



BNP PARIBAS

2024

**Management Board's
Report on the activities
of the BNP Paribas
Bank Polska S.A. Group**

#BANKDOBRYCHDECYZJI



including Management Board's Report on the activities of BNP Paribas Bank Polska S.A. in 2024 and the Sustainability Statement of BNP Paribas Bank Polska S.A. Group in 2024

This document is a translation from the original Polish version. In case of any discrepancies between the Polish and English versions, the Polish version shall prevail.



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Letter from the Chairwoman of the Supervisory Board



Dear All,

2024 was a year abounding in changes on the global geopolitical stage. One of the most prominent among them was the re-election of Donald Trump as President of the United States. The consequences of his electoral victory will be far-reaching for international economies in the years to come, and may even significantly reshape the world as we know it.

Donald Trump's return to the White House concurs with a number of other challenges and risk factors, such as the escalation of the conflict in the Middle East and the ongoing war in Ukraine which broke out three years ago. The latter poses particular threats to the stability and security of our continent. On the one hand, it compels European countries to ramp up their defense spending. On the other, it spurs the European Union's integration in areas such as energy generation and distribution, digital security, innovation of the European economy and migrations.

Against the backdrop of global turmoil, the Polish economy looks solid. 2024 brought an increase in domestic demand and an acceleration in GDP growth, putting Poland among the fastest-growing countries in the European Union. Inflation is slowing down, the Polish zloty remains stable, and the unlocking of funds under the National Reconstruction Plan should boost both public and private investment. Unemployment remains low, which, combined with increasing wages, will continue to drive up consumption volumes.

In 2024, we recorded record-high performance as measured by net banking income (PLN 7.8 bn) and net profit (PLN 2.4 bn). We generated a return on capital of 16.9%. The bank's balance sheet remains very stable, with good quality of the loan portfolio, secure liquidity position and capital buffers (despite the burden of CHF loan-related law risk provisions on our bottom line). What we consider extremely important is that owing to the organic growth of the bank's capital in 2024, we were able to pay dividends to our shareholders. I believe this change is permanent.

In 2024, we rapidly developed our product offering, especially in the area of digital solutions. Today, the banking sector is under constant competitive pressure from high-tech companies, fintechs and e-commerce businesses. The next industrial revolution related to Artificial Intelligence and GenAI has already arrived. It affects nearly all areas of the economy. In banking, digital transition predominantly serves as a driver of improvements in operational efficiency, data management, security and, above all, customer offerings. We want to be at the focal point of these changes. This year, BNP Paribas Bank offered customers behavioral protection and was the first in the market to deploy BaseModel.ai, a solution that enables the use of artificial intelligence in the development of state-of-the-art banking services. This is just one example of the banking sector's response to technological transition.

We saw clear confirmation in 2024 that by following this path, we attain our goals. BNP Paribas Bank is a leader in the areas we have picked as our priorities for this year. This is confirmed by the awards and recognition we obtained from international organizations.

We remain committed to the pursuit of sustainability. We support retail customers and businesses of all sizes. Sustainability is also about solutions for customers – consulting, measuring carbon footprint, supporting energy efficiency, propping up regenerative agriculture and encouraging green capital

investments. The goal is to improve the competitiveness of Polish companies while taking responsibility for the natural environment.

The bank's priority remains to keep raising the bar for customer experience – in sales channels, mobile banking, diversity of product offerings, attractive terms and conditions, operational efficiency and security. This year, BNP Paribas Bank became a laureate of the Polish Contact Center Awards. The jury recognized our use of Verint Automated Quality Management (AQM).

A year of hard work is behind us. I wish to thank the Management Board and all the bank's employees for their contribution to our outstanding performance. We have demonstrated that it is possible to combine social responsibility with business efficiency – we build our success by putting people in the center of our attention. We have once again been awarded the title of Top Employer, we support the development of talent, we invest in digital competencies, we bridge divides, including those based on gender differences (we have met the targets set by the EU Women on Boards Directive well ahead of time). Last but not least, we are committed to volunteerism initiatives and helping those most in need. These are the solid foundations on which we will continue to develop a flourishing and resilient organization in 2025.

Despite the uncertainties, I look to 2025 with optimism. Europe is undertaking a series of reforms. The EU Compass to regain competitiveness is a priority for Europe, expected to bring many positive changes to business. The Polish economy has a growth outlook ahead of it – a long-awaited reduction in inflation and, as a consequence, a decrease in interest rates, stronger investment and, hopefully, a stable regulatory environment.

In such circumstances, I believe that BNP Paribas Bank will grow organically while solidifying its market position. This will be a time of building shareholder value for the bank, continuing the path of digital transition and greater operational efficiency, emphasis on customer experience and social responsibility. It will also be a period of preparation for the new strategy for 2026-2030. There is no doubt in my mind that with the people who make up BNP Paribas Bank, we are in for another successful year.

Lucyna Stańczak-Wuczyńska

Chairwoman of the Supervisory Board of BNP Paribas Bank Polska



Letter from the President of the Management Board



Dear Shareholders, Customers and Employees of the BNP Paribas Bank Polska Group,

in times when the market environment gets more challenging, organizations undergo a verification of the robustness of their business foundation, flexibility to adapt quickly to change and a good growth strategy. For Bank BNP Paribas, 2024 was a challenging but successful year. It confirmed that we are on the right track and well prepared for new challenges.

The first dividend payment in the bank's history came as a significant corroboration of the maturity of our business model. It is our ambition to establish ourselves permanently among companies that reward their shareholders in a just manner.

In 2024, we generated a historically high net banking income of PLN 7.8 billion. Importantly, we recorded increases in core income categories. Our net profit was also higher than ever before, at PLN 2.4 billion. In a high-inflation environment, we are maintaining our operating expenses in check. The quality of our loan portfolio also remains very high.

Our financial performance is a consequence of shrewd decisions and thoughtful development of our offering. We focus staunchly on the development of sustainable financing, the total volume of which reached PLN 10.2 billion at the end of 2024.

Our priority remains the acquisition of new customers and continued improvement of their daily experience so that they think of Bank BNP Paribas as their bank of first choice. We are successfully rolling out new products and services – innovative and tailored to the needs of our customers. The development of our digital offering translates into an increasing use of remote channels, as demonstrated by the statistics on transactional activity and mobile banking usage.

We came out successful even though our operating environment was neither particularly favorable nor predictable. We are facing geopolitical instability, stagnation in Europe's key economies, low levels of investment in Poland and a number of internal factors that suppress the growth potential of the country's banking sector. On an industry-wide scale, the cost of provisions established for legal risk related to Swiss franc mortgage loans is already approaching PLN 90 billion. For Bank BNP Paribas, it has reached PLN 4.8 billion. The trend of liberating consumers of responsibility for their decisions and shifting all consequences of their actions to banks is now also being attempted by casting doubt on the reliability of WIBOR. In this case, however, key institutions and the Polish state have been taking a responsible stance on the matter. In addition to the issues mentioned above, the sector continues to face some of the heaviest tax and regulatory burdens in Europe.

I perceive the recurrence of Bank BNP Paribas' strong performance in these circumstances as a success and evidence of our business maturity. We are on target to meet our commitments – of both a financial and non-financial nature – as set forth in the GO beyond strategy. As recently as in the last quarter of 2024, we began work on a new strategy that will define our priorities for 2026–2030.

There is no doubt in my mind that the people in our organization are a key contributing factor to our success. Today, Bank BNP Paribas is an organization based on values that unite us and form the foundation of our growth. The conviction that our actions may translate into a favorable impact on the environment makes us actively support sustainable financing for our customers, engage intensively in volunteerism initiatives and effectively reduce inequalities. We reaffirmed the latter commitment by fulfilling in 2024, that is several years ahead of schedule, the requirements of the EU Directive on improving gender balance among the management of listed companies.

2025 will be a year full of challenges, some of which, especially those related to energy transition, defense and digitalization, are of strategic significance for our country. This notwithstanding, we are entering the current period with optimism. I do hope that the country's economy will accelerate in the coming quarters, while investment – owing in large part to unfrozen EU funds – will become its main driver. In this context, as an organization built on a solid foundation, one that is innovative and flexible, we will seize opportunities and maintain a robust rate of growth. It is my wish to see this growth – not only ours, but that of the whole sector – supported by wise decisions and the willingness of political actors to engage in dialogue. Given the scale of the challenges facing the Polish economy, the strength of banks will be essential for financing key projects..

Przemek Gdański

President of the Management Board, BNP Paribas Bank



Key data 2020-2024

	2024	2023	2022	2021	2020
Statement of financial data (PLN million)					
Total assets	167,540	161,026	150,109	131,777	119,577
Loans and advances to Customers*	85,854	86,248	88,631	86,299	75,637
Total equity	15,394	12,861	11,262	11,362	12,031
Amounts due to Customers	130,925	127,175	120,021	101,093	90,051
Statement of profit or loss (PLN million)					
Net profit	2,358	1,013	441	176	733
Normalised net profit**	2,415	967	1,166	176	721
Net interest income	5,741	5,225	3,493	3,141	3,060
Net fee and commission income	1,264	1,211	1,137	1,049	916
Net income on banking activity	7,753	7,283	5,352	4,809	4,705
Result on legal risk related to foreign currency loans	(796)	(1,978)	(740)	(1,045)	(168)
Result on derecognition of financial assets measured at amortised cost due to significant modification	(246)	(34)	(275)	(266)	(601)
General administrative expenses, depreciation and amortisation	(3,352)	(3,096)	(3,038)	(2,544)	(2,506)
Financial indicators (%)					
Net ROE	16.9%	8.2%	3.9%	1.5%	6.3%
Net ROA	1.5%	0.7%	0.3%	0.1%	0.6%
Costs/Income (C/I)	43.2%	42.5%	56.8%	52.9%	53.3%
Normalised net ROE**	17.3%	7.7%	10.2%	1.5%	6.2%
Normalised net ROA**	1.5%	0.6%	0.8%	0.1%	0.6%
Normalised Cost / Income (C/I) without BFG and IPS**	41.0%	41.1%	42.9%	49.9%	49.0%

	2024	2023	2022	2021	2020
Net interest margin	3.56%	3.43%	2.46%	2.51%	2.63%
Share of NPLs in gross loans and advances portfolio***	3.2%	3.0%	3.3%	3.6%	5.4%
Cost of risk	(0.28%)	(0.04%)	(0.30%)	(0.32%)	(0.78%)
Total capital ratio	17.20%	16.67%	15.55%	16.91%	18.65%
Tier I capital ratio	13.80%	12.51%	11.28%	12.33%	13.55%
Information on shares					
Stock market capitalisation (PLN million)	12,593	12,641	8,265	13,454	9,376
Number of shares (million pcs.)	148	148	148	148	147
Period-end share price (PLN)	85	86	56	91	64
Business information (thousand)****					
Number of Bank's Customers:	4,001	4,186	4,227	4,117	3,938
Retail Customers	3,638	3,831	3,877	3,810	3,639
Institutional Customers	363	356	350	307	299
ESG					
Value of sustainable financing (PLN billion)	10.2	9.6	6.5	3.1	1.0
Number of active employees in the Group	7,512	7,740	8,020	8,048	8,295
Number of Customer Centres with 'Barrier-Free Facility' certification	143	131	103	77	51

Note: due to the change made from 1 January 2023, in accordance with IFRS 9, in the presentation of the impact of legal risk arising from court proceedings related to CHF mortgage loans, in the case of the Net Assets category, Loans and advances granted to Customers and Share of loans and advances with loss of value (Stage 3), the column for 2022 presents converted values. For indicators for which we use quarterly averages, the converted amounts were adopted for all quarters of 2023. No recalculation of average values was made for previous years. Average values were not recalculated for earlier years. Details of the definitions and assumptions used are presented in the Alternative Performance Measures chapter.

* Net values, including loans measured at amortised cost and at fair value.

** Normalised values calculated without the impact of credit holidays in 2022, 2023, 2024 and integration costs incurred in connection with the implementation of merger processes in 2020.

*** Refers to the portfolio measured at amortised cost. NPL - a category defined as loans and advances in Stage 3 and POCI non-performing as presented in the note to the Consolidated Financial Statements

**** Number of Customers 2022 presented in accordance with the new definition adopted 2Q 2023.



About us

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The Group and the Bank characteristics

BNP Paribas Bank Polska S.A. (the Bank) is a universal bank.

Retail Customers are offered a selection of savings and investment products as well as a wide range of loans, including housing and Customer loans. For private banking segment Customers, we propose a comprehensive offer in the area of protection, optimisation and growth of wealth. The Bank's Customers can also take advantage of investment advisory services.

We provide micro, small and medium-sized enterprises as well as corporations with local and international financing solutions. Our services are also addressed to enterprises from the agri-food sector. We specialize in financing agriculture, the food economy and regional infrastructure.

We have been active in the Polish market for over a hundred years. Our ties with the global BNP Paribas financial group enable us to apply the best international practices. Thus, we can meet the needs of the local market and the expectations of the Bank's Customers. We provide our services all over the country through a network of Bank branches, partner branches, as well as online and mobile banking. We also cooperate with partner stores and selected car dealers.

As the Bank of Green Changes, we support our Customers' transition to a low-carbon economy and inspire them to make responsible financial decisions. We consistently pursue a strategy of financing investments with a positive social, economic, and environmental impact.

The Bank is part of the international BNP Paribas banking group (BNP Paribas Group).

The Bank and its subsidiaries form the BNP Paribas Bank Polska S.A. Group (the Group), which ranks sixth regarding balance sheet size in the domestic banking sector. Employment in the Group expressed in active FTEs is – 7.5 thousand.

The BNP Paribas Bank Polska Group operates on the basis of operating segments (in %, the business line's share of the Group's banking result, NBI, for the 12 months of 2024 is given):

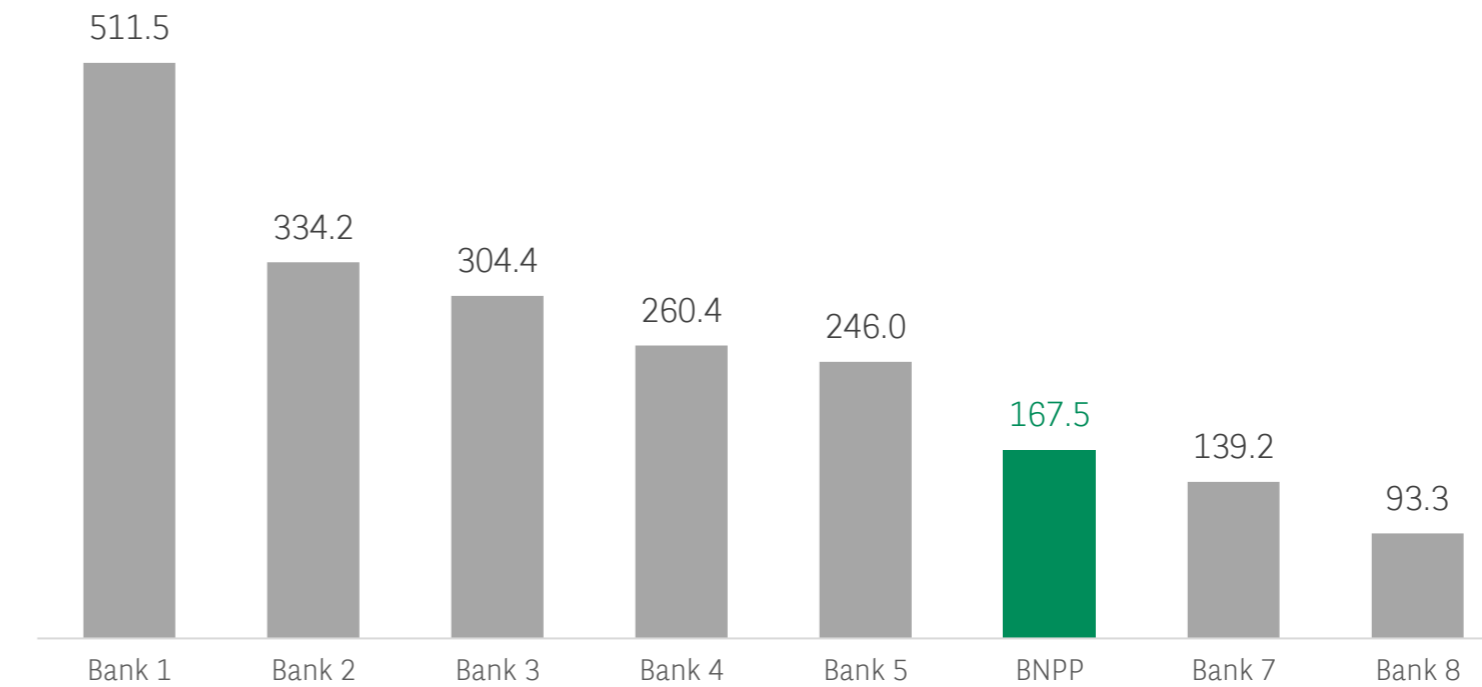
- Retail and Business Banking - serves retail Customers - including private banking Customers (Wealth Management) and business Customers - including micro-enterprises. The largest share of NBI - 50.0%,
- Corporate Banking - offers a wide range of financial services to large and medium-sized enterprises, local authorities and entities that are part of international groups. Share in NBI - 29.9%,
- Small and Medium Enterprise Banking - serves Agro and non-Agro Customers. Share of NBI - 10.7%,
- Corporate and Institutional Banking (CIB) - supports the sale of Group products to Polish companies and serves strategic Customers. Share in NBI - 5.2%,
- Other banking activities are those of the Asset and Liability Management Division and the Corporate Centre. Share of NBI - 4.2%.

The Bank's head office is located in Warsaw, at 2 Marcina Kasprzaka Street.

The shares of BNP Paribas Bank Polska S.A. are listed on the Warsaw Stock Exchange.

The Bank and Group's position in the Polish banking sector and market shares

Chart 1. Total assets of the BNP Paribas Bank Polska S.A. Group on 31 December 2024 compared to the largest banks (PLN billion)



According to the interim reports, which were the most up-to-date source of comparable performance information for the banks listed on the WSE at the date the Management Report was approved for publication, BNP Paribas Bank Polska S.A. Group was the sixth largest banking group in Poland in terms of total assets.

**Table 1. Market shares of BNP Paribas Bank Polska**

	31.12.2024	31.12.2023
Loans to non-Bank Customers including, i.a.:	5.7%	6.1%
Loans for retail Customers	4.8%	5.3%
Non-financial business entities	8.8%	9.3%
Deposits from non-Bank Customer including, i.a.:	5.7%	6.0%
Deposits from retail Customers	4.4%	4.5%
Non-financial business entities	9.3%	9.9%

In the 'loans to non-Bank Customers' category, the Bank's share in the sector stood at the end of 2024 5.7%, compared with 6.1% at the end of 2023. Market shares fell in both the loans to retail Customers and loans to non-financial businesses categories. The lower market shares for retail Customers were due in particular to a decline in the share of PLN housing loans. This occurred as a consequence of the decline in the Bank's volumes in the face of their marked increase observed in the banking sector (in 2023 Bank adopted a more conservative and selective housing lending policy and did not join the government's 'Safe Credit 2%' programme to support the purchase of the first flat). In Q2 2024, the Bank relaxed its lending policy for housing loans, which had the effect of gradually slowing the decline in market shares in this market segment. The decline in market shares in loans to non-financial business entities occurred as a result of a decrease in volumes at the Bank against an increase in the banking sector.

The Bank's share of 'non-Bank Customer deposits' decreased to 5.7% from 6.0% at the end of 2023. This was determined by a significant decrease in the Bank's share of non-Bank business deposits. The Bank's share in deposits from retail Customers remained at a similar level (down 3 basis points) to that recorded at the end of 2023, although the structure of deposits from this group of Customers changed noticeably, with current deposits becoming increasingly important.

Group structure and subsidiaries subject to consolidation

BNP Paribas Bank Polska S.A. (the Bank) is the parent company of the BNP Paribas Bank Polska Group (the Group) operating in Poland. The subsidiaries that are part of the Group at the end of December 2024 (fully consolidated) are listed below. The Bank's share in the equity of each subsidiary is presented in percentages:

Structure of BNP Paribas Bank Polska S.A. as of 31.12.2024

Changes in Group structure in 2024:

- On 2 January 2024, the Extraordinary General Meeting of Shareholders of Campus Leszno Sp. z o.o. passed a resolution to dissolve the company and open its liquidation. The company ended its operational activities on 31 October 2023.
- On 22 November 2024, the Extraordinary General Meeting of Shareholders of Campus Leszno Sp. z o.o. passed a resolution to terminate the company's liquidation.

In addition to Group companies, the Bank held equity investments in infrastructure companies at the end of December 2024, including Credit Information Bureau S.A., National Clearing House S.A., VISA Inc., Mastercard Inc. and SWIFT. We also held minority, non-controlling interests, shares or convertible bonds in over a dozen medium-sized Polish companies. The value of investments in shares and minority interests is not material in terms of the scale of the Bank's and the Group's business and financial performance. These investments are financed from own resources.

All transactions between the Bank and related entities resulted from ongoing operational activities and mainly included loans, deposits, derivative transactions, income, expenses from advisory services and financial intermediation. Detailed information on transactions with related parties is provided in Note 51 of the Consolidated Financial Statements of the BNP Paribas Group Bank Polska S.A. for the year ended 31 December 2024.



BNP Paribas Group worldwide

The Bank's strategic shareholder is the leading international banking group, BNP Paribas, which operates in three key areas:

- Corporate & Institutional Banking - services for corporate and institutional Customers,
- Commercial, Personal Banking & Services - services provided by the sales network and specialized business units,
- Investment & Protection Services - savings, investment and insurance services.

The BNP Paribas Group supports its retail Customers, entrepreneurs, local governments, small and medium-sized enterprises, corporates and institutions in the implementation of projects by offering them a range of financial, investment, savings and insurance products.

BNP Paribas Group operates in 63 countries and employs almost 183 thousand people, including 146 thousand in Europe.

In 2022, the Group began implementing the GTS strategic plan for 2022-2025. The strategy is built on three pillars - growth technology, and sustainability.

BNP Paribas Group's TSG strategy ambitions:

- GROWTH – further development of a profitable business based on leading position of the BNP Paribas Group's in Europe,
- TECHNOLOGY – technology supporting Customer experience and operational efficiency,
- SUSTAINABILITY – the Group's business activities on supporting the financing of sustainable development.

The Bank on the Warsaw Stock Exchange

Shareholding structure

31 December 2024, the Bank's shareholders included two shareholders holding at least 5% of the total number of votes at the General Meeting: BNP Paribas and BNP Paribas Fortis SA/NV. In total, they held 81.28% of the votes. The remainder of the Bank's shares, i.e. 18.72% were in free float).

The Bank's shares are listed on the Main Market of the Warsaw Stock Exchange since 27 May 2011 (the debut of Bank Gospodarki Żywnościowej S.A.).

PLBGZ0000010

ISIN code

BNP

WSE Ticker

BNPPPL

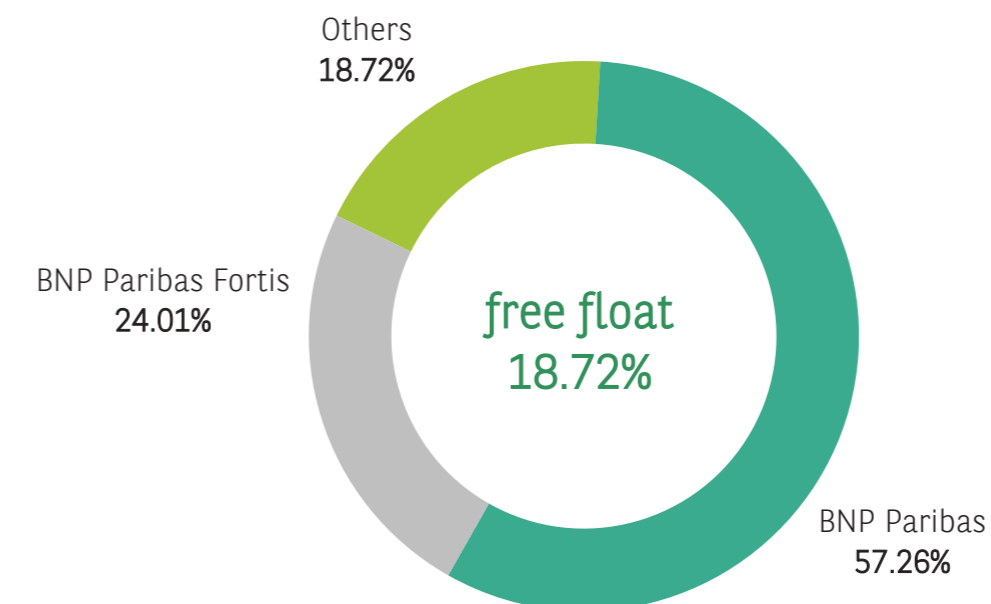
Abbreviation

mWIG40 i mWIG40TR

Index membership

Chart 2. Shareholder structure as of 31.12.2024

Total number of shares 147 799 870



Share quotations

After 2023, which brought a significant upturn for WSE-listed companies due to, among other things, attractive valuations against foreign competition, foreign capital inflows and relatively good macroeconomic data, the year 2024 was characterised by greater volatility and diversification of returns.

In the first half of 2024, the good performance of 2023 continued (the WIG-Banks rose by 24.9%), and the factors that positively influenced Bank share prices were:



- persistently high interest rates allowing the generation of high interest earnings and the narrative that interest rates will remain at current levels for an extended period,
- the inflow of funds into PPK and Polish equity funds, the unblocking of funds from KPO, as well as the observed improvement in sentiment among foreign investors,
- dividend payments by Banks,
- in addition, the announcement of further government subsidies for housing loans ('Credit to Start' programme).

In the second half of 2024, a deterioration in sentiment on the Bank stock market could be observed (WIG-Banks fell by 10.7%), caused by, among other things:

- continuing geopolitical risks in the region due to the war in Ukraine,
- the strengthening of the dollar and expectations regarding the outcome of the US presidential election and the new president's trade policy resulting in a weakening of foreign capital inflows to the Polish market,
- weaker-than-expected macroeconomic data, which translated into revisions of economic growth dynamics,
- concerns about interest rate cuts in Poland in 2025.

For the whole of 2024, the WIG-Banks index gained 11.6% (at the session of 30 December 2024, it was 12,345.94 points). The maximum for WIG-Banks was recorded on 23 April 2024 at 13,992.51 points and the minimum on 17 January 2024: 10,492.33 points.

In the session of 30 December 2024, the closing price of the Bank's shares was PLN 85.20, slightly lower (-0.5%) compared to 29 December 2023 (PLN 85.60). The minimum for the Bank's shares in 2024 was recorded on 17 January 2024 (PLN 81.0) and the maximum on 21 June 2024 (PLN 112.0).

The WIG-Banks rose by 22.3% in Q1 2024, while the Bank's share price rose by 27.3% to PLN 109.0. The Bank's shares recorded a maximum for Q1 2024 of PLN 110.5 on 21 and 22 March 2024 and a minimum on 17 January (PLN 81.0).

In Q2 2024, Bank share prices were affected by, among other things, the decision to extend the credit holiday to 2024. As a result, the WIG-Banks rose by only 2.2% in Q2 2024 and the Bank's share price fell by 7.3% to PLN 101.00. The minimum for the Bank's shares in Q2 2024 was recorded on 15 May 2024 (PLN 93.80) and the maximum on 21 June this year (PLN 112.0). The Bank's share price recorded a decline after 23 April 2024, which was the dividend day (in accordance with the resolution of the Bank's Annual General Meeting on the payment of dividends from the net profit made in 2023).

The absence of the government's new 'Start-Up Loan' programme, the continuing legal risk of the foreign currency mortgage portfolio, as well as interest rate cuts in Europe (ECB, Czech Republic, Hungary, Sweden and Switzerland) in September 2024 negatively impacted Bank share prices in Q3 2024. This was reflected in a 9.8% decline in the WIG-Banks and a 6.9% decline in Bank shares to PLN 94.0. The Bank's shares recorded a maximum for Q3 2024 at PLN 106.50 on 12 July 2024 and a minimum on 11 September 2024 (PLN 93.20).

After declines in Bank share prices in the first two months of Q4, there was a positive turnaround in December triggered by a lower risk of interest rate reductions in the first half of 2025 in Poland, projected credit growth, planned high dividend payments in 2025 and increasing inflows of funds to the WSE from Employee Capital Plans. The decline in the WIG-Banks index was negligible at 0.9% in Q4 2024, while the price of the Bank's shares fell by 9.4% to PLN 85.20. The minimum for the Bank's shares in Q4 2024 was recorded on 4 December 2024 (PLN 81.20) and the maximum on 18 and 21 October this year (PLN 95.80).

Chart 3. Quotations and trading value of the Bank's shares from 29.12.2023 to 30.12.2024

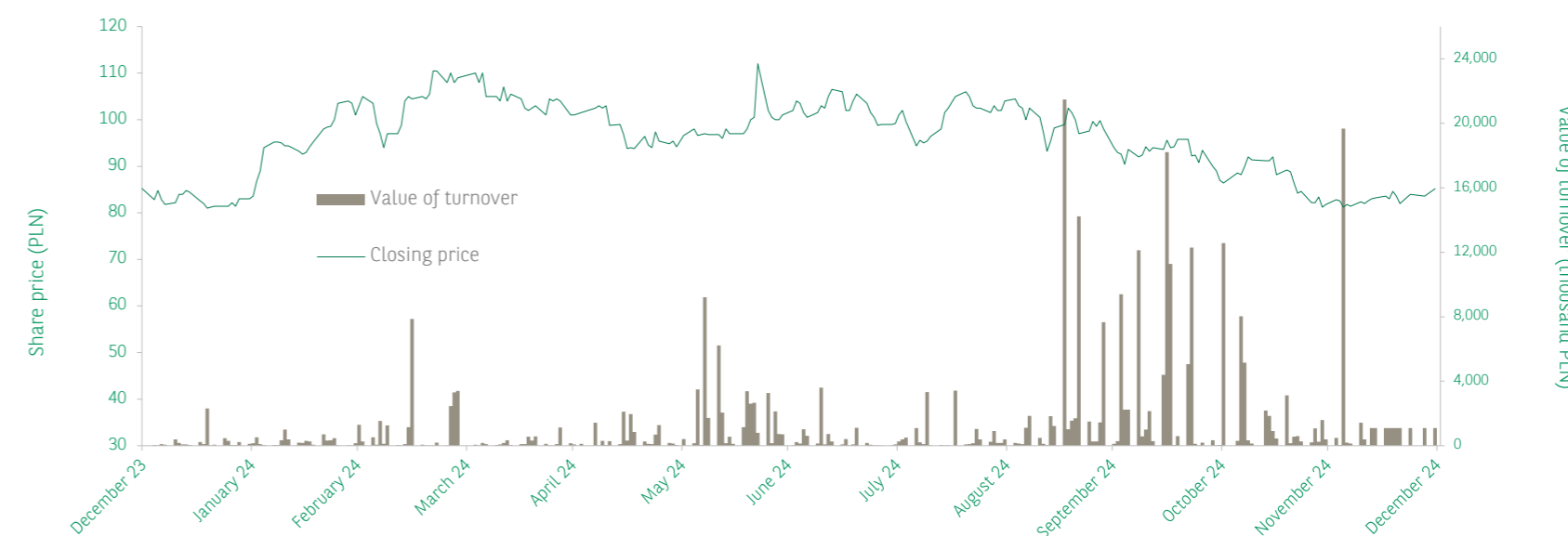
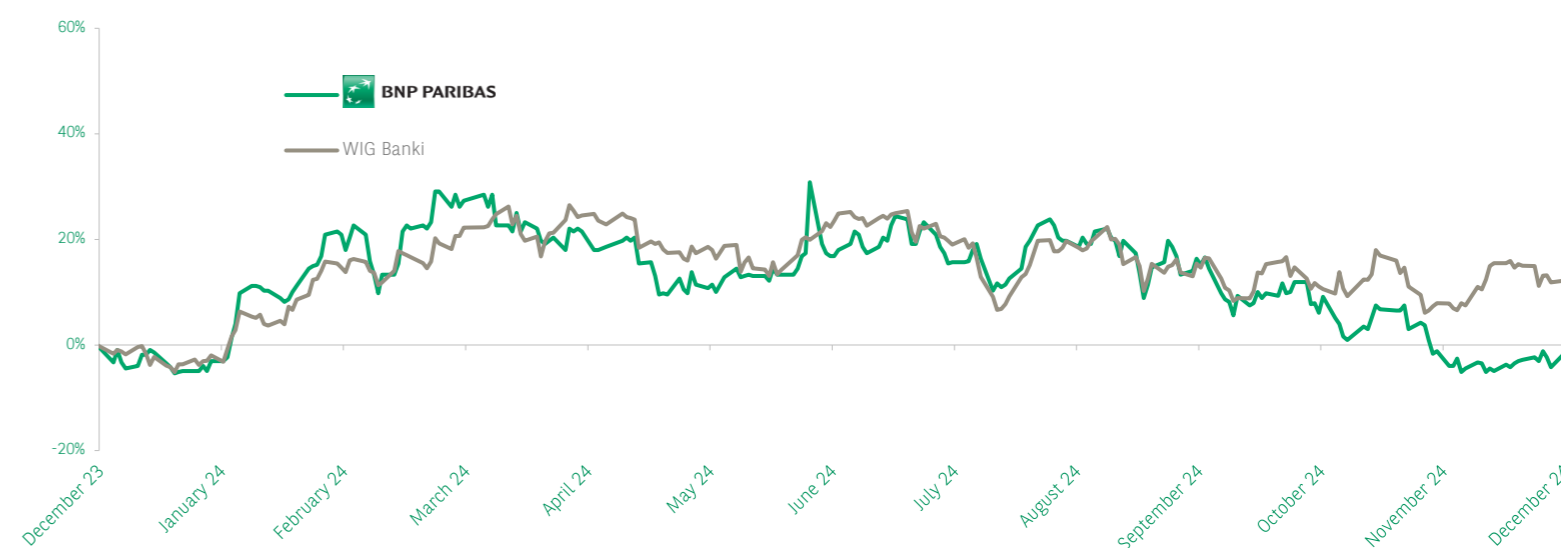


Chart 4. Change in the share price of the Bank vs. WIG-Banks from 29.12.2023 to 30.12.2024 (29.12.2023 = 100%)



In March 2024, as a result of the completion of the accelerated book-building process (ABB) for the sale of the Bank's shares by BNP Paribas SA, the percentage of the Bank's shares in free float (shareholders below 5% of shares and votes)



increased from 12.65% (31.12.2023) to 18.72% (30.06.2024). Following the quarterly review of the stock index portfolios carried out on 21 June 2024, the Bank's shares are listed in the mWIG 40 index.

The average daily share price for the following quarters of 2024 was: Q1: PLN 94.06, Q2: PLN 100.49; Q3: PLN 100.83; Q4: PLN 88.02.

The average daily trading volume was 12,550 shares in Q1 2024 and increased to 30,620 shares in Q2 2024 as the maximum trading volume was recorded on 21 June 2024: 247,283 shares. From Q3 onwards, the average trading volume decreased and amounted to 10,039 shares and 6,306 shares in Q3 and Q4 respectively. In 2024, the average daily trading volume was 42.98% higher compared to 2023 (14,890 shares versus 10,414 shares).

Combined with a slight decrease in the share price, this was reflected in changes in the average daily trading value, which in the quarters under review amounted to, respectively: PLN 1,254.0 thousand, PLN 3,106.7 thousand, PLN 1,020.5 thousand and PLN 540.1 thousand. The session of 21 June 2024 recorded the maximum trading volume (247,283 shares) and the maximum trading value (PLN 26,332.57 thousand) for the analysed period.

Table 2. Key information on BNP Paribas Bank Polska S.A. shares

	2024	2023	2022	change 2024/2023
Share price at end of the year (PLN)	85.20	85.60	56.00	(0.5%)
Average share price (PLN)	95.88	59.82	62.92	60.3%
Maximum share price (PLN)	112.00	86.20	97.00	29.9%
Minimum share price (PLN)	81.00	46.80	46.70	73.1%
WIG-Banks value at year-end (points)	12,345.94	11,062.01	6,251.97	11.6%
Number of shares at year end (units)	147,799,870	147,676,946	147,593,150	0.1%
Capitalisation at year-end (PLN thousand)	12,592,549	12,641,147	8,265,216	(0.4%)
Average trading volume per session (units)	14,889.66	10,413.86	6,518.24	43.0%
Average value of trading per session (PLN thousand)	1,482.14	633.00	420.87	134.1%
Earnings per share (PLN)*	15.96	6.86	2.99	132.6%
P/E ratio*	5.34	12.48	18.72	(57.2%)
Book value per share (PLN)*	104.15	87.09	76.31	19.6%
P/BV ratio*	0.82	0.98	0.73	(16.3%)

* calculation based on consolidated data

Ratings

At the end of 2024, the Bank had a rating from the rating agency Fitch Ratings (commissioned by the Bank). The history of rating changes assigned by the agency can be found on the Bank's page: <https://www.bnpparibas.pl/en/investor-relations/about-the-bank/ratings>.

The last rating update took place in November 2024. The Bank's credit ratings confirmed in the Fitch Ratings communication of 20 November 2024 are presented below:

Fitch Ratings	Rating
Long-Term Issuer Default Rating (LT IDR)	"A+" with a stable outlook
Short-Term Issuer Default Rating (ST IDR)	"F1"
National Long-Term Rating (Natl LT)	"AAA(pol)" with a stable outlook
National Short-Term Rating (Natl ST)	"F1+(pol)"
Viability Rating (VR)	"bbb-"
Shareholder Support Rating (SSR)	"a+"

The Bank's IDR and SSR ratings reflect Fitch Ratings' belief in the potential support of the Bank's parent company, BNP Paribas S.A. (BNPP, IDR of 'A+', outlook stable). According to Fitch Ratings, the Bank's VR rating of 'bbb-' reflects the Bank's moderate franchise in the competitive Polish banking market, as well as its traditional, well-balanced business model.

Investor Relations

The Bank pursues a transparent information policy aimed at guaranteeing high communication standards that take into account the information needs of capital market participants.

The Bank, as a public company and a supervised institution, follows the principles of corporate governance when providing information, in compliance with the applicable laws and regulations, and ensures that participants in the capital market have equal access to information on the company's current operations, activities undertaken by the company or financial results, by fulfilling information obligations in a manner that allows a fair valuation of the Bank's shares.

Relations with shareholders, investors and other participants of the capital market are managed by a dedicated organisational unit at the Bank: Investor Relations Team. Important information for investors, the Bank's shareholders and analysts is available on the Investor Relations website <https://www.bnpparibas.pl/en/investor-relations>.

In 2024, the Bank made the digital version of the annual report available for the fifth time. The report for 2023 is available at: <https://raportroczny.bnpparibas.pl/en/>.

At the end of February 2025 the Bank had 7 recommendations from financial institutions, all "Buy" ("Ootperform", "Accumulate"). The median target price from the recommendations was PLN 114.2 and the average target price was PLN 113.9; these were 17.0% and 16.7% higher than the share price as at 28 February 2025 (PLN 97.6) respectively.



Key events in 2024

Key corporate events

January 2024

- **2.01 - Extraordinary General Meeting of Shareholders of Campus Leszno Sp. z o.o.** - resolution on dissolution of the company and opening of its liquidation.
On 22.11.2024, the Extraordinary General Meeting of Shareholders of Campus Leszno Sp. z o.o. passed a resolution to terminate the company's liquidation.

February 2024

- **29.02 - Appointment of the Management Board of BNP Paribas Bank Polska S.A. for a new term**

March 2024

- **13.03 - Accelerated book building process (ABB)**

Notices from the shareholder of BNP Paribas Bank Polska S.A. (Bank) - BNP Paribas SA (Shareholder) – about: (i) the commencement of the process of selling some of its shares in the Bank under an accelerated bookbuilding process, (ii) completion of the ABB process.

20 March 2024 – information from a Shareholder about a change in his share of the total number of votes in the Bank. As a result of the settlement of block transactions concluded on 14 March 2024 in connection with the completion of the ABB process concerning 8,860,616 Bank shares and the settlement of other transactions made on the regulated market concerning 6,545 Bank shares, BNP Paribas SA's share in the total number of votes at the Bank's General Meeting of Shareholders decreased by approximately 6%.

As a result of the settlement of the transaction, as of the date of the notification, BNP Paribas SA directly holds 84,634,166 shares in the Bank representing approximately 57.31% of the Bank's share capital and the total number of votes at the General Meeting of Shareholders, and together with its subsidiary BNP Paribas Fortis SA/NV holds a total of 120,124,392 shares in the Bank representing approximately 81.34% of the Bank's share capital and total votes at the Bank's General Meeting of Shareholders.

March 2024

- **28.03 - Conclusion of a synthetic securitisation transaction** on a portfolio of corporate loans/advances with a total value of PLN 2,180 million (as of 31 December 2023) (the Transaction) with International Finance Corporation (IFC)

The main purpose of the Transaction is to release capital for the Bank to finance climate change mitigation projects. As part of the Transaction, the Bank transferred to IFC a significant portion of the credit risk from the selected securitised portfolio. The selected securitised loan portfolio remains on the Bank's balance sheet. The termination date of the Transaction according to the agreement is 31 December 2031. The risk transfer of the securitised portfolio is implemented through a credit protection instrument in the form of a financial guarantee of up to PLN 218 million issued by the IFC. The Transaction complies with the material risk transfer requirements of the CRR Regulation and was structured as meeting the STS criteria (simple, transparent and standard securitisation) under Regulation 2021/557. BNP Paribas SA performed the role of arranger of the Transaction.



April 2024

- **3.04. - Statement of the National Securities Depository S.A. (KDPW)** on the conditional registration in the securities depository maintained by the NDS of up to 1,200,000 Series N ordinary bearer shares of BNP Paribas Bank Polska S.A. with a nominal value of PLN 1 each.

Resolution of the Warsaw Stock Exchange S.A. (WSE) concerning the admission and the introduction to exchange trading on the WSE Main List of up to 1,200,000 series N bearer ordinary shares of BNP Paribas Bank Polska S.A. of the nominal value of PLN 1 each.

April 2024

- **5.04. - Issue of series M and series N shares under conditional share capital increase and change in the value of share capital of BNP Paribas Bank Polska S.A.**

In accordance with the relevant statements of the National Securities Depository S.A. (KDPW) and resolutions of the Management Board of the Warsaw Stock Exchange S.A. (WSE) - current report of the Bank No. 16/2024 - registration with the KDPW and admission to trading on the WSE:

- 44,608 ordinary bearer shares of the Bank, series M (Series M Shares) with a nominal value of PLN 1 each, and the recording of these shares in the securities accounts of the entitled persons,
- 78,316 ordinary bearer shares of the Bank, series N (Series N Shares) with a nominal value of PLN 1 each, and the recording of these shares in the securities accounts of the entitled persons.

Series M Shares were issued as part of a conditional increase in the Bank's share capital on the basis of Resolution No. 5 of the Bank's Extraordinary General Meeting of 31 January 2020, as amended by Resolution No. 37 of the Bank's Annual General Meeting of 29 June 2020. The Series M Shares were subscribed for in exercise of the rights under Series A4 registered subscription warrants subscribed for earlier, each of which entitled to subscribe for one Series M Share.

The Series N Shares were issued as part of a conditional increase in the Bank's share capital pursuant to Resolution 39 of the Bank's General Meeting of Shareholders of 27 June 2022. The Series N Shares were taken up in exercise of the rights under Series B1 registered subscription warrants taken up earlier, each of which entitled to take up one Series N Share.

In accordance with the second sentence of Article 451 § 2 of the Code of Commercial Partnerships and Companies, the allotment of Series M Shares and Series N Shares became effective upon their entry in the securities accounts of the eligible persons.

Consequently, pursuant to Article 451 § 2 in conjunction with Article 452 § 1 of the Code of Commercial Partnerships and Companies, the rights from:

- 44,608 Series M Shares with a nominal value of PLN 44,608,
- 78,316 Series N Shares with a nominal value of PLN 78,316,

i.e. a total of 122,924 shares in the Bank with a total nominal value of PLN 122,924 and an increase in the Bank's share capital from PLN 147,676,946 to PLN 147,799,870, which is divided into 147,799,870 shares with a nominal value of PLN 1 each.

April 2024

- **16.04. - General Meeting of Shareholders of BNP Paribas Bank Polska S.A..**

Adoption of a resolution on, i.a., the payment of a dividend for 2023 in the amount of PLN 503,997,556.70, i.e. PLN 3.41 per share. The dividend covers all shares issued by the Bank, i.e. 147,799,870 shares. Dividend date: 23 April 2024, dividend payment date: 10 May 2024.

May 2024

- **14.05 - Registration of the amendments to the Statute of BNP Paribas Bank Polska S.A. in the National Court Register** i.e., an increase in the Bank's share capital to PLN 147,799,870 as a result of the entitled persons taking up the Series M and Series N shares on the terms specified in § 29a para. 2 point d) and § 29b para. 2 point a) of the Statute of BNP Paribas Bank Polska S.A.

June 2024

- **3.06 - Minimum level of own funds and eligible liabilities (MREL) set for BNP Paribas Bank Polska S.A.**

The MREL requirement for the Bank was set at an individual level at 16.02% of the Total Risk Exposure Amount (TREA) and 5.91% of the Total Exposure Measure (TEM). The Bank was required to comply with the requirement immediately upon receipt of the information. As of the date of receipt of the BFG's letter, the Bank was in compliance with the MREL requirements as set out in the letter.

- **18.06 - Registration of amendments to the Bank's Statutes of BNP Paribas Bank Polska S.A. in the National Court Register** adopted by the General Meeting of Shareholders on 16 April 2024.



July 2024

- **2.07.** - Extraordinary General Meeting of Shareholders – topics taken up, including changes to the composition of the Bank's Supervisory Board, are presented in the Corporate Governance chapter, in the section Statutory Bodies of the Bank

August 2024

- **26.08.** - Entry into the National Court Register of the amendments to the Articles of Association of BNP Paribas Bank Polska S.A. adopted at the Extraordinary General Meeting of BNP Paribas Bank Polska S.A. 2 July 2024.

September 2024

- **17.09.** - Request from the Polish Financial Supervision Authority (PFSA) for the Financial Stability Committee to provide an opinion on the determination for the Bank of the amount of the Other Systemically Important Institution (O-SII) buffer, the adequate amount of which, according to the principles resulting from the methodology established by the PFSA, should be set at an amount equivalent to 0.5% of the total amount of risk exposure. The current O-SII buffer is set for the Bank at an amount equivalent to 0.25% of the total risk exposure amount.

November 2024

- **22.11.** - Obtaining corporate approvals required for the issuance of Tier 1 Additional Instruments (AT1)

The Bank's Supervisory Board adopted a resolution to approve the issue of capital bonds referred to in Article 27a of the Bond Act of 15 January 2015 in Polish zlotys ("PLN Capital Bonds").

The PLN Capital Bonds will be instruments without a fixed maturity date, entitling the Bank to receive interest for an indefinite period of time, subject to the Bank being able to redeem them early under the terms and conditions of the issue.

The total nominal value of the issue of the PLN Capital Bonds will not exceed PLN 650,000,000 and the nominal value of one PLN Capital Bond will be PLN 500,000. The interest rate will be determined on market terms, based on the reference rate Wibor 3M and a margin. The PLN Capital Notes will be acquired exclusively by BNP Paribas S.A., based in Paris.

The PLN Capital Bonds will be classified in the Bank's own funds as additional instruments in Tier 1 capital after the Bank has obtained the relevant approval from the PFSA. The Supervisory Board's approval is required in connection with Article 27m of the Bond Act of 15 January 2015.

- **28.11.** - Issuance of additional Tier 1 (AT1) instruments

The Bank issued the capital bonds referred to in Article 27a of the Bond Act of 15 January 2015 (the "Capital Bonds"), which were acquired by BNP Paribas SA, Paris, on 28 November 2024, for the value and under the conditions set out in the resolution of the Supervisory Board of 22 November 2024.

The terms and conditions of issue of the Capital Notes do not provide for conversion into shares of the Bank, but only for redemption in the form of an interim write-down.

With the approval of the PFSA on 31 December 2024, the Capital Bonds were classified as additional instruments in Tier 1 capital.

December 2024

- **6.12.** - Decision of the Financial Supervision Authority on the determination of the amount of Other Systemically Important Institution ("O-SII") buffer to be imposed on the Bank, in an amount equivalent to 0.50% of the total risk exposure amount calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012 (OJ EU L 176 of 27 June 2013 as amended).

The O-SII buffer previously in place for the Bank was 0.25% of total risk exposure.

- **17.12.** - The Financial Supervision Authority did not designate an additional capital charge for BNP Paribas Bank Polska S.A. under Pillar II (P2G) to absorb potential losses arising from stress events.

The Bank's sensitivity to the possible materialisation of stress scenarios affecting the level of own funds and risk exposure was assessed as low.

The changes to the composition of the Bank's Supervisory Board in 2024 are described in Chapter: Corporate Governance, under section: [Statutory Bodies of the Bank](#).



Prizes and awards

January 2024

- The Bank was recognised by the rating agency **Sustainalytics** as an outstanding company in terms of ESG management across Europe, receiving the titles '**Regional Top Rated**' and '**Industry Top Rated**'. The Bank was also ranked among the best banks worldwide in this respect and maintained its position as the best ranked bank in Poland.
- The Bank was awarded the **Top Employer Poland** certificate for the eleventh time, which confirms the highest standards in the area of human resources management in force in the organisation.
- The team representing BNP Paribas Bank Polska was ranked 2nd best economist team 2023 in the Parkiet forecasting competition.
- The Bank's team of economists has been awarded by **LSEG's StarMine Awards for Most Accurate Forecasters**, a competition for the most accurate economic forecasts organised by Reuters. Economists representing BNP Paribas Bank Poland won 1st place in the „Poland" category for their 2023 forecasts.

February 2024

- The international financial magazines **Global Finance** and **The Digital Banker** have named BNP Paribas Bank Polska as the best Bank for small and medium-sized enterprises in Poland in the **Best SME Bank Awards 2024** and the best bank for medium-sized enterprises in Central Europe in the **Global SME Banking Innovation Awards 2024**.

March 2024

- The Bank won in two categories of the **Institution of the Year** project organised by MojeBankowanie.pl: Best account opening process in a branch and Best personal banking.
- The Bank was awarded the **title of Ethical Company** in the Puls Biznesu competition and was among a small group of nine companies awarded this title.

April 2024

- BNP Paribas Foundation was awarded in the **Diversity Charter** competition, organised by the **Responsible Business Forum**, for its educational partnership programme 'Knowledge to Power'.

May 2024

- The Bank was the winner of the **Polish Contact Centre Awards**. It won in the '**Best Organisational Improvement**' category, recognising the use of Verint Automated Quality Management (AQM) in the process of improving the competence of consultants (contact centre, remote sales, telephone debt collection). The Bank was also recognised in the '**Best Supporting Technology**' category for its programme to match the communication methods of telephone consultants to the conversational styles of Customers using advanced data analytics and artificial intelligence.
- For the sixth time in a row, the Bank has been shortlisted for the **Diversity IN Check** (previous name D&I Rating), which recognises the most advanced employers in diversity and inclusion management in Poland. Among the qualified 54 organisations - 8, including BNP Paribas Bank Polska, achieved a perfect score, exceeding 80% of the possible points.
- Bank among the winners of the Sustainable Economy Diamonds 2024 competition with the title of **Sustainable Finance Leader**.

June 2024

- The Bank has been named **Best International Private Bank in Poland** for the fourth time at the prestigious **Global Private Banking Innovation Awards 2024**, an accolade awarded by The Global Private Banker and The Digital Banker - providers of news, business analysis and research for the global financial services industry.
- The Bank won three awards at the 10th edition of the **Stars of Banking** competition organised by Dziennik Gazeta Prawna: 1st place in the ESG Star category, 2nd place in the Technology and Innovation Star category and 3rd place in the main category - Star of Banking.
- The Bank was ranked 2nd overall in the 18th edition of the "**ESG Ranking. Responsible Management**" (formerly the Responsible Companies Ranking), being also the best ranked Bank in the list.
- The Bank received the **Grand Prize in the Age category** in the 2nd edition of the **Polish Diversity Awards** organised by My Company Poland. It was also nominated in the Neurodiversity category.
- The Bank won **1st place in the ranking of financial institutions that care about professional and social equality for LGBT+ people** organised by the Cashless for Equality project, scoring the maximum number of points.
- The BNP Paribas Foundation was awarded the title '**Benefactor of the Year**' in the '**Openness to Diversity**' category for its commitment to the tutor/scholarship programme, 'Knowledge to Power', which it has been running for six years together with the Ocalenie Foundation.



July 2024

- The Bank received the **main award in the wellbeing and work-life balance category for the GOOD programme** in the large organisation segment, as part of the Pracuj.pl portal's HR Dream Team 2024 competition.

September 2024

- **My Premium Account** retained its leading position and won **1st place** for the fifth consecutive year in the **ranking of the best premium accounts** for the most demanding Customers, which is published by Bankier.pl.
- The Bank was awarded the title of **Trustworthy Brand 2024** in the category 'The future of the planet, or a company that shows that ESG reporting does not have to be difficult'. The competition was organised for the ninth time by My Company Media, publisher of the monthly magazine My Company Polska.
- The Bank was awarded the **Grand Prix 30 Years of the CCIFP**- a distinction on the occasion of the 30th anniversary of the establishment of the French-Polish Chamber of Commerce - to the company that has worked with the Chamber for the longest time and jointly developed Polish-French economic relations.
- The Bank's **#INFLUENCERS** project won recognition from the jury of **the Club of Advertising Creators 2024** (Poland's largest creativity competition) and received as many as **11 statuettes** (KTR swords), including five in gold.

October 2024

- The Bank received an award at the international **Global Retail Banking Innovation Awards**, in the category '**Best Application of AI**'. The judging panel highlighted the exceptional level of personalisation of the products and services offered by the Bank.
- The Bank won the Qorus Infosys Finacle 2024 silver award in the **Business Model Transformation** category for implementing an ecosystem of ESG financing and green transformation solutions.
- For the sixth time, the Bank's annual report has won an accolade in **The Best Annual Report** competition of the Institute of Accounting and Taxation, in the "**Banks and Financial Institutions**" category. This is the third time in a row that the Bank has received the top award, confirming that it produces transparent and valuable reports.
- The Bank's **#INFLUENCERS** project won the **Bronze Drum** at the jubilee 30th Golden Drum international Festival of Creativity.

November 2024

- The Bank came 5th in the **Top Brand 2024** ranking in the Banks category.
- The Bank was ranked 3rd in the **Premium Customer Ranking** by Forbes magazine. However, in the **Company Friendly Bank Ranking**, the Bank was ranked 4th. The Bank was also included in **Newsweek's Friendly Bank** ranking.
- At the **IAB Mixx Awards 2024**, the Bank was awarded two prizes for its **#INFLUENCERS** action - silver in the **Offline Digitizing** category and bronze in the **Innovation Solutions** category.
- The Bank was the winner of the **Digital Excellence Awards 2024** in the category of **Transformational Capabilities**, an award given for successfully leading the transformation of the working model in the New Technology and Cybersecurity Area. It was also recognised for building a strong, competent and committed IT team that effectively supports the business in addressing changing needs and market conditions.
- The Bank took 2nd place as **Advertiser of the Year** in the **Commercial Innovation 2024** competition, and also won gold and silver for the **#INFLUENCERS** campaign and silver in the **Marketing Master by SAR** category (for performance in the areas of efficiency, creativity and innovation).

December 2024

- The Bank received the **Polish Vehicle Rental and Leasing Association's** Eko Flota award in the 'Most Environmentally Friendly Fleet' category.
- The Bank was awarded as part of the prestigious **Złote spinacze 2024** competition, in four categories: **Research&Insight** – Złoty Spinacz and **ESG, Sustainability and CSR Communications** – Srebrny Spinacz for the **#INFLUENCERS** campaign, **Employer Branding** – Srebrny Spinacz for the **#UNEXPECTEDJOBS** campaign and **Finance** – Brązowy Spinacz for the **#INFLUENCERS** campaign.



The Bank in its environment

- 18** Macroeconomic situation
- 20** Performance of the banking sector
- 23** Stock market and investment situation

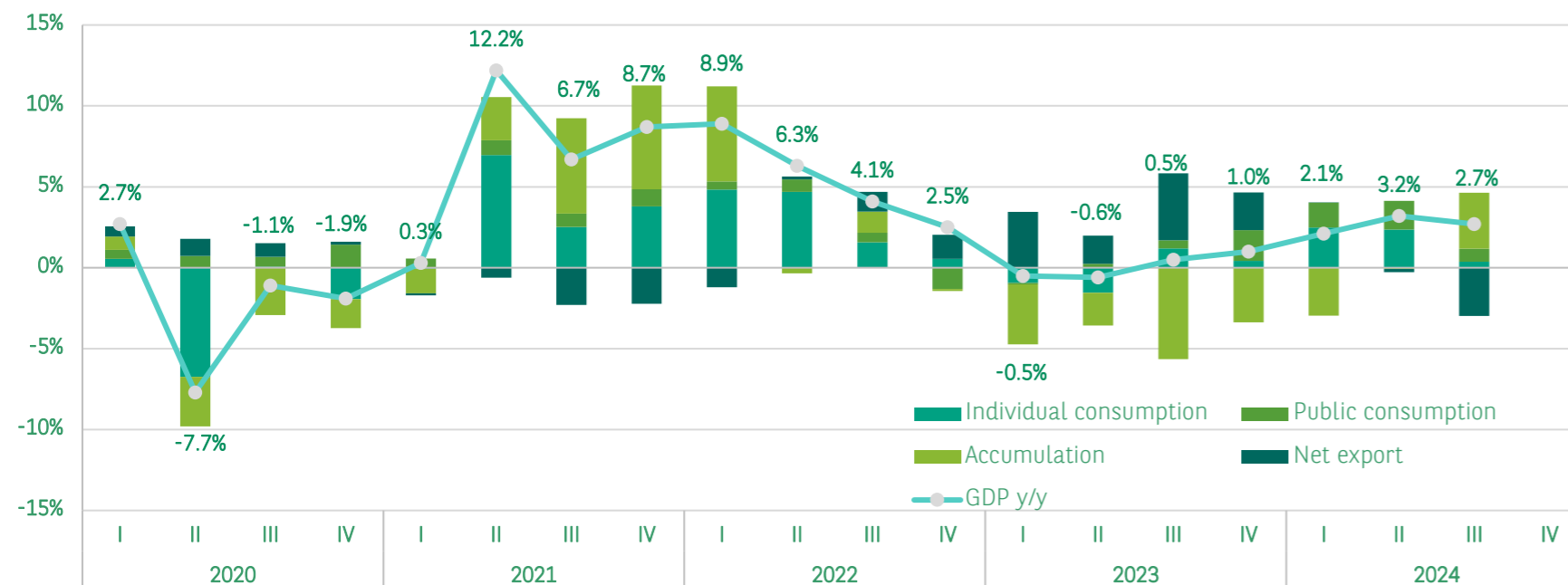


Macroeconomic situation

GDP

In Q3 2024, GDP grew by 2.7% compared to the same period in 2023. The growth rate was slightly lower than in the previous quarter, when the Polish economy grew by 3.2% YoY. The structure of GDP shows that the largest contribution to growth came from the growth of tangible current assets (inventories), which had a positive impact on gross accumulation. Total consumption grew, although the dynamics of household spending was only slightly positive (+0.3% YoY), while government consumption recorded a more noticeable increase (4.5% YoY). Investment in the third quarter did not play a significant role in GDP dynamics, largely reflecting a decline in business capital expenditure. Net exports had a negative impact on GDP dynamics, indicating a deteriorating trade balance. The licentious external environment, mainly related to the weak performance of European industry, was the main reason for limited foreign sales. Monthly data for the fourth quarter suggested that economic growth was again around 3% YoY. Household consumption is likely to have picked up compared to the summer, as indicated by better retail sales data than in Q3 2024. In the near term, greater disbursement and spending of EU funds, particularly from the National Recovery Plan, should lead to a recovery. We forecast that as EU-funded investment spending increases, GDP growth will accelerate to average 3.5% YoY in 2025.

Chart 5. GDP growth



Business activity

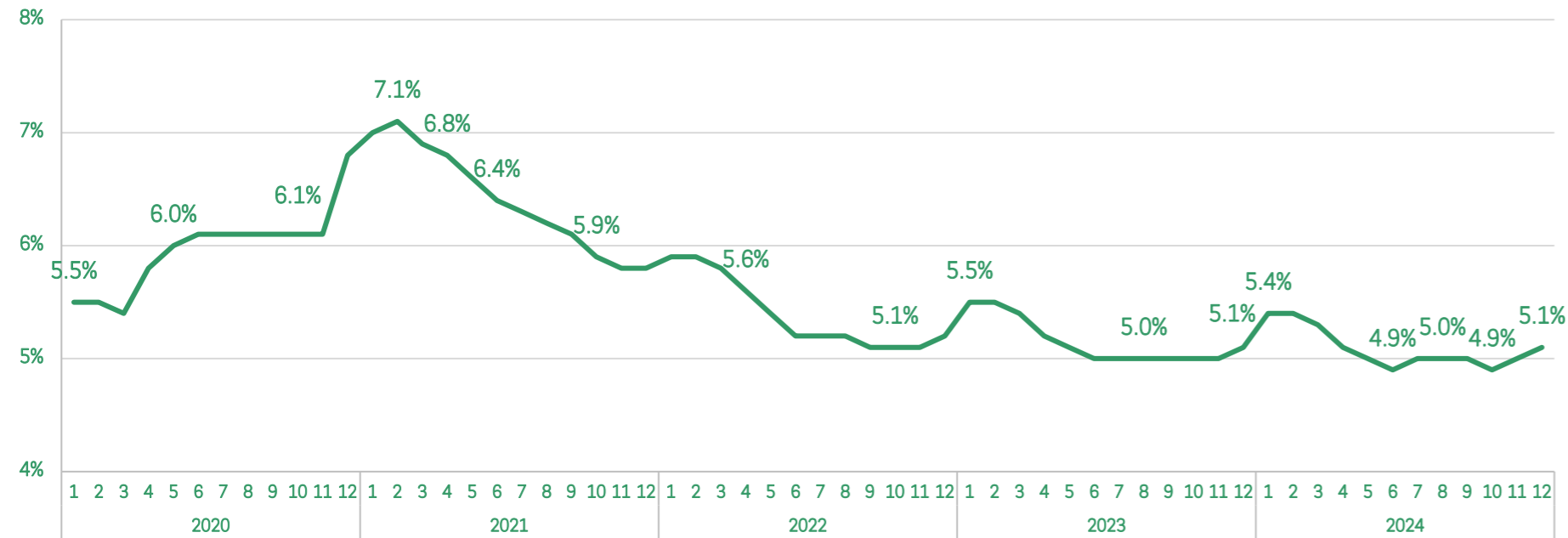
According to the available data for October-December, economic activity in Poland did not change significantly relative to Q3. The dynamics of industrial production remained unchanged (+1.2% YoY), and retail sales in real terms grew by 2.1% - slightly faster than in the July-September period (+1.3% YoY). For construction and assembly production, the decline in work volume deepened to almost 9% YoY. Consumption was somewhat less supported by wage growth. An environment of high interest rates and elevated inflation reduces the propensity to spend. Towards the end of the year, households focused more on rebuilding their savings. In addition, the labour market situation deteriorated. Wages in the industrial sector rose by 6% YoY in real terms. The registered unemployment rate rose to 5.1% in December. Leading indicators suggest that further economic recovery will be driven mainly by industries benefiting from the inflow of new capital in the form of NIP funds. A more pronounced rebound in manufacturing and exports, on the other hand, will be hampered by weak foreign demand.

Inflation

The second half of 2024 was characterised by elevated inflation, exceeding the upper limit of the NBP target (3.5%). This was mainly influenced by the July decision to partially unfreeze electricity and gas prices. As a result, price dynamics increased from 2.6% YoY in June to 4.2% YoY in July. In Q4 2024, inflation in Poland remained close to 5%. The price increase in October-December was mainly due to more expensive food. The beginning of 2025 is likely to bring further moderate price increases. The Energy Regulatory Authority has decided to increase the tariff for gas distribution, which will add around 0.2 p.p. to inflation. In turn, the extension of the government's freeze on electricity prices at PLN 500/MWh will limit the scale of the CPI increase. According to the NBP, thanks to the government's decision, inflation could average around 4.5% in 2025 compared to 5.6% without the measure. We see inflation peaking in March at around 5.5%. In the second half of 2025, however, consumer price dynamics should drop below 3.5%.



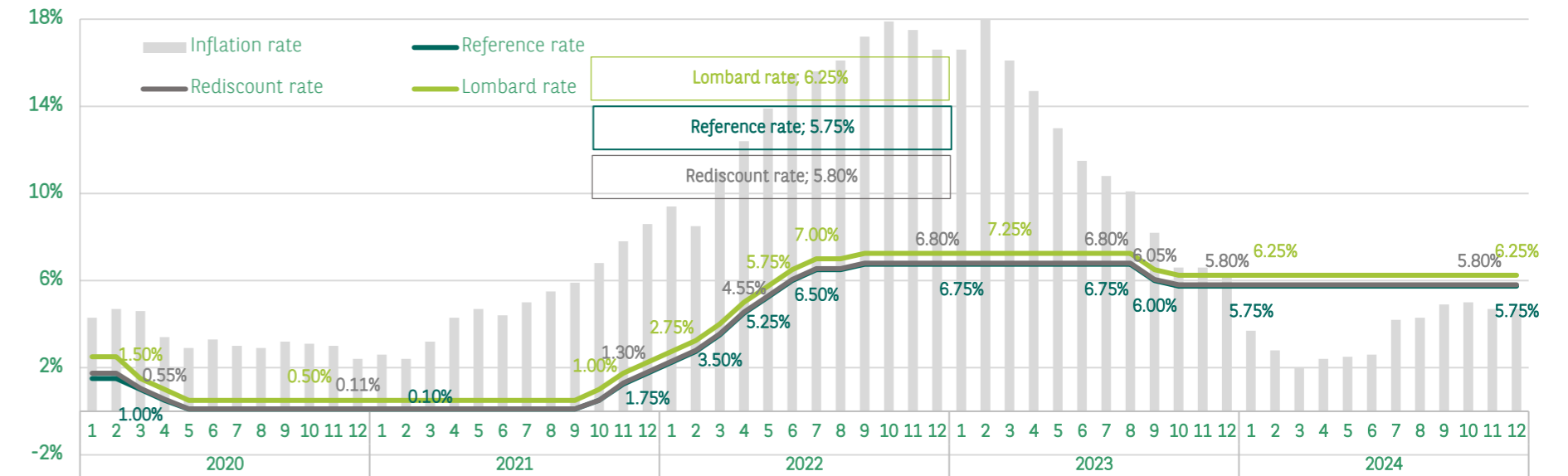
Chart 6. Registered unemployment rate



Monetary policy

The Monetary Policy Council (MPC) left interest rates unchanged at 5.75% in December. In the MPC's view, the current level of NBP interest rates is conducive to meeting the inflation target in the medium term, and further decisions will depend on incoming information on the outlook for inflation and economic activity. Towards the end of last year and the beginning of 2025, the tone of communication from the MPC tightened noticeably. President Glapinski's statements suggest that discussion of an interest rate cut in March this year is unwarranted, and that the first such step could take place towards the end of 2025 or even as late as 2026. President Glapinski explained his caution about the prospects for interest rate cuts by the uncertainty about the evolution of energy prices this year. Given that in March, when NBP analysts present updated economic projections, there will most likely still be no clarity on the level of energy prices in the second half of this year, in the baseline scenario we assume that the Council will decide to start the cycle of interest rate cuts only in July. We forecast that by the end of this year the reference rate will fall to 4.00%

Chart 7. Inflation and interest rate



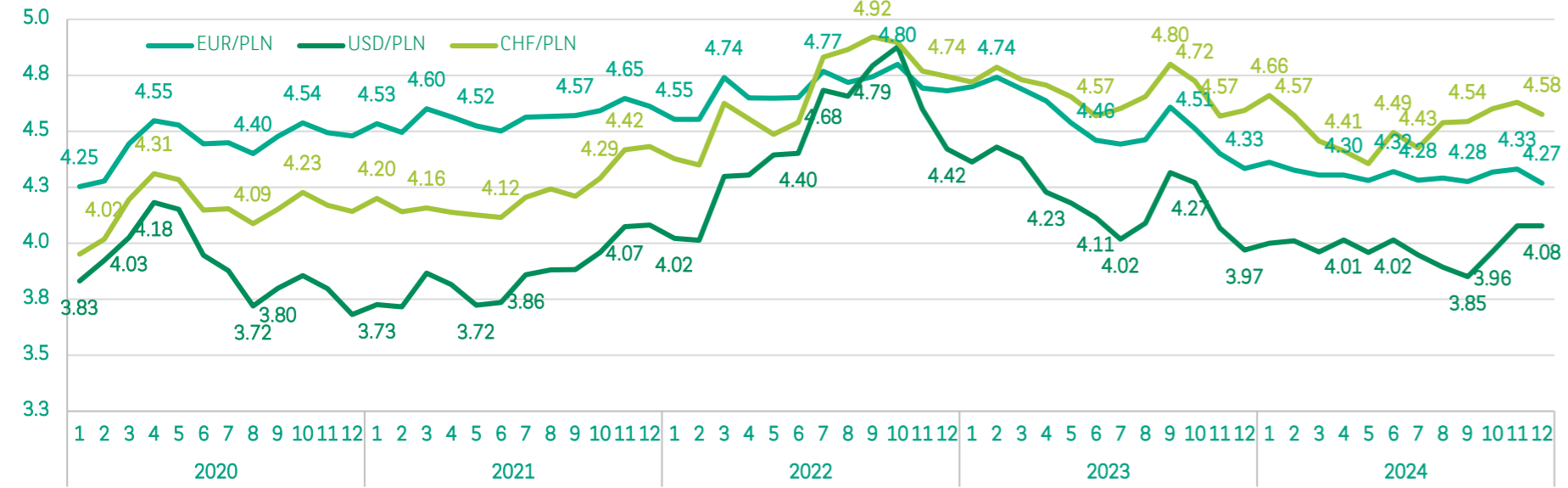
Bond market

In the second half of the year, the valuation of Polish bonds was largely driven by movements in the underlying markets (US, Germany). In the middle of the year, there was a marked decline in yields, due to weaker economic data from the US and expectations of interest rate cuts by the ECB and the Fed. However, in Q4 2024, expectations of interest rate cuts in the US weakened significantly reversing the downward trend on yields. As a result, the cost of taking on new debt in Poland has also increased. Yields on 2-year bonds reached 5.1% in December, compared to 4.7% recorded in July. In turn, the valuation of 10-year treasury bonds at the same time increased from 5.10-5.20% to 5.90%. The increase in yields on the Polish debt market was also influenced by domestic monetary policy. Towards the end of the year, there was a clear tightening of the MPC's rhetoric, which shifted market expectations for interest rate cuts from March to July 2025.



Currency market

Chart 8. PLN exchange rate (monthly average)



Since the autumn of last year, the zloty has strengthened significantly, with the EUR/PLN exchange rate oscillating between 4.25-4.40. The strength of the Polish currency was significantly influenced by the unblocking of EU funds under the National Recovery Plan (NRP) at the end of last year, but also by the decline in inflation in Poland in recent months, which, with unchanged monetary policy parameters, resulted in a significant increase in real interest rates in our country. The prospect of no changes in NBP policy in the coming months and monetary easing in the euro area and the US should continue to support the attractiveness of the Polish currency, especially in the absence of significant foreign trade imbalances. Indeed, the small current account deficit is more than financed by the inflow of European funds.

Performance of the banking sector

Basic categories of the Banking sector profit and loss account

In 2024, the net result of the banking sector in Poland, according to preliminary data from the Polish Financial Supervision Authority (NBP), amounted to PLN 42.2 billion and was higher YoY by PLN 14.2 billion, i.e. by 50.9%, than the result achieved in the previous year. Such a significant improvement was recorded, despite the burden on the banking sector of the new iteration of the government's borrower support programme, the so-called credit holidays. Its impact on the sector's result was significantly lower compared to the programme of 2022. The programme in 2024 allowed for the suspension of 4 capital and interest instalments and was characterised by additional entry conditions (in particular, the income criterion), which limited the group of its addressees.

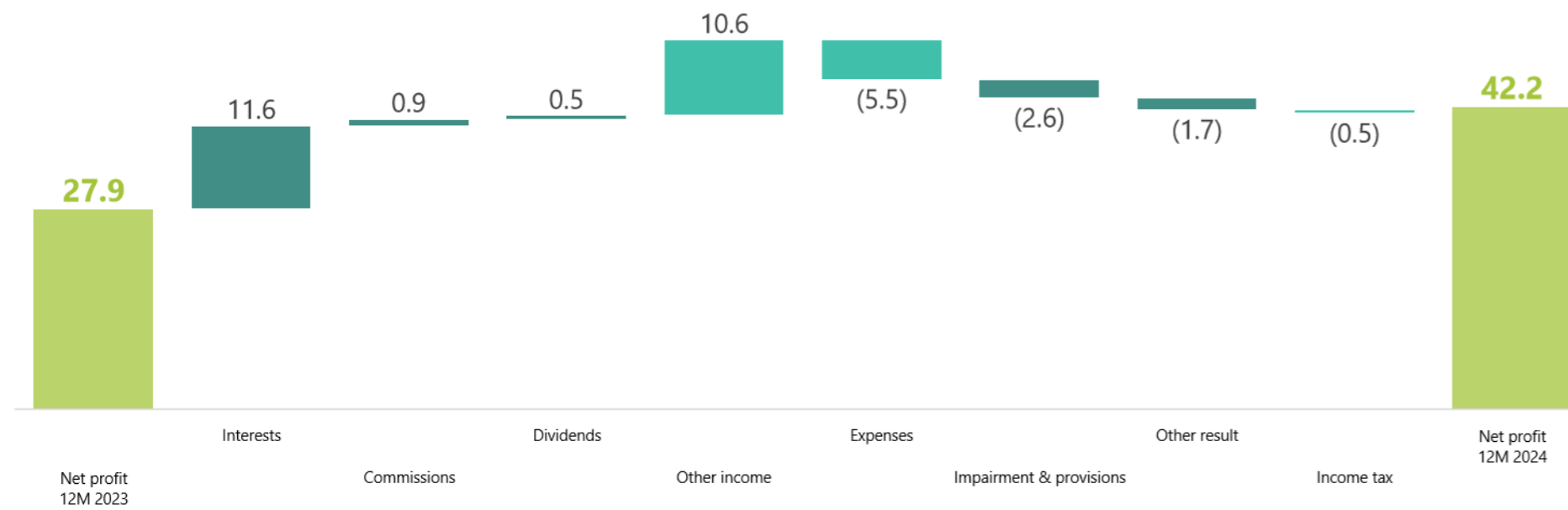
The increase in the sector's net financial result was determined by comparable volumes: a clear improvement in net interest income (which occurred despite being charged with part of the costs of the new iteration of the credit holiday scheme) and increase in the sector's so-called net other banking income. Also contributing slightly positively to the annual change in net income were increases in net fee and commission income and in dividends, as well as a decrease (in nominal volume and effective rate) in income tax. In the opposite direction were the significantly higher operating expenses, the marked deterioration in negative result from impairment and provisions and the decrease in other (net) result.

Total net interest income increased YoY by PLN 11.6 billion, i.e. by 12.1%. This improvement occurred despite the aforementioned booking by Banks of some of the costs of the new iteration of the credit holiday programme and lower average NBP interest rates than in the previous year. The impact of lower interest rates on interest income was offset by a decrease in interest expenses, which were mitigated by high the sector's over-liquidity, allowing the average deposit rate to be effectively reduced, while retaining some of the promotional offers relevant to Customer acquisition processes. There was also a significant decrease in the net cost of interest on interest rate hedging instruments (YoY by PLN 3.5 billion).

Bank operating expenses (including depreciation and amortisation and bank tax) increased YoY by PLN 5.5 billion, i.e. by 10.9%, mainly as a result of an increase in employee costs YoY by PLN 3.2 billion, i.e. by 12.9%, accompanied by both an increase in general and administrative expenses YoY by PLN 1.8 billion, i.e. by 8.8%, and depreciation and amortisation by PLN 0.5 billion, i.e. by 9.7%. Regulatory costs, which are an integral part of general and administrative expenses, grew at a slower rate and were PLN 0.1 billion, or 7.4%, higher than the 2023 level. At the same time, they included, in both analysed periods, only the contribution to the Forced Restructuring Fund under the BGF (in both periods, in turn, banks were not obliged to contribute to the Guarantee Fund under the BGF).

The deterioration in the other result was due to a significant decrease (by PLN 1.7 billion YoY) in modification result - mainly as a result of banks booking in this category part of the cost of the new iteration of the loan holiday programme.

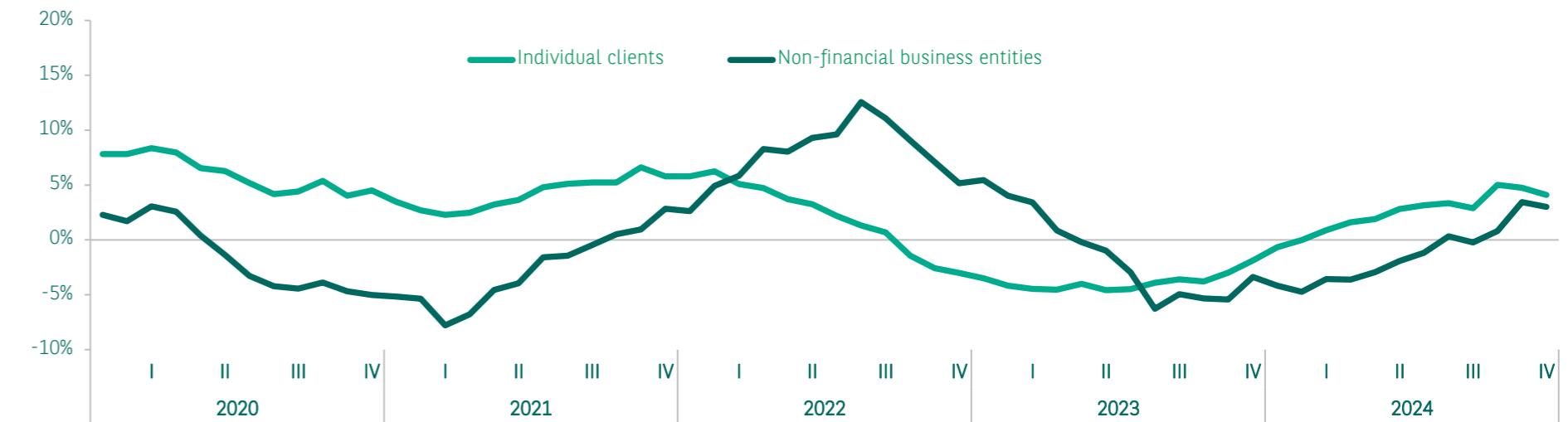
The burden on the result resulting from the negative balance of impairment losses and net provisions was higher YoY by PLN 2.6 billion, i.e. by 15.8%, mainly as a result of deterioration of the result on provisions by PLN 2.6 billion, i.e. by as much as 28.5%. This occurred with the persistently high number of lawsuits concerning the loans in question and the continuation of the jurisprudence line unfavourable to Banks. The deterioration of the result on account of provisions was accompanied by a much less significant, in volume terms, leaping deterioration of the result on account of write-downs on non-financial assets - it fell by PLN 0.6 billion, i.e. 6 times in relation to 2023. On the other hand, the negative result from write-downs on financial assets improved by an analogous volume (by PLN 0.6 billion, i.e. by 8.8%) in annual terms.

**Chart 9. Selected items of the profit and loss account of the banking sector (PLN billion)**

Basic categories of the Banking sector balance sheet

According to NBP data (according to MONREP methodology), the total volume of loans to non-bank Customers at the end of 2024 amounted to PLN 1,475 billion, and increased YoY by PLN 74.0 billion, i.e. 5.3% (at the end of 2023 volume did not change compared to the end of 2022). Volume growth was recorded in each of the four (main) Customer segments analysed. In the loans to individuals segment, growth was 27.9 billion YoY, i.e. 4.1% (with a YoY decrease in 2023 of 12.9 billion, i.e. 1.9 %) and in the loans to non-financial businesses segment 14.5 billion YoY, i.e. 3.0% (with a YoY decrease in 2023 of 16.9 billion, i.e. 3.4%). Loan volume growth in the non-bank financial institutions and general government segments was much more dynamic in 2024, amounting to, respectively: PLN 21.0 billion YoY or 15.5% (compared to a YoY increase of PLN 23.9 billion i.e. 21.5% in 2023) and PLN 10.6 billion YoY i.e. 10.3% (compared to a YoY increase of PLN 5.9 billion i.e. 6.1% in 2023).

The accelerating YoY growth of loans to non-financial businesses over the course of 2024 was determined by the still limited but increasing YoY growth of loans to businesses, which reached PLN 20.8 billion or 5.4% at the end of December 2024. On the other hand, YoY growth in loans to non-financial businesses was significantly limited as a result of another significant annual decline in loans to individual entrepreneurs (by PLN 6.7 billion, i.e. 12.0%). The volumes of loans to farmers as well as loans to non-commercial institutions remained at levels similar to those achieved at the end of 2023 (YoY increases of PLN 0.3 billion, i.e. 1.0%, and PLN 0.1 billion, i.e. 1.5%, respectively).

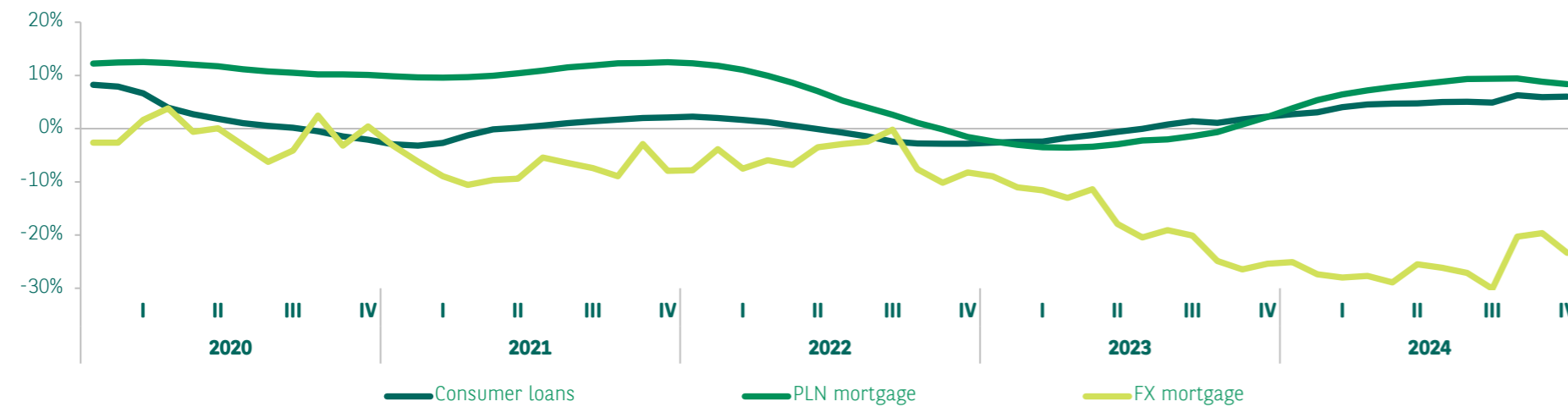
Chart 10. Loans to non-financial sector Customers (YoY dynamics)

Source: NBP

The growth in corporate loans was driven by: a gradual, moderately high YoY increase in current account loans (by PLN 10.7 billion, i.e. 6.9%, at the end of 2024, as against a decrease by PLN 5.0 billion, i.e. 3.2%, at the end of 2023), as well as the still relatively slow, though also accelerating, growth in investment loans (by PLN 7.5 billion, i.e. 3.6%, at the end of 2024, as against a decrease by PLN 2.0 billion, i.e. 0.9%, at the end of 2023). The accelerating but still limited demand for credit by businesses (especially investment credit) resulted, inter alia, from - as indicated by the NBP in its Financial Stability Report - the use of own funds accumulated on Bank accounts and the wider use of alternative forms of financing activity, especially leasing. This is confirmed by estimates from the Association of Polish Leasing, according to which the value of new financing provided by leasing companies, including those dependent on banks (which corresponds in substance to the value of new sales of bank loans) to all entities increased by 10.4% YoY in 2024, once again reaching a historically record level of PLN 110.5 billion. Meanwhile, the NBP's estimate of the value of new agreements, i.e. sales of loans to businesses (in PLN currency excluding renegotiated agreements), grew YoY in 2024 at almost half the rate, i.e. by 6.4%, while the corresponding estimate for individual farmers and individual entrepreneurs (combined) fell by as much as 21.0%.



Chart 11. Loans to retail Customers (YoY dynamics)



Source: NBP

The volume of loans to individuals increased YoY by PLN 27.9 billion, or 4.1% (against a decrease of PLN 12.9 billion, or 1.9%, at the end of 2023). This was mainly due to an increase in the volume of PLN housing loans, up by PLN 33.8 billion, or 8.3% (with a YoY increase of PLN 8.7 billion, i.e. 2.2%, at the end of 2023), accompanied by a much less volumetrically significant, albeit slightly slower, increase in consumer loans, up by PLN 11.9 billion, i.e. 6.0% (with a YoY increase of PLN 4.4 billion, i.e. 2.3%, at the end of 2023). Foreign-currency housing loans (volume before reduction by legal risk provisions) recorded a YoY decrease of PLN 17.8 billion, i.e. by 23.3% (with a YoY decrease of PLN 25.9 billion, i.e. 25.4%, at the end of 2023), mainly due to write-offs resulting from lawsuits concluded by the Banks which ended in defeat, repayments of these loans and voluntary conversions to PLN loans resulting from settlements concluded by the Banks with borrowers.

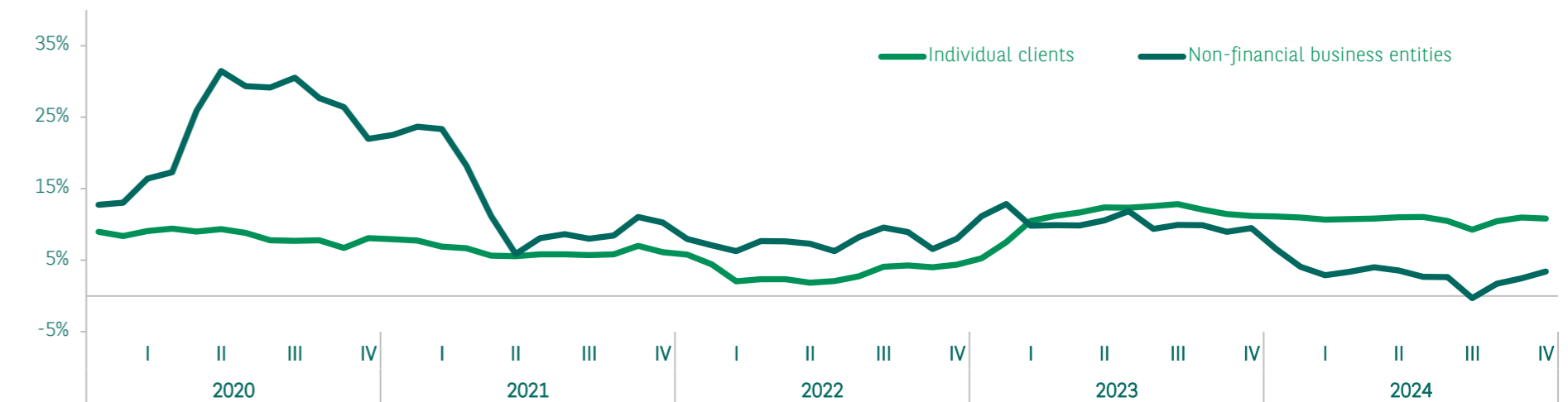
The dynamic YoY growth of PLN housing loans, which gradually accelerated in the first three quarters of 2024 (but slowed down markedly in Q4), was particularly influenced by the government's "2% Safe Credit" programme ("BK2%") in operation from July 2023 to 2 January 2024, supporting the purchase of a first home. According to data from the Credit Information Bureau (BIK), in H2 2023, new sales of housing loans under the 'BK2%' programme amounted to PLN 16.9 billion, accounting for as much as 60% of total loan sales for this purpose (i.e. PLN 28.2 billion). In H1 2024, it was PLN 13.5 billion (de facto from applications made at the end of 2023) or 29% of the total (PLN 46.5 billion), respectively. In turn, the effect of these sales (also from H2 2023, which is due to the specific nature of housing investments) was belatedly evident in the NBP volume data analysed, which speak of actual disbursements of housing loan tranches, increasing the reported indebtedness of retail Customers.

For the whole of 2024, new sales of housing loans amounted, according to preliminary BIK data, to PLN 87.1 billion, growing dynamically YoY by 36.1% (14.8% after excluding applications of the 'BK2%' programme submitted in 2023 and processed by Banks in 2024). In addition to the 'BK2%' factors likely to positively impact the growth of programme, the new sales were the sustained, throughout 2024, nominal wage growth in the corporate sector exceeding 11% on average (translating into an increase in creditworthiness), the sustained increase in the average price per sq m of flats (translating into an increase in the average value of new loans) and the reduction of interest rates by the MPC in late Q2/early Q3 2023. On the other

hand, the aforementioned weakening of the dynamics in Q4 2024 was influenced (similarly as in H1 2023) by the deferral of demand for housing credit, this time related to the anticipation of the launch of another government programme supporting the purchase of the first flat, which has been delayed several times.

The aforementioned moderately high YoY increase in the volume of consumer loans at the end of 2024 was mainly due to an increase in cash loans. According to BIK data, their volume increased YoY by PLN 13.0 billion i.e. 8.1%. This was driven by dynamic growth - by approx. 40% in YoY value terms - in the value of sales of high-value cash loans (over PLN 50,000), with a 28.6% (i.e. by PLN 21.1 billion YoY) increase in total cash loan sales. The apparent difference between the dynamics and growth rates of the balance of volume and sales of cash loans is due to the fact that part of them were of a consolidation nature. The consumer loan market was also positively influenced by increasing creditworthiness, supported by the aforementioned increase in salaries, and - more strongly than in the case of housing loans - the aforementioned interest rate cuts at the turn of Q3 and Q4 2023.

Chart 12. Deposits from Customers of non-financial sector (YoY dynamics)



Source: NBP

The volume of non-bank Customer deposits at the end of 2024 amounted to PLN 2,224 billion, and increased YoY by PLN 202.0 billion, i.e. by 10.0%. At the end of 2023, the YoY growth was PLN 177.2 billion, and the dynamics was similar to this year's at 9.6%. The factor that influenced the slightly higher than at the end of 2023 dynamics of total deposits - despite the growing base effect - was the dynamic growth of government deposits. It amounted to PLN 64.1 billion, or as much as 35.1%, in 2024 year on year, while in 2023 deposits from this group of Customers fell slightly - by PLN 3.3 billion, i.e. 1.8%. Private individuals also made a positive contribution to the faster growth in the volume of total deposits than in 2023. The YoY increase in deposits in this Customer segment at the end of 2024 amounted to PLN 118.1 billion (i.e. 10.8%), compared with an increase of PLN 110.1 billion (i.e. 11.2%) at the end of 2023. On the other hand, a strong slowdown in the growth of deposits was recorded in the non-financial corporate segments - in 2024, their volume increased by more than half as much as in 2023 (YoY by PLN 23.0 billion, i.e. 3.4%, and by PLN 57.6 billion, i.e. 9.4%, respectively). On the other hand, in the



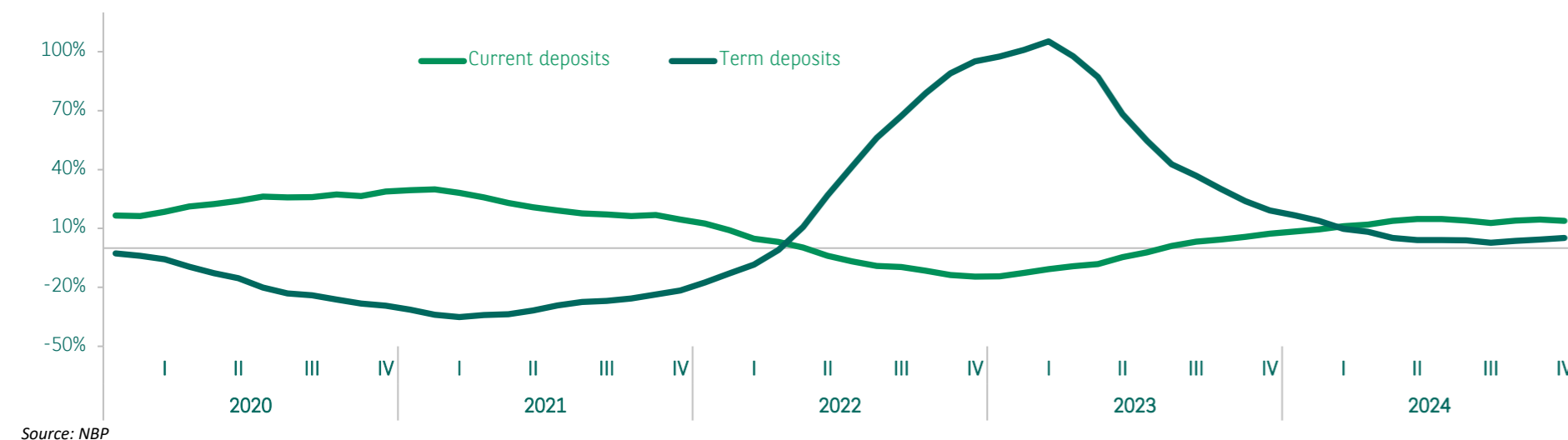
least volumetrically significant segment of non-bank financial institutions, deposits declined slightly in 2024 (YoY by PLN 3.1 billion, i.e. 4.0%), in contrast to the marked increase recorded in 2023 (YoY by PLN 12.9 billion, i.e. 20.2%).

The deceleration in the growth of non-financial corporates' deposits, in product terms, resulted solely from a significant, 10-fold reduction in the YoY volume growth of their current deposits to PLN 4 billion (i.e. 0.8%) at the end of 2024. The very slight growth in current deposits was linked in particular to the non-financial corporates' use of own funds to conduct their business (instead of loans, as shown in the aforementioned NBP Report) and their search for more favourable forms of investing actual financial surpluses. This resulted, among other things, in a YoY increase in the volume of term deposits of this Customer segment was higher in value terms (PLN 19.0 billion) and slightly faster (11.4%) than in 2023 (YoY PLN 16.0 billion, and 10.6% respectively). In entity terms, the strongly limited growth in non-financial corporate deposits was determined by the half-yearly increase in the deposits of the size-dominant corporate sub-segment (by PLN 19.6 billion, compared with PLN 40.6 billion in 2023).

The marked decline in interest rates on new retail Bank deposits, caused by the reduction in interest rates at the end of Q3/early Q4 2023, directly contributed to a more than threefold smaller increase in the volume of retail time deposits in 2024 (by PLN 19.5 billion) than in 2023. At the same time, it prejudged the deep decline in the dynamics of this category to 5.2% (from 19.2% at the end of 2023). The lower interest in time deposits was also reflected in an increase in demand for alternative forms of placement of funds, as a result of which the positive balance of deposits and redemptions of capital market investment funds (excluding PPK funds) for the whole of 2024 was twice as high as for the whole of 2023 and amounted to PLN 36.9 billion. Gross sales of retail government bonds were also a record in 2024, amounting to PLN 82.6 billion, compared to PLN 48.7 billion in 2023.

On the other hand, in view of the aforementioned persistently high dynamics of the population's income (with a stable registered unemployment rate) and the Banks' retention of mainly promotional offers on savings accounts, at the end of 2024 a very high growth in current deposits of retail Customers was recorded (by PLN 98.7 billion, i.e. 13.8%). In value terms, this was 5 times higher than the aforementioned increase in time deposits in 2024, and at the same time 2 times higher than the increase in current deposits alone in 2023.

Chart 13. Deposits for retail Customers (YoY dynamics)



Stock market and investment situation

In 2024, the WIG stock index, representing all listed companies on the Warsaw Stock Exchange (WSE), recorded its highest level ever in May. After increases in the fourth quarter of 2023, the first months of 2024 saw a few per cent correction in the quotations. However, the following months, up to and including June, saw a clear upward trend, which translated into the quotations reaching their historical maximum in the vicinity of 89 700 points. The second half of the year saw a gradual reversal of the trend, which translated into a moderate downward trend. Ultimately, the WIG index ended 2024 with a return of 1.4% relative to levels at the end of 2023. The twelve months of 2024 produced mixed returns among the company segments, although the previous periods were characterised by a greater spread in terms of performance. Between 31 December 2023 and 31 December 2024, the three main indices from the WSE showed positive returns. The index grouping mid-cap companies (mWIG40) behaved relatively best, gaining nearly 6.0%. The worst behaved index was the largest companies (WIG20), which recorded a loss of more than 6.0%.

The indices of the Warsaw Stock Exchange did not match the behaviour of foreign equity markets. For example, the US S&P500 index recorded a positive return of 23.3% in 2024 and the German DAX gained 18.8%. Among the underlying indices, the French CAC40 performed relatively less well, losing 2.2% over the stated period.

Table 3. Value of the main indices on the WSE

Index	31.12.2024	31.12.2023	31.12.2022	change 2024 vs. 2023	change 2023 vs. 2022
WIG	79,577	78,460	57,463	1.4%	36.5%
WIG20	2,192	2,343	1,792	(6.4%)	30.7%
mWIG40	6,122	5,785	4,154	5.8%	39.3%
sWIG80	23,595	22,904	17,496	3.0%	30.9%

Source: Bloomberg

The following factors, among others, influenced the 2024 picture on the Warsaw Stock Exchange:

- persistent geopolitical risks in the region in an environment of continued hostilities in Ukraine and estimating scenarios for the end of the war;
- worse-than-expected macroeconomic data, including the economic indicators such as PMI, which led to lowering the economic growth forecasts;
- expectations of the path of Fed and ECB interest rates in the face of differing inflation conditions and macroeconomic data in the region;
- a global surge of optimism driven by overall better financial results of companies as well as the rapid growth of Artificial Intelligence (AI) in the technological sector;
- the expected policy of the Polish Monetary Policy Committee (MPC) and comments from its members;



- a temporary influx of capital into the domestic equity market in the first part of 2024, together with a post-election change in foreign investors' perception of domestic assets (falling risk premiums) and the unlocking of funds from the NIP;
- further capital inflow into the bond market, accompanied by an improved performance of debt funds;
- expansionary fiscal policy pursued in the country (e.g. increase in the minimum wage, announcement of a programme to support the purchase of real estate, revaluation of the 500+ programme) at the same time as lower budget revenues;
- low valuations of domestic companies relative to emerging and developed markets;
- the untapped potential for increased WSE interest in the debut (IPO) of Żabka shares;
- uncertainty surrounding the outcome of the US presidential election and the new president's trade policies.

The year 2024 saw an upward trend in Polish government bond yields. Ultimately, yields on Polish 10-year treasury bonds were around 5.9% at the end of the period, when at the beginning of January it was around 5.2%. It is worth noting that yield fluctuations were significant. After reaching 5.8% in April, the next three months saw a decline to 5.1%. This was mainly due to global factors and, more specifically, to forecasts of an acceleration of the cycle of interest rate cuts by, among others, the US Fed. The above resulted in a dynamic increase in bond values (falling bond yields). On the other hand, starting from the following weeks of August, these expectations gradually reversed on the basis of a change in the narrative of the members of the greens. The argument for this was relatively good macroeconomic data, particularly in the United States, as well as concerns about inflationary pressures, based, i.e. on potential trade wars. The above translated again into an upward trend in government bond yields. Throughout 2024, the Polish Monetary Policy Council (MPC) maintained its hawkish rhetoric, keeping interest rates unchanged, even though market expectations remained more dovish. At the end of the reported period, the reference rate stood at 5.75%. During the December MPC meeting, the body unexpectedly further tightened its hawkish stance, which weighed on bond prices in the final days of the year. As a result, yields on Polish 10-year treasury bonds ended 2024 in the vicinity of 5.9%, when as recently as the end of November it was around 5.5%.

In 2024, 9 new companies appeared on the WSE's main market, 8 of them as a result of the transfer of listings from NewConnect, and 11 entities left the trading floor. On the NewConnect organised market, 13 issuers debuted in the 12 months of 2024, with 13 entities also delisting at the same time. On the Catalyst bond market, a total of 742 bond series were listed and the value of issues exceeded PLN 1,471 billion.

Table 4. Number of companies, market capitalisation and trading volume at the WSE

	31.12.2024	31.12.2023	31.12.2022	change 2024 vs. 2023	change 2023 vs. 2022
Number of companies	411	413	416	(0.5%)	(0.7%)
Capitalisation of domestic companies (PLN million)	731,906	760,213	574,669	(3.7%)	32.3%
Value of share trading (PLN million)	344,757	282,061	293,111	22.2%	(3.8%)
Trading volume of futures contracts (thousand)	13,367	14,418	15,280	(7.3%)	(5.6%)

Source: GPW



Strategy and prospects

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Business strategy GOeyond 2022-2025

The main goal of the GOeyond strategy for 2022-2025, adopted by the Bank's Management Board and Supervisory Board in March 2022, is the dynamic growth of the Bank, which will be an institution that operates efficiently, with committed employees and satisfied Customers, while being a leader in the area of sustainable development. GOeyond's strategy, following a multi-stage build-up of scale through acquisitions in previous years, focuses on organic growth, while maintaining a responsible approach to risk management.

Although the volatile environment may affect the Group's financial performance, our ambition is to achieve the following targets by 2025:

- **Return on equity (ROE): ~12%**
- **Cost/income ratio: max. 48%**
- **Share of sustainable financing: 10%**

The strategic directions contained in GOeyond's strategy are based on solid foundations and the Bank's sustainable and diversified business model. The directions set are valid despite the volatile environment we face. The strategy was developed internally, by a broad group of Bank employees representing all key areas and by representatives of the subsidiaries.

The GOeyond strategy is based on four pillars:

PILLAR UP

It is a strategy of growth. Our aim is to increase the number of Customers, the revenues, and to strengthen our market position.

Retail Banking and Personal Finance

We plan to increase the number of Customers (by 0.5 million to 4.5 million). It can be achieved through innovative products (not just in banking), personalised communication and a wide accessibility to the Bank's products via remote channels.

SME, Corporate and CIB

We are going to strengthen position among the international and local companies, including supporting their international expansion. We want to increase the base of active digitally served Customers. The key aim is to optimise and shorten crediting process.

PILLAR POSITIVE

The Bank wants to be a leader in sustainable finance by developing its product and service offering for all business lines. It will consistently strive for its own climate neutrality and support its Customers in doing so. Responsibility, accessibility, transparency and ethics dominate the relationship with Customers. Activities for local communities and involvement in education and public debate support the strengthening of the Bank's brand.

PILLAR STRONGER

For the Bank, it is important to improve internal processes, transform the IT area with state-of-the-art technologies and accelerate the pace of implementation of new solutions. Planned investments in this area are expected to reach a total of PLN 1.5 billion by 2025. Fast and efficient scalability is to be the basis of a modern digital Bank. The objectives are: to support business growth through advanced analytical tools; to maintain a secure and optimal capital and liquidity position; and to start paying dividends during the current strategy.

PILLAR TOGETHER

The Bank is convinced that a committed and satisfied employee guarantees a high level of Customer satisfaction. The new organisational culture, which supports employee development, proactivity and creativity, encourages bold decisions. In 2022 the Bank began operating under the Agile@Scale working model. Important activities of the Bank include: ensuring work-life balance, taking care of employees' mental health, supporting the development of women and promoting diversity.

Strategy execution in 2024

Contrary to initial macroeconomic forecasts for 2024 indicating a possible further easing of monetary policy, the level of interest rates consolidated at the level of Q4 2023 (reference rate of 5.75%). The stable environment allowed the banking sector to successively build its net financial result (+51% YoY to PLN 42.2 billion) based on interest income (+12% YoY to PLN 107 billion in 2024 according to the NBP). This is the second year with a clear record in this area. However, it should be noted that the sector's current level of profits, although impressive locally and historically, in relation to Poland's GDP, places the sector in the tail of the European Union. At the same time, the sector was constantly under pressure from a number of negative factors. Behind the high level of interest rates was equally high persistent inflation, which put pressure on the scale of administrative costs and consequently the constant need to focus on improving operational efficiency. The issue of further provisions for CHF loans also had a negative impact. On the other hand, another edition of credit holidays was less noticeable than expected (according to BIK data, from 2 June to the end of 2024, participation amounted to 0.2 million borrowers covering 119,000 housing loans with a total amount of PLN 35 billion). On the positive side in terms of business development, one can assess the significant increase in the recovery of lending to households supported by the good economic situation of these entities (increase in the value of granted cash loans by 29% YoY to PLN 94.9 billion and instalment loans by 14% YoY to PLN 26.2 billion and mortgages by 36% to PLN 87.1 billion - taking into account PLN 13.6 billion from the pool of applications under the 2% Safe Credit Programme in 2024 according to BIK). Unfortunately, the



widely anticipated acceleration in the corporate segment did not materialise in the end due to, among other things, the prolonged state of stagnation in foreign demand or risks related to structural factors in the Polish economy.

In 2024, the Bank returned with a full mortgage offer also for new Customers. However, the cautious and selective approach to acquisitions in the market remains unchanged (the Installment-to-Income ratio cannot exceed 35%). While maintaining its universal profile, in 2024 the Bank focused on strengthening its relationships with affluent and private banking Customers and large corporate segment companies. The actions taken were recognised and confirmed by numerous awards and prizes for the Bank in these areas. The development was also supported by the enrichment of the offer with new proposals, such as the Open for You Account with Tennis Card and the Account with Card for Influencers.

In Corporate Banking, the operational model for Poland's largest corporations was transformed by separating managerial and sales functions (especially in terms of advanced and profitable transactions). As part of its corporate offering, the Bank implemented a comprehensive proposition for new entrepreneurs - Start TwojeGO Biznesu, which provides support from business registration, through webinars and training, to bookkeeping. From the end of 2024, e-commerce companies that run (or set up) their shop using the Shoper platform can also integrate their business with the Axepta BNP Paribas payment gateway. Among other things, the solution provides a unique option on the market that allows transactions to be finalised using two different forms of payment. Micro and small businesses alike, can also benefit from innovative solutions that the Bank provides in collaboration with partners (the Carbon Footprint Management and ESG Reporting Platform from Envirly or micro-invoicing from Monevia). The Bank's multifaceted approach to developing relationships with innovative companies makes it possible, on the one hand, to finance such entities, to improve internal solutions with their support, and to offer products and services jointly to Customers. The use of the Specialised Credit Policy for Innovative Companies enabled, among other things, the establishment of a partnership with Algolytics Technologies, an entity operating in the areas of machine learning and artificial intelligence in 2024. Strengthening the accessibility capabilities of open banking services, the Bank was the first in Poland to introduce a premium API service, the Personal Data Information Service (PDIS). It enables the Bank's business partners to verify and confirm user data, e.g. to sign a contract or make a transaction.

The Bank is constantly working to improve process efficiency and integrity. One of the key process implementations to support business activity in 2024 was the introduction of a full credit workflow across all Corporate Banking centres. This significantly reduced the credit process time for the Corporate Customer segment. The Bank also started work on the first Enterprise Resource Planning (ERP) system on the market to operate entirely in the cloud (Oracle Fusion ERP). The implementation and development of solutions based on artificial intelligence, such as the GENiusz Chatbot (optimisation and support of work through GenAI technology) or BaseModel.ai (personalisation of relationships based on behavioural profiles of Customers), also continued intensively in 2024. The Bank's activity in this area has also been recognised and awarded at the Global Retail Banking Innovation Awards 2024 in the "best application of AI" category.

The 2024 was a very challenging year for the banking sector from the point of view of ensuring digital financial security, the importance of which is growing with the development of the digital economy. Accordingly, the Bank continuously monitored and developed its security systems, including by taking a number of measures in the area of technology to strengthen the resilience of its systems against the ever-increasing threats from Distributed Denial of Service (DDoS) attacks. From the Customer's perspective, a key implementation was behavioural protection in the GOMobile application provided by Digital Fingerprints (BIK Group).

As an ESG leader, the Bank continues to increase the level of sustainable financing, with a volume of PLN 10.2 billion at the end of 2024. During the past year, the Bank participated in further transactions supporting energy transformation and sustainable commercial investments (including financing under a PLN 4 billion syndicated investment programme in the window joinery industry). The Bank has also expanded its offering with new green products, and retail Customers can benefit from a new onboarding process in branches that will ultimately save around one million pages of paper per year. One of the Bank's strategic objectives is to increase the proportion of Customer Centres with the awarded "Barrier-free Facility" certificate (a building standard for accessibility for people with reduced mobility). As part of the fight against social exclusion, 41% of the Bank's own Customer Centres can hold this standard. Our commitment to issues important to society and the environment has been recognised by, among other things, being awarded second place in the "ESG Ranking. Responsible Management" and the award given to us jointly with the Ocalenie Foundation in the Diversity Charter competition.

The Bank's business is guided by the principle 'People First: we put people first'. In 2024, the level of employee satisfaction measured by the eNPS indicator exceeded the strategic target for 2025 by 7 points, reaching a score of 27 (with a benchmark of -9 in 2021). This is a particularly important measure as the Bank believes it translates indirectly into an increase in the quality of the products offered and the level of Customer service. Supporting the activities of employee networks and work-life balance, the Bank has continuously developed a wide range of programmes to improve employee well-being. It also promotes diversity at work, adapting to the needs of people with disabilities or neuroatypical people. For the past seven years, the Bank, as a strategic partner, has supported employees in the Szlachetna Paczka campaign, thanks to which 157 families received Christmas parcels last year. The Bank also creates growth opportunities, especially in areas with the highest potential such as IT. Among other things, the Bank's first hackathon was organised in 2024 and further editions of the knowledge-sharing programme #UniversITy were implemented. The approach and activities in the area of corporate culture and working environment have been recognised, including the Digital University Award in two categories: Master of Innovation Leadership (for the Bank's CEO) and Masters of Future Oriented Culture.

In 2024, the Extraordinary General Meeting of Shareholders of BNP Paribas Bank Polska S.A. adopted a resolution on the payment of a dividend for 2023, which was paid on 10 May 2024, thereby fulfilling the Bank's strategic objective set by 2025.

Achieving the strategic financial targets in 2024

Indicator	2025 strategic target	31.12.2024 execution
Return on equity ratio (ROE)	~12%	16.9%
Cost/income ratio (C/I)	max 48%	43.2%
Share of sustainable financing	10%	11.6%



Actions under the strategy's 2024 objectives

PILLAR	KEY ACHIEVEMENTS 2024
<p>#UP Offering high quality banking and non-banking products and services key to growing a Customer base in an omnichannel world. Creating an excellent Customer experience by designing personalised pathways for them.</p>	<ul style="list-style-type: none"> • New products on offer: <ul style="list-style-type: none"> – 8% on deposit account - for new Customers who open ROR in a branch – Start TwojeGO Biznesu - comprehensive support for clients starting their own business – Plan in Case – Protection for young heroes - insurance for children and young people offered in partnership with BNP Paribas Cardif – fixed-rate mortgage - for 5 or 10 years for new and existing Customers – account for Influencers - an added benefit in the form of an innovative Aguard float that, when inserted into the water, collects information about its quality – Visa tennis card - special offer for tennis fans with a range of benefits, tennis deposit with an attractive interest rate – credit for the agri-food sector - with interest subsidy, secured by a guarantee from the Agricultural Guarantee Fund Plus in cooperation with Bank Gospodarstwa Krajowego • New solutions: <ul style="list-style-type: none"> – Envirly Platform: enables carbon footprint management and improves ESG reporting, available to all of the Bank's business Client – API Premium: allows the Bank's business partners to verify and confirm the data of their Clients or contractors • Cooperation with innovative companies: <ul style="list-style-type: none"> – financing of a Polish company Algolytics Technologies - scaleup providing the automation of business processes using Big Data, Machine Learning, Stream Based Modeling – cooperation of the Bank and BNP Paribas Faktoring with FinTech Monevia - new opportunities for Clients from the small business and microenterprise sector in the field of microfactoring • Transformation of the network of corporate centres and separation of homogeneous groups of Customers in order to better adapt the service provided to their needs and specific characteristics
<p>#POSITIVE A responsible and trusted financial partner supporting the positive and sustainable development of Customers, business and society. A guide for Customers in a world of digital and sustainable transformation.</p>	<ul style="list-style-type: none"> • PLN 10.2 billion of sustainable funding at the end of 2024 • Sustainability-related financing within: <ul style="list-style-type: none"> – supporting the energy transition for retail Customers and housing communities (PLN 1.3 billion) under the European Investment Bank programme: – technical support with technical documentation for approx. 850 thermomodernisation investments worth over PLN 340 million under the EFRB Programme (ELENA for Residential Communities) – support for sustainable commercial investments (Green Loan) – Olivia Star office building in Tricity, Lakeside in Warsaw, office building in Warsaw for Stena Group, Panattoni Park Szczecin VI industrial park

PILLAR	KEY ACHIEVEMENTS 2024
<p>#STRONGER BNP Paribas Group's global strength and dynamic technological development combined with the optimisation of E2E processes underpin organic growth and high Customer satisfaction.</p>	<ul style="list-style-type: none"> – Sustainability-Linked Loan – for Groups: CCC, Grenevia, EFL – financing the construction of a portfolio of photovoltaic projects in Poland worth PLN 113.9 million in cooperation with R.Power – Co-guarantee programme with the Export Credit Insurance Corporation for companies looking to finance the green transition • European Investment Fund guarantee for the Bank providing more than EUR 160 million of financing for SMEs and housing associations in Poland • New loans for environmental investments with BGK guarantee: Biznesmax Plus and Ekamax • Introduction of a new onboarding process for retail Customers in branches, with a target of saving around one million pages of paper per year • 143 Customer Centres with "Barrier-Free Facility" certification
<p>#TOGETHER People first: we focus on people. Committed and satisfied employees guarantee a high level of Customer satisfaction. Agile@Scale and a new organisational culture the foundation for a diverse and inclusive working environment based on trust, courage and creativity.</p>	<ul style="list-style-type: none"> • First Bank in Poland to use BaseModel.ai, a tool that enables the creation of behavioural profiles that allow the offer to be tailored to Customers' preferences • Provision of Axepta BNP Paribas payment gateway for Shopper Customers: one of the most popular providers of e-commerce solutions in Poland • Launch of behavioural protection in the GOmobile app for all Customers • A number of activities in the area of technology to strengthen the Bank's resilience against DDoS attacks • Development of the GENIusz Chatbot, based on GenAI technology, with further areas and functionalities to further optimise processes and increase work efficiency (102 use cases based on AI and advanced data analytics) • Full credit workflow - introduced in all corporate banking centres, which has significantly reduced credit process times in this segment • 233 active robots to support Bank operations in the areas of Customer service, HR, billing, risk and compliance (33 implementations in 2024) • More than 50% of Bank's 2023 net profit earmarked for dividend payment - DPS: PLN 3.41
	<ul style="list-style-type: none"> • Employee satisfaction – improvement of the eNPS index to 27 (+4 points vs 2023, above the 2025 strategic target of 20) • Work-life balance initiatives - 2 Hours for Family/Humanity, 2 Hours for Health, Health Days • Community engagement: <ul style="list-style-type: none"> – Szlachetna Paczka (the Noble Gift) – Bank a strategic partner of the campaign for the seventh time, 2.7 thousand committed employees, Bank and Customer support in 2024 amounting to PLN ~2 million – employee volunteering, 2 Earth Hours, Good kilometres, Class - a scholarship and development program

**PILLAR****KEY ACHIEVEMENTS 2024**

- **Creating a culture of continuous development** - LeaderUP: leadership competence model, DevelopAI with Digital Academy, 6th edition of the University program, 4th edition of the I can do IT program, 3rd edition of the ESG Academy, #MyWay training offer, #MamToDamTo, 5 years of the **BNP Paribas Changing Women** development program
- Implementation of the LeaderUP **leadership competence model**
- **BNP Paribas Open Talks** - regular online meetings between members of the Bank's Management Board and employees
- Partnership agreement entitled. "INCLU(VI)SION" with the Activation Foundation supporting the **employment of people with disabilities**
- **Bank's first hackathon** (Aiathon) - building an AI model to identify fraudulent transactions in mobile channels

Outlook 2025+

The key external factors that, in the eyes of the Bank, may influence the Group's results in the nearest years are:

- **War in Ukraine.** The ongoing war beyond the country's eastern border remains a significant factor affecting the economic situation in Poland and globally. The impact of the military action in Ukraine on the financial markets was most evident through commodity prices on world markets, which were at high levels after the start of the war. In Europe, there were justified concerns about the availability of energy carriers, particularly natural gas. High commodity prices had a pro-inflationary effect and worsened Poland's trade balance. Currently, the price-related shocks resulting from the war in Ukraine are fading. In the wake of Donald Trump's ascension to the US presidency, discussion of the possibility of an end to hostilities has intensified in the public space. At the moment, however, there is a lack of specifics in this regard.
- **The rise of protectionism in the United States.** A factor of great uncertainty is the changes in US foreign policy following the start of Donald Trump's presidency. A possible tightening of trade policy by the US would certainly be a negative factor for the European Union. Indeed, the United States is the largest recipient of goods produced in the Union, accounting for around 20% of extra-EU exports. In 2023 alone, EU exports to the US amounted to just over EUR 500 billion. At the same time, sales across the Atlantic represent only 3% of the GDP of the EU as a whole. This means that a 10% drop in US demand would only weaken the EU economy by 0.3%. Although ultimately the impact of a fall in US demand of this magnitude would probably be greater, due to the impact on employment or corporate profits in Europe, it would probably not threaten a deep recession on the Old Continent. Among the countries most exposed to the negative impact of US tariffs are Ireland, Belgium, Slovakia, the Netherlands and Germany. Poland is not in this group. The United States is only the eighth largest recipient of domestic exports, accounting for approximately 3% of total foreign sales. As a result, American demand accounts for only 1.5% of GDP generated in Poland.

- **Global economic conjuncture.** According to the January edition of the International Monetary Fund's (IMF) World Economic Outlook, global economic growth will be 3.3% in both 2025 and 2026, below the historical average (2000-19) of 3.7%. The Fund forecasts a slight slowdown in US growth from 2.8% in 2024 to 2.7% in 2025, and a recovery in the euro area and an increase in real GDP growth from 0.8% to 1.0%. At the same time, the IMF assesses that inflation will continue to fall towards inflation targets. Global inflation is expected to fall to 4.2% in 2025 and to 3.5% in 2026. Price dynamics are projected to return to levels desired by monetary authorities sooner in developed economies than in emerging and developing economies. For Poland, the IMF predicts that GDP will grow by 3.5% in 2025. At the same time, average annual inflation will remain relatively high this year - in the region of 4.5%.
- **Monetary policy by major central Banks.** Apart from the geopolitical situation, the main factor influencing the global pace of recovery is the policies of the major central Banks. The European Central Bank cut the deposit rate by 100 bps to 3.00% from 4.00% in 2024. Towards the end of the year, there was a marked softening of rhetoric from the ECB, suggesting room for further interest rate cuts. The market is now pricing in a deposit rate of 2.00% at the end of 2025. In the US, the Federal Open Market Operations Committee (FOMC) is also continuing its monetary easing cycle. However, after a series of good data from the US economy (including, i.a. employment data), the chances of further reductions have clearly diminished. Moreover, communication from the FOMC has taken on a more hawkish tone, which has also been fostered by uncertainty about the policies of the new US administration. The market is now pricing in a US monetary cost cut of only 25 bps in 2025.
- **National Bank of Poland action.** The Monetary Policy Council (MPC) left interest rates unchanged at 5.75% in January. In the MPC's view, the current level of NBP interest rates is conducive to meeting the inflation target in the medium term, and further decisions will depend on incoming information on the outlook for inflation and economic activity. Towards the end of 2024, the tone of communication from the MPC tightened noticeably. President Glapinski's statement implied that discussion of an interest rate cut in March this year was unwarranted, and that the first such step could take place at the end of 2025 or even as late as 2026. President Glapinski explained his caution about the prospects for interest rate cuts by the uncertainty about the development of energy prices this year. Given that in March, when NBP analysts present updated economic projections, there will most likely still be no clarity on the level of energy prices in the second half of this year, in the baseline scenario we assume that the Council will decide to start the cycle of interest rate cuts only in July. We forecast that by the end of this year the reference rate will fall to 4.00%.
- **Behaviour of the zloty against key currencies.** At the beginning of the fourth quarter, the zloty weakened slightly against the major currencies. This was mainly due to growing uncertainty in the foreign exchange market in connection with the November US presidential election. The risk aversion that persisted at the time fostered an outflow of capital from emerging markets (including Poland) towards safe currencies (the dollar). At the end of October and the beginning of November, the EURPLN exchange rate rose to 4.36 from 4.28 recorded at the end of September. However, since November, the zloty has been clearly gaining in value to reach 4.26 per euro by the end of the year. The prospect of no changes in the NBP's policy in the coming months and monetary easing in the euro area should continue to support the attractiveness of the Polish currency, especially in view of the absence of significant imbalances in foreign trade. We assume that the small current account deficit will be more than financed by the inflow of European funds and foreign investment both this year and next year. On the other hand, uncertainty related to the direction of economic policy that Donald Trump will take may increase volatility in the foreign exchange market. Assuming the scenario of a significant



tightening of trade conditions through tariffs, the currencies of Emerging Markets countries, including the zloty, are likely to lose value. As a result, we forecast that at the end of 2025, the EURPLN exchange rate will be around the level of 4.35.

- **Development of economic activity in Poland.** In the third quarter, GDP growth slowed to 2.7% YoY from 3.2% YoY in the spring. However, the economic expansion was largely driven by inventory growth. Private consumption grew only marginally (+0.3% YoY). Net exports had a negative impact on GDP growth, reflecting weak foreign demand. Monthly data for Q4 indicate no significant increase in economic activity in Poland and GDP dynamics around 3% YoY. In the near term, greater disbursement and spending of EU funds, particularly from the National Recovery Plan, should lead to economic recovery. We forecast that, with the increase in EU-funded investment spending, GDP growth will accelerate to average 3.5% YoY in 2025. The looser policy of the European Central Bank should be conducive to an upturn, primarily in Germany, although the impact is likely to be more pronounced in the second half of this year and next year. This, in turn, will favour Polish exports.
- **Situation on the domestic labour market.** Wage growth pressure in Poland is gradually easing. In the second half of the year, wages in the corporate sector grew by 10.2% YoY on average, compared with almost 12% YoY in H1 2024. Taking into account higher inflation, wages increased by almost 6% YoY in real terms. At the same time, employment decreased by an average of 0.5% YoY against a decline of 0.3% YoY in January-June. The registered unemployment rate remained around 5%. Wage growth is expected to slow to single-digit levels in 2025 due to lower minimum wage and public sector earnings increases than last year.
- **Inflation trajectory.** The second half of last year was characterised by elevated inflation, exceeding the upper limit of the National Bank of Poland's target (3.5%). This was mainly influenced by the July decision to partially unfreeze electricity and gas prices. As a result, price dynamics increased from 2.6% YoY in June to 4.2% YoY in July. In Q4 2024, annual inflation in Poland remained close to 5%. The price increase in October-December was mainly due to more expensive food. The beginning of 2025 is likely to bring further moderate price increases. The Energy Regulatory Authority has decided to increase the tariff for gas distribution, which will add around 0.2 p.p. to inflation. In turn, the extension of the government's freeze on electricity prices at PLN 500/MWh will limit the scale of the CPI increase. According to the NBP, thanks to the government's decision, inflation could average around 4.5% in 2025 compared to 5.6% without the measure. We see inflation peaking in March at around 5.5%. In the second half of 2025, however, consumer price dynamics should drop below 3.5%.
- **Imbalances in public finances.** According to the NBP forecasts, Poland's public finance sector deficit will increase to 6% of GDP in 2024, while the Ministry of Finance estimates it at around 5.7% of GDP. The increase in the deficit compared to previous years is due to, i.a. increased defence spending, higher outlays for social benefits and salary increases in the budget area. The excessive deficit procedure imposed on Poland by the European institutions obliges Poland to reduce the budget gap to 3% of GDP by 2028. According to the European Commission, the accumulated high fiscal deficits and lower nominal GDP growth rate will increase the public debt-to-GDP ratio in the following years from 54.7% in 2024 to 62.4% in 2025. The increase in the debt ratio will be an additional argument for fiscal discipline in the coming years.
- **Sentiment in major financial markets.** One of the main factors that will influence market sentiment in 2025 will be the presidency of Donald Trump and the associated risk of tighter US trade policy. The decisions of the new administration may be reflected in both the currency and stock markets. The next steps of the ECB and the Federal Reserve will also be important for financial markets. The continuation of the cycle of interest rate cuts in the euro area and the USA may

stimulate risk appetite, also positively affecting the markets of Central and Eastern Europe, including the zloty. Locally, the war in Ukraine will remain the focus of the markets' attention. This is of particular importance in the context of the exchange rate of the Polish currency. In the event of increased risk aversion, the zloty, like other emerging market currencies, may lose value.

- **WIBOR-based lending.** The dispute over WIBOR-based loans gained media exposure in late 2022. In July 2023 the Office of the Polish Financial Supervision Authority (PFSA) published a position paper in which it emphasised that, in the PFSA's view, there are no grounds to question the reliability and legality of WIBOR, in particular in the context of the application of this index in mortgage loan agreements in Polish currency. According to the Association of Polish Banks (ZBP, as of the end of 2024), there are currently over 1,400 court proceedings in which Customers are challenging contractual provisions providing for interest rates based on the WIBOR reference index. The most important interest rate index for PLN loans with variable interest rates was removed from the loan agreement for the first time ever by a court in Suwałki on 4 October 2024 (non-final judgment). According to experts, including the ZBP, this ruling does not pose a risk to the existing line of case law. In all finalised proceedings, rulings were given in favour of the Banks.
- **Draft of the new franking law.** In February 2025, a draft of the new Act on special solutions for the recognition of cases concerning credit agreements denominated or indexed to CHF The Act concerns claims related to a credit agreement concluded with a Customer denominated or indexed to CHF concluded with Customers was published (not applicable to foreign currency loans). The key mechanisms provided for in the draft law include:
 - suspension of the fulfilment of the Customers' obligation to perform their obligations under the credit agreement as soon as the lawsuit is served on the Bank,
 - make the judgment at first instance awarding a monetary benefit to the Customer enforceable as soon as the judgment delivered in closed session is pronounced or served on the defendant Bank,
 - removal of time limits on raising a set-off, removal of interpretative doubts as to whether a declaration of set-off can be made and accepted by a legal representative,
 - allowing a request for the Bank's restitution claim to be made during proceedings initiated by the Customer,
 - granting tax benefits to parties who choose to withdraw appeals addressed to the courts,
 - the possibility for the parties in franking cases to be heard in writing and the exclusion of restrictions on hearing witnesses outside the courtroom in a remote meeting,
 - the introduction of a re-examination (so-called pre-court) of cassation appeals accepted by the Supreme Court for examination in franking cases, prior to the unification of the jurisprudential line in these cases.

The law is tentatively scheduled to be enacted in Q2 2025.

- **New reference index.** The first attempt to designate an alternative interest rate benchmark to WIBOR failed. After the National Working Group (NGR) designated WIRON as the successor to WIBOR in the early autumn of 2022, emerging concerns about its calculation methodology put the plan on hold. After two rounds of consultation, the NGR presented WIRF- as the new index for credit agreements in December 2024. WIRF- is a risk-free rate index based on overnight transactions, excluding corporate deposits, which, according to the Association of Polish Banks, were the cause of errors



in the WIRON index. In line with the decision of the NGR Steering Committee of 24 January 2025, the technical name WIRF has been changed to POLSTR (Polish Short Term Rate). Ultimately, POLSTR- is intended to become a key interest rate benchmark within the meaning of the BMR Regulation that can be used in financial contracts (e.g. loan agreements), financial instruments (e.g. debt securities or derivatives) and by investment funds (e.g. in setting management fees). It is necessary to update the so-called Roadmap, which will specify the schedule and milestones for its implementation. Currently, the deadlines for the appearance of POLSTR, for example in mortgage loans or other banking products, are not known, nor is it known what the process of replacing the reference indicator in current credit agreements should look like.

- **Long-term funding ratio.** 2023 the FSC has announced that, in order to change the structure of mortgage funding, it plans to introduce a new long-term funding ratio (WFD) for Banks. The proposed changes aim to reduce the risks associated with the current mortgage funding structure by increasing the funding of long-term mortgages primarily with long-term debt instruments. On 17 July 2024, the PFSA announced that it had adopted the WFD Recommendation on the Long-Term Funding Ratio and expects that from the end of 2026, Banks will be required to maintain this ratio at a minimum of 40%, meaning that they will have to issue PLN 7-8 billion of debt securities per year (i.e. by the end of 2026, Banks will have to float around PLN 15 billion of additional instruments).
- **Corporate loan portfolio.** According to the National Bank of Poland, in November 2024, the non-performing loan (NPL) ratio in the large corporate segment reached 7.5%, the highest value since April 2016. At the same time, for the first time in the available measurement history (since 2010), the value of the indicator for large enterprises exceeded the corresponding parameter for the SME sector. The NPL of large companies has increased by leaps and bounds in the space of a few months, from a near-historic low of 3.8 per cent in August 2024. The problems of several large domestic companies, including those in the chemical and transport sectors, are most often cited as the reason for the sudden deterioration in the NPL ratio. Despite the sudden increase in the NPL ratio, its level does not currently pose a systemic threat to Banks and the problems are likely to be incidental.
- **Operational digital resilience.** According to a report by Check Point Software Technologies, the financial sector ranks second in terms of the frequency of hacking attacks in Poland. Due to the growing importance of digital channels in dealing with Customers, Banks are particularly vulnerable to cyber risks. This risk has been exacerbated as a consequence of the outbreak of war in Ukraine in February 2022. In response to the growing cyber risks, the European Commission's "DORA" (Digital Operational Resilience Act) regulation came into force in 2023. The main objective of the regulation is to address the systemic risks posed by providers of key ICT services in the financial sector. The regulation consolidates regulatory requirements and introduces direct supervision of ICT providers by European financial supervisors. According to analyses conducted by the Polish Bank Association, it appears that the banking sector is well prepared for the entry into force of the regulation. The obligations imposed on the sector by DORA became effective on 17 January 2025.

Perspectives

The banking sector has had a record-breaking year in terms of net profit. According to the National Bank of Poland (NBP) net profit amounted to PLN 42.2 billion, an increase of 51% YoY. Such a good result was mainly due to the still high level of interest rates. According to economists' forecasts, in the second half of 2025 the reference rate will start to fall from 5.75% to 4.00% at the end of the year. As a result, although the performance should remain good, there is no indication that the record results can be repeated in the following year.

However, the environment in which the sector will operate remains extremely complex. Economically, GDP growth is expected to accelerate slightly to around 4%, with inflation, however, still stubbornly above the MPC's target. This has had an impact on the slower pace of monetary easing, which has supported Bank performance in the short term, but has hampered loan demand. These have had a period of stagnation, with recent months pointing to a recovery on both the household and corporate side. Contributing factors to this may include so-called deferred demand (e.g. anticipation of further housing programmes), as well as the prospect of falling rates in the near future.

In terms of portfolio quality, the sector has not seen significant turbulence in recent years. This was supported by government programmes - credit holidays, crisis shields, etc. At the turn of the year, however, there was an adverse change in the area of loans to large companies. According to NBP data, from August to November, the non-performing loan ratio in this segment rose from a near-record low of 3.8% to 7.5%, the worst result since April 2016. Currently, the portfolio of large companies shows a lower quality than that of SME loans, which is the first time this has ever happened. The sudden deterioration is mainly related to the problems of a number of large domestic companies, which may be incidental. Although the current situation does not pose a systemic threat to the sector, its development will be intensively monitored in 2025.

Staying in the credit area, the sector continues to face the problem of foreign currency mortgages. Key players are making further provisions and the number of lawsuits continues to rise. This is putting a strain on Banks, courts and Customers, involving their time and resources. Unfortunately, there is no intention on the horizon to finally resolve the problem in a statutory manner. Furthermore, the future of the WIBOR-based loan portfolio remains uncertain. Attempts to undermine this indicator are still ongoing, despite a unilaterally favourable opinion for the Banks from the regulators. The risk of a repetition of a scenario analogous to that of foreign currency lending appears to be very low, with the damage to the economy as a whole being catastrophic should it materialise.

The year 2025 also brings uncertainty in the political field, both globally and locally. It is impossible to assess precisely how a change of power in the US will affect events on the world stage. From Poland's perspective, the potential pressure for a quick end to the war in Ukraine seems most significant. An unanswered question is how a possible end to the war could affect the Polish labour market, where wage costs are already a major challenge. Locally, Poland is facing a presidential election. Depending on the outcome, the country may face increased legislative activity, possibly also directed at the banking sector.

In 2025, both the Bank and the sector enter well capitalised and prepared to support the Polish economy. For the Bank, this is the final year of the current GO beyond strategy (2022-25), whose assumptions the Bank is consistently implementing. At the same time, 2025 will be a year of work on the new strategy.



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Pillar UP

Pillar description

The GObeyond strategy is a growth strategy. Our aim is to increase the number of Customers served, strengthen our market position and increase revenue. The Bank sees potential for development in all Customer segments.

Retail Banking and Personal Finance

The priority of retail banking and PF is to achieve high Customer satisfaction (NPS Top 3 in the market), thanks to which the Bank will increase the number of Customers (by 0.5 million to 4.5 million) and increase their engagement in the relationship with the Bank. Listening to the opinions of its Customers and employees, the Bank will implement innovative products and services, often in cooperation with internal (companies from the BNP Paribas Group) and external partners, and plans to make even greater use than before of personalised communication based on advanced CRM and data analytics. Further digitalization of Customer processes is planned, together with remote access to the Bank's experts as part of a newly created omnichannel sales and Customer service model (over 90% of key processes for retail Customers are to be available in remote channels, and sales via digital channels are expected to exceed 50%). The Bank will also offer Customers services that go beyond traditional banking, such as open banking solutions, contextual financing in e-commerce, or offering products and services related to Sustainable Development Goals. Finally, the Bank plans active but sustainable growth in the main areas of retail banking, i.e. achieving a 7% share in the market of new sales of accounts, cash loans, and mortgage loans.

