committee,
6) Mr Witold Walkowiak – Member of the Committee.
7) Ms Magdalena Joanna Dziewguć – Member of the Committee.

On 18 June 2025, the Audit Committee of the Supervisory Board of the Bank, taking into account the assessment of individual suitability, elected Mr Witold Walkowiak as the Secretary of the Committee.

[23] https://www.pekao.com.pl/o-banku/wladze-banku.html

As a result, from 18 June 2025 to 05 November 2025, the composition of the Audit Committee was as follows:

1) Mr Jacek Nieścior – Chair of the Committee,
2) Mr Krzysztof Czeszejko-Sochacki – Member of the Committee,
3) Mr Mariusz Jaszczyk – Member of the Committee,
4) Ms Magdalena Joanna Dziewguć – Member of the Committee,
5) Mr Robert Niedzielski – Member of the Committee,
6) Mr Artur Nowak-Far – Member of the Committee,
7) Mr Witold Walkowiak – Secretary of the Committee.

On 3 November 2025, Mr Radosław Niedzielski submitted his resignation, effective at the end of 5 November 2025, from the membership of the Supervisory Board of the Bank.

As a result, from 6 November to 31 December 2025, the composition of the Audit Committee was as follows:

1) Mr Jacek Nieścior – Chair of the Committee,
2) Mr Krzysztof Czeszejko-Sochacki – Member of the Committee,
3) Ms Magdalena Joanna Dziewguć – Member of the Committee,
4) Mr Mariusz Jaszczyk – Member of the Committee,
5) Mr Artur Nowak-Far – Member of the Committee,
6) Mr Witold Walkowiak – Secretary of the Committee.

Mr Jacek Nieścior, Mr Krzysztof Czeszejko-Sochacki, Ms Magdalena Joanna Dziewguć, Mr Artur Nowak-Far, and Mr Witold Walkowiak meet the independence criteria.

On 1 January 2025, amendments to the Accounting Act and the Act on Statutory Auditors, Audit Firms and Public Supervision, introduced by the Act of 6 December 2024 on Amendments to the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision, and Certain Other Acts (Journal of Laws of 2024, item 1863), came into force. These amendments implement the EU directive on corporate reporting related to sustainable development into Polish law.

To ensure compliance of the Bank's internal regulations with the introduced changes, in July 2025, as a public interest entity, the Bank adopted updated policies and procedures specified in Article 130(1)(5–7) of the Act on Statutory Auditors, Audit Firms, and Public Supervision, based on resolutions of the Bank's Supervisory Board. These include:

1) "Policy and procedure for the selection of an audit firm to conduct he statutory audit of the financial statements of Bank Pekao S.A., the attestation of sustainability reporting and the rules of cooperation with the audit firm, the statutory auditor and the supervisory authority" (hereinafter the "Selection Policy"),
2) "Procedure for the selection of the audit firm" (hereinafter the "Selection Procedure"),
3) "Policy on the provision of services by the auditor firm conducting the audit or the attestation of sustainability reporting, by entities affiliated with the auditor firm and by a member of the auditor firm's network, for permitted non-audit services" (hereinafter the "Services Provision Policy").

The adopted Selection Policy, Selection Procedure and Services Provision Policy include the relevant changes concerning sustainability reporting. The regulations take into account the fact that, based on Resolution no. 56 of the Ordinary General Meeting of the Bank, dated 24 April 2025, regarding amendments to the Bank's Articles of Association and authorizing the Bank's Supervisory Board to approve the consolidated text of the Bank's Statutes, the Bank utilized the option to transfer the competence of the General Meeting to the Supervisory Board in the matter of selecting the audit firm for the attestation of sustainability reporting, by amending the Bank's Statutes accordingly. The Bank received the approval of the Polish Financial Supervision Authority for the aforementioned amendment to the Bank's Statutes.

These updated regulations replaced the regulations approved by Resolution no. 120/23 of the Bank's Supervisory Board dated 18 October 2023, concerning the adoption of the "Policy on the selection of the audit firm for conducting the statutory audit of the financial statements of Bank Pekao S.A. and the rules of cooperation with the audit firm, the statutory auditor and the supervisory authority" as well as the "Procedure for the selection of the audit firm for conducting the statutory audit of the financial statements of Bank Pekao S.A."

The regulations mentioned above have been updated as follows:

1) "Policy on the selection of the audit firm for conducting the statutory audit of the financial statements of Bank Pekao S.A. and the rules of cooperation with the audit firm, the statutory auditor and the supervisory authority" – the document has been expanded to include the possibility of conducting sustainability reporting attestation (due to the relevant amendments introduced by the Act of 6 December 2024 on amendments to the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision, and certain other acts).

2) “Procedure for the selection of the audit firm for conducting the statutory audit of the financial statements of Bank Pekao S.A.” – the document has been expanded to include the possibility of purchasing sustainability reporting attestation services and amended regarding the analysis of corruption risk (due to the relevant amendments introduced by the Act of 6 December 2024 on amendments to the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision, and certain other acts).
3) “Policy on the provision of services by the audit firm conducting the audit or sustainability reporting, by entities affiliated with the auditor firm and by a member of the auditor firm's network, for permitted non-audit services” – the document has been expanded to include sustainability reporting attestation services (due to the relevant amendments introduced by the Act of 6 December 2024 on amendments to the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision, and certain other acts).

In accordance with the Selection Procedure, the process of selecting the audit firm is carried out through a tender procedure. As a result of the procedure organized by the Bank, the Audit Committee submits a recommendation to the Supervisory Board regarding the selection of the audit firm. This recommendation, unless it concerns the renewal of the audit mandate, includes at least two options for selecting the audit firm, along with justification and an indication of the preferred choice. In the case of extending the contract with the audit firm, the Audit Committee recommends that the Supervisory Board select the current audit firm. The Supervisory Board, after reviewing the recommendation and (in the case of non-renewal of the mandate) the preference of the Audit Committee, selects the audit firm, specifying the years for which the financial statements of the Bank and the consolidated financial statements of the Bank’s Capital Group, or the sustainability report, will be subject to statutory audit by the selected audit firm.

On 21 November 2025, the Supervisory Board adopted a resolution regarding the acceptance of the recommendation and the selection of the audit firm PricewaterhouseCoopers Polska Spółka z ograniczoną odpowiedzialnością Audyt sp.k. for the attestation of sustainability reporting of the Bank’s Capital Group for the years 2025–2028, with an option for extension for the years 2029–2030.

Regarding the statutory audit of the Bank’s financial statements and the consolidated financial statements of the Bank’s Capital Group for the five financial years from 2024 to 2028, with an option to extend the contract for the following two financial years, 2029 and 2030, according to the Supervisory Board’s resolution of 7 November 2023, the audit firm carrying out the audit is PricewaterhouseCoopers Polska Spółka z ograniczoną odpowiedzialnością Audyt sp.k.

The Services Provision Policy stipulates that the provision of permitted non-audit services by the audit firm conducting the audit, entities affiliated with the audit firm, or members of the audit firm’s network to the Bank requires the approval of the Audit Committee. Furthermore, the Audit Committee grants approval for the provision of permitted non-audit services to the subsidiaries of the Bank based on the subsidiary's request. An essential part of such a request is the consent of the subsidiary’s Audit Committee, which applies for approval. Entities belonging to the Bank's Capital Group are also required to obtain the consent of the Audit Committee of the parent entity (PZU S.A.) for the purchase of a permitted non-audit service. In 2025, the audit firm PricewaterhouseCoopers Polska Spółka z ograniczoną odpowiedzialnością Audyt sp.k. provided permitted non-audit services to the Bank and its subsidiaries. Before entering into an agreement for the provision of permitted non-audit services, the Audit Committee, the Audit Committee of the subsidiary (if a public interest entity), and the Audit Committee of the parent entity of the Bank assessed the independence of the audit firm and granted approval for the provision of these services.

Nomination and Remuneration Committee

In 2025, the Nomination and Remuneration Committee operated based on:

1) The Rules of Procedure of the Supervisory Board adopted by Resolution no. 116/23 of the Bank’s Supervisory Board of 18 October 2023, and the Rules of Procedure of the Nomination and Remuneration Committee of the Supervisory Board of Bank Polska Kasa Opieki Spółka Akcyjna adopted by Resolution no. 117/23 of the Bank’s Supervisory Board of 18 October 2023.
2) The Rules of Procedure of the Supervisory Board and the Rules of Procedure of the Nomination and Remuneration Committee of the Supervisory Board of Bank Polska Kasa Opieki Spółka Akcyjna adopted by Resolution no. 5/25 of the Bank’s Supervisory Board of 31 January 2025.

Activities of the Nomination and Remuneration Committee

The purpose of the Nomination and Remuneration Committee is to support the Supervisory Board in fulfilling its duties, including shaping the composition of the Bank's Management Board and overseeing the Bank’s Management Board’s policy regarding the selection and appointment of individuals for executive positions within the Bank. The Committee's activities are guided by prudent and stable risk, capital, and liquidity management, with particular attention paid to the long-term welfare of the Bank and the interests of the Bank’s shareholders.

The tasks of the Nomination and Remuneration Committee include, but are not limited to:

1) adopting the diversity policy for the composition of the Bank's Management Board and Supervisory Board, taking into account a broad range of characteristics and competencies required for individuals holding positions as members of the Management Board,
2) recommending candidates for the Management Board of the Bank, considering the necessary knowledge, competencies, and experience required for the effective management of the Bank, as well as the diversity of the Management Board's composition,
3) defining the scope of duties for candidates to the Management Board of the Bank, as well as the knowledge and competency requirements and the expected time commitment needed for the role,
4) determining the target representation of the underrepresented gender on the Management Board of the Bank and the Supervisory Board and developing a diversity policy for both boards aimed at achieving this target,
5) conducting a periodic assessment, at least once a year, of the structure, size, composition, and effectiveness of the Management Board of the Bank and recommending changes to the Supervisory Board,
6) conducting a periodic assessment, at least once a year, of the knowledge, competencies, and experience of the Management Board of the Bank as a whole, as well as individual members, and informing the Management Board about the results of this evaluation,
7) conducting periodic reviews of the Management Board's policy regarding the selection and appointment of executive positions in the Bank and presenting recommendations to the Management Board in this regard,
8) presenting recommendations to the Supervisory Board regarding: a) the assessment of the individual suitability of candidates for the Management Board and Supervisory Board at the appointment stage, as well as current members of these bodies during their duties, in situations specified in the "Policy on the assessment of the suitability of proposed and appointed members of the Management Board, Supervisory Board and individuals holding key functions at Bank Polska Kasa Opieki Spółka Akcyjna," b) the collective suitability of the Management Board of the Bank and the Supervisory Board to ensure the appropriate level of collegial management or oversight of the Bank, c) succession plans for members of the Management Board of the Bank to ensure continuity of management.

In 2025, the Nomination and Remuneration Committee held 14 meetings. The Nomination and Remuneration Committee prepares a report on its activities quarterly, which includes information on matters discussed and acknowledged, as well as data regarding the number of members attending meetings and the number of resolutions passed.

Composition of the Nomination and Remuneration Committee
The Nomination and Remuneration Committee consists of 3 (three) to 7 (seven) members elected from among the members of the Supervisory Board.

From 1 January to 5 March 2025, the composition of the Nomination and Remuneration Committee was as follows:

1) Mr Artur Nowak-Far – Chairman of the Committee,
2) Mr Bartosz Grześkowiak – Secretary of the Committee,
3) Mr Artur Olech – Member of the Committee,
4) Mr Jacek Nieścior – Member of the Committee,
5) Mr Witold Walkowiak – Member of the Committee,
6) Ms Magdalena Joanna Dziewguć – Member of the Committee.

On 6 February 2025, Mr Artur Olech resigned from the position of Chairman of the Supervisory Board of the Bank and from the membership of the Bank's Supervisory Board, effective at the end of 5 March 2025. The resignation did not specify the reasons for stepping down.

Accordingly, from 6 March to 8 May 2025, the composition of the Nomination and Remuneration Committee was as follows:

1) Mr Artur Nowak-Far – Chairman of the Committee,
2) Mr Bartosz Grześkowiak – Secretary of the Committee,
3) Mr Jacek Nieścior – Member of the Committee,
4) Mr Witold Walkowiak – Member of the Committee,
5) Ms Magdalena Joanna Dziewguć – Member of the Committee.

On 6 March 2025, the Extraordinary General Meeting of the Bank, considering the assessment of meeting the eligibility requirements, appointed Mr Andrzej Klesyk to the composition of the Supervisory Board of the Bank for a joint three-year term, which began on 18 April 2024.

On 9 May 2025, the Supervisory Board appointed Mr Andrzej Klesyk to the Nomination and Remuneration Committee, taking into account the individual suitability assessment.

From 9 May to 5 November 2025, the composition of the Nomination and Remuneration Committee was as follows:

1) Mr Artur Nowak-Far – Chairman of the Committee,
2) Mr Bartosz Grześkowiak – Secretary of the Committee,
3) Mr Andrzej Klesyk – Member of the Committee,
4) Mr Jacek Nieścior – Member of the Committee,
5) Mr Witold Walkowiak – Member of the Committee,
6) Ms Magdalena Joanna Dziewguć – Member of the Committee.

On 3 November 2025, Mr Andrzej Klesyk resigned from his position as Chairman of the Supervisory Board of the Bank and from his membership in the Supervisory Board of the Bank, effective at the end of the day on 5 November 2025. The resignation did not specify the reasons for stepping down.

The Extraordinary General Meeting of the Bank on 6 November 2025, taking into account the assessment of the fulfilment of suitability requirements, appointed:

1) Mr Bogdan Benczak and
2) Ms Diana Dębowczyk

to the Supervisory Board of the Bank for a joint three-year term of office, which commenced on 18 April 2024.

For the period from 6 November to 26 November 2025, the composition of the Nomination and Remuneration Committee was as follows:

1) Mr Artur Nowak-Far – Chairman of the Committee,
2) Mr Bartosz Grześkowiak – Secretary of the Committee,
3) Mr Jacek Nieścior – Member of the Committee,
4) Mr Witold Walkowiak – Member of the Committee,
5) Ms Magdalena Joanna Dziewguć – Member of the Committee.

On 27 November 2025, the Supervisory Board appointed Mr Bogdan Benczak and Ms Diana Dębowczyk to the Nomination and Remuneration Committee, taking into account the individual suitability assessment.

For the period from 27 November to 31 December 2025, the composition of the Nomination and Remuneration Committee was as follows:

1) Mr Artur Nowak-Far – Chairman of the Committee,
2) Mr Bartosz Grześkowiak – Secretary of the Committee,
3) Mr Bogdan Benczak – Member of the Committee,
4) Ms Diana Dębowczyk – Member of the Committee,
5) Mr Jacek Nieścior – Member of the Committee,
6) Mr Witold Walkowiak – Member of the Committee,
7) Ms Magdalena Joanna Dziewguć – Member of the Committee.

Mr Artur Nowak-Far, Mr Jacek Nieścior, Mr Witold Walkowiak and Ms Magdalena Joanna Dziewguć meet the independence criteria.

Risk Committee
In 2025, the Risk Committee operated based on:

1) The Rules of Procedure of the Supervisory Board, adopted by the Supervisory Board of the Bank's Resolution no. 116/23 of 18 October 2023, and the Rules of Procedure of the Risk Committee of the Supervisory Board of Bank Polska Kasa Opieki S.A., adopted by the Supervisory Board of the Bank's Resolution no. 119/23 of 18 October 2023.
2) The Rules of Procedure of the Supervisory Board and the Rules of Procedure of the Risk Committee of the Supervisory Board of Bank Polska Kasa Opieki S.A., adopted by the Supervisory Board of the Bank's Resolution no. 5/25 of 31 January 2025.

Activities of the Risk Committee
The mission of the Committee is to support the Supervisory Board in fulfilling its duties related to overseeing the risk management system and assessing its adequacy and effectiveness. In its activities, the Committee is guided by prudent and stable management of risk, capital, and liquidity, with particular attention to the long-term well-being of the Bank and the interests of its shareholders.

The tasks of the Risk Committee include, among others, expressing opinions on:

1) the overall current and future risk readiness of the Bank, expressed in the form of risk appetite,
2) the risk management strategy developed by the Bank's Management Board, including policies related to credit, financial, and operational risks,
3) reports on the risk profile and the implementation of the risk management strategy presented by the Bank's Management Board.

Additionally, the Risk Committee supports the Supervisory Board in overseeing the implementation of the risk management strategy in the Bank's operations and verifies whether the general level of prices for liabilities and assets offered to customers fully reflects the Bank's business strategy and risks.

In 2025, the Risk Committee held 13 meetings. The Risk Committee prepares a report on its activities once per quarter, which includes information on the matters discussed, the information acknowledged, as well as data on the number of members attending the meetings and the number of resolutions adopted.

Composition of the Risk Committee

The Risk Committee consists of 3 (three) to 7 (seven) members selected from among the members of the Supervisory Board, with the majority of the members of the Risk Committee, including its Chairman, being independent members of the Supervisory Board.

From 1 January to 24 January 2025, the composition of the Risk Committee was as follows:

1) Mr Krzysztof Czeszejko-Sochacki – Chairman of the Committee,
2) Mr Radosław Niedzielski – Member of the Committee,
3) Mr Jacek Nieścior – Member of the Committee,
4) Mr Witold Walkowiak – Secretary of the Committee,
5) Ms Magdalena Joanna Dziewguć – Member of the Committee.

On 24 January 2025, Ms. Magdalena Joanna Dziewguć resigned from the position of Committee Member, effective on the day of resignation.

Therefore, from 24 January to 5 November 2025, the composition of the Risk Committee was as follows:

1) Mr Krzysztof Czeszejko-Sochacki – Chairman of the Committee,
2) Mr Radosław Niedzielski – Member of the Committee,
3) Mr Jacek Nieścior – Member of the Committee,
4) Mr Witold Walkowiak – Secretary of the Committee.

On 3 November 2025, Mr Radosław Niedzielski submitted his resignation from the Supervisory Board of the Bank, effective at the end of 5 November 2025.

Therefore, from 6 November to 26 November 2025, the composition of the Risk Committee was as follows:

1) Mr Krzysztof Czeszejko-Sochacki – Chairman of the Committee,
2) Mr Jacek Nieścior – Member of the Committee,
3) Mr Witold Walkowiak – Secretary of the Committee.

On 6 November 2025, the Extraordinary General Meeting of the Bank, considering the assessment of meeting the eligibility requirements, appointed Ms Diana Dębowczyk to the composition of the Supervisory Board of the Bank for a joint three-year term, which began on 18 April 2024.

On 27 November 2025, the Bank's Supervisory Board appointed Ms. Diana Dębowczyk to the Risk Committee, following an individual suitability assessment.

Therefore, from 27 November 2025 to 31 December 2025, the composition of the Risk Committee was as follows:

1) Mr Krzysztof Czeszejko-Sochacki – Chairman of the Committee,
2) Ms Diana Dębowczyk – Member of the Committee,
3) Mr Jacek Nieścior – Member of the Committee,
4) Mr Witold Walkowiak – Secretary of the Committee.

Mr Krzysztof Czeszejko-Sochacki, Mr Jacek Nieścior and Mr Witold Walkowiak meet the independence criteria.

10. Description of the diversity policy applied to the governing, managing, and supervisory bodies of the Bank, particularly with regard to age, gender, education, and professional experience, the objectives of this diversity policy, how it is implemented, and its effects during the reporting period [24]

On 3 November 2020, the Management Board of the Bank adopted by resolution, and on 4 November 2020, the Supervisory Board of the Bank approved by resolution the "Gender equality and diversity policy with regard to the Bank's employees, including Members of the Supervisory Board, Members of the Management Board and persons holding key functions at Bank Polska Kasa Opieki Spółka Akcyjna" (hereinafter the "Policy"). By Resolution no. 34, the Ordinary General Meeting of the Bank, held on 15 June 2022, adopted the Policy as regards the members of the Supervisory Board of Bank Polska Kasa Opieki Spółka Akcyjna, excluding § 8 of the Policy. The above-mentioned resolution of the Ordinary General Meeting stipulates that: "In order to ensure sufficient diversity in the Supervisory Board in terms of gender, the Bank will aim to achieve a 30% target as the minimum value of the proportion of each gender in the Supervisory Board. The Bank will make every effort to achieve this target at the earliest possible date, but no earlier than at the end of the current term of office of the Supervisory Board."

The Policy defines the Bank's strategy in terms of diversity management for the Bank's employees, including the differentiation in the selection of members of the Supervisory Board, members of the Management Board, and persons holding Key Functions at the Bank. It also outlines guidelines to ensure that the Bank's employees have opportunities to manage their careers, achieve success, and have their performance evaluated based on individual accomplishments, regardless of gender.

The aim of the Bank's diversity strategy is to ensure the high-quality performance of tasks by the Bank's employees, including the selection of competent individuals for positions in the Supervisory Board, Management Board, and Key Functions at the Bank, applying primarily objective merit-based criteria and considering the benefits of diversity.

The Bank's diversity strategy encompasses and utilizes differences to achieve the best results, which, in addition to knowledge, skills, and professional experience, stem from education, geographical origin, gender, and age. The diversity strategy regarding the selection of Supervisory Board members/Management Board members/persons holding Key Functions at the Bank is implemented in the processes of recruitment, suitability assessment and succession planning.

The current percentage of women in leadership positions at the Bank is 54.3%, and in senior management positions, it is 34.4%.

The application of the diversity policy is relevant in decision-making processes regarding: external recruitment, internal nominations, succession planning, in compliance with equal treatment regulations in employment relations, which include the principle of gender equality.

Given the regulations adopted in this regard and the importance placed by the Management Board of the Bank on the values presented in the Policy, it is subject to continuous review.

From 2021 to 2025, the gender distribution in the Management Board of the Bank was as follows:

	31.12.2021		31.12.2022		31.12.2023		31.12.2024		31.12.2025	
	No. of persons	**%**	**No. of persons**	**%**	**No. of persons**	**%**	**No. of persons**	**%**	**No. of persons**	**%**
Women	1	11%	1	11%	1	11%	1	16.7%	1	12.5%
Men	8	89%	8	89%	8	89%	5	83.3%	7	87.5%
Total	**9**	**100%**	**9**	**100%**	**9**	**100%**	**6**	**100%**	**8**	**100%**

From 2021 to 2025, the gender distribution in the Supervisory Board of the Bank was as follows:

	31.12.2021		31.12.2022		31.12.2023		31.12.2024		31.12.2025	
	No. of persons	**%**	**No. of persons**	**%**	**No. of persons**	**%**	**No. of persons**	**%**	**No. of persons**	**%**
Women	5	55.5%	5	55.5%	5	55.5%	1	12.5%	2	22.2%
Men	4	44.5%	4	44.5%	4	44.5%	7	87.5%	7	77.8%
Total	**9**	**100%**	**9**	**100%**	**9**	**100%**	**8**	**100%**	**9**	**100%**

[24] § 72(7)(5)(m) of the Regulation of the Minister of Finance of 6 June 2025.

13. Sustainability Statement of the Bank Pekao S.A. Group for 2025

13.1 General information

13.1.1 Basis for preparation of the Sustainability Statement [BP-1] [BP-2]

We have prepared the content of the *Sustainability Statement of the Bank Pekao Group* (hereinafter: the Sustainability Statement) on the basis of the provisions of:

- the Accounting Act of 29 September 1994 (Journal of Laws 1994 No. 121 item 591, as amended), implementing into the Polish legal order the provisions of the Corporate Sustainability Reporting Directive (hereinafter: CSRD),
- Regulation of the European Parliament and of the Council (EU) of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards (European Sustainability Reporting Standards, hereinafter: the ESRS Regulation or: ESRS).

The Pekao Group (hereinafter: the Pekao Group) reports non-financial data on an annual basis. The Sustainability Statement includes sustainability information concerning the Pekao Group for the period from 1 January 2025 to 31 December 2025. The data were consolidated using the full consolidation method. The scope of consolidation is consistent with the financial statements.

In the Sustainability Statement, we have also disclosed information with reference to the provisions of 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, and in accordance with Commission delegated regulations 2023/2485 and 2023/2486 (hereinafter: taxonomy disclosure).

The Pekao Group comprises the following entities: Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter: the Bank) as the parent entity, and subsidiaries and indirect subsidiaries, financial institutions operating in the markets of banking, asset management, brokerage services, transaction advisory, leasing and factoring. In addition, the Bank holds shares and equity interests in associates and minority interests.

Structure of the Pekao Group in 2025 - subsidiaries and indirect subsidiaries:

NAME	REGISTERED OFFICE	SCOPE OF ACTIVITY
Pekao Bank Hipoteczny S.A.	Warsaw	mortgage bank
Pekao Leasing Sp. z o.o.	Warsaw	leasing services
PEUF Sp. z o.o.	*Warsaw*	*auxiliary financial*
Pekao Investment Banking S.A.	Warsaw	brokerage
Pekao Inwestycje Dłużne Sp. z o.o. w organizacji	Warsaw	auxiliary financial
Pekao Faktoring Sp. z o.o.	Lublin	factoring services
Centrum Kart S.A.	Warsaw	auxiliary financial
Pekao Financial Services Sp. z o.o.	Warsaw	transfer agent
Pekao Direct Sp. z o.o.	Warsaw	body leasing
Pekao Property S.A. (w likwidacji)	Warsaw	property development activities
FPB Media Sp. z o.o. w upadłości	*Warsaw*	*property development activities*
Pekao Fundusz Kapitałowy Sp. z o.o.	Warsaw	business advisory
Pekao Investment Management S.A.	Warsaw	holding
Pekao TFI S.A.	*Warsaw*	*asset management*

Structure of the Pekao Group in 2024 - subsidiaries and indirect subsidiaries:

NAME	REGISTERED OFFICE	SCOPE OF ACTIVITY
Pekao Bank Hipoteczny S.A.	Warsaw	mortgage bank
Pekao Leasing Sp. z o.o.	Warsaw	leasing services
PEUF Sp. z o.o.	*Warsaw*	*auxiliary financial*
Pekao Investment Banking S.A.	Warsaw	brokerage
Pekao Faktoring Sp. z o.o.	Lublin	factoring services
Centrum Kart S.A.	Warsaw	auxiliary financial
Pekao Financial Services Sp. z o.o.	Warsaw	transfer agent
Pekao Direct Sp. z o.o.	Cracow	call centre services
Pekao Property S.A. (w likwidacji)	Warsaw	property development activities
FPB Media Sp. z o.o. w upadłości	*Warsaw*	*property development activities*
Pekao Fundusz Kapitałowy Sp. z o.o. w likwidacji	Warsaw	business advisory
Pekao Investment Management S.A.	Warsaw	holding
Pekao TFI S.A.	*Warsaw*	*asset management*

In the Sustainability Statement, we refer to the value chain at both the upstream and downstream levels of the Pekao Group. However, our metrics do not include value chain data estimated based on indirect sources. We also do not make use of the option to omit specific information concerning intellectual property, know-how or the effects of innovation; however, we do take into account the medium- and long-term time horizons defined in ESRS.

Forward-looking information in the individual chapters of the Sustainability Statement, which we present largely in the form of estimates, is provided based on the current legal status and current knowledge. In our approach to sustainability disclosures, we apply an approach aligned with stakeholders' expectations. At the same time, we consider the risk of uncertainty of the presented estimates, arising – in particular – from continuous changes in the economic, geopolitical and market situation, as well as climate change.

Our priority in the Pekao Group's sustainability reporting is to base disclosures on reliable data. In cooperation with entities in the value chain, we strive to obtain data of the best possible quality. We are aware that the quality of such data is significantly affected by external factors of a legislative, economic or market nature. In the double materiality assessment process and in the content of the Sustainability Statement, we have included forward-looking information and applied assumptions, forecasts and projections concerning, inter alia, climate risks, transition risks and opportunities. The forward-looking information reflects the current expectations of the Pekao Group and may be subject to uncertainty risk and to changes related to the economic, regulatory, market or climate situation.

In areas where we did not have complete actual data available, we applied estimates in line with best market practices to ensure continuity and completeness of reporting. This applies primarily to Scope 3 emissions, including: purchased goods and services (category 1), capital expenditure (category 2), business travel using external means of transport (category 6), employees' commuting to work (category 7) and emissions related to clients' activities (category 15). For category 15, we applied the PCAF methodology – Partnership for Carbon Accounting Financials – due to limited access to actual data obtained from clients and, consequently, the estimated nature of the calculations. In the remaining categories, we used available cost data, volume data, internal data and the results of employee surveys. Estimates were also applied in the areas of electricity and heat consumption where full metering data were not available. In 2025, we refined the estimates by obtaining actual consumption data from some energy carriers suppliers and conducting additional variance analysis against the previous reporting year.

The Bank systematically improves the quality of information obtained and seeks to reduce the share of estimates following the development of reporting methods and regulatory requirements concerning sustainability development.

After the end of the reporting period for 2024, there were no material events subject to disclosure in the Sustainability Statement and no reporting errors for 2024 were identified. In the Sustainability Statement for 2025, we adopted a change in the presentation of information on the gender pay gap – we adjusted the indicator developed by the working group at the Polish

Bank Association (ZBP). Additionally, an insignificant adjustment was made regarding the number of senior management staff in the Bank for 2024.

Detailed information on the methodology for calculating the pay gap can be found in the section Pay metrics (gender pay gap and total remuneration) of the Unit **[S1-16]** and changes in the number of senior management staff can be found in the section Diversity metrics of the Unit **[S1-9].**

In 2025, we also made changes to the calculation of the carbon footprint in scopes 1 and 2; therefore, we will present updated results for 2024 in the Sustainability Statement. Detailed information in this regard can be found in the section on Gross Scope 1, 2, and 3 greenhouse gas emissions and total greenhouse gas emissions **[E1-6]**.

External assurance

Our Sustainability Statement was subject to a limited assurance engagement carried out by the audit firm PricewaterhouseCoopers Polska spółka z ograniczoną odpowiedzialnością Audyt sp. k., with its registered office in Warszawa (KRS: 0000750050), in accordance with National Standard on Assurance Engagements 3002PL *"Assurance engagements other than audits or reviews of historical financial information" and "National Standard on Assurance Engagements Other than Audit and Review 3000 (Z) as adopted from the International Standard on Assurance Engagements 3000 (revised)"* – assurance engagements other than audits and reviews of historical financial information.

13.1.2 Corporate governance

We are one of the largest financial institutions in the Central and Eastern Europe region and the second largest universal bank in Poland, with over 352 billion in assets. Since 2017, we have been a part of the PZU S.A. Group (hereinafter: the PZU Group). We conduct business in the territory of the Republic of Poland. Our head office is located in Warszawa, at ul. Żubra 1 (postal code: 01-066). Our Bank operates as a joint-stock company, which has been listed on the Warsaw Stock Exchange since 1998. We operate under the provisions of law, in particular the Banking Law Act and the provisions of the Commercial Companies Code, and the provisions of the Statute of Bank Pekao (hereinafter: *the Bank's Statute*), the consolidated text of which is available at **[website]**. The Polish Financial Supervision Authority (hereinafter: KNF) supervises the Bank's operations.

13.1.2.1 Roles of the administrative, management and supervisory bodies [GOV-1]

The organisational structure of the Bank and the entities within the Pekao Group corresponds both to the scale and the nature of the business conducted.

General Meeting of Shareholders

The highest body of the Bank is the General Meeting of Shareholders (hereinafter: GMS). The scope of powers of the GMS is defined in statutory provisions, in supervisory recommendations of supervisory authorities and in the Bank's Statute. Resolutions are adopted by an absolute majority of votes, subject to the provisions of the Commercial Companies Code and the Bank's Statute.

Supervisory Board of the Bank

The Supervisory Board of the Bank (hereinafter: the Supervisory Board) exercises ongoing, comprehensive supervision over the Bank's operations. The organisation and the manner of operation of the Supervisory Board are set out in *the Rules of Procedure of the Supervisory Board of Bank Pekao S.A.* (hereinafter: *the Rules of Procedure*). Pursuant to the provisions of the *Rules of Procedure*, it comprises from seven to nine members appointed by the GMS for a joint term of office lasting three full financial years. As of 31 December 2025, the Supervisory Board comprised nine members, including seven men (71.4%) and two women (28.6%), with five members (55.6% of the composition of the supervisory body) independent. The ratio of Supervisory Board Members by gender (number of women relative to the number of men on the Supervisory Board) was 2:7. The Chair of the Supervisory Board is not part of the Bank's management staff; at the same time, none of the Supervisory Board Members belongs to under-represented social groups. In the previous reporting period, as of 31 December 2024, the Superivisory Board comprised eight members, including seven men (85,7%) and one woman (14,3%), with a ratio of 1:7.

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

AS AT THE DATE OF SUBMISSION OF THE REPORT FOR 2025	31.12.2025
Bogdan Benczak Chair of the Supervisory Board	**Bogdan Benczak** Chair of the Supervisory Board
Bartosz Grześkowiak Deputy Chair of the Supervisory Board	**Bartosz Grześkowiak** Deputy Chair of the Supervisory Board
Artur Nowak-Far Deputy Chair of the Supervisory Board	**Artur Nowak-Far** Deputy Chair of the Supervisory Board
Magdalena Joanna Dziewguć Secretary of the Supervisory Board	**Magdalena Joanna Dziewguć** Secretary of the Supervisory Board
Krzysztof Czeszejko-Sochacki Member of the Supervisory Board	**Krzysztof Czeszejko-Sochacki** Member of the Supervisory Board
Diana Dębowczyk Member of the Supervisory Board	**Diana Dębowczyk** Member of the Supervisory Board
Jacek Neścior Member of the Supervisory Board	**Jacek Neścior** Member of the Supervisory Board
Witold Walkowiak Member of the Supervisory Board	**Witold Walkowiak** Member of the Supervisory Board
Mariusz Jaszczyk Member of the Supervisory Board	**Mariusz Jaszczyk** Member of the Supervisory Board

The Supervisory Board performs its duties collectively and, to streamline its work or perform specific activities, may establish committees and teams from among its members. We have included a description of the key competencies and tasks of individual committees in the sustainability context in the section: Information provided to the administrative, management and supervisory bodies of the undertaking and sustainability-related matters addressed by them **[GOV-2]**.

Management Board of the Bank

The tasks of the Management Board of Bank Pekao (hereinafter: the Management Board) primarily include representing the Bank and managing the Bank's affairs. The scope of the Management Board's activities covers all matters not reserved to the powers of other bodies under *the Bank's Statute* or generally applicable provisions of law. The Management Board comprises from five to nine (executive) members, appointed for a joint term of office lasting three full financial years. As of 31 December 2025, the Management Board comprised 8 members, including 7 men (85.7%) and one woman (14.3%), which represents a ratio of women to men of 1:7. None of the members of the Management Board was a representative of employees and other persons performing work. In the previous reporting period, as of 31 December 2024, the Management Board comprised 6 members, including 5 men (80%) and one woman (20%), with a ratio of 1:5. In the previous reporting period, as of 31 December 2024, the Management Board comprised 6 members, including 5 men (80%) and one woman (20%), with a ratio of 1:5. As of 31 December 2025, a total of three women (21.4%) and fourteen men (78.6%) served on the Management Board and the Supervisory Board. The ratio of Management Board and Supervisory Board members by gender (number of women in relation to the number of men) was 3:14. In the previous reporting period, as of 31 December 2024, the Management Board and the Supervisory Board comprised of two women (16,7%) and twelve men (83,3%), what means the number of women to number of men ratio 2:12.

Suitability Assessment

We are obliged to apply the P*olicy for the selection of candidates for the function of a member of the Management Board and Key Function and for the suitability assessment of proposed and appointed members of the Management Board, the Supervisory Board and key function holders at Bank Polska S.A.* (hereinafter: *the Selection and Suitability Assessment Policy*), approved by the Supervisory Board on 30 December 2020. This regulation is intended to ensure a uniform, optimal process for selecting candidates for members of the Management Board. The candidate selection process, in line with the assumptions of *the Selection and Suitability Assessment Policy*, is intended to ensure the appointment to the Management Board of persons having the necessary knowledge, experience and skills and enjoying a good reputation.

The Selection and Suitability Assessment Policy also indicates the criteria for assessing the individual and collective suitability of candidates and members of the Management Board, the Supervisory Board and persons performing key functions at the Bank in the course of performing their functions. In addition, it defines events resulting in the need to carry out a suitability assessment, the course of the suitability assessment process, including roles and tasks in the process, and the effects of the assessment, which include remedial measures to be applied in order to ensure compliance with the suitability requirements.

All members of the Management Board and the Management Board as a whole were assessed by the Supervisory Board for compliance with the requirements referred to in Article 22aa of *the Act of 29 August 1997 – Banking Law* and the suitability requirements referred to in *the Selection and Suitability Assessment Policy.*

In 2025, we carried out in the Bank both initial and subsequent individual suitability assessments and collective suitability assessments of members of the Supervisory Board. In addition, we carried out suitability assessments resulting from changes in functions performed by members of the Bank's bodies.

Subsidiaries have implemented suitability assessment policies in accordance with applicable provisions of law.

Responsibility for the sustainability area

We are aware that a responsible approach to environmental, social and corporate governance issues (hereinafter: ESG) is an integral element of building the long-term value of our organisation. Therefore, we consistently integrate these aspects into our business strategy – *The Bank Pekao Strategy 2025-2027 ("...the only way is up!")* (hereinafter: *the Strategy*), while supporting our clients in their transformation towards sustainability.

When presenting the sustainability area, we are guided by transparency and the quality of disclosures; we ensure that actions are consistent with internal ESG policies. We seek to report in a clear, understandable manner, tailored to the needs of our stakeholders. We place particular emphasis on ensuring that communication – both external and internal – supports the understanding of our objectives and progress in implementing ESG commitments.

At the level of the Management Board and the Supervisory Board, we actively engage in setting strategic directions, including those related to the impact of our operations on our environment and the risks and opportunities related to ESG. We regularly analyse, and, where necessary, update and approve, key policies and internal control models in this respect. We also participate in the risk identification and risk management process, in particular in relation to risks associated with climate change.

We prepare periodic reports for the Management Board and the Supervisory Board on the implementation of *the Strategy*, including progress in achieving ESG objectives. Thanks to ongoing access to knowledge and the exchange of experience with sustainability leaders, we are able to continuously improve the quality of our actions and effectively respond to dynamically changing legal, economic and social conditions.

Our engagement also includes actions to develop human capital, support society, promote ethics in business and maintain the highest standards of corporate governance. In this way, we systematically strengthen our market position as an organisation that is responsible, aware of its role and well prepared for the challenges of a changing environment.

In the area of sustainability, we have introduced the following division of tasks among members of the Bank's Management Board:

- responsibility for ESG risk management lies with Marcin Gadomski - Vice-President of the Management Board supervising the Risk Management Division,
- responsibility for matters related to sustainable finance lies with Robert Sochacki - Vice-President of the Management Board supervising the Corporate Banking, Markets and Investment Banking Division and Łukasz Januszewski – Vice-President of the Management Board supervising the Enterprise Banking Division,
- responsibility for sustainability reporting (ESG reporting) lies with Dagmara Wojnar - Vice-President of the Bank's Management Board supervising the Finance Division.

ESG Council

The ESG Council, established by a resolution of the Bank's Management Board in 2020, is responsible for coordinating issues related to ESG, including sustainability reporting, and for supporting the Management Board.

The main tasks of the ESG Council (hereinafter: the ESG Council) include:

- approval of ESG documents (results of the double materiality assessment, the transition plan, self-assessment of compliance with ESG requirements),
- monitoring the management of impacts, risks and opportunities,
- setting directions for the development of sustainable banking products and services,
- analysing and providing opinions on ESG initiatives at the request of the Bank's organisational units,
- supervising progress and the consistency of communication activities throughout the organisation in the area of sustainability.

The Council comprises four members of the Management Board:

- Marcin Gadomski - Vice-President of the Management Board supervising the Risk Management Division. Chair of the ESG Council,
- Dagmara Wojnar - Vice-President of the Bank's Management Board supervising the Finance Division. Vice-Chair of the ESG Council,
- Robert Sochacki - Vice-President of the Management Board supervising the Corporate Banking, Markets and Investment Banking Division. Member of the ESG Council,
- Błażej Szczecki - Vice-President of the Management Board supervising Branch Distribution, Private Banking and Operations Division. Member of the ESG Council,

and representatives of the Bank's units key to ESG (both business and support).

Meetings of the Council are held at least once a quarter.

As part of supervising impacts, risks and opportunities, the ESG Council performs the following activities:

- identifying ESG impacts, risks and opportunities,
- reviewing and assessing ESG risks and opportunities, including determining the probability of ESG risks occurring and their potential impact on the Bank's operations, mitigation of such risks, as well as classification of opportunities taking into account the assessment of potential benefits arising from the identified ESG opportunities and their impact on the Bank's strategy,
- continuous monitoring: regular tracking of the identified ESG risks and opportunities and their dynamic changes.

Competencies of the Management Board and the Supervisory Board

Sustainability is a permanent focus and area of engagement for members of our organisation. Sustainability-related matters are consistently taken into account by the Management Board, the Supervisory Board and the Bank's senior management (understood as persons holding the most senior managerial positions below the Management Board), both in the process of setting strategic directions and as part of activities undertaken in line with adopted policies. More information on monitoring sustainability-related impacts, risks and opportunities can be found in the subsection *Information provided to the administrative, management and supervisory bodies of the undertaking and sustainability-related matters addressed by them* in section [Policies and action taken for IRO management].

Members of the Bank's management staff, comprising the Management Board and the directors of relevant units, have extensive competencies acquired through many years of professional practice, which enables them to take decisions in the area of sustainability. Within the organisational structure, they are responsible for individual E, S and G areas in line with their competencies and scope of responsibility. At the same time, ensuring that they systematically update their knowledge in line with applicable regulations and best market practices, they continuously develop their skills in this respect. In accordance with *the Training, Professional Development and Employee Development Activities Policy of Bank Pekao S.A.*, we ensure broad access to various forms of learning and professional development for members of the Bank's bodies (the Management Board and the Supervisory Board), in accordance with applicable rules – both at their request and at the request of an authorised unit.

Additionally, we support the participation of our representatives in external events (presentations, conferences) on the above topics and in training programmes dedicated to them.

In 2025, members of the Bank's bodies participated in the following sustainability training courses:

- ESG – sustainability,
- Prevention of and response to corruption.

The key groups of issues discussed during these training courses included, inter alia:

- ESG – the three pillars of sustainability,
- The importance of ESG in business,
- ESG in practice – what is worth knowing,
- What is corruption and why is it dangerous?,
- Risk areas and warning signals,
- Responsibility and good practices.

13.1.2.2 Information provided to the administrative, management and supervisory bodies of the undertaking and sustainability-related matters addressed by them [GOV-2]

Results of the double materiality assessment as a source of information on impacts, risks, opportunities

In 2025, we updated the double materiality assessment (hereinafter: DMA) in order to verify the key impacts, risks and opportunities resulting from our operations identified a year earlier. The DMA results obtained were presented to the Council at the meeting on 10 October 2025 and were then accepted and formally adopted on 15 October 2025. For more information on the double materiality assessment process itself and its results, please refer to [IRO-1].

Policies and actions taken for IRO management

In 2025, we implemented mechanisms in the Bank designed to structure processes related to sustainability reporting. Under these mechanisms, we defined the manner of defining impacts, risks and opportunities (hereinafter: IRO), managing them and monitoring them. In doing so, we took into account tasks and responsibilities of participants in the above process, including, inter alia: information flows, approval of work results, and decision-making by the Bank's bodies (the Management Board and the Supervisory Board) and the ESG Council.

We have set out these matters in the Procedure for sustainability reporting in the Bank Pekao Group (hereinafter: *the ESG Reporting Procedure*), which covers the following matters:

- rules, scope and responsibilities related to the preparation, verification and publication of the Sustainability Statement,
- rules, stages, participants, division of roles and competencies, and expected outcomes in the double materiality assessment process. In accordance with *ESG Reporting Procedure*, we designate the unit responsible for organising and coordinating the process, initiating each stage and consolidating information, resulting in a summary of the results of the impact assessment and financial materiality. Approval by voting and, accordingly, adoption of the double materiality assessment result by the ESG Council are the stage finalising the double materiality assessment process,
- a system and rules for managing impacts, risks and opportunities to ensure the Bank's sustainable operations in the environmental, social and governance area.

The identification and classification of impacts, risks and opportunities did not necessitate the creation of new, separate procedures. IRO management has been fully integrated into the Bank's existing management and control system, including the risk management system (also covering ESG risk), the internal control system and the strategic and operational planning framework. Topic owners and substantive units responsible for ongoing monitoring and reporting are involved in this process.

ESG risk is embedded in existing policies, procedures and risk assessment and monitoring mechanisms. As part of implementing CSRD and ESRS requirements, the manner of qualifying and reporting non-financial risks was specified in more detail, without creating separate procedures dedicated exclusively to IRO.

Environmental and social impacts are managed within existing operational, regulatory and compliance processes. Topic owners are responsible for the ongoing management of impact-generating activities, including their mitigation or enhancement, in line with applicable regulations and established Bank processes.

Opportunity management – particularly with respect to developing the green portfolio, new products and ESG innovations – is carried out within existing product and credit policies and business processes. No new, separate procedures dedicated to opportunities have been created.

The above IRO activities are consistent with the broader direction of change implemented in the Bank, one element of which is the adoption, in December 2025, of *the Transition Plan of the Bank Pekao Group* (hereinafter: *Transition Plan*). This Plan constitutes the implementation of the requirements of Article 76(2) CRD and was prepared in accordance with the requirements of Chapter 6 of the EBA Guidelines.

The overarching objective of the Transition Plan is to manage ESG risks identified by the Bank as material in the short-, medium- and long-term perspective, in line with the Pekao Group's overall business strategy and risk appetite, while the objectives and actions set out there in constitute a tool for active management of climate-related transition risk in the credit portfolio. The Transition Plan provides for 4 KPI reported to the Bank's Management Board and 44 KPI reported to the ESG Council.

More information on the Transition Plan can be found in the subsection [Transition Plan for climate change mitigation].

Sustainability information provided to the Management Board

In 2025, the Management Board received information – reports, covering mostly IRO elements such as, inter alia:

- arranging financing for new sustainable projects,
- supporting our clients' energy transition and the transition to a low-carbon economy,

- implementing a range of activities targeted at climate neutrality,
- ensuring employee development with respect for diversity and creating an attractive workplace as the foundation of our operations,
- reducing the gap between the average remuneration of women and men,
- education of society and raising environmental awareness,
- developing the Bank while maintaining high standards of corporate governance and an ethical approach to business.

Additionally, in the area of risk – in accordance with internally applicable regulations and established reporting processes – the Bank's Management Board is informed on a quarterly basis about:

- utilisation of the strategic limit for ESG risk at the level of the Bank and the Pekao Group,
- the level of implementation of KPI defined in the *Strategy*.

Certain IRO areas are also taken into account when supervising *the Strategy*, making decisions regarding risk management processes or decisions regarding major transactions, e.g. setting terms/limits for financing projects that have a positive impact on the environment. In executing these processes, the Management Board makes decisions that ensure an optimal balance between regulatory requirements, ESG-related risks, and overall organizational performance.

Sustainability information provided to the ESG Council

The ESG Council, in accordance with internally applicable regulations and reporting processes, is informed quarterly about the following matters:

- the level of key ESG risk indicators at the level of the Bank,
- the correctness of asset labelling for the purposes of calculating selected *Strategy* KPIs in the ESG area,
- implementation of *Strategy* objectives in the ESG area,
- monitoring of compliance with requirements.

In 2025, the main risk-related topics addressed by the ESG Council concerned:

- the results of monitoring strategic ESG risk indicators within the ESG risk management system for the exposures portfolio, with particular focus on transition risk related to greenhouse gas emissions in Scope 3, category 15 (Investments),
- information on disclosures published by the Bank concerning ESG risk.

In addition, the ESG Council assessed the implementation of strategic directional actions in the area of opportunities related to selected sustainability aspects, such as, inter alia:

- development of products and services supporting clients' transformation towards sustainability,
- building the Bank's image as a responsible institution supporting clients in their transformation,
- cooperation with industry organisations involved in sustainability, e.g. UNGC,
- management of the Bank's internal processes.

The ESG Council also received detailed information concerning:

- the results of the double materiality assessment together with material IRO,
- the current status of tasks in the area of sustainability reporting,
- addressing UKNF (Office of the Polish Financial Supervision Authority) expectations regarding supervisory expectations for commercial banks,
- the implementation status of a strategic project in the ESG area.

The ESG Council also receives, on an annual basis, information regarding the self-assessment of compliance with applicable ESG requirements. The self-assessment includes information on the degree of implementation of ESG aspects within the *Strategy*.

In October 2025, the ESG Council approved the list of IRO, which forms the basis for preparing this Sustainability Statement. In accordance with the rules of procedure of the ESG Council, which acts as an advisory body to the Management Board, the ESG Council was informed about the implementation of due diligence and about the results and effectiveness of managing material impacts, risks and opportunities (IRO).

Once a year, the ESG Council reviews the management of impacts, risks and opportunities related to the Group's activities. This review is based on information provided by units responsible for the areas in which material impacts, risks and opportunities were identified (as determined in the double materiality assessment). Data on results and the effectiveness of policies, actions, metrics and targets implemented in response to these impacts, risks and opportunities are also taken into account.

Sustainability information provided to the Supervisory Board and committees operating under the Supervisory Board

The Supervisory Board approves the Financial Statements and the Management Report, including the Sustainability Statement. The tasks of the Supervisory Board include appointing the Supervisory Board Audit Committee (hereinafter: the Audit Committee), the Supervisory Board Nomination and Remuneration Committee and the Supervisory Board Risk Committee, whose task is to monitor specific areas of the Bank's activities.

The Audit Committee is informed on sustainability issues not less than once a year, and supports the Supervisory Board in fulfilling its sustainability obligations by:

- monitoring the financial reporting process and the sustainability reporting process, as well as monitoring compliance with laws and procedures governing the Bank's operations,
- monitoring the results of the double materiality assessment as an element of the sustainability reporting process and their impact on the scope and content of non-financial disclosures,
- monitoring the effectiveness of internal control systems and risk management systems, and internal audit, in particular in the area of sustainability reporting,
- overseeing the process of performing statutory audit activities, in particular the audit or assurance of sustainability reporting carried out by the audit firm,
- controlling and monitoring the independence of the statutory auditor and the audit firm, in particular where the audit firm provides services to a public interest entity other than audit and assurance of sustainability reporting,
- informing the Supervisory Board of the results of the audit or assurance of sustainability reporting and explaining how that audit or assurance contributed to the reliability of financial reporting and sustainability reporting of the group in a public interest entity, as well as indicating the role of the Audit Committee in the audit or assurance process,
- performing other tasks set out in applicable provisions of law.

The Supervisory Board Nomination and Remuneration Committee supports the performance of the Supervisory Board's tasks by:

- submitting proposals regarding the setting of terms of agreements governing the employment relationship or another legal relationship between members of the Management Board and the Bank, including remuneration for members of the Management Board, as well as proposals regarding the approval of the policy on variable components of remuneration of persons holding managerial positions in the Bank in accordance with separate regulations, and for the purpose of submitting to the GMS proposals on the remuneration of members of the Supervisory Board,
- preparing recommendations regarding compliance with suitability requirements for the appointment of members of the Management Board and members of the Supervisory Board in accordance with separate regulations,
- preparing a report for the GMS on the assessment of the functioning of the remuneration policy in the Bank.

13.1.2.3 Incorporation of sustainability-related performance in incentive schemes [GOV-3]

Optimal management and oversight of the Bank's operations require us to take into account not only the present perspective, but also the strategic vision and possible scenarios of future scenarios, including challenges related to the sustainable transformation of the economy. For this reason, we have regulated the remuneration principles in the Bank by adopting the *Remuneration Policy of the Members of the Supervisory Board of the Bank and the Management Board of Bank Polska Kasa Opieki Spółka Akcyjna* (hereinafter: *the Remuneration Policy of the Members of the Supervisory Board and the Management Board*).

The Remuneration Policy of the Members of the Supervisory Board and the Management Board was prepared by the Management Board and subsequently approved by the Supervisory Board, following prior review by the Supervisory Board Nomination and Remuneration Committee and the Supervisory Board Risk Committee. This document is adopted by resolution of the GMS at least once every four years, and each material amendment requires re-adoption by way of a resolution.

The dedicated Supervisory Board Nomination and Remuneration Committee is responsible for reviewing and monitoring *the Remuneration Policy of the Members of the Supervisory Board and the Management Board* and supporting other Bank bodies in shaping and implementing it. The role of the Supervisory Board Risk Committee, in turn, is to assess whether the incentive system described in *the Remuneration Policy of the Members of the Supervisory Board and the Management Board* – and practice arising from it – takes into account the institution's risk, capital and liquidity as well as the likelihood and time horizon of generating profits.

In the remuneration strategy for members of the Management Board, we have adopted the objective of ensuring a competitive, transparent and effective pay system that supports the organisation's development, strengthens its financial stability and enhances credibility among a wide group of stakeholders. Accordingly, we engage individuals with high substantive qualifications, impeccable reputation and appropriate experience in the work of the Management Board. This gives us assurance that the organisation's operations are managed in accordance with corporate governance principles, legal provisions and supervisory requirements for the financial sector.

The objectives of *the Remuneration Policy of the Members of the Supervisory Board and the Management Board* are:

- supporting proper and effective risk management,
- not encouraging the taking of excessive risk beyond the overall acceptable level of risk approved by the Supervisory Board,
- implementing the Bank management strategy and the risk management strategy,
- supporting mechanisms for managing conflicts of interest occurring in the Bank's operations and limiting conflicts of interest,
- ensuring that remuneration and any related terms of employment that affect remuneration, including those concerning the terms for granting and paying remuneration, are gender-neutral, i.e. are not differentiated by gender.

The Remuneration Policy of the Members of the Supervisory Board and the Management Board specifies criteria (indicators) which, in a manner consistent with our long-term strategy, take into account: social interests and the Bank's environmental protection commitments, undertaking actions aimed at preventing adverse social effects of the Bank's operations and minimising or reversing them, as well as the strategy for incorporating sustainability risks into decision-making processes for investments.

In the Bank, we do not apply a separate variable remuneration indicator dependent solely on the achievement of ESG objectives. Nevertheless, for management purposes, a provision concerning compliance with regulatory ESG requirements is taken into account. This objective is based on the achievement of indicators, including, inter alia, TCR, Tier 1, LCR and NSFR, and constitutes part of a broader objective in the area of management and achieving synergies within the Pekao Group.

