



BNP PARIBAS

MANAGEMENT BOARD'S REPORT ON THE ACTIVITIES OF THE BNP PARIBAS BANK POLSKA S.A. GROUP



2025

including Management Board's Report on the activities of BNP Paribas Bank Polska S.A. in 2025
and the Sustainability Statement of BNP Paribas Bank Polska S.A. Group in 2025

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.



Table of contents

Letter from the Chairperson of the Supervisory Board	3
Letter from the President of the Management Board	4
Key data 2021-2025	5

About us

Profile of the Group and the Bank	7
BNP Paribas Group worldwide	9
The Bank on the Warsaw Stock Exchange	9
Key events in 2025	13

Bank in its environment

Macroeconomic conditions	20
Results of the banking sector	22
Stock market and investments	24

Strategy and outlook

GObeyond 2022-2025 business strategy	27
Accelerate 2030 business strategy	30
Outlook	32

Implementation of the strategy

Pillar UP	36
Segment description	37
Distribution channels	47
Operations and business support area	49
Entities of BNP Paribas Bank Polska S.A. Group	49

Pillar POSITIVE	52
Sustainable financing	52
Positive banking	58
Community involvement	60
Environmental responsibility	66
Pillar STRONGER	68
Digitalisation and innovation – IT strategy	68
Support for innovation	72
Cybersecurity	74
Pillar TOGETHER	75
Good workplace	75
Remuneration	77
Diverse and inclusive workplace	78

Financial results

Financial results of the Group	80
Results of the business segments	99
Financial results of the Bank	103

Risks and opportunities

Risk management system	115
Principal types of risk	118

36

37
47
49
49

52	Sustainability Statement	134
52	General Disclosures (ESRS 2)	135
58	Climate change (ESRS E1)	160
60	Own workforce (ESRS S1)	181
66	Consumers and end-users (ESRS S4)	201
68	Business conduct (ESRS G1)	212
72	Additional information on the entity	219

75	Corporate governance	245
75	Compliance with corporate governance principles in 2025	246
77	Shares and shareholders	253
78	Statutory bodies of the Bank	255
79	Remuneration of the Management Board and the Supervisory Board	274
80	Diversity policy	276
99	Internal control system (including control and risk management system for the preparation of financial reports)	278
103	Information about the auditor	279

114	Other information	280
115	Legal compliance	281
118	Events after the balance sheet date	289
	Statements of the Management Board of BNP Paribas Bank Polska S.A.	290
	SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF BNP PARIBAS BANK POLSKA S.A.	291



Letter from the Chairperson of the Supervisory Board



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

the year 2025 was an important and successful year for BNP Paribas Bank Polska. We successfully completed the GO beyond strategy, achieving an ROE of 18.7%, more than 6 percentage points above our target assumption. The year-end C/I ratio was 41.2%, exceeding our expectations. I am particularly pleased that the bank reached a sustainable financing level of PLN 13.6 billion at the end of 2025, representing 14.6% of our portfolio, which is considerably more than our 10% target.

In 2025, despite substantial fiscal burdens, costs of provisions for CHF loans, declining interest rates, and geopolitical and regulatory uncertainty, we achieved record-high net banking income of PLN 8.2 billion and net profit of PLN 3.1 billion. There were several contributing factors, including an increase in business volume, growth in the foreign exchange and trading area, higher customer transaction rates, further improvements in efficiency (also due to the use of technology), control of operating expenses, and a decline in the cost of risk.

In 2025, the bank paid out a dividend for 2024 to its shareholders and, in line with our declarations, intends to remain a dividend-paying company.

Despite geopolitical disruptions on the global stage, the continuing war in Ukraine, and disturbances in global trade relations, last year proved to be very good for the Polish economy, which achieved record-high GDP growth compared to other EU countries (4% in the last quarter of 2025). Investments rising in 2025 under the National Recovery Facility (KPO) and the EU Framework 2021-2027, as well as growing household consumption, also serve as very positive predictors for 2026.

In this favourable macroeconomic environment, the BNP Paribas Group and BNP Paribas Bank Polska remain active in financing large strategic projects. We support key infrastructure projects and the energy transition, including the most ambitious project in this area: the construction of the Polish nuclear power plant. Last year, we also financed defence projects. The overall value of gross loans increased in both customer segments, reaching PLN 93.6 billion at the end of 2025 – a rise of 5.9% y/y.

The bank continued its technological development, including the development of a secure environment for working with generative artificial intelligence. In 2025, using an internal personal chat assistant, bank employees generated more than 34.5 million queries. We are increasingly using AI and machine learning to develop anti-fraud systems, enhancing the security of our customers in online channels through more effective detection of suspicious activities and fraud attempts. In 2025, we further strengthened the security of our IT infrastructure by developing the Threat Intelligence tool and strengthening network security, including via cloud technologies.

I feel great personal satisfaction whenever the knowledge, innovativeness and commitment of our bank's employees gain recognition on the market. In 2025, we received awards in numerous prestigious competitions, including the title of Top Employer, National Leader in Agribusiness Financing, Best Bank in Poland for SMEs (Global Finance award), plus accolades in the Institution of the Year contest ("Security", "Voice of the Customer", "Best Internet Banking", and "Best Personal Banking – Branch Service"), and two Golden Banker awards ("Cash

Loan" and Golden Cybersecurity Shield). Our Wealth Management team won the Wealth Management Business category for Central and Eastern Europe at the WealthBriefing European Awards and took first place in the Global Private Banking Innovation Awards.

In 2026, we will be guided by the Accelerate 2030 strategy, which has been positively received by investors and the market. It consists of three pillars: Expand, focused on significantly growing the customer base through unique benefits to enhance engagement; Streamline, leveraging new technologies to improve efficiency, and Impact, continuing to support sustainable transition. The strategic goals are ambitious, but essential to further strengthen the competitive position of the BNP Paribas Bank Polska Group.

I would like to extend my thanks to the bank's Management Board and employees for their exceptional dedication and efforts in transforming the bank, and to our customers for their continued trust.

Lucyna Stańczak-Wuczyńska

Chairperson of the Supervisory Board of BNP Paribas Bank Polska



Letter from the President of the Management Board



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

2025 was the last year when we were guided by the GO beyond strategy. We exceeded the financial targets set at the outset of that journey. The last 12 months of the strategy's horizon were a year of record-breaking results.

The net banking income of the BNP Paribas Bank Polska Group in 2025 was PLN 8.2 billion (+5.6% year on year), driven by growth across all the key lines. We generated the highest profit in history at PLN 3.1 billion (+29.7% year on year);

we increased our income while keeping costs under control – net of the BFG contribution, the costs would have dropped year on year. With a very good quality of the loan portfolio and lower costs of CHF loans, our cost of risk decreased.

Similar to previous year, it is the intention of the Management Board to pay a dividend at 50% of the net profit.

In 2025, we focused on growth and steady improvement of efficiency with new technology and process enhancements. Our loan portfolio increased to PLN 93.6 billion as at 31 December 2025 (+5.9% year on year). Importantly, financing of corporates, including investment loans and working capital loans, increased substantially. Loans to institutional Customers stood at PLN 59.1 billion (+6.5% year on year) and loans to retail Customers at PLN 34.4 billion (+4.8% year on year). Sustainable financing remains our strategic priority: it grew to PLN 13.6 billion in aggregate (+33.9% year on year). Our deposit base continued to grow and reached PLN 140.9 billion at the year's end (+8.0% year on year). The growth was reported in both Customer segments.

In December, our majority shareholder BNP Paribas completed an accelerated bookbuilding (ABB) and sold 9.2 million BNP Paribas Bank Polska shares, representing approximately 6.2 percent of the Bank's equity, which increased the Bank's free-float shares on the Warsaw Stock Exchange. The Bank's share price was PLN 130.5 as at the end of 2025, up by 53.2% year on year.

I believe that alongside the good results of 2025, this was supported by the reception of the Bank's new strategy Accelerate 2030. The strategic objectives are very ambitious. We plan to increase the number of active retail Customers by 1 million net, to grow our market share in corporate loans to 10%, to achieve annual average growth of income at 6%, to reduce the C/I to less than 38%, and

to generate return on tangible equity (ROTE) of 22% in 2030. The three pillars of the Accelerate 2030 strategy are: Expand (growing the scale of operations and the Customer base), Streamline (improving operational efficiency with new technology), and Impact (support Customers in sustainable transition).