SME, Corporate and CIB Banking

The Bank aims to be number 1 for international Customers (increase in the number of active Customers by over 22% vs. 2021) by utilising the position of the BNP Paribas Group as a leader in Europe with a broad global presence, and global solutions, products and expert knowledge. The Bank strives to be the first-choice bank for large corporations with tailored solutions and an excellent service model. The Bank will provide service to Customers from the Polish corporations and SME segment using remote and digital solutions, while supporting the international expansion of our Customers based on experiences from other countries. The Bank wants to increase the base of active Customers served in the SME and corporate banking segment by over 18% compared to 2021. It will also strive for operational excellence to build positive Customer experiences. One of the key goals in this area is to optimise and shorten the credit process. The Bank will leverage its leading market position in the agricultural segment and its unique competencies in this area to strengthen its market position among food processors.

Strategic commitments and their implementation

Indicator	Strategic objective 2025	Implementation 2024
NPS - Retail Banking and Personal Finance	TOP 3	6 th place
% of key processes for the retail Customer available through remote channels	90%	87%
Number of Customers (private individuals and micro businesses)	4.5 million	4.0 million
Sales through digital channels (Retail Customers)	>50%	64%
Market shares in new sales (ROR accounts, cash loans, mortgages)	7%	ROR – 3.7% cash loans – 3.4% mortgage loans – 1.2%
Number of active micro companies	340 thousand	276 thousand
Number of micro companies active in digital channels	230 thousand	189 thousand
Maintaining leadership in the farmers' segment (market share in loans)	>25%	24.4%
Increase in the number of active food processors [vs. 2021]	+30%	+34%
Increase in the number of active Customers (banking corporate and SMEs) [vs. 2021]	>18%	+7%
Increase in the number of active international Customers [vs. 2021]	>22%	+26%
Number of Customers active in digital channels (corporate and SME banking)	37 thousand	31 thousand
Increase in credit volumes (banking corporate and SMEs)	+6% annual average [2025-2021]	+5% annual average [2024-2021]



Segment description

Retail and Business Banking & Personal Finance Area

Characteristics of the area

The Retail and Business Banking area provides services to retail Customers, Private Banking services, and serves business Customers (micro-businesses). The following Customer segments are served within Retail and Business Banking:

Retail Customers:

- Mass Customers,
- Premium Banking Customers, i.e., placing assets of at least PLN 100,000 in the Bank or through its intermediation, or having the inflow of funds of at least PLN 10,000 per month,
- Private Banking (Wealth Management) Customers, i.e., placing assets of at least PLN 1 million through the Bank. A "Family Fortunes" sub-segment is identified under Private Banking – Customers who place assets of at least PLN 10 million through the Bank.

Business Customers:

- non-Agro, not keeping full financial reporting according to the principles defined in the Accounting Act, meeting the criterion of net annual income for the previous year below 2 million euros,
- non-Agro, keeping full financial reporting, whose net sales income for the previous financial year was less than PLN 4 million, and credit engagement does not exceed PLN 1.2 million,
- Agro, not conducting full financial reporting, meeting the criterion of net annual income for the previous financial year below 2 million euros, conducting activities classified according to selected PKD 2007 codes,
- professionals: entrepreneurs not conducting full financial reporting in accordance with the principles of the Accounting Act, conducting professions defined in a separate internal document,
- individual farmers, for whom the Bank's credit commitment to the Customer is less than PLN 3 million,
- individual farmers, for whom the Bank's credit commitment to the Customer is in the range of PLN 3 million and below PLN 4 million, when the collateral on agricultural land covers at least 50% of the credit commitment,
- on-profit organisations (e.g., foundations, associations, trade unions, etc.),
- cooperatives, housing communities, property managers.

Private Banking - BNP Paribas Wealth Management offers an individual approach to each Customer and additional holistic and relational approach, i.e., the "family approach", which also includes close family members or assets gathered in private

companies and other investment vehicles. BNP Paribas Wealth Management benefits from 40 years of experience in serving affluent Customers, market position and best practices of the BNP Paribas Group, which is number 1 in Wealth Management in the Eurozone.

For over 10 years, BNP Paribas Wealth Management in Poland has been supporting Customers in matters related to estate planning and collaborates with Customers' legal and tax advisers in succession planning – it can boast the title of a precursor of the family office service on the Polish market. It offers one of the richest products and services portfolio available for Family Foundations – including entities in the organisation, i.e. yet to be registered by the court.

Customers of BNP Paribas Wealth Management are served by an experienced and qualified team - all advisers are EFPA certified at the EFA level and the highest – EFP. Holding an EFPA certificate is crucial and required for a Wealth Management adviser position. At the same time, Wealth Management advisers are the first in Poland to achieve EFPA ESG certification in the area of sustainable development.

The **Personal Finance Banking** area is responsible for product offer and management of consumer loans distributed through the Retail and Business Banking branch network and external distribution channels. This area offers Customers the following product groups: cash loans, credit cards, instalment loans, car loans, leasing (operational and financial) and leasing loans (mainly in cooperation with BNP Paribas Leasing Services Sp. z o.o.) and long-term vehicle rental (offered in cooperation with Arval Service Lease Polska Sp. z o.o.).

Implementation of key strategic initiatives in 2024

INITIATIVE	BNP Paribas - my main Bank
INITIATIVE DESCRIPTION	More attractive products, implementation of an omnichannel environment and changes in the approach to building lasting relationships. Optimisation of digital UX, enhanced personalisation of Customer experiences and synchronisation of data source use. Increase in BNP Paribas brand awareness among Customers
ACHIEVEMENTS	<ul style="list-style-type: none"> • implementation of a new form of canvassing based on a debit card: tennis (with an Olympic competition and discounts on tennis courts) and "Account with a Card for Influentials" as part of the #INFLUENCERS campaign • promotion and increase in Customer use of the "Priceless Moments" loyalty programme • new functionalities in remote channels: the possibility to change the tariff plan held, information on the promotion currently held and the possibility to submit an instruction in the event of death • use of the mObywatel application and diia.pl (for Ukrainian Customers) in the process of onboarding Customers in a branch • allowing Customers who have an attachment on their account to withdraw funds via a card issued to the account (KWZ)
KEY FIGURES	<ul style="list-style-type: none"> • an increase in the share of mobile transactions in card transactions by 4.4 p.p. YoY • 21.6 thousand - sale of personal account with offer of 8% on deposit account



INITIATIVE	BNP Paribas - my main Bank
KEY FIGURES	<ul style="list-style-type: none"> • 16.9 thousand - sale of account with Visa Film card • 11.1 thousand - Visa Tennis card account sales • 8 thousand - sale of "Account with influencers card" • 5.3 thousand - number of accounts opened with diia.pl as second identification document

INITIATIVE	Development of sales in the digital and omni-channel model
INITIATIVE DESCRIPTION	Sale of all consumer loans and mortgages through digital channels or omni-channel model. Widespread use of 'pre-approved' offers and open banking solutions. Increase sales to the Customer base based on data analytics, AI and personalisation. Expansion of product offerings available in digital channels
ACHIEVEMENTS	<ul style="list-style-type: none"> • making the cash loan available on the website for new Customers of the Bank - 100% remotely, using income verification through open banking • enabling the conclusion of a cash loan agreement in the GOMobile application for loan applications submitted during a phone call with a Bank Advisor from the Remote Sales team • making card repayments and instalments available with BLIK in the GOMobile application and activation of the mobile application on a further device using a QR code • the possibility of applying for a suspension of repayment of up to 3 instalments on consumer and mortgage loans and making use of the Borrower Support Fund for those affected by the flooding in southern Poland • extension of the possibility of income verification through open banking also in the branch and Remote Sales (application during a phone call) • digitisation of the delivery of selected documents for mortgage processing (including energy certificates for the so-called green mortgage) and revolving overdraft processes • implementation of PESEL identification number verification for all Bank products • new functionalities of the mamGO platform (through which Customers may purchase a car - new or used, and use a loan from the Bank, leasing from BNP Paribas Leasing Solutions or a rental offer from Arval Polska) - the possibility of financing cars after the lease period with leasing and the FLEX offer, i.e. a short-term lease with the possibility of terminating the agreement at any time, both for new and used cars • making applications for mortgage credit holidays available through remote channels • enabling the linking and filtering of card transaction history, providing Visa Film Card application, insurance information for car loans and prompts for updating contact details in GOonline • implementation of the VISA Platinum card in GOMobile and GOonline and automation of limit increases for existing credit cards • a new onboarding process in digital channels for Customers applying for instalment loans with Bank Partners.

INITIATIVE	Development of sales in the digital and omni-channel model
KEY FIGURES	<ul style="list-style-type: none"> • approx. 140 thousand cards (credit and debit) added to the "Priceless Moments" programme • an increase of approximately 55% in sales of the VISA Platinum card YoY and an increase in the share of new sales of the VISA Platinum card from 17% to 26% YoY • 90% of agreements in instalment credit are paperless (including 30% signed on the GOMobile app).

INITIATIVE	Convenient platform for entrepreneurs using API solutions
INITIATIVE DESCRIPTION	Bank as a modern platform using APIs to offer products and services from external partners. Supporting the creation of sustainable, secure and innovative services tailored to Customers' needs. The API enables contextual services to be offered at selected Customer touch points outside the banking ecosystem
ACHIEVEMENTS	<ul style="list-style-type: none"> • Start TwojeGo Biznesu - an offer for Customers entering the market available from May 2024. A programme of comprehensive support in every aspect of setting up a business, it includes, among others, assistance in registering for VAT and ZUS, access to professional business and accounting tools in the GOKsięgowość service and training with a market value of PLN 5,000 • GOKsięgowość - online accounting services for Customers running their own business (including a debt collection services module). The service is available 24/7, and registration and signing of the contract take place without a visit to an accountant's office or an office • GOdealer - a currency exchange application with 24/7 transaction processing. Business Customers can also benefit from a dual-currency depository • Axepta - a payment gateway for Customers, with access to various forms of payment, i.e. quick transfer, BLIK, card payments, including electronic wallets (Apple Pay and Google Pay) • cooperation with Arval - providing Customers with a tailored long-term rental offer thanks to the use of an AI model that predicts potential rental interest and a comparison engine that clearly shows the benefits and differences of the various offers: leasing, rental, car loan. The rental service is available on GOonline and GOMobile • cooperation with BNP Paribas Leasing Solutions - wide range of green financing, also with attractive EIB financing for photovoltaics, heat pumps, charging stations and energy storages • cooperation of the Bank and BNP Paribas Leasing z FinTechem Monevia (leader in online micro factoring) - an offer of complete factoring solutions on preferential conditions, regardless of the industry, size or market seniority of the company. Holders of a company account with the Bank benefit, among other things, from a free factoring limit of up to PLN 100 thousand to start, no preparatory commission or penalties for late payment by the counterparty - up to 30 days after the deadline • cooperation with Elavon - wide range of payment terminals (including softPOS application) • Agronomist - a portal for farmers and processors, which provides a knowledge base and practical solutions and tools, including those to support Customers in their sustainable transition (e.g.: nitrogen consumption and greenhouse gas emission calculators)



INITIATIVE	Convenient platform for entrepreneurs using API solutions
	<ul style="list-style-type: none"> • Biznes UPI – a free training programme for the Bank's Customers provided in cooperation with the Polish Enterprise Foundation on, i.a. tax changes and their impact on business, business development opportunities (also on the Internet), security in cyberspace, and legal aspects of doing business • The Carbon Footprint Calculator – an innovative service made available in partnership with Envirly, supported by artificial intelligence algorithms - enables easy calculation and management of carbon footprints and streamlines organisations' ESG reporting processes. From 1 July 2024, micro-enterprises that are Customers of the Bank can use this Scope 1 and 2 reporting tool free of charge
KEY FIGURES	<ul style="list-style-type: none"> • GODEALER: activation of the system by more than 3 thousand micro Customers in 2024; execution of more than 80 thousand transactions with a total volume exceeding PLN 1 billion • Agronomist: 362 thousand unique users visiting the platform in 2024 • Biznes UPI: 130 training courses in 2024 • Micro Leasing: PLN 311 million of financed contracts in 2024
INITIATIVE DESCRIPTION	Transformation of the distribution model - a key element in building an omnichannel Customer service model. Integration of front-end systems with a single view of the Customer. Relationship management supported by personalised CRM-based communication. New organisation of autonomous, self-organised Customer Service teams.
ACHIEVEMENTS	<ul style="list-style-type: none"> • key sales and after-sales processes available through digital channels - current level of availability: 87% for retail Customers and 66% for micro-entrepreneurs • Optichannel solutions in Customer Centres and Contact Centres, including Customer service on Customers' mobile devices. In the Bank's outlets, approximately 70% of the activities performed have a paperless digital path, including the recently implemented: Customer onboarding and remote recertification processes; which improves the Customer service process (improving NPS, eNPS), while lowering the operational costs of the processes and supporting sustainability goals. • centralisation of processes in the virtual branch for the handling of mortgage sales and after-sales processes and the handling of savings products • use of voicebot for NPS Customer surveys in the branch network and virtual branch with quality monitoring of sales and after-sales processes
KEY FIGURES	<ul style="list-style-type: none"> • 1.4 million Customers/users using mobile banking, +6% YoY • increase in the number of mobile banking logins +12% YoY (330 million in 2024) • increase in the number of BLIK payments +37% YoY (60 million in 2024) • increase in mobile payments for tickets and parking +20% YoY (2.7 million in 2024) • increase in number of GOMOBILE transactions +24% YoY

BNP Paribas Bank Polska S.A. Brokerage House

The BNP Paribas Bank Polska S.A. Brokerage House (Brokerage House) mainly serves retail Customers. The Brokerage House's services complement the Bank's range of investment products. It also has an offering for selected institutional Customers, including Open Pension Funds (OFE), Investment Fund Companies (TFI) and other entities that manage assets entrusted to them. In addition, the Brokerage House manages portfolios and provides investment advice for Customers of the Premium Banking and Wealth Management segments.

The Brokerage House offers a wide selection of investment funds managed by reputable Polish and foreign investment fund companies.

Brokerage in figures for 2024:

- conducting sales of more than 725 funds managed by 21 companies,
- PLN 10.7 billion - the value of Customers' assets in investment funds distributed through the Brokerage at the end of December 2024,
- PLN 796 million - the value of investment certificates issued in 2024 for the Brokerage's Customers in cooperation with the BNP Paribas Group (+25% YoY),
- PLN 115.6 million - total revenue from brokerage services and distribution of investment products (+28% YoY),
- a 31% YoY increase in assets in the portfolio management service for Wealth Management Customers,
- an 8% YoY increase in commission income from stock exchange transactions of the Brokerage's Customers,
- results from investment advisory services as well as portfolio management have risen well above their benchmark indices.

Table 5. Share of the Bank's Brokerage House in the turnover on the WSE

		31.12.2024		31.12.2023	
		volume	share	volume	share
Shares	PLN million	4,154.84	0.60%	2,952.78	0.50%
Bonds	PLN million	281.43	2.91%	244.64	3.03%
Contracts	units	170,468	0.64%	296,769	1.03%
Investment Certificates	PLN million	0.15	0.19%	2.16	2.71%
Options	units	21,373	5.05%	23,486	4.52%
Structured products	PLN million	291.71	5.45%	345.75	7.06%



SME and Corporate Banking area

Characteristics of the area

The Corporate Banking area directs its offer to large and medium-sized enterprises and local government units with annual net sales revenues equal to or greater than PLN 60 million, or to companies in which the Bank's lending commitment to the Customer is greater than or equal to PLN 22 million, and also to entities that are part of international capital groups.

Corporate Banking Customers are divided into four basic groups:

- polish corporations with annual net sales revenue of between PLN 60 and 600 million or with credit exposure of PLN 22 million or more (or, in the case of agricultural businesses, with credit exposure of PLN 50 million or more),
- International Customers (companies belonging to international capital groups),
- the largest Polish corporations with net sales revenues exceeding PLN 600 million,
- public sector entities and financial institutions.

Within these groups, Agro and non-Agro Customer subsegments operate.

The Small and Medium Enterprise (SME) Banking area serves three main Customer subsegments:

- Agro Customers who maintain full financial reporting with net sales revenues for the previous financial year from PLN 4 million to PLN 60 million and the Bank's credit commitment to the Customer not exceeding PLN 22 million. This subsegment also includes groups of agricultural producers (towards which the Bank's credit commitment does not exceed PLN 50 million),
- Non-Agro Customers – a sub-segment for entities with full financial reporting and net sales revenues for the previous financial year of PLN 4 million to PLN 60 million and the Bank's credit engagement not exceeding PLN 22 million, as well as public finance units with a budget of up to PLN 100 million. This sub-segment also includes churches and other religious organisations and their dependent entities,
- Farmers (i.e., corporate Customers running agricultural production) maintaining full financial reporting, with net revenues for the previous financial year between PLN 0 to 60 million and a credit commitment not exceeding PLN 50 million, as well as individual farmers, if their credit commitment is between PLN 4 million to PLN 50 million, and between PLN 3 to 4 million, if the agricultural land collateral covers less than 50% of the credit commitment.

Implementation of key strategic initiatives in 2024

Corporate Banking

INITIATIVE	New approach to the Customer using the strength and potential of the Group
INITIATIVE DESCRIPTION	A leader in the international Customer sector and in developing cooperation with largest Polish corporations. Unique approach based on the strong position of the BNP Paribas Group, especially in terms of global relations and product platform
ACHIEVEMENTS	<ul style="list-style-type: none"> • strengthening the Bank's position on the international Customer market (second place in the number of relationships) • acquisition of new business with international Customers in cooperation with the BNP Paribas Group • an increase in the share of revenue from cooperation with international Customers in total revenue • changing the operating model for Poland's largest corporations by separating managerial functions from sales functions (especially in terms of advanced and profitable transactions) • supporting Customers in their green transformation through an ecosystem of products and services as part of a beyond banking offering featuring innovative sustainability solutions including, among others, a carbon footprint calculator or ESG rating
KEY FIGURES	<ul style="list-style-type: none"> • increase in the number of active international Customers by 6% YoY (+196 YoY) • dynamic growth in loans to international Customers of 17% YoY • 8% YoY increase in the value of the portfolio under sustainable financing

INITIATIVE	New model of Customer service
INITIATIVE DESCRIPTION	Sales area transformation by providing Customers with the widest range of self-service solutions and providing a centralised and dedicated after-sales service
ACHIEVEMENTS	<ul style="list-style-type: none"> • increasing the level of automation and use of the GO Business ecosystem in Customer relationships. New functionalities in the GO Business ecosystem in 2024 (including, e.g. a new Cards module in GOonline Business, functionalities in the area of payments - import of domestic payments in Express Elixir mode, implementation of the "Create transfer to sender" functionality from the list of incoming transfers in the transaction history, possibility to generate Bank statements in XML format) • implementation of a change in the operating model in the Polish corporate segment to a turnover of up to PLN 600 million, including, i.a. the construction of homogeneous Customer portfolios, the development of a digital Customer portfolio • separation and specialisation of sector Customers (food & agro, public sector entities), optimisation of sales network • implementation of a new model for handling the KYC process for Polish corporations with revenues of less than PLN 600 million



INITIATIVE	New model of Customer service
	<ul style="list-style-type: none"> • implementation of the BNP Group's integrated onboarding model for new international Customers starting a relationship with the Group's Banks in multiple countries at the same time
KEY FIGURES	<ul style="list-style-type: none"> • increase in the number of active Customers by 4% YoY • increase in lending volumes in Corporate Banking of 4% YoY

Small and Medium Enterprises

INITIATIVE	New model of Customer service
INITIATIVE DESCRIPTION	Sales area transformation by providing Customers with the widest range of self-service solutions and providing centralised and dedicated after-sales service
ACHIEVEMENTS	<ul style="list-style-type: none"> • YoY increase in gross profit of SME Banking thanks to dynamic revenue growth and maintenance of good quality of the loan portfolio and low cost of risk • further expansion of the Digital Customer Team dedicated to Customers who prefer active remote contact with the Bank • implementation of a change in the operating model in the SME segment, including, i.a. the construction of homogeneous Customer portfolios, development of a digital Customer portfolio, separation and specialisation of sectoral Customer services, optimisation of the sales network • implementation of a new service model for the KYC process for Customers in the SME segment
KEY FIGURES	<ul style="list-style-type: none"> • 22% of Customers served in the Digital Customer Team • 12% YoY increase in revenue in SME Banking



Other business unit initiatives

INITIATIVE	ACHIEVEMENTS	INNOVATIVE PRODUCTS AND SERVICES	KEY NUMBERS
CASH MANAGEMENT	<ul style="list-style-type: none"> the development of cash management product and service offerings 	<p>CESOP (Central Electronic Payment Information System):</p> <ul style="list-style-type: none"> implementation of the FlexiPAYInfo application for handling regulatory reporting to the National Tax Administration <p>Payments:</p> <ul style="list-style-type: none"> the extension of the offer to include Express Elixir instant transfers <p>Cash Pool:</p> <ul style="list-style-type: none"> Cash Pool Reporting Services – implementing a tool for automatic generation and sending cash pool reports to Customers <p>Cash:</p> <ul style="list-style-type: none"> the extension of the offer to allow Customers to make open deposits at the Polish Post Office pilot implementation of cooperation with another provider of comprehensive cash handling services – wider offer for Customers 	<ul style="list-style-type: none"> an increase in the number of incoming transactions (incoming transfers + cash deposits) of 2% YoY
E-BANKING	<ul style="list-style-type: none"> increasing the level of automation and use of the GO Business ecosystem in relations with Customers 	<p>New features in the GO Business ecosystem:</p> <ul style="list-style-type: none"> new Cards module in GOonline Business and GOconnect Business changes and new functionalities in payments: <ul style="list-style-type: none"> SWIFTgpi for outgoing foreign payments – immediate access to settlement information Extension of Express Elixir to 24/7/365 mode, implementation of Express Elixir in GOconnect Business import of domestic Express Elixir payments "Create transfer to sender" from the list of incoming transfers in the transaction history Mass direct debit to virtual accounts in GOonline Business enabling an internal transfer in currency in GOMobile Business changes required in the transformation of payment messages (MT -> MX) in GOonline Business and GOMobile Business possibility to generate Bank statements in XML format start of work on implementing the new guarantees and letters of credit module 	<ul style="list-style-type: none"> 11% YoY increase in mobile banking users
CUSTOMER LIFECYCLE	<ul style="list-style-type: none"> significant increase in automation of onboarding and post-sales processes 	<ul style="list-style-type: none"> expanding the range of Customers eligible for fully digital onboarding implementation of an integrated model within the BNP Group for onboarding of new international Customers starting a relationship with the Group's Banks in multiple countries at the same time (electronic process) implementation of a new centralised KYC process for SME and corporate Customers up to 600 million in revenue 	<ul style="list-style-type: none"> 46% of new Corporate Customers and 21% of new SME Customers opened through a fully digital onboarding process



INITIATIVE	ACHIEVEMENTS	INNOVATIVE PRODUCTS AND SERVICES	KEY NUMBERS
FINANCING CORPORATE CUSTOMERS	<ul style="list-style-type: none"> • improvements in the credit process through the creation of an efficient and automated credit workflow that will support credit growth and asset enhancement with an optimal level of credit risk • implementation of a pilot credit process for SME Customers using an automated decision-making engine • implementation of the regulatory changes arising from the CRR3 Directive 	<ul style="list-style-type: none"> • changes to the credit workflow for SME Customers, including individual farmers, and for Corporate Customers (with the exception of the credit process for specialised financing) 	<ul style="list-style-type: none"> • 2,952 credit decisions made in the new credit process and 47,400 orders to credit administration

Food & Agro Area

Area description

BNP Paribas Bank Polska S.A. (the Bank) for the agri-food sector has a comprehensive product offering, including: current accounts, term deposits, loans and insurance for farmers (voluntary and mandatory).

Micro Customers and Small and Medium Enterprise Banking

In terms of lending activities, the Bank's offering includes loans:

- operational, including the Agro Express secured overdraft and the loan with a BGK guarantee and interest rate subsidies,
- investment loans for farmers and Agro companies, including Agro Progres, Unia+ (to co-finance EU projects), a loan with a BGK guarantee and interest rate subsidies,
- preferential loans with interest rate subsidy or partial capital repayment (thanks to the agreement with the Agency for Restructuring and Modernisation of Agriculture).

In addition to its own offerings, the Bank, in cooperation with external companies, prepares dedicated offers for farmers concerning additional services, such as Generali Agro insurance and runs sales campaigns.

Corporate Banking Customers

The Bank's activities for Corporate Banking Customers focus on:

- business development by utilising unique knowledge and a precise understanding of the entire sector value chain (farmer, processor, distributor, consumer) and sector ecosystem (macro environment, policy, technology, international trade, suppliers, Customers), including the development of cross-segment financing (value chain financing),
- preparation of sector analysis, including changes in industry trends,
- initiating cooperation with the BNP Paribas Group in the field of agri-food sector Customers,
- sector recommendations for significant credit transactions (company positioning in the industry and peer group),
- operation and development of the Agronomist platform providing reliable knowledge and useful tools for the digital and sustainable transformation of the agri-food sector.



Implementation of key strategic initiatives in 2024

INITIATIVE	Agronomist - an innovative way to build relationships and sharing knowledge
INITIATIVE DESCRIPTION	Creation of a portal for farmers and entrepreneurs from the Food & Agro (F&A) sector wishing to develop in line with market trends. Providing knowledge and tools to support both the transformation towards sustainable agriculture and digital transformation. The portal's content covers the entire F&A value chain with special attention to local communities
ACHIEVEMENTS	<p>Provision of new, unique-on-the-market tools and features that meet the needs of entities operating in the agri-food sector:</p> <ul style="list-style-type: none"> • Field card - preparing for the implementation of a new tool for reporting on agronomic treatments, purchase, sales and cost data, with the possibility of generating reports - in response to farmers' needs. The first version of the tool was presented at the largest agricultural fair AGRO SHOW • ESG materials - preparation and publication of materials related to environmental and social impact reporting in accordance with the CSRD for the food production value chain • PULS AGRO - video materials prepared together with experts about the current situation on the fields in various regions of Poland • Agronomist - a tool available from the GOone Advisor panel • Creditomat - reinstatement of the tool - the result of a final decision on the 'farmer-consumer' bill
KEY FIGURES	<ul style="list-style-type: none"> • 362 thousand unique visitors to the portal in 2024 • over 910 thousand hits in 2024.

INITIATIVE	Knowing the Customer as the basis for building profitable relationships and increasing their satisfaction
INITIATIVE DESCRIPTION	Further, industry knowledge-based expansion in the area of the food production value chain. Adapted service model for current and future key F&A sector Customers. Improvements in the credit process

INITIATIVE	Knowing the Customer as the basis for building profitable relationships and increasing their satisfaction
ACHIEVEMENTS	<ul style="list-style-type: none"> • deeper market analyses and selected agri-food subsectors; organising sessions on specific food market areas for Customers and prospects • development and publication of overviews of the agri-food sector for extensive use on both the business and credit risk sides. • further analytical activities and sharing knowledge related to the market implications of the war in Ukraine • active and substantive participation in numerous economy-wide and sector-specific events, close cooperation with a number of trade organisations from the agri-food sector
KEY FIGURES	<ul style="list-style-type: none"> • 8% YoY increase in the number of active food processors • 1% YoY increase in deposit balances in the Corporate Banking segment

Other business line actions

Preferential loans - due to the constraints on the agricultural market caused by the war in Ukraine, two lines of preferential loans were launched in 2023 to improve the liquidity of farmers and buyers with a deadline of 31 December 2023. In March 2024, the Decree of the Council of Ministers extended the deadline for granting lines S and UP until 31 December 2024.

- **Liquidity maintenance loans (UP line)**, granted on the following terms:

- interest rate: variable - WIBOR 3M increased by the Bank's margin no higher than 3 p.p.;
- the borrower pays an interest rate of 2%, the remaining part is subsidised by the ARiMR;
- subsidy period: up to 60 months;
- maximum loan amounts dependent on farm size - PLN 100 thousand for farms below 50 ha, PLN 200,000 for 50-100 ha farms, and PLN 400 thousand for farms above 100 ha.

In 2024, 9,700 loans were granted for a total of PLN 1.08 billion.

- **Loans related to the purchase of grains, seed material of agricultural plants, and soft fruits (S line)**, granted to SMEs (as defined by the European Commission, with fewer than 250 employees and an annual turnover of less than EUR 50 million and/or a total annual balance sheet not exceeding EUR 43 million). They are granted under the following conditions:

- loan amount: up to PLN 40 million;
- maximum loan period: up to 18 months;
- interest rate: variable - WIBOR 3M increased by the Bank's margin no higher than 2.5 p.p.;



- the borrower pays an interest rate of 2%, the remaining part is subsidised by the ARiMR;
- the amount of fees and commissions on the Bank's behalf related to the bank loan, including those collected from banking operations during the lending period, cannot exceed 1% of the granted loan amount.

In 2024, 67 contracts were concluded for a total of PLN 324.4 million.

Investment loans with Agromax guarantee (FGR Plus) - in August 2024, the Bank's offer was extended to include a loan with an interest subsidy secured by an Agromax guarantee from the Fund for Agricultural Guarantees Plus (FGR Plus). This financing is available thanks to an agreement with Bank Gospodarstwa Krajowego, which allows us to act as an intermediary for the public support provided for in the Strategic Plan for the Common Agricultural Policy 2023-2027.

- **Agromax guarantee** as security for the repayment of the investment loan and the related working capital loan:
 - guarantee coverage of up to 80% of the loan amount,
 - free of charge for the entire duration of the loan,
 - the guarantee formalities are carried out at the Bank,
 - possible as the only collateral when financing investments in photovoltaics and core stock.
- **Investment loan** with Agromax guarantee and subsidy:
 - interest subsidy of up to 8 bps, for 2 years from the start of the loan,
 - deductible from 10% (from 0% for small farms for loans of up to PLN 200 thousand to finance agricultural machinery and equipment),
 - a margin for lending lower by at least 0.2 p.p. compared to commercial financing,
 - a loan term of up to 15 years,
 - grace period for capital repayment of up to 2 years,
 - repayment frequency adapted to the seasonality of production.
- **Flexible loan** - overdraft facility for Micro Customers, introduced in November 2024:
 - intended to finance the day-to-day operations of the Borrower,
 - allows flexible management of funds - each deposit into the account restores the current limit by the amount of the deposit made,
 - loan amount PLN 10 thousand - 2 million,
 - loan period 12-84 months,
 - fixed repayment schedule - every month/quarter, the amount of the allocated limit is reduced by the instalment indicated in the contract,

- an increase in the amount of the loan to the original financing amount - after examination of the creditworthiness, at the earliest after 12 months of on-time repayment.

Adjusting the product offer to the requirements of the Consumer Credit Act (UKK)

The amendment to the Consumer Credit Act came into force on 7 January 2024, which covered loan agreements made with individual farmers. According to the act's provisions, farmers were granted consumer protection, the same as for retail Customers. This required the implementation of many changes in legislative, process and tool areas. Some of the most essential products have been adapted to the act's requirements, therefore ensuring the continuity of Customer service.

The Act of 20 March 2024 amendment of the civil code, Consumer Credit Act and the act on consumer pawn loan have removed provisions including individual farmers in the UKK regime. As a result, products offered before January were returned to the Bank's offer from 2 May.

Insurance – cross-sell

Crop insurance sales campaigns with premium subsidies from the state budget in 2024:

- spring (March-June) - 2.7 thousand policies concluded for a total premium of PLN 12.2 million,
- autumn (September-November) - 1.85 thousand policies concluded for a total premium of PLN 16.5 million.

Agro Community – a new internal Bank initiative

Objectives of the creation of the Community:

- promotion of Agro as a viable source of business,
- providing knowledge of the agri-food sector to all Bank employees, especially those working with Agro Customers,
- improving the Agro Customer experience, through closer cooperation between all areas of the Bank translating the experience from the 'front line of sales' into tactical action by the Head Office units,
- the creation of a platform for the exchange of knowledge and experience with all participants in Agro's Customer service processes.

Community activities to date:

- November - inauguration of the Agro Community,
- December – first study visit to Customer (orchid manufacturer),
- "We keep our finger on the pulse" meetings - agricultural market analysts share information on the current situation in selected sectors of the agri-food sector (every 2 weeks),
- a monthly newsletter with up-to-date information, plans and summaries.



Corporate and Institutional Banking area

Area description

The Corporate and Institutional Banking (*Corporate and Institutional Banking*) (CIB Area) provides a broad product offering aimed at both the largest Polish enterprises and medium-sized companies. The Trust Services Department also addresses its offer to insurance companies as well as pension and investment funds.

The CIB Area provides Customers with comprehensive BNP Paribas Group solutions in terms of financing and risk management, including:

- mergers and acquisitions and restructuring advisory,
- capital market transaction advice and arrangement,
- currency and money market transaction arrangement,
- working capital financing,
- acquisition and investment project financing,
- cash flow, financial liquidity, and working capital optimisation management,
- sales of financial market products, hedging currency, interest rate, and commodity price risks.

In addition, tasks are carried out in the field of market risk management in the trading book, quotation of prices of foreign exchange market instruments and interest rate market instruments (including derivative market transactions), as well as determining the Bank's foreign exchange rates table and structuring risk management associated with the Bank's offering of structured products.

Implementation of key strategic initiatives in 2024

INITIATIVE	New approach to the Customer leveraging the strength and potential of the Group
INITIATIVE DESCRIPTION	Leader in the international Customer sector and in developing cooperation with the largest Polish corporations. A unique approach based on the strong position of the BNP Paribas Group, especially in terms of global relationships and product platforms.
ACHIEVEMENTS	<ul style="list-style-type: none"> • increase in cross-sell with international Customers through sales activities aimed at decentralising market risk management competencies • leveraging the BNP Paribas Group's position and developing global relationships resulting in closer cooperation with international Customers • first two contracts for Kantox platform services (currency risk management automation tool) signed with international Customers

INITIATIVE	New approach to the Customer leveraging the strength and potential of the Group
KEY FIGURES	<ul style="list-style-type: none"> • significant increase in the number of Customers carrying out transactions via electronic channels (+10% YoY) • significant increase in NBI on derivatives (+12% YoY) as a result of an increase in the number of active Customers

INITIATIVE	New Customer service model
INITIATIVE DESCRIPTION	Transformation of sales area by providing Customers with the widest range of self-service solutions and ensuring centralised and dedicated post-sales service.
ACHIEVEMENTS	<ul style="list-style-type: none"> • changes in the sales network, adapting its structure to the evolving model of corporate Customer service, and to the specificity of the conducted business
KEY FIGURES	<ul style="list-style-type: none"> • increase in the number of active Customers (+2% YoY) • increase in the number of transactions in the FX Pl@net application (+8% YoY)

Other banking activity

The remaining banking activity of BNP Paribas Bank Polska S.A. (the Bank) is operationally carried out mainly within the Asset and Liability Management Division (ALM Treasury Division). The task of the ALM Treasury Division is to ensure the proper and stable level of financing that allows the Bank to operate safely while complying with the legal norms and limiting the Bank's interest result sensitivity to the volatility of market interest rates.

The ALM Treasury Division combines the function of a business line and a competence centre responsible for managing:

- interest rate risk,
- the current and structural liquidity of the Bank,
- structural currency risk,
- internal transfer prices for all deposit and loan products offered by the Bank (including their determination).

Tasks carried out within the ALM Treasury Division include both a prudential aspect (compliance with external regulations and internal directives) and an optimisation aspect (managing financing costs and generating results from managing positions in the Bank's balance sheet).



One of the key risk management mechanisms in the Bank is the systemic transfer of structural risks from all business lines to the ALM Treasury Division. Structural risks are: currency, liquidity and interest rate risks in the banking book. The ALM Treasury Division centrally manages these risks. Risk transfer is primarily carried out within the transfer pricing system, which reflects the strategy of financing the Bank's activities and developing the Bank's balance sheet.

The main duties of the ALM Treasury Division include ensuring: a balanced liquidity position while optimising the cost of financing the Bank's operations, and an appropriate structure of assets and liabilities, including sensitivity to changes in interest rates. Other functions of the ALM Treasury Division include:

- management of the internal transfer pricing system,
- balancing analysis,
- modeling and monitoring of liquidity and interest rate risks for the banking book,
- issuance of the Bank's debt securities,
- organising long-term credit lines,
- raising financing sources,
- cooperation with business lines supporting sustainable development,
- coordination of the securitisation transactions of the non-bank Customer's loan portfolio,
- organisation of the Asset and Liability Management Committee (ALCO) operations.

The Bank adjusts internal product behavioural models affecting the Bank's interest rate and liquidity risk profiles on an ongoing basis. The ALM Treasury Division cooperates with business lines by organising regular meetings and consultations to optimise the Bank's product structure and maintain the Bank's profitability at the highest possible level in current macroeconomic conditions.

Cooperation with financial institutions

As of 31 December 2024, the Bank maintained correspondent relationships with 1 thousand Banks, including 63 NOSTRO accounts in other banks for 21 major currencies.

The Bank operates 46 LORO accounts exclusively in PLN for foreign banks in the BNP Paribas Group. LORO accounts operated in the Bank's books represent an external source of obtaining free operating funds for the Bank's operational needs. Above all, these accounts are used to make Customer transfers and bank-to-bank transfers.

In 2024, the Bank continued its cooperation with other domestic and foreign financial institutions, brokers and banks, which allowed for a wide range of treasury and deposit transactions. Several agreements with new and existing contractors from these segments were signed, and steps were taken to introduce new agreements, in line with ISDA and 2023 ZBP recommendations.

Agreements with the National Bank of Poland

- Agreement to act as a Money Market Dealer
- Agreement on the terms and conditions for opening and maintaining a Bank account in the SORBNET2 system
- Cash storage agreement

Distribution channels

Sales network

As of 31 December 2024, the Bank had 363 Customer Centres (including 11 partner branches). The network of Customer Centres was complemented by 16 Wealth Management Centres.

In 183 Customer Centres (including 2 partner branches), cash service was provided exclusively by self-service devices.

All of the Bank's Customer Centres have the OK SENIOR® Certificate, confirming that senior Customers (60+) are serviced in branches in a safe, understandable and accessible manner; and 143 outlets hold the 'Barrier-Free Facility' Certificate, issued by the Integration Foundation for good practices in servicing disabled people.

The Customer Centres are responsible for providing full service to retail Customers including Mass, Premium and Micro Customers.

The sales network is managed within the Retail and Business Banking Customer Division, which is also responsible for the product offering and services offered to retail Customer segments in Customer Centres, including the service model.

For Wealth Management segment Customers, both the Wealth Management Centres and the range of products and services offered to this segment are managed by the Wealth Management Division.

The current branch network and management structure enables effective sales management, increasing the quality of Customer service in a manner tailored to Customers' expectations and quickly addressing the needs of Customers in given segments.

In 2024, the sales network in Corporate Banking and SMEs comprised:

- Strategic Customers Division, organised within the head office structure, which is responsible for relations with international Customers, Poland's largest corporations (with net sales revenue in excess of PLN 600 million), as well as financial institutions and selected public sector entities;



- SME and Corporate Customers division, which manages the regional sales network for Corporate Customers with net sales revenues of between PLN 60 and 600 million (Commercial Customers) and the regional sales network for SME Customers.

Additionally, within the SME and Corporate Customers Division, the sales network was made up of:

- for Corporate Customers with net sales revenues of between PLN 60 million and PLN 600 million - two Corporate Banking Regions: Eastern and Western bringing together a total of 10 Corporate Banking Centres in major cities;
- for SME Customers - two SME Banking Regions: Eastern and Western bringing together a total of 22 specialised SME Business Centres, located in cities with the greatest economic potential. As of January 2025, the number of SME Business Centres has been reduced by 3 as a result of the further transformation of the sales network.

Within the SME and Corporate Customers Division, there is also the Sector Customers Department, established in January 2024, which is responsible for relations with Customers in the agricultural sector, public sector companies and innovative Customers, and the Digital Customers Team, which develops cooperation with Customers who prefer remote service using online and mobile banking channels.

This structure of the sales network allows the Bank to specialise even more on a given Customer group and thus improve the quality of the products and services offered and better tailor them to the specific needs of Customers in particular for companies in the agricultural and public sectors.

The Bank's service model for Corporate and SME Customers is a relationship model. At its core is individual service and care from the Advisor, who is responsible for the entire relationship and cooperation of the Customer with the Bank. Furthermore, in order to fully meet the needs of Customers, as part of the Bank's wide range of products and services, teams of specialists are dedicated to serving Customers, including SMEs, offering a high standard of sales service and product advice, based on knowledge and experience in cash management, treasury, leasing, factoring and trade services and financing.

An important element of access to the products and services offered is the state-of-the-art online and mobile banking systems offered as part of the GO Biznes ecosystem dedicated to SME and Corporate Customers.

The distribution channels of the sales network are complemented by after-sales Customer service, which is provided through dedicated Customer Service Offices.

Cooperation with brokers

At the end of December 2024, in the Retail and Business Banking Division, the Bank collaborated in the acquisition of banking products based on:

- outsourcing contracts - with 14 external outsourcing intermediaries, 1 outsourcing broker acting exclusively for the Bank and 10 franchise partners,
- marketing contracts - with 91 counterparts.

In the B2C Sales Development Division, on the other hand, with regard to the acquisition of banking products, the Bank cooperated, on the basis of outsourcing agreements, with 17 external brokers.

Automated teller machine (ATM) and cash deposit machine (CDM) network

As of 31 December 2024, the Bank's Customer centres were operating:

- 562 dual-function devices carrying out contactless deposits and withdrawals with the Bank's cards and using BLIK, as well as cash withdrawals using Google Pay and Apple Pay; and
- 2 ATMs handling only standard withdrawals and transactions provided by the VISA and Mastercard systems.

In addition, 10 dual-function machines and 2 ATMs were operating outside the Bank's Customer Centres.



Operations and business support area

Implementation of key strategic initiatives in 2024

INITIATIVE	Process Excellence
INITIATIVE DESCRIPTION	Optimisation, automation and digitalisation of all key processes, thus enhancing Customer service quality and cost efficiency. Developing process mining to assist process owners in process management. Promoting Lean culture and continuous process improvement by creating a dedicated training programme and Lean community
ACHIEVEMENTS	<ul style="list-style-type: none"> • implementation of a New Operating Model to support the Bank's strategy. Focusing on the measurable value delivered to the Customer by organising work in product/process circles and consolidating the operational area of Customer Financial Security Management. • implementation of artificial intelligence-based solutions to improve the handling of fraudulent transaction reporting processes and mortgage servicing - models that classify and extract data from documents provided by Customers, increasing cost and resource efficiency • robotisation of processes across the Bank increasing efficiency: including in retail, corporate, clearing and compliance processes • automation of the process for handling new types of settlements for CHF housing loans • development of a tool for recording competences and monitoring staff development (Upskilling and Reskilling) • begin work to optimise the Bank's portfolio of supported products (aspiration to reduce the number of retail products by 70% and corporate products by 40%). Complete product inventory with the creation of a scoring model
KEY FIGURES	<ul style="list-style-type: none"> • increase in multiskilling of employees (acquisition of new skills and functions and expansion of those already acquired by developing the scope and level of competence) - 37% of multiskilling employees • 233 active robots, 33 new robots in 2024 • increase in operational efficiency by 10%

Entities of BNP Paribas Bank Polska S.A. Group

BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A.

BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A. (BNPP TFI, the Company) has been operating in the financial services sector since 1992, previously functioning on the Polish capital market as a brokerage house.

BNPP TFI operates based on the permission of the Polish Financial Supervision Authority in the field of creating and managing investment funds, as well as intermediation in selling and repurchasing units and shares of foreign funds.

In 2024 the following significant events took place in the Company's operations:

- 59% YoY increase in assets under management;
- the most popular TFIs on offer were ESG BNPP Global Debt Strategies Universal (net inflows of PLN 2,032 million) and BNP Paribas Corporate Bonds (net inflows of PLN 924 million);
- at the end of 2024 28.1% of the net assets managed by the Company were placed in sub-funds applying ESG-based investment policies;
- on 6 December 2024, in connection with the position of the Financial Supervision Authority regarding the information published by investment funds, changes were made to the investment policies in the statutes of the Funds managed by BNP Paribas TFI S.A. Together with the change of investment policies, the names of the 11 Sub-Funds managed by the Company were also changed.

At the end of December 2024, the Company managed the following funds:

- BNP Paribas FIO – launched in March 2016. This fund comprises 7 sub-funds (including two sub-funds applying an investment policy based on ESG principles) with diversified investment policies that enable Customers to invest in various asset classes both locally and globally. The BNP Paribas FIO also includes an Individual Retirement Account: BNP Paribas - IKE and an Individual Retirement Security Account: BNP Paribas - IKZE. The value of the fund's assets at the end of 2024 was PLN 1,383 million.
- BNP Paribas Parasol SFIO – there are 9 sub-funds within the fund, including 6 sub-funds applying an investment policy based on ESG principles. The value of the fund's assets at the end of 2024 amounted to PLN 2,304 million.
- BNPP FIO – established in 2005. This fund comprises 3 sub-funds (including one sub-fund applying an ESG-based investment policy). The value of the fund's assets at the end of 2024 PLN 4,114 million.
- BNP Paribas PPK SFIO – created to offer Customers employee capital plans, with 9 sub-funds (so-called defined date) separated. The value of the fund's assets at the end of 2024 amounted to PLN 397 million.
- BNP Paribas Premium SFIO in liquidation – created in July 2014, with 4 sub-funds separated. The management of the fund was taken over as a result of the merger with Riviera TFI.
- FWR Selective FIZ in liquidation - created in May 2014, the management of the fund was taken over as a result of the merger with Riviera TFI.

BNPP TFI cooperates with the Bank in the distribution of units of funds offered by the Company on the basis of an agreement between the Bank's Brokerage Office and the Company.

In 2024, the Company recorded net inflows of funds of PLN 2,676 million.

**Table 6. Basic financial data of BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A.**

PLN thousand	31.12.2024	31.12.2023	Change YoY	
			PLN thousand	%
Total assets	48,992	41,396	7,596	18.3%
Long-term investments	509	464	45	9.7%
Equity, including:	38,886	30,391	8,495	28.0%
net financial result	8,465	808	7,657	947.6%

BNPP TFI has share capital of PLN 16,692.9 thousand divided into 695,538 shares with a nominal value of PLN 24 each. The level of equity as of 31 December 2024 amounted to PLN 38.9 million and is sufficient to safely conduct day-to-day operations.

The company achieved a net financial result of PLN 8.5 million in 2024 (against PLN 0.8 million in 2023).

BNP Paribas Leasing Services Spółka z o.o.

BNP Paribas Leasing Services Sp. z o.o. (the Company), in cooperation with the Bank, offers Customers from micro-enterprises, Personal Finance, SME and corporate Customers a full range of leasing products. Since 2018, based on the decision of the Bank's Management Board, the Company has taken on the role of the only entity in the BNP Paribas Bank Polska Group that provides leasing services for Customers in the above-mentioned segments, dynamically increasing the scale of its operations each year.

Table 7. Basic financial data of BNP Paribas Leasing Services Spółka z o.o.

PLN thousand	31.12.2024	31.12.2023	change YoY	
			PLN thousand	%
Total assets	7,207,866	6,662,226	545,640	8.2%
Long-term investments*	6,939,722	6,409,080	530,642	8.3%
Equity, including:	109,900	84,160	25,740	30.6%
net financial result	25,741	25,694	47	0.2%

* receivables from granted financing

The beginning of 2024 was a continuation of the previous year's sales challenges for the Company. The Personal Finance segment, in particular, recorded very good results benefiting from strong market growth in the passenger car sector. The Corporate Customers segment also performed well during the period, starting the year with high sales volumes, completing a series of high-volume transactions with key Customers. At the same time, the Small and Medium Enterprises and Microenterprises segment ended the year below expectations.

Thanks to a strong sales performance, the portfolio of financed assets at the end of December 2024 reached a record level of PLN 6.9 billion (up 8% compared to December 2023). In 2024, the Company concluded almost 22 thousand new contracts amounting to PLN 4,010 million (volume growth of 7% YoY) and recorded a net profit of PLN 25,741 thousand, consistently increasing the level of equity.

Over the same period, the Company's administrative costs increased by only 2.4 per cent, which is slower than inflation, which affects staff costs and the costs of external suppliers. This low increase in costs relative to asset growth has been achieved due to the Company's consistent strategy of increasing efficiency and structural investments in previous periods allowing a larger portfolio to be serviced with fewer resources. The portfolio's credit risk is stable, generating a charge to the bottom line below forecasts. In 2024, the quality of the loan portfolio remains very good, despite high interest rates and reduced ability of Customers to settle their receivables.

Initially, the Company's operations were financed by BNP Paribas S.A. in Paris. In December 2021, an additional loan agreement was signed with BNP Paribas Bank Polska S.A. for PLN 1 billion. In November 2023, an annex was signed increasing the limit to PLN 2.5 billion and then in July 2024 to PLN 3.5 billion. In addition, in June 2021 the Company signed an agreement with the European Investment Bank for a financing amount of EUR 200 million using the entire available line with the end of 2024. Negotiations with the EIB for the activation of another non-revolving credit line have now resumed.

Table 8. Financing structure of BNP Paribas Leasing Services Spółka z o.o. as of 31.12.2024

PLN million	amount in PLN	PLN	EUR
BNP Paribas S.A.	3,556	1,176	510
BNP Paribas Bank Polska S.A.	2,703	2,569	31
BNP Paribas S.A. Polish Branch	277	277	-
European Investment Bank	591	549	10



BNP Paribas Group Service Center S.A.

The business areas of BNP Paribas Group Service Centre S.A. consist of:

- providing IT services in the development of banking and financial applications and systems and IT support for entities from the BNP Paribas Group,
- providing electronic equipment rental services for retail Customers,
- comprehensive management of loyalty programmes for entities related to the Bank and for the Bank's Customers,
- providing marketing services on behalf of the Bank for employees of the Bank's partners, Customers or the Bank's employees and other entities of the BNP Paribas Group,
- developing scoring models as well as their verification and monitoring on behalf of the BNP Paribas Group entities,
- providing financial intermediation services through the mamgo.pl platform, which makes available financial products from BNP Paribas Group companies focused on car financing for individual and corporate Customers,
- providing auxiliary services to insurance mediation activities, consisting of administering and executing group insurance contracts concluded by the Bank,
- providing agency services in the field of insurance services.

Table 9. Basic financial data of BNP Paribas Group Service Center S.A.

PLN thousand	31.12.2024	31.12.2023	change YoY	
			PLN thousand	%
Balance sheet total	71,504	67,853	3,651	5.4%
Long-term investments	50,527	44,813	5,714	12.8%
Equity, including:	56,854	52,732	4,122	7.8%
net financial result	4,123	7,452	(3,329)	(44.7%)

* data non audited

The YoY decrease in the result is due to non-recurring events recognised in the 2023 result and changes in the tax treatment in 2024. Excluding non-recurring events, the Company's result is approx. 3% better YoY.

Campus Leszno Spółka z o.o. in liquidation

In January 2024, the Extraordinary General Meeting of Shareholders of Campus Leszno Sp. z o.o. adopted a resolution to dissolve the company and open its liquidation. The company ceased its operational activities on 31 October 2023.

On 22 November 2024, the Extraordinary General Meeting of Shareholders of Campus Leszno Sp. z o.o. passed a resolution to complete the liquidation of the company.



Pillar POSITIVE

Pillar description

The Bank wishes to be a leader in sustainable finance by developing a portfolio of products and services for all business lines. The Bank's aim is their dynamic sales, leading to an increase in sustainable finance from 4.5% at the end of 2021 to 10.0% in 2025. The goal was achieved in 2023 and at the end of 2024 the share was 11.6%. The Bank is implementing the highest ESG risk management standards and constantly improving the ESG risk profile of its loan portfolio. Additionally, the Bank consistently measures and limits its carbon footprint by supporting Customers in their transition. The Bank also seeks to reduce resource usage and implement responsible purchasing practices. By 2025, the Bank plans to reduce CO₂ emissions from its operations by 55% (vs. 2019) and paper usage by 80% (vs. 2019).

In relationships with Customers, the key factors are responsibility, availability, transparency and ethics. The overriding aim is to make Customers buy consciously what they need and not to be surprised by hidden clauses in contracts. Our Customer Centers will continue to be modernised to cater to the special needs of older people and people with disabilities. We assume that by 2025, 50% of the network will be certified as a 'Barrier-free facility'. The Bank does not plan to introduce solutions that would force Customers to give up their visits to the outlets. Instead, it will actively support Customers in their digital transformation.

The Bank will continue its commitment to local communities through the development of employee volunteering or further support of the initiatives of the BNP Paribas Foundation. The Bank is initiating public debate, providing educational activities, and establishing sectoral and cross-sector partnerships, thus building a brand that is closely associated with caring for the environment and issues important to society.

Strategic commitments and their implementation

Indicator	Strategic objectives 2025	Implementation 2024
Share of sustainable financing [vs. 2021: 4.5%]	10%	11.6%
Share of sustainable assets under management [vs. 2021: 5%]	30%	27.3%
Social commitment of employees (annual average per employee)	4h	2h 3 min
Customer Centres with the "Barrier-Free Facility" certificate (excluding partner establishments) [vs. 2021: 18%]	50%	41%
Reduction in CO ₂ emissions from operations [vs. 2019]	55%	59%
Reduction in paper consumption (based on paper purchase rate, in tonnes) [vs. 2019: 439.3t]	-80%	-58% (184.1 t)

Sustainable financing

The Bank is committed to offering responsible and sustainable products that have a positive impact on the environment. The Bank wants to contribute to the energy transition and the dissemination of solutions that foster environmental protection. With its offerings, the Bank wants to support entrepreneurship development and social innovation. The Bank ensures that products are accessible to people from groups at risk of exclusion. In 2024, the Bank focused on further developing sustainable products, conducting training for Customer Advisors and an information campaign for Customers to promote sustainable financing entitled "We look at business more broadly".

Value of sustainable financing (sustainable loans and advances) as at 31 December 2024 was 10.2 billion, representing 11.6% of the total gross portfolio measured at amortised cost (the total gross portfolio measured at amortised cost was presented in Note 21 of the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024).

Table 10. Value of sustainable financing provided by the Bank

PLN million	2024	2023	change (%)
with a positive environmental impact	6,353	6,553	(3.1%)
with a positive social impact	471	565	(16.6%)
ESG Rating-Linked Loan	468	340	37.6%
Sustainability-Linked Loan	2,866	2,141	33.9%
Total	10,158	9,599	5.8%

Table 11. Value of funding with positive environmental impact

PLN million	2024	2023	change (%)
renewable energy	1,500	1,870	(19.8%)
green building	2,727	2,441	11.7%
thermo-modernisation of buildings	1,220	1,322	(7.7%)
improving the energy efficiency of production processes	151	130	16.2%
low-carbon transport	108	225	(52.0%)
closed loop economy	212	251	(15.5%)
waste and water treatment	237	95	149.5%
natural resources and biodiversity	198	219	(9.6%)
Total	6,353	6,553	(3.1%)



Financing with a positive environmental impact applies to, among others, the following projects:

- green building – these include energy-efficient commercial¹ and individual construction;
- thermo-modernisation of buildings, which concerns primarily energy efficiency improvements in single- and multi-family residential buildings and modernisation of industrial buildings;
- improvement of energy efficiency of production processes, which comprises, among others, replacement of machine parks and process lines and modernisation of district heating networks;
- low-emission transport, including energy-efficient public transport, rail transport, production of sub-assemblies, parts and equipment for green transport, electric vehicles and charging stations;
- circular economy – projects focus on, among others, utilisation of circular materials, product design to reduce consumption of materials to ensure durability, modularity to facilitate repair and recycling, extension of life cycles of products or specialised vehicles and infrastructure for separate collection, recyclable materials and bio-waste;
- related to natural resources and biodiversity, sustainable agriculture, livestock breeding and sustainable forest management. It is also, for instance, protection of the coastal, marine and watershed environment, along with preservation and restoration of natural landscapes.

Table 12. Value of funding with positive social impact

PLN million	2024	2023	change (%)
tackling social exclusion	4	2	100.0%
health protection	349	416	(16.1%)
education	75	121	(38.0%)
basic infrastructure (e.g. water supply, sewerage)	43	26	65.4%
Total	471	565	(16.6%)

With regard to financing with a positive social impact, we consider projects which, among others:

- counteract social exclusion - meeting the objectives of creating jobs for vulnerable groups, schemes to prevent and/or relieve unemployment resulting from socio-economic crises and schemes to support entrepreneurship;
- concern health care, such as manufacture of and trade in medical and orthopaedic equipment to support mobility of people with disabilities and activities of public hospitals;

¹ Historically, BREAM (at outstanding / excellent level) and LEED (gold / platinum) certifications have been the qualification criterion; as of 2023, the basis for qualification is a primary energy demand index that is at least 10% less than the threshold set for near-zero energy building requirements.

- cover activities of public education institutions and other entities involved in the field of education and providing equal opportunities at an affordable price.

The Bank is offering Customers more favourable prices for sustainable products from 2020. To this end, the Bank has introduced the following for retail Customer segment a formal catalogue of products and investment types with a positive impact (environmental or social) benefiting from preferential pricing, allowing for a significant strengthening of the competitiveness of the offer. In particular, the Bank considers the following business areas as sustainable:

- development of renewable energy,
- improving energy efficiency,
- climate change mitigation and adaptation,
- low-emission transport,
- protection of water resources,
- closed loop economy,
- protecting biodiversity and natural capital,
- improving the quality and accessibility of public education and medical services,
- tackling social exclusion.

The qualification of a loan as fitting into the internal sustainable financing methodology is reviewed by the ESG Competence Unit on a case-by-case basis and approved by the credit decision-makers.

Financing linked to Sustainable Development

Sustainability-Linked Loan (SLL)

A Sustainability-Linked Loan (SLL) is a general purpose financing in which the loan margin is partly linked to the achievement of the company's defined ESG objectives. Sustainability-Linked financings are provided according to the LMA Sustainability-Linked Loan Principles guidelines. According to the guidelines, the indicators developed should address relevant areas of the company's impact on the environment, be verifiable and comparable. These may include the reduction of emissions of greenhouse gases or other pollutants, the certification of raw materials, the reduction of social inequalities in the workplace such as equal access to managerial positions for both genders or the gender pay gap indicator.



Examples of realisations in 2024:

- **A syndicated loan to the CCC Group** for a total amount of PLN 1.8 billion (including the Bank's share of PLN 300 million) to refinance existing debt, finance operations and develop the retail network. This is the first SLL financing for a fashion company in Poland.
- **Financing of the Grenevia Group** in a consortium of Banks for a total amount of PLN 700 million in Tranche A (including the Bank's share of PLN 230 million and the function of Sustainability Coordinator). The funds raised can be used to finance investments implemented in line with the company's business transformation strategy.

ESG Rating-Linked Loan

An ESG Rating-Linked Loan is a general purpose or investment loan in which the margin amount is partially linked to the improvement of the borrower's ESG rating score. This solution is designed for Customers who want to develop and improve the quality of sustainability management and reporting of ESG indicators in the company. In order to promote the concept and functionality of ESG ratings to Customers, the Bank has partnered with EcoVadis, a global ESG rating agency.

Examples of realisations in 2024:

- PLN 30 million for a leading IT services company,
- PLN 24 million for a producer of components for the automotive industry,
- PLN 5 million for a producer of relays for industrial automation and other applications.

ESG-Linked Factoring

ESG-Linked Factoring is sustainable factoring in which commercial terms are partly linked to improvements in a company's ESG indicators or ESG rating score.

In 2024, BNP Paribas Factoring Sp. z o.o., in cooperation with the Bank, signed an agreement with a leader in the wholesale and retail grocery trade for PLN 100 million.

Green Loan

Green Loans are loans whose funds are used for investments that have a positive or significantly reduced negative environmental impact. A Green Loan can combine several environmental objectives, such as an energy efficiency project, RES installations or the construction of an environmentally certified building. Financed investments can additionally be described in a Green Loan Framework based on the LMA Green Loan Principles and validated by a Second Party Opinion).

The Bank is an active player in the commercial property financing market, supporting projects in various segments. When selecting projects, we pay great attention to all environmental and social aspects, seeking to focus on those transactions that have a significant positive impact on the environment

Examples of realisations in 2024:

- A EUR 38 million syndicated loan (Bank's share EUR 19 million) to refinance the construction costs of the **Lakeside office building in Warsaw**. The building will meet the technical criterion of the EU Green Taxonomy, thanks to its high energy efficiency, and will also receive a BREEAM certificate of 'Outstanding'.
- A loan to developer Tonsa Commercial REI N.V. Group as part of a consortium of nearly EUR 83 million (the Bank's share EUR 20.6 million) for the **Olivia Star project in Gdansk**, one of the most modern green office buildings in Poland. The building was awarded BREEAM 'Excellent' certification and a maximum rating of 25 in the WELL Health-Safety Rating.
- Financing of EUR 29.5 million to Accolade for the development of the modern industrial park **Panattoni Park Szczecin VI**. The investment is being developed in accordance with BREEAM certification standards and is expected to achieve the 'Outstanding' level.
- A loan of more than EUR 51 million to the Stena Group for the acquisition of the **Studio B** office building in Warsaw. The building has received LEED certification at the highest Platinum level and meets the technical criteria of the EU Green Taxonomy.

Investment in renewable energy sources

We finance projects that involve renewable energy sources (RES). These include wind power plants, agricultural biogas plants, small hydroelectric plants and photovoltaic installations.

Supporting Customers in sustainable transformation

The Bank's key commitment to environmental responsibility is to support Customers in their energy transition. The Bank is continually developing its range of products and services to help Customers make the transition to a low-carbon economy and develop their sustainable and green investments.

Technical Expertise Team on Energy Transformation

The Bank has a team of engineers who provide expertise to the Bank's Customers and prospects in the field of energy transition investments, including those relating to the change to a sustainable business model. The experts' tasks include the development of analytical methods and tools to support decision-making processes regarding the financing of energy transition investments, the preparation of a substantive opinion on planned investments.

Sustainable Finance Team

The Bank also has a team of ESG and sustainable finance experts to support the business lines in structuring the ESG component for Sustainability-Linked Loan and ESG Rating-Linked Loan transactions. Experts in the popularisation of loans under this formula and coordinated loan transactions are in strategic dialogue with corporate Customers on sustainable business transformation, regulatory requirements and ESG challenges in supply chains. In 2024, the Bank continued its collaboration with EcoVadis, an agency specialising in ESG rating.



ELENA (European Local Energy Assistance)

In 2024, the Bank continued its cooperation with the European Investment Bank (EIB) on ELENA Programmes supporting energy efficiency improvements for:

- housing communities in multi-family buildings - ELENA EEFRRB. More than 850 housing communities were covered by the support programme, which carried out an investment in energy efficiency improvements amounting to more than PLN 240 million. All the programme's objectives were achieved.
- SMEs (small and medium-sized companies) and MidCAPs (mid-cap companies - i.e. companies with more than 250 employees and less than 3,000 employees) - ELENA EEFRCB.

Beneficiaries of the programme receive a subsidy of 90% of the cost of preparing technical documentation, which may include: a preliminary simplified technical assessment report (a document that the Bank offers as the only bank on the Polish market) and/or an energy audit in basic or extended version.

PF4EE (Private Finance for Energy Efficiency)

The PF4EE Programme consists of the reinsurance of the Bank's portfolio of loans granted to finance energy efficiency improvements. The beneficiaries of the PF4EE Programme are housing communities and retail Customers who finance thermal modernisation projects and RES micro-installations. Thanks to EIB support, the Bank's Customers were able to benefit from higher maximum loan amounts, extended financing periods and lower interest rates.

In Q2 2024, the Bank realised the entire limit available under the agreement with the European Investment Bank (EIB) and thus ended the offering of loans under the PF4EE facility.

During the four years of cooperation with the EIB under the PF4EE programme, the Bank has facilitated investments totalling PLN 1.45 billion by granting nearly 37 thousand loans to individuals and housing communities totalling PLN 1.25 billion.

InvestEU guarantees from the European Investment Fund (EIF)

In October 2024, the Bank signed an InvestEU portfolio guarantee agreement worth up to EUR 105 million with the European Investment Fund (EIF) to increase financing for startup and scaleup, small and medium-sized enterprises, small mid-caps and housing communities in Poland. Based on the guarantee, the Bank will offer more than EUR 160 million (equivalent to more than PLN 700 million) of new debt financing to support sustainable investment projects of SMEs, housing communities and innovative companies.

The agreement is the largest guarantee issued in Poland by the EIF since the fund began operating in the country in 1994. It is also the first unlimited guarantee issued by the EIF to a commercial Bank in Poland with the support of InvestEU, the EU's scheme for financing sustainable private and public investments.

Products with the InvestEU EFI guarantee will be offered to Customers in 2025.

Loan with a grant from the Clean Air priority programme

The Clean Air Programme is Poland's largest and most important project to effectively improve air quality and reduce greenhouse gas emissions. Funding for the replacement of heat sources and thermo-modernisation is provided for owners and co-owners of single-family houses. The Clean Air loans are covered by a free guarantee from Bank Gospodarstwa Krajowego, allowing Customers to benefit from higher maximum loan amounts, extended financing periods and lower interest rates. The programme was discontinued by the National Fund for Environmental Protection and Water Management in November 2024.

Loans granted in cooperation with Bank Gospodarstwa Krajowego for the implementation of a green investment leading to a minimum 30% reduction in primary energy consumption:

- **Green Credit** - within the framework of the FENG Operational Programme (European Funds for a Modern Economy 2021-2027, Priority 3 Greening of Enterprises, Measure 3.01 Green Credit). The product is aimed at SME, Small Mid-Cap and Mid-Cap companies. The correct implementation of the project gives the entrepreneur the opportunity to obtain an environmental bonus from BGK for partial repayment of the loan up to 80% of the eligible costs. In 2024, there were two editions of the Green Credit call for applications.
- **Ekomax loan** - the product is aimed at companies in the SME sector. The loans are covered by a free guarantee from BGK and entitle the borrower to a subsidy of 20% of the loan used, once the investment has been implemented.

Cooperation with Envirly

In line with its strategy, the Bank is consistently strengthening its position as one of the leaders in the provision of ESG-related services and green transformation financing. In 2024, the Bank extended its long-term partnership with Envirly by making the platform also available to micro-entrepreneurs for environmental impact measurement in Scopes 1 and 2 free of charge. As part of the planned long-term cooperation, the Bank is also offering attractive pricing terms to other business Customers - small and medium-sized enterprises and corporates. Through the initiative, the Bank enables Customers to report in accordance with international standards and norms, such as GHG Protocol and ISO 14064-1.

The certified Envirly tool not only enables the calculation of an organisation's carbon footprint, but is also a module for calculating a product's carbon footprint, a module for ESG reporting and a CBAM (*Carbon Border Adjustment Mechanism*) calculation tool.

Business Breakfasts

In 2024, the Bank continued its series of 'Business Breakfast' meetings with entrepreneurs, to which we invited both Customers and prospects of the Bank. The events were held in 15 locations across the country. The Bank's experts discussed a number of important issues related to energy transition, support for Polish companies in this process, EU funds and ways of energy efficiency.



Educational activities in support of Business Advisers

In order to guarantee the best service in the area of sustainable financial products, in 2024 the Bank:

- delivered training and consultation sessions to Advisors serving Business Customers,
- together with the Warsaw Banking Institute, an organisation specialising in financial education, continued the Level I certification "Professional Business Advisor to Companies with Basic ESG Knowledge" and started the certification "Professional Business Advisor to Companies - Level II".
As part of the aforementioned training, more than 400 Business Banking Advisors expanded their knowledge on topics such as sustainable financing and available European programmes to support business development.
- held the first edition of the ESG Development Academy for Business Advisers, which 60 advisers completed.

Activities to support Customers in the Food & Agro sector

BNP Paribas Group has extensive international experience in servicing the Food & Agro sector, including as the European leader in agricultural machinery leasing financing. Also in Poland, we are a leader in financing this sector. We work to popularise a responsible approach to food production and help implement the right tools for this.

AgroEmisja – greenhouse gas calculator

AgroEmisja allows a precise assessment of the emissivity of agricultural production. The first and only solution of its kind available in Polish and will be successively extended with new calculation models from 2021. Users can make calculations for crop production, dairy production, as well as chicken and turkey broilers, pigs and beef cattle, and the water footprint for crops. This enables farmers to better understand their environmental impact, but also sets new standards for the industry as a whole.

The Agronomist.pl platform

The Agronomist.pl platform is an innovative way of building relationships and sharing knowledge. It is aimed at agricultural producers, processors and food manufacturers who understand the need to change their business model and want to grow in line with market trends, including, above all, sustainable production standards. The content of the Agronomist platform covers the entire Food & Agro value chain with a particular focus on local communities.

In 2024, the platform's content section has been enriched with new publications of material related to environmental and social impact reporting in accordance with the CSRD for the food production value chain, as well as the Puls Agro series, videos of experts on the current situation in the fields in different regions of Poland.

In 2024, more than 117,000 users visited the platform.

Food & Agro sector partnerships

The Bank participated in the development of legislation at the national level on sustainable development and energy transition through the Renewable Energy Council of the Lewiatan Confederation and the working groups set up by the

Ministry of Climate and Environment as part of the Implementation of Industry Agreements. At the same time, the Bank continued its cooperation with the Polish Sustainable Agriculture and Food Association and its member companies.

Products with positive social impact for Customers in the Retail and Business Banking segment

The Self-Management Account

Since 2020 the Bank has an offer aimed at parents, the Selfie Account, and is running a series of educational campaigns as part of its Mission Education project, which supports teachers and parents in building financial awareness among the youngest.

At the end of 2024, the Bank was operating more than 78,000 Samodzielniak Accounts - designed for under-18s using the offer under the care of their parents or guardians.

Offer for Ukrainian citizens

For Ukrainian citizens living in Poland, the Bank offers facilities that facilitate the use of banking products. At the Bank, Ukrainian citizens can easily open an Account Open for You or an Account for Now directed to refugees. The account offers are designed for Customers who appreciate transparent and simple banking solutions.

For this group of Customers, the Bank also has a website and prepares advertising materials in Ukrainian. Customers can also select the Ukrainian language when they call the Bank's helpline.

Additionally, in 2024, for Customers from Ukraine, the Bank:

- has made the Priceless Moments (Bezcenne Chwile) programme available in a Ukrainian-language version,
- prepared new BTL materials in the Ukrainian version (credit offer, Visa tennis, 8% deposit account, Cardif insurance),
- conducted a number of sales campaigns (Priceless Moments, Samodzielniak Account) and activation campaigns (GOmobile).

In 2024, 33 thousand personal accounts were opened with the Bank for Ukrainian citizens, bringing the total to 235 thousand.

Non-Profit Business Open Account

The Bank offers an account for non-profit activities, i.e. such social or professional organisations whose basic services are free of charge. The following can take advantage of this offer: housing communities, cooperatives, foundations, associations.

Under a single agreement with the Bank, an organisation can receive:

- current settlement account in PLN,
- investment account,



- term deposit accounts,
- access to mobile and online banking systems,
- comprehensive support by a Banking Advisor,
- preferential terms for additional services,

The number of Non-Profit Accounts (Non-Profit Package) in 2024 was 36 thousand (2023 – 34.1 thousand).

Offer for social economy enterprises

The Bank also has an offer for social economy enterprises. In this way, we support entities that make a profit but at the same time pursue social and environmental objectives and reinvest the profit in the pursuit of their social mission.

Investing based on ESG criteria

The Brokerage provides Customers with sub-funds segregated within investment funds managed by BNP Paribas TFI S.A. At the end of 2024, there were 9 sub-funds on offer that include ESG factors according to the SFDR classification (Article 8 or Article 9).

The Brokerage also offers the sale of units of funds run by various TFIs. Among these are 261 funds designated as balanced (Article 8 and Article 9 of the SFDR).

Customers receiving investment advice on exchange-traded financial instruments and investment funds are offered portfolios containing a minimum of 20% of instruments rated as balanced. This applies to local and foreign currency portfolios with different risk profiles. The Brokerage's procedures use an assessment of instruments (shares, bonds, ETFs) based on the BNP Paribas Group methodology.

For listed instruments, namely equities, bonds and ETFs, issuers and instruments that do not meet the BNP Group's requirements are excluded from the investment spectrum, thus limiting exposure to ESG 'sensitive' sectors. These include manufacturers of controversial unconventional weapons, companies in the pornography industry, tobacco, entities producing asbestos fibres, selected chemicals or trading in endangered animal and plant species.

Investment products in support of social and environmental objectives

The Brokerage offers structured products, part of the proceeds of which are earmarked for social or environmental causes (e.g. support for humanitarian aid campaigns for the people of Ukraine). The companies whose shares are the underlying asset for these products are analysed in detail in terms of environmental, social and corporate governance factors. Selected structured certificates in the Brokerage's offering are issued under the Green Bonds Principles standard, which means that the net proceeds of the issue will be reallocated in whole or in part into Qualifying Green Assets. These assets can include various forms of financing in selected categories such as renewable energy, energy efficiency or water management, among others.

ESG sub-funds

BNP Paribas TFI S.A., as a financial market participant, with the launch of the ESG sub-funds, in compliance with EU regulations, has implemented a number of measures to disclose information to end-investors on the introduction of sustainability risks into the business. In particular, this is the consideration of adverse sustainability impacts as well as the topic of sustainable investment objectives (Article 8 SFDR) in the investment decision-making process. As of 30 December 2022, the aforementioned disclosures have been expanded with new guidance in line with the regulatory technical standards so that end investors can make informed decisions based on reliable data.

Available ESG sub-funds offered by BNP Paribas TFI S.A.:

- BNP Paribas European Convertible Bonds,
- BNP Paribas Global Universal Bond,
- BNP Paribas US Growth Shares,
- BNP Paribas Asian Tigers Shares,
- BNP Paribas World Shares,
- BNP Paribas AQUA Shares,
- BNP Paribas Global Equities,
- BNP Paribas Global Stable Growth,
- BNPP Globalny Global Stable Growth.

A detailed description of all ESG products can be found on the website of BNP Paribas TFI S.A. ([ESG - BNP Paribas TFI S.A.](#)).

Basic data on ESG investments and risks are included in the funds' prospectuses, where all aspects linking to the investment are described in detail, including the specifics of ESG.

Personal Finance – a sustainable offer for retail Customers

Offer	Implementation in 2024
Installment loan to finance green energy sources	<ul style="list-style-type: none"> • financing of more than 4.6 thousand projects (mainly related to photovoltaics and heat pumps), with a total loan volume of over PLN 136 million • continued cooperation with market-leading RES companies with the offer of instalment loans dedicated to the energy transition
Credit for Green Change	<ul style="list-style-type: none"> • 4.4 thousand loans with a total value of over PLN 220 million
Green Mortgage	<ul style="list-style-type: none"> • 376 mortgage loans with a total value of over PLN 171 million



Offer	Implementation in 2024
	<ul style="list-style-type: none"> attractive loan conditions - the entitlement document is the energy performance certificate for the property, where the non-renewable primary energy demand indicator does not exceed 58 kWh/(m²*year)
Long-term rental of equipment financed by an instalment loan	<ul style="list-style-type: none"> long-term rental offer in cooperation with the BNP Paribas Group Service Centre subsidiary and leading players on the consumer electronics market, i.e. Media Markt, iSpot, extended from 2024 bike rental in cooperation with Kross nearly 500 machines and bicycles were rented
Financing of low-emission vehicles	<ul style="list-style-type: none"> redefinition of the designation of car loans as green and from 2024 includes only those financing PHEV, electric and hydrogen drives financing, in cooperation with dealers and commissions, of 220 low-emission vehicles for an amount of ~PLN 23 million promoting the My Electrics programme by offering leasing products and assisting Customers in obtaining subsidies for a low-emission vehicle

Measures to promote a circular economy and extend the life of products

- the Bank, through its retail partners, is making it possible to take advantage of electronics rental in a new sales channel - in selected online shops, including iSpot.
- the Bank has partnered with fintech Plenti, which specialises in equipment rental offers. Until now, this company has offered a rental period of between one month and one year to users of its platform. Thanks to the involvement of the Bank and BNP Paribas Group Service Centre, users of the Plenti platform can now use their electronics for two years, without having to purchase them. Renting for two years reduces the cost of the service compared to an offer for a shorter period, and the longer use of the equipment also means less electronic waste and environmental burden.

mamGO Mobility Platform

mamGO is a marketplace built for collaboration between the Group and car dealers. On the platform, one can find offers from dealers and suppliers from all over Poland, and the Bank provides financing for the purchase with a loan, leasing or rental. The platform is a result of cooperation between the Bank and BNP Paribas Group companies operating in Poland: leasing company BNP Paribas Leasing Solutions, BNP Paribas Group Service Center, which is responsible for the creation and technological development of the platform, and Arval, which specialises in car rental.

In addition to the car offers, the website includes an information and education section, through which the user can broaden their knowledge of electric cars.

As part of mamGO Bank:

- promotes zero-emission vehicles by giving Customers the opportunity to select them easily and encouraging them to consider purchasing an electric vehicle,
- educates Customers on the advantages of electric cars through articles on electromobility,
- provides information on available grant and subsidy programmes, e.g. under the My Electrician programme.

The Polish Alternative Fuels Association has become a content partner of the mamGO blog.

Positive banking

Customer relations

The foundation of the Bank's business is to build lasting relationships with its Customers based on transparency, honesty, simplicity and sensitivity. The Bank wants to know what Customers' current needs are, so it listens to the voice of the Customer and, based on this, takes various measures to be a trusted business partner for them. For more information on Customer relations, see Consumers and end-users (ESRS S4).

Availability

The Bank is creating an ecosystem of solutions that provide every Customer with equal access to banking and the utmost comfort and simplicity in their use. The Bank operates in line with the GO beyond strategy for 2022-2025, in which accessibility is one of the key commitments in the POSITIVE pillar. The Bank places particular emphasis on facilitating the use of banking services by people from groups at risk of social exclusion. People with disabilities or seniors can count on finding products and services tailored to their needs at the Bank, both stationary and online. The Bank continually analyses all channels of access to its offering for functionality and friendliness in accordance with the best WCAG (Web Content Accessibility Guidelines) guidelines.

The Bank adapts its Customer Centres architecturally to the needs of persons with reduced mobility. The Bank's efforts are confirmed by the Integration Foundation, which awards the "Barrier Free Facility" certificate to facilities that have implemented facilities for people in wheelchairs, with mobility impairments, who are blind, partially sighted or deaf, and are adapted to the needs of the elderly and people with young children.

Key ACHIEVEMENTS in 2024:

- 143 Customer Centres and the Bank's Head Office building in Warsaw with the 'Barrier-Free Facility' certificate,
- 195 Customer Centres with induction loops,
- 545 sign language interpreter calls - call time 31 hours.

We describe our accessibility initiatives in more detail in the Consumers and end-users section (ESRS S4).



Simple language

The Bank is also simplifying communication with Customers. In 2024, an advanced, multi-stage training course for 22 plain language consultants was conducted at the Bank, ending with an exam. The consultants' knowledge is regularly updated and supplemented during regular, practical workshops and lectures led by an expert. Currently, 80 people have received advanced training in the principles of plain language. They are now plain language consultants who simplify messages, text messages, marketing texts and other materials addressed to Customers on a daily basis.

The Bank also offers employees training on the basic principles of plain language on an e-learning platform, which was attended by more than 400 people in 2024, as well as training in traditional form, which was attended by 101 people in 2024. In 2024, a conference for Bank employees entitled 'Simple Language Day' was organised for the second time. A total of 320 employees took part in a series of lectures and talks on various aspects of simple communication with Customers.

In April 2024, the Bank was awarded a certificate of simple Polish language by the Straight Polish Language Workshop of the University of Wrocław.

Addressing social and environmental themes in communication

#INFLUENCERS and the Good Decisions Bank

On 2024 International Earth Day saw the launch of the #INFLUENCERS campaign in care of our rivers - whereby the people of Poland are encouraged to create a grassroots system to collect information on water cleanliness. In addition, in May, the Bank launched a bonus sale called 'Account with a card for Influentials': every person who enters the promotion when opening an Account Open to You with one of three Mastercard debit cards of their choice and e-banking, receives an innovative Aguard float that allows them to check the quality (salinity) of the water in the dedicated Aguard app on their phone.

Mission Education

The Bank continues its interdisciplinary banking project Mission Education, which spreads knowledge in the community on the topics of finance, cyber-security, ecology, entrepreneurship and psychology, with Bank employees having the opportunity to conduct classes in educational institutions or for senior citizens. As part of the social campaign, in H2 2024, the new Pocket Mission is joined by the new Saving Mission, which fills a gap in the education system by providing children, parents and teachers with valuable and engaging financial education content in the form of practical expert advice, podcasts, developmental games, lesson plans. The project is dedicated to educators of children in primary school grades I-VI and parents.

During the 2021-2024 campaign, 17,720 pupils from local kindergartens, primary and secondary schools participated in financial education lessons delivered by our staff and 2,373 teachers were involved.

Campaign for the SME and Corporate segment of BNP Paribas presenting the stories of Customers' business transformations

At the beginning of June 2024, the Polish edition of the group campaign "For those who move the world" was launched, targeting the area of SMEs and Corporates. The campaign also included Polish companies, which, by establishing cooperation with the Bank, gained access to financing and comprehensive support in taking key decisions - financial, technological and business, e.g. in the areas of energy transformation, energy efficiency, international expansion and product innovation. The aim of the campaign was to show how the BNP Paribas Group's partners are tackling the challenges of sustainable transformation and how they are developing and benefiting from the experience of the largest banking group in the European Union.

Community involvement

The Bank has had a systemic commitment to local communities for years. In line with the POSITIVE pillar of GO beyond's 2022-2025 strategy, the Bank aims to have a positive impact on the social and environmental environment, among other things. The Bank wants to be an agent of positive change and a good neighbour open to local needs. The Bank focuses on tackling social exclusion, supporting diversity and financial education. The Bank's impact on society is reinforced by the BNP Paribas Foundation.

BNP Paribas Foundation

Since 2006, the BNP Paribas Foundation has been running proprietary and partnership scholarship programmes, is active in the area of environmental philanthropy, coordinates the Bank's employee volunteering and cooperates with social organisations, supporting them in a substantive and financial way. The BNP Paribas Foundation Council is chaired by the President of the Bank's Management Board and its members are representatives of the areas of the Bank and Group companies most important for the Foundation's activities.

The Foundation's mission is "to boldly change the world to one where there is less inequality and where we can be at peace with the future of our planet".

BNP Paribas Foundation activities:

- promoting social commitment - employee volunteering and individual philanthropy by Bank employees
- development of tools to support community involvement, e.g. salary deduction scheme, volunteering platform,
- strengthening cooperation with NGOs and experts working in the fields of social exclusion, climate change and promoting diversity
- education programmes - equalising educational opportunities and inspiring children and young people through scholarships and development activities,
- environmental philanthropy programmes - protecting ecosystems and implementing our own activities with care for the environment.



Activities of the BNP Paribas Foundation

Initiatives involving employees	<ul style="list-style-type: none"> • Employee volunteering programme • Individual philanthropy programme I support all year round • Competition for Voluntary Projects • The Szlachetna Paczka campaign • Blood donation campaign Blood cell • Action Good kilometres • Action Two Hours for Earth • Bankers for Youth Financial Education BAKCYL programme • Bank's Local Ambassador Programme Local Grant Programme
Initiatives targeting external stakeholders	<ul style="list-style-type: none"> • Scholarship and development programme Class • Dream Up education programme • Programme of Encounters with Music with the National Philharmonic Orchestra • Peaceful House Project with the OFFschool Foundation • My Future Scholarship Programme with Our Home Society
Actions for refugees	<ul style="list-style-type: none"> • Knowledge to Power tutor and scholarship programme with the Ocalenie Foundation • Charitable donation to the Ocalenie Foundation • Support for victims of the armed conflict in Ukraine • Grassroots volunteering initiatives
Environmental philanthropy	<ul style="list-style-type: none"> • Re:Generation programme with UNEP/GRID - Warsaw • Evergreen Forests and Microreserves with the Natural Heritage Foundation • Community Organisations for Climate initiative with the Donors Forum

Programmes and partnerships

Employee volunteering

The Foundation has been running an employee volunteering programme under the motto 'You can rely on me' at the Bank since 2011. With the support of the BNP Paribas Foundation, employees can tailor the form of involvement to their needs and capabilities. The Bank and the Foundation support the implementation of their own initiatives, team volunteering and participation in social actions coordinated by the Foundation in cooperation with NGOs. The Foundation runs a special volunteering platform that enables the organisation of new and joining existing volunteer actions. Each person employed at the Bank had 16 fully paid hours available for volunteering per year. From January 2025, the number of these hours increases to 24. At the same time, employees' social activities are part of the BNP Paribas Group's international #1MillionHours2Help initiative, coordinated in Poland by the BNP Paribas Foundation.

Individual philanthropy programme I support all year round

Operating since 2017, the 'Support all year round' programme is a simple tool for voluntary salary deductions. Regular contributions help NGOs plan their long-term activities. In 2024, people working at the Bank chose to support the Słonie na Balkonie Foundation and the Projekt Starsi Foundation. 408 people participated in the programme. In addition to the financial support, which totalled PLN 171,900, the Bank and the Foundation prepared educational webinars together with these organisations.

Competition for Voluntary Projects

The Volunteer Projects Competition has been a key element of the Bank's employee volunteering programme for 11 years. All people working in the Group can submit initiatives that address the most pressing needs of local communities. Winners receive up to PLN 5,000 to implement their ideas in cooperation with local community organisations. In addition, they can count on substantive support from the BNP Paribas Foundation.

Competition for Volunteer Projects in 2024:

- 52 completed projects,
- 244 employees involved,
- assistance to 4,732 people,
- 2,219 hours worked,
- over PLN 250,000 earmarked by the BNP Paribas Foundation for projects.

Szlachetna Paczka

Since 2018 the Bank has been a strategic partner of Szlachetna Paczka. During this time, the Bank has supported the programme with PLN 9 million. The BNP Paribas Foundation runs the largest organised employee volunteering campaign among companies for the beneficiaries of the Szlachetna Paczka. In 2024, as in previous years, we also made it possible for Customers to support the Szlachetna Paczka. On the Bank's website, we have included the possibility of making a quick donation directly to the organiser's account, i.e. the Wiosna Association. Thanks to the support of the Bank and Customers, in 2024 the Szlachetna Paczka received support of nearly PLN 2 million.

Szlachetna Paczka 2024:

- 137 people working in the Bank and Group companies were leaders of the Szlachetna Paczka,
- 157 needy families received parcels prepared by our volunteers,
- 2,740 volunteers from the Bank and Group companies,
- PLN 1,500 subsidy for each parcel from the BNP Paribas Foundation.



Dobre kilometry kilometres

Every year, the BNP Paribas Foundation organises the "Dobre kilometry" campaign, which allows employees to combine physical activity with social commitment. For a month, kilometres covered on a bike, in a run or during other distance sports are counted. The Foundation converts them into financial support, which goes to a social organisation selected by employees in a vote.

Good kilometres in 2024:

- 202,069 kilometres covered,
- PLN 70 thousand donated to the Słonie na Balkonie Foundation,
- 940 people involved.

Two hours for the Earth

In April 2024, the Bank joined the celebration of International Earth Day. On the grassroots initiative of employees with the support of the BNP Paribas Foundation, the Bank organised the Two Hours for Earth campaign. Our volunteers, together with their relatives and colleagues, dedicated this time to cleaning green areas together. In 2024, 100 employees from all over Poland participated in the action.

2,740

volunteers from the Group were involved in the Szlachetna Paczka

23,643

hours devoted to community initiatives

408

employees took part in the individual philanthropy programme "I support all year round"

3,600

hours worked in the local community by the Bank's Local Ambassadors

The Foundation's activities in the field of education

Scholarship and development programme Class

The Class is one of the longest-running scholarship programmes in Poland - it was initiated in 2003 by the Bank and has been run by the BNP Paribas Foundation since 2006. Its participants are development-oriented primary school graduates from smaller towns and from families with a weaker financial situation. The scholarship enables students to attend good general secondary schools in six academic cities in Poland. Participants receive full financial support during their high school education and a financial scholarship in their first year of university. They can also count on the support of the BNP Paribas Foundation in their volunteering activities and benefit from holiday and integration trips. Over the course of more than 20 years, more than PLN 30 million has been allocated to the Classroom programme.

In 2023, the programme underwent a major strategic review. A pilot of a new **MOGE** programme focused on strengthening social-emotional competences of young people was launched in 2024.

The scholarship and development programme Class is:

- support 897 graduates from 540 villages (since 2003),,
- 72 scholarships in the 2024/2025 school year.

Knowledge to Power tutor programme

Since 2016, together with the Ocalenie Foundation, the BNP Paribas Foundation has been helping children and young people with refugee and migration experience from Syria, Iraq, Ukraine and Chechnya, among others. In 2018 BNP Paribas Foundation launched the joint scholarship and tutoring programme Knowledge to Power, which helps them find their way in the Polish education system, as well as their social inclusion. Since 2019, the programme has been implemented as part of the BNP Paribas Group's European initiative for the integration of young refugees. From 2021 onwards, BNP Paribas Foundation is a strategic partner of the Ocalenie Foundation.

In 2024, additional activities were undertaken to raise public awareness of refugees and migration: an exhibition of works by programme participants entitled My Place on Earth and fundraising activities, i.e. a charity transfer involving Bank employees and Customers.

Knowledge to the power in 2024:

- 100 young people participating in the programme (from 2018 - 200 people, many have been in the programme for several years),
- 30 scholarships awarded - 22 academic and 8 aid,
- 115 committed volunteers.



In 2024, the programme was recognised and awarded in two competitions. The BNP Paribas Foundation was awarded the Benefactor of the Year in the Openness to Diversity category and the Diversity Charter Award in the Partnership category for the programme.

Dream Up

Dream Up is an international programme of the BNP Paribas Group, operating in 29 countries and initiated and funded by the BNP Paribas Fondation in Paris. Under the programme, the BNP Paribas Foundation in Poland, together with its partner, organise professional music classes for disadvantaged children and young people. Their aim is not only artistic education, but above all the shaping of social-emotional competences, building confidence in oneself and one's abilities, and discovering passions.

In 2024 BNP Paribas Foundation has partnered with:

- Wspólnota Dźwięków Foundation - as part of the concluding third edition (until June 2024) - activities for children and young people attending social institutions in Warsaw and Sejnach;
- Association 'Dla Ziemi' - as part of the new fourth edition (from September 2024) - activities for girls with refugee experience, who form the Girls' Drumming Group.

Dream Up in 2024:

- 47 people participating in the programme,
- 173 hours of music workshops,
- 2 concerts - concluding the third edition and starting the fourth edition,
- 7 musical pieces recorded for the album (fourth edition).

Rest Home for Young People

In September 2023 BNP Paribas Foundation became a strategic partner of the House of Peaceful Youth programme initiated by the OFF school Foundation. This is a programme in which secondary school students and as agents of change lead activities with their peers, based on scenarios prepared by expert individuals and organisations.

The programme developed scenarios in six thematic areas proposed by young people, including mental health, social and civic engagement effective finding one's way in the labour market or artificial intelligence. The project website has been visited by nearly 90 000 people and the lesson plans have been downloaded more than 43 thousand times.

In 2024, the nationwide Peaceful Home - Home on Tour was launched to explore the real needs of young people through dialogue involving them personally. The campaign was conducted in 12 towns and 21 secondary schools were visited.

Encounters with Music

Since 2003 BNP Paribas Foundation has cooperated with the National Philharmonic, and since 2011 has been a partner of the Encounters with Music concert series. These are peculiar 'music lessons' - i.e. mini-concerts accompanied by the words of the presenter, who discusses various issues related to music in a professional manner that engages the audience to actively participate. These concerts are held outside the Philharmonic's premises, in schools, kindergartens and community centres in smaller towns and cities in several provinces in Poland, in order to increase access to high culture where it is difficult.

Encounters with Music 2024:

- 2,429 educational concerts,
- approx. 475 thousand people attending concerts,
- 100 villages visited.

My future

My Future is a scholarship programme organised by Our Home Society and aimed at children and young people residing in family and institutional forms of foster care, as well as independent alumni. Participants can receive financial support to be used for the development of their needs and passions in the amount of up to PLN 4 thousand per child.

The BNP Paribas Foundation has supported the implementation of the programme since 2019 through its participation in the scholarship committee and the substantive assessment of applications. In 2024, the society received PLN 100 thousand grant from the Bank and PLN 20 thousand from the BNP Paribas Foundation. The Bank has been involved in providing assistance since 2008.

Bankers for Youth Financial Education BAKCYL

Bankers for Youth Financial Education BAKCYL is a sectoral educational programme managed by the Warsaw Banking Institute. As part of the initiative, volunteers - everyday employees of the programme's partner banks - pass on practical knowledge and skills on financial services to young people in schools. The Bank has been a partner in the initiative since 2013, with activities coordinated by the BNP Paribas Foundation.

More than 36 thousand participants have taken part in the BAKCYL programme since 2013.

The Foundation's environmental philanthropy activities

The BNP Paribas Foundation is committed to delivering programmes and initiatives in a sustainable and environmentally responsible manner. It works for the climate through the protection and restoration of key ecosystems and education. In 2024 BNP Paribas Foundation was a partner in three initiatives:



- **Re:Generation** (in partnership with the UNEP/GRID-Warsaw Centre) - restoration and protection of meadow ecosystems on the Bay of Puck. The measures covered an area of 7.5 ha.
- **Eternal Forests and Microreserves** (in partnership with the Natural Heritage Foundation) - as part of the 'Eternal Forests' project, we have protected 1 ha of forest in the Biebrza National Park buffer zone, which, by creating a 'carbon store' through living and dead trees, will retain and permanently store carbon taken out of the atmosphere, at a rate of approximately 150 tonnes of pure carbon per hectare of forest. In the "Microreserves" project, five protection zones have been created for endangered rare animal and plant species in Poland's most valuable natural areas.
- **Social Organisations for Climate** (in partnership with the Donors Forum in Poland) - a series of educational workshops, networking meetings and webinars for NGOs from across Poland on climate change. A "Declaration of Social Organisations for Climate" and an online knowledge base were also published. In 2024 30 new organisations have signed the Climate Declaration, bringing the total to 50 signatories.

Action for refugees

In 2024 the BNP Paribas Foundation continued its activities related to supporting people who were victims of the armed conflict in Ukraine. The Foundation provided new support to two organisations:

- Ukrainka Foundation in Poland - support for the implementation of Polish language courses for Ukrainian women,
- Ukraiński Dom Foundation - for the implementation of support and integration programmes for Ukrainian refugees.

The donation awarded to the Ocalenie Foundation in 2022 allowed it to carry out intervention and long-term activities targeting refugees at the Centre for Assistance to Foreigners in Lomza until June 2024.

Emergency response - flooding in Poland

In September 2024, many cities in Poland faced a difficult flood situation. In the first days of the floods, the BNP Paribas Foundation and the Bank donated PLN 600 thousand to the Polish Red Cross, the Śnieżnik Massif Local Fund, the TRATWA Association and the Krajowe Stowarzyszenie Sołtysów. BNP Paribas Group additionally donated EUR 50,000, which we gave to the Pod Psią Gwiazdą Foundation. We also launched a charity transfer that raised PLN 1 million. This is a great confidence of the Bank's Customers in our social activities, which is why we have given careful consideration to every request that has come to us.

We have donated the funds collected:

- PLN 500 thousand - for the Śnieżnik Massif Local Fund,
- PLN 300 thousand each - to the TRATWA Association - Centre for Disasters and Emergencies and the Polish Red Cross,
- PLN 100 thousand to the Wiosna Association,
- PLN 75 thousand each to flooded schools in Łomnica and Wleń,

- PLN 50 thousand each - to the flooded school in Ściegny, to the Mountain Spirit Local Partnership Fund and to the ArteWeda Association.

In an effort to help those affected by the flood, BNP Paribas Foundation has launched a volunteer trip to Stronie Śląskie.

Action for local communities

Local Bank Ambassador Programme

The Bank's Local Ambassadors are a community of more than 160 Bank employees. The Bank's employees have been active in their local communities since 2018 and support foundations, associations and schools from the bottom up. In 2024, they have worked 3,600 hours (39,600 since 2018).

Local Grant Programme

The Local Grants Programme, one of the Bank's most important social initiatives, allows us to support local communities and NGOs. Every year, the directors in the Customer Centres, in consultation with their teams and the Bank's Local Ambassadors, submit NGOs to the programme. We particularly support those activities that:

- minimise the social exclusion of children and young people from difficult backgrounds, the elderly and people with disabilities,
- are directed towards the support and integration of refugees,
- serve to protect the environment and create environmental awareness,
- strengthen the role of women and support their entrepreneurship.

During the 14 editions of the Local Grants Programme to date, the Bank has awarded more than 1 thousand grants worth more than PLN 3.5 million.

Local Grants Programme 2024:

- 66 funding for local community organisations,
- PLN 300 thousand earmarked for grants.

Donations and sponsorship activities

Donations

Donations made by the Bank support civic development and activity, enhance the quality of life of local communities and strengthen the social commitment of employees, and promote responsibility in the field of health and environmental protection. When deciding to make a donation to an NGO or institution, we want to increase the effectiveness of the implementation of its socially useful activities.

**Table 13. Financial donations to NGOs made by the Bank in 2024**

Category	Amount (PLN thousand)
BNP Paribas Foundation	3,700
Beneficiaries of the Local Grant Programme	300
Organisations promoting social inclusion and diversity	1 079
Organisations supporting education and culture	1 159
Trade unions	50
Strategic partnership with the Szlachetna Paczka	670
Organisations promoting environmental protection	574
Total	7 532

Sponsoring

Our sponsorship policy is designed to build the brand and strengthen brand awareness. Through the sponsorship policy, we create a positive image of the Bank. The direction of sponsorship activities is determined by the BNP Paribas Group's global sponsorship strategy. As part of this strategy, we promote culture - especially cinema and tennis. We sponsor tennis events in Poland, film festivals, cultural, economic and technological events.

Table 14. Expenditure on sponsorship activities in 2024

Category	Amount (PLN thousand)
Film events	4,781
Tennis events	1,147
Other sponsorship activities	642
Total	6,570

Film events

Cinematography is one of the most important pillars of BNP Paribas Group's sponsorship strategy. The Bank is implementing this strategy under the slogan #WeLoveCinema.

In 2024, the Bank participated in a number of film events, including:

- Mastercard OFF Camera International Festival of Independent Cinema - Central Europe's largest festival of independent cinema. The Bank was a strategic partner of the event for the sixth time, and in 2024 also partner of the Audience Award and, together with Mastercard, the Female Voice Award.
- BNP Paribas Kino Letnie Sopot-Zakopane - the longest holiday and free film festival in Poland.
- BNP Paribas Green Film Festival - an international environmental film festival. The Bank has become the title sponsor of the 7th edition of this festival.
- BNP Paribas Two Edges - Film and Art Festival - a festival for connoisseurs of cinema and other arts. For the fourth consecutive year, the Bank was the titular partner of the festival.
- BNP Paribas Warsaw SerialCon - the first serials festival in Poland. The Bank became the titular partner.
- UKRAINE! 9th Film Festival - the Bank as a partner of the event was promoted in Warsaw during the main series and in 14 Polish cities.

In 2024, the Bank continued the 'We Love Cinema' project at the Bank's headquarters. Once a month, a screening is organised for Bank employees in the auditorium. The repertoire includes films from festivals sponsored by the Bank.

Tennis events

The Bank is part of the BNP Paribas Group, the largest sponsor of tennis in the world. Tennis, alongside cinema, is the second most important pillar of the BNP Paribas Group's sponsorship strategy. The Bank implements this strategy under the slogan #WeAreTennis.

In 2024, the Bank participated in a number of tennis events, including:

- We Are Tennis Cup - Group employee qualifiers for the 8th international tournament for BNP Paribas Group employees. The finals of the tournament took place at the Roland Garros courts in Paris,
- BNP Paribas Business Cup - a series of tournaments for amateur business people; in Krakow, Katowice, Częstochowa, Wrocław, Szczecin, Poznań, Gdynia, Lublin and Warsaw,
- Poznań Tennis Conference - a conference aimed at tennis coaches,
- XVIII Beskid Cup - Polish Artists' Tennis Tournament.

Other activities

• BNP Paribas Young Talent

In 2024, the Bank continued its scholarship and development programme for young tennis players in Poland. In the third edition of the programme, the Bank had eight scholarship recipients under its care.

The Bank provides the scholarship recipients not only with a monthly financial stipend to support the development of a player's career, but also with various training courses, e.g. in public speaking, career planning, social media management,



cooperation with sponsors. Young tennis players also have the opportunity to participate in BNP Paribas Group tournaments, e.g. on a wild card basis, as a sparring partner or as a participant in group training sessions. They have also had the opportunity to go to the Roland Garros tournament. The Mariusz Fyrstenberg Tennis Foundation is the programme's content partner.

- **Dzieciaki do Rakiet**

After five years, the Bank has relaunched the 'Dzieciaki do Rakiet' competition aimed at children's tennis clubs. Clubs entering the competition were tasked with making a video entitled 'Why play tennis'.

- **Tennis Children's Day**

Children of the Bank's Premium Banking and Business Banking Customers in Bydgoszcz, Białystok and Częstochowa were invited to a full-day activity promoting tennis.

- **Economic and technological events**

In 2024, the Bank became a partner of several international events in Poland. During the congresses, the Bank's representatives shared knowledge and good practices in the areas of governance, finance, agribusiness, energy transition and sustainable development. They participated, among others, in:

- European Economic Congress in Katowice - the Bank was the main partner and partner of many sections related to the banking sector, the European Union and ESG issues,
- European Financial Congress in Sopot, where the leading thematic areas included cyber-security, financing of large investment projects, energy transition and artificial intelligence.

The Bank of Green Changes

Environmental responsibility is one of the Bank's commitments under the GO beyond strategy in the POSITIVE pillar. For years, the Bank has been committed to minimising the impacts of and addressing climate change. The Bank's Green Change Programme aggregates all the organisation's environmental activities.

The Bank for Green Change programme consists of:

- monitoring Customers and investments from an ESG perspective and implementing CSR policies, with a particular focus on decarbonisation processes,
- continuously developing our range of products and services to help our Customers make the transition to a low-carbon economy and green investments (described extensively in the Sustainable Finance chapter),
- real changes in the functioning of the organisation (so-called eco-improvements), leading to the minimisation of the negative impact of operations on the environment,
- educational activities aimed at employees in all areas of the Bank and external stakeholders, and establishing partnerships and supporting pro-environmental initiatives.

As part of minimising the environmental impact of our operational activities, our priorities are to reduce CO₂ emissions, implement new eco-efficiencies in the workplace, use energy from renewable sources and increase the proportion of hybrid and electric cars in the banking fleet.

Reducing the carbon footprint

The financial sector is extremely important for the development of the economy. Thus, it also has an impact on the carbon footprint of the real economy. In view of its environmental impact, among other things, the Bank has introduced a number of sectoral CSR policies and regulations for, i.a., the mining sector, the coal power sector and the fuel sector (for unconventional oil and gas resources), the agri-food sector aimed at decarbonising the Bank's portfolio and the climate impact of investments (e.g. by not financing coal mining or thermal coal combustion). For more on this topic, see Risks and opportunities, under ESG risks.

The Bank undertakes numerous operational measures to reduce greenhouse gas emissions. One of the key objectives of GO beyond Bank's business strategy is to reduce CO₂ emissions from operations. The Bank undertakes initiatives that address the reduction of energy consumption. It is also taking into account the reduction of its carbon footprint related to digital channels, marketing activities, communications and IT processes. As part of its fleet electrification, the Bank has increased the number of green cars it owns. For more on this, see chapter Sustainability Statement, Climate change section (ESRS E1).

Water

The water used at the Bank is sourced from mains water supply systems and, after consumption, is discharged into sewerage systems. The Bank uses water for domestic purposes - food and hygiene - and the scale of its consumption does not generate a significant negative environmental impact. Nevertheless, the Bank has consistently implemented solutions to reduce water consumption over the years. Amongst others, aerators have been installed in taps, motion sensors and electronic washing programmes, which allow a significant reduction in the water used in the Bank. As a natural consequence, the increasingly popular remote and hybrid operation modes are also reducing water consumption.

Table 15. Water consumption in the Group

	2024	2023
Water consumption (m ³)	37,294	39,910

Table 16. Water consumption at the Bank

	2024	2023
Water consumption (m ³)	36,987	39,825

Method of presenting indicators: data for locations where there was no meter data (lump sum, OE/rent water) was estimated based on average consumption/full-time equivalent in locations where we know the exact consumption from meters - average 0.5m³/full-time equivalent.



Materials and waste

Minimising plastic consumption

A selection of the Bank's initiatives to reduce plastic consumption:

- in 2019 the Bank has dropped orders of disposable plastic paraphernalia and water in plastic bottles,
- use of water dispensers, glass carafes and glasses,
- promoting in canteens to come with their own container and to use biodegradable or compostable cutlery and packaging,
- minimising the proportion of products in plastic packaging in vending machines in outlets,
- a significant reduction in the production of marketing gadgets - for new gadgets, the Bank, in collaboration with its suppliers, seeks to create the most useful products possible that are not solely a brand carrier.
- recycling outdated promotional material for use in, for example, bags and backpack.

Minimising paper consumption

Selected initiatives of the Bank to reduce paper consumption:

- printing bulk mailings to Customers and marketing flyers on certified recycled paper (in cooperation with suppliers),
- the use of recycled lightweight paper at the Bank's head offices,
- reducing the printing of correspondence and encouraging Customers to use digital versions (e-correspondence),
- digitalisation of an increasing number of processes,
- use of a special Autenti platform for electronic contract signing and digital document workflow.

Table 17. Group and Bank paper purchases in 2024

	Group	Bank
Purchase of paper (tonnes), of which:	187.7	184.1
share of certified and recycled paper	99.8%	99.8%

Table 18. Paper purchase at the Bank

tons	2024	2023
Paper used for internal operations	94.3	102.4
Paper used for marketing purposes	38.0	45.1
Bulk correspondence	50.2	55.6

tons	2024	2023
Other	1.6	4.0
Total	184.1	207.1

Waste segregation

In 2024, waste was segregated in all 4 of the Bank's head office buildings and 304 Customer Centres and 7 Business Centres, representing approximately 85% of all locations.

Waste segregation and disposal initiatives:

- coffee grounds recycling - since August 2022, we have collaborated with EcoBean, a startup that recycles coffee grounds into reusable products: straws, cups or pots. In 2024, 2.9 thousand kg of grounds were collected, and more than 7.6 thousand kg since the start of the collaboration,
- automatic segregation at the Bank's headquarters building in Warsaw - the Bin-e bin is an intelligent waste container that automatically recognises and segregates waste,
- segregation of electro-waste - containers in the Bank's head offices for batteries, light bulbs, caps, small electrical appliances, the donation of 140 pieces and the resale for a "symbolic zloty" of 215 pieces of office furniture as part of cooperation with public benefit institutions.

Community-based employee initiatives

We support the environmental engagement of the Bank's employees. In 2024, the following initiatives were implemented by employees through collaboration with the Administration Office:

- 150 birdhouses prepared in cooperation with the SPES Association for People with Disabilities,
- 1 thousand trees planted in cooperation with the Katowice Forestry Commission,
- Green Exchange Bank - dedicated space in the Bank's headquarters in Warsaw, Ruda Śląska and Kraków for the exchange of books and potted plants,
- third edition of the "Commute to work by bike" competition - 2024, the Bank's employees cycled a total of more than 15 thousand km,
- safe Journey picnic - road safety education and eco-workshops for employees and their families, forest cleaning in Krakow, Ruda Śląska and Warsaw.



Pillar STRONGER

Pillar description

Dynamic and, above all, effective growth will not be achieved without improving internal processes and a large-scale transformation of the IT area, using modern information technologies, such as cloud computing or open banking. The Bank plans to invest a total of approx. PLN 1.5 billion in technological improvements, aimed at supporting business development and doubling the pace of implementing new solutions. A thorough change of the technology used in the Bank will enable business scaling, as fast and cost-effective scalability is the basis of a modern digital bank and allows to go beyond the framework of traditional banking services.

The Bank is implementing an operational model focused on quality and is striving to optimize all key end-to-end processes. For this purpose, process mining tools, robotic process automation (RPA) and artificial intelligence are used.

The Bank also increases the use of the potential of the data. With the aid of advanced analytical tools that utilize modern technologies such as cloud computing, big data, and artificial intelligence in decision-making processes, the Bank aims to support its business development, enhance service quality, and bolster operational efficiency.

The fundamental assumption of the strategy is to maintain a safe and optimal capital and liquidity position and to meet the minimum regulatory requirements. The Bank's intention at the time of publication the strategy was to start paying dividends with the payout level reaching 50% of net profit in 2025.

In 2024, over 50% of the Bank's net profit for 2023 was allocated to the payment of dividend (DPS: PLN 3.41).

Strategic commitments and their implementation

Indicator	Strategic Objective 2025	Implementation 2024
Total investments in technology by 2025	PLN 1.5 billion	PLN 1.2 billion
Optimisation of all key end-to-end processes*	156 processes	79 processes
Increase in efficiency of operations [vs 2021]	>10% per annum	+13%
Number of use cases using artificial intelligence or advanced data analytics	>200	102
Dividend payout ratio	50%	>50%

* Target for process count increased from 38 to 156 according to the new Process Architecture organisation

Digitalisation and innovation – IT strategy

Implementation of the IT strategy

In 2022, the Bank began the implementation of the GO beyond strategy, aiming to become the digital bank of the future; it initiated wide-ranging actions in the technological field, formulating them within the framework of strategic actions named IT@Scale.

The IT@Scale strategy addresses both strictly infrastructural and process areas, including those related to strengthening cybersecurity, as well as issues related to the development of employee competencies and the recruitment of IT experts from a demanding external market. All actions are subordinated to the idea of IT and business unit partnership in an agile model of operation, addressing a flexible way of product development and modern, multi-channel Customer service.

The main initiative within the IT@Scale strategy is GOcore - a programme to modernise the Bank's central system environment, which is the centre of the corporate architecture, providing services to the entire Bank in a 24/7 working model. In 2024, the main focus has been on two streams of work: the reconstruction of payment support systems - the construction of the so-called Payment Factory Platform, which will ultimately replace a group of approx. 20 payment processing applications, and the implementation of a new repository of data about the Bank's Customers - the Customer 360 platform.

One area of focus for IT in 2024 was the potential for using generative artificial intelligence in banking processes. Further practical applications for streamlining and increasing the efficiency of business and IT processes were tested on the environment built in 2023 for the development and training of different language models. Four use cases using genAI technology were implemented in the IT area in production, including a Copilot-type tool to increase the efficiency of programming work (code verification, technical documentation creation, etc.).

A comprehensive assessment of the Bank's digital resilience (Digital Resilience), including cybersecurity, IT architecture and infrastructure, was conducted in 2024 to assess readiness for the challenges of a dynamic geopolitical environment, increasing regulatory requirements and escalating cyber threats. The analysis was conducted based on international norms and standards and market best practices. The first measures to strengthen the Bank's digital resilience have already been launched and will continue into 2025.

To date, IT@Scale's strategy implementation activities have gained recognition in the Polish and international markets. Amongst others, the New Technologies and Cybersecurity area received the following accolades in 2024: the title of winner in Forrester's Technology Awards, in the Technology Strategy Impact Award category, the title of winner in the Transformational Capabilities category in the Digital Excellence Awards organised by the CIONET organisation, and the second prize in the Gwiazdy Bankowości competition in the Technology and Innovation category awarded by Dziennik Gazeta Prawna and PWC. The Architecture as a Product concept, innovative in the market and implemented in 2023, was recognised in the Innovative Leader competition in the Innovative Product category and won third place in the competition organised by Forrester, in the Enterprise Architecture Award category.



Implementation of the IT@Scale Strategy in 2024

INITIATIVE		Deep transformation of the core banking ecosystem (GOcore)
INITIATIVE DESCRIPTION		<p>The transformation of the core banking ecosystem entails a comprehensive overhaul of the Bank's application architecture concerning the central system and systems directly associated with it. The purpose of this transformation is to shorten the time-to-market, enhance the efficiency of IT solutions and decrease the operational risk by doing the following:</p> <ul style="list-style-type: none"> • implementing IT platforms - scalable and reusable across various business domains (in the areas of payments, products and Customer data) • reducing the business logic and dependencies between the central system and other IT systems
ACHIEVEMENTS		<ul style="list-style-type: none"> • Golive of the Customer 360 platform, which is the source of the so-called Customer golden record - after completion of the process of deduplication of corporate and retail Customer data - start of the first stage of integration with the Bank's business applications • the first corporate Customer launched in production on the new Payment Factory payment platform (in terms of handling bulk payments) with the technical release of two new products: SEPA Instant (instant transfers in EUR) and BLIK cheques (functionality that allows you to collect funds or withdraw from an ATM without the need for Internet access, telephone or bank account) • full replacement of the central system infrastructure implemented in a way that is unnoticeable to end Customers and without affecting the continuity of Bank operations • conduct a comprehensive digital resilience assessment for the core banking ecosystem

INITIATIVE		Raising the maturity of IT management processes and services (Hyperautomation)
INITIATIVE DESCRIPTION		Improving the maturity of IT management processes and services through optimization, standardization and automation
ACHIEVEMENTS		<ul style="list-style-type: none"> • implementation of a new IT infrastructure management tool (more efficient management of resources, faster response to incidents, optimisation of operating costs) • IT service automation in the ServiceNow tool - reducing time to value, improving quality and consistency of service

INITIATIVE		Building a data platform (GOdata)
INITIATIVE DESCRIPTION		Improving and implementing solutions in the data area to create a scalable and secure platform ready to work in the cloud, providing consistent and integrated data and offering analysis capabilities available to the entire Bank

INITIATIVE		Building a data platform (GOdata)
ACHIEVEMENTS		<ul style="list-style-type: none"> • Improving the efficiency of business and IT processes through the implementation of chat-bots based on generative artificial intelligence solutions, developed by internal specialist units dedicated to AI • optimising software development by implementing a solution such as Copilot. The tool enables developers to among others: create test scenarios and technical documentation, adaptation of solutions created in "old" programming languages to modern java or python architectures

INITIATIVE		Building digital competencies (Engineering Culture)
INITIATIVE DESCRIPTION		Building the Bank's digital competencies through innovative reskilling and upskilling programs and promoting knowledge about new trends and technologies
ACHIEVEMENTS		<ul style="list-style-type: none"> • another edition of the innovative "I can DO IT" reskilling programme for Bank employees, enabling them to start a career path in new technologies, in the role of Solution Architect • the sixth edition of the UniversITy upskilling programme in new technologies with trainers from internal IT experts. Since 2022 more than 5,000 Bank employees have participated in this programme • 'GOtech Week' and GoTech Week on Tour - a series of events for the Bank's employees carried out in cooperation with leaders in technology solutions on the Polish market. The theme of this year's edition was new technology trends related to the development of AI and AI gen and building digital resilience in organizations (Digital Resilience)

INITIATIVE		Elimination of technological debt (GOmodulo)
INITIATIVE DESCRIPTION		Ensuring business units are supported in providing modern, scalable, and cost-effective system architecture
ACHIEVEMENTS		<ul style="list-style-type: none"> • improving processes and tools for identifying and managing technology debt within the implemented concept: Architecture as Product • modernising the Bank's IT ecosystem by: phasing out a further 10 obsolete production applications and reducing four solutions described as "critical debt"



INITIATIVE	Cloud transformation (GOcloud)
INITIATIVE DESCRIPTION	Building and consistently implementing a hybrid-multi-cloud environment based on the benefits of private and public clouds, in order to ensure IT service scalability and access to the latest tools and technologies.
ACHIEVEMENTS	<ul style="list-style-type: none"> • implementation of a scalable One Click platform based on the private cloud and the launch of the first services on the platform • a new cost model for services, providing application-level cost visibility and billing automation • increase the quality and availability of data for selected applications through the implementation of a scalable database platform (Exadata)

Internet and mobile banking

In 2024, the Bank continued intensive development of remote channels, implementing a series of functionalities aimed at strengthening its competitive position, lowering the cost of service delivery and raising the level of Customer service quality while ensuring the highest security standards.

The Bank's activities in the field of internet and mobile banking focused on providing maximum support to Customers in remote access to banking services and products. The Bank consistently introduces additional self-service processes to its electronic banking offer, enabling Customers to meet their most important needs daily without the need to visit a branch - from applying for additional products to after-sales service - from any device and at a time convenient for them.

The most important changes in the systems and offerings for retail Customers in 2024.

Payments

- the ability to save phone top-up templates
- the option to perform a transfer after 3:00 pm in the D+1 mode for SORBNET type transfers
- renewal of international transfers

Loans and cards

- new post-sale dispositions regarding mortgage loans
- introducing a change in the order in which cards are presented in response to the voice of the Customer
- extension of the loan period to 120 months
- addition of information on GAP insurance in car loans

Investment and savings

- the presentation of information on the amount of transaction costs to allow Customers converting investment funds to make an informed investment decision
- a new schedule of costs and fees to download in PDF format

The most important changes in the systems and offerings for retail Customers in 2024.

- new deposit offers
- enabling a fund return feature for Customers who have an IKZE account

Customer Data / Customer

- new Logout page for retail Customer segments
- adding the option to arrange a visit in the Customer Center in the Services tab for Retail Customers
- change in the presentation of limits for Micro Customers

Accounts and cards

- promotion for a personal account with the Żabka network through GOMobile
- adding a Mój Portfel tab aggregating all of the Customer's funds in GOMobile
- opening subsidiary and foreign exchange accounts for companies

Security

- behavioral protection for GOMobile Customers
- handling passwords for documents in GOonline
- QR CODE for the second and subsequent instance of the GOMobile application
- dual authentication for limit changes and transfers

The basis for building development plans in the field of internet and mobile banking is the voice of the Customer. Regular feedback, for example, through a Customer satisfaction survey, allows us to more efficiently identify the advantages and disadvantages of the services offered and better understand retail Customer needs.

The security of Customers is a fundamental element of the Bank's electronic banking development strategy, which is why the GOonline system has been enriched with additional mechanisms to prevent the potential effects of unauthorized access and campaigns promoting modern methods of authorization and responsible use of remote channels.

**Table 19. Data concerning Retail Customers**

Detailed list	System name	31.12.2024	31.12.2023	change %
Number of Customers / users using internet banking	GOonline	668,039	692,591	(3.5%)
Average monthly number of transactions in the Internet channel	GOonline	2,794,421	2,791,679	0.1%
Number of Customers / users using the mobile application (GOmobile)	GOmobile	1,260,673	1,171,343	7.6%
Number of Customers / users using mobile banking (mobile devices)	GOmobile+ GOonline	1,355,489	1,282,501	5.7%
Number of Customers / users using only the mobile application (GOmobile)	GOmobile	875,571	803,619	9.0%
Number of Customers / users using only mobile banking (mobile devices)	GOmobile+ GOonline	1,006,328	929,899	8.2%

The most important changes in the systems and offerings for business Customers in 2024

GOonline Business (and GOconnect Business)

- implementation of the new Cards module
- implementation of further functionalities: "Create transfer to sender" from the level of the list of incoming transfers in the transaction history
- in the Statements module, additionally adding the possibility to generate bank statements in XML format
- providing the functionality of saving the details of domestic and foreign payments to a PDF file
- providing 24/7/365 Express Elixir transfer services and importing domestic Express Elixir payments
- changes to the access password (extension of the number of characters in the password in accordance with the Bank's security standards, possibility to switch from a masked password to a full password, additional security features of the access password)
- provision of SWIF GPI functionality
- addition of access to the interest rate history of the account balance in the account details
- implementation of the functionality of changing diacritics to Polish characters during import of transfers (for domestic transfer imports and selected foreign imports)
- adaptation of import and export templates to the new ISO20022 in GOonline Business and GOconnect Business
- the release of the new GOconnect Business and new functionalities such as: downloading account balance interest history, exchange rates, transaction confirmations, downloading current messages / information issued by the Bank in GOconnect messages

The most important changes in the systems and offerings for business Customers in 2024

- addition of information about the new version of the application with the possibility to download it in the GOconnect Business Plus application

GOmobile Biznes

- providing an option in the Transfers menu to make an internal currency transfer between company accounts
- allowing you to write a transfer with a currency conversion option made in GOonline Business
- on the screen for SEPA transfers, addition of LEI identifier for the sender and recipient of the transfer and information clauses

Table 20. Data concerning Corporate and Small-Medium Enterprise Customers

Detailed list	System name	31.12.2024	31.12.2023	change %
Number of Customers actively logging in	GOonline Biznes	117,260	136,353	(14.0%)
Average monthly number of transactions	GOonline Biznes	6,835,064	7,062,997	(3.2%)
Number of Customers/users of the mobile application	GOmobile Biznes	34,881	29,526	18.1%

Bank cards

BNP Paribas Bank Polska S.A. collaborates with Mastercard and Visa organizations in the context of issuing and servicing payment cards. The card portfolio includes debit cards, credit cards, and cards with a delayed payment date.

As at 31 December 2024, the number of cards issued stood at 2 207 thousand, 246 thousand lower than in 2023. The recorded decrease is mainly related to the need to terminate inactive contracts on a cyclical basis, both for credit cards and debit card accounts.

Simultaneously, the Bank is pursuing acquisition activities to increase the number of cards and accounts. Current promotions require Customers to participate transactively in order to meet bonus sales. Participation in card payments is also supported by the Priceless Moments programme, through which Customers earn points for each card payment and can then redeem them for rewards.

Under the current debit card account offer, Customers may:

- open a My Premium Account with a dedicated My Premium Card or Multi-Currency Card,
- open an Open to You Account with the possibility of issuing four cards (Open to Today Card, Open to eWorld Card, Open to World Card and Multicurrency Card),



- take advantage of the Family Banking offer with the Adult Card issued to 13-18 year olds, the Selfie Card and the Selfie Micro Card issued to children aged 7-13,
- benefit from the dedicated offers of two new cards, the Visa Film Card and the Visa Tennis Card.

As part of My Premium Account and Open Account for You, in addition to the physical version of the card, it is also possible to receive a mobile card.

Table 21. Number of bank cards issued by the Bank

thousand pcs	31.12.2024	31.12.2023	change YoY	
			thousand pcs	%
Retail Customers' debit cards	1,415	1,604	(189)	(11,8%)
Retail Customers' credit cards	584	622	(38)	(6,1%)
Business debit cards	195	213	(18)	(8,4%)
Business cards with deferred payment	8	9	(0)	(4,7%)
Business credit cards	4	5	(1)	(13,0%)
Total	2,207	2,452	(246)	(10,0%)

* without cards for technical accounts

Support for innovation

The Open Innovation Office in 2024 continued activities in supporting product development and improving technological and operational efficiency at the Bank. It also expanded its educational and trend-tracking activities, which translate into potential for deployment.

The main tasks of the team are:

- supporting the Bank's units in obtaining and testing innovative solutions from start-ups and scale-ups,
- evaluating the potential and possibilities of implementing innovations,
- identifying new business models,
- educating and inspiring the Bank's units in terms of innovative solutions,
- the process of investing in innovative companies,
- implementing and conducting banking for innovative companies.

The Open Innovation Office collaborates with all units of the Bank, particularly with:

- the New Technologies and Cybersecurity Area - jointly developing new products and promoting the spirit of innovation,
- the Sustainability Area and the Sustainability Community - so that new products and services respond to sustainable development challenges both in environmental and social aspects.
- SME and Corpo Sales Area - for the Banking for Innovative Companies project

The Office Hours team has developed an Office Hours process (a proprietary process for sourcing and adapting innovations), which, from 2019 onwards, significantly simplifies internal procedures and increases the chances of the Bank sourcing cutting-edge technology solutions to adopt to its infrastructure and needs. In June 2024, it launched such a process to verify a product supporting managers and owners of residential buildings in the energy transformation of buildings as part of an energy pre-audit and assessment of the thermal modernisation potential of a building with RES (renewable energy sources) elements.

More information is available on the Bank's website: <https://www.bnpparibas.pl/innowacje/wdrazamy>.

Actions taken in 2024

Education and learning about the latest technological trends

Throughout 2024, the activity of promoting and educating around the latest trends from the world of innovation that are able to support the strategy and goals of individual Tribes and Product Owners continued. In total, nearly 80 meetings were held with innovative companies.

„Startup Coffee” – a series of events, thanks to which sales network employees and risk area employees can meet the most attractive and technologically advanced companies in Poland and their creators, our "Customers of tomorrow", who are changing the world and at the same time can support our transformation. In 2024, 6 webinars were held with startup founders and representatives of the innovation community from Poland, giving the Bank employees the opportunity to learn about the history of the foundation, story of entering the market and gaining position in business. The founders of companies such as Silent Eight, HCM Deck, HiPets, HR Hints, Synerise talked about their companies.

„Design without secrets” – a series of events aimed at building awareness in the field of User Experience Design, UX research, and the use of design systems. A design system is currently a key element of each digital product. During the meetings, you can find out how this system reduces the work time of interface design specialists and programmers responsible for digital products. Our guests are experts from technology companies, research institutions, and UX agencies who share their knowledge based on specific solutions implemented by them.

„The UX Guild” - a regular meeting during which a variety of topics related to UX design, user research and discovering new trends in the area of Customer and user experience design for digital products are discussed. Expert guest speakers, often industry leaders, share their experiences and knowledge, supporting guild participants in developing their skills and



understanding of the latest challenges in UX design. These meetings provide an excellent opportunity for networking and the exchange of ideas between staff. In 2024, there were six meetings.

User Experience UP (UX UP) development programme

In September 2024 the second edition of the User Experience UP (UX UP) development programme was ended. Currently, 24 persons of the 12 Tribes have been trained under the development programme. The User Experience UP (UX UP) development programme is a comprehensive 12-week education and training programme that offers in-depth knowledge in User Experience Design - that is, user experience design and supporting digital product development. The content and practical scope has been designed to meet the needs of employees in Tribes and Squads in collaboration with the HR team responsible for development - upskilling programmes.

Promoting an innovation ecosystem

Positive Impact Ecosystem

For years, the Bank has been co-creating the "Positive Impact Ecosystem" project with Koźmiński Business Hub. In June 2024, Koźmiński Business Hub published another report "Positive Impact Startups".

The objectives of these reports include highlighting companies carrying out the most interesting activities. The reports contain experts' statements on the Polish positive impact ecosystem, as well as descriptions of the activities of the most interesting start-ups of the given year. They also show innovative solutions proposed by positive impact start-ups in selected industries - from construction to education and sustainable fashion to health and responsible tourism.

We support innovative companies with financial products and a dedicated team of experts

The Open Innovation Office team continues to acquire and provide banking services to innovative companies at different stages of development. In addition to financing offers, we offer young, dynamically growing companies a full range of banking products - so far available only as part of Corporate Banking. We focus primarily on building long-term relationships - both with innovative companies and their investors, and looking for new development opportunities for them and a holistic support for development, which is why private and investment banking experts also joined the team. We already cooperate with over 200 innovative companies and their founders. Our goal is to make the Bank the financial institution of first choice for fast-growing innovative companies.

An important moment for the development of the business in the area of banking with innovative companies was the signing of an agreement with the European Investment Fund in October 2024 for the Bank to obtain a portfolio guarantee to secure the credit exposures of Customers in the innovative companies segment with support from the InvestEU Fund from the European Union. The new collateral will be made available to innovative Customers on offer at the beginning of the second quarter of 2025. This will enable the scale-up of the business and accelerate the acquisition of new Customers. At the same time, it serves as a prelude to intensifying efforts to seek external EU funds to support the activities of innovative companies in the corporate Customer and SME segments.

Together with the Sustainability Area and the team responsible for servicing Real Estate clients, the ESG Matchmaking event was organized - connecting the experience of large Customers of the Bank with an established position on the market with the innovation of startups. The event was highly appreciated by corporations and startups.

Investment policy

An investment policy has been implemented that allows strategic investments to be made in selected innovative companies that cooperate with the Bank. This allows for closer cooperation and development of the companies - the investments made so far are Autenti and Envirly. In addition, a process for reviewing the investments made has been implemented in collaboration with the Capital Investment Office, allowing a structured process for monitoring the progress of portfolio companies, and steps have been initiated to select the next investments in strategic companies in 2025.

Partnership

In 2024, the Office of Open Innovation has been establishing new partnerships and continuing previously initiated collaborations, making the Bank one of the most recognisable financial institutions in the startup ecosystem, which translates into attracting potential prospects among technology companies.

Partnership	Description
Startup Poland	The Bank has again become the main partner of the Polish Startups 2024 report - the most prestigious report examining the standards of startups in Poland. Thanks to this partnership, the Bank has strengthened its position as the closest organisation to startups on the market.
Endeavor Poland	Endeavor is a non-profit organisation of technology entrepreneurs from around the world. It provides entrepreneurs with strategic support to grow their companies, as well as a platform through which they can transfer their knowledge to help other Polish companies grow. Endeavor invests also in entrepreneurs through the co-investment-based Endeavor Catalyst fund. The Bank's Chief Innovation Officer is part of the Founding Board of Endeavor Poland. Together with Endeavor Polska foundation, we issued the first report that deeply analyses the multi-year development of the technological companies ecosystem and the accompanying challenges. The report is based on the many data analysis from over 700 Polish companies. This is also the first publication that focuses not only on the needs of the fastest-growing innovative companies, but also shows the potential of the Polish innovation ecosystem compared to other EU countries.
Aula Polska	In 2024, the Bank began cooperation with the Aula Polska Foundation, organising a series of events entitled Aula Polska, bringing together the largest entrepreneurial and technological community in Poland. One of the eight meetings organized (on the topic of Sales to Enterprise) took place at the Bank's Head Office.



Partnership	Description
CatapultX	The Bank joined the partners of the CatapultX Accelerator, which educates and advises founders of healthcare start-ups. Bank representatives share their knowledge on how to manage the collaboration between a start-up and the Bank well.
SWPS Booster	The Bank has joined the partners of the accelerator set up by SWPS University to support the development of startups creating solutions in the ESG industry, among others. As a Bank, we provide knowledge to startups that are selected for the accelerator in the field of corporate financial management.
Innovo Wannabe Founders	The Bank was a partner of the event organised by one of the biggest and best Venture Capital funds in Poland for people who want to set up their startup in the future.

Cybersecurity

In 2024, the Bank intensively strengthened the level of cybersecurity through a series of education and outreach activities aimed at both employees and Customers. Webinars, online courses and other forms of training were organised to raise employees' awareness of cybersecurity. At the same time, information campaigns were conducted for Customers through the website, social media, webinars, articles in the "Be one step ahead of a hacker" series and messages in the electronic banking system.

The security page on the Bank's official website, <https://www.bnpparibas.pl/bezpieczenstwo>, has been extensively revamped to improve its attractiveness, speed and the availability of practical recommendations for protecting against threats. These measures were in response to the growing risks associated with events in Ukraine and global instability.

In addition, the Bank continued to intensify its oversight of the ICT infrastructure, using state-of-the-art technology to ensure the highest level of data and system protection.

Implementation of the Strategy in 2024

INITIATIVE	Secure Tomorrow
INITIATIVE DESCRIPTION	Strengthening cybersecurity
ACHIEVEMENTS	<ul style="list-style-type: none"> • expansion of CyberBunker: securing critical applications against cyber attacks by creating isolated copies of data in an airtight DataCenter • significantly improve the security of the Bank's Customers in online channels by providing electronic banking Customers with behavioural protection within the GOMobile application

INITIATIVE	Secure Tomorrow
	<ul style="list-style-type: none"> • increase in the security of the Bank's infrastructure through the implementation of new Threat Intel tools and network infrastructure security including cloud-based solutions • continuation of the expansion of the system detecting false transactions with new functionalities in order to effectively protect the Customers' funds • introduction of technological solutions to counter telephone phishing and fraud • successfully conduct a series of regular successful relocation tests, notification tests, crisis simulation exercises/training and comprehensive disaster recovery tests of the core banking system and its interoperability with other electronic banking systems and channels • development of the PenTest Competence Centre to carry out internal penetration tests for critical banking applications • maintaining a high safety rating from Moody's „BitSight“ and Mastercard RiskRecon



Pillar TOGETHER

Pillar description

The Bank believes that an engaged and satisfied employee guarantees a high level of Customer satisfaction. Hence, it is crucial to provide an environment that supports the development of employees, their activity and creativity, but also accepts mistakes resulting from testing bold, non-standard solutions. To this end, the Bank promotes among employees values (empowerment, cooperation, courage, simplicity and transparency), the use of which in everyday work will allow us to dynamically respond to changing market conditions and contribute to the effective implementation of our strategic ambitions.

In order to ensure greater operational flexibility and better alignment of products and services to Customer expectations, the Bank began operating in a new working model, Agile@Scale, at the beginning of 2022. This is a modern, agile way of operating with a high level of independence and decision-making power for employees.

Strategic commitments and their implementation

Indicator	Strategic Objective 2025	Implementation 2024
Share of women on the Bank's Management Board [vs 2021: 22%]	30%	37.5%
Closing the gender pay gap [vs 2021: 7.3%]	<4.0%	3.8%
eNPS - employees' Net Promoter Score [vs 2021: -9]	20	27
People working within Agile@Scale (in Tribes)	>1,300	~1,700

Good workplace

Our key objective is to continually build an organisation that is an exceptional place to work attracting the best candidates from the labour market as well as nurturing motivation and performance among existing employees. Only committed and effective employees, managed by exceptional leaders, acting in the spirit of agile and in line with the values of the organisational culture will allow us to ensure market success.

We want to achieve this through the continuous development of leadership as well as future-oriented competences among our employees, enabling them to find their way and continuously develop in the current digital and changing times. A high standard of leadership and qualified employees with key competences and the values of the organisation are the basis for us to create an exceptional workplace. All of this, supported by efficient and digitised HR processes, an attractive employee offering and development opportunities, provides a complete picture of the organisation we are building. At the same time,

through our activities we support the transformation of the organisation into a more agile one, based on the 5 values that are the pillars of our organisational culture.