In 2025, objectives were not linked to the defined material impacts, risks and opportunities, and climate-related matters, including Scope 3 greenhouse gas emissions reduction targets, have not yet been reflected in variable remuneration.

Members of the Supervisory Board are entitled to remuneration in a fixed monthly amount and are not entitled to additional variable remuneration. Total remuneration of a member of the Management Board consists of a fixed component, being the basic monthly remuneration, and a variable component, being supplementary remuneration for the financial year. Variable remuneration of a member of the Management Board depends on the level of achievement of established management objectives (including, inter alia, increasing the Bank's value, improving economic and financial indicators) and may not exceed 100% of the fixed remuneration of that member of the Management Board in the previous financial year for which the amount of the variable remuneration due is calculated.

13.1.2.4 Due diligence statement [GOV-4]

In all its activities, the Pekao Group applies and continuously develops due diligence principles in accordance with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and banking sector regulations.

Due diligence is an ongoing process under which we identify and prioritise actual and potential adverse impacts on the environment, society and human rights, as well as take preventive and mitigating actions, monitor their effectiveness and report results. This process is an integral part of the *Strategy*, the business model and sustainability-related activities.

In the table below we present the elements of the due diligence process that we describe in the Sustainability Statement.

Elements of due diligence:

	KEY ELEMENTS OF THE DUE DILIGENCE PROCESS	POINTS IN THE SUSTAINABILITY STATEMENT
a)	Due diligence statement	GOV-2, GOV-3, SBM-3
b)	Interests and opinions of stakeholders	GOV-2, GOV-5, SBM-1, SBM-2, IRO-1, MDR–P, S1-2, S4-2, G1 -1, G1-3
c)	Description of processes used to identify and assess material impacts, material risk and material opportunities	IRO-1, SBM-3
d)	Actions and resources in relation to material sustainability matters	GOV-1, GOV-3, MDR–A, S1-3, S4-3, G1-1
e)	Monitoring the effectiveness of policies and actions using targets	GOV-3, MDR-T, MDR-M, S1-17, S4-4, G1-3

13.1.2.5 Risk management and internal controls over sustainability reporting [GOV-5]

In the Bank, we apply comprehensive internal assessment and control mechanisms designed to ensure high quality, reliability and compliance of sustainability reporting processes with applicable legal regulations and best market practices. These mechanisms enable us to exercise ongoing operational oversight over the process of collecting and verifying non-financial data, as well as over the periodic assessment of the effectiveness of procedures, tools and control mechanisms applied. In this way, we can not only increase the transparency, credibility and consistency of reported ESG information, but also support the achievement of the Bank's strategic objectives in the area of sustainability and respond to the growing expectations of regulators, investors and other stakeholders.

The document that governs the division of competencies and responsibilities applicable in the organisation in the preparation of the Sustainability Statement is the ESG Reporting Procedure, under which:

- quantitative and qualitative data are developed by relevant Bank employees indicated by the directors of the units responsible for a given matter,
- responsibility for the content of the qualitative and quantitative disclosures provided rests with the directors of substantive units and presidents of companies in the Pekao Group and authorised employees of substantive units responsible for a given disclosure scope,
- all data provided are verified for correctness and adequacy by employees of the unit responsible for preparing the Sustainability Statement,
- sustainability reporting is subject to assurance by a statutory auditor holding relevant qualifications,
- the final version of the report is reviewed and approved by members of the Management Board, the Audit Committee and the Supervisory Board.

Matters relating to sustainability reporting and, more broadly, reporting ESG metrics are also a standing agenda item of the ESG Council. Within its work, the status of preparation of the current sustainability statement is monitored, material challenges and risks related to the reporting process are reported and solutions are developed. Risk areas determine optimal internal control mechanisms designed to ensure completeness, quality and credibility of reporting data. Data are verified by managers responsible for individual areas, and the process covers both substantive and formal review. Information on progress throughout the report preparation process is regularly provided to the member of the Management Board supervising the Finance Division, including the unit responsible for preparing the sustainability statement. More information about the ESG Council is included in the subsection Roles of the administrative, management and supervisory bodies [GOV-1].

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

At the same time, to ensure appropriate oversight, internal audit carries out a detailed review of the reporting process each year, covering data verification, compliance with the adopted guidelines and the effectiveness of implemented procedures.

13.1.3 Bank's Strategy

13.1.3.1 Strategy, business model and value chain [SBM-1]

As the Bank, we actively participate in trading on domestic and international financial markets, carrying out transactions both in Polish zloty (zł – PLN) and in foreign currencies. Our operations comprise the following segments: corporate banking, private banking, asset management and brokerage services, under which we provide comprehensive financial services for individual and institutional clients.

We base the Bank's diversified offering on solid capital foundations and high liquidity, while maintaining rigorous risk management standards. Thanks to a wide range of products, innovative solutions and an individual approach to the client, we provide comprehensive financial service and products of the highest quality, flexibly adapted to changing client expectations.

We continuously strengthen our market position by focusing on key areas of business activity. The detailed scope of our domestic and foreign trading operations is specified in paragraph 6 of *the Bank's Statute.*

Business model

We base our business model on customer segmentation in areas such as:

- retail banking and private banking – serves individual clients, including affluent private banking clients, as well as micro-enterprises. We offer investment advisory services through private banking centres and remote channels to private banking clients, and we serve all individual clients and micro-enterprises via a network of branches and partner outlets, supported by remote service channels, including digital channels,
- enterprise banking – provides financial services to clients from the small and medium-sized enterprise sector, who are served by advisers with the support of product specialists. Service is provided in specialised Business Customer Centres, Corporate Centres and universal retail branches. We offer entrepreneurs products and services tailored to their individual needs, based on solutions proven in corporate banking,
- corporate and investment banking – provides financial services to large corporate clients, public sector entities, financial institutions and entities from the commercial real estate finance sector. We provide corporate and investment banking clients with service delivered by our advisers, supported by product specialists.

Revenues of the Pekao Group

In 2025, we recorded total revenues of the Pekao Group at the level of PLN 23,365.23 (compared to PLN 22,570.87 in 2024), resulting primarily from banking industry operations and activity in capital markets (mainly as part of banking operations). This year, we do not publish a quantified analysis of revenues by industries in which we operate due to the lack of published sector-specific ESRS standards.

YEAR	TOTAL REVENUES OF THE PEKAO GROUP (PLN MILLION)
2024	22,570.87
2025	23,365.23

Bank Pekao Strategy

We present our approach to sustainability and responsible business conduct in *The Bank Pekao Strategy 2025-2027 ("the only way is up!")*.

The Strategy is based on three pillars: WZROST (GROWTH), DOSTĘPNOŚĆ (ACCESSIBILITY) and SPRAWNOŚĆ (EFFICIENCY), within which we identify 9 strategic directions that we will follow in the coming years – within *the Strategy's* time horizon. During this period, we plan to dynamically increase our presence in key market segments and pursue stable financial performance and growing market shares. We will also focus on expanding remote service channels and on even better adapting our offering to evolving client expectations. In addition, we intend to invest in technological development, which will support building a modern organisational culture. Under the Strategy, we have assumed i.a. investing in future competencies by establishing the AI Competence Centre to accelerate the implementation of new technologies across the organisation.

GROWTH

Within the *Strategy's* time horizon, we plan to increase the customer base under the age of 26 to 1.4 million, which we intend to achieve by developing products for young clients and aligning the offering with their lifestyle, relationships and needs, as well as through marketing activities addressed to Young and their parents. At the same time, with existing clients in mind, we will work on actions intended to support the activity of Young and on preparing an offering that will enable them to manage their funds more efficiently in the context of saving for goals and will stimulate card transaction activity. In this way, we want to increase the base of active clients by 700 thousand within a three-year horizon.

We intend to use our presence in smaller towns even more effectively through a broad network of branches, which we regard as our asset – a competitive advantage

At the same time, we focus on insurance products. By leveraging the partnership with the PZU Group, we aspire to achieve a leading position in the bancassurance market (insurance banking – i.e. offering bank insurance products (e.g. life, property, credit) directly in its outlets, often in connection with banking products). To this end, we will work on creating a strong line of standalone insurance, available outside banking products, and on implementing a system enabling fully remote purchase and management of insurance. Our objective also includes developing leasing and factoring. By drawing on the competencies of the entire Pekao Group, we plan to rank in the TOP3 in terms of providing these services. Through appropriate positioning, automation and streamlining of processes, we will be able to offer them to entrepreneurs even more effectively.

Moreover, within the GROWTH pillar, we assume achieving and maintaining the leading position in corporate banking and banking for the public sector. We plan to actively leverage the economic situation by increasing the number of financed large transformational projects. We will focus efforts on forecasting clients' needs in priority sectors and modifying decision-making processes to ensure the most efficient financing of strategic clients.

ACCESSIBILITY

We intend to expand the availability of our banking services by implementing an integrated service system across client contact channels. Our objective is to ensure ease and an individual approach, irrespective of the transaction execution method chosen by the client. Within the current strategic horizon, we also plan to develop interactive functions of the PeoPay application, the Pekao24 platform and the Contact Centre, introducing advanced conversational banking at the highest level. In line with the *Strategy*, we assume that by 2027 the number of mobile users will increase to 4.4 million and digital sales will account for 72% of total transactions. In addition, we will strive to increase engagement in educational activities and in advisory services delivered in branches, with particular emphasis on the needs of local communities.

In addition, to ensure positive customer experience, we set ourselves the objective of achieving a top three position in terms of the NPS indicator in mass segments by 2027. To achieve this, we consistently develop systematic monitoring of customer satisfaction, improve a flexible service model tailored to changing expectations, and simplify communication and increase the intuitiveness of our digital solutions.

EFFICIENCY

Implementing the changes for clients assumed under *the Strategy* requires strong technological infrastructure. To this end, we will create an effective data ecosystem that will streamline business processes, enable the generation of additional synergies and become the foundation of a new model of information management based on data, the so-called Data Driven. Under *the Strategy*, we assume more than a threefold increase in the number of systems operating in the cloud.

We will also simplify our internal procedures and implement a comprehensive Operational Excellence Model in order to continuously monitor and optimise processes. Optimisation activities will focus mainly on the entrepreneur segment, where key processes for companies, including the credit process for micro-entrepreneurs, will be digitised and automated. Over the next three years, we plan to increase the share of remote channels in sales of business loans to 30% and achieve a digitisation rate in the SME, MID and corporate segments at the level of 70%.

All these changes will be supported by a modern organisational culture, which will enable us to operate more efficiently and more ambitiously. We will also invest in developing future competencies by establishing the AI Competence Centre, which will accelerate the rollout of new technologies across the organisation. We assume that thanks to these actions, within three years the work efficiency in selected areas will increase by at least 10%, the number of implemented solutions based on artificial intelligence will increase by more than twofold, and the indicator of employees using AI will be 80%.

Mission, vision and values

In 2025, we updated our *Strategy* with new values that reflect the development of our organisational culture. The existing values: PROSTO (STRAIGHTFORWARDLY), RAZEM (TOGETHER), ODWAŻNIE (BOLDLY) and ODPOWIEDZIALNIE (RESPONSIBLY) were joined by: Z DETERMINACJĄ (WITH DETERMINATION), OTWARCIE (OPENLY) and UCZCIWIE (HONESTLY).

We defined a new Mission: **"Z Tobą przez całe życie" (With You Throughout Life)**, which expresses our ambition to accompany clients at every stage – from opening their first account, through making key financial decisions, to the development of local enterprises and successes in international markets.

Our new Vision: **"Pierwszy wybór na dziś i jutro" (The First Choice for Today and Tomorrow)** underlines our aspiration to be a reference bank – a universal and trusted financial partner in Poland.

As the Pekao Group, we also strive to be a leader in modern financial technologies, which we will pursue by supporting clients at every stage of their lives and by creating a working environment where employee engagement and development translate into high quality of service and positive customer experience.

ESG objectives – reflection of IRO in the Bank Pekao Strategy

In the Strategy, we defined strategic objectives taking into account ESG aspects covering matters that we considered important as a result of the double materiality assessment updated for sustainability reporting purposes in 2025.

Individual sustainability commitments have been appropriately assigned to three groups of matters in the following areas:

- Environment:

– achieving climate neutrality of the entire Pekao Group by 2050,

– developing products and ways of cooperating with clients that will support the sustainable transformation of business,

– allocating PLN 9 bn over the next three years to financing green projects such as: renewable energy sources, low-emission transport, energy-efficient construction, or actions aimed at improving energy efficiency.

- Social matters:

– increasing the share of women in the most senior management positions – our objective is for women to hold at least 33% of such positions. We consider the most senior management positions to be Directors of Divisions, Centres and Departments reporting directly to members of the Management Board, having knowledge of risks related to the Bank's operations and making decisions affecting risk (in line with the definition of senior management included in the "Policy for Identifying Managerial Positions in Bank Polska Kasa Opieki Spółka Akcyjna", excluding members of the Management Board). The target date for achieving this objective is 2027, and the level achieved in 2025 was 29%,

– maintaining the difference in remuneration in comparable positions below 5%, understood as the adjusted pay gap. The adjusted pay gap is calculated as a weighted average for employee sub-groups, taking into account grading levels, job families and the division in which a given employee is employed. The indicator is calculated based on total remuneration. The Bank uses the Korn Ferry/Hay methodology (levels and job families) under which it compares the remuneration difference. In accordance with the definition agreed with KNF, annual remuneration is taken into account when calculating the pay gap; therefore, the indicator is monitored on an annual basis. The target date for achieving this objective is 2027, and the level of the pay gap in 2025 was 0.95%,

– maintaining a high level of employee engagement,

– maintaining the level of activity in the field of volunteering and the Bank's presence among local communities,

– in the sphere of relations with clients, we assume strengthening our engagement in educational campaigns for clients.

- Corporate governance:

– building and strengthening ESG competencies in the Bank through extensive training programmes profiled in accordance with competencies,

– developing a tool used for risk management within ESG risk analysis and assessment in client relationships.

In work on ESG objectives, we included our key stakeholders: employees, clients, business partners and shareholders – both at the objective-setting stage and in the very process of analysing their expectations and opinions. Strategic objectives – including those relating to actions taken towards clients – are defined as part of the strategic planning process. It is based on macroeconomic assumptions and forecasts for the development of the banking sector. On this basis, Strategic Directions of Development of the Bank and the Pekao Group are formulated and the *Strategy* is developed, reflecting the Bank's long-term development ambitions, consistent with the risk profile determined by the Statutory Bodies. All key organisational units are involved in the process of preparing the Strategy. Incorporating ESG matters into the *Strategy* increases the credibility and competitiveness of our organisation and enables better risk management and responding to the expectations of investors, clients and regulators. Through the Strategy formulated in this way, we indicate that sustainability matters constitute an integral element of our business model, and even a priority in our approach to financing environmental initiatives and complying with social and corporate standards.

The achievement of our ESG objectives has a direct bearing on the Bank's offering and the manner of client service. We incorporate sustainability criteria into product processes, credit policy and risk management, which affects the development of financing for green investments, the implementation of ESG risk assessment tools in client relationships and the creation of solutions supporting business transformation. In the area of relations with clients and local communities, we strengthen educational activities, and, as part of cooperation with suppliers, we promote ethical standards and responsible practices.

The level of implementation of the *Strategy*, including individual ESG objectives, is systematically monitored by the *Strategy* Department and reported to the Management Board. Monitoring of strategy implementation, including achieved levels of strategic indicators (KPI) of individual business areas and progress in implementing strategic initiatives, is carried out quarterly to the Management Board and annually to the Supervisory Board Risk Committee and to the Supervisory Board. The results are not validated by external entities other than the assurance provider. The setting of strategic objectives and their updates take place with due regard to stakeholder expectations, including those of regulators.

As part of sustainability reporting, we also monitor and report the share of sustainable finance in the Bank's assets under the GAR indicator (defined under the EU Taxonomy Regulation and relevant delegated regulations). More on this in the chapter [EU Taxonomy].

Actions to implement the Sustainable Development Agenda

In pursuing sustainability, we focus on six UN sustainable development goals. These goals reflect our impact on key stakeholder groups and are consistent with the impacts, risks and opportunities identified in the double materiality assessment. At the same time, they remain fully aligned with the Bank's strategy, supporting the achievement of its long-term business and social objectives.

UN GOAL	LINK TO THE STRATEGY AND IRO
4 QUALITY EDUCATION	**IRO:** 1. ESRS S1: Own workforce – Equal treatment - Training and skills development of employees Impact: positive, actual - ensuring adequate access to training and encouraging employees to expand competencies 2. ESRS S4: Consumers and end-users – Impacts on consumers or end-users related to information - Privacy Impact: positive, actual - proactively ensuring an increase in clients' awareness and knowledge in the area of cyber security **Link to *the Strategy:*** Strengthening engagement in educational actions for clients - we conduct educational activities addressed to all our clients in the cyber security area, including, inter alia, by organising workshops and publishing reports related to security and privacy in the online environment.
5 GENDER EQUALITY	**IRO:** ESRS S1: Own workforce – Equal treatment - Gender equality and equal pay for work of equal value Impact: positive, actual - creating a friendly working environment and preventing discrimination **Link to *the Strategy*:** 1. In comparable positions, remuneration difference in the Pekao Group < 5%. 2. Increasing the share of women in the most senior management positions – our objective is for women to hold at least 33% of such positions.
8 DECENT WORK AND ECONOMIC GROWTH	**IRO:** 1. ESRS S1: Own workforce – Working conditions - Adequate pay of employees Impact: positive, actual: competitive and fair remuneration principles 2. ESRS S1: Own workforce – Working conditions - Social dialogue; Freedom of association, the existence of works councils and the rights of employees to information, consultation and participation; Collective bargaining, including the percentage of employees covered by collective agreements Impact: positive, actual: promoting internal communication and taking employee voice into account 3. ESRS S1: Own workforce – Working conditions - Occupational health and safety (OHS) Impact: positive, actual: ensuring ergonomic workplaces and caring for employees' mental health 4. ESRS G1: Business conduct – Whistleblower protection **Link to *the Strategy*:** Maintaining a high level of employee engagement
10 REDUCED INEQUALITIES	**IRO:** ESRS S4: Consumers and end-users – Social inclusion of consumers or end-users - Non-discrimination; Access to products Impact: positive, actual - ensuring the availability of financial services for clients from different social groups Opportunity: Actions to ensure service availability, such as developing digitalisation, simplifying access to banking or standardising telephone service, enable us to reach a wider group of clients. They facilitate contact with the Bank, increase customer satisfaction and support acquisition of new clients, which translates into revenue growth potential. **Link to *the Strategy*:** 1. Maintaining a high level of employee engagement - we create a work environment friendly to persons from communities vulnerable to discrimination (e.g. due to age, gender, disability, sexual orientation, religion, political beliefs, etc.). 2. Accessibility: The client and service quality at the centre of our attention, to make contact with the bank a friendly experience. The Bank systematically improves client service processes and the development of remote and mobile channels, with particular focus on their ergonomics and accessibility. "Accessibility", as one of the three pillars of the Bank's Strategy for 2025–2027.

3. In comparable positions, remuneration difference in the Pekao Group < 5%.
4. Increasing the share of women in the most senior management positions – our objective is for women to hold at least 33% of such positions.
5. Maintaining the level of activity in the area of volunteering and the Bank's presence among local communities.

IRO:

ESRS E1: Climate change – Climate change mitigation

Impact: positive, actual – financing low-emission investments

Opportunity: We see the opportunity to increase revenues related to offering financial products supporting the reduction of GHG emissions and accelerating the transition of the Bank's clients to a low-carbon economy. We build client awareness of such products and a positive image of the Group as an organisation supporting low-emission solutions.

Link to *the Strategy*:

1. Achieving climate neutrality of the Pekao Group by 2050.
2. Financing green projects in the amount of PLN 9 bn.
3. Developing products and a model of cooperation with clients supporting the sustainable transformation of business operations.

IRO:

Impact: positive, actual - implementation of ethics / ESG principles for suppliers

1. ESRS G1: Business conduct – Corruption and bribery

Impact: positive, actual- proactive anti-corruption measures, educational activities

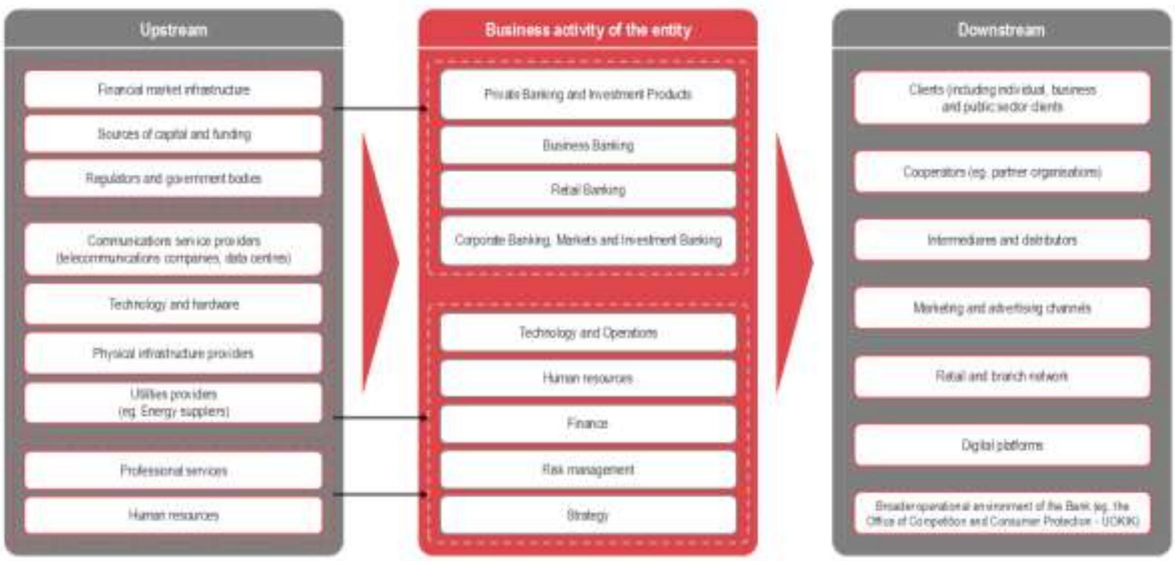
Value chain

In light of EFRAG guidelines, we classify the Bank's activities into one segment, i.e. the sector: banking in the macro-sector: financial institutions. In the value chain mapping process, we took into account the following criteria:

- value chain element,
- type of element of the chain,
- entity implementing the element,
- indication of 3 main entities or categories for each element,
- geographical location of main entities,
- indication of ESG topics material for a given value chain element.

Then, based on expert judgement, the value chain of the Pekao Group was developed, taking into consideration the level of complexity of internal processes, regulatory and technological requirements, and the multiplicity of services and client segments.

Pekao Group value chain



Our Bank's value chain comprises three levels:

- UPSTREAM of the value chain, which includes key elements of financial infrastructure, such as:
- – payment systems, clearing houses and depository systems,
- – cooperation with international payment card networks (Visa, Mastercard), technology and infrastructure providers and utilities service providers, as well as telecommunications companies.

Within UPSTREAM, we ensure business continuity, reliability and availability of services provided, as well as modern user-friendly solutions;

- ORGANISATION (the entity's sector operations) is a system of banking services that includes:
- – retail banking,
- – servicing of enterprises,
- – corporate banking,
- – capital markets,
- – investment banking.

We base the activities undertaken at this level on strong foundations in risk management, finance, human resources and strategy. Within ORGANISATION, we strive to ensure continuous development of both technology and operations as well as employee competencies, and to build an organisational culture.

- DOWNSTREAM of the value chain is focused on servicing diverse customer groups:
- – individual clients use personal banking services, loans and savings accounts,
- – public sector clients, including governments and local authorities, can rely on support in public finance management and arranging bond issues,
- – corporate clients and enterprises have access, inter alia, to commercial loans, treasury services and transaction servicing,
- – Group clients, including:
    - o individual clients using TFI products (investment funds),
    - o corporate clients using factoring services, leasing services and other business finance products.

DOWNSTREAM also includes our financial counterparties, including other banks and supranational institutions. Activities we undertake at this level are supported by advanced digital platforms, a professional distribution network and marketing channels.

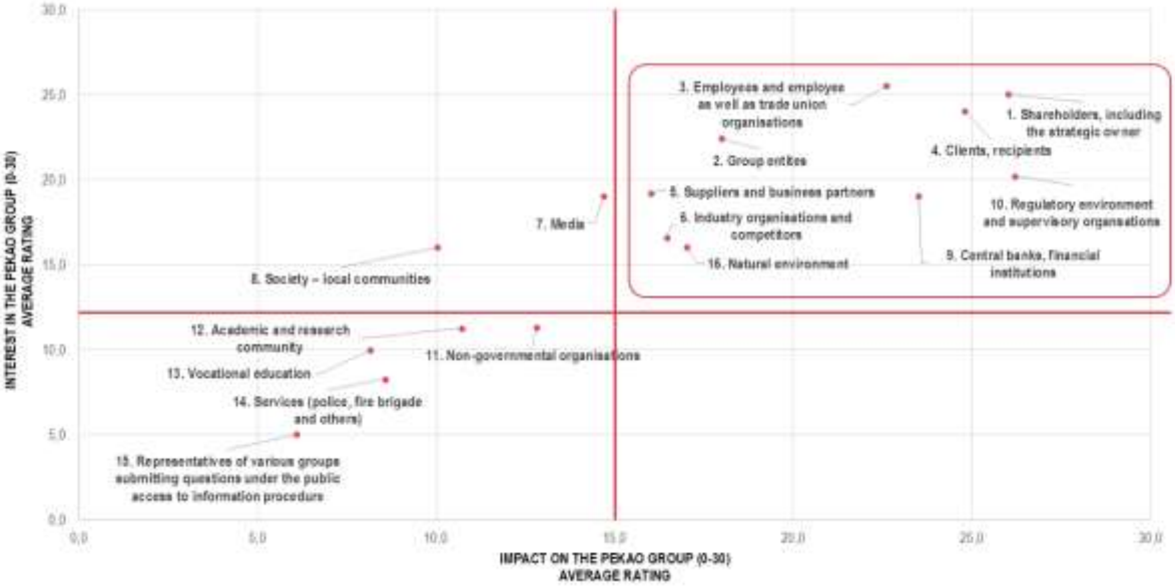
13.1.3.2 Interests and opinions of stakeholders [SBM-2]

In the Pekao Group, we treat our relationships with stakeholders as a priority. We ensure continuous dialogue with groups key to our business from the external and internal environment, which we conduct, inter alia, in the form of direct conversations or interviews as part of satisfaction or engagement surveys. This enables us to obtain information about our offering, the manner and quality of service, as well as to monitor current market trends and identify the needs and expectations of market participants.

We use various forms of communication, ensuring equal access to high-quality information for all stakeholders. The way we communicate with the external environment is governed, inter alia, by *the Principles of the Bank Pekao Information Policy for Contacts with Investors and Securities Market Analysts, the Media and Clients*, available on **[the website]**.

In 2024, for the first time, we identified our stakeholders and grouped them into specific categories for sustainability reporting purposes in accordance with CSRD and the ESRS Regulation. For this purpose, we first carried out sector classification and then developed a tool for mapping the Pekao Group's value chain in the area of credit institution activities. As a result of this process, a list of stakeholders was created and submitted for assessment by eighteen business units operating in the Pekao Group. Ultimately, after integrating and analysing the collected information, we identified key stakeholder groups, as shown in the chart below.

Stakeholder map of the Pekao Group:



In 2025, we maintained the existing business model and key stakeholder groups, which means that the stakeholder map remained unchanged compared to 2024 – the first year of applying ESRS requirements. Due to the absence of material changes in the structure and environment of the Pekao Group, there was no need to conduct additional consultations or modify the double materiality assessment process. We maintained the existing approach, considering it adequate to the current conditions.

As part of the double materiality assessment, we conducted consultations with stakeholders (both within the organisation as well as in the upper (upstream) and lower (downstream) parts of the value chain) on the Pekao Group's impact on the environment in terms of sustainability matters indicated in the ESRS Regulation. In the consultation process, we used a survey that enabled stakeholders to submit any additional remarks in open questions. The survey contained a total of 42 questions from the following categories: general (1), environmental (18), social (14) and corporate governance (5), as well as an open question. Respondents were divided into 2 groups: internal stakeholders, including employees and subsidiaries (78%), and external stakeholders (22%). Persons who were not employees, constituting own workforce, did not participate in the survey. The task we set for consultation participants concerned identifying and determining impacts in the ESG areas and assessing them as positive or negative. Stakeholders indicated the strongest positive impact in the social area and the strongest negative impact in the corporate governance area.

With respect to the identified impacts of the Pekao Group on the environment, and in particular in order to maximise positive and minimise negative impacts, we undertake activities involving key stakeholders. A list of these activities by individual groups is presented in the table below.

STAKEHOLDER GROUP	COMMUNICATION TOOL	TOPICS ADDRESSED	BANK'S ACTIONS
Shareholders, including the strategic owner (1)	General Meeting of Shareholders Conferences and meetings Stock exchange and press releases Financial reports, data summaries and results presentations The Bank's website and online information channels Meetings with rating agencies Ongoing cooperation of the Investor Relations Department (institutional and individual investors, financial analysts and capital market organisations) Online ESG report Branches, online and mobile banking	Strategy implementation, value creation, organisational changes Macroeconomic and market forecasts	Transparent actions, convenient and effective access to information about the Bank and its activities Application of external regulations and market standards Cooperation with the media – responding to enquiries Media statements, interviews, appearances and publications by members of senior management and selected experts of the Pekao Gr
Customers and recipients (4)	The Bank's website and online information channels Online banking platform Helpline Complaints Surveys of satisfaction with products and services and service quality Advertising campaigns and marketing activities Product offers, mailings Internal communication Meetings in branches and Bank outlets	Security of entrusted funds Ease of communication with the Bank	Offering competitive, high-quality products and services tailored to clients' needs Providing clear, comprehensible information, including by use of plain language principles Ensuring many diverse channels of access to products and services and information about the Bank's products and services Transparent offer and contract terms Obtaining customer feedback Participation in the process of establishing and complying with good practices and advertising standards for financial services
Employees and employee/trade union organisations (3)	Intranet, chats, discussion forums Meetings with participation of the Management Board Employee volunteering Webinars Employee appraisal Internal publications Thematic surveys, evaluation surveys, employee opinion survey Whistleblowing reporting system Meetings with employer representatives, negotiations, consultations	Employment stability and opportunities for professional development Market-based, competitive remuneration system Employee matters as one of the Bank's strategic objectives Transparent organisational structure Work-life balance Provisions of CA Employee matters Detailed information on social partners is available on individual intranet pages. Trade unions	Collecting and analysing employee opinions (chats, ability for employees to submit enquiries) and providing employees with feedback on topics raised by employees Transparent, non-discriminatory employee appraisal process taking into account employee engagement and achievements Employee development opportunities (promotions, product training and soft skills training), Collecting and analysing employee opinions (satisfaction surveys) and providing employees with feedback on topics concerning aggregated satisfaction survey results

STAKEHOLDER GROUP	COMMUNICATION TOOL	TOPICS ADDRESSED	BANK'S ACTIONS
	Meeting with suppliers, negotiations Newsletters	Works Council Social Labour Inspectorate	Setting employees clear, measurable targets to be achieved and monitored Adequate pay and benefits policy taking into account market trends as well as individual employee engagement and achievements Meetings with employees and ongoing communication with employees Ensuring a friendly workplace: including the possibility of remote work and health promotion and preventive actions Dialogue with all trade union organisations operating in the Bank
Regulatory environment and supervisory organisations (10)	E-mail Statements, reports Trade and business platform	Compliance with requirements and regulations Supporting the development of new market rules, including good practices – participation in consultation processes, e.g. with the involvement of the ZBP (Polish Bank Association)	Ongoing monitoring of legislative changes, the supervisor's approach, requirements, regulations and good practices; ongoing cooperation with Regulators
Central banks, financial institutions (9)	E-mail Statements, reports	ESG matters in the financial system and the banking sector	Dialogue and cooperation with stakeholders Exchange of experience Shaping good market practices
Entities of the Pekao Group (2)	Telephone, e-mail Meetings	Implementation of policies and procedures at Group level	Cooperation in the exchange of experience and implementation of good practices
Suppliers and business partners (5)	Procurement platform, telephone, e-mail ESG form Ongoing cooperation and contract performance Charitable and sponsorship activities, climate actions	Transparent principles of selection and cooperation with suppliers	Application of transparent supplier selection procedures Timely performance of contract provisions Promoting good procurement practices
Industry organisations and competitors (6)	Communication on the Bank's website and online communication channels Non-financial reports	Results, implementation of objectives and business strategy Initiatives undertaken and legislative and business projects implemented supporting the green transformation	Monitoring market changes in order to develop good practices Trend analysis Participation of Pekao Group representatives in meetings of industry organisations
Natural environment (16)	Internal communication channels	Social and environmental projects Reducing adverse impact on the environment, environmental education of Customers and Employees	`Encouraging employees to participate in pro-environmental initiatives Promoting behaviours and attitudes aimed at limiting adverse impact on the environment among employees

New business and ESG strategy

Changes in the regulatory environment related to sustainability, implementation of supervisory institution recommendations, observation of market practices, as well as growing stakeholder expectations (including those of investors and clients) require us to systematically increase engagement in ESG matters, including, inter alia, adapting internal procedures and incorporating ESG matters into product, credit and investment processes. Hence our decision to include these matters as an integral part of the Pekao Group's development activities in *the Strategy* published in 2025.

It was equally important for us to incorporate in the document the voices of our stakeholders, whose opinions we considered as guidance in defining strategic objectives for the coming years. In this way, with the involvement of many Bank units, including the Management Board, the final shape of *the Strategy* was approved by the Supervisory Board.

13.1.3.3 Material impacts, risks and opportunities and their interrelationships with the strategy and the business model [SBM-3]

The double materiality assessment (DMA) carried out in the previous reporting year provided material information that enabled us to better understand the impact of the Pekao Group's activities on the environment and society, as well as to assess how these factors translate into business opportunities and potential financial risk. Building on the results of this analysis, we were able to define development directions more accurately and determine the shape of policies and actions intended to ensure sustainable growth, financial resilience and the Group's responsible operation in a changing market and regulatory environment. We assumed that *the Strategy* is to respond to environmental and social challenges and, at the same time, enable full utilisation of emerging development opportunities. Detailed information on priorities and the approach in the new strategic perspective is provided in SBM-1.

We understand the interests and opinions of key stakeholders through the process of identifying and analysing their expectations as part of the materiality assessment and due diligence. We use the information obtained in these processes to incorporate stakeholders' perspectives into our strategy and business model, in particular regarding sustainability-related impacts.

We inform the Bank's administrative, management and supervisory bodies about the opinions and interests of key stakeholders in relation to our sustainability-related impacts. We provide this information as part of the adopted reporting and internal communication processes, enabling stakeholders' perspectives to be taken into account in strategic decision-making and ensuring effective oversight of the achievement of ESG objectives.

As part of the impact assessment, we considered a breakdown into:

- type of impact (positive/negative),
- place where the impact occurs (value chain (mainly through the loan portfolio) / organisation),
- timing of the impact: actual (currently occurring) / potential (may occur in the future), and across three-time horizons covering the following periods:

– short (1 year),

– medium (from 1 to 5 years),

– long (over 5 years).

We carried out the financial materiality analysis in relation to opportunities and risks for the business model, value chain, strategy and decision-making process across:

- three-time horizons covering the following periods:

– short (1 year),

– medium (from 1 to 5 years),

– long (over 5 years, in particular at least 10 years for the analysis of the materiality of risks – in accordance with the EBA Guidelines on ESG risk management),

- with a breakdown by the place where the impact occurs (value chain (mainly through the loan portfolio) / organisation).

The table below presents the most important impacts, risks and opportunities that we identified as part of the update of the double materiality assessment in 2025.

Material impacts, risks and opportunities and their interrelationships with the strategy and the business model

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
ESRS E1: CLIMATE CHANGE							
Climate change mitigation	N/A	**Positive, actual: financing of low-emission investments** In *the Strategy*, we set objectives supporting sustainable transformation: financing green projects in the amount of PLN 9 bn and developing products and a model of cooperation with clients. We finance investments in renewable energy sources, projects improving energy efficiency and innovative technologies that contribute to reducing greenhouse gas emissions, supporting the transition to a low-emission economy. As part of general financing, we have a portfolio of financial assets assessed in terms of EU Taxonomy KPI reported by the Pekao Group's clients. Environmentally sustainable assets due to the CCM objective (climate change mitigation) constitute most of the GAR numerator compared to the other six environmental objectives. **Impact linked to *the Strategy***	Downstream	Short Medium Long	**Opportunity** We see the opportunity to increase revenues related to offering financial products supporting the reduction of GHG emissions and accelerating the transition of the Bank's clients to a low-carbon economy. We build client awareness of such products and a positive image of the Group as an organisation supporting low-emission solutions.	Downstream	Short Medium Long
Climate change mitigation	N/A	**Negative, actual: financing of activities generating GHG emissions, including high-emission investments** The foundation of our business model is financing clients' business activities, commercial and residential real estate and vehicles, which involves financing GHG emissions resulting from these activities/objects. **Impact linked to *the Strategy***	Downstream	Short Medium Long	**Risk** In the ESG risk materiality analysis carried out in 2025, the Bank identified, inter alia, as material transition (transformational) risk related to climate in the credit risk of the portfolio – relating to a potential decrease in the debt servicing capacity of high-emission entities as a result of increased regulatory costs and demand shifts towards a low-emission economy. Potential concentration of exposures in such sectors increases concentration risk and the simultaneous materialisation of credit losses. This is because it is a risk closely linked to financed exposures, which in turn may be particularly exposed to the process of adjusting	Downstream	Long

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
					the economy to regulatory objectives related to ESG risk, and in particular to EU climate policy.		
ESRS S1: OWN WORKFORCE							
Working conditions	Secure employment conditions for employees	**Positive, actual: employment stability due to the use of employment contracts – mostly open-ended contracts** We exert a positive impact on employment security – most employees are employed under an employment contract. At the same time, we respond to market needs and changing expectations, also in terms of employment flexibility; therefore, we enable the conclusion of various types of contracts, including fixed-term and open-ended employment contracts, civil law contracts (contract for specific work and contract of mandate), as well as consultants under body leasing. The turnover rate was 10.52%. The average length of service was 15 years in 2025, which demonstrates long-term and stable employee relationships as regards remaining in an employment relationship with the Bank. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Working conditions	Secure employment conditions for employees	**Negative, potential: uncertainty as to employment stability due to the development of AI systems within the organisation** Among the Pekao Group's objectives set out in *the Strategy* 2025–2027, the development of the use of AI systems has been included, which may generate employee concerns about the stability of their employment (e.g. due to a lack of competencies to operate AI systems or the transfer of tasks performed to an AI system). Over the longer term, this may also result in an actual adverse impact in the form of employment reorganisation within the Pekao Group. In 2025, there were no collective redundancies related to AI.	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
		Impact linked to *the Strategy*					
Working conditions	Adequate pay for employees	**Positive, actual: competitive and fair remuneration principles** The remuneration policies we have implemented are intended to ensure fair and competitive remuneration and equal pay for work of the same quality regardless of an employee's individual characteristics. We continuously monitor market benchmarks for remuneration in the banking sector and ensure competitive remuneration conditions in the market. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Working conditions	Working time of employees Work-life balance of employees	**Positive, actual: compliance with the "right to be offline" and the use of flexible forms of employment in terms of working hours** We enable our employees to use flexible working hours, hybrid work and remote work. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Working conditions	Social dialogue Freedom of association, existence of works councils and employees' rights to information, consultation and participation Collective bargaining, including the percentage of employees covered by collective agreements	**Positive, actual: promoting internal communication and taking employees' voices into account** Trade unions operate in the Bank. As part of various forms of dialogue with employees, we provide our employees with the opportunity to express their views on matters that are important to them, inter alia, through the job satisfaction survey and through the possibility of submitting projects or suggestions. The Bank, as far as possible, implements selected suggestions and remarks from surveys. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
Working conditions	Occupational health and safety (OHS)	**Positive, actual: ensuring ergonomic workplaces and caring for employees' mental health** We provide our employees with ergonomic workplaces; we organise training on mental health and reduction of occupational stress, which helps to reduce burnout. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Equal treatment	Gender equality and equal pay for work of equal value	**Positive, actual: creating a friendly working environment and preventing discrimination** We create a working environment that is friendly to people from communities vulnerable to discrimination (e.g. due to age, gender, disability, sexual orientation, religion, political beliefs, etc.). **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Equal treatment	Gender equality and equal pay for work of equal value	**Negative, actual: existence of a gender pay gap between women and men** A gender pay gap exists in the Pekao Group between women and men. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Equal treatment	Training and skills development for employees	**Positive, actual: ensuring adequate access to training and encouraging employees to expand competencies** We deliver educational programmes that include local training and general development webinars, as well as international training and programmes, mentoring, internal and external coaching, and certification training such as CFA/ACCA/CIA. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
Equal treatment	Measures to prevent violence and harassment in the workplace Diversity in the workplace	**Positive, actual: training and reporting channels to counter violence and harassment** We have grievance mechanisms for employee matters, including violence and harassment in the workplace. We provide channels for reporting unethical actions, including violence and harassment. We actively train our staff in recognising workplace bullying, discrimination and undesirable behaviours, and in responding to all forms of these phenomena. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
ESRS S4: CONSUMERS AND END-USERS							
Information-related impacts on consumers or end-users	Privacy	**Positive, actual: proactive management of the security of customer data** We ensure the security of our clients' data and funds by implementing personal data protection training and monitoring its effectiveness. We invest in the latest cybersecurity technologies and the development of data security expert competencies, which improves data protection and translates into increased customer trust. **Impact linked to *the Strategy***	Organisation Downstream	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Information-related impacts on consumers or end-users	Privacy	**Negative, potential: harm to consumers and end-users due to significant/critical incidents of data leakage, theft or loss** We assume the possibility of potential large-scale data leaks, theft or loss – i.e. relating to a certain pool of clients, for example in the event of a hacking attack or a failure of banking systems.	Organisation Downstream	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
		Impact linked to *the Strategy*					
Information-related impacts on consumers or end-users	Privacy	**Positive, actual: proactive efforts to increase customer awareness and knowledge of cybersecurity** We conduct educational activities addressed to all our clients in the cyber security area, including, inter alia, by organising workshops and publishing reports related to security and privacy in the online environment. **Impact linked to *the Strategy***	Organisation Downstream	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Social inclusion of consumers or end-users	Responsible marketing practices	**Positive, actual: proactive communication in customer service in an understandable, reliable and transparent manner** We enhance the quality and transparency of customer communications by implementing plain language principles in all types of materials offered to clients. By analysing and implementing best market practices, we ensure high transparency of actions. In addition, we obtain customer feedback on communication, which supports its continuous improvement and the building of trust. **Impact linked to *the Strategy***	Organisation Downstream	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Information-related impacts on consumers or end-users	Access to information (of high-quality)	**Negative, potential: practices misleading customers, misselling** We assume the possibility of potential occurrences of misselling, misleading customers or communication that is unclear to customers due to excessively complex or unclear marketing and advertising messages, which may lead customers to make incorrect financial decisions.	Organisation Downstream	Short Medium Long	**Risk** We identified the risk of loss of credibility and customer trust resulting from the lack of access to full and high-quality information about their products and services (reputational risk). In addition, there is a risk of administrative fines and court proceedings in the event of breaches of consumer protection regulations (compliance risk).	Downstream	Short Medium Long

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
		At the time of preparing the Sustainability Statement, no fine has been imposed on the Pekao Group in connection with the use of practices misleading consumers. **Impact linked to *the Strategy***			We indicate an increased risk related to the imposition by the Office of Competition and Consumer Protection (UOKiK) of fines as a result of practices applied by Bank Pekao S.A., including those related to sanctions of free credit and unauthorised transactions. Due to increasing customer activity, as well as consumer protection by the regulator, which is initiating further proceedings against the Bank, the likelihood of its materialisation in 2025 was identified.		
Social inclusion of consumers or end-users	Non-discrimination Access to products and services	**Positive, actual: ensuring access to financial services for clients from various social groups** The Bank systematically improves customer service processes and the development of remote and mobile channels, with particular emphasis on their ergonomics and accessibility. “Accessibility”, as one of the three pillars of *the Strategy*, means designing the customer experience in a friendly, intuitive way and focused on the quality of contact with the Bank. Under the “Growth” pillar, the Bank adjusts its offering and service model to changing customer needs at various stages of the human life cycle, supporting access to services for diverse social groups. Particular emphasis is placed on building a base of young customers up to 26 years of age by developing modern, digital solutions that meet their lifestyle and expectations. **Impact linked to *the Strategy***	Organisation Downstream	Short Medium Long	**Opportunity** Actions to ensure service availability, such as developing digitalisation, simplifying access to banking or standardising telephone service, enable us to reach a wider group of clients. They facilitate contact with the Bank, increase customer satisfaction and support acquisition of new clients, which translates into revenue growth potential.	Downstream	Short Medium Long
ESRS G1: CORPORATE GOVERNANCE							

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
Business conduct	Corporate culture	**Positive, actual: building a positive organisational culture and employee engagement** Our organisational culture that is based on mutual respect, openness to dialogue and a shared commitment to achieving the organisation's objectives. **Impact linked to *the Strategy***	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Business conduct	Whistleblower protection	**Positive, actual: an effective system and actions protecting whistleblowers** The Bank has a comprehensive *Whistleblowing Procedure* that goes beyond the minimum statutory requirements and includes several additional solutions supporting whistleblowers. The system provides above-standard support measures such as psychological assistance, the possibility of remote work or temporary reassignment to another position, and exemption from the obligation to work while retaining full remuneration.-standard support measures such as psychological assistance, the possibility of remote work or temporary reassignment to another position, and exemption from the obligation to work while retaining full remuneration. **Impact linked to *the Strategy***	Upstream Organisation Downstream	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Business conduct	Whistleblower protection	**Negative, potential: insufficient protection of whistleblowers** We assume the possibility of situations in which persons reporting irregularities, known as whistleblowers, suffer retaliation. Such situations may manifest in various forms of difficulties at work or changes in the treatment of these persons. As a result, this may lead to reduced trust in the available reporting channels, as	Upstream Organisation Downstream	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
		employees may fear negative consequences resulting from disclosing irregularities. **Impact linked to *the Strategy***					
Business conduct	Supplier relationship management, including payment practices	**Positive, actual: implementation of ethics/ESG principles for suppliers** We have implemented the Bank Pekao S.A. Supplier Code of Ethics, which sets out expectations for suppliers in ESG areas. The Bank analyzes reports submitted through the whistleblowing system and verifies supplier documentation. In addition, we apply ESG Forms in every procurement procedure, which enables ongoing verification of suppliers in terms of environmental protection, human rights, and corporate governance. **Impact linked to the business model**	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Business conduct	Corruption and bribery	**Positive, actual: proactive anti-corruption measures, educational activities** We implemented anti-corruption training, concluded with a knowledge test, which raises awareness of principles and procedures and supports their application in daily work. Enforcement of principles is ensured through reviews of internal regulations and regular compliance checks carried out by the Compliance Department, and periodic reporting to the Management Board and the Supervisory Board. If any solution is found to be ineffective, corrective actions are implemented. **Impact linked to the business model**	Organisation	Short Medium Long	**No material opportunities or risks identified.**	N/A	N/A
Business conduct	Corruption and bribery	**Negative, potential: incidents of corruption and bribery**	Organisation Downstream	Short Medium	**No material opportunities or risks identified.**	N/A	N/A

SUB-TOPIC	SUB-SUB-TOPIC	IMPACT MATERIALITY			FINANCIAL MATERIALITY		
		TYPE AND DESCRIPTION	LOCATION OF IMPACT	IMPACT HORIZON	TYPE AND DESCRIPTION	LOCATION	HORIZON
		Despite the policies in place to prevent instances of corruption and bribery, it is not possible to eliminate them entirely. All positions within the Bank are equally exposed to the risk of corruption. **Impact linked to the business model**		Long			

Some conclusions regarding impacts, risks and opportunities assessed as material have changed as a result of the review and update of the double materiality assessment. We present a summary of these changes in the table below.

Summary of changes to the results of impacts, risks and opportunities identified as part of the 2025 update of the double materiality assessment

REASON FOR CHANGE	DESCRIPTION OF CHANGE
• Expansion of the list of impacts to include a catalogue of potential negative impacts due to the rapidly changing regulatory and market environment	**We have identified the following additional potential negative impacts as material, due to the Bank operating in an increasingly complex regulatory environment and growing stakeholder pressure, as well as increased customer awareness and expectations:** • **ESRS S4: Misleading customer practices; mis-selling** – We assume that cases may potentially occur where customers are misled by overly complex or unclear marketing and advertising messages, which may lead customers to make incorrect financial decisions. At the time of preparing the Sustainability Statement, no fine has been imposed on the Pekao Group in connection with the use of practices misleading consumers. • **ESRS G1: Insufficient whistleblower protection** – We assume the possibility of situations in which persons reporting irregularities, known as whistleblowers, suffer retaliation. Such situations may manifest in various forms of difficulties at work or changes in the treatment of these persons. As a result, this may lead to reduced trust in the available reporting channels, as employees may fear negative consequences resulting from disclosing irregularities. • **ESRS G1: Incidents of corruption and bribery –** We are aware that, despite the policies in place to prevent cases of corruption and bribery, it is not possible to eliminate them entirely.
• Combination of impacts overlapping in type with ESRS impacts	**We have removed from the summary of material impacts the following duplicate impacts overlapping with other material impacts previously assigned directly to ESRS:** • **Sustainable finance (additional topic under ESRS E1)** – positive impact linked to financing environmentally sustainable activities. Topic described under IRO *Climate change mitigation* in ESRS E1. • **Financial education (additional topic under ESRS S4)** – positive impact linked to information programmes, workshops and information campaigns for a broad audience on the use of banking products, investing, household budgeting, saving, etc. Topic described under IRO *Consumer privacy*. • **Cybersecurity and data security (additional topic under ESRS S4)** – positive impact linked to a high level of data and systems protection and investment in modern technologies supporting data security. Topic described under IRO *Consumer privacy*. • **Personal safety of consumers or end-users (ESRS S4)** – positive impact linked to consumer protection through the implementation of technological, organisational and system solutions. Topic described under IRO *Consumer privacy*.

<table>
<tr><th>REASON FOR CHANGE</th><th>DESCRIPTION OF CHANGE</th></tr>
<tr><td>• EFRAG's approach to compliance activities presented in the simplified ESRS</td><td>We have removed the following impacts from the summary of material impacts:
• ESRS S1: Effective employee privacy protection system – In connection with the update of the materiality assessment approach, in accordance with EFRAG guidelines, the Bank does not treat compliance with legal obligations as a positive impact. We have identified the area of employee privacy protection as a compliance activity, resulting, among other things, from the requirements of the GDPR. Its effectiveness is confirmed by the results of employee surveys.
• Tax transparency (additional topic under ESRS G1) – cooperation with tax authorities and compliance with CRS / FATCA regulations; following the renewed review of the double materiality assessment, we have concluded that these activities constitute basic legal compliance and fall within the compliance area. Therefore, they should not be classified as material IRO and, accordingly, their further presentation as a material positive impact was discontinued.</td></tr>
<tr><td>• Assumptions of the Strategy for 2025–2027</td><td>We have removed the following impacts from the summary of material impacts:
• ESRS E1: Financing activities supporting climate change adaptation – As a result of the review of the double materiality analysis approach, we clarified the differences between climate change mitigation and climate change adaptation. The material positive impact is exerted primarily through financing actions supporting climate change mitigation, which follows directly from the assumptions of the Group's Strategy for 2025–2027, which focuses on supporting the transition towards a low-carbon economy. At the same time, financial products financing climate change adaptation strictly as such do not yet constitute a significant part of our business.
We have changed the allocation of opportunities to the sub-topics provided for in ESRS E1:
• For 2024, we have identified material opportunities in this area in the Climate change adaptation and Climate change mitigation sub-topics. The objective resulting from the Strategy for 2025-2027 and the sustainable financing provided by the Group to date mainly concern activities related to the environmental objective of Climate change mitigation within the meaning of the EU Taxonomy. Therefore, we have identified a material financial opportunity in the sub-topic Climate change mitigation under ESRS E1 and removed from the list a material opportunity that was related to the sub-theme Climate change adaptation for 2024.
We have identified an additional material financial opportunity:
• ESRS S4: Ensuring the availability of financial services for customers from different social groups - Actions to ensure service availability, developing digitalisation, simplifying access to banking or standardising telephone service, enable us to reach a wider group of clients. They facilitate contact with the Bank, increase customer satisfaction and support acquisition of new clients, which translates into revenue growth potential.</td></tr>
<tr><td>• Conducting an in-depth ESG risk materiality analysis, aligned with the new EBA Guidelines on ESG risk management</td><td>We have identified an additional material financial risk:
As a result of the update of the double materiality assessment, we assessed climate-related transition risk concerning the loan portfolio as material over the long-term time horizon.
This results from conducting a more in-depth materiality analysis than in the previous year, aligned with the new requirements of the EBA Guidelines on ESG risk management – i.e., taking into account:
• broader use of quantitative contextual data, for example in relation to indicators of portfolio alignment with the global Net Zero 2050 scenario,
• an available – for the first time – detailed market benchmark of conclusions from double materiality assessments conducted under ESRS by other market participants,
• conclusions arising from the work carried out by the Bank on the Transition Plan portfolio, in line with the requirements indicated by the EBA Guidelines.</td></tr>
</table>

13.1.3.4 Resilience analysis of Pekao Group's Strategy and business model in terms of our ability to counteract material adverse impacts and risks and to leverage material opportunities

In the second half of 2025, we carried out a qualitative and quantitative analysis of the resilience of our *Strategy* and business model to material adverse impacts and risks, taking into account the context of our ability to leverage material opportunities (hereinafter: the "resilience analysis").

Assumptions of the resilience analysis in relation to material adverse impacts and risks, and conclusions from the analysis performed

As a first step, for each material adverse impact, we verified whether incidents of materialisation of a given adverse impact had occurred over the last five years and examined the effect of those incidents on the stability and profitability of our operations. Depending on the nature of the adverse impact in question, we considered:

- the cumulative increase in provisions over the period under review, in connection with the incident in question,
- the result of the analysis of mass customer complaints in relation to the relevant matter,
- the result of the analysis of mass court claims filed against Pekao Group in connection with the relevant matter,
- verification as to whether the PFSA imposed an additional capital requirement on the Bank due to the incident.