The key to successful implementation of the plans is our people. I am grateful for the engagement, creativity and professionalism of our Bank's employees, and for their empathy. We are an organisation where values such as mutual support, inclusion and assistance to those in need are the foundation; we believe that we can grow our business effectively and responsibly. In 2025, our volunteering engagement confirmed that we care for our environment. The Bank's employees dedicated a total of more than 19,000 hours to helping others. Thank you! I count on your full mobilisation also this year. Under our new strategy, we will continue to develop our business with care and empathy.

I am positive that our experience, resilience and flexibility, combined with the invaluable support of the BNP Paribas Group, the biggest bank in the European Union, are all the assets we need to successfully pursue the ambitious objectives of our new strategy. The falling rate environment is not good for the banking sector, but we see it as an incentive to grow rather than an excuse. Prevailing geopolitical and regulatory uncertainty remains a risk whose impact on the industry is hard to predict. Nonetheless, the growing strength of the local economy makes me optimistic about the future. The year 2026 will bring challenges and great opportunities for Poland and the banking sector. We want to actively assist our Customers in seizing this opportunity.

Przemek Gdański

President of the Management Board of BNP Paribas Bank Polska



Key data 2021-2025

	2025	2024	2023	2022	2021
Balance sheet (PLN million)					
Total assets	180,725	167,540	161,026	150,109	131,777
Loans and advances to Customers*	91,174	85,854	86,248	88,631	86,299
Total equity	17,598	15,394	12,861	11,262	11,362
Amounts due to Customers	141,339	130,925	127,175	120,021	101,093
Statement of profit or loss (PLN million)					
Net profit	3,058	2,358	1,013	441	176
Adjusted net profit**	3,058	2,415	967	1,166	176
Net interest income	5,892	5,741	5,225	3,493	3,141
Net fee and commission income	1,261	1,249	1,211	1,137	1,049
Net banking income	8,185	7,753	7,283	5,352	4,809
Result on legal risk related to foreign currency loans	(499)	(796)	(1,978)	(740)	(1,045)
Net impairment of financial assets and provisions for contingent liabilities	(174)	(246)	(34)	(275)	(266)
General administrative expenses, depreciation and amortisation	(3,369)	(3,352)	(3,096)	(3,038)	(2,544)
Financial indicators (%)					
Net ROE	18.7%	16.9%	8.2%	3.9%	1.5%
Net ROA	1.8%	1.5%	0.7%	0.3%	0.1%
Cost/Income (C/I)	41.2%	43.2%	42.5%	56.8%	52.9%
Adjusted net ROE**	18.7%	17.3%	7.7%	10.2%	1.5%
Adjusted net ROA**	1.8%	1.5%	0.6%	0.8%	0.1%
Adjusted Cost/Income (C/I) without BFG and IPS**	38.8%	41.0%	41.1%	42.9%	49.9%
Net interest margin	3.46%	3.56%	3.43%	2.46%	2.51%

	2025	2024	2023	2022	2021
Share of NPLs in gross loans and advances portfolio***	2.8%	3.2%	3.0%	3.3%	3.6%
Cost of risk	(0.19%)	(0.28%)	(0.04%)	(0.30%)	(0.32%)
Total capital ratio	16.86%	17.20%	16.67%	15.55%	16.91%
Tier 1 capital ratio	13.60%	13.80%	12.51%	11.28%	12.33%
Shares					
Capitalisation (PLN million)	19,298	12,593	12,641	8,265	13,454
Number of shares (million)	148	148	148	148	148
Share price (end of period) (PLN)	131	85	86	56	91
Business information (thousand)****					
Number of Bank Customers:	2,694	3,017	4,186	4,227	4,117
Retail Customers	2,371	2,688	3,831	3,877	3,810
Institutional Customers	323	329	356	350	307
ESG					
Value of sustainable financing (PLN billion)	13.6	10.2	9.6	6.5	3.1
Number of active employees in the Group	7,255	7,512	7,740	8,020	8,048
Number of Customer Centres with “Barrier-Free Facility” certification	144	143	131	103	77

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 Net assets, Loans and advances to Customers and Share of NPLs (Stage 3), the column for 2022 presents restated figures. For indicators for which we use quarterly averages, the restated figures were adopted for all quarters of 2023. No recalculation of average values was made for previous years. Details of the definitions and assumptions used are presented in the Alternative Performance Measures section.

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

*** Adjusted figures calculated net of 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 defined as loans and advances in Stage 3 and POCI non-performing as presented in the note to the Consolidated Financial Statements*

***** Number of retail Customers (i.e. individuals and micro-enterprises) in 2024–2025 is presented according to the new definition: Customers with an existing valid contractual relationship. The decrease in the number of Customers results from the retail Customer base review carried out in 2025 (including the closure of inactive accounts). Data for 2021–2023 are presented in line with the definition applicable at that time.*



About us

- 7 Profile of the Group and the Bank
- 9 BNP Paribas Group worldwide
- 9 The Bank on the Warsaw Stock Exchange
- 13 Key events in 2025



Profile of the Group and the Bank

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 consumer loans. For private banking Customers, we offer a comprehensive offer including protection, optimisation and growth of wealth. The Bank’s Customers can use our 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 in the agro-food sector. We specialise 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 to 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 cooperate with partner stores and selected car dealers.

As a 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 by total assets in the domestic banking sector. Employment in the Group measured in active FTEs is 7.2 thousand.

The BNP Paribas Bank Polska Group operates on the basis of operating segments (each business line’s share of the Group’s net banking income (NBI) for the 12 months of 2025 is shown below in %):

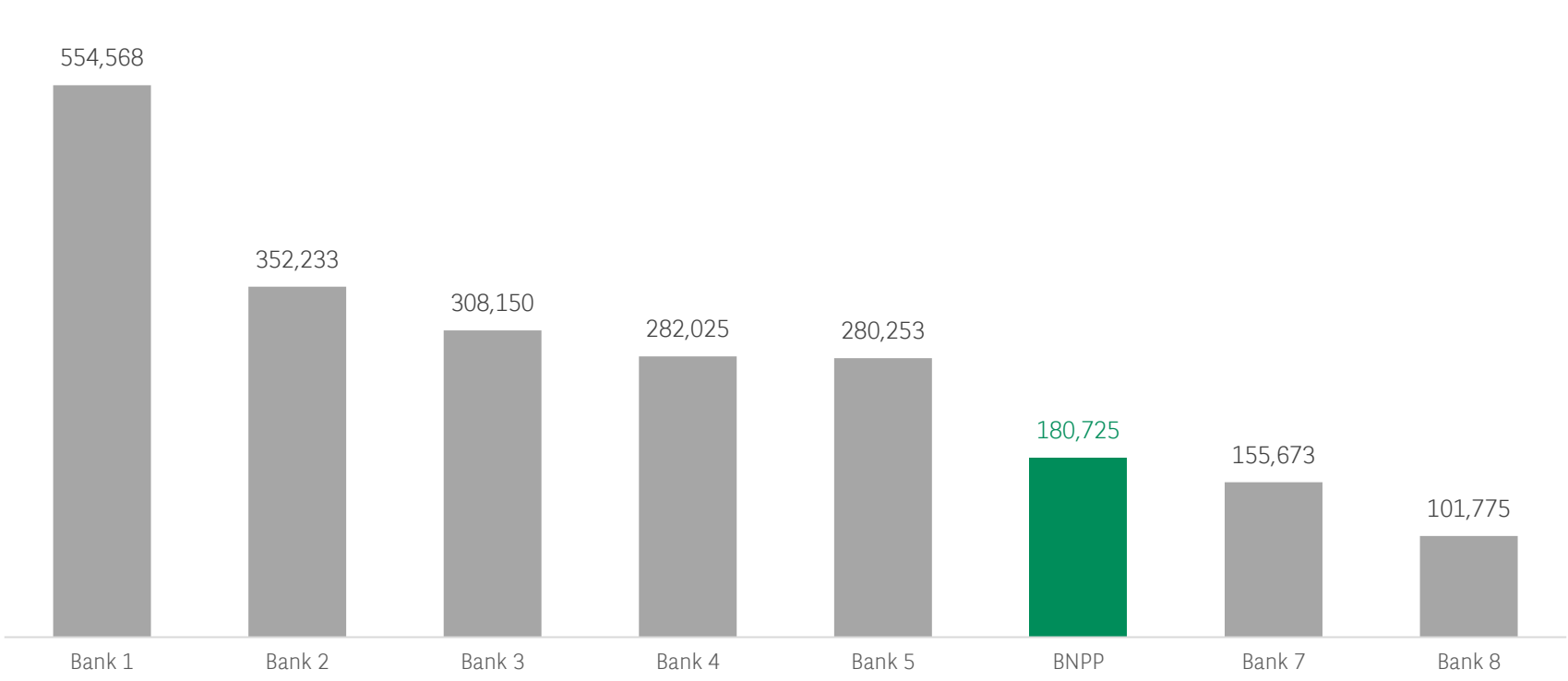
- Retail and Business Banking – serves retail Customers, including private banking Customers (Wealth Management) and business Customers, including micro-enterprises. The largest share of NBI – 48.8%,
- Corporate Banking – offers a wide range of financial services to large and medium-sized enterprises, local governments and entities that are part of international groups. Share of NBI – 27.4%,
- Small and Medium-sized Enterprise Banking – serves Agro and non-Agro Customers. Share of NBI -9.7%,
- Corporate and Institutional Banking (CIB) – supports the sale of Group products to Polish companies and serves strategic Customers. Share of NBI – 5.5%,
- Other banking operations include the Asset and Liability Management Division and the Corporate Centre. Share of NBI – 8.5%.