Our values: empowerment, collaboration, courage, simplicity and transparency

Building an inclusive, values-based organisational culture is a key element of the Bank's sustainability strategy and social responsibility. Accordingly, the Bank is taking a number of measures to strengthen collaboration and support opportunities for employees to realise their full potential while respecting diversity and equal opportunities. These actions have a significant impact on the success of the organisation - its innovation and reputation in the eyes of stakeholders.

Implementing culture requires several key elements:

- **Define inclusion values and mission**, including the introduction of policies that exclude any discrimination. At the Bank, we refer to the BNP Paribas Group Code of Conduct, which is a guideline for adhering to ethical and responsible business standards. We have defined values: empowerment, cooperation, courage, simplicity and transparency, underpinned by "MOGE". The whole determines the attitudes and behaviours of every working person. Since 2022, these values have been included in the evaluation process (EVP- Employee Value Proposition). They are embedded in GO beyond's strategy, and one of the pillars - #TOGETHER - refers to the organisational culture as the foundation for a diverse and inclusive working environment based on trust, courage and creativity.
- **Involving leaders** in the process of building and promoting values. Organisational culture is created by all people working at the Bank through the manifestation of behaviours and attitudes driven by values. Additionally, we ensure that managers at all levels are role models in this regard. In 2021-2022, we focused on building awareness and understanding of the organisational culture - we conducted a series of workshops, podcasts, testimonials, webinars and inspirational debates, and implemented a communication and visual campaign to internalise the five values and the foundation of 'MAY' among all employees.
- **Education and training** - we have a range of educational activities - both development programmes and activities to raise awareness of the importance of human rights in the broadest sense. In terms of the implementation of values, between 2022 and 2024 we conducted a series of workshops - Value Meetings - for almost 4,000 employees, resulting in, among other things, action plans related to improving the quality of the application of values in daily work.
- **Monitoring and measuring progress** - we regularly review the working atmosphere and the manifestations of behaviour embedded in our values - we examine the realisation of each value in our daily work at the Bank (Pulse Check), as well as using a regular feedback tool (Friday6), in which we observe, among other things, the behaviours that define the values.

Agile@Scale - a new operating model

The Agile@Scale transformation covers the part of the organization responsible for developing and implementing products (business, IT, support roles). The Bank is currently organized around products responsible for comprehensive processes and IT systems.



The Agile@Scale operational model was implemented in January 2022 and covers 17 Tribes, 5 IT areas, 60 Products and 58 Chapters. In addition, the pilot of the Beyond Agile way of working (a model that goes beyond Agile) has been extended to the retail distribution network and the Personal Finance area. At the end of 2024, these two working models Agile@Scale and Beyond Agile included almost 4,800 employees.

By implementing the Agile approach, the Bank aims to achieve the following goals:

- **FASTER** - by reacting more quickly to changing Customer needs and market conditions, measured by a change in the Time to Market indicator, which shows how fast we can implement new solutions. In 2024, Agile@Scale teams delivered 17% more solutions compared to 2023 and 3.5 times more solutions compared to 2022.
- **BETTER** - by delivering innovative, high-quality products and services based on Customer needs, measured by an increase in the NPS indicator, which shows how Customers recommend the Bank. In addition, the quality of the production process has improved through a significant reduction in critical errors, as well as improved systems availability.
- **HAPPIER** - through employee engagement, raising their competencies, and attracting and retaining talent. The Pulse Check employee opinion survey shows a significant improvement at the Bank level for almost all metrics, and Agile@Scale contributes to this. In particular, eNPS improved by 36 points from -9 in 2021 to 27 in 2024 (+4 points YoY) and the engagement index from 63% to 80% in 2024 respectively.

As in previous periods, we have continued in 2024 to focus on optimising generation processes and making ways of working more consistent between Tribe and other units in the Bank.

Employee satisfaction survey

A very important goal of the Bank is to continuously build a friendly and engaging work environment. The main element of taking care of such an environment is regularly listening to the voice of employees and responding to the feedback provided. The tool for collecting opinions is the Pulse Check survey. In 2024, it was conducted twice, and its results were analyzed by managers, HR Business Partners, Organizational Culture Team, and the Management.

eNPS Pulse Check indicator

eNPS	2024	2023
Question: How likely are we to recommend BNP Paribas Bank as an employer to our friends and family?	27	23

Employment

Table 22. Employment structure in the Bank and the Group

Employment	Number of active employees		Number of active FTEs	
	31.12.2024	31.12.2023	31.12.2024	31.12.2023
Group – total	7,512	7,740	7,478	7,703
Bank, including:	7,378	7,596	7,353	7,569
Headquarters	4,620	4,669	4,598	4,644
Customer Centres	2,642	2,802	2,638	2,800
Mobile advisers	74	85	74	85
Brokerage	37	35	37	35
Trade unions	5	5	5	5
BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A.	41	38	40	37
BNP Paribas Leasing Services Sp. z o.o.	13	13	7	7
BNP Paribas Group Service Center S.A.	80	90	79	86
Campus Leszno Sp. z o.o. (in liquidation in 2024)	-	3	-	3

Data expressed in terms of positions have been rounded to the full unit

Central employees include all employees in the support areas.

Employees of the Customer Centres include all employees of the sales network, consisting of, among others, the Market Development Department, the Wealth Management Regions, the Corporate and SME Banking Sales Network Division, and the Consumer Finance Sales Division.

Excluding technical posts. Technical FTEs refer to persons employed within the Group who are contracted for a specific FTE of 0.05, 0.0625 or 0.063 due to their tasks within the Group.

The employment level in the number of full-time positions at the end of December 2024 was: 7,883 in the Group (8,184 at the end of December 2023) and in the Bank: 7,746 (8,037 at the end of December 2023).

**7,512**Active employees
employed in the Group**7,378**Active employees
employed in the Bank**46%**Women in the top executive
management level (B1+B2) in the
Group**58%**Women in the lower-level
management in the Group

For more information on the workforce structure, please refer to the Sustainability Report chapter, in the Own Staff Resources section.

In December 2023, as a result of negotiations with the trade unions, the Agreement on the rules for carrying out group layoffs and on the Voluntary Redundancy Programme was signed. The Agreement was concluded for the period 2024-2025. The group redundancies will involve the termination of employment contracts with up to 800 employees. This number also includes employees who will be offered new terms and conditions of employment through change notices. In 2024 164 employees were terminated as part of the collective redundancy programme for 2024-2026 and 53 were terminated as part of the previous collective redundancy programme.

Employees' salaries

We implement in the Bank a rational, balanced and controlled remuneration policy, which is in line with our strategy, accepted level of risk, standards and key values. The policy is based on clear principles and addresses good market practices in terms of salaries. Formally, the rules related to salaries are set by the "Collective Labour Agreement" and the "Remuneration Policy for Employees of BNP Paribas Bank Polska S.A.". In addition, the Bank also operates a remuneration policy for persons who have a significant impact on the Bank's risk profile.

Incentive schemes

Incentive systems (bonus systems) are designed to support the Bank's strategy by rewarding employees for achieving their targets. They are based on the Management by Objectives (MbO) formula, which means that an employee's individual bonus is linked to the level of achievement of his or her objectives - both quantitative and qualitative. In addition, the combination of individual and team objectives illustrates to the employee the level of performance expected of him or her, taking into account the Bank's risk profile and attention to activities in line with the interests of the Customer.

The Bank operates:

- a bonus system defining the rules for the award and payment of variable remuneration, including bonuses, to employees working in positions with a significant impact on the Bank's risk profile (persons with MRT status),
- sales and quality bonus systems, which have been adapted to the specific tasks performed in the individual business lines, taking into account regulatory guidelines,
- operational and quality bonus schemes for specific groups of employees outside direct sales.

The Remuneration Committee and the Nominations Committee support the Supervisory Board in fulfilling supervisory duties in management of workplace. They monitor and supervise the most important processes - succession plans, employee career development, remuneration policy. The committees prepare opinions and recommendations for the Supervisory Board, which concern, among others, the assessment of candidates for members of the Management Board and candidates for members of the Supervisory Board, the terms of employment of members of the Management Board, including the amount of fixed and granted variable remuneration. The Bank carries out an annual wage regulation process (Compensation Review Process) - one of the significant criteria taken into account in this process is reducing the wage gap, for which dedicated funds are allocated.

At the end of 2024, the wage gap, as expressed in the adjusted wage gap indicator (Gender Pay Gap), was 3.8%. This means that men's wages were 3.8% higher than women's wages in comparable positions. The indicator is a weighted average of the size of the various employee groups. Compared to 2023, the ratio has decreased by 2.4 p.p. The Bank's strategic objective under the GO beyond strategy for 2022-2025 is to reduce the wage gap to below 4%.

Table 23. Adjusted output gap indicator

	2024	2023
Adjusted output gap rate (target 2025 - <4%)	3.80%	6.24%

We calculate the adjusted wage gap indicator for homogeneous employee groups to ensure transparency and consistency of data. We have divided employees into groups by area of employment and grade level - this allows us to compare the salaries of women and men who perform similar work. In calculating the indicator, we included all active employees with more than one year of service with the Bank and who remained employed at the end of December 2024. We included total salaries for comparable positions in the analysis.

Diverse and inclusive workplace

At the Group, we create a diverse community for many talents. The inclusive organizational culture, which has been consistently built for years, increases creativity, drives innovation, opens up new ideas, markets, Customers, builds a business advantage, and thus contributes to the development of employees and the success of the entire organization. We



base daily cooperation on trust and respect - we want everyone in our Bank to be able to express themselves, realize their career aspirations, passions, feel appreciated and have a sense of influence.

82 years

age of the oldest employee

42 years

average age of employees

19 years

age of the youngest employee

41 years

the longest length of service

Diversity management policy

Since 2016, the Bank's "Diversity Management Policy" has been in force, which promotes a work environment focused on respecting and optimally utilizing the potential inherent in the differences between employees. According to the provisions of the Policy, diversity is respected in every aspect of workplace management. We strictly adhere to these principles during the recruitment process, career development, and during training.

The policy sets out rules of conduct for managing the risk of discrimination and in terms of respecting diversity. We have established the position of Diversity and Inclusion Manager(s), whose responsibilities include overseeing and coordinating respect for diversity. Two people are also Diversity Officers at the Bank.

Employees who have experienced a lack of respect for themselves or others should primarily contact their supervisor or HR Business Partner in this matter. If for various reasons this is not possible, they can also use other channels (described in the Policy on dealing with violations in respect for others at BNP Paribas Bank Polska S.A.):

- mailbox: sprawypracownicze@bnpparibas.pl
- anonymous reports (whistleblowing).

All reports are considered by the Employee Relations Team, while cases involving behaviors that may indicate the occurrence of mobbing, discrimination, harassment or sexual harassment - are directed for consideration by the Employee Behavior Standards Committee.

In 2024, 17 reports of violations of respect for colleagues were investigated, of which the Employee Standards of Conduct Committee was appointed twice due to the severity of the allegations made.

The complaints examined mainly concerned inappropriate relations with a superior or between colleagues. Only in two cases were behaviours bearing the hallmarks of bullying and harassment confirmed.

All reports were analysed with due seriousness, thoroughly, fairly, and while maintaining full confidentiality.

The perpetrators of all misconduct reported at the Bank suffered consequences appropriate to the misconduct, and those affected received the necessary support.

Diversity and inclusion (D&I) management is part of the GO beyond business strategy for 2022-2025. In the TOGETHER PILLAR, we focus on a culture of courage, agency, and diversity, as a basis for supporting efficiency and creativity.

Our commitments to a diverse and inclusive workplace (D&I):

- at least 30% female representation in management positions by 2025,
- reducing the wage gap - the Bank's strategic objective is to reduce the wage gap to below 4% in 2025,
- increasing the employment of people with disabilities,
- monitoring of indicators relevant to D&I management, including, i.a., female vs. male participation in specific initiatives, parental leave take-up, retention rates by gender,
- BNP Paribas Group's cyclical survey on the Code of Conduct and diversity and inclusion,
- supporting bottom-up employee initiatives for groups at risk of exclusion.

Supporting diversity is one of the commitments in the global BNP Paribas Group strategy. The Group's Management Board is also involved, with measurable goals set in this area, cascaded down to individual countries. With the help of Group leaders and Diversity Officers, countries implement their local challenges respecting local conditions and supporting the potential of grassroots employee initiatives.



Financial performance

- 76** Group financial results
- 96** Business segment performance
- 100** Diverse and inclusive workplace



Group financial results

Consolidated statement of profit or loss

The BNP Paribas Bank Polska Group generated a net profit of PLN 2,358,268 thousand in 2024, by PLN 1,345,722 thousand (i.e. by 132.9%) higher than that achieved in 2023. Net profit excluding the impact of credit holidays would amount to PLN 2,414,542 thousand in 2024 and would be higher by 149.6% YoY.

The Group's net banking income in the analysed period amounted to PLN 7,752,716 thousand and was higher YoY by PLN 469,918 thousand, i.e. by 6.5% (excluding the impact of credit holidays, it would have amounted to PLN 7,822,190 thousand in 2024 and would have been higher by 8.2% YoY).

Significant factors influencing the level of the net banking income in 2024 and 2023 were the consequences of changes in the macroeconomic situation, including, above all, the level of inflation and the central banks' interest rate policy, which affected, among other things, economic activity and the situation on the financial markets. The most significant for the Group's results were:

- the persistently high level of interest rates as a consequence of the tightening of monetary policy by the Monetary Policy Council (MPC) in 2022. The first interest rate cuts took place in September and October 2023, when the MPC decreased rates by a total of 100 bps, from 6.75% to 5.75% for the reference rate. Since October 2023, NBP interest rates have remained unchanged. The high level of interest rates had a positive impact on the margins realized by banks in 2023 and 2024,
- the over-liquidity of the banking sector in Poland resulting from the good liquidity situation of Customers and the persistently moderate demand for credit, both in the case of businesses and private individuals. The comfortable situation on the funding side of the Group's business (faster growth in the average value of deposits compared with the relative stabilisation of the average value of the loan portfolio) enabled the optimisation of deposit margins and the generation of income from the placement of funds in financial market instruments, which had a positive impact on the Group's interest earnings in 2024,
- a lower, compared to 2023, negative result on derivatives under hedge accounting related to the scale and structure of hedging transactions and the expected pace and direction of interest rate movements. Interest income from IRS transactions (total on derivatives under fair value hedge accounting and under cash flow hedge accounting) is recognised in net interest income and improved by PLN 345,178 thousand YoY in 2024. The change in measurement to fair value of hedging transactions recognised separately in the result on hedge accounting in 2024 was positive and improved by PLN 32,885 thousand YoY,
- the factor negatively affecting the level of net interest income in 2024 compared to 2023 was the fact that the law regulating the so-called statutory credit holidays was amended in mid-May, allowing them to continue in 2024. The Bank recognised a negative impact of the credit holidays on gross profit in 2024 of PLN 69,474 thousand compared to a positive impact of PLN 55,722 thousand recognised in 2023.

The factors described above had a significant impact on the increase in net interest income in the analysed period. This result was by PLN 515,579 thousand, i.e. by 9.9%, higher YoY. The net interest income without taking into account the impact of credit holidays would have been higher YoY by PLN 640,775 thousand, i.e. by 12.4%.

A factor significantly affecting the level and comparability of the Group's net result remains the impact of legal risk associated with foreign currency housing loans. In 2024, the charge on this account was PLN 1,182,358 thousand (i.e. 59.8%) lower compared with 2023, amounting to PLN 795,728 thousand.

In addition, in 2024, the change in the estimate of deferred tax created based on provisions for future disbursements related to the process of cancellation of CHF loans had a positive impact on the Group's financial result (income tax burden) in the amount of PLN 135,535 thousand. In 2023, deferred tax additionally created based on provisions for settlement agreements concluded with Customers to CHF loan agreements had a positive impact on the Group's income tax charge in the amount of PLN 24,224 thousand. For details, see Note 53 Litigation and administrative proceedings Consolidated Financial Statements of BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024.

An increase in the cost base became apparent in 2024 compared to 2023, due to the impact of inflationary processes and the Group's ongoing investments. Total administrative expenses and depreciation and amortisation incurred in 2024 were by PLN 256,274 thousand, or 8.3%, higher than in 2023 (with personnel expenses increasing by PLN 108,694 thousand, or 7.5% YoY, and depreciation and amortisation expenses increasing by PLN 57,714 thousand, or 12.6%). Elements of the regulatory environment that negatively affected the level of costs in 2024 compared to 2023 included an increase in the value of the BFG contribution by PLN 20,083 thousand, i.e. by 16.2%.

In 2023, the good quality of the loan portfolio, non-recurring events and changes in forecasts of the macroeconomic situation had a positive impact on net allowances on expected credit losses of financial assets and provisions for contingent liabilities (low negative result of PLN 34,369 thousand). In 2024, this result was normalised (negative result of PLN 246,192 thousand), which means the low level of credit risk cost (-28 bps).

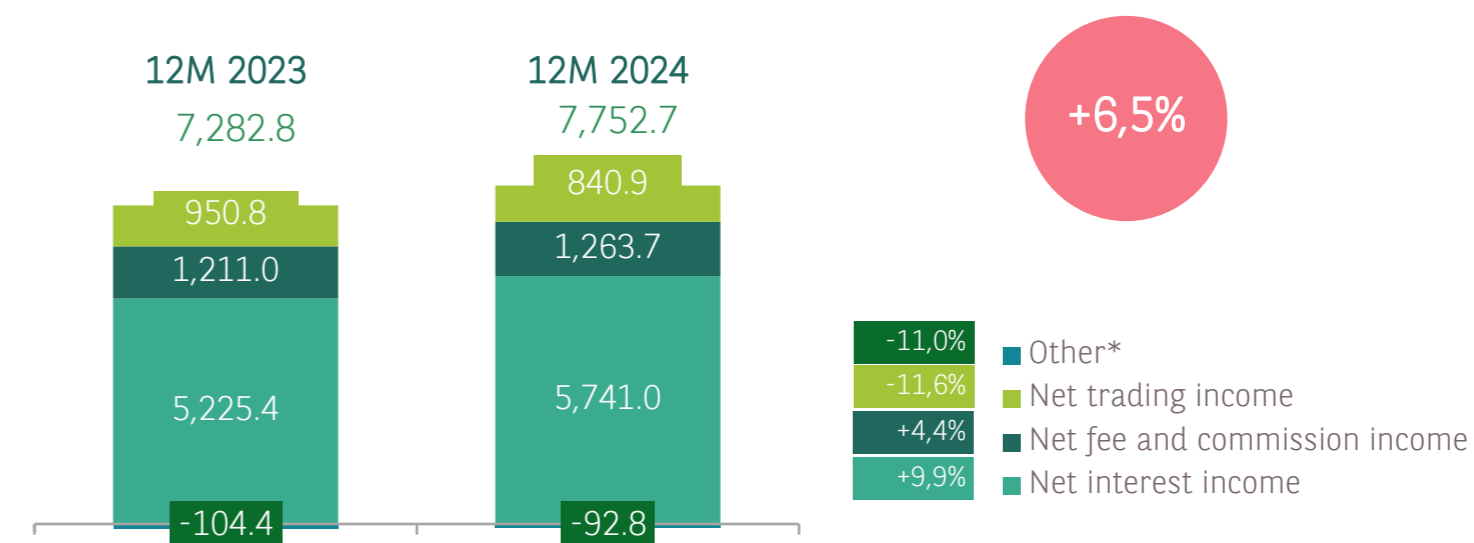


Table 24. Statement of profit and loss

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Net interest income	5,741,006	5,225,427	515,579	9.9%
Net fee and commission income	1,263,676	1,210,962	52,714	4.4%
Dividend income	13,147	10,881	2,266	20.8%
Net trading income	840,882	950,781	(109,899)	(11.6%)
Result on investing activities	14,374	(23,028)	37,402	-
Result on hedge accounting	1,946	(30,939)	32,885	-
Result on derecognition of financial assets measured at amortized cost due to significant modification	(11,569)	4,190	(15,759)	-
Other operating income and expenses	(110,746)	(65,476)	(45,270)	69.1%
Net banking income	7,752,716	7,282,798	469,918	6.5%
Net allowances on expected credit losses on financial assets and provisions for contingent liabilities	(246,192)	(34,369)	(211,823)	616.3%
Result on legal risk related to foreign currency loans	(795,728)	(1,978,086)	1,182,358	(59.8%)
General administrative expenses	(2,837,359)	(2,638,799)	(198,560)	7.5%
Depreciation and amortization	(514,450)	(456,736)	(57,714)	12.6%
Operating result	3,358,987	2,174,808	1,184,179	54.4%
Tax on financial institutions	(404,971)	(411,653)	6,682	(1.6%)
Profit before tax	2,954,016	1,763,155	1,190,861	67.5%
Income tax expenses	(595,748)	(750,609)	154,861	(20.6%)
Net profit	2,358,268	1,012,546	1,345,722	132.9%
Net profit excluding the impact of credit moratoria	2,414,542	967,411	1,447,131	149.6%

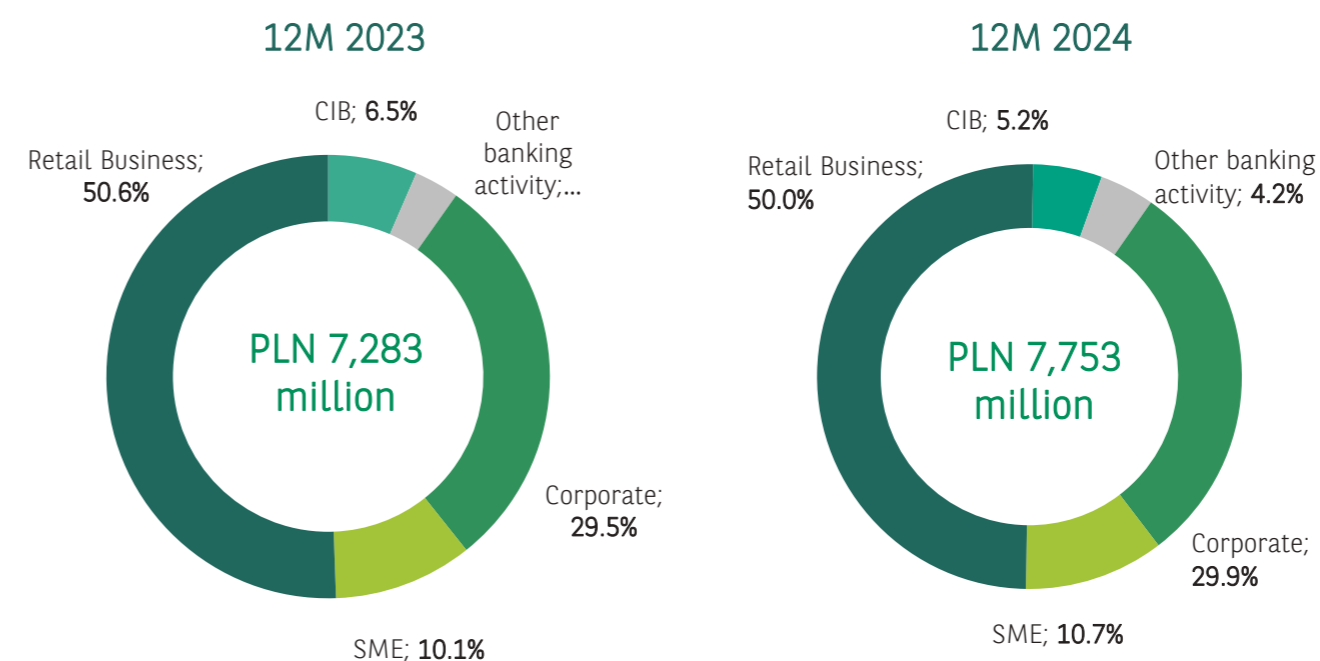
Note: Due to rounding, the individual values in the tables and charts of this Report may not add up

Graph 14. Structure of the net banking income (PLN million)



* The 'Other' category includes result on investment activities, result on hedge accounting, dividend income and other operating income and expense

Graph 15. Net banking income by segment



The structure of the net banking income by segment in 2024 has not changed significantly compared to 2023. The slight decrease in the share of CIB is, among other things, the result of a large one-off transaction in Q3 2023 translating into a high level of net trading income in 2023. The result of Retail and Business Banking in 2024 is burdened by the negative impact of credit holidays.



Net interest income

Net interest income, which is the Group's main source of revenue, amounted in 2024 to PLN 5,741,006 thousand and was higher YoY by PLN 515,579 thousand, i.e. by 9.9%. Without considering the impact of loan holidays, the interest result in 2024 would be PLN 640,775 thousand, i.e. 12.4% higher, compared to 2023. In analyzed period, net interest income was higher by PLN 417,823 thousand, i.e. by 4.3%, with a slight decrease in interest expenses by PLN 97,756 thousand, i.e. by 2.1%.

An important external factor affecting the net interest income is the policy of the Polish National Bank (NBP) in shaping interest rates. In 2021 and 2022, the Monetary Policy Council (MPC) made a total of 11 interest rate increases by 665 basis points to a level of 6.75% for the reference rate, and then in September and October 2023 reduced the reference rate by a total of 100 basis points (to a level of 5.75%). The estimate of the sensitivity of the interest result to changes in interest rates is described in the Risk and Opportunities Chapter of the Management Board's Report on the activities of the BNP Paribas Bank Polska Capital Group in 2024.

Table 25. Net interest income

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2023	change YoY	
			PLN thousand	%
Amounts due from banks	428,039	486,681	(58,642)	(12.0%)
Loans and advances to Customers measured at amortised cost	6,739,682	7,181,489	(441,807)	(6.2%)
Loans and advances to Customers measured at amortised cost through profit or loss	50,227	80,349	(30,122)	(37.5%)
Debt instruments measured at amortised cost	972,653	743,329	229,324	30.9%
Debt instruments measured at fair value through profit or loss	7,466	6,928	538	7.8%
Debt instruments measured at fair value through other comprehensive income	850,362	658,027	192,335	29.2%
Derivative instruments as part of fair value hedge accounting	854,393	403,209	451,184	111.9%
Derivative instruments as part of cash flow hedge accounting	11,628	11,627	1	0.0%
Purchased repo transactions	330,633	255,621	75,012	29.3%
Total interest income	10,245,083	9,827,260	417,823	4.3%
Amounts due to banks	(725,863)	(648,184)	(77,679)	12.0%

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2023	change YoY	
			PLN thousand	%
Debt securities issued	-	(3,154)	3,154	(100.0%)
Amounts due to Customers	(2,437,170)	(2,710,869)	273,699	(10.1%)
Leasing liabilities	(23,282)	(28,771)	5,489	(19.1%)
Derivative instruments as part of fair value hedge accounting	(1,275,490)	(1,161,945)	(113,545)	9.8%
Derivative instruments as part of cash flow hedge accounting	(36,561)	(44,099)	7,538	(17.1%)
Purchased repo transactions	(5,711)	(4,811)	(900)	18.7%
Others related to financial assets	-	-	-	-
Total interest expense	(4,504,077)	(4,601,833)	97,756	(2.1%)
Net interest income	5,741,006	5,225,427	515,579	9.9%

As a result of the changes in interest rates described above and expectations of future interest rate levels, the profitability of loan products in 2024 was lower compared to 2023. The sum of interest income on loans and advances to Customers measured at amortised cost and at fair value through profit or loss amounted to PLN 6,789,909 thousand in 2024 and was lower by PLN 471,929 thousand, or 6.5%, than the income realised in 2023.

The extension of the so-called statutory credit holidays until the end of 2024 was also a factor that reduced the value of interest income on loans and advances. Due to the passing by the Sejm and signing by the President of the Act of 12 April 2024 on amendments to the Act on support for borrowers who have taken out a home loan and are in financial difficulty and the Act on community financing for economic undertakings and assistance to borrowers (the "Act"), allowing Customers to suspend the performance of mortgage loan agreements granted in PLN in the period from 1 June 2024 to 31 December 2024 for a total of 4 months, the Bank recognised a negative impact of PLN 69,474 thousand in the 2024 results compared to a positive impact of PLN 55,722 thousand in 2023. For more detailed information, see Note 3 Estimates of the Consolidated Financial Statements of BNP Paribas Bank Polska Group for the year ended 31 December 2024.

Excluding the impact of credit holidays, total interest income on loans and advances to Customers in 2024 would be PLN 346,733 thousand, i.e. 4.8% lower than in 2023.

Among the factors that positively influenced the level of interest income in 2024 compared with 2023 were the very good liquidity situation and the increase in the scale of the Group's operations reflected, i.a., in the increase in the average value of the securities portfolio. As a result, the Group recorded an increase in interest income on debt instruments measured at amortised cost and at fair value by a total of PLN 422,197 thousand, i.e. by 30.0%.



Active management of excess liquidity was reflected in an increase in interest income from reverse repo transactions by PLN 75,012 thousand (interest expenses on repo transactions were higher by PLN 900 thousand YoY). At the same time, interest income on receivables from banks decreased by PLN 58,642 thousand and costs on amounts due from banks increased by PLN 77,679 thousand (i.a. due to an increase in MREL funding from December 2023).

The over-liquidity of the banking sector and the differences in the level of market interest rates between 2024 and 2023 contributed to a decrease in the cost of deposits. Moderate credit demand from corporate and retail Customers and the Group's comfortable liquidity position (the net loans/deposits ratio at the end of 2024 was 65.80% compared to 68.1% at the end of 2023) favoured the optimisation of deposit margins. As a result, interest expenses on amounts due to Customers amounted PLN 2,437,170 thousand in 2024 and were lower by PLN 273,699 thousand, or by 10.1% in comparison with the costs incurred in 2023.

The level of net interest income is affected by the Group's use of fair value hedge accounting and (to a much lesser extent) cash flow hedge accounting. The change in the fair value measurement of hedging transactions is recognised in the result on hedge accounting. Interest on IRS transactions and hedged items is recognised in net interest income. Net interest income on hedging relationships (the sum of interest income and interest expense on derivatives under fair value and cash flow hedge accounting) in 2024 was negative at PLN 446,030 thousand, compared to a negative result of PLN 791,208 thousand in 2023 (a decrease in the negative impact of PLN 345,178 thousand YoY).

Net fee and commission income

The Group's net fee and commission income in 2024 amounted to PLN 1,263,676 thousand and was PLN 52,714 thousand (i.e. 4.4%) higher than that obtained in 2023. This was mainly the result of an improvement in commission income in the areas of bank cards, asset management and brokerage operations and for account servicing, despite weaker commission income from lending activities.

Fee and commission income amounted to PLN 1,542,772 thousand and was higher by PLN 70,173 thousand (i.e. by 4.8%) compared with 2023, while commission expenses amounted to PLN 279,096 thousand and increased by PLN 17,459 thousand (i.e. by 6.7%).

The increase in fee and commission income was mainly related to:

- payment and credit card services by PLN 36,663 thousand, i.e. by 9.7% (primarily due to higher revenues generated from the introduction of a new service in Q2 2024 - card transactions in the form of transfers and from cooperation and settlements with Euronet and Mastercard). In addition, as a result of among other things the growing number of card transactions, income from interchange fees, use of credit cards and currency conversions increased,
- asset management and brokerage operations by PLN 33,551 thousand, i.e. by 32.6% (primarily due to higher revenues from the sale and management of investment funds, custody and brokerage services),
- other commissions by PLN 19,178 thousand, i.e. by 48.7% (among other things, due to higher commissions related to M&A transactions and cooperation in the area of long-term car rental),

- account maintenance by PLN 17,654 thousand, i.e. by 7.8% (i.a., from the maintenance and servicing of retail Customer accounts and income from account closures),
- cash transfers and e-banking services by PLN 5,235 thousand, i.e. by 5.1% (as a result of higher commission income from domestic and foreign payments),
- insurance mediation activity by PLN 3,815 thousand, i.e. by 2.3% (i.a., as a result of an increase in income from the sale of life insurance linked to cash loans).

The decrease in net fee and commission income was mainly related to:

- loans, advances and leases by PLN 45,258 thousand or 13.5% (i.a., due to lower revenues from Retail and Business Banking loans, including those related to loans to farmers, and lower - compared to the high level of 2023 - revenues from transactions with large corporate Customers),
- cash service by PLN 2,843 thousand, i.e. by 8.3% (i.a., due to lower revenues from banknote transactions, cash handling performed in cooperation with the Polish Post Office and cash collection from corporate Customers).

The increase in commission and fee expenses was mainly due to higher expenses by PLN 8,131 thousand, i.e. by 822.1%, on guarantees and documentary operations (on account of the financial guarantee in connection with the transfer of the risk of the securitised portfolio) and higher expenses on account of payment and credit cards by PLN 2,927 thousand, i.e. 2.5% (related to higher costs of commissions paid to organisations and entities servicing card transactions).

Table 26. Net fee and commission income

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2024	change YoY	
			PLN thousand	%
Fee and commission income				
loans, advances and leases	289,250	334,508	(45,258)	(13.5%)
account maintenance	245,151	227,497	17,654	7.8%
cash service	31,462	34,305	(2,843)	(8.3%)
cash transfers and e-banking	108,047	102,812	5,235	5.1%
guarantees and documentary operations	77,320	74,589	2,731	3.7%
asset management and brokerage operations	136,578	103,027	33,551	32.6%
payment and credit cards	414,307	377,644	36,663	9.7%
insurance mediation activity	169,441	165,626	3,815	2.3%
product sale mediation and Customer acquisition	12,667	13,220	(553)	(4.2%)



PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2024	PLN thousand	%
other commissions	58,549	39,371	19,178	48.7%
Total fee and commission income	1,542,772	1,472,599	70,173	4.8%
Fee and commission expense				
loans, advances and leases	(1,294)	(917)	(377)	41.1%
account maintenance	(9,774)	(10,789)	1,015	(9.4%)
cash service	(28,566)	(26,198)	(2,368)	9.0%
cash transfers and e-banking	(2,765)	(3,137)	372	(11.9%)
guarantees and documentary operations	(9,120)	(989)	(8,131)	822.1%
asset management and brokerage operations	(6,647)	(6,488)	(159)	2.5%
payment and credit cards	(120,616)	(117,689)	(2,927)	2.5%
insurance mediation activity	(21,487)	(20,272)	(1,215)	6.0%
product sale mediation and Customer acquisition	(23,011)	(21,389)	(1,622)	7.6%
other commissions	(55,816)	(53,769)	(2,047)	3.8%
Total fee and commission expenses	(279,096)	(261,637)	(17,459)	6.7%
Net fee and commission income	1,263,676	1,210,962	52,714	4.4%

Dividend income

Dividend income in 2024 totalled PLN 13,147 thousand and came from the profits of companies for 2023 in which the Bank held a minority interest, i.e.: among others, Biuro Informacji Kredytowej S.A. (PLN 4,131 thousand), Krajowa Izba Rozliczeniowa S.A. (PLN 2,125 thousand), VISA (PLN 1,614 thousand) and Mastercard (PLN 235 thousand).

Dividend income in 2023 totalled PLN 10,881 thousand and came mainly from the profits of companies for 2022 in which the Bank held minority interests, i.e.: among others, Biuro Informacji Kredytowej S.A. (PLN 3,942 thousand), Krajowa Izba Rozliczeniowa S.A. (PLN 1,856 thousand), VISA (PLN 664 thousand).

Net trading income and result on investment activities

Net trading income in 2024 amounted to PLN 840,882 thousand and was lower by PLN 109,899 thousand, i.e. by 11.6% YoY. The level and volatility of this result are mainly shaped by the result on foreign exchange and derivative transactions with

Customers, the result on transactions concluded by CIB and the Asset and Liability Management Division and the valuation of equity instruments.

The decrease in the result from trading activities in 2024 compared to the same period of the previous year was mainly related to the achievement of a lower margin on foreign exchange and derivative transactions with Customers (a decrease of PLN 79,850 thousand, i.e. 9.9% YoY related primarily to the absence of non-recurring transactions comparable to Q3 2023), a lower result on financial instruments transactions in the ALMT and CIB area and a lower result from the valuation of IRS hedging the portfolio of loans and advances to Customers measured at fair value through profit or loss.

The result on equity instruments measured at fair value through profit or loss amounted to PLN 22,267 thousand, an increase of PLN 1,498 thousand, or 7.2%, compared to 2023.

The result on investment activities in 2024 was a positive PLN 14,374 thousand compared to a negative result of PLN 23,028 thousand in 2023 (an improvement of PLN 37,402 thousand).

The increase in the result investment activities was mainly related to a PLN 27,065 thousand higher positive result from the valuation of the portfolio of loans and advances to Customers measured at fair value through profit or loss and a PLN 12,345 thousand higher positive result from debt instruments measured at fair value through other comprehensive income (sale of securities) compared to 2023.

Other operating income

Other operating income in 2024 amounted to PLN 214,381 thousand, down by PLN 22,547 thousand, or 9.5%, YoY.

The change in the level of other operating income was mainly due to:

- revenue lower by PLN 36,619 thousand (i.e. by 65.2%) from the release of provisions for litigation and other liabilities (i.a., due to the release in Q2 2023 of PLN 26,626 thousand of the provision created in 2020 for the penalty imposed by the Office of Competition and Consumer Protection (OCCP) in connection with declaring certain provisions of the contractual standard concerning the determination of exchange rates (the so-called anti-spread annex) to be unauthorized as a result of the Court of Appeal's judgment of 12 May 2023),
- lower by PLN 1,826 thousand (i.e. 8.7%) revenue from the sale or liquidation of property, plant and equipment and intangible assets,
- higher revenues from leasing operations by PLN 5,968 thousand (i.e. 11.8%)
- higher revenues from the sale of goods and services by PLN 4,851 thousand (i.e. 65.8%),
- higher by PLN 2,636 thousand (i.e. 13.5%) revenues from the recovery of debt collection costs.

**Table 27. Other operating income**

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Sale or liquidation of property, plant and equipment and intangible assets	19,263	21,089	(1,826)	(8.7%)
Impairment allowances on other receivables	8,104	6,602	1,502	22.8%
Sale of goods and services	12,224	7,373	4,851	65.8%
Release of provisions for litigation and claims and other liabilities	19,525	56,144	(36,619)	(65.2%)
Recovery of debt collection costs	22,098	19,462	2,636	13.5%
Recovered indemnities	262	513	(251)	(48.9%)
Leasing operations	56,398	50,430	5,968	11.8%
Other operating income	76,507	75,315	1,192	1.6%
Total other operating income	214,381	236,928	(22,547)	(9.5%)

Other operating expenses

Other operating expenses in 2024 amounted to PLN 325,127 thousand and were higher by PLN 22,723 thousand (i.e. 7.5%) YoY.

The level of other operating expenses was mainly influenced by:

- higher by PLN 27,026 thousand (i.e. 22.2%) other operating expenses (i.a., due to creating of provision for potential costs of court proceedings resulting in cancellation of loan agreements),
- higher by PLN 15,445 thousand (i.e. 55.7%) costs of leasing operations,
- higher by PLN 2,618 thousand (i.e. 31.6%) costs due to impairment allowances on other receivables,,
- lower by PLN 10,643 thousand (i.e. by 15.2%) the costs of provisions for litigation and claims and other liabilities,
- lower by PLN 7,284 thousand (i.e. 76.6%) costs of compensations, penalties and fines
- lower by PLN 3,434 thousand (i.e. 30.3%) the cost of donations made.

Table 28. Other operating expenses

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Loss on sale or liquidation of property, plant and equipment and intangible assets	(14,200)	(16,699)	2,499	(15.0%)
Impairment allowances on other receivables	(10,904)	(8,286)	(2,618)	31.6%
Creation of provisions for litigation and claims and other liabilities	(59,407)	(70,050)	10,643	(15.2%)
Debt collection	(38,591)	(37,097)	(1,494)	4.0%
Donations made	(7,894)	(11,328)	3,434	(30.3%)
Costs of leasing operations	(43,182)	(27,737)	(15,445)	55.7%
Costs of compensations, penalties and fines	(2,219)	(9,503)	7,284	(76.6%)
Other operating expenses	(148,730)	(121,704)	(27,026)	22.2%
Total other operating expenses	(325,127)	(302,404)	(22,723)	7.5%

Net allowances on expected credit losses of financial assets and provisions for contingent liabilities

Net allowances on expected credit losses of financial assets and provisions for contingent liabilities in 2024 was a negative result of PLN 246,192 thousand compared to a negative result of PLN 34,369 thousand in 2023 (a deterioration of PLN - 211,823 thousand).

Considering the main operating segments:

- Retail and Business Banking segment negative result (PLN -1,369 thousand), an improvement of PLN 52,749 thousand,
- SME Banking segment positive result (PLN +555 thousand), worsening result by PLN 6,889 thousand,
- Corporate Banking segment (including CIB) negative result (PLN -245,806 thousand), deterioration of result by PLN 258,080 thousand,
- the other banking activities segment recorded a positive result (PLN +429 thousand), an improvement in the result of PLN 398 thousand.

The difference in the cost of risk in the comparative years was significantly influenced by material recoveries from the institutional Customer portfolio realised in 2023 (PLN 95,593 thousand on two significant Customers) and by the release of provisions as a consequence of the update of macroeconomic expectations (provisions set up in earlier years).



The development of the cost of risk in 2024 was significantly influenced by the continued good quality of the loan portfolio. In particular, the Group recorded low materialisation of risk in the retail segment as reflected in the low levels of Stage 3 entries.

Non-recurring events did not have a significant impact on the development of the cost of risk in 2024. An increase in the level of provisions for the expected future materialisation of the cost of risk in the institutional portfolio was observed, with a parallel release in the retail portfolio. In particular, the following non-recurring events had an impact on the 2024 write-down result:

- linking additional provisions in the form of Post Model Adjustment for risk factors identified in the institutional portfolio, including:
 - PLN 72,800 thousand adjustment for Customers operating in sectors exposed to the German economy (automotive, furniture and large domestic appliance manufacturing sectors),
 - PLN 51,258 thousand in relation to the portfolio risk of farmers whose crops were affected by adverse weather events (including hailstorms and summer droughts),
 - PLN 31,500 thousand in connection with sensitive Customer risk in the commercial property segment,
- the release of PLN 32,655 thousand of provisions for the future materialisation of risk in the retail segment, including provisions created in connection with the delayed recognition of the materialisation of risk in the case of receivables from Customers taking advantage of credit holidays,
- adjusting the level of write-downs to expectations of the future macroeconomic situation, resulting in a PLN 21,535 thousand tie-up of provisions (including a tie-up of PLN 41,076 thousand in the institutional portfolio with a release of PLN 19,541 thousand in the retail portfolio), as a result of updating the forecasts of macroeconomic variables included in the IFRS9 model used,
- parameter changes and updates resulting in the release of PLN 77,357 thousand of provisions (mainly on the institutional Customer portfolio),
- positive result related to the sale of receivables of PLN 59,266 thousand (of which PLN 51,824 thousand related to institutional Customers),
- the creation of provisions for legal risk for the portfolio secured by real estate in CHF, which resulted in the release of write-downs (ECL) for this portfolio in the amount of PLN 19,988 thousand.

In 2024, the Group entered into agreements to sell from the retail, SME and corporate portfolios. The gross carrying amount of the sold portfolio measured at amortised cost was PLN 430,520 thousand, the amount of impairment losses created was PLN 291,643 thousand. The contractual price for the sale of these portfolios was set at PLN 198,143 thousand. The net impact on the Bank's result due to the sale of portfolios amounted to PLN 59,266 thousand and is presented in the line net allowances on expected credit losses of financial assets and provisions for contingent liabilities.

In 2023, the Group entered into agreements for the sale of a portfolio of loans from the retail, SME and corporate portfolios. The gross carrying amount of the sold portfolio measured at amortised cost was PLN 390,429 thousand, the amount of impairment losses created was PLN 330,357 thousand. The contractual price for the sale of these portfolios was set at PLN 86,588 thousand. The net impact on the Bank's result from the sale of the portfolios amounted to PLN 26,516 thousand and is presented in the line net allowances on expected credit losses of financial assets and provisions for contingent liabilities.

The cost of credit risk, expressed as the ratio of the result from allowances to the average gross loans and advances to Customers measured at amortised cost (calculated on the basis of the balances at the end of the quarters), was in 2024 - 0.28% compared with -0.04% in 2023. Excluding the impact of the sale of receivables, it is estimated that the cost of risk would be -0.35% in 2024 and -0.07% in 2023.

General administrative expenses and depreciation and amortization

The Group's general administrative expenses (including depreciation and amortisation) for 2024 amounted to PLN 3,351,809 thousand, an increase of PLN 256,274 thousand, or 8.3%, compared to 2023.

Table 29. General administrative expenses and depreciation and amortization

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Personnel expenses	(1,554,054)	(1,445,360)	(108,694)	7.5%
Marketing	(104,517)	(82,091)	(22,426)	27.3%
IT and telecom expenses	(312,287)	(275,764)	(36,523)	13.2%
Short-term lease and operation	(83,229)	(84,925)	1,696	(2.0%)
Other non-personnel expenses	(234,065)	(218,302)	(15,763)	7.2%
External services under other contracts and consulting	(341,647)	(347,416)	5,769	(1.7%)
Business travels	(11,783)	(13,721)	1,938	(14.1%)
ATM and cash handling expenses	(29,952)	(28,407)	(1,545)	5.4%
Costs of outsourcing services related to leasing operations	(1,445)	(2,775)	1,330	(47.9%)
Bank Guarantee Fund fee	(143,992)	(123,909)	(20,083)	16.2%
Commercial Bank Protection Scheme fee	-	(275)	275	(100.0%)
Polish Financial Supervision Authority fee	(20,388)	(15,854)	(4,534)	28.6%
Total general administrative expenses	(2,837,359)	(2,638,799)	(198,560)	7.5%



PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Depreciation and amortization	(514,450)	(456,736)	(57,714)	12.6%
Total costs	(3,351,809)	(3,095,535)	(256,274)	8.3%

An increase in the level of costs YoY was recorded in the following categories:

- Personnel expenses - an increase of PLN 108,694 thousand, i.e. by 7.5%, as a result of: an increase in salary costs by PLN 110,871 thousand (annual increase in basic salaries from March 2024), higher bonus costs, which increased mark-ups on salaries by PLN 19,805 thousand, and lower costs of provisions for restructuring in 2024; in December 2023, an Agreement was signed with the trade unions operating in the Bank on the principles of group redundancies. A provision was also created for the costs of employment restructuring, which was charged to 2023 costs in the amount of PLN 22,068 thousand. The increase in staff costs related to salary increases was to some extent mitigated as a result of the reduction in the Group's headcount by 222 FTEs (active) YoY;
- IT and telecom expenses - up by PLN 36,523 thousand, or 13.2% - driven by an increase in the Bank's costs for software maintenance contracts, higher costs for BNP group systems, licence fees, CyberSecurity and Contact Centre Customer service costs and core banking systems. IT costs in other Group companies increased YoY by PLN 2,729 thousand, mainly in the leasing company;
- Marketing - an increase of PLN 22,426 thousand, i.e. 27.3% - mainly due to a higher number of campaigns in 2024 (an increase in promotion and media advertising costs) and higher event organisation costs (an increase in market prices for these services, the number of events and meetings organised, an increase in the number of guests invited), while sponsorship costs decreased (the BNP Paribas Warsaw Open tennis tournament was organised in 2023);
- Bank Guarantee Fund (Bankowy Fundusz Gwarancyjny) fee - an increase of PLN 20,083 thousand, i.e. 16.2% - due to an increase in the annual contribution to the banks' forced restructuring fund. The Bank has not borne the cost of the contribution to the banks' guarantee fund since Q2 2022, in accordance with the BFG's decision to suspend its collection;
- Other non-personnel expenses - an increase of PLN 15,763 thousand, or 7.2%, of which:
 - Notary and court fees - an increase of PLN 23,214 thousand due, among other things, to higher costs relating to CHF loans (PLN 48,299 thousand in 2024 vs. PLN 25,221 thousand in 2023),
 - material costs incurred by the other Group companies - a decrease of PLN 4,862 thousand.

Between 2023 and 2024, the Bank did not incur a charge for the Borrower Support Fund (Fundusz Wsparcia Kredytobiorców).

The decrease in the level of costs in the item External services for other contracts and consultancy by PLN 5,769 thousand, i.e. by 1.7%, is due to lower costs for, among other things:

- services provided by the Group by PLN 8,544 thousand,
- HR consultancy and recruitment costs by PLN 4,966 thousand,
- mass mailing (distribution) by PLN 3,856 thousand.

while at the same time increasing costs for:

- other advisory services - an increase of PLN 4,541 thousand,
- third-party services in the leasing company - an increase of PLN 3,483 thousand,
- advisory services on CHF loans - an increase of PLN 2,705 thousand.

Total costs related to legal services for CHF loan litigation in 2024 amounted to PLN 116,829 thousand (PLN 91,046 thousand in 2023) and are included in the lines: Third-party services for other contracts and consultancy and Other non-personnel expenses (notary and court fees).

Table 30. Personnel expenses

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Payroll expenses	(1,242,123)	(1,131,252)	(110,871)	9.8%
Payroll charges	(222,583)	(202,778)	(19,805)	9.8%
Employee benefits	(61,562)	(55,074)	(6,488)	11.8%
Costs of restructuring provision	(649)	(31,305)	30,656	(97.9%)
Costs of provision for future liabilities arising from unused annual leave and retirement benefits	(6,207)	(6,990)	783	(11.2%)
Appropriations to Social Benefits Fund	(19,412)	(15,273)	(4,139)	27.1%
Other	(1,518)	(2,688)	1,170	(43.5%)
Total personnel expenses	(1,554,054)	(1,445,360)	(108,694)	7.5%

Depreciation and amortisation expenses in 2024 amounted to PLN 514,450 thousand and were higher compared to 2023 by PLN 57,714 thousand, i.e. by 12.6%. This increase was mainly due to the Bank's further transformation and digitalisation and the expenses incurred for this purpose as well as the acceleration of the depreciation of certain investment systems. Depreciation and amortisation costs in Group companies remained at comparable YoY levels.

The Bank's capital expenditure in 2024 amounted to PLN 442,757 thousand and was higher by PLN 6,821 thousand, or 1.6%, than in 2023. The increase mainly related to computer hardware and software and improvements to third-party fixed



assets. At the same time, expenditure on external staff costs decreased. The volume of capital expenditure is adapted to the Bank's current needs and capabilities. All projects are analysed from the point of view of rationality and impact on the financial and business situation of the Bank and the Group.

Statement of other comprehensive income

The Group's total income in 2024 amounted to PLN 2,384,177 thousand, an increase of PLN 788,599 thousand, or 49.4%, compared with 2023 (PLN 1,595,578 thousand).

The increase in the Group's total income was influenced by an increase in the realised net financial result, which at the end of 2024 was higher by PLN 1,345,722 thousand, or 132.9%, compared to the end of 2023.

The Group's total income was negatively impacted by:

- changes in the valuation of financial assets measured by other comprehensive income (PLN 43,787 thousand in 2024 vs. PLN 653,872 thousand in 2023). The change in valuation is primarily the result of changes in interest rate expectations and changes in the composition of the securities portfolio during the period;
- negative measurement of cash flow hedging derivatives (PLN -10,138 thousand in 2024 vs PLN 67,303 thousand in 2023).

Table 31. Statement of other comprehensive income

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2023	change YoY	
			PLN thousand	%
Net profit	2,358,268	1,012,546	1,345,722	132.9%
Other comprehensive income				
Items that may be reclassified subsequently to profit or loss upon fulfilment of certain conditions	27,255	584,151	(556,896)	(95.3%)
Measurement of financial assets measured at fair value through other comprehensive income, gross	43,787	653,872	(610,085)	(93.3%)
Deferred income tax on the valuation of gross financial assets measured through other comprehensive income	(8,320)	(124,236)	115,916	(93.3%)
Measurement of cash flow hedge accounting derivatives	(10,138)	67,303	(77,441)	-
Deferred income tax on the valuation of gross derivatives hedging cash flows	1,926	(12,788)	14,714	-
Items that will not be reclassified to profit or loss	(1,346)	(1,119)	(227)	20.3%
Actuary valuation of employee benefits	(1,662)	(1,382)	(280)	20.3%

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2023	change YoY	
			PLN thousand	%
Deferred income tax on actuarial valuation of gross personnel expenses	316	263	53	20.2%
Other comprehensive income (net)	25,909	583,032	(557,123)	(95.6%)
Total comprehensive income	2,384,177	1,595,578	788,599	49.4%

Statement of financial position

Assets

The Group's total assets as at the end of 2024 amounted to PLN 167,539,589 thousand, an increase of PLN 6,513,842 thousand, or 4.0%, compared with the end of 2023.

The most significant change in the Group's asset structure compared to the end of 2023 was an increase in the share of the securities portfolio by 6.4%, the cash and balances at the Central Bank by 2.5%, and a decrease in the share of receivables from banks by 6.5% and the loan portfolio by 2.3%. (sum of portfolios measured at amortised cost and at fair value).

The Group's asset structure was dominated by loans and advances to Customers (the sum of portfolios measured at amortised cost and at fair value), which accounted for 51.2% of total assets at the end of 2024, compared to 53.6% at the end of 2023. Net loans and advances volumes remained at a similar level to the end of 2023, at PLN 85,854,022 thousand (PLN -394,076 thousand, or -0.5%). The Retail Customers' portfolio decreased by 4.5% compared to the end of 2023 (including mortgage loans down by 8.1%). The Institutional Customers' loan portfolio increased by 2.0% compared to year-end 2023 (mainly as a result of a 96.4% increase in the portfolio of loans and advances to non-banking financial entities).

The second largest asset item was securities, which accounted for 33.3% of total assets at the end of 2024 (end 2023: 26.8%). Their value increased by PLN 12,541,506 thousand (i.e. by 29.1%) compared to the end of 2023. The largest increase (by PLN 6,393,151 thousand, i.e. 38.4%) was in the portfolio of securities measured at fair value through other comprehensive income (primarily in bonds issued by non-banking financial entities and the portfolio of NBP money bills). The portfolio of securities measured at amortised cost increased in the period under review by PLN 6,118,272 thousand, i.e. by 23.3% (mainly securities issued by non-banking financial entities and Treasury bonds).

The share of the cash and funds item of the Central Bank (the third largest asset item) was 6.8% (end 2023: 4.3%). Its value increased compared to the end of 2023 by PLN 4,441,965 thousand (i.e. by 64.5%) and amounted to PLN 11,325,551 thousand. The share of amounts due from banks decreased from 11.2% to 4.7% (in value by PLN 10,091,573 thousand, i.e. by 56.2%).



Table 32. Assets

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Cash and balances at the Central Bank	11,325,551	6,883,586	4,441,965	64.5%
Amounts due from banks	7,872,375	17,963,948	(10,091,573)	(56.2%)
Derivative financial instruments	2,440,116	3,146,745	(706,629)	(22.5%)
Differences from hedge accounting	230,658	94,496	136,162	144.1%
Loans and advances to Customers measured at amortised cost	85,401,516	85,594,516	(193,000)	(0.2%)
Loans and advances to Customers measured at fair value through profit or loss	452,506	653,582	(201,076)	(30.8%)
Securities measured at amortised cost	32,364,550	26,246,278	6,118,272	23.3%
Securities measured at fair value through profit or loss	321,434	291,351	30,083	10.3%
Securities measured at fair value through other comprehensive income	23,027,454	16,634,303	6,393,151	38.4%
Intangible assets	975,114	936,024	39,090	4.2%
Property, plant and equipment	946,971	959,923	(12,952)	(1.3%)
Deferred tax assets	859,567	766,504	93,063	12.1%
Current tax assets	1,515	4,730	(3,215)	(68.0%)
Other assets	1,320,262	849,761	470,501	55.4%
Total assets	167,539,589	161,025,747	6,513,842	4.0%

Loan portfolio

Loan portfolio structure

At the end of 2024, gross loans and advances to Customers (the sum of portfolios measured at amortised cost and measured at fair value) amounted to PLN 88,387,255 thousand and remained at a level similar to the end of 2023 (a slight decrease of PLN 469,791 thousand, or 0.5%)

The gross portfolio of loans and advances measured at amortised cost in the period under review amounted to PLN 87,859,760 thousand (PLN -252,073 thousand, i.e. -0.3% YoY).

Table 33. Structure of the loan portfolio measured at amortised cost

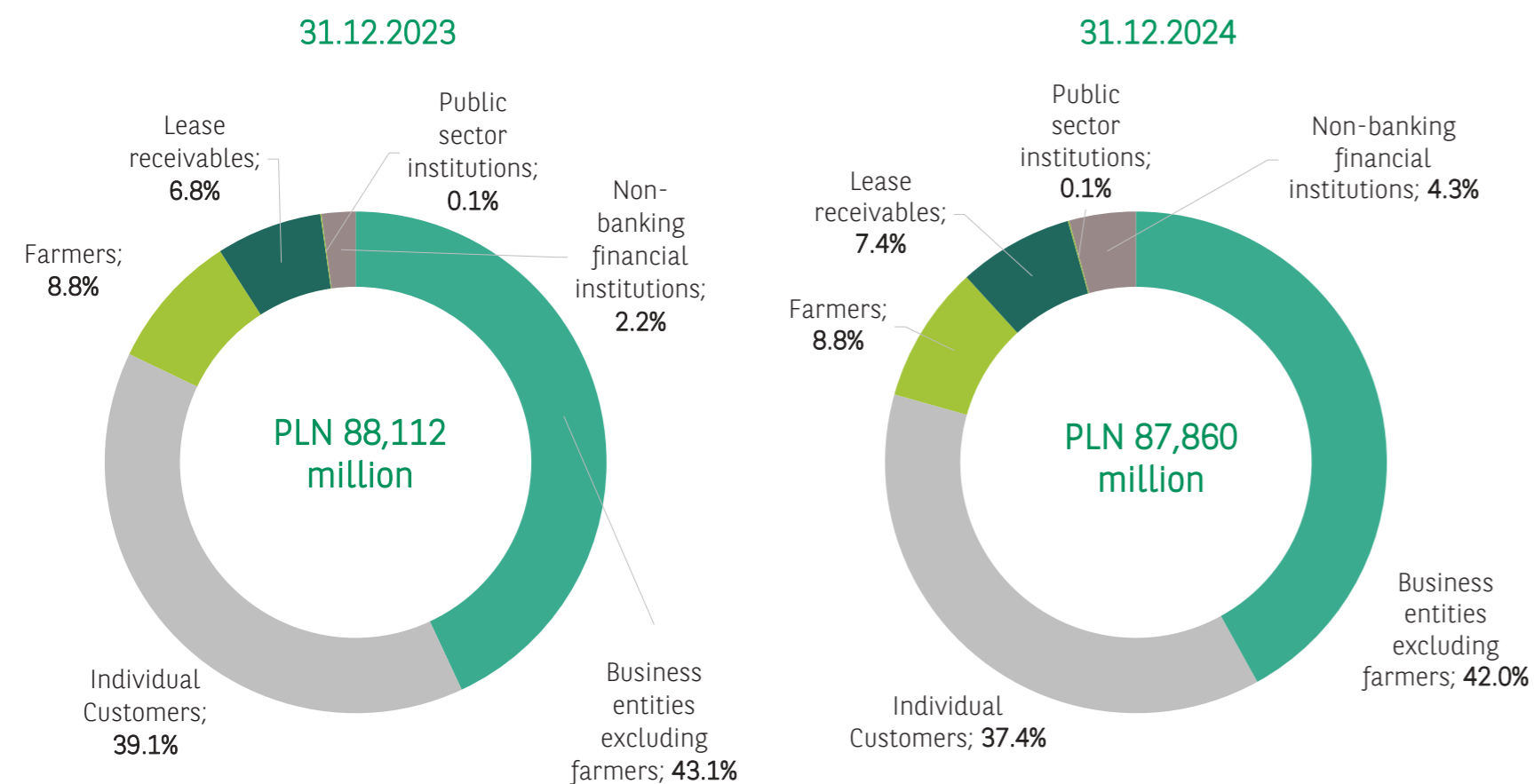
PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Corporate Customers excluding farmers	36,874,775	37,934,568	(1,059,793)	(2.8%)
Farmers	7,769,080	7,765,713	3,367	0.0%
Retail Customers	32,858,093	34,410,687	(1,552,594)	(4.5%)
- mortgage loans	20,207,062	21,986,449	(1,779,387)	(8.1%)
PLN	19,779,708	21,146,369	(1,366,661)	(6.5%)
Currency	427,354	840,080	(412,726)	(49.1%)
- cash loans	8,487,233	8,217,733	269,500	3.3%
- other retail loans	4,163,798	4,206,505	(42,707)	(1.0%)
Leasing receivables	6,519,624	6,023,019	496,605	8.2%
Public sector institutions	67,960	58,375	9,585	16.4%
Non-bank financial institutions	3,770,228	1,919,471	1,850,757	96.4%
Gross loans and advances	87,859,760	88,111,833	(252,073)	(0.3%)

The gross portfolio of loans and advances to corporate Customers (excluding farmers) amounted to PLN 36,874,775 thousand (down by PLN 1,059,793 thousand, or 2.8%, compared with the end of 2023). Their share in the analysed loan portfolio at the end of 2024 was 42.0% (-1.1 p.p. compared to the end of 2023). Current account loans 39.5% of this portfolio (-2.6 p.p. vs. 2023)

Gross loans and advances to retail Customers at the end of 2024 amounted to PLN 32,858,093 thousand (down by PLN 1,552,594 thousand, or 4.5%, compared with the end of 2023). Their share in the loan portfolio measured at amortised cost in the period under review was 37.4% (down 1.7 p.p. compared to the end of 2023). Mortgage loans, which amounted to PLN 20,207,062 thousand at the end of 2024, accounted for 61.5% of the credit exposure of retail Customers. In the structure of housing loans, 97.9% were loans granted in PLN, while 2.1% were loans granted in CHF (compared with the end of last year, the share of CHF fell by 1.7 p.p).



Chart 16. Loans and advances gross measured at amortised cost – entity structure



The volume of loans granted to individual farmers at the end of 2024 amounted to PLN 7,769,080 thousand and remained unchanged compared to December 2023.

Lease receivables amounted to PLN 6,519,624 thousand (up 8.2% compared to year-end 2023). Their share in the loan portfolio measured at amortised cost in the period under review was 7.4% (compared with 6.8% at year-end 2023).

The volume of loans granted to non-banking financial entities and public sector institutions totalled PLN 3,838,188 thousand (up 94.1% compared with the end of 2023). Their share in the loan portfolio measured at amortised cost in 2024 was 4.4% (compared with 2.2% at the end of 2023).

Quality of the loan portfolio

The ratio of Stage 3 qualifying exposures and POCI non-performing to gross loans and advances to Customers measured at amortised cost increased slightly compared to the end of 2023 and stood at 3.2% at the end of December 2024. The provision coverage of these exposures at the end of December 2024 was 54.0%, down 5.9 p.p. compared to the end of 2023.

Table 34. Coverage of the loan portfolio measured at amortised cost with impairment losses

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Gross loans and advances to Customers, total	87,859,760	88,111,833	(252,073)	(0.3%)
Allowance for receivables	(2,458,244)	(2,517,317)	59,073	(2.3%)
Net loans and advances to Customers, total	85,401,516	85,594,516	(193,000)	(0.2%)
Gross loans and advances granted to Customers in Stage 1 & 2, and POCI performing				
Gross balance sheet exposure	85,012,162	85,471,034	(458,872)	(0.5%)
Allowance	(921,184)	(935,751)	14,567	(1.6%)
Net balance sheet exposure	84,090,978	84,535,283	(444,305)	(0.5%)
Gross loans and advances granted to Customers in Stage 3, and POCI non-performing				
Gross balance sheet exposure	2,847,598	2,640,799	206,799	7.8%
Impairment allowance	(1,537,060)	(1,581,566)	44,506	(2.8%)
Net balance sheet exposure	1,310,538	1,059,233	251,305	23.7%

Indicators	31.12.2024	31.12.2023	change
Share of Stage 3 and POCI non-performing in the gross portfolio	3.2%	3.0%	0,2 p.p.
Provision coverage of Stage 3 and POCI non-performing exposures	54.0%	59.9%	(5,9 p.p.)

**Table 35. Quality of the loan portfolio measured at amortised cost**

PLN thousand	31.12.2024			31.12.2023		
	total gross	NPL*	share %	total gross	NPL*	share %
Corporate Customers excluding farmers	36,874,775	1,529,666	4.1%	37,934,568	1,210,104	3.2%
Farmers	7,769,080	405,438	5.2%	7,765,713	478,658	6.2%
Retail Customers	32,858,093	715,412	2.2%	34,410,687	780,946	2.3%
- mortgage loans	20,207,062	288,465	1.4%	21,986,449	313,433	1.4%
PLN	19,779,708	172,862	0.9%	21,146,369	171,090	0.8%
currency	427,354	115,603	27.1%	840,080	142,343	16.9%
- cash loans	8,487,233	320,712	3.8%	8,217,733	361,676	4.4%
- other retail loans	4,163,798	106,235	2.6%	4,206,505	105,837	2.5%
Leasing receivables	6,519,624	187,807	2.9%	6,023,019	157,463	2.6%
Public sector institutions	67,960	-	-	58,375	31	0.1%
Non-banking financial entities	3,770,228	9,275	0.2%	1,919,471	13,597	0.7%
Gross loans and advances	87,859,760	2,847,598	3.2%	88,111,833	2,640,799	3.0%

* NPLs - a category defined as loans and advances in Stage 3 and POCI non-performing based on information presented in the note 21 to the Consolidated Financial Statements

The value of collateral held for Customer loans at the end of 2024 amounted to PLN 1,792,387 thousand (PLN 1,677,590 thousand at the end of 2023). Details of collateral held are included in Note 54.2. of the Consolidated Financial Statements for the year ended 31 December 2024.

Securitisation of the loan portfolio

On 28 March 2024 the Bank entered into an agreement with International Finance Corporation ("IFC", "Investor") for a synthetic securitisation transaction executed on a portfolio of corporate loans/advances with a total value of PLN 2,180,097 thousand as at 31 December 2023. The main objective of the transaction is to release the capital that the Bank will allocate to finance climate projects (projects related to climate change mitigation, focusing mainly on renewable energy sources, energy efficiency and financing green projects).

As part of the transaction, the Bank transferred a significant part of the credit risk from the selected securitised portfolio to the Investor. The selected loan portfolio covered by the securitisation remains in the Bank's books.

As at 31 December 2024, the value of the portfolio of transactions included in the balance sheet and off-balance sheet amounted to PLN 876,049 thousand.

The transaction completion date under the agreement is 31 December 2031.

The risk transfer of the securitised portfolio is effected through a credit protection instrument in the form of a financial guarantee issued by the Investor for up to PLN 86,288 thousand as at 31 December 2024. Costs on account of this guarantee are presented in Commission expenses - Guarantees and documentary operations.

As at 31 December 2024, the conclusion of the Transaction increases the consolidated Common Equity Tier 1 (CET1) ratio by 0.08 p.p. and the consolidated total capital adequacy ratio (TCR) by 0.11 p.p. in relation to the reported data of the BNP Paribas Bank Polska Group.

The transaction meets the requirements for significant risk transfer set out in the CRR Regulation and has been structured as meeting the STS criteria (simple, transparent and standardised securitisation) in accordance with Regulation 2021/557.

The Bank acted as the arranger of the Transaction.

Liabilities and equity

As at the end of December 2024, the Group's total liabilities amounted to PLN 152,145,533 thousand and were PLN 3,981,061 thousand, or 2.7%, higher than at the end of 2023. The share of liabilities in the Group's total liabilities and equity was 90.8% in the period under review (compared with 92.0% at the end of 2023).

The structure of liabilities is dominated by amounts due to Customers. Their share at the end of December 2024 was 86.1% and increased by 0.2 p.p. compared to the end of 2023. In value terms, the volume of these liabilities increased by PLN 3,749,923 thousand, i.e. by 2.9% compared to December 2023, and amounted to PLN 130,924,754 thousand.

The Group's equity as at the end of December 2024 amounted to PLN 15,394,056 thousand and increased by 19.7%, or PLN 2,532,781 thousand, compared to 31 December 2023. The share of total equity in the Group's total liabilities and equity was 9.2% at the end of December 2024 (compared with 8.0% at the end of 2023).

Table 36. Liabilities and Equity

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Amounts due to the Central Bank	-	-	-	-
Amounts due to other banks	9,994,802	9,059,394	935,408	10.3%
Derivative financial instruments	2,311,741	2,865,275	(553,534)	(19.3%)
Differences from hedge accounting	260,025	(7,365)	267,390	-
Amounts due to Customers	130,924,754	127,174,831	3,749,923	2.9%
Debt securities issued	-	-	-	-



PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Subordinated liabilities	3,420,128	4,336,072	(915,944)	(21.1%)
Leasing liabilities	606,306	626,269	(19,963)	(3.2%)
Other liabilities	2,296,756	2,191,890	104,866	4.8%
Current tax liabilities	361,641	376,736	(15,095)	(4.0%)
Provisions	1,969,380	1,541,370	428,010	27.8%
Total liabilities	152,145,533	148,164,472	3,981,061	2.7%
Share capital	147,800	147,677	123	0.1%
Supplementary capital	9,155,136	9,110,976	44,160	0.5%
Other reserve capital	4,042,815	3,525,056	517,759	14.7%
AT1 Capital bonds	650,000	-	650,000	-
Revaluation reserve	(540,845)	(566,754)	25,909	(4.6%)
Retained earnings	1,939,150	644,320	1,294,830	201.0%
- retained profit	(419,118)	(368,226)	(50,892)	13.8%
- net profit for the period	2,358,268	1,012,546	1,345,722	132.9%
Total equity	15,394,056	12,861,275	2,532,781	19.7%
Total liabilities and equity	167,539,589	161,025,747	6,513,842	4.0%

Amounts due to Customers

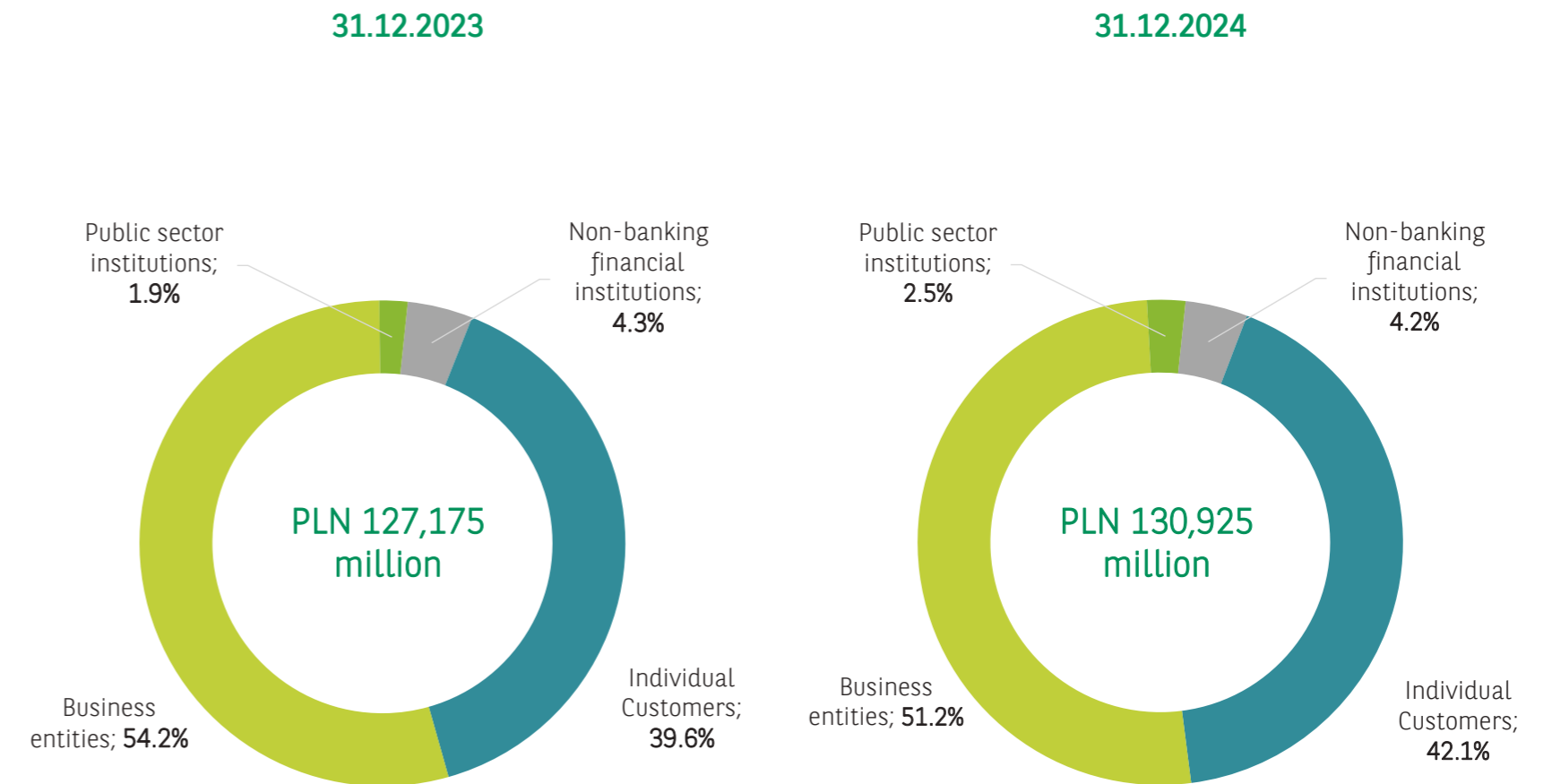
At the end of 2024, amounts due to Customers amounted to PLN 130,924,754 thousand and were higher by PLN 3,749,923 thousand, or 2.9%, compared with the end of 2023.

In terms of entities, the increase mainly concerned the volumes of individual Customers (as at 31 December 2024, the balance was PLN 55,184,397 thousand), whose volumes increased by PLN 4,829,127 thousand, i.e. by 9.6%, compared with the balance at the end of 2023, mainly as a result of an increase in current accounts (by PLN 3,994,431 thousand). Term deposits increased by PLN 830,239 thousand, or 3.4%. The share of this segment in the structure of total amounts due to Customers amounted to 42.1% against 39.6% at the end of December 2023. At the same time, the volumes of liabilities to institutions of the public sector increased (by PLN 948,758 thousand, i.e. by 39.7%).

The increase in the volumes of individual Customers was partially neutralised by a decrease in liabilities to businesses (balance as at 31 December 2024 amounted to PLN 66,970,279 thousand), whose volume decreased by PLN 1,932,201 thousand, i.e. 2.8%, compared with the balance as at the end of 2023, as a result of a decrease in current accounts (by PLN 2,858,197 thousand). Term deposits increased by PLN 898,291 thousand, i.e. by 6.3%, compared to the balance at the end of 2023. The share of this segment in the structure of total amounts due to Customers was 51.2% compared to 54.2% at the end of December 2023.

Deposit volumes of other financial institutions remained almost unchanged compared to the end of 2023 (down by PLN 95,761 thousand, or 1.7%).

Graph 17. Amounts due to Customers - entity structure



**Table 37. Amounts due to Customers by product**

	31.12.2024		31.12.2023	
	PLN thousand	share %	PLN thousand	share %
Current accounts	86,301,533	65,9%	84,597,912	66.5%
Term deposits	43,070,184	32,9%	41,053,999	32.3%
Loans and advances received	449,955	0,4%	460,893	0.4%
Other liabilities	1,103,082	0,8%	1,062,027	0.8%
Amounts due to Customers, including	130,924,754	100,0%	127,174,831	100.0%
Deposits	130,474,799	99,7%	126,713,938	99.6%

The share of current accounts in the structure of total amounts due to Customers stood at the end of December 2024. 65.9%, registering a decrease of 0.6 p.p. compared to the end of 2023. Funds deposited in current accounts amounted to PLN 86,301,533 thousand and increased by PLN 1,703,621 thousand, or 2.0%. This increase was driven by an increase in the volume of individual Customers (by PLN 3,994,431 thousand, i.e. by 15.5%), partially offset by a decrease in the volume of businesses (by PLN 2,858,197 thousand, i.e. by 5.3%).

The share of time deposits in the structure of amounts due to Customers in the analysed period amounted to 32.9% and increased by 0.6 p.p. compared to the end of 2023. In value terms, time deposits increased by PLN 2,016,185 thousand to PLN 43,070,184 thousand, up 4.9% compared with December 2023.

The share of other liabilities and loans and advances received in total in the structure of amounts due to Customers amounted to 1.2% and remained unchanged compared to the end of 2023. Their total volume amounted to PLN 1,553,037 thousand.

The territorial structure of amounts due to the Bank's Customers at the end of 2024 by major region, in management terms, is shown below.

Table 38. Territorial structure of amounts due to the Bank's Customers at the end of 2024.

Segment/market	31.12.2024
Retail and Business Banking	54.8%
Białystok	2.8%
Bydgoszcz	2.7%
Gdańsk	3.5%

Segment/market	31.12.2024
Katowice	2.9%
Kielce	3.2%
Kraków	4.3%
Lublin	3.3%
Łódź	3.3%
Olsztyn	2.7%
Poznań	4.2%
Rzeszów	2.9%
Szczecin	2.5%
Warszawa South	3.2%
Warszawa North	6.9%
Wrocław	3.8%
Zielona Góra	2.6%
SME and Corporate Banking	38.5%
East	8.5%
West	7.4%
Strategic Customers Division	22.5%
Other	6.7%

Equity

As at 31 December 2024, the Group's equity amounted to PLN 15,394,056 thousand, which was PLN 2,532,781 thousand, or 19.7%, higher than at the end of 2023.

The change in the value of the Group's equity was mainly influenced by the increase in the current period's result (net profit 2024 amounted to PLN 2,358,268 thousand and was higher by PLN 1,345,722 thousand, i.e. by 132.9% compared to 2023).



The increase in other reserves was mainly due to the distribution of profit realised in 2023. Pursuant to Resolution No. 7 of the Bank's Annual General Meeting of 16 April 2024, of the Bank's profit after tax for 2023 (PLN 1,007,828 thousand), PLN 503,998 thousand was allocated to dividends and the remainder of PLN 503,830 thousand to reserves.

In addition, in Q4 2024, the Bank issued the Capital Bonds referred to in Article 27a of the Bond Act of 15 January 2015, which were acquired by BNP Paribas SA, Paris, on 28 November 2024. The total nominal value of the Capital Bond issue, presented within equity in the Perpetual Bonds line, amounted to PLN 650,000 thousand.

On 2 January 2025, the Bank received a decision from the Polish Financial Supervision Authority dated 31 December 2024 to approve the qualification of Series A capital bonds totalling PLN 650,000 thousand as additional instruments in Tier 1 capital.

Contingent liabilities

The table below presents the value of liabilities granted and received.

Table 39. Contingent liabilities

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Contingent commitments granted	36,666,533	50,888,418	(14,221,885)	(27.9%)
financial commitments	23,269,197	34,470,777	(11,201,580)	(32.5%)
guarantees	13,397,336	16,417,641	(3,020,305)	(18.4%)
Contingent commitments received	55,172,867	57,137,307	(1,964,440)	(3.4%)
financial commitments	551,870	8,176,478	(7,624,608)	(93.3%)
guarantees	54,620,997	48,960,829	5,660,168	11.6%

The amount of non-current liabilities granted at the end of 2024 was PLN 18,152,339 thousand compared to PLN 20,996,915 thousand at the end of 2023), while non-current liabilities received were, respectively: PLN 49,217,162 thousand and PLN 50,724,039 thousand.

Own funds and capital ratios

The calculation of the capital adequacy of the Bank and the Group as at 31 December 2024 was made in accordance with the provisions of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 (CRR) on prudential requirements for credit institutions and investment firms, as amended by Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 (CRR2).

The Group's own funds at 31 December 2024 consisted of:

- Common Equity Tier 1 capital of PLN 12,162,053 thousand against PLN 11,214,650 thousand at the end of 2023,
- Tier 1 capital of PLN 12,812,053 thousand against PLN 11,214,650 thousand at the end of 2023,
- Tier II capital of PLN 3,150,021 thousand against PLN 3,722,878 thousand at the end of 2023.

Key factors that affected the level of own funds in 2024:

- inclusion in the consolidated Common Equity Tier 1 capital of the revised consolidated net profit generated in the period from 1 January 2023 to 31 December 2023 in the amount of PLN 514,262 thousand (as a consequence of the decision of the Bank's Annual General Meeting of 16 April 2024 on the distribution of the profit of BNP Paribas Bank Polska S.A. for the financial year 2023);
- the issue of capital bonds totalling PLN 650 million as Additional Tier 1 (AT1) capital instruments;
- an improvement in the result from unrealised gains and losses at fair value through other comprehensive income by PLN 412,832 thousand, i.a. due to the introduction of the so-called "provisional treatment period" lasting from 30.11.2024 to 31.12.2025 (CRR Article 468);
- reduction of the adjustment by PLN 4 264 thousand in Common Equity Tier 1 capital related to the deduction of intangible assets, taking into account the Commission Delegated Regulation (EU) 2020/2176 of 12 November 2020 with regard to the deduction of software assets from Common Equity Tier 1 capital items;
- reduction of own funds by a deduction in accordance with Article 36(1)(k) of the CRR Regulation in the amount of PLN 18,735 thousand; the adjustment is created for securitisation positions eligible for a risk weight of 1,250% in accordance with Article 245(1)(b) and Article 253 of the CRR Regulation;
- a decrease in the amortisation of Tier 2 instruments by PLN 331,298 thousand mainly due to the prepayment of three subordinated loans of PLN 440 million, EUR 40 million and EUR 60 million.

Total risk exposures as at 31 December 2024 amounted to PLN 92,814,926 thousand, an increase of PLN 3,199,809 thousand compared to the end of 2023. The increase in total risk-weighted assets for credit risk and total risk-weighted assets for operational risk were the greatest contributors to this change.

As a result of the above changes, the Group's capital ratios have improved. The Group's total capital ratio as at 31 December 2024 was 17.20%, an increase of 0.53 p.p. compared to the end of 2023. The Group's consolidated common equity tier 1 (CET I) capital ratio as at 31 December 2024 was 13.10% (up 0.59 p.p. compared with the end of 2023) and the Group's consolidated tier 1 capital ratio as at 31 December 2024 was 13.80% (up 1.29 p.p. compared with the end of 2023).



Table 40. Own funds and capital ratios of the Group

PLN thousand	31.12.2024	31.12.2023	change YoY	
			PLN thousand	%
Share capital (CET I)				
- share capital	147,800	147,677	123	0.1%
- supplementary capital	7,259,316	7,259,316	0	0.0%
- reserve capital	5,198,711	4,699,563	499,148	10.6%
- general banking risk fund	627,154	627,154	0	0.0%
- intangibles assets	(490,732)	(498,045)	7,313	(1.5%)
- other components of own funds, included in the calculation of basic capital (CET 1)	(580,196)	(1,021,015)	440,819	(43.2%)
Total share capital (CET I)	12,162,053	11,214,650	947,403	8.4%
Additional Tier 1 capital	650,000	-	650,000	-
Total Tier 1 capital	12,812,053	11,214,650	1,597,403	14.2%
Supplementary funds (Tier II)				
- subordinated liabilities included in own funds	3,150,021	3,722,878	(572,857)	(15.4%)
Total own funds	15,962,074	14,937,528	1,024,546	6.9%
Risk exposure amount due to				
- credit risk	80,634,295	78,760,653	1,873,642	2.4%
- market risks	1,338,766	1,470,850	(132,084)	(9.0%)
- operational risks	10,791,753	9,346,897	1,444,856	15.5%
- credit valuation adjustments	50,112	36,717	13,395	36.5%
Total risk exposure amount	92,814,926	89,615,117	3,199,809	3.6%

Capital ratios of the Group	31.12.2024	31.12.2023	change
Common Equity Tier I (CET I) Ratio	13.10%	12.51%	+0.59 p.p.
Tier I Capital Ratio	13.80%	12.51%	+1.29 p.p.
Total Capital Ratio (TCR)	17.20%	16.67%	+0.53 p.p.

Minimum capital requirements

The minimum levels of capital adequacy ratios of the Bank and the Group result from the following external regulations:

- Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013: 4.5% for CET1, 6% for Tier 1 and 8% for TCR,
- The Act of 5 August 2015 on macroprudential supervision over the financial system and crisis management in the financial sector (Journal of Laws of 2015, item 1513, as amended):
 - conservation buffer of 2.5% (unchanged compared to 2023),
 - buffer of another systemically important institution of an amount equivalent to 0.50% of the total risk exposure amount calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013. On 16 September 2024, the Bank received for information a request from the Polish Financial Supervision Authority regarding the expression of an opinion by the Financial Stability Committee on the amendment of the Commission's decision of 4 October 2016, as amended by the Commission's decision of 19 December 2017 on the imposition on the Bank (on a consolidated and individual basis) of a buffer of another systemically important institution of an amount equivalent to 0.25% of the total risk exposure amount. By its decision of 6 December 2024, the FSC amended the decision of 4 October 2016 imposing on the Bank a buffer of another systemically important institution in an amount equivalent to 0.50% of the total risk exposure amount,
 - countercyclical buffer rate - the Bank-specific countercyclical buffer rate, determined in accordance with the provisions of the Act of August 5, 2015, on macroprudential supervision over the financial system and crisis management in the financial system as a weighted average of the countercyclical buffer rates applicable in the jurisdictions where the Bank's relevant credit exposures are located, was 0 bps. at 31 December 2024. The value of the indicator was influenced by the application of Article 2(5)(b) of Commission Delegated Regulation (EU) No 1152/2024, according to which foreign general credit exposures which together do not exceed 2% of the total general credit exposures, trading portfolio exposures and securitisation exposures of that institution, may be allocated to the member state of the institution's origin. The countercyclical buffer rate for credit exposures in the territory of the Republic of Poland, which applied at the end of December 31, 2024, was 0%.
- Act of 29 August 1997 - Banking Act (Dz.U. 1997 No. 140 item 939): capital charge recommended under Pillar II (P2G) - The FSC, by letter dated, 16 December 2024, reported that the Bank's sensitivity to the possible materialisation of stress scenarios affecting the level of own funds and risk exposure was assessed as low in the Bank's supervisory assessment process. Based on the 2024 Supervisory Stress Tests conducted by the Office of the Financial Supervision Authority and in accordance with the instruction, the total capital charge recommended under Pillar II offset by a capital buffer requirement of 0.00 p.p. on an individual basis and 0.00 p.p. on a consolidated basis was determined.



As a result of the requirements described above, the minimum levels of capital adequacy ratios resulting from the provisions of law and administrative decisions issued by the PFSA on a consolidated basis are:

Minimum levels of the Group's capital ratios	31.12.2024	31.12.2023	change
Common Equity Tier 1 Capital Ratio (CET I)	7.50%	7.93%	(0.43) p.p.
Tier 1 Capital Ratio	9.00%	9.43%	(0.43) p.p.
Total Capital Ratio (TCR)	11.00%	11.43%	(0.43) p.p.

At the end of December 2024, all capital adequacy ratios of the Group were higher than the minimum requirements by:

- 5.60 p.p. for the Common Equity Tier 1 Capital Ratio,
- 4.80 p.p. for the Tier 1 Capital Ratio,
- 6.20 p.p. for the Total Capital Ratio.

Capital position management

The Bank continuously monitors and manages its capital position, including the level of subordinate liabilities included in own funds, taking into account current needs and the degree of amortization of individual subordinated debts.

On 16 September 2024, the Bank communicated to BNP Paribas S.A (the lender) that it had exercised its right to exercise its option for early repayment of loans classified as Tier 2 capital in the amounts of PLN 440 million and EUR 40 million raised under separate agreements on 29 December 2015. As at 30 September 2024, the prudential amortisation of both loans would amount to PLN 456 million (i.e. 75% of their nominal value). These loans ceased to be recognised as part of Tier 2 capital from the time of the early repayment information, and were subsequently repaid on 7 October 2024. The Bank had previously obtained approvals from the Polish Financial Supervision Authority to perform the repayments of the indicated loans. As at 30 September this year, the execution of the repayments of the indicated loans had the effect of decreasing the TCR on a consolidated basis by 17 bps. (reduction of Tier 2 capital by PLN 155 million).

On 30 November 2024, the Bank notified BNP Paribas Succursale de Luxembourg (the lender) that it had made an early repayment of the Tier II loan of EUR 60 million raised under the agreement on 22 November 2016. This loan was repaid on 22nd November 2024 following prior approval by the Polish Financial Supervision Authority. As with the two loans described above, the impact of the repayment on the TCR was not material.

By a decision dated 31 December 2024, the Polish Financial Supervision Authority approved the Bank's classification of capital instruments constituting series A capital bonds with ISIN code PLO164300017, in the number of 1,300 (in words: one thousand three hundred) units, with a nominal value of PLN 500,000 each, and with a total value of PLN 650,000,000, as Additional Tier 1 (AT1) capital instruments. The Capital Bonds issued by the Bank on 28 November 2024 are instruments without a fixed maturity date, entitling the Bank to receive interest for an indefinite period of time, subject to the Bank

being able to redeem them early under the terms and conditions of the issue. The Capital Bonds were acquired exclusively by BNP Paribas S.A., Paris.

Minimum level of own funds and eligible liabilities (MREL) requirement

The MREL requirement applies at an individual level, hence the details of this requirement are described in the Bank's Financial Performance section.

Financial ratios

The Group's return on equity (ROE), calculated on a reported basis, stood at 16.9% at the end of 2024 and was 8.7 p.p. higher than in 2023. Return on assets (ROA) calculated in a similar manner was 1.5%, up 0.8 p.p. compared with 2023. The improvement in the return ratios was mainly due to the increase in the result from banking activities and the lower negative impact of legal risk related to foreign currency housing loans.

The Group's return on equity (ROE) calculated excluding the impact of credit holidays (normalised) would be in 2024 17.3% and would be 9.5 p.p. higher compared to the ratio for 2023 (7.7%). For return on assets (ROA), the ratio would be 1.5%, 0.9 p.p. higher than for 2023.

The cost/income ratio calculated on the basis of reported volumes was 43.2% (a level 0.7 p.p. higher than in 2023). This change was the result of an apparent increase in the cost base in 2024 due to the impact of inflationary processes and ongoing investments as well as slightly higher regulatory costs.

The net interest margin calculated in relation to average assets was 3.6% (an increase of 0.1 p.p. compared to 2023). Excluding the impact of credit holidays, the net interest margin would also have been 3.6% (up 0.2 p.p. compared to 2023).

The level and evolution of ratios representing the ratio of net and gross loans to deposits and sources of funding reflect the good liquidity situation observed in 2024 and 2023.

Table 41. Financial ratios*

	31.12.2024	31.12.2023	31.12.2022	change 2024/2023
Return on capital	16.9%	8.2%	3.9%	+8.7 p.p.
Normalized return on capital	17.3%	7.7%	10.2%	+9.5 p.p.
Return on assets	1.5%	0.7%	0.3%	+0.8 p.p.
Normalized return on assets	1.5%	0.6%	0.8%	+0.9 p.p.
Net interest margin	3.6%	3.4%	2.5%	+0.1 p.p.
Cost/Income	43.2%	42.5%	56.8%	+0.7 p.p.



	31.12.2024	31.12.2023	31.12.2022	change 2024/2023
Cost/Income excluding the Bank Guarantee Fund, SOBK, integration costs and the impact of credit moratoria	41.0%	41.1%	42.9%	(0.1 p.p.)
Credit risk costs	(0.28%)	(0.04%)	(0.30%)	(0.24 p.p.)
Normalised credit risk costs	(0.35%)	(0.07%)	(0.34%)	(0.28 p.p.)
Net loans/Deposits	65.8%	68.1%	74.2%	(2.3 p.p.)
Gross loans/Total sources of financing	62.0%	64.0%	70.2%	(2.0 p.p.)

* ratios calculated for 2022 on a comparable basis, i.e. taking into account changes in accounting policies related to the recognition of the impact of legal risk arising from CHF mortgage litigation (transition to IFRS 9) Due to rounding of values in the column, the changes may differ from the difference of columns for 2024 and 2023.



Alternative Performance Measurements

The presented ratios and categories belong to the group of standard and commonly used in financial analysis. They allow for the assessment and comparison of the Group's profitability and financial situation. The presentation of the level of net profit and ratios on a normalised basis, i.e. calculated excluding the impact of unusual events, is intended to provide additional information allowing for a more adequate assessment of changes in the long term and for assessing the impact of various factors on the Group's results and financial position.

Table 42. Alternative Performance Measurements

PLN thousand / %	31.12.2024	31.12.2023	31.12.2022	Definitions and assumptions
Net profit	2,358,268	1,012,546	441,497	Income statement category from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group for the relevant years
Total average equity	13,931,570	12,370,956	11,184,493	Average calculated on the basis of balances at the end of the last 3 quarters for the half year and the last 5 quarters for the full year (category of the statement of financial position from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group)
Return on capital	16.9%	8.2%	3.9%	Total net profit to average equity ratio
Net profit normalized	2,414,542	967,411	1,166,447	Category of the consolidated income statement adjusted for the negative impact of credit moratoria (2024: PLN 69,474 thousand, 2023: PLN +55,722 thousand, 2022: PLN -895 thousand; see chapter Consolidated statement of profit or loss). Impact of credit moratoria on net profit estimated using the 19% income tax rate
Total average equity normalised	13,983,442	12,496,227	11,485,813	Average total equity adjusted as well as net profit normalized, adjustments made for each quarter
Normalized return on capital	17.3%	7.7%	10.2%	Ratio of net profit normalized to average equity total normalized
Total average assets	161,180,334	152,411,341	141,720,477	Average calculated on the basis of balances at the end of the last 3 quarters for the half year and the last 5 quarters for the full year (category of the statement of financial position from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group)
Return on assets	1.5%	0.7%	0.3%	Ratio of net profit to average total assets
Average assets normalized	161,232,207	152,536,612	142,021,797	Total average assets adjusted as well as net profit normalized, adjustments made for each quarter
Normalized return on assets	1.5%	0.6%	0.8%	Ratio of net profit normalized to average assets total normalized
Net interest income	5,741,006	5,225,427	3,493,005	Category of the income statement from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group for the relevant periods
Net interest margin	3.6%	3.4%	2.5%	Ratio of net interest income to average total assets
Costs	3,351,809	3,095,535	3,038,456	Sum of general administrative costs and depreciation and amortisation (categories of P&L from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group)
Net banking income	7,752,716	7,282,798	5,351,946	Sum of net interest income, net fee and commission income, dividend income, net trading income, result on investment activities, result on hedge accounting, result on derecognition of assets/liabilities, other operating income and expenses (P&L categories from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group)
Cost/Income	43.2%	42.5%	56.8%	Cost-to-income ratio
Cost/Income excluding the Bank Guarantee Fund, SOBK, integration costs and the impact of credit moratoria	41.0%	41.1%	42.9%	The costs were adjusted by the costs of fees for the Bank Guarantee Fund and the Commercial Bank Protection Scheme (see Note General Administrative costs from the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group). In 2024: PLN 143,992 thousand, 2023: PLN 124,184 thousand, 2022: PLN 358,871 thousand. Revenues in 2024 adjusted by PLN 69,474 thousand of the negative impact of credit moratoria, in 2023 by PLN 55,722 thousand of the positive impact of credit moratoria, in 2023 by PLN 895,000 thousand of the negative impact of credit moratoria; (see chapter Consolidated statement of profit or loss).



PLN thousand / %	31.12.2024	31.12.2023	31.12.2022	Definitions and assumptions
Net allowances on expected credit losses of financial assets and provisions for contingent liabilities	(246,192)	(34,369)	(275,010)	Category of the income statement from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group for the relevant periods
Average gross loans and advances to Customers measured at amortised cost	88,195,764	89,280,552	91,783,301	Average calculated on the basis of balances at the end of the last 3 quarters for the half year and the last 5 quarters for the full year (category from the note Loans and advances to Customers measured at amortised cost from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group)
Credit risk costs	(0.28%)	(0.04%)	(0.30%)	Relation of net allowances on expected credit losses of financial assets and provisions for contingent liabilities to the average gross loans and advances to Customers measured at amortised cost
Net allowances on expected credit losses of financial assets and provisions for contingent liabilities normalised	(305,458)	(60,885)	(309,054)	Net allowances on expected credit losses of financial assets and provisions for contingent liabilities adjusted for the impact of sales of receivables (2024: PLN +59,266 thousand, 2023: PLN +26,516 thousand, 2022: PLN +34,044 thousand)
Normalised credit risk costs	(0.35%)	(0.07%)	(0.34%)	Ratio of the result of allowances on expected credit losses of financial assets and provisions for normalised contingent liabilities to the average balance of gross loans and advances to Customers, measured at amortised cost
Net Credits	85,854,022	86,248,098	88,631,148	The sum of net loans and advances to Customers, measured at amortised cost and net loans and advances to Customers, measured at fair value through profit or loss – from the notes to the Consolidated Financial Statements of the BNP Paribas Bank Polska Group. Balances at the end of period
Deposits	130,474,799	126,713,938	119,529,220	Difference between Amounts due to Customers and loans received from non-bank financial entities – from the Note Amounts due to Customers from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group. Balances at the end of period
Net loans/Deposits	65.8%	68.1%	74.2%	Net loan-to-deposit ratio
Loans and advances granted to Customers Stage 3 and POCI non-performing	2,847,598	2,640,799	2,947,846	Categories from the note: Loans and advances to Customers measured at amortised cost from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group (Tables of Loans and advances granted to Customers broken down by Stages and segmentation of POCI loans and advances - gross presentation)
Gross loans and advances to Customers measured at amortised cost	87,859,760	88,111,833	90,659,622	Category from the note: Loans and advances to Customers measured at amortised cost from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group
Share of Stage 3 and POCI non-performing in the gross portfolio	3.2%	3.0%	3.3%	The ratio of Stage 3 loans and POCI non-performing to gross Loans and advances granted to Customers valued at amortized cost, at the end of the period
Impairment allowances (for Stage 3 receivables and POCI non-performing)	1,537,060	1,581,566	1,789,679	Categories from the note: Loans and advances to Customers measured at amortised cost from the Consolidated Financial Statements of the BNP Paribas Bank Polska Group (Tables of Loans and advances granted to Customers broken down by Stages and segmentation of POCI loans and advances)
Provision coverage of Stage 3 and POCI non-performing exposures	54.0%	59.9%	60.7%	The ratio of Impairment allowances (for Stage 3 receivables and POCI non-performing) to Loans and advances granted to Customers Stage 3 and POCI non-performing



Business segment performance

Retail and Business Banking area

Commercial volumes

As at 31 December 2024, deposits from Customers of the Retail and Business Banking segment on a consolidated basis amounted to PLN 72,692,439 thousand and were by PLN 6,537,883 thousand, i.e. by 9.9%, higher than at the end of 2023. The largest increase in terms of value concerned funds in savings accounts (by PLN 3,391,088 thousand, i.e. 36.2%) and current accounts (by PLN 2,275,728 thousand, i.e. 7.4%). Term deposits increased by PLN 735,019 thousand, or 2.9%, compared to the end of 2023.

The term structure of the deposit portfolio is dominated by current accounts, with a share of 45.2% at the end of 2024 (-1.0 p.p. compared to the end of 2023). The share of savings accounts increased by 3.4 p.p. to 17.5%, while the share of time deposits fell (by 2.5 p.p. to 36.5%).

The net loan portfolio of the Retail and Business Banking segment on a consolidated basis as at 31 December 2024 amounted to PLN 42,429,517 thousand, a decrease of PLN 1,814,318 thousand, (i.e. 4.1%), compared with the end of 2023. In value terms, the largest decrease was in housing loans by PLN 1,765,705 thousand, or 8.1%. Investment loans decreased by PLN 512,002 thousand, or 10.2%.

The decrease in net mortgage loans was mainly influenced by a reduction in sales of PLN loans as a consequence of the Bank adopting a more conservative and selective policy of granting mortgage loans and not joining the government's '2% Safe Credit' programme to support the purchase of the first home.

The volume of gross foreign currency mortgage loans (withdrawn from the offer in 2008-2009) in the analysed period amounted to PLN 427,354 thousand (PLN 840,080 thousand at the end of 2023). Loans granted in CHF accounted for 95.1% of this portfolio. The decrease in the value of the portfolio was a result of repayments, settlements with Customers and the strengthening of the PLN against the CHF (the exchange rate fell from 4.6828 at the end of 2023 to 4.5371 at the end of 2024). The value of the portfolio expressed in CHF decreased by 48.6% compared to the end of 2023. The share of these loans in the total loan portfolio measured at amortised gross cost decreased to 0.5% at the end of 2024 (from 0.9% at the end of 2023).

² Deposit and loan volumes of selected segments have been presented on the basis of data from management information systems, due to the availability of more detailed product information. In order to maintain comparability, data as at 31.12.2023 have been presented in accordance with the segmentation in force in 2024.

Table 43. Retail and Business Banking Deposits and Loans²

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Current accounts	32,888,379	30,612,650	2,275,728	7.4%
Savings accounts	12,747,192	9,356,104	3,391,088	36.2%
Term deposits	26,498,676	25,763,657	735,019	2.9%
Overnight	558,192	422,144	136,048	32.2%
Accounts and deposits	72,692,439	66,154,555	6,537,883	9.9%
Consumer loans	11,343,241	11,057,350	285,891	2.6%
Investment loans	4,502,604	5,014,606	(512,002)	(10.2%)
Overdrafts	3,935,296	3,612,918	322,378	8.9%
Mortgage loans	19,925,190	21,690,894	(1,765,705)	(8.1%)
Leasing receivables	1,894,859	1,993,169	(98,310)	(4.9%)
Credit cards	826,376	871,731	(45,354)	(5.2%)
Other loans	1,951	3,166	(1,215)	(38.4%)
Loans and advances (net)	42,429,517	44,243,835	(1,814,318)	(4.1%)

Profit before tax

In 2024, Retail and Business Banking segment generated a profit before tax of PLN 742,606 thousand (compared with a pre-tax loss of PLN 550,364 thousand in 2023), an increase of PLN 1,292,970 thousand YoY, primarily due to a lower negative result from legal risk related to foreign currency loans (by PLN 1,182,358 thousand, or 59.8%).

In 2024, the net banking income amounted to PLN 3,876,797 thousand and was by PLN 194,214 thousand, i.e. by 5.3%, higher than in 2023. Both net interest income and net fee and commission income increased on an annual basis, by PLN 209,246 thousand (i.e. by 7.1%) and by PLN 62,466 thousand (i.e. by 10.0%), respectively.

Deposit volumes do not include balances of certain credit institutions, which are treated as interbank deposits in management reporting, while in financial reporting they are included in Customer deposits; in addition, balances do not include accrued interest not due.



Net banking income accounted for 50.0% of the Group's result in the period under review. The Personal Finance area generated 22.7% of the net banking income of the Retail and Business Banking segment (down 0.4 p.p. YoY).

At the end of 2024, the Retail and Business Banking segment served 3,966.1 thousand Customers (private individuals and micro-enterprises).

Table 44. Profit before tax of the Retail and Business Banking segment³

PLN thousand	12 months ended	12 months ended	change	
	31.12.2024	31.12.2023	PLN thousand	%
Net interest income	3,165,168	2,955,922	209,246	7.1%
Net fee and commission income	684,142	621,676	62,466	10.0%
Net trading and other income	27,487	104,985	(77,498)	(73.8%)
Net banking income	3,876,797	3,682,583	194,214	5.3%
Net allowances on expected credit losses	(1,369)	(54,118)	52,749	(97.5%)
Result on legal risk related to foreign currency loans	(795,728)	(1,978,086)	1,182,358	(59.8%)
Operating expenses and depreciation and amortization	(1,232,443)	(1,195,304)	(37,139)	3.1%
Cost allocation	(919,912)	(833,499)	(86,413)	10.4%
Operating result	927,345	(378,424)	1,305,769	-
Tax on financial institutions	(184,739)	(171,940)	(12,799)	7.4%
Segment profit before tax	742,606	(550,364)	1,292,970	-

Bank guarantees

In 2024, the Bank issued 19 bank guarantees on the orders of Customers of the Retail and Business Banking Area for a total amount of PLN 2.0 million.

³ Data based on the segmentation note included in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024

Corporate Banking and Small and Medium-sized Enterprises

Commercial volumes

Corporate Banking

As at 31 December 2024, deposits from Corporate Banking Customers amounted to PLN 40,959,562 thousand and were PLN 2,074,991 thousand or 4.8% lower than at the end of 2023. In the structure of the portfolio, the share of term deposits increased (from 21.8% at the end of 2023 to 22.1% at the end of 2024), with a slight decrease in the share of current accounts (from 77.4% at the end of 2023 to 77.0% at the end of 2024).

The net loan portfolio of the Corporate Banking segment on a consolidated basis amounted to PLN 28,987,803 thousand at the end of 2024 PLN 28,987,803 thousand and increased by PLN 1,165,483 thousand, or 4.2%, compared with the end of 2023. The largest increase in value was in overdrafts (by PLN 983,256 thousand) and investment loans (by PLN 124,603 thousand).

Table 45. Corporate Banking Deposits and Loans⁴

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Current accounts	31,522,313	33,288,556	(1,766,243)	(5.3%)
Savings accounts	2,416	7,044	(4,627)	(65.7%)
Term deposits	9,066,994	9,376,501	(309,508)	(3.3%)
Overnight	367,839	362,264	5,575	1.5%
Accounts and deposits	40,959,562	52,660,417	(11,700,855)	(22.2%)
Investment loans	17,137,072	17,012,469	124,603	0.7%
Overdrafts	9,681,512	8,698,256	983,256	11.3%
Leasing receivables	1,926,914	1,986,263	(59,349)	(3.0%)
Factoring	239,727	121,038	118,689	98.1%
Other loans	2,578	4,293	(1,715)	(40.0%)
Loans and advances (net)	28,987,803	27,822,320	1,165,483	4.2%

⁴ Deposit and loan volumes of selected segments have been presented on the basis of data from management information systems, due to the availability of more detailed product information. In order to maintain comparability, data as at 31.12.2023 have been presented in accordance with the segmentation in force in 2024. Deposit volumes do not include balances of certain credit institutions, which are treated as interbank deposits in management reporting, while in financial reporting they are included in Customer deposits; in addition, balances do not include accrued interest not matured



Small and Medium Enterprise Banking

As at 31 December 2024, deposits of Small and Medium-sized Business Banking Customers on a consolidated basis amounted to PLN 16,792,612 thousand and were by PLN 345,155 thousand, i.e. by 2.0%, lower than at the end of 2023. The largest decrease in value was in current accounts by PLN 748,039 thousand, i.e. by 5.4%, partially offset by an increase of PLN 406,533 thousand, i.e. by 12.5%, in term deposits. Current accounts accounted for 77.8% of deposits of SME Banking Customers and their share decreased from 80.6% at the end of 2023, with an increase in the share of time deposits from 19.0% at the end of 2023 to 21.8% at the end of 2024.

The net loans and advances portfolio of the SME Banking segment on a consolidated basis amounted to PLN 6,123,152 thousand as at 31 December 2024 and decreased by PLN 697,406 thousand, or 10.2%, compared with the end of 2023. The largest decrease in value concerned investment loans (by PLN 365,955 thousand) and overdrafts (by PLN 191,724 thousand).

Table 46. Deposits and loans of Small and Medium-sized Enterprise Banking⁵

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Current accounts	13,063,612	13,811,651	(748,039)	(5.4%)
Savings accounts	53,629	57,902	(4,272)	(7.4%)
Term deposits	3,656,917	3,250,384	406,533	12.5%
Overnight	18,453	17,830	623	3.5%
Accounts and deposits	16,792,612	17,137,767	(345,155)	(2.0%)
Investment loans	3,005,929	3,371,884	(365,955)	(10.9%)
Overdrafts	2,600,397	2,792,121	(191,724)	(6.9%)
Leasing receivables	514,905	654,086	(139,181)	(21.3%)
Factoring	249	286	(38)	(13.1%)
Other Loans	1,673	2,181	(508)	(23.3%)
Loans and advances (net)	6,123,152	6,820,558	(697,406)	(10.2%)

⁵ Deposit and loan volumes of selected segments have been presented on the basis of data from management information systems, due to the availability of more detailed product information. In order to maintain comparability, data as at 31.12.2023 have been presented in accordance with the segmentation in force in 2024. Deposit volumes do not include balances of certain credit institutions, which are treated as interbank deposits in management reporting, while in financial reporting they are included in Customer deposits; in addition, balances do not include accrued interest not matured

Profit before tax

Corporate Banking

The Corporate Banking segment generated a profit before tax of PLN 1,310,851 thousand in 2024 (vs. PLN 1,506,404 thousand in 2023, a decrease of 13.0% YoY). The decrease in gross profit was mainly due to a negative result of impairment losses (PLN -206,353 thousand at the end of 2024 vs. a positive result of PLN 43,430 thousand at the end of 2023).

The result from Corporate Banking activities stood at PLN 2,319,017 thousand and was higher by PLN 170,246 thousand or 7.9% compared to 2023, as a result of an increase in net interest income by PLN 185,261 thousand or 13.3% YoY. This result accounted for 29.9% of the Group's net banking income in 2024.

Operating costs and depreciation and amortisation expenses and allocated costs increased by PLN 104,306 thousand, or 18.2% YoY.

Table 47. Profit before tax of the Corporate Banking segment⁶

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2023	change	
			PLN thousand	%
Net interest income	1,581,981	1,396,720	185,261	13.3%
Net fee and commission income	380,923	371,382	9,541	2.6%
Net trading and other income	356,113	380,669	(24,556)	(6.5%)
Net banking income	2,319,017	2,148,771	170,246	7.9%
Net allowances on expected credit losses	(206,353)	43,430	(249,783)	-
Operating expenses and depreciation and amortization	(449,459)	(370,402)	(79,057)	21.3%
Cost allocation	(227,015)	(201,766)	(25,249)	12.5%
Operating result	1,436,190	1,620,033	(183,843)	(11.3%)
Tax on financial institutions	(125,339)	(113,629)	(11,710)	10.3%
Segment profit before tax	1,310,851	1,506,404	(195,553)	(13.0%)

⁶ Data based on the segmentation note included in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024.



Small and Medium Enterprise Banking

The SME Banking segment generated a profit before tax of PLN 441,352 thousand in 2024 (compared with PLN 377,224 thousand in 2023, an increase of PLN 64,128 thousand, or 17.0% YoY).

The result from the banking activities of Small and Medium-sized Enterprises Banking in 2024 amounted to PLN 826,451 thousand and was higher by PLN 87,818 thousand, or 11.9%, compared to 2023. This result represented in 2024 10.7% of the Group's net banking income.

There was an improvement in net interest income by PLN 111,518 thousand, or 21.9%, while net fee and commission income and net trading and other income were lower by PLN 9,091 thousand (or 6.4%) and PLN 14,609 thousand (or 16.9%) respectively compared to 2023.

Operating costs and depreciation and amortisation and allocated costs increased by PLN 16,443 thousand in 2024, up 4.8% YoY. The segment recorded positive impairment losses for the second year in a row (PLN 555 thousand in 2024 vs. PLN 7,444 thousand in 2023).

Table 48. Profit before tax of the Small and Medium-sized Enterprises Banking segment⁷

PLN thousand	12 months ended	12 months ended	change	
	31.12.2024	31.12.2023	PLN thousand	%
Net interest income	621,002	509,484	111,518	21.9%
Net fee and commission income	133,587	142,678	(9,091)	(6.4%)
Net trading and other income	71,862	86,471	(14,609)	(16.9%)
Net banking income	826,451	738,633	87,818	11.9%
Net allowances on expected credit losses	555	7,444	(6,889)	(92.5%)
Operating expenses and depreciation and amortization	(130,377)	(125,868)	(4,509)	3.6%
Cost allocation	(229,059)	(217,125)	(11,934)	5.5%
Operating result	467,570	403,084	64,486	16.0%
Tax on financial institutions	(26,218)	(25,860)	(358)	1.4%
Segment profit before tax	441,352	377,224	64,128	17.0%

⁷ Data based on the segmentation note included in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024

Bank guarantees

In the field of guarantees and letters of credit, the Bank offers fast and comprehensive services based on dedicated IT solutions.

In 2024, The Bank, at the request of Customers:

- **Corporate Banking Area:** issued 5,888 bank guarantees totalling PLN 3,076.1 million, opened 874 import letters of credit totalling PLN 473.0 million and handled 293 export letters of credit totalling PLN 1,062.3 million issued by third-party banks in favour of these Customers;
- **SME Banking Area:** issued 701 bank guarantees totalling PLN 205.0 million, opened 77 import letters of credit totalling PLN 21.5 million and handled 50 export letters of credit totalling PLN 24.9 million issued by third-party banks in favour of these Customers..



Bank's financial results

Separate statement of profit or loss

BNP Paribas Bank Polska S.A. generated a net profit of PLN 2,320,798 thousand in 2024, by PLN 1,312,970 thousand, i.e. 130.3%, higher than that achieved in 2023.

The Bank's net banking income in 2024 amounted to PLN 7,561,683 thousand and increased by PLN 416,566 thousand, i.e. by 5.8% compared to 2023

Significant factors influencing the level of the net banking income in 2024 and 2023 were the consequences of changes in the macroeconomic situation, including, above all, the level of inflation and the central banks' interest rate policy, which affected, among other things, economic activity and the situation on the financial markets. The most significant for the Bank's results were:

- the persistently high level of interest rates as a consequence of the tightening of monetary policy by the Monetary Policy Council (MPC) in 2022. The first interest rate cuts took place in September and October 2023, when the MPC decreased rates by a total of 100 bps, from 6.75% to 5.75% for the reference rate. Since October 2023, NBP interest rates have remained unchanged. The high level of interest rates had a positive impact on the margins realized by banks in 2023 and 2024,
- the over-liquidity of the banking sector in Poland resulting from the good liquidity situation of Customers and the persistently moderate demand for credit, both in the case of businesses and private individuals. The comfortable situation on the funding side of the Group's business (faster growth in the average value of deposits compared with the relative stabilisation of the average value of the loan portfolio) enabled the optimisation of deposit margins and the generation of income from the placement of funds in financial market instruments, which had a positive impact on the Group's interest earnings in 2024,
- a lower, compared to 2023, negative result on derivatives under hedge accounting related to the scale and structure of hedging transactions and the expected pace and direction of interest rate movements. Interest income from IRS transactions (total on derivatives under fair value hedge accounting and under cash flow hedge accounting) is recognised in net interest income and improved by PLN 345,178 thousand YoY in 2024. The change in measurement to fair value of hedging transactions recognised separately in the result on hedge accounting in 2024 was positive and improved by PLN 32,885 thousand YoY,
- the factor negatively affecting the level of net interest income in 2024 compared to 2023 was the fact that the law regulating the so-called statutory credit holidays was amended in mid-May, allowing them to continue in 2024. The Bank recognised a negative impact of the credit holidays on gross profit in 2024 of PLN 69,474 thousand compared to a positive impact of PLN 55,722 thousand recognised in 2023.

The factors described above had a significant impact on the increase in net interest income in the analysed period. This result was by PLN 505,484 thousand, i.e. by 9.9%, higher YoY.

A factor significantly affecting the level and comparability of the Bank's net result remains the impact of legal risk associated with foreign currency housing loans. In 2024, the charge on this account was PLN 1,182,358 thousand (i.e. 59.8%) lower compared with 2023, amounting to PLN 795,728 thousand.

In addition, in 2024, the change in the estimate of deferred tax created based on provisions for future disbursements related to the process of cancellation of CHF loans had a positive impact on the Group's financial result (income tax burden) in the amount of PLN 135,535 thousand. In 2023, deferred tax additionally created based on provisions for settlement agreements concluded with Customers to CHF loan agreements had a positive impact on the Group's income tax charge in the amount of PLN 24,224 thousand. For details, see Note 53 Litigation and administrative proceedings Consolidated Financial Statements of BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024

An increase in the cost base became apparent in 2024 compared to 2023, due to the impact of inflationary processes and the Bank's ongoing investments. Total administrative expenses and depreciation and amortisation incurred in 2024 were PLN 252,362 thousand, or 8.5%, higher than in 2023 (with personnel expenses alone increasing by PLN 107,208 thousand, or 7.5% YoY, and depreciation and amortisation expenses increasing by PLN 58,203 thousand, or 12.7%). Elements of the regulatory environment that negatively affected the level of 2024 costs compared to 2023 included an increase in the value of the BFG contribution by PLN 20,083 thousand, i.e. by 16.2%.

In 2023, the good quality of the loan portfolio, non-recurring events and changes in forecasts for the macroeconomic situation had a positive impact on the net allowances on expected credit losses of financial assets and provisions for contingent liabilities (low negative result of PLN 22,570 thousand). In 2024, this result normalised (negative result of PLN 225,350 thousand), which means the cost of credit risk at a low level (-27 bps).

Table 49. Statement of profit or loss

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Net interest income	5,631,813	5,126,329	505,484	9.9%
Net fee and commission income	1,202,511	1,161,271	41,240	3.6%
Dividend income	13,147	10,881	2,266	20.8%
Net trading income	841,037	951,591	(110,554)	(11.6%)
Result on investment activities	14,374	11,863	2,511	21.2%
Result on hedge accounting	1,946	(30,939)	32,885	-
Result on derecognition of financial assets measured at amortized cost due to significant modification	(11,569)	4,190	(15,759)	-



PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Other operating income and expenses	(131,576)	(90,069)	(41,507)	46.1%
Net banking income	7,561,683	7,145,117	416,566	5.8%
Net allowances on expected credit losses on financial assets and provisions for contingent liabilities	(225,350)	(22,570)	(202,780)	898.4%
Result on legal risk related to foreign currency loans	(795,728)	(1,978,086)	1,182,358	(59.8%)
General administrative expenses	(2,717,137)	(2,522,978)	(194,159)	7.7%
Depreciation and amortization	(514,858)	(456,655)	(58,203)	12.7%
Operating result	3,308,610	2,164,828	1,143,782	52.8%
Tax on financial institutions	(404,971)	(411,653)	6,682	(1.6%)
Profit before tax	2,903,639	1,753,175	1,150,464	65.6%
Income tax expenses	(582,841)	(745,347)	162,506	(21.8%)
Net profit	2,320,798	1,007,828	1,312,970	130.3%

Please note that due to roundings, individual values in the tables and charts of this Report may not add up.

Net interest income

Net interest income, which is the Bank's main source of revenue, amounted in 2024 to PLN 5,631,813 thousand and was higher YoY by PLN 505,484 thousand, i.e. by 9.9%. In 2024 compared to 2023, net interest income was higher by PLN 464,352 thousand, i.e. by 4.9%, while interest expenses insignificantly decreased by PLN 41,132 thousand, i.e. by 1.0%.

Table 50. Net interest income

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Amounts due from banks	423,790	482,253	(58,463)	(12.1%)
Loans and advances to Customers measured at amortised cost	6,404,285	6,799,742	(395,457)	(5.8%)
Loans and advances to Customers measured at fair value through profit or loss	50,227	80,349	(30,122)	(37.5%)

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Debt instruments measured at amortised cost	972,653	743,329	229,324	30.9%
Debt instruments measured at fair value through profit or loss	7,466	6,928	538	7.8%
Debt instruments measured at fair value through other comprehensive income	850,362	658,027	192,335	29.2%
Derivative instruments as part of fair value hedge accounting	854,393	403,209	451,184	111.9%
Derivative instruments as part of cash flow hedge accounting	11,628	11,627	1	0.0%
Securities purchased under repurchase agreements	330,633	255,621	75,012	29.3%
Total interest income	9,905,437	9,441,085	464,352	4.9%
Amounts due to banks	(496,001)	(361,204)	(134,797)	37.3%
Debt securities issued	-	-	-	-
Amounts due to Customers	(2,436,587)	(2,713,932)	277,345	(10.2%)
Lease liabilities	(23,274)	(28,765)	5,491	(19.1%)
Derivative instruments as part of fair value hedge accounting	(1,275,490)	(1,161,945)	(113,545)	9.8%
Derivative instruments as part of cash flow hedge accounting	(36,561)	(44,099)	7,538	(17.1%)
Securities sold subject to repurchase agreements	(5,711)	(4,811)	(900)	18.7%
Others related to financial assets	-	-	-	-
Total interest expense	(4,273,624)	(4,314,756)	41,132	(1.0%)
Net interest income	5,631,813	5,126,329	505,484	9.9%



Net fee and commission income

The Bank's net fee and commission income in 2024 amounted to PLN 1,202,511 thousand and was by PLN 41,240 thousand, i.e. 3.6% higher than in 2023. This increase was mainly possible due to the adjustment measures taken by the Bank in the area of pricing policy, higher transaction activity of Customers (payments and cards), higher income from asset management and brokerage operations and higher income for advisory services related to M&A transactions handled by the CIB line.

Table 51. Net fee and commission income

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2023	change YoY	
			PLN thousand	%
Fee and commission income				
loans, advances and leases	269,543	312,122	(42,579)	(13.6%)
account maintenance	246,763	228,950	17,813	7.8%
cash service	31,462	34,305	(2,843)	(8.3%)
cash transfers and e-banking	108,047	102,812	5,235	5.1%
guarantees and documentary operations	77,320	74,589	2,731	3.7%
asset management and brokerage operations	103,118	83,314	19,804	23.8%
payment and credit cards	414,307	377,644	36,663	9.7%
insurance mediation activity	148,945	150,402	(1,457)	(1.0%)
product sale mediation and Customer acquisition	23,781	23,364	417	1.8%
other commissions	57,990	39,371	18,619	47.3%
Total fee and commission income	1,481,276	1,426,873	54,403	3.8%
Fee and commission expense				
loans, advances and leases	(998)	(656)	(342)	52.1%
account maintenance	(9,774)	(10,789)	1,015	(9.4%)
cash service	(28,566)	(26,198)	(2,368)	9.0%
cash transfers and e-banking	(2,765)	(3,137)	372	(11.9%)
asset management and brokerage operations	(5,428)	(4,940)	(488)	9.9%
payment and credit cards	(121,800)	(123,463)	1,663	(1.3%)
insurance mediation activity	(21,487)	(20,272)	(1,215)	6.0%

PLN thousand	12 months ended 31.12.2024	12 months ended 31.12.2023	change YoY	
			PLN thousand	%
product sale mediation and Customer acquisition	(23,011)	(21,389)	(1,622)	7.6%
other commissions	(55,816)	(53,769)	(2,047)	3.8%
Total fee and commission expenses	(278,765)	(265,602)	(13,163)	5.0%
Net fee and commission income	1,202,511	1,161,271	41,240	3.6%

Dividend income

Dividend income in 2024 totalled PLN 13,147 thousand and came from the profits of companies for 2023 in which the Bank held a minority interest, i.e.: among others, Biuro Informacji Kredytowej S.A. (PLN 4,131 thousand), Krajowa Izba Rozliczeniowa S.A. (PLN 2,125 thousand), VISA (PLN 1,614 thousand) and Mastercard (PLN 235 thousand).

Dividend income in 2023 totalled PLN 10,881 thousand and came mainly from the profits of companies for 2022 in which the Group held minority interests, i.e.: among others, Biuro Informacji Kredytowej S.A. (PLN 3,942 thousand), National Clearing House (PLN 1,856 thousand), VISA (PLN 664 thousand).

Net trading income and result on investment activities

Net trading income in 2024 amounted to PLN 841,037 thousand and was lower by PLN 110,554 thousand, i.e. by 11.6%, compared to that obtained in 2023. The level and volatility of this result are mainly shaped by the result on foreign exchange and derivative transactions with Customers, the result on transactions concluded by CIB and the Asset and Liability Management Division and the valuation of equity instruments.

Result on investment activities in 2024 amounted to PLN 14,374 thousand, an increase of PLN 2,511 thousand, or 21.2%, compared to 2023.

Other operating income

Other operating income in 2024 amounted to PLN 116,630 thousand, down by PLN 26,198 thousand, or 18.3%, compared to 2023.

**Table 52. Other operating income**

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Sale or liquidation of property, plant and equipment and intangible assets	19,233	20,977	(1,744)	(8.3%)
Impairment allowances on other receivables	7,907	6,602	1,305	19.8%
Sale of goods and services	-	-	-	-
Release of provisions for litigation and claims and other liabilities	19,460	56,090	(36,630)	(65.3%)
Recovery of debt collection costs	19,723	16,973	2,750	16.2%
Recovered indemnities	105	477	(372)	(78.0%)
Leasing operations	18,940	17,991	949	5.3%
Other operating income	31,262	23,718	7,544	31.8%
Total other operating income	116,630	142,828	(26,198)	(18.3%)

Other operating expenses

Other operating costs in 2024 amounted to PLN 248,206 thousand, an increase of PLN 15,309 thousand, or 6.6%, compared with 2023.

Table 53. Other operating expenses

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Loss on sale or liquidation of property, plant and equipment and intangible assets	(13,614)	(16,589)	2,975	(17.9%)
Impairment allowances on other receivables	(10,836)	(8,258)	(2,578)	31.2%
Provisions for litigation and claims and branches restructuring	(59,407)	(70,050)	10,643	(15.2%)
Debt collection	(36,200)	(34,633)	(1,567)	4.5%
Donations made	(7,779)	(11,216)	3,437	(30.6%)

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Costs of leasing operations	(20,318)	(17,425)	(2,893)	16.6%
Costs of compensations, penalties and fines	(2,183)	(9,219)	7,036	(76.3%)
Other operating expenses	(97,869)	(65,507)	(32,362)	49.4%
Total other operating expenses	(248,206)	(232,897)	(15,309)	6.6%

Net allowances on expected credit losses of financial assets and provisions for contingent liabilities

Net allowances on expected credit losses of financial assets and provisions for contingent liabilities in 2024 was a negative PLN 225,350 thousand, compared to a negative result of PLN 22,570 thousand in 2023 (PLN -202,780 thousand YoY).

In 2024, the Bank entered into agreements to sell from the retail, SME and corporate portfolios. The gross carrying amount of the sold portfolio measured at amortised cost was PLN 430,520 thousand, the amount of impairment losses created was PLN 291,643 thousand. The contractual price for the sale of these portfolios was set at PLN 198,143 thousand. The net impact on the Bank's result due to the sale of portfolios amounted to PLN 59,266 thousand and is presented in the line with result on derecognition of financial assets measured at amortized cost due to significant modification.

In 2023. The Bank entered into agreements for the sale of a portfolio of loans from the retail, SME and corporate portfolios. The gross carrying amount of the sold portfolio measured at amortised cost was PLN 390,429 thousand, the amount of impairment losses created was PLN 330,357 thousand. The contractual price for the sale of these portfolios was set at PLN 86,588 thousand. The net impact on the Bank's result from the sale of the portfolios amounted to PLN 26,516 thousand and is presented in the line Net allowances on expected credit losses of financial assets and provisions for contingent liabilities.

The cost of credit risk, expressed as the ratio of the result from allowances to the average gross loans and advances to Customers, measured at amortised cost (calculated on the basis of balances at the end of the quarters), was 0.27% in 2024, compared to 0.03% in 2023. Excluding the impact of the sale of receivables, it estimated that the cost of risk would be 0.34% in 2024 and 0.06% in 2023.

General administrative expenses and depreciation and amortization

The Bank's general administrative expenses (including depreciation and amortisation) for 2024 amounted to PLN 3,231,995 thousand, an increase of PLN 252,362 thousand, or 8.5%, compared to 2023.

**Table 54. General administrative expenses and depreciation and amortization**

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Personnel expenses	(1,528,680)	(1,421,472)	(107,208)	7.5%
Marketing	(103,893)	(81,492)	(22,401)	27.5%
IT and telecom expenses	(305,169)	(271,375)	(33,794)	12.5%
Short-term leasing and exploitation	(82,622)	(84,555)	1,933	(2.3%)
Other non-personnel expenses	(223,734)	(203,109)	(20,625)	10.2%
Outsourced services from other contracts and consulting	(265,940)	(276,474)	10,534	(3.8%)
Business travels	(11,631)	(13,578)	1,947	(14.3%)
ATM and cash handling expenses	(29,952)	(28,407)	(1,545)	5.4%
Costs of outsourcing services related to leasing operations	(1,445)	(2,775)	1,330	(47.9%)
Bank Guarantee Fund fee	(143,992)	(123,909)	(20,083)	16.2%
Commercial Bank Protection Scheme fee	-	(275)	275	(100.0%)
Cost of PFSA supervision	(20,079)	(15,557)	(4,522)	29.1%
Total general administrative expenses	(2,717,137)	(2,522,978)	(194,159)	7.7%
Depreciation and amortization	(514,858)	(456,655)	(58,203)	12.7%
Total expenses	(3,231,995)	(2,979,633)	(252,362)	8.5%

Table 55. Personnel expenses

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Payroll expenses	(1,226,044)	(1,118,452)	(107,592)	9.6%
Payroll charges	(218,156)	(198,955)	(19,201)	9.7%
Employee benefits	(58,002)	(52,608)	(5,394)	10.3%
Costs of restructuring provision	(649)	(31,305)	30,656	(97.9%)

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Costs of provision for future liabilities arising from unused annual leave and retirement benefits	(5,237)	(5,871)	634	(10.8%)
Appropriations to Social Benefits Fund	(19,074)	(15,041)	(4,033)	26.8%
Other	(1,518)	760	(2,278)	(299.7%)
Total personnel expenses	(1,528,680)	(1,421,472)	(107,208)	7.5%

The Bank's **capital expenditure** in 2024 amounted to PLN 442,757 thousand and was higher by PLN 6,821 thousand, or 1.6%, compared with 2023. The increase mainly concerned computer hardware and software and improvements to third-party fixed assets. At the same time, expenditure on external personnel expenses decreased. The volume of capital expenditure is adapted to the Bank's current needs and capabilities. All projects are analysed from the point of view of rationality and impact on the financial and business situation of the Bank and the Group.

Statement of other comprehensive income

The Bank's total comprehensive income in 2024 amounted to PLN 2,346,678 thousand, an increase of PLN 755,814 thousand, or 47.5%, compared to 2023.

The increase in the Bank's total income was driven by an increase in net financial result, which at the end of 2024 was higher by PLN 1,312,970 thousand, or 130.3%, compared with the end of 2023.

The Bank's other comprehensive income was negatively impacted by:

- a change in the valuation of financial assets measured at fair value through other comprehensive income (PLN 43,787 thousand in 2024 vs PLN 653,872 thousand 2023). The change in valuation is primarily the result of changes in interest rate expectations and changes in the composition of the securities portfolio during the period;
- negative valuation of cash flow hedge accounting derivatives (PLN -10,138 thousand in 2024 vs PLN 67,303 thousand in 2023).



Table 56. Statement of other comprehensive income

PLN thousand	12 months ended	12 months ended	change YoY	
	31.12.2024	31.12.2023	PLN thousand	%
Net profit	2,320,798	1,007,828	1,312,970	130.3%
Other comprehensive income				
Items that may be reclassified subsequently to profit or loss upon fulfilment of certain conditions	27,255	584,151	(556,896)	(95.3%)
Measurement of financial assets measured at fair value through other comprehensive income, gross	43,787	653,872	(610,085)	(93.3%)
Deferred income tax on the valuation of gross financial assets measured through other comprehensive income	(8,320)	(124,236)	115,916	(93.3%)
Measurement of cash flow hedge accounting derivatives	(10,138)	67,303	(77,441)	-
Deferred income tax on valuation of gross derivatives hedging cash flows	1,926	(12,788)	14,714	-
Items that will not be reclassified to profit or loss	(1,375)	(1,115)	(260)	23.3%
Actuary valuation of employee benefits	(1,698)	(1,377)	(321)	23.3%
Deferred income tax on actuarial valuation of gross personnel expenses	323	262	61	23.3%
Other comprehensive income (net)	25,880	583,036	(557,156)	(95.6%)
Total comprehensive income	2,346,678	1,590,864	755,814	47.5%

Statement of financial position

Assets

The Bank's total assets as at the end of 2024 amounted to PLN 163,087,501 thousand, an increase of PLN 6,699,102 thousand, or 4.3%, compared with the end of 2023.

Table 57. Assets

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Cash and balances at Central Bank	11,325,551	6,883,582	4,441,969	64.5%
Amounts due from banks	7,789,297	17,890,698	(10,101,401)	(56.5%)
Derivative financial instruments	2,440,116	3,146,745	(706,629)	(22.5%)
Differences from hedge accounting	230,658	94,496	136,162	144.1%
Loans and advances to Customers measured at amortised cost	81,189,258	81,137,225	52,033	0.1%
Loans and advances to Customers measured at fair value through profit or loss	452,506	653,582	(201,076)	(30.8%)
Securities measured at amortised cost	32,364,550	26,246,278	6,118,272	23.3%
Securities measured at fair value through profit or loss	320,925	290,887	30,038	10.3%
Securities at fair value through other comprehensive income	23,027,454	16,634,303	6,393,151	38.4%
Intangible assets	978,163	940,082	38,081	4.1%
Property, plant and equipment	946,796	959,737	(12,941)	(1.3%)
Deferred tax assets	685,634	608,064	77,570	12.8%
Current income tax receivables	-	-	-	-
Other assets	1,228,167	783,994	444,173	56.7%
Total assets	163,087,501	156,388,399	6,699,102	4.3%

Loan portfolio

Structure of loan portfolio

At the end of 2024, gross loans and advances to Customers (the sum of portfolios measured at amortised cost and measured at fair value) amounted to PLN 84,049,044 thousand, down slightly by PLN 237,732 thousand, or 0.3%, compared with the end of 2023.

**Table 58. Structure of the loan portfolio measured at amortised cost**

PLN thousand	31.12.2024		31.12.2023	
	total gross	share %	total gross	share %
Business entities, excluding farmers	36,190,293	43.3%	37,221,708	44.6%
Farmers	7,769,080	9.3%	7,765,713	9.3%
Retail Customers	32,858,093	39.3%	34,410,687	41.2%
- mortgage loans	20,207,062	24.2%	21,986,449	26.3%
PLN	19,779,708	23.7%	21,146,369	25.3%
currency	427,354	0.5%	840,080	1.0%
- cash loans	8,487,233	10.2%	8,217,733	9.8%
- other retail loans	4,163,798	5.0%	4,206,505	5.0%
Lease receivables	151,860	0.2%	226,332	0.3%
Public sector institutions	67,960	0.1%	58,375	0.1%
Other financial institutions	6,484,263	7.8%	3,858,748	4.6%
Gross loans and advances	83,521,549	100.0%	83,541,563	100.0%

Quality of the loan portfolio

The ratio of Stage 3 and POCI non-performing to gross loans and advances to Customers measured at amortised cost was 3.2% at the end of 2024, up 0.3 p.p. compared to year-end 2023. Provision coverage of Stage 3 and POCI non-performing exposures was 55.9% at the end of 2024 and decreased by 5.4 p.p. compared to 2023.