Subsequently, for each adverse impact we analysed:

- the scope of remedial and preventive actions implemented, and
- remedial and preventive actions planned to be implemented, relating in particular to Pekao Group's strategic objectives, as well as projects underway within Pekao Group.

We also considered whether, during the double materiality assessment, we assessed the risk linked to a given adverse impact as material. Assessing a given risk as not financially material through the double materiality assessment confirmed for us that the risk does not affect the resilience of our Strategy and business model. Where a material risk linked to a given impact was identified, we verified whether the remedial and preventive actions implemented or planned mitigate that risk sufficiently to ensure the resilience of our Strategy and business model.

Based on the resilience analysis performed, we conclude that Pekao Group's Strategy and business model are resilient to material adverse impacts and sustainability-related risks over the time horizons indicated by ESRS.

We describe details of the remedial and preventive actions we undertake in respect of material adverse impacts and risks in the relevant thematic chapters of this Statement.

Specific assumptions of the resilience analysis in relation to material adverse impacts and risks linked to climate, and conclusions from the analysis performed

As indicated in the description of our approach to conducting the double materiality assessment, based on the analyses carried out, we identified one material adverse impact and one material climate-related risk – both relating to our loan portfolio.

The material adverse impact concerns Pekao Group's financing of activities that generate greenhouse gas emissions, in particular high-emission investments. The material risk linked to that impact concerns climate-related transition risk (transformational risk), i.e., a potential decline in the debt-servicing capacity of high-emission entities over the long-term time horizon due to higher regulatory costs and shifts in demand towards a low-carbon economy.

Given the long-term perspective of the materiality of climate risk, we examined our resilience to the identified climate risk using climate transition risk stress tests on the Bank's loan portfolio credit risk, developed by the Bank for the first time in the second half of 2025. Stress tests were performed solely for the Bank, due to the material share and scale of its loan portfolio within the overall Group. The loan portfolios of the other Pekao Group companies are immaterial from a climate risk standpoint and therefore were not covered by a separate resilience analysis.

For this purpose, we estimated the increase in expected credit loss provisions over a three-year horizon, using assumptions from the short-term climate shock scenario developed by the NGFS (Network for Greening the Financial System) entitled "NGFS Short-term Climate Scenario – Diverging Realities (DIRE)", which we calibrated using expert judgement and overlaid on the baseline macroeconomic scenario. NGFS short-term scenarios are a tool enabling a structured analysis of the direct (almost immediate) effects of climate policies and climate change on financial stability and economic resilience. These scenarios also capture the macroeconomic effects of climate-related physical risk. In our view, they allow for an understanding of possible extreme adverse financial effects resulting from potential shock regulatory and technological actions aimed at the transition towards a low-carbon economy, which may occur across different time horizons – particularly over the long-term time horizon.

The estimated increases in provisions under the shock scenario of the climate stress tests do not pose a threat to the Bank's financial result or the Bank's capital adequacy.

Taking the above into account, as well as the fact that in this year's EBA stress test exercise our Bank was among the most resilient to stress factors among the 64 European banks included in the sample, we consider our Strategy and business model to be resilient to the material adverse impact and the associated material climate-related risk. Nevertheless, we bear in mind that the long-term perspective of climate change projections and the volatility of the regulatory and technological environment mean that any estimates of their impact on credit risk are subject to a significant degree of uncertainty. Accordingly, we will perform climate risk stress tests on a regular basis, using the most up-to-date and most appropriate assumptions available in order to estimate as accurately as possible the potential effects of climate risk on our financial position.

We describe details of the remedial and preventive actions we undertake in respect of material climate-related matters in the chapter ESRS E1: Climate change. Our *Transition Plan* is a particularly important tool we have implemented to further build our resilience to climate risk is. We describe the assumptions of *the Plan* in the above-mentioned chapter of this Sustainability Statement. We assess that, as a Group, we have the capacity to adapt our Strategy and business model to climate change over the short-, medium- and long-term.

Assumptions of the resilience analysis in relation to material opportunities, and conclusions from the analysis performed

We began the resilience analysis in relation to material opportunities by mapping the material opportunities we identified to our strategic objectives set out in *the Strategy*. As a next step, we analysed whether and how we act proactively to leverage material opportunities related to sustainability. For this purpose, we considered:

- what business actions and innovations are undertaken within the organisation as part of a proactive approach to leveraging the given opportunity,
- whether and how the achievement of strategic objectives is monitored regularly,
- what actions we assume would be taken if the achievement of a given strategic objective were at risk.

Based on the resilience analysis performed, we conclude that we actively leverage the material opportunities related to sustainability that we have identified, which contributes to building the resilience of Pekao Group's Strategy and business model over the time horizons indicated by ESRS.

We describe details of the actions we undertake to leverage material opportunities related to sustainability in the relevant thematic chapters of this Sustainability Statement.

13.1.4 Managing Impacts, risks and opportunities

13.1.4.1 Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]

In the process of preparing the Sustainability Statement in accordance with the ESRS requirements for the year 2024, we conducted a double materiality assessment for the first time, in order to identify, for the Bank and the entire Pekao Group, the key stakeholder groups as well as the material impacts, risks and opportunities related to sustainability matters.

As part of the preparations for drawing up the Sustainability Statement for the year 2025, we reviewed the assumptions and updated the conclusions from the double materiality assessment. The results of the assessment form the basis for our actions and for setting the Bank's strategic objectives for the future.

The first double materiality assessment process was carried out in 2024 by a project team representing the Bank's key units, and the whole process was overseen by the Steering Committee, comprising the Bank's Department Directors and representatives of the Management Board. At regular meetings, the Steering Committee monitored progress and compliance with the adopted methodology. The results were discussed and approved by the Steering Committee. The process of reviewing and updating the double materiality assessment was carried out in 2025 by a project team representing the Bank's key units. The results of this process were discussed and approved by the ESG Council.

The assessment was conducted in accordance with the ESRS requirements and took into account two perspectives: impact materiality and financial materiality of the Group's activities in relation to sustainability matters, as well as the impact of individual matters on our financial performance in the future. To ensure consistency with the Bank's risk management approach, the risk area actively participated in the process and was involved in identifying and assessing risks and opportunities, including setting materiality thresholds for ESG risks and opportunities, so that in the coming years ESG risks and opportunities can be fully integrated into the Group's existing risk management system,.

When conducting the assessment, we divided the work into four stages:

- identifying material sectors of activity and mapping the value chain,
- analysing existing data, including market context (benchmarking) and stakeholder dialogue, and assessing impact materiality,
- assessing the financial materiality of risks and opportunities,
- matrix analysis of results and updating the list of ESG topics that are material from the Pekao Group's perspective.

We carried out the double materiality assessment using various research tools, involving:

- the Bank's experts, who assessed the organisation's impacts and financial materiality,
- key internal and external stakeholders, through a survey concerning sustainability matters,
- selected members of the Bank's management team, with whom structured interviews were conducted, as well as a peer benchmarking analysis, an analysis of ESG ratings, and industry reports.

The sector identification methodology was based on the latest version of the ESRS, as well as the publicly available EFRAG sector classification. To identify sectors, we assumed a threshold of >10% of revenue in the last financial year. The sector survey was constructed based on EFRAG recommendations (the *Exposure Draft European Sustainability Reporting Standard SEC1 – Sector classification and General approach to sector specific ESRS*).

The Group's key stakeholders were selected based on a questionnaire survey (16 stakeholder groups), in which two parameters were assessed:

- the impact of the Pekao Group on a given stakeholder group,
- the interest of a given stakeholder group in the Pekao Group.

As a result of analysing the responses and mapping stakeholders, we identified nine key stakeholder groups.

The impact materiality assessment was performed in stages, starting with an analysis of sustainability reports published by peer entities, an analysis of ESG ratings and an analysis of sector reports, as well as interviews with key internal stakeholders. The materiality assessment methodology included a comprehensive examination of the Pekao Group's impacts on its environment and the verification of:

- the timing of the impact,
- the scale of the impact,
- the likelihood of the impact,
- the scope of the impact,
- the reversibility of the impact.

To ensure the most neutral approach possible, the analysis used a variety of data sources, including:

- interviews with internal stakeholders,
- a benchmarking analysis, which included:
  - benchmarking of sustainability reports published by peer entities,
  - benchmarking of sector reports,
  - benchmarking of ESG ratings,
- an anonymous survey among stakeholders (internal and external stakeholders).

With respect to the above criteria required by the ESRS standards and based on the data obtained enabling an initial indication of potentially material topics, we carried out a final impact assessment at the Bank, under which we analysed all ESRS topical standards. However, we assumed that for topical standards whose non-materiality was confirmed in the preliminary analyses, the Group's impact on stakeholders may be deemed non-material. For actual negative impacts, materiality was based on the severity of the impact (scale, scope, irreversibility), and for potential negative impacts – on severity and likelihood. For positive impacts, the basis for their assessment was the scale and scope of the impact for actual impacts, and the scale, scope and likelihood for potential impacts. For each of the above impact assessment categories, we used a scale from 1 to 5, where 1 represents the minimum value and 5 the maximum. We considered topics material if, on average, they scored more than half of the total possible points in the impact assessment and were validated through the preliminary analyses. For topics that achieved the required minimum points in the self-assessment but were not identified as material in the preliminary analyses, we re-assessed them with the project team's judgement.

As part of the 2025 review process of the double materiality assessment, the following elements were updated:

- benchmarking analysis of sustainability reports published by peer entities – available ESRS-compliant reports published for the year 2024 by Polish and European banks were used,
- the Bank's expert impact assessment – the initial long list of impacts considered was updated, among other things, to better balance the range of positive and negative impacts, as well as to include quantitative contextual information supporting the materiality assessment; the expert assessment of the materiality of impacts conducted during internal workshops was also updated. A description of how these changes affected the list of material impacts, risks and opportunities is provided in the section **[Material impacts, risks and opportunities and their interrelationships with strategy and the business model (SBM-3)]**.

We linked the financial materiality assessment to the conclusions from the impact materiality assessment, as a result of which we determined an initial long list of risks and opportunities, where risks were defined as potential consequences of negative impacts, and opportunities as potential possibilities arising from creating positive impacts. We assessed each risk and each opportunity in terms of likelihood and its potential financial impact on the Pekao Group across three-time perspectives (in the current reporting year, up to 5 years and over 5 years, in particular at least 10 years for the assessment of the materiality of risks). The assessment was conducted during internal workshops attended by the Bank's experts responsible for the relevant topic areas. We assumed that a given risk or opportunity is considered material if, in any of the time horizons, it achieved a score of at least 12 (expressed as the product of likelihood and financial impact, both assessed on five-point scales).

In addition, as part of the 2025 review process of the double materiality assessment, we took into account the following elements in relation to risks and opportunities:

- the risk materiality analysis was aligned with the assumptions arising from the EBA Guidelines on ESG risk management (in particular, to reflect at least a 10-year time horizon in the analysis, to integrate financial materiality levels with the ICAAP process, and to identify ESG risk transmission channels to traditional risks indicated in the EBA Guidelines, i.e. credit risk (including concentration risk), market risk, liquidity risk, operational risk, reputational risk and business model risk),
- the scale used to assess the financial materiality of risks and opportunities was redefined from a qualitative scale to a quantitative scale, with monetary thresholds linked to the ICAAP process,
- the initial long list of risks and opportunities, in terms of:
  - defining risks as potential consequences of negative impacts and opportunities as potential possibilities arising from positive impacts (during workshop discussions in the DMA process, no ESG risks or opportunities unrelated to negative or positive impacts were identified),
  - including quantitative contextual information in the list to support the materiality assessment (e.g. sectoral concentration of the credit portfolio, amounts of operational losses, etc.),
  - a prudent assumption under which monetary opportunities were not identified in relation to positive impacts resulting from our regulatory / compliance activities, which primarily serve to reduce risk and the occurrence of negative impacts, and are not necessarily activities that can actively contribute to increasing the Pekao Group's revenues.

Description of the processes for identifying and assessing material impacts, risks and opportunities related to climate [E1.IRO-1]

Description of the process in relation to impacts and opportunities

We presented the materiality of climate-related impacts and opportunities in line with the approach described in detail in the previous section.

As part of the impact materiality assessment, we considered our impacts on climate across the value chain. In the context of analysing negative impacts, we considered in particular the sources of greenhouse gas emissions within our value chain. Taking into account the specific nature of the banking sector, we identified that a material actual negative impact is exerted through indirect greenhouse gas emissions resulting from the activities of our financed clients. With reference to *the Strategy*, we also identified that we exert a material positive impact related to increasing volumes of environmentally sustainable financing that supports the reduction of financed GHG emissions.

In connection with this material positive impact, we also identified a material financial opportunity under the "climate change mitigation" subtopic, relating to the expectation of increased revenues from offering financial products that support the reduction of GHG emissions and accelerate the transition of the Group's clients to a low-carbon economy, in line with the objective set out in the Strategy.

We present further details on greenhouse gas emissions in our value chain in subsection [E1-6].

Description of the process in relation to climate risk

We also analysed climate-related risks in detail:

- **physical risks** – for physical risks, the identification and assessment performed as part of the financial materiality analysis was based, in accordance with the requirements of Article 20. b) i., AR 11, on a high-emissions climate scenario (SSP5-8.5). An analysis was carried out of the concentration of Pekao Group credit exposures in locations with elevated physical risk according to ThinkHazard.org maps (where, for real estate-secured exposures, the location of the collateral was analysed, and for other exposures, the location of the borrower's registered office). The results of the analyses concerning our (downstream) portfolio, on the basis of which we concluded that physical risk is non-material for our portfolio, are published in the reports: *Information on the capital adequacy of Bank Pekao S.A. Group* – these include, among other things, exposure volumes and impairment by hazard type and sector. With respect to our own operations and the upstream part of the value chain, we considered physical risk to be non-material on the basis of a qualitative analysis supported by physical risk maps that take into account prospective risk aspects arising from climate scenarios, and by empirical observations regarding operational losses due to natural disasters.
- **transition risk** – for transition risk, we first analysed, in accordance with *the Guidelines on ESG risk management*, the sectoral concentration of our portfolio in sectors A–H and L (i.e. sectors that contribute significantly to climate change), with particular focus on exposures to fossil fuel sectors. We also considered our analyses related to developing the portfolio Transition Plan in line with the requirements indicated by the EBA Guidelines on ESG risk management, as well as indicators of alignment of the high-emission sectors we finance with the Net Zero 2050 scenario. We conducted climate transition risk stress tests for the first time in Q4 2025 in line with the timetable of our internal project to implement the aforementioned EBA Guidelines. We describe the key assumptions in the disclosure concerning the resilience analysis of our strategy and business model in section [SBM-3]. The results of this forward-looking quantitative analysis confirm our conclusion that transition risk in the credit portfolio is material in the long-term time horizon. With respect to our own operations and the upstream part of the value chain, we considered transition risk to be non-material, as the Pekao Group does not operate in any of sectors A–H and L, and we also observe that our carbon footprint in this area is negligible compared to the carbon footprint resulting from our credit portfolio.

Description of the processes for assessing the materiality of impacts, risks and opportunities related to environmental matters other than climate

For the remaining topics, we analysed:

- E2 (Pollution) – from the perspective of financial activities, the ESRS E2 subtopic relating to pollution is not material. Within our assessment processes, the Bank takes into account potential indirect impacts related to pollution generated by financed entities. At the same time, based on the assessment performed, indirect impacts in the pollution area were considered less material compared to impacts identified in other ESRS areas:

– ESRS E1 "Climate change mitigation" – through assessing the financing of activities causing greenhouse gas emissions, which are often also associated with emissions of air pollutants;

– ESRS E4 "Biodiversity and ecosystems" – through analysing pressures on ecosystems in line with the ENCORE methodology, including, among other things, emissions of pollutants to air, water and soil.

On this basis, we did not identify material impacts or material risks in the pollution area from the perspective of the Bank's financial activities.

At the same time, we did not conduct consultations with affected communities regarding pollution, because both within our own operations and across the entire value chain, the Pekao Group does not exert an impact on the local environment that would justify such actions.

- E3 (Water and marine resources) – the ESRS E3 subtopic focuses primarily on direct water consumption and wastewater discharge within companies' own operations, particularly in manufacturing sectors. For this reason, this standard does not reflect the specifics of financial institutions, whose impact on water resources is marginal and indirect.

As part of the double materiality assessment, we confirmed that both our operational activity – covering head offices and the branch network – as well as the credit portfolio do not generate a material impact on water and marine resources, either at organisational level or across the entire value chain.

Consequently, we did not conduct dedicated dialogue with local communities in relation to this topic, as the nature of our activities does not generate impacts that would justify such actions.

Based on the analysis carried out, we also did not identify material risks or opportunities in the area of water and marine resources, from the perspective of both our own activities and the financial portfolio.

- E4 (Biodiversity and ecosystems) – from the portfolio perspective, we assessed how the sectors we finance may affect ecosystem services, in line with the ENCORE methodology used under the E4 standard.

  Based on the analysis carried out, we did not identify material impacts, risks or opportunities related to biodiversity and ecosystem functioning.

  In addition, we confirm that the Group does not have locations situated in biodiversity-sensitive areas or in their immediate vicinity. Therefore, the topic was not considered material and no dedicated dialogue with local communities was conducted in this respect.

- E5 (Circular economy) – from the portfolio perspective, we assessed impacts resulting from financing activities that may generate significant amounts of waste. However, in accordance with the ESRS E5 requirements, these matters are not considered material for financial institutions and, in our practice, are addressed through the assessment of pressures on ecosystems conducted in line with the ENCORE methodology under the ESRS E4 standard.

  From the perspective of our operational activities, we generate only typical office and municipal waste, without producing hazardous or industrial waste. We consistently reduce the amount of waste, among other things, through segregation, process digitisation, the use of electronic signatures and increasing the share of payment cards made from environmentally friendly materials.

  As part of the double materiality assessment, we did not identify material impacts, risks or opportunities related to waste management – either at organisational level or across the value chain – therefore, we did not conduct dedicated local consultations.

Summary

As a result of the assessment, we identified:

- the Pekao Group's classification within a single sector: Credit institutions in the macro-sector Financial institutions;
- 9 (nine) key stakeholder groups;
- 4 (four) material ESRS topics (E1, S1, S4, G1) and 25 (twenty-five) material impacts, 2 (two) material opportunities and 2 (two) material risks. Most material impacts (17) relate to the social pillar and focus on aspects connected with own workforce (10) and consumers and end-users (7). Under the environmental pillar, we identified two material impacts related to climate; and under the corporate governance pillar we identified 6 (six) material impacts. Material financial opportunities relate to climate change mitigation and the accessibility of services for our customers. In turn, the material risks relate to:

– the potentially material effect of climate-related transition risk on credit risk (including concentration risk) of our portfolio in the long-term time horizon,

– the elevated risk of the Office of Competition and Consumer Protection (UOKiK) imposing fines as a result of practices applied by the Bank, including those related to free credit sanction and unauthorised transactions.

13.1.4.2 Disclosure requirements under ESRS covered by the undertaking's Sustainability Statement [IRO-2]

ESRS compliance table:

	DISCLOSURE	LOCATION IN THE REPORT (CHAPTER NUMBER)	OMISSIONS AND EXPLANATIONS
ESRS 2	BP-1 General basis for preparing sustainability statements	13.1.1, 13.1.2	
	BP-2 Disclosures related to specific circumstances	13.1.1	
	GOV-1 Roles and responsibilities of the undertaking's administrative, management and supervisory bodies	13.1.2.1	
	GOV-2 Information provided to the undertaking's administrative, management and supervisory bodies on sustainability matters	13.1.2.2	

	DISCLOSURE	LOCATION IN THE REPORT (CHAPTER NUMBER)	OMISSIONS AND EXPLANATIONS
	GOV-3 Integration of sustainability-related performance in incentive schemes	13.1.2.3	
	GOV-4 Due diligence statement	13.1.2.4	
	GOV-5 Risk management and internal controls in sustainability reporting	13.1.2.5	
	SBM-1 Market position, strategy, business model, and value chain	13.1.3.1	
	SBM-2 Views, interests, and expectations of stakeholders	13.1.3.2	
	SBM-3 Interaction of influences, strategy, and business model of the company	13.1.3.3	
	IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities	13.1.4.1	
	IRO-2 Disclosure requirements under ESRS covered by the entity's sustainability statement	13.1.4.2	
	CLIMATE CHANGE		
ESRS E1	GOV-3 Incorporation of sustainability-related performance in incentive schemes	13.1.2.3	
	SBM-3 Material impacts, risks, and opportunities and their interconnections with strategy and business model	13.1.3.3	
	IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	13.1.4.1	
	E1-1 Transition plan for climate change mitigation	13.1.2.1	
	E1-2 Policies related to climate change mitigation and adaptation	13.1.2.1	
	E1-3 Actions and resources related to climate policy	13.1.2.1	
	E1-4 Climate change mitigation and adaptation targets	13.2.2	
	E1-5 Energy consumption and energy mix	13.2.2	
	E1-6 Gross greenhouse gas emissions for Scopes 1, 2, and 3 and total greenhouse gas emissions	13.2.2	
	E1-7 Greenhouse gas removal and emission reduction projects financed through carbon emission units		N/A
	E1-8 Internal carbon pricing		N/A
	E1-9 Anticipated financial impacts of material physical risks, transition risks, and potential climate-related opportunities		N/A
	POLLUTION		

	DISCLOSURE	LOCATION IN THE REPORT (CHAPTER NUMBER)	OMISSIONS AND EXPLANATIONS
ESRS E2	IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities related to pollution	13.1.4.1	
	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 water and marine resources	13.1.4.1	
	E3-1 Policies related to water and marine resources		N/A
	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
	BIODIVERSITY AND ECOSYSTEMS		
ESRS E4	SBM-3 Material impacts, risks, and opportunities and their interconnections with strategy and business model		N/A
	IRO-1 Description of the processes to identify and assess material biodiversity and ecosystems-related impacts, risks and opportunities	13.1.4.1	
	E4-1 Biodiversity and ecosystem transformation plan and inclusion of biodiversity and ecosystems in strategy and business model		N/A
	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

	DISCLOSURE	LOCATION IN THE REPORT (CHAPTER NUMBER)	OMISSIONS AND EXPLANATIONS
	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	13.1.4.1	
	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 Interests and opinions of stakeholders	13.1.3.2	
	SBM-3 Material impacts, risks, and opportunities and their interconnections with strategy and business model	13.1.3.3	
	S1-1 Policies related to own workforce	13.3.1.1	
	S1-2 Procedures for engagement with own employees and employee representatives regarding impacts	13.3.1.1	
	S1-3 Processes for mitigating negative impacts and employee grievance mechanisms	13.3.1.1	
	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	13.3.1.1	
	S1-5 Targets related to managing material negative impacts, enhancing positive impacts, and managing material risks and opportunities	13.3.1.2	
	S1-6 Characteristics of the entity's employees	13.3.1.2	
	S1-7 Characteristics of non-employee workers classified as part of the entity's own workforce	13.3.1.2	
	S1-8 Scope of collective bargaining and social dialogue	13.3.1.2	
	S1-9 Diversity indicators	13.3.1.2	
	S1-10 Fair remuneration	13.3.1.2	
	S1-11 Social protection	13.3.1.2	

	DISCLOSURE	LOCATION IN THE REPORT (CHAPTER NUMBER)	OMISSIONS AND EXPLANATIONS
	S1-12 Persons with disabilities		N/A
	S1-13 Training and skills development indicators	13.3.1.2	
	S1-14 Occupational health and safety indicators	13.3.1.2	
	S1-15 Work-life balance indicators	13.3.1.2	
	S1-16 Remuneration indicators (gender pay gap and total remuneration)	13.3.1.2	
	S1-17 Incidents, complaints, and material impacts on human rights compliance	13.3.1.2	
WORKERS IN THE VALUE CHAIN			
ESRS S2	SBM-2 Interests and opinions of stakeholders		N/A
	SBM-3 Material impacts, risks, and opportunities and their interconnections with strategy and business model		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
AFFECTED COMMUNITIES			
ESRS S3	SBM-2 Interests and opinions of stakeholders		N/A
	SBM-3 Material impacts, risks, and opportunities and their interconnections with strategy and business model		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

	DISCLOSURE	LOCATION IN THE REPORT (CHAPTER NUMBER)	OMISSIONS AND EXPLANATIONS
	CONSUMERS AND END-USERS		
ESRS S4	SBM-2 Interests and opinions of stakeholders	13.1.3.2	
	SBM-3 Material impacts, risks, and opportunities and their interconnections with strategy and business model	13.1.3.3	
	S4-1 Policies related to consumers and end-users	13.4.1	
	S4-2 Processes for engagement with consumers and end-users regarding impacts	13.4.1.1	
	S4-3 Processes for mitigating negative impacts and grievance mechanisms for consumers and end-users	13.4.1.1	
	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	13.4.1.1	
	S4-5 Targets related to managing material negative impacts, enhancing positive impacts, and managing material risks and opportunities	13.4.1.2	
	BUSINESS CONDUCT		
ESRS G1	GOV-1 Roles and responsibilities of administrative, management, and supervisory bodies of the company	13.5.1	
	G1-1 Corporate culture and business conduct policies	13.5.1	
	G1-2 Management of relationships with suppliers	13.5.1	
	G1-3 Prevention, detection, and mitigation of corruption and bribery	13.5.1	
	G1-4 Confirmed incidents of corruption or bribery	13.5.2	
	G1-5 Political influence and lobbying activities		N/A
	G1-6 Payment practices	13.5.2	

List of data points contained in cross-cutting and thematic standards derived from other EU regulations:

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE TO THE REGULATION ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR (CHAPTER NO.)	REFERENCE TO PILLAR 3 (2)	REFERENCE TO THE BENCHMARKS REGULATION (3)	REFERENCE TO THE EUROPEAN CLIMATE LAW (4)
ESRS 2 GOV-1 Gender diversity of the Management Board members (point 21(d))	13.1.2.1		Annex II to Commission Delegated Regulation (EU) 2020/1816 (5)	
ESRS 2 GOV-1 Percentage of independent Management Board members (point 21(e))	13.1.2.1		Annex II to Commission Delegated Regulation (EU) 2020/1816	
ESRS 2 GOV-4 Due diligence statement (point 30)	13.1.2.4			
ESRS 2 SBM-1 Participation in fossil fuel-related activities (point 40(d)(i))	13.1.3.1			
ESRS 2 SBM-1 Participation in chemical production activities (point 40(d)(ii))	N/A			
ESRS 2 SBM-1 Participation in controversial weapons-related activities (point 40(d)(iii))	N/A			
ESRS 2 SBM-1 Participation in tobacco cultivation and production activities (point 40(d)(iv))	N/A			
ESRS E1-1 Transition plan to achieve climate neutrality by 2050 (point 14)	13.1.2.1			Article 2(1) of Regulation (EU) 2021/1119
ESRS E1-1 Entities excluded from the scope of Paris Agreement-aligned benchmarks (point 16(g))	13.1.2.1	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	
ESRS E1-4 Greenhouse gas emission reduction targets (point 34)	13.2.2	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	
ESRS E1-5 Energy consumption from fossil sources disaggregated by source (applies only to sectors with significant climate impact), point 38	13.2.2			
ESRS E1-5 Energy consumption and energy mix, point 37	13.2.2			

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE TO THE REGULATION ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR (CHAPTER NO.)	REFERENCE TO PILLAR 3 (2)	REFERENCE TO THE BENCHMARKS REGULATION (3)	REFERENCE TO THE EUROPEAN CLIMATE LAW (4)
ESRS E1-5 Energy intensity associated with activities in sectors with significant climate impact, points 40–43	13.2.2			
ESRS E1-6 Gross greenhouse gas emissions for Scopes 1, 2, and 3 and total greenhouse gas emissions, point 44	13.2.2	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	
ESRS E1-6 Gross greenhouse gas emission intensity, points 53–55	13.2.2	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	
ESRS E1-7 Greenhouse gas removals and carbon emission units, point 56	13.2.2			Article 2(1) of Regulation (EU) 2021/1119
ESRS E1-9 Portfolio reference exposure to physical climate risk, point 66	13.2.2		Annex II to Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, point 66(a) ESRS E1-9 Location of significant asset components subject to substantial physical risk, point 66(c)	13.2.2	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		
ESRS E1-9 Breakdown of book value of real estate by energy efficiency classes, point 67(c)	1.2.2	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-collateralised loans – energy efficiency of collateral		

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE TO THE REGULATION ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR (CHAPTER NO.)	REFERENCE TO PILLAR 3 (2)	REFERENCE TO THE BENCHMARKS REGULATION (3)	REFERENCE TO THE EUROPEAN CLIMATE LAW (4)
ESRS E1-9 Degree of portfolio exposure to climate-related opportunities, point 69	13.2.2		Annex II to Delegated Regulation (EU) 2020/1818	
ESRS E2-4 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	N/A			
ESRS E3-1 Water and marine resources, point 9	N/A			
ESRS E3-1 Specific policy, point 13	N/A			
ESRS E3-1 Sustainable practices in the field of seas and oceans, point 14	N/A			
ESRS E3-4 Total volume of water recycled and reused, point 28(c)	N/A			
ESRS E3-4 Total water consumption in m³ per net revenue from own operations, point 29	N/A			
ESRS 2 IRO1-E4 point 16(a)(i)	N/A			
ESRS 2 IRO1-E4 point 16(b)	N/A			
ESRS 2 IRO1-E4 point 16(c)	N/A			
ESRS E4-2 Sustainable land/agriculture practices or policies, point 24(b)	N/A			
ESRS E4-2 Sustainable ocean/marine practices or policies, point 24(c)	N/A			
ESRS E4-2 Policies for deforestation prevention, point 24(d)	N/A			
ESRS E5-5 Non-recycled waste, point 37(d)	N/A			
ESRS E5-5 Hazardous and radioactive waste, point 3	N/A			
ESRS 2 SBM-3-S1 Risk of forced labour cases, point 14(f)	13.3.1.1			
ESRS 2 SBM-3-S1 Risk of child labour cases, point 14(g)	13.3.1.1			
ESRS S1-1 Commitments regarding policies on human rights respect, point 20	13.3.1.1			
ESRS S1-1 Due diligence strategies concerning issues covered by core International Labour Organization Conventions No. 1–8, point 21	13.3.1.1			
ESRS S1-1 Procedures and measures for preventing human trafficking, point 22	13.3.1.1		Annex II to Commission	

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE TO THE REGULATION ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR (CHAPTER NO.)	REFERENCE TO PILLAR 3 (2)	REFERENCE TO THE BENCHMARKS REGULATION (3)	REFERENCE TO THE EUROPEAN CLIMATE LAW (4)
			Delegated Regulation (EU) 2020/1816	
ESRS S1-1 Policy or management system for accident prevention at work, point 23	13.3.1.1			
ESRS S1-3 Complaint-handling mechanisms, point 32(c)	13.3.1.1			
ESRS S1-14 Number of work-related deaths and the number and rate of work-related accidents, point 88(b)-(c)	13.3.1.2			
ESRS S1-14 Number of days lost due to injuries, accidents, fatalities, or illnesses, point 88(e)	13.3.1.2		Annex II to Commission Delegated Regulation (EU) 2020/1816	
ESRS S1-16 Unadjusted gender pay gap, point 97(a)	13.3.1.2			
ESRS S1-16 Excessive CEO pay level, point 97(b)	13.3.1.2		Annex II to Commission Delegated Regulation (EU) 2020/1816	
ESRS S1-17 Cases of discrimination, point 103(a)	13.3.1.2			
ESRS S1-17 Non-compliance with UN Guiding Principles on Business and Human Rights and OECD Guidelines, point 104(a)	13.3.1.2		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818	
ESRS 2 SBM-3-S2 Significant risk of child labour or forced labour in the value chain, point 11(b)	N/A			
ESRS S2-1 Commitments regarding policies on human rights respect, point 17	N/A			
ESRS S2-1 Policies related to employees in the value chain, point 18	N/A			
ESRS S2-1 Non-compliance with UN Guiding Principles on Business and Human Rights and OECD Guidelines, point 19	N/A			
ESRS S2-1 Due diligence strategies concerning issues covered by core International Labour Organization Conventions No. 1–8, point 19	N/A			
ESRS S2-4 Human rights-related issues and incidents related to the upstream and downstream value chain, point 36	N/A			
ESRS S3-1 Commitments regarding policies on human rights respect, point 16	N/A			
ESRS S3-1	N/A			

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE TO THE REGULATION ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR (CHAPTER NO.)	REFERENCE TO PILLAR 3 (2)	REFERENCE TO THE BENCHMARKS REGULATION (3)	REFERENCE TO THE EUROPEAN CLIMATE LAW (4)
Non-compliance with UN Guiding Principles on Business and Human Rights, ILO standards, or OECD Guidelines, point 17				
ESRS S3-4 Human rights-related issues and incidents, point 36	N/A			
ESRS S4-1 Policy concerning consumers and end-users, point 1	13.4.1.1		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818	
ESRS S4-1 Non-compliance with UN Guiding Principles on Business and Human Rights and OECD Guidelines, point 17	13.4.1.1			
ESRS S4-4 Human rights-related issues and incidents, point 35	13.4.1.1			
ESRS G1-1 United Nations Convention against Corruption, point 10(b)	13.5.1			
ESRS G1-1 Whistleblower protection, point 10(d)	13.5.1			
ESRS G1-4 Fines for breaches of anti-corruption and anti-bribery regulations, point 24(a)	13.5.2			
ESRS G1-4 Standards on anti-corruption and anti-bribery, point 24(b)	13.5.2		Annex II to Commission Delegated Regulation (EU) 2020/1816	

13.2 Environmental information – climate change [ESRS E-1][25]

13.2.1 Managing impacts, risks and opportunities

Transition Plan for climate change mitigation [E1-1]

In 2025, the Bank's Management Board approved the *"Transition Plan of the Bank Pekao S.A. Capital Group"* (hereinafter: *the "Plan"* or *the "Transition Plan"*), the purpose of which is to support the achievement of the long-term objective of the Paris Agreement, i.e. to pursue limiting the increase in the average global temperature to 1.5°C above pre-industrial levels. The Plan sets out specific targets and actions for financed greenhouse gas (GHG) emissions related to our portfolio, as well as for our own operations relating to real estate and the vehicle fleet. The Plan will be reviewed and updated in a cycle aligned with the update cycle of the Group's business Strategy and will also be covered by an internal process for monitoring progress against the targets set, at least semi-annually (by the ESG Council) and annually by the Management Board.

The Plan's decarbonisation targets support the achievement of the environmental targets set out in *the Strategy*, relating to:

- financing green projects in the amount of PLN 9 bn[26],
- developing products and a customer co-operation model supporting the sustainable transformation of business activities,
- achieving climate neutrality of the Group by 2050.

Below we present the key assumptions of the Transition Plan, split between the portfolio and own operations. We also indicate that neither the Bank nor any Group entity is an entity excluded from EU Paris-aligned benchmarks – the Group operates in the financial industry and does not conduct business activities in fossil-fuel-related industries to which the above exclusion applies.

Given that 2025 is the base year for portfolio decarbonisation targets, information on progress in implementing the portfolio Transition Plan will be disclosed starting from the report for the subsequent year, i.e. the report for 2026. As regards decarbonisation targets for our own operations, where 2024 is the base year, progress in reducing the carbon footprint for Scope 1 and Scope 2 GHG emissions is presented in the tabular disclosure E1-6 "Greenhouse gas emissions by scopes 1, 2 and 3 in the Bank and subsidiaries", in the "% 2025 / 2024" column. The observed changes in Scope 1 and Scope 2 GHG emissions levels result from decarbonisation actions undertaken in 2025, which are described in more detail in the subsection "Actions and resources in relation to climate policy [E1-3]".

All strategic initiatives are reflected in the financial planning process. The Bank's Strategy for 2025–2027 includes the objective of achieving climate neutrality by 2050, the operationalisation of which is ensured by the adopted Capital Group Transition Plan. Accordingly, the Transition Plan forms an integral element of the financial planning process.

Assumptions of the portfolio Transition Plan

The Plan was developed in accordance with the EBA Guidelines on the management of ESG risks[27]. Its overarching objective in relation to the portfolio is to manage ESG risks identified by the Bank as material in the short-, medium- and long-term perspective, in line with the overall business strategy and risk appetite. The Plan covers transition (transformation) risk, identified in the double materiality assessment process, related to climate and its impact on the Group portfolio's credit risk, as this risk is closely linked to financed exposures that may be particularly exposed to the economy's adjustment to applicable regulatory objectives relating to ESG risk, in particular EU climate policy. This is also a risk analysed through the lens of forward-looking climate scenarios containing reference target values related to decarbonisation of specific sectors, which are explicitly referenced by the EBA Guidelines.

An analysis of the rationale and feasibility of defining quantified targets for sectors financed by us and the possibility of comparing those targets with reference decarbonisation pathways derived from scientific climate scenarios was a key preparatory step prior to setting the Group portfolio's decarbonisation targets. This analysis considered the materiality of the volume of financed emissions, the monetary materiality of exposure to a given sector, an assessment of the availability of reference decarbonisation pathways, and an assessment of the availability of source data or reliable proxies, in terms of the ability to set robust, feasible and monitorable decarbonisation targets. As a result of the analysis, the Transition Plan includes two sectors prioritised for decarbonisation:

- the power generation sector; and

[25] In certain cases, the data are presented solely for the Bank as the parent entity in order to illustrate the scale of its impact on the results of the entire Group.

[26] Green financing: renewable energy sources, low-emission transportation, energy-efficient construction, energy efficiency, circular economy, biodiversity, protection against pollution, protection of water resources.

[27] Guidelines on the Management of Environmental, Social and Governance (ESG) Risks, EBA/GL/2025/01, dated 8 January 2025.

- the residential real estate sector – i.e. our mortgage loan portfolio.

For these two priority sectors of our portfolio, we have set the Transition Plan's decarbonisation targets based on GHG emissions intensity – these targets are presented in the table below.

GHG emissions reduction targets for financed emissions (Scope 3, Category 15) , including the distance between Bank's targets and the 2030 benchmark targets assumed by the reference decarbonisation pathways

SECTOR	SECTOR SCOPE	DECARBONISED GHG EMISSION SCOPES	EMISSIONS INTENSITY IN BASE YEAR 2025	TARGET EMISSIONS INTENSITY IN 2030	RELATIVE REDUCTION TARGET BY 2030 (%)	REFERENCE TARGET VALUE	BANK'S TARGET DISTANCE FROM THE REFERENCE VALUE	REFERENCE DECARBONISATION PATHWAY
Power generation	PKD 35.11-35.14	Scope 1	**0.322** t CO_2eq / 1 MWh	**0.195** t CO_2eq / 1 MWh	**-39.5%**	**0,195** t CO_2eq / 1 MWh	**0,0%**	International Energy Agency Net Zero 2050
Residential real estate	Mortgage loans	Scope 1 and 2	**58.8** kg CO_2eq / 1 m^2	**33.3** kg CO_2eq / 1 m^2	**-43.4%**	**27,8** kg CO_2eq / 1 m^2	**19,8%**	CRREM 1.5°C

When analysing our disclosed decarbonisation ambitions, it should be borne in mind that the pace of moving away from fossil fuels in Poland has a material impact on our ability to reduce the intensity of financed GHG emissions in the sectors covered by the Plan. The expected transformation of the national energy mix – with a growing share of low- and zero-emission sources – may significantly support the achievement of the Bank's climate targets and those of other financial institutions; however, this process is largely dependent on the regulatory framework.

The Plan assumes decarbonisation of GHG emissions intensity (technological decarbonisation) in the priority sectors through actively increasing our involvement in financing transformation in these areas. This implies organic portfolio growth, which may translate into an increase in the absolute volume of financed GHG emissions. This is particularly relevant for the time horizon to 2030: for power generation, we assume an increase in our engagement in financing transitional generation technologies based on natural gas, which are not zero-emission technologies; and for mortgage loans, we assume an increase in the sale of loans financing energy-efficient properties, which are generally not passive buildings (with nearly zero consumption of energy from fossil fuels). At the same time, we indicate that we have not set targets in the Plan for reducing financed GHG emissions in absolute terms.

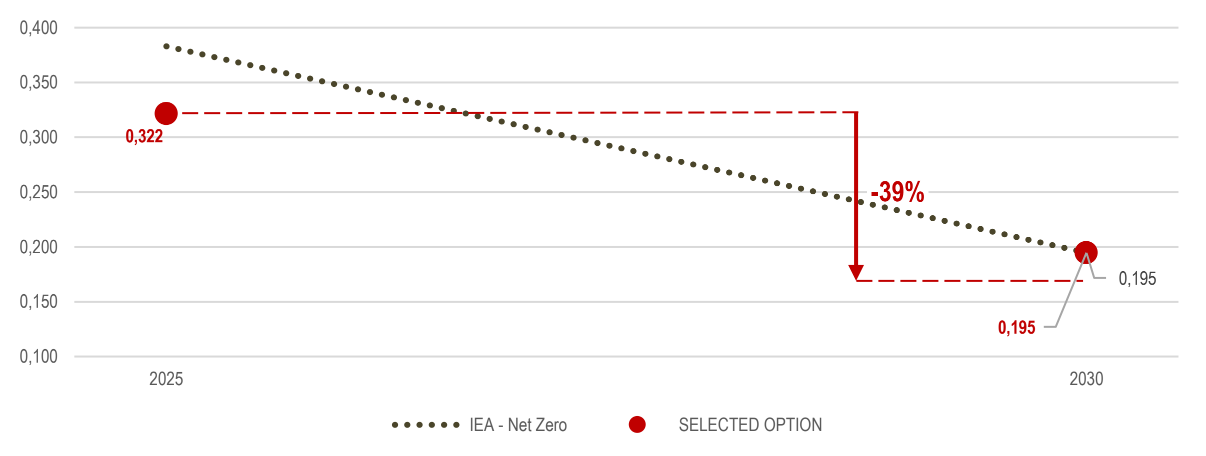
Power generation

The decarbonisation targets defined by us for the power generation industry reflect our strategic commitment to supporting the transformation of the Polish economy towards a more environmentally sustainable and long-term resilient energy mix. Financing of the power generation sector accounts for [7.15%] of our portfolio GHG emissions and for [2.53%] of our exposure in the corporate financing portfolio, and for [1.5%] of the total credit portfolio – as of 31 December 2025.

We set the decarbonisation target for this sector with reference to the "Net Zero 2050" reference decarbonisation pathway published by the International Energy Agency (IEA). This pathway assumes a reduction in the average global GHG emissions intensity from electricity generation at a pace that enables limiting the increase in the average global temperature to 1.5°C above pre-industrial level.

Our ambition is to reduce by 39.5% by 2030 (compared to 2025) the average GHG emissions intensity of generation technologies and activities in the power generation sector financed by the Bank. The target defined in this way, and the internally assumed pace of portfolio decarbonisation, will allow us to decarbonise our exposure to the power generation industry up to 2030 at a pace consistent with the model assumptions of the Net Zero 2050 climate scenario.

Pace of decarbonisation of power generation sector financing compared to the IEA Net Zero 2050 scenario



Achievement of the above decarbonisation target to 2030 is based on the following **key decarbonisation levers**:

- decarbonisation actions on the Bank's side, i.e.:
  - engagement in purpose-specific financing of transitional generation technologies based on natural gas – we plan to increase our balance-sheet exposure to natural gas to 24.7% in 2030 (relative to our total exposure to the power generation sector) and, at the same time, we do not assume providing new purpose-specific financing for generation technologies based on other fossil fuels (e.g. coal or crude oil),
  - maintaining a high level of engagement in purpose-specific financing of zero-emission generation technologies based on wind and solar energy – we plan that throughout the Plan horizon our balance-sheet exposure to these technologies will exceed 40% of our total exposure to the power generation sector,
- **decarbonisation actions at the national level (outside the Bank's control)**, expressed through the pace of implementation of the assumptions of the National Energy and Climate Plan.

In the period from 2026 to 2030, we also plan to undertake the following actions supporting achievement of the decarbonisation target for financing the power generation industry:

- improving the quality of data on purpose-specific financing and financed GHG emissions,
- building Customer Advisers' capabilities in the practical application of the Transition Plan assumptions,
- engaging customers in dialogue on potential financing needs for zero- or low-emission technologies.

For the power generation industry, we identify so-called "locked-in" greenhouse gas emissions (i.e. emissions that cannot be reduced quickly because they result from existing infrastructure, contracts and technologies) in relation to our exposure to financing the ongoing business activities of customers in this sector (non-earmarked financing, not allocated to specific generation technologies). The pace of decarbonisation of this financing depends solely on the national transformation of the power sector and is expressed in our Plan as the decarbonisation pace resulting from the National Energy and Climate Plan, i.e. a decarbonisation lever outside the Bank's control.

Achievement of the targets set out in the Plan may have a positive impact on the Bank's disclosed Green Asset Ratio within EU Taxonomy disclosures. However, the compliance of the financing granted with the EU Taxonomy technical screening criteria does not affect the targets set for power generation financing.

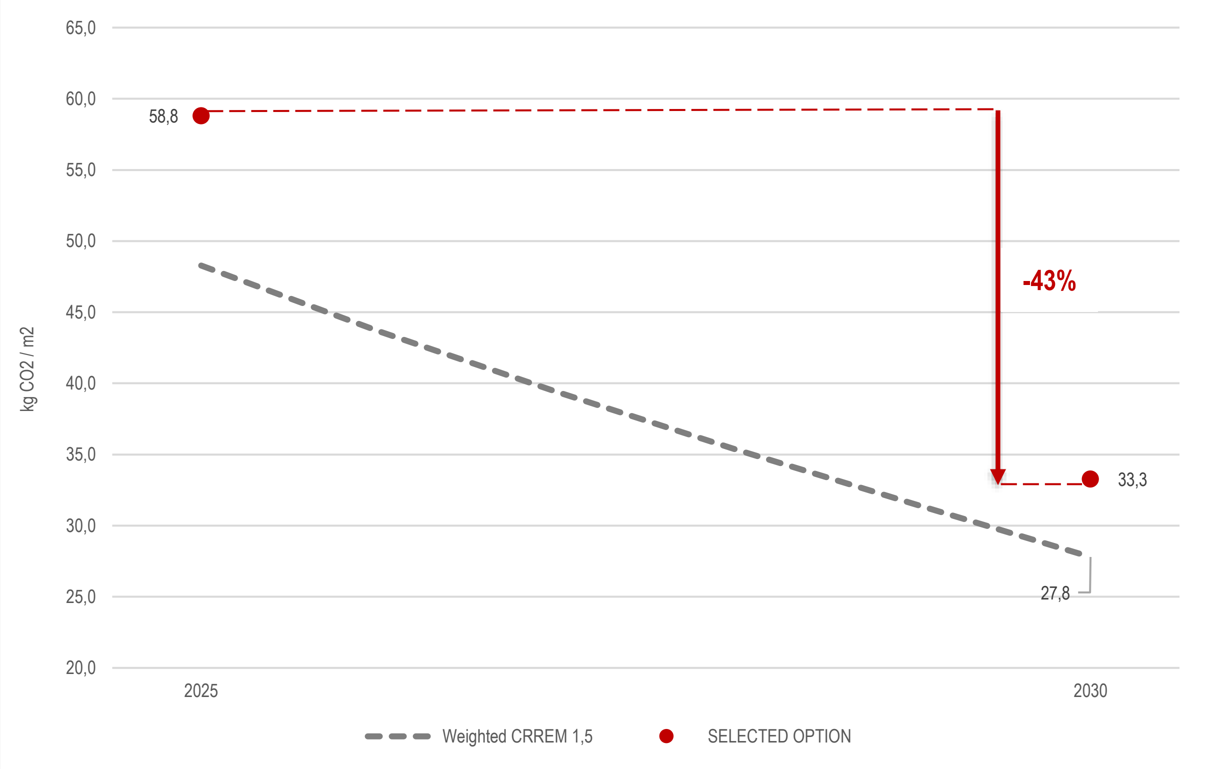
Residential real estate (mortgage loans):

Within our mortgage loan portfolio, we finance the purchase or construction of residential real estate by our Customers who are natural persons. The purchases of real estate financed by us relate to both the primary and secondary markets. Mortgage loans generate [5.83%] of our portfolio GHG emissions and account for [39.63%] of our exposure in the loan portfolio – as of 31 December 2025.

We set the decarbonisation target for residential real estate in relation to the reference decarbonisation pathway "CRREM 1.5°C" published by the recognised organisation Carbon Risk Real Estate Monitor (CRREM). This pathway assumes a reduction in the average GHG emissions intensity generated per square metre of residential real estate in Poland at a pace enabling the limitation of the increase in the average global temperature to 1.5°C compared to the pre-industrial era.

Our target is to reduce the average GHG emissions intensity of residential real estate financed by the Bank by 43.4% by 2030 (compared to 2025). This ambition and our internally assumed pace of decarbonisation over the longer time horizon will allow us to decarbonise our mortgage loan portfolio at a pace on average around 2 years slower than the reference assumptions of the climate scenario CRREM 1.5°C.

Pace of mortgage loan decarbonisation compared to the CRREM 1.5°C scenario



The achievement of the ambition described above by 2030 is based on the following **key decarbonisation levers**:

- **decarbonisation actions on the Bank's side, i.e.:**
  - a gradual increase in the share of mortgage loan sales aligned with the technical screening criteria of the Taxonomy,
  - a gradual increase in the share of loan sales for energy-efficient and highly energy-efficient properties; implementation of a cap on the share of energy-intensive exposures in new sales,
- **decarbonisation actions at the national level (outside the Bank's control)**, expressed through:
  - the planned reduction of the maximum allowable indicator of demand for non-renewable primary energy, pursuant to building regulations, for buildings constructed from 2030,
  - the pace of implementation of the assumptions of the National Energy and Climate Plan.

In the period from 2026 to 2030, we also plan to undertake the following actions supporting the achievement of our decarbonisation target for mortgage loans:

- improving the quality of data on the energy efficiency of financed properties,
- building the competencies of Customer Advisers in the practical application of the assumptions of the Transition Plan and in the area of regulations concerning the energy efficiency of buildings.

With respect to mortgage loans, we identify so-called locked-in greenhouse gas emissions (i.e. emissions that cannot be reduced quickly because they result from already existing infrastructure, contracts and technologies) in relation to the financing of multi-family properties on the secondary market, particularly for properties using district heating. The pace of decarbonisation of these properties depends largely on the national transformation of the power and district heating sectors, i.e. decarbonisation levers outside the Bank's control.

Assumptions of the Transition Plan for own operations

In the ESG risk materiality analysis performed in 2025, we did not identify environmental risks related to own operations as material. Nevertheless, due to the strategic ambition to build the image of a sustainable and environmentally responsible institution and the need to address the disclosure requirements in this area, we decided to include GHG emissions from own operations in our Transition Plan.

Our Transition Plan for own operations focuses on Scope 1 and Scope 2 emissions, over which we have real control. For these scopes, we also carried out a preliminary preparatory analysis aimed at identifying the most material sources of GHG emissions – these are:

- Scope 1 and Scope 2 emissions generated by our properties from electricity and from the use of refrigerants – they account for more than 85% of the carbon footprint in Scope 1 and 2 on a location-based basis and just under 80% on a market-based basis, and
- Scope 1 emissions generated by fuel combustion in our vehicle fleet – they account for approx. 12% of the carbon footprint in Scope 1 and 2 on a location-based basis and 18% on a market-based basis.

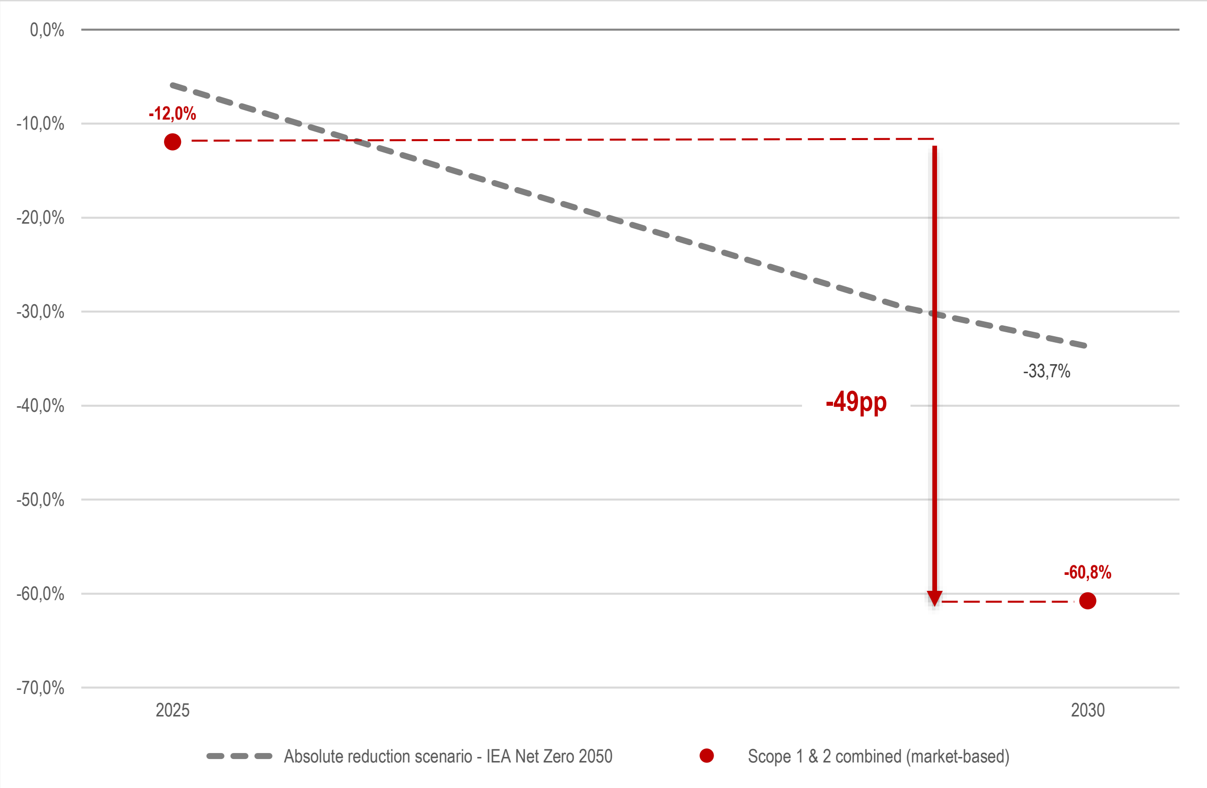
As a result, **we decided to set quantified decarbonisation targets for Scope 1 and 2 emissions resulting from electricity and heat consumption in our properties, and for Scope 1 emissions resulting from fuels combusted by our vehicle fleet.** Decarbonisation targets were defined as targets for the reduction of absolute emissions. Additionally, for properties, a target based on GHG emission intensity per m² of our office space was set.