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.

Bank’s 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 as at 31 December 2025 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 this 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

	31.12.2025	31.12.2024
Loans to non-bank Customers including:	5.65%	5.67%
Loans for retail Customers	4.69%	4.79%
Non-financial business entities	8.85%	8.82%
Deposits from non-bank Customers including:	5.59%	5.67%
Deposits from retail Customers	4.39%	4.43%
Non-financial business entities	8.88%	9.33%

In loans to non-bank Customers, the Bank’s market share in the sector remained stable, amounting to 5.65% at the end of 2025 compared with 5.67% at the end of 2024. A slight decline in market share occurred in the category of loans to retail Customers, but this was partially offset by an increase in the segment of loans to non-financial entities. A modest decline in the market share in loans affected PLN mortgage loans and consumer loans as a consequence of slower growth in the Bank’s volumes relative to the growth observed in the banking sector. It should be emphasised that the first half of 2025 brought a slow-down of decline and the second half of the year a recovery of the Bank’s market share in PLN mortgage loans following an easing of the previous more selective and more conservative credit policy and a pronounced increase in sales.

The Bank’s share of non-bank Customer deposits decreased modestly to 5.59% from 5.69% at the end of 2024. This was due to a decrease in the Bank’s share of deposits from non-financial entities as their volume was growing less fast at the Bank (compared with the end of 2024) relative to the growth observed in the banking sector.

Group structure and subsidiaries subject to consolidation

BNP Paribas Bank Polska S.A. (the Bank) is the parent entity of the BNP Paribas Bank Polska S.A. Group (the Group) operating in Poland. The subsidiaries that are part of the Group as at 31 December 2025 (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. Group as at 31 December 2025



The structure of the BNP Paribas Bank Polska S.A. Group did not change in 2025.

In addition to Group companies, the Bank held equity investments in infrastructure companies as at 31 December 2025, including Biuro Informacji Kredytowej S.A., Krajowa Izba Rozliczeniowa S.A., VISA Inc., Mastercard Inc. and SWIFT. We 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 view 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 parties resulted from ongoing operational activities and mainly included loans, deposits, derivative transactions, income and 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 Bank Polska S.A. Group for the year ended 31 December 2025.



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 specialised business units,
- Investment & Protection Services – savings, investment and insurance services.

The BNP Paribas Group supports 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.

The BNP Paribas Group operates in 64 countries and employs almost 178 thousand people, including 144 thousand in Europe.

Since 2022, the BNP Paribas Group has been implementing the GTS strategic plan for 2022-2026. The strategy is built on three pillars: growth, technology, and sustainability.

The BNP Paribas Group’s GTS strategy ambitions:

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

The Bank on the Warsaw Stock Exchange

Shareholding structure

As at 31 December 2025, 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 75.00% of the votes. The remainder of the Bank’s shares, i.e. 25.00% were in free float.

The Bank’s shares are listed on the Main Market of the Warsaw Stock Exchange since 27 May 2011 (the new listing of Bank Gospodarki Żywnościowej S.A.). Following the quarterly revision of exchange index portfolios on 5 June 2025, the Bank’s shares participate in the mWIG40 index.

PLBGZ0000010

ISIN

BNPPPL

short name

BNP

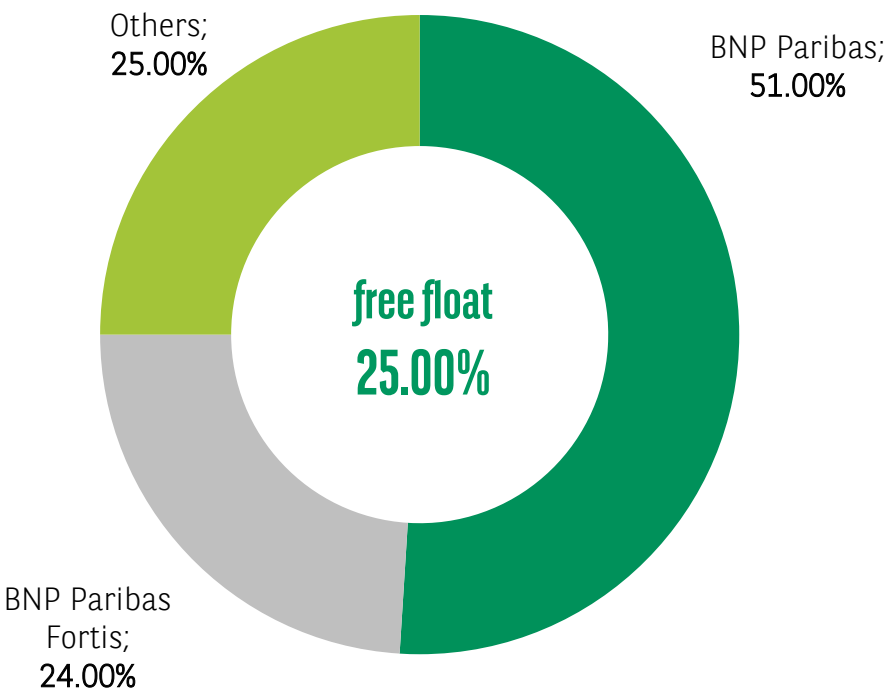
ticker

mWIG40 and mWIG40TR

index membership

Chart 2. Shareholder structure as at 31 December 2025

Total number of shares 147,880,491



In December 2025, following the settlement of block trades made on 12 December 2025 in connection with accelerated bookbuilding addressed solely to institutional investors covering 9,214,025 Bank shares, the share of BNP Paribas SA in total votes of the Bank decreased by approximately 6.23%. As a result, free float was 25.00% as at 31 December 2025 (up from 18.77%), supporting the liquidity of the Bank’s shares.



Share price

The year 2025 saw an improved market on the Warsaw Stock Exchange, as reflected in all-time highs of the WIG index which covers all WSE-listed companies.

The WIG-Banks index gained 55.3% (19,177.37 points as at 30 December 2025 vs. 12,345.94 points as at 30 December 2024). WIG-Bank hit its annual high of 19,364.67 points on 13 August 2025 and an annual low of 12,358.47 points on 2 January 2025.

The closing price of the Bank's shares was PLN 130.5 as at 30 December 2025, up 53.2% compared to PLN 85.20 on 30 December 2024. The Bank's shares hit an annual low of PLN 85.20 on 30 December 2024 and PLN 86.40 on 2 January 2025 and an annual high of PLN 135.00 on 22 December 2025.

The WIG-Banks index gained 33.1% in H1 2025. The key drivers of bank share performance included high interest rates up to May 2025, generating high net interest income; improved sentiment of international investors; and higher dividends compared to previous years.

In H2 2025, the decision to raise the corporate income tax rate for banks and five interest rate cuts by the Monetary Policy Council (six cuts in all of 2025) adversely affected bank share prices, as reflected in lower WIG-Banks gains (16.7%) compared to H1 2025.

In Q1 2025, positive bank share performance was driven by stable interest rates, strong earnings, expected record-high dividends, and the comeback of international investors to the local equity market. WIG-Banks gained 29.8% in Q1 2025 and the Bank's share price gained 29.1% reaching PLN 110.0. The Bank's shares hit a quarterly high of PLN 112.00 on 26 and 27 March 2025 and a quarterly low of PLN 85.20 on 30 December 2024 and PLN 86.40 on 2 January 2025.