Table 59. Coverage of the loan portfolio measured at amortised cost with impairment losses

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Gross loans and advances to Customers, total	83,521,549	83,541,563	(20,014)	(0.0%)
Allowances for receivables	(2,332,291)	(2,404,338)	72,047	(3.0%)
Net loans and advances to Customers, total	81,189,258	81,137,225	52,033	0.1%
Non-impaired exposures (Stage 1 and 2) and POCI performing				

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Gross balance sheet exposure	80,886,813	81,045,142	(158,329)	(0.2%)
Allowance	(860,335)	(874,841)	14,506	(1.7%)
Net balance sheet exposure	80,026,478	80,170,301	(143,823)	(0.2%)
Impaired exposures (Stage 3) and POCI non-performing				
Gross balance sheet exposure	2,634,736	2,496,421	138,315	5.5%
Impairment allowance	(1,471,956)	(1,529,497)	57,541	(3.8%)
Net balance sheet exposure	1,162,780	966,924	195,856	20.3%

Indicators	31.12.2024	31.12.2023	change
Share of Stage 3 and POCI non-performing in the gross portfolio	3.2%	3.0%	0,2 p.p.
Provision coverage of Stage 3 and POCI non-performing exposures	55.9%	61.3%	(5.4 p.p.)

Table 60. Quality of the loan portfolio measured at amortised cost

PLN thousand	31.12.2024			31.12.2023		
	total gross	NPL*	share %	total gross	NPL*	share %
Business entities, excluding farmers	36,190,293	1,479,716	4.1%	37,221,708	1,171,257	3.1%
Farmers	7,769,080	405,438	5.2%	7,765,713	478,659	6.2%
Retail Customers	32,858,093	715,413	2.2%	34,410,687	780,946	2.3%
- mortgage loans	20,207,062	288,465	1.4%	21,986,449	313,433	1.4%
PLN	19,779,708	172,862	0.9%	21,146,369	171,090	0.8%
Currency	427,354	115,603	27.1%	840,080	142,343	16.9%
- cash loans	8,487,233	320,712	3.8%	8,217,733	361,676	4.4%
- other retail loans	4,163,798	106,236	2.6%	4,206,505	105,837	2.5%
Lease receivables	151,860	24,894	16.4%	226,332	51,931	22.9%



PLN thousand	31.12.2024			31.12.2023		
	total gross	NPL*	share %	total gross	NPL*	share %
Public sector institutions	67,960	-	-	58,375	31	0.1%
Non-banking financial institutions	6,484,263	9,275	0.1%	3,858,748	13,597	0.4%
Gross loans and advances	83,521,549	2,634,736	3.2%	83,541,563	2,496,421	3.0%

* NPL - a category defined as loans and advances in Stage 3 and POCI non-performing according to the information presented in note 21 to the Separate Financial Statement

The collateral value held for Customer loans at the end of 2024 amounted to PLN 1,792,387 thousand, (at the end of 2023 - 1,677,590 thousand). Details of collateral held are included in Note 54.2 of the Separate Financial Statements. for the year ended 31 December 2024.

Liabilities and equity

As at 31 December 2024, the Bank's total liabilities amounted to PLN 147,775,592 thousand and were PLN 4,199,902 thousand or 2.9% higher than at the end of 2023. The share of liabilities in the Bank's total liabilities and equity was 90.6% at the end of 2024 (-1.2 p.p. compared with the end of 2023).

Table 61. Liabilities and equity

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Amounts due to the Central Bank	-	-	-	-
Amounts due to other banks	5,757,872	4,571,172	1,186,700	26.0%
Derivative financial instruments	2,311,741	2,865,275	(553,534)	(19.3%)
Differences from hedge accounting	260,025	(7,365)	267,390	-
Amounts due to Customers	130,830,128	127,134,065	3,696,063	2.9%
Debt securities issued	-	-	-	-
Subordinated liabilities	3,420,128	4,336,072	(915,944)	(21.1%)
Leasing liabilities	606,204	626,174	(19,970)	(3.2%)
Other liabilities	2,262,300	2,133,200	129,100	6.1%
Current tax liabilities	358,468	376,736	(18,268)	(4.8%)
Provisions	1,968,726	1,540,361	428,365	27.8%

PLN thousand	31.12.2024	31.12.2023	change	
			PLN thousand	%
Total liabilities	147,775,592	143,575,690	4,199,902	2.9%
Share capital	147,800	147,677	123	0.1%
Supplementary capital	9,110,976	9,110,976	0	0.0%
Other reserve capital	4,024,205	3,513,978	510,227	14.5%
AT1 Capital bonds	650,000	-	650,000	-
Revaluation reserve	(541,084)	(566,964)	25,880	(4.6%)
Retained earnings	1,920,012	607,042	1,312,970	216.3%
- retained profit	(400,786)	(400,786)	-	0.0%
- net profit for the period	2,320,798	1,007,828	1,312,970	130.3%
Total equity	15,311,909	12,812,709	2,499,200	19.5%
Total liabilities and equity	163,087,501	156,388,399	6,699,102	4.3%

As at 31 December 2024 the Bank's equity amounted to PLN 15,311,909 thousand and increased by PLN 2,499,200 thousand, or 19.5%, compared with 31 December 2023. The share of total equity in the Bank's total liabilities and equity was 9.4% at the end of 2024 (compared with 8.2% at the end of 2023).

Amounts due to Customers

At the end of 2024, amounts due to Customers amounted to PLN 130,830,128 thousand and were higher by PLN 3,696,063 thousand, or 2.9%, compared with the end of 2023.

Table 62. Amounts due to Customers by product

	31.12.2024		31.12.2023	
	PLN thousand	share %	PLN thousand	share %
Current accounts	86,336,306	66.0%	84,670,725	66.6%
Term deposits	43,070,184	32.9%	41,053,999	32.3%
Loans and advances received	449,955	0.4%	460,893	0.4%
Other liabilities	973,683	0.7%	948,448	0.7%
Amounts due to Customers, including:	130,830,128	100.0%	127,134,065	100.0%
Deposits	130,380,173	99.7%	126,673,172	99.6%



Equity

As at the end of 2024, the Bank's equity amounted to PLN 15,311,909 thousand, which was PLN 2,499,200 thousand or 19.5% higher than at the end of 2023.

The increase in equity was driven by higher net profit in 2024 (by PLN 1,312,970 thousand YoY) and a higher share capital balance (by PLN 123 thousand as a result of the issue of series M and N shares).

The increase in other reserves was mainly due to the distribution of profit for 2023. Pursuant to Resolution No. 7 of the Bank's Annual General Meeting of 16 April 2024, of the Bank's profit after tax for 2023 (PLN 1,007,828 thousand), PLN 503,998 thousand was allocated to dividends and the remaining part of PLN 503,830 thousand to reserve capital.

In addition, in Q4 2024, the Bank issued the capital bonds referred to in Article 27a of the Bond Act of 15 January 2015, which were acquired by BNP Paribas SA, Paris, on 28 November 2024. The total nominal value of the capital bond issue, presented within equity in the AT1 Capital bonds line, amounted to PLN 650,000 thousand.

On 2 January 2025, the Bank received a decision from the Polish Financial Supervision Authority dated 31 December 2024 to approve the qualification of Series A capital bonds totalling PLN 650,000 thousand as additional instruments in Tier 1 capital.

Own fund and capital ratios

The Bank's total capital ratio as at 31 December 2024 was 17.58%, an increase of 0.30 p.p. compared to December 2023. The Bank's common equity tier 1 (CET I) capital ratio as at 31 December 2024 was 13.38% (an increase of 0.41 p.p. compared to the end of 2023) and the Bank's unconsolidated Tier 1 Capital Ratio as at 31 December 2024 was 14.10% (an increase of 1.13 p.p. compared to the end of 2023).

The increase in capital adequacy ratios was mainly due to the issue of AT1 capital bonds in the amount of PLN 650,000 thousand, the inclusion of the profit for 2023 in common equity tier 1 capital and the improvement in the result from unrealised gains and losses measured at fair value through other comprehensive income due to the introduction of the so-called 'temporary treatment period' (Article 468 CRR). As at 31 December 2024, total own funds increased by PLN 988,047 thousand compared to year-end 2023, and total risk exposures increased by PLN 4,168,244 thousand.

Table 63. Own funds and Capital Ratios of the Bank

PLN thousand	31.12.2024	31.12.2023	change YoY	
			PLN thousand	%
Share capital (CET I)				
- share capital	147,800	147,677	123	0.1%
- supplementary capital	7,259,316	7,259,316	-	0.0%

PLN thousand	31.12.2024	31.12.2023	change YoY	
			PLN thousand	%
- reserve capital	5,198,711	4,688,485	510,227	10.9%
- general banking risk fund	627,154	627,154	-	0.0%
- Intangible assets	(545,689)	(502,103)	(43,586)	8.7%
- other components of own funds, included in the calculation of basic capital (CET 1)	(570,403)	(1,014,544)	444,141	(43.8%)
Total share capital (CET I)	12,116,889	11,205,985	910,904	8.1%
Additional Tier 1 capital	650,000	-	650,000	-
Total Tier 1 capital	12,766,889	11,205,985	1,560,904	13.9%
Supplementary funds (Tier 2)				
- subordinated liabilities included in own funds	3,150,021	3,722,878	(572,857)	(15.4%)
Total equity	15,916,910	14,928,863	988,047	6.6%
Amount of risk exposure due to				
- credit risk	78,742,649	75,835,028	2,907,621	3.8%
- market risks	1,338,766	1,470,850	(132,084)	(9.0%)
- operational risks	10,422,548	9,043,236	1,379,312	15.3%
- credit valuation adjustments	50,112	36,717	13,395	36.5%
Total risk exposure amount	90,554,074	86,385,831	4,168,244	4.8%

Bank Capital Ratios	31.12.2024	31.12.2023	zmiana
Common Equity Tier 1 Capital Ratio (CET I)	13.38%	12.97%	+0.41 p.p.
Tier 1 Capital Ratio	14.10%	12.97%	+1.13 p.p.
Total Capital Ratio (TCR)	17.58%	17.28%	+0.30 p.p.



The minimum levels of solvency ratios resulting from legislation and administrative decisions issued by the FSA on a stand-alone basis are:

Minimum levels of the Bank Capital Ratios	31.12.2024	31.12.2023	change
Common Equity Tier 1 Capital Ratio (CET I)	7.50%	7.96%	(0.46 p.p.)
Tier 1 Capital Ratio	9.00%	9.46%	(0.46 p.p.)
Total Capital Ratio (TCR)	11.00%	11.46%	(0.46 p.p.)

At the end of 2024, all the Bank's capital adequacy ratios were above the minimum requirements by:

- 5.88 p.p. for the Common Equity Tier 1 Ratio,
- 5.10 p.p. for the Tier 1 Capital Ratio,
- 6.58 p.p. for the Total Capital Ratio.

Minimum level of own funds and eligible liabilities (MREL) requirement

On 20 June 2023, the Bank received a letter from the Bank Guarantee Fund regarding the joint decision of the resolution authorities, i.e. the Single Resolution Board and the Bank Guarantee Fund, on the minimum level of own funds and eligible liabilities (MREL). The Joint Decision indicates that the group resolution plan provides for a resolution strategy providing for a Single Point of Entry (SPE) in the event of resolution. The preferred resolution tool for the Bank is the open bank bail-in tool.

The MREL requirement for the Bank was set at the individual level at 16.11% of the total risk exposure (TREA) and 5.91% of the total exposure measure (TEM). This requirement was in force from 31 December 2023.

On 31 May 2024, the Bank received an updated letter from the Bank Guarantee Fund regarding the MREL requirement. This requirement for the Bank has been set at the individual level at 16.02% of the total risk exposure ("TREA") and 5.91% of the total exposure measure ("TEM"). This requirement is effective from 31 May 2024.

The entire MREL requirement should be met in the form of own funds and liabilities meeting the criteria set out in Article 98 of the Act on the Bank Guarantee Fund, which is a transposition of Article 45f(2) of the BRRD2. According to the Decision, the part of the MREL corresponding to the amount of recapitalisation (RCA) will be fulfilled in the form of AT1, T2 and other subordinated eligible liabilities acquired directly or indirectly by the parent undertaking. The Bank fulfills this requirement. At the same time, the BFG indicated that instruments in Common Equity Tier 1 (CET1) capital held by the Bank for the purposes of the combined buffer requirement (CBR) cannot be included in the MREL requirement expressed as a percentage of TREA. This rule does not apply to the MREL requirement expressed as a percentage of TEM.

On 16 September 2024, the Bank notified BNP Paribas S.A (the lender) that it had exercised its right to exercise its option for early repayment of loans included in Tier 2 capital in the amounts of PLN 440 million and EUR 40 million raised under separate agreements on 29 December 2015. These loans were repaid on 7 October 2024. The Bank had previously obtained approvals from the Financial Supervision Authority to exercise the repayments of the indicated loans. On 30 November 2024, the Bank communicated to BNP Paribas Succursale de Luxembourg (the lender) that it had made an early repayment of the Tier II loan of EUR 60 million raised under the agreement on 22 November 2016. This loan was repaid on 22 November 2024, subject to prior approval by the Polish Financial Supervision Authority.

On 12 September 2024, 29 October 2024 and 19 December 2024, the Bank entered into agreements with BNP Paribas S.A. to raise Senior Non Preferred loans of EUR 142 million, EUR 60 million and EUR 100 million respectively. The loans in question have been recognised for the purposes of meeting the MREL ratios in relation to TREA and TEM.

The Bank meets the defined MREL requirements as at 31 December 2024.

MREL factors	requirement at 31.12.2024	requirement at 31.12.2024 including CBR	31.12.2024	31.12.2023
TREA	16.02%	19.02%	22.83%	21.74%
TEM	5.91%	5.91%	11.61%	11.02%

Financial ratios

The Bank's return on equity (ROE), calculated on a reported basis, stood at 16.7% at the end of 2024. and was 8.6 p.p. higher than in 2023. Return on assets (ROA), calculated in a similar manner, was 1.5% and increased by 0.8 p.p. compared to 2023. The levels of the return ratios in 2022 are largely distorted by the occurrence of the negative impact of credit holidays and, in 2022-2023, additionally by the recognition of the significant negative impact of legal risks related to litigation concerning foreign currency housing loans.

The cost/income ratio calculated on the basis of reported volumes was 42.7% (a level 1 p.p. higher compared to 2023. - primarily as a result of an increase in the cost base due to the impact of inflationary processes and ongoing investments and slightly higher regulatory costs).

The net interest margin calculated in relation to average assets was 3.6%, 1 p.p. higher than the level calculated for 2023.

Changes in the values of the ratios representing the ratio of net and gross loans to deposits and funding sources reflect the good liquidity situation observed in 2024 and 2023.

**Table 64. Financial ratios**

	31.12.2024	31.12.2023	31.12.2022	zmiana 2024/2023
Return on capital ⁽¹⁾	16.7%	8.2%	3.3%	+8.6 p.p.
Return on assets ⁽²⁾	1.5%	0.7%	0.3%	+0.8 p.p.
Net interest margin ⁽³⁾	3.6%	3.5%	2.5%	+0.1 p.p.
Costs/income ⁽⁴⁾	42.7%	41.7%	56.8%	+1.0 p.p.
Costs/income without BFG, IPS and credit holidays	40.5%	40.3%	42.5%	+0.2 p.p.
Credit risk costs ⁽⁵⁾	(0.27%)	(0.03%)	(0.33%)	(0.24 p.p.)
Credit risk costs without impact of sale of receivables ⁽⁶⁾	(0.34%)	(0.06%)	(0.37%)	(0.28 p.p.)
Net lending/deposits ⁽⁷⁾	62.6%	64.6%	69.6%	(2.0 p.p.)

(1) Ratio of net profit to average equity calculated on an end-of-quarter basis.

(2) Ratio of net profit to average assets calculated on a quarter-end basis.

(3) Relation of net interest income to average assets calculated on a quarter-end basis. Annualisation of net interest income taking into account the actual number of days.

(4) Ratio of total administrative overheads and depreciation and amortisation to result from banking activities, calculated as the sum of net interest income, net fee and commission income, dividend income, result on trading activities, result on investing activities, result on hedge accounting and other operating income and expenses.

(5) Relation of the result of impairment losses on financial assets and provisions for contingent liabilities to the average gross loans and advances to Customers, measured at amortised cost, calculated on the basis of balances at the end of the quarters. Annualisation of the result of write-downs taking into account the actual number of days.

(6) Calculation made eliminating the impact of the sale of non-performing loan portfolios (in 2024: +PLN 59,266 thousand, in 2023: +PLN 26,516 thousand, in 2022: +PLN 34,044 thousand).

(7) Ratio of loans and advances to Customers (net) to Customer deposits. Balance at the end of the period

Average interest rates applied by the Bank

Table 65. Average Bank interest rates *

Product	PLN		EUR	
	2024	2023	2024	2023
Deposits (categories below)	2.16%	2.67%		
Households and non-commercial institutions	2.09%	2.56%		
Non-financial companies	2.24%	2.81%		
Loans (categories below)	8.00%	7.98%	4.84%	4.40%
Households and non-commercial institutions	8.24%	7.79%	5.40%	4.91%
Non-financial companies	7.52%	8.39%	4.83%	4.39%

* based on the Bank's mandatory reporting to the NBP Statistics Department



Risk and opportunities

112 Risk management system

115 Principal types of risk



Risk management system

The risk management system is an integrated set of principles, mechanisms and tools (including policies and procedures) relating to risk processes. Risk management is part of the overall Bank management system. In addition to regulatory requirements, the Bank takes into account the specific nature, scale and complexity of its business activities and the associated risk. The main objectives of the risk management system:

- ensuring early identification and appropriate management of all significant types of risk associated with the conducted activity,
- supporting the implementation of the business strategy through effective risk control and maintaining it within the accepted risk appetite,
- reflecting the Bank's adopted risk attitude and risk culture,
- measurement or estimation and monitoring of risk, including securing potential losses through appropriate control mechanisms,
- limiting risk by determining a system of limits and procedures to be followed in case of their exceedance,
- defining an organizational structure adapted to the size and profile of the risk incurred.

The risk management system operating in the Bank is organized based on the three independent lines of defense scheme, used to define roles and scopes of responsibility for effective supervision and organization of risk management in the Bank:

- **first line of defence** is made up of business units, which are responsible for managing risk in the Bank's operational activity, including compliance with control mechanisms,
- **second line of defence** is made up of designated organizational units of the Risk Area, Finance Area, Compliance Monitoring Division, and Legal Division, which are responsible for managing individual risks, including measuring, monitoring, controlling, and reporting risks, independently of the first line,
- **third line of defence** is the activity of the Internal Audit Division, which makes independent assessments of actions related to risk management carried out by both the first and second line of defense.

The supreme role in the risk management system in the Bank is played by the Bank's Management Board, which sets the risk management strategy, risk appetite, and adopts risk management policies, and sets limits for significant types of risk and risk control procedures. The principles of risk management originate from the Risk Management Strategy document in BNP Paribas Bank Polska S.A. defined by the Bank's Management Board and approved by the Supervisory Board.

The organization of the risk management system in the Bank primarily takes into account the role of the Supervisory Board, the Bank's Management Board, dedicated committees (Audit Committee and Risk Committee at the Supervisory Board level, Asset and Liability Management Committee (ALCO), Risk Management Committee, Retail Banking & Personal Finance Risk Committee, Credit Committee, Difficult Loans Committee, TAC/NAC Committee and Internal Control Committee), Risk Area, Compliance Monitoring Division, and Security and Business Continuity Management Division.

Assessment of the adequacy of internal capital

The purpose of the internal capital adequacy assessment process is to monitor and control the level of the Bank's internal capital. The implementation of the ICAAP process is dictated by the desire to maintain the Bank's stable financial situation, guaranteeing the Bank's operation despite incurring unexpected losses. The Bank has a duty to ensure that the risk management process is consistent with the Bank's risk profile and that it limits excessive risk in its operation. The details of the process are defined in the Policy for estimating internal capital at BNP Paribas Bank Polska S.A.

The Bank has developed comprehensive principles for identifying and assessing risks in response to the requirements of the supervisory review and evaluation process. The principles aim to identify and assess all risks to which the Bank is or may be exposed, taking into account regulatory requirements, best practices, and the use of the Bank's proven existing risk management processes. The Bank takes into account the specific nature, scale, and complexity of its business activity and the associated risk, ensuring that all significant types of risk in the Bank's activity are measured and limited. The Bank seeks to identify and assess threats from both the internal and external environment that could have a significant impact on the Bank's financial stability.

The identification of potentially material risks involves distinguishing threats and potential risks that may occur in the future with an appropriate degree of probability.

The risk management process is tasked with:

- protecting the Bank from risk materialization,
- ensure an adequate assessment of capital needs necessary for identified risks.

The risk identification process is carried out annually in the Bank.

The assessment of the significance level of the risks identified in the identification process includes:

- defining the concept of risk significance,
- defining the factors determining the significance of risks,
- carrying out a risk materiality assessment,
- preparing a report from the conducted assessment.

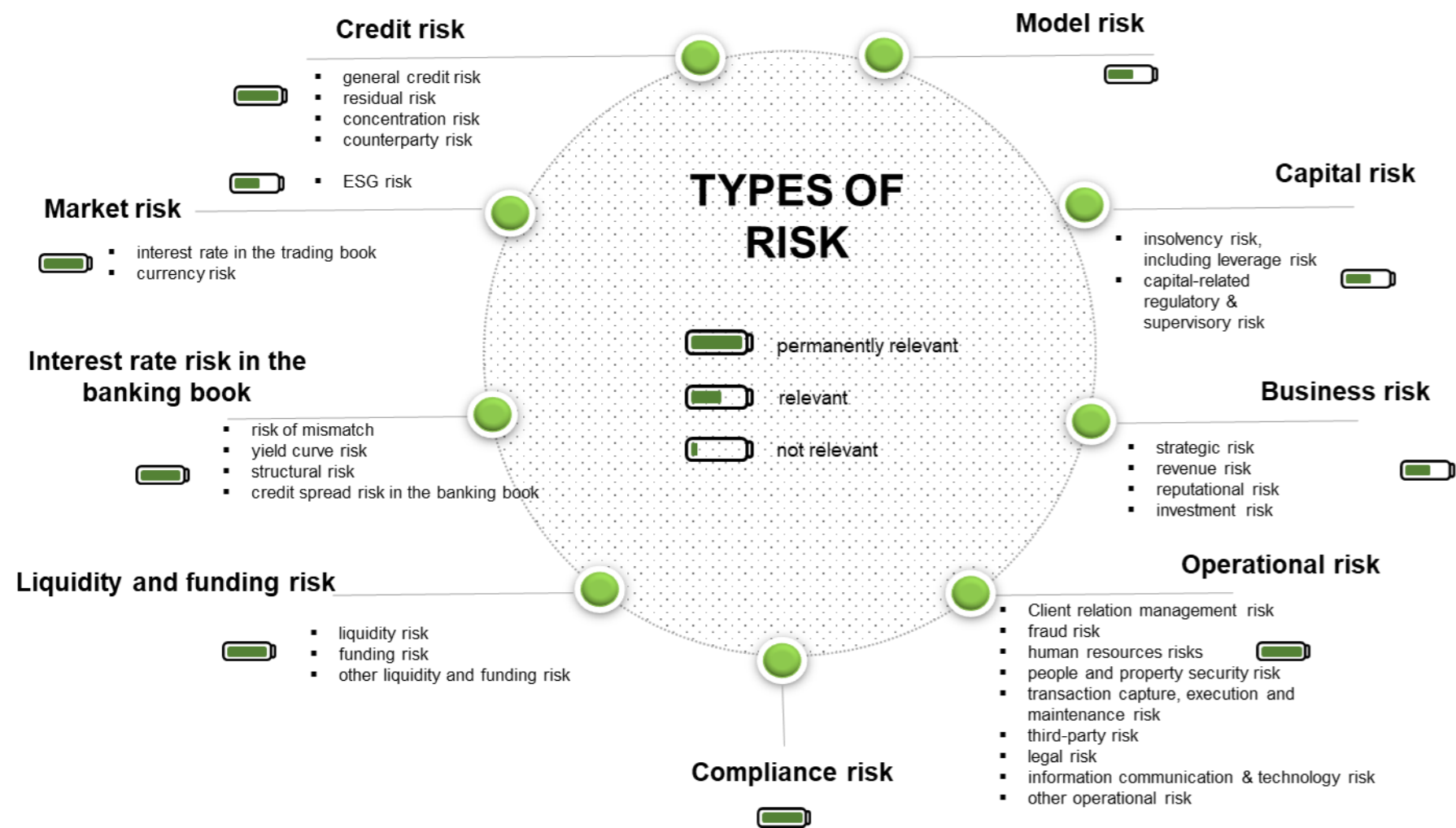
The process of assessing the significance of risks is carried out annually in the Bank.

The Bank identifies the following types of risks:



- permanently significant - inherently linked to the profile of the activity carried out (do not require periodic significance assessment),
- significant:
 - risks for which the Bank has incurred costs related to their realization in the past,
 - exposure to risk, severity of losses, and lack of suitable risk mitigation processes and procedures expose the Bank to unexpected financial losses (risks for which the significance assessment is at least medium),
- insignificant – risks for which the significance assessment is low.

As a result of the risk identification process and materiality assessment conducted in 2024, the structure of identified risks is as follows:



reports are presented at the Risk Management Committee meeting on a monthly basis and on a quarterly basis for the Bank's Management Board and Supervisory Board.

A review of the capital adequacy process is conducted once a year, and the review report is submitted to the Bank's Management Board and Supervisory Board. In addition, internal audit regularly conducts an independent review of the ICAAP process.

In order to measure risk, the Bank uses two approaches: quantitative and qualitative. The use of a particular approach is related to the characteristics of the risk.

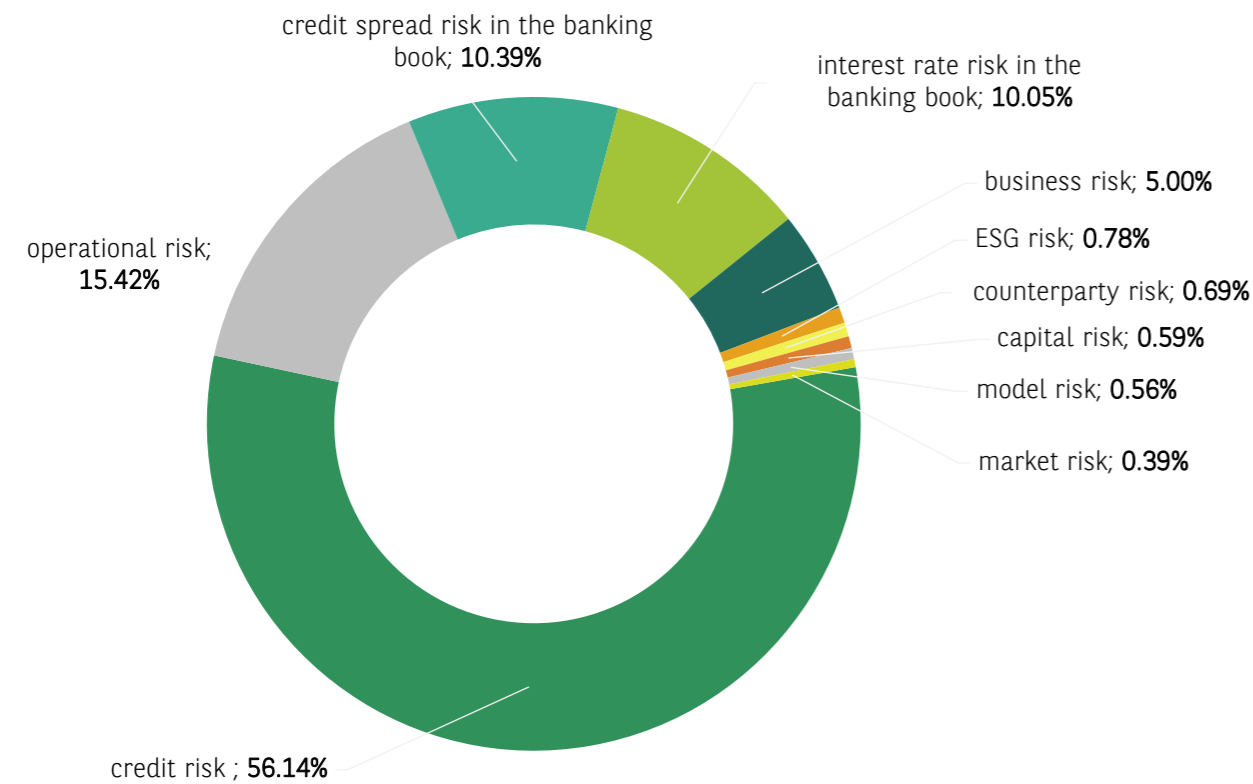
Risk measurement methods:

- quantitative methods - are used when the Bank has information about the realization of risk and is able to measure a quantitative feature,
- qualitative methods - are used when the Bank does not have accumulated information on the historical realization of risk or the effect of risk measure variability is determined by many risk factors, from which the Bank cannot distinguish the effect related to the source of the assessed risk. The Bank considers the risk to be difficult to measure and conducts an assessment using a qualitative method, presenting qualitative characteristics of risk realization.

Internal capital reporting focuses on presenting the results of monitoring the level of internal capital and the main factors determining its level. The Bank reports capital on a monthly basis both in individual terms and on a consolidated basis. The



Chart 18. The structure of the internal capital in the BNP Paribas Bank Polska S.A. as of 31.12.2024



Risk appetite

For identified significant risks, the Bank defines the risk appetite. By setting the level of risk appetite, the Bank defines its risk profile and adopted risk posture. Risk appetite specifies the maximum level of risk that the Bank is ready to accept in pursuing the assumptions of the business strategy and financial plan.

Risk appetite, within the boundaries set by risk tolerance, determines how the Bank uses its ability to take on risk by specifying for each type of risk the degree of exposure that a given area can take. The Bank sets the level of risk appetite in the form of risk measures that reflect the Bank's current and future readiness to take on risk. All methods and procedures are subject to periodic reviews for their adequacy and accuracy. The level of risk appetite is set by the Bank's Management Board, requiring approval from the Supervisory Board.

Additionally, the Bank monitors individual types of risks using a formal limit system, which is set in such a way to:

- ensure the Bank complies with supervisory standards,
- maintain the desired risk profile defined in the business strategy and risk management strategy of the Bank,

- the limits do not exceed the level of risk acceptable by BNP Paribas Group.

In case of limit exceedances, corrective actions are taken to reduce the value of a given risk in line with existing procedures in the Bank. The information system used in risk management ensures the collection of data on operations and transactions and their impact on the Bank's risk profile. The Bank has rules for risk control and risk management that include procedures for dealing with crisis events.

Stress tests

In accordance with the Methodology of the stress test program in BNP Paribas Bank Polska S.A. The Bank performs, among others, the following types of bottom-up tests:

- stress tests based on the recommendations of the Polish Financial Supervision Authority (PFSA),
- business model stress tests,
- internal capital stress tests,
- recovery plan stress tests.

Stress tests are an important tool in the risk management process. They allow extending risk measurement to sensitivity to non-standard changes in market parameters, significantly deviating from changes observed during normal functioning of financial markets. The aim of the stress test program is to estimate potential risks to which the Bank is exposed under hypothetical market conditions. Macroeconomic assumptions are developed by the Bank's Chief Economist. The stress test program fulfills the requirements of EBA/GL/2018/04 guidelines dated July 19, 2018, concerning stress tests.

The stress tests program covers:

- sensitivity analysis,
- scenario analysis,
- reverse stress testing.

The Bank conducts tests referring to the level of risk appetite expressed in the form of risk appetite measures and capital targets set out in the Capital Management Policy in BNP Paribas Bank Polska S.A. Through stress tests, the Bank assesses the credibility of its financial plan and capital plan under extreme conditions, to ensure that the Bank meets the capital requirements that apply to it. The Bank's Management Board approves the stress test program and supervises its implementation and results.



Principal types of risk

Credit risk

Credit risk is the risk of the Bank incurring a loss due to a failure to fulfill obligations within the time specified in the agreement as a result of a deterioration or loss of creditworthiness by the Customer.

The Bank's credit risk management system has been specified in the Credit Policy of BNP Paribas Bank Polska S.A. adopted by the Management Board. Detailed rules and criteria for financing within the product offer of a given business line, types of available loans, financing objectives, conditions and limits are specified in the credit policies for individual business lines. The Bank's intention, in accordance with the criteria of the credit policy, is to cooperate with Customers characterized by a good reputation and a good economic and financial situation.

Credit policies also establish detailed rules for identifying, measuring, and accepting risk, securing the repayment of the loan, and monitoring Customers during the term of the loan agreement.

The credit risk management process is organizationally adapted to the business line structure adopted in the Bank. A key role in the credit risk management system is played by the organizationally distinct Risk Area, which is headed by a member of the Management Board (Chief Risk Officer). Activities in the area of credit risk management are supported by the Risk Management Committee and the Retail Banking/Personal Finance Risk Committees.

The Bank assesses the risk of borrowers using rating and scoring classification systems and risk classification according to IFRS standards.

Credit decisions are made in accordance with the decision-making model approved by the Bank's Management Board and adapted to the standards applicable in the BNP Paribas group. The decision-making model takes into account the structure of business lines, establishes the number of decision-making levels, the scope of their competences, and the rules, criteria, and conditions for making credit decisions. The thresholds for decision-making powers depend on criteria such as the Customer segment, Customer risk profile, and loan period. At all competency levels, credit decisions are made in a two-person mode (the "four eyes" principle) by a representative of the business line and a representative of the organizational unit responsible for an independent assessment of the Customer's risk and transaction. For Customers whose credit risk assessment is made using simplified risk assessment rules or risk assessment models, including scoring models approved by the Risk Management Committee or Retail Banking/Personal Finance Risk Committees, credit decisions can be made unilaterally by representatives of business lines.

In terms of credit risk management, the Bank follows the following principles:

- each credit transaction requires a comprehensive assessment of credit risk, the result of which is an internal rating or scoring assessment,

- a thorough and careful financial analysis forms the basis for recognizing the credibility of the Customer's financial data and information about the value of security; the Bank's prudent analyses always take into account the necessary safety margin,
- as a general rule, the basis for financing a Customer is their ability to generate cash flows that ensure repayment of obligations to the Bank,
- the prepared credit risk assessment is subject to additional verification by credit risk assessment services independent of business services,
- the pricing conditions of the credit transaction must cover the risk of this transaction,
- credit risk is diversified in terms of geographical areas, economic sectors, products, and Customers,
- only authorized persons can make credit decisions,
- the Customer and the transactions concluded with him are monitored in a manner transparent to the Customer and strengthening relations with the Customer

Credit risk management in the Bank's subsidiaries

Principles of credit risk management are defined in the Credit Policy of BNP Paribas Bank Polska SA.

The Bank recommends, reviews, and accepts the policies, principles, and methodologies used by the companies in managing credit risk.

In the Bank and its subsidiaries, methods of credit risk management are used in parallel, including:

- a rating system for Corporate Banking and Small and Medium Enterprises Banking Customers,
- risk classification system according to IFRS standards,
- assessment of the creditworthiness of the Bank's and subsidiaries' common Customers,
- credit decision-making model,
- the Bank's internal limit system for concentration risk, including limits on receivables portfolios of subsidiaries.

Measurement of impairment of financial assets

The principles used by the Group in measuring impairment are described in Note 3a. Impairment of financial assets of the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024.



In 2024, as part of adjusting the level of provisions to expectations regarding the future macroeconomic situation, the level of reserves increased by PLN 21,535 thousand. This resulted from updating the forecasts of macroeconomic variables included in the used MSSF9 model.

In 2024, the Group made one significant change in the reserve calculation process. For all Customer segments, the Group made a change in the process of estimating the CCF parameter. The aim of the change was to adapt to the requirements of Recommendation R and was based on taking into account the estimation process of exposures with negative realization of conversion of off-balance sheet liabilities to balance sheet receivables. This change, combined with the parameter's update to the latest observations, resulted in the creation of provisions at the level of PLN 28,000 thousand.

In 2024, the level of write-offs was influenced by the update of the Post Model Adjustments maintained in connection with the risk of Customers particularly sensitive to changes in the economic environment and corrections of parameters for sensitive Customers using credit holidays - the Group net solved PLN 37,090 thousand of write-downs created for this purpose (including the solution in the amount of PLN 5,155 thousand for exposures of Customers particularly sensitive to changes in the economic environment and PLN 31,935 thousand of the solution in the form of parameter corrections for sensitive Customers using credit holidays).

In addition, in 2024 the Group added additional provisions for risk factors identified in the loan portfolio, including:

- PLN 51,258 thousand in relation to the portfolio risk of farmers whose crops were affected by adverse weather events (including hailstorms and summer droughts),
- PLN 31,500 thousand in connection with sensitive Customer risk in the commercial property segment,
- PLN 72,800 thousand adjustment for Customers operating in sectors exposed to the German economy (automotive, furniture and large domestic appliance manufacturing sectors).

In addition, in 2024, the Group has credited PLN 43,700 thousand in the form of a Post Model Adjustment for the LGD model changes estimated and planned to be implemented. These changes relate to the portfolio of loans secured by real estate in PLN and the portfolio of loans to micro-enterprises.

Taking into account the aforementioned changes, the balance of additional write-downs in the form of Post Model Adjustments as at 31 December 2024 was PLN 232,031 thousand, while the balance as at 31 December 2023 was PLN 69,863 thousand.

Debt restructuring and recovery

In 2024, a total of PLN 1,276.5 million in receivables were obtained, of which:

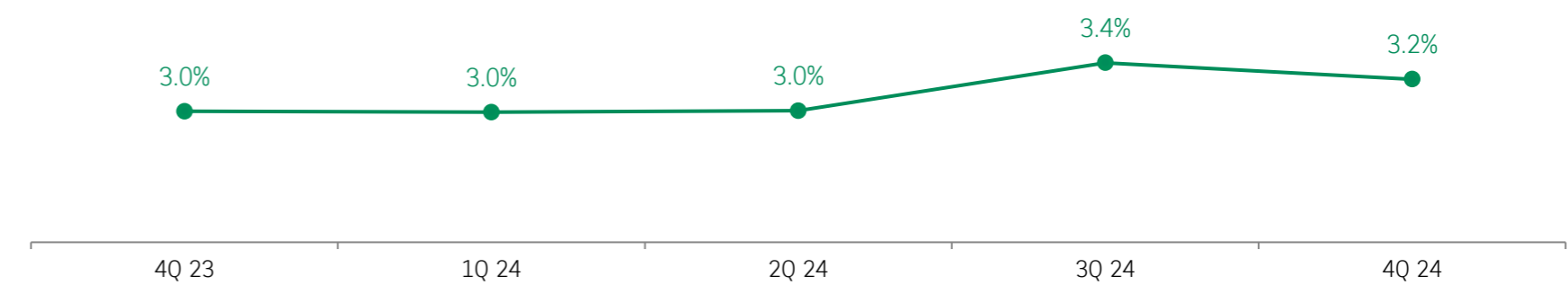
- PLN 23.3 million - as a result of portfolio restructuring (retail Customers PLN 7.8 million, micro-enterprises PLN 14.6 million, mortgages PLN 0.9 million),

- PLN 1,149.4 million - as a result of recovery actions (retail Customers PLN 577.0 million, SMEs PLN 61.1 million, micro-enterprises PLN 352.5 million, corporate entities PLN 5.8 million, mortgages PLN 153.1 million),
- PLN 103.8 million - as a result of the sale of a portfolio with impairment.

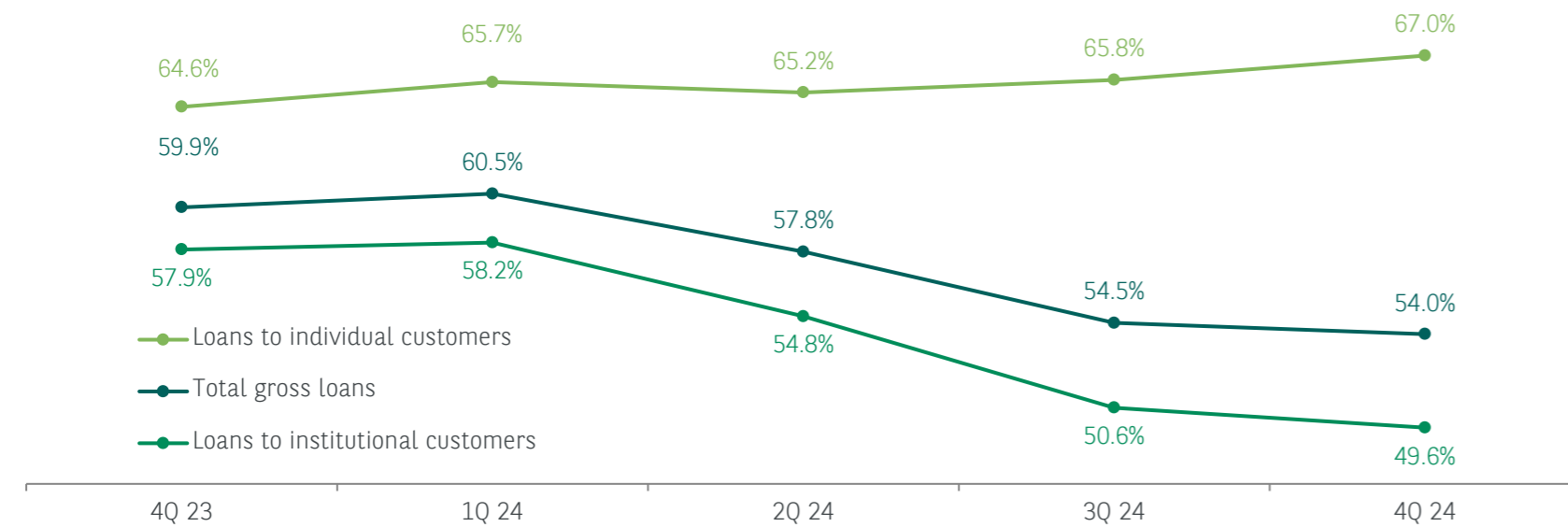
Loan portfolio quality

The share of NPLs in the portfolio measured at amortised cost (NPLs - a category defined as Stage 3 and POCI non-performing as presented in the note to the Consolidated Financial Statements) at 31 December 2024 remained at 3.2%. Maintaining the ratio at a low level was possible thanks to the high efficiency of actions at the various stages of non-performing loans in the process of proactive NPL portfolio management and, in particular, to the effective monitoring of Customers potentially at risk of entering Stage 3 and the high efficiency of collection actions.

Chart 19. NPL ratio



As at 31 December 2024, the coverage rate for loans and advances in Stage 3 and POCI non-performing was 54.0%, a decrease of 0.5 p.p. compared to the coverage level observed at the end of 2023. This was primarily due to the realized NPL sales and an increase in coverage in the Retail Customers segment related to the update of the LGD model.

**Chart 20. NPL provision coverage (gross)**

Detailed information on the quality of the portfolio is presented in the financial performance section of the loan portfolio section of this Report.

The Group also actively monitors the structure of the loan portfolio, including in particular the industry structure. Details are described in the subsection Concentration risk.

Concentration risk

Concentration risk is an inherent risk that the Bank takes as part of its statutory activities and is subject to a specific process and management rules.

The Management Board assesses the adopted concentration risk management policy in terms of how it is applied, particularly in terms of checking its effectiveness and adequacy of the implementation of principles in the context of current and planned activities and taking into account the risk management strategy. In the event of significant changes in the Bank's environment or risk management strategy, the adequacy of the concentration risk management process is reviewed immediately after this event occurs.

To limit concentration risk, mechanisms for identifying and measuring concentration risk and concentration limits, including large exposure limits, are used. They allow for monitoring and maintaining diversification of the credit portfolio at levels consistent with the Bank's strategy and risk appetite. The Bank's limit system also takes into account external conditions and macroeconomic and sector perspectives.

As of the end of December 2024: the limits in a consolidated and individual approach as defined in article 395 of EU Regulation No. 575/2013 were not exceeded in relation to entities of the BNP Paribas S.A. Group and amounted to 10.2% of Tier 1 capital in a consolidated approach.

In the case of the exposure limit to entities outside the BNP Paribas S.A. Group, the limits were also not exceeded, the largest exposure constituted 11.6% of Tier 1 capital in a consolidated approach.

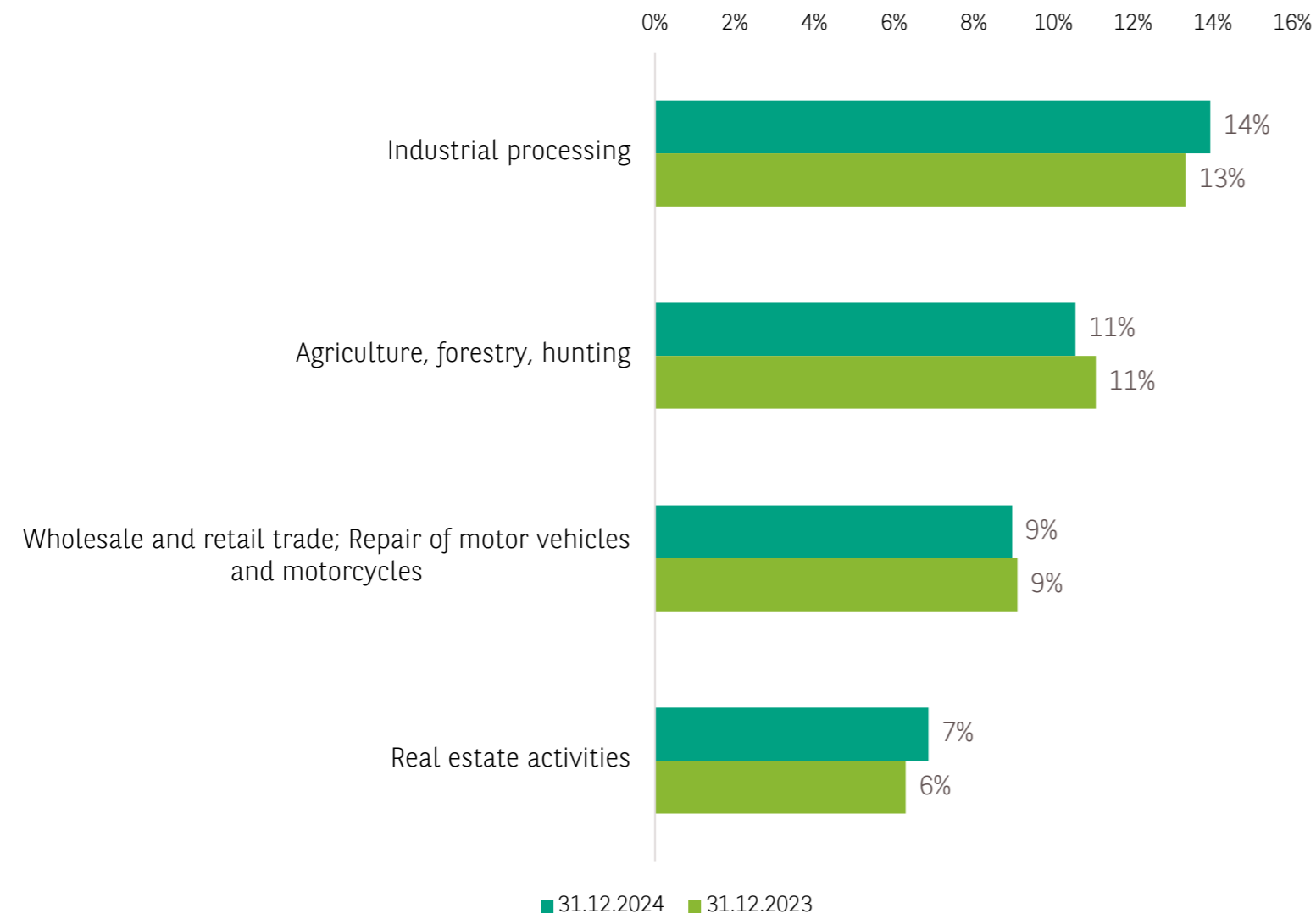
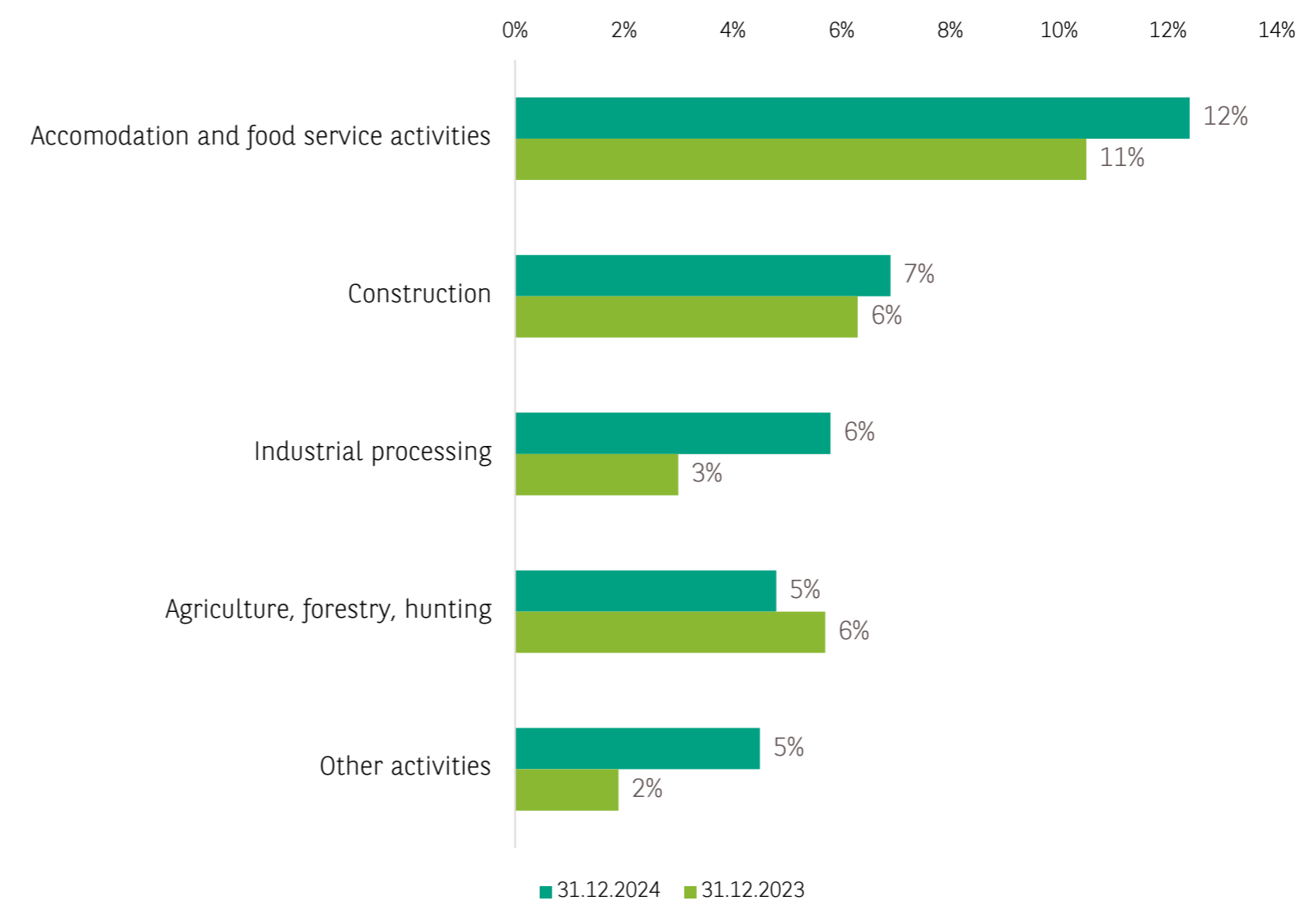
Internal limits for credit concentration risk are set, among others, for:

- selected economic sectors/industries,
- exposures denominated in foreign currency,
- Customer segment (internal Customer segmentation),
- loans secured by a particular type of security,
- geographic regions,
- average probability of default (PD),
- exposures with a specific rating (the Bank's internal rating scale),
- exposures with a specific debt-service-to-income ratio,
- exposures with a specific loan-to-value ratio.

Actions limiting the Bank's exposure to concentration risk can include system-wide actions as well as actions related to individual/specific decisions and transactions. The Bank includes the following in system-wide actions:

- limiting the scope of lending to a particular type of Customer, by modifying the conducted credit policy,
- reducing limits on concentration risk,
- diversification of asset types at the level of the Bank's financial statement,
- changing the business strategy in such a way as to counteract excessive concentration,
- diversification in terms of the types of accepted securities.
- The Bank categorizes actions limiting single / specific decisions and transactions as follows:
 - limiting further transactions with a given Customer or group of related Customers,
 - sale of selected assets / credit portfolios,
 - securitization of assets,
 - establishing new security for existing or new credit exposures.

The industry concentration analysis conducted by the Bank covers all of the Bank's credit exposures to institutional Customers.

**Chart 21. Industry participation in the portfolio of institutional Customers' loans (industries above 5%)****Chart 22. The share of loans with recognized loss of value (over 5%) in the portfolio of a given industry**

BNP Group has the highest share in the "Industrial Processing" sector, where the share of risky loans is 5.8%, similar to the previous year. Meanwhile, the industry with the highest share of risky loans is "Accommodation and catering services", which constitutes only 1% of the balance sheet exposure to Institutional Customers.

More detailed information about the industry engagement can be found in note no. 54 of the Consolidated Financial statements of the BNP Paribas Bank Polska S.A. Capital Group for the year ended 31 December 2024.

In connection with the ongoing war in Ukraine and economic sanctions issued against Russia and Belarus, the Bank has analysed credit exposures directly related to these countries and on this basis has not identified significant exposures in both the Institutional Customers and Retail Customers portfolios.



Counterparty risk

the amount of obligation can assume different values over time, depending on market parameters. Therefore, counterparty risk is associated with transactions whose value can change over time depending on factors such as interest rates or exchange rates. A different exposure value can affect the counterparty's solvency and is crucial for the counterparty's ability to fulfil its obligations at the time of transaction settlement. The Bank determines the level of exposure based on the current valuation of contracts and the potential future change in exposure value, which depends on the type of transaction, the type of counterparty, and settlement dates.

As of the end of December 2024, the counterparty risk calculation included the following types of transactions: foreign exchange transactions, interest rate swaps, currency options, interest rate options, and commodity derivatives.

The assessment of counterparty credit risk for transactions generating counterparty risk is analogous to granting credit products. This means that these transactions are covered by limits whose value directly results from the assessment of Customers' creditworthiness, carried out similarly to the needs of offering credit products. The assessment also takes into account the specific nature of the transactions, especially their variable value over time, or their direct dependence on market parameters.

The rules for concluding foreign exchange transactions, derivative transactions, and granting, utilizing, and monitoring credit limits for transactions covered by counterparty risk limits are regulated by dedicated procedures. According to the adopted policy, the Bank concludes all transactions based on individually granted limits and takes into account its knowledge of the Customer. The Bank has defined product groups which are offered to Customers depending on their knowledge, experience, and risk tolerance. The Bank has transparent rules for securing counterparty risk exposure.

In connection with the armed conflict in Ukraine and the economic sanctions issued against Russia and Belarus, the Bank observes increased volatility of market risk parameters, which translates into fluctuations in exposure to counterparty risk. The Bank continuously assesses the counterparty risk, conducting reviews of the Customer portfolio where this risk occurs. The Bank maintains the application of its basic "Know Your Customer" principle.

ESG Risk

ESG risk management principles

As part of the Bank's risk identification and evaluation principles, a separate group of risk factors related to environmental, social, and governance factors was defined. In the process of identifying risks, the significant impact of ESG factors on credit risk was recognized. Given that ESG factors are not yet comprehensively covered within the quantitative measurement of credit risk, it was decided to separate ESG risk as a category of difficult to measure risk until ESG factors are included in credit parameters. As a result, the Bank included ESG risk in the internal risk management framework by recognizing ESG risk as a subtype of credit risk in the Risk Management Strategy and Risk Appetite. To limit and control the risk, principles for measuring ESG risk were also developed in the process of determining the Bank's internal capital (ICAAP). The capital plan for 2022-2025 was supplemented with limits to cover ESG risk, determined based on the

conducted risk measurement. ESG risk management principles were also developed, which include provisions on risk monitoring and reporting, and stress tests.

Factors considered in ESG risk analysis

Environmental factors:

- greenhouse gas emissions,
- energy consumption and efficiency,
- water, air, and soil pollution,
- effective management of water consumption (risk of freshwater shortage),
- soil degradation,
- deforestation,
- consumption of natural resources,
- waste management,
- biodiversity and ecosystem protection,
- risk of not transitioning to renewable energy sources,
- development in the field of low-emission technologies and other environmental technologies (transition risk),
- regulatory restrictions, including additional taxes and fees e.g., carbon tax (transition risk),
- physical risks related to climate change (extreme weather events and gradually deteriorating climatic conditions), including the effects of natural disasters that may result in, among others, a decrease in asset values,
- changes in consumer attitudes and preferences related to growing awareness of environmental risk,
- risk of financial liability for the negative impact of activities (compensation, penalties).

Social factors:

- social inclusion,
- supporting social cohesion,
- respect for diversity,
- protection of whistleblowers,



- investments in human and social capital,
- counteracting discrimination of any kind,
- combating inequality and promoting equal opportunities,
- safe and healthy work environment,
- Health and safety of Customers, local communities, surroundings,
- Protection of Customer privacy,
- training and development,
- disregard for human rights (forced labor, child labor, modern slavery),
- violation of labor rights: the right to associate, the right to strike, the right to collective agreements, ethical standards of employment,
- risk of lack of prevention against terrorism and cybercrime,
- infectious diseases (affecting humans or animals),
- financial liability risk for negative impact of operations (compensation, penalties).

Governance factors:

- unethical and unfair business practices,
- non-compliance with corporate governance standards (code of ethics, complaint and irregularity reporting mechanisms, transparency of information),
- gender diversity in corporate bodies,
- internal Audit,
- independence of the board,
- executive compensation,
- abuses and corrupt practices,
- shareholder rights,
- stakeholder engagement,
- faulty ESG risk control systems,

- supply chain requirements,
- compliance with non-financial sector regulations,
- financial liability risk for negative impact of operations (compensation, penalties).

The Bank recognizes that risks related to environmental protection, social policy and corporate governance can pose a significant risk to businesses and a systemic risk to the economy. In order to manage this risk, the Bank monitors the work of supervisory bodies and legislative proposals concerning the financial sector.

ESG analysis in the credit process

In 2021, in response to the requirements of the EBA/GL/2020/06 Guidelines of 29 May 2020 on loan origination and monitoring, the Bank developed ESG assessment questionnaires that have been implemented in the credit process for corporate, SME and micro-business Customers. The aim of the assessment is to identify any risks associated with ESG factors affecting Customers' financial situation, as well as the impact of Customers' business activities on ESG factors.

The Bank also uses a comprehensive assessment of the level of advancement of sustainable development practices among its Customers (ESG Assessment). The analysis is carried out based on questionnaires that comply with EU regulations in the field of sustainable development and focus on ESG factors relevant to a given industry. Thanks to the complexity of the analysed issues, the Bank:

- assesses the scale of Customers' engagement in key areas of their social and environmental impact,
- determines whether Customers are aware of sustainable development challenges, as well as the commitments and actions they undertake,
- monitors the progress in implementing ESG practices.

So far, the ESG Assessment process has included Strategic Customers. From 2024, the Bank also included lower Corporate Customer segments in the analysis.

The Bank also follows the Equator Principles (EP), which serve to identify, assess, and manage the risks associated with financing a given project and its impact on the natural environment and society. The Principles provide minimum standards for conducting project due diligence.

The Bank, like the entire BNP Paribas Group, also adheres to the following:

- **Ocean protection policy** which establishes criteria for financing activities deemed risky for the environment and oceanic biodiversity,
- **Human Rights Policy**, which sets ethical standards and ensures respect for human rights in all actions taken by the Bank.



Sector policies

The sector policies applied by the Bank identify nine sectors as particularly sensitive due to ESG risks. These are the coal energy, mining, oil and natural gas, nuclear, forest - pulp, forest - palm oil, tobacco, agri-food, defense and security sectors.

All entities operating in these sectors that wish to become a Bank Customer or obtain financing are obliged to fulfill the requirements described in the Bank's sector policies. At the same time, the Bank made a strategic decision to stop servicing the sectors most harmful in terms of sustainable development.

as of 2018

The Bank is implementing an exit process from tobacco financing. No new Customers from this sector will receive financing from the Bank

in 2020

The bank has tightened its policy towards Customers whose business involves thermal coal

from 2020

Bank to discontinue financing of fur farming sector

in 2023

The Bank has tightened its policy towards the oil and gas sector. The bank does not finance the development of new oil and gas fields

For more on sectoral policies, see Actions and resources in relation to climate change policies (E1-3) in the Sustainability Report chapter.

Table 66. Sectors for which the Bank has separate policies

Sector	The Bank's commitments
Coal energy sector	<ul style="list-style-type: none"> the Bank will not start cooperation with any new Customer who obtains more than 25% of its revenue from coal energy and coal-based activities. the Bank will only cooperate with coal energy companies that have a coal exit strategy by 2030, both for their owned and operated coal-fired power plants.

	<ul style="list-style-type: none"> the Bank will not provide financial products or services for new coal energy projects, regardless of their location, or for the modernization of existing coal power/heat plants aimed at extending their usage period or increasing their production capacity.
Mining sector	<ul style="list-style-type: none"> the Bank will not provide any financial products or services to infrastructure companies significantly involved in the coal energy industry. the Bank will not provide any financial products or services to entities belonging to mining groups that produce over 10 million tons of coal energy annually or obtain over 20% of their revenue from coal energy. the Bank will not provide any financial products or services for thermal coal or metallurgical coal mining projects.
Oil and gas sector	<ul style="list-style-type: none"> the Bank will not finance the development of new oil and gas deposits. the Bank does not provide financing for investments related to the exploration and extraction of oil and gas from unconventional deposits, nor for pipelines and export terminals primarily fueled by unconventional LNG. the Bank does not finance any oil and gas projects or infrastructure related to such projects in the Arctic and Amazon regions and the Esmeraldas province in Ecuador.
Nuclear sector	<ul style="list-style-type: none"> as a financial institution, the Bank can offer its products and financial services to government entities supporting businesses developing non-military nuclear energy. The Bank believes that for countries planning to develop nuclear energy or new power plants, as well as for the international community, it is not only necessary to act in accordance with safety requirements and population protection, but also to act with regard for environmental protection for future generations. through the application of the Sector Policy, the Bank wants to ensure that the projects it could finance are in line with the principles of monitoring and mitigating the social and environmental impact of the nuclear energy sector.
Forest sector - tree pulp	<ul style="list-style-type: none"> the Bank has noted that due to the process of tree pulp production, the heavy industry activity has a significant impact on the environment, pollution of water, soil and air, as well as on the health and safety of pulp mill workers and the surrounding communities. the Bank wants to support responsible producers who implement sustainable development practices in the tree pulp production sector.
Forest sector - palm oil	<ul style="list-style-type: none"> the Bank refrains from financing or investing in businesses that actively contribute to deforestation or violate the rights of local communities. the Bank wants to support responsible producers who implement sustainable development practices in the palm oil production sector.
Tobacco sector	<ul style="list-style-type: none"> the Bank is in the process of exiting financing for tobacco product manufacturers, as well as growers and wholesalers whose main business is related to tobacco.



Agri-food sector

- the Bank provides a wide range of financial products and services for the agri-food sector across the value chain. The Bank's partners are distinguished by a high level of responsibility, which is reflected in the commitment to feed people with healthy and safe products in a way that does not threaten food supplies for future generations.
- since 2021, the Bank has introduced new criteria for companies engaged in activities related to soy and beef in the Brazilian Amazon and Cerrado. The Bank will offer financial products or services exclusively to companies that have adopted a zero-deforestation strategy in their production and supply chains no later than 2025.
- for the Amazon, the Bank will not finance Customers producing or purchasing beef and soy from areas cleared or converted after 2008, in the case of Cerrado, in areas cleared or converted after January 1, 2020, in accordance with global standards.
- for all Customers, the Bank will require full traceability of beef and soy supply chains (direct and indirect) by 2025.
- the Bank encourages Customers to engage in transitioning to systems that include cage-free infrastructure for broilers and laying hens by 2025, and to implement the Responsible Minimum Standards of the FARMS Initiative by encouraging all poultry companies (broilers and laying hens) to adhere to a maximum stocking density of 30 kg/m².

Market risk (including interest rate risk in the trading book and currency risk)

The process of managing market risk in the Bank is divided into managing interest rate risk in the trading book and currency risk. The process is centralized, which means that all transactions exposing the Bank to the above-mentioned risks are transferred to the Financial Markets Division, which is the unit responsible for operational risk management within the granted limits. The unit responsible for measuring and monitoring the level of market risk is the Market and Counterparty Risk Department, organizationally separate up to the level of the Bank's Management Board from the units conducting activities exposing the Bank to risk. The key participants in the market risk management process are the Risk Management Committee, the Management Board and the Supervisory Board, which, within the competences and responsibilities set out in written regulations, grant and allocate amounts of market risk limits, the level of risk appetite and monitor their use and the compliance of the conducted activities with the adopted strategy.

In measuring market risk, the Bank uses, among other methods, the Value at Risk (VaR) method. This is the change in the market value of an asset component or asset portfolio under specific assumptions regarding market parameters, in a specified time period and with a given probability. It is assumed that VaR for currency risk monitoring purposes is determined with a 99% confidence level in a one-day time horizon. The VaR methodology is subject to at least an annual process of evaluating the quality of the implemented models, including by performing a test that involves comparing forecast values and values determined based on actual changes in risk factors, assuming a constant open position (historical verification or "back testing").

In addition to VaR, in the process of managing market risk, the Bank used a number of other measures, such as open position limits for a given risk factor, loss limits, the analysis of the results of stress tests, as well as gamma and vega limits for option instruments.

Interest rate risk in the trading book is the risk of adverse changes in the Bank's financial result or the value of the Bank's capital, due to one of the following reasons:

- differences in the timing of interest rate changes on the Bank's assets and the liabilities financing them (mismatch risk),
- differences in the base rates that form the basis for determining the interest rate on positions with the same revaluation term (basis risk),
- changes in market interest rates, which affect the fair value of the Bank's open positions (interest rate volatility risk).

Interest rate risk in the trading book has been classified as significant, while the economic capital allocated to this type of risk constitutes less than 1% of the Bank's total economic capital.

Exposures to interest rate risk were the main source of risk in the trading book. The Bank assesses this risk level as moderate. In addition to linear risk instruments, the Bank maintained a small open position in interest rate options to ensure the possibility of servicing Customer transactions at more favorable pricing conditions.

The following table shows the level of interest rate risk in the trading book in terms of Value at Risk with a 99% confidence level in a one-day time horizon, allowing to estimate the sensitivity of the Bank's result to changes in market interest rates, including in particular potential losses.

Table 67. The level of interest rate risk in the trading book in terms of Value at Risk with a 99% confidence level in a one-day time horizon

IR VaR (PLN thousand)	2024	2023
Medium	2,672	3,763
Maximum	4,266	7,060
Minimum	1,655	1,974

Foreign exchange risk is the risk of adverse changes to the Bank's financial result due to changes in market exchange rates.

The Bank conducts activities resulting in currency positions sensitive to changes in exchange rates. At the same time, it strives to limit exposure to foreign exchange risk arising from offering Customers products in foreign currencies. The Bank conducts limited activity on the foreign exchange market aimed at realizing the financial result from short-term arbitrage positions. In addition to instruments with linear risk characteristics, the Bank maintained a small open position in currency options to ensure the possibility of servicing Customer transactions at more favorable pricing conditions.

Foreign exchange risk has been classified as significant, while the economic capital allocated to this type of risk constitutes less than 1% of the Bank's total economic capital.



The following table presents the level of currency risk in terms of Value at Risk with a 99% confidence level in a one-day time horizon, allowing to estimate the sensitivity of the Bank's result to changes in market interest rates, including in particular potential losses.

Table 68. The level of foreign exchange risk in terms of Value at Risk with a 99% confidence level in a one-day time horizon

FX VaR (PLN thousand)	2024	2023
Medium	315	289
Maximum	1,600	1,838
Minimum	21	43

Interest rate risk in the banking book

The Group's core business activity - granting loans and accepting deposits from Customers - results in the creation of open interest rate risk positions, which are transferred from business lines to portfolios managed by the Asset and Liability Management Division through a transfer pricing system.

Structural elements (a stable part of current accounts insensitive to interest rate changes and capital) are hedged with transactions with longer maturities. The Group's intention for the remaining portfolio is to close the interest rate risk.

When defining the interest rate risk profile, the Group takes into account not only contractual parameters, but also the actual characteristics of products resulting from Customer behavioral behaviors and embedded options using models e.g., for current accounts, savings accounts, fixed-rate loans, credit cards.

Modeling product behavior divided into business lines allows for the separation of stable and unstable parts, responding in different ways to interest rate changes.

The Group's policy on interest rate risk defines the following basic types of interest rate risk analysis (combined and broken down into major currencies):

- mismatch in the revaluation terms of assets and liabilities in individual terms (so-called "gapping") for a banking portfolio,
- interest income sensitivity outlier test (SOT NII) in accordance with regulatory guidelines,
- outlier test for the economic value of capital (SOT EVE) in accordance with regulatory guidelines,
- sensitivity of interest income to defined - expected and crisis - scenarios of shifts in interest rate curves, assuming different scenarios of interest rate curves (EaR),
- the amount of interest income under defined scenarios of changing interest rate curves for the position effectively managed by the Asset and Liability Management Division (NII),
- sensitivity due to different reference rates (base risk),
- average duration of capital investment and non-interest bearing current accounts (so-called structural elements),
- sensitivity of fair value to parallel shift in interest rate curves by 1 basis point and to shift in interest rate curves by 1 basis point at a selected curve node,
- sensitivity of fair value, expressed in the form of notional amount of an annual transaction (position) with the same sensitivity (OYE).

The above analyses are a fundamental part of the system for limiting interest rate risk in the banking book. Individual analyses are carried out on a daily, monthly or quarterly basis. In addition, the Group conducts sensitivity analyses for extreme conditions for the banking portfolio, using significantly larger changes in interest rates than those usually observed (extreme condition tests).

The table below presents the interest rate gap for the banking portfolio as of December 31, 2024. The gap shows net revaluation amounts in individual time intervals for positions, broken down by product. The use of established limits is below the maximum values.

**Table 69. Interest rate gap**

PLN thousand	to 1 month	1-3 months	3-12 months	1-5 years	above 5 years	Total
Cash and Balances at Central Bank	11,325,551	-	-	-	-	11,325,551
Amounts due from banks	7,789,297	-	-	-	-	7,789,297
Loans granted to Customers	29,915,755	29,554,809	12,188,579	11,574,172	1,669,960	84,903,275
Securities	5,000,500	1,631,966	5,652,493	24,559,201	19,089,847	55,934,007
Other assets	581,726	146,114	327,215	1,734,959	821,567	3,611,581
Total assets	54,612,829	31,332,889	18,168,287	37,868,332	21,581,374	163,563,711
Amounts due to banks	(5,806,902)	(6,269,723)	(468,972)	(300,583)	(8,348)	(12,854,528)
Amounts due to Customers	(45,729,345)	(21,167,558)	(26,994,386)	(23,924,339)	(12,875,493)	(130,691,121)
Other loans	-	(650,000)	-	-	-	(650,000)
Capital	(1,828,788)	(309,232)	(1,391,543)	(7,421,564)	(3,710,782)	(14,661,909)
Other liabilities	(5,184,303)	(99,590)	(10,497)	(25,802)	(686)	(5,320,878)
Total liabilities	(58,549,338)	(28,496,103)	(28,865,398)	(31,672,288)	(16,595,309)	(164,178,436)
Net off-balance-sheet liabilities	(1,868,267)	(5,790,582)	4,815,875	5,824,250	(2,568,754)	412,522
Interest rate gap	(5,804,776)	(2,953,796)	(5,881,236)	12,020,294	2,417,311	(202,203)

The average investment period of capital and non-interest-bearing current accounts as of 31 December 2024 was 4.6 years.

The sensitivity of the interest result with shifts in interest rate curves largely depends on the share of non-interest-bearing and low-interest-bearing deposits in the total deposit base, assumptions about the behaviour of the volatile part of the deposit base and assumptions made about changes in the balance sheet structure.

Table 69 shows the sensitivity of interest income as at 31 December 2024 with an immediate 100 bps change in interest rates in all currencies over a 12-month horizon. The most likely assumption was made that there would be no shifts between non-interest-bearing current accounts and interest-bearing deposits resulting from high levels of interest rates in the PLN currency. In the sensitivity analysis of the interest result, an assumption was made about an increase/decrease in the business margin in the event of an increase/decrease in interest rates. A factor that has a significant impact on the sensitivity of interest income is the large proportion of non-interest-bearing current accounts, some of which, for prudential reasons, are hedged (from the point of view of interest rate risk) with short-term (0/N/1M) financial transactions. The impact of maturity mismatches between assets and liabilities on the sensitivity of the interest result is at a low level.

The increase in the sensitivity of net interest income at the end of 2024 is due to the increase in non-interest bearing account balances.

Table 70. Interest income sensitivity as of 31.12.2024

Change in interest rates (PLN million)	+100 bps	-100 bps.
For PLN	240	(243)
For all currencies combined	318	(322)

The Bank performs the supervisory outlier test of net interest income in the banking book (SOT NII) in full compliance with the guidelines of the EU Commission Delegated Regulation 2024/856 (the volatile part of deposits negatively affects the measure). The value of the measure as at 31 December 2024 was 4.47% of Tier1 capital and is below the applicable regulatory limit of 5% of Tier1 capital.



The supervisory outlier test for the Group's economic value of capital (SOT EVE) (the change in fair value of the Group's assets and liabilities excluding own funds, at internal prices, with assumed changes in interest rate curves) remains materially below the regulatory limit of 15% of Tier1 capital. At the end of December 2024, the maximum SOT EVE was - 6.26%.

As at 31 December 2024, the Group applies hedge accounting:

- macro fair value hedge - the hedged risk is interest rate risk, in particular changes in the fair value of fixed-rate assets and liabilities, due to changes in certain reference rates. The hedged items are current accounts with a fixed interest rate in PLN, EUR and USD. The hedging instruments are standard interest rate swap (IRS) transactions, so-called plain vanilla IRS in PLN, EUR and USD, under which the Bank receives a fixed interest rate and pays a variable rate based on WIBOR 6M, WIBOR 3M, EURIBOR 6M, EURIBOR 3M, EUR ESTR, USD SOFR rates.
- macro fair value hedge - the hedged risk is interest rate risk, in particular changes in the fair value of fixed-rate assets and liabilities, due to changes in a certain reference rate. The hedged items are fixed-rate loans in PLN currency. The hedging instruments are standard interest rate swap (IRS) transactions, so-called plain vanilla IRS in PLN, under which the Bank pays a fixed interest rate and receives a variable rate based on rate WIBOR 3M.
- micro fair value hedge - the hedged risk is interest rate risk, in particular changes in the fair value of fixed-rate assets and liabilities, due to changes in a certain reference rate. The hedged items are fixed-coupon bonds in EUR and USD currencies. The hedging instruments are standard interest rate swap (IRS) transactions, so-called plain vanilla IRS in EUR and USD, under which the Bank pays a fixed interest rate and receives a variable rate based on EUR ESTR and USD SOFR rates.
- cash-flow hedge - The hedged risk is interest rate risk, in particular the lack of variability of interest flows on the hedged paper, caused by changes in a certain reference rate. The hedged items are: variable-coupon bonds WZ1131. The hedging instruments are standard interest rate swap (IRS) transactions, so-called plain vanilla IRS in PLN, under which the Bank receives a fixed interest rate and pays a variable rate based on the WIBOR 6M rate.

The war in Ukraine has essentially not affected the way interest rate risk is managed in the banking portfolio.

Liquidity risk

Liquidity risk is defined as the risk of the Bank losing the ability to meet its financial obligations, where liquidity is defined as the ability to:

- financing assets and meeting obligations on time in the course of the Bank's normal operations or under other conditions, without incurring a loss, where - given that maintaining liquidity is a priority for the Bank - optimizing liquidity costs is a factor considered last,
- obtaining alternative and supplementary funds to those currently held, in case of their non-renewal and/or early withdrawal, to meet the current or potential demand for funds from current depositors, to cover lending actions and other potential liabilities associated with, among others, settlement of derivative transactions or securities established by the Bank,

- generating a positive cash flow balance by the Bank over a certain time horizon, regardless of macroeconomic developments, the implementation of business plans, and changes in the regulatory environment.

The Bank operates in an environment based on free market rules as a participant in the financial market, in particular the retail, corporate and interbank markets. This means a wide spectrum of possibilities for regulating the level of liquidity, but at the same time makes the Bank sensitive to crises in any of these environments. The Bank has an automated risk monitoring system that allows daily information to be obtained about the current level of future liquidity risk and online information about the level of intraday liquidity risk.

The Bank distinguishes the following types of liquidity:

- immediate (intraday) liquidity - during the current day,
- future liquidity - in the period beyond the current day, with an additional breakdown into:
- current liquidity - in a period up to 7 days,
- short-term liquidity - in a period longer than 7 days up to 1 month,
- medium and long-term liquidity - in a period longer than 1 month.

The Bank defines liquidity risk as the risk of losing its ability to:

- settle payment obligations on time,
- obtain alternative and supplementary funds to those currently held,
- generate a positive cash flow balance over a certain time horizon.

The Bank's policy in terms of liquidity risk management involves:

- balanced, organic balance sheet growth (asset growth must be linked to a corresponding increase in financing these assets with stable liabilities) and off-balance-sheet transactions and liabilities;
- limiting the Bank's dependence on volatility of external conditions and ensuring that in a crisis situation - local, global, or directly affecting the Bank - the Bank will be able to meet its obligations in the short term without limiting the spectrum of services provided and initiating changes in the basic business profile. In the case of a longer-term crisis situation, the Bank's policy assumes maintaining liquidity, but allows for changes in development directions and the introduction of costly processes to change the business profile;
- actively reducing the likelihood of adverse events that may affect the Bank's liquidity situation. This applies in particular to events that may affect reputation risk. In such a case, the Bank will take action to restore the trust of Customers and financial institutions as quickly as possible;
- ensuring high-quality standards for liquidity management processes. Activities aimed at improving the quality of liquidity management processes are of the highest priority in the Bank.



The main sources of funding are liabilities to Customers, supplemented by medium and long-term received credit lines and capital. Medium- and long-term received credit lines, taking into account subordinated loans and funds obtained in the securitization process of the loan portfolio, mainly come from the BNP Paribas group, as well as the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB), the Council of Europe Development Bank (CEB) and other financial institutions. The Bank's policy also allows for other sources of financing, such as the issuance of own debt securities or structured transactions.

Loan financing structure

The Group limits financing risk, which is associated with the threat of having insufficient stable sources of financing in the medium and long term and the need to incur an unacceptable level of losses.

The Bank mainly finances loans using funds collected by Customers in the form of current and term deposits, striving to maintain a stable relationship between these positions, and funds collected on the accounts of non-banking financial institutions, as shown in the table below:

Table 71. The structure of the Group's loan portfolio financing

PLN million	31.12.2024	31.12.2023
Net loans	85,854	86,248
Total sources of funding	144,340	140,570
Customer deposits, including:	130,925	127,175
- Retail Customers	55,184	50,355
- Corporate Customers	66,970	68,902
- Non-banking financial institutions	5,434	5,529
- Public sector institutions	3,336	2,388
Amounts due to banks *	13,415	13,395
Debt securities issued	-	-

* Including subordinated liabilities related to the BNP Paribas Group

At the end of 2024, compared to the end of 2023, the amount of wholesale funding received from the BNP Paribas Group increased by EUR 100 million and decreased by the partially repaid subordinated debt of PLN 340 million. At the end of 2024, the Bank issued own bonds in the amount of PLN 650 million as an AT1 instrument included in the Bank's capital at year-end.

The Bank finances its loans in foreign currencies with deposits accepted from Customers using, where necessary, foreign exchange transactions. If necessary, the Bank may use funds from medium and long-term loans from the BNP Paribas Group, which provides stable funding to cover shortfalls in currencies: EUR, USD, CHF. At the end of 2024, the CHF

mortgage portfolio, in the part not covered by the provisions made, was financed by a subordinated loan from the BNP Group and by Customer deposits in CHF.

As at 31 December 2024, the structure of the Group's committed long-term credit facilities was as follows:

Table 72. Structure of loans from the BNP Paribas Group in original currency

PLN million	31.12.2024	31.12.2023
CHF	150	150
EUR	1,591	1,334
PLN	6,336	6,597

Table 73. Structure of loans from the EBRD, EIB and CEB

PLN million	31.12.2024	31.12.2023
PLN	1,003	852
EUR	10	14

The net liquidity coverage ratio (LCR) for the Group was 238.4% at the end of 2024, a decrease of 0.7 p.p. compared with the end of 2023 (239.1%). LCR measures were maintained at similar levels during the year.

The Net Stable Funding Ratio (NSFR) for the Bank stood at 162.1% at the end of 2024 and 159.8% for the Group, representing an increase over the end of 2023 of 6.1 p.p. and 7.0 p.p. respectively. The recorded increase in the ratio is due to an increase in long-term funding (MREL), stable growth in the deposit base of non-financial Customers and no growth in the loan portfolio.

The ongoing war in Ukraine did not affect the Bank's overall liquidity situation. Maintaining high NBP interest rates in 2024 and macroeconomic factors (e.g., gradually declining inflation but with continued uncertainty, moderate pace of economic growth, wage pressure) translated into lower demand for loans among Customers and lower loan sales in 2024.



Operational risk

The Bank defines operational risk, in accordance with the requirements of the Polish Financial Supervision Authority included in Recommendation M, as the risk of suffering a loss caused by inappropriate or failed internal processes, people, technical systems or the influence of external factors. This term includes legal risk, but does not cover strategic risk. The Bank also recognizes the consequences of materializing compliance risk as operational risk events and losses. Operational risk accompanies every type of banking activity. The Bank identifies operational risk as permanently significant.

Goals of operational risk management

The Bank's goals in operational risk management are, in particular, to maintain a high standard of operational risk management, ensuring the security of Customer deposits, bank capital, stability of the Bank's financial result, and keeping operational risk within the accepted operational risk appetite and tolerance. The basic measure used to assess risk within the accepted operational risk appetite is the indicator of operational losses recorded by the Bank over a given period of time. In developing the operational risk management system, the Bank follows legal requirements, including in particular the recommendations and resolutions of the national financial supervision and the standards of the BNP Paribas group.

Operational risk management strategy and policy

The operational risk management strategy is described in the document "Operational Risk Management and Internal Control Strategy at BNP Paribas Bank Polska S.A." approved by the Bank's Management Board and accepted by the Supervisory Board. The Strategy is reviewed at least once a year, and the results of the review are reported to the Bank's Supervisory Board by the Bank's Management Board. Changes to the Strategy require the acceptance of the Supervisory Board, which assesses the implementation of the Strategy's assumptions and its compliance at least once a year.

The priority of the Strategy is to ensure that the Bank achieves its business objectives in a safe manner, accepting a level of risk only within the accepted risk appetite, eliminating unacceptable events, limiting the possibility of unexpected events with severe consequences for the Bank, and actively responding and addressing identified events that could cause such consequences. Achieving the above priority also includes promoting an appropriate operational risk management culture within the Bank. The objectives of the Strategy, which the Bank implemented in 2024, related to activities reducing the risk of abuse, including cybercrime, as well as mitigating the materialization of other risks and optimizing the internal control environment.

The Bank's Management Board is regularly informed about the scale and types of operational risk to which the Bank is exposed, its effects, and methods of operational risk management. In particular, both the Bank's Management Board and the Supervisory Board are regularly informed about the shaping of operational risk appetite measures defined in the Operational Risk Management Strategy.

The Operational risk management strategy also includes the Bank's subsidiaries. According to supervisory regulations, the Bank supervises the operational risk associated with the activities of its subsidiaries. Operational risk management in subsidiaries is carried out within the framework of dedicated units/people appointed for this purpose. The way and methods of managing operational risk in subsidiaries are organized adequately to the scope of the entity's operation and the profile of its activity, in accordance with the principles applicable in the Bank.

The organizational framework and standards for operational risk management are defined in the "Operational Risk Policy of BNP Paribas Bank Polska S.A.", adopted by the Bank's Risk Management Committee. According to the "Operational Risk Policy of BNP Paribas Bank Polska S.A.", the operational risk management processes include, among others:

- identification and assessment of operational risk. Including gathering information about operational events, assessing risk in processes and products, and determining key risk indicators,
- setting the appetite and limits for operational risk at the level of the entire Bank and individual business areas, analysis of operational risk and its monitoring and ongoing control,
- counteracting an elevated level of operational risk, including risk transfer.

Operational risk management organization

The Bank maintains and develops an operational risk management system that comprehensively integrates the management of individual types of operational risk in all areas of the Bank's activity. The aim of the operational risk management system is to ensure the safety of the Bank's operational activity by implementing effective mechanisms for identifying, assessing and quantifying, monitoring, controlling, reporting, and taking actions to limit operational risk. These actions take into account structures, processes, resources, and scopes of responsibility at various organizational levels of the Bank.

The Bank precisely defines the division of responsibilities for operational risk management, which is adapted to its organizational structure. The operational risk management process is carried out within three lines of defense. The first line of defense is the management of risk in the Bank's operational activity. The second line of defense consists, in particular, of risk management by employees specifically appointed to this organizational units, independently of risk management on the first line of defense and the compliance unit's activity. The third line of defense consists of the internal audit unit's activity.

As part of the second line of defense, comprehensive supervision over the organization of standards and methods of operational risk management is exercised by the Operational Risk, Internal Control and Anti-Fraud Division operating within the Risk area. The Division's responsibilities include, among others, issues related to operational risk management, combating abuses against the Bank, and supervision of internal control, including control of personal data protection processes.

The determination and implementation of the Bank's strategy regarding insurance as a method of risk limitation is the competence of the Real Estate and Administration Department. On the other hand, continuity management, including issues related to continuity plans ensuring continuous and undisturbed operation of the Bank and emergency plans ensuring the possibility of conducting the Bank's current operations, is the responsibility of the Security and Continuity Management Division.

As part of legal risk management, the Legal Division monitors, identifies, and analyses changes in common law, their impact on the Bank's operations, and court and administrative proceedings concerning the Bank. The Compliance



Monitoring Department is responsible for the ongoing examination of the risk of non-compliance and the development and improvement of adequate control techniques.

Other significant areas of operational risk management also include:

- HR risk management,
- risk management of entrusting tasks to external entities (outsourcing risk),
- model risk management,
- IT systems risk management and cyber-security (ICT risk) management),
- conduct risk management,

for which risk management policies and procedures are defined - in accordance with the scope of competences - by designated organizational units of the Bank.

The Bank periodically verifies the functioning of the implemented operational risk management system and its adequacy to the current risk profile of the Bank. Reviews of the organization of the operational risk management system are carried out as part of regular control by the Internal Audit Division, which does not directly participate in the operational risk management process, but provides a professional and independent opinion, supporting the achievement of the Bank's goals.

Supervision over the control of the operational risk management system is exercised by the Bank's Supervisory Board, which assesses its adequacy and effectiveness.

Risk identification and assessment tools

The Bank places particular emphasis on the processes of identifying and assessing the causes of current exposure to operational risk within banking products. The Bank aims to reduce the level of operational risk by improving internal processes and also to limit the operational risk associated with the introduction of new products and services, and outsourcing).

According to the "Operational Risk Policy of BNP Paribas Bank Polska S.A.", operational risk analysis aims to understand the relationships between the factors generating this risk and the types of operational events, and its most important result is the determination of the operational risk profile.

The Bank manages operational risk using, among others, the following tools:

USED TOOLS	MAIN PURPOSE OF TOOL APPLICATION
OPERATIONAL RISK EVENT REGISTRATION	<ul style="list-style-type: none"> • Effective analysis and monitoring of operational risk • Responding to disclosed vulnerabilities to operational risk

USED TOOLS	MAIN PURPOSE OF TOOL APPLICATION
SELF-ASSESSMENT OF OPERATIONAL RISK AND CONTROL (RCSA)	<ul style="list-style-type: none"> • Building awareness about operational risk • Identification of operational risk, determination of threats and identification of their sources, as well as determination of the size and potential consequences of threats • Evaluation of control mechanisms used to limit identified threats • Improving processes and reducing identified operational risks • Ensuring adequate risk control in processes exposed to operational risk
OPERATIONAL RISK SCENARIO ANALYSIS (SA)	<ul style="list-style-type: none"> • Identifying events characterized by low frequency but high losses • Assessing the impact of possible extreme events on the Bank's operations by estimating the probability of occurrence and the anticipated severity of the scenarios under consideration • Raising the Bank's awareness by providing information about possible operational risk scenarios • Supporting the process of creating action plans for identified risks
KEY RISK INDICATORS (KRI)	<ul style="list-style-type: none"> • Continuous monitoring and reporting of exposure to operational risk • Providing warning signals about the functioning and exposure to operational risk of processes and areas of the Bank's activities • Monitoring changes in risk level over time
RISK ASSESSMENT OF ONGOING PROJECTS	<ul style="list-style-type: none"> • Identification and assessment of operational risk associated with projects undertaken by the Bank, including implemented or modified products • Independent verification and checking by the second line of defense of the correctness of risk identification and limitation by the first line of defense units • Recommending actions to reduce risk
OPERATIONAL RISK IDENTIFICATION FOR CONTRACTS WITH EXTERNAL SUPPLIERS (OUTSOURCING)	<ul style="list-style-type: none"> • Ensuring proper identification and assessment, control and monitoring, and mitigation of operational risk • Ensuring compliance with regulatory requirements regarding the process of outsourcing tasks by the Bank to external suppliers
OPERATIONAL RISK REPORTING	<ul style="list-style-type: none"> • Providing current and periodic, management-tailored information on operational risk: to the Bank's Management Board, Committees responsible for risk management, Supervisory Board, and other members of the Bank's management, according to the scope of responsibility • Allowing for the assessment of the Bank's exposure to operational risk and the effectiveness of its management



USED TOOLS

MAIN PURPOSE OF TOOL APPLICATION

- Disclosure of information about operational risk in accordance with Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on the conditions for the admission of credit institutions to business and prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC, as amended (CRD IV Directive) and the standards required by the institutions supervising the Bank's activities.

The operational risk profile is an assessment of the level of significance of this risk, understood as the scale and structure of exposure to operational risk, determining the degree of exposure to this risk (i.e., operational losses), expressed in dimensions of structure and scale chosen by the Bank. The periodic evaluation and review of the Bank's operational risk profile are conducted based on an analysis of the Bank's current risk parameters, changes and risks occurring in the Bank's environment, the implementation of business strategy, as well as an assessment of the adequacy of the organizational structure and the effectiveness of the risk management system and internal control functioning in the Bank.

In accordance with the applicable regulations, the Bank sets regulatory capital to cover operational risk. For calculations, the Bank used the standard method (STA). For entities dependent on the Bank, in a consolidated perspective, the requirements relating to these entities are determined using the Basic Indicator Approach (BIA).

Operational risk control and monitoring

The purpose of internal control is effective risk control, including preventing the emergence of risk or its early detection. The role of the internal control system is to achieve the general and specific objectives of the internal control system, which should be taken into account when designing control mechanisms. The principles of the internal control system have been defined in the "Policy on Internal Control in BNP Paribas Bank Polska S.A.", approved by the Bank's Management Board. This document defines the main principles, organizational framework, and standards for the functioning of the Bank's control environment, maintaining compliance with the requirements of the PFSA as defined in Recommendation H. Detailed internal regulations related to specific areas of the Bank's operations are adapted to the specifics of the Bank's operations. The appropriate organizational units of the Bank are responsible for developing detailed regulations relating to the area of internal control, in accordance with the scope of tasks assigned to them.

The Bank's internal control system is based on the 3 lines of defense model.

The Bank ensures the exercise of internal control through independent monitoring of compliance with control mechanisms, including ongoing verification and testing.

Limiting operational risk

In 2024, the Bank undertook and continued a number of actions limiting operational risk and strengthening the control mechanisms and processes over this type of risk. In particular, processes and tools for countering and combating abuse to

the Bank's detriment were strengthened, including, among others, combating credit abuse and cybercrime. The Bank continued a program to reduce the risk of abuse. The Bank constantly monitored exposure to legal risk, including the risk arising from ongoing court cases related to CHF-denominated loans, in order to adequately respond to changes in the level of risk.

The effectiveness of the solutions implemented by the Bank is periodically informed, in particular, to the Bank's Management Board and the Risk Committee at the Supervisory Board.

Risks arising from the war in Ukraine

In terms of operational risk management, the Bank continuously analyses risks associated with the consequences of military actions in Ukraine (including in particular cyber or physical attacks aimed at payment or banking infrastructure that could cause disruptions to operational continuity) and takes appropriate actions to ensure the safety of both employees and Bank Customers, as well as to ensure the uninterrupted implementation of processes related to the conducted activity.

Compliance Risk

The Bank defines compliance risk as the risk of adverse effects, including legal and regulatory sanctions, financial penalties, and reputation loss, in connection with the Bank's non-compliance with laws, supervisory standards and recommendations, ethical and market standards, and internal regulations applicable in the Bank.

Compliance assurance system

The compliance assurance system consists of organizational solutions, processes, and control mechanisms aimed at ensuring the Bank's compliance with laws, internal regulations, and market standards. This system operates within the internal control system and is implemented on three lines of defense:

- first line of defense includes all organizational units responsible for the Bank's operational functioning. These units are obliged to comply with internal regulations, apply the control mechanisms and compliance risk control mechanisms established in the Bank, and ensure independent horizontal monitoring of compliance with control mechanisms aimed at ensuring compliance,
- second line of defense consists of managing compliance risk by independent organizational units appointed for this purpose - the Compliance Monitoring Division responsible for implementing the compliance risk management process and other organizational units of the Bank responsible for ensuring compliance in their areas of competence (e.g., risk monitoring cells, legal cell, and regulatory inspectors for brokerage and custody activities),
- third line of defense includes the activity of internal audit responsible for examining the adequacy and effectiveness of the internal control system.



The Compliance Monitoring Division assists, in terms of compliance risk, the Bank's Management Board in introducing and ensuring the operation of an adequate and effective internal control system and the Supervisory Board in supervising its introduction.

The manner of organisation and operation of the compliance system at the Bank, including the rules of compliance risk management, is governed by the Compliance Policy at BNP Paribas Bank Polska S.A. (the Policy). All employees of the Bank are obliged to comply with the law, internal regulations and market standards adopted by the Bank. The conduct of employees should be consistent with the provisions of the Policy and the BNP Paribas Group Code of Conduct. In order to strengthen the Bank's compliance culture, the Compliance Division ensures training of the Bank's employees in the scope covered by the Policy, according to the reported needs and as part of training for newly hired employees.

Role of the Compliance Unit

The Bank has a separate, independent compliance unit - the Compliance Monitoring Division. The activity of this unit aims to implement the process of managing the risk of non-compliance i.e., introducing solutions that allow for the identification, assessment, control and monitoring of this risk. This unit is also responsible for reporting in this area to the Bank's Management Board and the Supervisory Board, including the Audit Committee.

As part of the compliance assurance system, the activities of the Compliance Monitoring Division also include: designing and implementing internal regulations, consulting, conducting explanatory proceedings, shaping compliance risk control mechanisms, vertical ongoing verifications, and vertical and horizontal testing of the effectiveness of control mechanisms ensuring the Bank's compliance with laws, internal regulations and market standards, including their adherence by the Bank's first line of internal control defense, with particular emphasis on the following areas:

- counteracting money laundering and terrorist financing,
- compliance with international embargoes and sanctions,
- protection of Customer interests,
- professional ethics and anti-corruption,

- conducting on financial markets,
- counteracting market manipulations and the use of confidential information,
- managing conflicts of interest,
- compliance by the Bank and its Customers with regulations on tax avoidance and those related to financial markets, with a transnational scope. Appropriate mechanisms have been implemented in the Bank to ensure the independence of the compliance unit and to enable it to perform its assigned tasks.

As part of the Bank's organizational structure, the Director of the Compliance Monitoring Division reports directly to the President of the Bank's Management Board, and the regulations governing the operation of this Division and the necessary mechanisms to ensure its independence are approved by the Bank's Supervisory Board. Furthermore, there is a special procedure in the Bank for appointing and dismissing the person leading the compliance unit, and necessary rules are in place to protect the employees of this unit from unjustified termination of employment.

Actions to mitigate compliance risk

The Bank invariably improves its processes to ensure the effectiveness of the compliance risk management system. In 2024, the Bank has implemented/continued solutions including but not limited to the following:

- Optimisation of AML and sanctions monitoring processes by replacing manual activities with a robot,
- Alignment of the Whistleblowing Policy at BNP Paribas Bank Polska S.A. (Whistleblowing) to the Act of 14 June 2024 on the protection of whistleblowers,
- regulate in policies and procedures the responsibilities of the AMLRO (AML/CFT inspector), in line with regulatory expectations,
- developing the knowledge and awareness of the Bank's employees on compliance risk and ethical standards through the implementation of numerous educational programmes in the areas of the Compliance Division's activities.



Sustainability Statement

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Introduction

The following chapter presents information on the sustainability (Sustainability reporting hereafter referred to as the Sustainability Statement) of the BNP Paribas Bank Polska S.A. Capital Group in accordance with the information requirements under the amended Accounting Act (as a result of the transposition of the Corporate Sustainability Reporting Directive (CSRD), Directive of the European Parliament and of the Council (EU) 2022/2464 of 14 December 2022 and the European Sustainability Reporting Standards (ESRS).

Sustainability reporting requires a description of all material impacts, risks and opportunities, their integration into the Group's strategy, governance, action plans, measures and targets. The Group conducted this analysis and assessed the four material topics detailed in this report: climate change, own workforce, consumers and end-users, business conduct and entity-specific disclosures including market integrity, financial security and cybersecurity.

The following definitions are used in this Sustainability Statement :

- the Bank - BNP Paribas Bank Polska S.A.
- the Group - BNP Paribas Bank Polska S.A. Group
- the BNP Paribas Group - the international banking group BNP Paribas, which is the strategic shareholder of the Bank

Disclaimer

Despite the changes in the standardisation of methodologies for quantitative analyses of ESG factors and their impact on traditional financial risks in recent years, they should be interpreted with caution in light of their limitations.

The quantitative information presented in this report should be read in conjunction with the methodologies and definitions used in the accompanying narrative.

The Group gradually adapts its methodologies, taking into account developments in knowledge, data availability and the creation or updating of recognised databases / data sources and standards.

General Disclosures (ESRS 2)

Basis for preparation

General basis for preparation of sustainability statement (BP-1)

BNP Paribas Bank Polska S.A. Capital Group prepares its sustainability statement on a consolidated basis.

Information presented in the Sustainability Statement relate to the period from 1 January to 31 December 2024, unless otherwise specified in the report. Sustainability Statement presents the information on the operations and the financial data as well as the sustainability information of the BNP Paribas Bank Polska S.A. Capital Group which includes BNP Paribas Bank Polska S.A., as a parent entity as well as entities within the BNP Paribas Bank Polska S.A. Capital Group as at 31 December 2024. It includes the following entities:

- BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A.
- BNP Paribas Leasing Services Sp. z o.o.
- BNP Paribas Group Service Center S.A.

The scope of consolidation is the same as the Consolidated Financial Statement of the BNP Paribas Bank Polska S.A. Capital Group for the year ended 31 December 2024.

No subsidiary exceeds the thresholds specified by the Polish Accounting Act and is not required to prepare its own sustainability statement in accordance with the ESRS.

The Sustainability Statement covers the Group's entire value chain, where indicated, i.e. its own operations, as well as the upstream and downstream value chains. The Group's value chain is described in this chapter under [Strategy, business model and value chain \(SBM-1\)](#) section.

Governance

The role of the administrative, management and supervisory bodies (GOV-1, GOV-2)

Management structure of sustainable development aspects

From 2022 in the Bank functions Sustainable Development Area, with the Chief Sustainability Officer (CSO) as Executive Director. The CSO acts as the main coordinator of sustainability issues in the organisation, heads the Sustainability Council and reports on ESG issues directly to the CEO, who oversees the implementation of the strategic integration of sustainability aspects into the organisation's activities. The main tasks of the Sustainable Development Area include developing and coordinating the implementation of the Bank's sustainability strategy, as well as initiating, implementing and reporting on sustainability-related initiatives, projects and programmes. The sustainability strategy is an integral part of the Group's strategy, hence a number of organisational units in the Bank and its subsidiaries are involved in its implementation.

The Management Board is kept informed on sustainability issues, including the impacts, risks and opportunities associated with them, through the committees operating within the Bank and the business units within the scope of their responsibilities.

Within the competences of a number of the Bank's collegiate bodies - the Credit Committee, the Internal Control Committee, the Risk Management Committee, the Retail Banking/Personal Finance Risk Committee, the Ethics and Standards of Conduct Committee - specific sustainability issues (including risks) are provided for reporting. A Sustainability Council has been established as an advisory body to comprehensively monitor ESG issues in various aspects of the Bank's activities and at various organisational levels, discussing the assumptions of the Strategy, in particular the Bank's ESG plans and declarations.

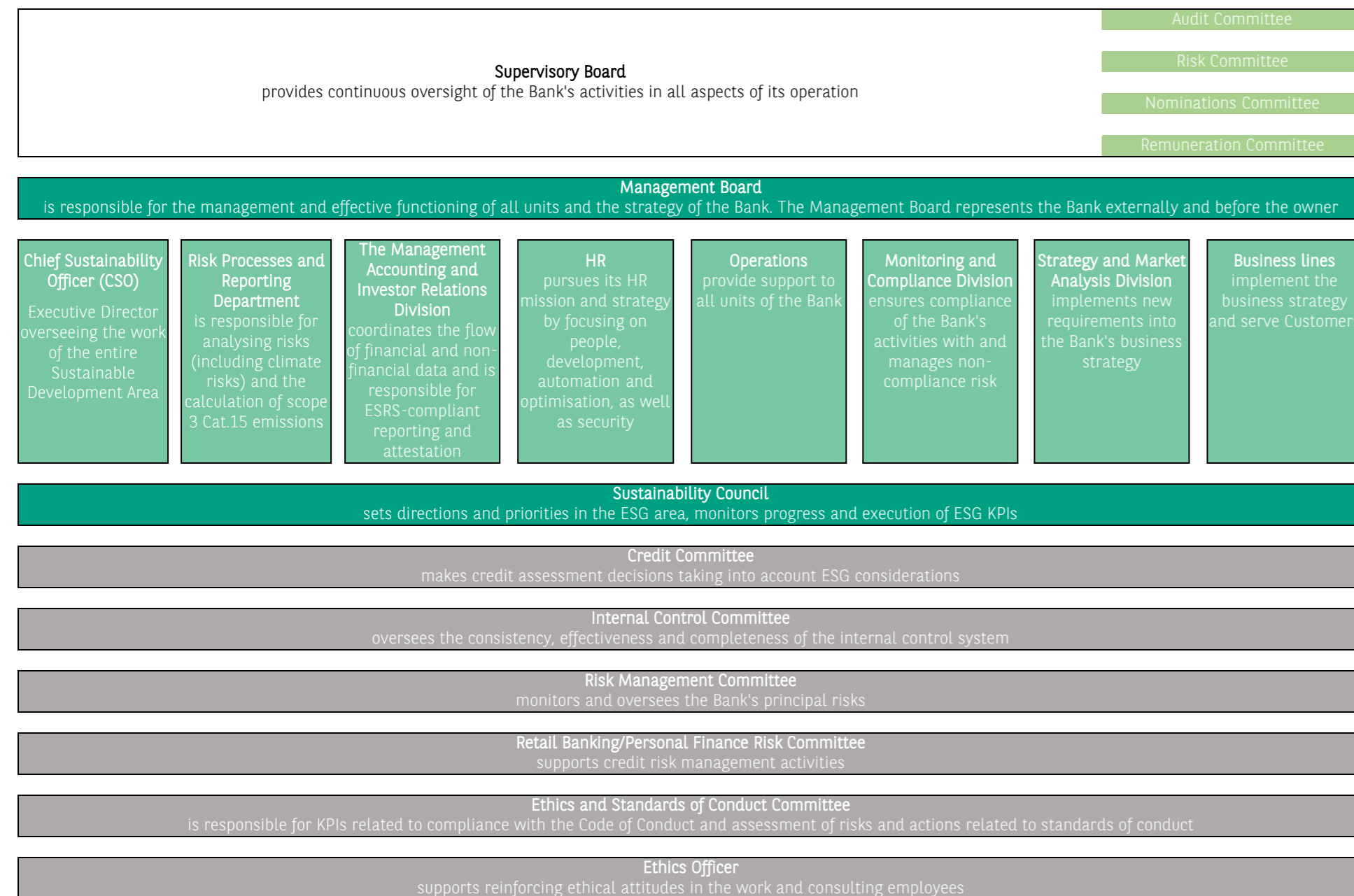
Sustainability issues are of interest to the Supervisory Board, which oversees the Bank's activities, including the implementation of the sustainability strategy, which is implemented by the Bank's Management Board as the main



governing body of BNP Paribas Bank Polska. There are Supervisory Board committees with decision-making powers on specific aspects deemed to be related to, among other things, sustainable development, described in the further part of this chapter.

The Bank has the competence to carry out double materiality analysis, however at the date of publication of the report, there is no formal process for mapping the competencies in place or under development in the Group to the current impacts, risks and opportunities (IROs) identified during the materiality assessment process.

Group sustainability management structure in 2024.



Management and supervisory bodies and the information provided to them related to sustainable development

Management Board

The Management Board is a main body responsible for management of the BNP Paribas Bank Polska S.A. It is responsible for the implementation of the strategy based on the long term vision, considering the sustainable development and acting in an interest of the Group and its stakeholders, especially the shareholders and investors. It defines the directions of the operations of the Group and assures that their goals are executed by the top and lower level management, in line with its social interest, considering the environment and governance matters.

The role of the Bank's Management Board and other bodies is described in detail in the Bank's Articles of Association, which is available at the [Bank's website](#) and in the [Corporate governance](#) in this Management Board Report of the Group.

The organisation of the Bank's risk management system (described in more detail in the chapter [Material impacts, risks and opportunities and their interaction with strategy and business model \(SBM-3\)](#)) primarily takes into account the role of the Bank's Management Board, Supervisory Board, dedicated committees (Audit Committee and Risk Committee at Supervisory Board level), as well as those of the Assets and Liabilities Committee (ALCO), Risk Management Committee, Retail Banking Risk Committee, Personal Finance Risk Committee, Credit Committee, Problem Assets Committee, Compliance Committee, and Internal Control Committee. The Management Board also includes the Risk Management Committee, the Retail Banking Risk Committee, the Personal Finance Risk Committee, the Credit Committee, the Problem Asset Lending Committee, the Product, Services and Activities Approval Committee (TAC/NAC Committee) and the Internal Control Committee, the Risk Area, the Finance Area, the Compliance Division and the Legal Division.

Composition and diversity of the Bank's Management Board as at 31 December 2024:

- the Management Board consists of eight Board Members;
- percentage of women is 37.5% (three female and five male members);
- three nationalities were represented (Polish, Belgian and Ukrainian).

All Management Board members have expertise in sustainability in relation to the implementation of the strategy, which applies cross-cuttingly to all areas overseen by them.

The progress of the sustainability strategy is presented quarterly to the Management Board and Supervisory Board by the Executive Director of the Sustainability Area.

The Bank's Management Board meets weekly, or more frequently if circumstances or the Group's interests require so, and among the topics discussed are those relating to the sustainability impacts, risks and opportunities. It has discussed sustainability issues 32 times in 2024, addressing the topics including:

- status and implementation plan for the Bank's CSRD and the Double Materiality Assessment (DMA) process - in 2024, the Management Board reviewed the process and methodology applied to conduct the DMA and adopted a resolution to



approve the results of the double materiality assessment, which defines the scope of annual sustainability reporting by key topics as required by the ESRS;

- climate issues, e.g. financing the energy transition, classification of the sustainable financing portfolio, results of the portfolio and proprietary activity carbon analysis, efforts to develop the Bank's approach to decarbonisation;
- ESG risk, greenwashing risk;
- the Bank's strategy for ESG-related services;
- human resources, e.g. equality and inclusion, salaries;
- corporate governance, e.g. key indicators for compliance with ethics and standards of conduct, whistleblowing policy.

Supervisory Board

The Supervisory Board has continuous oversight of the Bank's activities in all aspects of its operation. The Supervisory Board approved the Group's strategy (which includes the sustainability strategy). It also approves the strategic objectives and certain policies related to sustainability issues. It is also responsible for verifying that the members of the Management Board and executive directors have met the ESG criteria on which part of their variable annual remuneration depends. Supervisory Board also monitors the work of the Management Board in achieving its objectives.

The committees of the Supervisory Board (Audit, Risk, Remuneration and Nomination), consisting of members of the Supervisory Board, have a consultative and advisory function for the Board and are intended to improve its work.

Composition and diversity of the Supervisory Board as at 31 December 2024:

- The Supervisory Board consists of 11 people;
- The percentage of women is 45.5% (five female and six male members);
- Three nationalities were represented (Polish, French and Belgian);
- 45.5% of independent members, in accordance with the independence criteria.

More information regarding Supervisory Board included in the Governance Statement chapter, Supervisory Board section.

Audit Committee supports the Supervisory Board with regard to, among other things, monitoring the integrity of financial information and carrying out auditing activities involving non-financial information published by the Bank. The Audit Committee is also tasked with ensuring the information flow and good cooperation between the external auditor (statutory auditor), internal audit and the Supervisory Board.

In 2024, the Audit Committee approved the 2023 Report on Non-Financial Information of the BNP Paribas Bank Polska S.A. Group and reviewed the independent verification of the Report on ESG data. The Audit Committee monitored the implementation of the CSRD at the Bank, was informed of the results of the double materiality assessment process and approved the selection of Ernst & Young Audyt Polska Sp. z o.o. Sp.k. as auditor in the attestation process of the Group Sustainability Report for 2024. In addition, the subjects of the Audit Committee's meetings included the analysis and report on the implementation of the complaint handling process, the NPS results and action plan, the report on compliance with

ethical principles and the results of the review of violations of internal regulations or applicable laws by employees or organisational units, and information on the Bank's compliance with 'The Best Practice for GPW Listed Companies 2021'.

Risk Committee supports the Supervisory Board in overseeing the area of risk management. The Committee raises its opinion on the Bank's overall current and future risk appetite, the risk management strategy for the Bank's activities developed by the Management Board and the information submitted by the Management Board on the implementation of this strategy.

In 2024, as part of its discussion over credit risk issues, the Risk Committee addressed the level of physical risk, transition risk, risk appetite and the results of ESG questionnaires that are fulfilled when providing financing to Customers. In addition, the Risk Committee discussed ESG risk issues including information on regulatory risks and greenwashing risks.

Remuneration Committee and **Nominations Committee** support the Supervisory Board in its supervisory duties in the area of human resources management, as referred to in the Own workforce (ESRS S1)). The competences of the Remuneration Committee includes, among other things: analysing the performance of the members of the Management Board and making suggestions to the Supervisory Board in this respect, as well as recommending key performance indicators to the Board for the members of the Management Board. At least once a year, the Nominations Committee performs an individual and collective assessment of the suitability of the members of the Supervisory Board, which includes an evaluation of their knowledge, skills and professional experience.

In 2024, the Remuneration Committee discussed the pay gap and a summary of the implementation of the compensation policy.

A description of the composition and tasks of the various committees of the Supervisory Board can be found in Chapter: Corporate Governance, under section: [Committees of the Supervisory Board](#).

In 2016, the Group adopted a Code of Conduct that sets out standards of conduct in line with the values and mission defined by the BNP Paribas Group. The Bank's Management Board is accountable to the Supervisory Board for compliance with the provisions of this Code by all employees. Once a year, the Bank's Supervisory Board reviews the results of the assessment of compliance with the ethical principles at the Bank. The Code is made available on the Bank's [Website](#).

Depending on the escalation path, whistleblowing reports are forwarded to dedicated email inboxes to which the President of the Management Board or the Chairwoman of the Supervisory Board has access. An important element of the implementation of the whistleblowing policy is the Whistleblowing process regulated in the Whistleblowing Policy at BNP Paribas Bank Polska S.A. (Whistleblowing), which is designed to protect the interests of the Bank, employees, Customers, third parties and to monitor compliance with the law. At the Bank, Whistleblowing Clerks are responsible for receiving reports (for more details, see the section: [Business conduct policies and corporate culture \(G1-1\)](#)).

Expertise and skills of members of the Supervisory Board and Management Board

All members of the Supervisory Board and the Management Board have a variety of skills and experiences in the field of sustainability that they have acquired during their careers. More detailed information on the expertise of each member of



the Bank's Management and Supervisory Boards is presented in the chapter Corporate governance, [Statutory bodies of the Bank](#) section.

The top management makes every effort to broaden its range of competences in the area of sustainability, climate change and climate policy at advanced international training courses (e.g. Cambridge Institute for Sustainability Leadership) and meetings with recognised experts and researchers. It also regularly participates in sustainability conferences.

The Management Board and Supervisory Board are composed of individuals with the necessary skills to monitor the Bank's and the Group's material impacts, risks and opportunities.

Expertise and skills of the members of the Bank's Management Board

At the date of publication of the report, five members of the Management Board have documented trainings in sustainability, namely:

Przemysław Gdański – Chief Executive Officer

He has more than 30 years of international banking experience. He graduated from the IE Business School in Madrid with an Executive Programme in Sustainability.

For many years, he has been a consistent patron of initiatives to promote diversity, gender equality and support the activities of entrepreneurial women. In 2018, he received the special award Male Champion of Change, from the Foundation for Success Written in Lipstick. At the Bank, among other things, he oversees the Sustainable Development Area.

Małgorzata Dąbrowska – vice-president of the Board

She has more than 25 years of experience in the banking sector in the areas of operations, finance, business support, technology and transformation.

Participation in sustainability-related training in 2024:

- Participation in BNP Paribas Group's Sustainability Academy educational programme;
- COO Summit 2024 (part of the sustainability area focusing on environmental issues);
- BNP Paribas' Sustainable Finance Solutions, Future of ESG;
- Sustainable Finance Landscape & Effective ESG Strategies and Instruments – A Cambridge Senior Executive Programme.

Piotr Konieczny – vice-president of the Board

During his career he has attended numerous courses in management, leadership and sustainability.

He has more than 30 years of business experience in risk and finance functions. Since 1 September 2023, he has been Vice President of the Bank's Management Board overseeing the Finance Area, coordinating the preparation of the 2024 Sustainability Statement.

Participation in sustainability-related training in 2024:

- BNP Paribas' Sustainable Finance Solutions, Future of ESG;
- Sustainable Finance Landscape & Effective ESG Strategies and Instruments – A Cambridge Senior Executive Programme.

Magdalena Nowicka – vice-president of the Board

Since January 2021, she has been Vice-President of the Bank's Management Board, overseeing the New Technologies and Cybersecurity Area. The area of Cybersecurity was identified in the DMA process as one of the important Group-specific themes.

She is actively involved in projects supporting the sustainable development of women in the world of new technologies. She is a mentor of the 'Technology in a Skirt' programme. She is implementing the Green Tech programme to play a role in a holistic approach to sustainable IT.

Participation in sustainability-related training in 2024:

- The golden rules of cybersecurity (Złote zasady cyberbezpieczeństwa).

Agnieszka Wolska – vice-president of the Board

She has more than 20 years of experience in international listed banks in the Corporate and SME area. Since September 2021, she has been overseeing the SME and Corporate Banking area in BNP Paribas Bank Polska.

Participation in sustainability-related training in 2024:

- Participation in the Sustainability Academy educational programme of the BNP Paribas Group; BNP Paribas' Sustainable Finance Solutions, Future of ESG;
- Economic Paradigm Shift and ESG Impact;
- Sustainable Finance Landscape & Effective ESG Strategies and Instruments – A Cambridge Senior Executive Programme.

Expertise and skills of the members of the Supervisory Board

As of the date of publication of the report, nine members of the Supervisory Board have documented experience and/or training in sustainability.



Lucyna Stańczak-Wuczyńska – Chairwoman of the Supervisory Board

She has been involved, among others, in financing projects related to renewable energy, energy efficiency, low-carbon, sustainable finance, investing in green bonds, SLB and ESG topics in the area of corporate governance and reporting.

Lucyna Stańczak-Wuczyńska is the Chair of the Programme Board of Chapter Zero Poland (part of the Climate Governance Initiative). It is a programme to develop the competencies of supervisory and management bodies of companies. It was created by the World Economic Forum. The aim of the Polish version is to raise awareness of the consequences of climate change for companies and the impact of business on the climate. Since 2023, it has also chaired the Steering Committee of the Climate Governance Initiative, Global Financial Sector HUB. 2023. Lucyna Stańczak-Wuczynska also joined the programme board of POLSIF – Sustainable Investment Forum Poland.

François Benaroya – Vice-Chairman of the Supervisory board

He has more than 30 years of international business experience, including 20 years in banking, and is CEO of Europe Mediterranean in BNP Paribas, in charge of the universal banks of the Group outside the eurozone. He has participated in numerous training sessions organized by BNP Paribas on sustainability, including two sessions “Integrating Income and Impact” at INSEAD Business School.

Jean-Charles Aranda – Supervisory Board Member

From 2017 to 2023, he was Vice President of the Bank's Management Board in charge of the Finance Area, which from 2019 onwards co-wrote the annual integrated report containing financial, business and ESG information. Jean-Charles Aranda also served as a member and then Vice-Chairperson of the Supervisory Board of BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A. (TFI). He was a member of the Audit Committee, among others, involved in working with the auditors to assess the financial statements of the funds and the sustainability reporting of the TFI. He was also involved in setting targets for TFI Board members (including ESG targets).

Małgorzata Chruściak – Supervisory Board Member

She is a lawyer with more than 25 years of practice in business support and is also a coach and business mentor accredited with the European Mentoring and Coaching Council.

She has participated in the following sustainability events in 2024:

- EY Corporate Reporting Forum 2024 - for supervisory board members on ESG topics;
- #ESGONBOARDS sessions for Boards of Directors and Supervisory Boards on selected aspects related to sustainability and reporting, organised in conjunction with the Warsaw Stock Exchange;
- Conference Supervisory Board 2024.

Sophie Heller – Supervisory Board Member

She is an expert in marketing and communication with more than 30 years of practice. Ms. Heller has extensive experience in financial services (governance, digitalisation, innovation) and entrepreneurship.

She has participated in the following sustainability events:

- LfC Cambridge High Intensity Session on Positive Impact Business
- We Engage : Corporate Social Responsibility
- LfC Shape the Future – Mastering Sustainable Finance – A Cambridge Senior Executive Program

Monika Kaczorek – Supervisory Board Member

She is a member of the Council of the Reporting Standards Foundation of the Polish Association of Listed Companies, a member of the Chapter of the Best Annual Report Competition and a member of Chapter Zero Poland. She is also involved in conducting projects and trainings related to ESG and ESEF and optimising the presentation of financial statements of listed companies to ensure compliance with IFRS and usability for stakeholders. She provides trainings for auditors and reporters on ESG topics.

Piotr Mietkowski – Supervisory Board Member

Economist with over 30 years of experience in banking. He is currently Managing Director of Investment Banking for Central and Eastern Europe, Greece, Turkey and Israel at BNP Paribas Group and a member of the Supervisory Board at Ukrsibbank in Ukraine. He has participated in training courses related to sustainability, such as:

- How to engage Clients on ESG issues;
- Excellence in sustainable finance transactions ad ESG risks.

Khatleen Pauwels – Supervisory Board Member

Ms Khatleen Pauwels has nearly 20 years of experience in banking. Since January 202, she has been Managing Director of the E2E Operations Area (known as the Customer Service Centre) and also a member of the Executive Committee of BNP Paribas Fortis. In 2024, she obtained the Certificate in the programme ‘Shaping te Future: sustainable finance’ at the Cambridge Judge Business School Executive Education.

Integration of sustainability-related performance in incentive schemes (GOV-3)

The remuneration principles for members of the Bank's Supervisory Board and persons with significant influence on the Bank's risk profile, including members of the Bank's Management Board, are described in the Governance chapter, in section Remuneration of the Management Board and Supervisory Board Those rules are governed by the Remuneration Policy for Supervisory Board Members BNP Paribas Bank Polska S.A and Remuneration Policy for persons with significant influence on the risk profile of the Bank.



The Supervisory Board receives only a fixed remuneration from BNP Paribas Bank Polska S.A. (members of the Supervisory Board who are at the same time employed in any entity of the BNP Paribas Group do not receive any remuneration for their function as a member of the Bank's Supervisory Board) and, therefore, the members of the Board do not receive a variable remuneration linked to the sustainability objectives.

The members of the Bank's Management Board may acquire an entitlement to variable remuneration, the amount of which is determined on the basis of the Bank's performance, the performance of the business area and individual performance and is subject to change in line with changes in this performance. Targets are set individually for each member of the Bank's Management Board. The objectives are reviewed by the Remuneration Committee and are approved by the Bank's Supervisory Board. The objectives are then cascaded within the Bank's structures.

Sustainability is one of the four key pillars of the strategy GO beyond for the years 2022-2025 ([Pillar POSITIVE](#)), sustainability objectives are therefore included in the objectives of the Board members, however, it is not possible to determine a direct percentage relationship between the variable remuneration of the members of the Management Board and the achievement of sustainability targets.

In 2024, the objectives for the members of the Bank's Management Board included the following sustainability goals:

- As part of the Bank's strategic financial targets: new production (new volume) sustainable financing in 2024. - the target represented between 2.5% and 7.5% of annual targets depending on the member of the Management Board. The target did not apply to the member of the Management Board responsible for risk (Chief Risk Officer).
- With strategic and non-financial targets representing between 40% (Board members) and 50% (CEO) of annual targets:
 - target regarding the Code of Conduct, implementation of compliance training and implementation of audit recommendations,
 - target for employee engagement and eNPS indicator (for all Management Board members),
 - target for Customer satisfaction and NPS (of the Bank or the area - depending on the member of the Management Board),
 - Sustainable finance leadership targets: share of sustainable finance in the Group's loan portfolio (for all Executive Directors), share of sustainable assets under management (for one Executive Director), reduction of CO₂ emissions from own operations (for one Executive Director).

The remuneration policy for the Bank's employees including incentive programmes is approved by the Bank's Supervisory Board.

Remuneration rules for employees of subsidiaries are approved by the subsidiary's Supervisory or Management Board.

All the strategic objectives of the POSITIVE pillar have been included in the Bank's 2024 Sustainable Development Area Executive Director's objectives. In addition, the 2024 sustainability targets have been assigned to senior managers, members of the Sustainability Council, all employees in the Sustainability Area units and those responsible for developing and selling sustainable products and services. We are committed to ensuring that all employees adhere to the principles of sustainability as the basis of the organisational culture and meet measurable sustainability targets.

The variable remuneration policy for persons performing portfolio management or investment advisory activities in the Group, within the meaning of the Financial Services Sustainability Disclosure Regulation (SFDR), takes into account the principle of not encouraging excessive risk-taking with regard to sustainability risks and is linked to risk-adjusted performance.

Statement on due diligence (GOV-4)

The Group operates in a responsible manner, respecting human rights, labour standards or anti-corruption regulations. A description of the due diligence that the Group performs in the context of sustainable development can be found in various sections of this report. It covers both its own operations and its approach to the entire value chain.

In the table below, we set out the key elements of due diligence for each section of the Sustainability Statement

Core elements of due diligence	Section in the Sustainability Statement
Embedding due diligence in governance, strategy and business model	The role of the administrative, management and supervisory bodies (GOV-1, GOV-2), Strategy, business model and value chain (SBM-1), Policies related to own workforce (S1-1), Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)
Engaging with affected stakeholders in all key steps of the due diligence	Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3), Processes for engaging with own workforce and workers representatives about impacts (S1-2)
Identifying and assessing adverse impacts	Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1), Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)
Taking actions to address those adverse impacts	Transition plan for climate change mitigation (E1-1), Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3), Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3), Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4), Prevention and detection of corruption and bribery (G1-3)
Tracking the effectiveness of these efforts and communicating	The role of the administrative, management and supervisory bodies (GOV-1, GOV-2), Strategy, business model and value chain (SBM-1)



The activities of the Group's Customers may have a negative impact on certain sustainability issues and give rise to significant risks. Therefore, in response to the requirements of the EBA/GL/2020/06 Guideline of 29 May 2020 on lending and credit monitoring, we developed ESG assessment questionnaires for our Customers in 2021. These have been implemented in the lending process of all Customers in the corporate, SME and micro-enterprise segments. The purpose of the assessment is to identify any risks related to ESG factors affecting the financial situation of the Customers, as well as the impact of the Customers' economic activities on ESG factors.

For large Customers in the corporate segment, we also use a comprehensive assessment of the level of sophistication of sustainability practices (ESG Assessment). The analysis is carried out on the basis of extensive questionnaires that correspond to EU sustainability regulations and focus on ESG factors relevant to the industry. Thanks to the comprehensiveness of the issues analysed:

- we assess the scale of Customers' engagement in their key areas of social and environmental impact
- we determine whether Customers are aware of sustainability challenges and what commitments and actions they are taking,
- monitor progress in the implementation of ESG practices.

Risk management and internal controls over sustainability reporting (GOV-5)

Information on the main features of the Group's internal controls is detailed in the chapter: Corporate Governance, Internal control system (including control and risk management system for the preparation of financial reports).

The internal control system, specific to sustainability reporting, is mainly based on:

- mapping of existing data generation and collection processes;
- defining the roles, responsibilities and tasks of organisational units within sustainability reporting;
- a gap analysis between the pre-existing reporting system and regulatory requirements;
- a control system based on the general controls in place at the Bank and applicable to the units involved in preparing information for the Sustainability Statement.

The Audit Committee, as part of its monitoring of the reporting process, became aware of the status of the Bank's compliance with the new regulatory requirements under the CSRD. In this context, the 2024 Audit Committee received information related to the Sustainability Statement, including double materiality analysis, the auditor's attestation process, key indicators and issues that may generate potential risks.

Strategy

Strategy, business model and value chain (SBM-1)

The Group's diversified business model

BNP Paribas Bank Polska S.A. Capital Group is based on a diversified business model in order to respond to the needs of Customers in a coordinated manner and create value for them. The Group's parent company - BNP Paribas Bank Polska S.A. - is a universal Bank with a full product offering for Polish and international corporations, the SME segment, farmers and

retail Customers, with a local presence but with a global reach. The Bank holds a leading position in the agri-food and consumer segments, as well as in the sector of large companies and multinational corporations.

Foundations of the business:

- **Completeness of the offer** – We offer Customers a variety of financial products and services provided by the Bank and Group companies. We are close to our Customers. We provide services in a network of banking Customer Centres and we are constantly developing and adapting our outlets to their needs. Our loan products are also available at partner shops and selected car dealer networks. To meet the technological challenges, we are constantly developing our products and digital service channels: mobile and online banking, and new forms of communication.
- **Availability of the offer** – We aim to provide every Customer with equal access to banking. To this end, we are improving our products and introducing facilities at Customer Centres. Through these facilities, we provide access to banking for people with disabilities, seniors and those from groups at risk of exclusion.
- **Responsible risk management** – Our aim is to provide the highest quality service to Customers. Prudent market management and a culture of compliance are the pillars of the Group's business operations. We have implemented and apply procedures through which we manage risk. One of the key elements of this system is the management of ESG risks, including climate risk.
- **Supporting Customers in sustainable transformation** – The long-term promotion of sustainable economic development and the building of lasting relationships with Customers and other Group stakeholders is a key dimension of our responsibility. We offer products and services tailored to the changing needs of Customers, such as: Sustainability-Linked Loans, ESG Rating-Linked Loans and products with a positive environmental impact for green investments and projects. We strive to respond to global challenges and the conditions of the Polish market.

The Group conducts its business based on the following operating segments:

- **Retail and Business Banking** - serves retail Customers - including private banking Customers (Wealth Management) and business Customers – as well as micro-enterprises,
- **Corporate Banking**– offers a wide range of financial services to large and medium-sized enterprises, local government units and entities that belong to international capital groups,
- **Small and Medium Enterprise Banking**– serves Agro and non-Agro Customers,
- **Corporate and Institutional Banking (CIB)** – supports the sale of the Group's products to Polish companies and serves strategic Customers,
- **Other banking activities** include the Asset and Liability Management Division and the Corporate Centre.



Business model

Our strenghts

- A strong, committed to growth in Poland BNP Paribas Grup with an established international presence
- Engaged employees
- 7 512 persons with an eNPS: 27
- Appropriate scale of business operations with a diversified Customer base
- Consistently improving service quality. Highly rated Wealth Management services
- Wide range of products and services for institutional Clients
- Responsible risk management (including ESG risks)
- Sustainability in the Bank's DNA - 11.6% share of sustainable financing
- Healthy and balanced balance sheet structure and revenue sources generating a return on capital ROE 16.9% in 2024

Our diversified business model



GOeyond 2022-2025 business strategy

The main objective of the strategy GOeyond for 2022-2025, adopted by the Bank's Management and Supervisory Boards in March 2022, is to continue the dynamic development of the Bank, which will be an institution that operates efficiently, with committed employees and satisfied Customers, while being a leader in the area of sustainable development. Strategy GOeyond, after a multi-stage building of scale through acquisitions in previous years, focuses on organic growth while maintaining a responsible approach to risk management. This is the Bank's first business strategy fully integrated with an ESG strategy.

Changes in strategy and/or business model

Since 2022, the strategy has been implemented unchanged. In 2024, we started work on preparing the business strategy for the next period. Taking stakeholders' interests and viewpoints into account when defining the Group's strategy strengthens the relationship of trust. This approach will continue when defining the next strategic plans.

Sustainability targets

The quantitative objectives of the GOeyond sustainability strategy are included in the table 74. They allow the Group to monitor and evaluate the effectiveness of the products and services offered in relation to the sustainability objectives.

These targets were adopted on the basis of internal estimates and analyses. They have been mapped to individual ESRS standards for the purposes of this report. The main lever of the Group's action in the area of sustainable development is to support the ecological transformation of economic entities. To this end, we develop and offer products with a positive environmental impact, such as financing for renewable energy, energy efficiency and electromobility, as well as Green Loans. We also offer Customers products linked to ESG assessment and performance, among others, Sustainability Linked Loans. We support Customers across industries and sectors in their transformation towards zero carbon. We also take measures to reduce our direct environmental impact (reduction of our own CO₂ emissions). We initiate actions for sustainable development in Poland through partnerships. During the course of the strategy, from 2022 to the date of publication of this report, the sustainability-related strategic targets presented below have remained unchanged. For more information, see chapter: Strategy implementation, Pillar POSITIVE, that focuses on environmental responsibility. We are building social capital among our employees, through the ESG Academy and employee volunteering. These activities are described in more detail in the Own workforce (ESRS S1) section and Pillar TOGETHER presentation- the employee pillar of the strategy.

Information on actions taken in pursuit of the strategic objectives is further presented under the individual strategic pillars (chapter Implementation of strategy).

Table 74. Goals defined in GOeyond's sustainability strategy

Strategic Goal	ESRS	Strategy Pillar	Implementation 2024	Strategic goal 2025
Share of sustainable funding ¹ [vs. 2021]	E1	Positive	11.6%	45% » 10%
Share of sustainable assets under management [vs. 2021]	E1	Positive	27.3%	5% » 30%
Social commitment of employees ²	S1	Positive	2h 03"	4h
Branches certified as 'Barrier-free facilities' [vs. 2021]	S4	Positive	41%	18% » 50%
Reduction of CO ₂ emissions from operations [vs. 2019]	E1	Positive	59%	55%
Participation of women on the Bank's Management Board [vs. 2021]	ESRS2/G1	Together	37.5%	22% » 30%



Strategic Goal	ESRS	Strategy Pillar	Implementation 2024	Strategic goal 2025
Reducing the adjusted pay gap [vs. 2021]	S1 ³	Together	3.8%	7.3% » <4.0%
Net Promoter Score of employees eNPS [vs. 2021]	S1	Together	27	-9 » 20
NPS Retail Banking and Personal Finance	S4	Up	#6	TOP3 ⁴

1 - total balanced loans and advances/total loans and advances (portfolio valued at amortised cost)
 2 - average annual engagement in hours per employee
 3 - in ESRS S1, the Bank presented the wage gap unadjusted, in compliance with the ESRS definition
 4- NPS benchmark among individual bank Customers in Poland

Operational processes on sustainability issues require continuous improvement. Significant challenges are:

- Obtaining information on the ESG risks to which the Group's clients are exposed. In order to understand these risks, the Bank uses, among other things, the ESG Assessment process and the ESG Risk Assessment. The Bank is seeing a gradual improvement in awareness among Clients of the identified risks.
- Availability and reliability of ESG data - determining ESG targets or calculating ESG indicators is hampered by the limited availability of ESG data and the variability of calculation methodologies used by Customers. This necessitates the use of sectoral estimates and indicators, which raises the issue of data representativeness.

The Group creates and distributes financial products and services, as shown in the table below. This breakdown includes the Group's operating segments and ESRS business sectors as defined in the draft European ESRS SEC 1 standard published in September 2024 by EFRAG.