Overall decarbonisation targets for Scope 1 and 2 GHG emissions

EMISSION SCOPE	EMISSIONS IN THE BASE YEAR 2024	TARGET EMISSIONS IN 2030	RELATIVE REDUCTION TARGET BY 2030 (%)	REFERENCE DECARBONISATION PATHWAY
Scope 1	**8,820** t CO_2eq	**6,291** t CO_2eq	**-28.7%**	International Energy Agency Net Zero 2050
Scope 2 (location-based)	**39,309** t CO_2eq	**12,774** t CO_2eq	**-67.5%**	
Scope 2 (market-based)	**23,334** t CO_2eq	**6,321** t CO_2eq	**-72.91%**	
Scope 1 and 2 total (location-based)	**48,129** t CO_2eq	**19,065** t CO_2eq	**-60.4%**	
Scope 1 and 2 total (market-based)	**32,154** t CO_2eq	**12,612** t CO_2eq	**-60.8%**	
IEA Net Zero 2050 absolute reduction scenario	**x**	**x**	**-33.7%**	

The Transition Plan assumes a reduction in the absolute level of GHG emissions in Scopes 1 and 2 at a pace more ambitious than that resulting from the model scenario “Net Zero 2050” published by the International Energy Agency (IEA). This is possible primarily due to the assumptions adopted by the Bank’s Property Modernisation Plan, which provides for a reduction of the Bank’s office space. Details of the assumed decarbonisation levers are presented in the further part of the disclosure.

Decarbonisation pathway for Scope 1 and 2 GHG emissions of the Pekao Group compared with the IEA Net Zero 2050 scenario



Properties

We have set decarbonisation targets for our properties in two approaches:

- in terms of absolute emissions reduction, and
- in terms of reducing GHG emissions intensity per m^2 of properties.

The targets expressed as absolute emissions reductions are compared with the reference "Net Zero 2050" scenario published by the International Energy Agency (IEA). This scenario assumes a reduction in global GHG emissions (starting from 2023) at a pace consistent with limiting the increase in the global average temperature to 1.5°C above pre-industrial levels. We present these targets in the table below.

Absolute GHG emissions reduction targets for Scope 1 and 2 emissions from properties

SOURCES OF EMISSIONS	DECARBONISED GHG EMISSION SCOPES	EMISSIONS IN THE BASE YEAR 2024	TARGET EMISSIONS IN 2030	RELATIVE REDUCTION TARGET BY 2030 (%)	REFERENCE DECARBONISATION PATHWAY
Energy consumption in properties	Scope 1 and 2 (location-based)	**42,129** t CO_2eq	**13,951** t CO_2eq	**-66.9%**	International Energy Agency Net Zero 2050
	Scope 1 and 2 (market-based)	**26,155** t CO_2eq	**7,498** t CO_2eq	**-71.3%**	
IEA Net Zero 2050 absolute reduction scenario	**x**	**x**	**x**	**-33.7%**	

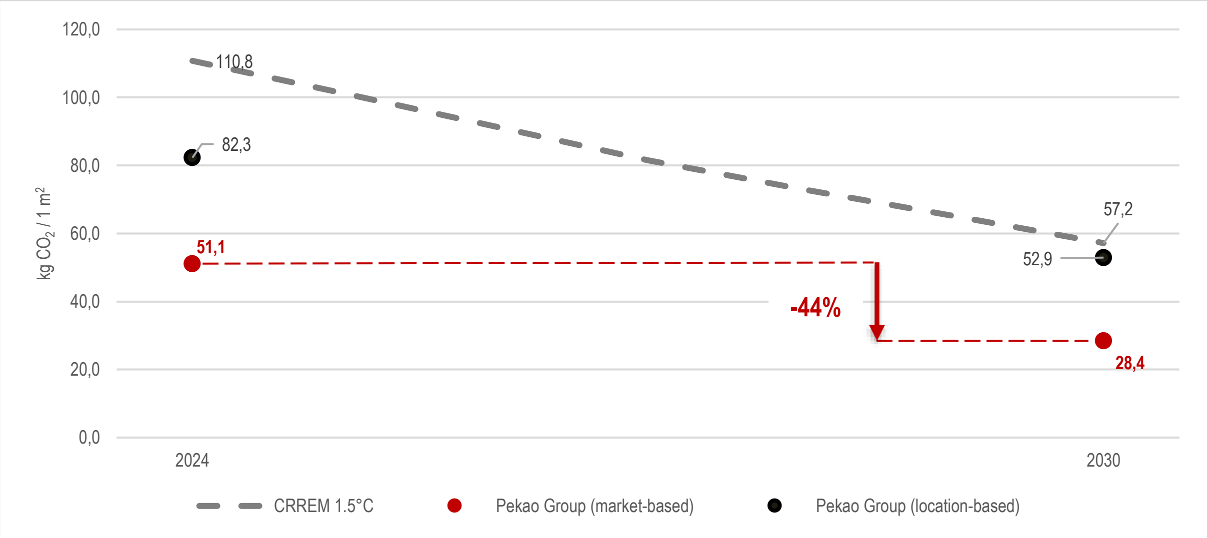
Decarbonisation targets expressed as reductions in GHG emissions intensity per m^2 of properties were set relative to the reference decarbonisation pathway "CRREM 1.5°C" published by the recognised organisation Carbon Risk Real Estate Monitor (CRREM). We present these targets in the table below.

Targets based on GHG emissions intensity per m² of office floor area

SOURCES OF EMISSIONS	DECARBONISED GHG EMISSION SCOPES	EMISSIONS IN THE BASE YEAR 2024	TARGET EMISSIONS INTENSITY IN 2030	RELATIVE REDUCTION TARGET BY 2030 (%)	REFERENCE DECARBONISATION PATHWAY
Energy consumption in properties	Scope 1 and 2 (location-based)	**82.3** kg CO_2eq / 1 m²	**52.9** kg CO_2eq / 1 m²	**-35.7%**	CRREM 1.5°C
	Scope 1 and 2 (market-based)	**51.1** kg CO_2eq / 1 m²	**28.4** kg CO_2eq / 1 m²	**-44.3%**	

In the chart below we compare our property decarbonisation targets with the CRREM 1.5°C model decarbonisation pathway. Already in the base year, the emissions intensity of our properties is lower than assumed under the CRREM 1.5°C scenario. By 2030, we expect to decarbonise our properties at a pace that will allow us to achieve targets more ambitious than those assumed in the CRREM 1.5°C scenario.

Comparison of intensity-based decarbonisation targets with the CRREM 1.5°C pathway



Our assumptions regarding decarbonisation of properties within Scope 1 and 2 of our operational GHG emissions are more ambitious than the reference pathways under scenarios assuming limitation of global warming to 1.5°C.

This is primarily possible thanks to the following decarbonisation levers adopted by us:

- **Decarbonisation measures on the Bank's side:**

– reduction and modernization of the Bank's office floor area,

– increasing the share of purchased electricity covered by renewable energy guarantees of origin and renewable PPAs.

- **Decarbonisation measures on the national side (outside the Bank's control),** expressed through the pace of implementation of the assumptions of the National Energy and Climate Plan.

In the period from 2026 to 2030, we also plan to take the following measures supporting achievement of the above decarbonisation targets:

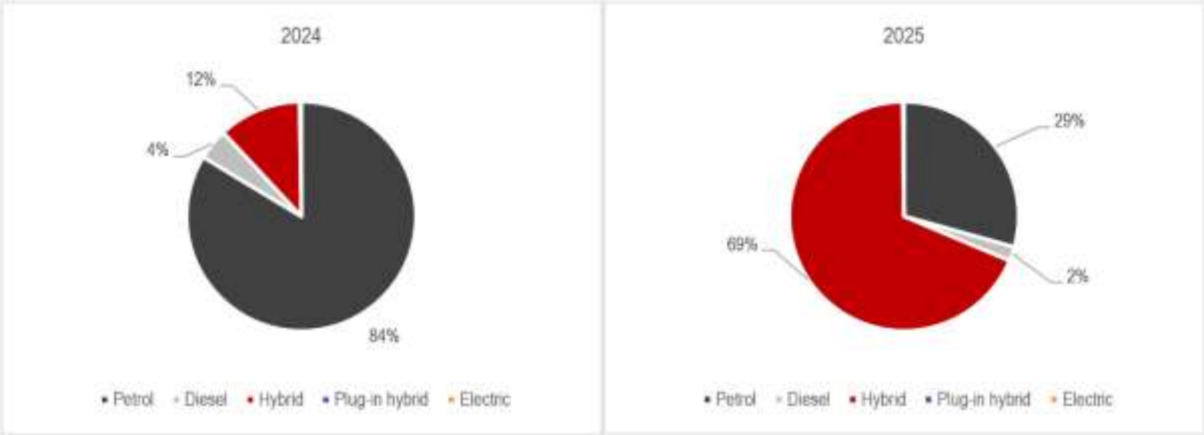
- improving the quality of data on GHG emissions from district heating,
- training the employees of the Bank and the Pekao Group responsible for property management and energy-related contracts in the assumptions of the Transition Plan.

For our properties, we do not identify so-called locked-in GHG emissions.

Fleet of company vehicles

As of 31 December 2024, company vehicles in our Group were mainly petrol-powered vehicles. In 2025, we made a strategic decision to decarbonise our fleet by replacing more than one thousand petrol vehicles with hybrid vehicles. As a result, at the end of 2025, 69% vehicles were hybrid vehicles and 29% were petrol vehicles.

Structure of the Pekao Group's company-vehicle fleet by powertrain at year-end 2024 and 2025



Under our Transition Plan, we assume maintaining the strategic direction of fleet decarbonisation initiated in 2025. The key decarbonisation lever in this respect is increasing the share of hybrid vehicles in the Group's company-vehicle fleet to 80% by 2030. Due to infrastructure-related and performance/cost challenges associated with electric vehicles, our first Transition Plan does not assume increasing their share in the fleet. We do not rule out revisiting this assumption in future updates of the Plan as technology progresses in this area. We compare the fleet decarbonisation target expressed as absolute emissions reduction with the reference "Net Zero 2050" scenario published by the International Energy Agency (IEA). This target is presented in the table below.

Absolute GHG emissions reduction target for Scope 1 and 2 emissions from the vehicle fleet

SOURCES OF EMISSIONS	DECARBONISED GHG EMISSION SCOPES	EMISSIONS IN THE BASE YEAR 2024	TARGET EMISSIONS IN 2030	RELATIVE REDUCTION TARGET BY 2030 (%)	REFERENCE DECARBONISATION PATHWAY
Fuel consumption of fleet vehicles	Scope 1	**6,000** t CO_2eq	**5,114** t CO_2eq	**-14.8%**	International Energy Agency Net Zero 2050
IEA Net Zero 2050 absolute reduction scenario	**x**	**x**	**x**	**-33.7%**	

With respect to our vehicle fleet, we identify so-called locked-in GHG emissions (i.e., emissions that cannot be reduced quickly because they result from already existing infrastructure, contracts or technologies) arising from three factors:

- due to the need to maintain the operational efficiency of our organisation, we do not assume reducing the number of company vehicles in the Plan,
- due to infrastructure-related and performance/cost constraints, we do not assume increasing the share of electric vehicles in the fleet in the Plan,
- hybrid vehicles will burn fuel and thus generate Scope 1 GHG emissions; any reduction will depend, in particular on technological progress in the fuel efficiency of such vehicles.

Policies related to climate change mitigation and adaptation [E1-2]

We integrate climate aspects into our internal regulatory architecture and implement them across individual areas of how the organisation operates as factors supporting sustainable development. Most internal regulations refer not only to climate-change aspects but are directly linked to the natural environment, social issues and corporate governance. The regulations outlined below address the mitigation and adaptation aspects identified in the IRO process, both with respect to our own operations and the management of our credit and investment exposure portfolio.

As at year-end 2025, we did not have a single document fulfilling the role of a climate policy shaping the Bank's approach to aspects related to mitigation and/or adaptation to climate change and to leveraging market opportunities resulting from the transformation of the economy towards sustainable development. Qualitative and quantitative targets, as well as implementation pathways together with procedures for monitoring and managing climate risks and opportunities in relevant areas, are dispersed across internal documents of varying rank – from the Strategy published in April 2025 and the Transition Plan operationalising the climate targets, to internal guidelines on the identification and monitoring of transactions.

When shaping selected internal regulations, we rely on external standards and market norms, in particular market best practices, which we indicate each time in the description of the relevant regulation.

As part of the double materiality assessment, we identified the main groups of internal and external stakeholders that have the greatest impact on the entity's operations. Among internal stakeholders, the most important for us are employees and employee/trade union organisations; among external stakeholders – shareholders, customers, banking-sector supervisory and regulatory authorities, as well as our suppliers and business partners. We do not conduct thematic consultations for the purpose of setting targets and directions for the regulations forming the internal rules that make up the climate policy; however, we remain in ongoing dialogue with internal and external stakeholders through channels appropriate for a given group (e.g., the General Meeting of Shareholders, results conferences, participation in industry associations, internal communications). In the process of creating relevant regulations, appropriate operational units are involved each time from a competence perspective.

All of the above regulations are internal and take into account the interests and proposals of key stakeholders in a given area (e.g., employees and employee organisations). At the same time, as a rule, these regulations are not discussed with external stakeholders and are not made publicly available in their full wording. The key provisions of selected documents are published on dedicated pages of the Bank's website (e.g., **[*the Strategy*]**).

The overriding document supporting the identification of opportunities related to climate change mitigation and adaptation and indicating possibilities to reduce our adverse impact on the climate, is *the Strategy*. ESG is an integral part of our business strategy; however, *the Strategy* itself does not establish targets, directions of action and development in the form required by regulatory solutions introduced by the European Sustainability Reporting Standards defining specific characteristics for these elements.

The Strategy sets our directions of action both in the field of our own operations and with respect to credit and investment activity. The final wording of *the Strategy* is the result of dialogue among the Bank's internal stakeholders. The document was adopted by the Management Board and approved by the Supervisory Board and made available to our stakeholders on the **[Bank's website]**. The fulfilment of strategic commitments in the sustainable development area is monitored by the ESG Council, comprising members of the Management Board and designated operational units. The achievement of key targets set out in *the Strategy* in relation to climate change and adaptation is communicated to stakeholders in annual non-financial reports.

In the context of climate change mitigation and preventing further change, the calculation and monitoring of the carbon footprint in Scopes 1 and 2 and in the supply chain (Scope 3, categories 1–14) remain an important element. To this end, the Bank implements several initiatives, including the introduction of environmentally friendly improvements at Bank locations, helping to optimise their operation and contributing to reduced consumption of energy and consumable materials.

For credit and investment activities (Scope 3, category 15), we see *the Strategy* as offering the greatest opportunities to leverage our business opportunities by increasing activity in the area of:

- financing green projects, including investments in renewable energy sources,
- low-emission transport,
- energy-efficient construction,
- energy efficiency,
- circular economy,
- biodiversity,
- protection against pollution and protection of water resources, and
- developing products supporting the transformation of customers.

To better identify the effects of our actions and their impact on the scale of financed emissions, we also continue calculating the carbon footprint of the loan and investment portfolio (Scope 3, category 15).

We use our business capabilities to support activities related to mitigation and adaptation processes. We help customers – both in the retail segment and in corporate and enterprise banking – to reduce the environmental impact of their activities and adapt to new climate conditions. We implement these activities through the development of products and cooperation models. We see significant potential in developing solutions supporting climate change mitigation and in creating adaptation projects that support climate transformation. We also participate in government and EU programmes concerning these activities.

Own operations and supply chain

The climate policy relating to own operations and the supply chain, in addition to the general direction indicated by *the Strategy*, is described in the following documents:

- *the Energy Consumption Optimisation Policy in Bank Polska Kasa Opieki Spółka Akcyjna*, relating to climate change mitigation in the day-to-day functioning of Bank employees,
- *the Procurement Policy in Bank Polska Kasa Opieki Spółka Akcyjna*, integrating ESG factors into the procurement process,
- *the Supplier Code of Ethics of Bank Pekao S.A.*, relating to suppliers' own practices with respect to climate change mitigation.

The Bank has guidelines that support our efforts to reduce our adverse impact on the climate in the area of own operations (e.g., energy consumption management) and selected aspects of the supply chain (*Supplier Code of Ethics*). In December 2025, we adopted *the Transition Plan* for the Pekao Group, covering both the loan and investment portfolio and our own operations. The decarbonisation targets established by us for our own operations are described in more detail in chapter E1-1. In 2025 itself, we did not have specific regulations implementing our strategic, long-term decarbonisation ambitions set for our own emissions (Scopes 1 and 2). As *the Transition Plan* was adopted at the end of 2025, the relevant internal regulations and guidelines will be adjusted to our articulated ambitions to best support our efforts.

Energy consumption management

Since 2019, the Bank has had in place the Management Board-approved *Energy Consumption Optimisation Policy in Bank Polska Kasa Opieki Spółka Akcyjna*, setting out principles and guidelines for the rational management of energy as part of operating activities; its overarching purpose is to minimise adverse impacts on the natural environment and support efforts to counteract climate change.

The Policy promotes efficient resource management, including the properties and technical equipment used in the Bank's operations. Its guidelines cover, among other things, optimising energy consumption in buildings, implementing energy-saving solutions and the responsible use of infrastructure. By implementing these measures, we contribute to reducing greenhouse gas emissions from the Bank's own operations. The owner of the document is the Real Estate Department, which is responsible for updates and oversight of correct implementation of the adopted principles. The regulations contained in the Policy apply to all employees of our Bank and organisational units that perform tasks related to the management and maintenance of owned and leased properties, as well as units responsible for the procurement of equipment and user furnishings.

Bank Pekao S.A. Supplier Code of Ethics and Procurement Policy

We seek to embed environmental considerations – particularly measures aimed at limiting adverse impacts on climate change – into the processes for establishing and maintaining cooperation with external parties, including suppliers. These matters are governed primarily by two documents: *the Procurement Policy of Bank Polska Kasa Opieki Spółka Akcyjna* (hereinafter: *the Procurement Policy*), updated in 2024, and *the Bank Pekao S.A. Supplier Code of Ethics* (hereinafter: *the Supplier Code of Ethics*), which is available in full on our website at **[*Supplier Code of Ethics*]**.

The Supplier Code of Ethics supplements the Bank's internal regulations and includes, inter alia, provisions promoting climate change mitigation as well as compliance with social and corporate governance factors. Under the document, each supplier is required to submit a declaration confirming that it has familiarised itself with, and will comply with, the provisions contained therein.

By implementing the above principles, the Bank seeks to build a responsible and sustainable supply chain in which environmental, social and ethical aspects form an integral part of business relationships. Further information on both documents is provided in section **[ESRS G1]**.

Management of climate and ESG risk in the loan and investment portfolio

One of the development directions set out over *the Strategy's* horizon is the refinement of existing solutions and the introduction of new solutions and tools supporting the assessment of our clients' ESG risk. With respect to managing sustainability risk within the loan and investment portfolio, we are further developing existing internal regulations and process guidelines so that they support the delivery of our strategic ambitions and align with regulatory requirements and market practice.

Credit Risk Strategy and Credit Risk Policy

In the area of lending and investment activity, matters relating to managing business opportunities linked to climate change adaptation or mitigation, as well as to minimising our adverse impact on the climate, are governed and embedded within the credit process – at a scope and scale commensurate with the customer segment and the type of financed transaction – by a number of internal regulations, with the key documents being *the Credit Risk Strategy* (approved by the Supervisory Board) and *the Credit Risk Policy* (approved by the Management Board).

The objectives of these regulations are:

- effective management of credit risk within the Bank and the Pekao Group;
- integration of ESG risk (including climate change risk) into the credit process.

The Credit Risk Policy complements *the Credit Risk Strategy* by focusing on the assumptions and guidelines for credit risk, including ESG factors. The provisions of *the Credit Risk Policy* and *the Credit Risk Strategy* cover all units involved in transaction origination and assessment, as well as in risk management and the credit portfolio. The owner of the above regulations is the Integrated Risk Management Department.

Both *the Credit Risk Strategy* and *the Credit Risk Policy* support limiting our adverse impact on climate change processes. As a general rule, we do not provide financing for new projects and we limit other financing in sectors classified as high-emitting, such as hard coal and lignite mining, the generation of electricity and heat using hard coal and lignite, the provision of services supporting hard coal and lignite mining and extraction, and the manufacture of machinery and equipment for coal mining. Exceptions apply to projects supporting the transition in the Polish energy sector.

The Credit Risk Policy is accompanied by a set of detailed regulations dedicated to the identification and assessment of risk in the sustainability area, in particular climate risk, in relation to strategic and corporate clients, small and medium-sized enterprises, business clients, and the financing of local government units. These regulations enable us, inter alia, to identify high- or medium-emitting portfolios and exposures and thus assess the potential for managing the portfolio's carbon footprint so as to limit our impact on climate change.

In addition, we regulate ESG risk management processes by means of a dedicated procedure approved by the Vice President overseeing the Risk Management Division, owned by the Risk Strategy and Development and ESG Department. The regulation sets out, inter alia, activities for identifying ESG risk and the methods and tools used to measure and control it. In particular, the procedure governs the operation of a strategic limit relating to green financing for the Bank and the Pekao Group, understood as the minimum percentage share of green financing within the financing portfolio.

The regulation also introduces a range of internal indicators supporting the monitoring of exposure to high-emitting financing (in the field of fossil fuels and energy generation from fossil fuels) as well as the intensity of greenhouse gas emissions within the financing of the corporate and enterprise portfolio. The procedure also introduces and governs the mechanisms for climate stress testing in the area of credit risk and sets out methods for identifying ESG risk at the level of economic sectors.

The detailed regulations also serve an informational and educational role by describing the key aspects of ESG risk, including climate (transition risk and physical risk) and environmental risk; defining the concepts of green (sustainable) and brown (high-emitting) finance; and specifying the scope of information and data used in the ESG risk assessment process in respect of an individual exposure. Relevant parties cooperating in the operation of the credit process participate in establishing and implementing the content of the credit regulations. We make selected information relating to the Bank's ESG risk appetite available to external stakeholders.

Responsibility for implementing and amending the regulations follows from the Bank's internal regulations and is assigned to the Risk area. In addition, the regulation also specifies the manner and scope of ESG risk information and data provided by Pekao Group companies to the Bank.

Sustainable Finance Framework Pekao S.A.

In the area of products and client cooperation, responding to market needs and capturing the related opportunities is of key importance. Since 2023, the Bank's investment policy has been governed by the Sustainable Finance Framework Pekao S.A. (hereinafter: *the Framework*). This document not only provides an issuance framework for the Bank's own sustainable bonds but also sets out the conditions that must be met for the subject matter of an investment transaction entered into with a client to be considered sustainable in environmental or social terms.

The issuance framework, which has received a positive Second Party Opinion (SPO) from an independent third party, Sustainalytics, is made publicly available on the Bank's website, ensuring transparency for all stakeholders. Responsibility for managing the process governed by the Framework follows from the Bank's internal regulations and is linked to the Corporate Banking, Markets and Investment Banking area and the Enterprise Banking Division.

The Framework enables eligible investments to be financed using funds raised from EMTN bonds issued by the Bank. The document describes the project selection process, impact management, and the allocation of proceeds and impact reporting. For the specified types of economic activity, the criteria for classifying eligible projects in the area of climate change mitigation are based on selected technical screening criteria of the EU Taxonomy (in accordance with Annex I to Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021). The Framework is aligned with international market best practice:

- the Green Bond Principles of June 2021 (as updated in June 2022);
- the Social Bond Principles of June 2023;
- the Sustainability Bond Guidelines of June 2021 published by the International Capital Market Association;
- the Green Loan Principles of February 2023;
- the Social Loan Principles of February 2023 published by the Loan Market Association.

Offering green products

The operating principles for green products, or products supporting sustainable finance, depend on the type of product offered and the client segment:

- for individual customers and consumer loans, the offering is governed by the Act of 20 May 2016 on energy efficiency, which introduces a national final energy savings target to be achieved by the end of 2030 of 5,580 thousand toe, implemented from 1 January 2021 to 31 December 2030. The 2030 target will be delivered, inter alia, through the system of energy efficiency certificates;
- for enterprises, we use the European Funds for a Modern Economy Programme operating under the Act of 14 March 2003 on Bank Gospodarstwa Krajowego;
- financing for corporate clients is governed, inter alia, by the Sustainable Finance Framework, which was prepared in accordance with applicable international standards published by ICMA and the LMA (as described above), as well as on the basis of an individual offer tailored to the Client's needs and market standards.

Minimum reporting requirements for policies:

POLICY NAME	LINK TO IRO	APPROVING BODY	SCOPE (BANK/GROUP)
Transition Plan for the Capital Group of Bank Pekao S.A.	Climate change mitigation	Management Board of the Bank	Group
Bank Pekao Strategy for 2025–2027	Climate change mitigation	Supervisory Board	Group
Policy on optimising energy consumption in Bank Polska Kasa Opieki Spółka Akcyjna	Climate change mitigation	Management Board of the Bank	Bank
Procurement Policy in Bank Polska Kasa Opieki Spółka Akcyjna	Climate change mitigation	Management Board of the Bank	Bank
Bank Pekao S.A. Supplier Code of Ethics	Climate change mitigation	Management Board of the Bank	Bank
Credit Risk Strategy	Climate change mitigation	Supervisory Board	Group
Credit Risk Policy	Climate change mitigation	Management Board of the Bank	Group
Sustainable Finance Framework Pekao S.A.	Climate change mitigation	Sustainable Finance Committee	Bank

Actions and resources related to climate policy [E1-3]

Having regard to *the Strategy*, which assumes the achievement of climate neutrality by 2050 and support for clients in their transition, the key actions undertaken by us in 2025 in relation to climate policy concerned both our own operations and our lending and investment activities.

We developed a Transition Plan, which operationalises the ambitions set out in *the Strategy*. The reduction targets defined in the Transition Plan were linked to actions constituting decarbonisation levers and to a broad set of monitoring indicators, together with the governance and monitoring structure for the Plan.

Actions relating to our own operations were focused primarily on climate change mitigation and were aimed at reducing our carbon footprint in Scopes 1 and 2. The most material actions in relation to the lending and investment portfolio consisted in offering financing linked to the management of sustainable development risks and opportunities in the area of climate change mitigation and adaptation to climate change.

Actions relating to our own operations were conducted within day-to-day Bank's activities.

We did not identify any incidents in which the conduct of our own operations or the financing of clients would have resulted in material harm incurred by third parties. Accordingly, no supporting or compensatory measures were undertaken.

Own operations

Pursuant to Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, and having regard to the nature of our activity as a financial institution, the Bank's capital expenditure (CAPEX) and operating expenditure (OPEX) are not subject to an assessment as to eligibility or alignment with the EU Taxonomy's sustainable development criteria (including the use of nature-based solutions, engineering solutions or dedicated technological solutions). The expenditure and outlays incurred by us in our own operations during the period covered by the Strategy are also not financially material from the perspective of the entity's operations. We apply a prudent approach aimed at avoiding classification errors and the risk of greenwashing, as well as the inability to directly translate the outlays and expenditure incurred into the implementation of the directions of actions and assumptions of climate policy. Where it is possible to reliably identify relevant actions and the related outlays, we will disclose the respective amounts in subsequent years.

In 2025, we carried out initiatives consistent with the Bank's strategic assumptions at our locations, aimed at limiting the negative impact on climate change and supporting climate change adaptation processes. The most important of these include:

- reducing the floor area of properties by 9.7% compared to 2024,
- covering part of the volume of purchased electricity with guarantees of origin for energy from renewable sources. The volume of energy covered by the certificate in 2025 amounted to 28,242 MWh,
- improving the energy efficiency of properties and the emissions intensity compared to 2024 by 7.4% (in accordance with the market-based method) and 5.9% (in accordance with the location-based method),
- decarbonising the vehicle fleet by increasing the share of hybrid vehicles in the fleet from 12% to 69%.

In addition, in 2025 we carried out an issuance of our own ESG bonds in the amount of EUR 500 million (PLN 2,127.6 million at the NBP exchange rate as of 21 September 2025).

Lending and investment activities

Taking into account the specific nature of a financial institution's business, the allocation of significant funds to finance Poland's energy transition and the adjustment of our product offering to changing demand for financial products, whether directly linked to investment objectives or provided through sustainability-linked financing structures, are the most important actions to support sustainable development, particularly climate change mitigation and adaptation. Our strategic priority is – as mentioned earlier – to develop products and a model of cooperation with clients that supports the transformation of their business activities, as well as to develop educational activity for clients. As *the Transition Plan* was adopted by the Management Board in December 2025, the actions reported by us as at the end of 2025 were not yet linked to potential reductions in financed emissions in 2025. However, these actions were considered leading decarbonisation levers in the lending and investment portfolio even prior to the adoption of *the Transition Plan*. Basic information on the products and financial solutions offered is made available by the Bank to external stakeholders on its website.

Sustainable financing for corporate, investment and enterprise banking clients

In 2025, we published *the Strategy*. One of the assumptions of the document is to finance green projects in the amount of PLN 9 billion. Green financing comprises renewable energy sources, low-emission transport, energy-efficient construction, energy efficiency, the circular economy, biodiversity, protection against pollution, and the protection of water resources.

In 2025, we provided green financing with a total value of PLN 8,492,232,930. In addition, we supported the issuance of our clients' ESG bonds in the amount of PLN 2,300 million. In September 2025, under the EMTN programme, the Bank again issued green bonds with a nominal amount of EUR 500 million (XS3185322909). The issuance is based on the Sustainable Finance Framework in force at the Bank since 2023. Investors also included the IFC (International Finance Corporation), part of the World Bank Group, with which Bank Pekao officially entered into a long-term partnership at the beginning of September. The funds invested by the IFC will be allocated to sustainable investments, in particular in the area of sustainable water management.

Supporting initiatives

Achieving environmental objectives requires not only internal commitment, but also openness to cooperation. Therefore, we actively engage in ESG initiatives, establishing partnerships that support the transformation of the economy and strengthen our actions for sustainable development.

- *GREENPACT European ESG Summit Congress* – National Chamber of Commerce (Krajowa Izba Gospodarcza):

Once again, we acted as the Gold Partner of the *GREENPACT European ESG Summit* Congress, organised by the National Chamber of Commerce on 24–25 November 2025. Four representatives of the Bank took part as panellists; additionally, we hosted one panel devoted to financing the energy transition.

The Congress was addressed to a broad group of participants: representatives of business, investors, scientists, public administration and social activists. In 2025, the Congress focused on the role of the green transition in building competitiveness and on the importance of voluntary business engagement in sustainable development.

- *ESG Standard Platform* – National Chamber of Commerce (Krajowa Izba Gospodarcza):

We act as a substantive partner for the *ESG Standard Platform* run by the National Chamber of Commerce. As part of the cooperation, we develop a section devoted to financial matters, publishing monthly articles.

The actions are mainly aimed at companies from the SME sector seeking support in implementing sustainable development principles, as well as large enterprises managing extensive supply chains.

The outcome of the partnership in 2025 included the development of a dedicated finance section, the organisation of a thematic webinar, the participation of a National Chamber of Commerce expert in events organised by the Bank, and monthly promotion of materials in the social media of ESG Standard and National Chamber of Commerce. A representative of the Bank also participated in the work of the ESG Committee.

- *Guide to Sustainable Energy Transition* – Polish ESG Association (Polskie Stowarzyszenie ESG):

We were invited to cooperate on the project *"Guide to Sustainable Energy Transition"* as a substantive partner responsible for developing a chapter devoted to financing the energy transition. The publication was addressed to companies operating in various sectors – from SMEs to large manufacturing plants. The project involved representatives of private enterprises, public institutions and government agencies (such as PARP (Polish Agency for Enterprise Development), NFOŚiGW (National Fund for Environmental Protection and Water Management) and PAIH (Polish Investment and Trade Agency)).

The outcome of the partnership included, among other things, the publication of a chapter devoted to financing issues in *the Guide to Sustainable Energy Transition* and the possibility of using the guide in the Bank's educational and promotional activities. The guide's premiere took place in November 2025.

- *Ziemianie Atakują! – Nowe narracje (Humans Attack! - New Narratives):*

We assumed the role of the main patron of the *"Ziemianie Atakują! – Nowe narracje"* project, supporting actions related to the energy transition. The partnership focused on promoting good practices in reducing energy consumption, reducing emissions and developing low-emission energy sources.

The initiative was aimed at entities implementing transformation objectives in the energy sector, including enterprises implementing pro-environmental solutions.

The outcome of the cooperation included conducting research, organising workshops, and developing a free communications guide for companies involved in the energy transition. The partnership also covered promotional activities in social media, press publications, meetings with editorial teams, and mailings to a base of approximately 8,000 recipients. The project's pre-premiere took place during PRECOP in Katowice, and the premiere took place in November 2025.

- *Green Bonds: From trends to practice – Warsaw Stock Exchange (GPW):*

In April 2025, the Bank's experts led workshops "Green Bonds: From trends to practice" organised by the Warsaw Stock Exchange (GPW). The event was addressed to people interested in deepening their knowledge of green and sustainable bond issuance. During the workshops, we presented the latest market statistics and trends, discussing experiences related to issuing green bonds both in the domestic and international markets. We also presented practical case studies enabling a full understanding of the preparation and execution of an issuance – including the implementation of a green bond framework and the process related to a Second-Party Opinion.

- *Guide for issuers on green bond issuance – Warsaw Stock Exchange (GPW):*

At the invitation of the Warsaw Stock Exchange (GPW), the Bank's experts provided substantive support in developing the *"Guide for issuers on green bond issuance"*. The initiative aimed to educate capital market participants on issuance standards and legal and regulatory requirements. The publication provided a practical overview of the green bond issuance process, including detailed guidance on financing pro-environmental projects, defining environmental objectives, linking proceeds to specific investments, and the reporting process, ensuring compliance with sustainable development principles.

Retail customer financing

In the retail customer segment, we implement the assumptions of *the Strategy* by introducing products dedicated to pro-environmental objectives, which respond to the needs of the market for financing for natural persons. The Bank maximises its business opportunities in this area by continuing to offer:

- Loan – a cash loan with a 0% commission and a reduced margin/interest rate, where the customer uses it for ECO purposes connected with the purchase/installation of, inter alia, renewable energy sources like solar collectors, photovoltaic panels/cells including energy storage, central heating boilers (excluding coal-fired boilers and boilers fuelled by "eco-pea coal"), heat pumps and geothermal heating systems, electric or hybrid vehicles, household bio sewage treatment plants, heat recovery ventilation, domestic water treatment stations for own water intakes, or a rainwater recovery system;
- ECO residential loans – a loan offer with a reduced margin where the customer, within the financed property, invests in energy-efficient installations, e.g. solar collectors, photovoltaic panels/cells including energy storage, heat pumps or central heating boilers using geothermal heating.

From 1 November 2024, we implemented a new process enabling the assessment of energy performance criteria already at the stage when the customer applies for a mortgage loan. If the customer meets the EP indicator criteria required by the Bank, the customer also benefits from a lower margin. The Bank aggregates data on the Energy Performance Certificates provided for statistical purposes.

13.2.2 Metrics and targets

Targets related to climate change mitigation and adaptation [E1-4]

Monitoring of outcomes of actions resulting from the climate policy

As mentioned in section **[E1-2]**, the Strategy sets out our directions and ambitions in the sustainable development area, particularly in the areas of climate change adaptation and mitigation. The results of progress toward the targets and ambitions set under *the Strategy* are subject to quarterly internal oversight and annual disclosures to external stakeholders. The targets indicated in *the Strategy* do not fully align with the formal requirements of ESRS E1.

The Strategy does not include specific short- and medium-term climate targets for the Pekao Group's loan and investment portfolio or own operations. These targets are instead included in the Transition Plan, which provides the methodological and time framework for the decarbonisation process. The Plan, adopted by the Management Board on 9 December 2025 and introduces the relevant targets and associated metrics as described in section **[E1-1]**.

For Strategy targets with quantitative thresholds, we assigned metrics to assess the degree of implementation of the actions undertaken (detailed description in the table below *"Summary of environmental targets in the Bank's Strategy for 2025–2027 and the Pekao Group's Transition Plan"*). The business targets indicated in *the Strategy* relate to financial amounts rather than carbon dioxide equivalents. This follows from the fact that they are not directly targeted at reducing financed emissions. The targets and metrics reported below were designed to transparently communicate our business objectives and were not adapted to the requirements of the European Sustainability Reporting Standards. Nevertheless, where this was possible, we made direct reference to the relevant ESRS E1-4 requirements in respect of reporting on the metrics of the actions undertaken by us.

The assumptions and methodology for the loan and investment portfolio target were developed based on a critical analysis of peer-group actions. The outputs of this work were not assessed or validated by an external body. The definitions underlying the determination of the strategic target in relation to the loan and investment portfolio were developed on the basis of expert knowledge, best market practices and evidence-based substantive standards, and were collected in the above-mentioned *Sustainable Finance Framework* document, which takes into account, inter alia, the EU Taxonomy guidelines (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 EU Green Bond Standard (EU GBS) under Regulation 2023/2631, and the Climate Bonds Initiative.

The quantitative target for financing the economy in the area of climate change mitigation and adaptation is also associated with a directional, qualitative business ambition introduced in *the Strategy*, consisting in developing products and models of cooperation with customers so as to support their sustainable business transformation.

The quantitative target for financing within the loan and investment portfolio set for 2025–2027 was achieved at the level of PLN 8.492 billion, i.e. 94% of the published strategic cumulative target of PLN 9 billion to be achieved by 2027.

The Strategy does not introduce interim targets or milestones, either in relation to the targets associated with reducing greenhouse gases from our own operations or for actions relating to the loan and investment portfolio. We have not changed the performance metric for the achievement of the business target since the announcement of the current *Strategy*.

The table below provides a concise summary of both the targets set out in *the Strategy* and the targets for the loan and investment portfolio and own operations set out under *the Transition Plan* and discussed in more detail in section **[E1-1]**.

Summary of environmental targets in the *Bank's Strategy for 2025–2027* and the Pekao Group's *Transition Plan*:

TARGETS ARISING FROM THE BANK'S STRATEGY FOR 2025–2027				
TARGET	**DESCRIPTION OF METRIC**	**2027 ADOPTED TARGET**	**2024 LEVEL**	**2025**
2027	Amount of new financing for green projects expressed in PLN	PLN 9 billion	N/A	PLN 8.492 billion
TARGETS ARISING FROM THE GROUP CAPITAL TRANSITION PLAN				
TARGET	**DESCRIPTION OF METRIC**	**2030 ADOPTED TARGET**	**2024 LEVEL**	**2025**
Reduction target for the corporate portfolio financing energy production	Intensity of financed CO_2e emissions (Scope 3, Category 15) in [t CO_2eq / MWh]	Target in 2030: -39.5% vs base year	N/A	0.322*
Reduction target for the portfolio financing retail real estate	Intensity of financed CO_2e emissions (Scope 3, Category 15) in [kg CO_2eq / m^2]	Target in 2030: -43.4% vs base year	N/A	58.8*
Reduction target for own operations (Scope 1 and 2) – market-based	t CO_2eq emissions in absolute terms	Target in 2030: -61% vs base year	32,154**	26,818***
Reduction target for own operations (Scope 1 and 2) – location-based	t CO_2eq emissions in absolute terms	Target in 2030: -60% vs base year	48,129**	42,287***

* base indicator for 2025 from the Transition Plan

** base value for 2024 from the Transition Plan

*** value achieved in 2025

New financing classified as green for the purposes of achieving the Strategy target includes financing under new agreements labelled as green in accordance with the internal definition and disbursed from 2025 and increases in financing[28] of existing agreements labelled as green.

Disclosure requirement [E1-5] – Energy consumption and energy mix

Under requirement E1-5, we report information on the Bank's total energy consumption in absolute terms, indicating areas for improving our energy efficiency, the level of exposure to coal-, oil- and gas-related activities, and the share of renewable energy in our overall energy mix.

When preparing energy data in line with regulatory requirements, we include only consumption resulting from processes conducted or managed by the Pekao Group. In the calculations presented below, we applied the same control boundary as we use for the calculation of greenhouse gas emissions within the Pekao Group. Our statement excludes raw materials and fuels that are not combusted for energy production – given the nature of our activity as a financial institution, we do not carry out such operations. We also do not use fuel as a raw material.

Quantitative energy data presented in the table *"Electricity consumption and energy mix"* below are expressed in megawatt-hours. Where the primary information was expressed in a different unit, we converted it into megawatt-hours using the relevant conversion factors. The data presented relate in each case to energy understood as final consumption (energy actually

[28] Increase understood as the difference between the current agreement amount and the previous one.

consumed by the Pekao Group). We produce renewable energy for our own needs and, in order to avoid double counting, we report this energy only within fuel consumption; we do not apply methods to offset energy consumption, and the energy produced by us is not sold to third parties. We also do not include energy obtained within the Pekao Group in the category “energy purchased or acquired”.

Given the nature of the activities conducted within the Pekao Group, we do not account for steam, heat or cooling (understood as “waste energy”) from third-party industrial processes; similarly, we do not account for renewable or non-renewable hydrogen. For the purposes of calculating Scope 2 greenhouse gas emissions, we classified electricity, steam, heat or cooling as renewable and non-renewable sources based on a prudent approach. In other words, we classified energy as renewable only when its origin was explicitly confirmed in our contractual arrangements with suppliers (details of the one-year contract and guarantees of origin are described in section [E1-6]).

Electricity consumption and energy mix

ENERGY CONSUMPTION AND ENERGY MIX	2024 BEFORE ADJUSTMENT	2024 AFTER ADJUSTMENT	2025
1) Total energy consumption from fossil sources (MWh)	69 165,09	69 292,07	60 515,40
Share of fossil sources in total energy consumption (%)	71%	71%	68%
2) Energy consumption from nuclear sources (MWh)	0	0	0
Share of energy consumption from nuclear sources in total energy consumption (%)	0%	0%	0%
3) Fuel consumption for renewable sources, including biomass (also covering industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh)	0	0	0
4) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	28 352,02	28 352,02	28 242,54
5) Consumption of renewable energy self-generated without fuel (MWh)	53,70	53,70	46,91
6) Total renewable and low-emission energy consumption (MWh) [calculated as the sum of rows 3-5]	28 405,72	28 405,72	28 289,45
Share of renewable sources in total energy consumption (%)	29%	29%	32%
Total energy consumption (MWh) [calculated as the sum of rows 1, 2, 6]	97 570,82	97 697,80	88 804,85

* Due to the development of the carbon footprint calculation methodology and the adjustment of the approach to presenting energy consumption from renewable sources, the results for 2024 have been recalculated.

We do not conduct activities in a sector with a significant climate impact; therefore, we do not present the structure of energy consumption by type of fossil fuel.

As the Pekao Group, we do not operate in sectors with a significant climate impact; therefore, we do not present in this report information related to energy intensity calculated based on net revenues.

Gross Scope 1, 2 and 3 greenhouse gas emissions and total greenhouse gas emissions [E1-6]

When calculating greenhouse gas emissions in Scopes 1 and 2, we apply the GHG Protocol Corporate Standard methodology E1-6-48b]. Given the nature of our business, we are not subject to the EU Emissions Trading System. The scope of the calculation covers data for the Pekao Group. We based the calculations on internally collected data on resource consumption (e.g. electricity, petrol, mileage) and on information published by the National Centre for Emissions Management (KOBIZE), the Energy Regulatory Office (URE), the UK Department for Environment, Food and Rural Affairs (DEFRA), as well as information provided by electricity suppliers. We do not identify biogenic emissions in Scopes 1 and 2. In 2025, we did not compile a breakdown enabling identification of the share of primary data in the carbon footprint calculation process for own operations. Greenhouse gas emissions are expressed in tonnes of carbon dioxide equivalent. We did not use external calculation tools for the calculations.

In the Scope 3 greenhouse gas inventory prepared in accordance with the GHG Protocol Corporate Accounting and Reporting Standard guidelines, we report the following categories in 2025: 1, 2, 6, 7 and 15. The 2025 estimation performed to determine the materiality of emissions from these categories showed that only Categories 1 (purchased goods), 2 (capital goods) and 7 (employees commuting) exceeded the adopted materiality threshold of 0.05% of the share in emissions calculated for Scope 3. In addition, due to observed market practice, we decided to include Category 6 (business travel) in the catalogue of reported material Scope 3 emission categories, even though the share of these emissions in total Scope 3 emissions did not exceed the defined threshold. We excluded the remaining Scope 3 categories in 2025 due to their marginal share or lack of business materiality.

In the current reporting year, we do not identify biogenic emissions from the combustion or biodegradation of biomass in any emissions category in our value chain.

We express the calculated greenhouse gas emissions in tonnes of carbon dioxide equivalent. The scope of the calculation for Categories 1, 2, 6 and 7, and 15 covered, respectively, the processes and financial exposures of the Bank and all subsidiaries. Thus, we covered all entities under the Pekao Group's operational control. We also included the finance lease portfolio in the calculation. We excluded value chain assets from the calculations, meaning assets and investments managed by the Pekao Group but not recognised on the Group's balance sheet, such as assets of investment funds managed by the Group.

With respect to Scope 3 Category 15, we identify three categories of financial assets (as presented in the consolidated financial statements) that were covered by the carbon footprint calculation: financial assets other than held for trading mandatorily measured at fair value through profit or loss, financial assets measured at fair value through other comprehensive income, and financial assets measured at amortised cost. We note that the data quality score used in the carbon footprint calculation is based on PCAF asset classes, not on the categories used in the financial statements.

- Corporate finance portfolio, including general-purpose exposures – 4.05
- Listed equity and corporate bond portfolio – 3.72
- Project finance portfolio – 4.39
- Mortgage-secured loan portfolio – commercial real estate – 2.09
- Mortgage-secured loan portfolio – retail real estate – 2.95
- Motor vehicle finance portfolio – 3.97

For the purposes of calculations relating to the sovereign bond portfolio, we used data from sources recommended by PCAF – the World Bank and a database maintained by the UN climate change body (United Nations Climate Change).

We covered 83.87% of the Pekao Group's balance sheet assets with carbon footprint calculations (in 2024, this figure was 77.82%).

We performed the calculations within the following asset classes, defined by the global greenhouse gas accounting and reporting standard for the financial industry developed by the Partnership for Carbon Accounting Financials (PCAF), of which we have been a member since July 2024. The calculation covered all asset classes defined by this standard that occur in the Pekao Group:

- corporate finance portfolio, including general-purpose exposures (business loans and unlisted equity) and purpose-specific loans (project finance),
- motor vehicle finance exposure portfolio (motor vehicle loans), which in the Pekao Group is understood as credit exposures and leasing exposures,
- mortgage-secured loan portfolio, including retail mortgages (mortgages) and commercial mortgages (commercial real estate),
- listed equity and corporate bond portfolio (listed equity and corporate bonds),
- sovereign debt finance portfolio (sovereign debt).

We carried out the calculations for individual asset classes in accordance with the global greenhouse gas accounting and reporting standard for the financial industry developed by PCAF.

We based the financial calculations of emissions related to the Pekao Group on data from internal and external sources. The scope of data obtained from external sources included, among others:

- data contained in the Central Register of Building Energy Performance Certificates maintained by the Minister of Development and Technology,

- average emissions factors contained in the European database of building emissions factors maintained by PCAF, used for the purposes of calculating financed emissions related to mortgage loans,
- reported emissions (emissions information collected directly from the borrower or the investee company),
- average emissions factors from the European building emissions database maintained by PCAF,
- financial data and data on corporate clients' reported emissions obtained from their non-financial reports and available databases.

The share of financed greenhouse gas emissions in the Pekao Group's portfolio calculated based on primary data (energy performance certificates and information obtained from companies' reports) in 2025 was 22.3%[29] (in 2024, this figure was 40%).

Other Scope 3 categories identified as material:

With respect to Scope 3 Category 1, we included emissions associated with the production of goods (i.e. tangible products) or the provision of services (intangible products) that we purchased from our suppliers in the calculations. For the purposes of calculating greenhouse gas emissions, we applied an activity- and spend-based approach, using, where possible, quantitative emissions factors (referring to the number of units of purchased products) published by the manufacturers of those goods. We excluded from the calculation for this category items that were classified to Scopes 1 and 2 (including services and products relating to the purchase of electricity and heat energy, fuels for vehicles in our company fleet) as well as products delivered and services provided by companies within the Pekao Group.

With respect to Scope 3 Category 2, the calculations covered emissions associated with the production of capital goods purchased by us (excluding emissions arising from the use of capital goods, which we classify to Scope 1 or 2 depending on the type of those goods). Analogously to Scope 3 Category 1, we also used an activity- and spend-based methodology.

With respect to Scope 3 Category 6, the calculations covered emissions associated with business travel in vehicles operated by third parties (i.e. air travel, rail, coach, passenger car). Emissions associated with transport in vehicles owned by, or under the control of, the Group were included in Scope 1 (fuel consumption) or Scope 2 (electricity consumption). For the calculations, we used DEFRA 2025 factors and Pekao Group internal data on business travel and the number of employees.

With respect to Scope 3 Category 7, the calculations covered emissions arising from employee transport between their place of residence and their workplace (i.e. travel by car, bus, rail, etc.). We calculated emissions based on the results of an internal survey conducted in 2025. On the basis of these data and information on the total number of employees in the Pekao Group, we calculated total emissions in this category.

The shares of greenhouse gas emissions in the Pekao Group's portfolio calculated on the basis of primary data for individual Scope 3 categories identified as material were, respectively:

- Category 1 – 2.72%
- Category 2 – 0.02%
- Category 6 – 95.76%
- Category 7 – 18.78%
- Category 15 – 22.3%

[29] The calculations do not include the motor vehicles financing portfolio (data not available).

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

	PEKAO GROUP							
	HISTORICAL DATA**				INTERIM TARGETS AND TARGET YEARS*			
	2024 BEFORE ADJUSTMENT	2024 AFTER ADJUSTMENT***	2025	% 2025/2024	2025	2030	2050	ANNUAL TARGET IN %/ 2024
SCOPE 1 GREENHOUSE GAS EMISSIONS								
Gross Scope 1 greenhouse gas emissions in metric tonnes of CO2 equivalent	8 704	8 650	8 349	97%	7 807	6 291	N/A	90%
Share of Scope 1 greenhouse gas emissions from regulated emission trading systems (%)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SCOPE 2 GREENHOUSE GAS EMISSIONS								
Gross Scope 2 greenhouse gas emissions in metric tonnes of CO_2 equivalent (location based)	24 498	39 865	33 991	85%	34 886	12 774	N/A	88%
Gross Scope 2 greenhouse gas emissions in metric tonnes of CO_2 equivalent (market based)	24 604	23 916	18 523	77%	20 498	6 321	N/A	86%
SIGNIFICANT SCOPE 3 GREENHOUSE GAS EMISSIONS								
Total indirect gross greenhouse gas emissions (Scope 3) in metric tonnes of CO_2 equivalent	14 657 189	14 657 189	12 357 144	84%	N/A	N/A	N/A	N/A
1) Purchased goods and services	N/A	N/A	28 793	N/A	N/A	N/A	N/A	N/A
2) Capital goods	N/A	N/A	168 567	N/A	N/A	N/A	N/A	N/A
6) Business travel	N/A	N/A	332	N/A	N/A	N/A	N/A	N/A
7) Employees' commuting	N/A	N/A	9 030	N/A	N/A	N/A	N/A	N/A
15) Investments	14 657 189	14 657 189	12 150 422	83%	N/A	N/A	N/A	N/A
TOTAL GREENHOUSE GAS EMISSIONS								
Total emissions in metric tonnes of CO_2 equivalent (location-based)	32 382	14 705 704	12 399 484	84%	N/A	N/A	N/A	N/A
Total emissions in metric tonnes of CO_2 equivalent (market-based)	32 513	14 689 755	12 384 016	84%	N/A	N/A	N/A	N/A

* Targets do not include CO_2e emissions from topping up refrigerants in installations not under the control of the Pekao Group.

** In connection with the approval of the *Transition Plan of the Bank Pekao S.A. Capital Group* by the Bank's Management Board in 2025, a change was introduced whereby the base year in this report is 2024, replacing the previously used base year 2022.

*** Due to the development of the carbon-footprint calculation methodology and the adjustment of the approach to presenting energy consumption from renewable sources, the results for 2024 have been recalculated. The recalculated data serve simultaneously as both the base year and comparative information.

Greenhouse gas emissions by Scopes 1, 2 and 3 in the Bank and subsidiaries

	BANK								COMPANIES TOTAL							
	HISTORICAL DATA*				INTERIM TARGETS AND TARGET YEARS				HISTORICAL DATA*				INTERIM TARGETS AND TARGET YEARS			
	2024 BEFORE ADJUSTMENT	2024 AFTER ADJUSTMENT**	2025	% 2025/2024	2025	2030	2050	ANNUAL TARGET IN %/ 2024	2024 BEFORE ADJUSTMENT	2024 AFTER ADJUSTMENT**	2025	% 2025/2024	2025	2030	2050	ANNUAL TARGET IN %/ 2024
SCOPE 1 GREENHOUSE GAS EMISSIONS																
Gross Scope 1 greenhouse gas emissions in metric tonnes of CO_2 equivalent	7 667	7 667	7 317	95%	N/A	N/A	N/A	N/A	1037	984	1 032	105%	N/A	N/A	N/A	N/A
Share of Scope 1 greenhouse gas emissions from regulated emission trading systems (%)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SCOPE 2 GREENHOUSE GAS EMISSIONS																
Gross Scope 2 greenhouse gas emissions in metric tonnes of CO_2 equivalent (location based)	23 306	38 522	33 173	86%	N/A	N/A	N/A	N/A	1 193	1 342	818	61%	N/A	N/A	N/A	N/A
Gross Scope 2 greenhouse gas emissions in metric tonnes of CO_2 equivalent (market based)	23 269	22 803	17 853	78%	N/A	N/A	N/A	N/A	1 335	1 113	669	60%	N/A	N/A	N/A	N/A
SIGNIFICANT SCOPE 3 GREENHOUSE GAS EMISSIONS																
Total indirect gross greenhouse gas emissions (Scope 3) in metric tonnes of CO_2 equivalent	11 809 197	11 809 197	9 239 390	78%	N/A	N/A	N/A	N/A	2 847 993	2 847 993	3 117 753	109%	N/A	N/A	N/A	N/A
1) Purchased goods and services	N/A	N/A	25065	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2728	N/A	N/A	N/A	N/A	N/A
2) Capital goods	N/A	N/A	12290	N/A	N/A	N/A	N/A	N/A	N/A	N/A	156278	N/A	N/A	N/A	N/A	N/A
6) Business travel	N/A	N/A	281	N/A	N/A	N/A	N/A	N/A	N/A	N/A	51	N/A	N/A	N/A	N/A	N/A
7) Employees' commuting	N/A	N/A	7961	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1069	N/A	N/A	N/A	N/A	N/A
15) Investments	11 809 197	11 809 197	9 192 974	78%	N/A	N/A	N/A	N/A	2 847 993	2 847 993	2 957 628	104%	N/A	N/A	N/A	N/A
TOTAL GREENHOUSE GAS EMISSIONS																
Total emissions in metric tonnes of CO_2 equivalent (location-based)	30 152	11 855 386	9 279 880	78%	N/A	N/A	N/A	N/A	2 230	2 850 319	3 119 603	109%	N/A	N/A	N/A	N/A
Total emissions in metric tonnes of CO_2 equivalent (market-based)	30 141	11 839 667	9 264 560	78%	N/A	N/A	N/A	N/A	2 372	2 850 090	3 119 454	109%	N/A	N/A	N/A	N/A

* In connection with the approval of the *Transition Plan of the Bank Pekao S.A. Capital Group* by the Bank's Management Board in 2025, a change was introduced whereby the base year in this report is 2024, replacing the previously used base year 2022.