In Q2 2025, bank share prices were impacted by the first interest rate cut after October 2023, uncertainty around potential further rate cuts (the second cut took place on 2 July 2025), and geopolitical conditions. As a result, WIG-Banks gained only 2.5% in Q2 2025 and the Bank's share price lost 3.2% reaching PLN 106.50. The Bank's shares hit a quarterly high of PLN 113.00 on 1 and 2 April 2025 and a quarterly low of PLN 99.00 on 11 and 13 June 2025.

A cumulation of adverse factors in the second half of Q3 2025, including the expected raise of the corporate income tax rate for banks, a negative outlook of public debt and deficit in 2026, and a downgrade of Poland's outlook rating, was reflected in WIG-Banks losing 0.4% in Q3 2025. The Bank's share price lost 2.8% reaching PLN 103.50. The Bank's shares hit a quarterly low of PLN 102.00 on 11 July and 5 August 2025 and a quarterly high of PLN 118.0 on 19 August 2025.

The Bank's share price at the end of Q4 2025 was PLN 130.50, up by 26.1% quarter on quarter. The Bank's shares hit a quarterly low of PLN 102.50 on 1 and 17 October 2025 and a quarterly high of PLN 135.0 on 22 December 2025. The WIG-Banks index gained 17.2% in Q4 and closed at 19,177.37 points.

Chart 3. Bank share price and turnover from 30 December 2024 to 30 December 2025

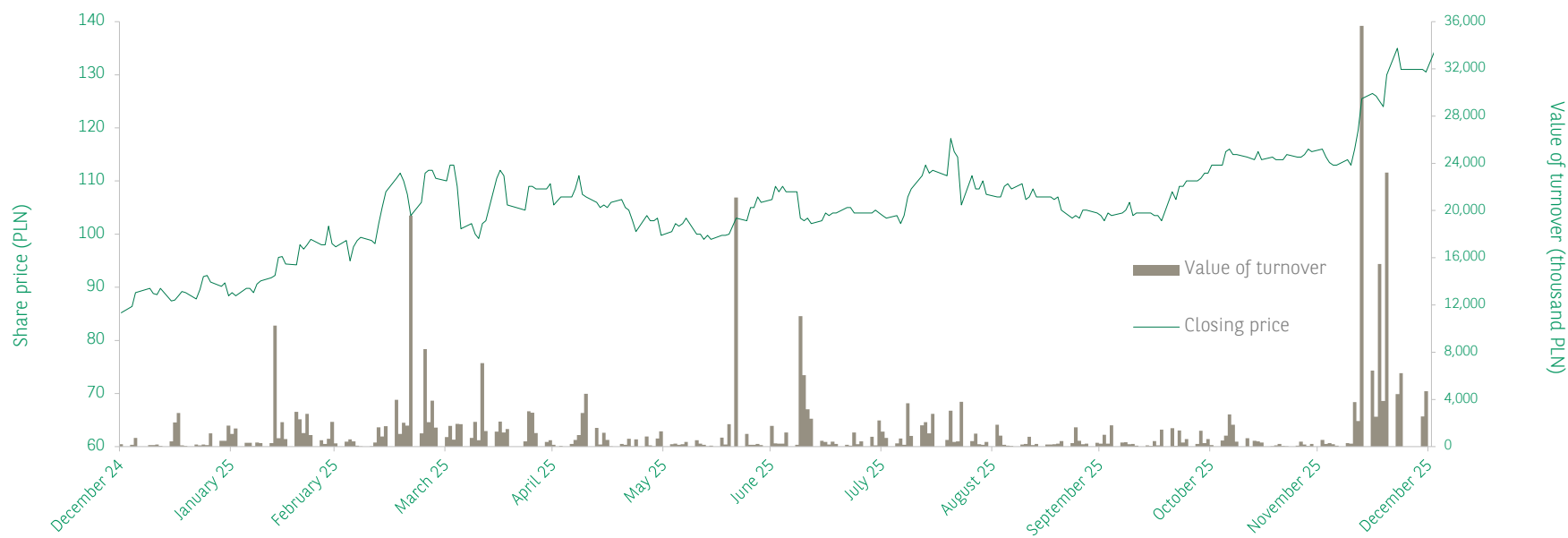
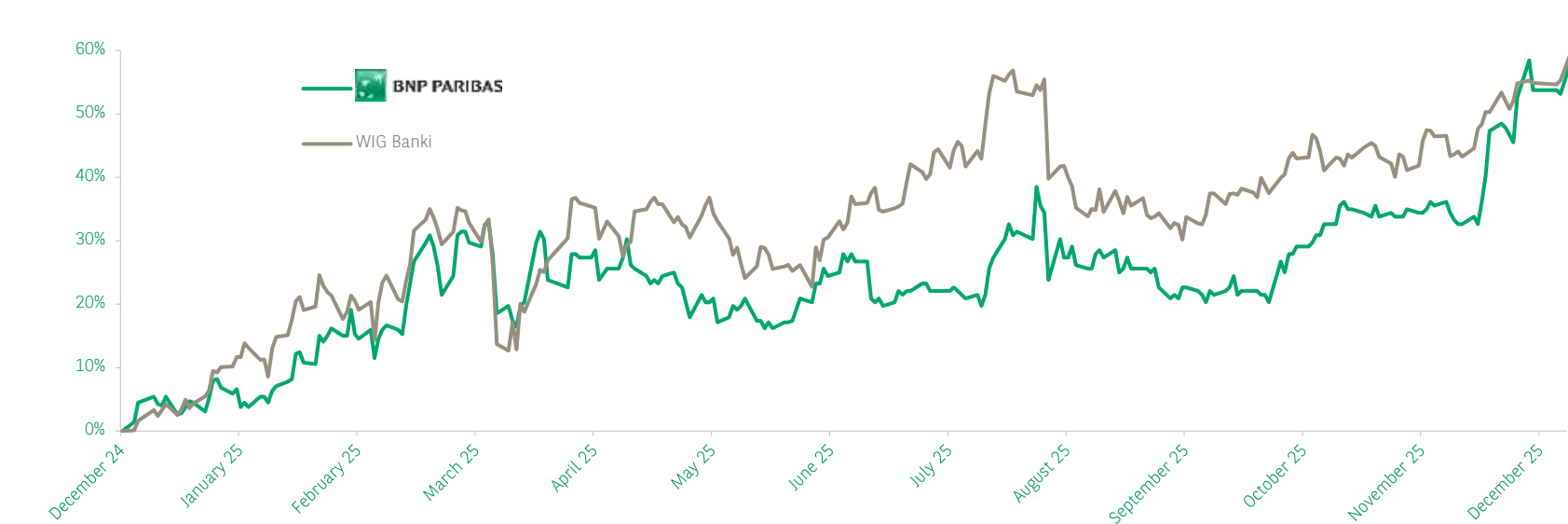


Chart 4. Bank share price performance vs. WIG-Banks from 30 December 2024 to 30 December 2025 (30 December 2024 = 100%)



The daily average share price in each quarter of 2025 was as follows: PLN 96.27 in Q1, PLN 104.72 in Q2, PLN 106.63 in Q3, PLN 113.69 in Q4.

The daily average turnover volume was 15,329.44 shares in Q1 2025, falling to 12,411.39 shares in Q2 2025 and 9,853.86 shares in Q3 2025. The increase in free-float shares, as mentioned above, helped the daily average turnover volume to



grow to 17,864.94 shares in Q4 2025. The daily average turnover volume in 2025 was down 6.9% year on year (13,876 shares vs. 14,890 shares).

The daily average turnover value in each quarter of 2025 was as follows: PLN 1,521.8 thousand, PLN 1,297.5 thousand, PLN 1,044.4 thousand, and PLN 2,196.7 thousand. The turnover volume hit an annual high of 283,727 shares and the turnover value hit an annual high of PLN 35,650.6 thousand on 12 December 2025.

