

**INFORMATION POLICY
OF BNP PARIBAS BANK POLSKA S.A.
REGARDING CAPITAL ADEQUACY**



BNP PARIBAS



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1. INTRODUCTION

- 1.1. This policy, hereinafter referred to as "Policy", constitutes the fulfillment of the disclosure obligations set out in Regulation of the European Parliament and of the Council (EU) No 575/2013 as of 26 June 2013 on prudential requirements for credit institutions and investment firms, amending Regulation (EU) No 648/2012 (Official Journal EU L. 176, p. 1 as amended) as amended, hereinafter referred to as "Regulation (EU) No 575/2013".
- 1.2. In accordance with the Regulation (EU) No 575/2013 BNP Paribas Bank Polska S.A. is obliged to disclose to the public the information referred to in item 3 of Policy, with the exception of irrelevant information, proprietary or confidential information.
- 1.3. The published scope of information is intended to provide market participants with a comprehensive picture of the risk profile of BNP Paribas Bank Polska S.A..
- 1.4. The Policy specifies the scope, frequency, timeline, place and form of disclosure, the rules for verification and approval of disclosed information, as well as the rules for reviewing and approving this Policy.

2. DEFINITIONS

The terms used in the Policy shall have the following meaning:

- 1) **Bank** – BNP Paribas Bank Polska S.A. with its registered office in Warsaw
- 2) **Information** – qualitative and quantitative information on capital adequacy described in point 3 of the Policy
- 3) **Recommendation M** - recommendation of Polish Financial Supervisory Authority, concerning operational risk management within the banks
- 4) **Recommendation R** - recommendation of Polish Financial Supervisory Authority, on the principles of classification of credit exposures, estimation and recognition of expected credit losses and credit risk management
- 5) **Recommendation Z** - recommendation of Polish Financial Supervisory Authority regarding the principles of internal order in banks
- 6) **Regulation (EU) No 575/2013** – Regulation of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012
- 7) **Regulation (EU) No 2024/3172** - Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards in order to execute Regulation (EU) No 575/2013 of the European Parliament and of the Council, with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013 of the European Parliament and of the Council and repealing Commission Implementing Regulation (EU) No 2021/637
- 8) **EBA/GL/2014/14** - Guidelines of the European Banking Authority on materiality, proprietary and confidentiality and disclosure frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) No 575/2013
- 9) **EBA/GL/2016/11** - Guidelines of the European Banking Authority on disclosure requirements under Part Eight of Regulation (EU) No 575/2013
- 10) **EBA/GL/2017/01** - Guidelines of the European Banking Authority on LCR disclosure to complement the disclosure of liquidity risk management under Article 435 of Regulation (EU) No 575/2013
- 11) **Principles** - the Bank's internal regulation "Principles of preparing data for the purposes of disclosing information on capital adequacy"



3. SCOPE OF INFORMATION DISCLOSED

- 3.1. Pursuant to the provisions of Regulation (EU) No 575/2013, the Bank publishes the quantitative and qualitative information referred to in Part Eight of Regulation (EU) No 575/2013 based on the data available at the highest national level of consolidation for the purposes of prudential consolidation, in accordance with requirements specified in Article 13 of Regulation (EU) No 575/2013.
- 3.2. In order to meet the disclosure requirements provided for in Regulation (EU) No 575/2013 and requirement indicated in Recommendation Z (30.1), the following scope of information is published:
- 1) risk management objectives and policies based on Article 435;
 - 2) scope of application based on Article 436;
 - 3) own funds based on Article 437, Article 437a and information on transitional provisions based on Article 473a;
 - 4) own funds requirements and risk-weighted exposure amounts based on Article 438;
 - 5) exposure to counterparty credit risk pursuant to Article 439;
 - 6) capital buffers based on Article 440;
 - 7) exposure to credit risk and dilution risk based on Article 442;
 - 8) encumbered and unencumbered assets pursuant to Article 443;
 - 9) use of the Standardised Approach based on Article 444;
 - 10) exposure to market risk based on Article 445;
 - 11) CVA risk based on Article 445a
 - 12) information on operational risk based on Article 446;
 - 13) key metrics based on Article 447;
 - 14) exposures to interest rate risk on positions not held in the trading book based on Article 448;
 - 15) exposure to securitization positions based on Article 449;
 - 16) remuneration policy based on Article 450;
 - 17) leverage ratio pursuant to Article 451;
 - 18) liquidity requirements pursuant to Article 451a;
 - 19) use of credit risk mitigation techniques pursuant to Article 453.
- 3.3. According to the Recommendation M (17), the Bank discloses additional information on operational risk.
- 3.4. According to Recommendation R (36.2), the Bank discloses additional information on the impaired credit risk exposure and calculation of write-offs and provisions.
- 3.5. The Bank as other systemically important institution in accordance with Article 433c of Regulation (EU) No 575/2013 does not disclose the information required for global systemically important institutions, in accordance with Article 441 of Regulation (EU) No 575/2013.
- 3.6. The obligation to disclose information on environmental, social and governance risk (ESG risk) is included in Article 13 and Part Eight of the CRR Regulation. Pursuant to the indicated provisions, in particular Article 449a of the CRR Regulation, the Bank is obliged to disclose ESG risk starting from 1 January 2025. However, due to the position of the European Banking Authority (EUNB) and the position of the Financial Supervisory Authority (UKNF) contained in letter No DRR-DRR3.7115.1.2025.MK of 10 July 2025, the Bank does not publish this information.
- 3.7. Disclosures regarding aggregate exposure to shadow banking entities in accordance with Article 449b of Regulation (EU) No 575/2013, will apply from the reference date of 31 December 2026, in accordance with