** Due to the development of the carbon-footprint calculation methodology and the adjustment of the approach to presenting energy consumption from renewable sources, the results for 2024 have been recalculated. The recalculated data serve simultaneously as both the base year and comparative information.

Greenhouse gas emissions intensity ratio to revenue*:

GREENHOUSE GAS EMISSIONS INTENSITY RATIO TO REVENUE	2024	2025
Total greenhouse gas emissions (location-based method) per net revenue (t CO_2 equivalent/ thousand PLN)	0.65	0.53
Total greenhouse gas emissions (market-based method) per net revenue (t CO_2 equivalent/thousand PLN)	0.65	0.53

*Net revenue is defined by us as revenue from: interest, fees and commissions, and dividends (values are consistent with the Bank's Financial Statements for 2025).

Greenhouse gas removals and greenhouse gas emission reduction projects funded through carbon credits [E1-7]

The purpose of the disclosure on greenhouse gas removal and greenhouse gas emission reduction projects funded through carbon credits is to provide insight into the undertaking's actions aimed at permanently removing, or actively supporting the removal of, greenhouse gases from the atmosphere, potentially contributing to future net-zero targets. The scope of these disclosures is not relevant to our business, as neither the Bank nor the Pekao Group carries out such projects within its own operations. Even if the Bank holds an equity stake in such projects within its value chain, it does not meet the criteria for actively supporting these actions due to the lack of control over them.

Internal carbon pricing [E1-8]

This disclosure concerns whether the Pekao Group uses internal carbon pricing systems and, if so, how they support decision-making and incentivise the implementation of climate-related policies and targets. As neither the Pekao Group nor the Bank engages in carbon emissions trading, the scope of this disclosure is not applicable to our business.

Anticipated financial effects from material physical risks and transition risks and potential climate-related opportunities [E1-9]

In accordance with the delegated regulation adopted by the European Commission on 11 July 2025, which amends Appendix C to Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, so-called "first wave" undertakings – those reporting under ESRS in 2025 for the 2024 financial year – may omit the information set out in E1-9 in reports for 2025 and 2026. We have applied this option in the present report.

13.2.3 EU Taxonomy

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 – the so-called Taxonomy Regulation (hereinafter: the "Taxonomy" or the "EU Taxonomy", "classification system") – was developed by the European Commission as part of the European Green Deal and constitutes an important tool that enables the classification and definition of environmentally sustainable investments, thereby supporting the achievement of the European Union's climate and energy targets set for 2030.

Under the Taxonomy, environmentally sustainable investments must:

- Make a substantial contribution to at least one of the six environmental objectives;
- Do not significantly harm (DNSH) any of the remaining environmental objectives;
- Comply with minimum safeguards.

The criteria for substantial contribution and DNSH have been defined for the following 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)s.

Disclosures of Key Performance Indicators

In accordance with EU Taxonomy and its implementing acts:

- Commission 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[30];
- Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives;
- 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;[31];
- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives;
- 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 the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

In its 2025 disclosures, the Pekao 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 targets and four environmental targets:

- CCM – climate change mitigation,
- CCA – climate change adaptation,
- WTR – water and marine resources,
- CE – circular economy,

[30] 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.

[31] 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.

- PPC – pollution prevention and control,
- BIO – biodiversity and ecosystems,

In its 2025 disclosures, the Pekao Group applied the approach referred to in Article 4 of Commission Delegated Regulation (EU) 2026/73 of 4 July 2025, which provides that, in respect of a financial year starting between 1 January and 31 December 2025, it is permissible to apply Delegated Regulations (EU) 2021/2178, (EU) 2021/2139 and (EU) 2023/2486 as in force on 31 December 2025 (the so-called transitional period). At the same time, in the European Commission's draft FAQ[32] dated 17 December 2025, in questions Nos. 1 and 3 the Commission clarifies the rules under which financial institutions may make use of the transitional period, including disclosure of Template 6 (KPI on fees and commissions income from services other than lending and asset management) and Template 7 (KPI on the Trading book). Accordingly, in the present disclosure the Bank refrained from publishing the above templates in line with the Commission's explanations set out in its response to FAQ question No. 3.

Green Asset Ratio

The Green Asset Ratio (GAR) represents the proportion of assets associated with Taxonomy-aligned economic activities in relation to total covered assets. In accordance with Delegated Regulation 2021/2178, the numerator of the Green Asset Ratio includes::

- Exposures in the form of loans/advances, debt instruments or equity instruments to financial undertakings subject to non-financial reporting obligations under the Corporate Sustainability Reporting Directive;
- Exposures in the form of loans/advances, debt instruments or equity instruments to non-financial undertakings subject to non-financial reporting obligations under the Corporate Sustainability Reporting Directive;
- Exposures to households, including:

– loans collateralised by residential immovable property;

– loans for building renovation;

– motor vehicle loans;

- local governments financing.

In accordance with Delegated Regulation 2021/2178, the following categories of assets are excluded from the numerator and included in the denominator of the Green Asset Ratio:

- Exposures to non-financial undertakings not subject to CSRD (including SMEs) – all entities to which the Group provides financing / whose instruments it holds, which are not subject to the CSRD and carry out non-financial activities;
- Exposures to non-financial undertakings not subject to the CSRD, outside the EU;
- The gross carrying amount of:

– derivatives;

– on demand interbank loans;

- Cash and cash-related assets;
- Other assets (goodwill, commodities, etc.).

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

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

Pursuant to Delegated Regulation 2021/2178, financial undertakings use the latest available data and KPIs of their counterparties to calculate their own KPIs. To comply this requirement, the Group, based on the 2024 non-financial reports of

[32] Draft Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation, as amended by the Omnibus Delegated Act, on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (fourth notice).

customers that are financial undertakings and non-financial undertakings, verified whether those counterparties had made changes to their calculations since the last reporting period and whether they had presented comparative data.

Given that the reformulated KPIs identified by us as the Pekao Group, originating from counterparty undertakings, do not have a material impact on the values of the KPIs published in the Taxonomy disclosure for 2024, we did not present reformulated data, and the value of assets for the purposes of calculating the Green Asset Ratio as at 31 December 2024 presented in Template 1 is identical to its value in the Taxonomy disclosure for 2024.

Key Performance Indicators for Off-Balance-sheet Exposures

Key performance indicators for off-balance-sheet items are supplementary indicators that show the extent to which the Pekao Group's off-balance-sheet items, such as:

- Financial guarantees securing loans and advances and debt securities to undertakings subject to the CSRD Directive,
- Assets under management (equity and debt instruments) of undertakings subject to the CSRD Directive.

Green Asset Ratio for Financial Guarantees represents the proportion of financial guarantees supporting loans and advances and debt securities financing Taxonomy-aligned economic activities, in relation to all financial guarantees supporting loans and advances and debt securities for undertakings.

Green Asset Ratio for Assets Under Management presents the proportion of assets under management (equity instruments, debt instruments) from undertakings financing Taxonomy-aligned economic activities, in relation to total assets under management (equity instruments, debt instruments and other assets).

Financing of entities subject to non-financial reporting obligations under Corporate Sustainability Reporting Directive

For the purposes of disclosures of key performance indicators, the Bank and its subsidiaries analysed their exposures to financial institutions and non-financial undertakings in order to identify customers subject to non-financial data reporting requirements under CSRD.

The identification of entities subject to CSRD is based on internal data resources, combined with information available on the BIK ESG Platform and the Instrat Foundation's CSRD companies list. For entities operating outside Poland, an expert review of the portfolio is performed.

At the same time, in light of the amendments introduced by the so-called Omnibus I package to the Accounting Directive (2013/34/EU), which narrow the scope of entities subject to mandatory sustainability reporting requirements, the Pekao Group has applied in its current reporting the definition of large undertakings that was in force prior to the entry into effect of Omnibus I. Under this definition, large undertakings are those which, as at the balance-sheet date, exceed at least two of the following three criteria: an average number of employees of 250; a balance-sheet total of EUR 25 million; net turnover of EUR 50 million in the financial year..

We also determined the gross carrying amount of exposures in the form of loans and advances, debt securities and equity instruments in the banking book separately for each identified entity as of 31 December 2025.

For general-purpose financing, the Group determined the gross carrying amount of Taxonomy-eligible and Taxonomy-aligned exposures for customers subject to CSRD based on the key performance indicators published by these customers in their Taxonomy disclosures for 2024. The Group did not assess exposures to undertakings which, individually, were not subject to CSRD but are subsidiaries of a parent undertaking subject to those provisions.

For exposures to a subsidiary of a parent undertaking subject to CSRD, but exempt from sustainability reporting at individual level, we applied the key performance indicator for that undertaking as disclosed by its parent undertaking.

Due to limited access to data and documents evidencing Taxonomy alignment, the Pekao Group did not assessed any financings with a specific use of proceeds as Taxonomy-aligned, disclosing them only 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.

Regarding the assessment of compliance with Minimum Safeguards, the Group based its assessment on information disclosed by customers in their Taxonomy disclosures.

The Group is working on implementing appropriate changes in credit processes so that, in subsequent reporting periods, the relevant data can be obtained to assess Taxonomy eligibility and alignment at the financing origination stage.

Household Financing

To calculate the Green Asset Ratio, the Group classified its portfolio of residential real estate loans (secured by residential real estate) granted to households as Taxonomy-eligible and assessed Taxonomy alignment by verifying compliance with the criteria set out in Section 7.7 (Acquisition and ownership of buildings) of the technical screening criteria for the climate change mitigation, as set out in Annex I to Delegated Regulation 2021/2139.

We carried out the Taxonomy alignment assessment in accordance with Section 1.2.1.3 of Annex V to Delegated Regulation 2021/2178, which relates to retail clients. The assessment covered verification of compliance with the substantial contribution criteria for climate change mitigation and the "do no significant harm" (DNSH) criteria; however, it did not cover – as set forth in the afore-mentioned sections – minimum safeguards.

The Group's disclosures relating to retail clients cover residential real estate loans (collateralised by residential real estate) and do not include exposures related to the purchase of products and services, such as electric vehicles or photovoltaic panels. Consequently, the Pekao Group has not collected documentation confirming that undertakings producing goods and providing services purchased by retail clients comply with the relevant technical screening criteria and minimum safeguards.

To assess compliance with the substantial contribution criteria for residential buildings constructed before 31 December 2020, the Group assessed whether the building serving as collateral belongs to the top 15% most energy-efficient buildings in the country or region in terms of primary energy demand (PED), i.e. whether, in line with communication of the Ministry of Development and Technology, the building has a primary energy demand lower than the values specified in Table 1[33] of that communication. As a source of information on the primary energy demand of buildings serving as collateral for mortgage loans, we used data from energy performance certificates and data contained in the Central Register of Building Energy Performance maintained by the Minister of Development and Technology.

To assess compliance with the substantial contribution criteria for buildings constructed after 31 December 2020, the Group assessed whether the building serving as collateral has a primary energy demand at least 10% lower than the threshold specified for nearly zero-energy buildings, i.e. the requirements laid down in the Regulation of the Minister of Infrastructure of 12 April 2002 on building technical requirements and their locations. The Regulation sets maximum levels of primary energy demand for nearly zero-energy buildings separately for multi-family and single-family buildings. Exposures for which the Group did not have energy demand data were disclosed as Taxonomy-eligible but not Taxonomy-aligned.

For properties that, as a result of the above assessment process, were classified as meeting the substantial contribution criteria, the Pekao Group analysed compliance with the DNSH criteria by analysing the exposure of the property to physical risks (including flood and landslide risks) and the materiality of that risk in accordance with internal methodology. In the assessment, we took into account, among other factors, the property address, year of construction, the floor of the unit and the building type. The Group considered buildings to meet the DNSH criteria where the analysis indicated no exposure to physical risks, or where exposure to physical risks was assessed as not high in accordance with the adopted methodology. As of 31 December 2025, we did not identify, in the Group's loan portfolio, financing granted to households for building renovation or the purchase of motor vehicles.

Local governments financing

To support key performance indicator disclosures, the Group conducted a review of its exposure to local governments, identifying financings with a defined use of proceeds 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.

For the assessment of the substantial contribution and DNSH criteria, we developed internal instructions for assessing compliance with the technical screening criteria for activities that most commonly constitute the subject of financing granted to local governments. Due to limited access to data and documents enabling confirmation of alignment with the EU Taxonomy, the Group did not classify these financings as Taxonomy-aligned , disclosing them only 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 2025, the Group did not identify any financing in its credit portfolio related to public housing projects for local government entities.

33 Reference to the Ministry of Development and Technology's announcement: Table 1 Energy demand values corresponding to the 15% most energy-efficient buildings.

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 largest share of the Group's Taxonomy-aligned assets consisted of exposures to households in the form of mortgage loans for housing purposes, representing 91.3% of the assets included in the numerator of the GAR turnover-based KPI and 82.2% of the GAR CapEx-based KPI. Exposures to non-financial undertakings related to general-purpose financing, accounted for 8.6% of the assets included in the numerator of the GAR turnover-based KPI and 17.7% of the GAR CapEx-based KPI.

Among non-financial undertakings subject to the CSRD Directive that are customers of the Bank and Group entities, the highest Taxonomy alignment indicators are reported by undertakings operating in sectors related to the generation, distribution and trading of electricity, as well as fuel production, transport and the manufacture of machinery for the extractive industry.

The sustainable activities reported by non-financial undertakings identified in the Group's portfolio primarily contributed to the CCM (Climate Change Mitigation) objective.

Compared with the information disclosed by the Group for 2024, the value of the Green Asset Ratio increased both in relation to turnover (an increase of 0.81 p.p. year-on-year) and in relation to capital expenditure (an increase of 0.53 p.p. year-on-year).

These changes are driven mainly by a significant increase in the value of environmentally sustainable (Taxonomy-aligned) exposures in the portfolio of mortgage loans for housing purposes granted to households, with a broadly comparable year-on-year value of total covered assets (included in the denominator of that ratio).

A material factor influencing the value of Taxonomy-aligned household exposures was the change in the distribution of primary energy demand of buildings in the country and, consequently, the change in the primary energy demand threshold corresponding to the 15% most energy-efficient buildings. This threshold, set out in the communication of the Ministry of Development and Technology, increased in 2025 compared with the previous year.

With respect to general-purpose financing for non-financial corporations, the gross carrying amount of Taxonomy-aligned exposures decreased compared with the previous reporting period due to changes in the portfolio structure and client base. The Group did not introduce any changes to the methodology applied for assessing Taxonomy alignment, nor to the data sources used, which—similarly to the previous year—were the Taxonomy disclosures of the Group's clients.

Compliance with Regulation (EU) 2020/852 in Business Strategy, Product Design, and Collaboration with Customers and Counterparties. Additional or Supplementary Information Regarding the Bank's Strategy and the Significance of Financing Taxonomy-Aligned Business Activities Within the Overall Business Operations.

In 2025, the Bank presented its business strategy for 2025–2027, of which ESG forms an integral part. Environmental, social and governance (ESG) aspects remain an important pillar of the Bank's strategy. In line with the targets set, the Bank will focus on supporting clients in their transformation and in meeting environmental, social and governance requirements – at a pace that reflects their actual operational, financial and sector-specific capabilities.

In the environmental area, the Bank supports the objectives of the energy and climate transition, while aligning the pace and scale of actions with market conditions.

Our ambition is to provide new financing for green projects in the amount of PLN 9 billion. We define green projects as financing for: renewable energy sources, low-emission transport, energy-efficient construction, energy efficiency, the circular economy, biodiversity, prevention pollution, and the protection of water resources. These activities contribute to achieving all six environmental objectives covered by the EU Taxonomy, i.e.: climate change mitigation, climate change adaptation, water and marine resources, pollution prevention and control, biodiversity and ecosystems.

In addition, Bank Pekao adopted the "Transition Plan of the Bank Pekao S.A. Capital Group", covering targets and actions related to the Bank's own activities as well as financed emissions in the loan and investment portfolio of the Bank's capital group. The Transition Plan supports the implementation of the Bank's strategic objectives for 2025–2027 in the area of sustainable development, primarily the ambition to achieve climate neutrality of the Capital Group by 2050. The implementation of the Transition Plan's assumptions will also be supported by the development of a model for cooperation with clients that facilitates their transformation towards sustainable activities.

Compliance with the Taxonomy's technical screening criteria is one of the assumptions underpinning the main decarbonisation levers on the Bank's side, as set out in the Transition Plan for residential real estate loans. For both the primary and secondary markets, a gradual increase in mortgage loans aligned with the Taxonomy's technical screening criteria is assumed. The share of exposures contributing to the achievement of the Transition Plan's targets for mortgage loans will be monitored and reported to the Bank's Management Board and to the ESG Council.

At the same time, we continue to work on developing a product offering that supports the sustainable development of our clients and is tailored to the expectations of individual business segments. These efforts are complemented by educational and informational initiatives on climate and the environment, discussed in more detail in chapter [E1-3].

Disclosures based on the counterparty key performance indicator in relation to turnover (KPI Turnover)

Template 0: Summary of KPIsto be disclosed by credit institutions under Article 8 Taxonomy Regulation [PLN million] as at 31.12.2025

		Total environmentally sustainable assets[34]	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	4,373	1.72%	1.91%	70.98%	42.24%	29.02%
		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	Green Asset Ratio (flow)	1072	1.15%	1.33%	79.22%	55.78%	20.78%
	Financial Guarantees	82	0.23%	0.59%			
	Assets under management	379	5.92%	10.08%			

[34] Environmentally sustainable assets in relation to KPI Turnover.

Template 0: Summary of KPIsto be disclosed by credit institutions under Article 8 Taxonomy Regulation [PLN million] as at 31.12.2024

		Total environmentally sustainable assets[35]	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 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	Green Asset Ratio (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%			

[35] Environmentally sustainable assets in relation to KPI Turnover.

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 1 [PLN million]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	PLN million	31.12.2025													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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	103,113	68,823	4,365	1	1	245	282	1	0	1	0	0	0	0
2	**Financial Undertakings**	1,075	104	6	1	1	1	1	0	0	0	0	0	0	0
3	Credit Institutions	1,074	104	6	1	1	1	1	0	0	0	0	0	0	0
4	Loans and Advances	858	99	6	1	1	1	1	0	0	0	0	0	0	0
5	Debt securities, including UoP	216	5	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
7	Other financial corporations	1	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
12	of which asset 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
16	Of which insurance undertakings	1	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and Advances	1	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
20	**Non-Financial Undertakings**	8,382	914	366	0	0	244	281	1	0	1	0	0	0	0
21	Loans and Advances	6,391	752	250	0	0	151	267	0	0	0	0	0	0	0
22	Debt securities, including UoP	1,969	148	106	0	0	88	14	0	0	0	0	0	0	0
23	Equity Instruments	23	14	9		0	5	0	0		0	0	0		0

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	PLN million	31.12.2025													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	92,070	66,916	3,993	0	0	0	0	0	0	0				
25	Of which loans collateralised by residential immovable property	66,919	66,916	3,993	0	0	0	0	0	0	0				
26	Of which building renovation loansOf 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								
28	**Local governments financing**	1,585	888	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	1,585	888	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)**	151,546													
33	**Non-Financial Undertakings**	100,056													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	98,696													
35	Loans and Advances	89,713													
36	Of which loans collateralised by commercial immovable property	28,075													
37	Of which building renovation loans	0													
38	Debt Securities	8,215													
39	Equity Instruments	768													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,360													
41	Loans and Advances	1,040													
42	Debt Securities	51													
43	Equity Instruments	269													
44	**Derivatives**	1,233													
45	**On demand interbank loans**	403													
46	**Cash and Cash-Related Assets**	4,581													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	45,274													
48	**Total GAR assets**	254,659	68,823	4,365	1	1	245	282	1	0	1	0	0	0	0

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
PLN million		31.12.2025													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
49	**Assets not covered for GAR calculation**	104,110													
50	**Central Governments and Supranational Issuers**	78,222													
51	**Central banks exposure**	18,432													
52	**Trading book**	7,455													
53	**Total Assets**	358,769	68,823	4,365	1	1	245	282	1	0	1	0	0	0	0
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations															
54	Financial Guarantees	35,402	83	82	0	0	72	0	0	0	0	0	0	0	0
55	Assets under management	6,399	1,484	372	0	59	225	667	7	0	0	0	0	0	0
56	Of which Debt Securities	3,807	1,051	277	0	59	156	430	0	0	0	0	0	0	0
57	Of which Equity Instruments	2,591	433	95	0	0	69	238	6	0	0	0	0	0	0

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 2 [PLN million]

		a	o	p	q	r	s	t	u	v
PLN million		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use 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	103,113	24	8	0	0	0	0	0	0
2	**Financial Undertakings**	1,075	0	0	0	0	0	0	0	0
3	Credit Institutions	1,074	0	0	0	0	0	0	0	0
4	Loans and Advances	858	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	216	0	0	0	0	0	0	0	0
6	Equity Instruments	0	0	0		0	0	0		0
7	Other financial corporations	1	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
12	of which asset 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
16	Of which insurance undertakings	1	0	0	0	0	0	0	0	0
17	Loans and Advances	1	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
20	**Non-Financial Undertakings**	8,382	24	8	0	0	0	0	0	0
21	Loans and Advances	6,391	20	8	0	0	0	0	0	0
22	Debt securities, including UoP	1,969	4	0	0	0	0	0	0	0
23	Equity Instruments	23	0	0		0	0	0		0

		a	o	p	q	r	s	t	u	v
	PLN million	31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	92,070	0	0	0	0				
25	Of which loans collateralised by residential immovable property	66,919	0	0	0	0				
26	Of which building renovation loansOf which building renovation loans	0	0	0	0	0				
27	Of which motor vehicle loans	0								
28	**Local governments financing**	1,585	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	1,585	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
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	151,546								
33	**Non-Financial Undertakings**	100,056								
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	98,696								
35	Loans and Advances	89,713								
36	Of which loans collateralised by commercial immovable property	28,075								
37	Of which building renovation loans	0								
38	Debt Securities	8,215								
39	Equity Instruments	768								
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,360								
41	Loans and Advances	1,040								
42	Debt Securities	51								
43	Equity Instruments	269								
44	**Derivatives**	1,233								
45	**On demand interbank loans**	403								
46	**Cash and Cash-Related Assets**	4,581								
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	45,274								
48	**Total GAR assets**	254,659	24	8	0	0	0	0	0	0

		a	o	p	q	r	s	t	u	v
PLN million		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
49	**Assets not covered for GAR calculation**	104,110								
50	**Central Governments and Supranational Issuers**	78,222								
51	**Central banks exposure**	18,432								
52	**Trading book**	7,455								
53	**Total Assets**	358,769	0	0	0	0	0	0	0	0
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations										
54	Financial Guarantees	35,402	0	0	0	0	0	0	0	0
55	Assets under management	6,399	0	0	0	8	0	0	0	0
56	Of which Debt Securities	3,807	0	0	0	0	0	0	0	0
57	Of which Equity Instruments	2,591	0	0	0	8	0	0	0	0

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 3 [PLN million]

		a	w	x	z	aa	ab	ac	ad	ae	af
PLN million		31.12.2025									
		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 Proceeds	Of which enabling			Of which Use 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	103,113	1	0	0	0	69,130	4,373	1	1	246
2	**Financial Undertakings**	1,075	0	0	0	0	106	6	1	1	1
3	Credit Institutions	1,074	0	0	0	0	106	6	1	1	1
4	Loans and Advances	858	0	0	0	0	100	6	1	1	1
5	Debt securities, including UoP	216	0	0	0	0	5	0	0	0	0
6	Equity Instruments	0	0	0		0	0	0		0	0
7	Other financial corporations	1	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	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
11	Equity Instruments	0	0	0		0	0	0		0	0
12	of which asset 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	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
15	Equity Instruments	0	0	0		0	0	0		0	0
16	Of which insurance undertakings	1	0	0	0	0	0	0	0	0	0
17	Loans and Advances	1	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
19	Equity Instruments	0	0	0		0	0	0		0	0
20	**Non-Financial Undertakings**	8,382	1	0	0	0	1,220	374	0	0	245
21	Loans and Advances	6,391	0	0	0	0	1,040	259	0	0	151
22	Debt securities, including UoP	1,969	0	0	0	0	166	107	0	0	88
23	Equity Instruments	23	0	0		0	14	9		0	5

		a	w	x	z	aa	ab	ac	ad	ae	af
PLN million		31.12.2025									
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
24	**Households**	92,070					66,916	3,993	0	0	0
25	Of which loans collateralised by residential immovable property	66,919					66,916	3,993	0	0	0
26	Of which building renovation loans	0					0	0	0	0	0
27	Of which motor vehicle loans	0					0	0	0	0	0
28	**Local governments financing**	1,585	0	0	0	0	888	0	0	0	0
29	Housing Financing	0	0	0	0	0	0	0	0	0	0
30	Other Local Government Financing	1,585	0	0	0	0	888	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)**	151,546									
33	**Non-Financial Undertakings**	100,056									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	98,696									
35	Loans and Advances	89,713									
36	Of which loans collateralised by commercial immovable property	28,075									
37	Of which building renovation loans	0									
38	Debt Securities	8,215									
39	Equity Instruments	768									
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,360									
41	Loans and Advances	1,040									
42	Debt Securities	51									
43	Equity Instruments	269									
44	**Derivatives**	1,233									
45	**On demand interbank loans**	403									
46	**Cash and Cash-Related Assets**	4,581									
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	45,274									
48	**Total GAR assets**	254,659	1	0	0	0	69,130	4,373	1	1	246

		a	w	x	z	aa	ab	ac	ad	ae	af
PLN million		31.12.2025									
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
49	**Assets not covered for GAR calculation**	104,110									
50	**Central Governments and Supranational Issuers**	78,222									
51	**Central banks exposure**	18,432									
52	**Trading book**	7,455									
53	**Total Assets**	358,769	0	0	0	0	69,130	4,373	1	1	246
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations											
54	Financial Guarantees	35,402	0	0	0	0	83	82	0	0	72
55	Assets under management	6,399	0	0	0	2,199	379	0	59	226	2,471
56	Of which Debt Securities	3,807	0	0	0	1,482	278	0	59	156	1,638
57	Of which Equity Instruments	2,591	0	0	0	717	101	0	0	70	833

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 1 [PLN million]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	PLN million	31.12.2024													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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
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
12	of which asset 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
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
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	3	0	0		0	0	0		0

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	PLN million	31.12.2024													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	88,912	61,233	1,528	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
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

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
PLN million		31.12.2024													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
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 the calculation of GAR as at 31 December 2025 – Part 2 [PLN million]

		a	o	p	q	r	s	t	u	v
PLN million		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 Proceeds	Of which enabling			Of which Use 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	15	0	0	0	0	0	0	0
2	**Financial Undertakings**	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 asset 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	**Non-Financial Undertakings**	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

		a	o	p	q	r	s	t	u	v
		31.12.2024								
	PLN million	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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	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	**Local governments financing**	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	**Collateral obtained by taking possession: residential and commercial immovable properties**	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	15	0	0	0	0	0	0	0

		a	o	p	q	r	s	t	u	v
PLN million		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
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	0	0	0	0
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations										
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 the calculation of GAR as at 31 December 2025 – Part 3 [PLN million]

		a	w	x	z	aa	ab	ac	ad	ae	af
		31.12.2024									
PLN million		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 Proceeds	Of which enabling			Of which Use 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	Debt securities, including UoP	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	Debt securities, including UoP	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 asset 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	Debt securities, including UoP	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	Debt securities, including UoP	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	Debt securities, including UoP	1,365	0	0	0	0	416	215	0	0	176
23	Equity Instruments	23	0	0	0	0	15	7	0	0	3

		a	w	x	z	aa	ab	ac	ad	ae	af
PLN million		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
24	**Households**	88,912					61,233	1,528	0	0	0
25	Of which loans collateralised by residential immovable property	61,236					61,233	1,528	0	0	0
26	Of which building renovation loans	0					0	0	0	0	0
27	Of which motor vehicle loans	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									
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

		a	w	x	z	aa	ab	ac	ad	ae	af
PLN million		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
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 2: GAR sector information as at 31 December 2025 – 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)				Climate Change Adaptation (CCA)				Water and Marine Resources (WMR)				Circular Economy (CE)			
		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD	
		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount	
		Mn PLN	Of which Environmentally Sustainable (CCM)	Mn PLN	Of which Environmentally Sustainable (CCM)	Mn PLN	Of which Environmentally Sustainable (CCA)	Mn PLN	Of which Environmentally Sustainable (CCA)	Mn PLN	Of which Environmentally Sustainable (WMR)	Mn PLN	Of which Environmentally Sustainable (WMR)	Mn PLN	Of which Environmentally Sustainable (CE)	Mn PLN	Of which Environmentally Sustainable (CE)
1	C20.15	464	4			464	0			464	0			464	0		
2	C22.22	11	0			11	0			11	0			11	8		
3	C23.20	11	0			11	0			11	0			11	0		
4	C24.42	90	22			90	0			90	0			90	0		
5	C25.11	30	0			30	0			30	0			30	0		
6	C25.93	43	0			43	0			43	0			43	0		
7	C30.20	0	0			0	0			0	0			0	0		
8	F41.20	16	0			16	0			16	0			16	0		
9	F42.11	1	0			1	0			1	0			1	0		
10	F42.12	0	0			0	0			0	0			0	0		
11	J62.01	1	0			1	0			1	0			1	0		
12	C24.51	11	0			11	0			11	0			11	0		
13	D35.30	0	0			0	0			0	0			0	0		

Template 2: GAR sector information as at 31 December 2025 – Part 2 [Mn PLN]

		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 to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD	
		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount	
		Mn PLN	Of which Environmentally Sustainable (PPC)	Mn PLN	Of which Environmentally Sustainable (PPC)	Mn PLN	Of which Environmentally Sustainable (BIO)	Mn PLN	Of which Environmentally Sustainable (BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	C20.15	464	0			464	0			464	4		
2	C22.22	11	0			11	0			11	8		
3	C23.20	11	0			11	0			11	0		
4	C24.42	90	0			90	0			90	22		
5	C25.11	30	0			30	0			30	0		
6	C25.93	43	0			43	0			43	0		
7	C30.20	0	0			0	0			0	0		
8	F41.20	16	0			16	0			16	0		
9	F42.11	1	0			1	0			1	0		
10	F42.12	0	0			0	0			0	0		
11	J62.01	1	0			1	0			1	0		
12	C24.51	11	0			11	0			11	0		
13	D35.30	0	0			0	0			0	0		

Template 3: GAR KPI stock as at 31 December 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total covered assets in the denominator)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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	27.03%	1.71%	0.00%	0.00%	0.10%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	**Financial Undertakings**	0.04%	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	0.04%	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	0.04%	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	0.00%	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 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%
11	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
12	of which asset 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 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%
15	Equity Instruments	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 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%
19	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total covered assets in the denominator)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0.36%	0.14%	0.00%	0.00%	0.10%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.30%	0.10%	0.00%	0.00%	0.06%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.06%	0.04%	0.00%	0.00%	0.03%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity Instruments	0.01%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
24	**Households**	26.28%	1.57%	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	26.28%	1.57%	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**	0.35%	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	0.35%	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**	27.03%	1.71%	0.00%	0.00%	0.10%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 3: GAR KPI stock as at 31 December 2025 – Part 2 [%]

	% (compared to total covered assets in the denominator)	n	o	p	q	r	s	t	u
		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and Advances	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%
6	Equity Instruments	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%
8	Of which investment firms	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%
10	Debt securities, including UoP	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%
12	of which asset management companies	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%
14	Debt securities, including UoP	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%
16	Of which insurance undertakings	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%
18	Debt securities, including UoP	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%

		n	o	p	q	r	s	t	u
% (compared to total covered assets in the denominator)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	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%
24	**Households**	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	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%
27	Of which motor vehicle loans	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%
29	Housing Financing	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%
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%
32	**Total GAR assets**	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 3: GAR KPI stock as at 31 December 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to total covered assets in the denominator)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use 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%	27.15%	1.72%	0.00%	0.00%	0.10%	28.74%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.30%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.30%
4	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.24%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%
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 asset 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%

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to total covered assets in the denominator)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling	
20	**Non-Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.48%	0.15%	0.00%	0.00%	0.10%	2.34%
21	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.41%	0.10%	0.00%	0.00%	0.06%	1.78%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.07%	0.04%	0.00%	0.00%	0.03%	0.55%
23	Equity Instruments	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%	26.28%	1.57%	0.00%	0.00%	0.00%	25.66%
25	Of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%	26.28%	1.57%	0.00%	0.00%	0.00%	18.65%
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%	0.35%	0.00%	0.00%	0.00%	0.00%	0.44%
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%	0.35%	0.00%	0.00%	0.00%	0.00%	0.44%
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%	27.15%	1.72%	0.00%	0.00%	0.10%	70.98%

Template 3: GAR KPI stock as at 31 December 2024 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total covered assets in the denominator)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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	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	0,00%	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 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%
11	Equity Instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
12	of which asset 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 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%
15	Equity Instruments	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 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%
19	Equity Instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%

	% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m
		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**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%
21	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%
22	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%
23	Equity Instruments	0,01%	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%
25	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%
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**	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
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	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
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**	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%

Template 3: GAR KPI stock as at 31 December 2024 – Part 2 [%]

		n	o	p	q	r	s	t	u
% (compared to total covered assets in the denominator)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	**Financial Undertakings**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit Institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and Advances	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%
6	Equity Instruments	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%
8	Of which investment firms	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%
10	Debt securities, including UoP	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%
12	of which asset management companies	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%
14	Debt securities, including UoP	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%
16	Of which insurance undertakings	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%
18	Debt securities, including UoP	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%

	% (compared to total covered assets in the denominator)	n	o	p	q	r	s	t	u
		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and Advances	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including UoP	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%
24	**Households**	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	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%
27	Of which motor vehicle loans	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%
29	Housing Financing	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%
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%
32	**Total GAR assets**	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

Template 3: GAR KPI stock as at 31 December 2024 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to total covered assets in the denominator)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use 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%	27,01%	0,88%	0,00%	0,00%	0,18%	29,53%
2	**Financial Undertakings**	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%
3	Credit Institutions	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%
4	Loans and Advances	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%
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 asset 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%

	% (compared to total covered assets in the denominator)	v	w	x	z	aa	ab	ac	ad	ae	af
		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling	
20	**Non-Financial Undertakings**	0,00%	0,00%	0,00%	0,00%	0,65%	0,24%	0,00%	0,00%	0,18%	2,59%
21	Loans and Advances	0,00%	0,00%	0,00%	0,00%	0,47%	0,14%	0,00%	0,00%	0,10%	2,18%
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,18%	0,09%	0,00%	0,00%	0,07%	0,40%
23	Equity Instruments	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%	25,84%	0,64%	0,00%	0,00%	0,00%	26,12%
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%
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%	0,46%	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%
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%
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%	27,01%	0,88%	0,00%	0,00%	0,18%	69,62%

Template 4: GAR KPI flow for 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to flow of total eligible assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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	11.32%	1.14%	0.00%	0.00%	0.11%	0.00%	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%
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	0.06%	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	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
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	0.00%	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 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%
11	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
12	of which asset 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 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%
15	Equity Instruments	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 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%
19	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to flow of total eligible assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0.30%	0.14%	0.00%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.23%	0.11%	0.00%	0.00%	0.09%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.06%	0.02%	0.00%	0.00%	0.02%	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%
24	**Households**	9.99%	1.00%	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	9.85%	1.00%	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%
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**	0.95%	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	0.95%	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**	11.32%	1.14%	0.00%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 4: GAR KPI flow for 2025 – Part 2 [%]

		n	o	p	q	r	s	t	u
	% (compared to flow of total eligible assets)	31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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	0.02%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and Advances	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%
6	Equity Instruments	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%
8	Of which investment firms	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%
10	Debt securities, including UoP	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%
12	of which asset management companies	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%
14	Debt securities, including UoP	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%
16	Of which insurance undertakings	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%
18	Debt securities, including UoP	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%

		n	o	p	q	r	s	t	u
% (compared to flow of total eligible assets)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0.02%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.02%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	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%
24	**Households**	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	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%
27	Of which motor vehicle loans	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%
29	Housing Financing	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%
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%
32	**Total GAR assets**	0.02%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 4: GAR KPI flow for 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae	af
	% (compared to flow of total eligible assets)	31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use 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%	11.34%	1.15%	0.00%	0.00%	0.11%	23.44%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%	0.54%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%	0.54%
4	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%	0.36%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.18%
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 asset 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%

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to flow of total eligible assets)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling	
20	**Non-Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.33%	0.15%	0.00%	0.00%	0.11%	3.27%
21	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.25%	0.12%	0.00%	0.00%	0.09%	2.21%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.07%	0.02%	0.00%	0.00%	0.02%	1.04%
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%	9.99%	1.00%	0.00%	0.00%	0.00%	18.28%
25	Of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%	9.85%	1.00%	0.00%	0.00%	0.00%	7.81%
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%	0.95%	0.00%	0.00%	0.00%	0.00%	1.35%
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%	0.95%	0.00%	0.00%	0.00%	0.00%	1.35%
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%	11.34%	1.15%	0.00%	0.00%	0.11%	79.22%

Template 5: KPI off-balance-sheet exposures as at 31 December 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.24%	0.23%	0.00%	0.00%	0.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	23.20%	5.81%	0.00%	0.92%	3.52%	10.43%	0.11%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures as at 31 December 2025 – Part 2 [%]

		n	o	p	q	r	s	t	u
% (compared to total eligible off-balance sheet assets)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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%
2	Assets under management (AuM KPI)	0.60%	0.00%	0.00%	0.00%	0.12%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures as at 31 December 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.24%	0.23%	0.00%	0.00%	0.20%
2	Assets under management (AuM KPI)	0.01%	0.00%	0.00%	0.00%	34.37%	5.92%	0.00%	0.92%	3.53%

Template 5: KPI off-balance-sheet exposures in relation to flow for 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI))	17.67%	1.76%	0.00%	0.14%	1.09%	11.86%	4.55%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures in relation to flow for 2025 – Part 2 [%]

		n	o	p	q	r	s	t	u
% (compared to total eligible off-balance sheet assets)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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%
2	Assets under management (AuM KPI)	1.21%	0.00%	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures in relation to flow for 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	30.79%	6.32%	0.00%	0.14%	1.10%

Disclosures based on the counterparty key performance indicator in relation to turnover (KPI Capex)

Template 0: Summary of KPIsto be disclosed by credit institutions under Article 8 Taxonomy Regulation [Mn PLN] as at 31.12.2025

		Total environmentally sustainable assets[36]	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	4,858	1.72%	1.91%	70.98%	42.24%	29.02%
		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	Green Asset Ratio (flow)	1234	1.15%	1.33%	79.22%	55.78%	20.78%
	Financial Guarantees	210	0.23%	0.59%			
	Assets under management	645	5.92%	10.08%			

[36] Environmentally sustainable assets in relation to KPI Turnover.

Disclosures based on the counterparty key performance indicator in relation to turnover (KPI Capex)

Template 0: Summary of KPIsto be disclosed by credit institutions under Article 8 Taxonomy Regulation [Mn PLN] as at 31.12.2024

		Total environmentally sustainable assets[37]	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	Green Asset Ratio (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%			

[37] Environmentally sustainable assets in relation to KPI Turnover.

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 1 [Mn PLN]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	Mn PLN	31.12.2025													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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	103,113	70,594	4,850	1	16	445	270	8	0	0	3	0	0	0
2	**Financial Undertakings**	1,075	106	7	1	1	2	1	0	0	0	0	0	0	0
3	Credit Institutions	1,074	106	7	1	1	2	1	0	0	0	0	0	0	0
4	Loans and Advances	858	101	7	1	1	2	1	0	0	0	0	0	0	0
5	Debt securities, including UoP	216	5	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
7	Other financial corporations	1	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
12	of which asset 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
16	Of which insurance undertakings	1	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and Advances	1	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
20	**Non-Financial Undertakings**	8,382	2,684	850	0	15	443	269	8	0	0	3	0	0	0
21	Loans and Advances	6,391	2,030	410	0	13	127	259	2	0	0	2	0	0	0
22	Debt securities, including UoP	1,969	636	425	0	2	303	8	5	0	0	1	0	0	0
23	Equity Instruments	23	17	15		0	13	2	1		0	0	0		0

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
Mn PLN		31.12.2025													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	92,070	66,916	3,993	0	0	0	0	0	0	0				
25	Of which loans collateralised by residential immovable property	66,919	66,916	3,993	0	0	0	0	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								
28	**Local governments financing**	1,585	888	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	1,585	888	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)**	151,546													
33	**Non-Financial Undertakings**	100,056													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	98,696													
35	Loans and Advances	89,713													
36	Of which loans collateralised by commercial immovable property	28,075													
37	Of which building renovation loans	0													
38	Debt Securities	8,215													
39	Equity Instruments	768													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,360													
41	Loans and Advances	1,040													
42	Debt Securities	51													
43	Equity Instruments	269													
44	**Derivatives**	1,233													
45	**On demand interbank loans**	403													
46	**Cash and Cash-Related Assets**	4,581													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	45,274													
48	**Total GAR assets**	254,659	70,594	4,850	1	16	445	270	8	0	0	3	0	0	0

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		31.12.2025													
	Mn PLN	Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
49	**Assets not covered for GAR calculation**	104,110													
50	**Central Governments and Supranational Issuers**	78,222													
51	**Central banks exposure**	18,432													
52	**Trading book**	7,455													
53	**Total Assets**	358,769	70,594	4,850	1	16	445	270	8	0	0	3	0	0	0
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations															
54	Financial Guarantees	35,402	212	210	0	0	141	0	0	0	0	0	0	0	0
55	Assets under management	6,399	2,194	638	0	47	465	1,316	7	0	0	0	0	0	42
56	Of which Debt Securities	3,807	1,382	447	0	38	335	736	2	0	0	0	0	0	2
57	Of which Equity Instruments	2,591	812	191	0	10	130	580	5	0	0	0	0	0	41

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 2 [Mn PLN]

		a	o	p	q	r	s	t	u	v
Mn PLN		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use 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	103,113	56	1	0	0	1	0	0	0
2	**Financial Undertakings**	1,075	0	0	0	0	0	0	0	0
3	Credit Institutions	1,074	0	0	0	0	0	0	0	0
4	Loans and Advances	858	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	216	0	0	0	0	0	0	0	0
6	Equity Instruments	0	0	0		0	0	0		0
7	Other financial corporations	1	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
12	of which asset 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
16	Of which insurance undertakings	1	0	0	0	0	0	0	0	0
17	Loans and Advances	1	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
20	**Non-Financial Undertakings**	8,382	55	1	0	0	1	0	0	0
21	Loans and Advances	6,391	48	1	0	0	1	0	0	0
22	Debt securities, including UoP	1,969	7	0	0	0	0	0	0	0
23	Equity Instruments	23	0	0		0	0	0		0

		a	o	p	q	r	s	t	u	v
Mn PLN		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	92,070	0	0	0	0				
25	Of which loans collateralised by residential immovable property	66,919	0	0	0	0				
26	Of which building renovation loans	0	0	0	0	0				
27	Of which motor vehicle loans	0								
28	**Local governments financing**	1,585	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	1,585	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
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	151,546								
33	**Non-Financial Undertakings**	100,056								
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	98,696								
35	Loans and Advances	89,713								
36	Of which loans collateralised by commercial immovable property	28,075								
37	Of which building renovation loans	0								
38	Debt Securities	8,215								
39	Equity Instruments	768								
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,360								
41	Loans and Advances	1,040								
42	Debt Securities	51								
43	Equity Instruments	269								
44	**Derivatives**	1,233								
45	**On demand interbank loans**	403								
46	**Cash and Cash-Related Assets**	4,581								
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	45,274								
48	**Total GAR assets**	254,659	56	1	0	0	1	0	0	0

Mn PLN		a	o	p	q	r	s	t	u	v
		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
49	**Assets not covered for GAR calculation**	104,110								
50	**Central Governments and Supranational Issuers**	78,222								
51	**Central banks exposure**	18,432								
52	**Trading book**	7,455								
53	**Total Assets**	358,769	56	1	0	0	1	0	0	0
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations										
54	Financial Guarantees	35,402	0	0	0	0	0	0	0	0
55	Assets under management	6,399	1	0	0	2	0	0	0	0
56	Of which Debt Securities	3,807	0	0	0	0	0	0	0	0
57	Of which Equity Instruments	2,591	1	0	0	2	0	0	0	0

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 3 [Mn PLN]

		a	w	x	z	aa	ab	ac	ad	ae	af
Mn PLN		31.12.2025									
		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 Proceeds	Of which enabling			Of which Use 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	103,113	0	0	0	0	70,924	4,858	1	23	445
2	**Financial Undertakings**	1,075	0	0	0	0	108	7	1	1	2
3	Credit Institutions	1,074	0	0	0	0	108	7	1	1	2
4	Loans and Advances	858	0	0	0	0	103	7	1	1	2
5	Debt securities, including UoP	216	0	0	0	0	5	0	0	0	0
6	Equity Instruments	0	0	0		0	0	0		0	0
7	Other financial corporations	1	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	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
11	Equity Instruments	0	0	0		0	0	0		0	0
12	of which asset 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	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
15	Equity Instruments	0	0	0		0	0	0		0	0
16	Of which insurance undertakings	1	0	0	0	0	0	0	0	0	0
17	Loans and Advances	1	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
19	Equity Instruments	0	0	0		0	0	0		0	0
20	**Non-Financial Undertakings**	8,382	0	0	0	0	3,012	858	0	22	443
21	Loans and Advances	6,391	0	0	0	0	2,340	413	0	15	128
22	Debt securities, including UoP	1,969	0	0	0	0	652	430	0	6	303
23	Equity Instruments	23	0	0		0	19	15		1	13

		a	w	x	z	aa	ab	ac	ad	ae	af
Mn PLN		31.12.2025									
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
24	**Households**	92,070					66,916	3,993	0	0	0
25	Of which loans collateralised by residential immovable property	66,919					66,916	3,993	0	0	0
26	Of which building renovation loans	0					0	0	0	0	0
27	Of which motor vehicle loans	0					0	0	0	0	0
28	**Local governments financing**	1,585	0	0	0	0	888	0	0	0	0
29	Housing Financing	0	0	0	0	0	0	0	0	0	0
30	Other Local Government Financing	1,585	0	0	0	0	888	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)**	151,546									
33	**Non-Financial Undertakings**	100,056									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	98,696									
35	Loans and Advances	89,713									
36	Of which loans collateralised by commercial immovable property	28,075									
37	Of which building renovation loans	0									
38	Debt Securities	8,215									
39	Equity Instruments	768									
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,360									
41	Loans and Advances	1,040									
42	Debt Securities	51									
43	Equity Instruments	269									
44	**Derivatives**	1,233									
45	**On demand interbank loans**	403									
46	**Cash and Cash-Related Assets**	4,581									
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	45,274									
48	**Total GAR assets**	254,659	0	0	0	0	70,924	4,858	1	23	445

		a	w	x	z	aa	ab	ac	ad	ae	af
Mn PLN		31.12.2025									
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
49	**Assets not covered for GAR calculation**	104,110									
50	**Central Governments and Supranational Issuers**	78,222									
51	**Central banks exposure**	18,432									
52	**Trading book**	7,455									
53	**Total Assets**	358,769	0	0	0	0	70,924	4,858	1	23	445
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations											
54	Financial Guarantees	35,402	0	0	0	0	212	210	0	0	141
55	Assets under management	6,399	0	0	0	3,555	645	0	47	465	4,065
56	Of which Debt Securities	3,807	0	0	0	2,120	449	0	38	335	2,457
57	Of which Equity Instruments	2,591	0	0	0	1,435	197	0	10	130	1,608

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 1 [Mn PLN]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	Mn PLN	31.12.2024													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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
2	**Financial Undertakings**	1,111	157	8	0	4	2	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
4	Loans and Advances	1,110	157	8	0	4	2	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
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 asset 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	3,300	1,610	0	73	1,113	109	26	0	3	2	0	0	0
21	Loans and Advances	7,429	2,429	1,159	0	70	741	90	9	0	2	2	0	0	0
22	Debt securities, including UoP	1,365	861	442	0	3	367	17	16	0	2	0	0	0	0
23	Equity Instruments	23	10	9	0	0	5	2	1	0	0	0	0	0	0

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	Mn PLN	31.12.2024													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	88,912	61,233	1,528	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
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	65,778	3,147	0	76	1,116	109	26	0	4	2	0	0	0

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
	Mn PLN	31.12.2024													
		Total (gross) carrying amount	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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
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
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
55	Assets under management	4,060	1,529	582	0	97	377	807	66	0	3	3	0	0	0
56	Of which Debt Securities	1,424	999	397	0	64	276	452	1	0	0	3	0	0	0
57	Of which Equity Instruments	2,636	530	185	0	33	101	355	65	0	3	0	0	0	0

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 2 [Mn PLN]

		a	o	p	q	r	s	t	u	v
	Mn PLN	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 Proceeds	Of which enabling			Of which Use 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	18	0	0	0	1	0	0	0
2	**Financial Undertakings**	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 asset 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	**Non-Financial Undertakings**	8,817	18	0	0	0	1	0	0	0
21	Loans and Advances	7,429	17	0	0	0	1	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

	Mn PLN	a	o	p	q	r	s	t	u	v
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
24	**Households**	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	**Local governments financing**	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	**Collateral obtained by taking possession: residential and commercial immovable properties**	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	18	0	0	0	1	0	0	0

		a	o	p	q	r	s	t	u	v
		31.12.2024								
Mn PLN		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
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	18	0	0	0	1	0	0	0
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations										
54	Financial Guarantees	31,701	0	0	0	0	0	0	0	0
55	Assets under management	4,060	84	0	0	0	0	0	0	0
56	Of which Debt Securities	1,424	26	0	0	0	0	0	0	0
57	Of which Equity Instruments	2,636	58	0	0	0	0	0	0	0

Template 1: Assets for the calculation of GAR as at 31 December 2025 – Part 3 [Mn PLN]

		a	w	x	z	aa	ab	ac	ad	ae	af
	Mn 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 Proceeds	Of which enabling			Of which Use 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	65,907	3,173	0	76	1,120
2	**Financial Undertakings**	1,111	0	0	0	0	158	8	0	4	3
3	Credit Institutions	1,110	0	0	0	0	158	8	0	4	3
4	Loans and Advances	1,110	0	0	0	0	158	8	0	4	3
5	Debt securities, including UoP	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	Debt securities, including UoP	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 asset 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	Debt securities, including UoP	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	Debt securities, including UoP	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	3,430	1,636	0	73	1,117
21	Loans and Advances	7,429	0	0	0	0	2,539	1,168	0	70	743
22	Debt securities, including UoP	1,365	0	0	0	0	878	458	0	3	369
23	Equity Instruments	23	0	0	0	0	13	10	0	0	5

		a	w	x	z	aa	ab	ac	ad	ae	af
Mn 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
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									
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	65,907	3,173	0	76	1,120

		a	w	x	z	aa	ab	ac	ad	ae	af
Mn 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
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	1	0	0	0	65,907	3,173	0	76	1,120
Off-Balance Sheet Exposures – Undertakings subject to NFRD disclosure obligations											
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 2: GAR sector information as at 31 December 2025 – Part 1 [Mn PLN]

		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)				Climate Change Adaptation (CCA)				Water and Marine Resources (WMR)				Circular Economy (CE)			
		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD	
		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount	
		Mn PLN	Of which Environmentally Sustainable (CCM)	Mn PLN	Of which Environmentally Sustainable (CCM)	Mn PLN	Of which Environmentally Sustainable (CCA)	Mn PLN	Of which Environmentally Sustainable (CCA)	Mn PLN	Of which Environmentally Sustainable (WMR)	Mn PLN	Of which Environmentally Sustainable (WMR)	Mn PLN	Of which Environmentally Sustainable (CE)	Mn PLN	Of which Environmentally Sustainable (CE)
1	C20.15	464	8			464	0			464	0			464	1		
2	C22.22	11	0			11	0			11	0			11	0		
3	C23.20	11	0			11	0			11	0			11	0		
4	C24.42	90	20			90	0			90	0			90	0		
5	C25.11	30	0			30	0			30	0			30	0		
6	C25.93	43	0			43	0			43	0			43	0		
7	C30.20	0	0			0	0			0	0			0	0		
8	F41.20	16	0			16	0			16	0			16	0		
9	F42.11	1	0			1	0			1	0			1	0		
10	F42.12	0	0			0	0			0	0			0	0		
11	J62.01	1	0			1	0			1	0			1	0		
12	C24.51	11	0			11	0			11	0			11	0		
13	D35.30	0	0			0	0			0	0			0	0		

Template 2: GAR sector information as at 31 December 2025 – Part 2 [Mn PLN]

		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 to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and Other NFC not subject to NFRD	
		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount		[Gross] Carrying Amount	
		Mn PLN	Of which Environmentally Sustainable (PPC)	Mn PLN	Of which Environmentally Sustainable (PPC)	Mn PLN	Of which Environmentally Sustainable (BIO)	Mn PLN	Of which Environmentally Sustainable (BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	C20.15	464	0			464	0			464	8		
2	C22.22	11	0			11	0			11	0		
3	C23.20	11	0			11	0			11	0		
4	C24.42	90	0			90	0			90	20		
5	C25.11	30	0			30	0			30	0		
6	C25.93	43	0			43	0			43	0		
7	C30.20	0	0			0	0			0	0		
8	F41.20	16	0			16	0			16	0		
9	F42.11	1	0			1	0			1	0		
10	F42.12	0	0			0	0			0	0		
11	J62.01	1	0			1	0			1	0		
12	C24.51	11	0			11	0			11	0		
13	D35.30	0	0			0	0			0	0		