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

	2025	2024	2023	change y/y 2025/2024
Share price at year-end (PLN)	130.50	85.20	85.60	53.2%
Average share price (PLN)	105.29	95.88	59.82	9.8%
Maximum share price (PLN)	135.00	112.00	86.20	20.5%
Minimum share price (PLN)	85.20	81.00	46.80	5.2%
WIG-Banks value at year-end (points)	19,177.37	12,345.94	11,062.01	55.3%
Number of shares at year end (# shares)	147,880,491	147,799,870	147,676,946	0.1%
Capitalisation at year-end (PLN thousand)	19,298,404	12,592,549	12,641,147	53.3%
Average turnover volume per session (# shares)	44,880.35	14,889.66	10,413.86	201.4%
Average turnover value per session (PLN thousand)	5,661.27	1,482.14	633.00	282.0%
Earnings per share (PLN)*	20.67	15.96	6.86	29.6%
P/E*	6.31	5.34	12.48	18.2%
Book value per share (PLN)*	119.00	104.15	87.09	14.3%
P/BV*	1.10	0.82	0.98	33.7%

*based on consolidated data

Ratings

At the end of 2025, the Bank had a rating from the rating agency Fitch Ratings (solicited by the Bank). The history of rating changes by the agency can be found on the Bank’s website: <https://www.bnpparibas.pl/relacje-inwestorskie/o-banku/oceny-ratingowe>.

The last rating update took place on 27 October 2025. The Bank’s credit ratings confirmed in the Fitch Ratings communication are presented below:

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

The Bank’s overall rating including BNP Paribas Group support (LT IDR A+) was confirmed. The Bank’s rating excluding BNP Paribas Group support (Viability Rating) was upgraded from bbb- to bbb in view of significant reduction of the legal risk of CHF mortgage loans. Following changes to Poland’s sovereign rating, the outlook was downgraded from stable to negative.

The Bank’s IDR and SSR ratings reflect Fitch Ratings’ belief in the potential support of the Bank’s parent entity, 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.

ESG rating

In September 2025, the **rating agency Morningstar Sustainalytics** updated the Bank’s ESG Risk Rating based on changes to its assessment methodology. As a result, the Bank recorded a score of 11.5 (the lower the score, the higher the resilience to various types of risk), which represents an increase compared with previous years (9.8 in 2024 and 10.2 in 2023). A score at this level corresponds to a risk category defined by the agency as “Low Risk.” In 2024, the terms of cooperation with Morningstar Sustainalytics changed – the ESG Risk Rating for 2025 was assigned on an unsolicited basis, meaning it was not commissioned by the Bank. Disclaimer: <https://www.sustainalytics.com/legal-disclaimers>.



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 disclosing 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 and its 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 2025, the Bank made the digital version of the annual report available for the sixth time. The report for 2024 is available at: <https://raportroczny.bnpparibas.pl/en/>.

At the end of January 2026, the Bank had 8 recommendations from financial institutions: 7 “Buy” (“Overweight”, “Accumulate”) and 1 “Hold”. The median target price from the recommendations was PLN 144.7 and the average target price was PLN 144.1.



Key events in 2025

Key corporate events



March 2025

- **14 March** – Individual recommendation of the Polish Financial Supervision Authority on the criteria of dividend payment up to 50% of 2024 net profit. In view of the strong quality of the Bank’s loan portfolio, the possible dividend rate was raised to 75%.
- **27 March** – Information on the annual contribution the bank resolution fund at **PLN 156,118 thousand for 2025 set by the Bank Guarantee Fund** for BNP Paribas Bank Polska S.A.



April 2025

- **7 April** – Issue of series M shares under a conditional share capital increase and change of the share capital of BNP Paribas Bank Polska S.A.

According to a statement from the Central Securities Depository of Poland (KDPW) and a resolution of the Management Board of the Warsaw Stock Exchange (WSE), as per the Bank’s current report no. 9/2025, the following were registered in KDPW and admitted to trading by WSE on 7 April 2025:

- 20,223 series M ordinary bearer shares of the Bank with a nominal value of PLN 1 per share (Series M Shares), which were recorded in the securities accounts of their holders.

The Series M Shares were issued under a conditional share capital increase of the Bank pursuant to Resolution No. 5 of the Extraordinary General Meeting of the Bank of 31 January 2020 as amended by Resolution No. 37 of the Annual General Meeting of the Bank of 29 June 2020. The Series M Shares were taken up in performance of rights attached to previously acquired individual series A5 subscription warrants, each of which conferred the right to take up one Series M Share.

According to the second sentence of Article 451 (2) of the Commercial Companies Code, the award of the Series M Shares took effect when the Shares were recorded in the securities accounts of their holders.

As a result, under Article 451 (2) in conjunction with Article 452 (1) of the Commercial Companies Code, rights were acquired in 20,223 Series M Shares with a nominal value of PLN 20,223 and **the Bank’s share capital was increased** from PLN 147,799,870 **to PLN 147,820,093**, divided into 147,820,093 shares with a nominal value of PLN 1 per share.



April 2025

- **8 April** – Issue of series N shares under a conditional share capital increase and change of the share capital of BNP Paribas Bank Polska S.A.

According to a statement from the Central Securities Depository of Poland (KDPW) and a resolution of the Management Board of the Warsaw Stock Exchange (WSE), as per the Bank’s current report no. 11/2025, the following were registered in KDPW and admitted to trading by WSE on 8 April 2025:

- 60,398 series N ordinary bearer shares of the Bank with a nominal value of PLN 1 per share (Series N Shares), which were recorded in the securities accounts of their holders.

The Series N Shares were issued under a conditional share capital increase of the Bank pursuant to Resolution No. 39 of the Extraordinary General Meeting of the Bank of 27 June 2022. The Series N Shares were taken up in performance of rights attached to previously acquired individual series B2 subscription warrants, each of which conferred the right to take up one Series N Share.

According to the second sentence of Article 451 (2) of the Commercial Companies Code, the award of the Series N Shares took effect when the Shares were recorded in the securities accounts of their holders.

As a result, under Article 451 (2) in conjunction with Article 452 (1) of the Commercial Companies Code, rights were acquired in 60,398 Series N Shares with a nominal value of PLN 60,398 and **the Bank’s share capital was increased** from PLN 147,820,093 **to PLN 147,880,491**, divided into 147,880,491 shares with a nominal value of PLN 1 per share.



April 2025

- **15 April – Annual General Meeting of BNP Paribas Bank Polska S.A.**

The AGM passed a resolution to pay a dividend for 2024 in the amount of PLN 1,162,340,659.26 i.e. PLN 7.86 per share. The dividend covers all of the Bank’s 147,880,491 outstanding shares.

Dividend record date: 22 April 2025, dividend payment date: 9 May 2025.

- **29 April – Entry in the National Court Register of amendments to the Articles of Association of BNP Paribas Bank Polska S.A.: increase of the Bank’s share capital to PLN 147,880,491** as a result of acquisition of series M shares and series N shares under Article 29a(2)(d) and Article 29b(2)(a) of the Articles of Association of BNP Paribas Bank Polska S.A.

May 2025

- **9 May – Minimum own funds and eligible liabilities requirement (MREL) set for BNP Paribas Bank Polska S.A.**

The MREL requirement for the Bank on a separate basis was set at 15.93% of the Total Risk Exposure Amount (TREA) and 5.91% of the Total Exposure Measure (TEM). The Bank was obliged to meet the requirement immediately upon receipt of the update. As at the date of receipt of the BFG update, the Bank met the MREL requirement set therein.



June 2025

- **2 June – Issue of Tier 2 bonds**

BNP Paribas S.A., Paris, accepted the offer to acquire the capital bonds referred to in Article 27a of the Act of 15 January 2015 on Bonds (the “Bonds”), presented by BNP Paribas Bank Polska S.A.

The total nominal value of the Bonds is EUR 160,000,000, and the nominal value of a single Bond is EUR 100,000. The maturity date of the Bonds is 6 June 2040.

The interest rate on the Bonds was set based on the compounded daily €STR rate plus a margin. The interest rate was determined on market terms.

The terms of the Bond issue provide for the possibility of early redemption by the Bank after 10 years from the issue date, subject to prior approval from the Polish Financial Supervision Authority.

On 11 August 2025, the Polish Financial Supervision Authority approved the classification of these capital Bonds as Tier 2 capital instruments.

The funds raised from the issue of the Bonds replaced funds originating from subordinated loans in the amounts of EUR 60,000,000, CHF 60,000,000, and EUR 40,000,000 (as previously disclosed by the Bank in current reports no. 24/2017 of 20 November 2017 and 76/2018 of 10 December 2018). The loans were subject to prudential amortisation and were repaid in September 2025.



September 2025

- **10 September – Fitch Ratings rating action** – change of the Bank’s Long-Term Issuer Default Rating (“IDR”) outlook from “Stable” to “Negative” and confirmation of the Long-Term IDR and Shareholder Support Rating (“SSR”) at “A+” and “a+” respectively.