Table 75. Presentation of products and services of the group's operating segments according to the business nomenclature

ESRS Sectors\ Business lines	Credit institution	Capital markets (Asset Management, investment banking)	Other industries under Operating Leasing
Retail and business banking (including micro-enterprises)	Distribution of banking services (current banking, payments, deposits)	Distribution of investment fund units	Operating leasing, leasing loans*
	Distribution of savings, investment solutions (including life insurance) and pensions	Brokerage services (fund distribution, securities issuance, investment advice, stock transactions, asset custody and asset management)	
	Distribution of non-life insurance		

ESRS Sectors\ Business Lines	Credit institution	Capital markets (Asset Management, investment banking)	Other industries under Operating Leasing
	Distribution of financial solutions (loans, including home loans; leasing; factoring)		
Corporate and institutional banking (CIB)	Financial services (loans, bond issues, securitization)	Transactions in foreign exchange markets Currency and money market transactions (including derivatives)	Operating leasing, leasing loans
	Cash flow and liquidity management	Advice on mergers and acquisitions	
		Securities issue services	
Corporate Banking	Distribution of banking services (day-to-day banking, payments)	Brokerage, clearing and custody services	Operating leasing, leasing loans
	Distribution of financial solutions (loans, leasing, factoring, bond issues)	Distribution of investment fund units	
Small and Medium-sized Enterprises (SMEs)	Distribution of banking services (day-to-day banking, payments)	Distribution of investment fund units	Operating leasing, leasing loans
	Distribution of financial solutions (loans, leasing, factoring, bond issues)		

* excluding retail Customers

Value chain

The Group's products and services are distributed downstream in the value chain within the operating segments, representing the Group's business activities. The Group's **downstream** activities are mainly related to the Group's lending portfolio. The main participants in this part of the chain are all Customers served within the Group's operating segments.

The Group's **upstream** activities are related to all suppliers of services and products to the Group (e.g. energy suppliers, electronic equipment, office supplies, all kinds of services including consultancy). The main participants in this part of the chain are suppliers and business partners.



The business model of financial institutions, and consequently their value chain, is complex and its boundaries are very difficult to assess. Therefore, for the purposes of this report, the Group's value chain was analysed from two perspectives:

- **Group's business activities**, i.e. all the products and services of the Bank and Group companies for Customers.
- **Group's own operations**, i.e. the management of business activities, administration of buildings, equipment and services that the Group uses to conduct its operations. In addition, it is the consumption of resources such as energy, water, etc.

The materiality assessment of the sustainability topics was based on the downstream part of the supply chain, which, for a financial institution, is crucial for business operations. The analysis of the location and the carrying out of additional consultations on topics that have been deemed not material is not applicable to the Bank due to the nature of its business.

Value Chain Policies

In 2024, the Group's key regulations are updated, affecting relationships with entities in the Group's value chain:

- Code of Conduct,
- Anti-Corruption and Anti-Bribery Policy,
- Whistleblowing Policy,
- Policy on dealing with breaches of respect for others,
- Employee Remuneration Policy,
- Anti-Fraud Policy,
- Customer Acceptance Policy at BNP Paribas Bank Polska S.A. (KYC Policy),
- CSR Declaration for Suppliers.

Interests and views of stakeholders (SBM-2)

Objectives of stakeholder dialogue

Engagement with stakeholders we have an impact on and who affect our organization plays a key role in the due diligence process and in assessing the relevance of our sustainability efforts. We rely on constant and open dialogue with our stakeholders. This applies both to our day-to-day operations and to the processes involved in identifying and assessing impacts, opportunities and actual or potential risks. These interactions provide an opportunity to identify stakeholder expectations and incorporate them into the Group's operations. This dialogue is also crucial for informing and explaining our decisions and actions to stakeholders, in order to further increase the transparency and clarity of our communications.

Key stakeholders of the Group

- Clients (retail Customers, small businesses and associations, residential communities, corporate Clients and SMEs);
- Employees and associates;

- BNP Paribas Bank Polska S.A. Group companies;
- entities within the BNP Paribas Group in Poland and abroad;
- Market environment (business partners, suppliers, consumer and industry organizations, competitive environment, administration, national media);
- supervisory authorities (the Polish Financial Supervision Authority, National Bank of Poland, Bank Guarantee Fund);
- Capital market (institutional and individual investors, Warsaw Stock Exchange, rating agencies, analysts);
- Local communities (social partners, local government administration, institutions supporting cultural, educational and sports events, universities, schools, residents of local communities, local media, NGOs);
- Environment (regulatory organizations and environmental NGOs, scientific publications).

Ways of organising dialogue with stakeholders

BNP Paribas Bank Polska S.A. has a structured approach to stakeholder dialogue. The Group adapts and implements dialogue channels in accordance with stakeholder goals and expectations. The Bank represents an approach of analyzing the views and interests of its key stakeholders in relation to its strategy and business model. Management and the Supervisory Boards are informed of the results of the dialogue.

Main channels of dialogue by type of stakeholders

- For the Group's Customers, the exchange of information is based on specialized teams of experts providing dedicated support to Customers or sectors (large companies, financial institutions, SMEs and mid-caps, entrepreneurs, associations, micro-entrepreneurs, etc.).
- The social dialogue with employees and social partners is taken care of by the Human Resources Management Area and the Communications, Marketing and Social Engagement Division. As for job candidates, dedicated teams handle contacting them in terms of recruitment. In addition, for several years the Group has been conducting an employee opinion survey on so-called "important topics" described in the Group's annual report. The last such internal dialogue for the dual materiality analysis was held in October/November 2023.
- In 2023, we once again invited representatives of key stakeholder groups to an online dialogue session conducted in accordance with the AA1000 SES stakeholder engagement standard. The purpose of the stakeholder dialogue was to listen to the opinions, needs and expectations of key stakeholders regarding the implementation of the Bank's business strategy activities, including sustainability aspects. Participants in the meeting also had the opportunity to identify other topics that are important to them. The issues identified during the panel were included as stakeholder expectations in the context of double materiality assessment (DMA). The meeting was attended by 16 people, including representatives of companies (SME and Corporate Clients) and organizations such as: Consumer Federation, UNEP/GRID-Warsaw, European Bank for Reconstruction and Development, National Chamber of Commerce, Responsible Business Forum, Give Children Strength Foundation, as well as representatives of suppliers and sell-side analysts. The conclusions of the meeting were



presented to the Executive Director of the Sustainable Development Area and the Sustainability Council, and are being taken into account in the sustainability-related plans and initiatives broadly described in the Sustainability Statement.

- A dedicated organizational unit within the Bank - the Investor Relations Office - is responsible for relations with shareholders, investors and other capital market participants. The Bank reports on its sustainability activities in the Management Reports on the activities of the Bank's Capital Group and quarterly results presentations.
- The Central Procurement Department is responsible for relations with suppliers and subcontractors, and has conducted webinars for suppliers in 2024. A special briefing material was also prepared for suppliers containing ESG knowledge in 2024.
- The Office of Management and Organization is responsible for relations with regulatory bodies and public authorities. In addition, each area interacts with the relevant authorities directly. The Bank's Management and Supervisory Boards also participate in this dialogue.
- The think tanks, civil society and its organizations (local communities, civic NGOs, consumer associations, charities) are in regular contact with the BNP Paribas Foundation and the Sustainable Development Strategy and Analysis Department.
- The Corporate Communications Department is authorized to deal with the media and opinion leaders.

Objectives of stakeholder dialogue

Conducting an open and constructive dialogue with identified key stakeholders aims to achieve the following:

- **Anticipate business changes** and improve our products and services. Dialogue with stakeholders helps to better identify and understand their expectations, and thus allows us to continuously adapt the Group's practices, product and service offerings to the actual needs of Customers.
- **Optimize risk management** by listening to internal and external stakeholders and developing a positive dialogue with them, we are able to implement proactive risk management.
- **Innovative solutions** that have a positive impact on society. We listen to our stakeholders and fulfill our economic, social, civic and environmental responsibilities, aiming to have a positive impact on society as a whole.

Consideration of the effects of stakeholder collaboration

Dialogue with stakeholders is at the heart of the Group's social and environmental responsibility and is a key lever in achieving GO beyond's strategy goals.

- Procedures for dialogue with employees or employee representatives are described under: Own Workforce (ESRS S1) part under Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3). Employees and third parties can use the Bank's whistleblowing system (see also ESRS G1, Whistleblowing system)

- The Group's retail and corporate Customers have access to the complaints process. The Bank has a specialised complaints handling unit and a Customer Ombudsman. We write more about this in the part: Consumers and end-users (ESRS S4), in the section: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)
- The Bank engages in dialogue with individual Clients on an ongoing basis. The channels of communication and its frequency are described in section: Processes for engaging with consumers and end-users about impacts (S4-2)
- In terms of asset management by BNP Paribas TFI S.A., when ESG analysis of the companies in which it invests finds irregularities or certain areas in the company's operations are rated low, one of the instruments available to TFI is to engage in discussions of ESG issues with those entities.
- The Bank and its subsidiaries work with their suppliers. Regular business reviews of major suppliers are conducted. In 2024, we held a meeting as part of the so-called "Purchasing Academy" dedicated to key suppliers. The Group also offers them recourse in case of difficulties [see Business conduct (ESRS G1)].
- We regularly present to investors and analysts our strategy and the level of implementation of its goals, including with regard to sustainability.
- Understanding the interests and views of key stakeholders will be important for us in the context of designing a new strategy and planning potential changes to the Group's business model.

To feed our map of material impacts, risks and opportunities, we used surveys, dialogue panels and a risk monitoring system to listen to stakeholder expectations. CSRD's materiality assessment of Group's impacts, risks and opportunities allowed us to classify about 90 sub-topics into ten topical ESRSs, according to their materiality to the Group's internal and external stakeholders, considered to be minimal, medium, significant or critical. More in a section: [Description of the processes to identify and assess material impacts, risks and opportunities \(ESRS 2 IRO-1\)](#).

Stakeholder interests and opinions - own workforce

Employees are a special category of stakeholders for us, and it is with them that we maintain an ongoing dialogue. Among the tools the Group uses to listen to employees are targeted surveys, social dialogue, employee networks and an alert platform.

We build an attractive and engaging workplace through an open dialogue with employees called Employee Voice. It is based on a collection of tools and processes that give working people the opportunity to express their opinions and ideas in the workplace, and thus allow them to influence their work environment. The Employee Voice survey serves to increase employee engagement, improve internal communication, and provide a better understanding of employees' needs and expectations. The unit responsible for the Employee Voice Survey at the Bank is the Organizational Culture Team, which works closely with the Internal Communications Team and the Research and Customer Knowledge Team in this regard. The role of the Team is to listen, analyze and draw conclusions and prepare recommendations from the feedback of working people given, among other things, through surveys, and to take care of the selection and standard of surveys carried out in the organization.



Pulse Check - periodic engagement survey

The main tool for collecting opinions is the Pulse Check survey. The last survey was held in October 2024, and its results were analyzed by managers, HR Business Partners, the Organizational Culture Team and the Management Board.

Table 76. eNPS Pulse Check Indicator

eNPS	October 2024
Question: how likely are you to recommend BNP Paribas Bank S.A. as an employer to your friends and family?	27

Compared to the previous edition of the survey, there were no significant changes in the Bank's overall results. The highest rate of positive responses given by employees (97%) was for the statement about commitment to work: *I fully engage in my work to contribute to the success of the company*. Very well rated statements are those about supervisors: *My direct supervisor supports me when I need it* (91% of positive responses) and *My direct supervisor gives me enough autonomy so that I can do my job well*. The eNPS indicator for the Bank as a whole continues to show an upward trend. In this edition of the survey, the index increased by 3 points to reach a score of 27. In justifying their recommendation to work at the Bank, employees most often cited a good atmosphere, opportunities for training and development, and stability of employment.

We calculate the eNPS (employee net promoter score) index based on the answer to the question: *how likely are you to recommend BNP Paribas Bank Polska S.A. as an employer to your friends and family?* Everyone answers using an eleven-point scale from 0 to 10. When answering, it is important to keep in mind how the various choices are interpreted:

- choice of ratings from 0 to 6 - means "I am not satisfied with the pro-employee activities offered by the Bank" (critics group),
- choice of ratings 7 or 8 - means "I do not have an opinion on this topic and pro-employee activities in the Bank are neutral to me" (indifferent group),
- choice of ratings from 9 to 10 - means "I rate positively the activities implemented for employees in the Bank" (promoters group).

Based on these results, the eNPS index is calculated according to the formula: eNPS = % of promoters - % of detractors.

MiSie platform - feedback exchange

At the end of 2023, we launched the MiSie platform for some areas of the Bank, and in the first half of 2024 we made it available to the rest of the organization, which included mostly people working in the sales network. Currently, about 7,500 users have access to the feedback tool, 81% of whom have activated on the platform. During this period, we carried out a change in the organization to build a culture of ongoing feedback supported by the MiSie platform. We conducted promotional, educational and training activities aimed at existing users of the platform, and after full implementation in the second quarter of 2024, focused on both new and existing users of the tool. Among the activities implemented were an Appreciation Day, short educational animations to promote a culture of feedback, challenges with prizes, and numerous

training sessions. Leaders gained valuable insights during webinars on how to work with their teams based on dashboards shared after weekly "Friday 6" surveys, in which teams share their feedback on engagement and satisfaction. The Friday 6 dashboards allow managers and teams to monitor more than 20 indicators on an ongoing basis, including: climate, eNPS, managerial and inspirational leadership index, values, integrity and transparency, equal treatment and inclusion, collaboration, stress management, wellbeing, psychological safety or Customer focus.

Social dialogue

There are trade unions at the Bank, representing and defending the professional and social rights and interests of all employees, both at the level of collective and individual labor law. Trade union organizations bring together employees, persons in non-employee employment relationships (contractors, self-employed) and retirees of the Bank.

All employees of the Bank, excluding members of the Management Board, employees seconded to work abroad, persons working at the Bank on the basis of secondment from other entities of the BNP Paribas Group, persons employed at the Bank under managerial contracts are covered by the provisions of the Company Collective Bargaining Agreement, which is an agreement concluded between the employer and trade unions representing employees. Its content defines the conditions of employment and remuneration. The provisions of the Company Collective Bargaining Agreement, being the result of joint arrangements with the social partners, contain more favorable provisions than those adopted by the generally applicable labor laws.

Trade union organizations cooperate with the employer in the field of employment policy and wage formation.

The basic principle of cooperation with trade unions is partnership.

The cooperation between the Bank as an employer and the trade unions is carried out through dialogue, acting in good faith, respecting the competence and legitimate interests of the parties to the dialogue (Human Resources Management Policy at the BNP Paribas Bank Polska S.A.).

Employee networks

In order to strengthen an inclusive organisational culture, the Bank fosters the creation and supports the activities of grassroots employee networks that support groups at risk of discrimination and exclusion, in various thematic areas such as gender equality, disability, LGBT+, multiculturalism, age, parenting, etc. The activities of staff networks aim to promote respect, equal opportunities and strengthen a culture of openness and inclusion. The network's activities focus on building awareness, education, breaking down stereotypes and prejudices. Employee networks are a source of support, personal and professional development, strengthening commitment and a sense of belonging. For the Bank, they are a partner, a consultant, a co-creator of solutions that build an inclusive organisation, as well as the availability of products and services. In 2024, six employee networks were active: Dad, you've got it made, Agave Age, BNP Paribas Women of Change, BNP Paribas Pride Poland, Means I can, Neuronauts

Other Group companies did not independently organize employee networking initiatives.



Alerts reported by employees

Group employees have the right to report in good faith threats to the general public interest or crimes - violations of standards, laws, internal procedures, including the Group Code of Conduct. For more, see [Processes for engaging with own workforce and workers representatives about impacts \(S1-2\)](#).

Informing administrative, management and supervisory bodies

Individual management and governance bodies are informed of stakeholder views and expectations on sustainability matters through the Chief Sustainability Officer.

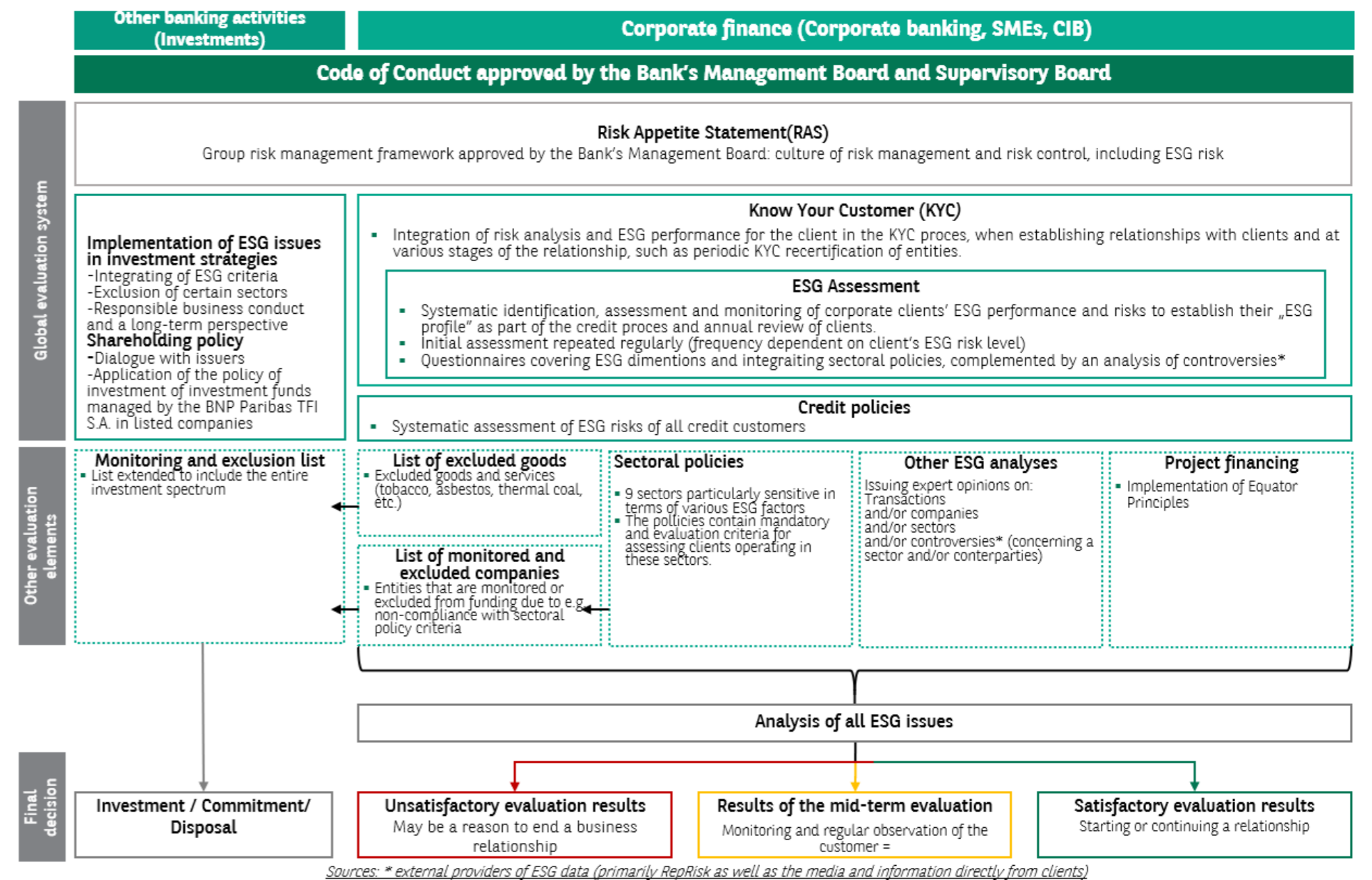
Managing impacts, risks and opportunities

The Group's Customer operations may generate negative ESG impacts and risks. In order to mitigate and monitor these potential negative impacts and risks, the Group employs a comprehensive system for identifying them in the Group's operations, covering environmental, social and corporate governance aspects. This system makes it possible to combine the knowledge and assessment of each Customer's ESG performance through the existing Know Your Customer (KYC) and ESG Assessment (ESG Assessment) processes, and to identify significant impacts, risks and opportunities, in particular through the risk assessment processes in the Risk ID tool described in this chapter under Financial materiality analysis methodology: risk dimension, stakeholder consultation and monitoring of strategic objectives and targets.

The system is integrated operationally, particularly through credit policies and sector policies that incorporate ESG criteria. In this way, the overall system ensures that ESG issues are considered in credit and investment committee meetings.

The complete system is shown in the diagram below:

ESG risk analysis system in Group operations



Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)

The Group used the system outlined above to conduct a Double Materiality Assesment (DMA) and identify material impacts, risks and opportunities (IROs) for the Group's business operations using a certain number of criteria and thresholds detailed below.

The DMA process was conducted in accordance with an internally developed methodology.



At the beginning of the process, we mapped the Group's value chain, based on past analyses conducted by the Bank for non-financial reporting purposes in accordance with the Global Reporting Initiative (GRI). In particular, we focused on analyzing the downstream part of the value chain, i.e. our loan portfolio, which is central to our business operations.

We reviewed the activities, business relationships and context resulting from the analysis of the market in which we operate.

We have mapped current GO beyond Strategy to the specific reporting issues identified in the ESRS. We also took into account the current regulatory environment, industry analysis of the banking sector, and media reports especially regarding our key Customers and business partners.

Structure of the double materiality assessment

We conducted a double materiality assessment by following four steps to cover ESRS topics defined in the regulations:

- **Understand and define:**

- the Group's value chain, in particular by taking records of the Group's key business processes, broken down into those carrying out the Group's core business activities and management and organizational processes, in order to gain a structured understanding of the Group's operations within its own operations and within its business relationships with upstream and downstream entities, and
- ESRS sub-topics relevant to the Group, which led to the addition of two entity-specific topics to the Group's activities: "Cybersecurity" and "Market Integrity and Financial Security".

- **Identify on the two sub-perimeters of the value chain:**

- actors within our value chain to define affected stakeholder groups (stakeholders),
- definition of impacts, risks and opportunities has ESG/ESRS sub-topics.

- **Assess the materiality of impacts, risks and opportunities** for each sub-topic on a scale of one to five (from "1-minimal" to "5-critical") for the identified sub-perimeters of the value chain;

- **Determine, on the two sub-perimeters of the value chain, the materiality threshold** for impacts, risks and opportunities; when the rating is 3-Important and above on at least one of the three dimensions, then the sub-topic is considered material.

The methodology for double materiality assessment is the same for all ESRS topics/ sub-topics, without distinction.

Analysis Methodology of Impact Materiality

The methodology for identifying and assessing current and potential impacts is based on information obtained from our key stakeholders, consolidated and classified according to ESRS sub-topics, for all Group activities. The assessment of material impacts was done in two steps:

- **comments from key stakeholders:** Customers, investors and non-governmental organizations (NGOs), as well as feedback from employees to determine the significance of the impacts/influences of each ESRS sub-topic. We used the findings from the dialogue panel and surveys conducted in October-November 2023;

- **the analysis conducted by internal experts** was based on an expert assessment of the scale, scope, likelihood and severity of the identified impacts and an assessment of reputational risk.

It should be noted that in assessing the Group's impacts, we were unable to determine their time horizons with sufficient certainty. We therefore decided to take a conservative approach and considered all identified impacts as current (short-term). The Group works with all stakeholders as described in section: [Interests and views of stakeholders \(SBM-2\)](#).

As a result of an in-depth discussion among the Group's experts moderated by an external company, the impact assessments of the following sustainability sub-topics were raised:

- code of conduct and anti-bribery;
- own workforce;
- relationships with end users (Customer satisfaction, transparent and relevant information, complaints management, human rights, financial inclusion = social inclusion)
- climate change mitigation.

Financial Materiality Analysis Methodology – the risk dimension

The materiality analysis methodology we use is based on the results of Group's annual risk inventory process, which aims to identify and assess all risks in the Group's operations. This is done as part of a formalized, comprehensive and forward-looking process, using the Risk ID tool. Representatives of the organizational units responsible for measuring a given risk participate in the identification of risks. To the best of their knowledge they identify risks within their areas of responsibility that can be assessed as material and that could jeopardize the achievement of the Group's mission and goals. As part of this process, an analysis of the internal and external environment is carried out. The purpose is to provide information, respectively, on the reasons for operational actions taken to implement the Group's strategy, and to obtain information on changes in the external environment and their impact on the activities of individual organizational units. In conducting the identification of the external environment, many issues are taken into account. Among others, we analyze: factors related to infrastructure, economic conditions, risks, political changes, the legal environment, the natural environment, suppliers and service providers, Customers and competitors. Risks are identified and assessed through the perspective of three elements:

- **risk events** related to a variety of risks including credit, market, operational, compliance, among others. The BNP Paribas Group has developed so-called correspondence tables between the different Risk ID parameters make it possible to direct risk events to one or more ESG topics, without double counting;
- **risk factors**, the purpose of which is to detail the causes underlying the materialization of risk events (including ESG risk factors);



- **assessing the likelihood and severity of risk events** by assessing their potential expected loss.

We used the identified ESG factors to analyze materiality for the purposes of the Sustainability Statement. For this purpose, we developed a matrix of risk types and risk factors to calculate and extract materiality corresponding to the reporting areas.

To assess the impact of physical and transition risks in the risk identification (Risk ID) process, the Group uses, among other things, the results of climate stress tests.

The annual expected loss threshold is set by the Group annually as part of its risk identification and ICAAP (Internal Capital Adequacy Assessment Process).

The key climate assumptions used in the Group's financial statements are consistent with those presented in section: Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) climate scenarios over a 20-year horizon.

Risk events are considered in time horizons ranging from short-term (less than one year), through medium-term (one to three years) and long-term (three to 30 years). The materiality analysis used in this report is based on the methodology and results of risk identification for 2024.

Opportunities assessment

GO beyond's strategy identifies development opportunities for the Group. To be consistent with operational tools and processes, the methodology for identifying opportunities in the double materiality process was based on defined strategic objectives in 2024, including targets set for sustainability issues.

The methodology for evaluating opportunities is based on:

- **Step 1:** Identify a strategic commitment monitored through a performance indicator (strategic KPIs) and linked to an ESG sub-topics;
- **Step 2:** analyze nominal expected additional business revenues and cost savings associated with the Group's own operations.

The quantification of opportunities corresponds to the horizon of the strategy, i.e. the relevance of opportunities is assessed in the medium term.

Opportunity identification and assessment methodology applies to all ESRS topics not specific to climate change.

Management and internal control

The internal control process is described in the Corporate Governance, Control System and Risk Management section of the reporting process and earlier in the General Disclosures section (ESRS2) under Risk management and internal controls over sustainability reporting (GOV-5).

The analysis of impacts, risks and opportunities is based on operational processes already in place with control procedures in place.

Summary of the double materiality assessment (DMA)

The Group's approach to assessing materiality includes all identified areas of impact on sustainability matters. We consider a given topic/sub-topic to be material when:

- the Group's negative impact on the topic are considered significant by key stakeholders;
- risks generated by the topic (i) directly to the Group or (ii) indirectly through its financial activities, are above a certain annualized expected loss threshold;
- opportunities related to the topic are defined as part of the Group's strategic plans and monitored by a performance indicator, for which financial quantification was possible.

This process and the results of the double materiality assessment will be reviewed annually and may therefore evolve in the next exercises conducted by the Group. ESG topics and their respective impacts, risks and opportunities assessed as material are presented in the following section (see tables 77 and 78).



Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Table 77. Double materiality matrix by sustainability topics/sub-topics

No.	Code	Topic/sub-topic	Impacts	Risks	Opportunities	Materiality for the Group
1	E1-A	Climate Change Adaptation	1-Minimal	3-Medium	1-Minimal	material
2	E1-B	Climate Change Mitigation	3-Medium	3-Medium	5-Critical	material
3	E2	Pollution	1-Minimal	1-Minimal	2-Informative	non-material
4	E3	Water and marine resources	1-Minimal	1-Minimal	2-Informative	non-material
5	E4	Biodiversity and ecosystems	1-Minimal	1-Minimal	2-Informative	non-material
6	E5	Resource use and the circular economy	1-Minimal	1-Minimal	2-Informative	non-material
7	S1	Own workforce	4-Significant	3-Medium	2-Informative ²	material
8	S2	Workers in the value chain	1-Minimal	1-Minimal	1-Minimal	non-material
9	S3	Affected communities	1-Minimal	1-Minimal	1-Minimal	non-material
10	S4-A	Relationship with end-users (Customer satisfaction, transparent and relevant information, complaints management, human rights, financial inclusion = social inclusion)	3-Medium	5-Critical	2-Informative ²	material
11	S4-B	Personal security, including data privacy	4-Significant	1-Minimal	1-Minimal	material
12	G1-A	Protection of whistleblowers and anti-bribery	3-Medium	1-Minimal	1-Minimal	material
13	G1-B	Code of conduct	4-Significant	1-Minimal	1-Minimal	material
14	G1-C	political engagement and lobbying activities	1-Minimal	1-Minimal	1-Minimal	non-material
15	G1-D	Supplier relations	2-Informative	1-Minimal	1-Minimal	non-material
16	Gx	Cybersecurity	n/a ¹	3-Medium	1-Minimal	material
17	Gy	Market integrity and financial security	n/a ¹	3-Medium	1-Minimal	material

¹ Stakeholder engagement (surveys/stakeholder panels) was conducted prior to the Group's decision on additional entity-specific topics - this does not affect the conclusions, as the topics are relevant from a risk perspective.

² Quantification of opportunities was not feasible.



Table 78. Detailed list of impacts, potential risks and material opportunities (IROs) for the Group by ESRS sub- topic

Topic	Sub-topic	Value chain	Category	IRO	IRO description
Climate change (ESRS E1)	Climate change adaptation	Business activities	Risks	Credit risk arising from physical risk	Credit risk arising from the physical risks associated with the intensification of extreme weather events (droughts, heat waves, floods, etc.) and the resulting transition risks.
			Impacts	Customers greenhouse gas emissions	The Group has an indirect impact on the climate by financing Clients that emit greenhouse gases.
	Climate change mitigation and energy consumption	Business activities	Risks	Credit risk arising from transition risks	Credit risk arising from stranded assets or decline in activity in certain sectors exposed to transition risk
			Risks	Reputational risk	Reputational risks associated with accusations of greenwashing and funding of sectors with high greenhouse gas emissions.
			Opportunities	Financing the low-carbon transition	Opportunity related to offering sustainable products and services that promote Clients' transition to a low-carbon economy
Own activity	Opportunities	Reduction of direct greenhouse gas emissions	Reducing the carbon footprint of the Group's own operations can lead to lowering the costs, improving the Group's image and increasing employee awareness.		
Own workforce (ESRS S1)	Employment in the Group	Own activity	Impacts	Discrimination, inequality and exclusion	Sporadic incidents of discrimination, inequality and exclusion among employees .
				Violence and mobbing in the workplace	Sporadic incidents of violence and harassment at work among employees.
			Risks	Psychosocial risks	Operational risks related to business continuity: psychosocial risks (burnout and job abandonment) for employees related to recent changes in working methods and environment.
				HR legal risks	Legal risks: disputes related to discrimination (including mobbing), employment contracts (breach of contract, resignation) and employer's obligations towards employees (e.g. unequal treatment).
Consumers and end-users (ESRS S4)	Protection of Customers' interests, clear, transparent and not misleading information	Business activities	Impacts	Financial difficulties due to lack of information	Impact on retail Customers at risk of financial difficulties, particularly where information about financial products or services is not clear, transparent and misleading.
			Risks	Legal and reputational risks relating to lack of information	Risks related to the protection of retail Customers' interests, such as the risk of sanctions, fines from regulators and legal proceedings initiated by Customers; reputational risks related to the actions of third parties (Customers, NGOs, etc.).
	Social inclusion	Business activities	Impacts	Social inclusion	Non-discrimination in access to products and services by introducing facilities for, among others, the elderly and people with disabilities.
	Customer satisfaction	Business activities	Impacts	Customer dissatisfaction	Dissatisfaction of retail Customers due to lack of or limited access to a product or service affecting their personal projects and plans.
Risks			Legal risks associated with Swiss franc (CHF) mortgage loans	Legal risks related to pending litigation involving CHF denominated or foreign currency mortgage loans, taking into account the current status of judgments in cases against the Bank and the line of case law.	



Topic	Sub-topic	Value chain	Category	IRO	IRO description
Business conduct (ESRS G1)	Data protection	Business activities	Impacts	Impact related to legal and reputational risks resulting from loss or theft of confidential data Avoiding data leakage	Legal and reputational risks arising from breaches of data protection legislation (e.g. breach of the RODO regulation) and/or loss or theft of confidential Customer information.
	Business conduct (including whistleblower protection)	Business activities	Risks	Impact related to legal and reputational risks associated with corruption or influence peddling Avoiding undesirable events	Reputational, legal or financial risk for the Group if it is involved in acts of corruption or influence peddling, directly or indirectly, actively or passively.
	Corporate culture	Own operations	Impacts	Impact related to employees' adherence to values and ethical principles	Declared values of the organisation, mission statement, Code of Conduct.
Group specific topics	Market integrity and financial security	Business activities	Risks	Legal risk of not identifying suspicious Customer activity	Legal risk if the Group fails to identify, lack of monitoring and reporting suspicious Customer activity. The Group may be held criminally and administratively liable, as well as exposed to incurring significant remedial costs, if it fails to detect and report criminal activities such as money laundering.
	Cybersecurity	Own activity	Risks	Operational risks generated by cyber attacks	Operational threats to continuity and resilience: system disruption due to cyber attacks.
				Legal risks arising from cyber attacks	Legal risks caused by loss or theft of confidential data as a result of cyber attacks
				Reputational risks generated by cyber attacks	Reputational risk related to the Group's ability to counter cyber-attacks.

Reducing negative impacts in terms of ESG factors is possible through, among other things, the following described earlier: assessment of ESG risks in the process of selecting counterparties, sector policies, a list of monitored and excluded companies, and KYC tools, and in the case of investment activities, dialogue with issuers of instruments in which the TFI invests.

In the process of identifying risks, the significant impact of ESG factors on credit risk was recognized. Since ESG factors are not yet comprehensively included in the quantitative measurement framework for credit risk, a decision was made to separate ESG risk as a hard-to-measure risk category until ESG factors are included in credit parameters. As a result of the above, the Bank has incorporated ESG risk into its internal risk management framework by including ESG risk as a subtype of credit risk in its Risk Management Strategy and Risk Appetite. In order to mitigate and control the risk, the principles for measuring ESG risk in the Bank's internal capital assessment process (ICAAP) were also developed. The capital plan for 2022-2025 was supplemented with limits for ESG risk determined based on the risk measurement made. ESG Risk Management Principles were also developed, which include, among other things, provisions for risk monitoring and reporting, and stress testing.

ESG risk emphasizes traditional credit risk, which may increase pressure on the Group's financial performance. The Group's ESG risk management and stress testing system is integrated into the overall risk management system, which is detailed in the Risks and Opportunities chapter, under Risk management system.

In order to mitigate negative impacts and potential risks and to develop its opportunities, the Bank has implemented policies, broken down into specific actions, outlined in individual topical standards (ESRS): Climate Change (ESRS E1), Own Workforce (ESRS S1) Consumers and End-Users (ESRS S4), Business Conduct (ESRS G1).

Rating ESG

In 2024, the Morningstar Sustainability rating agency updated BNP Paribas Bank's ESG risk rating based on changes to its methodology. Thus, the Bank recorded a score of 9.8 (the lower the rating, the higher the resilience to various risks), an even better score than last year (10.2). A score at this level represents what the agency describes as 'Negligible Risk'.

Disclosures in relation to specific circumstances (BP-2)

The existence of specific circumstances can change the content of sustainability information. This could be a deviation from the time horizons originally specified in the regulation, but also the use of value chain estimates or sources of uncertainty related to these estimates. The following table provides information on those parts of the report that help understand these specific circumstances.



Table 79..Parts of the Sustainability Statement affected by specific circumstances: time horizons, estimates and sources of uncertainty

	Paragraph	Disclosure requirement BP-2	Related information	Sustainability Statement sections
Time horizons	9 a	Definitions of medium- or long-term time horizons	Climate stress tests	ESRS E1, Material influences, risks and opportunities, (ESRS 2, SBM-3)
	9 b	Disclosures of the reasons why the application of these definitions of the time horizon is different	Financial materiality analysis: the risk dimension	ESRS 2 Material influences, risks and opportunities (ESRS 2, SBM-3)
Value chain estimates	10 a	Disclosure of the indicators used, which include upstream and downstream value chain data that are estimated using indirect sources such as sector averages or other proxies	Scope 3 category 15 (financed greenhouse gas emissions) Scope 3 category 6 (business travel)	ESRS E1-6 Gross greenhouse gas emissions
	10 b	Description of the basis for the preparation of value chain metrics estimated using indirect sources		
	10 c	Description of the level of accuracy resulting from indicators including value chain data estimated using indirect sources		
	10 d	If applicable, a description of planned actions to improve the accuracy of indicators, which include value chain data estimated using indirect sources		
Sources of uncertainty in estimates and results	11 a	Publication of quantitative indicators and monetary amounts that are subject to a high level of measurement uncertainty	Description of the resilience of the strategy and business model	ESRS E1, Material influences, risks and opportunities, (ESRS 2, SBM-3) ESRS E1-6 Gross greenhouse gas emissions

	Paragraph	Disclosure requirement BP-2	Related information	Sustainability Statement sections
	11 b (i)	Disclosure of information on sources of measurement uncertainty	Scope 3 category 15 (financed greenhouse gas emissions)	
	11 b (ii)	Publication of assumptions, approximations and evaluations used for measurement	Scope 3 category 6 (business travel)	

Information on value chain estimates and sources of uncertainty in estimates and results are disclosed with each ESRS topic area. Where data were not available, an estimation method was used, in each case described with the specific disclosure.

The GHG emissions data presented in the ESRS relates to the Group and the upstream and downstream value chain. The process for calculating the organisation's carbon footprint is described in ESRS section E1-6. The method for estimating scope 3 category 15 emissions (investments) and calculating scope 3 category 6 emissions (business travel) is described in Table 89. Reported scope 3 category 15 emissions exclude, among others, emissions from government bonds and scope 3 customers.

The taxonomic disclosure process used data from third-party providers.

Given the broad loan portfolio and the difficulty of obtaining data from the Group's Customers and other business partners, quantitative data may involve a risk of measurement uncertainty. Documentation of data sources and estimation methodologies, as well as any disclaimers regarding the uncertainty of the results presented, are presented with due diligence. We have attempted to describe as accurately as possible the facts of the Group's sustainability activities to date.

For the purpose of the risk analysis presented in this Sustainability Statement, including climate risks, the following time horizons were used:

- short-term - less than a year,
- medium-term - from one to three years,
- long-term - from three to 30 years.

According to the time horizons used in the risk identification process. The Group identifies opportunities only in the medium term.

The topics covered by ESRS E1, S1, S4, G1 have been identified as material as a result of materiality assessment and are hereby reported. In addition, the Group has identified two specific topics: financial integrity and security and cybersecurity.



This report is the first Sustainability Statement of the BNP Paribas Bank Polska Group fully prepared on the basis of ESRS standards. Therefore, no changes in the preparation or presentation of the Sustainability Statement or errors for previous periods are reported.

The Sustainability Statement includes:

- the disclosures required by Article 8 of the Taxonomy Regulation (2020/852), which are part of ESRS E1
- calculations of greenhouse gas emissions in scope 3 category 15 presented on the basis of the PCAF (Partnership Carbon Accounting Financials) Part A guidelines (information included in the section [Gross Scopes 1, 2, 3 and Total GHG emissions \(E1-6\)](#)).

Disclosure Requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

Table 80. Disclosure Requirements in ESRS covered by the undertaking's Sustainability Statement

Disclosure requirements	Page
ESRS 2 General disclosures	132
BP-1 General basis for preparation of sustainability statements	132
BP-2 Disclosures in relation to specific circumstances	149
GOV-1 The role of the administrative, management and supervisory bodies	132
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	132
GOV-3 Integration of sustainability-related performance in incentive schemes	136
GOV-4 Statement on due diligence	137
GOV-5 Risk management and internal controls over sustainability reporting	138
SBM-1 Strategy, business model and value chain	138
SBM-2 Interests and views of stakeholders	141
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	147
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	144
IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	151
ESRS E1 Climate change	155
E1-1 Transition plan for climate change mitigation	155

Disclosure requirements	Page
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	147
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	144
E1-2 Policies related to climate change mitigation and adaptation	160
E1-3 Actions and resources in relation to climate change policies	163
E1-4 Targets related to climate change mitigation and adaptation	166
E1-5 Energy consumption and mix	166
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	167
E1-7 GHG removals and GHG mitigation projects financed through carbon credits	169
E1-8 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	169
ESRS S1 Own workforce	259
ESRS 2 SBM-2	259
ESRS 2 SBM-3	147
S1-1 Policies related to own workforce	261
S1-2 Processes for engaging with own workers and workers' representatives about impacts	265
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S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	272
S1-6 Characteristics of the undertaking's employees	273
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S1-8 Collective bargaining coverage and social dialogue	274
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Disclosure requirements	Page
S1-14 Health and safety metrics	277
S1-15 Work-life balance metrics	277
S1-16 Compensation metrics (pay gap and total compensation)	277
S1-17 Incidents, complaints and severe human rights impacts	277
ESRS S4 Consumers and end-users	279
ESRS 2 SBM-2 Interests and views of stakeholders	141
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S4-1 Policies related to consumers and end-users	281
S4-2 Processes for engaging with consumers and end-users about impacts	282
S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	283
S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	285
S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	290
ESRS G1 Business conduct	291
ESRS 2 GOV-1 The role of the administrative, supervisory and management bodies	132
ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	291
G1-1 Corporate culture and business conduct policies and corporate culture	292
G1-3 Prevention and detection of corruption and bribery	296
G1-4 Confirmed incidents of corruption or bribery	297
Cybersecurity	301
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	302
Market integrity and financial security	298

Table 81. List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Disclosure Requirement and related datapoint	Appendix B - ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	SFDR Annex I, Commission Delegated Regulation (CDR) (EU) 2020/1816, Annex II	132
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	CDR (EU) 2020/1816, Annex II	132
ESRS 2 GOV-4 Statement on due diligence paragraph 30	SFDR Annex I	137
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Not applicable	Not applicable
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Not applicable	Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Not applicable	Not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv	Not applicable	Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14	Regulation (EU) 2021/1119 Article 2 (1)	155
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	CDR (EU) 2020/1818, Article 6	155
ESRS E1-4 GHG emission reduction targets paragraph 34	SFDR Annex I, Commission Delegated Regulation (CDR) (EU) 2020/1816, Article 449a	166
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Non-relevant information	Non-relevant information
ESRS E1-5 Energy consumption and mix paragraph 37	SFDR Annex I	166
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Non-relevant information	Non-relevant information
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	SFDR Annex I, CDR (EU) 2020/1818, Article 5(1), 6 and 8(1)	167
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	SFDR Annex I, CDR (EU)	167



Disclosure Requirement and related datapoint	Appendix B - ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in
	2020/1818, Article 8 (1)	
ESRS E1-7 GHG removals and carbon credits paragraph 56	Regulation (EU) 2021/1119 Article 2 (1)	169
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	Application of the phased introduction method	Application of the phased introduction method
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)	Application of the phased introduction method	Application of the phased introduction method
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)	Application of the phased introduction method	Application of the phased introduction method
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)	Application of the phased introduction method	Application of the phased introduction method
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69	Application of the phased introduction method	Application of the phased introduction method
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Non-relevant information	Non-relevant information
ESRS E3-1 Water and marine resources paragraph 9	Non-relevant information	Non-relevant information
ESRS E3-1 Dedicated policy paragraph 13	Non-relevant information	Non-relevant information
ESRS E3-1 Sustainable oceans and seas paragraph 14	Non-relevant information	Non-relevant information
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Non-relevant information	Non-relevant information
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Non-relevant information	Non-relevant information
ESRS 2 – SBM-3 – E4 paragraph 16 (a) i	Non-relevant information	Non-relevant information
ESRS 2 – SBM-3 – E4 paragraph 16 (b)	Non-relevant information	Non-relevant information
ESRS 2 – SBM-3 E4 paragraph 16 (c)	Non-relevant information	Non-relevant information
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Non-relevant information	Non-relevant information

Disclosure Requirement and related datapoint	Appendix B - ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Non-relevant information	Non-relevant information
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Non-relevant information	Non-relevant information
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Non-relevant information	Non-relevant information
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Non-relevant information	Non-relevant information
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Non-relevant information	Non-relevant information
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Non-relevant information	Non-relevant information
ESRS S1-1 Human rights policy commitments paragraph 20	SFRD Annex I,	261
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	CDR (EU) 2020/1816, Annex II,	261
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	SFRD Annex I	261
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	SFRD Annex I	261
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	SFRD Annex I	266
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	CDR (EU) 2020/1816, Annex II	277
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	SFRD Annex I	277
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	CDR (EU) 2020/1816, Annex II	277
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	SFRD Annex I	277
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	SFRD Annex I	277
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	CDR (EU) 2020/1816, Annex II	277



Disclosure Requirement and related datapoint	Appendix B - ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Non-relevant information	Non-relevant information
ESRS S2-1 Human rights policy commitments paragraph 17	Non-relevant information	Non-relevant information
ESRS S2-1 Policies related to value chain workers paragraph 18	Non-relevant information	Non-relevant information
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Non-relevant information	Non-relevant information
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	Non-relevant information	Non-relevant information
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Non-relevant information	Non-relevant information
ESRS S3-1 Human rights policy commitments paragraph 16	Non-relevant information	Non-relevant information
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Non-relevant information	Non-relevant information
ESRS S3-4 Human rights issues and incidents paragraph 36	Non-relevant information	Non-relevant information
ESRS S4-1 Policies related to consumers and end-users paragraph 16	SFRD Annex I	281
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	SFRD, CDR (EU) 2020/1816, Annex II CDR (EU) 2020/1818,	281
ESRS S4-4 Human rights issues and incidents paragraph 35	SFRD Annex I,	285
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	SFRD Annex I,	292
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	SFRD Annex I,	292
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	SFRD Annex I, CDR (EU) 2020/1816, Annex II)	297
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	SFRD Annex I,	297

* reference to the Financial Services Sector Sustainability Disclosure Regulation, Pillar 3, the Benchmarks Regulation and the European Climate Law



Climate change (ESRS E1)

Corporate governance

Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

Climate issues are not included in the remuneration of members of the management and supervisory bodies. Information on the inclusion of sustainability topics in the remuneration of members of these bodies is further described in section: General disclosures (ESRS 2), in the section: Integration of sustainability-related performance in incentive schemes (GOV-3).

Strategy

Transition plan for climate change mitigation (E1-1)

Transition plan in the Bank

BNP Paribas Bank Polska S.A. has not developed its transition plan. Bank is a part of the global BNP Paribas Group, which aims to align its credit portfolio with the Paris Agreement, the Bank is fully committed to achieving the BNP Paribas Group's objectives, by taking specific actions within their scope of impact. Therefore, it will among other things aim to achieve the targets related to the highest-emission sectors under the NZBA commitment, which the BNP Paribas Group has set for 2030. In addition, the Bank, like all entities operating within the BNP Paribas Group, is taking a number of measures to support its own Customers in their transformation and to reduce its carbon footprint.

The BNP Paribas Group has set interim targets for reducing the carbon intensity of its credit portfolios in the sectors with the highest greenhouse gas emissions by 2025 and 2030. At the same time, it set targets for reducing greenhouse gas emissions in its own operations (scopes 1, 2 and 3 related to business travel), which can be achieved by improving the energy efficiency of buildings and sustainable mobility.

The Bank's efforts to mitigate climate change

The Bank implements a financing and investment policies that regulate activities in the sectors of the economy with the greatest impact on the environment. The Bank's main leverage as a financial institution is to use its position to support the ecological transition of economic entities. This is our main environmental commitment. To this end, the Bank is consistently developing a range of products, services and other solutions to help our Customers carry out their own ecological transformation and develop their sustainable investments.

These activities at the Bank consist of:

- Integrating climate considerations into its own operations and, in particular, into its analysis of Customers in credit process, investment decision-making, reporting and risk management;

- Limiting support for activities with the greatest negative impact on the environment, i.e. casting aside Customers and projects with the greatest negative impact on the environment in terms of greenhouse gas emissions (in particular in the coal and unconventional oil and gas sectors). It is also a material reduction of credit exposure to greenhouse gas-intensive activities (e.g. oil and gas exploration and production) primarily through dedicated financing and investment policies;
- Increasing support for low-carbon energy. The Bank participates in the financing of energy and ecological transition projects and companies particularly involved in this field, and also offers its Customers appropriate financial products and services: loans linked to sustainable development (SLL), reduced-interest mortgages for more energy-efficient properties or the purchase of less polluting vehicles, etc.;
- Conducting a systematic ESG assessment of its Customers with a turnover exceeding 50 million euros. The ESG Assessment process includes a questionnaire and controversy analysis (i.e. verification of negative information related to the Customers' ESG activities), also covering climate issues. It is carried out at the start of the relationship with the Client and at subsequent stages, such as the annual review. It is now fully integrated into the business financing process and is required for lending. It also provides a deeper understanding of clients' ESG expertise (practices, maturity level, risks incurred by clients and their potential impact) and assesses compliance with sector policies. The Bank also carries out an ESG risk assessment process.

The goal at the level of the BNP Paribas Group is that by 2030, low-carbon energies, primarily renewables, must represent at least 90% of the Group's financed energy mix. Since 2023 the BNP Paribas Group no longer provides any financing under any conditions to new oil or gas field development projects and will reduce its outstanding loans for oil exploration and production by 80% and 30% respectively by 2030 compared to September 2022.

The Bank has also taken steps to create develop a systemic approach to decarbonisation including defining possible actions to support it. In 2024, the Bank performed a decarbonisation analysis of its portfolio based on the PCAF methodology (taking into account data availability and quality). As a result of the analysis, the Bank has identified priority sectors: which have the greatest impact on emissions and which will require the most support for decarbonisation investments:

- energy sector,
- food processing and agriculture sector,
- transport, shipping and logistics sector,
- industry (wood processing, chemicals, rubber and plastics, non-metallic products, metal production, metal products).

The Bank has also identified the largest GHG emitters in its portfolio. As part of the activities mentioned above, decarbonisation opportunities and levers are identified, as well as tools and systemic solutions to decarbonise the aforementioned sectors. Based on these activities, the Bank is planning commercial activities and preparing a product offering. In addition to financing, the Bank also offers national or EU support instruments. Combined with the banking products offered, they benefit C customers and support them in undertaking decarbonisation and transformation activities, while reducing costs, energy consumption, decarbonising and increasing Customers' competitive advantages.



Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Material climate-related impacts, risks and opportunities for the Group

As part of its double materiality assessment, as described in section: Description of the process to identify and assess material impacts, risks and opportunities (IRO-1), General disclosures (ESRS 2) part, the Bank identified a number of climate-related material impacts, risks and opportunities (IROs).

Material impact related to climate change mitigation and related to the Bank's business activities:

- Indirect climate impacts through the financing of Customers that emit greenhouse gases.

Material risks related to adaptation to climate change and related to the Bank's business activities:

- Credit risks arising from an increase in extreme, acute and chronic weather events (droughts, heat waves, floods, etc.).

Material climate change mitigation risks related to the Bank's business activities:

- Credit risks arising from stranded assets or declining activity in certain sectors exposed to transition risks.
- Reputational risks related to accusations of pseudo green marketing and financing of sectors with high GHG emissions.

Material opportunity related to climate change mitigation and linked to the Bank's commercial activities:

- Opportunity related to providing sustainable products and services that promote Customers' transition to a low-carbon economy.

Material opportunities related to climate change mitigation and linked to the Bank's own operations:

- A reduction in the carbon footprint of the Group's own operations can lead to cost reductions, an improvement of the Group's image and increased employee awareness.

Summary of links between material IROs, policies, actions, metrics and targets

Table 82. Links between IROs, policies, activities, actions, metrics and targets in the Group

Category	Material IROs	Policy	Actions	Metrics and targets
Impacts	Greenhouse gas emissions of Customers			
Risks	Credit risk arising from physical risk	<ul style="list-style-type: none"> • GOBeyond Strategy • Sectoral policy - Oil and Gas • CSR policy towards the mining sector • CSR policy towards the coal power sector • CSR policy towards the nuclear sector • CSR policy towards the agri-food sector 	<ul style="list-style-type: none"> • Implementation of ESG risk assessment and its use in the KYC / credit process 	
	Credit risks arising from transition risks			
Reputational risks				
Opportunities	Financing the low-carbon transition		<ul style="list-style-type: none"> • Supporting our Customers in the transition to a low-carbon economy 	<ul style="list-style-type: none"> • Share of sustainable financing amounting to 10%
	Reduction of direct greenhouse gas emissions	<ul style="list-style-type: none"> • Energy management of buildings • Business Travel Policy 	<ul style="list-style-type: none"> • Initiatives to decarbonise own operations 	<ul style="list-style-type: none"> • Direct greenhouse gas emissions in the Group Target for 2025: reduction in CO₂ emissions from operations - 55% and reduction in energy consumption - 35%



At the same time, the Bank recognises that environmental risks can materialise through:

- physical risks related to environmental degradation, e.g. air, water and soil pollution, deforestation (these phenomena can lead, for example, to damage to infrastructure, destruction of crops, reduced productivity or indirectly lead to consequences such as disruptions in the supply chain), as well as climate change, including the occurrence of:
 - extreme weather events such as storms, floods, fires and heatwaves, which can damage production facilities and disrupt supply chains,
 - long-term climate change, which can lead to, among other things, rising temperatures, changing rainfall patterns and types of precipitation, rising sea levels, limited water availability, loss of biodiversity and changes in soil productivity.
- transition risk arising from the need to adapt the economy to gradual climate change, in particular the use of low-carbon and more environmentally sustainable solutions. This risk may materialise, among other things, through:
 - regulatory risk (changes in climate and environmental policy, e.g. as a result of energy efficiency requirements, carbon pricing mechanisms that increase the price of fossil fuels, or policies that encourage the sustainable use of environmental resources),
 - technological risk (a less harmful technology for the climate or the environment replaces a more harmful one, making it obsolete),
 - changes in market sentiment and social norms (changes in Consumer and investor choices, difficulties in maintaining relationships with Customers, employees, business partners and investors due to the reputation of a company that has a negative impact on the climate and the environment).

Description of the resilience of the strategy and business model

The Bank's Internal Capital Adequacy Assessment Process (ICAAP)

Within the framework of the principles of risk identification and assessment developed by the Bank, a separate group of risks related to environmental, social and corporate governance factors was identified. In the risk identification process, the material impact of ESG factors was recognised. As a result of the above, the Bank has incorporated ESG risks into its internal risk management framework. In order to mitigate and control the risks, principles for measuring ESG risks in the Bank's Internal Capital Adequacy Assessment Process (ICAAP) have been developed. The capital plan for 2025-2027 was supplemented with limits for ESG risk set based on the risk measurement performed. ESG Risk Management Principles have also been developed, which include i.a. provisions for risk monitoring and reporting and stress testing.

Scenario analysis at the Bank

The Bank conducts climate stress tests on a two-year cycle. The first tests were conducted in 2023. Further tests are planned for 2025. The test methodology is rooted in the stress test approach proposed in 2022 by the European Central Bank. The analysis takes into account those physical and transition risks that are material from the perspective of the Bank's current situation. The Bank assumes that the short-term perspective is a period of up to 1 year, the medium-term perspective is 1–5 years, and the long-term perspective is longer than 5 years.

The Bank's approach to the tests carried out is presented below:

Type of risk	Scenario	Horizon	Risk factors	Risk transmission channel
Physical risk	Droughts and heatwaves	1 year	• Temperature increase by 2°C	• Impact on financial metrics, a change in which leads to a reassessment of the Customer's rating
		1 year	• Temperature increase by 3°C	
	Floods	1 year	• River flood • Coastal flood	• Impact on financial metrics, a change in which leads to a reassessment of the Customer's rating • Change in the value of collateral
Transition risk	Orderly transition	Long-term i.e. 20 years (in five-year intervals)	• Changes in CO ₂ emission allowance prices • GDP	• Impact on financial metrics, changes in which lead to a reassessment of the Customer's rating
	Disorderly transition			
	Hot house world			
	Short-term	3 years	• Paths of CO ₂ emission reduction according to scenarios	• Stimulation of the balance sheet structure in the long term

The purpose of the tests carried out in 2023 was to gain a specific understanding of the sensitivity of the loan portfolio to climate risks and to assess the Bank's preparedness to perform this process, in order, among other things, to take climate risk factors into account in the standard stress testing process. The assessment of the reliability and availability of data for conducting the tests was also crucial for the bank. The results were of a cognitive nature and were not included in the risk management processes. The test results indicate that a lack of action on the part of Customers in terms of transition risk management can have a material impact on the level of risk, including the occurrence of credit losses. In terms of physical risk, flooding is a key risk factor for the Bank.

The Bank is also carrying out an analysis of individual economic sectors in terms of their potential for transformation. The table below presents the credit exposure by Polish Classification of Activities (PKD) section, together with a breakdown of



the likelihood of energy transition failure/delay. The result is presented on a colour scale from green to red, where green represents the lowest probability and red the highest probability of energy transition failure/delay.

The probability of a delayed/unsuccessful transition is estimated on the basis of:

- the emission intensity of a given economic sector (according to PKD codes),
- the rate of energy transition adopted in the climate scenarios,
- the impact of individual scenarios on the financial performance of companies, obtained from the Bank's climate stress tests.

The calculations are carried out at the level of PKD classes and then aggregated to the section level as a weighted average, where the credit exposure in each class is used as weights.

The Network for Greening the Financial System (NGFS) climate scenarios were used in the analysis, i.e.:

- Orderly transition scenario ('net zero 2050') - the scenario assumes that climate neutrality is achieved by 2050 and global warming is limited to less than 2°C. This is possible through the implementation of appropriate climate policies as early as 2020 and their consistent implementation in the following years. Early action on decarbonisation leads to a reduction of both physical and transition risks;
- Disorderly transition ('delayed transition') scenario - the implementation of relevant climate policies only takes place after 2030. Achieving climate neutrality by mid-century is still possible, but requires intensified decarbonisation efforts, faster action and thus higher transition costs;
- Current policies scenario - assumes that no climate policies are implemented beyond those already in place. Global emissions continue to rise, leading to a warming of more than 3°C by the end of this century. The risk of transition in this scenario is low, but it leads to the materialisation of physical risks.

In the context of the analysis below, the scenarios presented are considered over a 20-year horizon.

Table 83. Analysis of selected economic sectors in terms of their potential for transformation

PKD section	Balance sheet exposure of the Group as of 31.12.2024 (PLN million)	Likelihood of failure/delay of energy transition		
		Net zero 2050	Disorderly transition	Current policies
Agriculture, forestry, hunting and fishing	9,324.9	Orange	Red	Green
Mining and quarrying	48.2	Orange	Orange	Green
Manufacturing	12,080.9	Orange	Orange	Green

PKD section	Balance sheet exposure of the Group as of 31.12.2024 (PLN million)	Likelihood of failure/delay of energy transition		
		Net zero 2050	Disorderly transition	Current policies
Electricity, gas, steam, hot water and air conditioning manufacturing and supply	958.6	Red	Red	Green
Water supply; sewerage, waste management and remediation activities	147.1	Red	Red	Green
Construction	2,055.3	Green	Yellow	Green
Wholesale and retail trade; repair of motor vehicles including motorcycles	7,551.0	Green	Yellow	Green
Transportation and storage	2,715.3	Yellow	Yellow	Green
Accommodation and food service activities	322.9	Green	Green	Green
Information and communication	2,757.4	Yellow	Yellow	Green
Financial and insurance activities	5,897.6	Green	Green	Green
Real estate activities	6,005.9	Yellow	Yellow	Green
Professional, scientific and technical activities	3,082.2	Yellow	Orange	Green
Administrative and support service activities	1,644.2	Yellow	Yellow	Green
Public administration and defence; compulsory social security	92.6	Green	Orange	Green
Education	76.6	Green	Green	Green
Human health and social work activities	1,147.5	Yellow	Yellow	Green
Arts, entertainment and recreation activities	17.6	Yellow	Yellow	Green
Other service activities	103.3	Yellow	Yellow	Green

Resilience of the Bank's business model

In terms of risk management the Bank carries out stress tests. It has developed methodologies related to the consideration of ESG issues and their impact on credit risk. In this way, the Bank identifies risks that it naturally hedges by allocating sufficient capital to cover potential losses arising from the potential materialisation of these risks. At the same time, the Bank has, for a long time, through sectoral policies and the analysis of controversies, been introducing restrictions in its core business. Their aim is to avoid material exposure to sectors and companies that will be most affected by climate change - whether through the materialisation of physical risks or risks of transition.



At the same time, the Bank has defined in its strategy and successively operationalised its strategic aspirations for sustainable financing, which aims to support our Customers in their transformation processes. Sustainability commitments are an integral part of GObeyond's strategy, forming one of its four pillars - POSITIVE. According to it, the Bank is committed to developing sustainable products. The value of sustainable finance is one of the three most important strategic indicators alongside return on capital and the cost-to-income ratio. As a result, it also allows for the reduction of ESG risks within the financed portfolio and the reduction of greenhouse gas emissions.

The Bank is consistently increasing the share of sustainable financing in the total financing volume, taking into account its various aspects: this not only includes renewable energies and energy efficiency, but also financing for low-emission construction and the provision of financing in the form of Sustainability Linked Loans (SLL). In the case of SLL financing, the Bank uses standard general-purpose financing, identifies goals and metrics in cooperation with the Customer, taking into account important aspects from the point of view of sustainable development for the Customer, and defining ambitious transformation goals, rewarding the Customer for increasing their resilience to climate change or taking action to combat climate change.

In order to limit the negative impact of ESG risks, the Bank's credit policy supports activities related to reducing energy consumption, thermo-modernisation of buildings, and increasing the efficient use of other key resources, such as water. The Bank acts proactively in this area by seeking out and establishing partnerships, thus supporting innovative entities whose products or solutions can generate a positive impact. The Bank's assistance is not limited to providing financing to such institutions. The Bank offers professional support by facilitating contact with business partners, as well as through direct investment in innovative company. Financing in the sustainable and green economy sector is additionally supported by a formal catalogue of products and investment types with a positive impact, which has been in force since 2020 and entitles to preferential internal transfer pricing. This allows for a material strengthening of the competitiveness of sustainable offers.

At the same time, the Bank recognises the value and opportunities in collaborating on sustainable development with the public sector and development banks. The Bank's experience to date shows that such collaboration can contribute to a material increase in the scale and maximisation of the use of public funds allocated for transformation. Examples of such joint activities include the 'Clean Air' project, which finances the thermal modernisation of houses, ELENA, which subsidises energy audits among companies, PF4EE Programme, and the BiznesMax guaranteed loan for innovative (including sustainable) investments. For more information, see GObeyond Strategy Implementation, Pillar POSITIVE.

The Bank does not engage in projects that significantly increase the risk of climate-related changes and/or are significantly exposed to the effects of climate change by limiting or completely ceasing to finance such initiatives, as specified, among other things, in the CSR sector policies. One indication of the implementation of this policy is the decision to completely cease financing and cooperation with Customers involved in coal mining and combustion by 2030 (for OECD countries).

The Bank's strategy focuses on opportunities and ensuring resilience against threats that may have a financial impact on the Bank, including strategic planning and risk management, but also non-financial impacts. The proper management of climate-related risks represents a strategic opportunity for the Bank. The aforementioned opportunities are primarily related to reducing the exposure of the Bank's assets to climate change-related risks, including taking a long-term perspective of mitigating material risks before they start to have an adverse impact. In addition, the Bank's activities

contribute to saving resources, including the use of more efficient modes of transport and production and distribution processes, recycling, more efficient buildings and reduced water consumption. Skilful use of opportunities allows for the reconstruction of business models and modernisation of technologies, including the use of low-carbon energy sources, the development of low-carbon goods and services, the development of solutions for adaptation to climate change, the development of new products or services through research and development and innovation. The measures the Bank is taking are aimed at ensuring that the business model is resilient to climate change.

Management of impacts, risks and opportunities

Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1)

The Group has identified the sources of greenhouse gas emissions in its own activities and since 2019 measure and publish them in its annual reports. Starting from 2024, it also measures the greenhouse gas emissions in its portfolio. For more information, see Targets related to climate change mitigation and adaptation (E1-4) and Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6).

The climate stress tests conducted by the Bank in 2023 aimed to identify potential vulnerabilities to transition-related climate risks, both in the short term in the event of a disorderly transition and in the long term.

Description of processes and assessment of climate-related risks

As part of the risk assessment to comply with the European Banking Authority (EBA) requirements for originating and monitoring loans, the Bank in 2021 developed ESG assessment questionnaires, which were implemented in the credit process. Through these questionnaires, the Group verifies whether Customers are aware of the risks associated with the materialisation of ESG risks and take precautionary measures. Among other things, this assessment aims to identify the negative impact of physical and transition risks on Customers' activities. In addition, as part of the ESG assessment, the Bank verifies whether Borrowers have implemented or plan to implement solutions to protect their business from the negative effects of climate change, including:

- use of electricity from renewable energy sources, implementation of a plan to reduce greenhouse gas emissions,
- implementing a plan to reduce water and electricity consumption or diversify into renewable energy,
- taking measures to reduce the impact of climate change on its business.

The Bank's approach to ESG risk analysis focuses on assessing two perspectives:

- impact materiality, i.e. the impact of business activities on the environment,
- financial materiality, i.e. the impact of the environment on the business activities.

Based on the data collected in the lending process, the level of ESG risk of the Bank's Customers, including climate risk, is examined when new financing is granted, increased or the Customer is reviewed. After aggregating the results, according to



the data at the end of 2024, the exposure-weighted average score of the loan portfolio subject to analysis achieved a low level. Drought, heat waves and the impact of heavy precipitation (rain, snow, hail, ice) dominate among the physical risk factors most frequently indicated by Customers. 14% of Customers declare sensitivity to any type of physical risk.

According to the Risk Management Strategy, ESG risk is the risk of losses resulting from the current or future negative impact of environmental, social or governance factors on the Group's counterparties or invested assets. This includes environmental risk, which is the risk arising from exposure to counterparties that may be adversely affected by environmental factors, including factors arising from climate-related changes and factors related to environmental degradation.

The Group's climate risk management process is set out in the ESG Risk Management Principles. The Principles synthesise the actions taken in the area of ESG management, in the context of the impact on the Bank's credit risk and internal capital. By defining its risk appetite, the Bank limits its exposures to Customers with high ESG risk. The designated risk appetite aims to determine the level of risk that the Bank is prepared to accept in pursuit of its strategic objectives and financial plans. The level of ESG risk should be assessed as low.

In order to manage risks related to climate change, the Bank has incorporated into its lending and monitoring process an assessment of the impact of long-term climate-related changes and extreme weather events on Borrowers' activities, in line with a systematisation that introduces a division into:

1. Long-term climate-related changes:

- impact of higher temperatures (air, freshwater, seawater),
- impact of thermal shocks, impact of changing wind patterns,
- impact of changing precipitation patterns and types (rain, hail, snow),
- impact of sea level rise,
- impact of water stress (limited access to fresh water),
- impact of soil and coastal erosion/degradation.

2. Extreme weather events:

- impact of heat/cold waves, droughts/floods, fires, storms, tornadoes heavy precipitation, landslides, etc.

The above categories were ranked according to the materiality of these risks, estimated on the basis of Customers' responses obtained in the ESG questionnaires. In addition, special attention was paid to the risks that are regionally most specific to Poland, i.e. droughts, heat and floods. These categories were included in the climate stress tests conducted at the Bank in 2023.

The breakdown of these risks was implemented on 30 June 2021, with the entry into force of the EBA/GL/2020/06 Guideline of 29 May 2020 on originating and credit monitoring. In determining the types of risks, the Bank followed the guidelines set

out in the EBA Report on the Management and Supervision of ESG Risks for Credit Institutions and Investment Firms (EBA/REP/2021/18), as well as the types of risks indicated in the Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 on the disclosure of information on environmental, social and corporate governance risks.

As part of the risk assessment, the Bank's Customers' vulnerability to transition risks (transition towards a climate-neutral economy) is also analysed. The Bank pays particular attention to the financing of sectors deemed sensitive in terms of ESG risk (including climate risk) and limits its participation in industries widely regarded as particularly damaging and unsustainable.

The Bank's exposure to high-carbon sectors amounts to PLN 11.9 billion, down 6% year-on-year. High-carbon sectors are defined according to the leading PKD codes of companies' activities and include the industries indicated in the table below.

Table 84. Percentage of high-carbon sectors in the Group's credit portfolio as at 31.12.2024 (for non-financial corporates)

Sector	%
car	0.8%
aviation	0.0%
cement	0.2%
coal	0.0%
oil and gas	0.1%
energy	0.9%
ships and water transport	0.1%
steel manufacturing and processing	0.9%
agriculture	11.1%
Total	14.1%

Policies related to climate change mitigation and adaptation (E1-2)

Policies related to the Group's financing and investment activities

The Bank's financing and investment activities are governed by sectoral policies in relation to sensitive sectors (<https://www.bnpparibas.pl/csr/strategia-csr/gospodarka>). Five of these are directly related to climate change.:

- CSR policy towards the coal power sector,
- Sector policy - oil and gas,
- CSR policy towards the mining sector,
- CSR policy towards the nuclear sector,
- CSR policy towards the agri-food sector.

By limiting the Bank's exposure to carbon-intensive sectors, these policies also limit financial risks.



These policies, developed by the BNP Paribas Group, are continuously inspired by its interaction with its stakeholders, including investors, NGOs, etc., or through the good practices of international or sectoral bodies.

Policies regarding the Group's own activities

The Group's approach, with regard to its direct impact on the climate, is one of continuous improvement and includes:

- adjusting energy consumption to reduce demand for energy,
- energy efficiency (more efficient production, transport and use of energy),
- use of energy from renewable sources.

The Bank has adopted a CSR Declaration for Suppliers, which is available to all suppliers. It is intended to ensure that the requirements and principles set out in it, in particular with regard to the environment, are observed by subcontractors. Similar documents are also in place at the other companies within the Group.

At the Bank, two documents were developed and subsequently adopted by the Management Board in 2024 to regulate environmental and climate approaches:

- Integrated Environmental and Energy Management System,
- BNP Paribas Bank's Environmental and Energy Declaration.

The documents came into force on 1 January 2025. The Bank also has a business travel management policy, in which it recommends to apply best practices for reducing CO₂ emissions, which contributes to reducing the impact of its activities.

Table 85. Summary of the Bank's main policies for managing impacts, risks and opportunities related to climate change mitigation and adaptation

Policies	Description of the content of the policy	Description of the scope of the policy or its exclusions	Description of the highest level of the organization responsible for implementing the policy	Interaction with stakeholders
Sectoral Policy – Oil and gas	The document sets out the commitments made by the Group in its financial relationships with companies in the oil and gas sector. It sets out the framework for financing arrangements, defines the criteria for granting financing and identifies sector exclusions.	This Policy applies to all BNP Paribas entities and covers all financial products and services provided by BNP Paribas	Management Board of the Bank	Publication on the Bank's website
CSR policy towards the mining sector	The document sets out the commitments made by the Group in its financial relationships with companies in the mining sector. It sets out the framework for the terms of project financing or the granting of credit, the criteria for establishing the relationship and the exclusions (geographical location, type of project, relation to thermal coal, etc.).	This Policy applies to all entities of the BNP Paribas Group and covers all financial products and services provided by the Group	Management Board of the Bank	Publication on the Bank's website
CSR policy towards the coal energy power sector	The document sets out the commitments made by the Group in relation to the financing of companies in the coal-fired power generation sector. In particular, it sets out the timetable for a complete exit from thermal coal financing.	This Policy applies to all entities of the BNP Paribas Group and covers all financial products and services provided by the Group	Management Board of the Bank	Publication on the Bank's website
CSR policy towards the nuclear sector	The document sets out the commitments made by the Group in relation to the financing of companies in the nuclear power generation sector. It sets out the principles and evaluation criteria relating to the financing of nuclear power plant projects and in connection with financial services for companies in this sector.	This Policy applies to all entities of the BNP Paribas Group and covers all financial products and services provided by the Group	Management Board of the Bank	Publication on the Bank's website
CSR policy towards the agri-food sector	The document sets out the commitments made by the Group in relation to the financing of companies in the agricultural sector. It sets out the criteria for financing projects in the sector, but also the requirements for companies in the sector with which the Group may come into contact.	This Policy applies to all entities of the BNP Paribas Group and covers all financial products and services provided by the Group	Management Board of the Bank	Publication on the Bank's website



CSR Declaration for suppliers	<p>The document describes the mutual ESG commitments made by the Group and its suppliers. The declaration summarises the suppliers' commitments, such as: compliance with ethical principles, working and safety conditions, regulations on the employment of young people, the fight against forced labour, discrimination and environmental protection.</p>	The declaration applies to the activities of the Bank. Appropriate regulations have been implemented in the Bank's companies in accordance with the principle of proportionality	Vice-President of the Bank	The declaration is provided to each supplier during the supplier assessment process. Publication on the Bank's website
ESG/CSR declaration of the Partner (Agent, Contractor, Vendor) on responsible cooperation	The declaration summarises the commitments of partners, such as: compliance with ethical principles, working and safety conditions, regulations on the employment of young people, the fight against forced labour, principles of discrimination and environmental protection.	The declaration concerns the activities of the Bank	Executive Director of Sustainable Development Area	The declaration is communicated to each partner before signing the contract. Publication on the Bank's website
Policy on integrated environmental and energy management at BNP Paribas Bank Polska S.A.	The objective of the Policy is to minimise the negative environmental impact resulting from the Bank's operations through responsible environmental management and optimisation of energy consumption (electricity, heat, gas, fuels) and water consumption. The Bank wants to manage its environmental impact in a systematic way, implementing a long-term strategy of continuous improvement and reduction of negative environmental impacts.	The declaration concerns the activities of the Bank	Managing Director of the Bank's Internal Services Division	Internal document
BNP Paribas Environmental and Energy Policy	The declaration describes the Bank's activities in the environmental area: managing the environment and energy, supporting Customers in the transition to a low-carbon economy, reducing the negative impact of operations on the environment and the energy consumed, raising awareness for the environment. It also takes into account the Bank's environmental commitments.	The declaration concerns the Bank's activities	Managing Director of the Bank's Internal Services Division	The declaration will be published on the Bank's website
BNP Paribas Polska - Travel Policy	This document describes the principles to be followed by employees in managing their business travel, in particular by encouraging them to reduce their environmental impact.	Policy is applicable to the activities of the Bank	Managing Director of the Bank's Internal Services Division	Internal document



These policies limit the Bank's physical or transformational risks while minimising its impact on the most carbon-intensive activities, projects and sectors. They also allow investments to be targeted towards opportunities that contribute to climate commitments.

Actions and resources in relation to climate change policies (E1-3)

The Bank measures the effectiveness of its activities in reducing the GHG emissions of its contractors and in its own operations:

- The Bank has implemented an ESG risk assessment [see Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) in section: General Disclosures (ESRS 2)], thereby improving knowledge of Clients and their impact on climate change. It allows for a better understanding of the Bank's risks and more effective support to Clients in the transformation;
- The Bank supports its Customers in the transition to a low-carbon economy through a range of sustainable products and services, as outlined in GO beyond Strategy Implementation, Pillar POSITIVE;
- From 2024, the Bank monitors the emission intensity of loan portfolios in carbon-intensive sectors;
- The Bank implements solutions to reduce greenhouse gas emissions from its own activities.

Climate risk management activities

Assessing Customers' climate efficiency

The application of sectoral policies is complemented by lists of monitored and excluded companies, depending on the degree of non-compliance with the policies. Companies on the list of monitored companies are subject to the Bank's actions to implement sustainable changes in their practices and to reduce the level of ESG risks, with a particular focus on climate change issues. For excluded companies, the Group prohibits the Bank from entering into financial or investment cooperation. At the Bank, we carry out ESG risk assessments of our Clients, taking into account climate risks. In 2024, 24,164 ESG risk assessments were carried out. At the same time, 251 Customers operating in sensitive sectors were analysed on the basis of sector policies.

In 2024, the ESG Assessment process was extended by corporate Customers with an annual turnover of more than EUR 50 million, operating in industries with high risks related to the transition to a low-carbon economy or high social risks. In 2024, a total of 130 Customers were analysed under this process. The ESG Assessment process is also used to better understand our Customers' sustainability transformation and their strategies in relation to climate change.

The Bank's climate impact activities

Supporting Customers in decarbonisation

In 2024, the Bank has taken action on its approach to decarbonisation. Materials have been prepared on the sectors identified as priorities and a synthesis of decarbonisation levers has been developed with a detailed analysis of the agri-

food sector. The Bank is already supporting companies in decarbonisation through profiled tools. One of these is Envirly's carbon footprint estimation platform. In partnership with Envirly, the Bank enables companies to use a certified tool that allows them to estimate the carbon footprint of their operations, according to current standards. The Bank has also taken steps to expand its support for Customers in financing sustainable assets through Customers' special purpose vehicles (SPVs) and to develop its product.

To support the decarbonisation of our Customers' supply chains, primarily in the agri-food sector, the Bank has started working with Klim GmbH. Thanks to the regenerative agriculture practices implemented by Klim GmbH, food producers can noticeably reduce greenhouse gas emissions in their supply chains (scope 3). Regenerative practices help to reduce eCO₂ emissions, which contributes to the achievement of Scope 3 targets (indirect emissions) in sustainability strategies. Regenerative agriculture contributes to capturing carbon dioxide from the atmosphere, soil fertility and biodiversity. This leads to more resilient ecosystems and crops. It also increases soil water retention, which reduces erosion and the need for irrigation. In the long term, regenerative agriculture reduces production costs, increases yields and opens up new sources of income for agricultural producers.

Collaborating with Klim GmbH enables farmers to generate carbon credits in the value chain (insetting) by reducing emissions and sequestering carbon. Food producers who engage in sustainable regenerative agriculture can gain the opportunity to promote their business. They contribute to the global fight against greenhouse gases emissions and can use this advantage when talking to investors and business partners. Klim GmbH also offers tools to count, monitor and verify the impact of regenerative agriculture practices on emissions.

The Bank is committed to developing its products and services for the transformation of agricultural production in sustainable direction. Agriculture is key to addressing environmental (e.g. carbon emissions, biodiversity loss, water use, deforestation) and social challenges. It is both highly vulnerable to climate change and a key lever for solutions (sustainable agroecological practices, renewable energy, soil CO₂ capture). The Bank is committed to developing the skills of its teams, as well as products and services to support the transition to sustainable agriculture. A centre of expertise for the agri-food sector 'BNP Paribas International Food & Agri' has been created at the Bank to support the other entities in the BNP Paribas Group. This centre has developed and launched the [Agronomist.pl](#) platform, which offers, among other things, a toolkit to facilitate the agroecological transformation of agri-food producers and companies, examples of good practices and an innovative solution related to reducing the environmental impact of the agri-food sector. This knowledge is shared across the BNP Paribas Group within the Sustainable Agriculture community, which brings together all the teams responsible for agriculture in European markets.

The main decarbonisation levers prioritised in the Bank's financing within this sector are:

- healthy soils as a key to the transition to a sustainable agricultural model,
- support for the development of the agro-photovoltaic and on-farm photovoltaic market,
- support for the development of the biogas/biomethane and fermentation chambers market.



Membership in industry organisations and sustainability partnerships.

The Bank seeks competences and systemic science-based solutions to decarbonise the real economy. For this purpose, we enter into strategic partnerships:

- Partnership with the European Investment Bank (EIB) supporting energy efficiency projects,
- Membership of the Polish Sustainable Investment Forum (PSIK), which advocates for green initiatives and sustainable financing,
- UN Global Compact, including the Climate Positive programme, which supports climate action and the UN Sustainable Development Goals,
- The Responsible Business Forum, which promotes social responsibility and supports sustainable development,
- Partnership with the UNEP/GRID Centre, supporting environmental action and the Sustainable Development Goals,
- Association for Sustainable Agriculture and Food in Poland (ASAP), which promotes sustainable agricultural practices.

The Group's activities on climate-related opportunities

Introduction of activities related to business opportunity

According to the World Energy Outlook published by the International Energy Agency in 2024, global investments in the energy sector are expected to exceed USD 3 trillion for the first time in 2024. About USD 2 trillion is expected to be spent on clean energy technologies and infrastructure, almost twice the amount dedicated to new oil, gas and coal supply combined. In the NZE scenario, low-carbon energies will represent more than 95% of investments by 2035, totalling USD 5.2 trillion. To meet these challenges and make the changes, investments will be needed from companies, institutional investors and the public sector. By helping its Customers in transition to a low-carbon economy, the Bank is convinced that it can take action for the environment and a sustainable economy, while ensuring solid and sustainable results in the long term.

These opportunities are reflected in the GO beyond Strategy for 2022-2025 and in the Bank of Green Changes programme, and are particularly evident in the commitment to supporting Customers in the transition to a low-carbon economy. The Bank has defined a strategic target for the share of sustainable financing, as set out in the GO beyond strategy, which is 10%. In 2024, the value of the sustainable financing portfolio amounted to PLN 10.2 billion, representing an 11.6% share of sustainable financing. Details are described in the chapter GO beyond Strategy Implementation, [Pillar POSITIVE](#).

Activities related to emissions covered by the operational scope

The Bank is taking steps to reduce its direct environmental impact and to lead by example and raise awareness among its employees. Since 2019, it has been measuring energy consumption and operational greenhouse gas (GHG) emissions

(Scope 1, Scope 2 and Scope 3 for business travel) and progressively reducing them, through the reduction of energy consumption related to premises, IT equipment and business travel, as well as the use of low-carbon energy.

Use of low-carbon electricity

In order to further reduce its environmental impact, the Group has been increasing its share of low-carbon electricity for several years. In 2024, electricity from renewable sources accounted for 100% of total energy consumption. It comes from the purchase of electricity certificates from renewable sources or from the direct consumption of renewable energy produced by the Group's buildings. The total energy consumption was 38,937 MWh in 2024. The consumption of purchased thermal and electrical energy alone in the Group amounted to 70,651 GJ compared to 104,373 GJ in 2023, which means a decrease of 32%.

These measures allow to reduce the CO₂ emissions associated with the Group's electricity consumption, which is taken into account in the market-based approach. In 2024, GHG emissions from Scope 1, 2 and 3 (Category 6) amounted to 8,280 tCO₂e, a decrease of 18% compared to 2023. According to the target defined in GO beyond's 2022-2025 strategy for its own operations, GHG emissions in 2025 should fall to 9,067.05 tCO₂e, meaning that this target has been achieved.

Initiatives for responsible investment in real estate

In order to reduce its environmental impact in the long term, the Group is improving its methods of operating and maintaining its facilities. Programmes are also being implemented to promote the purchase of sustainable and less energy-intensive equipment.

Actions taken at the Bank to reduce the carbon footprint of buildings

In addition to the use of green energy, the Group is successively installing photovoltaic installations at Customer Centres - on buildings owned by the Bank. At the end of 2024, 23 photovoltaic installations were in operation.

The Group is minimising energy consumption by introducing eco-initiatives - in addition to using renewable energy sources, it is paying attention to energy-saving solutions. It is replacing lighting with LEDs (99% both in external signage and in the Bank's locations), successively replacing storage water heaters with instantaneous water heaters. In 13 locations there have been launched remotely controlled heat pumps, or miniBMS management systems controlling the schedule of the most energy-intensive installations in the network locations. At the central locations, the Group is optimising operations for the HVAC system (heating, ventilation, air conditioning) using the BMS (Building Management System). The waste is segregated at 85% of locations.

The Group also raises awareness among employees on a daily basis.

Environmental certification

In 2024, the Bank began ISO 14001 and ISO 50001 environmental certification, which will cover the Bank's head office and 10 locations.



Sustainable IT initiatives

The Sustainable IT Policy defines ten principles that apply to IT in the Bank. Among the objectives pursued by New Technology and Cybersecurity Area are:

- reducing the carbon footprint,
- implementing new projects in line with sustainable IT. Various decarbonisation levers are used to achieve these objectives:
 - operating IT according to a ‘sustainable by design’ approach,
 - raising awareness of environmental issues among all employees,
 - making improvements to IT-managed equipment (Data Centre infrastructure, employee equipment) in order to, i.a. increase energy efficiency,
 - creating, maintaining and developing IT systems with a view to reducing the harmful environmental impact of IT infrastructure and operations, as well as IT systems.

At the Bank, the reduction of the carbon footprint associated with digital channels, marketing activities, communications and IT processes, are taken into account. The Bank also takes into account environmental objectives when conducting its technological transformation, in particular:

- moving part of IT ecosystem to the cloud and working with suppliers that have data centres with a zero carbon footprint (certified by renewable energy certificates), which allows us to reduce our carbon footprint in the energy supply chain for IT hardware by 20%,
- upgrading, consolidating and virtualising equipment in the Data Centre,
- shifting equipment management to a circular economy approach. The Bank wants to track the life cycle of equipment to reduce the amount of waste generated during its life cycle (e.g. reuse of IT equipment). In 2024, employees repurchased
- 2,956 pieces of IT equipment (mobile phones, laptops, PCs, monitors) under the implemented policy. 248 pieces of equipment (monitors, PCs, laptops, printers) were donated to charitable organisations,
- defining environmental criteria for IT purchases - in the tender proceedings in the field of New Technologies and IT Support, energy consumption assessments were introduced as qualitative elements of the criteria, e.g. in the disk array procedure, the weight of the metric in the area of energy demand (power supply and cooling) was 10%,
- equipment that is unusable is handed over to a specialised company for disposal. In 2024, more than 5,000 pieces of IT equipment were donated to Elektrozlom.pl by the Bank,
- the use of certified and recycled paper for printing equipment at the Bank as well as in mass correspondence.

Business travel initiatives

In 2024, the organisation carried out a series of analyses to identify trends in the organisation. The Group has implemented initiatives to reduce the number of business travels and promote sustainable mobility. It is also implementing initiatives that support alternative means of transport. Examples include the challenge ‘Swap your taxi for a healthy walk’ and measures to promote micro-mobility, such as the promotion of commuting by bike and the ‘mobility hub’, where electric bikes are available to employees at headquarters during the summer months. In 2025, employees will be able to use a solution that allows them to buy tickets for public transport for business purposes in a cashless and settlement-free manner.

Initiatives for sustainable mobility

As part of the electrification of the fleet in 2024, the number of owned environmentally friendly cars increased by 238 cars. Currently, the fleet with alternative drive systems consists of 1,061 cars (in 2023 – 823), including 950 hybrid cars and 111 fully electric cars. In this respect, the Bank is the leader among banks in Poland, which is also confirmed by the Eco Fleet award in the ‘Most Environmentally Friendly Fleet’ category. The transition to electric cars implements the environmental objectives from the GO beyond Bank’s 2022-2025 strategy and the updated electrification strategy objectives for the entire BNP Paribas Group. The Bank’s ambition is to replace all diesel and petrol cars with alternative drive cars by the end of 2025.

Transition resources

The Bank maximises its positive impact on environmental issues mainly by supporting the transformation of its Customers and offering them the right products, services and tools. At the same time, it limits the negative impact of its own activities. The Bank has dedicated teams that oversee the integration of climate issues in all its activities, both commercial and own operations.

The Bank has a Sustainability Department, which emphasises the Bank’s strategic approach to ESG aspects. Its functioning is described in detail in the General Disclosures (ESRS 2) – [Governance](#) section. The Real Estate Office and the Administration Office are responsible for implementing the objectives related to their own activities.

In 2022 the Bank launched the ESG Academy: an educational programme intended to train its employees on sustainability. It also addresses issues related to environmental transformation (including energy) and reinforces employees’ knowledge in this area. The third edition of the Academy took place in 2024 and its graduates form the Sustainability Community at the Bank. 384 employees have graduated from the programme since its inception, and in the third edition, which ended in October 2024: more than 200 people took part. We also organise ESG Days for people working in the Bank and the Group subsidiaries. This is a series of educational events dedicated to ESG issues - environmental, social and responsible management. The Sustainability Community and all interested employees have the opportunity to participate in the ‘Climate Mosaic’ and ‘Bio Mosaic’ workshops. In 2024, 153 people took advantage of this opportunity.

The ability to carry out the activities described in the section does not depend on the availability and allocation of resources. At the same time, through our activities of providing financing for, for example, innovations and solutions leading to the decarbonisation of our Customers, we influence the decarbonisation of our credit portfolio.



The Bank's capital expenditure in 2024 for the implementation of climate change mitigation and adaptation measures amounted to PLN 1,473,000 and included, among other things, the installation of photovoltaic equipment. The Group's total capital expenditure in 2024 amounted to PLN 442,757,000. Operating expenses for these activities amounted to PLN 34,988,000 and included, among other things, the purchase of green energy or the rental of hybrid and electric cars. Total costs amounted to PLN 3,351,809,000. Details are described in the section [General administrative expenses and depreciation and amortization](#).

Metrics and targets

Targets related to climate change mitigation and adaptation (E1-4)

Group targets and metrics related to climate change opportunities

Targets and metrics related to the Group's business activities

The Bank focuses on financing activities that promote the decarbonisation of the economy, supporting these ambitions by setting sales targets for financing transactions and projects aimed at using energy from renewable sources and actively investing in sustainable technologies. In 2024, the value of sustainable financing provided by the Bank amounted to PLN 10.2 billion, including PLN 6.4 billion of financing for environmental purposes (so-called 'green' financing). The strategic goal is 10% sustainable financing and is described in detail in the [Pillar POSITIVE](#) presentation in the GObeyond Strategy Implementation section. The Bank has not defined targets for its credit portfolios and financed greenhouse gas emissions (Scope 3, Category 15. Investments).

Targets and metrics related to the Group's own operations

Approach and metrics

The data required to calculate the metrics related to own operations are collected annually by all Group companies. The period considered for data collection covers the 12 months from January to December 2024.

The measurement of CO₂ emissions from the Group's activities is based on the GHG Protocol reference methodology. The energy consumed (electricity, gas, oil, district heating) in the buildings occupied by the Group and the energy consumed in the means of transport used by employees for business travel (excluding travel from home to work) by car, train or plane are taken into account. Only the combustion of fossil fuels is considered; fuel extraction and transport are excluded from this calculation. Through its activities, the Group is not a material source of noise pollution or any other specific industrial pollution.

Sustainability measures are an integral part of GObeyond Bank's 2022-2025 strategy, which includes commitments to develop sustainable products, their sales volumes, as well as to reduce greenhouse gas emissions (in scope 1, 2 and 3 - business travel).

In Scopes 1 and 2 as well as Scope 3 (business travel), the Bank has set the goal of reducing greenhouse gas emissions by 55% by 2025 and reducing energy consumption by 35% in the GOBeyond strategy. The reduction of greenhouse gas emissions includes CO₂e. In 2024, both strategic goals defined in the GObeyond strategy were achieved.

Table 86. Achievement of GObeyond's strategic target to reduce CO₂ emissions (2022-2025)

Target 2025	Emission volume (tonnes CO ₂ e)		
	base year 2019	Target 2025	base year 2019
Reduction of CO ₂ emissions from operations - 55%	20,149	8,280	-59%

Table 87. Achieving GObeyond's strategic goal for energy consumption (2022-2025)

Target 2025	base year 2019 (in GJ)	Target 2025 (in GJ)	base year 2019
Reduction of energy consumption - 35%	153,389	70,651	-54%

The objectives relate to the Group's own operations.

The base year for target setting is 2019. It was chosen because it reflects the organisation's typical operating conditions. In the following years, the Group's own activities were disrupted by the COVID-19 pandemic, which had an impact on the results regarding greenhouse gas emissions or energy consumption. The targets include all companies in the Group.

Decarbonisation levers used to reduce greenhouse gas emissions in our own operations are described in the section on Actions and resources in relation to climate change policies (E1-3). The key decarbonisation lever affecting the reduction of greenhouse gas emissions in scope 1 is the use of an alternative drive fleet, while in scope 2 it is energy from renewable sources.

Climate scenarios were not taken into account in the development of the targets for own operations.

From the perspective of the Bank's operations, scope 3 emissions are most relevant, in particular those resulting from category 15 of the GHG Protocol. These include emissions from the loan portfolio, over which the Bank has no direct control.

Energy consumption and mix (E1-5)

The Group measures electricity consumption at its sites, as well as the amount of electricity produced by the photovoltaic installations installed at selected sites.



The Group's energy consumption and energy mix can be broken down as follows:

Table 88. Information on energy consumption and energy mix in the Group

Energy consumption and energy mix	2024
1) Fuel consumption from coal and coal products (MWh)	0
2) Fuel consumption from crude oil and petroleum products (MWh)	15,535
3) Fuel consumption from natural gas (MWh)	3,563
4) Fuel consumption from other fossil sources (MWh)	0
5) Consumption of purchased or procured electricity, heat, steam and cooling from fossil sources (MWh)	8,397
6) Total consumption of energy from fossil sources (MWh) (calculated as the sum of lines 1-5)	27,495
Share of fossil sources in total energy consumption (%)	71%
7) Energy consumption from nuclear sources (MWh)	0
Share of energy consumption from nuclear sources in total energy consumption (%)	0
8) Fuel consumption of renewable sources, including biomass (also including industrial and municipal bio-waste, biogas, renewable hydrogen, etc.) (MWh)	0
9) Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources (MWh)	11,228
10) Consumption of self-generated renewable energy without fuel (MWh)	214
11) Total renewable and low-carbon energy consumption (MWh) (calculated as the sum of lines 8-10)	11,442
Share of renewables in total energy consumption (%)	29%
Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)	38,937

Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)

Greenhouse gas emissions from scope 1 and 2 and 3 of own activities

In 2024, the Group's total emissions from business activities [direct emissions (scope 1), indirect emissions related to energy purchases (scope 2) and indirect emissions related to business travel (scope 3)] amounted to 8,280 tCO₂e (on a market-based approach).

Direct emissions from fossil fuel combustion in scope 1 amounted to 4,723 tCO₂, while in scope 2 we recorded 2,991 tCO₂e of indirect emissions from energy consumption on a market-based approach. In scope 3, business travel emissions amount to 567 tCO₂e.

The methodology for calculating the carbon footprint in the Group is in accordance with the GHG Protocol. Scope 1 of the carbon footprint includes direct emissions, i.e. emissions from the combustion of fuels in energy sources, production processes and means of transport that belong to the organisation and are under its control, but also emissions from the leakage of refrigerants, e.g. from air conditioning systems. The Scope 2 carbon footprint, on the other hand, includes indirect energy emissions that are related to the electricity and heat purchased by the organisation. These are emissions that occur outside the organisation at sources owned or controlled by other entities. The carbon footprint from the use of

utilities has been calculated for each of the Group's 379 locations. The estimation includes the use of electricity, gas and central heating. In 2024, the data collection will use the carbon footprint calculation tool within the Envirly platform. It is based on the GHG Protocol and ISO 14064-1 and has been certified by the auditing company TUV NORD. The emission factors needed to calculate greenhouse gas emissions come from the publications from the National Centre for Emissions Management (KOBiZE), the Energy Regulatory Office (URE) and the DEFRA (Department for Environment, Food and Rural Affairs in the UK Government) database, among others. Greenhouse gas emissions related to business trips are calculated based on the kilometres travelled and are related to:

- bookings for air and train travel made through travel agencies with which the Group cooperates,
- travel by private car.

The Group uses contractual instruments such as guarantees of origin for renewable energy issued by Respect Energy. These cover 100% of the energy purchased, so all greenhouse gas emissions generated under Scope 2 calculated according to the market-based method are covered.

The Group does not buy energy for which the guarantees of origin indicate biomass. It has also no possibility of identifying greenhouse gas emissions from the combustion or biodegradation of biomass in value chain.

Scope 3 emissions

As of 31 December 2024, the estimated financed GHG emissions (category 15) are 4,701,774t CO₂e.

The calculations are made in accordance with the GHG Protocol and PCAF standard, which takes into account emissions from direct corporate financing in the form of equity, debt and project finance. The calculation includes exposures of the banking portfolio to non-financial corporates. The gross carrying amount of the Group's exposures that form the basis of the GHG calculations is PLN 49.6 billion. The calculations include:

- loans to large enterprises,
- loans to small and medium-sized enterprises,
- loans to micro-enterprises,
- corporate bonds and shares in third parties.

To determine the share of greenhouse gas emissions attributable to the Group, scope 1 and 2 Customer emissions data is used, which is publicly available, obtained from external suppliers and directly from Customers. Where Customer data is not available, the Group calculates using average emission factors determined for regions and sectors according to the PCAF standard. The Group does not present Scope 3 Customer GHG emissions due to the lack of a standardised framework for reporting certain emissions, leading to a lack of precise, consistent and comparable data. While the Group has made efforts to obtain data, most Clients have not provided data regarding Scope 3, or the data provided indicates poor quality. Many Customers do not yet have the capacity or systems in place to track total emissions, which can lead to the disclosure of fragmented data. The Group believes that presenting incomplete data may mislead report recipients. Since the quality of



data depends on external factors, it is not possible to indicate a time horizon in which the Group will be able to include Scope 3 data of satisfactory quality in its calculations.

As of 31 December 2024, approximately 20% in the portfolio of financed non-financial corporate emissions are reported by Clients. Accordingly, the calculation of 80% of issues is based on sector and geographic averages. Nonetheless, the Group is taking steps to increase the share of data obtained directly from customers through, for example, its collaboration with Envirly.

The following balance sheet exposures were not included in the measurement of greenhouse gas emissions (gross carrying value according to the approach used in the emissions calculation):

- securities (other than corporate bonds), including cash, treasury and development banks (with a total value of PLN 55,4 billion) - this exclusion is due to the fact that this portfolio is not of a commercial nature - its purpose is to ensure the safe management of the Group's liquidity, in particular to enable the banks to maintain the minimum ratio of liquid assets to net outflows (meeting regulatory obligations) and to manage interest rate risk; in addition, the available data used to calculate greenhouse gas emissions from sovereign debt is based on averaged data for the entire economy; the average emission intensity of this portfolio according to the PCAF standard is 57 tCO₂e/million PLN;
- mortgages (PLN 22 billion) and car loans (PLN 3.2 billion) - the data collected on building energy certificates is currently insufficient, so calculations are mainly based on proxies and averages; in the case of GHG emissions for car loans, the range of data collected is not sufficient to make accurate calculations, at the same time, car loans relate to part of the value chain which may result in multiple emission counts; the exclusion of financed emissions of mortgages and car loans has an intangible impact on total financed emissions.

Off-balance sheet items are not included in the calculation. Other categories are not calculated by the Group due to their non-materiality.

Table 89. Methodology for calculating Scope 3 greenhouse gas emissions in the Group

Source of Scope 3 emissions	Methodology for calculating Scope 3 emissions
6 Business trips	The emission factors needed to calculate emissions are derived from the DEFRA standard.
15 Investments	The reporting of so-called financed greenhouse gas emissions resulting from the Group's lending and debt capital investments follows the PCAF Funding Emission Part A methodology (Partnership for Carbon Accounting Financials)

The Group is not aware of any material events or circumstances related to differences between the reporting period of the Group and the reporting period of Customers.

Summary of gross Scope 1, 2, 3 and total greenhouse gas emissions

The Group's greenhouse gas (GHG) emissions are distributed as shown in the table below. Category 15 Scope 3 emissions account for nearly 100% of total emissions.

Table 90. Total gross Scope 1, 2 and 3 greenhouse gas emissions in the Group in tCO₂e

	2024
Scope 1 greenhouse gas emissions	
Gross Scope 1 greenhouse gas emissions (tonnes of carbon dioxide equivalent)	4,723
Percentage of Scope 1 greenhouse gas emissions from regulated emissions trading schemes (%)	-
Scope 2 greenhouse gas emissions	
Gross Scope 2 greenhouse gas emissions by location-based approach (tonnes of carbon dioxide equivalent)	10,986
Gross Scope 2 greenhouse gas emissions under the market-based approach (tonnes of carbon dioxide equivalent)	2,991
Significant Scope 3 greenhouse gas emissions	
Total gross indirect Scope 3 greenhouse gas emissions (tonnes of carbon dioxide equivalent)	4,702,341*
1 Purchased Goods and Services	-
2 Capital Goods	-
3 Fuel- and Energy-Related Activities (Not Included in Scope 1 or Scope 2)	-
4 Upstream Transportation and Distribution	-
5 Waste Generated in Operations	-
6 Business Travel	567
7 Employee Commuting	-
8 Upstream Leased Assets	-
9 Downstream Transportation and Distribution	-
10 Processing of Sold Products	-
11 Use of Sold Products	-



	2024
12 End-of-Life Treatment of Sold Products	-
13 Downstream Leased Assets	-
14 Franchises	-
15 Investments	4,701,774*
Total greenhouse gas emissions	
Total greenhouse gas emissions (location-based method) (tonnes of carbon dioxide equivalent)	4,718,049*
Total greenhouse gas emissions (market-based method) (tonnes of carbon dioxide equivalent)	4,710,054*

*As more thoroughly described above, the value does not take into account sovereign bond issues and Scope 3 customers.

The Group is not aware of any significant events or changes in circumstances between the Group's reporting period and the reporting period of its Customers.

GHG intensity

In the absence of standards for the application of a GHG intensity per revenue metric for financial institutions, the Group publishes the GHG intensity (financed emissions) per unit of financed assets, of 95 tCO₂e/PLN mln. On the other hand, the GHG intensity ratio calculated in accordance with the requirements of ESRS E1-6, relating total GHG emissions to net income published in the Group financial results section of this report, on both a location-based and market-based basis, is 0.37 tCO₂e/ thousand PLN. Net income of PLN 12,872,585 thousand represents the sum of the following items: interest income, fee and commission income, dividend income, result on trading activities (including result on exchange items), result on investment activities, result on hedge accounting and other operating income.

GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

The Group does not purchase carbon credits, but such projects are undertaken by the BNP Paribas Group.

Internal carbon pricing (E1-8)

The Group does not use internal carbon pricing systems.



Activities aligned with EU Taxonomy

Regulatory framework and reporting obligations for financial institutions

The European Taxonomy (Taxonomy) is a system for classifying economic activities according to their contribution to the six environmental objectives defined by the European Commission in the various Regulations and Delegated Acts published between June 2020 and November 2023.

The Taxonomy is based on two central concepts:

- the eligibility of an activity, if the latter is described in one of the Delegated Regulations of the Taxonomy because of its high potential to contribute to any one of the six environmental objectives;
- the alignment, which confirms the significant contribution of an eligible activity to one of the six environmental objectives, based on measurable criteria. An aligned activity is defined as an activity that makes a substantial contribution to one of the environmental objectives without causing harm to the other objectives, i.e. that firstly satisfies all the technical screening criteria described in one of the delegated regulations, and secondly that meets the minimum safeguards.

In 2024, European financial institutions will be required to publish extended reports. These requirements include disclosing the alignment of activities with all six environmental objectives, not just the two climate objectives, as it was in the previous years.

The main alignment indicator is the Green Asset Ratio (GAR), which concerns financing instruments (loans and advances, debt securities, equity instruments) on the institution's balance sheet. This disclosure of the GAR is accompanied by the green ratio of financial guarantees and the green ratio of assets under management.

Scope of financial assets subject to the eligibility analysis

Taxonomy disclosures are prepared on a consolidated basis in accordance with prudential consolidation.

Green asset ratio (GAR)

The measurement of financial assets covered by the Taxonomy regulation is based on the gross carrying amount.

The ratio numerator measures the amounts of financial assets corresponding to aligned activities within the meaning of the Taxonomy. Its scope of analysis covers the following financial assets (in the form of loans and advances, debt securities and equity instruments):

- outstandings on European financial and non-financial companies subject to the NFRD (Non-Financial Reporting Directive) in 2024⁸;

- outstandings on households in the three loan categories covered by the regulation (mortgage loans, building renovation loans, motor vehicle loans granted from 1 January 2022);
- outstandings on local administration for financing of public housing and other specialised financing (only for which the allocation of funds is known).

The ratio denominator includes the following asset categories (in addition to the financial assets subject to alignment analysis for the calculation of the numerator):

- interbank deposits on demand interbank loans;
- receivables from derivative hedging instruments;
- receivables from EU companies not subject by the NFRD and receivables from non-EU counterparties;
- exposures to households that do not correspond to the three categories of loans covered by the GAR (which are mortgage loans, building renovation loans, motor vehicle loans);
- cash and cash-related assets;
- other assets (e.g. tangible fixed assets and intangible assets, deferred tax assets).

The inclusion of assets excluded from numerator alignment analysis in the asset denominator (41.5% of balance sheet assets, in gross carrying amount) causes a structural imbalance of the indicator. Therefore, this ratio should not be a representative measurement indicator for alignment.

Exposures to central governments, central banks and supranational issuers as well as the trading book are not covered by the regulation, and amount to 34.1% of balance sheet assets, in gross carrying amount.

The GAR, which is measured on a stock basis, is completed by a flow-based metric. This metric indicates the proportion of the change in the assets aligned with the Taxonomy in the reporting period to the total change in the assets included in the denominator.

Ratios of green off-balance sheet asset

Concerning the green ratio of financial guarantees, the scope of analysis for aligning guarantees, used to calculate the ratio numerator, covers financial guarantees whose counterparties are European companies subject in 2024 to the NFRD. The denominator includes all financial guarantees granted to companies regardless of whether they are covered by the regulation.

Concerning the green ratio of assets under management, the scope of alignment covers instruments invested in European companies subject in 2024 to the NFRD. This covers the assets of the portfolio management service of the Brokerage Office

⁸ NFRD, Non-Financial Reporting Directive 2014/95/UE from 22.10.2014



of the Bank and investment funds managed by BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A. – a subsidiary of the Bank.

Exposures to central governments, central banks or supranational issuers are excluded from the off-balance sheet indicators.

Methodology for assessing compliance with the EU Taxonomy

The analysis of the eligibility and alignment of financial assets with the Taxonomy is based on differentiated approaches according to the categories of counterparties: companies subject in 2024 to the NFRD, local governments, European households and investment funds.

For counterparties subject to the NFRD, if the financing instruments are with unknown use of proceeds, the Group collects, via data providers, the share of alignment published by the counterparties, such as the aligned turnover ratio and the aligned capital expenditure ratio (CapEx). This treatment applies to the three ratios: the Green Asset Ratio – GAR, the green ratio for financial guarantees and the green ratio for assets under management.

In case the use of funds is known the alignment measure should be based on information collected from the counterparty. The communication notice published by European Commission on 8 November 2024 on the interpretation of certain provisions of Delegated Regulation (EU) 2021/2178 specifies that as such banking institutions must collect supporting documents proving the alignment for each of the technical criteria, in order to ensure that they are met. The level of collection and verification of the requirements set by the Commission's communication of 8 November 2024 is not fully achievable. This is why no financial instrument whose use of funds is known has been reported in the GAR numerator, whether with respect to companies or local governments.

With regard to households, a similar approach should be conducted to assess the alignment of mortgage loans, building renovation loans and motor vehicle loans, with the collection of evidence justifying each of the criteria for both key energy or low-carbon performance criteria, as well as for other criteria justifying the absence of negative impacts on the other five environmental objectives. The Group is able to carry out this full assessment approach only for mortgage loans, by leveraging on its internal assessment framework of climate physical risks. As a precautionary measure, the Bank considered only those exposures located in areas not exposed to physical risk and with low exposure to physical risk as aligned with the Taxonomy.

For renovation loans and car loans, the Group indeed collects evidence from households for key energy or low-carbon performance criteria, but is not able to assess the absence of negative impacts on the other five environmental objectives. Therefore, the GAR numerator only includes, with regard to households loans, mortgage loans.

With regard to the investment funds covered by the green ratio of assets under management, and in particular those included in the portfolios under management mandate, the Group has been able to integrate the first alignment shares published by investment funds subject to EU Sustainable Finance Disclosure Regulation (SFDR) 2019/2088.



Values of alignment indicators as at 31 December 2024

Based on the methodological assumptions outlined above, the table below shows the main alignment ratios with the Taxonomy as stipulated by regulations. The Group's green asset ratio, measured from counterparty revenue indicators, was 0.5%, and measured from counterparty CapEx indicators was 0.8%.

The main differences affecting the green asset ratio compared to the previous year include a decrease in Taxonomy alignment financing exposures for clients subject to the NFRD, despite an increase in total exposures, and the inclusion of mortgage loans to households as aligned.

Table 91. Summary of KPIs to be disclosed by credit institutions according to Article 8 of the Systemic Regulation

		Total environmentally sustainable assets (based on REVENUE KPI)	Total environmentally sustainable assets (based on CAPEX KPI)	KPI****	KPI*****	% 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	562,704	889,167	0.5%	0.8%	65.9%	41.5%	34.1%
Additional KPIs	GAR (flow)	50,240	106,768	0.3%	0.2%	51.0%	26.7%	49.0%
	<i>Trading book*</i>	n/a	n/a	n/a	n/a			
	<i>Financial guarantees</i>	90	1,049	0.6%	7.0%			
	<i>Assets under management</i>	112,646	65,852	1.4%	0.8%			
	<i>Fees and commissions income**</i>	n/a	n/a	n/a	n/a			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

** Fees and commissions income from services other than lending and AuM.

*** % of assets covered by the KPI over banks' total assets

**** based on the Turnover KPI of the counterparty

***** based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used



Table 92. Assets for the calculation of GAR - based on turnover KPIs

31.12.2024 PLN '000		a	b	c	d	e	f	g	h	i	j	k	l	m	n		
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
<u>GAR - Covered assets in both numerator and denominator</u>																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	41,379,872	26,442,934	559,279	139,392	3,242	406,705	5,363	3,425	0	1	385	0	0	0		
2	Financial undertakings	2,735,080	1,644,082	224,513	0	0	224,513	0	0	0	0	0	0	0	0		
3	Credit institutions	203,213	0	0	0	0	0	0	0	0	0	0	0	0	0		
4	Loans and advances	203,213	0	0	0	0	0	0	0	0	0	0	0	0	0		
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0		
7	Other financial corporations	2,531,867	1,644,082	224,513	0	0	224,513	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 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	65	0	0	0	0	0	0	0	0	0	0	0	0	0		
17	Loans and advances	65	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		



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	n		
PLN '000		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
								Of which Use of Proceeds	Of which transitional	Of which enabling					Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator																	
20	Non-financial undertakings	5,008,568	878,256	195,374	0	3,242	182,191	5,363	3,425	0	1	385	0	0	0		
21	Loans and advances	5,008,568	878,256	195,374	0	3,242	182,191	5,363	3,425	0	1	385	0	0	0		
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0		
24	Households	33,618,116	23,920,596	139,392	139,392	0	0	0	0	0	0						
25	of which loans collateralised by residential immovable property	19,563,814	19,491,458	139,392	139,392	0	0	0	0	0	0						
26	of which building renovation loans	877,667	877,667	0	0	0	0	0	0	0	0						
27	of which motor vehicle loans	4,192,436	3,551,471	0	0	0	0										
28	Local governments financing	18,108	0	0	0	0	0	0	0	0	0	0	0	0	0		
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
30	Other local government financing	18,108	0	0	0	0	0	0	0	0	0	0	0	0	0		
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	70,627,933															
33	Financial and Non-financial undertakings	56,613,270															
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	46,005,406															
35	Loans and advances	45,794,765															
36	of which loans collateralised by commercial immovable property	20,272,932															
37	of which building renovation loans	81,098															



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	n
PLN '000		Total [gross] carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling			
<u>GAR - Covered assets in both numerator and denominator</u>															
38	Debt securities	85,259													
39	Equity instruments	125,382													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	144,320													
41	Loans and advances	66,050													
42	Debt securities	0													
43	Equity instruments	78,270													
44	Derivatives	544,073													
45	On demand interbank loans	6,907,760													
46	Cash and cash-related assets	2,382,814													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	4,180,016													
48	Total GAR assets	112,007,806	26,442,934	559,279	139,392	3,242	406,705	5,363	3,425	0	1	385	0	0	0
49	<u>Assets not covered for GAR calculation</u>	57,995,288													
50	Central governments and Supranational issuers	41,927,479													
51	Central banks exposure	13,940,740													
52	Trading book	2,127,068													
53	Total assets	163,557,148	29,971,922	488,425	0	287,965	87,334	305,640	202,790	0	144,317	0	0	0	0
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations															
54	Financial guarantees	14,984	90	90	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	8,242,881	322,923	108,422	0	8,161	13,921	18,733	4,224	0	1,296	29	0	0	0
56	Of which debt securities	4,242,103	180,073	9,713	0	105	2,924	7,931	2,681	0	664	2	0	0	0



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	n
PLN '000		Total [gross] carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling			
<u>GAR - Covered assets in both numerator and denominator</u>															
57	Of which equity instruments	583,330	61,514	17,373	0	68	10,997	10,801	1,543	0	632	27	0	0	0

31.12.2024		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
PLN '000		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	
<u>GAR - Covered assets in both numerator and denominator</u>																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	9,191	0	0	0	89	0	0	0	4	0	0	0	26,457,966	562,704	139,392	3,242	406,705
2	Financial undertakings	5,442	0	0	0	0	0	0	0	0	0	0	0	1,649,524	224,513	0	0	224,513
3	Credit institutions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	5,442	0	0	0	0	0	0	0	0	0	0	0	1,649,524	224,513	0	0	224,513
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



31.12.2024		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which 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 environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
GAR - Covered assets in both numerator and denominator																		
11	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
20	Non-financial undertakings	3,749	0	0	0	89	0	0	0	4	0	0	0	887,847	198,799	0	3,242	182,192
21	Loans and advances	3,749	0	0	0	89	0	0	0	4	0	0	0	887,847	198,799	0	3,242	182,192
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
24	Households	0	0	0	0									23,920,596	139,392	139,392	0	0
25	of which loans collateralised by residential immovable property	0	0	0	0									19,491,458	139,392	139,392	0	0
26	of which building renovation loans	0	0	0	0									877,667	0	0	0	0
27	of which motor vehicle loans													3,551,471	0	0	0	0
28	Local governments financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



31.12.2024		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
PLN '000		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator																		
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)																	
33	Financial and Non-financial undertakings																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of which loans collateralised by commercial immovable property																	
37	of which building renovation loans																	
38	Debt securities																	
39	Equity instruments																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations																	
41	Loans and advances																	
42	Debt securities																	
43	Equity instruments																	
44	Derivatives																	
45	On demand interbank loans																	
46	Cash and cash-related assets																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)																	
48	Total GAR assets	9,191	0	0	0	89	0	0	0	4	0	0	0	26,457,966	562,704	139,392	3,242	406,705
49	Assets not covered for GAR calculation																	
50	Central governments and Supranational issuers																	



		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
31.12.2024		Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
PLN '000		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 environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)							
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling				
GAR - Covered assets in both numerator and denominator																		
51	Central banks exposure																	
52	Trading book																	
53	Total assets	9,191	0	0	0	89	0	0	0	4	0	0	0	26,457,966	562,704	139,392	3,242	406,705
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	45	0	0	0	0	0	0	0	0	0	0	0	135	90	0	0	0
55	Assets under management	6,897	0	0	0	46	0	0	0	134	0	0	0	348,762	112,646	0	8,161	15,217
56	Of which debt securities	3,374	0	0	0	0	0	0	0	5	0	0	0	191,386	12,394	0	105	3,588
57	Of which equity instruments	3,523	0	0	0	46	0	0	0	129	0	0	0	76,039	18,916	0	68	11,629



Table 93. Assets for the calculation of GAR - based on CapEx KPIs

31.12.2024 PLN '000		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		
<u>GAR - Covered assets in both numerator and denominator</u>															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	41,379,872	26,621,272	878,841	139,392	3,066	581,987	20,371	7,260	0	1	415	0	0	0
2	Financial undertakings	2,735,080	1,696,943	448,316	0	0	424,095	0	0	0	0	0	0	0	0
3	Credit institutions	203,213	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	203,213	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
7	Other financial corporations	2,531,867	1,696,943	448,316	0	0	424,095	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 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	65	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	65	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



31.12.2024 PLN '000		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		
<u>GAR - Covered assets in both numerator and denominator</u>															
20	Non-financial undertakings	5,008,568	1,003,734	291,133	0	3,066	157,892	20,371	7,260	0	1	415	0	0	0
21	Loans and advances	5,008,568	1,003,734	291,133	0	3,066	157,892	20,371	7,260	0	1	415	0	0	0
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
24	Households	33,618,116	23,920,596	139,392	139,392	0	0	0	0	0	0				
25	of which loans collateralised by residential immovable property	19,563,814	19,491,458	139,392	139,392	0	0	0	0	0	0				
26	of which building renovation loans	877,667	877,667	0	0	0	0	0	0	0	0				
27	of which motor vehicle loans	4,192,436	3,551,471	0	0	0	0								
28	Local governments financing	18,108	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	18,108	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	<u>Assets excluded from the numerator for GAR calculation (covered in the denominator)</u>	70,627,933													
33	Financial and Non-financial undertakings	56,613,270													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	46,005,406													
35	Loans and advances	45,794,765													
36	of which loans collateralised by commercial immovable property	20,272,932													
37	of which building renovation loans	81,098													
38	Debt securities	85,259													
39	Equity instruments	125,382													



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			Water and marine resources (WTR)				
Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)							
	Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
PLN '000															
<u>GAR - Covered assets in both numerator and denominator</u>															
40	Non-EU country counterparties not subject to NFRD disclosure obligations	144,320													
41	Loans and advances	66,050													
42	Debt securities	0													
43	Equity instruments	78,270													
44	Derivatives	544,073													
45	On demand interbank loans	6,907,760													
46	Cash and cash-related assets	2,382,814													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	4,180,016													
48	Total GAR assets	112,007,806	26,621,272	878,841	139,392	3,066	581,987	20,371	7,260	0	1	415	0	0	0
49	<u>Assets not covered for GAR calculation</u>	57,995,288													
50	Central governments and Supranational issuers	41,927,479													
51	Central banks exposure	13,940,740													
52	Trading book	2,127,068													
53	<u>Total assets</u>	170,003,093	26,621,272	878,841	139,392	3,066	581,987	20,371	7,260	0	1	415	0	0	0
<u>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</u>															
54	Financial guarantees	14,984	1,259	1,049	0	0	4	0	0	0	0	0	0	0	0
55	Assets under management	8,242,881	284,687	64,121	0	2,443	15,158	23,389	1,731	0	94	340	0	0	0
56	Of which debt securities	4,242,103	209,549	36,415	0	549	2,450	6,357	226	0	27	177	0	0	0
57	Of which equity instruments	583,330	75,138	27,706	0	1,894	12,708	17,033	1,505	0	66	164	0	0	0



31.12.2024 PLN '000 <u>GAR - Covered assets in both numerator and denominator</u>		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	4,190	0	0	0	339	0	0	0	399	3,066	0	0	26,646,985	889,167	139,392	3,066	581,988
2	Financial undertakings	0	0	0	0	0	0	0	0	0	0	0	0	1,696,943	448,316	0	0	424,095
3	Credit institutions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	1,696,943	448,316	0	0	424,095
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
20	Non-financial undertakings	4,190	0	0	0	339	0	0	0	399	3,066	0	0	1,029,447	301,459	0	3,066	157,894



31.12.2024 PLN '000		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
GAR - Covered assets in both numerator and denominator																		
21	Loans and advances	4,190	0	0	0	339	0	0	0	399	3,066	0	0	1,029,447	301,459	0	3,066	157,894
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0		0	0	0		0	0	0		0	0	0		0	0
24	Households	0	0	0	0								23,920,596	139,392	139,392	0	0	
25	of which loans collateralised by residential immovable property	0	0	0	0								19,491,458	139,392	139,392	0	0	
26	of which building renovation loans	0	0	0	0								877,667	0	0	0	0	
27	of which motor vehicle loans													3,551,471	0	0	0	0
28	Local governments financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)																	
33	Financial and Non-financial undertakings																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of which loans collateralised by commercial immovable property																	
37	of which building renovation loans																	
38	Debt securities																	
39	Equity instruments																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations																	



31.12.2024		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
PLN '000		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	
<u>GAR - Covered assets in both numerator and denominator</u>																		
41	Loans and advances																	
42	Debt securities																	
43	Equity instruments																	
44	Derivatives																	
45	On demand interbank loans																	
46	Cash and cash-related assets																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)																	
48	Total GAR assets	4,190	0	0	0	339	0	0	0	399	3,066	0	0	26,646,985	889,167	139,392	3,066	581,988
49	<u>Assets not covered for GAR calculation</u>																	
50	Central governments and Supranational issuers																	
51	Central banks exposure																	
52	Trading book																	
53	Total assets	4,190	0	0	0	339	0	0	0	399	3,066	0	0	26,646,985	889,167	139,392	3,066	581,988
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	0	0	0	0	0	0	0	0	0	0	0	0	1,259	1,049	0	0	4
55	Assets under management	7,468	0	0	0	73	0	0	0	0	0	0	0	315,957	65,852	0	2,443	15,252
56	Of which debt securities	2,974	0	0	0	1	0	0	0	0	0	0	0	219,058	36,640	0	549	2,477
57	Of which equity instruments	4,494	0	0	0	72	0	0	0	0	0	0	0	96,899	29,212	0	1,894	12,775



Table 94. GAR sector information - based on turnover KPIs

Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)	
1	02.40 - Service activity related to forestry	18	0			18	0			0	0				
2	16.23 - Manufacture of other builders' carpentry and joinery	22,428	9			0	0			0	0				
3	17.11 - Manufacture of pulp	1	0			0	0			0	0				
4	17.12 - Manufacture of paper and paperboard	22,179	0			0	0			0	0				
5	17.21 - Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	2	0			0	0			0	0				
6	20.11 - Manufacture of industrial gases	62,769	48			0	0			0	0				
7	20.13 - Manufacture of other inorganic basic chemicals	40,587	801			0	0			0	0				
8	20.15 - Manufacture of fertilisers and nitrogen compounds	1,593	0			0	0			0	0				
9	20.16 - Manufacture of plastics in primary forms	101,811	0			0	0			0	0				
10	21.10 - Manufacture of basic pharmaceutical substances	0	0			0	0			0	0				
11	22.21 - Manufacture of plastic plates, sheets, tubes and profiles	34,651	10,534			0	0			0	0				
12	22.22 - Manufacture of plastic packing goods	15	1			0	0			0	0				
13	22.23 - Manufacture of builders' ware of plastic	41	0			0	0			0	0				
14	22.29 - Manufacture of other plastic products	12	0			0	0			0	0				
15	23.13 - Manufacture of hollow glass	43,737	0			0	0			0	0				
16	23.99 - Manufacture of abrasive products and others non-metallic mineral products not elsewhere classified	35	20			0	0			0	0				
17	24.42 - Aluminium production	162,567	49,420			0	0			0	0				
18	25.11 - Manufacture of metal structures and parts of structures	846	0			0	0			0	0				
19	25.12 - Manufacture of metal elements of building woodwork	140,978	42,857			0	0			0	0				
20	25.61 - Treatment and coating of metals	1,364	0			0	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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	
PLN'000		Of which environmentally sustainable (CCM)	PLN'000	Of which environmentally sustainable (CCM)	PLN'000	Of which environmentally sustainable (CCA)	PLN'000	Of which environmentally sustainable (CCA)	PLN'000	Of which environmentally sustainable (WTR)	PLN'000	Of which environmentally sustainable (WTR)	
21	25.62 - Mechanical working of metal elements	4,879	0			0	0			0	0		
22	25.72 - Manufacture of locks and hinges	4	0			0	0			0	0		
23	25.94 - Manufacture of fasteners and screws	5,690	0			0	0			0	0		
24	26.11 - Manufacture of electronic components	5,026	0			0	0			0	0		
25	26.12 - Manufacture of electronic printed circuits	137,468	0			0	0			0	0		
26	27.12 - Manufacture of electricity distribution and control apparatus	2,063	500			0	0			0	0		
27	27.51 - Manufacture of electric domestic appliances	479	0			0	0			0	0		
28	28.14 - Manufacture of other taps and valves	26,911	0			0	0			0	0		
29	28.21 - Manufacture of ovens, furnaces and furnace burners	25,573	3			0	0			0	0		
30	28.23 - Manufacture of office machinery and equipment, except computers and peripheral equipment	17,413	134			0	0			0	0		
31	28.25 - Manufacture of industrial cooling and ventilation equipment	11	0			0	0			0	0		
32	28.92 - Manufacture of machinery for mining, quarrying and construction	141,077	35,438			0	0			0	0		
33	28.93 - Manufacture of machinery for food, beverage and tobacco processing	14	0			0	0			0	0		
34	28.99 - Manufacture of other special-purpose machinery not elsewhere classified	890	0			0	0			0	0		
35	29.20 - Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	135,235	748			0	0			0	0		
36	29.32 - Manufacture of other parts and accessories for motor vehicles excluding motorcycles	17,839	0			0	0			0	0		
37	30.12 - Building of pleasure and sporting boats	13,758	0			0	0			0	0		
38	30.20 - Manufacture of railway locomotives and rolling stock	182	0			0	0			0	0		
39	33.13 - Repair and maintenance of electronic and optical equipment	35	0			0	0			0	0		
40	33.20 - Installation of industrial machinery and equipment	2,108	24			0	0			0	0		
41	35.11 - Production of electricity	98,729	180			0	0			0	0		



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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	
PLN'000		Of which environmentally sustainable (CCM)	PLN'000	Of which environmentally sustainable (CCM)	PLN'000	Of which environmentally sustainable (CCA)	PLN'000	Of which environmentally sustainable (CCA)	PLN'000	Of which environmentally sustainable (WTR)	PLN'000	Of which environmentally sustainable (WTR)	
42	35.22 - Distribution of gaseous fuels through mains	205	0			0	0			0	0		
43	36.00 - Water collection, treatment and supply	146	0			146	0			146	0		
44	38.11 - Collection of non-hazardous waste	3	0			0	0			0	0		
45	41.10 - Realization of building projects related to erection of buildings	36,887	0			0	0			0	0		
46	41.20 - Building works related to erection of residential and non-residential buildings	61,210	2,264			0	0			0	0		
47	42.11 - Works related to construction of roads and motorways	30,459	1			0	0			0	0		
48	42.12 - Works related to construction of railways and underground railways	3,049	72			0	0			0	0		
49	42.22 - Works related to construction of telecommunications and electricity lines	15,341	665			0	0			0	0		
50	43.29 - Other construction installation	53	5			0	0			0	0		
51	46.11 - Agents involved in the sale of agricultural raw materials, live animals, textile raw materials and semi-finished goods	0	0			0	0			0	0		
52	46.13 - Agents involved in the sale of timber and building materials	0	0			0	0			0	0		
53	46.18 - Agents specialised in the sale of other particular products	0	0			0	0			0	0		
54	46.32 - Wholesale of meat and meat products	0	0			0	0			0	0		
55	46.34 - Wholesale of beverages	0	0			0	0			0	0		
56	46.36 - Wholesale of sugar and chocolate and sugar confectionery	0	0			0	0			0	0		
57	46.42 - Wholesale of clothing and footwear	0	0			0	0			0	0		
58	46.45 - Wholesale of perfume and cosmetics	0	0			0	0			0	0		
59	46.46 - Wholesale of pharmaceutical goods	0	0			0	0			0	0		
60	46.52 - Wholesale of electronic and telecommunications equipment and parts thereof	0	0			0	0			0	0		
61	46.69 - Wholesale of other machinery and equipment	0	0			0	0			0	0		
62	46.71 - Wholesale of fuels and related products	0	0			0	0			0	0		



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)		PLN'000		Of which environmentally sustainable (WTR)	
63	46.72 - Wholesale of metals and metal ores	0	0			0	0			0	0				
64	46.76 - Wholesale of other intermediate products	0	0			0	0			0	0				
65	46.77 - Wholesale of waste and scrap	0	0			0	0			0	0				
66	46.90 - Non-specialised wholesale trade	0	0			0	0			0	0				
67	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	0	0			0	0			0	0				
68	47.19 - Other retail sale in non-specialised stores	0	0			0	0			0	0				
69	47.51 - Retail sale of textiles in specialised stores	0	0			0	0			0	0				
70	47.72 - Retail sale of footwear and leather goods in specialised stores	0	0			0	0			0	0				
71	47.75 - Retail sale of cosmetic and toilet articles in specialised stores	0	0			0	0			0	0				
72	47.91 - Retail sale via mail order houses or via Internet	0	0			0	0			0	0				
73	47.99 - Other retail sale not in stores, stalls or markets	0	0			0	0			0	0				
74	49.10 - Passenger rail transport, interurban	1,331	0			0	0			0	0				
75	61.10 - Wired telecommunications activities	188,767	0			0	0			0	0				
76	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	461,017	0			0	0			0	0				
77	61.30 - Satellite telecommunications activities	77,373	0			0	0			0	0				
78	61.90 - Other telecommunications activities	2,767	0			0	0			0	0				
79	62.01 - Computer programming activities	12,127	0			12,127	0			12,127	0				
80	63.12 - Web portals	0	0			0	0			0	0				
81	65.12 - Other personal and property insurance	0	0			1	0			0	0				
82	68.20 - Rental and operating of own or leased real estate	15,486	0			0	0			0	0				
83	71.12 - Engineering activities and related technical consultancy	919	17			919	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)	
84	72.19 - Other research and experimental development on natural sciences and engineering	1,136	0			1,136	0			0	0				
85	77.11 - Rental and leasing of cars and light motor vehicles	1,139,265	93,252			0	0			0	0				
86	77.32 - Rental and leasing of construction machinery and equipment	0	0			0	0			0	0				
87	86.10 - Hospital activities	0	0			38,831	0			0	0				

Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)					
		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			
PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (PPC)		PLN'000		Of which environmentally sustainable (BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
1	02.40 - Service activity related to forestry	0	0			0	0			0	0			18	0				
2	16.23 - Manufacture of other builders' carpentry and joinery	0	0			0	0			0	0			22,428	9				
3	17.11 - Manufacture of pulp	0	0			0	0			0	0			1	0				
4	17.12 - Manufacture of paper and paperboard	0	0			0	0			0	0			22,179	0				
5	17.21 - Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0	0			0	0			0	0			2	0				
6	20.11 - Manufacture of industrial gases	0	0			0	0			0	0			62,769	48				
7	20.13 - Manufacture of other inorganic basic chemicals	0	0			0	0			0	0			40,587	801				
8	20.15 - Manufacture of fertilisers and nitrogen compounds	0	0			0	0			0	0			1,593	0				
9	20.16 - Manufacture of plastics in primary forms	0	0			0	0			0	0			101,811	0				



Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)			
		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	
PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
10	21.10 - Manufacture of basic pharmaceutical substances	0	0			48	0			0	0			48	0		
11	22.21 - Manufacture of plastic plates, sheets, tubes and profiles	0	0			0	0			0	0			34,651	10,534		
12	22.22 - Manufacture of plastic packing goods	15	0			0	0			0	0			15	1		
13	22.23 - Manufacture of builders' ware of plastic	0	0			0	0			0	0			41	0		
14	22.29 - Manufacture of other plastic products	0	0			0	0			0	0			12	0		
15	23.13 - Manufacture of hollow glass	0	0			0	0			0	0			43,737	0		
16	23.99 - Manufacture of abrasive products and others non-metallic mineral products not elsewhere classified	0	0			0	0			0	0			35	20		
17	24.42 - Aluminium production	0	0			0	0			0	0			162,567	49,420		
18	25.11 - Manufacture of metal structures and parts of structures	0	0			0	0			0	0			846	0		
19	25.12 - Manufacture of metal elements of building woodwork	0	0			0	0			0	0			140,978	42,857		
20	25.61 - Treatment and coating of metals	0	0			0	0			0	0			1,364	0		
21	25.62 - Mechanical working of metal elements	0	0			0	0			0	0			4,879	0		
22	25.72 - Manufacture of locks and hinges	0	0			0	0			0	0			4	0		
23	25.94 - Manufacture of fasteners and screws	0	0			0	0			0	0			5,690	0		
24	26.11 - Manufacture of electronic components	5,026	0			0	0			0	0			5,026	0		
25	26.12 - Manufacture of electronic printed circuits	137,468	0			0	0			0	0			137,468	0		
26	27.12 - Manufacture of electricity distribution and control apparatus	2,063	0			0	0			0	0			2,063	500		
27	27.51 - Manufacture of electric domestic appliances	479	0			0	0			0	0			479	0		
28	28.14 - Manufacture of other taps and valves	0	0			0	0			0	0			26,911	0		
29	28.21 - Manufacture of ovens, furnaces and furnace burners	0	0			0	0			0	0			25,573	3		
30	28.23 - Manufacture of office machinery and equipment, except computers and peripheral equipment	0	0			0	0			0	0			17,413	134		



Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)			
		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	
PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
31	28.25 - Manufacture of industrial cooling and ventilation equipment	0	0			0	0			0	0			11	0		
32	28.92 - Manufacture of machinery for mining, quarrying and construction	0	0			0	0			0	0			141,077	35,438		
33	28.93 - Manufacture of machinery for food, beverage and tobacco processing	0	0			0	0			0	0			14	0		
34	28.99 - Manufacture of other special-purpose machinery not elsewhere classified	0	0			0	0			0	0			890	0		
35	29.20 - Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	0	0			0	0			0	0			135,235	748		
36	29.32 - Manufacture of other parts and accessories for motor vehicles excluding motorcycles	0	0			0	0			0	0			17,839	0		
37	30.12 - Building of pleasure and sporting boats	0	0			0	0			0	0			13,758	0		
38	30.20 - Manufacture of railway locomotives and rolling stock	0	0			0	0			0	0			182	0		
39	33.13 - Repair and maintenance of electronic and optical equipment	0	0			0	0			0	0			35	0		
40	33.20 - Installation of industrial machinery and equipment	0	0			2,108	0			0	0			2,108	24		
41	35.11 - Production of electricity	0	0			0	0			0	0			98,729	180		
42	35.22 - Distribution of gaseous fuels through mains	0	0			0	0			0	0			205	0		
43	36.00 - Water collection, treatment and supply	0	0			0	0			0	0			146	0		
44	38.11 - Collection of non-hazardous waste	3	0			0	0			0	0			3	0		
45	41.10 - Realization of building projects related to erection of buildings	36,887	0			0	0			0	0			36,887	0		
46	41.20 - Building works related to erection of residential and non-residential buildings	61,210	0			0	0			0	0			61,210	2,264		
47	42.11 - Works related to construction of roads and motorways	30,459	0			0	0			0	0			30,459	1		
48	42.12 - Works related to construction of railways and underground railways	3,049	0			0	0			0	0			3,049	72		
49	42.22 - Works related to construction of telecommunications and electricity lines	15,341	0			0	0			0	0			15,341	665		
50	43.29 - Other construction installation	53	0			0	0			0	0			53	5		
51	46.11 - Agents involved in the sale of agricultural raw materials, live animals, textile raw materials and semi-finished goods	10	0			0	0			0	0			10	0		



Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)			
		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	
PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
52	46.13 - Agents involved in the sale of timber and building materials	307	0			0	0			0	0			307	0		
53	46.18 - Agents specialised in the sale of other particular products	1,461	0			0	0			0	0			1,461	0		
54	46.32 - Wholesale of meat and meat products	154,571	0			0	0			0	0			154,571	0		
55	46.34 - Wholesale of beverages	35,260	0			0	0			0	0			35,260	0		
56	46.36 - Wholesale of sugar and chocolate and sugar confectionery	27,832	0			0	0			0	0			27,832	0		
57	46.42 - Wholesale of clothing and footwear	117,411	0			0	0			0	0			117,411	0		
58	46.45 - Wholesale of perfume and cosmetics	2	0			0	0			0	0			2	0		
59	46.46 - Wholesale of pharmaceutical goods	264	0			0	0			0	0			264	0		
60	46.52 - Wholesale of electronic and telecommunications equipment and parts thereof	13,918	0			0	0			0	0			13,918	0		
61	46.69 - Wholesale of other machinery and equipment	265,796	0			0	0			0	0			265,796	0		
62	46.71 - Wholesale of fuels and related products	3	0			0	0			0	0			3	0		
63	46.72 - Wholesale of metals and metal ores	50,957	0			0	0			0	0			50,957	0		
64	46.76 - Wholesale of other intermediate products	19	0			0	0			0	0			19	0		
65	46.77 - Wholesale of waste and scrap	2,748	0			0	0			0	0			2,748	0		
66	46.90 - Non-specialised wholesale trade	2,499	0			0	0			0	0			2,499	0		
67	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	141,202	0			0	0			0	0			141,202	0		
68	47.19 - Other retail sale in non-specialised stores	6	0			0	0			0	0			6	0		
69	47.51 - Retail sale of textiles in specialised stores	326	0			0	0			0	0			326	0		
70	47.72 - Retail sale of footwear and leather goods in specialised stores	38,019	0			0	0			0	0			38,019	0		
71	47.75 - Retail sale of cosmetic and toilet articles in specialised stores	89	0			0	0			0	0			89	0		
72	47.91 - Retail sale via mail order houses or via Internet	48,202	0			0	0			0	0			48,202	0		



Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)			
		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	
PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
73	47.99 - Other retail sale not in stores, stalls or markets	28	0			0	0			0	0			28	0		
74	49.10 - Passenger rail transport, interurban	0	0			0	0			0	0			1,331	0		
75	61.10 - Wired telecommunications activities	188,767	0			0	0			0	0			188,767	0		
76	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	461,017	0			0	0			0	0			461,017	0		
77	61.30 - Satellite telecommunications activities	77,373	0			0	0			0	0			77,373	0		
78	61.90 - Other telecommunications activities	2,767	0			0	0			0	0			2,767	0		
79	62.01 - Computer programming activities	12,127	0			0	0			0	0			12,127	0		
80	63.12 - Web portals	78,304	0			0	0			0	0			78,304	0		
81	65.12 - Other personal and property insurance	0	0			0	0			0	0			1	0		
82	68.20 - Rental and operating of own or leased real estate	0	0			0	0			0	0			15,486	0		
83	71.12 - Engineering activities and related technical consultancy	0	0			919	0			0	0			919	17		
84	72.19 - Other research and experimental development on natural sciences and engineering	0	0			0	0			0	0			1,136	0		
85	77.11 - Rental and leasing of cars and light motor vehicles	1,139,265	0			0	0			0	0			1,139,265	93,252		
86	77.32 - Rental and leasing of construction machinery and equipment	57,200	0			0	0			0	0			57,200	0		
87	86.10 - Hospital activities	0	0			0	0			0	0			38,831	0		



Table 95. GAR sector information - based on turnover KPIs - based on CapEx KPIs

Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)	
1	02.40 - Service activity related to forestry	18	0			18	0			0	0				
2	16.23 - Manufacture of other builders' carpentry and joinery	22,428	0			0	0			0	0				
3	17.11 - Manufacture of pulp	1	0			0	0			0	0				
4	17.12 - Manufacture of paper and paperboard	22,179	0			0	0			0	0				
5	17.21 - Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	2	0			0	0			0	0				
6	20.11 - Manufacture of industrial gases	62,769	506			0	0			0	0				
7	20.13 - Manufacture of other inorganic basic chemicals	40,587	6,673			0	0			0	0				
8	20.15 - Manufacture of fertilisers and nitrogen compounds	1,593	0			0	0			0	0				
9	20.16 - Manufacture of plastics in primary forms	101,811	0			0	0			0	0				
10	21.10 - Manufacture of basic pharmaceutical substances	0	0			0	0			0	0				
11	22.21 - Manufacture of plastic plates, sheets, tubes and profiles	34,651	6,341			0	0			0	0				
12	22.22 - Manufacture of plastic packing goods	15	2			0	0			0	0				
13	22.23 - Manufacture of builders' ware of plastic	41	0			0	0			0	0				
14	22.29 - Manufacture of other plastic products	12	0			0	0			0	0				
15	23.13 - Manufacture of hollow glass	43,737	0			0	0			0	0				
16	23.99 - Manufacture of abrasive products and others non-metallic mineral products not elsewhere classified	35	25			0	0			0	0				
17	24.42 - Aluminium production	162,567	29,750			0	0			0	0				
18	25.11 - Manufacture of metal structures and parts of structures	846	0			0	0			0	0				
19	25.12 - Manufacture of metal elements of building woodwork	140,978	25,799			0	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)	
20	25.61 - Treatment and coating of metals	1,364	0			0	0			0	0				
21	25.62 - Mechanical working of metal elements	4,879	0			0	0			0	0				
22	25.72 - Manufacture of locks and hinges	4	0			0	0			0	0				
23	25.94 - Manufacture of fasteners and screws	5,690	0			0	0			0	0				
24	26.11 - Manufacture of electronic components	5,026	0			0	0			0	0				
25	26.12 - Manufacture of electronic printed circuits	137,468	0			0	0			0	0				
26	27.12 - Manufacture of electricity distribution and control apparatus	2,063	423			0	0			0	0				
27	27.51 - Manufacture of electric domestic appliances	479	0			0	0			0	0				
28	28.14 - Manufacture of other taps and valves	26,911	0			0	0			0	0				
29	28.21 - Manufacture of ovens, furnaces and furnace burners	25,573	279			0	0			0	0				
30	28.23 - Manufacture of office machinery and equipment, except computers and peripheral equipment	17,413	20			0	0			0	0				
31	28.25 - Manufacture of industrial cooling and ventilation equipment	11	0			0	0			0	0				
32	28.92 - Manufacture of machinery for mining, quarrying and construction	141,077	85,330			0	0			0	0				
33	28.93 - Manufacture of machinery for food, beverage and tobacco processing	14	0			0	0			0	0				
34	28.99 - Manufacture of other special-purpose machinery not elsewhere classified	890	0			0	0			0	0				
35	29.20 - Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	135,235	8,732			0	0			0	0				
36	29.32 - Manufacture of other parts and accessories for motor vehicles excluding motorcycles	17,839	1			0	0			0	0				
37	30.12 - Building of pleasure and sporting boats	13,758	0			0	0			0	0				
38	30.20 - Manufacture of railway locomotives and rolling stock	182	0			0	0			0	0				
39	33.13 - Repair and maintenance of electronic and optical equipment	35	0			0	0			0	0				
40	33.20 - Installation of industrial machinery and equipment	2,108	24			0	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)	
41	35.11 - Production of electricity	98,729	1,668			0	0			0	0				
42	35.22 - Distribution of gaseous fuels through mains	205	0			0	0			0	0				
43	36.00 - Water collection, treatment and supply	146	0			146	0			146	0				
44	38.11 - Collection of non-hazardous waste	3	0			0	0			0	0				
45	41.10 - Realization of building projects related to erection of buildings	36,887	0			0	0			0	0				
46	41.20 - Building works related to erection of residential and non-residential buildings	61,210	806			0	0			0	0				
47	42.11 - Works related to construction of roads and motorways	30,459	0			0	0			0	0				
48	42.12 - Works related to construction of railways and underground railways	3,049	24			0	0			0	0				
49	42.22 - Works related to construction of telecommunications and electricity lines	15,341	648			0	0			0	0				
50	43.29 - Other construction installation	53	0			0	0			0	0				
51	46.11 - Agents involved in the sale of agricultural raw materials, live animals, textile raw materials and semi-finished goods	0	0			0	0			0	0				
52	46.13 - Agents involved in the sale of timber and building materials	0	0			0	0			0	0				
53	46.18 - Agents specialised in the sale of other particular products	0	0			0	0			0	0				
54	46.32 - Wholesale of meat and meat products	0	0			0	0			0	0				
55	46.34 - Wholesale of beverages	0	0			0	0			0	0				
56	46.36 - Wholesale of sugar and chocolate and sugar confectionery	0	0			0	0			0	0				
57	46.42 - Wholesale of clothing and footwear	0	0			0	0			0	0				
58	46.45 - Wholesale of perfume and cosmetics	0	0			0	0			0	0				
59	46.46 - Wholesale of pharmaceutical goods	0	0			0	0			0	0				
60	46.52 - Wholesale of electronic and telecommunications equipment and parts thereof	0	0			0	0			0	0				
61	46.69 - Wholesale of other machinery and equipment	0	0			0	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)	
62	46.71 - Wholesale of fuels and related products	0	0			0	0			0	0				
63	46.72 - Wholesale of metals and metal ores	0	0			0	0			0	0				
64	46.76 - Wholesale of other intermediate products	0	0			0	0			0	0				
65	46.77 - Wholesale of waste and scrap	0	0			0	0			0	0				
66	46.90 - Non-specialised wholesale trade	0	0			0	0			0	0				
67	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	0	0			0	0			0	0				
68	47.19 - Other retail sale in non-specialised stores	0	0			0	0			0	0				
69	47.51 - Retail sale of textiles in specialised stores	0	0			0	0			0	0				
70	47.72 - Retail sale of footwear and leather goods in specialised stores	0	0			0	0			0	0				
71	47.75 - Retail sale of cosmetic and toilet articles in specialised stores	0	0			0	0			0	0				
72	47.91 - Retail sale via mail order houses or via Internet	0	0			0	0			0	0				
73	47.99 - Other retail sale not in stores, stalls or markets	0	0			0	0			0	0				
74	49.10 - Passenger rail transport, interurban	1,331	0			0	0			0	0				
75	61.10 - Wired telecommunications activities	188,767	0			0	0			0	0				
76	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	461,017	0			0	0			0	0				
77	61.30 - Satellite telecommunications activities	77,373	0			0	0			0	0				
78	61.90 - Other telecommunications activities	2,767	0			0	0			0	0				
79	62.01 - Computer programming activities	12,127	0			12,127	0			12,127	0				
80	63.12 - Web portals	0	0			0	0			0	0				
81	65.12 - Other personal and property insurance	0	0			1	0			0	0				
82	68.20 - Rental and operating of own or leased real estate	15,486	0			0	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (WTR)	
83	71.12 - Engineering activities and related technical consultancy	919	154			919	2			0	0				
84	72.19 - Other research and experimental development on natural sciences and engineering	1,136	0			1,136	0			0	0				
85	77.11 - Rental and leasing of cars and light motor vehicles	1,139,265	223,296			0	0			0	0				
86	77.32 - Rental and leasing of construction machinery and equipment	0	0			0	0			0	0				
87	86.10 - Hospital activities	0	0			38,831	0			0	0				

Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)					
		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			
PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (PPC)		PLN'000		Of which environmentally sustainable (BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
1	02.40 - Service activity related to forestry	0	0			0	0			0	0			18	0				
2	16.23 - Manufacture of other builders' carpentry and joinery	0	0			0	0			0	0			22,428	0				
3	17.11 - Manufacture of pulp	0	0			0	0			0	0			1	0				
4	17.12 - Manufacture of paper and paperboard	0	0			0	0			0	0			22,179	0				
5	17.21 - Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0	0			0	0			0	0			2	0				
6	20.11 - Manufacture of industrial gases	0	0			0	0			0	0			62,769	506				
7	20.13 - Manufacture of other inorganic basic chemicals	0	0			0	0			0	0			40,587	6,673				
8	20.15 - Manufacture of fertilisers and nitrogen compounds	0	0			0	0			0	0			1,593	0				
9	20.16 - Manufacture of plastics in primary forms	0	0			0	0			0	0			101,811	0				
10	21.10 - Manufacture of basic pharmaceutical substances	0	0			48	0			0	0			48	0				



Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)			
		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	
PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
11	22.21 - Manufacture of plastic plates, sheets, tubes and profiles	0	0			0	0			0	0			34,651	6,341		
12	22.22 - Manufacture of plastic packing goods	15	0			0	0			0	0			15	2		
13	22.23 - Manufacture of builders' ware of plastic	0	0			0	0			0	0			41	0		
14	22.29 - Manufacture of other plastic products	0	0			0	0			0	0			12	0		
15	23.13 - Manufacture of hollow glass	0	0			0	0			0	0			43,737	0		
16	23.99 - Manufacture of abrasive products and others non-metallic mineral products not elsewhere classified	0	0			0	0			0	0			35	25		
17	24.42 - Aluminium production	0	0			0	0			0	0			162,567	29,750		
18	25.11 - Manufacture of metal structures and parts of structures	0	0			0	0			0	0			846	0		
19	25.12 - Manufacture of metal elements of building woodwork	0	0			0	0			0	0			140,978	25,799		
20	25.61 - Treatment and coating of metals	0	0			0	0			0	0			1,364	0		
21	25.62 - Mechanical working of metal elements	0	0			0	0			0	0			4,879	0		
22	25.72 - Manufacture of locks and hinges	0	0			0	0			0	0			4	0		
23	25.94 - Manufacture of fasteners and screws	0	0			0	0			0	0			5,690	0		
24	26.11 - Manufacture of electronic components	5,026	0			0	0			0	0			5,026	0		
25	26.12 - Manufacture of electronic printed circuits	137,468	0			0	0			0	0			137,468	0		
26	27.12 - Manufacture of electricity distribution and control apparatus	2,063	0			0	0			0	0			2,063	423		
27	27.51 - Manufacture of electric domestic appliances	479	0			0	0			0	0			479	0		
28	28.14 - Manufacture of other taps and valves	0	0			0	0			0	0			26,911	0		
29	28.21 - Manufacture of ovens, furnaces and furnace burners	0	0			0	0			0	0			25,573	279		
30	28.23 - Manufacture of office machinery and equipment, except computers and peripheral equipment	0	0			0	0			0	0			17,413	20		
31	28.25 - Manufacture of industrial cooling and ventilation equipment	0	0			0	0			0	0			11	0		
32	28.92 - Manufacture of machinery for mining, quarrying and construction	0	0			0	0			0	0			141,077	85,330		



Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)					
		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			
PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (PPC)		PLN'000		Of which environmentally sustainable (BIO)		PLN'000		Of which environmentally sustainable (BIO)	
PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (PPC)		PLN'000		Of which environmentally sustainable (BIO)		PLN'000		Of which environmentally sustainable (BIO)	
														Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
33	28.93 - Manufacture of machinery for food, beverage and tobacco processing	0	0			0	0			0	0			14	0				
34	28.99 - Manufacture of other special-purpose machinery not elsewhere classified	0	0			0	0			0	0			890	0				
35	29.20 - Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	0	0			0	0			0	0			135,235	8,732				
36	29.32 - Manufacture of other parts and accessories for motor vehicles excluding motorcycles	0	0			0	0			0	0			17,839	1				
37	30.12 - Building of pleasure and sporting boats	0	0			0	0			0	0			13,758	0				
38	30.20 - Manufacture of railway locomotives and rolling stock	0	0			0	0			0	0			182	0				
39	33.13 - Repair and maintenance of electronic and optical equipment	0	0			0	0			0	0			35	0				
40	33.20 - Installation of industrial machinery and equipment	0	0			2,108	0			0	0			2,108	24				
41	35.11 - Production of electricity	0	0			0	0			0	0			98,729	1,668				
42	35.22 - Distribution of gaseous fuels through mains	0	0			0	0			0	0			205	0				
43	36.00 - Water collection, treatment and supply	0	0			0	0			0	0			146	0				
44	38.11 - Collection of non-hazardous waste	3	0			0	0			0	0			3	0				
45	41.10 - Realization of building projects related to erection of buildings	36,887	0			0	0			0	0			36,887	0				
46	41.20 - Building works related to erection of residential and non-residential buildings	61,210	0			0	0			0	0			61,210	806				
47	42.11 - Works related to construction of roads and motorways	30,459	0			0	0			0	0			30,459	0				
48	42.12 - Works related to construction of railways and underground railways	3,049	0			0	0			0	0			3,049	24				
49	42.22 - Works related to construction of telecommunications and electricity lines	15,341	0			0	0			0	0			15,341	648				
50	43.29 - Other construction installation	53	0			0	0			0	0			53	0				
51	46.11 - Agents involved in the sale of agricultural raw materials, live animals, textile raw materials and semi-finished goods	10	0			0	0			0	0			10	0				
52	46.13 - Agents involved in the sale of timber and building materials	307	0			0	0			0	0			307	0				
53	46.18 - Agents specialised in the sale of other particular products	1,461	0			0	0			0	0			1,461	0				
54	46.32 - Wholesale of meat and meat products	154,571	0			0	0			0	0			154,571	0				



Breakdown by sector - NACE 4 digits level (code and label)		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab										
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)													
		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											
PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (CE)		PLN'000		Of which environmentally sustainable (PPC)		PLN'000		Of which environmentally sustainable (PPC)		PLN'000		Of which environmentally sustainable (BIO)		PLN'000		Of which environmentally sustainable (BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
55	46.34 - Wholesale of beverages	35,260	0			0	0			0	0			35,260	0												
56	46.36 - Wholesale of sugar and chocolate and sugar confectionery	27,832	0			0	0			0	0			27,832	0												
57	46.42 - Wholesale of clothing and footwear	117,411	0			0	0			0	0			117,411	0												
58	46.45 - Wholesale of perfume and cosmetics	2	0			0	0			0	0			2	0												
59	46.46 - Wholesale of pharmaceutical goods	264	0			0	0			0	0			264	0												
60	46.52 - Wholesale of electronic and telecommunications equipment and parts thereof	13,918	0			0	0			0	0			13,918	0												
61	46.69 - Wholesale of other machinery and equipment	265,796	0			0	0			0	0			265,796	0												
62	46.71 - Wholesale of fuels and related products	3	0			0	0			0	0			3	0												
63	46.72 - Wholesale of metals and metal ores	50,957	0			0	0			0	0			50,957	0												
64	46.76 - Wholesale of other intermediate products	19	0			0	0			0	0			19	0												
65	46.77 - Wholesale of waste and scrap	2,748	0			0	0			0	0			2,748	0												
66	46.90 - Non-specialised wholesale trade	2,499	0			0	0			0	0			2,499	0												
67	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	141,202	0			0	0			0	0			141,202	0												
68	47.19 - Other retail sale in non-specialised stores	6	0			0	0			0	0			6	0												
69	47.51 - Retail sale of textiles in specialised stores	326	0			0	0			0	0			326	0												
70	47.72 - Retail sale of footwear and leather goods in specialised stores	38,019	0			0	0			0	0			38,019	0												
71	47.75 - Retail sale of cosmetic and toilet articles in specialised stores	89	0			0	0			0	0			89	0												
72	47.91 - Retail sale via mail order houses or via Internet	48,202	0			0	0			0	0			48,202	0												
73	47.99 - Other retail sale not in stores, stalls or markets	28	0			0	0			0	0			28	0												
74	49.10 - Passenger rail transport, interurban	0	0			0	0			0	0			1,331	0												
75	61.10 - Wired telecommunications activities	188,767	0			0	0			0	0			188,767	0												
76	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	461,017	0			0	0			0	0			461,017	0												



		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + P + BE)			
Breakdown by sector - NACE 4 digits level (code and label)		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	
		PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (CE)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (PPC)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
77	61.30 - Satellite telecommunications activities	77,373	0			0	0			0	0			77,373	0		
78	61.90 - Other telecommunications activities	2,767	0			0	0			0	0			2,767	0		
79	62.01 - Computer programming activities	12,127	0			0	0			0	0			12,127	0		
80	63.12 - Web portals	78,304	0			0	0			0	0			78,304	0		
81	65.12 - Other personal and property insurance	0	0			0	0			0	0			1	0		
82	68.20 - Rental and operating of own or leased real estate	0	0			0	0			0	0			15,486	0		
83	71.12 - Engineering activities and related technical consultancy	0	0			919	0			0	0			919	156		
84	72.19 - Other research and experimental development on natural sciences and engineering	0	0			0	0			0	0			1,136	0		
85	77.11 - Rental and leasing of cars and light motor vehicles	1,139,265	0			0	0			0	0			1,139,265	223,296		
86	77.32 - Rental and leasing of construction machinery and equipment	57,200	0			0	0			0	0			57,200	0		
87	86.10 - Hospital activities	0	0			0	0			0	0			38,831	0		



Table 96. GAR KPI stock - based on turnover KPIs

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)		
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
		Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	63.9%	1.4%	0.3%	0.0%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	Financial undertakings	60.1%	8.2%	0.0%	0.0%	8.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	64.9%	8.9%	0.0%	0.0%	8.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
20	Non-financial undertakings	17.5%	3.9%	0.0%	0.1%	3.6%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling
GAR - Covered assets in both numerator and denominator														
21	Loans and advances	17.5%	3.9%	0.0%	0.1%	3.6%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
24	Households	71.2%	0.4%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	99.6%	0.7%	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	84.7%	0.0%	0.0%	0.0%	0.0%								
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Total GAR assets	23.6%	0.5%	0.1%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Udział Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Udział Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Udział Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional		Of which enabling				
GAR - Covered assets in both numerator and denominator																			
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	63.9%	1.4%	0.3%	0.0%	1.0%	24.3%
2	Financial undertakings	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	60.3%	8.2%	0.0%	0.0%	8.2%	1.6%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
7	Other financial corporations	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	65.2%	8.9%	0.0%	0.0%	8.9%	1.5%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
20	Non-financial undertakings	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.7%	4.0%	0.0%	0.1%	3.6%	2.9%
21	Loans and advances	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.7%	4.0%	0.0%	0.1%	3.6%	2.9%



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Udział Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Udział Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional			Of which enabling
GAR - Covered assets in both numerator and denominator																			
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
24	Households	0.0%	0.0%	0.0%	0.0%									71.2%	0.4%	0.4%	0.0%	0.0%	19.8%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									99.6%	0.7%	0.7%	0.0%	0.0%	11.5%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									100.0%	0.0%	0.0%	0.0%	0.0%	0.5%
27	of which motor vehicle loans													84.7%	0.0%	0.0%	0.0%	0.0%	2.5%
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Total GAR assets	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	23.6%	0.5%	0.1%	0.0%	0.4%	65.9%



Table 97. GAR KPI stock - based on CapEx KPIs

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m		
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				
		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)				
% (compared to total covered assets in the denominator)		Of which Use of Proceeds			Of which transitional	Of which enabling	Of which Use of Proceeds			Of which enabling	Of which Use of Proceeds			Of which enabling		
GAR - Covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	64.3%	2.1%	0.3%	0.0%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
2	Financial undertakings	62.0%	16.4%	0.0%	0.0%	15.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%		
7	Other financial corporations	67.0%	17.7%	0.0%	0.0%	16.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%		
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%		
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%		



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator															
20	Non-financial undertakings	20.0%	5.8%	0.0%	0.1%	3.2%	0.4%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
21	Loans and advances	20.0%	5.8%	0.0%	0.1%	3.2%	0.4%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
24	Households	71.2%	0.4%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
25	of which loans collateralised by residential immovable property	99.6%	0.7%	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
26	of which building renovation loans	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
27	of which motor vehicle loans	84.7%	0.0%	0.00%	0.0%	0.0%									
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
32	Total GAR assets	23.8%	0.8%	0.1%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional			Of which enabling
GAR - Covered assets in both numerator and denominator																			
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	64.4%	2.1%	0.3%	0.0%	1.4%	24.3%
2	Financial undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	62.0%	16.4%	0.0%	0.0%	15.5%	1.6%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	67.0%	17.7%	0.0%	0.0%	16.8%	1.5%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
20	Non-financial undertakings	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	20.6%	6.0%	0.0%	0.1%	3.2%	2.9%
21	Loans and advances	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	20.6%	6.0%	0.0%	0.1%	3.2%	2.9%



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af						
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total assets covered							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)											
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional			Of which enabling						
GAR - Covered assets in both numerator and denominator																									
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%						
24	Households	0.0%	0.0%	0.0%	0.0%													71.2%	0.4%	0.4%	0.0%	0.0%	19.8%		
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%													99.6%	0.7%	0.7%	0.0%	0.0%	11.5%		
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%													100.0%	0.0%	0.0%	0.0%	0.0%	0.5%		
27	of which motor vehicle loans																			84.7%	0.0%	0.0%	0.0%	0.0%	2.5%
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
32	Total GAR assets	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.5%	65.9%						



Table 98. GAR KPI flow - based on turnover KPI

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which transitional		Of which enabling	Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		
GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	38.8%	0.7%	0.1%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2	Financial undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator															
20	Non-financial undertakings	21.3%	3.0%	0.0%	0.0%	2.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
21	Loans and advances	21.3%	3.0%	0.0%	0.0%	2.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
24	Households	45.6%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
25	of which loans collateralised by residential immovable property	99.9%	1.4%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
26	of which building renovation loans	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
27	of which motor vehicle loans	100.0%	0.0%	0.0%	0.0%	0.0%									
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
32	Total GAR assets	18.5%	0.3%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total new assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional			Of which enabling
GAR - Covered assets in both numerator and denominator																			
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	38.8%	0.7%	0.1%	0.0%	0.4%	24.3%
2	Financial undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
20	Non-financial undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21.3%	3.0%	0.0%	0.0%	2.4%	4.4%



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total new assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional			Of which enabling
GAR - Covered assets in both numerator and denominator																			
21	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21.3%	3.0%	0.0%	0.0%	2.4%	4.4%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
24	Households	0.0%	0.0%	0.0%	0.0%									45.6%	0.1%	0.1%	0.0%	0.0%	18.6%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									99.9%	1.4%	1.4%	0.0%	0.0%	1.8%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									100.0%	0.0%	0.0%	0.0%	0.0%	0.5%
27	of which motor vehicle loans													100.0%	0.0%	0.0%	0.0%	0.0%	6.2%
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Total GAR assets	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	18.5%	0.3%	0.0%	0.0%	0.2%	51.0%



Table 99. GAR KPI flow - based on CapEx KPI

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	39.5%	1.4%	0.1%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2	Financial undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	



31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator															
20	Non-financial undertakings	25.1%	7.0%	0.0%	0.0%	1.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
21	Loans and advances	25.1%	7.0%	0.0%	0.0%	1.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	
24	Households	45.6%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
25	of which loans collateralised by residential immovable property	99.9%	1.4%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
26	of which building renovation loans	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					
27	of which motor vehicle loans	100.0%	0.0%	0.0%	0.0%	0.0%									
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
32	Total GAR assets	18.8%	0.7%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																			
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	39.5%	1.4%	0.1%	0.0%	0.3%	17.7%
2	Financial undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
20	Non-financial undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.1%	7.0%	0.0%	0.0%	1.7%	3.2%
21	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.1%	7.0%	0.0%	0.0%	1.7%	3.2%



31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total new assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional			Of which enabling
GAR - Covered assets in both numerator and denominator																			
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
24	Households	0.0%	0.0%	0.0%	0.0%									45.6%	0.1%	0.1%	0.0%	0.0%	13.6%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									99.9%	1.4%	1.4%	0.0%	0.0%	1.3%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									100.0%	0.0%	0.0%	0.0%	0.0%	0.4%
27	of which motor vehicle loans													100.0%	0.0%	0.0%	0.0%	0.0%	4.5%
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Total GAR assets	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	18.8%	0.7%	0.0%	0.0%	0.1%	51.0%



Table 100. KPI off-balance sheet exposures - based on turnover KPIs (stock)

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional
1	Financial guarantees (FinGuar KPI)	0.6%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2	Assets under management (AuM KPI)	3.9%	1.3%	0.0%	0.1%	0.2%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.6%	0.0%	0.0%	0.0%
2	Assets under management (AuM KPI)	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.2%	1.4%	0.0%	0.1%	0.2%



Table 101. KPI off-balance sheet exposures - based on CapEx KPIs (stock)

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which transitional		Of which enabling	Of which Use of Proceeds		Of which transitional		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	8.4%	7.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2	Assets under management (AuM KPI)	3.5%	0.8%	0.0%	0.0%	0.2%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.4%	7.0%	0.0%	0.0%	0.0%
2	Assets under management (AuM KPI)	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.8%	0.8%	0.0%	0.0%	0.2%



Table 102. KPI off-balance sheet exposures - based on turnover KPIs (flow)

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m	
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.6%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2	Assets under management (AuM KPI)	2.6%	1.3%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.6%	0.0%	0.0%	0.0%
2	Assets under management (AuM KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.6%	1.3%	0.0%	0.1%	0.0%



Table 103. KPI off-balance sheet exposures - based on CapEx KPIs (flow)

31.12.2024		a	b	c	d	e	f	g	h	i	j	k	l	m
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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)			
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds			Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling		
1	Financial guarantees (FinGuar KPI)	8.4%	7.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	Assets under management (AuM KPI)	1.7%	0.4%	0.0%	-0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

31.12.2024		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds			Of which enabling				
1	Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.4%	7.0%	0.0%	0.0%	0.0%
2	Assets under management (AuM KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.8%	0.4%	0.0%	-0.1%	0.0%

**Table 104. Nuclear and fossil gas related activities**

Row	Nuclear energy related activities	
1.	The Bank funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The Bank funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The Bank funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The Bank funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The Bank funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The Bank funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

**Table 105. Taxonomy-aligned economic activities (denominator) - based on turnover KPI (stock)**

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	24	0.0%	24	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	483	0.0%	483	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	562,197	0.5%	558,773	0.5%	3,425	0.0%
8.	Total applicable KPI	562,704	0.5%	559,279	0.5%	3,425	0.0%

Table 106. Taxonomy-aligned economic activities (numerator) - based on turnover KPI (stock)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	24	0.0%	24	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	483	0.1%	483	0.1%	0	0.0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	562,197	99.9%	558,773	99.3%	3,425	0.6%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	562,704	100.0%	559,279	99.4%	3,425	0.6%

**Table 107. Taxonomy-eligible but not taxonomy-aligned economic activities - based on turnover KPI (stock)**

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	116	0.0%	116	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	332	0.0%	332	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0.0%	4	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	25,885,140	23.1%	25,883,201	23.1%	1,939	0.0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	25,885,593	23.1%	25,883,654	23.1%	1,939	0.0%

Table 108. Taxonomy non-eligible economic activities - based on turnover KPI (stock)

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%



Row	Economic activities	Amount	%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	14,921,906	13.3%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	14,921,906	13.3%

Table 109. Taxonomy-aligned economic activities (denominator) - based on CapEx KPI (stock)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	418	0.0%	418	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	885,683	0.8%	878,423	0.8%	7,260	0.0%
8.	Total applicable KPI	886,101	0.8%	878,841	0.8%	7,260	0.0%

Table 110. Taxonomy-aligned economic activities (numerator) - based on CapEx KPI (stock)

Wiersz	Rodzaje działalności gospodarczej	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	418	0.0%	418	0.0%	0	0.0%



Wiersz	Rodzaje działalności gospodarczej	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	885,683	100.0%	878 423	99.1%	7,260	0.8%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	886,101	99.7%	878 841	99.2%	7,260	0.8%

Table 111. Taxonomy-eligible but not taxonomy-aligned economic activities - based on CapEx KPI (stock)

Wiersz	Rodzaje działalności gospodarczej	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	448	0.0%	448	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	154	0.0%	154	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	25,754,939	23.0%	25,741,828	23.0%	13,110	0.0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	25,755,541	23.0%	25,742,431	23.0%	13,110	0.0%

**Table 112. Taxonomy non-eligible economic activities - based on CapEx KPI (stock)**

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	14,732,887	13.2%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	14,732,887	13.2%

Table 113. Taxonomy-aligned economic activities (denominator) - based on turnover KPI (flow)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	201	0.0%	201	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%



Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	50,039	0.0%	50,039	0.0%	0	0.0%
8.	Total applicable KPI	50,240	0.3%	50,240	0.3%	0	0.0%

Table 114. Taxonomy-aligned economic activities (numerator) - based on turnover KPI (flow)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	201	0.4%	201	0.4%	0	0.0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	50,039	99.6%	50,039	99.6%	0	0.0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	50,240	100.0%	50,240	100.0%	0	0.0%

**Table 115. Taxonomy-eligible but not taxonomy-aligned economic activities - based on turnover KPI (flow)**

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	50	0.0%	50	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	50	0.0%	50	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	2,947,107	2.6%	2,947,107	2.6%	0	0.0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	2,947,207	18.2%	2,947,207	18.2%	0	0.0%

Table 116. Taxonomy non-eligible economic activities - based on turnover KPI (flow)

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%



Row	Economic activities	Amount	%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	4,719,593	4.2%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	4,719,593	4.2%

Table 117. Taxonomy-aligned economic activities (denominator) - based on CapEx KPI (flow)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	226	0.0%	226	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	106,542	0.7%	106,542	0.7%	0	0.0%
8.	Total applicable KPI	106,768	0.7%	106,768	0.7%	0	0.0%

**Table 118. Taxonomy-aligned economic activities (numerator) - based on CapEx KPI (flow)**

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	226	0.2%	226	0.2%	0	0.0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	106,542	99.8%	106,542	99.8%	0	0.0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	106,768	100.0%	106,768	100.0%	0	0.0%

Table 119. Taxonomy-eligible but not taxonomy-aligned economic activities - based on CapEx KPI (flow)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	25	0.0%	25	0.0%	0	0.0%



Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	50	0.0%	50	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	2,944,097	18.2%	2,944,097	18.2%	0	0.0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	2,944,173	18.2%	2,944,172	18.2%	0	0.0%

Table 120. Taxonomy non-eligible economic activities - based on CapEx (flow)

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	4,666,129	4.2%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	4,666,129	4.2%



Values of alignment indicators as at 31 December 2023

Table 121. Summary of KPIs to be disclosed by credit institutions according to Article 8 of the Systemic Regulation

		Total environmentally sustainable assets (based on REVENUE KPI)	Total environmentally sustainable assets (based CAPEX KPI)	KPI****	KPI*****	% 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	691,215	1,034,144	0.6%	0.8%	74.8%	44.8%	25.2%
Additional KPIs	GAR (flow)	134,876	266,808	0.5%	1.0%	42.9%	20.2%	57.1%
	<i>Trading book*</i>	n/d	n/d	n/d	n/d			
	<i>Financial guarantees</i>	0	0	0.0%	0.0%			
	<i>Assets under management</i>	32,500	78,422	0.6%	1.6%			
	<i>Fees and commissions income**</i>	n/d	n/d	n/d	n/d			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

** Fees and commissions income from services other than lending and AuM.

*** % of assets covered by the KPI over banks' total assets

**** based on the Turnover KPI of the counterparty

***** based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used



Table 122. Assets for the calculation of GAR - based on turnover KPIs

		a	b	c	d	e	f	g	h	i	j	ab	ac	ad	ae	af
31.12.2023		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
PLN '000		Total [gross] carrying amount	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)z systematyka)			Of which environmentally sustainable (Taxonomy-aligned)							
			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling						
<u>GAR - Covered assets in both numerator and denominator</u>																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	49,133,861	29,971,922	488,425	0	287,965	87,334	305,640	202,790	0	144,317	30,277,561	691,215	0	432,282	231,651
2	Financial undertakings	10,152,922	2,954,127	135,690	0	135,690	0	0	0	0	0	2,954,127	135,690	0	135,690	0
3	Credit institutions	8,761,246	1,624,361	0	0	0	0	0	0	0	0	1,624,361	0	0	0	0
4	Loans and advances	8,761,246	1,624,361	0	0	0	0	0	0	0	0	1,624,361	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0
7	Other financial corporations	1,391,676	1,329,766	135,690	0	135,690	0	0	0	0	0	1,329,766	135,690	0	135,690	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0
16	of which insurance undertakings	1	0	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	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0



31.12.2023		a	b	c	d	e	f	g	h	i	j	ab	ac	ad	ae	af	
PLN '000		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which environmentally sustainable (Taxonomy-aligned)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which environmentally sustainable (Taxonomy-aligned) z systematyką		Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling				
<u>GAR - Covered assets in both numerator and denominator</u>																	
20	Non-financial undertakings	3,907,682	1,226,622	352,735	0	152,275	87,334	305,640	202,790	0	144,317	1,532,262	555,525	0	296,592	231,651	
21	Loans and advances	3,907,682	1,226,622	352,735	0	152,275	87,334	305,640	202,790	0	144,317	1,532,262	555,525	0	296,592	231,651	
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
24	Households	35,038,260	25,791,173	0	0	0	0	0	0	0	0	25,791,173	0	0	0	0	
25	of which loans collateralised by residential immovable property	21,233,292	21,233,292	0	0	0	0	0	0	0	0	21,233,292	0	0	0	0	
26	of which building renovation loans	2,651,497	2,651,497	0	0	0	0	0	0	0	0	2,651,497	0	0	0	0	
27	of which motor vehicle loans	1,551,969	1,017,850	0	0	0	0					1,017,850	0	0	0	0	
28	Local governments financing	34,997	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
30	Other local government financing	34,997	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
32	<u>Assets excluded from the numerator for GAR calculation (covered in the denominator)</u>	73,193,835															
33	Financial and Non-financial undertakings	57,719,273															
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	48,055,159															
35	Loans and advances	47,841,397															
36	of which loans collateralised by commercial immovable property	21,200,683															
37	of which building renovation loans	6,404,603															
38	Debt securities	82,068															
39	Equity instruments	131,694															



		a	b	c	d	e	f	g	h	i	j	ab	ac	ad	ae	af
31.12.2023		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
PLN '000		Total [gross] carrying amount	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned) z systematyką			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling		
<u>GAR - Covered assets in both numerator and denominator</u>																
40	Non-EU country counterparties not subject to NFRD disclosure obligations	62,292														
41	Loans and advances	3,407														
42	Debt securities	0														
43	Equity instruments	58,885														
44	Derivatives	529,173														
45	On demand interbank loans	8,991,478														
46	Cash and cash-related assets	2,426,914														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	3,526,996														
48	Total GAR assets	122,327,696	29,971,922	488,425	0	287,965	87,334	305,640	202,790	0	144,317	30,277,561	691,215	0	432,282	231,651
49	<u>Assets not covered for GAR calculation</u>	41,229,452														
50	Central governments and Supranational issuers	30,724,935														
51	Central banks exposure	7,804,602														
52	Trading book	2,699,915														
53	<u>Total assets</u>	163,557,148	29,971,922	488,425	0	287,965	87,334	305,640	202,790	0	144,317	30,277,561	691,215	0	432,282	231,651
<u>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</u>																
54	Financial guarantees	71,933	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	5,006,713	294,206	31,134	0	9,878	15,896	2,096	1,367	0	1,039	296,303	32,500	0	10,917	16,935
56	Of which debt securities	1,894,277	279,168	27,281	0	9,539	13,498	0	0	0	0	279,168	27,281	0	9,539	13,498
57	Of which equity instruments	977,115	15,039	3,852	0	339	2,399	2,096	1,367	0	1,039	17,135	5,219	0	1,377	3,438



Table 123. Assets for the calculation of GAR - based on CapEx KPIs

31.12.2023 PLN '000		a	b	c	d	e	f	g	h	i	j	ab	ac	ad	ae	af	
		Total [gross] carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				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 environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds		Of which transitional		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional		Of which enabling
<u>GAR - Covered assets in both numerator and denominator</u>																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	49,133,861	30,759,468	593,841	0	359,986	122,459	475,822	440,303	0	147,354	31,235,289	1,034,144	0	507,340	269,813	
2	Financial undertakings	10,152,922	3,005,347	298,519	0	271,381	27,138	0	0	0	0	3,005,347	298,519	0	271,381	27,138	
3	Credit institutions	8,761,246	1,648,443	0	0	0	0	0	0	0	0	1,648,443	0	0	0	0	
4	Loans and advances	8,761,246	1,648,443	0	0	0	0	0	0	0	0	1,648,443	0	0	0	0	
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
7	Other financial corporations	1,391,676	1,356,904	298,519	0	271,381	27,138	0	0	0	0	1,356,904	298,519	0	271,381	27,138	
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
16	of which insurance undertakings	1	0	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	0	
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
20	Non-financial undertakings	3,907,682	1,962,948	295,322	0	88,605	95,321	475,822	440,303	0	147,354	2,438,770	735,625	0	235,959	242,675	



31.12.2023 PLN '000		a	b	c	d	e	f	g	h	i	j	ab	ac	ad	ae	af	
		Total [gross] carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				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 environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
<u>GAR - Covered assets in both numerator and denominator</u>																	
21	Loans and advances	3,907,682	1,962,948	295,322	0	88,605	95,321	475,822	440,303	0	147,354	2,438,770	735,625	0	235,959	242,675	
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
24	Households	35,038,260	25,791,173	0	0	0	0	0	0	0	0	25,791,173	0	0	0	0	
25	of which loans collateralised by residential immovable property	21,233,292	21,233,292	0	0	0	0	0	0	0	0	21,233,292	0	0	0	0	
26	of which building renovation loans	2,651,497	2,651,497	0	0	0	0	0	0	0	0	2,651,497	0	0	0	0	
27	of which motor vehicle loans	1,551,969	1,017,850	0	0	0	0					1,017,850	0	0	0	0	
28	Local governments financing	34,997	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
30	Other local government financing	34,997	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
32	<u>Assets excluded from the numerator for GAR calculation (covered in the denominator)</u>	73,193,835															
33	Financial and Non-financial undertakings	57,719,273															
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	48,055,159															
35	Loans and advances	47,841,397															
36	of which loans collateralised by commercial immovable property	21,200,683															
37	of which building renovation loans	6,404,603															
38	Debt securities	82,068															
39	Equity instruments	131,694															
40	Non-EU country counterparties not subject to NFRD disclosure obligations	62,292															
41	Loans and advances	3,407															



31.12.2023		a	b	c	d	e	f	g	h	i	j	ab	ac	ad	ae	af
PLN '000		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			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 environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)					
								Of which Use of Proceeds	Of which transitional	Of which enabling				Of which Use of Proceeds	Of which transitional	Of which enabling
<u>GAR - Covered assets in both numerator and denominator</u>																
42	Debt securities	0														
43	Equity instruments	58,885														
44	Derivatives	529,173														
45	On demand interbank loans	8,991,478														
46	Cash and cash-related assets	2,426,914														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	3,526,996														
48	Total GAR assets	122,327,696	30,759,468	593,841	0	359,986	122,459	475,822	440,303	0	147,354	31,235,289	1,034,144	0	507,340	269,813
49	<u>Assets not covered for GAR calculation</u>	41,229,452														
50	Central governments and Supranational issuers	30,724,935														
51	Central banks exposure	7,804,602														
52	Trading book	2,699,915														
53	Total assets	163,557,148	30,759,468	593,841	0	359,986	122,459	475,822	440,303	0	147,354	31,235,289	1,034,144	0	507,340	269,813
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	71,933	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	5,006,713	252,351	75,283	0	3,108	39,646	3,391	3,139	0	1,039	255,742	78,422	0	4,147	40,685
56	Of which debt securities	1,894,277	218,875	69,796	0	2,899	37,461	0	0	0	0	218,875	69,796	0	2,899	37,461
57	Of which equity instruments	977,115	33,476	5,486	0	209	2,185	3,391	3,139	0	1,039	36,867	8,625	0	1,248	3,224



Table 124. GAR sector information - based on turnover KPIs

Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	y	z	aa	ab		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
1	16.10 - Sawmilling and planing of wood	0	0			0	0			0	0				
2	16.23 - Manufacture of other builders' carpentry and joinery	37	34			0	0			37	34				
3	17.12 - Manufacture of paper and paperboard	0	0			0	0			0	0				
4	20.13 - Manufacture of other inorganic basic chemicals	11,372	1,428			0	0			11,372	1,428				
5	20.15 - Manufacture of fertilisers and nitrogen compounds	6,933	0			0	0			6,933	0				
6	22.11 - Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	0	0			0	0			0	0				
7	22.21 - Manufacture of plastic plates, sheets, tubes and profiles	940	497			0	0			940	497				
8	22.22 - Manufacture of plastic packing goods	182	18			0	0			182	18				
9	22.29 - Manufacture of other plastic products	0	0			0	0			0	0				
10	23.13 - Manufacture of hollow glass	0	0			0	0			0	0				
11	23.61 - Manufacture of concrete products for construction purposes	212,638	84,337			0	0			212,638	84,337				
12	24.10 - Manufacture of pig iron, ferro-alloys, basic iron and steel and metallurgic articles	88	0			0	0			88	0				
13	24.32 - Cold rolling of narrow strip	0	0			0	0			0	0				
14	24.42 - Aluminium production	151,542	80,083			0	0			151,542	80,083				
15	25.11 - Manufacture of metal structures and parts of structures	0	0			0	0			0	0				
16	25.12 - Manufacture of metal elements of building woodwork	36,368	19,219			0	0			36,368	19,219				
17	25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy	2,338	0			0	0			2,338	0				
18	25.94 - Manufacture of fasteners and screws	1,175	0			0	0			1,175	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	y	z	aa	ab		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (CCA)	
PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)					
19	27.12 - Manufacture of electricity distribution and control apparatus	0	0			0	0			0	0				
20	27.51 - Manufacture of electric domestic appliances	2,832	650			1	1			2,834	651				
21	28.14 - Manufacture of other taps and valves	24	0			0	0			24	0				
22	28.21 - Manufacture of ovens, furnaces and furnace burners	0	0			0	0			0	0				
23	28.49 - Manufacture of other mechanical tools	0	0			0	0			0	0				
24	28.92 - Manufacture of machinery for mining, quarrying and construction	11,065	11,092			0	0			11,065	11,092				
25	29.20 - Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	0	0			0	0			0	0				
26	29.32 - Manufacture of other parts and accessories for motor vehicles excluding motorcycles	23	0			0	0			23	0				
27	33.17 - Repair and maintenance of other transport equipment	0	0			0	0			0	0				
28	35.11 - Production of electricity	11,112	4,112			0	0			11,112	4,112				
29	35.30 - Steam, hot water and air conditioning manufacturing and supply	38,414	4,822			0	0			38,414	4,822				
30	41.20 - Building works related to erection of residential and non-residential buildings	84,180	78,530			295,478	192,629			379,658	271,159				
31	42.11 - Works related to construction of roads and motorways	18,217	16,995			0	0			18,217	16,995				
32	42.12 - Works related to construction of railways and underground railways	0	0			0	0			0	0				
33	46.32 - Wholesale of meat and meat products	0	0			0	0			0	0				
34	46.34 - Wholesale of beverages	0	0			0	0			0	0				
35	46.42 - Wholesale of clothing and footwear	0	0			0	0			0	0				
36	46.46 - Wholesale of pharmaceutical goods	0	0			0	0			0	0				
37	46.75 - Wholesale of chemical products	0	0			0	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	y	z	aa	ab		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (CCA)	
PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
38	46.90 - Non-specialised wholesale trade	123,411	15,490			0	0			123,411	15,490				
39	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	83,643	230			0	0			83,643	230				
40	47.71 - Retail sale of clothing in specialised stores	0	0			0	0			0	0				
41	47.72 - Retail sale of footwear and leather goods in specialised stores	22	7			0	0			22	7				
42	59.11 - Motion picture, video and television programme production activities	0	0			0	0			0	0				
43	59.14 - Motion picture projection activities	294	156			10,160	10,160			10,455	10,316				
44	61.10 - Wired telecommunications activities	72	22			0	0			72	22				
45	61.30 - Satellite telecommunications activities	6,222	519			0	0			6,222	519				
46	61.90 - Other telecommunications activities	0	0			0	0			0	0				
47	62.01 - Computer programming activities	16,225	13			0	0			16,225	13				
48	62.02 - Computer consultancy activities	14,065	14,065			0	0			14,065	14,065				
49	63.12 - Web portals	0	0			0	0			0	0				
50	68.20 - Rental and operating of own or leased real estate	238,346	0			0	0			238,346	0				
51	71.12 - Engineering activities and related technical consultancy	253	26			0	0			253	26				
52	77.11 - Rental and leasing of cars and light motor vehicles	397,862	40,600			0	0			397,862	40,600				
53	86.10 - Hospital activities	0	0			0	0			0	0				



Table 125. GAR sector information - based on turnover KPIs - based on CapEx KPIs

Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	y	z	aa	ab		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (CCA)	
PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
1	16.10 - Sawmilling and planing of wood	351	0			0	0			351	0				
2	16.23 - Manufacture of other builders' carpentry and joinery	1	0			0	0			1	0				
3	17.12 - Manufacture of paper and paperboard	0	0			0	0			0	0				
4	20.13 - Manufacture of other inorganic basic chemicals	11,720	0			0	0			11,720	0				
5	20.15 - Manufacture of fertilisers and nitrogen compounds	136,615	4,899			0	0			136,615	4,899				
6	22.11 - Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	0	0			0	0			0	0				
7	22.21 - Manufacture of plastic plates, sheets, tubes and profiles	749	349			0	0			749	349				
8	22.22 - Manufacture of plastic packing goods	4,719	3,678			0	0			4,719	3,678				
9	22.29 - Manufacture of other plastic products	17,124	0			0	0			17,124	0				
10	23.13 - Manufacture of hollow glass	0	0			0	0			0	0				
11	23.61 - Manufacture of concrete products for construction purposes	212,650	84,339			0	0			212,650	84,339				
12	24.10 - Manufacture of pig iron, ferro-alloys, basic iron and steel and metallurgic articles	1,218	508			0	0			1,218	508				
13	24.32 - Cold rolling of narrow strip	0	0			0	0			0	0				
14	24.42 - Aluminium production	120,711	56,292			0	0			120,711	56,292				
15	25.11 - Manufacture of metal structures and parts of structures	0	0			0	0			0	0				
16	25.12 - Manufacture of metal elements of building woodwork	28,969	13,509			0	0			28,969	13,509				
17	25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy	9,911	0			0	0			9,911	0				
18	25.94 - Manufacture of fasteners and screws	4,981	0			0	0			4,981	0				
19	27.12 - Manufacture of electricity distribution and control apparatus	0	0			0	0			0	0				



Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	y	z	aa	ab		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				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			
PLN'000		Of which environmentally sustainable (CCM)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (CCA)		PLN'000		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
20	27.51 - Manufacture of electric domestic appliances	4,293	423			507	507			4,800	930				
21	28.14 - Manufacture of other taps and valves	100	0			0	0			100	0				
22	28.21 - Manufacture of ovens, furnaces and furnace burners	0	0			0	0			0	0				
23	28.49 - Manufacture of other mechanical tools	0	0			0	0			0	0				
24	28.92 - Manufacture of machinery for mining, quarrying and construction	11,930	6,832			0	0			11,930	6,832				
25	29.20 - Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	0	0			0	0			0	0				
26	29.32 - Manufacture of other parts and accessories for motor vehicles excluding motorcycles	317	132			0	0			317	132				
27	33.17 - Repair and maintenance of other transport equipment	0	0			0	0			0	0				
28	35.11 - Production of electricity	22,050	20,230			0	0			22,050	20,230				
29	35.30 - Steam, hot water and air conditioning manufacturing and supply	39,590	0			0	0			39,590	0				
30	41.20 - Building works related to erection of residential and non-residential buildings	2,714	244			463,493	427,974			466,207	428,218				
31	42.11 - Works related to construction of roads and motorways	587	53			0	0			587	53				
32	42.12 - Works related to construction of railways and underground railways	0	0			0	0			0	0				
33	46.32 - Wholesale of meat and meat products	0	0			0	0			0	0				
34	46.34 - Wholesale of beverages	0	0			0	0			0	0				
35	46.42 - Wholesale of clothing and footwear	15,681	0			0	0			15,681	0				
36	46.46 - Wholesale of pharmaceutical goods	0	0			0	0			0	0				
37	46.75 - Wholesale of chemical products	5	2			0	0			5	2				
38	46.90 - Non-specialised wholesale trade	134,687	0			0	0			134,687	0				
39	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	153,342	306			0	0			153,342	306				



		a	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Breakdown by sector - NACE 4 digits level (code and label)		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject 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	
		PLN'000	Of which environmentally sustainable (CCM)	PLN'000	Of which environmentally sustainable (CCM)	PLN'000	Of which environmentally sustainable (CCA)	PLN'000	Of which environmentally sustainable (CCA)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	PLN'000	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
40	47.71 - Retail sale of clothing in specialised stores	25,788	1,575			0	0			25,788	1,575		
41	47.72 - Retail sale of footwear and leather goods in specialised stores	21,450	0			0	0			21,450	0		
42	59.11 - Motion picture, video and television programme production activities	0	0			0	0			0	0		
43	59.14 - Motion picture projection activities	10,467	4,488			11,822	11,822			22,290	16,311		
44	61.10 - Wired telecommunications activities	670	7			0	0			670	7		
45	61.30 - Satellite telecommunications activities	2,288	372			0	0			2,288	372		
46	61.90 - Other telecommunications activities	0	0			0	0			0	0		
47	62.01 - Computer programming activities	28,583	5			0	0			28,583	5		
48	62.02 - Computer consultancy activities	41,100	24,379			0	0			41,100	24,379		
49	63.12 - Web portals	0	0			0	0			0	0		
50	68.20 - Rental and operating of own or leased real estate	240,317	0			0	0			240,317	0		
51	71.12 - Engineering activities and related technical consultancy	176	160			0	0			176	160		
52	77.11 - Rental and leasing of cars and light motor vehicles	412,190	104,586			0	0			412,190	104,586		
53	86.10 - Hospital activities	0	0			0	0			0	0		



Table 126. GAR KPI stock - based on turnover KPIs

31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	24.5%	0.4%	0.0%	0.2%	0.1%	0.2%	0.2%	0.0%	0.1%	24.8%	0.6%	0.0%	0.4%	0.2%	30.0%	
2	Financial undertakings	2.4%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	2.4%	0.1%	0.0%	0.1%	0.0%	6.2%	
3	Credit institutions	1.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	5.4%	
4	Loans and advances	1.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	5.4%	
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
7	Other financial corporations	1.1%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	1.1%	0.1%	0.0%	0.1%	0.0%	0.9%	
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
20	Non-financial undertakings	1.0%	0.3%	0.0%	0.1%	0.1%	0.2%	0.2%	0.0%	0.1%	1.3%	0.5%	0.0%	0.2%	0.2%	2.4%	



31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to total covered assets in the denominator)		Of which Use of Proceeds			Of which transitional	Of which enabling	Of which Use of Proceeds			Of which enabling	Of which Use of Proceeds			Of which transitional	Of which enabling	Proportion of total assets covered	
GAR - Covered assets in both numerator and denominator																	
21	Loans and advances	1.0%	0.3%	0.0%	0.1%	0.1%	0.2%	0.2%	0.0%	0.1%	1.3%	0.5%	0.0%	0.2%	0.2%	2.4%	
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
24	Households	21.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21.1%	0.0%	0.0%	0.0%	0.0%	21.4%	
25	of which loans collateralised by residential immovable property	17.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.4%	0.0%	0.0%	0.0%	0.0%	13.0%	
26	of which building renovation loans	2.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.2%	0.0%	0.0%	0.0%	0.0%	1.6%	
27	of which motor vehicle loans	0.8%	0.0%	0.0%	0.0%	0.0%					0.8%	0.0%	0.0%	0.0%	0.0%	0.9%	
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
32	Total GAR assets	24.5%	0.4%	0.0%	0.2%	0.1%	0.2%	0.2%	0.0%	0.1%	24.8%	0.6%	0.0%	0.4%	0.2%	74.8%	



Table 127. GAR KPI stock - based on CapEx KPIs

31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	25.1%	0.5%	0.0%	0.3%	0.1%	0.4%	0.4%	0.0%	0.1%	25.5%	0.8%	0.0%	0.4%	0.2%	30.0%	
2	Financial undertakings	2.5%	0.2%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	2.5%	0.2%	0.0%	0.2%	0.0%	6.2%	
3	Credit institutions	1.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	5.4%	
4	Loans and advances	1.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	5.4%	
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
7	Other financial corporations	1.1%	0.2%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	1.1%	0.2%	0.0%	0.2%	0.0%	0.9%	
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
20	Non-financial undertakings	1.6%	0.2%	0.0%	0.1%	0.1%	0.4%	0.4%	0.0%	0.1%	2.0%	0.6%	0.0%	0.2%	0.2%	2.4%	



31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
21	Loans and advances	1.6%	0.2%	0.0%	0.1%	0.1%	0.4%	0.4%	0.0%	0.1%	2.0%	0.6%	0.0%	0.2%	0.2%	2.4%	
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
24	Households	21.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21.1%	0.0%	0.0%	0.0%	0.0%	21.4%	
25	of which loans collateralised by residential immovable property	17.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.4%	0.0%	0.0%	0.0%	0.0%	13.0%	
26	of which building renovation loans	2.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.2%	0.0%	0.0%	0.0%	0.0%	1.6%	
27	of which motor vehicle loans	0.8%	0.0%	0.0%	0.0%	0.0%					0.8%	0.0%	0.0%	0.0%	0.0%	0.9%	
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
32	Total GAR assets	25.1%	0.5%	0.0%	0.3%	0.1%	0.4%	0.4%	0.0%	0.1%	25.5%	0.8%	0.0%	0.4%	0.2%	74.8%	



Table 128. GAR KPI flow - based on turnover KPI

31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	10.4%	0.2%	0.0%	0.1%	0.1%	0.5%	0.3%	0.0%	0.2%	11.0%	0.5%	0.0%	0.3%	11.0%	22.7%	
2	Financial undertakings	6.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.6%	0.0%	0.0%	0.0%	6.6%	13.6%	
3	Credit institutions	6.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.2%	0.0%	0.0%	0.0%	6.2%	13.2%	
4	Loans and advances	6.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.2%	0.0%	0.0%	0.0%	6.2%	13.2%	
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
7	Other financial corporations	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.4%	0.4%	
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	



31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
20	Non-financial undertakings	0.7%	0.1%	0.0%	0.0%	0.1%	0.5%	0.3%	0.0%	0.2%	1.2%	0.5%	0.0%	0.3%	1.3%	1.3%	
21	Loans and advances	0.7%	0.1%	0.0%	0.0%	0.1%	0.5%	0.3%	0.0%	0.2%	1.2%	0.5%	0.0%	0.3%	1.3%	1.3%	
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
24	Households	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	0.0%	0.0%	0.0%	3.1%	7.8%	
25	of which loans collateralised by residential immovable property	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%	1.0%	0.2%	
26	of which building renovation loans	2.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.2%	0.0%	0.0%	0.0%	2.2%	0.9%	
27	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%	0.0%	1.2%	
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
32	Total GAR assets	10.4%	0.2%	0.0%	0.1%	0.1%	0.5%	0.3%	0.0%	0.2%	11.0%	0.5%	0.0%	0.3%	11.0%	42.9%	



Table 129. GAR KPI flow - based on CapEx KPI

31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	10.8%	0.3%	0.0%	0.2%	0.1%	0.8%	0.8%	0.0%	0.3%	11.6%	1.0%	0.0%	0.4%	11.7%	22.7%	
2	Financial undertakings	6.7%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	6.7%	0.1%	0.0%	0.1%	6.7%	13.6%	
3	Credit institutions	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.3%	0.0%	0.0%	0.0%	6.3%	13.2%	
4	Loans and advances	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.3%	0.0%	0.0%	0.0%	6.3%	13.2%	
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
7	Other financial corporations	0.4%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.1%	0.0%	0.1%	0.4%	0.4%	
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
20	Non-financial undertakings	0.9%	0.1%	0.0%	0.0%	0.1%	0.8%	0.8%	0.0%	0.3%	1.7%	0.9%	0.0%	0.3%	1.8%	1.3%	



31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	af	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
21	Loans and advances	0.9%	0.1%	0.0%	0.0%	0.1%	0.8%	0.8%	0.0%	0.3%	1.7%	0.9%	0.0%	0.3%	1.8%	1.3%	
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	
24	Households	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	0.0%	0.0%	0.0%	3.1%	7.8%	
25	of which loans collateralised by residential immovable property	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%	1.0%	0.2%	
26	of which building renovation loans	2.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.2%	0.0%	0.0%	0.0%	2.2%	0.9%	
27	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%	0.0%	1.2%	
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
32	Total GAR assets	10.8%	0.3%	0.0%	0.2%	0.1%	0.8%	0.8%	0.0%	0.3%	11.6%	1.0%	0.0%	0.4%	11.7%	42.9%	



Table 130. KPI off-balance sheet exposures - based on turnover KPIs

31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional		Of which enabling	Of which Use of Proceeds		Of which transitional		Of which enabling	Of which Use of Proceeds		Of which transitional		Of which enabling
1	Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2	Assets under management (AuM KPI)	5.9%	0.6%	0.0%	0.2%	0.3%	0.0%	0.0%	0.0%	0.0%	5.9%	0.6%	0.0%	0.2%	0.3%	

In accordance with the templates established in Annex VI to Regulation 2021/2178, the Bank discloses detailed information for the KPI for off-balance sheet exposures with respect to stock. The KPI with respect to flow for financial guarantees is 0%. The Group does not disclose KPIs for assets under management with respect to flow due to regulatory concerns about BNPP TFI's capacity to disclose such data.

Table 131. KPI off-balance sheet exposures - based on CapEx KPIs

31.12.2023		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional		Of which enabling	Of which Use of Proceeds		Of which transitional		Of which enabling	Of which Use of Proceeds		Of which transitional		Of which enabling
1	Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2	Assets under management (AuM KPI)	5.0%	1.5%	0.0%	0.1%	0.8%	0.1%	0.1%	0.0%	0.0%	5.1%	1.6%	0.0%	0.1%	0.8%	

In accordance with the templates established in Annex VI to Regulation 2021/2178, the Bank discloses detailed information for the KPI for off-balance sheet exposures with respect to stock. The KPI with respect to flow for financial guarantees is 0%. The Group does not disclose KPIs for assets under management with respect to flow due to regulatory concerns about BNPP TFI's capacity to disclose such data.

**Table 132. Nuclear and fossil gas related activities**

Row	Nuclear energy related activities	
1.	The Bank funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The Bank funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The Bank funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The Bank funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The Bank funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The Bank funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

**Table 133. Taxonomy-eligible but not taxonomy-aligned economic activities - based on CapEx KPI**

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,335	0.0%	2,335	0.0%	0	0.0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	0	0.0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	30,198,811	24.7%	30,163,292	24.7%	35,518	0.0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	30,201,145	24.7%	30,165,627	24.7%	35,518	0.0%

Following a review of the loan portfolio, the Bank identified an insignificant exposure towards fossil gas activities on the basis of the analysis of Taxonomy KPIs disclosed by its Clients, the exposure relates only to the analysis based on CapEx KPIs and relates exclusively to Taxonomy-eligible and non-aligned activities. Accordingly, the Bank only discloses the above table on the basis of the template set forth in Annex XII to Regulation 2021/2178. The Bank does not disclose the other templates set forth in Annex XII, as in each of them the exposures related to the financing of nuclear or natural gas activities would be zero.



Own workforce (ESRS S1)

BNP Paribas Bank Polska S.A. (the Bank) is convinced that an engaged and satisfied employee guarantees a high level of Customer satisfaction. Therefore, it is crucial for us to provide an environment that supports the development of employees, their activity and creativity, but also accepts mistakes resulting from testing brave, non-standard solutions. For this purpose, the Bank promotes the values of empowerment, cooperation, courage, simplicity and transparency among its employees. Applying them in our daily work will enable us to respond dynamically to changing market conditions and contribute to the effective realisation of our strategic ambitions.

The Bank, together with its subsidiaries, forms the BNP Paribas Bank Polska Group (the Group), which is ranked sixth in the Polish banking sector regarding total assets. The Group's headcount expressed in active FTEs is 7,512.

Policies

For the purposes of countering negative impact and threats, but also strengthening important opportunities, the Group has policies in place, including: the BNP Paribas Group Code of Conduct (Code of Conduct), the Human Resources Management Policy, the Policy on Dealing with Violations of Respect for Others, the Diversity Management Policy, the Employee Recruitment Policy, the Employee Training and Development Policy, and the Employee Remuneration Policy. Descriptions of the policies in Table 135 below.

Actions

The Group describes in its policies the principles and actions to address the significant impacts, risks and opportunities associated with the Group's employees, including the promotion of an inclusive culture, prevention of discrimination, harassment and violence in the workplace, social protection, prevention of psychosocial risks, measures for professional equality, civil society and skills development.

Metrics and targets

The Bank is pursuing the goals that were implemented as commitments within GO beyond strategy. The indicators presented in this section correspond to the Group's employment data, as well as all data relating to the working conditions of the Group's employees (employment conditions, decent pay, social dialogue, social protection, work-life balance, health and safety) and equal treatment of employees (professional equality, training and skills development, people with disabilities, diversity, prevention of violence and harassment).

Strategy

Interests and views of stakeholders (ESRS 2 – SBM-2)

For the Group, employees are a key stakeholders group whose interests, views and rights must be integrated into its strategy and business model. As a responsible employer, we ensure that the rights of employees are respected, both those employed under a contract of employment and those in a relationship with the Group under other forms of employment (contract, civil law contracts).

The Group has conducted a comprehensive impact assessment to identify significant negative impacts that may affect its employees, as well as risks and opportunities related to own workforce.

To achieve the strategic goals and objectives set, a high level of alignment and linkage is required between the Bank's strategy and the Human Resources Area's (HR Area's) mission, which translates business requirements into expectations of employees. At the same time, the HR Area's operating model, based on HR Business Partners, is aligned and integrated with the business model. This model strongly integrates the HR Area with its Customers and business partners.

For the Bank as an employer, acquiring and retaining talented employees and benefiting from their competencies is giving a chance to achieve a competitive advantage.

Competent and proactive people management is crucial in building the Group's competitive advantage. The skilful application of HR knowledge and solutions in practice makes it possible to create added value for stakeholders and to benefit from market opportunities arising in the environment.

Accordingly, the role of the Human Resources Area is to support managers in managing human potential and to continue to build the Bank's image as a good employer. More in [Interests and views of stakeholders \(SBM-2\)](#) section.

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 – SBM-3)

As set out in the section [Description of the process to identify and assess material impacts, risks and opportunities \(IRO-1\)](#), the Group has identified a number of impacts, risks and opportunities (IROs) related to its own employee resources (see also Table 134).

The Bank, as a responsible employer, attaches great importance to the development of its employees, including those employed in a form other than a contract of employment, and to provide them with a motivating working environment in which everyone is treated with respect, dignity and on an equal basis. Violations results in a high probability of future losses, mainly to the physical and mental health of employees and the proper functioning of the organisation as a whole. These cover a wide spectrum of situations, e.g. aggression, violence at work, sexual harassment, discrimination, etc.

Risks may also arise from the Bank's liability if it fails to protect the health and safety of its employees. It is therefore important to identify these violations at the earliest possible stage and to take appropriate action to prevent them. Behaviour or actions towards another person that do not amount to discrimination or harassment may nevertheless be behaviour or actions that do not comply with the Code of Conduct's principles of respect for others.

Adverse effects regardless of their form, they must not be tolerated as they contribute to the deterioration of the working conditions of both the person who experiences them and the team in which they work. Any person providing services to the Group has the opportunity to report violations without fear of retaliation against them.

The DMA process took into account information from internal and external stakeholders, including employees, NGOs and Customers and investors. Material topics reported by external stakeholders mainly concerned diversity issues and



insufficient accuracy in publishing the so-called pay gap. For more on stakeholder dialogue, see section: Interests and views of stakeholders (SBM-2).

The impact and risk assessment was also based on an internal analysis of risks in the Risk ID tool related to employment reported by the different business lines in which the Group operates, combining risk events and risk factors. Due to the nature of the Group's operations, there are no incidents related to forced or child labour.

Impacts identified by the Group

Among the material impacts reported in the 2023 survey:

- issues identified by internal stakeholders (employees):
 - occupational health and safety (e.g. health and safety management systems, number of accidents at work);
 - working time (e.g. compliance with overtime restrictions).
- issues identified by external stakeholders:
 - employment security (e.g. types of contracts concluded with staff);
 - remuneration policies (including diversity);
 - working time (e.g. compliance with overtime restrictions), work-life balance.

Material risks identified by the Group

Based on the analysis of risk indicators conducted periodically in the Group, risks relevant to the financial result were identified:

- **Psychosocial risks:** recent changes in working methods, the COVID-19 pandemic, military action in Ukraine, and a rapidly changing environment are likely to increase pressure at work, which may be intensified by inappropriate behaviour by supervisors. These factors may have consequences for the health of employees and include potential risks from unhealthy lifestyles, psychosocial risks and possible job burnout.
- **Risk of litigation and related legal costs:** risks related to discrimination (which can include harassment), wrong contract performance or unequal treatment can lead to disputes and claims by employees against the Group. Legal action taken by employees as a result of these reasons can result in significant legal costs.

Opportunities identified by the Group

The Group focuses on opportunities and ensuring resilience against risks that may have a financial impact, including an impact on strategic planning and risk management, but also a non-financial impact.

Opportunities of gender diversity and work-life balance: promoting gender diversity, especially in the governing body and senior management, as well as work-life balance initiatives: the Two Hours for Family/ Human, Two Hours for Health, Good

Kilometers campaigns, the MyBenefit cafeteria system (cyclical points top-ups for employees), holiday subsidies for employees and their children, Bank Close to the Family campaigns and activities - e.g. parent week, intranet page for parents. By supporting an inclusive, sustainable and supportive working environment, we attract the best experts.

Skills development opportunities: training and development programmes, including the learning and development of new skills, promoting employee satisfaction and loyalty, thus reducing external recruitment costs for the Group. They also enable the strengthening of employees' skills in line with future needs. In 2024, 99 topics were delivered in 270 sessions as part of the #MyWay training initiative. They were attended by 4,694 participants. As part of this initiative, there is an internal knowledge-sharing programme #MamToDamTo, where - 34 topics in 150 sessions were delivered and 1 883 participants attended. The result of these activities is an increase in employment perspectives and internal mobility of employees. All these elements contribute to an overall increase in the Group's organisational efficiency.

At the stage of conducting the DMA analysis, it was not possible to quantify financially the opportunities listed above for the Group and therefore they were not considered as material opportunities in the double materiality assessment process (see Table 134 below).



Table 134. Summary of material impacts and risks, and how they are addressed in our policies and actions

Category	Title of the material IRO	Policies	Actions	Metrics	Targets
Impacts	Discrimination, inequality and exclusion	Code of Conduct, Deployment of worldwide agreement on fundamental rights and global social framework, The prevention, detection and management of misconducts related to the Code of Conduct 'Respect for persons', Diversity Management Policy in BNP Paribas Bank Polska S.A., Employee Remuneration Policy	Diversity and inclusion initiatives	<ul style="list-style-type: none"> Employee characteristics Scope of collective bargaining and social dialogue Diversity index Adequate remuneration People with disabilities Training and skills development indicators Work-life balance indicators Remuneration metrics Incidents, complaints and human rights violations 	Share of women in the Bank's Management Board [vs. 2021] 22% » 30% (2025)
	Violence and mobbing at workplace	Code of Conduct, Deployment of worldwide agreement on fundamental rights and global social framework, The prevention, detection and management of misconducts related to the Code of Conduct 'Respect for persons', Complaints and requests in employee matters - Procedure manual, Whistleblowing policy, Anti-fraud policy	Whistleblowing channels - discrimination, harassment and mobbing incidents reporting. Remedial actions (disciplinary and support measures, follow-up)	<ul style="list-style-type: none"> Employee characteristics Occupational health and safety indicators Incidents, complaints and human rights violations 	eNPS [vs. 2021] -9 » 20 (2025) Employees' Net Promoter Score indicator
	Negative effects on health and safety at work	Deployment of worldwide agreement on fundamental rights and global social framework, Code of Conduct, Introduction of position-specific occupational health and safety instructions in BNP Paribas Bank Polska SA.	Program DOBRZE, Occupational Safety and Health, Whistleblowing channels - discrimination, harassment and mobbing incidents reporting	<ul style="list-style-type: none"> Employee characteristics Scope of collective bargaining and social dialogue agreements Social protection Occupational health and safety indicators Work-life balance indicators 	eNPS [vs. 2021] -9 » 20 (2025) Employees' Net Promoter Score indicator
Risks	Psychosocial risk	Deployment of worldwide agreement on fundamental rights and global social framework	Program DOBRZE, Occupational Safety and Health, whistleblowing system	<ul style="list-style-type: none"> Employee characteristics Occupational health and safety indicators 	eNPS [vs. 2021] -9 » 20 (2025) Employees' Net Promoter Score indicator
	Risk of litigation and related legal costs due to discrimination or unequal treatment	Code of Conduct, Deployment of worldwide agreement on fundamental rights and global social framework, Employee recruitment policy in BNP Paribas Bank Polska S.A., Employee Remuneration Policy, Diversity Management Policy in BNP Paribas Bank Polska S.A., Human resources management policy	RCSA (Operational Risk and Control Self-Assessment) operational risk event record RiskCare, KRI key risk indicators	<ul style="list-style-type: none"> Employee characteristics Incidents, complaints and human rights violations 	eNPS [vs. 2021] -9 » 20 (2025) Employees' Net Promoter Score indicator

Impacts, risks and opportunities management

Policies related to own workforce (S1-1)

The Group has a strong focus on human rights, health and safety at work and diversity, equality and inclusion. Building a competitive advantage by creating diverse teams open to collaboration, dialogue and the exchange of ideas are important elements of the of the Strategy in the #TOGETHER pillar. By promoting an inclusive and safe working environment, we aim to improve employee wellbeing, prevent discrimination as well as health and safety risks.

**Table 135. Summary of key policies addressing employee issues**

Policy*	Description of policy content	The scope of the policy and its possible exclusions	The most senior level in the organisation responsible for implementation	Interaction with stakeholders
BNP Paribas Code of Conduct	The Code clarifies the responsibilities of all employees and managers in the spirit of the mission and values of the BNP Paribas Group.	Bank	Bank's Supervisory Board	The Group Code of Conduct is available on the Bank's website and each BNP Paribas Group employee is responsible for complying with it.
Physical Security Policy in BNP Paribas Bank Polska S.A.	The Policy is an integral part of the Security Management System in BNP Paribas Bank Polska S.A., defines the basic issues in the area of physical security and is the basis for the secure management of the Group's activities in the area of security of persons and its tangible and intangible assets.	Bank	Bank's Management Board	Internal document
Policy on dealing with breaches of respect for others	The purpose of the Policy is to build employee awareness of the Code of Conduct's principles of respect for others, to prevent violations and to detect them at the earliest possible stage. The Policy further defines the ways in which breaches are reported, how they are dealt with and the range of possible sanctions for the offenders. The procedure and form of actions taken at the Bank in relation to reported violations take into account the BNP Paribas Group guidelines, while ensuring compliance with local laws, in particular in scope of ensuring the impartiality of the persons carrying out these actions and the absence of conflicts of interest.	Bank	Bank's Management Board	Internal document
Whistleblowing Policy in BNP Paribas Bank Polska S.A. (Whistleblowing)	The Regulation provides a procedure for the Bank's internal notifications and aims to set out the principles, methods of reporting reasonable suspicions, without fear of retaliation following a breach notification. The whistleblower is guaranteed that the alert will be treated with the necessary seriousness, fairly and with full protection of personal data, as well as that of the person who is the subject of the alert, third parties indicated in the report of a breach, and other persons who appear in the content of the alert or during its analysis, e.g. the victim, witnesses of events.	Bank	Bank's Management Board	Internal document
Diversity management policy in BNP Paribas Bank Polska S.A.	The Policy sets out the Bank's rules of conduct for managing the risk of discrimination in terms of respect for diversity. The Policy takes into account the BNP Paribas Group's principles and the DEI strategic axes defined: professional equality between women and men regardless of gender; multiculturalism, diversity of origin; disability; age and intergenerational, sexual orientation and gender identity. The Policy defines the role of employee networks.	Bank	HR Executive Director	Internal document
Employee recruitment policy in BNP Paribas Bank Polska S.A.	Recruitment policy contains a description of the rules and regulations according to which recruitment processes are carried out in the Bank.	Bank	HR Executive Director	Internal document
Human Resources Management Policy	The Human Resources Management Policy is a set of principles and tools designed to ensure maximum support for the Bank's strategy by: <ul style="list-style-type: none"> ensuring an optimal workforce - attracting, retaining and motivating employees at the Bank and ensuring fairness and transparency in the Bank's people management policies. All tools and processes in the Human Resources Management Area are designed to maximise their objectivity (they are based on best market practices) and transparency - they are clear and widely known.	Bank	Bank's Management Board	Internal document



	The general principles and guidelines described in the Policy are the basis to which other policies and regulations of the Human Resources Management Area relate and on which further procedures and operational instructions are based.			
Remuneration policy for Employee of BNP Paribas Bank Polska S.A.	Ensure and define transparent and uniform remuneration principles according to which employees remuneration is awarded and paid.	Bank	Bank's Supervisory Board	Internal document
Remuneration policy for persons with a material impact on the risk profile of BNP Paribas Bank Polska S.A.	<p>In particular, it concerns:</p> <ul style="list-style-type: none"> the principles for the identification of persons in the Bank and in the Bank's subsidiaries that have a material impact on the risk profile and the principles of covering the Group's employees in the Policy, as well as for determining the basis (conditions) for obtaining variable remuneration and for acquiring the right to deferred variable remuneration; the principles for determining the components of variable remuneration of persons with a material impact on the risk profile and its payment. 	Bank	Bank's Supervisory Board	Internal document

* All employees are required to comply with the provisions of the policies.

Human rights

Social engagement

We respect a number of principles and standards that guide human rights business activities. These include in particular:

- The Ten Principles of the UN Global Compact,
- Sustainable Development Goals,
- UN Guiding Principles on Business and Human Rights,
- OECD Guidelines for Multinational Enterprises,
- Human Rights Standards as defined by the International Bill of Human Rights,
- Core Labour Standards as defined by the International Labour Organisation,
- BNP Paribas Group Code of Conduct,
- BNP Paribas Human Rights Declaration,
- BNP Paribas CSR Declaration for Suppliers,
- The Charter of Children's Rights in Business.

In 2012, the BNP Paribas Group signed the BNP Paribas Declaration on Human Rights, committing itself to ensuring that human rights are respected in its sphere of influence and covering employees, suppliers, Customers and local communities.

Our priority is to treat all employees and external partners fairly and to prevent discrimination of any type, in particular on the basis of age, gender, ethnicity, religion, nationality, political opinion, gender identity, sexual orientation, fitness level and others.

The Code of Conduct, which applies to all BNP Paribas Group subsidiaries, describes the importance of treating all employees with respect. The Code sets out the expected behaviour and attitudes of employees inside and outside the organisation. The Diversity Management Policy contains rules on how to deal with the risk of discrimination. It aims to create and promote a diverse working environment that utilises the potential of all employees. The Policy commits to following the adopted principles in all workplace management processes.

We do not tolerate any symptoms of mobbing or discrimination in the organisation. It allows the employer to prevent undesirable behaviour and to respond immediately if it occurs. The rules against this are regulated by: relevant policies and procedures (Table 135). Policies enable the employer to prevent undesirable behaviour and to respond immediately if it occurs. Employees - are provided with channels to report substantiated suspicions without fear of retaliation, whether they are experiencing or observing such behaviour. Reports are dealt with by a dedicated team, the modus operandi and remit of which are described in the relevant regulations.

Risks of modern slavery and human trafficking

The BNP Paribas Worldwide agreement on fundamental rights and global social framework provides that the Group recognises and confirms its commitment to a number of principles and standards, including the core conventions on forced labour, child labour and modern slavery.

Employee-related risks

The risk of modern slavery and human trafficking has been considered as low in the business activity because, to the best of our knowledge, no publicly available study has classified the banking sector and its employees, most of whom are highly



skilled professionals, as being particularly vulnerable to such practices. However, the Group is committed to providing a working environment in which all employees are treated fairly. In particular, the Group focuses on respect and the need to apply the strictest standards of professional behaviour and rejects all forms of discrimination.

While we consider the risk of human rights violations among Group employees to be very low, we provide a remedial mechanism, including whistleblowing channels and a mechanism for operating alerts related to these issues.

Occupational health and safety

All accidents at work are recorded in the accident register and in the RiskCare system. After each incident, an accident report is prepared with conclusions and preventive recommendations. In addition, once a year the Health and Safety Committee comprehensively analyses the Group's accident rates and, on the basis of these, implements measures to raise awareness of occupational safety.

In 2024, health and safety days were organised, focusing on the safety of drivers when travelling by car and safety rules for cycling and scooter driving. As part of World Heart Day, employees were reminded of what to do in the event of sudden cardiac arrest and a training session on pre-medical first aid was organised.

The Bank has regularly organised first aid training for willing employees since 2022. To date, a total of more than 1,200 employees have been trained (with 486 employees in 2024).

In addition, 18 employees of the Bank hold the title of paramedic. A refresher course in Qualified First Aid (KPP) was organised for this group in 2024.

An ordinance of the Minister of Health annually identifies areas at risk of increased radioactive concentrations of radon in the air. At the beginning of 2024, with the safety of the Bank's employees in mind, measurements were conducted in branches in these identified areas. Measurements are carried out using trace detectors, for a minimum of 30 days, and the aim is to determine whether the concentration of radon levels is within acceptable standards and may affect the health of employees.

In order to provide employees with a safe and comfortable workplace, the Group ensures compliance with health and safety regulations (enacted implementing acts such as, but not limited to: Occupational Risk Assessment, Rules for the provision of sight-correcting glasses or contact lenses to employees when working with screen monitors or Rules for carrying out health and safety inspections). It provides employees an ergonomic environment and a work-life balance. It organises compulsory initial and periodic training in the field of occupational health and safety and makes available to all willing employees training on work ergonomics in the form of e-learning on the MyDevelopment training platform. The aim of the training is, among other things, to prevent musculoskeletal disorders and injuries.

Office spaces are equipped with facilities for all employees, including those with disabilities, relaxation areas and modern spaces suitable for collaborative working. For people with disabilities, evaluations are developed to adapt the working environment to their needs, allowing for a personalised approach and the purchase of appropriate equipment.

The preventive activities of the Health and Safety Team prevent the occurrence of material negative impacts on employees. In addition, periodic health and safety campaigns are organised to promote issues relating to safe work and healthy lifestyles.

Given the nature of the Group's operations and the activities implemented, the real health and safety risks for the Group's employees are relatively low, with a very limited number of accidents (and occupational diseases). The main employee health risks that may be associated with possible accidents relate to psychosocial risks and sedentary lifestyles. These points are described in the section: [Material impacts, risks and opportunities and their interaction with strategy and business model \(SBM-3\)](#).

Diversity, equality and inclusion

The Bank promotes a working environment aimed at respecting and making the most of the potential of employee diversity to benefit the Bank's development. A guiding principle is the respect for co-workers - understood as applying best practices in professional relations, rejecting all forms of discrimination and providing employees with a safe workplace where each person can develop their potential.

The foundation of inclusive organisational culture activities is based on the values of transparency, courage, empowerment, simplicity and cooperation. These values are a kind of 'signpost' for strategic and operational decisions. Guidance on compliance with ethical and responsible business standards is provided by the BNP Paribas Group Code of Conduct. A campaign communicating the culture and our values entitled 'MOGĘ' received a total of 8 awards, including the 2024: Masters&Robots Awards and Internal Communication and Engagement Awards.

Diversity Policy in BNP Paribas Bank Polska S.A. sets out the rules of conduct for managing the risk of discrimination in terms of respect for diversity. The Policy takes into account the principles in force in the BNP Paribas Group as described in the 'Diversity, Equity and Inclusion Governance at BNP Paribas' and the DEI area strategic axes defined: professional equality between women and men regardless of gender; multiculturalism, diversity of origin; disability; age and intergenerational, sexual orientation and gender identity.

One of the key elements in building an inspiring and stimulating workplace is managing diversity and inclusion. Since 2016, the Bank is a signatory of and respects the principles of the Diversity Charter, an international initiative under the auspices of the European Commission that commits to prohibiting discrimination and promoting diversity. As a Bank, we have also signed the 'BNP Paribas Agreement on Fundamental Rights and Global Social Solutions together with the ILO (International Labour Organisation) Global Business and Disability Network Charter'. The document obligates us to respecting human rights in our business activities and promoting diversity, gender equality and protecting health and quality of life at work. The respect for diversity is overseen and coordinated by the person appointed to the dedicated position of Diversity and Inclusion Management as well as two functionaries - Diversity Officers in the Bank.

Our diversity activities are subject to external evaluation. In 2024, for the sixth consecutive year, we were among the leaders (score above 80%) in diversity management in the Diversity In Check survey (previous name D&I Rating) organised by the Responsible Business Forum.



We demonstrate respect for diversity and an inclusive organisational culture at all times - not only towards existing employees, but also towards candidates, in line with the Principles for the recruitment of employees in BNP Paribas Bank Polska S.A. as well as during the onboarding process. We actively support, including by a dedicated budget, bottom-up employee initiatives working for gender equality, equal parental rights, intergenerational dialogue for people 50+, with disabilities, neuroatypical, LGBT+ communities. We regularly conduct anti-discrimination activities and promote D&I (diversity&inclusion) standards in the workplace. We have developed an Equal Treatment Decalogue - 'See differences, don't discriminate'. - a set of rules against discrimination, micro-discrimination and exclusion in the workplace prepared on the basis of a survey examining perceptions of equal treatment. We organise cyclical events such as Diversity Days, Health Days, Health starts with the head, Parents' Week.

Commitment to fair and equal treatment of candidates during the recruitment process and professional assessments (assessment centre/nominations)

The Bank recognises its employees as a key factor in achieving success. A strategic and professional approach to recruitment and selection enables the Bank to attract and hire employees with the necessary skills and qualities to achieve the Bank's strategic objectives and enhance its value.

All recruitment decisions are made only on the basis of objective and job-related criteria. The recruitment and selection process is based on clearly developed job descriptions and the competence requirements defined for each position. One of the main principles of the recruitment policy is that efforts are made to fill positions based on an internal recruitment process, especially for managerial positions.

Candidate selection criteria are clearly defined and transparently communicated, and the selection of a candidate is based on an objective process of assessing the required competences while respecting diversity.

Group subsidiaries ensure that no discriminatory criteria are included in job offers. This applies to both internal and external offers. They also take care to ensure that titles and terms are used to allow both women and men to apply, without any limitation. These principles apply to all types of contracts.

Implementation of policies for incidents of discrimination, mobbing and harassment, including sexual harassment

One of the elements of the Group's Employee Code of Conduct is respect for others. Respect is a key element in preventing mobbing and discrimination in the workplace. Respect means treating other employees with dignity and appreciation. Respect for diversity and individual characteristics of employees helps to create an environment free of discrimination. A culture based on respect promotes equality and fairness, which in turn reduces the risk of mobbing or discrimination. Employees feel integrated and motivated to work together. Respect in interpersonal relationships promotes better communication and understanding, which helps to resolve conflicts before they escalate into mobbing and discrimination.

The Bank has a Policy for dealing with violations of respect for others. This document contains rules for the reporting of undesirable behaviour, the way to explain them, the applicable deadlines for dealing with reports, as well as the post-incident follow-up. The applicable rules in the Policy ensure confidentiality and non-retaliation for those reporting and participating in the investigation.

As an employer, the Bank recognises discrimination, mobbing, harassment, including sexual harassment as undesirable occurrences. All internal employment and employee regulations comply with the applicable legislation, in particular with regard to the prohibition of unequal treatment. The prevention of undesirable events includes, mainly, regular informative, educational, organisational, preventive and follow-up actions following the identification of undesirable activities. In carrying out this obligation, the Bank organises appropriate training to spread awareness of what behaviours are inappropriate and explaining why they are unacceptable in the workplace. As part of the 'BNP Paribas Group Code of Conduct', descriptions of good practices are promoted, which include examples of behaviour expected of employees that do not amount to discrimination or mobbing of others.

These measures are intended to effectively prevent the occurrence in the workplace of behaviours that bear the characteristics of discrimination and mobbing in employment.

Additional internal regulations against discrimination (in addition to the policies listed in Table 135):

- BNP Paribas Bank Polska S.A. Work Regulations
- Regulations of the Disciplinary Committee and rules of disciplinary proceedings in BNP Paribas Bank Polska S.A.

Processes for engaging with own workforce and workers representatives about impacts (S1-2)

Engaging with stakeholders who are influenced by and affect our organization plays a key role in the due diligence process and in assessing the relevance of our sustainability efforts. We are committed to an ongoing, open dialogue with our stakeholders. This applies both to our day-to-day operations and to the processes involved in identifying and assessing impacts, opportunities and actual or potential risks.

As part of its due diligence process, BNP Paribas Bank Polska, with its employees and their representatives engage on important issues that affect or may affect them. This dialogue with employees is based on several tools, a description and quality assessment of which can be found in the 'Interests and views of stakeholders (SBM-2)' section of this report.

This dialogue is overseen by the Bank's Management Board, which is responsible for managing significant impact, risks and opportunities. Managers are responsible for ensuring employee engagement. The Organisational Culture Team (in collaboration in the interdisciplinary Employee Voice Team) coordinates the collection of employees' opinions. Managers also have access to results of their teams' weekly surveys (pulse type "Friday 6").

The engagement of employees is assessed by analysing employee surveys and feedback, which is discussed by managers, HR Business Partners and the Management Board.

In 2018, BNP Paribas and UNI Global Union concluded an 'International Agreement' on 7 areas of core labour rights, which established a framework for social behaviour and covered all BNP Paribas Group employees. The implementation of such an agreement was the result of efforts by the HR teams of BNP Paribas' key global entities and the outcome of negotiations with trade unions. It is also the culmination of a long tradition of social dialogue within the Group on a European level, as reflected in the previous signing of three European agreements (Employment Management, Gender Equality, Prevention of



Stress at Work). At the end of 2024, the Agreement was renewed and it is valid from 1 December 2024 for a period of 4 years.

Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

All Group employees are required to comply with the law and the standards set out in the BNP Paribas Group Code of Conduct.

Channels for reporting violations and handling employee issues

In our activity, we are motivated by ethical standards and values, which include in particular: honesty, openness, mutual trust, responsibility, transparency, professionalism and respect. This applies to all activities of the Group, whatever their nature, referring to all persons representing or cooperating with the Bank. An important element in supporting this process is to enable the reporting of suspected violations without fear of retaliation against the whistleblower.

Employees who have experienced disrespect towards themselves or others should contact their manager or HR Business Partner in the first instance regarding this matter. If this is not possible for various reasons, they can also use other channels of reporting (as described in Policy on dealing with violations of respect for Others in BNP Paribas Bank Polska S.A.).

Whistleblowing can also be reported through the communication channels listed in the Whistleblowing Policy at BNP Paribas Bank Polska S.A. and are then dealt with in accordance with the standards set out in this regulation.

Grievance mechanisms

The manner and form of action taken in the Bank in relation to reported cases of breaches takes into account the BNP Paribas Group policy guidelines, while ensuring compliance with local laws, in particular with regard to ensuring the impartiality of the persons conducting these actions and the absence of conflicts of interest.

The principles of mutual respect must inspire the decisions and actions of employees. To ensure that everyone has the opportunity to work in a supportive environment, it is important that each employee ensures that they adhere to the highest standards of professional ethics and that they can safely raise their concerns about the behaviour of colleagues. We promptly take action and provide support to affected persons guided by a sense of responsibility and a concern to protect the health and safety of employees.

Whenever irregularities are found, regardless of the level of the position of the offender, it will result in a decision to apply disciplinary measures appropriate to the situation. At the same time, recommendations are made, the implementation of which is monitored.

All notifications are reviewed by the Employee Relations Team, while cases involving behaviour that may indicate the presence of bullying, discrimination, harassment or sexual harassment are referred to the Employee Standards of Conduct Committee for consideration.

The notification shall contain a description of the facts, including an indication of the specific conduct or actions that the notifier believes to have occurred, and, to the extent possible, evidence supporting, in the opinion of the notifier, the occurrence of the conduct or events referred to, together with the name of the suspected offender.

Notifiers are guaranteed that the report will be treated with due seriousness, fairness, honesty and discretion. The principle of the presumption of innocence is applied to persons charged in a report.

No form of retaliation will be tolerated against the notifier for having made a report in good faith, or against anyone involved in the investigation of the report.

Employee effectiveness and trust assessment

Controls

A dedicated HR Compliance Team conducts periodic controls to verify and evaluate the accessibility to information, reporting channels and the process of analysing and handling cases. Second Level controls are carried out by an independent team to assess the effectiveness of the implementation of the whistleblowing system

Reporting

Confirmed violations subject to investigation are reported collectively to the Bank's Ethics and Standards of Conduct Committee. Indicators relating to violations are furthermore monitored quarterly in the Bank's internal management data analysis systems.

Code of Conduct, Diversity and Inclusion survey

In 2023, the Group conducted a survey among all employees for the second time, including those with a form of employment other than a contract of employment, the Code of Conduct and Diversity and Inclusion (the survey is conducted every 2 years). Around 90% of respondents reacted positively to questions related to knowledge and application of the Code of Conduct. 95% of respondents know the channels for reporting misconduct. 85% believe that we respond appropriately to reported misbehaviour and 86% confirm the application of the Code of Conduct by managers.

Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)

The Bank implements various measures to prevent, mitigate and correct adverse effects on employees and to manage significant risks and opportunities.

The Bank implements measures to promote an inclusive culture and prevent discrimination. Policy on dealing with breaches of respect for others at BNP Paribas Bank Polska is based on awareness-raising activities, training and whistleblowing to prevent and deal with incidents of discrimination, mobbing and harassment in the workplace.



We implement measures to improve the mental and physical health protection of employees through an extensive benefit offer and a wellbeing programme called 'DOBRZE'.

In addition, psychological support programmes and mental health training are implemented to detect and address material and psychosocial risks. Also, we ensure good and flexible working conditions for our employees.

We promote work-life balance. We also encourage employee volunteering (more in the POSITIVE Pillar, [BNP Paribas Foundation](#) section).

A diverse and inclusive workplace

Preventing and mitigating the negative impact of exclusion and the risk of litigation related to discrimination and unfair treatment

At the Bank, we have been consistently building an inclusive organisational culture that enhances creativity, drives innovation, is open to new ideas, markets, customers, thus building a business advantage and thus contributing to the development of employees and the success of the entire organisation. Everyday cooperation is based on trust and respect - we want everyone in the Bank to be able to express themselves, realise their career aspirations and passions, feel valued and have a sense of influence.

Remedial action and effectiveness monitoring

Regular employee opinion surveys on the Code of Conduct and Diversity & Inclusion (Code of Conduct & Diversity & Inclusion survey conducted every two years across the BNP Paribas Group) confirm that we are successfully creating an inclusive work environment. In the latest edition of the survey, conducted in October 2023 among Bank employees, 92% of respondents believe they can be themselves and feel accepted. 88% believe that everyone has the chance to develop in our organisation regardless of ethnicity, and 80% believe that they have the same career development opportunities as their colleagues.

An important role in strengthening an inclusive organisational culture based on values and respect is played by grassroots employee networks that aim to work on behalf of people from groups potentially at risk of unequal treatment. Working closely with the networks, the Bank undertakes a number of activities open to all employees to promote diversity and inclusivity in the workplace. In 2024, it organised four educational and awareness-raising events (educational campaigns, series of meetings, webinars and workshops):

- Health starts with the head (mental health education),
- Diversity Days – education about inclusive communication as a foundation for good collaboration, visual impairment and the role of technological support, neuroatypicality in children,
- Health Days – educational events on health topics, stationary activities related to vision prevention, VR relaxation sessions, reflexology sessions and massages;

- Parenting Days, during which awareness was built in the area of children's neurodivergency;

In the past year, the Bank was also involved in promoting diversity and inclusion through its participation in the development and promotion of the report by the DEI Committee of the Polish Bank Association 'Diversity Management in Commercial Banks'.

Respect for people: preventing discrimination, harassment and violence in the workplace

Preventing and mitigating material negative impacts and risks of discrimination and violence in the workplace

Activities that serve to raise awareness of violations and prepare for their effective detection and response to avoid their escalation include:

- Regular reminders of the rules adopted in this area, the types of behavior covered by them, along with specific examples;
- Indicating channels for reporting breaches;
- Emphasizing the importance of employees reporting any situation of concern, witnessing if asked to do so as part of an investigation, and ensuring that they are protected in connection with the situation.

Managers must be particularly aware of their obligations under the Code of Conduct to respect others, which are:

- leading by example and complying with the highest ethical standards,
- creating an environment of open and honest communication,
- encouraging discussion of ethics and integrity in business decisions,
- regularly supporting employees and encouraging them to raise any concerns without fear of possible negative consequences.

Steps in the breach notification process

All employees, especially those in managerial positions and those working in the HR Area, must be sensitive and vigilant to any professional situation that may lead to inappropriate behavior relating to the Code of Conduct regarding respect for others. All reports are analyzed with the necessary seriousness, integrity, fairness and discretion.

Steps in the breach notification process

- Reporting breaches - An employee who believes that he or she or another employee has experienced a violation may make a report through the reporting channels available in the Policy on dealing with violations of respect for Others in BNP Paribas Bank Polska S.A.
- Preliminary analysis conducted by a dedicated team - on its basis, a decision is made regarding further consideration of the report and the mode in which it will be carried out, or its abandonment due to inconsistencies in the information provided.



- Investigation - individual interviews are conducted with the persons involved, i.e. the reporting person, potential offender and witnesses, as well as analysis of the documentation relating to the employment of those under investigation.
- Analysis of materials and findings made during the investigation.
- Final document - preparation of a document containing the findings made and recommendations for further action in the case under consideration by the leading team.
- Issue recommendations and monitor their implementation.

Sanctions

If the investigation identifies inappropriate behavior or situations which require action, appropriate measures are taken against all those who require it, including disciplinary measures. The decision on sanctions is made by the Disciplinary Committee based on the Labor Code and internal regulations, and depends on the degree of violation of employee duties.

Remedial actions and effectiveness monitoring

- The injured person receives support from HR's superiors and supervisors. Appropriate medical, psychological and social support is also provided. Guided by a sense of responsibility and concern for protecting the health and safety of employees, measures are also taken to prevent the reoccurrence of similar situations in the future.
- In 2024, 17 reports were investigated in the Bank, including the establishment of the Employee Standards of Conduct Committee twice because of the severity of the allegations which were made.
- Those responsible for inappropriate behaviour suffered consequences appropriate to the misconduct, and those affected received the necessary support.

Social protection benefits

Prevent and minimize potential negative impacts on social protection

As part of the Lux Med health care program, we provide employees (those employed at least 0.3 FTE) with a medical care package. Under a contract with Lux Med, employees can choose from several packages with different type of services.

The Bank's benefit offers include:

- Employee Capital Plans, life and accident insurance for employees and their relatives (also for part-time and temporary employees), additional insurance for school-age children, discounts on travel insurance and third-party liability/AC automobile insurance, additional insurance - oncology and cardiology packages, holiday subsidies for the employee and holiday subsidies for the employee's children from the Company Social Benefits Fund, financial assistance from the Company Social Benefits Fund (also for part-time and temporary employees), housing loans from the Company Social Benefits Fund;

- Lux Med healthcare program for employees and their relatives (also for part-time and temporary employees), MultiSport Plus cards (employee, companion, Kids, Kids Aqua, Student, Senior), Worksmile application, which brings employees together around their passions and sports activities (also for part-time and temporary employees), Health Days for all Bank employees, during which we promote a healthy lifestyle - movement and healthy eating (webinars on healthy eating, stationary events: body composition analysis, relaxation sessions, office exercises). healthy eating, stationary events: body composition analysis, relaxation sessions, exercises in the office), flu vaccinations, vouchers for preventive examinations: cancer prevention and mental well-being.

Actions taken and planned

The Bank has implemented a number of initiatives and measures to improve the welfare and social protection of its employees. It also monitors indicators of maternity, paternity and parental leave usage, among others, on an ongoing basis. In 2024, together with representatives of the company's trade unions, we agreed on amendments to the Company Collective Bargaining Agreement for employees of BNP Paribas Bank Polska SA. Accordingly, among the changes taking effect on January 1, 2025 were the rights to benefit from:

- leave of up to 2 weeks - under the rules corresponding to the so-called paternity leave (no longer than until the child is 12 months old) - by an employee (regardless of gender) who does not have parental authority, but who has actual care of the child,
- days of so-called special leave, due in situations such as, among others, the birth of a child, the marriage of a child, the need to provide care for a child under 14 years of age, by an employee in an informal relationship (regardless of gender) and by an employee who does not have parental authority, but who has actual care of the child,
- an additional day off for job search in the case of termination for reasons not related to the employee.

Remedial action and effectiveness monitoring

The Bank periodically examines both the needs and wellbeing of employees through employee opinion surveys on benefit and wellbeing offerings. The information collected allows us to tailor activities and solutions to specific needs. A survey of benefit offerings and wellbeing programme 'DOBRZE' was conducted in the second quarter of 2024, which allowed the Bank to formulate action plans and strategic directions for employee needs in these areas and their ongoing adaptation.

Psychosocial risk detection and remedial actions

Concern for the mental and physical health of employees

Programme 'DOBRZE'

The Bank actively influences the well-being of working people by shaping a work environment that supports both their well-being and their business efficiency. We take care of employees' mental and physical health (including protecting and counteracting the physical and psychological effects of stress at work), implement flexible work methods and organize work in such a way as to prevent overload and enhance efficiency. We create a work environment that supports wellbeing by:



- Periodic survey and ongoing monitoring of employee well-being, and based on the data collected, take measures to affect the work environment and promote well-being,
- providing mental and physical health education by running a wellbeing program, which includes workshops and training on healthy lifestyles, stress management, job burnout, physical health and mental health, among others,
- providing ongoing psychological support, which includes access to specialists and therapists, a psychological support and burnout hotline, as well as programs to support employees in managing stress or other mental health issues,
- encouraging employees to engage in physical activity to maintain physical fitness and improve overall well-being and well-being,
- promoting healthy lifestyles and encouraging employees to take care of their health.

Annual health initiatives:

- ‘Health starts in the head’ - An event where we promote and build awareness of how to care for and strengthen mental resilience,
- ‘Health Days’ - an event during which we promote and encourage employees to take care of preventive health by offering educational activities (webinars), physical sessions to reduce stress, and vouchers for additional preventive examinations.

Actions taken and planned

The Bank's employees are offered attractive benefits and participation in initiatives that allow them to take care of their health, develop their sports skills and pursue their passions. We have designed our benefits offer in such a way that employees' relatives can also take advantage of them. Their large number and wide range allow us to tailor benefits to the individual needs of each person.

Process of action identification to prevent material risks

Managers play a key role in preventing psychosocial risks by detecting their manifestations and taking appropriate action. They have the opportunity to observe certain unusual or disturbing signs and changes in employees' attitudes or behavior. Therefore, the Bank organizes educational activities (webinars, e-learning training) for managers and provides educational materials on the mental health crisis, manifestations of burnout, working with people with disabilities, with neuroatypical people. It has also provided special psychological support channels for managers (with a focus on the specifics of leadership roles in difficult and crisis situations) in 2024.

Remedial actions

Remedial actions focus on analyzing manifestations of psychosocial risks and implementing appropriate measures to address identified problems. Analysis of the voice of employees, provided through open-ended comments in engagement surveys and cyclical questionnaires, makes it possible to respond on an ongoing basis to the issues raised.

Monitoring and evaluating effectiveness

The Bank provides managers with real-time information about the team through dashboards of defined HR risk indicators (including absenteeism, leave utilization, overtime, turnover), as well as analysis and summaries with the results of the cyclical Pulse Check engagement survey and weekly Friday 6 satisfaction surveys. This allows managers to react in real time to alarming developments indicating a potential decline in employee feelings.

Professional equality actions

Actions on taking advantage of gender diversity opportunities

We focus on a culture of courage, agency and diversity as a basis for fostering efficiency and creativity. In close collaboration with grassroots employee networks, the Bank is undertaking a range of activities in various areas of diversity and inclusion. In 2024, the Bank had as many as six networks: women's 'Kobiety Zmieniające BNP Paribas, fathers' 'Tato, masz to jak w banku', 'BNP Paribas Pride Poland' supporting LGBT+ communities, 'Wiek Agawy' advocating for the 50+ community and intergenerational dialogue, 'OZNacza Mogę' embracing people with disabilities and 'Neuronauci' focusing its activities on neurodivergent people. Together, we have undertaken numerous D&I activities.

Gender equality initiatives to promote equal opportunities for women and men

- reducing the pay gap between women and men. We are levelling the opportunities for promotion and participation in talent programmes and setting specific targets for equal participation of women at all levels of the organisation's positions,
- ‘Just a word’ marketing campaign, promoting feminatives, the use of which helps fight stereotypes and promotes equal opportunities between the sexes,
- partnership with the Share the Care Foundation, projects: ‘Equal at home, equal at work’, ‘Proud to be a working mum,’ ‘Guy at 100 pro’.
- partnership in the #KnowNotMaGender campaign, which aims to demonstrate the importance of empowering women in public debate and reducing disparities in the presence of female experts in the media,
- partnership in the programs ‘Success Is Me’, ‘What About This Cash’, Businesswoman of the Year of the Sukces Pisany Szminką Foundation,
- support for the initiatives of 30% Club Poland, #JamaisSansElles, Champions of Change Club,
- partnership in Women in IT Day Future Collars events,
- proprietary development programs BNP Paribas' Women of Change network: Women UP programme and Future UP (finalist in the ‘Super M’ mentoring programs in the Business category in 2024).



Parenting initiatives

- Parents' Days is a cyclical event during which children get to know their parents' workplace and participate in a variety of workshops promoting values important to the Bank, linked to the Sustainable Development Goals, and employees can improve their parenting skills during webinars, workshops, meetings with expert speakers. Discussed topics include the dangers and protection of children online, support for neuroatypical children, new technologies, environmental protection, and first aid;
- partnership with the Share the Care Foundation, which is dedicated to promoting the equality of the right of both parents to care for their child and building committed fatherhood;
- parenting consultations (parenting support) available through the wellbeing 'DOBRZE' programme.

Initiatives to promote equal opportunities for people with disabilities

- 'Different capabilities, common goal' educational campaign and specially prepared space on the intranet,
- 'People with experience' video-interview series presenting interviews with employees who face the challenge of disability or health issues and want to share this experience with the banking community,
- awareness education: webinar on visual impairment, online darkness workshop,
- e-learning training for managers and employees with disabilities,
- a savoir-vivre guide to people with disabilities,
- support for people with disabilities in obtaining a disability certificate,
- a dedicated job position for inclusion of people with disabilities and a dedicated job position in the recruiting team,
- the Incluision partnership of the Activation Foundation, which aims to facilitate the entry of people with disabilities into the Polish labor market. The Bank is the main partner of the 2nd Inclu(vi)sion Congress, and co-organizer of a virtual job fair for people with disabilities,

Initiatives to promote equal opportunities for neuroatypical individuals

- Awareness campaign on neurodiversity 'A different look at a different look' (webinars, educational materials, specially prepared space on the intranet),
- testimonial from the 'People with Experience' series on neurodiversity - the story of a person on the ADHD spectrum and his cooperation with a manager,
- a guide for managers on how to work well with people on the autism spectrum and ADHD prepared by the Neuronaut community,
- educational webinar on the ADHD spectrum,

- educational activities (webinars, workshops) for parents and caregivers of neuroatypical children, a neuro zone during the children's banking event,
- cooperation with the AsperIT Foundation - awareness campaign, webinars and audit of the readiness of the organization to work with neuroatypical people and implementation of recommendations.

Initiatives to support the LGBT+ community

- celebrating Pride Day in the Bank's Warsaw headquarters combined with a screening of the film 'Lesson of Tolerance', as well as support for the Campaign Against Homophobia,
- continuation of the series of educational activities on the topic of transgenderism - a webinar with a transgender person about their challenges in personal and professional life,
- preparation of a guide on serving non-heteronormative/LGBT+ people as Bank customers,
- participation in the Love Doesn't Exclude association's 'Business Doesn't Exclude - Here You Can Be Yourself' campaign, establishing cooperation with the Rainbow After the Storm Foundation, which offers psychological support for people from the LGBT+ community, and partnering in the All Inclusive Festival event (Sailor Cinema Foundation).

Initiatives to support age diversity

- In response to the needs revealed by the survey of 50+ employees, as well as the experience of managers in the area of managing multigenerational teams, Agave Age network initiated an original development project 'Intergenerational Tandem', which received the main award in the Age category in the Polish Diversity Awards 2024 competition,
- education on the topics of diversity and inclusiveness in the area of age diversity, education on menopause and a series of development webinars 'Catch my way',
- participation in the Diversity Charter Team project (Forum for Responsible Business) in a series of workgroup thematic meetings, bringing together representatives of business and the NGO sector around the broad topic of challenges related to demographic change and the situation of people 50+. In 2024, the material "People 50+ in the labor market - thematic analysis" was published as a summary of these meetings.

Remedial actions and effectiveness monitoring

The Bank is paying very close attention to the real implementation of diversity, including ensuring adequate participation of women in the Bank's bodies. As of 31 December 2024, the share of women on the Supervisory Board was 45%, while the share of women on the Bank's Management Board was 37.5%. Compliance with the principle of diversity is monitored not only at the level of the Bank's bodies, but also at the level of managerial positions.

Social engagement

The employee volunteer programme under the slogan 'You can rely on me' has been running since 2011. Activities described in detail in the POSITIVE Pillar, in the section: [BNP Paribas Foundation](#). At the same time, employees' social



activities are part of the BNP Paribas Group's international #1MillionHours2Help initiative, coordinated in Poland by the BNP Paribas Foundation.

All of those actions are opportunities to promote well-being at work, engage employees and retain them in the Group.

Employees development

Action intended to take advantage of important skills development opportunities

We are creating a competent organization that is ready to effectively execute business strategy and build long-term value in the market. We invest in the competence of leaders, talents, experts and employees by addressing skill needs. We strive to be an attractive place of development for every employee.

An important pillar in the development policy is the development of effective leadership and support for leaders, in accordance with the BNP Paribas LeaderUP leadership competency model. Competent leaders are the driving force behind the development of the organization. The competency model promotes behaviors and skills that enable us to achieve high business results while taking care of a friendly work environment. Leaders are supported through a variety of development activities, including webinars, workshops, individual consultations. Self-assessment and 360 assessment of leadership competencies are conducted periodically so that leaders can accurately reach out for support that is adequate for them. The Bank also offers a Leader Development Academy (NewBorn Leaders) - a programme dedicated to those entering the managerial path. 'Stronger Together' events dedicated to senior management are also held periodically.

Creating a continuous development culture

To provide the organization with competent employees, and to be prepared for the coming challenges, a culture of so-called lifelong learning is essential. It is promoted through re-skilling and up-skilling programs, but also through the mechanism of individual responsibility of employees for their development presents in the Group. We develop of so-called Individual Development Plans and ensure that each employee is aware to what extent and in what time he/she needs to improve his/her competencies or acquire new ones.

At the same time, the Bank provides access to rich and thematically diverse training courses and webinars. In addition to mandatory job-related training, which we provide primarily in the form of e-learning, we offer a wide package of individual training courses and the possibility of subsidizing language learning or studies.

In 2024, as part of development activities, our employees filled 24,547 seats in various types of training groups.

In addition, we are open to people who are just choosing their career path. We direct the Bank's summer internship programme to students in at least their second year of study.

For employees who are leaving the Bank, we offer programs to help them find their way on the labor market: an outplacement programme offering support in finding a job, defining a professional profile, assistance in preparing a resume, preparing for a job interview.

Other training initiatives in 2024 in the Bank include:

- re- and up-skilling programs: 2nd Lean Green Belt and UX Academy, Innovative Thinking (for the Risk Area),
- Digital Academy - a long-term up-skilling programme focused on developing knowledge and skills for working with AI - 644 participants, 18 topics in 28 training sessions were implemented in 2024. 761 participants benefited from the AI knowledge library (e-learning training, videos, ebooks),
- a series of workshops - Value Meetings - for nearly 4,000 employees, including managers, resulting in, among other things, action plans for improving the quality of the application of values in daily work,
- within the framework of #MyWay - 4,694 participants, 99 topics were implemented in 270 sessions,
- within the framework of #MamToDamTo - 1,883 participants, 34 topics in 150 sessions were implemented,
- UniversITy - IT training in modern technologies - 1,364 participants, 43 topics in 75 sessions were implemented,
- Women Up development programme - 85 participants, Future UP mentoring programme - 166 people, within the 'Women Changing BNP Paribas' employee network.

In 2024, the local edition of Career Days at BNP Paribas Bank Polska S.A. was conducted under the slogan 'Festival of New Opportunities: The AI revolution and our professional future'. It was an opportunity for all employees to learn about AI and the possibilities of using new technologies in everyday life. Becoming aware of the amount and speed of changes happening in our environment using AI was also a good motivator for employees to plan their own development and take advantage of career-changing opportunities. In total, these five events brought together more than 800 participants.

One of the key target groups for investments in competencies are Talents who are ambassadors of change and innovation. In the 2024, we launched development activities for our employees and leaders identified as high potential. Those identified as 'Leaders for Tomorrow' participate in the international training offer prepared by BNP Paribas' EM Talent Development. And for Emerging Talents participants, we launched a dedicated 10-month local development programme.

Trainings: ESG Academy

The ESG Academy is a seven-month educational programme aimed at strengthening sustainability knowledge and skills to work effectively to implement GO beyond's strategy and contribute to the Sustainable Development Goals. In 2024, 160 Group employees joined the Sustainability Community to participate in the second edition of the ESG Academy.

The ESG Academy's goals:

- AWARENESS - building awareness of trends and ongoing social, economic and environmental changes,
- KNOWLEDGE - to provide knowledge of the basic concepts, regulations, standards for sustainable development activities,
- SKILLS - equipping with skills to implement new ESG initiatives,



- ATTITUDES - inspiring discussion, promotion of ESG, and commitment to the sustainability of the Bank and Customers.

In line with the #POSITIVE pillar of the strategy, the Bank's goal is to remain a leader in sustainable finance and a partner in supporting the sustainable development of the economy. Joining the Sustainability Community offers the chance to gain a deeper understanding of current challenges and to translate the knowledge gained into practical action for change in the organisation and the environment. Sustainability Officers initiate and implement sustainability activities in individual areas and business lines.

Workplace development

The AboutMe platform, which serves employees, managers and HR in managing career paths, aims to:

- declaring skills by employees, through which a range of programmes, training and resources are built to support professional development. In 2024, 5,827 i.e. 80.6% of employees (of which about 64% are women) declared their skills on their profile in AboutMe,
- supporting employees in their development and professional improvement,
- improving interaction between employees, managers and HR, facilitating internal mobility as well,
- conducting an annual professional evaluation process.

Internal mobility: the system of career paths and internal mobility is an important mechanism for influencing the positive experience of people working in the Bank. An important element of the career paths mechanism is the diagnosis of individual resources, predispositions and talents, which allows easier decision-making about further professional development and setting goals in this regard in the short and long term. Employees are supported in this regard by the Bank's delivery of development tools and activities to identify these predispositions and build a career path on them. The Bank offers solutions taking into account the fact that employees' needs and expectations change over time and are redefined along with their professional development and personal life changes.

The Bank offers career paths for different positions and specializations, which allow employees to plan their professional development in a thoughtful manner and in line with their aspirations. At the same time, the Bank aims to combine the needs of the organization and the needs of employees. Key competencies are identified for the organization as a whole from the perspective of the Bank's strategy, as well as for individual business areas, in order to ultimately prepare employees through upskill programmes for the professions of the future. As a result, opportunities are created for people working in the Bank to shape their career paths in accordance with market trends, the requirements forced by technological developments and the changing business environment.

Resources allocated to manage material impact

The role of the Human Resources Management Area is to support managers in managing the Bank's human potential and building the Bank's image as an employer.

The HR strategy focuses on attracting and retaining the "best" employees, building strong and long-lasting relationships with these employees through a fair offer that takes into account solid opportunities for self-development, and matching the employee's individual needs and ambitions with the Bank's needs and goals.

The HR strategy is also based on the Bank's core values: transparency, courage, empowerment, simplicity and cooperation. These values influence employee behaviour. The sum of employee and managerial behaviour creates the organization's culture that enables the Bank to achieve and maintain a competitive advantage and realize its planned growth.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

Our key target is to continually build an organization that is an exceptional place to work attracting the best candidates from the labour market, as well as nurturing motivation and efficiency among existing employees. Only committed and effective employees, managed by exceptional leaders, acting in the spirit of agile and in accordance with the values of the organizational culture will allow us to ensure market success.

We want to achieve this through the continuous development of leadership competencies as well as future competencies among our employees, allowing them to find their way and continuously develop in today's digital and changing times. A high standard of leadership and qualified employees with core competencies and the values of the organization are the basis for us to create an exceptional workplace. All of this, supported by efficient and digitized HR processes, attractive employee offerings and development opportunities, gives a complete picture of the organization we are building.

We make sure that strategic targets are consistent with team or individual targets. That's why we start the target-setting process with the approval of business targets by the Supervisory Board for the Management Board. We practice cascading, that is, translating strategic targets into targets for individual structures, and at a later stage, during meetings between supervisors and employees, into targets for individuals.

HR's main target in managing the employee experience is to create a work environment in which every working person feels listened to, valued and has a real impact on shaping the Bank's organizational culture and processes. This approach allows us to act comprehensively and focus on all aspects of employees' working lives, from recruitment to termination. The measures taken are aimed at increasing employee engagement and job satisfaction.

Employees experience management is implemented within the framework of the following dimensions:

- Building a culture of openness, trust and respect - creating an atmosphere where working people can be themselves, feel safe sharing their opinions, ideas and concerns, and promoting the value of open communication as a key success of the organization.
- Integrating the employee voice in strategic decisions - implementing solutions to systematically incorporate the employee experience into organizational strategy and key decision-making.



- Stimulating innovation and continuous improvement - using employee feedback to identify areas for improvement and implementing innovative solutions.
- Increasing employee engagement and satisfaction at every level of employment - regularly monitoring engagement and satisfaction levels and taking measures to increase them.

The above dimensions translate into specific actions:

- Defining, describing and measuring specific employee experiences to create satisfying and engaging experience at every stage of employment.
- Conducting regular employee satisfaction and engagement surveys, the results of which are systematically analysed, and as a result, key trends and areas for improvement are identified.
- Investigating current sentiments and moods in weekly surveys to be able to react in real time when the need arises.
- Strengthening the feedback culture by promoting ongoing feedback.
- Enabling employee voice through surveys on issues that are strategically important to the Bank.

Our commitments to a diverse and inclusive workplace (D&I):

- at least 30% participation of women in management positions by 2025,
- reducing the adjusted pay gap - the Bank's strategic goal is to reduce the adjusted pay gap to less than 4% by 2025,
- increasing employment of people with disabilities,
- monitoring of indicators relevant to D&I management, including, among others, the share of women vs. men in specific initiatives, use of parental leave, retention rate by gender,
- BNP Paribas Group's cyclical survey on the Code of Conduct and diversity and inclusion,
- support for grassroots employee initiatives for groups at risk of exclusion.

Table 136. Strategic indicators on social responsibility

Pillar	Strategic indicator	Target 2025	2024
Social responsibility	Participation of women on the Bank's Management Board [vs 2021: 22%]	30%	37.5%
	Reduction of the adjusted pay gap between women and men [vs 2021: 7.3%]	<4%	3.8%
	eNPS - Net Promoter Score of employees [vs 2021: -9]	20	27

Characteristics of the undertaking's employees (S1-6)

The tables below include all active employees of the Group hired into a fixed-term contract of employment (FTC) or a permanent contract of employment (PTC) in the Bank or one of the subsidiaries. The following data does not include employees employed in technical positions, i.e. those employed at 0.05 and 0.063 FTE. Employees working in a minimum of two companies are counted once. Tables include data as of 31.12.2024.

Table 137..Employment by gender in (as of 31 December 2024)

Gender	2024	
	Number of employees	Number of FTEs
Women	4,778	4,761
Men	2,734	2,717
Total	7,512	7,478

active employees without technical and duplicate positions within the Group

At the end of 2024 64% of the Group's employees are women and 36% are men. All Group employees are employed in Poland.

Table 138..Employees by contract type, broken down by gender (as of 31 December 2024)

Form of employment	2024		
	women	men	total
Total employees			
Number of employees	4,778	2,734	7,512
Number of full-time positions	4,761	2,717	7,478
Permanent employees			
Number of employees	4,185	2,418	6,603
Number of FTEs	4,172	2,403	6,575
Fixed-term employees			
Number of employees	593	316	909
Number of FTEs	589	314	903

active employees without technical and duplicate positions within the Group

The vast majority of employees are employed on permanent contracts (almost 88%).

**Table 139..Employees by working time, broken down by gender (headcount) (as of 31 December 2024)**

Type of contract	2024		total
	women	men	
Total persons employed			
Full-time contract	4,719	2,696	7,415
Part-time contract	59	38	97

active employees excluding technical and duplicate positions within the Group

In 2024, 97 employees were hired in part-time (1% of the Group's workforce).

Table 140. Leavers in 2024

	2024		total
	women	men	
Total number of leavers	759	378	1,137
Voluntary leavers, including retirements and others	472	258	730
Dismissal	287	120	407

active employees excluding technical positions and duplicates within the Group

Table 141. Turn-over in 2024

	2024		total
	women	men	
Turn-over by employees	14.4%	13.6%	14.1%
Turn-over by FTEs	14.4%	13.6%	14.1%
Voluntary turn-over by employees	8.9%	9.3%	9.0%
Voluntary turn-over by FTEs	8.9%	9.3%	9.0%

All Group employees excluding technical positions

Turn-over in the table above calculated as the number of people leaving excluding technical positions to the Group's average annual headcount.

Table 142 Number of new employees hired in the Group in 2024

	2024
Women	508
Men	331
Total	839

active employees excluding technical and duplicate positions within the Group

Characteristics of associates workers in the undertaking's own workforce (S1-7)

Total number of associates who are not employees and whose work is controlled by the organisation. Nature of work performed: registration of contracts for the sale of financial products, sale of insurance, completion of documentation, verification of documents, etc. office work.

Table 143 Characteristics of associates in the Group (as of 31 December 2024)

	2024
Number of associates	319

Collective bargaining coverage and social dialogue (S1-8)

A Company Collective Bargaining Agreement (CBA), a type of collective agreement, is concluded through negotiations between the employer and employees who are represented by company trade unions operating at the Bank.

CBA is normative, which means that its provisions have the same effect with respect to employees covered by it as provisions of laws. The provisions of the Collective Bargaining Agreement regulate the mutual rights and obligations of the parties to the employment relationship, including in particular the terms and conditions of work and pay and other work-related benefits. In this document, the parties to the agreement may establish working conditions that will be more favourable than in the provisions of the Labor Code. In our CBA, we have provisions that are more favourable than those generally applicable on the market. Thanks to such an agreement, the conditions of employment and remuneration are better adapted to the specifics of the Bank.

The agreement has been made for the Bank's employees, although the application of the agreement is excluded in its entirety with regard to:

- members of the Bank's Management Board,
- employees seconded to work abroad,
- persons working at the Bank on the basis of secondment from other entities of the BNP Paribas Group,
- persons employed at the Bank under managerial contracts.

Table 144 Percentage of employees covered by collective bargaining agreement

	2024
% of employees covered by a collective bargaining agreement	99%

**Table 145 Scope of collective bargaining and social dialogue in the Group**

Percentage coverage	2024		Social dialogue Representation (EEA only)
	Collective bargaining agreement	Non-EEA employees	
80-100%	EEA employees	-	Poland

A country/region (excluding the EEA) where the BNP Paribas Group has significant employment is defined as a country or region with at least 50 employees, representing at least 10% of the total number of employees.

The employer regularly meets with trade union organisations to engage in dialogue on the rights and professional and social interests of employees. In 2024, 15 agreements were concluded, including the agreement of Protocol No. 3 to the Collective Labour Agreement introducing a remuneration policy and other additional rights for employees aimed at increasing their well-being and creating an inclusive work environment.

The development of social dialogue between employees and management takes place not only locally, but also internationally, in the form of an institution called the European Works Council (EWC).

The EWC in Poland operates on the basis of Directive 2009/38/EC of the European Parliament of 16 May 2009 and the Act of 5 April 2002 on European Works Councils in Poland.

BNP Paribas Bank Polska S.A. and other companies of the Group operating in Poland have their permanent representatives in the EWC, elected in local elections for a four-year term.

The European Works Council is authorised to obtain information and conduct consultations on significant aspects of the company's international and local operations that affect the working conditions of employees in countries belonging to the EWC (European Union countries + exceptionally in BNP Paribas -> England).

The EWC participates in the consultation processes with the Management Board of the BNP Paribas Group on decisions that may have an impact on the cross-border situation of employees. It represents employees working in all BNP Paribas Group units in Poland internationally. It has an impact on BNP Paribas Group initiatives worldwide, and on the content of documents/agreements developed at the international level and applicable in our country. It supports the promotion of the best experiences of other countries in the area of social dialogue development and care for employees in Poland.

Diversity metrics (S1-9)

The Bank attaches great importance to the real implementation of diversity, including ensuring adequate participation of women in the Bank's bodies. The Bank has made strategic commitments in this regard (see Table 136).

Compliance with the principle of diversity is monitored not only at the level of the Bank's bodies, but also at the level of managerial positions.

Distribution of employees by gender and age

Table 146. Group employment structure by gender - number and percentage of employees (as of 31 December 2024)

Employment structure	2024				
	women	men	total		
Management Board (of the Bank and subsidiaries)	4	27%	11	73%	15
Top management (B1+B2)	196	46%	233	54%	429
Lower-level management	287	58%	210	42%	497
Other employees	4,291	65%	2,280	35%	6,571
Total	4,778	64%	2,734	36%	7,512

active employees excluding technical and duplicate positions within the Group

Table 147. Group employment structure by age - number of employees (as of 31 December 2024)

Employment structure	2024			total
	<30 years	30-50 years	>50 years	
Management Board (of the Bank and subsidiaries)		6	9	15
Top management (B1+B2)	4	316	109	429
Lower-level management	7	386	104	497
Other employees	838	4,620	1,113	6,571
Total	849	5,328	1,335	7,512

active employees excluding technical and duplicate positions within the Group

In 2024, the Group had 849 employees under the age of 30, 5,328 between the ages of 30 and 49, and 1,335 employees over the age of 50.

The overall average age in the Group in 2024 is 41.7: 41.0 years for men and 42.1 years for women. The longest length of service is 41 years.

Adequate wages (S1-10)

In order to determine the adequate salary in all the countries in which it operates, the BNP Paribas Group relies on data from FairWage Network, which calculates it according to various criteria, such as location (by country and within countries in the main cities where employees work), household size (assuming a household consists of 2 people and a certain number of children, depending on the country's fertility rate) and the average number of income earners in the household. The relevant wage data is updated annually by FairWage Network and forms the basis for the Group's ongoing action plans. According to this data, all employees of the BNP Paribas Polska Bank Group receive appropriate remuneration.

The Group adheres to the minimum wage rules in effect in Poland. As of January 2024, the gross minimum wage was PLN 4,242, and as of July 1, 2024 - PLN 4,300. With regard to the so-called 'adequate wage' The Group defined it as a level of



remuneration that is adequate to cover the basic needs of a worker and his family, particularly with regard to housing, food, health, education, transportation, means of communication and savings.

In August 2024, a new Company Collective Labour Agreement (CLA) and new 'salary ranges' were implemented at the Bank, which were prepared based on job valuation and market benchmarks. The salary in the lowest job category (the minimum in the Bank) was set at PLN 5,000 gross.

In addition to base salary, employees may receive variable remuneration (bonuses), which are awarded based on the Bank's bonus regulations. Bonus amounts are determined based on the quantitative and qualitative performance of employees, the team and the Bank.

Bank employees can also receive non-wage benefits listed in the section: Social security benefits.

Social protection (S1-11)

Benefit offerings for the Bank's employees include: Employee Capital Plans, medical care, life and accident insurance for employees and their relatives (also for part-time and temporary employees), additional insurance for school-age children, discounts on travel insurance and OC/AC motor insurance, additional insurance - oncology package and cardiac package, holiday subsidies for the employee and holiday subsidies for the employee's children from the Company Social Benefits Fund, financial assistance from the Company Social Benefits Fund (also for part-time and temporary employees), housing loans from the Company Social Benefits Fund. All employees are covered by income protection insurance in the event of any of the following (illness, unemployment, accident at work/disability, parenthood, retirement).

Persons with disabilities (S1-12)

Table 148. Percentage of employees with certified disabilities employed by the Group by gender (as of 31 December 2024)

	2024		
	women	men	total
% of employees	1.7%	1.5%	1.6%

active employees excluding technical and duplicate positions within the Group

As of December 31, 2024, the Group had 122 active employees with disabilities, which represents 1.6% of active employees in the Group. In 2024, 8 employees with disabilities were employed.

Training and skills development metrics (S1-13)

Table 149. Percentage of employees subject to regular performance and career development reviews in 2024

	2024		
	women	men	total
Percentage of employees subject to regular performance and career development reviews	100%	100%	100%

The process of setting goals and annual evaluation covers employees employed by the Bank on the basis of an employment contract, provided that the following conditions are met cumulatively in the year to which the evaluation relates:

- remaining in an employment relationship with the Bank continuously for at least three months,
- working ('presence at work') a total of at least 90 calendar days.

The percentage of employees who took part in the performance review was calculated based on the population eligible for the review (i.e. 7,235 employees). In addition, the percentage of employees who took part in the employee reviews only includes employees in entities that use the AboutMe platform, which is used to manage employee performance, career and development..

Training

Training at the Group is understood as initiatives implemented by the Group companies that aim to maintain the level of skills or improve the skills and knowledge of their own human resources. They include both training at the headquarters of the Bank/Group company as well as online training, so-called e-learning.

Table 150. Average number of training hours for employees in 2024

	2024		
	women	men	total
Average number of training hours completed by employees	27.1	29.3	27.9
Average number of training hours completed by employees (excluding mandatory training)	13.8	18.7	15.5

active employees excluding technical and duplicate positions within the Group

The average number of training hours is constantly increasing due to the improvement of development offers and the training experience of employees. Due to the nature of our business, the employees of the Group have to undergo so-called compulsory training every year, in particular for regulatory reasons.



Health and safety metrics (S1-14)

Table 151. Health and safety at work in 2024

	2024
% of employees covered by an occupational health and safety management system based on legal requirements and/or recognized standards or guidelines	100%
Number of fatalities due to work-related injuries and illnesses	0
Number of registered work-related accidents	18
Percentage of recordable occupational accidents (frequency rate: number of accidents per 1 million hours worked)	0.77
Number of recordable cases of work-related ill health (subject to legal restrictions on data collection)	1
Number of days lost due to work-related injuries and work-related fatal accidents, work-related ill health and fatal accidents related to ill health	577

The occupational health and safety management system covers all employees of the Group who are employed on the basis of an employment contract.

In 2024, the majority of accidents at the Bank occurred in the office area, including slips, trips and falls on stairs. There were also three accidents that were considered equivalent to an accident at work (while on a business trip), and three accidents happened during remote work. There were also no fatalities or serious injuries.

Work-life balance metrics (S1-15)

All Group employees are entitled to at least one of the following types of absence for family reasons: maternity leave, paternity leave, paternal leave, unpaid time off and child or family carer's leave.

Table 152. Percentage of eligible employees who took family-related leave, broken down by gender

	2024
Percentage of employees entitled to take leave for family reasons	
women	100%
men	100%
Total	100%
Percentage of employees entitled who took one family-related leave	
women	28%
men	13%
Total	23%

entitled employees excluding technical and duplicate positions within the Group

The Group also carries out numerous activities promoting parenthood, which you can read about in the section: [Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions \(S1-4\)](#).

Remuneration metrics (pay gap and total remuneration) (S1-16)

Table 153. Pay gap metric (as of 31 December 2024)

	2024
Pay gap metric (total pay)	31.5%
Pay gap metric (fixed pay)	29.6%

active employees excluding technical FTEs and duplicate positions within the Group

At the Bank, we implement a rational, balanced and controllable remuneration policy that is consistent with our strategy, accepted level of risk, standards and key values. The policy is based on clear principles and addresses good market practices in the field of remuneration. Formally, the remuneration rules are set out in the "Company Collective Bargaining Agreement" and the "BNP Paribas Bank Polska S.A. Employee Remuneration Policy". In addition, the Bank has a policy for remunerating persons who have a significant impact on the Bank's risk profile.

We calculate the pay gap for active employees remaining in employment as of December 31, 2024, excluding technical and duplicate positions within the Group. The indicator was calculated based on the annual gross basic salary from 2024 and the variable salary awarded in 2024 for achieving targets from 2023.

Table 154. Ratio of the highest annually paid individual to the median total annual remuneration

Remuneration metric	2024
Ratio of the highest annually paid individual to the median total annual remuneration of all employees (excluding the highest)	41.5

The ratio of the highest paid individual to the median remuneration of all active employees remaining in employment as of December 31, 2024, excluding technical and duplicate positions within the Group is primarily due to the valuation and positioning of positions.

Incidents, complaints and severe human rights impacts (S1-17)

Table 155. Incidents, grievances, and severe human rights impacts

Incidents, complaints, violations	2024
Number of discrimination cases, including harassment and mobbing, handled in 2024	2
Number of complaints handled in 2024 regarding social issues related to working conditions, equal treatment (excluding discrimination, harassment and mobbing)	15
Total amount of significant fines, penalties, and damages as a result of incidents and complaints (discrimination and harassment)	0
Number of serious incidents involving human rights violations	0



Employees who have experienced disrespect towards themselves or other people should first contact their superior or HR Business Partner. If, for various reasons, this is not possible, they can also use other channels (described in the Policy of dealing with violations of respect for others at BNP Paribas Bank Polska S.A.).