Template 3: GAR KPI stock as at 31 December 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total covered assets in the denominator)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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%
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	0,00%	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 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%
11	Equity Instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%
12	of which asset 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 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%
15	Equity Instruments	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 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%
19	Equity Instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total covered assets in the denominator)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
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%
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%
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%
23	Equity Instruments	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%
25	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%
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**	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
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	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
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**	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%

Template 3: GAR KPI stock as at 31 December 2025 – Part 2 [%]

		n	o	p	q	r	s	t	u
		31.12.2025							
% (compared to total covered assets in the denominator)		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	**Financial Undertakings**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit Institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and Advances	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%
6	Equity Instruments	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%
8	Of which investment firms	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%
10	Debt securities, including UoP	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%
12	of which asset management companies	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%
14	Debt securities, including UoP	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%
16	Of which insurance undertakings	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%
18	Debt securities, including UoP	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%

		n	o	p	q	r	s	t	u
% (compared to total covered assets in the denominator)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and Advances	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including UoP	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%
24	**Households**	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	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%
27	Of which motor vehicle loans	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%
29	Housing Financing	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%
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%
32	**Total GAR assets**	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

Template 3: GAR KPI stock as at 31 December 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to total covered assets in the denominator)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use 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%	27,81%	1,34%	0,00%	0,03%	0,47%	29,53%
2	**Financial Undertakings**	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%
3	Credit Institutions	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%
4	Loans and Advances	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%
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 asset 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%

	% (compared to total covered assets in the denominator)	v	w	x	z	aa	ab	ac	ad	ae	af
		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling	
20	**Non-Financial Undertakings**	0,00%	0,00%	0,00%	0,00%	1,45%	0,69%	0,00%	0,03%	0,47%	2,59%
21	Loans and Advances	0,00%	0,00%	0,00%	0,00%	1,07%	0,49%	0,00%	0,03%	0,31%	2,18%
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%
23	Equity Instruments	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%	25,84%	0,64%	0,00%	0,00%	0,00%	26,12%
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%
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%	0,46%	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%
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%
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%	27,81%	1,34%	0,00%	0,03%	0,47%	69,62%

Template 3: GAR KPI stock as at 31 December 2024 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total covered assets in the denominator)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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	27.72%	1.90%	0.00%	0.01%	0.17%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	**Financial Undertakings**	0.04%	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	0.04%	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	0.04%	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	0.00%	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 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%
11	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
12	of which asset 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 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%
15	Equity Instruments	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 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%
19	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%

	% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m
		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	1.05%	0.33%	0.00%	0.01%	0.17%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.80%	0.16%	0.00%	0.01%	0.05%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.25%	0.17%	0.00%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity Instruments	0.01%	0.01%		0.00%	0.01%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
24	**Households**	26.28%	1.57%	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	26.28%	1.57%	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**	0.35%	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	0.35%	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**	27.72%	1.90%	0.00%	0.01%	0.17%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 3: GAR KPI stock as at 31 December 2024 – Part 2 [%]

		n	o	p	q	r	s	t	u
% (compared to total covered assets in the denominator)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and Advances	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%
6	Equity Instruments	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%
8	Of which investment firms	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%
10	Debt securities, including UoP	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%
12	of which asset management companies	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%
14	Debt securities, including UoP	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%
16	Of which insurance undertakings	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%
18	Debt securities, including UoP	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%

		n	o	p	q	r	s	t	u
% (compared to total covered assets in the denominator)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	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%
24	**Households**	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	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%
27	Of which motor vehicle loans	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%
29	Housing Financing	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%
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%
32	**Total GAR assets**	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 3: GAR KPI stock as at 31 December 2024 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae	af
		31.12.2025									
% (compared to total covered assets in the denominator)		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use 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%	27.85%	1.91%	0.00%	0.01%	0.17%	28.74%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.30%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.30%
4	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.24%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%
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 asset 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%

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to total covered assets in the denominator)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling	
20	**Non-Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	1.18%	0.34%	0.00%	0.01%	0.17%	2.34%
21	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.92%	0.16%	0.00%	0.01%	0.05%	1.78%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.26%	0.17%	0.00%	0.00%	0.12%	0.55%
23	Equity Instruments	0.00%	0.00%		0.00%	0.01%	0.01%		0.00%	0.01%	0.01%
24	**Households**	0.00%	0.00%	0.00%	0.00%	26.28%	1.57%	0.00%	0.00%	0.00%	25.66%
25	Of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%	26.28%	1.57%	0.00%	0.00%	0.00%	18.65%
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%	0.35%	0.00%	0.00%	0.00%	0.00%	0.44%
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%	0.35%	0.00%	0.00%	0.00%	0.00%	0.44%
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%	27.85%	1.91%	0.00%	0.01%	0.17%	70.98%

Template 4: GAR KPI flow for 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to flow of total eligible assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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	12.09%	1.32%	0.00%	0.00%	0.19%	0.01%	0.01%	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%
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	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
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	0.00%	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 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%
11	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
12	of which asset 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 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%
15	Equity Instruments	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 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%
19	Equity Instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to flow of total eligible assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	1.07%	0.32%	0.00%	0.00%	0.19%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.74%	0.16%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.31%	0.13%	0.00%	0.00%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity Instruments	0.02%	0.02%		0.00%	0.01%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
24	**Households**	9.99%	1.00%	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	9.85%	1.00%	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%
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**	0.95%	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	0.95%	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**	12.09%	1.32%	0.00%	0.00%	0.19%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 4: GAR KPI flow for 2025 – Part 2 [%]

		n	o	p	q	r	s	t	u
% (compared to flow of total eligible assets)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and Advances	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%
6	Equity Instruments	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%
8	Of which investment firms	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%
10	Debt securities, including UoP	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%
12	of which asset management companies	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%
14	Debt securities, including UoP	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%
16	Of which insurance undertakings	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%
18	Debt securities, including UoP	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%

		n	o	p	q	r	s	t	u
% (compared to flow of total eligible assets)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
20	**Non-Financial Undertakings**	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and Advances	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.01%	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%
24	**Households**	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	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%
27	Of which motor vehicle loans	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%
29	Housing Financing	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%
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%
32	**Total GAR assets**	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 4: GAR KPI flow for 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to flow of total eligible assets)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use 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%	12.15%	1.33%	0.00%	0.01%	0.19%	23.44%
2	**Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%	0.54%
3	Credit Institutions	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%	0.54%
4	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%	0.36%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.18%
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 asset 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%

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to flow of total eligible assets)		31.12.2025									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + 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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling	
20	**Non-Financial Undertakings**	0.00%	0.00%	0.00%	0.00%	1.14%	0.32%	0.00%	0.01%	0.19%	3.27%
21	Loans and Advances	0.00%	0.00%	0.00%	0.00%	0.79%	0.16%	0.00%	0.00%	0.10%	2.21%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.33%	0.14%	0.00%	0.00%	0.08%	1.04%
23	Equity Instruments	0.00%	0.00%		0.00%	0.02%	0.02%		0.00%	0.01%	0.02%
24	**Households**	0.00%	0.00%	0.00%	0.00%	9.99%	1.00%	0.00%	0.00%	0.00%	18.28%
25	Of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%	9.85%	1.00%	0.00%	0.00%	0.00%	7.81%
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%	0.95%	0.00%	0.00%	0.00%	0.00%	1.35%
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%	0.95%	0.00%	0.00%	0.00%	0.00%	1.35%
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%	12.15%	1.33%	0.00%	0.01%	0.19%	79.22%

Template 5: KPI off-balance-sheet exposures as at 31 December 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.60%	0.59%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	34.29%	9.97%	0.00%	0.74%	7.27%	20.56%	0.11%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures as at 31 December 2025 – Part 2 [%]

		n	o	p	q	r	s	t	u
% (compared to total eligible off-balance sheet assets)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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%
2	Assets under management (AuM KPI)	0.66%	0.01%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures as at 31 December 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.60%	0.59%	0.00%	0.00%	0.40%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	55.56%	10.08%	0.00%	0.74%	7.27%

Template 5: KPI off-balance-sheet exposures in relation to flow for 2025 – Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		31.12.2025												
		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 Proceeds	Of which transitional	Of which enabling			Of which Use Proceeds	Of which enabling			Of which Use 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%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	20.85%	3.73%	0.00%	0.58%	2.28%	13.38%	1.72%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures in relation to flow for 2025 – Part 2 [%]

		n	o	p	q	r	s	t	u
% (compared to total eligible off-balance sheet assets)		31.12.2025							
		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use Proceeds	Of which enabling			Of which Use 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%
2	Assets under management (AuM KPI)	5.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 5: KPI off-balance-sheet exposures in relation to flow for 2025 – Part 3 [%]

		v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		31.12.2025								
		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 Proceeds	Of which enabling			Of which Use Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	39.47%	5.45%	0.00%	0.58%	2.28%

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 undertakings that are subject to non-financial reporting requirements under Corporate Sustainability Reporting Directive (CSRD).

The disclosures have been prepared based on data published by the Group's customers within their taxonomy disclosures for 2024.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 31.12.2025

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) [Mn PLN]

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**	**4,365**	**1.71%**	**4,365**	**1.71%**	**1**	**0.00%**
8.	**Total applicable key performance indicator**	**4,365**	**1.71%**	**4,365**	**1.71%**	**1**	**0.00%**

Template 3: Taxonomy-Aligned Business Activities (Numerator) [Mn PLN]

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**	**4,365**	**100.00%**	**4,365**	**99.98%**	**1**	**0.02%**
8.	**Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator**	**4,365**	**100.00%**	4,365	**99.98%**	**1**	**0.02%**

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [Mn PLN]

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 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-eligible but not 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-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 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	2	0.00%	2	0.00%	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	10	0.00%	10	0.00%	0	0.00%
6.	Amount and share of taxonomy-eligible but not 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	1	0.00%	1	0.00%	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**	**64,726**	**25.42%**	**64,445**	**25.31%**	**281**	**0.11%**
8.	**Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator**	**64,739**	**25.42%**	**64,458**	**25.31%**	**281**	**0.11%**

Template 5: Non-Taxonomy-Eligible Business Activities [Mn PLN]

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**	**34,008**	**13.35%**
8.	**Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator**	**34,008**	**13.35%**

Disclosures Based on Counterparty Key Performance Indicator by Capital Expenditures (KPI Capex) – Green Asset Ratio as of 31.12.2025

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) [Mn PLN]

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	2	0.00%	2	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**	**4,857**	**1.91%**	**4,849**	**1.90%**	**8**	**0.00%**
8.	**Total applicable key performance indicator**	**4,858**	**1.91%**	**4,850**	**1.90%**	**8**	**0.00%**

Template 3: Taxonomy-Aligned Business Activities (Numerator) [Mn PLN]

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	2	0.03%	2	0.03%	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**	**4,857**	**99.97%**	**4,849**	**99.81%**	**8**	**0.16%**
8.	**Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator**	**4,858**	**100.00%**	4,850	**99.84%**	**8**	**0.16%**

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [Mn PLN]

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 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-eligible but not 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-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 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	25	0.01%	25	0.01%	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	7	0.00%	7	0.00%	0	0.00%
6.	Amount and share of taxonomy-eligible but not 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	7	0.00%	7	0.00%	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**	**65,967**	**25.90%**	**65,705**	**25.80%**	**262**	**0.10%**
8.	**Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator**	**66,006**	**25.92%**	**65,744**	**25.82%**	**262**	**0.10%**

Template 5: Non-Taxonomy-Eligible Business Activities [Mn PLN]

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**	**32,249**	**12.66%**
8.	**Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator**	**32,249**	**12.66%**

Disclosures Based on Counterparty Key Performance Indicator by Turnover (KPI Turnover) – Green Asset Ratio in Relation to Flow in 2025

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) [Mn PLN]

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**	**1,065**	**1.14%**	**1,065**	**1.14%**	**0**	**0.00%**
8.	**Total applicable key performance indicator**	**1,065**	**1.14%**	**1,065**	**1.14%**	**0**	**0.00%**

Template 3: Taxonomy-Aligned Business Activities (Numerator) [Mn PLN]

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**	**1,065**	**100.00%**	**1,065**	**99.99%**	**0**	**0.01%**
8.	**Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator**	**1,065**	**100.00%**	**1,065**	**99.99%**	**0**	**0.01%**

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [Mn PLN]

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 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-eligible but not 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-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 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	1	0.00%	1	0.00%	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	5	0.01%	5	0.01%	0	0.00%
6.	Amount and share of taxonomy-eligible but not 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	1	0.00%	1	0.00%	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**	**9,469**	**10.17%**	**9,466**	**10.16%**	**3**	**0.00%**
8.	**Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator**	**9,476**	**10.18%**	**9,473**	**10.17%**	**3**	**0.00%**

Template 5: Non-Taxonomy-Eligible Business Activities [Mn PLN]

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**	**17,020**	**18.28%**
8.	**Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator**	**17,020**	**18.28%**

Disclosures Based on Counterparty Key Performance Indicator by Capital Expenditures (KPI Capex) – Green Asset Ratio in Relation to Flow in 2025

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) [Mn PLN]

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**	**1,234**	**1.32%**	**1,228**	**1.32%**	**6**	**0.01%**
8.	**Total applicable key performance indicator**	**1,234**	**1.33%**	**1,228**	**1.32%**	**6**	**0.01%**

Template 3: Taxonomy-Aligned Business Activities (Numerator) [Mn PLN]

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	0.01%	0	0.01%	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**	**1,234**	**99.99%**	**1,228**	**99.54%**	**6**	**0.45%**
8.	**Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator**	**1,234**	**100.00%**	**1,228**	**99.55%**	**6**	**0.45%**

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [Mn PLN]

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 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-eligible but not 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-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 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	16	0.02%	16	0.02%	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	4	0.00%	4	0.00%	0	0.00%
6.	Amount and share of taxonomy-eligible but not 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	2	0.00%	2	0.00%	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**	**10,008**	**10.75%**	**10,004**	**10.74%**	**3**	**0.00%**
8.	**Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator**	**10,030**	**10.77%**	**10,027**	**10.77%**	**3**	**0.00%**

Template 5: Non-Taxonomy-Eligible Business Activities [Mn PLN]

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**	**16,296**	**17.50%**
8.	**Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator**	**16,296**	**17.50%**

13.3 Information relating to social matters

13.3.1 Own workforce [ESRS S1]

More than 90% (92.3%) of the Pekao Group's employees are employed by the Bank. It is the Bank, as the parent company, that plays a leading role in setting standards and establishing practices in the area of workforce management across the organisation. The impacts relating to own workforce that are considered material at the Bank translate into the other companies in the Group. For this reason, we base the description of workforce matters primarily on information relating to persons employed by the parent company.

13.3.1.1 Managing impacts, risks and opportunities [SBM-3]

Social matters, including workforce matters, have a special place in the Strategy. We place a strong emphasis on aspects related to inclusiveness in the structure of management employment and pay equality. Our employees' engagement and their identification with the organisation, which we want to develop in line with our redefined mission and vision, remain an equally important area for us. In order to achieve these assumptions, we need a strong and stable organisational culture, which we have decided to strengthen with new values. To the existing values: PROSTO (STRAIGHTFORWARDLY), RAZEM (TOGETHER), ODWAŻNIE (BOLDLY) and ODPOWIEDZIALNIE (RESPONSIBLY), we have therefore added: Z DETERMINACJĄ (WITH DETERMINATION), OTWARCIE (OPENLY) and UCZCIWIE (HONESTLY), thereby indicating the applicable standards of cooperation, the preferred style of operation and the desired attitudes.

We are ambitious to create more than a workplace – to build a community in which everyone can realise their potential and ambitions, supported by safe and stable working conditions that foster higher motivation, satisfaction and employee engagement. To that end, we apply relevant internal regulations and implement measures tailored by topic and/or target group, which support our employees in achieving the goals they set for themselves. In doing so, we seek not only to retain our people, but also to attract talented candidates from the market – collaboration-oriented, entrepreneurial and innovative – who will strengthen the organisation in delivering its strategic objectives.

Our approach to workforce matters is recognised in the market, placing Bank Pekao among the country's best employers. This is evidenced, among other things, by the Top Employer 2025 title, which we have received for the fifteenth time. We confirmed the effectiveness of our human resources management practices in building an organisation where care for employees, their development and wellbeing are paramount, by ranking as a Bank among the top ten out of nearly eighty awarded companies.

Our own workforce comprises:

- employees within the Bank's sphere of influence: individuals employed under employment contracts (both fixed-term and indefinite);
- (both fixed-term and indefinite);
- non-employees: individuals providing services under cooperation agreements (B2B) or contracts.

The identified material impacts relating to our own employees mainly apply to employees engaged under employment contracts and to individuals associated with the Bank under civil law contracts (contracts for specific work and contracts of mandate); these impacts are described in chapter [IRO-1].

The identified material impacts relating to our own employees are described in chapter

Our internal regulations – policies, procedures, rules and regulations – comply with generally applicable law, the principle of equality before the law and non-discrimination in employment. These regulations mainly apply to employees engaged under employment contracts and to individuals associated with the Bank under civil law contracts (contracts for specific work and contracts of mandate). Their purpose is to support the proper management of the organisation, as well as the management of material impacts, risks and opportunities relating to own workforce.

In the case of individuals who are not employees of the undertaking but form part of its own workforce, we apply the general provisions of law. In addition, regulatory matters relating to the group of non-employees who form part of our own workforce are presented in the disclosure that directly concerns them.

Human rights in the context of *the Pekao Group Code of Conduct*

As an institution of public trust, we comply with applicable law and supervisory recommendations, applying best market practice and recognised service standards. We do not tolerate or accept any form of violence or human rights violations, and every employee is responsible for maintaining a supportive and respectful working environment, consistent with our core values and adopted principles of ethical conduct. We are committed to respecting human rights and human dignity in every aspect of our operations, as reflected, among other things, in *the Pekao Group Code of Conduct* (hereinafter: *the Code of Conduct*). The document broadly presents a specific framework of conduct that we consider ethical. It also addresses human rights issues within our organization but does not in itself constitute a policy within the meaning of minimum disclosure requirements (MDR-P).

In *the Code of Conduct*, we set out the key values and principles that apply across the Pekao Group in all areas of its operations, as well as within its organisational culture and value system. The document states explicitly that *We respect and protect human rights in accordance with legal requirements and international standards.*

In *the Code of Conduct*, we set out the key values and principles that apply across the Pekao Group in all areas of its operations, as well as within its organisational culture and value system. The document states explicitly that we respect and protect human rights in accordance with legal requirements and international standards.

Further information on *the Pekao Group Code of Conduct* is provided in chapter [ESRS G1].

We have also embedded social and environmental standards in our [procurement regulations]. In this way, we promote these standards among our intermediaries, counterparties and suppliers as part of measures designed to ensure an ethical, fair and sustainable value chain.

Moreover, as a member of the United Nations Global Compact, we fully align ourselves with the 10 Global Compact Principles, supporting sustainable development initiatives, including those relating to respect for human rights and improvements in working conditions.

The 10 Global Compact Principles:

1.Support and respect the protection of internationally proclaimed human rights

2.Ensure that your company does not participate in any way in the violation of human rights

3.Respect the freedom of association

4.Eliminate all forms of forced or compulsory labour

5.Eradicate all forms of child labour

6.Effectively combat discrimination in the workplace

7.Take a preventive approach to environmental protection

8.Develop initiatives and practices aimed at promoting environmental responsibility

9.Encourage the development and diffusion of environmentally friendly technologies

10. Work against corruption in all its forms, including extortion and bribery

To systematise processes and monitoring mechanisms for potential breaches of the principles of the Global Compact initiative and the OECD Guidelines for Multinational Enterprises, in September 2025 we implemented the *Procedure for the disclosure of information by Bank Pekao S.A. on compliance with the principles of the United Nations Global Compact initiative* (Order No. C/20/2025 of 19.09.2025). Under the adopted regulation, the review and assessment of compliance with the above principles will be conducted on an annual reporting cycle, based on selected indicators and data submitted by the Bank's organisational units. By implementing this Procedure, we meet the requirements arising from R*egulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019* on sustainability-related disclosures in the financial services sector, i.e. *the SFDR (Sustainable Finance Disclosure Regulation).*

Secure employment conditions

As an employer, we focus on employment stability, as evidenced, among other things, by a low employee turnover rate of 10.52% and an average length of service of 15 years for individuals employed under employment contracts, excluding individuals employed at 0.1 FTE (as at 31.12.2025). Long-term cooperation reflects a high level of employee satisfaction and is underpinned by lasting relationships built on secure employment conditions through appropriate internal regulations applied at the Bank.

The primary document governing work organisation and workplace rules at the Bank is *the Work Regulations* (hereinafter: *the Regulations*). This constitutes an internal source of labour law; it sets out the rights and obligations of the employer and of employees employed under an employment contract, regardless of the nature of their duties or the position held. Every newly hired employee is required to confirm that they have read the document. We subject *the Regulations* to periodic reviews and, where necessary, update their provisions in agreement with trade union organisations and in line with generally applicable law.

For termination of employment, we apply notice periods resulting from the Labour Code or directly from employment contracts, which ensure at least the same benefits as those provided for under labour law. In 2025, we predominantly applied one- or three-month notice periods. In addition, we conduct consultations regarding termination of employment contracts in accordance with applicable national regulations.

For termination of employment, we apply notice periods resulting from the Labour Code or directly from employment contracts, which ensure at least the same benefits as those provided for under labour law. In 2025, we predominantly applied one- or three-month notice periods. In addition, we conduct consultations regarding termination of employment contracts in accordance with applicable national regulations.

Employees' working time and work–life balance

We enable our employees to work outside the employer's premises on the terms set out in detail in *the Agreement on the rules for performing remote work*, concluded between the Bank and the Trade Unions on the basis of the amended provisions of *the Labour Code*. This Agreement sets out, in detail, both the organisation of remote work and the corresponding rights and obligations of the employer and the employee. In addition, taking account of employees' expectations, we consider on a case-by-case basis requests relating to non-standard working hours or changes to the location from which remote work is performed, demonstrating a flexible approach to their needs. Employees raising children under the age of 8 are also able to work remotely to a greater extent.

Adequate pay

We treat our employees fairly and ensure adequate pay through a consistent remuneration system, including non-pay benefits. The remuneration strategy embedded in the applicable internal regulations, which supports the protection and strengthening of the Bank's reputation is the key element of this system.

The principal regulation is *the Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna* (hereinafter: *the Remuneration Policy*), available on the intranet. This Policy reflects the Bank's mission and values in its approach to remuneration systems, and in particular:

- The principal regulation is the *Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna* (hereinafter: *the Remuneration Policy*), available on the intranet. This Policy reflects the Bank's mission and values in its approach to remuneration systems, and in particular:
- defines the pillars of remuneration and the management of the structure, corporate processes and organisational processes;
- confirms the requirement that adopted remuneration systems comply with generally applicable law.

The remuneration structure provides a direct link between remuneration and performance by safeguarding financial stability and setting variable remuneration levels appropriate to the Bank's financial capacity; establishing performance-based remuneration caps; and designing incentive schemes that specify minimum performance levels for the Bank below which no bonus is paid. Variable remuneration covers all remuneration components whose award is conditional on performance, and its payment depends directly on individual achievements, a compliance assessment, and the results achieved by the Bank and adjusted for risk.

A permanent element of remuneration is base salary, which we pay for the position held and the scope of duties and responsibilities. This remuneration reflects both the experience, skills and competences required for a given position and the level of commitment to achieving the Bank's results. Since fixed remuneration represents a substantial part of total remuneration, we are able to pursue a flexible remuneration policy.

The Bank monitors market trends regarding forms of remuneration and pay levels offered in the market to ensure the competitiveness of remuneration structures, as well as their transparency and an effective and fair remuneration system. Decisions concerning the remuneration system are taken based on information on market trends in fixed remuneration as well as incentive schemes. We obtain these data from advisory firms analysing the financial sector. We also prepare an annual report on the operation of the remuneration policy, which consists of two internal regulations: *the Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna and the Remuneration Policy of the Members of the Supervisory Board and the Management Board of Bank Polska Kasa Opieki Spółka Akcyjna.*

The annual report assessing the operation of the remuneration policy is prepared by the Nomination and Remuneration Committee based on the report on the operation of the remuneration policy for a given year submitted by the Bank's Management Board. Subsequently, following approval of the report assessing the operation of the remuneration policy for a given year by the Bank's Supervisory Board, it is presented to the General Meeting of Shareholders (GMS) in order to assess whether the Bank's remuneration policy supports the Bank's development and the security of its operations.

Social dialogue; freedom of association; employee councils; employees' rights to information, consultation and participation; collective bargaining, including the percentage of employees covered by collective agreements

We maintain ongoing communication with our employees and respect their right to establish and join trade unions, conducting open and transparent dialogue with all trade union organisations operating at the Bank, as well as with the Employee Council. In relations with trade unions, we are guided by the principle of good faith and by the pursuit of optimal solutions in the field of collective labour law, taking into account the interests of both employees and the Bank.

The principles of the Bank's HR and pay policy, including employees' remuneration conditions, are governed by the *Company Collective Labour Agreement (Zakładowy Układ Zbiorowy Pracy – ZUZP*; hereinafter: the ZUZP). The document contains a detailed description of all remuneration components and work-related benefits, such as base salary, quarterly bonuses, a motivational award and a holiday bonus. It also sets out the rules for remuneration for overtime work and governs other benefits, including retirement, disability and death severance payments, as well as compensation for accidents at work.

Amendments to the ZUZP are introduced through negotiations with the trade union organisations that are its Parties, and each change is documented in an additional protocol, which is registered by the Regional Labour Inspector. The ZUZP is available to all Bank employees on the intranet website, while newly hired individuals receive information about the ZUZP in their employment contract.

In 2025, the percentage of the Bank's employees covered by a collective agreement amounted to 78.9% (versus 77% in 2024). No collective agreements were concluded in the Pekao Group's subsidiaries.

Gender equality, equal pay for work of equal value, and workplace diversity

The Bank has in place a *Gender Equality and Diversity Policy applicable to the Bank's employees, including members of the Supervisory Board, members of the Management Board and key functions holders at Bank Polska Kasa Opieki Spółka Akcyjna* (hereinafter: *the Gender Equality and Diversity Policy*), through which we promote equal treatment and prevent discrimination in the workplace.

In line with this policy, we ensure that Bank employees can manage their careers effectively, achieve success and have their work assessed based on individual performance, regardless of gender. In addition, as part of our integration commitments and actions supporting employee groups particularly exposed to risk, Chapter III of *the Gender Equality and Diversity Policy* includes provisions on supporting people returning to work after a prolonged absence, for example after parental leave.

The *Policy* incorporates the Bank's diversity strategy, which emphasises the delivery of tasks by our employees to the highest standards, the application of objective, merit-based criteria, and the inclusion of diversity considerations when assessing competencies and selecting persons to serve on the Supervisory Board, the Management Board and in key functions at the Bank. Furthermore, we apply the guidelines on gender equality in all HR processes. In practice, this means that we:

- strive to ensure representation of both genders in internal and external recruitment processes by preparing shortlists for a given role that include at least one candidate of each gender;
- strive to ensure representation of both genders in internal and external recruitment processes by preparing shortlists for a given role that include at least one candidate of each gender;
- inform our external partners in training and recruitment (including employment agencies, temporary work agencies, job placement/intermediation agencies, head-hunters and labour offices) about the scope of *the Gender Equality and Diversity Policy* implemented at the Bank and our application of its guidelines;
- inform our external partners in training and recruitment (including employment agencies, temporary work agencies, job placement/intermediation agencies, head-hunters and labour offices) about the scope of the Gender Equality and Diversity Policy implemented at the Bank and our application of its guidelines;
- ensure equal treatment in pay and fringe benefits regardless of gender, in accordance with *the Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna* and generally applicable law;
- promote employees' work–life balance by making available procedurally regulated solutions such as:

− flexible working arrangements (part-time employment, etc.) in compliance with applicable laws, in particular labour and social security regulations, as well as internal rules, while taking account of business and organisational requirements and needs;

− support for employees during and after long-term absence (e.g. parental leave, unpaid leave, illness or other extended breaks from work) through the possibility of maintaining ongoing contact with the Bank during absence and facilitating a return to work in line with applicable laws (in particular labour and social security regulations) and the Bank's internal rules;

− educational programmes on gender equality delivered, among other things, as part of onboarding programmes and other forms of training, also addressed to managers – for example the e-learning module "*Equal treatment in employment*", aimed at all managers.

Applying the guidelines set out in *the Gender Equality and Diversity Policy* also includes monitoring the remuneration structure. In 2025, the unadjusted gender pay gap at the Bank amounted to 28.50%, which represents a decrease compared to 30.99% in 2024. The adjusted gap, calculated as a weighted average for employee sub-groups taking into account grade levels, job families and the division in which a given employee is employed, amounted to 0.95% in the same reporting period (vs. 2.18% in 2024). The results of this monitoring support decisions on verifying pay levels for work of equal value, in order to maintain balance and fairness in this area as well.

We seek to maintain gender balance among managers covered by succession plans, where senior management includes members of the Bank's Management Board and Directors of Divisions, Centres and Departments reporting directly to the Management Board. We provide equal opportunities for promotion and professional development regardless of gender, which supports the creation of a balanced and inclusive working environment.

We also run a range of development initiatives, support diversity and encourage employees to put forward their own ideas and actively engage with the projects we have launched – so that they have the conditions to develop their potential and feel recognised. For managers in particular, we deliver training based on the Insight Discovery methodology to raise awareness of diversity management. These workshops focus on recognising employees' diverse needs and identifying effective motivation methods depending on age, experience, skills and competencies.

Employee training and skills development

Education and competence-building for Bank employees are important to us. We recognise that professional development opportunities have a positive impact – on the one hand – on employees' sense of belonging to the organisation and – on the other – on the delivery of tasks necessary to achieve the organisation's goals. This is why we offer a diverse range of educational programmes for Bank employees, including:

- local training and general development webinars;
- international training and programmes;
- mentoring and group/team coaching;
- individual internal and external coaching;
- certification training, e.g. CFA/ACCA/CIA.

The processes relating to employees' participation in specific forms of professional upskilling are set out in *the Training, Professional Qualifications and Development Activities Policy for employees of Bank Pekao S.A.*, which addresses in detail:

- procedures for classroom-based group training, remote training and e-learning;
- procedures for individual domestic training, certification courses, language courses, postgraduate studies and MBA programmes;
- training needs assessment.

Occupational health and safety

Another fundamental and equally important issue for us is occupational health and safety (OHS). It underpins employees' comfort and the quality of their work. Accordingly, using available technologies appropriately and in line with regulations, we educate employees in this area and inform them about all aspects of the working environment.

OHS activities are governed by *the Regulation of the Council of Ministers of 2 September 1997 on the occupational health and safety service*, which specifies in detail the qualifications required for employees of the OHS Office and the scope of their duties. We implement the provisions of this Regulation, among other things, through systematic inspections of working conditions, taking into account how processes are organised and how they affect working conditions, the technical condition of premises, and submitted requests relating to OHS requirements.

We have two key internal OHS regulations: *the Occupational Health and Safety and Fire Protection Rules* and *the Bank Pekao S.A. Group OHS Policy*. These documents are developed and implemented by the OHS Office within the Logistics and Cash Operations Department. Substantive oversight of the Office's activities is exercised by the Vice-President of the Bank's Management Board responsible for the Branch Distribution, Private Banking and Operations Division. Certain issues in this area are also governed by the Work Regulations. These documents serve as a baseline when developing internal instructions and procedures addressed to employees.

Measures to prevent violence and harassment in the workplace

In workforce matters, including those relating to violence and harassment in the workplace, we apply *the Procedure for preventing mobbing, discrimination, harassment or other undesirable behaviour at Bank Polska Kasa Opieki Spółka Akcyjna*. The provisions of this document express our zero tolerance for any manifestations of discrimination and our commitment to counteracting them; they also describe mechanisms for handling employee complaints about unethical practices, including violence and harassment.

More information about this procedure and the mechanisms themselves is provided in chapter [ESRS G1].

Minimum disclosure requirements for policies relating to own workforce:

POLICY NAME	IRO	APPROVING BODY	SCOPE/EXCLUSIONS
Pekao Group Code of Conduct	Human rights, including labour rights	Management Board of the Bank	Group
Work Regulations of Bank Polska Kasa Opieki Spółka Akcyjna	Stable employment conditions	President of the Bank's Management Board	Bank
Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna	Remuneration and payment rules; gender pay gap	Supervisory Board	Bank
Agreement on the rules for performing remote work, setting out the organisation and order of the remote work process and the related rights and obligations of the Bank and employees	Employees' rights; consideration of employees' views; work–life balance	Director of the Human Resources Division (currently: People, Operations and CX Division)	Bank
People, Operations and CX Division)	Dialogue with employees; freedom of association; consideration of employees' views	Management Board of the Bank	Bank
Gender Equality and Diversity Policy applicable to the Bank's employees, including members of the Supervisory Board, members of the Management Board and persons performing key functions at Bank Polska Kasa Opieki Spółka Akcyjna	Creating a supportive workplace and preventing discrimination	Supervisory Board	Bank
Training, Professional Qualifications and Development Activities Policy for employees of Bank Pekao S.A.	Access to training and skills development; creating a supportive workplace and preventing discrimination	Management Board of the Bank	Bank
Occupational Health and Safety and Fire Protection Rules and the Bank Pekao S.A. Group OHS Policy in terms of occupational health and safety	Ergonomic workplaces and employees' mental health; workplace accidents	Supervisory Board	Bank
Procedure for preventing mobbing, discrimination, harassment or other undesirable behaviour at Bank Polska Kasa Opieki Spółka Akcyjna	Creating a supportive workplace and preventing discrimination; preventing violence and harassment	President of the Bank's Management Board	Bank
Whistleblowing procedure in Bank Pekao S.A.	Preventing violence and harassment	Management Board of the Bank	Bank
Anti-corruption policy in the Bank Pekao S.A. Group	Creating a supportive workplace; preventing discrimination; preventing violence	Management Board of the Bank	Group

Procedures for engaging with own workforce and employee representatives on impacts [S1-2]

The organisational culture we foster is built on cooperation, openness to diversity and attitudes aligned with the values updated in 2025: PROSTO (STRAIGHTFORWARDLY), RAZEM (TOGETHER), ODWAŻNIE (BOLDLY) and ODPOWIEDZIALNIE (RESPONSIBLY), joined by Z DETERMINACJĄ (WITH DETERMINATION), OTWARCIE (OPENLY) and UCZCIWIE (HONESTLY). We are building a place where leaders inspire, employees have genuine influence, and the organisation responds flexibly to change.

To strengthen a culture of dialogue and build an environment grounded in mutual trust, we focus on initiatives that help us better understand the needs and expectations of our employees. Accordingly:

1. In Q4 2025, we prepared to conduct the Organisational Health Survey, which started on 13 January 2026 and will run until 5 February 2026. It covers all Bank employees (employed under employment contracts). By analysing the results, we aim to understand:

- overall organisational health, i.e. the organisation's ability to deliver its objectives and vision;
- nine health elements indicating whether actions taken in the organisation deliver the intended outcomes and reflecting how employees perceive organisational effectiveness in key areas;
- several dozen managerial practices, i.e. behaviours that "drive" the health elements;
- ten dimensions of employees' individual experience, indicating how management practices affect their energy and productivity;
- psychophysical condition across two dimensions: holistic health and burnout.

2. We take care of health:

Based on the results of the 2024 Employee Engagement and Satisfaction Survey and the Psychophysical Condition Survey, and the conclusions drawn from them, our organisational culture activities in 2025 also focused on mental health. In 2025 we launched two programmes:

- For all Bank employees: *the Razem w dobrostanie (Together in wellbeing)* programme, under which we delivered a series of psychoeducation and prevention initiatives on mental health and resilience. The aim is to strengthen employees' wellbeing and effectiveness and support healthy functioning in the workplace environment.

  As part of the programme, we held psychoeducation webinars on:

– *Mental health and its pillars. How to take care of inner balance and build resources for wellbeing?*

– *How not to lose yourself at work. Stress, burnout and inner balance.*

– *Neurodiversity. How to harness the potential of working in a neurodiverse team?*

– *Pause. How to break the spiral of fatigue and declining energy?*

– *We also delivered an educational series Neuromoc (Neuropower) – support for the nervous system (microlearning).*

- For HR Business Partners (HRBPs) and Leaders: *the "Notice. Respond. Support. Mental Health Navigator"* programme – a series of workshops focused on developing leaders' and teams' competencies. The aim was to equip participants with professional intervention tools and develop their ability to recognise and respond to workplace mental health crises. During the workshops, participants learned response scenarios for fifteen of the most common mental health risks at work.

  This programme addressed current needs in the areas of social fairness and employees' health and safety. Delivering this initiative supported our efforts to build lasting organisational capability in managing employee wellbeing.

  Almost 1,200 participants attended the kick-off meetings for *Mental Health Navigator* and eight workshop sessions (*"Face to Face"* and *"Eyes Wide Open"*) held in Q2 and Q3 2025.

3. We delivered additional initiatives supporting a culture of dialogue with employees:

- *Values in dialogue with employees* communication campaign – a key educational initiative that helped bring the Bank's values closer to employees in a more direct way, based on concrete examples. The campaign also included employee activation elements by inviting them to take part in quizzes
- Town hall (26 May 2025) – an event in the form of open communication with employees about key aspects of organisational life, including its values, attended by members of the Management Board and employees onsite and online. We ensured two-way communication (questions from the audience and an active power chat for remote participants).
- *Rodzina na bank* (*Family, you can bank on it*) initiative – events for employees and their children organised on the occasion of Family Day and Children's Day. In 2025, we expanded the initiative to multiple locations: three main events in Warsaw, Gdańsk and Kraków, and local events in nearly 50 Bank branches across Poland. After the events, employees could share feedback via a dedicated survey.
- *Prosto po imieniu* (*Say it by Name*) campaign – promoting direct and open communication and encouraging employees to practise it day to day. Members of the Management Board and volunteering Bank employees took part.
- An additional competition focused on values at the summer *Pekao Cup 2025*, as an example of employee dialogue during company events.

In 2025, we focused on actions supporting the process of building an aspirational organisational culture, identified as one of the directions of the Bank's new strategy. We intensified efforts to promote the new catalogue of values and embed them in day-to-day organisational life – hence, among other things, the "Values in dialogue with employees" campaign as an open form of communication facilitating employee dialogue and understanding of value-driven attitudes; the organisation of "Rodzina na bank" events in the spirit of the value RAZEM (TOGETHER); and integrating values into HR processes such as the annual performance review process.

In 2026, we plan to:

- conduct the Organisational Health Index (OHI) survey – the survey focuses on aspects of organisational culture and health and delivers an overall assessment of the organisation's ability to implement its strategy effectively. This assessment is based on employees' experiences – their feedback makes it possible to identify strengths and areas for improvement in the health elements and key management practices. The survey includes a module on individual employee experiences. Within that module, the eNPS indicator serves as a proxy measure of employee engagement;

- run another edition of the Children's Day and Family Day event – based on the conclusions from the surveys carried out after the events held in 2025 and in line with employees' expectations, we want to again organise meetings in multiple locations, with the involvement of our branches across the country;
- organise an event dedicated to promoting our values (as a continuation of the process of embedding them) and to building customer experience – a full-day event for all Bank employees (registration required), during which we will invite active participation in lectures, presentations and workshops delivered by external guests and the Bank's experts;
- promote our values at sporting events (*Pekao Cup 2026*) – we know from the survey conducted after the summer competitions in 2025 that the formula of promoting values through a specially designed competition was received very positively by participants;
- run competitions in the form of challenges on the Bank's internal platform – recognising employees and teams who, through specific actions, delivered projects and initiatives, exemplify attitudes consistent with the Bank's values;
- organise a series of managers' meetings with their teams, during which they will address the topic of values and how to translate specific behaviours and attitudes into day-to-day work.

The Bank's cooperation with trade unions is described in the chapter *Policies related to own workforce resources* of this Report. The person operationally responsible for ensuring that this cooperation takes place and that its outcomes influence the Bank's approach is the Director of the Head Office HR Business Partners and Employee Relations Office. The effectiveness of cooperation with trade union organisations is assessed by: agreements signed with trade union organisations in the area of bargaining and negotiations arising from generally applicable labour law as well as internal labour law, and the absence of collective disputes referred to in the Act of 23 May 1991 on the Resolution of Collective Disputes with representative organisations in the Bank.

Remediation processes for negative impacts and channels for raising concerns by own workforce [S1-3]

We fully respect employees' rights to freedom of association, information and consultation. There are nine trade union organisations operating in the Bank, with 53.13% of employees unionised (as of 31 December 2025). Under labour law, trade union organisations conduct negotiations and bargaining with the Bank on matters related to internal workplace labour law, representing all employees engaged under employment contracts. Also in individual employment matters, trade union organisations represent their members or employees who ask them to represent them vis-à-vis the employer. Trade union organisations have dedicated pages available to them on the intranet to inform employees about important workforce matters, including the course of the dialogue conducted with the employer.

With regard to the right to information and consultation – under the provisions of the Act of 7 April 2006 on Informing Employees and Consulting Them – employees were also represented by the Employee Council of Bank Pekao S.A., whose term ended on 21 February 2025. More information about the Employee Council is provided in section [S1-1].

Our approach to preventing negative impacts and ensuring remedy where such impacts occur is presented primarily in the provisions of two procedures: *the Procedure for Preventing Mobbing, Discrimination, Harassment or Other Undesirable Behaviour at Bank Polska Kasa Opieki Spółka Akcyjna*, and *the Procedure for Reporting Breaches (Whistleblowing) at Bank Pekao S.A.*

These regulations indicate the channels established within the organisation that enable employees to report irregularities and describe how reports are handled after receipt, verification and consideration. The procedures also contain a detailed description of the rules for protecting reporting persons and whistleblowers against retaliatory actions. More information on the procedures and their scope is provided in section [ESRS G1].

We do not carry out structured assessments of the level of employees' trust in the processes and tools (channels) for raising concerns or needs, or in the way the organisation responds to them. However, each employee is required to familiarise themselves with the above procedures and confirm this in a dedicated statement. In addition, with respect to *the Procedure for Reporting Breaches (Whistleblowing)*, training is provided for new employees and periodic refresher training is delivered to all employees.

Actions in relation to material impacts on own workforce and approaches to managing material risks and leveraging material opportunities, and the effectiveness of those actions [S1-4]

The actions we take as part of managing material impacts on our own workforce are aligned with the applicable regulations on preventing mobbing and corruption and on reporting breaches (whistleblowing), which we describe in detail in [ESRS G1] on corporate governance.

In our organisation, the duty to respect human rights rests with all employees of the Pekao Group regardless of role, length of service, place of work or working-time arrangement. To underline this, we:

- implement and apply internal regulations to shape a working environment free from practices that infringe human rights;
- build an organisational culture based on open communication, trust and mutual respect; we maintain ongoing communication with stakeholders through, among other things, business and internal meetings (e.g. councils, workshops, committees), training, employee surveys, reports, social media interactions – enabling us to optimise our actions with respect to human rights;
- ensure appropriate working conditions by properly equipping office space, respecting the possibility of remote work; we promote work–life balance, employee development and wellbeing.

To support employees' comfort at work and wellbeing, we offer solutions such as remote work, flexible working hours or part-time employment. In this way, we respect individual preferences regarding how and where work is performed and express our support for maintaining an appropriate balance between employees' professional and private lives. We also organise a number of initiatives related to mental health, physical activity and health education.

Dialogue with employees is important to us; therefore, we communicate with them on an ongoing basis using internal channels available within the organisation, such as the intranet, chats and discussion forums. We also organise on-site and online meetings with the Management Board, during which we can exchange comments and insights directly in Q&A sessions. We support employees' right to establish and join trade unions, conducting an open and transparent dialogue with all trade union organisations operating in the Bank as well as with the Employee Council. In 2025, as in previous years, we cooperated with trade union organisations in the area of bargaining, negotiations and consultations, on the terms set out in labour law, respecting the interests of both parties and the principles of social dialogue. In relations with trade unions, we act in good faith and strive to develop optimal solutions in the area of collective labour law, taking into account the interests of both employees and the Bank

In 2025, a total of 35 one- or two-day meetings were held, mainly concerning:

- the level of funds allocated for pay rises in 2025;
- agreeing the allocation of the motivational awards fund for the previous year;
- agreeing the rules for distributing the bonus fund in individual quarters;
- agreeing the spending plan for the Company Social Benefits Fund for the year and amendments to the Company Social Benefits Fund regulations in the area of the benefits system;
- meetings with members of the Bank's Management Board;
- presenting information on the survey of employee engagement and psychophysical resilience;
- bargaining under Article 241^2 of the Labour Code; including employees engaged under managerial contracts (employment contracts) in the Company Collective Labour Agreement (ZUZP);
- consultation on the intention to carry out collective redundancies;
- presenting the Voluntary Redundancy Programme launched in 2025.

In addition, on 19 November 2025, following bargaining, the Bank and four trade union organisations that are parties to the ZUZP signed a Supplementary Protocol to the ZUZP introducing a *quantitative–qualitative bonus scheme for retail network sales staff and Contact Centre sales staff*, set out in *Appendix 4D to the ZUZP.* The Supplementary Protocol was registered by the Regional Labour Inspectorate in Warsaw.

At the Bank, we document the course of social dialogue and support communication between trade union organisations and employees by providing dedicated intranet pages. This enables organisations to publish their own bulletins and information on material workforce matters, including the course of dialogue with the employer.

Until 21 February 2025, the Employee Council of Bank Pekao S.A. (the "Employee Council") operated as an independent employee representation body. The rules for its election, its purpose and its powers are set out in the *Act of 7 April 2006 on Informing Employees and Consulting Them.* The Council comprises 7 members elected in universal elections in which all Bank employees may stand.

Under the above Act, the Bank, as an employer, informs the Council about:

- its activities and economic situation and anticipated changes in this respect;
- the status, structure and anticipated changes in employment and actions aimed at maintaining employment levels;

- actions that may cause significant changes in work organisation or the basis of employment.

In addition, at the request of the Employee Council, the employer consults the Council on matters specified in the Act. The Employee Council also has an intranet page for publishing information for the Bank's employees.

In 2025, 3 meetings were held with the Employee Council devoted to:

- work organisation in connection with implementing a new branch model;
- a meeting with representatives of the Retail and Private Banking Division.

The Employee Council's term ended on 21 February 2025. Elections for the next term will be held after the Bank receives a request from employees as required by law. To date, the Bank has not received such a request.

We attach importance to education and upskilling of the Bank's employees. The HR Projects and Organisational Modelling Office is responsible for organising training. We are aware that opportunities for professional development have a positive impact, on the one hand, on employees' sense of belonging to the organisation and, on the other hand, on the delivery of tasks necessary to achieve its objectives. Hence our diverse offering of educational programmes for Bank employees, which includes:

- local training and general development webinars;
- international training and programmes;
- mentoring and group/team coaching;
- individual internal and external coaching;
- certification training, e.g. CFA/ACCA/CIA.

As part of individual training, we organise workshops and courses in specialist banking knowledge delivered by both internal and external trainers and experts – including moderators, coaches and facilitators. Participation enables employees to develop the competencies necessary to perform their assigned duties effectively. We fully cover the cost of employee participation in individual training to which we refer employees, and we partially reimburse – or provide via granted training leave – training that employees undertake on their own initiative. At the same time, for individual training that results in additional qualifications, licences or international certificates in which we co-finance participation, we require a training agreement to be concluded between the Bank and the employee. The agreement sets out the parties' rights and obligations related to the employee's professional development and the conditions under which employees reimburse training costs.

The development of employee skills that we focus on also includes foreign language learning in the form of individual language courses financed fully or partially by the Bank. These courses are aimed primarily at managers and high-potential employees who use a foreign language in their day-to-day duties. We deliver this training in cooperation with language schools with which the Bank has framework agreements.

We support employees in upskilling by enabling them, on their own initiative, to undertake postgraduate studies and MBA programmes in fields useful for work at the Bank. This form of support is also available to persons performing a key function in the Bank as part of their individual career paths. Where necessary, we also provide opportunities to obtain additional qualifications or authorisations required by external regulations. We enable professional development outside Poland through individual training, subject to separate approval of the business trip (flight and accommodation bookings).

In 2025, we implemented several development initiatives under programmes and projects such as:

- providing access for all Bank employees and Group companies to the LinkedIn Learning platform and ensuring an offer of content;
- AI Ambassador Programme;
- M365 Ambassador Programme;
- Law Academy;
- ESG Academy;
- *MS Office Champions* (Mistrzynie i Mistrzowie MS Office);
- Executive MBA studies for managerial staff;
- *Kuźnia Zwinności* (Agility Forge);
- Banking Sales School;

- *Menedżerskie Shot'y* (Managerial Shots) – a development programme for managerial staff that builds management and leadership competencies. The programme was designed for managers who do not have time for all-day training and receive practical "knowledge in a nutshell" within 45 minutes. In spring 2025, the sixth edition of Managerial Shots was held, with a total of 1,100 managers participating. As part of this edition, we organised ten workshops on the following topics:

– Decisions under pressure – how to make good choices in a dynamic environment,

– Microcoaching – how to develop employees in everyday situations,

– The art of delegation – how to assign tasks and be confident they will be delivered,

– Motivation – how and with what to engage employees,

– From resistance to engagement – how to manage change effectively,

– Managerial authority – building a partnership-based relationship within a team,

– Different shades of mobbing and its consequences,

– A conversation with an employee who is not delivering tasks,

– Critical thinking,

– How to be a mentor to your team.

In 2025, a further three editions of the programme were delivered, comprising 36 workshops attended by approximately 3.5 thousand managers.

- *Development Snacks* – a series of short thematic workshops focused on a single area of personal and professional skills development, available to all Bank employees. In 2025, another edition of the programme was held, covering 10 workshops on, among other things, teamwork, building mental resilience and future skills.

- *Mission: Development* – a programme for employees in which participants, through hands-on work on real business challenges in cross-organisational teams, discover and develop their competences and potential. In 2025, we continued the programme as part of its second edition, with six project teams from different areas of the Bank taking part. Through this programme, we not only support individual development, but also strengthen a culture of cooperation, innovation and accountability for the organisation's development.

- *Team Talent DNA* – for the first time at the Bank, we launched a development programme based on the CliftonStrengths34 assessment, covering 20 teams and involving 302 tests. The programme is a process consisting of six team workshops and an individual development pathway for managers.

- *Manager at the Start* – we launched the first edition of a development programme designed to support newly appointed Bank managers in making an effective start in the leader role. It combines the provision of essential operational knowledge with the development of key managerial skills. The first pillar of the programme includes a series of short, recorded webinars on processes, regulations, recruitment and HR matters required for work in a managerial position. These materials help participants quickly navigate the formal and operational aspects of functioning within the organisation (available on the programme page). The second pillar is a cycle of workshops developing practical leadership competences. The workshop component starts with a joint online workshop, after which participants are assigned to one of two pathways. The "From Expert to Leader" pathway is intended for people taking up a managerial role for the first time. In turn, the "Leader in Our Organisation" pathway is aimed at experienced managers who are only just starting work at the Bank. The programme enables the conscious shaping of the leader role and a rapid adjustment to organisational realities. As a result, new managers can begin their work with greater confidence and effectiveness.

- Within the *Sugar Free* programme for women, in 2025 we delivered development and educational activities arising from the programme's strategic objectives. The thematic offering of the programme was continuously expanded and updated and included: development of professional, personal and parental competences delivered through training, workshops and webinars; development programmes (Aware Leader, Excelentni); and development initiatives aimed at promoting and educating on new technologies delivered through webinars, technical training and programmes such as "Closer to Technology" and "emPower Women". We also successfully delivered two initiatives to raise pro-health awareness among employees: Pink October (4,000 participants) and Blue November (2,200 participants). In addition, we continued the second edition of the Development Programme for Local Female Leaders, building leadership and project competences. Towards the end of the year, we launched the first edition of a mentoring programme, under which 32 mentoring pairs began working together. In total, more than 7,000 women took part in these activities.

The planning and delivery of development programmes is primarily handled by the Department of Development Management and Organisational Culture.

We also use training as a channel to provide our employees with knowledge on occupational health and safety (OHS). As part of induction training, newly hired employees receive general instruction from representatives of the OHS Service and role-specific instruction from their direct line manager. Refresher training, in turn, is delivered entirely via the e-learning platform, giving employees convenient and flexible access to knowledge resources. The training topics align with the issues indicated in the framework programme set out in the Regulation of the Minister of Economy and Labour on training in the field of occupational health and safety.

The Bank's OHS Service monitors compliance with occupational health and safety regulations and rules and continuously provides information on occupational hazards and methods of eliminating them. It also plays an important role in assessing occupational risk to ensure employees are effectively protected against hazards present in the work environment. We have a fully digitised occupational risk assessment process, with all stages carried out via a dedicated application.

We also build employee safety awareness through regular first-aid training sessions delivered by qualified paramedics. Preventive health examinations are carried out in cooperation with an occupational medicine physician, with a view to optimising the scope of such examinations.

To communicate the most important information, we use a dedicated intranet page where we publish applicable rules, instructions and guidelines. We also enable employees to report potential hazards to a dedicated OHS mailbox, unless they prefer to contact the Bank's OHS Service representatives directly.

Our organisation also has an OHS Committee comprising representatives of the Bank, including the physician providing preventive care to employees, representatives of the OHS Service and persons representing employees. The Committee meets regularly, i.e. once per quarter, to discuss current OHS issues and initiatives, including hazards subject to estimation in the occupational risk assessment. In addition, following proceedings carried out at the Bank to determine the circumstances and causes of workplace accidents, we implement recommendations aimed at improving occupational safety.

Moreover, within our organisational structure we also have resources dedicated to managing material impacts on our own employees within the HR Business Partners (HRBP) units. In 2025, the number of active positions amounted to 39 FTE (as of 31 December 2025). The role of HRBP units is to identify, analyse and assess risks related to actions undertaken towards employees, report them, and initiate measures to reduce or eliminate them.