The change in the Bank’s rating outlook follows revision of Poland’s local-currency Long-Term Issuer Default Rating outlook from “Stable” to “Negative.” The Bank’s ratings are capped at a level two notches above Poland’s sovereign rating (“A-/Negative”) due to the incorporation of country risk, which, in the Agency’s view, may limit the Bank’s ability to obtain support from its parent entity in the event of a crisis situation.

Full list of rating actions communicated by Fitch:

- Long-Term Issuer Default Rating (LT IDR) was confirmed as “A+”, outlook negative,
 - Short-Term Issuer Default Rating (ST IDR) was confirmed as “F1”,
 - National Long-Term Rating (Natl LT) was confirmed as “AAA(pol)”, outlook stable,
 - National Short-Term Rating (Natl ST) was confirmed as “F1+(pol)”,
 - Viability Rating (VR) was confirmed as “bbb-”,
 - Shareholder Support Rating (SSR) was confirmed as “a+”.
- **12 September – Request submitted by the Polish Financial Supervision Authority for the Financial Stability Committee to provide an opinion on determining the level of the Other Systemically Important Institution (O-SII) buffer** for BNP Paribas Bank Polska, whose appropriate level—according to the principles arising from the methodology established by the Polish Financial Supervision Authority —should be set at 0.25% of the total risk exposure amount.

The current O-SII buffer for the Bank is set at a level equivalent to 0.50% of the total risk exposure amount.



October 2025

• 8 October – Issue of Tier 2 Capital Bonds

BNP Paribas S.A., Paris, accepted the offer submitted by BNP Paribas Bank Polska S.A. to acquire capital bonds referred to in Article 27a of the Act of 15 January 2015 on Bonds (the “Bonds”).

The total nominal value of the Bonds is EUR 630,000,000, and the nominal value of a single Bond is EUR 100,000. The maturity date of the Bonds is 10 October 2040.

The interest rate on the Bonds was set on the basis of the compounded daily €STR rate plus a margin. The interest rate was determined on market terms.

The terms of the Bond issuance provide for the possibility of early redemption by the Bank after 10 years from the issue date, subject to prior approval from the Polish Financial Supervision Authority (“KNF”).

On 24 November 2025, the Bank received a KNF decision dated 21 November 2025 granting approval for the classification of the capital bonds with a total value of EUR 630,000,000, issued by the Bank on 10 October 2025, as Tier 2 capital instruments.

The Bank’s intention is for the funds raised from the issuance of the Bonds to replace funds obtained by the Bank from subordinated loans in the amounts of CHF 90,000,000 and PLN 2,300,000,000, as disclosed in current reports no. 25/2019 of 13 September 2019 and 38/2020 of 7 December 2020. The first of these loans was subject to prudential amortisation and, following KNF approval, was repaid in November 2025. The second loan, following KNF approval, was repaid in December 2025.

The Bank’s objective is to maintain the level of Tier 2 capital and improve the maturity structure of the instruments that comprise it.



October 2025

• 27 October – Fitch Rating rating action – upgrade of the Bank’s Viability Rating (VR) to “bbb” from “bbb-” and confirmation of the Long-Term Issuer Default Rating (LT IDR) as “A+”, outlook negative, and Shareholder Support Rating (SSR) as “a+”.

The upgrade of the Viability Rating (VR) is the result of a significant and lasting reduction in the legal risk associated with CHF mortgage loans, which no longer has a negative impact on the Bank’s risk profile and profitability assessment.

Full list of rating actions communicated by Fitch:

- Long-Term Issuer Default Rating (LT IDR) was confirmed as “A+”, outlook negative,
- Short-Term Issuer Default Rating (ST IDR) was confirmed as “F1”,
- National Long-Term Rating (Natl LT) was confirmed as “AAA(pol)”, outlook stable,
- National Short-Term Rating (Natl ST) was confirmed as “F1+(pol)”,
- Viability Rating (VR) was upgraded to “bbb”,
- Shareholder Support Rating (SSR) was confirmed as “a+”.

November 2025

• 27 November – Extraordinary General Meeting of BNP Paribas Bank Polska S.A.

Resolutions amending the Bank’s Articles of Association and approving the consolidated text.



December 2025

• 10 December –BNP Paribas Bank Polska S.A. Group’s Strategy 2026-2030

• 16 December – Information on the change in the share of total vote in BNP Paribas Bank Polska S.A. – as a result of the settlement of block trades concluded on 12 December 2025 in connection with the completion of the accelerated bookbuilding covering 9,214,025 shares of the Bank (“Settlement”), the share of BNP Paribas S.A. in the total number of votes at the Bank’s General Meeting decreased by approximately 6.23%.

As a result of the Settlement, on the date of notification, BNP Paribas S.A. directly holds 75,420,141 shares of the Bank, representing approximately 51.00% of the Bank’s share capital and in the total number of votes at the General Meeting, and together with its subsidiary BNP Paribas Fortis SA/NV holds a total of 110,910,367 shares of the Bank, representing approximately 75.00% of the Bank’s share capital and in the total number of votes at the General Meeting. This is consistent with the previously announced intention to increase the number of the Bank’s shares in free float to at least 25%.

Before the Settlement, BNP Paribas SA directly held 84,634,166 shares of the Bank, representing approximately 57.23% of the Bank’s share capital and the total number of votes at the General Meeting, and together with its subsidiary BNP Paribas Fortis SA/NV held a total of 120,124,392 shares of the Bank, representing approximately 81.23% of the Bank’s share capital and in the total number of votes at the General Meeting.

Furthermore, BNP Paribas SA reported that the above transactions were settled at a price of PLN 120 per share (resulting in a total transaction value of approximately PLN 1.1 billion / approximately EUR 261 million). The shares were offered through an accelerated bookbuilding process addressed exclusively to institutional investors. BNP Paribas S.A. has committed to a 180-day lock-up on its remaining shares in the Bank, with the possibility of waiver by the investment firms acting as intermediaries in the transaction.

Changes to the Supervisory Board and the Management Board of the Bank are described under Corporate governance, section Statutory bodies of the Bank.



Awards

January 2025

- **Top Employer title** – awarded for the 12th consecutive year, with a score of 95.93% in this year’s certification. This confirms that the Bank has adopted the right employer strategy and demonstrates genuine care for positive employee relations.
- In the *Rzeczpospolita* ranking “**Customer Satisfaction Ranking of Banks**,” the Bank ranked 4th, confirming the high level of customer satisfaction and the Bank’s strong focus on client comfort.
- The Bank’s Economic and Sectoral Analysis Department received the **LSEG StarMine Award** for the 3rd time in the last 5 years in the category “**Most Accurate Forecasters in Reuters Polls**” for the most accurate forecasts of the Polish economy for 2024. The Bank achieved the highest score in the market (4.17 points). This is the second consecutive year the Bank has taken 1st place in the ranking of economic forecasts for Poland.
- The Brokerage Office team secured **first place in all three *Parkiet* rankings** for the technical, investment, and dividend portfolios, confirming its ability to make effective investment decisions in a volatile and demanding market environment.
- The Bank won **third place in the OLX KNOW HOW 2025 competition** for the **#UnexpectedJobs** campaign – *Good decisions are often unexpected*. The competition recognised HR campaigns addressing socially important issues.
- **Józef Wancer**, Honorary Chairman of the Bank’s Supervisory Board, was awarded the **Officer’s Cross of the Order of Polonia Restituta by the President of Poland**. **Przemek Gdański**, President of the Bank’s Management Board, received the **Gold Cross of Merit** for outstanding achievements in fostering innovation and enhancing the competitiveness of the Polish banking sector.

March 2025

- **Global Finance**, an international magazine and financial-industry portal, recognised BNP Paribas Bank Polska as the **best bank in Poland for small and medium-sized enterprises**. The Bank retained the top position it earned last year.
- For the **fourth consecutive year**, the Bank received the **Ethical Company** title in the *Puls Biznesu* ranking. The competition highlights best-in-class business conduct. The jury awards companies for which an ethical code is not merely a branding element but a genuine standard of behaviour.
- In the **WealthBriefing European Awards**, BNP Paribas Wealth Management won in the category **Wealth Management Business in Central and Eastern Europe**. The panel particularly appreciated the Bank’s unique approach to customer relationships, professionalism, extensive experience in managing private and business wealth, expert knowledge, and the comprehensive support BNP Paribas provides at every stage of cooperation.
- At the European Agribusiness Financing Forum 2025, the Bank won 1st place in the category Leader of Domestic Agribusiness Financing.
- In the annual financial-sector summary published by **Home&Market**, the Bank was recognised in the categories “Credit Card” and “Private Banking.” These awards were granted for the best financial products available on the market.
- The Bank received awards in four categories of the **Institution of the Year** competition organised by the Moje Bankowanie portal, including two categories introduced in the 10th edition of the ranking. 21 Customer Centres in fifteen cities received individual distinctions and the title of **Best Bank Branch in Poland**. The Bank earned the title **Institution of the Year** in the categories “Security,” “Customer Voice,” “Best Online Banking,” and “Best Personal Banking – Branch Service.” The Bank has held the top position in the latter category since 2023.
- The Bank received **ISO 14001:2015** and **ISO 50001:2018** certifications. This means that the Bank’s Petrus headquarters and 10 Customer Centres comply with international standards for environmental and energy management. In the coming years, the Bank plans to implement these standards across all remaining branches.