All reports are reviewed by the Employee Relations Team, while matters concerning behavior that may indicate the occurrence of mobbing, discrimination, harassment or sexual harassment are referred to the Employee Standards of Conduct Committee for review.

All reports are analysed with due seriousness, reliably, fairly and with full discretion.

The Group is guided in its activities by high ethical standards resulting in particular from the law, recommendations of supervisory bodies, standards provided for in the Code of Conduct of the BNP Paribas Group and other internal regulations. This applies to every activity of the Bank and its subsidiaries, regardless of its nature, and to all persons who represent or cooperate with the Bank. The absence of serious human rights incidents only confirms that the organisation ensures respect for human rights in all its relationships with employees, entities belonging to the supply chain, customers and the communities involved.



Consumers and end-users (ESRS S4)

This part of the Sustainability Statement describes four topics related to consumers and end users of the Group's products and services: data privacy protection, transparent and adequate information, Customer satisfaction and social inclusion.

Below is an analysis of the strategies, policies and activities implemented by the Group with regard to consumers and end users, defined as direct retail Customers of the Retail and Business Banking and Personal Finance Banking segments.

Strategy

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 – SBM-3)

As a result of the double materiality assessment (DMA) conducted by the Group, as described in the Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) section, General disclosures (ESRS 2) part, a number of significant impacts, risks and opportunities (IRO) related to consumers and end users were identified.

Significant impacts identified by the Group

Impact related to transparent and relevant information and Customer satisfaction

Financial products and services offered to retail Customers could have a significant negative impact if the information provided to Customers is not sufficiently clear and comprehensive. For example, if the terms of a loan or investment product are not presented in a clear and fair manner, there is a risk that Customers may be misled and make decisions that are not in line with their needs or financial situation. This exposes them to possible financial difficulties.

This can be particularly harmful to Customers who are vulnerable or less familiar with complex financial instruments, increasing their risk of financial loss or making poor investment choices. The tool used to reduce this risk is the implemented, legally compliant, MIFID suitability test for Customers, which is also available to online banking Customers and is completed by Customers before they start investing. For those who want to use the credit offer, we conduct a creditworthiness analysis, which helps protect Customers from incurring liabilities that do not correspond to their financial capabilities. Marketing materials and communication to the Customer are verified in terms of plain Polish language, so that the content communicated to Customers is clear and understandable. In addition, the Bank takes control measures, for example in the area of Customer satisfaction surveys, where we ask product owners not only about their satisfaction with the products, but also about the transparency of documents or credit processes and whether the Customer received the information they needed during the sales process and whether they were clear and understandable to them. Possible corrective actions are taken based on the analysis of the survey results, as well as telephone conversations and Customer complaints.

Due to the large volume of products and services launched by the Bank, the lack of adequate information could potentially affect a large number of Customers, but due to the measures taken by the Bank, this risk is mitigated.

Impact on Customer satisfaction

Customer dissatisfaction can be the result of a one-off incident and means that the Bank has not met the Customer's needs. Such an incident may relate to operational issues (e.g. difficulties in accessing online banking) or business issues (e.g. selling a product that is not tailored to the Customer's risk profile).

Impact related to inclusion

For the Bank and the BNP Paribas Bank Polska S.A. Group, accessibility means, among other things, facilitating access to services and products for the elderly and people with disabilities.

Activities that have a positive impact on social inclusion

The Bank carries out activities for our Customers that have a positive impact on their social inclusion:

- we implement plain language principles for communication with Customers;
- we increase availability, which has an impact on Customers in Customer Service Centers and Contact Centers [more in section: [Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and endusers, and effectiveness of those actions \(S4-4\)](#)].

Actions that have a positive impact on Customer satisfaction

The Bank provides all employees with the results and reports of retail Customer satisfaction surveys on an ongoing basis. We combine them with operational and complaint data. This allows us to create detailed recommendations for each Customer's individual path. We evaluate planned initiatives in terms of their impact on the Customer and select the most important ones. Every year, we organize Customer Days, during which we show our employees how to work with the Customer's voice. We run the Mastercard Priceless Moments programme, in which we reward Customers for banking with us.

Material risks identified by the Group

Risks related to data privacy protection

The Group processes a certain amount of personal data relating to retail Customers, such as identification data (e.g. name, ID card number, PESEL number, etc.) or contact details (e.g. postal address, e-mail address, telephone number, etc.). The Group may be exposed to legal and reputational risks arising from violations of data protection laws, such as violations of the General Data Protection Regulation (GDPR) in the European Union and/or the loss or theft of confidential information about its retail Customers.

When defining data protection measures, the Bank analyses the risk to specific Customer groups, such as the elderly, children, and online banking Customers, who may be more vulnerable to data breaches as part of the personal data protection assessment.



Risks related to clear, transparent and non-misleading information

Failure to protect Customers' interests may result in the risk of sanctions being imposed by regulators and the risk of Customers taking legal action.

Risk related to loans denominated in Swiss francs (CHF) or foreign currency loans

The Bank identifies legal risks related to pending litigation involving loans denominated in Swiss francs or Swiss franc foreign currency loans, which it has not offered since 2012. The Bank estimates the impact of legal risk on an ongoing basis, taking into account the current status of judgements in cases against the Bank and the line of case law. At the same time,

since December 2021, the Bank has been conducting individual negotiations with clients with whom it remains in dispute or for whom there is a reasonable risk of entering into a dispute. For more information on the proceedings in this case, as well as a description of other proceedings involving Customers, see Note 53 in the Consolidated Financial Statements.

Material opportunities identified by the Group

During the double materiality analysis, it was not possible to quantify the expected financial scale of opportunities in relation to the topic of social inclusion, therefore the Bank decided to treat this opportunity as insignificant.

Table 156 Presentation of the correspondence table summarizing the links between the material IRO and Policies, Actions, Metrics and Targets

Category	IRO	Name of the policy	Actions	Metrics and Targets
Impacts	Financial difficulties due to lack of information	Code of Conduct Policy on the protection of the interests of Clients	Transversal training actions Implementation of clear, transparent and non-misleading information and specific measures, such as formalizing guidelines for drafting contracts Complaint management, rules for informing retail Customers and responding to their inquiries Continuous improvement process	-
Impacts	Customers dissatisfaction	Code of Conduct Policy on the protection of the interests of Clients	Transversal training actions Net Promoter System with Innerloop (activities undertaken in response to current issues raised by Customers by the first line of service) and Outerloop (activities requiring inter-organizational cooperation) processes	NPS
Impacts	Impact related to legal risk and loss of reputation resulting from the loss or theft of confidential data Avoiding data leakage	Code of Conduct Bank's data protection policy	Transversal training actions Data protection risk management process Dedicated management Dialogue channels with retail Customers Continuous improvement process	-
Impacts	Social inclusion	Code of Conduct	Transversal training actions Continuous improvement process Accessibility projects	Number of Customer Centres with the 'Barrier-free Facility' certification
Risks	Legal risks due to lack of information	Code of Conduct Policy on the protection of the interests of Clients	Transversal training actions Implementation of clear, transparent and unambiguous information and concrete measures, such as formalizing guidelines for the creation of commercial documents Complaint management, rules for informing retail Customers and responding to their inquiries Continuous improvement process	-
Risks	Legal risks associated with Swiss franc mortgages		Individual settlements offered by the Bank to customers with loans denominated in Swiss francs or foreign currency loans in Swiss francs	-



Interaction with the Group's strategy and business model

The significant negative impacts identified by the Group in relation to retail Customers (financial problems related to lack of information or dissatisfaction) are not the result of its strategy. These are negative external impacts of its activity. They concern unintended defects related to its products or services and unplanned negative consequences of the Group's activity.

The material risks identified by the Bank in relation to retail Customers relate in particular to non-compliance with laws or regulations, loss or theft of data, or lack of information about products and services being placed on the market. These are risks inherent in banking activities, and the Group seeks to mitigate these risks as part of its strategic activities.

Impacts, risks and opportunities management

Policies related to consumers and end-users (S4-1)

In order to manage the significant impact of its products and services on Customers and end users, as well as the significant risks and opportunities associated with them, the Group has implemented the policies that are presented and described in the table below. They apply to all retail Customers, as defined in the introduction to this chapter, without exception.

Table 157 Summary of the Group's Policies relating to Consumers and end-users

Name of the policy	Description of the policy content	Description of the scope of the policy or its exclusions	Description of the highest level of the organization responsible for implementing the policy	Interaction with stakeholders
Code of Conduct	The Code of Conduct sets out the rules of conduct that apply to all activities and employees of the Group.	Code applies to all entities of the BNP Paribas Group	Bank's Management Board and Bank's Supervisory Board	The Code of Conduct is available on the Bank's website ⁹
Policy on the protection of personal data	It regulates the Bank's strategy in this area, setting out rules for all categories of data subjects (Customers, employees, service providers, etc.) and all personal data processing activities in all of the Bank's distribution models.	BNP Paribas Bank Polska. Subsidiaries have their own policies.	Bank's Internal Audit Department, Bank's Management Board	The policy is available internally only. The Bank publishes "Personal Data Protection Information Clauses" in Polish, English, Russian and Ukrainian and the "Personal Data Protection Charter" on its website for its Customers. ¹⁰ The purpose of the documents is to explain to Customers how the Group and the Bank process their personal data and how they can exercise their rights.
Policy on the protection of the interests of clients	The policy sets out the organizational and procedural rules that must be applied throughout the Customer relationship and at all stages of the product and service life cycle.	BNP Paribas Bank Polska	Compliance and Ethics Department of BNP Paribas Bank Polska, Bank's Management Board	The policy is published internally only. A summary containing information on the Protection of Customer Interests is available in the BNP Paribas Group Code of Conduct available on the BNP Paribas website.

⁹ https://www.bnpparibas.pl/_files/assetmanager/item/1515413

¹⁰ <https://www.bnpparibas.pl/repozytorium/rodo>



Regarding the monitoring processes, all policies presented in this table are subject to continuous and periodic internal controls. The Bank's data protection policy is monitored by the Data Protection Officer, who is located in the Risk department as part of the second line of defense. It may also be subject to first-line control based on the control plan adopted for the year.

All policies listed in the table above are in line with internationally recognized frameworks applicable to consumers and end users, including the UN Guiding Principles on Business and Human Rights.

With regard to retail Customers, the right to privacy is recognized and integrated into the Bank's Personal Data Protection Policy and its internal procedures, established in accordance with European regulations in this area, such as the GDPR. The Group, as a financial institution, does not identify any severe violations of the fundamental human rights of retail Customers in connection with its activities. The Group has not recorded any cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the International Labor Organization Declaration or the OECD Guidelines for Multinational Enterprises.

The whistleblowing system can be activated by external stakeholders through the channels specified on the Bank's website.

The protection of whistleblowers against the risk of retaliation has been strengthened by the Whistleblower Protection Act of 14 June 2024. On the one hand, anyone who needs to know about a report during its processing is formally obliged to respect the confidentiality of the information concerning the whistleblower and any person involved. On the other hand, the Group guarantees the protection of whistleblowers against the risk of retaliation, and any person who believes they are the victim of retaliation can submit a report that will be handled according to the standards defined by the Human Resources Management Area. This protection applies regardless of the whistleblowing channel used by the whistleblower.

Processes for engaging with consumers and end-users about impacts (S4-2)

Clear and non-misleading information

The policy of protecting Customers' interests defines the following general rules for the operational implementation of which each segment and organizational unit of the Bank, including the Compliance and Ethics Department, is responsible:

- The Customer must have access to information that is reliable, fair, transparent, understandable and not misleading about products and services, both in form and content, regardless of the channel or format.
- Before distributing a product or service, the entity must provide Customers with all the information necessary to enable them to understand:
- what they are buying, including the features, advantages and disadvantages of the product or service: any information that does not mention the advantages and disadvantages of the product or service in a balanced way would be considered misleading;

- details of how much they are paying, i.e. the cost of products, services and advice.
- Information should be provided to Customers throughout the life cycle of the product or service, if necessary.
- The product or service must be easy to explain and understand for Customers in the market for which the product or service is intended.
- Questions from Customers must be answered as quickly and as best as possible.

Within the Group, there is an obligation to:

- Comply with local regulations.
- Implement an internal control system to ensure transparency of information for Customers and compliance with applicable regulations.

Each business manager is responsible for the implementation of this process.

The protection of Customers' interests is the subject of training for employees, in particular the teams responsible for Customer relations and management (more information in the section on Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and endusers, and effectiveness of those actions (S4-4)).

Customer satisfaction

As part of the Advocacy programme, which has been executed at the Bank since 2017, a system is being implemented to listen extensively and continuously to the voice of Customers.

This programme is based on:

- a multi-channel survey system to collect Customer opinions at various stages of their relationship with the Bank:
 - annual Net Promoter Score (NPS) benchmarks, which measure the level of recommendation of the Group's Customers and compare it with the level of competition in many elements of Customer relations;
 - relationship surveys: Customers are asked about four times a year to give their opinion on their relationship with the Bank;
 - transactional surveys conducted after a Customer-bank interaction (e.g. branch visit or phone call to Customer service) or a specific Customer journey (e.g. establishing a relationship, managing credit card).



In addition to the NPS score and operational indicators (conversion rate, duration, etc.), the Bank also measures the feelings of employees to gain the most in-depth insight into the Customer Journey, i.e. how Customers feel when they are in contact with us.

- analyzing Customers' spontaneous expressions, such as complaints [discussed in the next section: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)] or their activities on social networks.

In addition, the results of the NPS benchmark are supplemented by the results of the unit's entire Customer feedback system. The lessons learned and topics to be addressed are communicated to the Management Board, unit managers and all employees concerned at the highest operational level.

Every year, the Bank sets the goal of improving our position in relation to its competitors.

In 2024, there were around 118,000 surveys conducted with retail Customers.

All employees of the Bank are responsible for building Customer satisfaction while the highest function in the area of Customer experience is the Management Board. The central unit responsible for Customer experience at the Bank is the Customer Experience Strategy and Development Department.

When developing its products and services, the Bank focuses primarily on the Customer's needs. This allows it to have a broader view of the Customer and to better tailor its processes and products to their main needs. An example of the effects of such an approach was the implementation of initiatives that improved the Customer experience related to opening a personal account, such as improvements in the remote verification process, shortening the time to deliver the card, and extending the time to sign the contract remotely. The Bank has observed the effects of these improvements in the increase of NPS results related to this process. By mapping the experiences and emotions of Customers on their purchasing paths, the Bank accompanies them at all stages of the process. It listens to the Customer's voice as well as the voice of, for example, the employees who know the process. This approach makes it possible to identify the stages that can be challenging for the Customer or employee.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

Complaints management

Complaint management is a key element of the Group's policy on protecting Customers' interests and is subject to specific operating procedures.

The policy on protecting Customers' interests sets out the rules for handling complaints:

- Customers must be clearly informed about the channel and process for handling complaints and, where appropriate, the mediation protocol. In addition, the Bank has a Customer Ombudsman. Cases referred to him, handled by a dedicated group of employees, are independent of the original complaint handling process.
- complaints must be confirmed and Customers must be regularly updated on the progress of their complaint.
- a response must be provided to the Customer within a maximum of 60 calendar days.
- complaints are handled free of charge.

Within the Group:

- employees who have contact with the Customer have sufficient knowledge about the complaint process.
- compliance with the rules for handling complaints is monitored.
- the reasons for complaints are analysed, and information is also provided about quality improvement programmes. In this way, these channels allow the Group to draw conclusions for continuous learning.

Standards for handling complaints and providing responses are described in the "Complaint Handling Policy." The document defines the responsibilities at each stage of the process and indicates the division of roles, tasks and responsibilities of the units involved. It also indicates the forms of complaint submission available to our Customers. Customers can submit complaints:

- via chat in GOonline internet banking or in the GOMobile application,
- via the complaint form in GOonline electronic banking, Contact - Complaints tab,
- via the online form on the Bank's website,
- by phone – via the hotline: +48 500 990 500 or +48 22 134 00 00,
- by post to the following address: BNP Paribas Bank Polska S.A. Complaint and Letters Processing Operations Team ul. Żelazna 10 40-851 Katowice,
- directly – at any branch of the Bank.

Customers also have the option of referring the matter to the Customer Ombudsman:

- via the form on the website: <https://www.bnpparibas.pl/kontakt/formularz-rzecznik-Klienta>,
- by e-mail: rzecznik.Klienta@bnpparibas.pl,
- by post: BNP Paribas Bank Polska S.A. Rzecznik Klienta (Customer Ombudsman) ul. Kasprzaka 2 01-211 Warsaw.

The process of handling complaints at the Bank is one of the main sources of Customer feedback. The signals the Bank receives help to develop and thus meet the expectations and needs of our Customers.



The Customer Dialogue Department (from 2025: Complaints and Letters Operations Team) consisted of four specialized complaint teams that deal with various types of complaints, including the Customer Ombudsman Team. Thanks to this, all units responsible for handling the complaint process jointly diagnose problems reported by Customers and work to eliminate them in the future as well as to adapt more effectively to the expectations set by regulators in terms of quality. This also allows the Bank to respond more quickly to our Customers. In this way, we are implementing the two main pillars on which the complaint process is based: quality and operations. The Bank's actions have resulted in 4.5% fewer complaints in 2024 compared to 2023. This also translates into a positive assessment of the complaint process by our Customers in the regular NPS surveys. The result at the end of 2024 was 19 points, an increase of almost 3 points compared to 2023.

- 14 calendar days – average complaint processing time in 2024.
- Almost 5% fewer complaints in 2024 compared to 2023.

The number of complaints registered by the end of December 2024 was 56,930 (this applies to all retail Customers and all types of complaints).

The Bank responds to Customers' voices not only in the context of complaints and grievances received. The joint path of the Customer and the Bank is also characterized by non-standard cases that require an individual approach. These are the cases handled by the Customer Ombudsman Team, which is consulted by Customers who disagree with the decision after the complaint has been processed. The Customer Ombudsman Team verifies the complaints that Customers have addressed to the Bank's Management Board, Supervisory Board, and Press Spokesperson. It also supports the service and communication with Customers who raise problematic and important issues for them on social media.

- In 2024, the Customer Ombudsman received 2,619 cases (including 132 referred directly to the Bank's Management Board).
- 84% of the people who used the Customer Ombudsman's help in 2024 were retail Customers.
- 20% of the topics (the highest percentage) for which the Customer Ombudsman took action in 2024 concerned reports of unauthorized payment transactions.

In connection with the complaint, the Customer may submit an appeal through the channels described above. They also have the option to appeal to other authorities. The competent bodies on the part of the Bank authorized to conduct proceedings in the matter of out-of-court settlement of consumer disputes are:

- Banking Arbitrator at the Polish Bank Association,
- Financial Ombudsman,
- Court of Arbitration at the Polish Financial Supervision Authority.

In addition, in order to resolve disputes in connection with a contract concluded electronically, Customers can use the ODR platform available at ec.europa.eu/consumers/odr. The ODR platform allows the Customer to submit a complaint to an entity dealing with out-of-court settlement of disputes between consumers and entrepreneurs in the European Union.

As part of its work, the Bank doesn't just want to point out to the owners of individual products and processes which areas require improvement. It wants the complaint process to be transparent and intuitive for everyone.

The Bank is working on providing employees and Customers with further functionalities of the GObetter complaint system. In their final form, the most important ones are:

- omnichannel – all Customer complaints, regardless of the contact channel, are recorded in a single system;
- Commercial Gesture, a tool that allows advisors to quickly resolve a Customer complaint during the complaint process – the Commercial Gesture is even easier to use. The Customer will quickly receive a refund of the charged fee;
- ease of use – the application is easy and intuitive. It takes less time to enter a complaint. The application prompts the next steps;
- complaint status – system informs about the current status of the complaint. It is convenient not only for the Customer but also for the employee;
- integration with GOonline – the Customer can file a complaint themselves using a dedicated form in the GOonline online banking system. In addition, they have an up-to-date overview of all complaints registered in GObetter in online banking (including copies of responses provided).
- plain language – all communications to Customers and complaint responses are written according to the principles of plain language;
- functionality – much easier reporting. In one database, all the information needed to analyze and make changes can be found;
- increased process automation – especially important in handling transaction fraud complaints. Automation of activities significantly speeds up case verification and response to Customers.

The complaint handling process, both qualitatively and quantitatively, is subject to ongoing monitoring and improvement and can be reflected in the performance evaluation of the units involved in the process. The Bank collects information obtained from incoming complaints and analyzes it in order to “learn”, i.e. to draw conclusions and correct mistakes. The Bank also evaluates the financial impact of the complaints received. Relevant reports are submitted to the Bank's Management Board or members of the Bank's management, to the extent and under the terms specified with individual units. This process is described in the Complaint Handling Policy.

All Customer requests are treated confidentially and with respect for their right to privacy and data protection. In the event of a complaint, it is not possible to fully process the case (provide a response) if the request is anonymous or if the request does not include data that would enable the product/Customer to be identified.

The Bank does not have policies protecting those using the complaint process against possible retaliatory actions by the Bank.



Customer satisfaction

An individual remedial approach is implemented for all Customers who have responded to the satisfaction survey evaluating their contact with the hotline. The advisor is obliged to call back every Customer within a few days whereby we pay special attention to the surveys of Customers who send us feedback. This contact allows us to better understand the Customers' opinion and its source.

Wherever possible, the Customer is provided with an immediate solution. The advisor or consultant directly serving the Customer must implement corrective measures if the problem for the Customer occurs at the local level (Innerloop) or forward it to the Customer Experience department if it is a process problem whose solution is not directly controlled by the unit serving the Customer at the local level (Outerloop).

The results are communicated in cross-functional analyses and via a platform that displays Customer feedback, which facilitates the cyclical sharing of results within the Bank and their monitoring.

The Bank draws conclusions from the corrective actions taken, which allows to engage in a continuous learning process. The Customer Experience team regularly shares Customer issues and action plans to resolve them with their managers and the business. The plans are constantly updated to reflect new Customer feedback data from satisfaction surveys or complaints.

The Bank's Customers can use the channels offered by the Bank to report their concerns and needs. These are then clarified by the first line and, if necessary, registered as complaints. The following contact channels are available to Customers:

- chat in the GOmobile and GOonline banking application,
- for Customers without online banking, a chat on the Bank's website (however, we prefer verified channels in order to provide the Customer with the most accurate information possible),
- the possibility of a video chat,
- a video meeting with an online expert,
- a contact form,
- a hotline with the option to call directly in the application,
- traditional branches, i.e. Customer Centers,
- Customers also provide their opinions and comments in satisfaction surveys and on social media.

Information on the access channels can be found on our website under "Contact".

The Bank's channels are diverse and take into account the different needs of our Customers. Based on quarterly analyses of the difficulties experienced by Customers, which are communicated to the product owners, possible corrective actions are planned to address these needs. The Bank's units have a multi-channel approach and ensure the high quality of the access channels. A particular example of the measures we take is to increase accessibility for people with special needs. The Bank

also has an Online Expert Center for Retail Customers in the mortgage area. It is also available to the premium Customer segment. It supports the development of transferring stationary banking to the Internet. The main mission of the channel is to create a fully remote branch of the Bank serving Customers regardless of their place of residence.

The efficiency of communication channels is assessed based on NPS (Net Promoter Score) research, i.e. whether Customers recommend the bank, FCR (First Contact Resolution), i.e. whether the Customer has resolved the issue in the first contact, and CES (Customer Effort Score), i.e. the effort put in by the Customer to resolve the issue. In the Contact Center, we also monitor the percentage of calls answered within 30 seconds, the percentage of calls answered in relation to all calls, and the average waiting time for a call.

Customers can safely and without fear submit their complaints and comments. Although the Bank does not have separate regulations regarding the protection of Customers against retaliation, the Polish legal system prohibits the repression of Customers for submitting complaints.

When conducting surveys with Customers, the Bank applies the applicable GDPR regulations. Depending on the type of survey conducted, they are anonymous or not, but the Customer has the right to object and not to share the data with the Bank, including objecting to being contacted about the opinion provided after the satisfaction survey. Due to their nature, complaints are not anonymous.

Social inclusion

In addressing its impact on retail Customers in terms of social inclusion, the Group focuses on increasing the accessibility of its products and services, as described in the section Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and endusers, and effectiveness of those actions (S4-4). The Group relies on the same corrective processes that are used for other retail Customers, which are described in the sections on Customer satisfaction and complaint management.

Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and endusers, and effectiveness of those actions (S4-4)

The Group implements various measures to prevent, minimize and correct negative impacts on retail Customers, to manage the associated significant risks and to take advantage of the related opportunities.

Transversal training actions

The Group conducts training actions for employees aimed at managing main risks and utilizing significant opportunities with regard to retail Customers. It organizes trainings related to the protection of the Group's Customers' interests, primarily an extensive training course on the Code of Conduct assigned to all employees. It has been enriched with information on ethics alert channels and a new module on diversity, equality and inclusion.



In addition, all employees of the Group must undergo mandatory privacy training. Regular campaigns also promote increased awareness of cyber and privacy risks.

Actions in favour of data privacy protection

Risk management process related to the protection of personal data

The personal data protection policy of the Group and Bank includes the process of identifying, classifying and assessing the risks associated with personal data processing activities affecting data subjects, including retail Customers.

The Group implements a range of organizational and technical actions aimed at limiting and preventing risks related to the processing of personal data, including the risk related to the loss of confidential personal data, breach of its integrity or availability. In accordance with Article 32 of the GDPR regulation, these measures include:

- pseudonymization and encryption of personal data;
- the ability to ensure the confidentiality, integrity, availability and resilience of data processing systems and services;
- the ability to restore the availability and access to personal data in a reasonable time in the event of a physical or technical incident.

Management

Management of Customer data protection, based on a network of Chief Data Officers (in the Group Data Office as a part of the first line of defense) and Data Protection Officers (in the Risk structures as part of the second line of defense), ensures the application of the data protection framework for which they are responsible. This network is supported by specialized experts within the legal department (second line of defense). The permanent and periodic control functions (third line of defense) are responsible for ensuring the correct application and effectiveness of the data protection framework.

Channels for dialog with retail Customers

The Group's principles, in accordance with the GDPR, provide for the direct notification of data subjects in the event of a breach of the protection of their personal data. Data subjects are thus informed as soon as possible of their rights and can take the necessary measures to protect themselves.

Retail Customers can contact the Bank at any time, either directly or through the data protection authorities, with any questions or complaints regarding the processing of their personal data. In addition, the Bank's suppliers are required to inform the Bank of any Customer requests and to assist in responding to them.

The channels that facilitate the dialog with the Customer are described in the Bank's personal data protection information clauses and on the Bank's website. These documents also contain instructions on how to submit complaints to the President of the Personal Data Protection Office. Complaints are treated confidentially and securely to ensure access on a need-to-know basis only.

The dialog process with retail Customers regarding personal data protection is organized in the Group around Data Protection Officers, who work in cooperation with the Group Data Protection Officer and act as personal data guardians for data subjects. They act within an autonomous control function, thus ensuring sufficient independence. The Data Protection Officer appointed at the Bank, who is located in the Risk area, ensures independent supervision of the processing of personal data.

Operational responsibility for the existence of dialogue within the Group lies with the teams responsible for managing personal data protection as part of the second line of defense and the management boards of the companies.

Continuous development process

In 2024, the Bank continued to expand its network of data protection specialists. Currently, the Bank has a team of Data Protection Officers (as part of the second line of defense), responsible for the application of personal data protection principles and increasing the level of maturity in the field of personal data protection.

The effectiveness of the processes for responding to complaints from data subjects relating to data protection is subject to both constant (through control functions) and periodic (through audits) controls. In addition, they can also be monitored by data protection supervisory authorities and courts. The contact details of the supervisory authority are provided in the "Data protection notice" and are available to the Customer at any time upon request.

The Group draws conclusions from both data breaches and interactions with data subjects in order to improve channels of communication and prevent and mitigate future consequences. If necessary, additional information is exchanged with the persons concerned in order to better clarify their requests or to gather additional information, thus ensuring the most appropriate response.

Actions in favour of transparent, clear and non-misleading information and complaints management

Clear, transparent and non-misleading information

These activities are described in the section on Processes for engaging with consumers and end-users about impacts (S4-2). In addition, the Group implements activities in accordance with the identified needs of retail Customer groups, such as formalizing guidelines for drawing up contracts or practices to prevent greenwashing.

Complaints management

These measures have been described earlier in the section on Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3). Customers are informed about the complaint process and mediation protocol in place in the Group, both in the Customer Centers and on the website. A Customer who has submitted a complaint must receive confirmation of its receipt from the Bank within five calendar days (if it is still being analyzed by the Bank). Customers are regularly informed about the progress of their inquiry, and a final response is provided within a maximum of 60 days.



Continuous improvement process

The process of analyzing the causes of complaints received and solutions provided supports the continuous improvement of the Group. The complaint report is presented once a quarter at the Management Board meeting and the Supervisory Board meeting. The topic of complaints is also discussed quarterly during Code of Conduct meetings.

The Bank invests in the development of the GObetter complaint system and other tools to improve complaint management. The Bank uses compliance procedures to manage risk and ensure the highest quality of service. The Bank also monitors Customer experience on the purchasing and service paths as part of Customer journey and NPS surveys, as described in the section on [Processes for engaging with consumers and end-users about impacts \(S4-2\)](#).

Focus on Customer satisfaction

The following resources are responsible for handling complaints:

- Customer Dialogue Department (since 2025 Complaint and Letters Processing Operations Team),
- Director of the Customer Dialogue Department, who currently also serves as the Bank's Customer Ombudsman.

If errors are identified that result in financial loss or undue charges to the Customer, the Bank takes the following actions:

- if fees or commissions have been incorrectly charged, the employee handling the complaint will refund the disputed fee as part of the complaint. Information about the error resulting in the complaint is reported to the appropriate product/process owner;
- when an event that results in an operational loss is identified, it is settled in accordance with the Bank's Instruction for Recording Operational Events and Action Plans.

If the Customer's claims are recognized, the losses are immediately eliminated in the complaint handling process (which consists, for example, of cancelling an incorrectly charged fee). Financial losses resulting from system/process malfunctions/human error are reported directly to the people managing the product/process for which the errors were identified.

Actions for Customer satisfaction

In order to better understand and respond to Customer expectations, the Bank has designed tools to address the significant topics that could have negative impact in the area of Customer satisfaction.

The Customer Experience team is responsible for the cooperation model, monitoring and sharing of NPS results and:

- is responsible for the standards and methodologies for implementing the NPS system;
- regularly communicates the results of the NPS survey and tracks Customer pain points;

- is a member of internal decision-making teams to represent the voice of Customers, recommending changes and improvements to sales and after-sales processes in the Customer journey.

As part of its work on the Customer journey, the team also conducts the Outerloop stage described in [Processes to remediate negative impacts and channels for consumers and end-users to raise concerns \(S4-3\)](#)

Customer Satisfaction

It consists of:

- Collecting all available feedback from Customers (from surveys, complaints, social networks, etc.).
- Conducting an in-depth analysis to identify the key difficulties experienced by Customers and their causes;
- Prioritizing and solving these problems with the relevant operational teams.

To ensure a positive impact on our Customers, the Bank has implemented the following measures:

- supports Customers from Ukraine, for whom we have developed a special personal account offer;
- develops the Self-Management Offer aimed at children;
- enables Customers to open a personal account remotely using a mobile application and courier service;
- In response to the defined problems of our Customers, further processes available online have been proposed:
 - online application for cash loans: the Bank enables remote end-to-end application and obtaining of cash loans also for people who are not the Bank's Customers (and without the requirement to open an account with the Bank) with identity and income verification using bank income verification (so-called open banking);
 - enabling data update instructions using the mObywatel application, which enables Customers to can update their data through the mObywatel application using a QR code;
 - In GOonline online banking, the Customer can attach and forward to the Bank documents that, according to the loan agreement, are to be provided after the loan has been granted, e.g. notarial deed, energy performance certificate, application to the court for registration of a mortgage, settlement of the last tranche, building use permit.

In 2024, the Bank offered support to individuals and companies affected by the floods: making it possible for Customers who were affected by the floods or their immediate consequences to defer their loan repayments. Customers affected by the floods could benefit from the Borrower Support Fund. This fund provides assistance to borrowers who find themselves in a difficult financial situation and are obliged to repay housing loan instalments. It operates on the basis of the Act of 9 October 2015.

Another example of a positive impact is the Loan for Green Change for retail Customers, which can be used for the replacement of heating systems, modernization and insulation or modern technologies.



In addition, the Bank continues to spread knowledge that builds a Customer-oriented organization. In 2024, once again:

- It showed how to create Customer paths (i.e. Customer experience maps) for subsequent owners of products and processes as part of the Agile Academy;
- It continued the Customer Excellence Board meetings, during which we discussed the key needs of our Customers;
- As part of onboarding, new leaders in Customer Experience were trained, because managers involvement is fundamental in building a Customer-oriented organization;
- In cooperation with the Leon Kozminski Academy, the Bank implemented a certification programme for all Quality Managers in branches (Customer Centers) and people supporting the building of Customer experience;
- It continued to implement the objectives of the Advocacy Programme, which focuses on many aspects of Customer centricity, such as building awareness among employees about the importance of focusing on the Customer, using knowledge about Customers and employees to act and improve the Customer experience, and verifying whether the actions taken have had the expected effects.
- It continued the 3-module online training course Customer Experience – NPS;
- It organised Customer Days under the slogan “Customer today, tomorrow, forever”. Their aim was to inspire our employees to look for solutions that allow them to build long-term relationships with Customers. Among other things, the topics “How technologies can support long-term Customer relationships” and “partnership for generations” were discussed.

The Bank has advanced risk monitoring systems and anti-fraud programmes in place, with regular reporting of results to the Management Board.

The Bank regularly assesses and monitors its practices to ensure that they do not cause or contribute to material negative impacts on Customers. By utilizing the Customer's voice in the analysis of paths, we can precisely identify the problems that Customers face. On this basis, the Bank adjusts its solutions to respond more effectively to their needs and expectations. The analysis of complaints submitted by Customers also helps in this regard. In response to them, the Bank strives to introduce solutions that prevent the occurrence of further complaints.

The resource that the Bank uses to manage significant influences on Customer satisfaction is the Department of Strategy and Development of Customer Experience, which is responsible for collecting and analyzing Customer feedback from various sources.

Surveys among Customers who are acquired through partner channels are conducted, and the recommendations from these surveys are discussed with the units in the Bank that cooperate with the partners.

Both collecting Customer feedback on their experiences with products and service channels and subsequently working with this feedback as part of the inner and outer loop result in improvements to the Bank's business.

Actions in favour of social inclusion, through financial inclusion

The POSITIVE pillar of the Bank GO beyond strategy for 2022-2025 includes the development of sustainable financing and support for Customers in the field of sustainable transformation. One of our goals under this pillar is also access to banking for all. The Bank is committed to improving the accessibility of financial services, diversity and equality to promote a more inclusive society.

The Group is focused on social inclusion, which means enabling all our Customers to have equal access to banking services, with simplicity and the highest level of comfort when using them. It is following the GO beyond strategy for 2022-2025, in which accessibility is one of the key commitments. We place particular emphasis on making banking services more accessible to people at risk of social exclusion. People with disabilities and senior citizens can count on our Bank to provide products and services tailored to their needs, both on-site and online. In this way, the Bank helps to prevent risks for Customers related to difficult access to financial services and achieve positive effects for our Customers. It regularly analyzes all channels of access to our offer in terms of functionality and user-friendliness in accordance with WCAG guidelines.

From a formal point of view, the accessibility of the Bank is regulated in the document ‘Principles of providing bank documents to Customers in a form accessible to people with special needs’. The Bank also meets the requirements of the law on ensuring accessibility for people with special needs. We take a long-term view of our activities.

In 2024, the Bank increased accessibility through numerous activities:

- regularly trained employees in how to deal with Customers with disabilities. We implement Standards for Serving Customers from Vulnerable Groups,
- more Customer Centers have been awarded the “Barrier-free Facility” certificate,
- The number of ATMs adapted for use by people with disabilities has increased to 540 devices,
- our services were adapted to the needs of the elderly.

Accessibility for people with special needs

In each Customer Center, assistance is available from a Polish Sign Language (PJM) interpreter. Induction loops are available in 195 Customer Centers, which are hearing assistance systems that enable a person with a hearing impairment to receive clear and crisp sound through a telecoil, which is included in almost every hearing aid. Customers can also order visual recordings of documents in PJM. Each of Bank branches is equipped with a magnifying glass and a frame to make it easier for visually impaired people to sign. The Bank also provides the option of listening to contract templates as an audio recording, enlarged print and Braille documents.

At the end of 2024, 143 of Customer Centers and the Bank's headquarters were certified as “Barrier-free facilities” by the Integration Foundation. This is the best result among banks in Poland. The certificate confirms that the building has facilities for people with physical, visual and hearing disabilities, the elderly and people looking after children. In practice,



this means that Customers can move around the Bank's premises without obstacles and use the facilities we have implemented. The Bank's strategic goal by 2025 is to have at least 50% of our Customer centers certified as "Barrier-free Facilities".

All of the Bank's branches are also certified with the OK Senior® mark awarded by the National Institute of Senior Economy. We were the first Bank in Poland to receive it. The certificate confirms that the Bank offers senior-friendly solutions and that our services are safe, accessible, understandable and reliable.

In 2023, the Bank's Customer Centers received recertification from the National Institute of Senior Economy and OK SENIOR® Polska for the years 2023-2025 for the third time. The certification of the National Institute of Senior Economy was preceded by the work of auditors who examined whether the services meet the needs of elderly Customers. The OK SENIOR® Quality Mark is a guarantee that the products and services it distinguishes are reliable, of proven quality and, above all, affordable for an older age group of consumers. BNP Paribas Bank Polska is the only one on the financial market in Poland to have this quality mark.

Support for the deaf and hard of hearing in using banking services:

- online connections with a sign language interpreter,
- booking appointments in sign language via online form,
- PJM interpreter available on the hotline,
- visual recordings of document content in PJM,
- induction loops in branches.

How the Bank helps blind and visually impaired people use banking services:

- audio recordings of document templates, enlarged printouts and Braille printouts,
- magnifying glasses,
- signature frames,
- ATMs adapted for use by visually impaired people,
- stickers on glass elements of the Customer Center structures.

In ensuring the availability of products, services and our branches, the Bank is supported by cooperation with partner organizations such as Dostępność Plus, Fundacja Integracja, Dostępny Bankomat, Krajowy Instytut Gospodarki Senioralnej, Migam "RKPK" Sp. z o.o. S.K.A. and Fundacja DeafRespect.

Plain language

One way to increase social inclusion is to simplify the language the Bank uses to communicate with its Customers, making its messages more accessible and understandable. Since 2019, the Bank has been gradually rewriting its documents, letters, communications and promotional materials according to the plain language standard. Plain language is used in communication with all Customer segments, from private individuals to micro-enterprises and corporate Customers. The Bank simplifies legal texts, contracts, terms and conditions and formal documents. More about approach to plain language can be found in the Pillar POSITIVE section.

Effectiveness of actions related to the identified impacts

The actions described above, divided into subject-specific (transparent and adequate information, Customer satisfaction, social inclusion) and transversal (training) actions, enable the prevention, mitigation and correction of the impacts on retail Customers identified by the Bank.

By monitoring complaints and NPS, the Group monitors and evaluates the ability of these measures to achieve the expected results for retail Customers.

The Group also ensures the implementation of processes aimed at addressing any material impacts, as well as ensuring the effectiveness of the implementation of remedial actions and the achievement of results in relation to, for example, the principles described above regarding the response time to a submitted complaint.

The Group monitors and evaluates the effectiveness of its activities and initiatives with regard to key impacts.

The Group, through its internal risk management system, in accordance with data protection regulations (such as the GDPR and the ePrivacy Directive), avoids negative impacts on data subjects with regard to data protection, including to the extent arising from marketing practices or data use.

The personal data protection risk management process is the basis of the Group's system for assessing each data processing operation and process for compliance with the GDPR and the Group's personal data protection policy, taking into account current or planned protection measures. This system also enables the implementation of the actions mentioned in the section [Actions in favour of data privacy protection](#), such as encryption or pseudonymization.

The Group's Code of Conduct promotes the highest ethical standards in the protection of personal data.

In accordance with the Bank's Personal Data Protection Policy, the Bank undertakes never to sell the personal data of its Customers to its business partners.

In 2024, no incidents of human rights violations were reported.



Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

Customer satisfaction

Thanks to the NPS Benchmark survey, the Bank knows the level of recommendation of our services by Customers and once a year we can compare it with the competition. The surveys are conducted in cooperation with a market research institute. The key goal in the area of Customer satisfaction is Net Promoter Score, which is to be in the TOP3 banks. In 2024, the Bank was in the middle of the ranking (6th place at the end of 2024).

The Bank's goals for its Customers are stable and measurable over time and have been defined in the GoBeyond strategy for 2022-2025. The strategy was developed internally by employees representing all key areas of the Bank and by representatives of subsidiaries, including cooperation with the Customer Experience team and the Customer Ombudsman, whose job it was to advocate on behalf of our Customers. The objectives developed under the 4 pillars of the strategy, including those relating to Customers, are described in detail in the chapter on the implementation of the GO beyond strategy, and the results of the strategy implementation are presented in the Strategy, business model and value chain (SBM-1) section of the General Disclosures (ESRS 2) chapter. The Bank uses consistent definitions and measurement methodologies, which enables year-on-year comparison of results. Every year, Customers can familiarize themselves with the Bank's objectives and results by reading Management Board's Report on the activities of BNP Paribas Bank Polska S.A. Group and the Reports presenting non-financial information of the BNP Paribas Bank Polska S.A. Capital Group published in previous years.



Business conduct (ESRS G1)

Corporate governance

The Group's adopted policies are presented below, including those relating to anti-corruption as well as other non-compliance risk issues (financial security, market integrity).

Strategy: In relation to the themes identified, the Group's strategy is determined by the impacts, risks and opportunities (IROs) identified in the double materiality analysis. The material impacts, risks and opportunities related to the conduct - rules and other non-compliance risk topics are presented below in the section: Management of impacts, risks, opportunities (IRO).

Principles: The principles in place to manage material impacts, risks and opportunities in business conduct and to manage non-compliance risk are described in the section: Business conduct policies and organisational culture (G1-1).

Actions: Actions to mitigate business conduct risks and other non-compliance risk issues are also described.

Metrics and targets: The following indicators were adopted for business conduct and other non-compliance risk topics:

- percentage of employees in positions most exposed to risk of corruption covered by training programmes on corruption and bribery;
- number of fines and penalties for violations of anti-corruption legislation.

The management of non-compliance risks is part of an overall risk management system that includes the identification and assessment of risks and a set of actions to be taken against the identified risks.

Impacts, risks and opportunities management (IRO)

As a result of the double materiality assessment described in the part General Information (ESRS 2) in the section: Description of the processes for identifying and assessing material impacts, risks and opportunities (IRO-1) we identified a number of material IROs related to business conduct.

Table 158. Summary of the links between material IROs and policies, activities, metrics and targets

Category	Material IRO	Policies, principles	Actions	Metrics	Targets
Impacts	Legal and reputational risks associated with corruption or influence peddling	<ul style="list-style-type: none"> • Counteracting Money Laundering and Terrorist Financing Programme • Policy on reporting suspected irregularities • Gift policy • Anti-corruption policy • Conflict of interest management policy • Code of Conduct 	<ul style="list-style-type: none"> • Know Your Customer (KYC) process • Counteracting money laundering and terrorist financing / monitoring activity • Reporting of suspicious transactions • Negative information • Business relationship review • Transaction control 	<ul style="list-style-type: none"> • Percentage of people in positions most exposed to risk of corruption covered by training programmes on corruption and bribery • Number of fines and penalties for violations of anti-corruption regulations 	N/A
Risks	Legal risks associated with not identifying suspicious Customers' activity	<ul style="list-style-type: none"> • Counteracting Money Laundering and Terrorist Financing Programme • Sanctions and Embargoes Transaction Verification Rules • BNP Paribas Customer Acceptance Policy (KYC Policy) • Financial Markets Transparency Policy 	<ul style="list-style-type: none"> • Know Your Customer (KYC) process • Counteracting money laundering and terrorist financing / monitoring activity • Reporting of suspicious transactions • Negative information • Business relationship review 	N/A	N/A



Business conduct policies and corporate culture (G1-1)

The table below sets out the main policies for managing the impacts, risks and opportunities of the business conduct.

Table 159. Policies adopted regarding business conduct

Policy	Description of policy content	The scope of the policy and its possible exclusions	The most senior level in the undertaking's organisation that is accountable for the implementation	Interaction with stakeholders
Code of Conduct	The Code of Conduct guides the actions of all individuals at all levels of the organisation. Accordingly, all internal policies and procedures in the Group are aligned with the Code where necessary. It consists of three parts: <ul style="list-style-type: none"> • Mission and Values: helps to guide and inspire behaviour; • Rules of conduct to be shared and applied Code of Conduct - provides useful guidance on how to apply the principles of conduct.	BNP Paribas Group	the BNP Paribas Group's Management Board President	No interaction The Code of Conduct is available via the Bank's intranet and website . It is available in Polish and English versions
BNP Paribas Bank Polska S.A. Group Policy on Counteracting Money Laundering and Terrorist Financing	The Policy is the foundation on which the Group's anti-money laundering and counter-terrorist financing activities are based.	Group	Management Board	No interaction
Whistleblowing policy in BNP Paribas	The Policy specifies the system implemented in the Group to enable Employees and third parties to report, in full security and in accordance with the conditions defined by the regulations, any breach or suspected breach of the law or the Group's Code of Conduct.	Group	Management Board	Availability of dedicated channels
Gift Policy	This Policy sets out the rules that Employees must follow regarding gifts and invitations	Group	Management Board	Clause in agreements with contractors on Anti-Corruption Principles
Anti-Corruption Policy	This Policy sets out the expectations of the Management Board of all employees, who must actively participate in the fight against corruption in order to prevent and detect corruption.	Group	Management Board	No interaction
Conflict of Interest Management Policy	The Policy aims to: clarify the subject of conflicts of interest in the context of the Group's activities and more generally in the business context; outline the Group's rules for identifying, preventing and managing situations of conflict of interest.	Group	Management Board	No interaction
Policy on Verification of Transactions under Sanctions and Embargoes	The Policy sets out standards, internal processes and minimum controls to mitigate BNPP's exposure to the risks associated with breaches of financial sanctions laws and regulatory requirements and the risks associated with business relationships with sanctioned parties.	Bank*	Management Board	No interaction
BNP Paribas Customer Acceptance Policy (KYC Policy)	The Policy defines the principles of Know Your Customer, determines how the risk of money laundering and terrorist financing (ML/FT) is managed and contains the responsibilities regarding financial security measures towards the Bank's Customers.	Bank*	Management Board	Onboarding Customers



Policy	Description of policy content	The scope of the policy and its possible exclusions	The most senior level in the undertaking's organisation that is accountable for the implementation	Interaction with stakeholders
Market Integrity Policy	<p>The Policy is a reference for market transparency. It addresses various regulatory issues, in particular :</p> <ul style="list-style-type: none"> • issues related to market abuse • issues related to conflicts of interest, • MiFID II market integrity requirements, • benchmark regulation and IOSCO principles, • FX market rules (Global Code of Conduct for the FX market), rules on transparency (crossing thresholds) and short selling). 	BNP Paribas Group	Management Board	No interaction

* regulation appropriately implemented in Group subsidiaries in accordance with the principle of proportionality

Described policies are subject to a monitoring process, as defined in the Governance chapter in the: Internal control system (including a risk control and management system for the financial reporting process) section.

Adherence to the highest ethical standards is a requirement for all Group companies. All Group employees are obliged to strictly comply with the laws, directives and regulations applicable in all areas, as well as with the professional standards and internal regulations that apply to their activities. In the event of a potential discrepancy between the country's legislation and BNP Paribas' ethical principles, employees are required to comply with the applicable Polish legislation if it is more restrictive, while seeking ways to apply and comply with internal ethical principles.

Compliance with these principles, as detailed in the BNP Paribas Group Code of Conduct, is key to maintaining the Group's reputation and the trust placed in it by its Customers and business partners.

Code of Conduct

The Code of Conduct, which applies to all employees and all business lines, sets the direction for employees and guides decisions at all levels of the organisation.

In accordance with the BNP Paribas Group Code of Conduct, the Bank requires its employees to comply with specify standards of conduct in the performance of their duties. For this purpose, mandatory training courses are made available to all employees or to a dedicated group of employees as appropriate. Described in more detail in the section: [Training and skills development metrics \(S1-13\)](#)

In accordance with the 'Zero Tolerance to Fraud' principle, whenever an event is discovered that fulfils the characteristics of a breach, including fraud, regardless of the form in which it was committed, the extent of the financial loss or lack of loss, the Bank shall, with due diligence, take all measures to identify those responsible, their mechanisms of action, facts of the event and, if justified, apply sanctions, introduce corrective or preventive measures.

All employees are assigned a target: Compliance with the principles described in the Code of Conduct, which is assessed during the annual appraisal process. The task of the Committee for Continuous Employee Assessment in BNP Paribas Bank Polska S.A. is to analyse the assessment of each employee who does not comply with the compliance requirements (target: 'Adherence to the principles described in the Code of Conduct') and the employee's risk behaviour (target: 'Risk assessment and management'). In line with the principle of proportionality, in the smaller Group subsidiaries the above objectives are performed by a designated Conduct Officer.

The Disciplinary Committee decides on the application and type of disciplinary sanctions against the Bank's employees involved in the case of violation and other necessary actions related to the violation.

Furthermore, the Bank has an **Ethics and Standards of Conduct Committee**, the purpose of which is to initiate and monitor in initiatives aimed at popularising rules of conduct in all units in compliance with the Code of Conduct and to make appropriate recommendations. The Committee's meetings present key indicators (KPIs) related to compliance with the Code of Conduct, as well as an assessment of the risks associated with the Standards of Conduct and the degree of implementation of projects relating to these topics. At the Committee meetings, with the participation of the Management Board, final decisions are taken on the recommendations presented, approving management information on conduct, and approving solutions and resources appropriate to the scale and complexity of the business to effectively manage the Bank's activities.

The Code of Conduct includes:

- a section on mission and values to help create a positive impact and promote BNP Paribas' corporate culture;
- a section on the principles of conduct to be followed and applied in various areas, such as:
 - Customer interests,



- financial security,
- compliance with market standards (market integrity),
- conflicts of interest,
- professional ethics,
- respect for colleagues,
- protection of the Group,
- commitment to society;
- „Code of Conduct in Practice’, which provides useful guidance on the application of rules of conduct, in terms of:
 - decision-making,,
 - compliance with local and international laws,
 - reporting opinions and raising concerns,
 - additional responsibilities of managers;
- „Code of Conduct - Anti-Corruption“.

A survey of Group employees carried out at the end of 2023 confirmed a high level of commitment to the values and behaviours defined in the Code of Conduct, as well as a good knowledge of the channels for whistleblowing (see below, section: Whistleblowing system).

Conduct risk management (Conduct)

All issues covered by the Code of Conduct are subject to policies and procedures that set out principles and processes specific to each type of risk.

The policies and processes are part of the overall internal control system, which defines in particular the rules of risk assessment, control, detection and handling of incidents, monitoring of corrective actions and communication of management information. More information in chapter: Risks and opportunities, section: Control and monitoring of operational risks.

Anti-Corruption, Anti-Money Laundering and Countering the Financing of Terrorism

The Group maintains systems to detect money laundering and terrorist financing operations, which are based on a set of standards and controls and on the vigilance of employees, maintained through mandatory training programmes.

A system for the prevention and detection of corruption and influence peddling has also been formalised and implemented. More information below in the section: Prevention and detection of corruption and bribery (G1-3)

Respect for market integrity

The Group's market activities, on behalf of Customers or for its own account, are subject to strict mechanisms for the prevention and detection of market abuse and the management of confidential information and conflicts of interest.

Countering tax avoidance and evasion

Comprehensive compliance with tax obligations is part of the Group's commitments to economic and social responsibility. In this context, policies and procedures have been implemented to ensure compliance with the applicable tax law requirements.

The Group endeavours to ensure the tax compliance of its Customers: including ensuring the correct application of all regulations governing the withholding of taxes at source, as well as the remittance of these taxes to the competent tax authorities.

In addition, the Group fulfils its obligations to provide information of a tax nature to public authorities, both through automated processes and at the request of the authorities, while ensuring that the data provided is as comprehensive and of high quality as possible.

Protection of Customers' interests

Protecting Customers' interests is a priority for the Group. For this reason, it has decided to place this topic among the most important issues in the Code of Conduct by also establishing a dedicated expertise area as part of the Compliance function. More information in the part: Consumers and end users, section: [Policies related to consumers and end-users \(S4-1\)](#)

Whistleblowing system

The Whistleblowing System is governed by relevant policies and procedures adapted to Polish legal requirements, as well as to the BNP Paribas Group's standards under the French Sapin II act on combating corruption and business transparency.

All employees are required to be familiar with and comply with relevant laws, rules, internal regulations and professional standards in all areas of the Bank's activities. Any irregularities identified by employees should be reported.

The whistleblowing system is also open to external parties, in particular former employees, suppliers and their subcontractors, for information obtained during their activities for the Group.

The issues that can be reported include, but are not limited to, the following areas:

- acts of corruption and paid patronage or any offence which undermines integrity,
- cases of fraud,



- behaviour contrary to the rules on respect for persons (sexual and moral harassment, discrimination, aggression, violence, acts of sexism),
- breaches of professional ethics,
- breaches of financial security rules,
- anti-competitive practices,
- violations of market integrity,
- violations of rules protecting Customers' interests,
- unauthorised disclosure of confidential information, theft or leakage of data,
- violations of human rights and fundamental freedoms, of the health and safety of persons or of the environment, committed by a Group entity, supplier or sub-contractor to a supplier, in the context of a business relationship established with the Group or one of its entities,
- violations of the Group's policy on suppliers,
- breaches of the Group's policy on the use of social networks.

The whistleblowing regulations set out the reporting channels available to employees and external third parties, the immediate timeframes for processing reports, the processing methods and the protection guaranteed to whistleblowers against possible retaliation.

Independent and secure communication channels available to employees and external third parties

The Whistleblowing process is regulated by the Whistleblowing Policy in BNP Paribas Bank Polska S.A., which is designed to protect the interests of the Bank, employees, Customers, third parties and to monitor compliance with the law. It defines, among other things, the communication channels through which potential violations can be reported. The Whistleblower Policy at BNP Paribas Bank Polska implementing the provisions of the Whistleblower Protection Act was updated in September 2024.

The Bank has appointed dedicated Whistleblowing Referents who, while respecting the principles of confidentiality, ensure impartiality, independence and promptness in the investigation of each report.

Whistleblower protection

The Bank gives whistleblowers the opportunity to report suspected violations without fear of retaliation. Any retaliation e.g. dismissal, discrimination, in particular with regard to recruitment, remuneration, promotion, training will be treated as a breach of this policy. The same protection applies to employees who provided information in the course of the investigation, persons who assisted in making the report, persons associated with the whistleblower.

The whistleblowing system ensures the confidentiality of the identity of the whistleblower and the persons named in the report, including the persons affected by the report, as well as the information collected in the report and during the investigation.

Authorised persons are responsible for the implementation of the protection rules, as well as for their compliance with the rules applicable to the processing, recording and storage of personal data reported by the whistleblower.

Alerting support

Whistleblowing Referents are responsible for receiving reports, overseeing follow-up. These actions take place promptly and with due diligence and impartiality. The processing of whistleblowing reports at every stage is subject to identity protection and confidentiality.

The analysis of the admissibility of the report is carried out on the basis of the facts and documents provided in the report. In the event of a positive preliminary diagnosis, an investigation is carried out. The notification is analysed and investigated independently using expert knowledge. Notified violations are verified within strict deadlines. The whistleblower is informed at each stage of the process of the analysed case (i.e. acknowledgement of receipt of the notification, preliminary result of the admissibility analysis or closure of the case after its analysis), unless there is a justified obstacle in sending the information, e.g. an anonymous notification was made without providing a contact address for the whistleblower.

Raising employee awareness

All Group employees are informed about the Code of Conduct and the whistleblowing system as part of mandatory training.

The rules relating to the whistleblowing system and how to use it are also communicated on the Bank's website and intranet pages.

Control

An internal control system is in place to verify that, i.a. only authorised persons have access to reported violations and that the verification of reports is carried out in accordance with the applicable regulations.

A report on the adequacy and effectiveness of the Whistleblowing policy is submitted annually to the Management Board and Supervisory Board. In 2024, 12 alerts were reported through the Bank's Whistleblowing channels.

Trainings

All topics covered in the Code of Conduct are integrated into a training course called Conduct Journey. It is regularly updated and enriched in terms of topics on whistleblowing channels, diversity, equality and inclusion. The course was last updated in 2023. The training develops the core principles outlined in the Code of Conduct, discusses expected employee behaviour and addresses the issue of detecting and preventing abuse..



New employees, upon joining the Group, are systematically enrolled in financial security training (Know Your Customer, anti-money laundering, terrorist financing, international sanctions and embargoes).

Employees who are particularly exposed to certain risks receive advanced training.

Management Board members also participate in the Conduct Journey programme or safety training.

Table 160. 'Conduct Journey' training for employees and managers on anti-corruption policies and procedures in 2024

Type of training	'Conduct Journey' on conduct - 2024 Edition	(Compliance) - anti-bribery and corruption - most exposed employees
Number of employees attending training	7,119	493
Type of training	e-learning training	e-learning training
Duration	1,5 h. (7 x 15-min. modules)	40 minutes
Frequency	every year	every two years
Completion rate in 2024	99.7%	96.8%

Statistics include the Conduct Journey training - 2024 Edition. Some employees who were hired at the Bank in the first half of the year in the first instance were required to undergo conduct ethics training, which included a module entitled 'Fighting corruption' covering the anti-corruption aspect. The figure has been adjusted to take into account employees on long-term leave.

Prevention and detection of corruption and bribery (G1-3)

The Bank has implemented standards for the prevention and detection of corruption and bribery. The standards have been developed taking into account the requirements of Polish law and extraterritorial regulations (the French 'Sapin II' Act, the UK Bribery Act and the US Foreign Corrupt Practices Act). The anti-corruption standards are included in the 'Anti-Corruption Policy' and are updated taking into account the results of the corruption risk assessment. The regulation provides guidelines for the identification and mitigation of corruption risks and defines the main principles of conduct and responsibilities in this area. With the adoption of the aforementioned regulation, all incidents that are - even potentially - corrupt in nature are monitored.

The ABC (Anti-Bribery and Corruption) standards are maintained by:

- Anti-corruption statement by the BNP Paribas Group CEO confirming BNP Paribas' zero tolerance for corruption and influence peddling.
- Governance: overseen by a dedicated Compliance Team responsible for designing and coordinating ABC standards and overseeing a network of so-called ABC Correspondents present across business lines and functions.
- Corruption risk assessment: corruption risks are regularly assessed and the results of the risk assessment are presented to the Management Board. The risk assessment methodology allows for a detailed assessment of corruption risks based

on scenarios assessed by the business lines and functions and their prioritisation (through risk factors), as well as action plans to counter corruption risks.

- The Group's Code of Conduct, which includes the appendix 'Code of Conduct - Anti-Corruption' and examples of prohibited situations or those that should come to the attention of employees if encountered. Policies related to the Code of Conduct are also available, such as those on gifts and invitations, lobbying, conflicts of interest, philanthropy and sponsorship, providing guidance to employees on how to ensure that these issues address corruption risks.
- Whistleblowing standards: Group employees have access to whistleblowing channels to report any violations of the 'Code of Conduct - Anti-Corruption'.
- Due diligence processes: the Bank's standards set out due diligence requirements for Customers (including politically exposed persons), intermediaries, suppliers and other types of third parties. This enables the identification and management of counterparties most exposed to particular corruption risks (such relationships are subject to specific risk mitigation measures). A tool for analysing adverse information related to third parties has also been implemented.
- Control mechanisms to manage corruption risks: the Bank's control framework is organised around 3 lines of defence, with the business units responsible for first-line controls, the second line of defence is carried out by units such as compliance, risk, finance, and audit is the third line of defence with periodic audits, including on ABC. An anti-corruption (including financial) internal control system is in place to mitigate the risk of corruption. Analysis of corruption-related operational events is carried out quarterly and the results are included in the risk assessment. All these control functions and key metrics enable ABC standards to be monitored and negative results to be addressed with recommendations or an action plan.
- Training and communication: (see below: Training).
- Disciplinary system: any suspected corruption involving a Bank employee is analysed and appropriate disciplinary sanctions are imposed if violations are confirmed.

The Bank continuously evaluates the management and control system (procedures, reporting, controls, training) implemented to counteract corruption. Appropriate internal regulations in this regard are implemented and updated on an ongoing basis. Central oversight is given to the creation of corruption risk maps and the analysis of corruption-related information from reporting. The Managing Director of the Compliance Division appoints persons to act as ABC Correspondents, whose tasks include coordinating anti-corruption activities. In the event of suspected corrupt activities, an independent anti-fraud unit conducts an investigation. As part of its anti-corruption efforts, the Bank monitors metrics such as reported cases of fraud, identified conflicts of interest, gifts and invitations accepted/transmitted, due diligence in establishing relationships with Customers/contractors/intermediaries, and the level of employee awareness. IT solutions have also been prepared to enable more effective monitoring of key corruption indicators.

We expect our business partners (suppliers, counterparties, contractors working with the Bank and its Customers on behalf of the Bank) to act in accordance with the principles set out in the Group's Code of Conduct. An ethics and anti-corruption clause is an integral part of every contract the Bank enters into with its suppliers and business partners.

Applicable policies in the area of anti-corruption are listed above in the table 159 Policies adopted for business operations.



Trainings

The anti-corruption process must be known and understood by all Bank employees. For this purpose, appropriate training is provided that is accessible to all employees and there is regular internal communication in this regard.

We have implemented mandatory Code of Conduct training for all employees, one module of which is dedicated to the topic of anti-corruption. All Group employees must receive training on corruption and influence peddling as part of the Conduct Journey training.

Employees most exposed to risk of corruption must also participate in specialised training, adapted to their specific activities, throughout the period in which they hold these positions. Positions are identified by taking into account risk mapping (those working with third parties or performing high-risk activities and by identifying those responsible for implementing the anti-corruption system. Among those most at risk of corruption, the Bank has included employees involved in sales, purchasing, recruitment, real estate processes. ABC Correspondents, auditors, senior managers, Whistleblowing Correspondents are also subject to extended anti-corruption training due to their functions..

The ABC Correspondents prepare training courses and workshops dedicated to specific units of the Bank.

In addition, the Bank has a dedicated intranet page where the anti-corruption system is described.

Metrics and targets

Confirmed incidents of corruption or bribery (G1-4)

Neither the Bank nor any Group entity has been convicted or fined for breaches of anti-corruption or anti-bribery legislation in the last five years.

No confirmed cases of corruption or bribery have been identified between 1 January and 31 December 2024.

All reports of violations of anti-corruption procedures and standards are promptly investigated by an independent, non-involved entity and are then included in the overall analysis of the anti-corruption system in order to identify possible corrective actions at a systemic level. See Prevention and detection of corruption and bribery (G1-3). Members of the Management Board and Supervisory Board are informed of reported cases of corruption or bribery.



Additional information on the entity

Market integrity

General information

Open and transparent markets are essential for economic development. The Bank is committed to helping maintain and preserve and transparency in financial markets. We define it as the need to ensure the fair and safe functioning of markets in order to instil the widest possible confidence in them and promote high levels of savings and investment.

The framework for ensuring market integrity has been developed in strict compliance with regulations and is based on the following pillars:

- operational policies and procedures;
- IT tools;
- specialised teams of staff;
- an independent internal control and audit system;
- a continuing education programme.
- It consists of two main activities:
 - management of inside information and conflicts of interest;
 - monitoring capital markets transactions and contributing to the smooth functioning and transparency of the markets.

Governance

Policies and processes

The Bank has the Market Integrity Protection Policy, which is a set of key provisions on the principles of financial market transparency. It also defines the rules and controls to prevent and detect market abuse and addresses the detection and management of conflict of interest situations. The policy defines key roles in the processes related to the prevention of market abuse and is based on the market abuse regulations (MAR Regulation) as well as selected aspects of the MIFID requirements.

The policy addresses issues such as detection and prevention of market abuse (price manipulation, benchmark or insider trading), management of inside information, management of conflicts of interest, rules on benchmarks, as well as rules of conduct in the foreign exchange market.

Management of inside information and prevention of conflicts of interest

The Bank and the Group comply with the applicable laws and regulations, both at European and international level, as well as with the best practices and recommendations of the competent national authorities regarding the protection of inside information.

Accordingly, the Bank ensures that inside information is properly processed and circulated and that an internal mechanism is in place to determine the nature of this information and to decide when it is made public.

Inside information, as well as persons with access to inside information, is subject to registration. Administrative and organisational arrangements such as information barriers and organisational separation of banking activities (such as investment banking, proprietary trading and asset management) are maintained to guarantee the confidentiality of inside information and prevent its use.

In addition, the Bank has implemented a system to prevent and manage conflicts of interest and, where applicable, transactional conflicts of interest, while detecting or appropriately managing situations of conflict of interest related to market activities.

We have a process in place at the Bank to detect and manage situations of potential conflict of interest involving BNP Paribas Group entities by maintaining and managing lists of issuers or Customers.

All people with access to inside information are required to comply with rules of conduct, an essential element of which is the proper management of inside information and information relating to situations of conflict of interest.

Management of impacts, risks and opportunities (IRO)

Monitoring transactions and contributing to the proper functioning and transparency of the markets

In order to protect the markets integrity, the dissemination or misuse of insider information, we have put in place an internal system to prevent market abuse. This system prevents, supports the detection and reporting of market abuse. In particular, it prevents insider trading, price manipulation and the disclosure of information regarding brokerage orders or transactions placed by Customers or by the Bank (when acting on its own account, as a counterparty).

Detected orders or transactions that may constitute market abuse are the subject of a declaration (STOR 'Suspicious Transaction Order Report') to the relevant regulatory authority (authorities).

The Bank monitors transaction orders in relation to all brokerage activities and also fulfils obligations regarding pre- and post-trade transparency and the submission of declarations regarding transactions involving the financial instruments it executes.



In addition, in certain business areas, the Bank has implemented monitoring of recordings of voice and electronic communications, in accordance with the regulations and guidelines of the Regulator.

Incidents

As part of the Markets Transparency Protection Policy, the Bank has a process in place to identify incidents of non-compliance, including breaches that could develop into market abuse. Reporting under this process takes place quarterly and concerns identified market abuse for personal transactions in financial instruments and market abuse (for inside information or suspicious transactions and orders).

Reporting path and systems

Reporting to the Bank's Management Board, Audit Committee and Supervisory Board takes place periodically as part of the compliance function's management information and reporting system.

Financial market abuse is reported to the Financial Supervisory Authority in reports of suspicious transactions and orders (STOR reports).

The Bank uses IT systems to identify potential fraud for personal transactions or financial market abuse, mechanisms to manage confidential information and solutions to identify and manage situations of conflict of interest.

Trainings

Employees complete mandatory e-learning training, regarding market abuse and personal transactions, which covers topics related to the transparency of financial markets.

In addition, for selected employees of the Ethics and Market Transparency Team who perform tasks strictly related to countering price manipulation, metrics or insider trading, additional, more detailed training is provided on topics in the area of market transparency.

Financial security

General information

BNP Paribas Bank Polska S.A., as part of the BNP Paribas Group, is obliged to comply with international sanctions and to combat money laundering, terrorist financing and corruption. The BNP Paribas Bank Polska Group has implemented, in line with the scope of its activities in the companies, procedures governing the area of financial security. Through internal policies, it implements legal requirements, recommendations and guidelines of regulators, and seeks to minimise risks related to money laundering and terrorist financing. Constantly adapts to the changing business and regulatory environment by systematically reviewing market trends, changes in Customer assessment profiles and transactions. Takes into account new developments leading to the introduction of funds from illegal sources into financial circulation. Adapts internal rules for the operation and prevention of such phenomena to these events, implementing more modern solutions and improving existing tools. One of the objectives of the policies is to ensure the highest level of knowledge of all those

involved in the prevention of money laundering and terrorist financing through continuous training, which in the long term will translate into an increased level of financial security for the Bank and the Group.

Governance

In pursuit of the above commitments, the Bank implements and continuously updates its financial security policies, which consist of:

- Know Your Customer Policy (KYC),
- Anti-Money Laundering and Countering the Financing of Terrorism Programme,
- Policy on the application of international sanctions,

Know Your Customer Policy (KYC)

The Bank has implemented a Customer Acceptance Policy in BNP Paribas Bank Polska S.A. ("KYC Policy"), Know Your Intermediary Policy ("KYI Policy"), the Know Your Supplier Policy ("KYS Policy"), the Policy on relationships with categories of persons or entities other than those indicated above ("KYX Policy").

The purpose of these policies is to implement the necessary arrangements to ensure that the Bank avoids entering into business relationships with individuals and entities that are involved in suspicious, illegal or unethical activities. The primary purpose of the policies is to protect the reputation and good name of the Bank, to set standards of due diligence in relation to knowledge of the Customer, supplier, intermediary and any other uncategorised relationship, by setting the scope for applying financial security measures, assessing the risk of money laundering and terrorist financing and deciding whether to establish or continue a relationship with these entities. This is an essential component of the AML/CFT process and compliance with international financial sanctions.

Besides financial security risks, these policies help to assess and manage other risks related to the Bank's relationships with third parties, such as market integrity, protection of Customer interests, reputation and ESG risks.

The Bank's Customer Acceptance Policy fulfils the obligation to apply the financial security measures set out in the Act of 1 March 2018 on the prevention of money laundering and terrorist financing. It covers with its scope the principles concerning:

- identification, verification and updating of information on the identity of Customers;
- Identification of the beneficial owner and the actions taken in connection with the need to establish the identity of the beneficial owner and, in the case of legal persons, to establish the ownership and control structure of the Customer;
- Identify other related persons, including those acting on behalf of and for the Customer;
- Understand and obtain information on the topic of the purpose and intended nature of the business relationship;



- Conduct continuous monitoring of the business relationship and control of transactions undertaken during the course of the relationship to ensure that the transactions carried out are consistent with the Bank's knowledge of the Customer, its business and risk profile, including, where necessary, the source of funds;
- the application of enhanced due diligence in relation to high-risk Customers, politically exposed persons, correspondent banking and situations of increased risk (connection to a high-risk third country, corruption risk, etc.);
- factors taken into account in the Customer risk assessment process.

The KYC policy defines the scope of information collected and analysed for each type of Customer (individuals, corporations, financial institutions, public entities, etc.). It describes the methodology used to determine the due diligence measures to be applied, using a risk-based approach in line with applicable legislation and the recommendations of The Financial Action Task Force (FATF). It also defines the roles and responsibilities of the various teams involved in the KYC process, from data collection to compliance checks on internal procedures.

The KYI, KYS, KYX policies set out similar precautions to be taken, in line with a risk-based approach, for intermediaries, suppliers and other parties who are not Customers, intermediaries or suppliers (e.g. beneficiaries of donations, participants in trade finance transactions, etc.)

Anti-money laundering and counter-terrorist financing programme

The Bank has an Anti-Money Laundering and Counteracting the Financing of Terrorism Programme in place.

The Programme is a strategic document indicating the course of action followed by the Bank as an obliged institution in the implementation of its obligations under the Act of 1 March 2018 on counteracting money laundering and terrorist financing. The main objectives are to reduce the Bank's exposure to money laundering and terrorist financing risks by implementing top-quality solutions and improvements to mitigate these risks.

The programme includes i.a.:

- a description of the activities or actions taken to mitigate the risks of money laundering and terrorist financing and to properly manage the identified risks of money laundering or terrorist financing;
- principles for identifying and assessing the risk of money laundering and terrorist financing associated with the business relationship concerned, including principles for verifying and updating the prior assessment of the risk of money laundering and terrorist financing;
- measures applied to properly manage the identified risks of money laundering or terrorist financing associated with the business relationship concerned;
- rules on the application of financial security measures;
- rules on record keeping and information;

- Principles for fulfilling obligations involving the transmission of transaction data and notifications to the General Inspector of Financial Information;
- Principles for the dissemination of knowledge of the provisions of the Anti-Money Laundering Act and the Financing of Terrorism among employees;
- Principles of reporting by employees or other persons performing activities for the Bank, actual or potential violations of the AML and terrorist financing provisions;
- principles of internal control or supervision of the Bank's compliance with the AML and terrorist financing regulations and the rules of conduct set out in the internal procedure;
- rules for noting discrepancies between the information gathered in the Central Register of Beneficial Owners and the information on the Customer's beneficial owners;
- Principles for documenting the impediments identified in connection with the verification of the identity of the beneficial owner and the actions taken in connection with the identification as beneficial owner of an individual holding a senior management position;
- Means of designating the person responsible within the Bank for the implementation of the obligations set out in the aforementioned Act and the list of duties involved;
- Means of appointing the Programme Coordinator (AMLRO) and his/her tasks, as well as the identification of a replacement in case the Coordinator is unable to perform their tasks;
- the AMLRO responsibilities of all Bank employees.

Bank's international sanctions policy

We have developed a set of policies and procedures to ensure uniform standards in complying with international sanctions regulations. In particular, the policy adopted at the Bank, based on the relevant legislation and the Bank's internal risk assessment, is not to process or otherwise engage in activities or transactions, regardless of currency:

- for, on behalf of, or for the benefit of, directly or indirectly, individuals, entities or organisations subject to Polish, French, European Union or United States sanctions, as well as the United Nations or other applicable local sanctions authorities, or involving, directly or indirectly, countries or territories subject to comprehensive sanctions, including the Crimea/Sevastopol area, Ukraine's uncontrolled areas of Donetsk and Luhansk, Cuba, Iran, North Korea and Syria, or:
- in any way associated with persons, entities, organisations or territories that may be affiliated with or controlled by a terrorist organisation recognised as such by the relevant authorities in Poland, the European Union, the United States and the United Nations, USA:

It is the Bank's policy that when a country, territory or region with a high level of financial security risk is directly or indirectly involved (for example, AML/CFT risk, particularly based on FATF or European Union (EU) classifications,



corruption risk confirmed by the World Bank, risk of circumvention of sanctions, country/territory/region subject to targeted/sectoral sanctions, lack of cooperation with the EU on tax issues, economic instability, political instability, war, conflict, proliferation), the Bank may on a case-by-case basis and regardless of currency:

- refuse to enter into a relation,
- refuse to process certain transactions, or
- decide not to engage in certain activities or transactions.

In order to implement this policy, the Bank has implemented and is continuously improving tools to control the Bank's Customer database and to ensure the filtering of transactions in order to comply with legal requirements.

Impacts, risks and opportunities management

The risks associated with money laundering and terrorist financing, as well as the Bank's potential exposure to international sanctions, are constantly evolving. The Bank undertakes a number of measures in an effort to mitigate these risks and improve the security of the financial market. As part of the BNP Paribas Group, in addition to the requirements resulting directly from Polish law, it introduces restrictive rules to tighten the products and processes offered to its Customers. One of the factors mitigating risk exposure is training

Trainings

The Bank provides comprehensive training programmes for those performing AML/CFT duties. Training is divided into onboarding (prior to the commencement of official activities) and refreshed annually with knowledge updates. Training materials are provided through an e-learning platform, as well as in the form of meetings with staff responsible for implementing the Bank's financial security policies. Training aims to continuously improve the competencies of employees, thereby reducing the risks to which the Bank and the Group are exposed.

The Bank constantly updates its procedures and regulations, adapting them to the dynamic legal environment both on the side of national law and international standards. The constant strengthening of financial security avoids risk exposure and ensures regulatory compliance with the law.

Cybersecurity

General information

In the ever-changing landscape of the global financial industry, the BNP Paribas Bank Polska Group (the Group) recognizes the key role of cybersecurity in maintaining operational resilience. The Group faces a multitude of challenges in ensuring the security, confidentiality and integrity of its data, robustness and the resilience of its Information and Communications Technology (ICT) systems. The interconnected nature of operations, coupled with the rapid pace of technological advancement and the need to rely increasingly on third parties to deliver critical services, requires a strategic and adaptive approach to risk management. The Group is subject to cybersecurity risk, or risk caused by a malicious and/or fraudulent

act, committed virtually, with the intention of manipulating information (confidential data, bank/insurance, technical or strategic), processes and users, in order to cause material losses to the Group.

Regulatory authorities now consider cybercriminality to be a growing systemic risk for the financial sector. They have stressed the need for financial institutions to improve their resilience to cyber-attacks by strengthening internal IT monitoring and control procedures. A successful cyber-attack could therefore expose the Group to a regulatory fine, especially should any personal customer data be lost.

Risks associated with cyber-attack are currently one of the key elements which every organization needs to consider from perspective of its business model, operations and value chain. Every successful attack, system failures disruption of IT services, confidential data breaches impacting the Group or its vendors and partners, could lead to serious financial losses, penalties from supervisory authorities and have an adverse effect on reputation, operating results and financial position of the Group. During double materiality analysis process (DMA), cybersecurity risk was estimated on a medium level.

Governance

The Bank oversees cybersecurity through dedicated governance based upon developed and implemented procedures and policies on information technology and security of the ICT environment, originating from the objectives defined in the Bank's IT Strategy IT@Scale, local regulatory recommendations and legislation as well as the Group's standards. The strategy is periodically reviewed/updated, at least once a year and progress reported to the Bank's Management and Supervisory Boards. The current strategy covers the period 2022-2025. The risks associated with the activities carried out under the strategy are monitored, identified and mitigated.

In order to increase the effectiveness of the supervision and control of the ICT environment security, to ensure effective communication and compliance of its activities with the Bank's objectives and needs, a Security and **Business Continuity Management Committee** and an **IT Architecture Committee** were established with the Vice President in charge of New Technologies and Cybersecurity as chairman. The tasks of these committees include overseeing and controlling the security area of the ICT environment, ensuring effective communication, compliance with objectives and needs. The tasks and working procedures of these committees are regulated in dedicated rules of procedure. Relevant topics from an operational risk perspective are also presented at the **Internal Control Committee (ICC)**.

The Security and Business Continuity Management Division has been operating within the Bank's structure since September 2015. The activities of this Division are defined around key responsibilities:

- Secure Customer: secure service in digital channels, innovative and secure authentication and authorisation method. Continuous education of customers on secure banking.
- Secure Bank: continuous improvement of security infrastructure, effective vulnerability management and efficient incident response, building robust business continuity and crisis management plans fit for purpose, innovative approach to building employee awareness and competence.



- Compliance & innovation: full alignment with Group Cybersecurity Programme strengthening the Agile@Scale digitization programme and partnerships, extensive sector and cross-sector collaboration, secure use of Open-API collaboration, regulatory compliance.

The Managing Director of the Security and Business Continuity Management Division, Chief Security Officer (CSO), ensures that the management of cyber-security and information and communication technology (ICT) risks is integrated with local regulatory recommendations and legislation as well as the BNP Paribas Group's standards by ensuring that appropriate policies, practices and guidelines are in place. CSO is also responsible for the Bank's implementation of defined security requirements under Group Cybersecurity Programme and remediation projects to address cybersecurity risks.

Impacts, risks and opportunities management (IRO-1)

Table 161. Summary of the connections between relevant IROs and policies, measures, indicators and targets

Category	Material IROs	Policy	Actions	Metrics	Targets
Risks	Operational risk caused by cyber attacks	<ul style="list-style-type: none"> • Information Security Policy • ICT Security Policy 	<ul style="list-style-type: none"> • Framework requirements translated into action and action plans 	<ul style="list-style-type: none"> • Key Performance Indicators (KPIs) • BNP Paribas Group Cybersecurity Programme. • IT@Scale strategy 	<ul style="list-style-type: none"> • Target maturity broken down by entity within the BNP Paribas Group Cybersecurity Programme • Implementation of the IT@Scale strategy
	Reputational risks caused by cyber attacks				
	Legal risks caused by cyber attacks				

Policies and procedures related to cybersecurity area in the Bank

Table 162. Policies adopted in the course of business

Policy	Description of policy content	The scope of the policy and its possible exclusions	The most senior level in the undertaking's organisation that is accountable for the implementation	Interaction with stakeholders
Information Security Policy	The Policy defines the basic principles for ensuring the security of the Bank's tangible and intangible assets, including information assets, in order to provide high-quality, Customer-oriented services and maintain a high level of Customer confidence in the Bank.	Bank*	Bank's Management Board	Internal document
ICT Security Policy	Security framework for ICT and ICT-related risk management Consists of a set of documents (policies, recommendations and standards) that define the basic requirements for information security	Bank*	Bank's Management Board	Internal document

* The regulation has been implemented in the subsidiaries of the Group in accordance with the principle of proportionality

Within the Bank's ICT and cyber risk management reference framework, there is a specific framework for cybersecurity, composed of a set of documents (policies, procedures, processes and standards) that define the basic requirements for cybersecurity, offering a standardized approach to mitigating risks. Aligned with industry best practices. This ensures consistent implementation of processes and associated controls within the bank, strengthening the overall cybersecurity posture.

The Bank remains compliant with data protection regulations and principles i.e. the principles of GDPR are applied. The Bank has implemented the Personal Data Protection Policy, which ensures the management of confidential and sensitive information, the protection of personal data in accordance with current legislation and the recommendations of the competent authorities. The Bank has the Information Security Policy, certified by ISO 27001, the ICT Security Policy and the



Business Continuity Management Policy certified by ISO22301. Cybersecurity best practices are available to employees and regular awareness campaigns are performed.

The Bank has also implemented a procedure: Principles for Information Security and Cybersecurity Incident Management, which includes principles for dealing with incidents of security breaches of the IT environment, with a clear indication of the responsibilities of the various participants in the process.

As part of its business continuity management, the Bank has developed, implemented and periodically tests a number of different scenarios to which it may be exposed, assessing their potential impact on the continuity of business processes and services.

Metrics and targets

Targets

The Group applies the requirements defined in the cybersecurity objectives originating from the IT strategy of the Bank, binding regulations and standards as well as the BNP Paribas Group Cybersecurity Programme. A proactive approach is used as to ensure compliance with the cybersecurity objectives by efficiently allocated scope, applicability, timelines, necessary resources, including human, technological and budgetary resources. These proactive approach prioritize activities based in on risk level, regulatory mandates and operational objectives. This translates into concrete actions and initiatives. The sequence of activities is organised based on the level of risk, regulatory deadlines and operational objectives. Emphasis is placed on establishing clear responsibilities and due date for each task to ensure effective execution.

The progress in each cybersecurity objective is monitored within the bank in line with Bank's IT Strategy IT@Scale for 2022-2025, which identifies major objectives and specific quantified targets.

Metrics

In order to measure cybersecurity resilience, Key Performance Indicators (KPIs) have been implemented in the Bank.

Each year, the Safety and Business Continuity Management Division, under the BNP Paribas Group Cybersecurity Programme, take part in a couple of campaigns in order to assess compliance with the BNP Paribas Cybersecurity Programme objectives. The results are announced to management during meetings organized within Cybersecurity Panorama initiative in the BNP Paribas Group.

Progress of IT@Scale strategy implementation is regularly discussed by the Management Board and monitored by dedicated teams, which focus on presenting the progress of each initiative integrated into the strategy, supervision of KPIs delivery and assigned budget execution.

Moreover, the Group regularly conducts internal controls and audits in the area of implementation of requirements relating to IT governance, ICT risks, cybersecurity and ISO standards. These activities ensure compliance with legislation, standards

and recommendations of supervisors. Where areas of non-compliance are identified, recommendations are developed with an agreed pace of implementation.



Corporate governance

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Application of corporate governance principles in 2024

Legal and regulatory basis of corporate governance

Corporate governance defines the Bank's governance system, the organisation of the Bank, the powers, duties and responsibilities and the interrelationship between the Supervisory Board, the Management Board and the Bank's key functions, as well as the relationship with shareholders and Customers. In addition, it defines the functioning of internal supervision and key internal systems and functions. It ensures effective governance, efficient supervision, respect for shareholders' rights and transparent communication of the company with the market.

The corporate governance rules applied at BNP Paribas Bank Polska S.A. result from the provisions of the law (in particular the Code of Commercial Companies, the Banking Law and the regulations governing the functioning of the capital market) and the recommendations included in the documents: "Good Practices of Companies Listed on the WSE", "Corporate Governance Principles for Supervised Institutions", as well as Recommendation Z issued by the Polish Financial Supervision Authority, regarding internal governance rules in Banks.

In addition, the Bank is guided by internal regulations including the Bank's Statutes, the BNP Paribas Group Code of Conduct, adopted by Supervisory Board Resolution 48/2022 on 22 June 2022, and internal policies that reflect the regulatory requirements of corporate governance.

Pursuant to § 70, section 6, item 5) of the Minister of Finance Ordinance dated 29 March 2018 on current and periodic information disclosed by issuers of securities and conditions for recognising as equivalent information required by the laws of a non-member state (consolidated text, Journal of Laws of 2018, item 757), the Management Board of BNP Paribas Bank Polska S.A. presents the following information regarding the application of corporate governance principles in 2024.

The applicable set of corporate governance principles to which the Bank has been subject to

Corporate governance principles for supervised institutions

The Bank is subject to the "Corporate Governance Principles for Supervised Institutions" issued by the Financial Supervision Commission on 22 July 2014. This document sets out the internal and external relations of supervised

institutions, including relations with shareholders and Customers, their organisation, the functioning of internal supervision and key internal systems and functions, the functioning of statutory bodies and the principles of their interaction. These principles are available on the website of the Financial Supervision Commission at: https://www.knf.gov.pl/dla_rynku/regulacje_i_praktyka/zasady_ladu_korporacyjnyego.

„Corporate governance principles for supervised institutions" were adopted by the Bank's Management Board and Supervisory Board in December 2014 and the General Meeting in February 2015. The Bank's position on the application of the "Corporate Governance Principles for Supervised Institutions" was updated in 2022 and expressed in a Resolution of the Bank's Management Board dated 17 February 2022, subsequently confirmed by the Supervisory Board on 2 March 2022 and adopted by the General Meeting on 27 June 2022. It is posted on the Bank's website: <https://www.bnpparibas.pl/relacje-inwestorskie/lad-korporacyjny/zasady-ladu-korporacyjnego-knf>.

BNP Paribas Bank Polska S.A. declares that it has adopted and complies with all "Corporate Governance Principles for Supervised Institutions" issued by the Polish Financial Supervision Authority. BNP Paribas Bank Polska S.A. declares that it has adopted and complies with all the "Corporate Governance Principles for Supervised Institutions" issued by the Polish Financial Supervision Authority.

The Bank's annual statement on the application of the Corporate Governance Principles for Supervised Institutions is also included in the Supervisory Board's Activity Reports together with the assessments indicated in Principle 2.11 of the Code of Best Practice for WSE Listed Companies 2021 and the assessment of the Bank's compliance with the Corporate Governance Principles for Supervised Institutions issued by the Polish Financial Supervision Authority.

Of all the principles applied by the Bank, the following is how to implement a selection of those that are the most significant in terms of the Bank's mission and values, as well as those that are important to shareholders, Customers and business Partners.

Principles covered in Chapter 1 "Organisation and organisational structure"

Within the framework of the principles indicated in this chapter, the Bank pays particular attention to the implementation of the principles related to the adaptation of the organisational structure to the needs arising from the implementation of the strategic objectives, as well as to maintaining its transparency and accessibility. Also important from the point of view of the Bank's values is the functioning of an anonymous whistleblowing procedure for the Bank's authorities.

1. The Bank's organisation makes it possible to achieve long-term goals by, i.a., combining strategic planning with an analysis of the external environment, risk factors, macroeconomic forecasts and an analysis of internal factors and the Bank's situation, including its individual Areas. Strategic objectives take into account the nature and scale of the Bank's activities, action plans and business and financial objectives both at the Bank's scale and in the individual Areas. Organisational changes in the Bank are subordinate to the Bank's strategy and are an important tool for achieving both the business and financial objectives and other relevant objectives of the Bank's activities. In particular, organisational changes, reflecting the simplification of the management structure, make it possible to increase sales potential, improve information flow, manage processes and their quality more strongly and consistently, and increase employee involvement and development opportunities.

2. The Bank's relevant internal regulations govern management and control, internal reporting systems, the flow and protection of information and the circulation of documents. Changes in the external and internal environment are constantly monitored and analysed at the Bank, so that, i.a., through organisational changes, the Bank can respond flexibly to them, ensuring that the Bank is organised in a transparent manner, taking into account the size and profile of the risk and the nature and scale of its activities, and ensuring the achievement of the set objectives of its operations, the effective management of the Bank, the appropriate response to changing external conditions or sudden and unexpected events, and the effective flow and protection of information.

3. The organisational regulations reflect the organisational structure of the Bank. The Bank's organisational structure is part of the Bank's Organisational Regulations, the Head Office's organisational structure is an appendix to the Head Office Regulations, and the organisational charts of the units are an integral part of the regulations of these units. The organisational structure is



posted on the Bank's website <https://www.bnpparibas.pl/relacje-inwestorskie/lad-korporacyjny/struktura-organizacyjna>.

4. The internal rules, in particular the "Rules of Procedure for the Process of Organisational Change", shall ensure that the organisational structure is defined in such a way that there is no doubt as to the tasks and responsibilities of the respective organisational units, field units and posts or groups of posts, and in particular that there is no overlap of duties and responsibilities between organisational units, field units and posts or groups of posts.

5. All strategic objectives are set out in the Bank's GO beyond Strategy 2022-25 document, a public version of which is available on the Bank's website at the following address: <https://www.bnpparibas.pl/relacje-inwestorskie/o-banku/strategia-banku>.

6. The "Principles for the development, monitoring of the implementation and updating of the Bank's strategy" clearly describe the process for responding to situations where it is necessary to deviate from or is not possible to achieve the adopted strategic objectives. In addition, the Bank has detailed rules for managing emergency and crisis situations.

7. The "Employee Recruitment Policy at BNP Paribas Bank Polska S.A." and the "Policy for assessing the suitability of members of the Management Board and employees performing key functions in the Bank" ensure that persons suitable for the tasks defined in the Organisational Regulations are appointed to the positions.

8. The Bank's employees have access to the necessary regulations, made available on the intranet pages by the Internal Communications Team and in the IntraLex internal regulations database.

9. The Bank has a "Whistleblowing Policy". A whistleblower may report a suspected breach without fear of negative retaliation.

10. The Business Continuity Management System (BCMS) implemented and in operation at the Bank covers the areas in which the most important risks have been defined that may have a direct impact on the uninterrupted functioning of the Bank's critical processes. Appropriate actions are defined for these areas. In 2022, the Business Continuity Management System (BCMS) was audited for compliance with ISO 22301:2019. The Certificate obtained certifies the compliance of the implemented and functioning Business Continuity Management System with the requirements of ISO 22301.

Principles included in Chapter 2. "Relationship with shareholders of the supervised institution"

Within the framework of the principles set out in this chapter, the Bank shall, in particular, ensure an adequate flow of information between the supervised institution and the shareholders and, in accordance with the principles adopted for application, provide a basis for the shareholders' action.

1. The Bank's primary tool for communicating with shareholders is the Bank's website (investor relations sub-site): <https://www.bnpparibas.pl/relacje-inwestorskie> (English version: <https://www.bnpparibas.pl/investor-relations>). The other most frequently used tools of communication with analysts and investors are investor conferences (organised, among others, after the publication of quarterly financial results and thematic conferences), participation in conferences organised by capital market entities, meetings and one-on-one teleconferences. One of the most important objectives enshrined in the "Information Policy of BNP Paribas Bank Polska S.A." is to ensure equal access to information. In the case of decisions to be taken by the decision-making body (General Meeting of Shareholders), ensuring adequate access to information to shareholders is implemented (in addition to the actions and tools described above) through publication via current reports and the Bank's website of the contents of draft resolutions and documents to be discussed at the General Meeting, relevant to the resolutions to be taken, which have not been previously made public (including justifications to draft resolutions).

2. The interaction of shareholders and the rules of operation and the procedure of convening the General Meeting of Shareholders (GM) are governed by the Bank's Statute and the GM Regulations. In turn, the Rules of Participation in the General Meeting of BNP Paribas Bank Polska S.A. using electronic means of communication provide the basis for participation and voting in the General Meeting using electronic means of communication.

3. The Bank is obliged by the provisions of the Banking Act to maintain the equity of the supervised institution at an appropriate level. The Bank's strategic shareholder has also made such an investor commitment to the FSA to provide financial support when necessary to maintain an adequate level of capital and liquidity, including when the Bank's security requires it.

4. The principles and objectives of the Bank's dividend policy set out in the "Capital Management Policy at BNP Paribas Bank Polska S.A.", adopted by the Supervisory Board state, i.e., that: the general assumption of the Bank's dividend policy is to make stable dividend payments over a long period of time in

compliance with the principle of prudent management of the Bank and in line with the financial capacity of the Bank and the Group, determined, based on the adopted criteria; and that the dividend policy takes into account factors related to the Bank's and the Group's activity, in particular, the requirements and recommendations of the Supervisory Authorities with respect to capital adequacy. In particular, the Policy takes into account the positions issued by the Polish Financial Supervision Authority on the dividend policy of financial institutions, as well as taking into account the situation in the financial market, particularly in the context of the changing macroeconomic environment. The policy complies with the requirements of Recommendation Z issued by the FSC.

Principles covered in Chapter 3, "Governing Body"

With regard to the principles described in this chapter, the Bank attaches particular importance to the application of principles involving the safe and stable management of the Bank.

1. The security of the organisation is embedded in the strategy pursued by the governing body. The indicators that constitute the organisation's security regarding the level of capital or liquidity are included within the #Stronger pillar, GO beyond's strategy for 2022-25. In the long term, security is ensured through a policy of sustainable and high-quality growth, at the expense of its dynamism. This aims to limit the cost of credit risk, but also to minimise environmental, social or reputational risks that could generate deferred costs, translating into long-term stability and predictability. The members of the management body shall give assurance of the proper performance of the duties entrusted to them and, in particular, of their ability to manage the Bank's affairs in a prudent and stable manner. The objective of the Management Board is to ensure that the Bank is managed effectively and prudently.

2. The Management Board is responsible for the overall management of the Bank, including the making and implementation of decisions having as their object the resolution of matters of importance for the functioning of the Bank, the selection of objectives, ways and means of action, including the organisation of the Bank and its activities, the management of day-to-day operations, as well as the proper management of risks related to outsourced activities, including the activities referred to in Articles 5 and 6 of the Banking Act, the performance of which has been entrusted to external entities pursuant to Articles 6a-6d of the Banking Act, and the planning and control of the results achieved. Bearing in mind that the common objective of the Management Board and the Supervisory Board is to ensure the effective and prudent management of the Bank, the Management Board is in constant discussion with the Supervisory Board.



3. The division of powers of the Management Board is described in the Resolution on the internal division of powers in the Management Board of BNP Paribas Bank Polska S.A. and is reflected in the organisational structure.

4. Resolutions of the Management Board shall be adopted on all matters which, pursuant to the Bank's Statutes, generally applicable laws, supervisory recommendations and separate internal regulations of the Bank, require the collegial action of the Management Board. Meetings of the Bank's Management Board shall be held in Polish or, with the consent of all members of the Management Board present at the meeting, in English. A member of the Management Board who does not speak the language in which the meeting is held may be assisted by an interpreter.

5. The policy for assessing the suitability of members of the Bank's authorities includes, i.a., questionnaires for assessing the member of the Management Board also in terms of independence and absence of conflicts of interest as well as declarations that the function performed is the main area of professional activity of the member of the Management Board. This principle is adhered to and monitored, i.a., during the periodic assessment of the individual and collective suitability of members of the Bank's Management Board.

Principles covered in Chapter 4 "Supervisory authority"

With regard to the principles described in this chapter, the Bank draws attention in particular to the principles relating to the exercise of day-to-day oversight responsibilities by the Supervisory Board.

1. The Supervisory Board meetings are convened as and when required, but at least once in each quarter of the financial year. In 2024, there were 4 standing meetings of the Supervisory Board and 6 meetings of the Audit Committee. The Supervisory Board meetings are held in Polish or, with the consent of all Board members present at the meeting, in English.

2. In order to perform its duties, i.e. exercise constant supervision over the Bank's activities in all areas of its operations, the Supervisory Board has the right, in particular, to: examine all documents of the Bank, review the state of the Bank's assets, demand from the Management Board, proxies, persons employed in the Bank on the basis of an employment contract or performing certain activities for the Bank on a regular basis on the basis of a contract for specific work, a contract of mandate or another contract of a similar nature to prepare or submit any information, documents, reports or explanations concerning the Bank, in particular its activities or assets; the subject of the

demand may also be information, reports or explanations in the possession of an obliged body or person concerning the Bank's subsidiaries and affiliated companies.

3. The Supervisory Board shall provide information on the effectiveness of the supervision exercised, the manner in which the information requested from the Management Board is provided and its quality. The Supervisory Board shall report on the appointment of an advisor to examine a selected area of the Bank's activities. The information is included in the Annual Report of the Supervisory Board, which is submitted to the General Meeting of Shareholders.

The principles included in Chapter 5. "Remuneration Policy"

With regard to the principles described in this chapter, the Bank, among other things, draws attention to the principles related to the remuneration of persons with a significant impact on the risk profile.

1. Pursuant to the Remuneration Policy for the Supervisory Board Members of BNP Paribas Bank Polska S.A., the amount of remuneration of the Supervisory Board members is determined by the General Meeting of Shareholders. Remuneration of the members of the Supervisory Board is determined adequately to the function performed, as well as adequately to the scale of activity, complexity of the organisational structure and complexity of the Bank's activity.

2. Remuneration of members of the Management Board or persons performing key functions is governed by the "Remuneration Policy for Persons with a Significant Impact on the Risk Profile BNP Paribas Bank Polska S.A.", which has been introduced with a view to the need for a prudent, stable and effective management of the Bank's risk, capital and liquidity and with a particular focus on the long-term well-being of the Bank, the interests of the Bank's shareholders, investors and stakeholders, and the welfare of the Bank's Customers.

3. Pursuant to the "Remuneration Policy for Individuals with a Significant Impact on the Risk Profile of BNP Paribas Bank Polska S.A." the amount of Variable Remuneration is determined on the basis of the performance of the Bank as a whole, the performance of the organisational unit and individual performance, and is subject to change in line with changes in such performance. The Bank's performance taken to determine the amount of Performance-Based Variable Remuneration takes into account: revenue, operating expenses, the Bank's cost of risk, tax charges, cost-to-income ratio and return on capital, cost of capital and

liquidity risk over the long term. The assessment of performance is related to the degree to which the Bank's budget is met.

Principles included in Chapter 6, "Information Policy"

The principles described in this are implemented at the Bank primarily in accordance with the Information Policy of BNP Paribas Bank Polska SA.

1. Information Policy BNP Paribas Bank Polska S.A. regulates the issue of responsibility for contacts with particular stakeholder groups. It stipulates that the Bank, as a public company and a supervised institution, when providing information, is guided by the principles of corporate governance, in compliance with the applicable laws, including the requirements of the Banking Law, the Code of Commercial Companies, the Public Offering Act and the Trading in Financial Instruments Act, and, in particular, the Bank observes the principles of banking and professional secrecy and the principles of preventing the use and disclosure of confidential information. According to the Policy, the tasks of the Investor Relations Office are to ensure that the Bank's information obligations as a company listed on the Warsaw Stock Exchange (Giełda Papierów Wartościowych w Warszawie S.A.) are duly and timely fulfilled. An extract from the Information Policy is published on the Bank's website, in the Investor Relations section: <https://www.bnpparibas.pl/relacje-inwestorskie/lad-korporacyjny/polityka-informacyjna>.

Principles covered in Chapter 7. "Promotional activities and Customer relations"

With regard to the rules described in this chapter, in addition to the rules related to advertising messages, the Bank pays particular attention to the rules describing the process of offering financial products or services and the process of dealing with complaints.

1. The Bank has policies, procedures and instructions in place to ensure that the information provided by employees is reliable, clear and understandable to Customers. This principle is implemented by ensuring that employees adequately implement the adopted training paths and professional preparation necessary for their work, through the development of employees' competencies in accordance with the development programmes in force at the Bank, (initial training courses, individual development plans, mandatory training courses) and ensuring that employees are adequately prepared by implementing training programmes on the products offered (product training courses), as well as ensuring that employees are adequately prepared and certified as required by specific legislation, through the implementation of training courses that certify



and confirm knowledge (professional training courses for insurance distribution, training courses for employees providing information on investment services and products). In addition, the implementation of this principle is supported by the development of operational instructions and sales procedures that take into account the implementation of steps of providing complete and reliable information on the Bank's products and services, the provision of an accessible and up-to-date knowledge base on individual products and sales processes, and the inclusion, in the processes of creating new products, of an obligation to carry out training to familiarise employees with the nature of the newly introduced product.

2. Information on the complaint handling process is included in the General Terms and Conditions or in the contractual templates that the Bank enters into with Customers when establishing a relationship. Publicly available information is also included on the Bank's website at <https://www.bnpparibas.pl/repozytorium/reklamacje>

3. The Bank also has internal rules developed and in force describing the operation of the complaint handling process (including participating units) and the position of the Bank's Customer Ombudsman.

4. The Bank has implemented internal rules for the preparation of marketing communications to ensure their compliance with the adopted principles, including the "Rules for the creation of marketing materials at BNP Paribas Bank Polska S.A." and "Principles for acceptance of marketing materials and other communications to Customers".

Principles covered in Chapter 8, "Key internal systems and functions"

With regard to the principles described in this chapter, the Bank fully applies the regulations and market standards in force in this area, in particular giving importance to the functioning of the internal control system.

1. The Bank's internal control system is included in the framework of the so-called three lines of defence model and is adapted to the organisational structure. The Bank bases its internal control system on a set of control mechanisms ensuring the achievement of the objectives of the internal control system set out in Recommendation H (i.e. the effectiveness and efficiency of the Bank's operations, the reliability of financial reporting, compliance with the Bank's risk management principles, compliance of the Bank's operations with laws, internal regulations and market standards). The internal control system is governed by the "Principles of Internal Control". In addition, the Bank has

developed and adopted a "Compliance Risk Management Policy", defining the key areas identified with the aforementioned risk, as well as defining the responsibilities of the Bank's employees in managing this risk.

2. The Bank has an Internal Control Committee, whose main purpose is to support the Management Board in ensuring the proper functioning of the operational risk management system and the internal control system. The Committee brings together key representatives of the three lines of defence. An Audit Committee has been established within the Supervisory Board. Among its duties, it is responsible for performing supervisory activities over the activities of the Internal Audit Division.

3. The Bank shall annually select the essential processes based on the criteria adopted by the Bank and document a description of the link between the general objectives and the specific objectives of the internal control system identified within them and the essential processes and key controls, as well as the independent monitoring of compliance with these controls.

4. As part of its risk management system, the Bank has a fully harmonised operational and IT operating architecture. The Bank consistently develops and adapts the credit risk management system to changing requirements by developing and implementing internal regulations, processes, tools and systems. The Bank works on an ongoing basis to increase the efficiency and tooling of processes and applications used in the risk area. The Bank implements all internal audit, auditor and supervisor recommendations without delay.

5. The Bank's risk management system includes: the organisational structure, specifying the responsibilities and tasks of the bodies, committees and organisational units of the Bank's Head Office/the Bank's organisational units participating in the risk management system; and the policies and procedures setting out the detailed principles of risk identification, measurement, acceptance, control, monitoring and reporting, as well as the tools: the IT system, data warehouses, databases and IT applications supporting the risk management process.

6. Risk management at the Bank is carried out on the basis of the Bank's policies and other internal regulations on the identification, measurement, acceptance, control, monitoring and reporting of risks, approved by the relevant decision-makers, within the scope of their competence. Credit policies and procedures are reviewed periodically to adapt them to changes in the Bank's risk profile and the economic environment in which the Bank operates. The Bank's internal risk

management regulations take into account the regulatory requirements for the banking sector and the standards applicable to the BNP Paribas Group.

7. In accordance with the requirements set out in Article 9c(2)(2) of the Banking Law of 29 August 1997, the Bank has established and maintains a compliance function to identify, assess, control and monitor the risk of non-compliance of the Bank's activities with laws, internal regulations and market standards and to present reports in this respect (compliance).

8. The responsibility of the Bank's Management Board for ensuring an effective compliance system and the principles of organisation, scope of responsibility and mechanisms ensuring the independence and effectiveness of the compliance function (Compliance Division) are set out in the Regulations of the Minister of Finance, Funds and Regional Policy of 10 June 2021. on the risk management system and internal control system and remuneration policy in banks and Recommendation H of the Polish Financial Supervision Authority concerning the internal control system in banks, which have been appropriately implemented in the Bank's internal regulations, in particular in the Regulations on the operation of the Compliance Monitoring Unit and the Compliance Policy at BNP Paribas Bank Polska SA.

9. The internal control system includes an internal audit function as the 3rd line of defence to conduct an independent and objective examination and evaluation of the adequacy and effectiveness of the risk management system and the internal control system.

10. The Supervisory Board and the Bank's Management Board shall ensure that the Internal Audit Division has a status that guarantees autonomy, independence, impartiality and the budget and powers necessary to perform its tasks.

11. The Internal Audit function operates on the basis of the International Standards for the Professional Practice of Internal Auditing and the Code of Ethics as set out by The Institute of Internal Auditors (IIA), the standards developed by The Information Systems Audit and Control Association (ISACA) and the guidelines set out by the supervisory authorities.

The rules included in Chapter 9. "Exercise of rights from assets acquired at the Customer's risk"

The rules described in this chapter are implemented by BNP Paribas Bank Polska Brokerage based, i.a., on internal policies and procedures, in particular ensuring



the protection of Customers' interests, including on the basis of the provisions of the "Policy for acting in the best interest of the Customers of BNP Paribas Bank Polska S.A. regarding investment services and trading in financial instruments at the Brokerage Office" and the "Regulations for the provision of portfolio management services comprising one or more financial instruments by the Brokerage Office of BNP Paribas Bank Polska S.A. for Private Banking Customers".

Code of Best Practice for WSE Listed Companies

From 1 July 2021, new corporate governance rules came into force: "Good Practices of Companies Listed on the WSE 2021" ("Best Practices", "DPSN 2021"), adopted by the Exchange Board by Resolution No. 13/1834/2021 of 29 March 2021. They replaced the set of "Good Practices of Companies Listed on the WSE 2016".

The content of the Best Practices for WSE Listed Companies 2021 is available on the WSE's website at: <https://www.gpw.pl/dobre-praktyki>.

The Bank's Management Board, by Resolution 49/BZ/42/2021 of 30 July 2021, adopted for application the set of principles "Good Practices of Companies Listed on the WSE 2021". Subsequently, the Extraordinary General Meeting of the Bank, adopted for application the principles contained in the document "Good Practices of Companies Listed on the WSE 2021" By Resolution No. 3 of 4 January 2022.

As a listed company, the Bank is subject to the obligation to include in its annual report a statement on the application of corporate governance principles pursuant to the provisions of § 70(6)(5) of the Regulation of the Minister of Finance of 29 March 2018 on current and periodic information (...).

In addition, pursuant to § 29(3) of the WSE Rules and in accordance with the principles set out in the relevant resolutions of the WSE Management Board, the Bank is required to provide the Exchange, via the Electronic Information Base (EIB), with reports on the application of corporate governance principles.

Information on the application of the "Best Practices for WSE Listed Companies" including all EIB reports is available on the Bank's Investor Relations website (<https://www.bnpparibas.pl/relacje-inwestorskie/lad-korporacyjny/dobre-praktyki-spolek-notowanych-na-gpw>).

In order to allow investors and analysts to view companies' statements in various combinations and variants, a Best Practice Scanner has also been made

available on the Stock Exchange's website ([Główny Rynek GPW - Skaner Dobrych Praktyk](#)).

The status of application of the "Best Practices for Companies Listed on the WSE 2021" at the Bank is subject to constant review. As at the date of publication of this Report, the Bank applies all the principles set out in the Good Practices of Companies Listed on the WSE 2021.

The following is a description of the implementation of selected principles most relevant to the Bank's mission, the values by which the Bank is guided in its activities and of significant importance to shareholders and Customers.

1. INFORMATION POLICY AND COMMUNICATION WITH INVESTORS

1. The Management Board and the Corporate Communications Department are responsible for shaping and implementing the Bank's information policy. In turn, the Spokesperson and employees of the PR Team are responsible for cooperation and representing the Bank in its contacts with the media and opinion formers. In addition to the members of the Management Board, only the Press Officer and employees of the PR Team are authorised to officially present the Bank's position in the media. The Investor Relations Office is responsible for relations with shareholders, investors and other capital market participants, and the Bank's website (investor relations sub-site) is the primary communication tool: <https://www.bnpparibas.pl/relacje-inwestorskie> (English version: <https://www.bnpparibas.pl/investor-relations>).

2. The current operating strategy of BNP Paribas Bank Polska S.A. is the GO beyond Strategy for 2022, adopted by the Management Board and the Supervisory Board in March 2022. GO beyond Strategy for 2022-25. The main objective of this strategy is to continue the dynamic development of the Bank, which will be an institution that operates efficiently, with committed employees and satisfied Customers, while being a leader in activities that support sustainable development. It is a strategy fully integrated with ESG issues.

3. A presentation of the Bank's GO beyond Strategy 2022-25 is available on the Bank's website <https://www.bnpparibas.pl/relacje-inwestorskie/o-banku/strategia-banku>. It takes into account the financial and non-financial targets planned to be achieved over the strategy horizon. Strategy progress is published: quarterly in terms of business achievements by strategic pillar and annually in terms of key strategic objectives (KPIs).

4. A description of the implementation of the strategy is part of the annual reports, investor presentations and materials published on the Bank's website.

5. Oversight of environmental, social and governance - ESG (E - environmental, S - social, G - governance) issues, including the implementation of strategic CSR and sustainability objectives, is exercised by the Management Board headed by the CEO. The Management Board approves the direction and scope of activities, and also gives its opinion and supervises the integration of sustainability activities. Since January 2022, sustainability tasks previously divided between the various units of our Bank have been carried out by the Sustainability Area, which acts as the coordinator of ESG activities in the organisation. The Executive Director of the Area, reports directly to the CEO. In addition, he also heads the informal structure of the Sustainability Community, acting as Chief Sustainability Officer.

6. With regard to climate change risk, as part of the review of the risk identification process, ESG risk was assessed as material to the Bank and was introduced into the Risk Management Strategy.

7. Implementing market best practice in 2020. BNP Paribas Bank Polska S.A. measured the pay gap for the first time. After analysing the results, systemic and dedicated actions and recommendations were taken to reduce the level of the pay gap, including as part of the annual remuneration review process. The pay equity indicator is measured according to the Bank's internal methodology taking into account total remuneration based on homogeneous groups of employees (created by area of employment and grade level). The indicator is published in the annual Management Report and on the Bank's annual report website. In the GO beyond Strategy 2022-2025, the Bank adopted a further reduction of the GPG ratio to below 4% to be realised. At the end of 2024, the wage gap, as expressed in the Gender Pay Gap indicator, was 3.8%. This means that men's salaries were 3.8% higher than those of women in comparable positions. The indicator is a weighted average of the size of the different employee groups. Compared to 2023, the indicator has decreased by 2.4 p.p.

2. THE MANAGEMENT BOARD AND THE SUPERVISORY BOARD

1. The Bank has a diversity policy, which formally forms part of the policy for assessing the suitability of the members of the Supervisory Board of BNP Paribas Bank Polska S.A. and, in the case of the members of the Management Board, forms part of the policy for assessing the suitability of the members of the Management Board and Persons performing key functions at BNP Paribas Bank Polska S.A., which was adopted by the Supervisory Board on 8 December 2022.



2. The application of criteria to ensure diversity in the Bank's bodies is a legally binding requirement under specific regulations as well as the EBA [European Banking Authority] Guidelines applicable to banks. The Bank realistically implements the diversity policy, including with regard to ensuring an adequate representation of women in the Bank's bodies. The Bank has taken a strategic decision reflected in the Diversity Policy that by 2025 it will ensure the participation of 30% women in the Management Board and Supervisory Board separately. As a result of the changes made to the composition of the Bank's bodies, at the end of 2024, the proportion of women on the Management Board is 37.5% and the proportion of women on the Supervisory Board is 45%. Compliance with the principle of diversity is monitored not only at the level of the Bank's Bodies, but also at the level of managerial positions. At the end of 2024, in the highest managerial positions other than the Management Board (SMP - Senior Managerial Positions: managing director, executive director, tribe leader), the share of women was 39%.

3. Detailed information on the members of the Management Board and the Supervisory Board is presented later in this report under "Statutory Bodies of the Bank".

3. INTERNAL SYSTEMS AND FUNCTIONS

1. The Bank has implemented an internal control system adapted to the organisational structure. The Bank has an internal control system with individual internal control elements of a permanent and periodic nature. As part of the internal control system, the Bank identifies the risks associated with each operation, transaction, product and service. The internal control system serves to manage the risks in the Bank's processes. Responsibility for risk management by the Bank's individual units/organizational units is defined within three mutually independent lines of responsibility, known as "lines of defence", taking into account the sales and operations units, the control units and the examination of the Bank's compliance with laws and internal regulations, and internal audit.

4. GENERAL MEETING AND RELATIONS WITH SHAREHOLDERS

1. The Bank, shall enable shareholders to participate and vote in the General Meeting by means of electronic communication (e-General Meeting). The Bank conducts real-time transmission of the General Meeting via the Internet and at the same time allows direct participation of media representatives. Recordings of the proceedings are posted on the Bank's website - Investor Relations/General Meetings page.

2. The Bank shall respond to inquiries from shareholders within deadlines that comply with the applicable legal standards.

3. On 16 April 2024, the Annual General Meeting of the Bank adopted a resolution on the payment of dividends from the net profit made in 2023. Based on this resolution, the Bank paid a dividend of PLN 503,997,556.70, i.e. PLN 3.41 per share. The dividend covered all shares issued by the Bank, i.e. 147,799,870 shares. The dividend date was set for 23 April 2024 and the dividend payment date for 10 May 2024.

5. CONFLICTS OF INTEREST AND RELATED PARTY TRANSACTIONS

1. Members of the Management Board and Supervisory Board shall avoid any activity that could lead to a conflict of interest. In the event of a potential conflict of interest, e.g. during voting on a resolution of the Bank's Management Board or the Supervisory Board, a member of the body shall not take part in the voting (this is recorded in the minutes each time).

6. REMUNERATION

1. The remuneration paid to persons with a significant impact on the Bank's risk profile is adequate, i.e. it reflects their contribution to the achievement of the Bank's objectives, their workload and the best market practice of rewarding persons in similar positions, as adopted on the Polish market, and takes into account the appropriate ratio of fixed remuneration to variable remuneration.

2. The remuneration of the members of the Supervisory Board shall be determined in accordance with their functions, as well as in accordance with the scale of operations, the complexity of the organisational structure and the degree of complexity of the Bank's activities.

3. In order for the Bank to be able to attract, retain and motivate highly qualified individuals serving as members of the Management Board, the Remuneration Policy also takes into account market practices. This means that it may be changed in a situation where a market practice differs from the principles adopted by BNP Paribas Bank Polska S.A.

4. The Bank does not operate a management option programme understood as an optional (subject to the decision of the eligible person) right to acquire shares at a predetermined price, the expiry of a certain period of time and the fulfilment of certain conditions. The Bank currently operates an incentive programme implemented in accordance with Article 9ca(1) of the Banking Law and the Decree of the Minister of Finance, Funds and Regional Policy of 8 June 2021 on

the risk management system and internal control system and remuneration policy in banks, under which part of the variable remuneration is paid in the form of warrants convertible into Bank shares. This is an incentive scheme in which the Bank pays variable remuneration (annual bonus) to executives by determining the number of shares using their market value, and shares are taken up at their nominal value.

The Bank's Management Board declares that the Bank and its bodies have complied in 2024 with the corporate governance principles set out in the "Corporate Governance Principles for Supervised Institutions" and the standards set out in the "Best Practices for Companies Listed on the Warsaw Stock Exchange". During the period covered by this report, no breaches of the Corporate Governance Principles reported by the Bank were identified.



Shares and shareholders

Shareholding structure

The table below shows the Bank's shareholding structure as at 31 December 2024, distinguishing shareholders who held at least 5% of the total number of votes at the General Meeting.

Table 163.. Shareholding structure as at 31.12.2024.

shareholder	number of shares	% share in the capital stock	number of votes at the General Meeting	% share in the total number of votes at the General Meeting
BNP Paribas, total:	120 124 392	81,28%	120 124 392	81,28%
<i>BNP Paribas directly</i>	<i>84 634 166</i>	<i>57,26%</i>	<i>84 634 166</i>	<i>57,26%</i>
<i>BNP Paribas Fortis SA/NV directly</i>	<i>35 490 226</i>	<i>24,01%</i>	<i>35 490 226</i>	<i>24,01%</i>
Others	27 675 478	18,72%	27 675 478	18,72%
Total	147 799 870	100,00%	147 799 870	100,00%

As of 5 April 2024, the Bank's share capital amounts to PLN 147,799,870. The capital consists of PLN 147,799,870 shares with a nominal value of PLN 1 each, including:

- A series - 15,088,100 shares,
- B series - 7,807,300 shares,
- C series - 247,329 shares,
- D series - 3,220,932 shares,
- E series - 10,640,643 shares,
- F series - 6,132,460 shares,
- G series - 8,000,000 shares,
- H series - 5,002,000 shares,

- Series I - 28,099,554 shares,
- J series - 2,500,000 shares,
- K series - 10,800,000 shares,
- L series - 49,880,600 shares,
- M series - 302,636 shares,
- N series - 78,316 shares.

The four series B shares are preference shares. This privilege includes the right to receive payment of the full nominal amount per share in the event of the liquidation of the Bank after satisfaction of creditors, in priority to payments attributable to ordinary shares, which payments, in view of the exercise of the privilege, may not cover the nominal amount of these shares.

The total number of votes attached to all the Bank's shares is 147,799,870. The number of votes resulting from the allocated Series M Shares is 44,608 votes and from the Series N Shares is 78,316 votes.

The amount of the conditional share capital increase following the issue of Series M and N Shares totals PLN 1,395,048.

Changes in shareholder structure in 2024.

Table 164. Shareholding structure as at 1.01.2024

shareholder	number of shares	% share in the capital stock	number of votes at the General Meeting	% share in the total number of votes at the General Meeting
BNP Paribas, total:	128 989 183	87,35%	128 989 183	87,35%
<i>BNP Paribas directly</i>	<i>93 498 957</i>	<i>63,31%</i>	<i>93 498 957</i>	<i>63,31%</i>
<i>BNP Paribas Fortis SA/NV directly</i>	<i>35 490 226</i>	<i>24,03%</i>	<i>35 490 226</i>	<i>24,03%</i>
Others	18 687 763	12,65%	18 687 763	12,65%
Total	147 676 946	100,00%	147 676 946	100,00%

On 14 March 2024, block trades were concluded in connection with the completion of the accelerated book building (ABB) process for the sale of 8,860,616 shares in the Bank by BNP Paribas SA, the Bank's main shareholder.

Following the settlement of the aforementioned transactions and other transactions made on the regulated market concerning 6,545 shares in the Bank, BNP Paribas SA's share in the total number of votes at the Bank's General Meeting decreased by approximately 6%.

On 5 April 2024, the Bank's share capital was increased from PLN 147,676,946 to PLN 147,799,870 as a result of the subscription of 44,608 series M shares and 78,316 series N shares (a total of 122,924 Bank shares with a total nominal value of PLN 122,924) in exercise of rights from previously subscribed registered subscription warrants of series A4 and B1 respectively.

Details of the subscription for M and N shares are presented in the Chapter: About Us, in the section: Key events.

BNP Paribas SA directly holds 84,634,166 shares in the Bank representing (as at 31 December 2024) approximately 57.26% of the total number of shares and votes in the Bank, and together with other entities of the BNP Paribas SA Group controls a total of 120,124,392 shares in the Bank representing (as at 31 December 2024) approximately 81.28% of the total number of shares and votes in the Bank.

BNP Paribas' intention regarding the liquidity of the Bank's shares

According to information received from BNP Paribas SA, the Bank's main shareholder, BNP Paribas SA declares its intention to increase the number of the Bank's free float shares to at least 25% over time.

Ownership of Bank shares by members of the Management Board and members of the Supervisory Board

A summary of the Bank's shareholdings and share entitlements of the members of the Bank's Management Board and Supervisory Board as at the date of the report for 2024 (13 March 2025) and the Financial Statements for the third quarter of 2024 (8 November 2024) is presented below.

**Table 165. Number of shares and subscription warrants held by members of the Bank's Management Board and Supervisory Board.**

Member of the Bank's Management Board	shares 8.11.2024	Subscription warrants ¹ 8.11.2024	Sale of shares	shares 13.03.2025	Subscription warrants ¹ 13.03.2025
Przemysław Gdański	39 366	8 280	-	39 366	8 280
André Boulanger	-	5 953	-	-	5 953
Małgorzata Dąbrowska	-	-	-	-	-
Wojciech Kembłowski	-	3 671	-	-	3 671
Piotr Konieczny	-	455	-	-	455
Magdalena Nowicka	-	2 392	-	-	2 392
Volodymyr Radin	-	1 364	-	-	1 364
Agnieszka Wolska	4 095	2 443	-	4 095	2 443

Member of the Bank's Management Board	shares 8.11.2024	Subscription warrants ¹ 8.11.2024	Sale of shares	shares 13.03.2025	Subscription warrants ¹ 13.03.2025
Jean-Charles Aranda	-	1 828	-	-	1 828

1) Subscription warrants taken up on 21.03.2024: A5 series - one A5 series warrant entitles to take up one M series ordinary bearer share of BNP Paribas Bank Polska S.A., at the issue price of PLN 1.00 per share and B2 series - one B2 series warrant entitles to take up one N series ordinary bearer share of BNP Paribas Bank Polska S.A., at the issue price of PLN 1.00 per share..

The other members of the Supervisory Board did not declare their shareholding/entitlements in the Bank as at 13 March 2025, which has not changed since the submission of the Q3 2024 Financial Report (8 November 2024).

Statutory bodies of the Bank

General Meeting

Manner of operation and fundamental powers of the General Meeting

The manner of operation of the General Meeting and its basic powers are set out in the generally applicable provisions of the Code of Commercial Companies and Partnerships and the Banking Law, as well as the Bank's internal documents - the Bank's Statute and the Regulations of the General Meeting of BNP Paribas Bank Polska S.A., taking into account the provisions of the "Code of Best Practice for WSE Listed Companies" and the "Corporate Governance Principles for Supervised Institutions". The above corporate documents are available on the Bank's website <https://www.bnpparibas.pl/relacje-inwestorskie/lad-korporacyjny/dokumenty-banku>

General Meetings are held as ordinary and extraordinary General Meetings. Ordinary General Meetings shall be held once a year, no later than within 6 months after the end of each financial year. Extraordinary General Meetings are convened as necessary by the Bank's Management Board on its own initiative or at the request of the Supervisory Board, or at the request of a shareholder or shareholders representing a total of at least 5% of the share capital.

The General Meeting decides on matters which, in accordance with the law and the Bank's internal regulations, are reserved to the competence of the General Meeting. In particular, the subject matter of the General Meeting shall be:

- considering and approving the report of the Management Board on the Bank's activities and the financial statements for the previous financial year,
- examining and approving the report of the Management Board on the activities of the Banking Group and the consolidated financial statements of the Banking Group for the past financial year,
- adopting a resolution on the distribution of profit or coverage of loss,
- granting discharge to the members of the Bank's bodies for the performance of their duties,
- amending the Bank's Statutes,

- appointment and dismissal of members of the Supervisory Board - one of the criteria of the suitability assessment is the verification of possible conflicts of interest. The General Meeting of Shareholders receives a report with a summary of the assessment, which includes the necessary information on the results of the suitability assessment, including information on conflicts of interest. The document is available to the public,
- setting the principles for remuneration and remuneration of the members of the Supervisory Board,
- increase or reduction of the Bank's share capital,
- issuing convertible bonds and bonds with pre-emptive rights to acquire the Bank's shares, as well as subscription warrants,
- redemption of shares and specification of detailed conditions for such redemption,
- merger or liquidation of the Bank, the appointment of liquidators and the manner in which liquidation is to be carried out.
- The Company shall convene the General Meeting by means of an announcement published on the Bank's website <https://www.bnpparibas.pl/relacje-inwestorskie/walne-zgromadzenie> - at least 26 days before the date of the General Meeting. Together with the Notice convening the General Meeting, draft resolutions (with the Supervisory Board's opinion), justifications to resolutions and other materials submitted to the General Meeting are made available on the Bank's website. The dates on which the above materials are made available to the public enable the participants of the General Meeting to familiarise themselves with them in detail.
- Shareholders may attend the General Meeting and exercise their voting rights in person or by proxy. The Bank also enables shareholders to participate in the General Meeting by means of electronic communication, ensuring two-way communication in real time and to exercise their voting rights during the meeting in person or by proxy.
- Voting takes place by means of an electronic voting and counting system that ensures that votes are cast in the number of shares held. Each share confers the right to one vote. In the event of a secret ballot, the system ensures confidentiality. Voting rights are exercised by shareholders in person or by proxy.
- The Bank also allows media representatives to attend the General Meeting.



- The General Meeting is broadcast in real time over the Internet and the recording of the broadcast is posted on the Bank's website under the tab dedicated to the relevant General Meeting. Information on the planned transmission of the General Meeting shall be announced at the time of publication of the Notice convening the General Meeting.

General Meetings in 2024.

The Annual General Meeting of the Bank was held on 16 April 2024, which, in addition to resolutions of a procedural nature:

- approved the annual reports and statements submitted by the Management Board and the Supervisory Board, as required by law, including the Financial Statements, the Management Report on the Bank's activities and the Report presenting non-financial information for 2023,
- adopted a resolution on the distribution of profit for 2023 (decided to pay a dividend of PLN 503,997,556.70. and to transfer the remaining part of the Bank's net profit of PLN 503,829,981.45 to reserve capital),
- discharged the members of the Management Board and Supervisory Board for the performance of their duties in 2023,
- adopted a periodic assessment of the individual and collective adequacy of the members of the Supervisory Board and an assessment of the adequacy of the Bank's internal regulations concerning the functioning of the Supervisory Board and the effectiveness of its operations,
- adopted the report submitted by the Supervisory Board on the independent evaluation of the functioning of the remuneration policy at BNP Paribas Bank Polska S.A. in 2023 and the report on the remuneration of the members of the Management Board and the Supervisory Board of BNP Paribas Bank Polska S.A. in 2023,
- adopted a resolution on the approval of the Policy for the Assessment of the Suitability of the Members of the Supervisory Board of BNP Paribas Bank Polska S.A.,
- adopted a resolution amending the resolution on the Remuneration Policy for the members of the Supervisory Board of BNP Paribas Bank Polska S.A. and the Remuneration Policy for the persons with significant influence on the risk profile of BNP Paribas Bank Polska S.A. and the resolution on determination of remuneration of the Supervisory Board members,

- adopted resolutions on amendments to the Bank's Statutes and the unified text of the Bank's Statutes; the amendments relate to the adjustment of the Bank's business objects to the Banking Law as amended by the Act - Act amending certain acts in connection with ensuring the development of the financial market and the protection of investors in this market of 16 August 2023 (Journal of Laws of 2023, item 1723) and adjustment of the procedure for issuing internal regulations and other editorial simplifications.

An Extraordinary General Meeting of the Bank was held on 2 July 2024, which, in addition to resolutions of a procedural nature:

- adopted an assessment of the individual suitability of the candidate for the Supervisory Board and appointed a new member, Mrs Monika Kaczorek, to the Supervisory Board of BNP Paribas Bank Polska S.A., effective 3 July 2024,
- adopted the assessment of the collective adequacy of the Supervisory Board of BNP Paribas Bank Polska S.A. following the change in the composition of the Supervisory Board,
- adopted a resolution regarding amendments to Resolution No. 8 of the Extraordinary General Meeting of BNP Paribas Bank Polska S.A. dated 17 June 2021 regarding the determination of the remuneration of the members of the Supervisory Board of BNP Paribas Bank Polska S.A. ('Resolution No. 8'), Resolution No. 37 of the Annual General Meeting of 27 June 2022 on amending Resolution No. 8 and Resolution of the Annual General Meeting of BNP Paribas Bank Polska S.A. of 30 June 2023 on amending Resolution No. 8,
- adopted resolutions on amendments to the Statutes of the Bank and the unified text of the Statutes; the amendments resulted from the necessity to adjust the Bank's object of activity to the Banking Law amended by the Act - Act amending certain acts in connection with ensuring the development of the financial market and the protection of investors in this market of 16 August 2023 (Journal of Laws of 2023, item 1723) with regard to brokerage activity.

The text of the resolutions adopted by the General Meeting is available on the BNP Paribas Bank Polska S.A. website at: <https://www.bnpparibas.pl/relacje-inwestorskie/walne-zgromadzenie> and <https://www.bnpparibas.pl/relacje-inwestorskie/walne-zgromadzenie/archiwum-walnych-zgromadzen-banku-bnp-paribas>

Essential rights of shareholders and how to exercise them

The rights of shareholders are set out in the Bank's General Meeting Regulations and derive from the provisions of the Commercial Companies Code. The following are the most important shareholder rights:

- the shareholder is entitled to a share of the profit shown in the audited financial statements and allocated by the General Meeting for distribution to the shareholders,
- the shareholder has the right to participate in the General Meeting and exercise his/her voting rights in person or by proxy,
- the shareholder may participate in the General Meeting using electronic means of communication (he/she may speak at the General Meeting and exercise his/her voting rights during the General Meeting either in person or through an attorney). Detailed rules of participation in the Bank's General Meeting using electronic means of communication are set out in the "Rules of Participation in the General Meeting of BNP Paribas Bank Polska S.A. using electronic means of communication",
- the shareholder or shareholders representing jointly at least 5% of the Bank's share capital may demand that an Extraordinary General Meeting be convened, as well as that certain items be put on the agenda of the General Meeting,
- the shareholders representing at least half of the Bank's share capital or at least half of the total voting rights in the Bank may convene an Extraordinary General Meeting. The shareholders shall appoint the Chairperson of this meeting,
- the shareholder has access to the list of shareholders. He may inspect the list of shareholders at the Bank's registered office, request a copy of the list or request that the list of shareholders be sent to him by e-mail,
- the shareholder has the right to receive copies of motions relating to items on the agenda of the General Meeting within one week before the date of the General Meeting and to request information from the Bank's Management Board relating to items on the agenda of the General Meeting, subject to the exceptions set out in the Commercial Companies Code Act,
- the shareholder has the right to inspect the book of minutes of the General Meeting and to request copies of the resolutions certified by the Bank's Management Board,



- the shareholder has the right to demand a secret ballot,
- the shareholder has the right to object to a resolution being adopted and to challenge resolutions of the General Meeting in the cases and subject to the exceptions set out in the Commercial Companies Code Act (action to repeal a resolution or action to declare a resolution invalid),
- the shareholder has the right to ask questions and request information from the Management Board regarding matters on the agenda of the General Meeting in the cases and subject to the exceptions set out in the Commercial Companies Code Act.

Procedure for amending the Bank's Statutes

Any amendment to the Bank's Statutes requires a resolution of the General Meeting and an entry in the Register of Entrepreneurs of the National Court Register. An amendment to the Bank's Statutes also requires a permit from the Financial Supervision Authority, as provided for in Article 34(2) of the Act of 29 August 1997 - Banking Law (consolidated text Dz.U. of 2016, item 1988, as amended). Motions of the Bank's Management Board regarding amendments to the Bank's Statutes, as well as other matters submitted by the Bank's Management Board for consideration by the General Meeting, should be subject to prior opinion of the Bank's Supervisory Board.

In matters concerning amendments to the Bank's Statutes, including in particular changes to the Bank's business name, its registered office, its business profile (as referred to in § 5(2) of the Bank's Statutes), the increase or decrease of the Bank's share capital, the issue of convertible bonds and bonds with the pre-emptive right to acquire the Bank's shares, as well as subscription warrants, and also the liquidation or dissolution of the Bank, the sale of the whole or part of the Banking enterprise - the resolutions of the General Meeting are adopted by a majority of three-fourths of the votes cast. A resolution on the merger of the Bank with another Bank or credit institution requires a resolution of the General Meeting adopted by a majority of 2/3 of votes (§ 13 section 2 of the Bank's Statutes).

Pursuant to the provisions of § 20 (1) (1) (m) of the Bank's Statutes, immediately after the General Meeting adopts resolutions introducing amendments to the Bank's Statutes, the Supervisory Board determines the consolidated text of the Bank's Statutes and is responsible for introducing other amendments of editorial nature, as specified in the resolutions of the General Meeting

Amendments made to the Bank's Statutes in 2024.

1. Pursuant to **Resolution 38 of the AGM of 16 April 2024**, the Bank's Statutes were amended as follows:

- in § 5(2)(9) the following was deleted: "forward financial operations";
- in § 5(2)(11), the following was deleted: "safekeeping of objects and securities and provision of safe-deposit boxes";
- in § 5(3)(1), the following was deleted: "taking up and acquiring shares and rights over shares, shares of another legal person or investment fund units";
- in § 5(3)(2), the following was deleted: "incurring liabilities in connection with the issue of securities";
- in § 5(3)(8)(a), the following was deleted: "accepting and forwarding orders to purchase or sell financial instruments not admitted to organised trading and securities issued by the State Treasury or the National Bank of Poland,".
- § 5(3)(8)(c) is replaced by the following:
 - the acquisition or disposal of financial instruments for their own account.
- § 5(3)(8)(d) is replaced by the following:
 - advising companies on capital structure, corporate strategy or other issues related to such structure or strategy.
- § 5(3)(8)(e) is replaced by the following:
 - advisory and other services in the field of mergers, demergers and acquisitions.
- § 5(3)(8) after point (e) the sentence reads:
 - with the proviso that the subject of the activities specified in point (b) may also be bonds issued by Bank Gospodarstwa Krajowego for the benefit of funds created, entrusted or transferred to that bank under separate acts, guaranteed by the State Treasury, as well as bonds issued by the Bank Guarantee Fund or the asset management entity referred to in Art. 224(1) of the Act of 10 June 2016 on the Bank Guarantee Fund, Deposit Guarantee Scheme and Forced Restructuring, and with the proviso that the activities specified in point (c) are not performed in the course of performing the function of a market maker on shares or derivatives whose underlying instrument is shares.
- § 20(5) was replaced with the following:

- The Supervisory Board establishes internal committees consisting of members of the Supervisory Board, in particular the Audit Committee, the Remuneration Committee, the Nominations Committee and the Risk Committee. The organisation, competences and responsibilities of the internal committees are defined in the Rules of Procedure of the Supervisory Board.