One of the material negative impacts identified in the area of our own employees is uncertainty regarding job security linked to the increasing use of AI solutions in our organisation. The implementation of these solutions enables the digitisation of services and, consequently, streamlining of many banking operations. Actions taken in this area are based on automation and robotisation, leading, among other things, to the replacement of human resources with chatbots in customer service and creating a risk related to the closure of physical branches. This directly affects employment security for staff in bank branches, business and corporate centres and private banking outlets, and above all in call centre departments. This applies both to employees employed under employment contracts and to those engaged under civil law contracts. As these employees have specific skills related to direct customer service, the possibility of employing them in other, also increasingly automated, areas of banking, is limited.

To counteract the above impact, we draw on assumptions arising from our strategy of building an aspirational organisational culture, under which we invest in developing our employees' skills, with a strong emphasis on future skills. Key initiatives in this area delivered in 2025 and addressed to our employees include:

- implementation of the LinkedIn Learning platform – a comprehensive source of the latest knowledge focused on developing competences that are key to increasing effectiveness in an employee's current or next role. This solution is important for success in a modern working environment, as it enables employees to quickly reskill in line with the development of the sector, the company or a given department. Thanks to its broad base of experts and cooperating companies, LinkedIn Learning enables us to supplement knowledge regardless of role and scope of responsibilities. It also significantly supports the development of future skills: cognitive and technological competences, providing a comprehensive extension of the Bank's training ecosystem. It is fully tailored to the capabilities and resources of our employees, enabling them to improve their skills both during and outside working hours, using business and personal devices. This includes not only training agreed with the line manager (during working hours), but also training unrelated to an employee's duties (outside working hours). The most popular courses among the Bank's employees are courses in the AI area;
- #AI ambassador programme – a programme aimed at engaging employees in the adoption process and developing AI-related skills (with particular emphasis on the Copilot tool), knowledge sharing and building a community focused on developing competences in the use of AI, through wider rollout of an AI-based tool.

In 2025, we continued activities under the Copilot M365 pilot and the ambassador programme. We are currently in the tool adaptation phase and are running pilots to transform the way we work, with the goal of building a modern workplace environment. We also broadened employee participation in the implementation of the M365 Copilot tool by increasing the number of users.

To support Copilot adoption, AI Ambassadors operate within the Bank, with the following mission:

- explore – learning and testing the capabilities of #AI technology, with particular emphasis on the Copilot tool,
- promote – championing #AI within the Bank,
- communicate – acting as an information flow channel between the Copilot service implementation team and other employees,
- engage – encouraging colleagues to use the tool, break habits, experiment, and share knowledge.

In 2025, the Ambassadors group undertook additional training to update and supplement their Copilot knowledge resulting from integration of the tool with cloud solutions. We implement the project with the involvement of our external partners, with whose support we deploy, test and explore Copilot's capabilities.

As a result of these activities:

- a group of approximately 40 people acquired the skills necessary to serve as Copilot Ambassadors during the further implementation phase. Each Ambassador was required to complete training and pass a demanding exam.
- a team of approximately 120 people was formed, prepared to perform tasks as competent M365 Ambassadors. We required M365 Ambassador candidates to complete training and pass a demanding exam.
- over 4,300 employees have been trained in AI-enabled environments (M365) or AI tools.

In addition, we have launched mandatory AI training for all Bank employees.

A second material negative impact in the area of own employees concerns the gender pay gap. To reduce the gap, we carry out remedial actions in line with the Gender Equality and Diversity Policy, such as analysing and monitoring the pay structure. This enables us to verify the level of pay received by employees for work of equal value.

Minimising the pay gap is also one of the annual objectives for the management team. As part of monthly monitoring, managers receive information on changes in the pay gap (based on basic salaries) within the units they oversee.

In addition, during the Bank's annual salary review process, we take the pay gap into account. The salary review tool available to managers allows them to track how approved pay increases affect the pay gap (based on basic salaries)

As a result of the 2025 salary review process, the pay gap between women and men covered by the Company Collective Labour Agreement decreased by 0.6 percentage points, and by 0.8 percentage points at the level of the entire Bank. This indicator is calculated on a simplified basis, using basic salaries under employment contracts and excluding variable pay components.

The pay rise process is implemented based on an annual budget earmarked for this purpose for the population covered by *the Company Collective Labour Agreement.*

13.3.1.2 Metrics and targets

Targets for managing material negative impacts, increasing positive impacts, and managing material risks and opportunities [S1-5]

ESG is an integral part of the Strategy, under which we set targets for the next three years (by 2027), including maintaining high employee engagement (>60%), keeping pay differences in comparable positions below 5%, and achieving a 33% share of women in managerial roles. To assess progress toward the 2027 targets, we adopted 2024 baseline values: 63% employee engagement, 2.18% adjusted pay gap, and a 23% share of women in the most senior management positions.

The achievement of targets related to managing material impacts and strategic objectives is supported by Group-wide regulations, although not all of them apply directly. These regulations were introduced before the CSRD Directive came into force and, therefore, the description of these targets together with the measurement structure does not meet all reporting requirements. We monitor pay-gap-related indicators monthly, and these are available to unit heads. This supports managerial decisions on remuneration while promoting actions aimed at achieving pay equity between women and men in their units. As a result, the Bank's pay gap decreased from 30.99% (unadjusted) and 2.18% (adjusted) in 2024 to 28.50% (unadjusted) and 0.95% (adjusted) in 2025.

Target achievement was also reflected in the qualitative component of the individual annual objectives set for members of the Bank's management team, which include implementing the Strategy's assumptions, with particular focus on social matters such as reducing the pay gap, employee engagement, and volunteering activity.

The level of achievement of the adopted strategic targets, including targets related to managing IROs in the social area concerning own employees, is indicated by the results of the employee engagement and satisfaction survey and the year-on-year staff turnover rate (10.52% vs. 6.96% in 2024).

Characteristics of the undertaking's employees [S1-6]

The indicators presented below are material disclosures intended to provide a clearer understanding of our organisation. Where any indicator is disclosed voluntarily, this has been expressly noted next to that indicator.

In 2025, the level and structure of employment at the Bank were affected by:

- incorporation into the Bank's structures of companies from the Pekao Group: Pekao Direct (Contact Centre), Card Centre,
- implementation of the Voluntary Redundancy Programme.

Number of employees (end of the reporting period) by gender*:

		PEKAO GROUP			BANK		
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Persons	2024	10,110	5102	15,212	8,555	4,071	12,626
	2025	9,736	5,175	14,911	9,054	4,711	13,765
FTEs**	2024	10,043.61	5,057.50	15,101.11	8,541.42	4,060.25	12,601.67
	2025	9,694.64	5,144.50	14,839.14	9,017.98	4,688.75	13,706.73

* Within the Pekao Group, we do not collect employees' gender data directly. Gender information is determined indirectly – based on the first name and the PESEL number. Consequently, our reporting only presents a split into women and men.

** For the calculation, we include employees engaged under employment contracts as of 31 December 2025 (active and inactive), excluding employees with ≤0.1 FTE, expressed in FTEs.

Number of employees (FTEs) engaged under employment contracts (end of the reporting period), by contract term and gender:

		PEKAO GROUP			BANK		
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Fixed period	2024	1,334.31	930.65	2,264.96	885.05	546.78	1,431.83
	2025	1,179.25	883.05	2,062.30	1112.90	830.40	1,943.30
Indefinite period	2024	8,709.30	4,126.80	12,836.10	7,656.37	3,513.48	11,169.84
	2025	8,515.39	4,261.45	12,776.84	7,905.08	3,858.35	11,763.43
Total	2024	10,043.61	5,057.45	15,101.06	8,541.42	4,060.25	12,601.67
	2025	9,694.64	5144.50	14,839.14	9,017.98	4,688.75	13,706.73

Number of employees engaged under employment contracts (end of the reporting period), by working time and gender:

		PEKAO GROUP			BANK		
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Full-time	2024	9,772.00	4,914.00	14,686.00	8,507.00	4,037.00	12,544.00
	2025	9,559.00	5,071.00	14,630.00	8,900.00	4,630.00	13,530.00
Part-time	2024	271.61	143.50	415.11	34.42	23.25	57.67
	2025	135.64	73.50	209.14	117.98	58.75	176.73
Total	2024	10,043.61	5,057.50	15,101.11	8,541.42	4,060.25	12,601.67
	2025	9,694.64	5,144.50	14,839.14	9,017.98	4,688.75	13,706.73

Number of employees with no guaranteed hours (end of the reporting period):

	PEKAO GROUP			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
2024	0	0	0	0	0	0
2025	0	0	0	0	0	0

Staff turnover:

		PEKAO GROUP	BANK
Pekao Group Bank Total number of employees who left the entity during the reporting period	2024	1,497.61	877.58
	2025	1,562.25	1,441.70
Total number of employees who left the entity during the reporting period*	2024	9.92%	6.96%
	2025	10.53%	10.52%

* To calculate the employee turnover rate, we determine the total number of individuals who left the organisation voluntarily, as a result of termination by the employer, retirement, or death during employment. This value is the numerator in the turnover rate calculation. The denominator is the total number of employees, determined at the end of the reporting period.

Profile of non-employee workers who form part of the entity's own workforce [S1-7]

Number of contractors (end of the reporting period), by contract type and gender:

		PEKAO GROUP			BANK		
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Engaged under contracts with entities carrying out “employment activities” *	2024	16	7	23	0	0	0
	2025	19	1	20	0	0	0
Self-employed **	2024	40	86	126	0	0	0
	2025	48	105	153	0	0	0
Contract for specific work	2024	68	40	108	7	7	14
	2025	55	71	126	3	9	12
Total	2024	124	133	257	7	7	14
	2025	122	177	299	3	9	12

* Employment agencies.

** Self-employed are cooperators (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 (end of the reporting period):

DATA ON TRADE UNIONS AND SOCIAL DIALOGUE AT BANK PEKAO*	2024	2025
Number of trade unions operating within Bank Pekao	9	9
Number of members of the Bank Pekao Employee Council**	7	7
Percentage of employees covered by collective agreements	77%	79%
Number of workdays lost due to strikes	0	0
Percentage of employees represented by employee representatives	100%	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.

** The Bank Pekao Works Council ended its term on 21 February 2025; no new Council has been established.

Scope of collective bargaining and social dialogue for 2025:

COVERAGE RATE	COLLECTIVE BARGAINING COVERAGE		SOCIAL DIALOGUE
	EMPLOYEES – EEA (IN COUNTRIES WHERE THE ENTITY HAS >50 EMPLOYEES ACCOUNTING FOR >10% OF TOTAL EMPLOYEES)	EMPLOYEES – OUTSIDE THE EEA (ESTIMATE FOR REGIONS WHERE THE ENTITY HAS >50 EMPLOYEES ACCOUNTING FOR >10% OF TOTAL EMPLOYEES)	WORKPLACE REPRESENTATION (EEA ONLY) IN COUNTRIES WHERE THE ENTITY HAS >50 EMPLOYEES ACCOUNTING FOR >10% OF TOTAL EMPLOYEES
0-19%	-	-	-
20–39%	-	-	-
40–59%	-	-	-
60–79%	Poland	-	Poland
80–100%	-	-	-

Diversity metrics [S1-9]

Number of employees by employment structure and diversity (FTEs, end of the reporting period):

TOP SENIOR MANAGEMENT*	PEKAO GROUP			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
2024**	49.00	89.50	138.50	12.00	42.50	54.50
2025	47.95	78.70	126.65	15.00	40.50	55.50

* Top senior management includes members of the Bank's Management Board and Directors of Divisions, Centres and Departments reporting directly to the Management Board.

** Insignificant data correction of 2024 data – update of the number of top senior management at Bank Pekao S.A. due to inclusion of Management Board members.

Share of employees by employment structure and diversity (end of the reporting period):

TOP SENIOR MANAGEMENT*	PEKAO GROUP		BANK	
	WOMEN	MEN	WOMEN	MEN
2024**	35.38%	64.62%	22.02%	77.98%
2025	37.86%	62.14%	27.03%	72.97%

* Top senior management includes members of the Bank's Management Board and Directors of Divisions, Centres and Departments reporting directly to the Management Board.

** Insignificant data correction of 2024 data – update of the number of top senior management at Bank Pekao S.A. due to inclusion of Management Board members.

Number of employees by age category and diversity (FTEs, end of the reporting period):

		PEKAO GROUP			BANK		
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
<30	2024	857.38	735.23	1,592.61	430.65	360.83	791.48
	2025	794.78	736.25	1,531.03	732.28	679.30	1,411.58
30-50	2024	5,250.42	2,954.63	8,205.05	4,381.47	2,475.93	6,857.39
	2025	5,064.43	2,967.03	8,031.46	4,604.26	2,688.78	7,293.03
>50	2024	3,935.81	1,367.65	5,303.46	3,729.30	1,223.50	4,952.80
	2025	3,835.43	1,441.23	5,276.66	3,681.45	1,320.68	5,002.13
Total	2024	10,043.61	5,057.50	15,101.11	8,541.42	4,060.25	1 2601.67
	2025	9,694.64	5,144.50	14,839.14	9,017.98	4,688.75	13,706.73

Adequate pay [S1-10]

Number of employees receiving pay below the adequate pay benchmark* (end of the reporting period):

	PEKAO GROUP		BANK	
	2024	2025	2024	2025
Number of employees	0	0	0	0
Percentage of employees	0	0	0	0

* The adequate pay benchmark adopted is the statutory minimum wage ("national minimum wage") applicable in 2024 and 2025, respectively.

Social protection [S1-11]

Under the applicable regulations, all employees engaged under employment contracts are covered by the full scope of social insurance, including old-age pension, disability pension, accident, sickness and health insurance. This ensures access to social protection in circumstances preventing work, such as illness, a workplace accident, disability, taking parenthood-related leave, or retirement. One hundred percent of employees are eligible to benefit from these protections.

Training and skills development metrics [S1-13]

Number of performance and career development reviews (FTEs, end of the reporting period):

		PEKAO GROUP			BANK		
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Number of employees who participated in regular performance and career development reviews	2024	8,709.43	4,378.68	13,088.10	7,557.62	3,567.28	11,124.89
	2025	7,604.95	3,908.10	14,839.14	7,274.99	3,654.60	10,929.59
Number of employees who participated in regular performance and career development reviews	2024	86.72%	86.58%	86.67%	88.48%	87.86%	88.28%
	2025	78.44%	75.97%	77.59%	80.67%	77.94%	79.74%

Training hours by gender (end of the reporting period):

		PEKAO GROUP			BANK		
		WOMEN	MEN	ALL EMPLOYEES	WOMEN	MEN	ALL EMPLOYEES
Total number of training hours, by gender	2024	531,845.99	199,423.22	731,269.21	459,429.99	143,583.22	603,013.21
	2025	467,095.45	187,606.04	654,701.49	460,618.15	182,100.44	642,718.59
Average training hours per employee, by gender	2024	52.28	38.27	47.54	53.78	35.34	47.84
	2025	47.53	35.06	43.14	51.06	38.69	46.82

Average training hours per employee by employee category (end of the reporting period):

	PEKAO GROUP		BANK	
	2024	2025	2024	2025
Management Board Members	37.36	25.28	24.11	39.92
Managers	49.63	53.30	53.44	59.71
Other employees	47.70	41.87	47.05	45.24
All employees	47.54	43.14	47.84	46.82

Occupational health and safety metrics [S1-14]

Percentage of own workforce covered by the OHS system (end of the reporting period):

		PEKAO GROUP	BANK
Percentage of workforce covered by OHS systems	2024	100%	100%
	2025	100%	100%

Number of occupational accidents (end of the reporting period):

	PEKAO GROUP		BANK	
	2024	2025	2024	2025
Number of occupational accidents	38	34	38	33
Occupational accident rate	1.55	1.46	1.86	1.54
Number of cases of ill health	0	0	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	1,922	1,596	1,905

Number of fatal occupational accidents (end of the reporting period):

	PEKAO GROUP		BANK	
	2024	2025	2024	2025
Total number of fatal occupational accidents resulting from:				
• work-related injuries	0	0	0	0
• work-related ill health (occupational disease)	0	0	0	0
• total number of fatal accidents	0	0	0	0

Work–life balance metrics [S1-15]

Percentage of employees entitled to parental leave and percentage of entitled employees who took parental leave (end of the reporting period):

		PEKAO GROUP			BANK		
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Percentage of the undertaking's own workforce entitled to parental leave	2024			100%			100%
	2025			100%			100%
Percentage of the undertaking's own workforce who took parental leave	2024	3.59%	3.68%	3.62%	3.10%	3.52%	3.24%
	2025	2.75%	2.97%	2.83%	2.59%	3.07%	2.76%

Pay metrics (gender pay gap and total remuneration) [S1-16]

Pay-related indicators:

	2024	2025	BANK PEKAO TARGET FOR 2027
Gender pay gap* between women and men – Pekao Group	29.20%	28.57%	
Gender pay gap between women and men – Pekao Group	30.99%	28.50%	
Pay difference in Pekao Group S.A.**		2.05%	<5%
% of top senior management positions held by women***		29%	33%

* The unadjusted gender pay gap between women and men is presented as the difference between men's average pay and women's average pay, expressed as a percentage of men's average pay, based on headcount as of 31 December 2025. The indicator was calculated in accordance with the Polish Bank Association's (Związek Banków Polskich) recommendations for reporting differences in pay between women and men, including the exclusions from the population and the pay components taken into account. The indicator is calculated on the basis of total pay (annualised and converted to a full-time equivalent), understood as: twelve times the base salary rate for December, additional cash benefits paid in a given year, additional non-cash benefits actually received at their taxable benefit value, bonuses, awards and competitions paid in a given year, and variable remuneration for senior management awarded in 2025 for 2024. Pay does not include: overtime pay and overtime premiums, benefits financed from the Company Social Benefits Fund (ZFŚS), reimbursements of expenses and the value of work tools provided, payments related to an employee's departure (e.g. severance pay, cash equivalent for unused leave, compensation, non-compete payments, etc.), or employer social security contributions. The Bank also calculates an adjusted gender pay gap indicator, calculated as follows: for Bank Pekao S.A. – a weighted average for employee sub-groups, taking into account grading levels, job families and the division in which a given employee is employed; for Group companies – a weighted average for employee sub-groups, taking into account job category. This indicator is also calculated based on total pay. The adjusted gender pay gap calculated in this way for 2025 amounts to 0.95% for the Bank and 2.05% for the Group. To ensure comparability, 2024 data were recalculated using the current methodology.

** As of 31 December 2025 – indicator for the Pekao Group. The adjusted gender pay gap is calculated as a weighted average for employee sub-groups, taking into account: for the Bank – grading levels, job families and the division in which a given employee is employed; for Group companies – employee sub-groups. The indicator is calculated based on total pay. The Bank uses the Korn Ferry/Hay methodology (levels and job families), under which it compares pay differences.

***As of 31 December 2025 – indicator for Bank Pekao S.A.; senior management (top management) excluding Management Board Members.

Pay ratio for the highest-paid individual:

	PEKAO GROUP		BANK	
	2024	2025	2024	2025
Ratio of annual total remuneration for the highest-paid individual in the organisation to the median annual total remuneration for all employees (excluding the highest-paid individual)*	19,3	19.4	18.5	19.2

* In 2025, following the issuance of the Polish Bank Association's recommendations on calculating the gender pay gap, the Bank also adjusted the methodology for calculating the remuneration indicator for the highest-paid individual. The indicator is calculated on the basis of total pay (annualised and converted to a full-time equivalent), understood as: base salary paid, sick pay, additional cash benefits paid in a given year, additional non-cash benefits actually received at their taxable benefit value, bonuses, awards and competitions paid in a given year, and variable remuneration for senior management paid. Pay does not include: overtime pay and overtime premiums, benefits financed from the Company Social Benefits Fund (ZFŚS), reimbursements of expenses and the value of work tools provided, payments related to an employee's departure (e.g. severance pay, cash equivalent for unused leave, compensation, non-compete payments, etc.), or employer social security contributions. To ensure comparability, 2024 data were recalculated using the current methodology.

Incidents, complaints and severe human rights impacts [S1-17]

Incidents, complaints and severe human rights impacts (end of the reporting period):

	PEKAO GROUP		BANK	
	2024	2025	2024	2025
Number of cases of discrimination, including harassment	0	1	0	1
Number of complaints submitted through reporting channels	21	24	20	23
Total fines, penalties, and damages resulting from incidents exceeding	30,000	0	0	0
Number of human rights violations	0	0	0	0
Including violations of the UN Guiding Principles on Business and Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, or OECD Guidelines	0	0	0	0
Total fines, penalties, and damages resulting from incidents exceeding	0	0	0	0

13.3.2 Consumers and end-users [ESRS S4]

Customers[38] are the foundation of our business. We build all processes, products and our communication around their needs, expectations and experiences. Our objective is to develop lasting, trust-based relationships that translate into customer satisfaction and financial security.

Our day-to-day cooperation with customers is grounded in respect, professionalism and empathy. We ensure that everyone – regardless of age or life circumstances – is treated fairly and with understanding.

We offer products in a responsible and transparent manner. We counteract misselling by tailoring our offering to customers' genuine needs. We create solutions that support their financial stability and provide a sense of security.

We treat customer security as a paramount value. We continuously develop tools and procedures to protect personal data and financial assets. We adhere to the highest privacy standards, and our communication with consumers is based on honesty, reliability and responsibility. We avoid messages that could mislead, focusing instead on clear and understandable information.

We build customer relationships on the values that underpin our success: PROSTO (STRAIGHTFORWARDLY), RAZEM (TOGETHER), ODWAŻNIE (BOLDLY), ODPOWIEDZIALNIE (RESPONSIBLY), Z DETERMINACJĄ (WITH DETERMINATION), OTWARCIE (OPENLY) and UCZCIWIE (HONESTLY).

13.3.2.1 Managing impacts, risks and opportunities

Policies related to consumers and end-users [S4-1]

Our relationships with customers are the result of deliberate choices, responsible practices and continuous improvement. To better understand which aspects of our operations shape consumer experience, we took a holistic look at our processes and customer interactions. Our aim was not only to assess benefits, but also to identify potential risks and areas requiring particular attention.

As a result of the double materiality assessment, we identified five areas that are critical to the quality of customer relationships:

- Non-discrimination – ensuring equal treatment of all customers,
- Access to products – removing barriers to using our offering,
- Access to information – transparency and clarity of communication,
- Consumer privacy and personal data protection – responsible management of information and data,

[38] Under ESRS S4, we refer to customers and consumers as retail banking, private banking and sole proprietorships (JDG).

- Responsible marketing practices – honesty and transparency in marketing messages.

Understanding the importance of these areas helps us design our activities more effectively, tailor our offering to customers' real needs and build lasting, trust-based relationships.

Non-discrimination and access to products and services

The cornerstone of our day-to-day operations and of our values and standards is *the Pekao Group Code of Conduct* (*the Code of Conduct*), which ensures process transparency and alignment with best practices. We base all actions – internal and external – on *the Code*, carrying them out in line with ethical and professional standards.

The Code of Conduct sets out the principles we follow in our daily business activities. It is also our commitment to act in line with the highest standards in relations with colleagues, partners and customers. The provisions of *the Code* form the basis for other regulations and activities discussed in the following sections of the report. *The Code* itself is described in more detail in section **[G1-1]**.

The Bank has a structured product lifecycle management process for customer products, covering their launch, modification and withdrawal from the offering. Its purpose is to establish a consistent framework to be met by all new and updated products, including insurance products. This process is governed by *the Policy for the Process of Launching New Products at Bank Pekao S.A. (the New Product Launch Process Policy)*, which sets out the rules of conduct and risk areas related to bringing products to market. By applying a uniform approach, we can ensure high quality standards, compliance with applicable legal and internal regulations, and alignment with *the Strategy*.

Each new product and each modification require Management Board approval, and multiple organisational units are involved in the process. Under *the New Product Launch Process Policy*, the unit launching or modifying a product analyses it and ensures that it:

- is aligned with *the Strategy*, including the ESG strategy and principles;
- has a positive impact on customer experience (as determined based on customer experience impact assessment and research conducted on target customer groups);
- meets internal financial, capital, profitability and accounting criteria;
- has been assessed in terms of risks, including legal, compliance and reputational risk, operational risk (including complaint handling), credit risk, financial risk, and the risk of breaches of AML/CFT regulations and financial sanctions;
- is handled in systems that ensure data and information security and have appropriate business continuity mechanisms;
- is appropriately classified for FATCA and CRS purposes.

In accordance with European Banking Authority (EBA) guidelines, prior to:

- launching a new product on the market,
- offering an existing product to a new target market,
- modifying an existing product,

the implementing unit is required to carry out product testing. We perform such tests under various scenarios, including stress conditions, which allows us to assess product impact on customers and identify potential weaknesses in the offering. Test results are an important source of information for supervisory authorities and support efforts to protect consumers' interests.

As part of our marketing activities, we systematically measure the quality of customer experience and customer needs, conducting research as early as the product and service design stage. This helps us better understand customer expectations and develop solutions that are attractive and easy to understand.

In designing banking products, we focus on accessibility and transparency. Customer experience in working with the Bank matters to us. That's why we understand ESG as active customer experience management: we listen, analyse and respond to build relationships based on trust and real needs.

Customer experience management is a strategic approach to building and improving every interaction a customer has with the brand; therefore, in 2024, we implemented the *Customer Experience Management Model* (*the Model*). Its objective is to increase customer satisfaction and loyalty by delivering consistent and positive experience. *The Model* is based on data analysis, journey mapping and continuous process improvement based on customer feedback and needs.

The Model operates through individual modules:

- Customer experience strategy – sets the direction for our development towards becoming the market leader in customer satisfaction and loyalty in banking. How customers perceive us changes with their experiences arising from their relationship with us, which is why we regularly collect customer feedback to adjust our actions both in the short and long term to their changing expectations.

- Measuring customer experience – provides employees with information needed to make the right business decisions and identify areas requiring improvement.
- Improving customer experience – based on a model that defines the roles and responsibilities of individual Bank units in planning, monitoring and optimising processes and solutions. It involves identifying and eliminating so-called "pain points" along customer journeys. This enables better processes, products and services and helps create exceptional experiences. As a result, we increase customer satisfaction and loyalty and support the creation of competitive advantage.
- Customer-centric culture – is the foundation of *the Model* and an integral part of our *Strategy*. It focuses on building an organisational culture in which the customer is at the centre of everything we do. We aim for a lasting shift in mindset and behaviour, so that every decision is made from the perspective of value delivered to the customer.

We aspire to be a modern, dynamic bank focused on meeting customers' needs at every stage of their lives. It is very important to us that contact with the Bank is a positive experience across all touchpoints. This means professional advice, simple procedures and fast decisions, as well as a complete and flexible range of products for all customer segments. At the same time, we pay particular attention to the quality of communication and the creation of customer-friendly, readable documentation, on the assumption that positive customer experience depends on all of us. It is customer experience that builds and strengthens the Bank's brand.

To improve the accessibility of our services, in September 2024, we launched *the Pekao without Barriers* project, which prepares our organisation for the requirements of *the Act of 26 April 2024 on ensuring that certain products and services meet accessibility requirements by economic operators*, which have applied to us since 28 June 2025.

The project aims to:

- provide the highest quality customer service, regardless of the point of contact with the Bank – taking specific needs into account;
- remove barriers to access to banking services;
- increase the accessibility of services offered;
- raise awareness and train employees on accessibility solutions tailored to people with specific needs.

The Project covers people with specific needs who, for various reasons, must take additional actions or use special solutions to overcome barriers and participate in different areas of life on an equal basis with others. This includes, among others, persons with disabilities, seniors, pregnant women and people travelling with small children.

When designing a branch, we ensure that it:

- is equipped with all necessary facilities for persons with disabilities, including call/assistance system;
- provides unobstructed access to all rooms – without thresholds, steps or other obstacles;
- has door and corridor widths compliant with applicable regulations;
- has entrances that are easily accessible – where access requires climbing stairs, we ensure that a ramp, lift or other mechanism facilitating movement is provided.

The unit coordinating project delivery is the Key Quality Projects Section within the Customer Experience Management Department.

In the area of human rights compliance, we are guided both by applicable laws and by best market practices. In the Pekao Group, all reports, including those concerning human rights violations, are carefully analysed and handled in accordance with applicable procedures. Due to the nature of such incidents, we do not quantify them or estimate their level of materiality. Detailed information is available in section [S1-1].

Marketing communications and responsible marketing practices

We believe that every piece of information addressed to customers can shape their decisions. Responsible promotion is therefore an essential part of building trust. Every marketing message, every advertising campaign and every product communication must not only capture attention, but above all provide reliable and honest information, with full respect for the customer's decisions.

In the Pekao Group, we carry out promotional activities based on transparent knowledge of the products we offer, taking into account potential risks arising from changing macroeconomic conditions or regulatory action. Our communications comply with applicable laws, supervisory authority guidance, the principles of fair dealing in the financial market and good practice – and we respect customers' preferences regarding the receipt of marketing content.

The framework for these activities is provided by *the Marketing Policy of Bank Pekao S.A.* (*the Marketing Policy*), which stems from, and further elaborates on, *the Marketing Strategy*. The document was introduced to structure all areas of marketing activity in the Bank and to implement organisational solutions that enable marketing processes to be improved and optimised. It covers particularly areas such as brand/image communications, content marketing, digital marketing, media planning and buying, event organisation, marketing research and internal communications.

The standards for marketing communications are set by *the Rules for Creating Marketing Communications of Bank Polska Kasa Opieki Spółka Akcyjna* (*the Rules for Creating Marketing Communications*), which define the overarching principles for ensuring that messages are compliant with legal regulations, the Bank's internal guidelines, recommendations of industry organisations of which the Bank is a member, and the values that define our identity. It should be noted that, for the Pekao Group, a document entitled *the Policy for Cooperation in the Area of Communication and Marketing within the Capital Group of Bank Polska Kasa Opieki Spółka Akcyjna. Policy for Managing the Brand Architecture of the Capital Group of Bank Polska Kasa Opieki Spółka Akcyjna* has been developed. This document serves an analogous purpose to the document described above; however, its provisions apply across the entire Group, ensuring consistency and a uniform approach throughout the organisational structure.

Marketing communications in the Pekao Group are addressed to all audience groups, regardless of age, gender or origin. Every message is created with full respect for diversity and the dignity of the customer. Discrimination – in any form – is unacceptable and has no place in our activities.

Our *Rules for Creating Marketing Communications* clearly state that no product or service may be presented as entirely risk-free, nor in a way that would suggest a lower interest rate than it actually is. As an institution whose credibility is built on transparency and honesty, we are committed to providing accurate information on the terms of the services we offer. We precisely define the information that must be included in marketing materials, and the form and content are tailored to the needs and capabilities of the audience.

To ensure compliance with applicable regulations and internal standards, all advertising materials are subject to consultation with the Compliance Department, and the assessment of non-compliance risk is an integral part of the communications development process.

With regard to investment products, in line with *the Rules for Creating Marketing Communications*, any information provided by the Bank to customers – including information disseminated for advertising or promotional purposes – must be presented in a reliable manner and clearly highlight the risks associated with the investment and the possibility of losing part of the invested funds. Risk information is presented in a font size at least equal to the font size used to communicate any potential benefits of the product; additionally, the layout used ensures that such information is clearly visible. These materials are addressed exclusively to customers who, on the basis of the MiFID questionnaire completed by them, fall within the target market for the relevant investment product, in order to minimise the risk of presenting a product that is not appropriate to the customer's knowledge and expectations.

Consumer privacy (and personal data protection)

We know that customer trust is a value built over many years, and one of its pillars is a responsible approach to personal data protection. In a world where digital interaction with financial institutions is becoming everyday practice, privacy management is no longer merely a regulatory obligation, but a strategic commitment to customers.

At the Bank, we have embedded personal data protection into operational and regulatory structures as a permanent element of organisational culture. Every process and decision – from service design through to day-to-day operation of the Bank – takes into account information security principles and respect for privacy. We have clearly defined accountability for this area: from the Management Board, through unit directors, to every employee who processes data as part of their job responsibilities.

Our comprehensive approach to security management (including cybersecurity) is set out in the *ICT Security Strategy for 2025–2027* (*the Security Strategy*), which focuses on strengthening the organisation's resilience to digital threats and ensuring the highest level of customer data protection. *The Security Strategy* assumes the development of competencies relating to modern technologies and the implementation of solutions supporting the secure operation of banking services. The document plans actions in areas such as:

- Artificial intelligence and machine learning (AI/ML) – implementing security mechanisms and risk assessment principles for new technologies.
- Cloud services security – developing competencies and implementing technical and organisational solutions in this area.
- Identity and access management (IAM) – implementing systems supporting the control of permissions and access.

- Compliance with ISO standards – preparation for certification and ongoing improvement of the information security management system.
- Education and communication – activities increasing awareness among employees and customers, including ambassador programmes and information campaigns.

On the technology side, we are implementing new mechanisms to support the secure use of digital solutions. We carry out risk analysis and develop risk assessment principles that will be applied in implementation processes. We carry out these activities in a coordinated manner, taking organisational and operational needs into account.

The Security Strategy also covers the development of policies and procedures related to access management and information security, as well as preparations for implementing standards aligned with international norms. We monitor and continuously improve the solutions implemented, and we assess their effectiveness based on periodic reviews and internal reports.

As part of *the Security Strategy*, we run an educational programme for employees aimed at increasing cybersecurity awareness. In parallel, we carry out informational and educational activities for customers, including media campaigns and initiatives designed to increase knowledge about threats and how to avoid them.

The Security Strategy in force at the Bank is universal in nature and applies to all customers. The document takes into account commitments relating to respect for human rights and compliance with international guidelines on responsible business conduct. The implementation of *the Security Strategy* is carried out in line with the adopted principles of oversight and accountability.

Implementation of *the Security Strategy* is monitored on an ongoing basis using a management information system, including periodic reports on the security status of the ICT environment. In addition, reviews of information security documents and compliance audits will be conducted against applicable regulations, including the national cybersecurity system. The results will be reported to the relevant supervisory authorities and committees, enabling progress to be tracked on an ongoing basis and improvement actions to be taken. Further information on the customer data management process is provided in section **[S4-2]**.

Minimum reporting requirements for policies:

POLICY NAME	LINK TO IRO	APPROVING BODY	SCOPE (BANK/GROUP)
Pekao Group Code of Conduct	Non-discrimination	Management Board of the Bank	Group
Policy for the Process of Launching New Products at Bank Pekao S.A.	Access to products Access to information	Supervisory Board	Bank
Bank Pekao Strategy for 2025–2027	Access to products	Supervisory Board	Group
Customer Experience Management Model	Non-discrimination Access to products Access to information	Division Director	Bank
Rules for Creating Marketing Communications of Bank Polska Kasa Opieki Spółka Akcyjna	Responsible marketing practices Access to information Non-discrimination	Management Board of the Bank	Bank
Policy for Cooperation in the Area of Communication and Marketing within the Capital Group of Bank Polska Kasa Opieki Spółka Akcyjna. Policy for Managing the Brand Architecture of the Capital Group of Bank Polska Kasa Opieki Spółka Akcyjna	Responsible marketing practices Access to information Non-discrimination	Management Board of the Bank	Group
Marketing Policy of Bank Pekao S.A.	Responsible marketing practices	Management Board of the Bank	Bank
ICT Security Strategy 2025-2027	Consumer Privacy	Management Board of the Bank	Bank

Processes for engaging with consumers and end-users on impacts [S4-2]

We strive to build lasting relationships with customers based on trust, understanding their needs and co-creating value. Our activities in this area focus on ensuring responsible sales, developing innovative solutions, conducting systematic marketing and customer satisfaction research, and protecting customer privacy.

Customer research and customer experience management

We conduct research aimed at obtaining and updating knowledge about our customers' experiences. At the preparation stage, we define the scope of the research and the target group and then refine the methodology by selecting appropriate research tools. Data analysis is based on insights derived from the research projects carried out.

We monitor customer experience comprehensively across all business segments. We make research results available within the Bank via a reporting tool, enabling broad use in decision-making processes and in improving service quality.

Each year, we prepare a research plan covering all business segments and key channels through which customers contact the Bank. As part of efforts to better understand customer needs and improve services, we carry out a variety of research activities with consumers to gather feedback and jointly shape solutions that respond to real expectations. These include, among others:

- external relationship research – satisfaction with the relationship compared with competitors,
- internal relationship research – satisfaction of the Bank's customers,
- transactional research – satisfaction after a specific interaction or after using a selected channel,
- mystery shopper research – service quality audits in branches and remote channels,
- in-depth interviews and focus groups with customers and employees.

We conduct research at different intervals – annual, semi-annual and quarterly. We also analyse NPS benchmark results among retail customers, covering the largest banks in Poland.

Based on our analyses, we:

- compare the Bank's results with competitors (where available),
- identify competitive advantages,
- identify recurring patterns of satisfaction and dissatisfaction,
- pinpoint customer pain points, including along customer journeys,
- assess the impact of implemented improvements on the Bank's results,
- develop analyses and initial recommendations for change,
- monitor the effectiveness of implemented improvements in subsequent research waves.

On this basis, we run strategic initiatives affecting the quality of customer contact in areas such as brand perception, costs, offering and credibility, bank branches, mobile and online services and the helpline. We regularly map customer journeys to view processes from the customer perspective and eliminate pain points. Our goal is for every interaction with the Bank to be built on trust and effective cooperation.

The foundation for systematic improvement of customer interactions at every stage of contact with the Bank is the Customer Experience Management Model.

The Bank has established a unit whose mission is to support initiatives that increase customer satisfaction and improve relationship quality i.a. in the areas of processes, complaints, research, operational KPIs and operational activities. As a customer-oriented organisation, we engage all employees – from operational teams through to the Management Board – in creating positive interactions. We design processes so that purchasing products and using services is seamless and aligned with customer expectations, ensuring high-quality contact at every stage.

MiFID process

Customer experience management is also reflected in regulatory processes such as MiFID, where precise matching of products to customer needs and transparent communication are key elements in building trust.

The MiFID-enabled sales process begins with the customer completing an investment questionnaire. During this process, the customer answers questions about investment preferences, needs, risk appetite and expectations relating to ESG aspects. Based on this information, it is possible to determine which products fall within the customer's target market and which do not.

The customer may choose the one that best matches their purchasing preferences from the products aligned with the customer profile. It is also possible to purchase a product outside the target market; however, in such a case the customer receives an appropriate warning from the Bank. This mechanism is intended to prevent unsuitable product matching and to ensure that the offering is aligned with the customer's genuine needs.

Operational coordination of MiFID-related processes is handled primarily by employees of the Business Process Team within the Brokerage House and the Investment Process Support Office within the Bank. Oversight of the overall delivery of MiFID processes is exercised by the Management Board. These processes are reviewed annually and, in the event of regulatory changes, updated on an ongoing basis. The MiFID questionnaire itself should be updated by the customer no less frequently than once every 12 months, which helps maintain alignment between the offering and the customer's investment profile.

To ensure the process operates correctly, the MiFID area within the Brokerage House is governed by internal documents, the most important of which are:

- the appropriateness assessment of financial instruments and brokerage services, the suitability assessment for investment advisory services, and the assessment of the customer's preferences, needs and approach to investing (the MiFID Assessment);
- information pack, Information on retail savings Treasury bonds;
- rules for the distribution of investment products in the Centre – Pekao Brokerage House;

procedures for Customer Service Points and Brokerage Service Points in the area of identification, customer service standards, preparing meeting notes, telephone instructions, performing control activities and granting authorisations by customers.

Innovation development

We develop innovation in a systematic way, grounded in real business needs. The Bank operates an Innovation Lab, which serves as a research space responding to challenges raised by business owners. Research may be carried out independently or form an integral part of a broader design process delivered by the Lab Team's designers and, importantly, it is conducted at different stages of product or service development.

At the initial stage of building a solution, we conduct exploratory research, such as identifying customer needs, netnographic analysis, desk research, trendwatching studies and market benchmarking. At later stages, we continue the research process by validating initial concepts and development directions for existing products or services. Our work typically culminates in a report containing findings and recommendations, which we provide to the business owner as support for further decision-making.

In 2025, we carried out a range of studies aimed at deepening our understanding of consumer needs and experiences, as well as supporting design processes relating to the development of products and services. These studies took into account diverse customer perspectives, including those of people with specific needs, such as seniors or people who do not use banking applications. We conducted:

- Exploratory research – focused on gaining a multi-dimensional understanding of customers' behaviours, expectations and pain points. It helped uncover new, previously unidentified insights, supporting better alignment of the Bank's offering with users' real needs. The research involved diverse customer groups, including people with limited access to digital technologies.
- User experience (UX) research – aimed at analysing customer interactions with banking products and services, with particular focus on Pekao24 online banking and the PeoPay mobile application. It enabled us to identify areas requiring optimisation in terms of usability and accessibility.
- Supporting research – conducted at different stages of the design process, providing project teams with key information needed to create and improve solutions. This included, among other things, identifying requirements, testing concepts and prototypes, and assessing the effectiveness of implemented services.

We ensure that business activities are conducted in compliance with applicable laws, external regulations and internal rules. We treat adherence to these standards as an integral part of our responsibility. We want employees to feel co-responsible for the proper functioning of the Bank, to act in line with applicable procedures and to contribute to increasing customer satisfaction.

In 2025, we took measures to improve the quality of telephone conversations with customers, with particular emphasis on security, clarity and tailoring the offering to recipients' needs. We monitor and ensure that, during telephone contacts, our employees:

- comply with security and conversation confidentiality standards, correctly identify customers, and observe the rules on maintaining banking and professional secrecy;

- provide information in a way that is accessible to the average recipient – reliably, comprehensively, truthfully and without misleading;
- offer products that are appropriate to the customer's needs, presenting them in a way aligned with their nature.

We treat call security as a priority – we want every customer to feel safe and comfortable during telephone contact. In 2025, we implemented, for customers who are sole traders (JDG), a safeguard in the form of an electronic business card, which we actively promoted among customers and employees. In addition, the "Send notification / customer assistance" function, available in the Bank's mobile applications, enables:

- confirmation of the employee's identity where the customer has doubts about the authenticity of the call;
- identification and confirmation of the customer's identity.

This functionality significantly increased customer protection against spoofing attacks, which involve impersonating a Bank employee and persuading customers to take actions consistent with a fraud scenario.

Consumer privacy and data management

We comply with GDPR requirements, ensuring customers' right to full information on the rules, purposes and methods of personal data processing – there are various information clauses in place at the Bank, tailored to the specific recipient groups.

In the Data Protection Officer Department (hereinafter: "DPOD"), we pay particular attention to clauses addressed to children – a group with specific needs and an elevated risk of discrimination. For products dedicated to children, such as the "money box" function, clauses written in simple, understandable language are used. In addition, any marketing consents on behalf of children must be given by their legal representatives.

The DPOD provides opinions on all initiatives involving the use of natural persons' personal data. These activities are intended to ensure regulatory compliance, protect customers' rights and build trust in the Bank as a socially responsible institution.

In an era of digitalisation and growing cybersecurity threats, privacy protection is not only a legal requirement arising from applicable regulations, but also a key element in building the institution's reputation and trust.

Every Bank employee is obliged to maintain the confidentiality of legally protected information relating to the Bank, Pekao Group entities, customers, transactions, counterparties and co-workers, which has been made available to them or to which they have gained access in the performance of their job duties.

We comply with generally applicable laws and the principles set out in 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, and repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter: GDPR).

We process personal data in accordance with the law and with the utmost care to protect the interests of data subjects. The Bank acts both as a data controller and as a processor within the meaning of GDPR and bears full responsibility for compliance with personal data protection regulations, in particular taking into account the GDPR principles for personal data processing, such as:

- the principle of lawfulness, fairness, transparency and accuracy by processing personal data lawfully, fairly and in a transparent manner in relation to the data subject (Article 5(1)(a) and (d) GDPR);
- the principle of purpose limitation by recognising that data are collected for specified, explicit and legitimate purposes (Article 5(1)(b) GDPR);
- the principle of data minimisation by recognising that the scope of processing must be adequate and limited to what is necessary for the stated purpose (Article 5(1)(c) GDPR);
- the principle of integrity and confidentiality by applying appropriate technical and organisational measures by the controller to ensure data security (Article 5(1)(f) GDPR).

We take all necessary precautions to prevent unauthorised access to legally protected information. Most importantly, we keep confidential any data marked with relevant clauses and use them solely for the performance of our job duties.

A number of internal regulations concerning the protection of customers' personal data are in force at the Bank. Their implementation is the responsibility of the data controller (the Management Board), while responsibility for keeping them up to date rests with the owners of the individual documents. Operational procedures relating to personal data processing are updated on an ongoing basis so that they reflect current requirements and ensure effective protection of customer data.

Directors of organisational units are responsible for the organisation, security and processing of personal data within their units. Employees, in turn, are obliged to process personal data in accordance with the authorisation granted to them, arising from the scope of duties defined for the position they hold. To this end, we develop and implement mandatory training programmes for employees on personal data protection, and we systematically monitor training completion.

To ensure compliance with personal data protection principles, we develop and implement mandatory training programmes for employees, and their delivery is systematically monitored.

In addition, the Bank's Security Centre undertakes activities aimed at increasing customer security in relation to cyber threats. Risk situations and customer needs are analysed regularly, enabling the implementation of appropriate solutions such as educational campaigns, additional safeguards in electronic channels or informational communications. These measures are also tailored to the needs of selected customer groups, including older people, young people and individuals with limited knowledge of banking services.

Remediation processes and channels for consumers and end-users to raise concerns [S4-3]

Effective and responsible handling of complaints processes plays a key role in building positive customer experiences and trust in the Bank. A key aspect of the Customer Experience Management Model is improving customer experience. We take systematic and targeted actions aimed at ensuring consistent, simple and satisfying interactions at every stage of contact with the Bank.

Based on the analysis of customer research, we identify key reasons for customer dissatisfaction and areas for improvement. We engage in strategic projects and initiatives linked to areas that improve the quality of customer experience. Ensuring high-quality complaints handling is an important element of our strategy focused on customer satisfaction.

Complaints

The process for handling customer complaints is a key element of the Bank's operations, affecting not only the institution's positive image, but also customer satisfaction and the improvement of internal processes. The main regulation governing complaint handling is the order *Process for handling customer complaints of Bank Polska Kasa Opieki Spółka Akcyjna*, which defines the rules and procedures for receiving and handling submissions. The basic assumptions of the process include:

- compliance with statutory requirements;
- transparency of complaint handling;
- clarity for the consumer;
- handling without undue delay.

We act in accordance with *the Act on handling complaints by financial market entities, the Financial Ombudsman and the Financial Education Fund*. Our customers may submit complaints in person at a branch, in writing, via the helpline, in electronic banking or via e-Delivery. We inform customers about all available contact channels in the Complaints Regulations, which we provide when entering into an agreement and additionally make available on the Bank's website; we also provide information on the rules and deadlines for submitting and handling customer complaints – **[Complaints – retail customer]**.

We systematically develop complaint submission channels in response to customer needs and regulatory requirements. This enables us to serve customers in line with their expectations, both at the complaint submission stage and during the response process.

Customers are also entitled to submit correspondence via an authorised representative; however, the Bank responds to the representative only where the power of attorney submitted expressly releases the Bank from the obligation to maintain banking secrecy. Complaints must include customer data – anonymous submissions are not processed because it is not possible to establish the facts and relate them to a specific case.

We verify each complaint for validity and whether the customer's claim should be accepted. The decision on whether a complaint is justified is taken based on the analysis of the collected materials and recommendations. Decisions on accepting a customer's claim are taken in line with authority limits and the guidelines described in *the document Process for handling customer complaints of Bank Polska Kasa Opieki Spółka Akcyjna.*

In dispute resolution, customers may seek assistance from the Customer Advocate, who handles the most difficult and non-standard cases requiring an individual approach and additional legal opinions. A customer who is a consumer of the Bank also has the option to apply for out-of-court proceedings before the Banking Arbitrator operating at the Polish Bank Association, or before the Financial Ombudsman.

Where a customer does not agree with the response to a complaint, they have the right to appeal. This can be done via the same channels available for submitting complaints. We also enable our customers to appeal to internal Bank bodies such as the Management Board or the Supervisory Board, and to external institutions, including the Financial Ombudsman, the Polish Financial Supervision Authority (KNF), as well as municipal and district consumer ombudsmen.

We handle all complaints and appeals while maintaining confidentiality and respecting personal data protection. To ensure GDPR compliance, data sent outside the Bank are encrypted and the decryption password is provided via a different communication channel.

We recognise that customer satisfaction with the complaint handling process has a direct impact on the Bank's reputation. Customers who experience a professional and effective approach to complaint handling are more likely to remain our customers and recommend the Bank's services to others. Therefore, we regularly monitor customer satisfaction with this process. Analysing opinions, collecting customer feedback and implementing appropriate improvements based on the data gathered are of key importance to us are. It allows us to maintain high standards of complaints handling. In periodic surveys of the complaints process, we ask customers about their use of, and satisfaction with, the channels available for contacting the Bank. In the Q4 2025 survey, customers chose digital channels for submitting complaints most willingly (31% PeoPay and 15% Pekao24). 36% of complaints were submitted through the helpline, while only 12% opted to submit a complaint in person at a branch. The number of complaints submitted in 2025 for retail banking, private banking and sole trader (JDG) segments totalled 220,066 (in 2024, this value amounted to 205,803).

We offer multiple contact channels so that customers can submit complaints in a comfortable way that suits them. At the same time, we ensure that submitting complaints in direct-service channels takes place with full protection of customer data, confidentiality and discretion that builds customer trust. The guidelines contained in the Customer Service Standards Book set out how to act in situations requiring particular care, including how to communicate information that is unfavourable from the customer's perspective. In line with these guidelines, we seek to mitigate the risk and customers' concerns about retaliatory actions.

Personal data breach

In the case of reports relating to a potential personal data breach, customers may submit requests to the Data Protection Officer via:

- the helpline,
- directly at a branch,
- in writing,
- email to: iod@pekao.com.pl,
- via electronic banking.

Information on contact channels is available on the Bank's website; additionally, any Branch employee can inform a customer about the possibility of submitting a request and can accept such a request. All requests are forwarded to the Data Protection Officer, who keeps statistics of requests from data subjects, the number of incidents (including breaches) and complaints received from the data protection authority.

Most correspondence relating to personal data breaches is sent to us electronically, followed by the helpline and paper form. We respond to reported breaches within the deadline, in accordance with GDPR requirements. To date, we have not recorded a complaint regarding failure to provide a response. Information concerning the information clause, which sets out all possible contact routes, is included in every process involving data processing (for external and internal customers), including in the content of all employee regulations.

Actions on material impacts on consumers and end-users, approaches to managing material risks and seizing material opportunities, and effectiveness of such actions [S4-4]

We consistently implement actions[39] aimed at ensuring equal treatment of all customers – regardless of their life situation, age or origin. In the further part of this document, we present key actions implemented in 2025, linked to topics identified as material in the double materiality assessment process.

Customer experience management

We place the customer and service quality at the centre of our attention to make contact with the Bank a positive experience. In line with the objective of our *Strategy*, we will:

- monitor customer experience systematically, rather than ad hoc;
- develop a service model that reflects changing customer needs;
- simplify communications and increase the intuitiveness of digital solutions so that customers choose remote channels as their first contact option with the Bank.

As a result of these actions, we expect the NPS indicator to increase to the level assumed in *the Strategy*. Our aspiration is therefore to be among the top three banks in the NPS ranking in mass-market segments.

[39] We provide a description of the implemented activities in accordance with the ESRS requirements. Depending on their nature, where possible we indicate the financial resources allocated for their implementation. In other cases, we present other resources involved - for example, employee resources or time spent on tasks.

At present, we focus on supporting business opportunities that foster the creation of positive value for customers. This means that we:

- increase customers' product uptake,
- tailor the offering to customers' needs – user-friendly in everyday use, with fewer formalities and faster processes,
- incorporate customer feedback into designed solutions and analyse customer opinions,
- simplify content, avoid unnecessary jargon, and write in plain, understandable language,
- use various customer contact channels,
- build loyalty by recognising long-standing customers,
- manage branch traffic to direct customers to the appropriate service desk,
- optimise solutions to improve the intuitiveness and accessibility of electronic banking,
- improve processes to make loan servicing more convenient and enhance the quality of ongoing loan servicing.

Product accessibility for all customers

Ensuring accessibility is a priority for us. We want every customer to assess their experience of contact with the Bank positively. We consistently strive to ensure that people with specific needs, including people with disabilities, can use our services freely, regardless of their individual limitations.

We have launched a dedicated webpage **[Pekao bez barier *(Pekao Without Barriers)*]**, which provides detailed information on measures supporting people with specific needs.

Our approach to accessibility is also consistent with the assumptions of *the Polish Accessibility Act*, which sets the standards to which we adapt our products and services in digital and information/communication terms.

Digital accessibility

We want everyone, regardless of skills or limitations, to be able to use the services and products offered by the Bank fully. We strive to ensure digital accessibility in line with legal requirements and best practice.

At the beginning of 2025, the Bank carried out an accessibility audit of mobile and online banking, assessing compliance with *the Act of 26 April 2024 on ensuring compliance with accessibility requirements for certain products and services by economic operators*, and thus with the international WCAG 2.1 standard. Based on the audit results, we took actions to adapt electronic channels to WCAG requirements:

- we add descriptions to non-text content and introduce captions for deaf users in audio-video recordings,
- we ensure content is displayed correctly on different devices regardless of type, size and screen format,
- we enable text enlargement without loss of clarity and readability issues,
- we provide sufficient time to complete actions, without unexpected content changes,
- we enable easy keyboard navigation without the need to use a mouse to proceed, across many components of our subpages,
- we provide the ability to adjust the volume level of our informational materials independently of system-wide settings,
- we do not publish content that could increase the risk of epileptic seizures,
- we expanded the branch and ATM finder with additional filters for available accessibility facilities.

With a view to ensuring full accessibility, our website and the PeoPay mobile application have been designed so that every user, regardless of their abilities, can use electronic banking functions comfortably. Thanks to the implemented solutions, customers already have access to most Pekao24 service functions with the support of assistive applications such as screen readers.

To further raise accessibility standards, we have introduced additional solutions facilitating the use of our services by people with diverse needs, such as:

- consistent identification of elements used across electronic channels,
- full screen responsiveness, enabling content to be displayed without the need for two-dimensional scrolling,
- easy navigation – menu elements and other navigation mechanisms are always in the same place and in the same order,

- comfortable use of buttons and other page elements,
- no cognitive function tests during authentication.

However, we recognise that adapting our website and application is a continuous process, and we continue to work on implementing further improvements so that our solutions best meet the needs of all users.