the position of the European Banking Authority (EBA) and the position of the Financial Supervision Commission (KNF) contained in letter No DRR-DRR3.7115.1.2025.MK of 10 July 2025.

- 3.8. The obligation to disclose information on crypto-assets defined in Article 5a of Regulation (EU) No 575/2013 results from Article 451b of Regulation (EU) No 575/2013, however, as of the date of entry into force of the Policy, the Bank does not identify such assets and therefore does not publish this information.

4. INFORMATION DISCLOSURE FREQUENCY AND DEADLINE

- 4.1. Information published pursuant to the Regulation (EU) No 575/2013 is published with the frequency specified in Article 433a of the Regulation (EU) No 575/2013, i.e.:

- 1) once a year, the Bank publishes the full scope of the Information, specified in point 3 of the Policy;
- 2) once every six months, the Bank publishes summary Information on:
 - own funds – Article no 437
 - own funds requirements and risk-weighted exposure amounts – Article no 438
 - exposure to counterparty credit risk – Article no 439
 - capital buffers – Article no 440
 - exposure to credit risk – Article no 442
 - use of the standardized approach – Article no 444
 - exposure to market risk - Article no 445
 - key metrics – Article no 447
 - exposure to interest rate risk for positions not included in the trading book – Article no 448
 - exposure to securitization positions – Article no 449
 - financial leverage – Article no 451
 - liquidity requirements – Article no 451a
 - use of credit risk mitigation techniques – Article no 453;
- 3) once a quarter, the Bank publishes condensed Information on:
 - own funds and risk-weighted exposure amounts – Article no 437 and 438
 - key metrics – Article no 447
 - liquidity requirements – Article no 451a.

- 4.2. Information based on the requirements of Recommendation M and Recommendation R are made public once a year.

- 4.3. Information is disclosed as at the end of the accounting period.

- 4.4. Pursuant to Article 433 of the Regulation (EU) No 575/2013 annual disclosures shall be published on the same date as the date on which the Bank publishes its financial statements or as soon as possible thereafter. Semi-annual and quarterly disclosures shall be published on the same date as the date on which the Bank publishes its financial reports for the corresponding period where applicable or as soon as possible thereafter.



5. INFORMATION DISCLOSURE MEANS AND FORM

- 5.1. The Bank publishes Information using the templates specified in Regulation (EU) No 2024/3172 and in the EBA/GL/2014/14 in the remaining scope. The Bank also takes into account provisions of EBA/GL/2016/11 and EBA/GL/2017/01 guidelines.
- 5.2. Information is published in electronic format at the Bank's website (www.bnpparibas.pl/) in the section "Investor Relations" in Polish and English.

6. VERIFICATION AND APPROVAL OF DISCLOSED INFORMATION

- 6.1. The relevant substantive divisions / organizational units of the Bank are responsible for the preparation of data and their verification in terms of correctness and completeness, as well as for assessing the adequacy of disclosed information in terms of providing market participants with a comprehensive picture of the Bank's risk profile. The control mechanisms and the responsibilities for control are set out in the Principles.
- 6.2. The Information is not subject to the comprehensive verification by an auditor hired to examine Bank financial statements. The Management Board of the Bank may decide to ask for the verification of any independent entity other than the auditor and to relevant internal organizational units / divisions of the Bank.
- 6.3. Auditor's verification relates to selected elements of information, which overlap with information contained in the Annual Consolidated Financial Statements of the Bank.
- 6.4. The Information, before its disclosure is subject to the approval of the Bank's Management Board and the Bank's Supervisory Board.

7. POLICY UPDATE

- 7.1. The provisions of the Policy are subject to review at least once a year.
- 7.2. The review of the Policy covers the following scope:
 - 1) verification of the required scope of disclosures
 - 2) assessment of the significance of the disclosed information
 - 3) frequency and dates of publishing Information
 - 4) use of reporting templates
 - 5) assigning responsibility for quantitative and qualitative information
 - 6) organization of the internal control process.
- 7.3. The Policy is introduced by a resolution of the Bank's Management Board and is approved by the Bank's Supervisory Board.