April 2025

- In the 16th edition of the **Złoty Bankier** ranking, the Bank won in the “**Cash Loan**” category and received the **Cybersecurity Golden Shield**, a new award granted for exemplary standards in data protection and digital security. In the main ranking, which evaluates the quality of multichannel customer service, the Bank took **fourth place** (an improvement of one position compared with 2024).
- In the **Paperless Hero** competition, the Bank received the **Digital Transformation of the Decade** award. The initiative recognises leaders of digital change among **Autenti’s** clients. The Bank’s CEO, Przemek Gdański, received the title **Digital Evangelist**.
- **Magdalena Nowicka**, Vice-President of the Bank’s Management Board, was awarded the title **Innovator of the Year 2024** in the **Leaders of the Financial World** competition for implementing a comprehensive digital resilience strategy. In response to growing threats and regulatory pressure, the Bank conducted a detailed assessment of organisational resilience, covering IT architecture, SDLC processes, and cost management. As part of this strategy, the Bank effectively integrates cybersecurity, risk management, cost efficiency, and agile practices, strengthening protection and the ability to respond quickly to change.



May 2025

- The Bank received an award in the **SS&C Blue Prism Customer Excellence Awards 2025**, being recognised in the **Operational Ingenuity** category for the EMEA region. This category highlights implementations that demonstrate exceptional operational creativity in the field of intelligent automation. The Bank submitted its seven-year-long concept for developing robotics, managing a robot farm (the Master & Workers model), monitoring, collecting automation ideas, building team competences, as well as its most notable implementations and achieved results.
- The Bank once again became a finalist in the **PSIK Awards 2025** in the **Financing Bank of the Year** category. For many years, the competition has promoted the highest professional standards in the industry and recognised institutions that support the growth of Polish companies.
- For the **fifth consecutive year**, the Bank was included on the **Diversity IN Check** list, which awards employers most advanced in managing diversity and inclusion in Poland. The list, created by the **Responsible Business Forum**, the coordinator of the Diversity Charter in Poland, reflects the maturity of organisations in building inclusive work environments. This year, 75 employers qualified, of which 15, including BNP Paribas Bank Polska, achieved an excellent score exceeding 80% of the possible points.
- For its efforts to promote equal opportunities for people of different genders in business and society, the Bank received a nomination in the **Gender** category of the **Polish Diversity Awards 2025**. The awards and nominations were granted by the editorial team of *My Company Polska*.



June 2025

- BNP Paribas Wealth Management was recognised for the fifth consecutive year as the best private banking provider in the international **Global Private Banking Innovation Awards**. The jury emphasised that BNP Paribas Wealth Management is a pioneer in delivering top-quality, tailor-made services and solutions. It is distinguished by its individualised customer approach as well as strategic wealth management and growth.
- The Bank once again became the leader in the **ESG Stars** category in the prestigious “Banking Stars” ranking by *Dziennik Gazeta Prawna* and Boston Consulting Group.
- The Bank was awarded **3rd place** in the **Climate-Friendly Banks 2025** category in the inaugural edition of the **Ranking of Banks Supporting the Transformation of the Polish Economy**, organised by *Miesięcznik Finansowy Bank*. The ranking highlights banks that not only declare climate-positive actions but actively engage in concrete projects such as financing renewable energy, issuing green bonds, and providing sustainability-linked loans.
- As one of the first financial institutions in Poland, the Bank received the **“Neurodiversity-Friendly Workplace”** certificate from the **asperIT Foundation**. This distinction confirms the Bank’s readiness to hire neurodiverse persons in 2025–2027.
- The **Compliance Institute** awarded the Bank the **Compliance Awards 2024** in the **Compliance Ideal** category for its robotisation and automation of compliance processes.
- At the **Employer Branding Excellence Awards 2025**, the Bank received the main award in the “Brand Film” category for the #UnexpectedJobs campaign – *Good decisions are often unexpected* – and an honourable mention in the “Internal Campaign” category for the *Taki feedback, że aż chce MiSię* campaign.



July 2025

- The Bank won three categories in this year’s **Global Transaction Banking Innovation Awards 2025**, organised by the prestigious publication *The Digital Banker*. The Bank’s SME and Corporate Banking division was recognised for its innovative approach to foreign exchange services, trade finance, and the use of technology in payments.

September 2025

- The Bank received **two awards** in the **POLSIF Awards** competition in the categories **Best Sustainable Financing** and **Best Sustainability-Linked (SL) Financing** for the projects *Park Szczecin VI Logistics Centre* and *ESG-Linked Factoring*. The competition is organised by the Sustainable Investment Forum Poland and is the only award in the country dedicated entirely to sustainable finance.
- The Bank’s campaign **“Good decisions are often unexpected #UNEXPECTEDJOBS”** received three awards in the international **EBMAwards**, which recognise excellence in employer branding. In cooperation with the agencies Be About | Hybrid Agency, the Bank received three awards granted by the Employer Brand Management Awards and *Communicate Magazine*: – Gold – Best Employer Brand Management from the financial sector, Bronze – Best integration of the employer brand in communication strategy, Bronze – Best communication of the employer brand to the external audience.
- The **Moje Konto Premium** account ranked **first** in the **Bankier.pl** ranking of the best premium accounts.



October 2025

- The Bank’s 2024 Annual Report was awarded for the seventh time by the Institute of Accounting and Taxes in the prestigious “The Best Annual Report” competition. In the 20th anniversary edition, the Bank received the **special award “The Best of The Best,”** recognizing the report’s high standards, reliability, and exemplary quality.
- The Bank was named a winner of the **Forrester’s Security & Risk Enterprise Leadership Award 2025**, an honour granted to organisations that excel in combining innovation, transparency, and effective risk management. Forrester experts highlighted the Bank’s **integrated security program, its collaborative culture built around “security champions,”** and its strategic approach to data protection and incident management.
- In the second edition of the Forbes **Ranking of Banks for Affluent Clients**, the Bank once again placed **third**, achieving a score of 87.88%.
- The Bank ranked **4th** in the Forbes **“Business-Friendly Bank” Ranking**. Across the evaluated criteria—service quality, client acquisition, remote contact channels, and branch characteristics—the Bank earned 90% of the possible points.
- In the **Newsweek Friendly Bank 2025 Ranking**, the Bank achieved 5th place in the Remote Banking module (an improvement of five positions compared with the previous year). In the Bank for Everyman module, the Bank ranked 7th.



November 2025

- The Bank’s **Fishing For Data #WPŁYWOWI** campaign received one of the most prestigious marketing awards in Poland – the **Silver Effie Poland** in the ESG category. Another Bank initiative, “Good decisions are often unexpected” **#UnexpectedJobs**, was nominated for an Effie Poland award in the PR & Employer Branding category.
- During the **2025 Diversity Charter Gala**, organised by the Responsible Business Forum, the Women on Boards Awards were presented. These distinctions honour leaders who inspire meaningful change in the business environment. Among the award winners were two leaders from our organisation: **Lucyna Stańczak-Wuczyńska, Chairperson of the Supervisory Board, and Bożena Leśniewska, Member of the Supervisory Board**. Both were recognised for their exceptional contributions to promoting inclusion, inspiring others, and consistently paving the way for women in the corporate sector and leadership roles.
- In the 8th edition of **“The Best of Moto”** plebiscite by gazeta.pl, the mamGO platform and flexible car-financing options – including Arval Flex – received a distinction in the Financial Product of the Year category.



December 2025

- The **ESG Angels 2025** ranking by *My Company Polska* showcasing 25 leaders of sustainable business recognised **Lucyna Stańczak-Wuczyńska, Chairperson and Independent Member of the Bank’s Supervisory Board**.