Information and communication accessibility

Clear communication with customers is not only a standard for us, but the foundation of trust-based relationships. That is why we prepare documents relating to retail banking products and services in a transparent and accessible way, using language consistent with the plain banking communication standard.

At the Bank, we focus on simplicity and clarity of messaging. We communicate in a partner-like manner, meaning that our content is phrased so that it can be understood without additional explanation:

- we use friendly language – in documents we use language so that no one has to waste time understanding it,
- we use personal forms of address – we do not create distance; we often address customers directly,
- we write in an accessible format – we format content clearly, so it is easy to read,
- we shorten content – we remove unnecessary words and phrases that only make the text longer,
- we are specific – we provide customers with the most important information.

At the request of customers with specific needs, we make standard bank document templates available in the following formats:

- audio recording,
- video recording in Polish Sign Language,
- Braille printout,
- printout in enlarged font.

To ensure the accessibility of our services for all customers, we introduced into internal regulations special provisions governing the conclusion of loan agreements with persons who do not speak Polish. This ensures that every customer, regardless of their language skills, can fully understand the terms of the products offered.

Information on available services and the rules for their use has been described clearly and transparently in agreements and regulations, so that it constitutes a legible source of knowledge necessary for informed use of the Bank's offering.

Accessibility also means being able to contact customers at any time, which is why our helpline is available 24 hours a day, 7 days a week at the following phone numbers:

- 519 222 222 for Retail and Premium Customers,
- 22 591 20 10 for Private Banking Customers.

Where necessary, we also provide service in Polish Sign Language in the form of a video call, on business days between 9.00 and 17.00 – **[service in Polish Sign Language]**.

We provide alternative contact methods, such as chat or a contact form, on the Bank's website – **[contact]**.

Architectural accessibility

We want everyone – regardless of mobility limitations – to be able to use our branches and partner outlets. We have prepared information on the architectural accessibility of outlets, which we publish on our website: **[outlets and ATMs]**.

Our customers can also filter the necessary facilities using the following criteria:

- accessible for wheelchair users without assistance – the immediate surroundings and service area allow a wheelchair user to move independently;
- accessible for wheelchair users with assistance – there are obstacles in the immediate surroundings or service area that mean a wheelchair user requires an assistant or support from our employee;
- parking nearby;
- parking with designated spaces for persons with disabilities.

In addition, guide dogs are allowed to enter all our branches and partner outlets.

To better identify customer expectations and present a tailored offer, we use tablets that support the needs identification process. We enable agreements to be signed via the PeoPay mobile application or by SMS, which increases convenience and service accessibility, especially for those who prefer remote forms of contact.

Our aim is to create a banking environment in which every customer, regardless of their capabilities, can count on professional, empathetic service tailored to individual needs.

ATMs and cash deposit machines

We treat access to self-service devices, such as ATMs and cash deposit machines, as an important element of ensuring full accessibility of our services. We want every customer to be able to use these solutions freely and without obstacles. On our website, we have provided a list of ATMs and cash deposit machines in the **[outlets and ATMs]** tab, including information on location and available facilities, and the ability to filter using the following criteria:

- accessible for wheelchair users without assistance – the immediate surroundings allow a wheelchair user to move independently;
- accessible for wheelchair users with assistance – there are obstacles in the immediate surroundings that mean a wheelchair user requires an assistant or support from our employee;
- contactless transactions – the function is activated by holding the card or phone close to the reader. The course of a contactless transaction is identical to a traditional transaction.

All our ATMs and cash deposit machines have Braille markings on the function keys, near the reader, the receipt printer and the cash dispensing area, as well as a tactile mark on the keypad on the “5” key.

Complaints about lack of accessibility

Anyone who notices that our products or services are inaccessible for any reason may report this to us in the manner described on the **[dedicated webpage]**.

We delivered mandatory training for all Bank employees on supporting people with different needs in accessing products and services, and we implemented a procedure comprehensively regulating the Bank’s activities regarding the accessibility of the retail banking offering.

In 2025, we modernised a further 70 branches to adapt their premises for people with specific needs. In each new branch, we installed two ATMs with a cash deposit machine and coffee corners.

Access to information

One of the key elements of building trust and positive customer experiences is ensuring full, transparent and understandable access to information. We believe that customers should be able to obtain information easily about products, services, terms of cooperation and their rights and obligations. Transparent communication not only supports informed decision-making but also strengthens a sense of security.

We base customer communication on the principles of accessibility, clarity and inclusiveness, so that everyone – regardless of age, experience or other circumstances – can use our services freely. We pay particular attention to seniors, for whom we have prepared a dedicated information space on the **[Senior Zone]** webpage, where we publish practical tips on getting started with online banking.

With the youngest users in mind, we offer products tailored to their age and needs, including the PeoPay Kids application for teenagers, equipped with a parental control panel. It enables young customers to learn how to manage their finances in a safe environment and build positive habits, such as saving supported by the “money box” function and an educational game available in the PeoPay app.

As part of our educational initiatives, we also developed an in-house report dedicated to financial education for children aged 6 to 13, representing our contribution to building the economic awareness of the youngest generations.

For the youngest customers of our Bank who began their journey into the world of finance, in 2025, on the occasion of the 5th anniversary of the PeoPay KIDS application, we prepared a series of six audiobooks “Bajki Oszczędzajki” (Saving Tales), combining education with engaging entertainment – ***[Bajki Oszczędzajki – Bank Pekao S.A.]***.

Together with the Universal Reading Foundation, we also developed a children’s book entitled *“Porwanie Pani Złotówki” (Kidnapping of Mrs Zlotówka)*. It is an engaging adventure that teaches that it is worth being guided by friendship, common sense and honesty, while also explaining what money is and how saving works. The book is available both online and in print form in selected Bank branches – ***[Czytanie się opłaca (Reading Pays Off – Bank Pekao S.A.]***. We also published the report ***[Finansowy świat dziecka (Financial World of a Child)]***, which shows how the need for children’s financial education among Poles is increasing.

We deliver services within the Pekao Group based on competence, professionalism and responsibility towards customers. The solutions we propose are designed with their real needs in mind and in compliance with consumer protection requirements. We do not use practices that could infringe the collective interests of consumers. We avoid situations in which a customer does not receive reliable, truthful and complete information, in particular information that is key to making an informed decision, such as product price or functionality. We do not allow prohibited contractual clauses, unfair market practices or actions constituting unfair competition.

We actively counteract misselling, i.e. offering financial services that do not correspond to the customer's real needs or are presented in a manner that is inadequate to their nature. Our aim is to build relationships based on trust, transparency and responsibility, which translates into high service quality and consumer safety.

Transparent product information is our starting point for understanding the topic of "access to information" – we feel responsible for actively supporting the development of financial knowledge in society, including among our customers. Financial education is an integral part of our activities, implemented through various initiatives aimed at increasing awareness and competence in financial management. We carry out a range of initiatives such as educational programmes, seminars, workshops, information campaigns and thematic guides available on the website, supporting the development of financial competences.

These activities focus on issues related to personal finance management and household budgeting, and cover investing, saving, using banking products and applications (e.g. PeoPay), as well as matters related to financial risk. Our goal is to provide practical knowledge that enables customers to make informed financial decisions and build a stable future.

Managing potential risks

As part of the double materiality assessment, we considered potential risks that may arise in the area of cooperation with customers and consumers. In the course of this work, we identified a risk which – despite a range of measures taken – may still occur. It relates to the possibility of misleading customers, including in connection with free credit sanctions (hereinafter: FCS) and unauthorised transactions.

Recently, we have observed a gradual increase in the number of lawsuits and complaints in the FCS area, although their scale remains limited relative to the size of the portfolio. Court proceedings cover approximately 0.15% of agreements in the portfolio and, in most cases – around 88% – judgements are favourable to the Bank. Nevertheless, judgements adverse to the Bank (including, potentially, rulings of the CJEU) may increase the scale of impacts and the number of outcomes unfavourable to the Bank.

The Bank takes actions to mitigate this risk, in particular by adapting template agreements and the method of calculating the APRC to *the Consumer Credit Act (Article 45 of the Consumer Credit Act* – where a lender breaches consumer rights by omitting or including incorrect statutory clauses, the borrower, upon submitting an appropriate request, repays the credit without interest and other credit costs due to the lender).

To further reduce SKD exposure, we also take operational and product measures, including:

- limiting the scale of new sales with potential FCS risk – the new sales volume carrying SKD risk decreased from 73% in January 2024 to 38% in June 2025. The share of agreements with financed commission also fell from 56% to 2% (short-term small loans with a low level of FCS risk). As a result of pricing policy changes from Q3 2024, the sale of commission-free loans has become dominant.

  In addition, from 1 August 2025, we introduced new solutions resulting in discontinuation of the sale of new agreements carrying FCS risk, i.e.:

− a CPI product with a non-financed monthly premium, which replaced CPI credit insurance withdrawn from sale,

− a credit account model enabling commission to be charged without charging interest on it.

- refinancing agreements carrying FCS risk from the existing portfolio into new loans (the share of cash loans in the Bank's portfolio carrying FCS risk fell from 74% in January 2024 to 55% in June 2025). We assume that the pace of the portfolio decline will accelerate in the following quarters due to measures taken to increase the scale of refinancing and the absence of growth in new agreements carrying FCS risk as a result of the discontinuation of sales of new agreements with financed CPI.

On 13 February 2025, the Court of Justice of the European Union (hereinafter: the "CJEU") delivered a judgement in case C-472/23 concerning aspects of applying the free credit sanction. The ruling highlights the importance of properly informing consumers about the total cost of credit and the annual percentage rate of charge, which may affect the interpretation of provisions applied in domestic proceedings.

The allegations most commonly raised against banks in cases concerning consumer credit include, among others:

- breach of Article 30(1)(7) of the Consumer Credit Act – indicating an incorrect total amount payable by the consumer determined on the date of concluding the consumer credit agreement and an incorrect APRC, resulting from (in consumers' view) the unauthorised charging by the Bank of interest on the financed commission for granting the credit (financing and charging interest on the credit granting commission), or on other financed costs;

- breach of Article 30(1)(10) of the Consumer Credit Act – failure to show the condition determining a change in credit costs resulting from early repayment of the credit or the application of the free credit sanction.

The CJEU judgement, as well as observed changes in the case law of domestic courts, may affect market practices relating to consumer credit in the future. The Bank continuously monitors the situation and implements measures to align processes, documentation and customer communication with applicable laws and consumer expectations.

Situations that may pose challenges both for customers and for the organisation are inevitable in dynamic financial services environment. Unauthorised transactions are one such threats – payment transactions to which the payer has not given consent in the manner provided for in the agreement between the payer and the payment service provider, e.g. a situation in which a third party (a fraudster) gains access to authentication data and carries out a transaction using it. Although authentication was completed correctly, due to the absence of the customer's consent to the execution of the transaction, i.e. because third parties (fraud) were involved in carrying out the transaction, such a transaction is considered unauthorised.

To enhance customer security and reduce the number of unauthorised transactions, we continued implementing technological, system and organisational solutions in 2025, in particular:

- we carried out educational campaigns aimed at customers on threats, fraud methods and ways to avoid them;
- we implemented further transaction monitoring functionalities in systems and anti-fraud modules, including new rules identifying suspicious transactions;
- we introduced changes to the mobile app to enhance the security of the app activation process. The new process covers both activation of the app on the first device and on subsequent devices;
- we implemented a solution enabling the rapid blocking of corporate customers' payment cards via the online banking service – both by the customer and by the system operator on the Bank's side;
- we implemented a solution to enable strong customer authentication in e-banking for operations involving deactivation of access to internet banking channels;
- we implemented a solution to enable strong customer authentication in e-banking for operations involving deactivation of access to internet banking channels;
- we implemented a solution in e-banking to introduce access restrictions for functionalities related to cross-border transfers that are not used by customers;
- we implemented a mechanism enabling the temporary disabling or limiting of the ability to execute card transactions after "tokenisation";
- we implemented an industry-wide behavioural biometrics solution, under which a customer using the services of one bank offering this solution can be protected across all other institutions using the same industry solution;
- observing the direction of changes in the banking sector, we made successive amendments to internal regulations to improve the process for handling unauthorised transactions.

As a result of these actions, we increased the level of security for retail and corporate customers and, by implementing more effective detection and prevention mechanisms, we optimised the number of unauthorised transactions. In addition, the initiatives undertaken contributed to improved compliance with sector regulations and recommendations of the Polish Financial Supervision Authority (KNF).

Insurance products

In 2025, we actively promoted insurance products — i.e. CPI PEX, CPI KH, Life Insurance and Property Insurance — which provide protection for customers, including in situations where, as a result of adverse events affecting the customer, further repayment of a loan or credit would be difficult.

We monitor the quality of the insurance products offered with great care, supported by cooperation with reputable insurance companies and regular analysis of customer complaints, refusal rates and claims ratios.

In line with the Good Practices for CPI insurance, we also began a process of periodically informing customers about the policies they hold that were purchased through the Bank. This increases customer awareness of the possibility of using the benefits arising from the insurance contracts concluded. In the past year, we introduced significant changes increasing value for the customer – in August 2025 with respect to CPI PEX Insurance, and in October 2025 with respect to Property Insurance.

Investment services

In 2025, we carried out an extensive training programme aimed at increasing by approximately 1,000 the number of employees holding regulatory authorisations to offer investment funds. As a result, customers in every retail branch have access to the Pekao TFI offering, which is an important step towards improving the quality of financial advice and increasing the availability of investment services.

Consumer privacy and data management

As part of implementing Security Strategy 7, we undertake actions to enhance customer security in the personal data protection area. We introduce solutions supporting safe use of banking services, including identity verification mechanisms and safeguards for communication with the customer, e.g. by developing functions in mobile apps that support identification of the employee and the customer, which significantly increases the security of telephone contacts with customers and minimises the risk of customers losing funds as a result of fraud.

To reduce the risk of data leakage, we implement security mechanisms aligned with current technological standards, including solutions supporting the safe use of AI technologies. These actions are tailored to the needs of different customer groups, including less digitally advanced customers, seniors and young people.

We also carry out educational and communication activities in the area of cybersecurity, including information campaigns and training for customers and employees. To increase awareness of cybersecurity, we run the cyberPEKAO educational programme, which includes, inter alia:

- training sessions and webinars for the Bank's employees and customers, as well as workshops for children, young people and seniors as part of CSR;
- organisation of cybersecurity-related events (Cybersecurity Days in Bank branches, the cyberPEKAO Academy – a conference for customers and employees);
- sponsorship and partnership at events strengthening social resilience to cyber threats – Cyber24 Day, the IN.SE.CON International Cybersecurity Congress, the Confidence conference;
- internal communication (information published on the security portal, news updates, e-mails addressed to employees);
- external communication (e.g. CRM, the Bank's website, social media, notifications in the mobile app, radio broadcasts);
- cooperation with the CyberDefence24 portal covering cybersecurity topics, which hosts a dedicated Bank zone;
- publication of a cybersecurity comic book for children, issued jointly with the CyberDefence24 editorial team;
- publishing cooperation in the field of society's digital education in projects such as Scamming Out and Entrepreneur's Educator;
- a nationwide educational campaign "cyberPEKAO – a sign that protects" (online campaign + social media);
- cooperation with the ISSA Poland Association and support for the "Digital Senior" project, as well as preparation and development of educational materials for seniors.

In 2025, we allocated more than PLN 2,900,000 gross (OPEX) to the cyberPEKAO programme. We monitor the effectiveness of the campaigns carried out, inter alia, by analysing reach and audience engagement.

We provide customers with information on the principles of data processing and the actions taken in a manner tailored to the communication channel. To mitigate the risk of improper management of customer data, we have appropriate procedures for informing Data Subjects – i.e. individuals to whom the data relate – about potential data protection breaches. We also provide customers with information on how to minimise the adverse effects of such incidents and how to avoid them in the future. In correspondence concerning complaints, we inform Data Subjects about the detailed rules for processing their personal data by the Bank or, where applicable, by BIK (Biuro Informacji Kredytowej – Credit Information Bureau). In addition, the Bank's Information Security Section analyses feedback received from the Personal Data Protection Office in the context of personal data protection breaches or complaints submitted by data subjects.

The primary way we assess the effectiveness of our consumer-privacy safeguards is by analysing feedback from the Personal Data Protection Office, particularly in relation to the Office's responses to:

- data protection breaches reported by the Bank and the actions taken to remedy their adverse effects; and
- complaints submitted to the Office by data subjects and the actions taken in response.

We conduct information and awareness-raising campaigns for customers, for example on online fraud. T The Data Protection Inspector's Department (DPID) reviews customer communications intended to increase awareness of various forms of fraud, such as phishing.

Implementing these actions across the Pekao Group requires significant resources, including qualified staff time and the maintenance of the necessary infrastructure.

13.3.2.2 Metrics and targets

Targets for managing material negative impacts, increasing positive impacts and managing material risks and opportunities [S4-5]

In our *Strategy,* we place customer relationships at the centre of our focus. In the context of the ESRS S4 disclosure, the key pillars of the Strategy are Accessibility and Growth.

Accessibility:
Our goal is to provide convenient access to banking services tailored to individual needs. In *the Strategy*, we described actions aimed at adapting products and services to the needs of various customer groups. A detailed description of these actions can be found in section [S4-4].

Growth
In line with our mission, we support customers at every stage of their lives – from opening their first account to making key financial decisions. Achieving this objective is based on continuously monitoring customer expectations, tailoring our offering to their needs and facilitating access to products.

As part of these assumptions, we set the following targets:

- Development of products and services for young customers aged under 26

We are expanding our product offering for young customers, tailored to their lifestyle, social relationships and needs at different stages of development. In 2025, our base of young customers under 26 totalled 1,196 million, compared to 1,132 million in 2024.

- Increase in the digitalisation rate and mobile engagement of customers – development of remote service

We are developing remote service as a mechanism to support customers by enabling convenient and secure use of our products without the need for a physical presence at a branch. In 2025, the share of digital sales was 57%, compared to 52% in 2024.

13.4 Corporate governance-related information – business conduct [ESRS G1]

13.4.1 Managing impacts, risks and opportunities

Business conduct policies and corporate culture [G1-1]

Ethics and responsibility form the foundation of how we conduct our business and of our organisational culture. Through our business conduct policies, we commit to complying with the highest ethical, legal and social standards, both in internal and external relationships. Documents such as *the Pekao Group Code of Conduct*, *the Polish Bank Association (ZBP) Banking Code of Ethics*, as well as procurement policies and rules for cooperation with suppliers, create a coherent system of values that supports a culture of compliance, transparency and sustainable development. These policies not only define the expected attitudes and behaviours of employees and business partners, but also indicate mechanisms for monitoring, reporting and improving processes. Their purpose is to build trust, strengthen corporate governance, and ensure that decisions made within the Pekao Group are aligned with the principles of integrity, responsibility and respect for human rights.

Our policies and procedures do not constitute policies within the meaning of the Minimum Disclosure Requirements (MDR-P). They include specific mechanisms to ensure the identification, assessment and remediation of the effects of negative impacts and risks. *The Code of Conduct* and *the Banking Code of Ethics* are supported by mandatory training, periodic reviews and reporting to the Management Board and the Supervisory Board. The breach reporting procedure guarantees secure channels, whistleblower protection and remedial actions. In relations with suppliers, we apply *the Procurement Policy*, *the Supplier Code of Ethics* and mandatory *ESG Forms*. Anti-corruption mechanisms, sector exclusions and metrics (e.g. number of trainings, invoice processing time) confirm the effectiveness of the measures taken and their tangible impact on reducing risks and strengthening positive effects around corporate governance.

Pekao Group Code of Conduct

In 2025, we updated *the Pekao Group Code of Conduct* (hereinafter: *the Code of Conduct*). It sets out the principles we follow in our day-to-day business operations. It is also our commitment to act in accordance with the highest standards in our relations with co-workers, partners, customers and the broadly understood environment. The principles of *the Code of Conduct* define the framework for our activities relating to:

- conducting activities in compliance with legal regulations, internal regulations, supervisory authorities' recommendations and generally accepted market standards;
- creating a working environment based on mutual respect, openness and partnership, in line with ethical principles;
- building an aspirational organisational culture based on trust and responsibility, empathy and understanding customer expectations, which are the foundation for building trust-based relationships.

In *the Code of Conduct*, we focus on compliance with the values identified and adopted by the Bank, which guide our day-to-day decisions, define our operating style and shape attitudes consistent with ethical principles. We also underline the importance of corporate governance as a key element supporting sustainable operations, taking into account environmental and social objectives. The Bank undertakes actions with respect for human rights; fulfils the foundations of our social responsibility through programmes supporting local communities; complies with cybersecurity principles by using certified solutions and conducting regular security tests; builds trustworthy and ethical artificial intelligence by applying guidelines on transparency and non-discrimination; and develops competencies in identifying, assessing, controlling and mitigating ESG risks through training and by implementing a system for managing this process.

In implementing the principles of *the Code of Conduct*, as in shaping an ethical culture, a key role is played by the Supervisory Board, the Management Board and the management staff.

The provisions of *the Code of Conduct* are binding on both members of the governing bodies and the Bank's employees; they also apply to subsidiaries of the Pekao Group and are implemented by them, considering the principle of proportionality and the specific nature of their operations.

The Code of Conduct is subject to periodic review carried out by the Compliance Department. Based on information provided by the Compliance Department, the Management Board periodically verifies and assesses compliance with the ethical principles set out in the Code of Conduct to adapt them to changes in the Bank's internal situation and external environment. Information on the results of this assessment is provided to the Supervisory Board.

Every employee of the Pekao Group is required to familiarise themselves with *the Code of Conduct* as part of certain mandatory trainings available on the e-learning platform and to confirm this either in writing or in the internal system. In 2025, 13,340 people completed training on the principles of the Code. The training was discontinued on 13 November 2025 due to the adoption of the new *Pekao Group Code of Conduct* and the launch of the process to develop training covering the new scope.

The scope of training on the principles of *the Code of Conduct* includes:

- mandatory e-learning platform training for new Bank employees;
- in-person trainings forming part of the onboarding process for new employees, supporting their integration with the Pekao Group and its shared values from day one.

Employees are informed about updates to *the Code of Conduct* via dedicated internal communications; in addition, they have ongoing access to its content and related training. *The Code of Conduct* has been published on the intranet on the page dedicated to the Compliance Department, under the "Compliance Culture" tab, as well as on **[our website]**.

Polish Bank Association Banking Code of Ethics

The Polish Bank Association (ZBP) Banking Code of Ethics (hereinafter: *the Banking Code of Ethics*) is another important business conduct document adopted for use in the Bank by resolution of the Management Board on 27 March 2024. This document sets out ethical principles applicable to the operations of banks, their employees, and the individuals and entities through which banks perform banking activities. *The Banking Code of Ethics* serves as a guide for conducting business ethically and in line with good practices, while supporting the building of trust in the banking sector and its reputation. It refers to good banking practices, ethical standards applicable in the financial industry and the Sustainable Development Goals (SDGs). It takes into account the needs of key stakeholders – customers, employees, business partners and local communities – providing for analysis of their feedback and the undertaking of remedial actions.

The Banking Code of Ethics was developed by the Banking Ethics Committee at the Polish Bank Association (ZBP) and is publicly available on the ZBP website and on **[our website]**. The principles of *the Banking Code of Ethics* were also communicated to the Bank's employees through internal communications, underlining their importance in the organisation's day-to-day operations.

The Banking Code of Ethics sets out the fundamental values that a bank should follow reliability, integrity, responsibility and transparency. It forms the foundation of relationships with customers, employees, business partners and other financial institutions. It promotes the idea of responsible banking, support for innovation and the development of modern technologies.

By introducing and applying *the Banking Code of Ethics*, we strengthen our organisational culture, relationships with customers, partners and local communities, and we also influence service quality by promoting ethical business decisions. The provisions of the document cover all ZBP member banks, their employees and cooperating entities, taking into account the impact of banking activity on local communities and the environment.

Compliance with *the Banking Code of Ethics* is monitored systematically. The ZBP Banking Ethics Committee prepares periodic reports on banks' relationships with stakeholders and reviews submitted complaints and claims. In parallel, employee trainings are conducted and the compliance of offered products with the adopted ethical standards is verified.

Responsibility for implementation, oversight and compliance with the principles of *the Banking Code of Ethics* lies with the Supervisory Board, the Management Board and the management staff, who ensure that ethical values form an integral part of the institution's day-to-day operations.

Breach reporting mechanisms and whistleblower protection

The Bank has implemented a comprehensive *Procedure for reporting breaches* (whistleblowing) at Bank Pekao S.A. (hereinafter: *the Whistleblowing Procedure*), aimed at enabling whistleblowers to report irregularities safely, confidentially and effectively. This procedure supports an ethical culture, compliance with laws and the Bank's internal standards, and sets out the rules for reporting breaches and protecting reporting persons.

The Whistleblowing Procedure covers all employees, co-workers, suppliers, persons performing work for the Bank and other natural persons who may obtain knowledge of breaches in a work-related context. The Management Board is responsible for its adequacy and effectiveness, while the Vice-President of the Bank's Management Board overseeing the Finance Division is responsible for its day-to-day operation, is the recipient of reports, and regularly (at least once every six months) provides the Supervisory Board with information on material reports. The Supervisory Board performs an annual assessment of the effectiveness of *the Whistleblowing Procedure*. The Compliance Department supports the Management Board in performing these tasks.

Whistleblowers have access to the following independent communication channels enabling confidential reporting of breaches:

- email: ZglosNaruszenie@pekao.com.pl,
- post: marked "Confidential" and addressed to the designated member of the Management Board or the Chair of the Supervisory Board (if the report concerns a member of the Management Board);
- telephone: recorded line +48 22 524 52 98,
- an in-person meeting with a Compliance Department employee, at the whistleblower's request.

Reports are verified as follows: the Compliance Department performs an initial assessment of the report, after which designated employee(s) conduct an explanatory investigation. A report is prepared documenting the findings and the course of actions taken. The whistleblower and the person concerned by the report receive feedback on the outcome of the investigation. Where a breach is confirmed, appropriate remedial or disciplinary actions are taken and preventive measures are implemented. Whistleblowers may also report breaches of law within the meaning of Article 3(1) of the Whistleblowers Protection Act to external authorities (e.g. the Ombudsman, CFII, PFSA) and make public disclosures, while retaining protection against retaliation.

Persons who receive and verify reports must hold a written authorisation and undertake to maintain confidentiality, including after termination of employment.

We guarantee the whistleblower:

- consideration of every report, including anonymous reports;
- confidentiality of personal data;
- a timely, diligent and impartial verification procedure;
- information that the report has been received and information on its outcome.

The whistleblower, persons assisting with the report and persons connected with the whistleblower are protected. The prohibition of retaliation also applies to unfounded reports, provided they were made in good faith. The burden of proof that actions were not retaliatory rests with the employer.

Examples of retaliatory actions prohibited by the Bank include:

- termination of employment, reduction in remuneration, being overlooked for promotion;
- negative performance appraisal, change of workplace, bullying/mobbing, intimidation;
- restricting access to training, hindering finding employment;
- infringement of personal rights, including reputation.

We offer numerous support measures for whistleblowers, such as psychological assistance, the possibility of remote work, exemption from the obligation to perform work while retaining remuneration, temporary transfer to another position, or transfer to another organisational unit once the validity of the report has been confirmed.

We provide mandatory whistleblowing training:

- for new employees – within three months of starting work;
- for all employees – periodically, at least once every two years.

Training may be delivered in electronic form and is intended to ensure familiarity with *the Whistleblowing Procedure*, as well as to strengthen awareness of the rights and obligations of whistleblowers and persons involved in the process. In 2025, we trained 13,362 people at the Bank.

When developing *the Whistleblowing Procedure*, we took into account the interests of key stakeholders by adopting solutions that address their needs, concerns and expectations. The implementation of a transparent and effective *Whistleblowing Procedure* is an expression of our responsibility and strengthens the Bank's reputation as an ethical and transparent institution.

The Whistleblowing Procedure refers to external legal acts such as:

- the Whistleblowers Protection Act – the main legal act governing the rules for reporting breaches and protecting whistleblowers in Poland;
- the Act on Counteracting Money Laundering and Terrorist Financing – in relation to the obligation to report breaches in this area;
- the Banking Law Act – regulations on banking activity together with implementing regulations, i.e. the regulation on the risk management system, internal control system and remuneration policy in banks;
- the Act on Trading in Financial Instruments together with implementing regulations, i.e. the regulation on detailed technical and organisational conditions for investment firms, state-owned banks conducting brokerage activity, banks referred to in Article 70(2) of the Act on Trading in Financial Instruments, and custodian banks, as well as the Act on Supervision of the Capital Market – in the context of compliance with the financial market;
- the MAR Regulation (Market Abuse Regulation) – EU Regulation No 596/2014 on market abuse.

We make the procedure available on the Bank's intranet, while information on the *Procedure for reporting breaches (whistleblowing) at Bank Pekao S.A.* has been made available on our **[website]**. Natural and legal persons seeking to cooperate with the Bank become familiar with it at the recruitment or negotiation stage.

Guided by the principles of social responsibility and care for employee well-being, we have also implemented an internal *Procedure for preventing bullying (mobbing), discrimination, harassment and other undesirable behaviours* (hereinafter: *the Anti-bullying Procedure*). Its purpose is to effectively prevent and eliminate any forms of improper treatment in the work environment, including behaviours that violate personal dignity and undermine a climate of cooperation and mutual respect. This procedure supports the Bank's organisational culture based on the values: STRAIGHTFORWARDLY, TOGETHER, BOLDLY, RESPONSIBLY, WITH DETERMINATION, OPENLY and HONESTLY, and constitutes an important element of the ethics management and social risk management system.

The document applies to all Bank employees, regardless of position, and applies in all work-related situations, both at the place of work and during secondments or business travel. The procedure provides for no exclusions, which underlines its universal nature and importance for the entire organisation. Responsibility for implementation and oversight of compliance with the provisions lies with the employer, represented by the Director of the People, Organisation and CX Division.

As part of the monitoring mechanisms, the Director of the People, Organisation and CX Division is required to report annually to the Bank's Management Board on the implementation of the Procedure. Documentation from the work of the committee appointed to review complaints is retained for three years.

The Anti-bullying Procedure fulfils obligations arising from the Labour Code, in particular: Article 94(2b) – counteracting discrimination, and Article 943 § 1 – counteracting bullying (mobbing). It also takes into account the interests of the Bank's key stakeholders, i.e. employees, by protecting their dignity and ensuring safe channels for reporting complaints, as well as witnesses and committee members, by protecting them against retaliatory actions.

We make the document available on the intranet, and each employee is obliged to familiarise themselves with its content and confirm this by signing a statement.

Supplier relationship management [G1-2]

Cooperation with suppliers – regardless of the scale of their operations – is of key importance to us. Each partner is selected transparently, in accordance with our procedures, market best practices and applicable laws. We do not have a dedicated policy for preventing payment delays.

Procurement Policy

In the Bank, procurement processes are governed by three primary internal documents: *the Procurement Policy of Bank Polska Kasa Opieki S.A.* (hereinafter: *the Procurement Policy*), *the Rules for procurement conducted by the Procurement Department* (updated in January 2026), and *the Rules for procurement conducted without the involvement of the Procurement Department* (updated in March 2025). The Procurement Department is responsible for implementation, management and monitoring of these policies, as well as for improving procurement processes.

The Procurement Policy is a tool for implementing the strategic vision for the development of the procurement function and ensures transparency, compliance with ESG principles and uniform standards for procurement proceedings. This policy governs the organisation and oversight of procurement processes in the Bank and covers the entire procurement cycle – from procurement planning, through supplier selection, contract execution and supplier cooperation, to reporting and monitoring of results. Oversight of these processes is exercised by the Procurement Department, which is responsible for process management, monitoring effectiveness, improvement, initiating cooperation and setting performance indicators. After each contract is completed, an assessment is carried out jointly by the Contract Administrator and the Buyer. In addition, the Management Board receives a quarterly report covering all procurement processes conducted by the Bank.

The Procurement Policy takes into account the interests of:

- suppliers – through clear rules of cooperation, a procurement platform and the supplier zone;
- the Bank's organisational units – through support, guidelines and procurement tools;
- the Capital Group – through joint projects, benchmarking and cost synergies;
- society and the environment – through the implementation of ESG principles.

We make *the Procurement Policy* available on the Bank's intranet. Documents and communications related to Procurement Processes are published in the **[Supplier Zone]**.

Supplier Code of Ethics

In the Supplier Code of Ethics of Bank Pekao S.A. (hereinafter: *the Supplier Code of Ethics*), we set out the rules for cooperation with suppliers and their subcontractors. In this way, we promote social responsibility, transparency, sustainable development, respect for human rights and the principles of business ethics.

The purpose of *the Supplier Code of Ethics* is to ensure that suppliers act in accordance with the Bank's values and support its ESG strategy. The document contains no explicit exclusions but requires the supplier to submit a statement confirming that they have read it and undertake to comply with its principles. In accordance with *the Supplier Code of Ethics*, the Bank may identify potential breaches and take corrective actions, which ensures the effectiveness of the implemented principles.

Under *the Supplier Code of Ethics*, we expect our partners to meet specific criteria in individual ESG areas:

- Environment:

– holding valid permits, licences, notifications, declarations, agreements and decisions relating to environmental protection in connection with their operations;

– timely payment of environmental charges for use of the environment;

– compliance with relevant environmental reporting requirements;

– striving to minimise the adverse environmental impact of their operations;

– efficient resource management;

– reducing the consumption of materials and raw materials;

– managing waste in accordance with applicable legal requirements;

– undertaking actions aimed, inter alia, at reducing greenhouse gas emissions within the organisation and its supply chain and related disclosures;

– promoting environmental protection actions.

- Social factors:

– employees' right to terminate employment at any time;

– prohibition of any forms of forced labour, child labour and employee discrimination;

– timely payment of remuneration and compliance with rules on deductions from remuneration;

– counteracting bullying (mobbing) and discrimination in the workplace;

– the right to freedom of association, collective bargaining and choosing representatives in accordance with the law;

– monitoring and assessment of employees' exposure to health and safety hazards, including harmful chemical, biological, physical and ergonomic factors;

– providing personal protective equipment and information on risks arising from OHS hazards and fire safety regulations.

- Corporate Governance:

– protection of legally protected information;

– timely settlement of financial obligations;

– counteracting corruption;

– counteracting money laundering and the financing of terrorism and criminal activity;

– consumer protection;

– maintaining professional secrecy and business secrecy;

– protection of personal data;

– antitrust prevention;

– applying the principles of fair competition;

– counteracting conflicts of interest;

– protection of intellectual property and transfer of technology and know-how.

In *the Supplier Code of Ethics*, we take into account the interests of key stakeholders by, inter alia, promoting fair working conditions, counteracting discrimination, bullying (mobbing) and child labour among our suppliers' employees, supporting social initiatives for local communities, requiring actions for environmental and climate protection, and ensuring compliance with laws and ethical principles towards the Bank's customers. In the area of counteracting discrimination and bullying, compliance with these requirements is additionally verified through questions included in ESG Forms completed by suppliers each time as part of procurement proceedings. In addition, the document refers to: *the Ten Principles of the United Nations Global Compact* (human rights, anti-corruption, environmental protection), t*he Pekao Group Code of Conduct* and t*he Bank Pekao Strategy*. Responsibility for managing t*he Supplier Code of Ethics* arises from the Bank's internal regulations and is assigned to the Procurement Department within the Finance Division. We make its full text available on our website under **[Corporate governance]**.

The Supplier Code of Ethics is a guiding document, and to obtain information on sustainable development criteria we use *ESG Forms* completed based on the supplier's self-classification depending on the definition applicable to the enterprise.

ESG Form

By introducing a requirement to complete *an ESG Form* for all procurement proceedings, regardless of their value or the size of the potential supplier, we clearly emphasise the importance of actions in support of sustainable development, environmental protection and respect for human rights throughout the supply chain. Enforcing this requirement expresses responsibility towards business partners and the social environment, while at the same time enabling ongoing monitoring of compliance with the adopted standards without identifying material risks in this area.

ESG Forms for large, medium, small and micro enterprises are used to:

- assess suppliers' level of engagement in sustainable development activities;
- verify compliance with *the Code of Ethics;*
- obtain information on policies, procedures and practices applied by suppliers in the environmental, social and corporate governance areas;
- manage ESG risk in the Bank's supply chain;
- support transparency and accountability in business relationships.

Rules for procurement conducted by the Procurement Department

The Rules for procurement conducted by the Procurement Department (hereinafter: *the Procurement Rules*) are a comprehensive document governing the entire procurement process, from planning needs to finalising the order and acceptance of deliveries/services/works. Their main purpose is to ensure consistency, transparency and compliance with the Bank's procurement policy, as well as adherence to ESG standards in the supply chain, operational efficiency and control of procurement risks. This document not only describes the specific stages of the process, but also defines the roles and responsibilities of participants, including the Procurement Department, substantive units and the Management Board.

The procurement process begins with planning, which is carried out cyclically and reported to the Management Board. Next, requisitions are submitted, which are analysed and approved. Supplier selection is based on recommendations and evaluation of bids, using tools such as an evaluation sheet that includes formal, commercial and substantive criteria. The entire process is documented in the form of a supplier selection recommendation, and any deviations from procedures are reported to the appropriate control units, such as the Audit Department or the Bank Security Centre.

The Procurement Rules apply to all procurements carried out by the Procurement Department, except those covered by separate procedures – e.g. procurements up to PLN 100,000 net, emergency procurements, technical procurements, procurements from electronic catalogues, or those related to outsourcing and real estate. The document provides that the Director of the Procurement Department is responsible for implementation and interpretation of the rules, while the Management Board approves procurement decisions in strategic areas such as outsourcing or consultancy services.An important aspect of the Procurement Rules is their integration with group policies and external standards. Procurement proceedings require the use of *ESG Forms, the Supplier Code of Ethics, Anti-corruption Rules* and *the Whistleblowing Procedure*. EBA, DORA and GDPR guidelines are also taken into account. This ensures that the procurement process not only meets formal requirements but also supports sustainable development and social responsibility objectives.

We make *the Rules* available on the intranet together with document templates, instructions and communications. In this way, we create a coherent system that enables effective procurement management in a large financial institution while maintaining high ethical, operational and regulatory standards.

Rules for procurement conducted without the involvement of the Procurement Department

The Rules for procurement conducted without the involvement of the Procurement Department differ from the rules applicable to procurements conducted by that department primarily in terms of scope of application, the degree of procedural regulation and control mechanisms. Procurement without the Procurement Department primarily concerns lower-value transactions – up to PLN 100,000 net – and those included on a list of subject-matter exclusions, such as procurements related to HR, taxes, donations or trainings. Unlike the full procurement process, these procurements are simplified and operational in nature, allowing the Bank's organisational units greater autonomy in meeting procurement needs.

Requisition registration takes place only in selected cases, and budget control is carried out by the budget owner or the project manager. For procurements with a value exceeding PLN 10 million net, approval by the Management Board is required. Responsibility for executing the procurement lies with the organisational units managing projects or budgets, while the Procurement Department plays an interpretative role.

Training on *the Procurement Policy*, *the Procurement Rules* and the Integrated Procurement Tool (Procurement Platform) is delivered in the Bank by the Procurement Department. This training is intended to provide Bank employees with appropriate knowledge enabling them to understand the rules governing procurement processes. We want to ensure that they can apply internal regulations in practice and navigate the Integrated Procurement Tool environment, and that they are aware of their role and responsibility in the procurement process, acting in accordance with the principles of transparency and ESG compliance.

The training is addressed to internal customers, i.e. employees who submit training requests, budget owners responsible for financing procurements, members of procurement teams (participants in proceedings), Procurement Department employees involved in implementing procedures, and supporting units such as the Financial Planning Department, the Legal Department or the Bank Security Centre.

We deliver training in the form of e-learning, in-person or online workshops, as well as onboarding trainings for new employees. Training may be mandatory for specific roles, such as buyers or internal customers. The Procurement Department may also initiate training as part of process improvement.

In 2025, 367 employees were trained during dedicated sessions delivered by Procurement Department staff. In addition, 235 employees completed training in the e-learning system.

Organisational culture

Responsibility for strengthening our organisational culture lies with a dedicated unit – the Organisational Culture Office within the HR Strategy Centre. This is where initiatives are developed and delivered to promote the Bank's values and support the development of our organisational culture. The implementation of individual activities is closely aligned with the Bank's current needs – both strategic and those arising from employees' feedback expressed in surveys (in 2024: the Employee Engagement and Satisfaction Survey, the Collaboration Survey and the Psychophysical Well-being Survey; in 2025: preparations for the Organisational Health Survey) as well as in questionnaires conducted after events such as the World Values Day or Children's Day.

The foundation of the Bank's organisational culture is its values and behaviour that stem from them, as well as employees' everyday rituals and attitudes – rather than formalised guidelines. STRAIGHTFORWARDLY, TOGETHER, BOLDLY, RESPONSIBLY, WITH DETERMINATION, OPENLY and HONESTLY – these are the values on which we base our efforts to build the Bank's culture. The values are embedded in the Strategy. They are consistently reflected in email communications to employees, during business and sports meetings, and in materials published on the intranet and in company newsletters. Their importance is also emphasised when presenting financial results, implementing new projects and in HR activities.

Topics related to organisational culture are also raised by the Management Board and highlighted during events aimed at employees. One example was the Town Hall held on 26 May 2025, during which members of the Management Board held a dialogue with employees about the updated catalogue of values. The topic of values, attitudes and behaviours is present in our communications – during presentations of quarterly and annual results, in reports of the People, Organisation and CX Division, and in the Management Board's day-to-day engagement with employees. Other value-related initiatives are described in section [S1-1].

We support the promotion of attitudes consistent with our values through various forms of recognition. We reward employees through dedicated competitions and challenges, and in 2025 we incorporated the values into the employee performance appraisal process – employees' behaviours are assessed for alignment with the values.

We also run a range of educational programmes that support the development of organisational culture and promote values, including:

- a series of online trainings for managers and employees focused on the practical application of values in day-to-day work;
- the "Mission: Development" programme – aimed at employees with high development potential;
- the "Sugar Free" programme for women – supporting women's professional and personal development within the organisation;
- an onboarding programme – introducing new employees to the culture and values from their first days at work.

We provide space for sharing feedback and submitting suggestions related to organisational culture. The Bank has a dedicated email inbox to which any employee can send a message – whether a question, an idea or an opinion on activities in the area of organisational culture.

Minimum reporting requirements for policies in the area of business conduct:

POLICY NAME	IRO	APPROVING BODY	SCOPE/EXCLUSIONS
Pekao Group Code of Conduct	Corporate culture	Management Board	Group
Polish Bank Association Banking Code of Ethics	Corporate culture	General Meeting of the Polish Bank Association (ZBP)	the Bank and the Bank's environment – customers, partners, local communities
Whistleblowing procedure in Bank Pekao S.A.	Whistleblower protection	Management Board	the Bank, co-workers, suppliers and other natural persons who may obtain knowledge of breaches in a work-related context
Procedure for preventing mobbing, discrimination, harassment or other undesirable behaviour at Bank Polska Kasa Opieki Spółka Akcyjna	Corporate culture: Whistleblower protection	President of the Management Board	Bank
Anti-corruption policy in the Bank Pekao S.A. Group	Corruption and bribery: prevention and detection of corruption, including training; incidents of corruption and bribery	Management Board	Group
Bank Pekao S.A. Supplier Code of Ethics	Supplier relationship management, including payment practices	Management Board	Bank
Procurement Policy in Bank Polska Kasa Opieki Spółka Akcyjna	Supplier relationship management, including payment practices	Management Board	Bank
Rules for procurement conducted by the Procurement Department at Bank Polska Kasa Opieki S.A.	Supplier relationship management, including payment practices	Management Board	Bank
Rules for procurement conducted without the involvement of the Procurement Department at Bank Polska Kasa Opieki Spółka Akcyjna	Supplier relationship management, including payment practices	Management Board	Bank

Preventing and detecting corruption and bribery [G1-3]

Within the Pekao Group, we take a firm stance against any forms of corruption and situations that could facilitate it. We do not tolerate corrupt conduct, regardless of whether it is undertaken by Bank employees or by persons or entities merely connected with the Bank. This includes offering, promising, requesting, giving or receiving so-called facilitation payments (small, unofficial payments made to expedite routine actions) by employees or other persons.

The Anti-corruption Policy in the Bank Pekao S.A. Group adopted by the Management Board (hereinafter: the Anti-corruption Policy) is the comprehensive set of principles, procedures and mechanisms we use to effectively prevent, detect and address cases of corruption and bribery in our organisation. This document is an integral part of the compliance and risk management system within the Pekao Group and applies to all Bank employees and every area of our operations. We make the content of this policy available to all employees in the intranet repository of internal regulations. We plan to review and update this regulation soon.

In the areas identified, *the Anti-corruption Policy* requires anti-corruption assessments to be carried out for specific events that may bear the hallmarks of corruption. Employees should continuously assess events in which they participate or with which they come into contact for potential corruption risks. Anyone who becomes aware of an attempted act of corruption or conduct bearing the hallmarks of corruption is required to report it to the Anti-Corruption Officer (hereinafter: the Officer).

We identify the main areas of corruption risk as situations and processes where there is an increased likelihood of irregularities or abuses, including:

- receiving/giving gifts;
- using intermediaries' services;
- using contractors' services;
- the recruitment process;
- granting/receiving donations and sponsorship;
- the Bank's participation in public procurement procedures;
- mergers and acquisitions (M&A) transactions;
- significant investments.

In addition, the Bank operates *an Anti-corruption Programme*, which includes i.a. the development of procedures for high-risk areas (e.g. gifts, intermediaries, contractors, recruitment, donations, public procurement, M&A transactions). It assumes role-based and electronic training, the implementation of control mechanisms and reporting to the Bank's Management Board. With respect to vetting entities cooperating with our Bank, this includes corruption risk assessments for intermediaries and contractors, verification of beneficiaries of donations and sponsorship, risk assessment in public procurement, and a due diligence procedure in M&A transactions.

As part of preventive measures, we have implemented several rules of conduct, including:

- a prohibition on any corrupt conduct by Bank employees;
- a prohibition on facilitation payments;
- an obligation to assess corruption risk in day-to-day operations;
- protection for employees reporting cases of corruption.

The process for detecting corruption incidents is based on a reporting system and incident analysis. Employees are required to report attempted corruption to the Officer, the Director of the Compliance Department and, in the case of an attempted bribe, to law enforcement authorities.

Employees who refuse to participate in conduct bearing the hallmarks of corruption or who report its occurrence or attempted occurrence by other persons or entities are fully protected, even if their actions expose the Bank to losses. Enforcement of *the Anti-corruption Policy* is supported by the Compliance Department, including the registration of reports, risk analysis, incident assessment and monitoring of the implementation of recommendations. The Compliance Department provides the Management Board with periodic reports, including the number of reports.

The Officer plays a key operational role in the Pekao Group's anti-corruption system. This function may only be performed by persons with appropriate professional qualifications employed in the Compliance Department – a unit independent from business structures, with the appropriate status in line with Recommendation 12 of the Polish Financial Supervision Authority's Recommendation H.

The Officer is responsible for analysing and assessing reports concerning potential corruption incidents, issuing opinions and recommendations, monitoring the implementation of remedial measures and reporting to the Management Board. The Officer cooperates with the Legal Department and the Bank Security Centre but does not report to the units concerned by the report.

Within the scope of their powers, the Officer has the right to access information necessary to perform their tasks, obtain support from employees of relevant organisational units, and request additional explanations or documents from the applicant, which the applicant is obliged to provide.

All reports and requests are registered in the Bank's dedicated IT system, which centralises anti-corruption-related data and enables management information to be prepared.

Where a corruption risk is identified, the Officer issues recommendations on further actions, and the person responsible for implementing them reports on how those recommendations have been carried out. It is worth noting that the Officer's remuneration is not linked to the Bank's financial performance, which further strengthens the Officer's independence.

We regard the independence of persons conducting corruption investigations as the foundation of an effective anti-corruption system. By clearly separating investigative functions from management structures that may be involved in a case, we ensure the impartiality and efficiency of the process. Where a corruption risk is identified, the remedial measures indicated by the Anti-Corruption Officer apply, and their implementation is monitored by relevant units. These solutions allow ongoing adjustment of operational practices to identified needs and reduce the risk of recurrence of irregularities.

In addition, *the Anti-corruption Policy* ensures that persons conducting investigations are not linked to the units covered by the report, operate independently of management structures, have the necessary competencies and have access to tools enabling an objective assessment of corruption risk.

The process of identifying corruption events takes place within units substantively responsible for the relevant area, while the explanatory proceedings are conducted by the Officer – in some cases in cooperation with the Bank Security Centre. To ensure objectivity, we have deliberately separated the identification and verification functions.

The anti-corruption system is based on the following independence mechanisms:

- incident reports are routed outside the operational structure – to independent units;
- risk analyses are carried out by persons not involved in the processes concerned by the report;
- in the event of a negative opinion from the Officer, only the President of the Management Board may decide to continue cooperation with a given intermediary;
- the Officer oversees the implementation of recommendations.

After detecting an actual corruption incident, we take appropriate actions, including notifying the police or the public prosecutor's office, notifying the Officer, and cooperating with the Office for Analysis and Counteracting Transaction Fraud.

If a corruption risk is identified after an M&A transaction has been completed, we recommend implementing the mechanisms of *the Anti-corruption Policy*, the implementation of which is monitored by the Officer.

In the event of a negative opinion from the Officer, only the President of the Management Board may decide to continue cooperation with an intermediary or within public procurement.

In *the Anti-corruption Policy*, we have defined the procedure for reporting investigation results to administrative, management and supervisory bodies. This procedure is based on the principles of transparency and accountability and includes the following stages:

- Registration

Reports concerning corruption are registered in the Compeo system maintained by the Compliance Department. Documentation is retained in accordance with the personal data retention policy.

- Reporting to the Management Board

The Compliance Department provides the Management Board with a quarterly activity report, which may include, inter alia, the number of reports, analysis outcomes, implemented remedial measures and systemic risks, where such information is relevant to the given report.

- Reports on M&A and investments

In the case of M&A transactions or significant investments, the team responsible for the transaction prepares a corruption risk analysis report. The report contains an opinion on the corruption risk associated with the transaction and may indicate measures for managing that risk.

Anti-corruption training covers all Bank employees, regardless of position. New members of the Supervisory Board receive basic information about the Bank's anti-corruption process. New employees participate in training as part of onboarding and then cyclically – every two years. Training is delivered in the form of:

- role-based training (at the workplace);
- electronic training (e-learning);
- dedicated training tailored to the specifics of organisational units and the subject matter.

The training covers the following topics:

- basic information about corruption, the Corruption Perceptions Index, examples of corrupt conduct, risk management principles, and areas particularly exposed within the Pekao Group;

- use of intermediaries, gifts and entertainment, recruitment processes, cooperation with contractors, donations and sponsorship, M&A transactions, public procurement;
- procedures for actions by public authorities at company premises, criminal liability for corruption offences, standards and good practices, and a knowledge test.

E-learning is delivered once as part of the onboarding process and subsequently in line with the recurring schedule. In addition, in response to needs reported by organisational units, we also organise topical training sessions. In 2025, we updated and launched the anti-corruption e-learning. Anti-corruption training was completed by 13,287 people (in 2024 – 12,869 people), representing 99.5% of the Bank's employees. At the Bank, we do not differentiate positions in terms of susceptibility to corruption – we recognise that any employee may be exposed to corruption risk.

Moreover, we analyse the need for further changes to the anti-corruption policy and consider making appropriate amendments.

In the case of subsidiaries of the Bank Pekao S.A. Group, their employees are not covered by the Bank's e-learning. However, the companies receive information about changes to *the Anti-corruption Policy* together with recommendations for implementation, taking into account the specifics of their operations. *The Policy* provides for a training obligation and for the relevant application of its provisions in subsidiaries.

We communicate *the Anti-corruption Policy* in a multi-channel and systematic manner to ensure its accessibility, understanding and effectiveness among those for whom it is relevant. The key provisions of *the Anti-corruption Policy* are publicly available on **[our website]**. Employees have access to reporting systems and forms as well as the full text of the document in the internal system. In the event of incidents or doubts, employees may contact the Officer.

13.4.2 Metrics and targets

Objectives for supplier cooperation

In *the Strategy,* which is currently in force, we set a target whereby 90% of suppliers participating in procurement processes should declare compliance with the Supplier Code of Ethics. At the end of 2025, the result was 97.93%, and it is monitored annually by the Strategy and Risk Development Department and the ESG function. The target was defined in 2025; therefore, we do not present comparative data for 2024.

Incidents of corruption or bribery [G1-4]

In 2025, there were no cases where convictions or fines were imposed on our Bank or its employees for breaches of anti-corruption regulations and anti-bribery provisions. We also recorded no court cases involving the Bank or its employees relating to corruption or bribery.

In 2025, the Bank made no donations to external entities, except for funds transferred to the Bank Pekao S.A. Foundation for its operations, which also include sponsorship and donations.

Payment practices [G1-6]

Fair and transparent business relationships, timely settlement of liabilities and favourable commercial terms are a priority for our organisation. Although there is currently no single, formalised payment policy for the entire Group, financial liabilities are settled in accordance with the provisions of individual agreements with suppliers.

According to the analysis of data from IT systems, the average payment processing time measured from the moment the invoice is received until the day it is paid amounted to 21.34 days in 2025 (compared to an average of 17.92 days in 2024). We do not have a policy defining standard payment terms (in number of days) therefore, we do not report the percentage of invoices paid in accordance with such terms broken down by main supplier categories. Since we do not have established standard payment terms, we are unable to provide the average number of days of invoice payment delays. The absence of any new legal disputes with suppliers initiated in 2025 regarding payment delays may indicate that such delays are of a purely technical nature.

In 2025 we have recorded one legal proceeding concerning payment delays, which had already been disclosed in the Statement for 2024. It is pending before the court of first instance and concerns claims related to late payment of lease rent for a property whose right of use the Bank previously disposed of.

Date	Name/Surname	Position/Function	Signature
17.02.2026	Cezary Stypułkowski	President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature
17.02.2026	Marcin Gadomski	Vice President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature
17.02.2026	Łukasz Januszewski	Vice President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature
17.02.2026	Michał Panowicz	Vice President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature
17.02.2026	Robert Sochacki	Vice President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature
17.02.2026	Błażej Szczecki	Vice President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature
17.02.2026	Dagmara Wojnar	Vice President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature
17.02.2026	Marcin Zygmanowski	Vice President of the Bank's Management Board	The original Polish document is signed with a qualified electronic signature