- § 33(2)(5) is replaced by the following:

- to executive directors - with regard to the managed management area, to managing directors and other persons holding positions equivalent to the managing directors of the Bank and to the director of the Brokerage Office - with regard to the subordinate units, organisational units or other organisational forms, including the issuance of model contracts, general terms and conditions of contracts, by-laws, regulations of promotions and competitions, model forms and forms and official instructions, as well as the issuance of internal regulations describing the course of processes in the Bank, within the scope specified in the resolution referred to in paragraph 3.

- § 33(2)(8) is replaced by the following:

- to the director of the basic organisational unit of the Bank's Head Office - within the material competence of this unit, including to issue specimens of forms and forms and business instructions, as well as to issue internal regulations describing the course of processes in the Bank, within the scope specified in the resolution referred to in paragraph 3.

2. Pursuant to **Resolution 6 of the EGM of 2 July 2024**, Bank's Statutes were amended as follows:

- § 5(3)(3) the following was deleted: "trading in securities".

- § 5(3)(7) is replaced by the following:

(7) the conduct of a brokerage business (brokerage company) by carrying out the following activities:

- (a) receiving and transmitting orders to buy or sell financial instruments,*
- (b) to execute the orders referred to in point (a) for the account of the principal,*
- (c) management of portfolios that include one or more financial instruments,*
- (d) investment advice,*
- (e) the offering of financial instruments,*



(f) safekeeping or recording of financial instruments, including the maintenance of securities accounts and the maintenance of cash accounts,

(g) the preparation of investment analyses, financial analyses and other recommendations of a general nature concerning transactions in financial instruments,

(h) the acquisition or disposal for own account of financial instruments.

Supervisory Board

Principles of operation of the Supervisory Board

The Supervisory Board of BNP Paribas Bank Polska S.A. operates under the provisions of the Banking Law, the Code of Commercial Companies and Partnerships as well as the Bank's Statute and the Regulations of the Supervisory Board. The Statute and Regulations are available on the Bank's website: <https://www.bnpparibas.pl/relacje-inwestorskie/lad-korporacyjny/dokumenty-banku>.

The Supervisory Board is appointed by the General Meeting for a joint term of five years. As of 31 December 2024 the Supervisory Board consists of 11 members. At least half of the members of the Supervisory Board have good knowledge of the Banking market in Poland, i.e. speak Polish and have relevant experience on the Polish market. The mandates of Supervisory Board members expire at the end of their term of office on the date of the General Meeting which approves the financial statements for the last full year in which they held office. The mandate of a member of the Supervisory Board appointed before the expiry of a given term of office of the Supervisory Board shall expire at the same time as the mandates of the other members of the Supervisory Board. The expiry of the mandate of a member of the Supervisory Board shall also occur as a result of resignation, dismissal and death of.

The Supervisory Board exercises constant supervision over the Bank's activities in all aspects of its operation. In particular, it evaluates the Management Reports on the activities of the Bank and the Bank Group and the Financial Statements of the Bank and the Bank Group for the previous financial year. It verifies that they are consistent with the books, documents and facts. Assesses the Management Board's proposals for the distribution of profit or coverage of loss. At the same time, it supervises the implementation of the internal control system and assesses its adequacy and effectiveness.

The Supervisory Board prepares and presents to the Annual General Meeting an annual report on its activities, including a summary of the activities of the Supervisory Board Committees. In addition, the Supervisory Board presents the Annual General Meeting with a report on the results of the evaluation of the audit of the financial statements (separate and consolidated, including the Management Board's proposal for profit distribution), the Management Board's report on the Group's activities and the evaluation of the report on non-financial information. In addition to evaluating the adequacy and effectiveness of the internal control system, the Supervisory Board simultaneously assesses the risk management system, compliance assurance and the internal audit function. It also assesses the application of the principles of corporate governance, the functioning of the remuneration policy and the suitability policy on the election of members of the Management Board or the Supervisory Board, and the reasonableness of the sponsorship and charitable policy.

Resolutions of the Supervisory Board are effectively adopted if all members of the Board have been notified of the meeting and at least half of the members of the Supervisory Board are present at the meeting, including its Chairperson or Vice-Chairperson. Resolutions of the Supervisory Board are adopted by a simple majority of votes in an open vote. At the request of a member of the Supervisory Board, the Chairperson of the Supervisory Board shall order a secret ballot. The Supervisory Board may also adopt resolutions in writing, without convening a

meeting or by means of direct communication at a distance, in particular by means of telephone, audiovisual and electronic communication.

The Bank's Statutes (§ 16(4)) stipulate that at least two members of the Supervisory Board should meet the independence criteria Independent members of the Supervisory Board should not be related to the Bank, the Bank's shareholders or employees in a way that could materially influence or give rise to a reasonable presumption of materially influencing the independent member's ability to make impartial decisions.

As of 1 January 2024, six members of the Supervisory Board met these criteria: Lucyna Stańczak-Wuczyńska, Jarosław Bauc, Małgorzata Chruściak, Magdalena Dzięwguć, Jacques Rinino and Mariusz Warych.

As of 31 December 2024, following the changes made to the composition of the Supervisory Board in 2024, five members of the Board met the aforementioned criteria: Lucyna Stańczak-Wuczyńska, Monika Kaczorek, Małgorzata Chruściak, Jacques Rinino and Mariusz Warych.

The composition of the Bank's Supervisory Board and its committees is adequate in terms of numbers and in line with diversity and suitability criteria, both individually and as a whole body, which contributes to the effective exercise of ongoing supervision by the Supervisory Board. Conducting periodic individual and collective assessments of the suitability of the members of the Supervisory Board ensures that the composition of the Board is maintained in such a way as to guarantee an optimum level of qualifications, knowledge and professional experience, thereby ensuring an appropriate level of collegial supervision of the Bank..

**Table 166. Composition of the Bank's Supervisory Board and Supervisory Board Committees as of 1.01.2024, including information on the independence of the members**

Lp.	Name	Function on the Supervisory Board	Committees of the Supervisory Board			
			Audit Committee	Risk Committee	Remuneration Committee	Nominations Committee
1.	Lucyna Stańczak-Wuczyńska	Chairperson <i>Independent Member</i>	Member	Member	Chairperson	Chairperson
2.	Francois Benaroya	Vice-Chairperson	Member	Member	Member	Member
3.	Jean Charles Aranda	Member	Member			
4.	Jarostaw Bauc*	Independent Member	Member			
5.	Małgorzata Chruściak	Independent Member		Member		
6.	Magdalena Dziewguć**	Independent Member			Member	Member
7.	Sophie Heller	Member				
8.	Vincent Metz	Member				
9.	Piotr Mietkowski	Member				
10.	Khatleen Pauwels	Member				
11.	Jacques Rinino	Independent Member		Chairperson		
12.	Mariusz Warych	Independent Member	Chairperson	Member		

* Mr Jarostaw Bauc served as a member of the Supervisory Board until 2 July 2024.

** Ms Magdalena Dziewguć served as a member of the Supervisory Board until 21 November 2024.

Table 167. Composition of the Bank's Supervisory Board and Supervisory Board Committees as at 31.12.2024, including information on the independence of the members

Lp.	Name	Function on the Supervisory Board	Committees of the Supervisory Board			
			Audit Committee	Risk Committee	Remuneration Committee	Nominations Committee
1.	Lucyna Stańczak-Wuczyńska	Chairperson <i>Independent Member</i>	Member	Member	Chairperson	Chairperson
2.	Francois Benaroya	Vice-Chairperson	Member	Member	Member	Member
3.	Jean-Charles Aranda	Member	Member			
4.	Małgorzata Chruściak	Independent Member		Member	Member	Member
5.	Sophie Heller	Member				
6.	Monika Kaczorek*	Independent Member	Member			
7.	Vincent Metz	Member				
8.	Piotr Mietkowski	Member				
9.	Khatleen Pauwels	Member				
10.	Jacques Rinino	Independent Member		Chairperson		
11.	Mariusz Warych	Independent Member	Chairperson	Member		

* On 2 July 2024, the Extraordinary General Meeting of the Bank appointed Ms Monika Kaczorek as an Independent member of the Bank's Supervisory Board, effective 3 July 2024.



Changes in the composition of the Bank's Supervisory Board in the period 1 January-31 December 2024:

- On 25 June 2024, Mr Jarosław Bauc resigned as a member of the Bank's Supervisory Board with effect from 2 July 2024, in view of the permitted 12 years of independent membership of the Bank's Audit Committee, following Article 129(3)(8) of the Act on Statutory Auditors, Audit Forms and Public Supervision of 11 May 2017;
- On 2 July 2024, the Extraordinary General Meeting of the Bank appointed Mrs Monika Kaczorek as an independent member of the Supervisory Board with effect from 3 July 2024 until the end of the current five-year joint term of office of the members of the Supervisory Board;
- On 22 November 2024, Mrs Magdalena Dziewguć handed in her resignation from the Bank's Supervisory Board with effect from 21 November 2024. The reason for Mrs Magdalena Dziewguć's resignation was a planned change in professional activity.

In 2024, the members of the Bank's Supervisory Board devoted an appropriate amount of time to the performance of their duties. The Bank's Supervisory Board held in 2024 20 meetings, of which 15 were in writing. It adopted 86 resolutions. The attendance rate of the Board members at meetings was 92.6%.

In 2024, the Supervisory Board fulfilled its duties, which derive from the law and the Bank's Statutes. These duties are set out in the "Framework Work Plan of the Supervisory Board and the Committees operating at the Supervisory Board for 2024". In addition, the Supervisory Board received current information on the most important developments and decisions of the Management Board, so that it had adequate knowledge of the Bank's position, the macroeconomic situation and the market environment. In this way, it was able to assess how these factors affected the Bank's performance and development plans.

In 2024, on the recommendation of the Risk Committee, the Supervisory Board adopted a resolution to issue AT1 equity instruments.

Table 168. Individual activity of Supervisory Board members in 2024*

Lucyna Stańczak- Wuczyńska	Francois Benaroya	Khatleen Pauwels	Jarosław Bauc	Małgorzata Chruściak	Magdalena Dziewguć	
20/20	20/20	19/20	8/9	17/20	13/17	
Vincent Metz	Piotr Mietkowski	Mariusz Warych	Monika Kaczorek	Jean- Charles Aranda	Sophie Heller	Jacques Rinino
19/20	20/20	20/20	11/11	19/20	15/20	20/20

* attendance at meetings/number of meetings

Members of the Supervisory Board

Pursuant to the Policy for the assessment of the suitability of the members of the Supervisory Board of BNP Paribas Bank Polska S.A. in force at the Bank, developed on the basis of the guidelines of the European Banking Authority of 21 March 2018 on the assessment of the suitability of the members of the management body and of the persons performing the most important functions (EBA/GL/2021/06) and the Methodology of the Polish Financial Supervision Authority for the assessment of the suitability of the members of the bodies of supervised entities (published on 27 January 2020), as well as the Banking Law and other legal acts regulating the aforementioned issues, the members of the Supervisory Board are subject to individual suitability assessment (initial and periodic) and collective suitability assessment - the Supervisory Board as a whole.

Individual and collective suitability assessments are carried out at least once a year and in situations indicated in the Bank's Policy, such as when candidates for the Supervisory Board members are put forward (prior to the appointment of the person concerned), when the composition of the Supervisory Board changes or when there is a significant change in the Bank's business model. The Nominations Committee carries out an assessment of the individual and collective suitability of the Supervisory Board and the results of the suitability assessment are presented by the Supervisory Board to the General Meeting.

The members of the Supervisory Board have diverse expertise, a high level of qualifications, competence and professional experience. They ensure an

appropriate level of collegial supervision of all areas of the Bank's activities and guarantee a broad and comprehensive representation of views in assessing the work of the Bank's Management Board and the functioning of the Bank. The Chairperson of the supervisory body is not a member of the management team.

1. Lucyna Stańczak-Wuczyńska - Chairperson of the Supervisory Board (independent member)

She is a graduate of economics at the Warsaw School of Economics and of postgraduate Advanced European Studies at the College of Europe in Bruges. Since the beginning of her nearly 30-year professional career, Lucyna Stańczak-Wuczyńska has been involved in banking. Between 1992 and 1995, she worked at IBP Bank S.A. in the area of corporate banking. Then, between 1995 and 1997, she worked at Credit Lyonnais Bank Polska, in the area of corporate finance. In 1997, she took the position of Vice President at ABN Amro Bank Polska in the Structured Finance Department. From 2000 to 2020, she was associated with the European Bank for Reconstruction and Development (EBRD). Initially as Senior Banker, she was responsible for investments in the energy and infrastructure sectors. Since 2008 as Country Director of the EBRD in Poland. Since 2014, she was Regional Director of EU-Banks, Financial Institution, Central and Southern Europe region with a portfolio of equity and debt investments in banks and financial institutions exceeding EUR 4 billion. In her professional career, Lucyna Stańczak-Wuczyńska has held a number of corporate governance positions, was a member and observer of Supervisory Boards and a member of audit and risk committees at, among others, Polkomtel Sp. z o.o., Alior Bank S.A., Polskie Inwestycje Rozwojowe, Erste Bank in Hungary, and was a member of the Advisory Board in Private Equity funds. Since December 2020, she has been a member of the Bank's Supervisory Board, then Vice-Chairperson and now Chairperson of the Supervisory Board. In 2022, she was appointed to the Supervisory Board of Banca Transilvania, the largest bank in Romania in terms of assets. Sustainability and Green Economy Transition topics have always been an important area of interest in her professional work. She has been involved in project financing related to renewable energy, energy efficiency, low carbon, sustainable finance, green bond investing, SLB and ESG topics in the area of corporate governance and reporting.



Lucyna Stańczak-Wuczyńska is also Chair of the Programme Council of Chapter Zero Poland (part of the Climate Governance Initiative). It is a programme to develop the competencies of supervisory and management bodies of companies. It was created by the World Economic Forum. The aim of the Polish version is to raise awareness of the consequences of climate change for companies and the impact of business on the climate. Chapter Zero Poland was launched in May 2021 on the initiative of the Responsible Business Forum in substantive partnership with Deloitte Poland.

2. Francois Benaroya - Vice-Chairperson of the Supervisory Board

Graduate of the École Polytechnique and the École Nationale de la Statistique et de l'Administration Economique in Paris. He also holds a master's degree in economics from Tilburg University (Netherlands). He is also a graduate of the Kennedy School of Government at Harvard University. He started his career in 1994 at the Ministry of Finance in France as deputy director of the Emerging Markets Department. He then served as Economic Counsellor for Russia and the Commonwealth of Independent States at the French Embassy in Moscow. From 1999 to 2001, he was Director of the International Trade Analysis Department at the Ministry of Economy, Finance and Industry in France. Subsequently, he was Deputy Director of the Minister's Cabinet for European Affairs. He has been with the BNP Paribas Group since 2004, when he became Deputy Head of Corporate Banking Development. From 2007 to 2011, he worked for Ukrsibbank, a Ukrainian bank in the BNP Paribas Group, as Deputy Head of the Retail Banking Division, and then as Head of this Division and Vice President of the Bank's Management Board. Subsequently, he was Head of Retail Banking of the International Retail Banking business line of the BNP Paribas Group. In 2014, he became Managing Director for the integration of BNP Paribas Bank Polska and Bank BGŻ. From April 2015, he was Vice President of the Management Board of BNP Paribas Bank Polska S.A.. He was initially responsible for the Integration Area and, from September 2015, for the Retail and Business Banking Area. Since September 2017, he has been part of the IRB management of the BNP Paribas Group (current name Europe Mediterranean BNP Paribas), where he is responsible for the area of Central and Eastern Europe and Turkey. In addition, he is Chairperson of the Supervisory Board of Ukrsibbank, a member of the Supervisory Board of TEB AS and a member of the Supervisory Board of BMCI Morocco. Since 2018, he has been a member of the Supervisory Board of BNP Paribas Bank Polska S.A. and currently Vice-Chairperson.

3. Jean-Charles Aranda – Member of the Supervisory Board

Graduate of the University of Bordeaux, France, where he obtained a Master's degree in Internal Audit and Management Control with distinction. Certified Accountant. He started his career in 1998 at KPMG in Paris, where he was in charge of the banking financial audit area as a manager. From 2004 to 2009, he was Head of Mission in the Central Accounting Team of the Inspectorate General of BNP Paribas. His tasks included setting up a new audit team dedicated to financial audits. In 2009, he became Chief Financial Officer of BNP Paribas El Djazaïr in Algeria and then, from 2013, Chief Operating Officer of the Bank. From August 2016 to April 2017, he was Executive Director of the Management Accounting and Capital Management Department at BNP Paribas Bank Polska S.A.. From 2017 to 2023, he was Vice Chairperson of the Supervisory Board of BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A.. From April 2017 to July 2023, he was a member of the Management Board, then Vice-President of the Management Board of BNP Paribas Bank Polska S.A., responsible for the Finance Area.

4. Jarosław Bauc – independent member of the Supervisory Board until 2 July 2024.

Graduate of the University of Lodz and the University of Windsor in Ontario, Canada. He completed internships at the London School of Economics and the Wirtschafts-Universität Wien. From 1982 to 1991, as a doctor of economics, he was a researcher at the University of Łódź. From 1992 to 1997 he was an advisor and project manager at the Centre for Social and Economic Research (CASE). In 1995, he was a consultant to the National Bank of Estonia. In 1996, he was USAID advisor to the Ministry of Finance in Mongolia, in 1997. - in Romania, and in 2000. - in Georgia. From 1998 to 2000, he was Secretary of State and First Deputy to the Polish Minister of Finance. From 1998 to 2000, he was a member of the Monetary Policy Council. From 2000 to 2001, he was Poland's Minister of Finance. He served on the management and supervisory boards of a number of capital companies. In 2002-2003, he was Chairperson of the board of the Powszechnie Towarzystwo Emerytalne Skarbiec-Emerytura, in 2004-2005 - Skarbec Investment Management, in 2004-2005 - Skarbec Asset Management Holding, in 2004-2006 - Skarbec Towarzystwo Funduszy Inwestycyjnych. From 2006 to 2007 and from 2008 to 2011, he was President of the Management Board and CEO of Polkomtel, then a member of that company's Management Board. In 2013, he was vice-president of the Management Board of HAWA. Subsequently, from 2013 to 2015, he was Vice-President of the Management Board of Polskie Górnictwo Naftowe i Gazownictwo S.A. He has been associated with the BNP Paribas Group since 2010. In September 2014, he was appointed to

the Supervisory Board of BNP Paribas Bank Polska S.A. (then: BGŻ S.A.). He was Vice-Chairperson of the Supervisory Board of BNP Paribas Bank Polska S.A. until December 2020 and then a member of the Supervisory Board.

5. Małgorzata Chruściak – Independent member of the Supervisory Board

Graduate of the Faculty of Law and Administration at the University of Warsaw and postgraduate studies in coaching and mentoring at SWPS and the Psychoeducation Laboratory. She is a lawyer with over 20 years of experience in supporting business, which she gained, among others, as a partner and head of the banking practice while working at the largest international law firms in Warsaw: White & Case, CMS Cameron McKenna and EY Law. Since 2017, she has been working at EY Law Polska, specialising in advising on banking and finance and restructuring processes. She is recognised as a leading legal expert and recommended in the most prestigious legal rankings: Chambers Europe, IFRL and Legal 500, and works with the European Financial Congress (EFC). She is a practising business coach and mentor and is a member of the European Mentoring and Coaching Council and a member of the Association of Restructuring Practitioners. In 2020 she founded her own company "Mentoring for lawyers" combining legal practice and coaching/mentoring.

6. Magdalena Dzięwguć – independent member of the Supervisory Board until 21 November 2024.

Graduate of the Faculty of Law and Administration at the Adam Mickiewicz University in Poznań as well as the University of Minnesota and the Warsaw School of Economics. She also graduated from the European School of Law and Administration in Warsaw and completed postgraduate studies at the University of Humanities and Social Sciences (SWPS) and Harvard Business School. Between 1997 and 1999, she worked in the sales department at Scala Polska, a global leader in ERP software. She was then responsible for business development at Orange Polska. She worked in the Corporate Market Office of Orange B2B. From 2007 to 2012, she worked at Plus GSM as Director of the Strategic Customer Department, Director of the Business Sales Department, Director of the Key Customers Department, and then Managing Director of B2B - she was responsible for managing all B2B sales and sales support. From 2011 to 2012, she was an investment advisor at MCI Management (VC and Private Equity). From 2012 to 2014, she was marketing director and vice-president of the management board at Exatel. At that time she was responsible for sales, marketing, PR, product development and HR. Since September 2014, she has been working at Google and is director of Google Cloud business development in Central and Eastern Europe - Poland, Czech Republic, Slovakia and Hungary.



From 2012 to 2014, she was a member of the supervisory board of PGE Dystrybucja SA and Chairperson of the supervisory board of the Independent Interzone Operator (NOM). From 2012 to 2018, she was chairwoman of the Audit Committee of the LeaderShe Association. From 2014-2018 - member of the supervisory board of the Humanites Foundation. From 2016- 2019 - member of the Board of Trustees of SWPS. From June 2019, she was a member of the Supervisory Board of BNP Paribas Bank Polska SA.

7. Sophie Heller – member of the Supervisory Board

She graduated from ESSEC Business School, where she received her MBA. She started her professional career in 1988 as a consultant at Bain & Company. She founded Points Ciel, where she worked as marketing director from 1992 to 1997. From 1997 to 1998 she was CEO of Consodata and from 2000 to 2003 she was vice-president of marketing and e-business at Jakala. From 2003 to 2006, she was Chief Marketing Officer at Equilon, BNP Paribas Group's innovative consumer lending company, and then, from 2006 to 2009, she was Chief Marketing Officer at Mediatis, a multi-channel direct sales organisation. From 2009 to 2016, she worked at ING Direct, first as Vice President Marketing and Communications and then as General Manager of ING Direct. In 2016, she became COO of Retail Banking and Services at BNP Paribas Group. She has extensive experience in financial services (management, digitisation, innovation) and entrepreneurship.

8. Monika Kaczorek – independent member of the Supervisory Board from 3 July 2024.

Graduate of Applied Linguistics at the University of Warsaw. She also completed postgraduate studies in Market Analysis and Marketing at the Warsaw School of Economics and postgraduate studies in Business Psychology at the Leon Koźmiński Academy. She qualified as a chartered accountant in 2001. From 1994 to 2020, she worked for Mazars, an international audit and advisory network. In 2005, she became Partner and Vice President of the Management Board of Mazars Audit. She led the audit practice and was a leader in quality and risk management (internal audit, risk management and quality control of the Mazars network in Poland). She managed numerous teams auditing separate and consolidated financial statements, including financial institutions, listed entities, as well as performing other assurance and advisory services. She was a member of the Mazars International IFRS Committee and of the Mazars Group quality control teams. She has many years of experience in the audit of separate and consolidated financial statements, coordination of assurance and advisory engagements and supervision of strategic international projects such as mergers, acquisitions, due diligence, public listing. In addition, Monika Kaczorek was a

member of the National Council of Statutory Auditors from 2015 to 2023, including serving as vice-president of the National Council of Statutory Auditors from 2019 to 2023. Since 2021, she has served as an independent member of the Supervisory Board, and since 2023. Chairwoman of the Audit Committee of the insurance company TUiR Unum Życie S.A.. She is a member of the Council of the Reporting Standards Foundation of the Association of Stock Exchange Issuers and a member of the Chapter of the Best Annual Report Competition. She is also involved in leading projects and trainings related to ESEF, ESG and optimising the presentation of listed companies' financial statements to ensure compliance with IFRS and usability for stakeholders.

9. Vincent Metz – member of the Supervisory Board

Graduated in economics from the University of Paris - École Polytechnique and the École Normale Supérieure de Lyon. He started his career in 1993 at Compagnie Bancaire, which was renamed Paribas in 1997. At that time, he was director of financial models in the Planning and Development Department. From 1999, he was associated with the CETELEM Group, where he held a number of positions. He was Director of External Development, Director of CRM and Global B2C Analysis in the Sales Department, Director of Planning and Development in the Finance Department. In 2009, he became Director of Product Marketing in the Sales and Marketing Department at BNP Paribas Personal Finance. He continued his career within the structures of BNP Paribas Personal Finance. There, he served, among others, as Director of Marketing Analysis and Steering in the Sales and Marketing Department, Deputy Director of the Key Partners Department, and Deputy CEO of the PF Inside Area. He is currently Managing Director of Latin America and PF Inside Area and a member of the Executive Committee of BNP Paribas Personal Finance. She oversees BNP Paribas Personal Finance in six countries. She is an expert in managing development projects - external development, partner relationships. He specialises in financial services and has experience in sales and marketing, including finance and risk.

10. Piotr Mietkowski – member of the Supervisory Board

Graduate in economics from the University of Paris Dauphine. He completed postgraduate studies in International Economic Relations at the Institute of Political Science in Paris. He started his career as an economist, focusing on emerging markets and European issues. He then worked in the Business Development Department of BNP Paribas and in the Corporate Finance Department, where he was responsible for Central and Eastern Europe. He is currently Managing Director of Investment Banking in the BNP Paribas Group for Central and Eastern Europe, Greece, Turkey and Israel and a member of the

Supervisory Board of BNP Paribas Bank Polska S.A. (since September 2015) and member of the Supervisory Board of Ukrsibbank in Ukraine.

11. Khatleen Pauwels - member of the Supervisory Board

She obtained a degree in commercial engineering from the EHSAL Business School in Brussels in 2000. She started her career at Siemens IT Services, where she was responsible for the creation of the e-commerce portfolio. She then continued at Siemens Business Services, where she was project manager, sales portfolio manager and director of tendering and tendering. She also led the IT team for Outsourcing and Pre-Sales. Since 2007, she was associated with Fortis Bank. She then worked at BNP Paribas Fortis, where she held a number of positions. From 2010, she was head of the IT Resource Management and Strategic Sourcing Team. From 2013, she led more than a dozen process improvement initiatives in Distribution Channels and CRM, before becoming Director of Distribution Channels and CRM in the E2E Operations Area in 2015. In 2018, she took over the leadership of the Operations Department, which led the Retail and Business Customer Service. Since January 2020, she has been Managing Director of the E2E Operations Area (the so-called Customer Service Centre) and a member of the Executive Committee of BNP Paribas Fortis.

12. Jacques Rinino – Independent member of the Supervisory Board

Jacques Rinino completed his second degree in economics at the Pantheon Sorbonne University of Paris. In 1976, he joined Banque PARIBAS (now BNP Paribas) where he held a number of positions. From 1992 to 1997, he was Group Head of Commercial Banking and Private Banking at BNP Paribas China and Hong Kong. From 1998 to 2001 he was Head of Corporate Banking Risk for Europe, Mediterranean, Middle East and Africa at BNP Paribas Head Office and from 2001 to 2014 he was Head of Risk at BNP Paribas IRB responsible for risk in Retail Banking in Europe and Mediterranean and Retail Banking in the United States (Bank of the West - First Hawaiian Bank). He supervised risk in leasing (BNP Paribas Leasing Solutions), ARVAL and BNP Paribas Personal Finance and was a member of Global Risk Management EXCO. From 2011 to 2013, he was a member of the Board of BNP Paribas Lease Group. From 2014 to 2016, he was a senior advisor to BNP Paribas International Retail Banking (IRB) executives on the development of corporate strategy for retail banking in Europe and Asia. From 2014 to 2020, he was a member of the Board of TEB AS Bank (Turkey), then Chairperson of the Audit and Risk Committee of the bank. From 2020 to 2021, he was Chairperson of the Board of TEB ShA, a subsidiary of TEB in Kosovo, and from 2021 to January 2023. - independent member of the Board and Chairperson of the Risk Committee at BICICI, a BNP Paribas company in Côte d'Ivoire. In addition,



he has been Chairperson of BORGNI CONSEIL, a financial and corporate services consultancy, since 2016.

13. Mariusz Warych – independent member of the Supervisory Board

Graduated in Economics from the Faculty of Economics and Foreign Trade at the University of Łódź. He obtained a diploma in Finance and Accounting at the Hogeschool van Utrecht in the Netherlands. Between 1997 and 1998, he participated in the Association of Chartered Certified Accountants (ACCA) programme. He is a certified internal auditor with qualifications from the Certified Internal Auditor (CIA). From 1996 to 2002, he worked as an external auditor at Ernst & Young in New York, Toronto, Vancouver, London and Warsaw. From 2003 to 2004 he was CFO at Citileasing Sp. z o.o. and Handlowy-Leasing S.A., from 2004 to 2008 he was regional coordinator for Central Europe at KBC GROUP N.V. From 2008 to 2011 he was director of internal audit for Central, Eastern Europe and Russia at AVIVA. From 2011 to 2012, he was Director of Enterprise Risk Management at Deloitte Advisory and a member of the Supervisory Board and Audit Committee at Jastrzębska Spółka Węglowa S.A.. He was a financial advisor to the Canadian Polish Congress in Vancouver, where he also hosted a programme on NOFA Polish Radio. Since 2009, he has chaired the Audit Heads Club in Poland. He sits on the supervisory board and is Chairperson of the audit committee at Selena FM S.A. He is a specialist in: management, supervision and assessment of the effectiveness of business operations, identification and resolution of financial and operational weaknesses, management of risks related to the achievement of business objectives, internal audit, business training and independent membership of supervisory boards and audit committees. He has been a member of the Supervisory Board of BNP Paribas Bank Polska S.A. since June 2013.

Committees of the Supervisory Board

The Supervisory Board sets up internal Committees, which consist of members of the Supervisory Board. The Committees have a consultative and advisory function for the Supervisory Board and are intended to improve its work. For this purpose, the Committees prepare opinions, recommendations and proposals for decisions on applications received by the Supervisory Board in a working procedure. The scope and procedure of the Committees are defined in their bylaws, which are introduced by the Supervisory Board in the form of a resolution.

Committees of the Bank's Supervisory Board:

- Audit Committee

- Risk Committee
- Remuneration Committee
- Nominations Committee

The composition of the Supervisory Board and the composition of the Committees of the Bank's Supervisory Board as at 1.01.2024 and 31.12.2024 is presented in tables 166 and 167 together with information on the independence of the members.

Audit Committee

The Audit Committee supports the Supervisory Board in monitoring the integrity of financial information, the effectiveness of the internal control system and the monitoring of the performance of auditing activities. It is responsible for ensuring the effectiveness of the Bank's internal audit function and therefore oversees the activities of the Internal Audit Division. It ensures the flow of information and ensures good cooperation between the external auditor (statutory auditor), internal audit and the Supervisory Board. The Audit Committee prepares annual reports on its activities. It includes a risk assessment of the areas it oversees and evaluates the effects of its activities. In addition, the Audit Committee supervises the activities of the auditor and periodically evaluates its work. The Audit Committee has been established by the Supervisory Board in accordance with the legal provisions concerning the appointment, composition and functioning of the Audit Committee, as well as the independence of its members and the fact that they possess the appropriate knowledge and skills, knowledge of accounting and auditing principles.

Composition of the Audit Committee

The Audit Committee consists of five members, three of whom are independent members of the Supervisory Board. They meet the independence criteria referred to in the "Regulation of the Minister of Finance on the Audit Committee" and § 16(4) of the Bank's Statutes, as well as in the "Act on Statutory Auditors, Audit Firms and Public Supervision". The competence of the Committee members, to the extent necessary for the proper fulfilment of their functions, is analysed in detail and confirmed in the suitability assessment process.

Following Mr Jarosław Bauc's resignation as a member of the Bank's Supervisory Board with effect from 2 July 2024, the Supervisory Board appointed Mrs Monika Kaczorek as a member of the Audit Committee.

Composition of the Audit Committee as at 31 December 2024:

- Mariusz Warych - Chairperson of the Committee (independent member)
- Lucyna Stańczak-Wuczyńska - member of the Committee (independent member)
- Monika Kaczorek - member of the Committee (independent member)
- Francois Benaroya - member of the Committee
- Jean-Charles Aranda - member of the Committee

All members of the Audit Committee have adequate knowledge, competence and many years of experience in the financial and accounting areas:

- **Mariusz Warych** – competence in accounting, auditing and internal auditing, confirmed by his CIA diploma. Participant of the ACCA Coursework programme. Many years of experience as an independent member of supervisory boards and audit committees (JSW, Selena FM, Ukrsibbank Ukraine). External auditor at Ernst & Young - auditing banks in Poland, UK, Canada and USA. Evaluated the functioning of Audit Committees. Chairperson of the Audit Heads Club in Poland. Gained knowledge and skills as CFO at Citi Group - in leasing companies, as well as regional coordinator at KBC Group - overseeing KBC Group's activities in Poland.
- **Lucyna Stańczak-Wuczyńska** – education in economics and 30 years of experience in banking and finance, gained while working in the banking sector, in commercial banking and the EBRD. She has held a number of corporate governance roles, was a member of supervisory boards (or observer) and a member of audit and risk committees (e.g. Alior Bank). She has gained industry knowledge and skills from managing (as Director of the EU Banks Team at EBRD in London) for many years the portfolio (debt and equity) of a significant group of banks in 12 EU countries, Central and Southern Europe.
- **Jarosław Bauc** – member of the committee until 2 July 2024 - Doctor of economic sciences. He gained his experience sitting on the management and supervisory boards of a number of capital companies (Powszechnie Towarzystwo Emerytalne Skarbiec-Emerytura, Skarbiec Investment Management, Skarbiec Asset Management Holding and Skarbiec Towarzystwo Funduszy Inwestycyjnych, Polkomtel, HAWA, PGNiG). He has a comprehensive knowledge of finance and banking at home and abroad.



- **Monika Kaczorek** – member of the Committee since 3 July 2024 - is a graduate of Applied Linguistics at the University of Warsaw. She was qualified as a statutory auditor in 2001. She has long-standing experience in auditing separate and consolidated financial statements, coordination of assurance and advisory assignments, and supervision of strategic international projects such as mergers, acquisitions, due diligence, introduction of companies to public trading. gained, among others, in the international audit and advisory network Mazars, where she also served as Partner and Vice President of the Management Board of Mazars Audit. She was a member of the National Council of Statutory Auditors, where she also served as Vice President of the National Council of Statutory Auditors. She is a member of the Council of the Reporting Standards Foundation of the Association of Stock Exchange Issuers and a member of the Chapter of the Best Annual Report Competition.

- **Francois Benaroya** – economic background. He gained his banking knowledge and experience during his long-term employment in the banking sector in senior positions within the BNP Group. He was a member of the Management Board of BNP Paribas Bank Polska S.A. responsible for the Integration Area, then for the Retail and Business Banking Area. He serves on the Supervisory Boards (Ukrsibbank Ukraine, TEB AS, BMCI Morocco) and on the Management Board of Europe Mediterranean BNP Paribas, where he is responsible for the area of Central and Eastern Europe and Turkey.

- **Jean-Charles Aranda** – economic education with specialisation in Internal Audit and Management Control. Chartered Accountant. He gained experience at KPMG in Paris, where he was in charge of the banking financial audit area as a manager. For many years, he was Head of Mission in the Central Accounting Team of the Inspectorate General of BNP Paribas, where he created a new audit team dedicated to financial audits. He was Chief Financial Officer and Chief Operating Officer of BNP Paribas El Djazaïr in Algeria. Since 2017, he has been associated with BNP Paribas Bank Polska S.A., initially working as Executive Director of the Management Accounting and Capital Management Department and then as Vice President of the Management Board, responsible for the Finance Area. He also served as Vice Chairperson of the Supervisory Board of BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A.

Detailed information on the background and professional experience of the Committee members is provided in the Supervisory Board section and on the Bank's website <https://www.bnpparibas.pl/o-banku/rada>

Permanent members of the Audit Committee also attend the meetings:

- Member of the Management Board who oversees the Finance Area,

- a member of the Management Board who oversees the Risk Area,
- Managing Director of the Internal Audit Division,
- Managing Director of the Compliance Monitoring Division.

Meetings of the Audit Committee

The Audit Committee meets at least four times a year or more frequently as required by its tasks, including each time before the publication of the Bank's results and financial reports.

In 2024, 14 Audit Committee meetings were held, eight of them by written procedure, at which, among other things, the following were discussed and approved:

- Financial statements for 2023,
- Report on the activities of the Bank Group for 2023,
- Report on non-financial information for 2023,
- Quarterly and half-yearly reports on financial performance in 2023,
- Information on the capital adequacy of the BNP Paribas Bank Polska S.A. Group,
- provision of additional services by the audit firm,
- audit plan for the financial statements,
- the action plans of the Internal Audit Division and the Compliance Division,
- annual and periodic reports on the activities of the Internal Audit and Compliance Divisions,
- annual report on the evaluation of the adequacy and effectiveness of the internal control system,
- periodic reports on the status of the monitored audit recommendations and on the implementation of the FSC's recommendations,
- BION results,
- Annual and periodic reports on complaints, claims and applications handled at the Bank,

- a report on compliance with ethical principles and the results of a review of breaches of internal regulations or applicable law by employees or business units of the company,
- information on the Bank's compliance with the "Best Practices for WSE Listed Companies 2021" and the financial information communication process in 2023,
- annual reports on the operation of the compliance oversight system in the Brokerage Office and the Trust Services Department,
- the results of the review of the accounting and reporting process and the management accounting system,
- annual report on the activities of the Bank's Audit Committee to the Supervisory Board.

In addition, the Committee periodically evaluated the performance of the external auditor. It discussed and reviewed updated regulations in the areas of accounting, auditing and compliance and recommended them to the Supervisory Board for adoption.

In 2024, all members of the Audit Committee actively participated in the Committee's meetings and showed a high commitment to the proper performance of their duties. The overall attendance of Committee members at meetings was 99%. The number and duration of meetings, as well as access to resources, were sufficient to enable the Audit Committee to fully discharge its responsibilities.

Oversight by the Audit Committee of the selection of the audit firm

The Audit Committee supervises the activities of the auditor. It makes recommendations to the Supervisory Board on the appointment or termination of the services of the auditor. It monitors compliance with the principle of the auditor's independence and objectivity and the rules of information exchange. In addition, the Committee periodically evaluates the performance of the external auditor.

The Supervisory Board in September 2017 adopted the documents prepared by the Audit Committee:

- "Policy on the selection of the audit firm at BNP Paribas Bank Polska S.A.",
- "Procedure for selecting the audit firm at BNP Paribas Bank Polska S.A.",



- "Policy on the provision of permitted non-audit services at BNP Paribas Bank Polska S.A. by the audit firm, by affiliates of the audit firm and by members of the audit firm's network".

In September 2024, the "Policy for the selection of the audit firm at BNP Paribas Bank Polska S.A." was updated. and the "Procedure for the selection of the audit firm at BNP Paribas Bank Polska S.A.".

These documents set out such rules to ensure that the selection of the audit firm is carried out correctly and in accordance with the applicable legislation. Below are the most important rules:

- maintaining the independence of the audit firm and the key auditor,
- the application of transparent and non-discriminatory evaluation criteria for the selection of the audit firm during the tender process,
- ensuring that the principles of appropriate rotation of audit firms and the key auditor are maintained, including grace periods.

The main objective of the "Policy on the provision of permitted non-audit services at BNP Paribas Bank Polska S.A. by the audit firm, by affiliates of the audit firm and by members of the audit firm's network" is to analyse the compliance of the additional service with legal regulations, as well as to control and monitor the independence of the key auditor and the audit firm. The policy allows for the provision of permitted services, to the extent not related to the Bank's fiscal policy, following an analysis of independence and approval of their provision.

In 2024, the audit firm Mazars Audyty Sp. z o.o., authorised to audit and review the separate financial statements of BNP Paribas Bank Polska S.A. and the consolidated financial statements of the BNP Paribas Bank Polska S.A. Group, together with the 2023 reporting packages, provided the Bank with a permitted non-audit service in respect of the provision of an attestation service concerning the assessment of the 2023 Statement of Remuneration of the Supervisory Board and the Board of Executives.

As a result of the auditor selection process initiated in 2023, Ernst & Young Audyty Polska spółka z ograniczoną odpowiedzialnością sp.k. was selected by a resolution of the Supervisory Board dated 15 September 2023 to review and audit the financial statements of the Bank and the Bank Group, including packages, for the years 2024-2025.

The audit firm Ernst & Young Audyty Polska, authorised to audit and review the stand-alone financial statements of BNP Paribas Bank Polska S.A. and the consolidated financial statements of the BNP Paribas Bank Polska Group, together with the reporting packages, has been providing services to the Bank since 2024.

In 2024, the audit firm Ernst & Young Audyty Polska spółka z ograniczoną odpowiedzialnością sp.k., which audits the financial statements, provided the following authorised non-audit services to the Bank in respect of the review of the Bank's and the Bank Group's financial reports and consolidation packages:

- Providing an assurance service for the evaluation of the 2024 Sustainability Report,
- the provision of a service to assess the compliance of qualitative and quantitative information on the capital adequacy of the Bank Group as at 30 June 2024 and 31 December 2024 in accordance with the CRR Regulation.

The Sustainability Report ("ESR") has been prepared in accordance with the Sustainability Reporting Standards as set out by the European Commission by means of delegated acts issued pursuant to Article 29b(1) of Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC (Official Journal of the EU L 182, 29.06.2013, p. 19, as amended. ("European Sustainability Standards", "ESRS") introduced by the Act of 6 December 2024 amending the Accounting Act, the Act on statutory auditors, audit firms and public supervision and certain other acts (the "Accounting Act").

Risk Committee

The Risk Committee supports the Supervisory Board in overseeing the area of risk management. The Committee gives its opinion on the Bank's overall current and future risk appetite. It gives its opinion on the risk management strategy for the Bank's activities and on the information submitted by the Board of Management on the implementation of this strategy. Together with the Supervisory Board, it oversees the implementation of the risk management strategy in the Bank's activities by senior management. The Risk Committee verifies that the prices of liabilities and assets offered to Customers fully reflect the Bank's business model and its risk strategy. In the event that these prices do not adequately reflect the risks, in line with the risk management model and

strategy - the Committee proposes to the Bank's Management Board such solutions so that the prices of liabilities and assets are appropriate to the risks.

Each year, the Committee presents an annual report on its activities to the Supervisory Board.

Composition of the Risk Committee

The Committee consists of at least three persons - appointed from among the members of the Supervisory Board.

Composition of the Risk Committee as at 31 December 2024:

- Jacques Rinino - Chairperson of the Committee (independent member)
- Francois Benaroya - Member of the Committee
- Małgorzata Chruściak - Member of the Committee (independent member)
- Lucyna Stańczak-Wuczyńska - Member of the Committee (independent member)
- Mariusz Warych - Member of the Committee (independent member)

Four members of the Risk Committee, together with the Committee Chairperson, meet the criteria for independence in accordance with the "Act on Statutory Auditors, Audit Firms and Public Supervision".

Risk Committee meetings

The Risk Committee shall meet at least four times a year. The dates of the meetings are set by the Chairperson of the Committee. In 2024, the Risk Committee held seven meetings, three of which were in writing. During the meetings, the Risk Committee discussed periodic reports on:

- credit risk,
- integrated risks,
- market and liquidity risks, recovery plan metrics, risk appetite metrics, risks of investments undertaken as part of the Investment Strategy, ESG risks,
- operational risk, internal control and fraud prevention,
- ALMT risks,
- legal risks,



- the current situation regarding the CHF mortgage portfolio.

In addition, the Committee gave opinions and recommended resolutions to the Supervisory Board, which included:

- risk appetite at BNP Paribas Bank Polska S.A.,
- the investment strategy of BNP Paribas Bank Polska S.A.
- BNP Paribas Bank Polska S.A.'s capital plan for 2024-2026,
- the BNP Paribas Bank Polska S.A. contingency capital plan,
- Capital Management Policy at BNP Paribas Bank Polska S.A.,
- operational risk management and internal control strategy at BNP Paribas Bank Polska S.A.,
- updated Rules of Procedure of the Risk Committee,
- BNP Paribas Bank Polska S.A. Recovery Plan,
- Risk Management Strategy at BNP Paribas Bank Polska S.A.,
- Policies for the estimation of internal capital at BNP Paribas Bank Polska S.A.

The Risk Committee also discussed the issue of AT1 capital instruments and recommended that the Supervisory Board adopt a resolution on the issue of AT1 capital instruments.

In 2024, the Committee paid particular attention to the issues:

- legal risks in particular related to litigation concerning foreign currency/CHF-denominated loans, the Bank's activities as depositary and the sanction of free credit,
- regarding the situation with the CHF mortgage portfolio and the progress of voluntary settlements,
- phishing risks,
- ESG risks and issues of issuance of the Bank's portfolio,
- impact of CRR3 and Basel IV on the Bank, capital requirements and RWAs

The number of Committee members attending each Risk Committee meeting allowed all Committee meetings to run properly in 2024. The attendance rate of the Committee members was 100%.

Remuneration Committee

The Remuneration Committee supports the Supervisory Board in its oversight responsibilities in the area of human resources management. It monitors and supervises key processes, in particular with regard to human resources policy, employee professional development and remuneration policy. The Committee's remit includes, among other things: analysing the performance of the members of the Management Board and proposing recommendations to the Supervisory Board in this regard, as well as recommending key performance indicators to the Board for the members of the Management Board. In addition, the Committee gives its opinion and monitors succession plans for key positions in the Bank, monitors the level and structure of the remuneration of key positions in the Bank. Each year, the Committee provides the Supervisory Board with an update on the Bank's employment and remuneration structure and an annual report on its activities.

Composition of the Remuneration Committee

The Committee consists of at least three members appointed from among the members of the Supervisory Board.

Following Mrs Magdalena Dziejguć's resignation as a member of the Bank's Supervisory Board with effect from 21 November 2024, the Supervisory Board appointed Mrs Małgorzata Chruściak as a member of the Remuneration Committee.

Composition of the Remuneration Committee as at 31 December 2024:

- Lucyna Stańczak-Wuczyńska - Chairperson (Independent member)
- Francois Benaroya - Member of the Committee
- Małgorzata Chruściak - Committee member (independent member) as of 5 December 2024.
- Magdalena Dziejguć - Committee member (independent member) until 21 November 2024.

Two members, including the Chairperson, meet the criteria for independence, in accordance with the "Act on Statutory Auditors, Audit Firms and Public Supervision".

Remuneration Committee meetings

Meetings of the Remuneration Committee shall be held at least twice a year or as often as necessary for the effective fulfilment of the Committee's tasks and mission. The dates of the meetings are set by the Chairperson of the Committee. In 2024, the Remuneration Committee held seven meetings, three of which were in writing.

During the meetings, the Committee discussed:

- Annual objectives of the members of the Bank's Management Board and the assessment of the achievement of these objectives,
- principles for the remuneration and variable remuneration of the members of the Management Board and those in charge of audit and compliance,
- the Bank's employment and remuneration report 2023,
- issued an opinion on the Report on the remuneration of the members of the Management Board and the Supervisory Board of BNP Paribas Bank Polska S.A. for the year 2023,
- issued an opinion on the evaluation of the application of the Remuneration Policy at the Bank,
- issued an opinion on the terms and conditions of the issue of series A5 subscription warrants issued pursuant to resolution No. 5 of the Extraordinary General Meeting of 31 January 2020 (as amended) and the determination of the terms and conditions of the issue of series B2 subscription warrants issued pursuant to resolution No. 39 of the Annual General Meeting of 27 June 2022.
- issued an opinion on the pricing conditions for credit products to certain members of the Management Board,
- issued an opinion on the amendments to the Remuneration Committee Regulations,
- discussed the Remuneration Reports for the members of the Management Board and the Supervisory Board of BNP Paribas Bank Polska S.A. for the year 2023,



- prepared and discussed the annual report on the Remuneration Committee's activities for the Supervisory Board.

Nominations Committee

The Nominations Committee supports the Supervisory Board in assessing the qualifications of candidates for members of the Bank's Management Board and Supervisory Board. Together with the Supervisory Board, the Nominations Committee determines the criteria that are used to select the members of the Management Board and Supervisory Board. The criteria take into account: the knowledge, competence and expected commitment in terms of time commitment required to perform the function. In addition, the Committee determines the responsibilities of the candidate for the Bank's Management Board. The Nominations Committee periodically assesses the knowledge, competence and experience of the Bank's Management Board as a whole and of the individual members of the Bank's Management Board at least once a year. It also evaluates the structure, size, composition and effectiveness of the Bank's Management Board and then makes recommendations to the Supervisory Board for any changes in this respect. In addition, the Nominating Committee makes an individual assessment of the suitability (initial and interim) of the members of the Supervisory Board and a collective assessment of the suitability of the Supervisory Board as a whole. The assessment of individual and collective suitability is performed at least once a year and in situations indicated in the Policy of the Bank for the Assessment of Suitability of the Members of the Supervisory Board of BNP Paribas Bank Polska S.A., including, among others, in the event of a nomination of candidates for the Supervisory Board members (prior to the appointment of a given person to perform a given function), in the event of changes in the composition of the Supervisory Board or a material change in the Bank's business model.

The Nominations Committee reviews and monitors the effectiveness of the Bank's Suitability Assessment Policy for members of the Supervisory Board and the Suitability Assessment Policy for members of the Management Board and employees performing key functions at the Bank. The Nominations Committee periodically reviews the policy and makes recommendations for changes to the Supervisory Board. In addition, the Committee oversees key processes such as succession plans, the policy for the appointment and removal of members of the Management Board and members of the Supervisory Board, and the professional development of employees. It makes recommendations to the Supervisory Board on the appointment and succession process for key positions and on recommendations to reduce or increase the number of members of the Bank's Management Board.

Composition of the Nominations Committee

The Nominations Committee consists of at least three persons appointed from among the members of the Supervisory Board. The members of the Nominations Committee must have the necessary knowledge, competence and experience to be able to properly assess the composition of the Management and Supervisory Boards and the recommended candidates for the Management and Supervisory Boards. As part of the suitability assessment, which is carried out on a cyclical basis once a year or in the event of other circumstances resulting in the need for an assessment, an assessment of their knowledge, skills and professional experience (i.a. in ESG risk management) is carried out. A detailed criteria matrix is attached as an appendix to the Suitability Assessment Policy for the members of the Supervisory Board of BNP Paribas Bank Polska SA.

Following Mrs Magdalena Dziejguć's resignation as a member of the Bank's Supervisory Board with effect from 21 November 2024, the Supervisory Board appointed Mrs Małgorzata Chruściak as a member of the Nominations Committee.

Composition of the Nominations Committee as at 31 December 2024:

- Lucyna Stańczak-Wuczyńska - Chairwoman of the Committee (independent member)
- Francois Benaroya - Member of the Committee
- Małgorzata Chruściak - Committee member (independent member) from 5 December 2024.
- Magdalena Dziejguć - Committee member (independent member) until 21 November 2024.

Two members, including the Chairperson, meet the criteria for independence, in accordance with the "Act on Statutory Auditors, Audit Firms and Public Supervision".

Meetings of the Appointments Committee

Meetings of the Committee shall be held as often as necessary for the effective fulfilment of the Committee's mission, but at least twice a year. The dates of the meetings are set by the Chair of the Nominations Committee. In 2024, the Nominations Committee held five meetings.

During the meetings, the Committee:

- carried out a periodic assessment of the individual and collective suitability of the members of the Supervisory Board and the members of the Bank's Management Board. The Committee confirmed positive assessments of the individual suitability as well as the collective suitability of the members of the Board of Management and the Supervisory Board,
- carried out an assessment of the individual suitability of candidates for Supervisory Board members and an additional assessment of the collective suitability of the Supervisory Board,
- assessed the individual suitability of candidates for Supervisory Board committees and an additional assessment of the collective suitability of individual committees,
- adopted and presented to the Supervisory Board a recommendation on the target number of Management Board members,
- discussed the proposal of successors to critical positions from the level of Management Board members and Executive Directors.
- issued an opinion on the amendments to the Rules of Procedure of the Nominations Committee,
- prepared and discussed the annual report on the activities of the Nominations Committee for the Supervisory Board.

Management Board of the Bank

Principles of the Management Board

The Bank's Management Board is the management and executive body that operates on the basis of applicable laws, the Bank's Statutes and the Regulations of the Management Board. As of 1 January 2020. The Bank's Management Board has nine members and this is in accordance with the Bank's Statutes. The Supervisory Board decided on 7 December 2023 to set the number of members of the Management Board at eight as of 1 January 2024. The members of the Management Board - president and vice-presidents - are appointed by the Supervisory Board for a joint term of office of three years. The terms of office of the members of the Management Board expire at the end of their term of office, on the date of the General Meeting approving the financial statements for the last full financial year in which they served as members of the Management Board. In addition, the Supervisory Board, acting on the basis of the "Policy for the Appointment and Dismissal of Management Board Members", may dismiss or suspend a Management Board member at any time. The members of the



Management Board must have the knowledge and experience to manage the Bank in a stable and prudent manner. At least half of the members of the Bank's Management Board shall be persons who are well acquainted with the banking market in Poland, i.e. who live in Poland permanently, speak Polish and have experience on the Polish market.

The Management Board deals with all matters of the Bank which are not reserved by law and which do not fall within the competence of other bodies of the Bank. A detailed description of the activities, including the scope of competences of the Management Board, is set out in § 22(2) of the Bank's Statutes and in the Regulations of the Bank's Management Board.

A list of the most important matters dealt with by the Management Board:

- prepares a draft strategy for the management of the Bank and presents it to the Supervisory Board for approval and monitors the implementation of the strategy,
- prepares the financial plan and adopts reports on its implementation,
- adopts the reports on the Bank's activities, the Bank's financial statements and the Group's management and consolidated financial statements,
- defines human resources policy, in particular remuneration rules, structure and profile of employment, social policy rules,
- defines the Bank's product policy,
- determines the organisational structure of the Bank,
- identifies the areas of management overseen by individual Board members,
- establishes a policy for the identification of key functions and the appointment and removal of persons to perform those functions,
- sets out ethical principles defining norms and standards of ethical conduct for members of the Bank's bodies and employees, as well as for other persons through whom the Bank conducts its business,
- establishes and abolishes the Bank's committees and determines their respective competences,
- appoints proxies,
- establishes rules for the operation of internal control and audit,

- establishes a risk management strategy including policies and procedures for identifying, assessing, controlling and monitoring risks and reporting on risks,
- decides on the purchase or sale of real estate, a share in real estate or the right of perpetual usufruct, if their value is lower than PLN 10,000,000 (ten million) but higher than PLN 5,000,000 (five million); however, it is stipulated that a resolution of the Management Board is not required if the purchase and sale of real estate, a share in real estate or the right of perpetual usufruct is related to the satisfaction of the Bank's claims against its debtor, securing the Bank's receivables or a leasing agreement in which the Bank acts as the financing party, including in particular in the case of acquisition in fulfilment of the leasing agreement, disposal after the expiry of the leasing term or during the leasing term and disposal after termination of the leasing agreement concerning a given real property, a share in a real property or the right of perpetual usufruct, regardless of the value of the real property, the share in a real property or the right of perpetual usufruct,
- decides on the incurrence of a liability or disposition of a right, the aggregate value of which in relation to one entity exceeds 5% of own funds.

In 2024, in addition to the aforementioned topics, the Bank's Management Board focused its attention and work on issues relating to the CHF mortgage portfolio, the change from the WIBOR to the WIRON benchmark, ESG risk and its impact on the Bank's business, issues relating to the Cybersecurity area, operational efficiency and issues relating to ethics and standards of conduct.

The Bank's Management Board manages the Bank's affairs and represents the Bank externally. The Bank's Statutes specify how the Management Board represents the Bank. Pursuant to § 26 of the Bank's Statutes, declarations of intent on behalf of the Bank may be made by:

- two members of the Management Board who act jointly or one member of the Management Board who acts jointly with a proxy or attorney acting within the limits of the power of attorney granted,
- two proxies acting jointly,
- attorneys acting alone or jointly within the limits of the powers granted.

The Bank's Statutes did not grant the Management Board any specific powers to issue or repurchase shares. However, on 31 January 2020. The Extraordinary General Meeting of the Bank conditionally authorised the Management Board to purchase the Bank's own shares in the company from persons covered by the incentive programme. The EGM agreed that the Management Board should

create a reserve capital to be used entirely for the purchase of own shares. The EGM's decision came into effect after the FSA's approval of the above actions.

Decisions of the Management Board shall take the form of resolutions and shall be adopted by an absolute majority of votes cast in the presence of at least half of the members of the Management Board. Meetings of the Management Board are normally held once a week or more frequently as required.

The members of the Management Board meet for the Management Board meeting at the Bank's Head Office and also take decisions by means of direct remote communication.

Management Board meetings in 2024 were held in a hybrid model. The Management Board in 2024 held 62 meetings, including 10 written votes. The Management Board members passed 140 resolutions.

On 29 February 2024, the Bank's Supervisory Board adopted a resolution to set the number of members of the Bank's Management Board for the new term of office at eight persons and appointed the Bank's Management Board for a new three-year term of office with its current composition.

Table 169. Composition of the Bank's Management Board as at 31.12.2024, together with the division of the functional responsibilities of the individual members

name	function on the Bank's Management Board	supervised area
Przemysław Gdański	CEO	Area of Bank Management, Strategy and Agricultural Markets, Area of Human Resources Management, Area of Transformation, Area of Sustainability
André Boulanger	Vice-President	Banking area CIB
Małgorzata Dąbrowska	Vice-President	Operations and Business Support Area
Wojciech Kembłowski	Vice-President	Risk area
Piotr Konieczny	Vice-President	Finance area



name	function on the Bank's Management Board	supervised area
Magdalena Nowicka	Vice-President	The area of New Technologies and Cybersecurity
Volodymyr Radin	Vice-President	Banking area Personal Finance (PF) Retail and Business Banking area
Agnieszka Wolska	Vice-President	SME and Corporate Banking area

The competences and professional experience of the individual members of the Bank's Management Board are presented on the Bank's website at <https://www.bnpparibas.pl/o-banku/wladze-banku>.

The composition of the Management Board is appropriate in terms of numbers to the structure and area of the Bank's activities and complies with the suitability criteria, both individually and as a whole body, which contributes to the effective management of the Bank.

The appointment of a member of the Management Board is possible if the candidate meets the statutory and regulatory requirements and has received a positive suitability assessment. In the process of recruiting a candidate for the position of a member of the Bank's Management Board, the Supervisory Board is assisted by the Nominations Committee and the Executive Director of the Human Resources Area. Appointment as a member of the Management Board by the Supervisory Board is preceded by:

- carrying out the adequacy assessment process,
- receiving a recommendation from the Nominations Committee.

There were no changes to the composition of the Bank's Management Board between 1 January and 31 December 2024.

Members of the Bank's Management Board

1. Przemysław Gdański – Chairperson of the Management Board

Graduate of the Faculty of Foreign Trade at the University of Gdansk and a one-year programme in international banking and finance at Loughborough University, UK. He completed the Advanced Management Program (AMP) at IESE

Business School and a number of professional and managerial development programs at Harvard Business School, London Business School, University of California, Berkeley - Haas School of Business, Ashridge - Hult International Business School and HEC, among others. He has been involved in banking for over 28 years. From 1993 to 1995, he worked at IBP Bank SA, then at ABN AMRO Bank in Poland, Romania and the head office in Amsterdam. From 2002 to 2006, he was managing director, heading the Large Companies Area at Bank BPH SA. From May to November 2006, - CEO and General Manager of Calyon Bank Poland and Calyon Branch in Poland. In November 2006, he became Vice-President of the Management Board of Bank BPH, where he was responsible for corporate banking and real estate financing. Subsequently, he was Vice President of the Management Board of Pekao SA, responsible for the Corporate Banking, Markets and Investment Banking Division. From 2008 to 2017, he was a member of the Management Board and Vice-President of mBank, where he was responsible for the Corporate and Investment Banking Division. Since November 2017, he has been in charge of BNP Paribas Bank Polska S.A. and serves as Territory Head - overseeing BNP Paribas Group companies operating in Poland. She has been a long-time patron of initiatives to promote diversity, gender equality and to support the activities and promote the professional development of women.

Top management makes every effort to broaden its range of competences in the areas of sustainability, climate change and climate policy at advanced international training courses (e.g. Cambridge Institute for Sustainability Leadership) and meetings with recognised experts and researchers. CEO Przemysław Gdański graduated in 2021 from the IESE Business School in Madrid in Sustainability.

2. André Boulanger – Vice-President of the Management Board

He graduated with honours from the Université Libre de Bruxelles in Belgium. He started his career in 1986 at Crédit Communal de Belgique (now Belfius Bank), where he worked until 1989. He then became branch manager of Banque Paribas Belgium in Brussels and later deputy head of the Risk Department at Banque Paribas Belgium. From 1994 to 1998, he was vice-president of Banque Paribas France, where he was responsible for commercial banking in the European subsidiaries. From 1998 to 2000, he was managing director of the Corporate

Banking Area at Banque Paribas Belgium. Following the merger of BNP and Paribas in 2000, he became Managing Director of the Corporate and Investment Banking Area. From 2002, he continued his career at BNP Paribas in France as managing director of the Acquisition Finance Transactions and Structured Loans Area in the Continental Europe region. In 2005, he became Managing Director of the Corporate Banking Area in Central and Eastern Europe at BNP Paribas in France and in 2007, General Manager of the Corporate and Transaction Banking Area. From 2010 to 2014, he became CEO and Chairperson of the Board at BNP Paribas in the Netherlands. In 2014, he became Managing Director of the Corporate Banking Operations Area in the Europe region and in 2015 Managing Director of the EMEA Operations Area. Since 2017, he was CEO of BNP Paribas JSC and CEO for the Russian Federation area. Since November 2018, he has been Vice President of the Management Board of BNP Paribas Bank Polska S.A. responsible for the CIB Banking Area.

3. Małgorzata Dąbrowska – Vice-President of the Management Board

Graduate of the Cracow University of Economics and Executive MBA studies at ESCP Business School in Paris. She completed a number of specialised training and development programmes also certified by foreign universities - HEC, The University of Texas at Austin, George Washington University. She is an experienced leader who has successfully implemented complex organisational and technological transformations also in the process of bank mergers. She has more than 25 years of experience in the banking sector in the areas of operations, finance, business support, technology and transformation. She started her professional career at First Polish-American Bank SA, which was acquired by BNP Paribas in 2010 after successive mergers with Fortis Bank and Dominet Bank. Her roles included Director of the Project Management Department, Director of IT Programmes, Director of the Business IT Systems Development Department. During the operational merger of BGŻ BNP Paribas, she was director of the Systems Migration Department. From 2018 to 2021, she was Managing Director of the IT Systems Development Division for the Retail Customer. In January 2022, she took on the role of leader of the Open & Beyond Banking Tribe, and additionally served as leader of the Candidate and Employee Experience Tribe from December 2022 to April 2023. Since 1 January 2024, she has been Vice President of the Management Board of BNP Paribas Bank Polska S.A. overseeing the Operations and Business Support Area.



4. Wojciech Kębłowski – Vice-President of the Management Board

Graduated in economics from the Faculty of Finance and Statistics at the Warsaw School of Economics. He completed management trainings organised, i.a., by Harvard Business School and executive trainings prepared by Raiffeisen Bank International AG. At the beginning of his professional career - in the years 1993-1997 - he was associated with CSBI in the Sygnity group, where he was a manager of analyses in the Financial Department. Subsequently, he worked at Raiffeisen Bank Poland, initially from 1997 to 2000 as a financial analyst and account manager, and then from 2000 to 2003 as a manager of Risk Management. From 2003 to 2008, he was director of the Credit Risk Department of Raiffeisen Bank Polska, where he was responsible for the corporate area - corporates and medium-sized enterprises, financial institutions. From 2008 to 2011, he was director and then managing director of the Credit Risk Area at Raiffeisen Bank Polska. Since 2011, he was associated with BNP Paribas Bank Polska, where he became a member of the Management Board and Managing Director of the Risk Area (Chief Risk Officer). Since May 2015, he has been Vice President of the Management Board of BNP Paribas Bank Polska S.A. and is responsible for the Risk Area.

5. Piotr Konieczny – Vice-President of the Management Board

Graduated from the Faculty of Banking and Finance at the University of Szczecin, where he obtained a Master's degree in Economics. Subsequently, he obtained a PhD in Banking and Finance at the Warsaw School of Economics. During his career he has attended numerous courses in management, leadership and sustainability. He has over 30 years of business experience in risk and finance functions. At the beginning of his career, he was associated with the Department of Econometrics and Statistics at the University of Szczecin. From 1995 to 1997, he was a market risk controller in the Treasury Department of PBKS S.A., part of the Pekao S.A. Group. From 1997, he was associated with Raiffeisen Bank Polska S.A., holding successive positions as balance sheet risk manager, director of the Asset and Liability Management Office, managing director of the Risk Management Department. In 2007, he took up the position of Member of the Management Board responsible for the Risk and Finance Areas (Chief Risk Officer/Chief Financial Officer), and from 2012 he was Member of the Management Board responsible for the Finance Area (CFO). He was also a member of the Supervisory Boards of Raiffeisen Towarzystwo Funduszy

Investycyjnych S.A. and Raiffeisen Leasing Polska S.A.. He continued his career at BNP Paribas Group S.A. as CFO advisor at BNP Paribas Bank Polska S.A. (in 2018-2019), and since 2019 as a member of the Management Board of Ukrsibbank supervising the Finance Area (CFO). Since 1 September 2023, he has been Vice President of the Management Board of BNP Paribas Bank Polska S.A. supervising the Finance Area.

6. Magdalena Nowicka – Vice-President of the Management Board

Graduate of the Faculty of Mathematics at the Maria Curie-Skłodowska University in Lublin and MBA studies at the Warsaw University of Technology. She also completed postgraduate studies in management and "Information Technology in Business" at the Warsaw School of Economics. For 20 years, she was associated with the ING Group. She started her career at ING Barings in 1997 and then worked in the IT Division of ING Bank Śląski. She was director of the IT Support Department. From 2006 to 2016, she was president of the board of ING Services Poland. At that time, she built ING Tech Poland, ING Group's technology centre, providing IT services, including cybersecurity and cloud solutions, to Customers in more than 20 countries. In 2017, she joined Nordea, where she worked as Head of IT Poland. Among other things, she took part in the creation of the Nordea Horizon Center - a state-of-the-art IT monitoring and operations centre. Subsequently, as Global Head of Technology Sourcing, she was responsible for implementing the strategy for the use of global IT service centres. Since January 2021, she has been Vice President of the Management Board of BNP Paribas Bank Polska S.A. and oversees the New Technologies and Cybersecurity Area. Magdalena Nowicka is actively involved in projects supporting the development of women in the world of new technologies. She is a mentor of the "Technologia w spółnicy" programme.

7. Volodymyr Radin – Vice-President of the Management Board

Graduate of the Ukrainian Academy of Banking of the National Bank of Ukraine. In addition, he completed his marketing studies at HEC in Paris and his studies in management leadership at the Ukrainian Academy of Corporate Governance. He has been involved in banking for over 18 years. From 2002 to 2003, he worked at Bank Aval (Raiffeisen Bank Aval) as Director of the Consumer Finance Department. From 2003 to 2007, he was Director of the Retail Banking Business Line at Universal Development and Partnership Bank (Foxtrot Group) and then

Deputy Director of the Retail Banking Business Line and Director of Product Management at Kreditprombank from 2007 to 2008. In 2008, he joined the BNP Paribas Group as Sales and Marketing Director and Deputy Director of the Personal Finance Business Line at Ukrsibbank (BNP Paribas Group). In 2014, he became Director of the Personal Finance business line and a member of Ukrsibbank's Board of Directors, and later Vice-Chairperson of the Board of Directors. During his more than 18 years of professional work in financial institutions, he was involved in numerous projects on the creation, transformation or comprehensive modernisation of retail banking operations: consumer loans, credit cards, vehicle financing, mortgages, payments, savings products, debt collection, call centre. A degree in finance underpinned the high-level skills acquired in many areas of banking, such as sales and marketing, financial planning and budgeting, operational and credit risk management, market analysis, and Customer satisfaction management. As of October 2019, he is Vice President of the Management Board of BNP Paribas Bank Polska S.A. overseeing the Personal Finance Banking Area. From 1 January 2024, he also supervises the Retail and Business Banking Area.

8. Agnieszka Wolska – Vice-President of the Management Board

Graduated in finance and banking from the Warsaw School of Economics. She has over 20 years of experience in international listed banks. She started her career in 2003 at Bank BPH in the Structured Finance Department. In 2006, she became deputy director of the Structured Finance Department. In 2007, she joined Bank Pekao, where she became deputy director of the Complex Enterprise Solutions Office, and in 2010, head of the TMT Office. In 2014, she became Director of the Large Enterprises Department at Santander Bank Polska, then in 2016 she became Director of the Corporate Banking Area, thus joining the ranks of more than a dozen top managers at Santander Bank Polska who make up the operations management team in Poland. In 2018, she became Director of the Business Banking and Corporate Banking Area at Santander Bank Polska. During her career, she has attended numerous courses in finance, management and leadership. Since September 2021, she has been Vice President of the Management Board of BNP Paribas Bank Polska S.A. and oversees the SME and Corporate Banking Area.



Remuneration of the Management Board and Supervisory Board

Pursuant to the Remuneration Policy for the members of the Bank's Supervisory Board, the members of the Supervisory Board receive only fixed remuneration and its level is set by the Bank's General Meeting. The General Meeting of Shareholders adopts the Remuneration Policy in place at the Bank and is responsible for setting the remuneration for the members of the Supervisory Board (the level of remuneration is approved by a resolution of the General Meeting). At the meeting adopting the Remuneration Policy, shareholders may submit their comments and opinions for inclusion in the final document. The Bank does not engage external remuneration consultants.

Pursuant to the Remuneration Policy for Persons with Significant Influence on the Risk Profile of BNP Paribas Bank Polska S.A.:

- the remuneration paid to persons with a material impact on the Bank's risk profile is adequate, i.e. reflects their contribution to the achievement of the Bank's objectives, their workload and the best market practice of rewarding persons in similar positions, as adopted on the Polish market, and takes into account the appropriate ratio of fixed remuneration to variable remuneration;
- it is possible to award variable remuneration, which occurs on a one-off basis when recruiting individuals to positions identified as having a material impact on the Bank's risk profile (in the first year of employment), where the Bank has a sound and solid capital base, and which is limited to the first year of employment (the so-called sign on bonus);
- severance payments and benefits of a similar nature, insofar as they are paid in an amount resulting from applicable laws or from a final court judgment or a settlement concluded before a court of law, are not subject to the principles of deferral and distribution to remuneration expressed in the form of shares in the Bank.

Given the Bank's commitment to the environment to date, as well as the Bank's efforts to implement the principles of social responsibility, the Bank ensures that the Remuneration Policy is consistent with the strategy for integrating sustainability risks into the Bank's activities. The Remuneration Policy does not encourage individuals with a material impact on the Bank's risk profile to take excessive risks with regard to sustainability risks and is linked to risk-adjusted performance.

Under the current Labour Code, a clawback mechanism does not apply at the Bank.

The Annual General Meeting of Shareholders adopts both the Remuneration Policy for the members of the Supervisory Board of BNP Paribas Bank Polska S.A. and the Remuneration Policy for persons with significant influence on the risk profile of BNP Paribas Bank Polska S.A. (including members of the Bank's Management Board).

The Bank has a Remuneration Committee whose remit includes.:

- monitoring the level and structure of remuneration for those employed as members of the Bank's Management Board,
- determining the content of contracts for the performance of the functions of a member of the Bank's Management Board,
- to submit annual information to the Supervisory Board on the Bank's employment and remuneration structure,
- exploring the possibility of selecting external remuneration consultants whose duties may include providing advice and support to the Supervisory Board.

The named figures for the remuneration paid to individual members of the Management Board during the year are as follows:

Table 170. Remuneration paid to members of the Management Board in 2024¹

Name	Date of office		Basic salary	Variable remuneration paid in the year	Issued shares ²	Additional benefits	Total
	from	to					
Przemysław Gdański	01.01.2024	31.12.2024	2 959	987	688	173	4 807
André Boulanger	01.01.2024	31.12.2024	1 277	522	425	170	2 394
Małgorzata Dąbrowska	01.01.2024	31.12.2024	840	263	-	115	1 218
Wojciech Kembłowski	01.01.2024	31.12.2024	1 426	397	295	131	2 249
Piotr Konieczny	01.01.2024	31.12.2024	1 190	86	-	90	1 366
Magdalena Nowicka	01.01.2024	31.12.2024	1 306	210	168	33	1 717
Volodymyr Radin	01.01.2024	31.12.2024	1 440	200	103	37	1 780
Agnieszka Wolska	01.01.2024	31.12.2024	1 328	217	176	126	1 847
Total			11 766	2 882	1 855	875	17 378

¹ remuneration and benefits paid to members of the Management Board for the period of their service on the Management Board
² value of shares determined based on the fair value in accordance with IFRS 2

**Table 171. Remuneration paid to members of the Management Board in 2023¹**

Name	Date of office		Basic salary	Variable remuneration paid in the year	Phantom share repurchase	Issued shares ²	Additional benefits	Total
	from	to						
Przemysław Gdański	01.01.2023	31.12.2023	2 706	1 225	82	587	171	4 771
Jean-Charles Aranda	01.01.2023	31.07.2023	710	385	24	200	424	1 743
André Boulanger	01.01.2023	31.12.2023	1 230	515	7	505	171	2 428
Przemysław Furlepa	01.01.2023	31.12.2023	1 337	443	33	276	256	2 345
Wojciech Kembłowski	01.01.2023	31.12.2023	1 332	312	37	270	125	2 076
Piotr Konieczny	01.09.2023	31.12.2023	380	-	-	-	230	610
Kazimierz Łabno	01.01.2023	31.12.2023	1 024	303	-	154	141	1 622
Magdalena Nowicka	01.01.2023	31.12.2023	1 203	163	-	154	95	1 615
Volodymyr Radin	01.01.2023	31.12.2023	858	230	-	87	856	2 031
Agnieszka Wolska	01.01.2023	31.12.2023	1 220	171	-	46	130	1 567
Total			12 000	3 747	183	2 279	2 599	20 808

¹ remuneration and benefits paid to members of the Management Board for the period of their service on the Management Board
² value of shares determined based on the fair value in accordance with IFRS 2

The members of the Management Board entered into employment contracts with BNP Paribas Bank Polska S.A. for an indefinite period of time. The terms and conditions of the agreements were prepared in accordance with the currently applicable laws and internal regulations. Furthermore, the members of the Management Board signed non-competition agreements during their employment relationship with BNP Paribas Bank Polska SA. In addition, 2 members of the Management Board are prohibited from competing for 9 months after the termination of their employment relationship. The members of the Bank's Management Board do not receive any remuneration on account of their functions in the authorities of subsidiaries of the BNP Paribas Bank Polska Group.

In accordance with their individual employment contracts, members of the Management Board are entitled to life insurance and a medical care package, as well as compensation bonuses. In addition, fringe benefits to which members of the Management Board are entitled (based on individual employment contracts) include:

- housing allowance specified in the employment contract,
- coverage or reimbursement of costs incurred in connection with the posting in Poland,

- covering the costs of private travel to the posting country for the Management Board member and family members living in Poland (at a specified frequency),
- covering the costs of children's schooling in Poland,
- a one-off allowance related to a change of workplace.
- BNP Paribas Bank Polska S.A. does not have any pension or benefit obligations of a similar nature towards its former management and supervisory personnel.

The named figures for the remuneration paid to individual members of the Supervisory Board during the year are presented in the tables below:

Table 172. Remuneration paid to members of the Supervisory Board in 2024

Name	Date of office		Remuneration for work in the Supervisory Board ¹	Deferred variable remuneration due to previous membership in the Management Board	
	from	to		Cash part	Issued shares ²
Lucyna Stańczak-Wuczyńska	01.01.2024	31.12.2024	548	-	-
François Benaroya	01.01.2024	31.12.2024	-	-	-
Jean-Charles Aranda	01.01.2024	31.12.2024	-	223	234
Jarosław Bauc	01.01.2024	02.07.2024	135	-	-
Małgorzata Chruściak	01.01.2024	31.12.2024	233	-	-
Magdalena Dziewguć	01.01.2024	21.11.2024	223	-	-
Sophie Heller	01.01.2024	31.12.2024	-	-	-
Monika Kaczorek	03.07.2024	31.12.2024	97	-	-
Vincent Metz	01.01.2024	31.12.2024	-	-	-
Piotr Mietkowski	01.01.2024	31.12.2024	-	-	-
Khatleen Pauwels	01.01.2024	31.12.2024	-	-	-
Jacques Rinino	01.01.2024	31.12.2024	214	-	-
Mariusz Warych	01.01.2024	31.12.2024	382	-	-
Total			1 832	223	234

¹ applies only to remuneration for work in the Supervisory Board
² value of shares determined based on the fair value in accordance with IFRS 2

**Table 173. Remuneration paid to members of the Supervisory Board in 2023**

Name	Date of office		Remuneration for work in the Supervisory Board ¹	Deferred variable remuneration due to previous membership in the Management Board	
	from	to		Cash part	Issued shares
Lucyna Stańczak-Wuczyńska	01.01.2023	31.12.2023	514	-	-
François Benaroya	01.01.2023	31.12.2023	-	-	-
Jean-Charles Aranda	01.08.2023	31.12.2023	-	-	-
Jarostaw Bauc	01.01.2023	31.12.2023	221	-	-
Małgorzata Chruściak	01.01.2023	31.12.2023	221	-	-
Geraldine Conti	01.01.2023	31.12.2023	-	-	-
Magdalena Dziewguć	01.01.2023	31.12.2023	173	-	-
Sophie Heller	30.06.2023	31.12.2023	-	-	-
Vincent Metz	01.01.2023	31.12.2023	-	-	-
Piotr Mietkowski	01.01.2023	31.12.2023	-	-	-
Khatleen Pauwels	01.01.2023	31.12.2023	-	-	-
Gregory Raison	17.01.2023	24.03.2023	-	-	-
Jean Paul Sabet	01.01.2023	30.06.2023	147	-	-
Mariusz Warych	01.01.2023	31.12.2023	351	-	-
Razem			1 627	-	-

¹ applies only to remuneration for work on the Supervisory Board

Information on the remuneration of the members of the Bank's Management Board and Supervisory Board can also be found in Note 51 Related Party Transactions in the Separate Financial Statements of BNP Paribas Bank Polska S.A. for the year ended 31 December 2024.

On 24 August 2018, the Extraordinary General Meeting adopted a resolution under which a member of the Supervisory Board who is concurrently employed in any entity within the BNP Paribas SA Group or in any subsidiary of any entity within the BNP Paribas SA Group is not entitled to remuneration on account of being a member of the Supervisory Board of BNP Paribas Bank Polska SA.

Diversity policy

Diversity policy for supervisory, management and administrative bodies

The Bank has a diversity policy with respect to the members of the Supervisory Board, which formally forms part of the Policy for assessing the suitability of the members of the Supervisory Board of BNP Paribas Bank Polska S.A., and a diversity policy with respect to the members of the Management Board, which formally forms part of the Policy for assessing the suitability of the members of the Management Board and persons performing key functions at BNP Paribas Bank Polska S.A..

The diversity policies for members of the Management Board, Supervisory Board are designed to reach a wide range of jurisdiction and competences when appointing members of the Supervisory Board and the Management Board in order to attract different viewpoints and experiences and to enable independent opinions and sound decisions to be made within the body, thereby ensuring that the management and supervisory bodies carry out their tasks to a high standard.

Members of the Management Board are appointed by the Supervisory Board in an open vote, taking into account the provisions of the Bank's Statutes and taking into account the results of the suitability assessment carried out in accordance with the Suitability Assessment Policy. The individual suitability assessment is carried out taking into account the following criteria:

- your knowledge, skills and professional experience in the field:
- significant areas of the Bank's business and the main risks associated with that business, including ESG and ML/FT risks that may arise from the Bank's activities or those of its Customers and counterparties,
- significant areas of sector/financial expertise, including financial and capital markets, solvency and models,
- management and strategic planning skills and experience,
- information technology and cybersecurity,
- local and regional markets,
- financial accounting and reporting,
- legal and regulatory environment,
- management of national groups and the risks associated with the structures of such groups;
- risk management, including ESG and ML/FT risks, as well as management of risks of non-compliance with generally applicable or internal laws and internal audit recommendations;
- with regard to the warranty of the proper performance of the function entrusted, taking into account, i.a.:
- the reputation you have,



- financial situation,
- criminal record,
- capacity for independent judgement, taking into account personal competence (behavioural requirements);
- the existence of a possible conflict of interest;
- in terms of devoting sufficient time to the performance of the function entrusted, taking into account:
- the number of other activities or functions performed simultaneously,
- the actual participation of that person in the work of the Management Board.
- The Bank aims to ensure sufficient diversity in the composition of the Management Board in terms of the following criteria:
- gender,
- age,
- geographical origin,
- educational direction, work experience and seniority,
- skills or expertise.

In terms of merit criteria, the Diversity Strategy ensures the selection of individuals with a diversity of knowledge, skills and experience, appropriate to their roles and responsibilities, which complement each other across the Supervisory Board and the Management Board. These criteria are reviewed through the suitability assessment process described in the aforementioned Suitability Assessment Policies. Furthermore, diversity encompasses and exploits to best effect the differences that, in addition to knowledge, competence and professional experience, arise from gender, age and geographical origin.

The Bank attaches a very high priority to the real implementation of diversity, including ensuring adequate representation of women in the Bank's bodies. The Bank has taken a strategic decision to ensure that by 2025 it will have 30% women on the Management Board and to maintain the proportion of the underrepresented gender on the Supervisory Board at a minimum of 30% of the composition.

As at 31 December 2024, the proportion of women on the Supervisory Board was 45.5%, while the proportion of women on the Bank's Management Board was 37.5%.

The table below shows the current diversity in terms of gender, age and length of service at the Bank of members of the Supervisory Board, the Bank's Management Board and key managerial positions.

Table 174. Gender, age and tenure diversity at the Bank as at 31.12.2024*

Gender	Women	Men	Total
Supervisory Board	5	6	11
Management Board	3	5	8
Top management (B1+B2)	177	210	387
Total	185	221	406

Age	<30 years	30-50 years	>50 years	Total
Supervisory Board	0	2	9	11
Management Board	0	2	6	8
Top management (B1+B2)	1	285	101	387
Total	1	289	116	406

Seniority at the Bank (years)	<5	5-10	10-15	15-20	20-25	>25	Total
Supervisory Board	8	2	1	0	0	0	11
Management Board	2	4	1	0	1	0	8
Top management (B1+B2)	79	67	67	88	47	39	387
Total	89	73	69	88	48	39	406

* figures present Bank's active employees as at 31.12.2024

Internal control system (including control and risk management system for the preparation of financial reports)

The internal control system at BNP Paribas Bank Polska operates in line with the requirements of the Polish supervisory authorities and is aligned with the internal control rules in place at the BNP Paribas Group. The Bank has and develops an internal control system adapted to its organisational structure, which includes the Bank's organisational units and core business units and the Bank's subsidiaries.

The purpose of conducting internal control is to effectively control risks, including the prevention or early detection of risks. The role of the internal control system is to achieve the general and specific objectives of the internal control system, which should be taken into account at the stage of designing control mechanisms. The principles of the internal control system are set out in the document "Internal Control Policy at BNP Paribas Bank Polska S.A.", approved by the Bank's Management Board. The document sets out the main principles, organisational framework and standards for the operation of the control environment at the Bank, maintaining compliance with the requirements of the FSA set out in Recommendation H and the Regulation of the Minister of Finance, Funds and Regional Policy of 8 June 2021 on the risk



management system and internal control system and remuneration policy in banks. Detailed internal regulations relating to specific areas of the Bank's operations are adapted to the specific nature of the Bank's business. The development of detailed regulations relating to the area of internal control is the responsibility of the relevant organisational units of the Bank, in accordance with the scope of tasks assigned to them.

The Bank's internal control system is based on the 3 lines of defence model, consisting of:

- first line of defence (1LoD):
 - is constituted by the owners of the risk, by managing that risk and ensuring that the controls in the area of delegated responsibility operate effectively and in accordance with the law;
 - is responsible for compliance with the rules arising from approved policies, regulations, instructions and procedures;
 - is responsible for the design, implementation and application of controls designed to ensure that the general and specific objectives of the internal control system are achieved and for independent monitoring of compliance with the controls in the form of ongoing verification and/or horizontal testing.
- second line of defence (2LoD):
 - is responsible for managing individual risks independently of frontline risk management, taking into account the requirements set by the supervisory authorities, business needs, including the risk appetite adopted by the Bank;
 - is responsible for monitoring compliance with second-line of defence controls in the processes it manages in the form of ongoing verification and/or horizontal testing;
 - performs the tasks arising from the second line of defence control function in accordance with the internally adopted regulations of the individual 2LOD units and is responsible for monitoring compliance with first line of defence controls, in the form of day-to-day verification and/or vertical testing.
- third line of defence (3LoD) - - the third line of defence is the independent and objective Internal Audit Division, which verifies the correct functioning of the first and second lines of defence in accordance with dedicated internal files.

The Bank has a process architecture within which relevant processes are selected, according to specific criteria. The control function for material processes is documented by the Bank using the Control Function Matrix (SCF), which is a description of the link between the general and specific objectives of the internal control system and the material processes, together with the key controls embedded in these processes and the independent monitoring of these controls. The Bank supports the SCF with a dedicated application.

The role of the control function is to ensure compliance with the control mechanisms in the processes in place at the Bank, including those relating to risk management, covering all the Bank's units and organisational units.

The Bank adapts the types of control mechanisms (procedures, segregation of duties, authorisation, access control, physical control, recording of financial and economic operations in banking systems, inventory, documentation of deviations, training, self-control) to the specific objectives of the internal control system, the complexity of the processes, the risk of irregularities, taking into account the Bank's available resources.

Irregularities detected during the exercise of internal control within each line of defence, including errors and fraud, are categorised according to their source and their impact on ensuring the achievement of the stated objectives of the internal control system.

As a result of the activities carried out at the Bank and the reviews and assessments of the effectiveness in the area of internal control, the Bank's Management Board and/or Supervisory Board receive appropriate reports.

The Accounting Policy has been adopted at the Bank, in compliance with the principles of the International Financial Reporting Standards approved by the European Union and other detailed internal acts concerning the recording of events and the processes of preparing accounting and reporting data. The preparation of financial statements, periodic financial reporting and the provision of management information are the responsibility of the Financial Accounting Division and the Management Accounting and Investor Relations Division, supervised by the Vice-President of the Management Board responsible for the Finance Area. The financial statements are adopted by resolution and approved for publication by the Bank's Management Board.

The Bank's financial reporting process is based on accounting data, the preparation of which in source systems and reporting databases is subject to formal operational and acceptance procedures. Reporting data is subject to control mechanisms, such as reconciliation of reporting data with the accounting ledgers, analytical data and relevant documentation. The process of month-end closing and preparation of accounting and reporting data is carried out and monitored on the basis of a schedule that defines the various stages of the process with their owners, who are responsible for the correct and timely execution of the various activities.

As part of its risk management in the process of preparing financial statements, the Bank keeps abreast of changes in laws and regulations relating to bank financial reporting and updates the accounting principles used and the scope and form of disclosures in the financial statements accordingly, as well as making the required changes to the IT systems.

The Bank's consolidated financial statements are prepared on the basis of the Bank's separate data and information received from the subsidiaries in the form of consolidation packages. The Financial Accounting Division verifies the information received and maintains ongoing communication with the financial services of the subsidiaries to ensure the best possible quality and consistency of the data received.

A key role in the process of evaluating the Bank's financial statements is played by the Audit Committee, which monitors the financial reporting process and the independence of the auditor and auditing entity, and recommends to the Supervisory Board the approval or rejection of the annual financial statements. The annual financial statements, following a positive recommendation by the Audit Committee and the Supervisory Board, are presented to the General Meeting for approval.



Information about the auditor

The Supervisory Board of BNP Paribas Bank Polska S.A. selects the entity authorised to audit the financial statements of BNP Paribas Bank Polska S.A. and the BNP Paribas Bank Polska Group, pursuant to the provisions of the Bank's Statute and based on a recommendation of the Audit Committee.

Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. was appointed on 15 September 2023 by the Bank's Supervisory Board as the audit firm authorised to audit and review the separate financial statements of BNP Paribas Bank Polska S.A. and the consolidated financial statements of the BNP Paribas Bank Polska S.A. Group, including the reporting packages, for the years 2024-2025.

Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. with its registered office in Warsaw at Rondo ONZ 1, is entered in the list of audit firms under number 130, which is maintained by the Polish Audit Supervision Agency.

The audit firm Mazars Audyt sp. z o.o. was the entity authorised to audit and review the financial statements of the Bank and the BNP Paribas Bank Polska S.A. Group for 2023.

Table 175. Auditor's fees by type of service

PLN thousand (including VAT)	12 months until 31.12.2024			12 months until 31.12.2023**		
	Bank	Bank's subsidiaries	Total	Bank	Bank's subsidiaries	Total
Statutory audit	2,635	305	2,940	1,220	161	1,381
Other assurance services*	1,556	843	2,399	1,293	621	1,914
Other	57	0	57	0	0	0
Razem	4,248	1,148	5,396	2,513	782	3,295

* This category includes the fees of the auditor who performed the review of the interim financial statements, the verification of the reporting packages for the consolidation of the BNP Paribas Group. The review and audit of funds managed by the TFI subsidiary is also included in this category.

** In 2023, the remuneration of Mazars Audyt Ltd.



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Compliance with laws and regulations

Court cases and administrative proceedings

Legal risk

As of 31 December 2024, there were no proceedings in the court, arbitration tribunal or state administration authorities regarding liabilities or receivables of the Bank, the value of which would exceed 10% of the Bank's equity.

Court decision regarding calculation of the interchange fee

On 6 October 2015, the Court of Appeals issued a decision regarding calculation of the interchange fee by Banks acting in agreement. Thus, the decision of the first instance (Regional) Court of 2013 was changed by dismissing the Banks' appeals in whole, while upholding the appeal brought by the Office of Competition and Consumer Protection (UOKiK), which had questioned a considerable reduction in the fines by the first instance court. This denotes that the penalty imposed under the first decision of the President of UOKiK of 29 December 2006 was upheld. It involved a fine levied on 20 Banks, including Bank BGŻ S.A. and Fortis Bank Polska S.A., for practices limiting competition by calculating interchange fees on Visa and MasterCard transactions in Poland in agreement.

The total fine levied on Bank BGŻ BNP Paribas S.A. (presently BNP Paribas Bank Polska S.A.) amounted to PLN 12,554 thousand and included:

- a fine for the practice of Bank Gospodarki Żywnościowej in the amount of PLN 9,650 thousand; and
- a fine for the practice of Fortis Bank Polska S.A. (FBP) in the amount of PLN 2,895 thousand.

The penalty was paid by the Bank on 19 October 2015. The Bank prepared a last resort appeal against the aforesaid court decision and brought it on 25 April 2016. On 25 October 2017, the Supreme Court overruled the judgment of the Court of Appeal and remitted the case. Acquisition of the core business of RBPL did not change the situation of the Bank as RBPL was not a party to this claim.

November 23, 2020. The Court of Appeal reversed the judgment of the Court of First Instance and remanded the case for a new trial, and the first hearing was held in November 2022. The case is ongoing.

Business claims against the Bank (interchange fee)

By 31 December 2024, the Bank has received a total of:

- 33 requests for settlement from companies (merchants), due to interchange fees paid in relation to the use of payment cards, (two from companies which submitted their requests twice and, one from the company which submitted its request three times and one from a company which submitted two requests for different payment methods). The total amount of these claims was PLN 1,028,020 thousand, including PLN 1,018,050 thousand where the Bank had joint responsibility with other Banks;
- 4 requests for mediation before the Polish Financial Supervision Authority. The requests were sent to the Bank by the same entrepreneurs who had previously submitted requests for a settlement attempt. The total value of claims arising from the above applications amounts to PLN 40,290 thousand of which PLN 37,790 thousand relates to joint liability with other banks.

Most of the settlement attempts after the Bank's refusal to enter into discussions did not reach court.

Litigation and claims of investment fund participants in connection with the performance of the function of investment fund depositary.

As of 31 December 2024, the Bank had received a total of 164 individual lawsuits and 6 collective lawsuits by investment fund participants, related to the performance of the function of investment fund depositary (including the performance of this function by Raiffeisen Bank Polska S.A.).

The total amount of claims under the above-mentioned lawsuits is PLN 205,165 thousand.

The first two class actions were filed by participants of the Retail Parks Fund Closed Investment Fund of Non-Public Assets in Liquidation (hereinafter RPF Fund), respectively: on behalf of 397 participants, the value of claims PLN 96.2 million, and on behalf of 181 participants, the value of claims: PLN 25,302 thousand.

Other lawsuits in the class actions concern the determination of the Bank's liability for the Bank's actions as depositary of the following funds: 3) PSF 2 Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (on behalf of 17 fund participants; no indication of the amount of claims), 4) PSF Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (on behalf of 81 fund participants; no indication of the amount of claims), 5) EPEF Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (lawsuit filed on behalf of 42 fund participants; value of claims - PLN 128 thousand) and 6) PSF Lease Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (on behalf of 38 fund participants; value of claims: PLN 9,0 million).

The allegations raised in the lawsuits focus in particular on the improper performance by Raiffeisen Bank Polska S.A., and subsequently the Bank, of its obligations to ensure that the net asset value of an investment fund and the net asset value per investment certificate are calculated in accordance with the law and the investment fund's statutes, and the obligation



to verify the compliance of an investment fund's operations with the law governing investment funds or with the statutes. The Bank's position is that the claims of fund participants against the Bank are unfounded.

By 31 December 2024, there were a total of 10 non-final judgments by first-instance courts:

- 1 judgment unfavourable to the Bank (the Court in the case concerning the InMedica fund awarded the amount of: PLN 64 thousand in favour of the plaintiff due to improper diversification of the fund's assets)
- 9 judgments in favour of the Bank (actions by individual fund participants dismissed due to lack of prerequisites for the Bank's liability for damages, in one case a request was made to justify the judgment).

Administrative proceedings of the Polish Financial Supervision Authority for the imposition of a penalty in connection with the performance of the function of depositary of investment funds

On 28 September 2022, the Polish Financial Supervision Authority initiated administrative proceedings for the imposition of an administrative penalty on the Bank pursuant to Article 232(1a) of the Act on Investment Funds and Management of Alternative Investment Funds, in connection with a suspected violation by the Bank, in the period 31 January 2017 to 31 August 2019, of the provisions of the aforementioned Act, by failing to properly control the factual and legal actions carried out by the investment funds: PSF Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych and PSF 2 Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych to ensure that the net asset value of these funds and the net asset value per investment certificate were calculated in accordance with the provisions of the law and the statutes of these funds.

In its decision of 14 June 2024, the Polish Financial Supervision Authority imposed a fine of PLN 1,000 thousand on the Bank for breaching its obligations related to ensuring that the net asset value of the funds and the net asset value per investment certificate were calculated in accordance with the law, for valuation days falling between 31 October 2018 and 31 July 2019. In its reasoning for the decision, the Polish Financial Supervision Authority indicated that the breach of the aforementioned duties of the Depositary consisted mainly in: i.) failing to obtain full information on the financial situation of the issuers of the bonds that the funds purchased, which resulted in the Depositary not being able to fully assess the bond issuers' ability to redeem the bonds, ii.) failing to analyse the impact of the circumstances concerning the financial situation of the bond issuers on the reasonableness of impairment losses on the bonds and the final valuation of the fair value of the bonds, iii.) failing to investigate the reasons for the occurrence of negative capitals on the part of the bond issuers and the possible impact of these circumstances on the bond issuers' ability to repay their bond redemption obligations. The Polish Financial Supervision Authority discontinued the proceedings in part to ensure that the net asset value of these funds and the net asset value per investment certificate are calculated in accordance with the statutes of these funds for the asset valuation days falling between 31 October 2018 and 31 July 2019, and in part to ensure that the net asset value of these funds and the net asset value per investment certificate are calculated in accordance with the law and the statutes of these funds for the asset valuation days falling between 31 January 2017 and 30 October 2018. (acting as depositary by Raiffeisen Bank Polska S.A.) and from 1 August 2019 to 31 August 2019.

On 4 July 2024, the Bank has applied for reconsideration by the the Polish Financial Supervision Authority.

The Polish Financial Supervision Authority has informed the Bank that the proceedings to determine the aforementioned application are scheduled to be completed in April 2025.

On 7 December 2022, the Polish Financial Supervision Authority initiated administrative proceedings for the imposition of a penalty pursuant to Article 232(1a) of the Act on Investment Funds and Management of Alternative Investment Funds, in connection with the Bank's suspected breach of the provisions of the aforementioned Act in 2017-2019, by failing to exercise continuous control over the factual and legal actions carried out by Retail Parks Fund Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych, in connection with the valuation of the fund's assets, aimed at ensuring that the net asset value of the fund and the net asset value per investment certificate are calculated in accordance with the provisions of the law.

By decision of 14 June 2024, the Polish Financial Supervision Authority imposed a fine of PLN 500 thousand on the Bank for breach of duties related to ensuring that the fund's net asset value and the net asset value per investment certificate were calculated in accordance with the law, for the valuation days falling on 30 November 2018 and 28 February 2019 and 28 February 2019. In the justification for the decision, the PSFA indicated that the breach of the above-mentioned duties of the Depositary consisted primarily in failing to thoroughly analyse the circumstances affecting the determination of the situation of the issuers of the bonds purchased by the fund and in failing to obtain sufficient information on the circumstances affecting that situation. As a result, the Depositary failed to see the justification for making write-downs of the bonds in an appropriate amount and the valuation of the bonds was inadequate. The PSFA dismissed the proceedings in part relating to the suspected breach between 1 January 2017 and 30 October 2018.

On 4 July 2024 the Bank has applied for reconsideration of the case by the Polish Financial Supervision Authority.

The Polish Financial Supervision Authority has informed the Bank that the review proceedings of the above-mentioned application are scheduled to be completed in March 2025.

Proceedings on practices violating collective consumer interests – unauthorised transactions

On 8 July 2022. The UOKiK has initiated proceedings for practices that violate the collective interests of consumers. The UOKiK alleges that the Bank, upon receipt of a consumer complaint regarding an unauthorised transaction, does not automatically return funds to Customers within the D+1 deadline, but instead conducts an initial clarification procedure to determine whether the transaction in question should be considered as accepted/accepted by the Customer. The second allegation of the UOKiK concerns the Bank's provision of incorrect information to Customers when rejecting complaints about the disputed transaction. When rejecting such complaints, the Bank explained that, according to its systems, the transaction is considered authorised because it was confirmed in accordance with the provisions of the contract applicable to the Customer, including through elements that only he/she should have been aware of, thus its questioning indicates a case of gross negligence on the part of the Customer.

Similar allegations have been made by the UOKiK against more than a dozen other banking sector entities.

In August and December 2024, the UOKiK requested additional information and extended the proceedings until 11 April 2025.



Proceedings for practices violating the collective interests of consumers - suspension of performance of mortgage contracts (moratorium)

On 5 September 2022, the Bank received the UOKiK's decision to initiate proceedings against practices that violate the collective interests of consumers by limiting the possibility to apply for a mortgage loan withholding by limiting one application to 2 months, whereas the Customer should be able to apply for all periods at the same time (up to 8 months).

In addition, the Bank disagreed with the allegations and has sent its reply to UOKiK, in which it pointed that BNP accepted and processed all individual applications applied by Customers (for any number of months). Thus, there was no violation of the collective interests of consumers, as the Bank did not deprive Customers of their rights, but only failed to fully automate the electronic application as of the effective date of the law. At the same time, the Bank informed UOKiK that it had changed the questioned practice by launching a new application form in GOonline e-Banking on 8 September 2022, allowing Customers to apply for any/all periods simultaneously (up to 8 months).

On 17 January 2023, the Bank received the Decision of the UOKiK, in which:

- it recognized the questioned practice as violating the collective interests of consumers;
- the practice was found to be abandoned;
- it ordered publication of the decision;
- it imposed a penalty on the Bank in the amount of PLN 2,721 thousand (reduced by 50%: 30% - for cessation of the practice, 20% - as a result of initiating a meeting and expressing willingness to cooperate).

On 17 February 2023, the Bank has appealed the decision to the Competition and Consumer Protection Court. On 8 December 2023, the court delivered to the Bank the OCC's response to the Bank's appeal, filed with the OCC on 28 August 2023.

The Bank has created a provision in the amount of the penalty imposed.

The court closed the hearing and set the date for the verdict announcement – 24 March 2025

Court proceedings concerning the institution of the sanction of free credit referred to in Article 45 of the Act of 12 May 2011 on consumer credit ("u.k.k.")

The institution of the sanction of free credit is regulated in Article 45 of the a.k.k., according to which, in the event of a breach by the creditor of the provisions of the a.k.k. listed therein, the consumer, after submitting a written statement to the creditor, shall repay the credit without interest and other credit costs due to the creditor by the date and in the manner agreed in the credit agreement, and if such manner has not been agreed, shall repay the credit in equal instalments, payable monthly, from the date of conclusion of the credit agreement. Pursuant to Article 45(5) of the a.k.k., the entitlement to the sanction of free credit expires one year after the execution of the credit agreement.

The first lawsuits related to Customers' use of the free credit sanction institution started to be received by the Bank in 2021. At the end of 2024, the Bank had received 801 such lawsuits with a total litigation value of PLN 16.9 million.

The Bank disputes the validity of the claims raised in these cases. The case law to date is overwhelmingly in favour of the Bank.

The majority of court proceedings are pending before courts of first instance. There are 92% of favourable judgments in finalised cases, as at 31 December 2024.

Of the total cases pending against the Bank: 595 are at first instance, 73 are at the second instance stage and 133 have been finalised.

The allegation of the use of the free credit sanction is also made in the Bank's debt collection actions. As at 31 December 2024, the allegation in question has been made in 31 such cases.

Legal issues concerning the institution of the sanction of free credit are the subject of numerous preliminary questions referred by Polish courts to the Court of Justice (of the European Union), concerning:

- the admissibility of interest on non-interest credit costs and the disclosure obligations on financial institutions in this context (Cases C-472/23, C-566/24 and C-744/24),
- the interpretation of the one-year time limit for making a declaration to benefit from the sanction of free credit (Case C-566/24),
- the scope of the Consumer's information on the early repayment procedure (Cases C-566/24, C-831/24) and the Consumer's right of withdrawal (Case C-566/24),
- the examination by the court of its own motion of the creditor's infringement of provisions other than those indicated in the declaration to benefit from the sanction of free credit (Case C-831/24),
- the admissibility of an assignment of claims under a consumer credit agreement and the duty of the court to examine the assignment agreement of its own motion from the point of view of the abusive nature of the provisions contained therein (Case C-80/24),
- the permissible method of determining the remuneration to which a consumer is entitled under an assignment agreement (Case C-600/24),
- the application of the sanction of free credit in the light of the principle of proportionality (Cases C-472/23, C-566/24, C-831/24).

On 24 October 2024, the Court of Justice (EU) handed down its judgment in Case C-339/23 (Horizon). The CJEU ruled that the provisions of Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC allow Member States to introduce different sanctions for failure to carry out a consumer credit assessment and for breaching the information obligations set out in the Directive. The CJEU



did not analyse the Polish legislation or indicate a specific sanction for a breach of the obligation to carry out a consumer creditworthiness assessment, noting that the choice of sanctions is up to the member state, provided that they are effective, proportionate and dissuasive. In Article 45 u.k.k., the legislator did not provide for the possibility of applying the sanction of free credit for the bank's breach of the obligation to examine the consumer's creditworthiness.

The interpretation of the provisions on the institution of free credit sanctions is also the subject of legal issues referred to the Supreme Court for consideration, concerning: the power of the court to examine of its own motion infringements other than those indicated in the consumer's declaration on the use of free credit sanctions, the interpretation of the one-year time limit for the submission of a declaration on the use of free credit sanctions, the mutual relationship between the institution of free credit sanctions and the provisions on prohibited provisions, as well as the admissibility of interest on non-interest costs and the possibility of applying free credit sanctions on this account (ref. II Ca 825/24).

WIBOR Lawsuits concerning mortgage loan agreements with interest rates based on WIBOR

In the first quarter of 2022, the first media reports of lawsuits against banks challenging WIBOR in loan agreements (with allegations that clauses relating to WIBOR are abusive, or alternatively that the agreement is invalid) appeared in Poland. These lawsuits seek to challenge WIBOR as the basis for variable interest rates. In addition, the extent to which and the manner in which consumers were instructed and informed about the volatility of the index, as well as the methods of its calculation and the factors influencing its change are challenged.

In January 2023, the Bank received the first lawsuits challenging the WIBOR and variable interest rate clauses based on the WIBOR benchmark in the mortgage loan agreements.

By 31 December 2024, the Bank had received a total of 64 lawsuits (one lawsuit was withdrawn). The lawsuits were filed on behalf of consumers and relate to PLN mortgage loan agreements, only 1 lawsuit was filed by a trader and relates to a revolving credit agreement.

In the case of the Bank's products offered to consumers, only mortgage loans and certain products for Wealth Customers are based on the WIBOR reference index. Mortgage loans comprise 68,000 agreements with a carrying value of PLN 14,840.1 million. The total value of the subject of litigation in ongoing court proceedings is PLN 17.3 million, of which PLN 3.9 million is covered by a demand for payment. Most of the court proceedings are pending before courts of first instance. In three cases, judgments of the court of first instance, one of which is final, have been issued in favour of the Bank.

In addition, in 24 debt collection cases brought by the Bank, Customers have raised arguments challenging WIBOR as a reference index.

The vast majority of lawsuits are accompanied by applications to secure the claim by withholding the interest portion of the instalment based on the WIBOR interest rate for the duration of the lawsuit. Most of the applications are dismissed by the courts (57 out of 63 applications for security were dismissed). As of 31 December 2024, only two orders granting the request for security are binding, of which one order is final after the Bank's complaint was dismissed, for the other order the Bank has filed a complaint but it has not yet been heard.

The Bank's position is that the Customers' claims are unjustified, in particular in view of the fact that WIBOR is an official index whose administrator has received the relevant approvals required by law, among others from the Polish Financial Supervision Authority, and the process of its determination, carried out by the administrator (an independent entity not affiliated with the Bank), is in accordance with the law and is also subject to supervisory assessment by the Polish Financial Supervision Authority. The Polish Financial Supervision Authority confirmed WIBOR's compliance with the requirements of the law. An analogous position was also presented by the Financial Stability Committee, which comprises representatives of: the National Bank of Poland, the Polish Financial Supervision Authority, the Ministry of Finance and the Bank Guarantee Fund.

On 29 June 2023, the Polish Financial Supervision Authority, published an assessment of WIBOR's ability to measure the market and economic realities, concluding that WIBOR has the ability to measure the market and economic realities it was designed to measure and responds appropriately to changing liquidity conditions, changes in central Bank rates and economic realities.

On 26 July 2023, the Office of Polish Financial Supervision Authority (PFSA) published a position paper on legal and economic concerns relating to mortgage loan agreements in Polish currency in which the WIBOR interest rate benchmark is used. The position paper contains an explicit statement that WIBOR meets all the requirements prescribed by law and that, in the PFSA's view, there are no grounds to question the reliability and legality of WIBOR, in particular in the context of the use of this index in Polish currency mortgage contracts. PFSA indicated that its position could be used by Banks in court proceedings.

According to data from the Association of Polish Banks (as at the end of November 2024) there are currently 1 526 court proceedings underway in which Customers are challenging contractual provisions providing for interest rates based on the WIBOR reference rate. In 124 judgements, out of 130 passed, the courts of first instance ruled in favour of the banks. The 64 proceedings have been finally concluded, including one final judgment against the Bank (however, the invalidity of the agreement was due to reasons other than the WIBOR index).

By decision of 31 May 2024, in a case brought by borrowers against PKO BP SA, the Regional Court of Częstochowa addressed legal questions to the CJEU concerning the possibility of examining contractual provisions on variable interest rates based on the WIBOR index, the bank's information obligations regarding variable interest rate risk and the possibility of continuing a loan agreement based on a fixed margin if contractual provisions on variable interest rates based on the WIBOR are considered unfair. The case registered under case number C-471/24 has not yet been decided.

Administrative proceedings of the PFSA to impose a fine

On 22 November 2023, the Polish Financial Supervision Authority started administrative proceeding against BNP Paribas Bank Polska S.A. that might result in a penalty being imposed on the Bank under Article 176i(1)(4) of the Act on trading in financial instruments. At this stage of the proceedings, the amount of the potential penalty cannot be estimated reliably.



Litigation concerning CHF credit agreements in the banking sector

According to data from the Polish Bank Association, the number of pending lawsuits relating to CHF-indexed/denominated loan agreements at the end of December 2024 was over 169 thousand compared to over 153 thousand at the end of 2023.

The result is an increase in the provisions for these proceedings made by banks with CHF mortgage portfolios.

The amount of provisions made by the largest listed banks in 2023 was approximately PLN 18 236.6 million and in the three quarters of 2024 approximately PLN 10 669.6 million translating into total provisions for this purpose of PLN 39 865.2 million at the end of 2023 and approximately PLN 41 236.2 million at the end of the third quarter of 2024.

Proceedings initiated by the Bank's Customers who entered into foreign currency and CHF-denominated loan agreements

The gross carrying amount of residential mortgages granted to individuals in CHF as at 31 December 2024 was PLN 406,207 thousand, compared to PLN 815,687 thousand at the end of 2023.

As at 31 December 2024, the number of active foreign currency and CHF-denominated loans was 8.3 thousand.

As at 31 December 2024, the Bank was the defendant in 6,596 (2,716 new cases in 2024) pending court proceedings (including validly closed cases, Customers brought a total of 9,591 claims against the Bank), in which the Bank's Customers demanded the annulment of mortgage loan agreements regarding foreign currency loans or loans denominated in CHF, or declare the contract permanently ineffective and pay the amounts hitherto paid. The claims are based on the occurrence of abusive clauses which cause the contract cannot be remained in force (article 3851 of the Civil Code.). The Bank is not a party to any collective claim regarding these loans. The total value of claims pursued in the currently pending cases as of 31 December 2024 was PLN 495.835 thousand (as of 31 December 2023 was PLN 2,835.204 thousand), and in legally binding cases PLN 1,141.019 thousand (PLN 434.544 thousand as of 31 December 2023).

As of 31 December 2024, the following judgments have been issued in 995 proceedings that have been legally concluded: 806 judgments in favour of the Bank, including 539 proceedings in case of which a court settlement agreement was concluded, and in 2,189 cases the courts ruled against the Bank by declaring the loan agreement invalid or permanently ineffective.

The Bank continuously assesses the impact of legal risks related to pending court proceedings involving denominated or foreign currency loans, taking into account the current status of judgments in cases against the Bank and the line of jurisprudence.

The Polish courts, despite the different indications resulting from the rulings of the CJEU (EU) (C-19/20 and C-932/19), overwhelmingly rule that loan agreements are invalid or ineffective.

The total impact of legal risks related to lawsuits recognised in the Bank's statements as at 31 December 2024 was PLN 3,238.8 million (PLN 3,404.0 million as at 31 December 2023), with an impact of PLN 795.7 million on the Bank's profit or loss statement in the first half of 2024 (in 2023 it was PLN 1,978.1 million). More detailed information on the impact

of legal risk is included in Note 53 Litigation and administrative proceedings of the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024.

At the same time, the Bank has taken into account the right to recognise a deferred tax asset in connection with the entitlement to apply a tax preference to settlements falling within the scope, in force until the end of 2024, of the Ordinance of the Minister of Finance of 11 March 2022, as amended by the Ordinance of 20 December 2022, on the abandonment of the collection of income tax on certain income (revenue) related to a residential mortgage loan. As at 31 December 2023. The Bank held assets of PLN 25,422 thousand, of which PLN 25,422 thousand were realised in H1 2024 and an additional PLN 24,267 thousand on the basis of a subsidised provision. Based on a new estimate of the impact of the legal risk associated with foreign currency loans at the end of 2024, the Bank leaves PLN 38 165 thousand in assets with an expected realisation by the end of 2025.

In addition, the Bank - based on the NSA ruling on the tax treatment of returned interest related to cancelled foreign currency loan agreements and the exchange rate differences arising in relation to these loans, recognised in previous years, as well as the individual interpretation, according to which statutory interest for late payment adjudged by the court constitutes a tax-deductible cost for the Bank on the date of payment - analysed their impact on the estimation of deferred income tax and, as a result, decided to create in 2024, an additional deferred tax asset of PLN 135,535 thousand in respect of the percentage of the estimated impact of the legal risk associated with CHF-denominated loan agreements of PLN 713,343 thousand.

Also based on the aforementioned NSA ruling and interpretation, the Bank adjusted its CIT return for 2023 in May this year for an amount of PLN 19 023 thousand in connection with the settlement of the cancellation of CHF loans for that year.

In estimating the impact of legal risk, the Bank takes into account, among other things, the estimated number of future lawsuits, the number of lawsuits filed, the probability of losing the case, and the Bank's estimated loss in the event of an unfavourable judgment. In addition, the Bank has included in the model the estimated number of settlements that will be made with Customers. The amount of the estimated impact of the legal risk associated with the settlements was PLN 238.2 million of the total impact estimate.

The Bank estimates the probability of losing a case based on historical judgments, separately for the foreign currency and denominated loan portfolios. Due to the observed volatility in case law, the Bank, when estimating the probability of an adverse judgment, takes into account judgments made after 31 December 2020.

In estimating the loss in the event of a judgment declaring the loan invalid, the Bank assumes that the Customer is obliged to return the capital paid out without taking into account other benefits from the consumer (remuneration for the use of the capital or valorisation), that the Bank is obliged to return the sum of the capital and interest instalments repaid together with the statutory default interest awarded in the case of pending cases and that the Bank writes off the credit exposure. The loss estimate takes into account the time value of money. The accounting effect of signing a settlement agreement with a Customer is the derecognition of a CHF loan, recognition of a new loan in PLN, the recognition of a result from the derecognition as well as the use of a provision for legal risk of CHF loans and the Bank's records of settlements with Customers.



The accounting effect of a final judgment declaring a credit agreement invalid is to cease to recognise CHF credit exposure and to record settlements with Customers due to the declaration of invalidity of the agreement.

Should the assumed average loss change by +/- 5%, with all other significant assumptions unchanged, the impact estimate would change by +/-113.8 million.

The Bank conducted a sensitivity analysis of the model used to estimate the number of lawsuits lost. A change in this estimate would have the following impact on the estimated loss due to legal risk related to CHF loans.

parameter	scenario	impact on Bank's loss due to legal risk
Percentage of cases lost	+5 p.p.	+80,4 PLN million
	-5 p.p.	-115,1 PLN million

The Bank conducted a sensitivity analysis of the model used to estimate the number of future lawsuits. A change in the number of future lawsuits would have the following impact on the estimated loss due to legal risk related to CHF loans.

parameter	scenario	impact on Bank's loss due to legal risk
Number of future lawsuits	+20%	+68 PLN million
	-20%	-68 PLN million

Additionally, according to the Bank's assessment if 1% of Customers with CHF loans filed a lawsuit against the Bank, the loss due to legal risk would increase by approx. PLN 35.4 million.

When calculating the expected loss on legal risk related to CHF loans, the Bank takes into account the available historical data, including the content of judgments in concluded cases. The Bank monitors the number of certificates collected and the change in the number of lawsuits in order to update the estimate of the impact of legal risk of foreign currency loans accordingly.

The current line of jurisprudence in cases involving actions by CHF borrowers is unfavourable to Banks, but nevertheless some legal issues are still not clarified, in particular the qualification of loans as foreign currency loans. The above issue is relevant to the assessment of the risks associated with proceedings on part of the Bank's portfolio.

The Bank continuously monitors the judgments handed down and it will adjust the level of estimation of the impact of legal risk to the current line of case law. At the same time, the Bank is aware that the assumptions made are subjective

assessments of the current situation, which may change in the future. In estimating the impact of legal risk, the Bank relies on all information available at the date of signing the Financial Statements.

Individual settlements offered by the Bank

Since December 2021, the Bank is involved in individual negotiation processes with its Customers with whom the Bank is in dispute or about whom there is a reasonable risk of entering into a dispute. The Bank has taken this parameter into account when updating the total impact of legal risk.

At 31 December 2024, the Bank had presented individual settlement proposals to 13.915 Customers (12.807 Customers at 31 December 2023) and 6.202 Customers accepted the terms of the proposals presented (4.237 in 2023), of which 5.550 settlements were signed (3.567 settlements signed in 2023).

Case law of the Court of Justice (EU)

On 12 January 2024, the CJEU issued an order in Case C-488/23, concerning the admissibility of the judicial valorisation of a Bank's consideration in the form of the paid-up capital of a loan. Referring to Case C-520/21, the CJEU pointed out that, where a credit agreement is declared invalid in its entirety as a result of the elimination of abusive clauses from it, the provisions of Directive 93/13 preclude a judicial interpretation of the law of a Member State according to which a credit institution is entitled to demand from the consumer in addition to reimbursement of the capital disbursed pursuant to the credit agreement and statutory default interest from the date of the demand for payment, compensation consisting in a judicial adjustment of the benefit of the capital disbursed in the event of a material change in the purchasing power of money after that capital has been paid to the consumer.

On 25 April 2024, the CJEU issued judgments in cases C-484/21 and C-561/21, concerning the running of limitation periods for claims raised on the basis of claims that the terms are unlawful.

In the first judgment, the CJEU ruled that the provisions of Directive 93/13 preclude:

- the limitation period for a claim for reimbursement of expenses incurred by the consumer when concluding a contract with the trader in respect of a term which has been declared unfair by a final court ruling subsequent to the payment of those expenses runs from the date of that payment, irrespective of whether the consumer was or could have been aware of the unfair nature of the term at the time of that payment or before that term was declared void by the judgment,
- the limitation period for a claim for reimbursement of costs incurred by a consumer on the basis of a term in a contract with a trader which has been found unfair by a final judgment of a court shall run from the date on which the national supreme court delivered an earlier judgment, in a separate case, declaring a standard term corresponding to that term in that contract unfair.
- In the second judgment, the CJEU ruled that the provisions of Directive 93/13:
- do not preclude the limitation period for a claim for the reimbursement of expenses incurred by a consumer in respect of a contract term declared unfair by a final judgment of a court following payment of those expenses from running from the



date on which the judgment becomes final, subject to the trader being able to prove that the consumer knew or could have known of the unfair nature of the term in question before that judgment became final,

- preclude the running of the limitation period for a claim for the reimbursement of costs incurred by a consumer in respect of a term in a contract concluded with a trader the unfair nature of which has been established by a final court judgment subsequent to the payment of those costs from commencing on an earlier date on which the national supreme court has, in separate cases, given judgments declaring unfair the terms corresponding to the relevant term in that contract,
- preclude the limitation period for a claim for reimbursement of costs incurred by a consumer on the basis of a term of a contract concluded with a trader which has been declared unfair by a final judgment of a court from running from the date of certain judgments of the CJEU which confirmed in principle the compatibility with Union law of the limitation periods for claims for reimbursement.

The CJEU confirmed that a consumer's claim to establish the unfairness of contractual terms is not time-barred, whereas a consumer's restitutionary claims (for reimbursement of benefits fulfilled on the basis of unfair contractual terms) may be time-barred, provided that the time limits provided for in national law do not make it impossible or excessively difficult for the consumer to pursue claims under Directive 93/13. The CJEU reiterated that the limitation period for a consumer's restitutionary claim cannot start to run before the consumer has become aware of the unfair nature of the contractual term in question. In particular, the time limit cannot start to run already on the date of the consumer's performance of the wrongful act or on the date of a judgment of the CJEU (e.g. in Case C-260/18) or the Supreme Court in another similar case (without the involvement of that consumer), if at that time the consumer had no knowledge of the unfair nature of the term. According to the CJEU, the starting date of the limitation period of a consumer's claim may be, in particular, the date on which the court issues a final judgment in a case involving the consumer, if it was only on that date that the consumer became aware of the unfair nature of the condition in question. Due to the scope of the preliminary questions, the CJEU did not rule on the limitation period of the Bank's claims.

On 24 October 2024, it delivered its judgment in Case C-347/23, concerning the concept of Consumer. According to the CJEU, Directive 93/13 must be interpreted as meaning that an individual who concludes a mortgage credit contract to finance the purchase of a single residential property with a view to renting it out for a consideration falls within the concept of Consumer within the meaning of the Directive if that individual is acting for purposes which are outside his trade, business or profession. The mere fact that that natural person seeks to derive an income from the management of that property cannot, in itself, lead to the exclusion of that person from the concept of Consumer.

Supreme Court resolution of 25 April 2024.

On 25 April 2024, the entire Civil Chamber of the Supreme Court adopted the so-called "large franking resolution", resolving the key legal issues, ref. III CZP 25/22, according to which:

- If a provision of an indexed or denominated credit agreement relating to the manner in which the foreign currency exchange rate is to be determined constitutes an illicit contractual term and is not binding, it cannot be assumed in the current state of the law that another manner of determining the foreign currency exchange rate resulting from law or custom takes its place.

- If it is not possible to establish a foreign currency exchange rate binding on the parties in an indexed or denominated credit agreement, the agreement is also not otherwise binding.
- If in the performance of a loan agreement which is not binding due to the illicit nature of its provisions, the Bank has paid all or part of the loan amount to the borrower and the borrower has made loan repayments, independent claims for the return of the wrongful performance arise in favour of each party.
- If a credit agreement is not binding due to the illicit nature of its provisions, the statute of limitations for the Bank's claim for reimbursement of amounts paid under the credit begins, in principle, from the day following the day on which the borrower challenged the Bank on its bindingness to the provisions of the agreement.
- If a credit agreement is not binding due to the illicit nature of its terms, there is no legal basis for either party to claim interest or other consideration for the use of its funds during the period from the time the wrongful performance is made until it falls into delay as to the repayment of that performance.

The Resolution was passed by a majority. There were dissenting opinions from 6 of the 17 judges, primarily as to whether the agreement should be upheld after the elimination of the conversion clauses. In its wording, the resolution refers only to the effects of declaring conversion clauses in indexed or denominated loan agreements abusive (without prejudging the abusiveness of such clauses). The resolution does not apply to foreign currency loans, where the conversion clauses are of an optional nature and as such are not necessary for the performance of the contract.

In an explanatory memorandum to the resolution published in September 2024, the Supreme Court:

- distinguished between indexed, denominated and foreign currency loans, indicating that a foreign currency loan should refer to a loan whose amount is denominated in a foreign currency, with disbursement by the Bank and repayment by the borrower in the same currency. This type of credit is not the subject of the resolution,
- confirmed that the limitation period for a bank's claims does not start to run from the date of disbursement of the loan, but only from the date on which the consumer challenges the validity of the agreement with the bank,
- stated that the will of the consumer not to be bound by an illicit provision may be expressed in any way, including implicitly,
- pointed out that exercising the right of set-off makes it possible, in part, to prevent the negative consequences of the statute of limitations of claims, since, according to Article 502 of the Civil Code, the statute of limitations of a claim does not preclude its set-off if, at the time when the set-off became possible, the statute of limitations had not yet expired.
- pointed out that if the defendant has not yet taken action to make the claim contestable, a set-off may be raised not only at the first stage of the process: the legislator takes into account the necessity to address an appropriate request for payment, and then only after two weeks have elapsed since the claim has become due, the subject loses the right to raise a set-off objection. Finally, the defendant may defend himself or herself by filing a counterclaim or by making use of the institution of an anti-enforcement action.

It should be emphasised that the position of the Supreme Court expressed in the explanatory memorandum does not unequivocally resolve the existing divergences in case law regarding the definition of foreign currency credit. However, the



Supreme Court noted that in the case of foreign currency loans in which there is no problem of abusiveness in determining the exchange rate when the bank disburses the loan, or in which, as a result of the removal of this abusiveness, the agreement is still in force in a form in which, in principle, it is possible to repay the loan in foreign currency, it may be assumed that Article 358 § 2 of the Civil Code, as the relevant dispositive provision (i.e. the agreement may be continued using the average exchange rate of the NBP), applies to the conversion of the exchange rate.

Supreme Court case law on CHF denominated and foreign currency loans

On 19 June 2024, a seven-member panel of the Civil Chamber of the Supreme Court issued a resolution in Case III CZP 31/23, in which it indicated that the right of retention (Article 496 of the Civil Code) does not apply to a party that can set off its claim against the claim of the other party. The justification states that although the possibility of applying the right of retention does not raise doubts when the parties' performances are not homogeneous, in a situation in which both parties are obliged to mutually perform monetary performances, the Civil Code provides for a more far-reaching institution, namely the set-off of mutual receivables (Article 498 et seq. of the Civil Code), the effect of which is to cancel the receivables up to the amount of the lower receivable, without the risk of the other party's insolvency. Since the right of retention - as a subsidiary instrument - gives way before other types of security, it should give way even more before set-off as an institution aimed at the satisfaction of claims.

On 2 July 2024, a three-judge panel of the Supreme Court in Case III CZP 2/24 resolved that a power of attorney is sufficient for the effectiveness of raising a charge of set-off under Article 2031 of the Code of Civil Procedure and receiving such a declaration. The Supreme Court stated that in view of the rationality of the legislator and the coherence of the legal system, it should be assumed that the allegation of set-off was built on the construction of a substantive set-off, allowing it to be raised by a legal representative.

Issues concerning the reciprocity of the credit agreement and the application of the law of retention will also be the subject of the Supreme Court's decision in Case III CZP 37/24 (formerly III CZP 89/22) - the legal issue has been submitted to a panel of seven judges of the Supreme Court for decision. The resolution adopted may be given the force of legal principle.

As at the end of 2024, 239 cassation appeals have been filed with the Supreme Court in CHF loan cases granted by the Bank, 50 appeals have been accepted by the Supreme Court for examination and are awaiting substantive decision, as to 129 cassation appeals, the Supreme Court has issued a decision on refusal of acceptance for examination. In 5 cases, the Court referred the cases for re-examination, while in 6 cases it dismissed the cassation appeal.

Compliance with other regulations

In 2024:

- no court or administrative proceedings have been initiated against the Bank or the Group for behaviour that violates the freedom of competition or antitrust laws,
- with regard to data protection data, the Group companies have not received any substantiated complaints regarding data leakage, theft or loss,
- no cases of non-compliance with regulations and/or voluntary codes on marketing communications (including advertising, promotion and sponsorship) have been reported,
- there were no fines or non-financial sanctions for non-compliance with environmental laws and/or regulations.

Selected regulatory changes affecting the banking sector

Changes that came into effect in 2024.

- Act of 7 July 2023 amending certain laws to mitigate certain effects of identity theft
- Act of 28 July 2023 on combating abuse of electronic communications
- Regulation (EU) 2023/2631 of the European Parliament and of the Council of 22 November 2023 on European green bonds and optional disclosure for bonds marketed as environmentally sustainable and sustainability-linked bonds
- Resolution No. 243/2023 of the Financial Supervision Authority of 26 June 2023 on the issuance of Recommendation U on good bancassurance practices
- Resolution No. 242/2023 of the Financial Supervision Authority of 19 June 2023 amending the resolution on the issuance of Recommendation S on good practices for the management of mortgage-backed credit exposures
- Act of 12 April 2024 amending the Act on support for borrowers who have taken out a home loan and are in financial difficulty and the Act on community financing for economic undertakings and assistance to borrowers
- Act of 20 March 2024 amending the Civil Code Act, the Consumer Credit Act and the Consumer Lombard Loan Act



Post-balance sheet events

Adaptation of the Bank to the requirements related to the implementation of the CRR 3 / CRD 6 regulatory package

The Bank has adjusted internal procedures, systems, and documentation in connection with the implementation of the Regulation of the European Parliament and Council (EU) 2024/1623 of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor.

Starting from January 2025, the Bank applies the following methods for determining the capital requirement under Pillar I: updated standard method for credit risk, new standard method for operational risk, and standard method for market risk.

As part of the completed implementation project, the Bank introduced necessary adjustments in the calculation of the capital requirement for credit risk, which are discussed below.

1. As part of the new class of exposures secured by property mortgages and ADC exposures, the Bank:

- implemented new definitions, in particular the concept of income generating property exposures (so-called IPRE exposure) and exposures related to the land acquisition, development and construction (so-called ADC exposure);
- developed a data-collection process for identifying eligibility criteria in relation to mortgage collateral;
- updated rules for assigning risk weights and segmentation of individual exposures within the exposure class;
- adjusted the process for new real estate valuation rules and updated the internal model for their valuation.

2. In terms of off-balance sheet exposures, the Bank:

- implemented a process related to the identification of liabilities entered into with counterparties, according to new definitions;
- updated segmentation of off-balance sheet exposures to new buckets and the credit conversion factors (CCF) assigned to them.

3. In terms of exposure to institutions, the Bank:

- implemented a new SCRA (Standardised Credit Risk Assessment Approach) method in relation to institutions for which it does not have information about the assigned external rating;
- updated rules for assigning risk weights for institutions with an external rating.

4. Regarding exposures associated with specialised lending, the Bank:

- implemented a process of segmenting exposures related to specialised lending into appropriate subcategories;
- adjusted the rules for assigning risk weights and developed a data-collection process for project information.

5. In terms of retail exposures, the Bank:

- identified exposures to the transactor, for which it assigns a preferential risk weight;
- adjusted the classification of retail exposures to the updated definition.

6. In terms of equity exposures, the Bank:

- took into account the new treatment of equity exposures in terms of assigning risk weights.

The Bank takes into account transitional provisions that allow the use of preferential approaches in the scope of individual exposure classes and rules for assigning the credit conversion factor for off-balance sheet exposures. Additionally, the Bank continuously monitors the register of documents published by the EBA, which are refining various issues related to the changes resulting from the CRR 3 Regulation.

The Bank has also made changes in operational risk, including implementing a new method for calculating requirements and updating the operational risk management framework.

Due to the postponement of the implementation of the modified rules for determining capital requirements for the trading book, within the so-called FRTB (Fundamental Review of Trading Book), the standard method will be applied for the market risk, based on the rules in effect before 1 January 2025. This means that the interest rate risk requirement will be determined based on the maturity ladder method, the foreign exchange risk based on the standard method, and non-linear risks resulting from maintaining positions in option instruments based on the delta-plus method.

As a result of the changes made to the rules for calculating capital requirements, adjustments will also be made to the disclosure of information under Pillar 3. These changes will apply from the disclosure for 31 March 2025.

The introduction of the above changes to the rules for determining capital requirements (assuming data as at 31 December 2024 for the purposes of calculation) would result in an increase in risk-weighted assets by PLN 3,131,512 thousand and a change in the Group's capital ratios by -43 bps for CET1, -45 bps for Tier 1 and -56 bps for the Total Capital Ratio.

The bank constantly monitors its capital position and potential and planned changes to the rules for determining capital requirements. Taking into account the introduction of the changes described above starting from January 2025, in the fourth quarter of 2024, the Bank took appropriate adjustment actions in the area of own funds (including by issuing capital bonds - AT1 instruments in November).

After taking into account changes in the rules for determining capital requirements, the Bank meets the regulatory capital requirements.



Statements of the Management Board of BNP Paribas Bank Polska S.A.

Accuracy and reliability of the statements presented

The Management Board of BNP Paribas Bank Polska S.A. hereby declares that to the best of its knowledge:

- The Separate Financial Statements of BNP Paribas Bank Polska S.A. for the year ended 31 December 2024 and the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2024 and the comparative data have been prepared in accordance with the applicable accounting principles and give a true, fair and clear view of the financial position and financial performance of the Bank and the Bank Group.
- Management Board's Report on the Activities of BNP Paribas Bank Polska S.A. Group in 2024 (including Report of the Management Board on the activities of BNP Paribas Bank Polska S.A. in 2024 and Sustainability Report of BNP Paribas Bank Polska S.A. Group for the year 2024) provides a true picture of the development, achievements and situation of the Bank Group, including a description of the principal risks and threats.

Position of the Bank's Management Board on the possibility of meeting previously published forecasts for a given year

The Bank has not published financial performance forecasts for 2024.

Information of the Management Board, prepared on the basis of a statement of the Supervisory Board or a supervising person, on the selection of an audit firm to audit the annual financial statements and the annual consolidated financial statements in accordance with the regulations

The Management Board of BNP Paribas Bank Polska S.A. declares that Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. based in Warsaw (Ernst & Young), was selected by the Bank's Supervisory Board on 15 September 2023 pursuant to the provisions of the law as the entity authorised to audit the Consolidated Financial Statements of the BNP Paribas Bank Polska Group for 2024 and the Separate Financial Statements of BNP Paribas Bank Polska S.A. for 2024.

Ernst & Young and the members of the audit team met the conditions for the preparation of an impartial and independent audit report on the annual financial statements and an audit report on the annual consolidated financial statements in accordance with applicable regulations, professional standards and professional ethics.

The Bank's Management Board declares that the applicable legal provisions related to the rotation of the audit firm and the key auditor and mandatory grace periods have been complied with and that the Bank has in place the "Policy on the selection of the audit firm at BNP Paribas Bank Polska S.A." and the "Procedure for the selection of the audit firm at BNP Paribas Bank Polska S.A.", as well as the "Policy on the provision of permitted non-audit services at BNP Paribas Bank Polska S.A. by the audit firm, by affiliates of the audit firm and by members of the audit firm's network".



SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF BNP PARIBAS BANK POLSKA S.A.

12.03.2025	Przemysław Gdański President of the Management Board	<i>signed with a qualified electronic signature</i>
12.03.2025	André Boulanger Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
12.03.2025	Małgorzata Dąbrowska Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
12.03.2025	Wojciech Kembłowski Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
12.03.2025	Piotr Konieczny Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
12.03.2025	Magdalena Nowicka Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
12.03.2025	Volodymyr Radin Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
12.03.2025	Agnieszka Wolska Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>