Bank in its environment

- 20 Macroeconomic conditions
- 22 Results of the banking sector
- 24 Stock market and investments

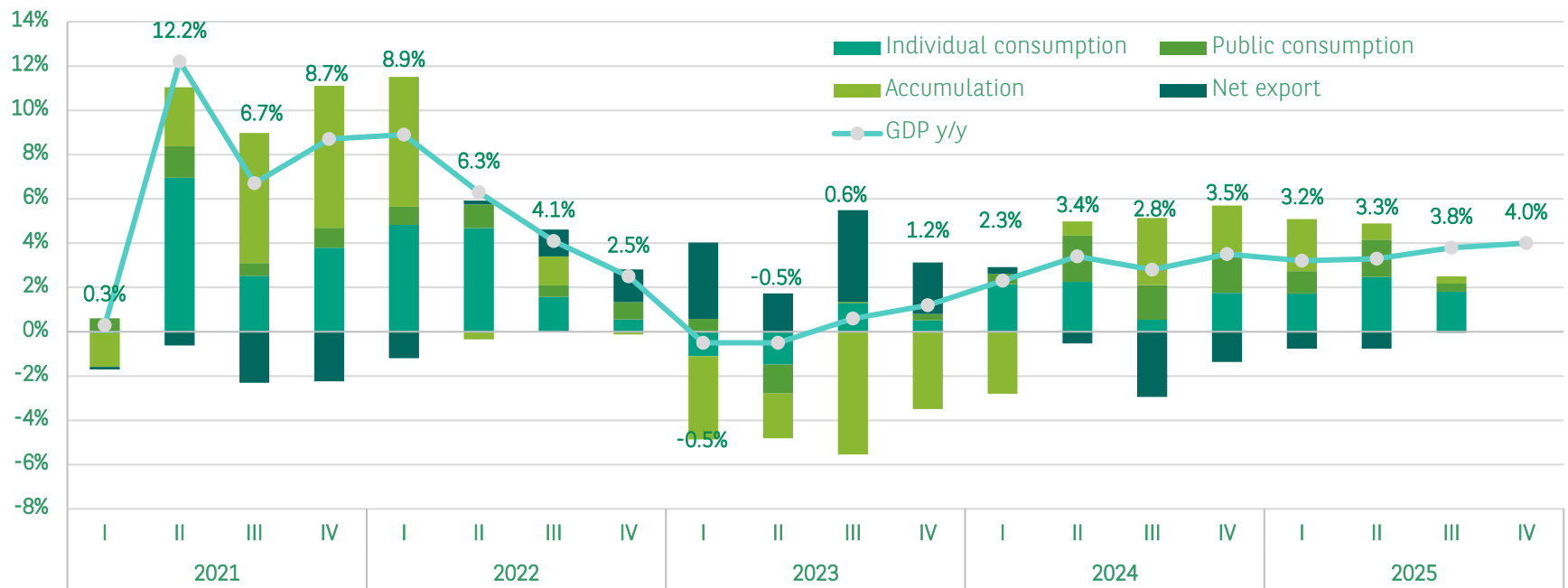


Macroeconomic conditions

GDP

In 2025, Poland’s Gross Domestic Product increased by 3.6% according to preliminary data. The main driver of economic activity was domestic demand, which grew by 4.0%, including a 3.7% increase in household consumption expenditure and a 4.2% rise in gross fixed capital formation. As a result, the contribution of foreign trade to GDP remained negative, although export data indicate some revival in foreign trade sales. Estimates published by Statistics Poland (GUS) show that in the fourth quarter of 2025 alone GDP increased by 4.0% year on year in unadjusted terms (and by 1.0% quarter on quarter and 3.6% year on year after seasonal adjustment). The acceleration of economic growth in the second half of 2025 was likely driven to a large extent by investments – both in the public sector and among enterprises. However, detailed data on the structure of national accounts for the last quarter of the year will be published by GUS only on 2 March.

Chart 5. GDP growth



Economic activity

According to data for October–December, economic activity in Poland remained relatively strong. Industrial production increased by 3.2% year on year (compared with 3.8% year on year in Q3), while construction and assembly output rose by 2.9% year on year (following a 2.0% decline in July–September). Real retail sales grew by 4.6% year on year (versus 4.9% year on year in the previous quarter). Household consumption was supported by stable wage growth. In October–December, the average nominal wage in the enterprise sector rose by 7.5% year on year. Adjusted for inflation, wages in firms employing more than nine people increased in real terms by approximately 4.9% year on year.

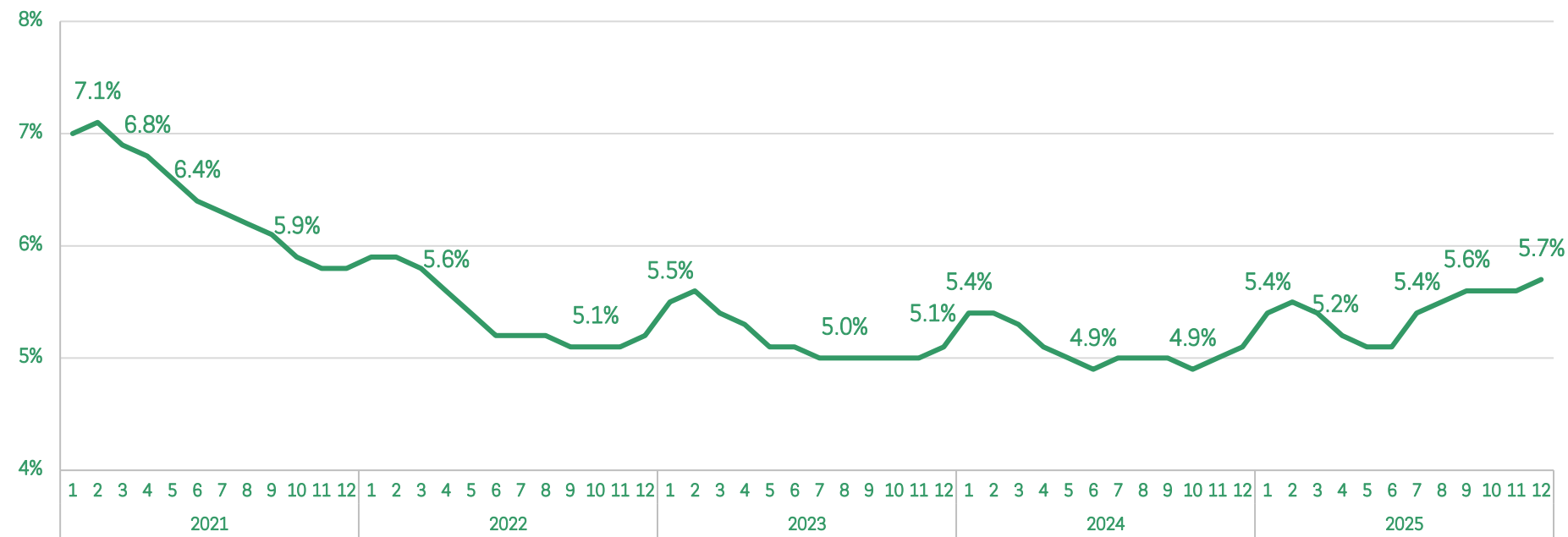
The registered unemployment rate rose slightly compared with the beginning of the year and stands at 5.7%, while employment in the enterprise sector declined by around 0.7% year on year. Leading economic indicators suggest that

further economic recovery will be driven mainly by industries benefiting from the inflow of new capital in the form of funds from the National Recovery Plan. The improvement in manufacturing and exports should also be supported by faster growing foreign demand, particularly in Germany.

Inflation

In the fourth quarter of 2025, CPI inflation in Poland continued to decelerate. In October–December, consumer prices increased on average by 2.6% year on year, compared with 3.0% year on year in July–September. Excluding food and energy prices, inflation in Q4 amounted to 2.8% year on year, i.e. 0.4 percentage points lower than in Q3 2025 (3.2% year on year). In the coming months, core inflation is expected to continue gradually easing, supported by the appreciation of the zloty and slowing wage growth. Labour costs are likely to rise at a slower pace in the near term, as indicated, among other things, by business surveys. Energy prices will also play an important role in shaping CPI inflation in 2026. We forecast that CPI inflation this year will average 2.1% year on year and will remain below the National Bank of Poland’s 2.5% inflation target for much of the year.

Chart 6. Registered unemployment rate

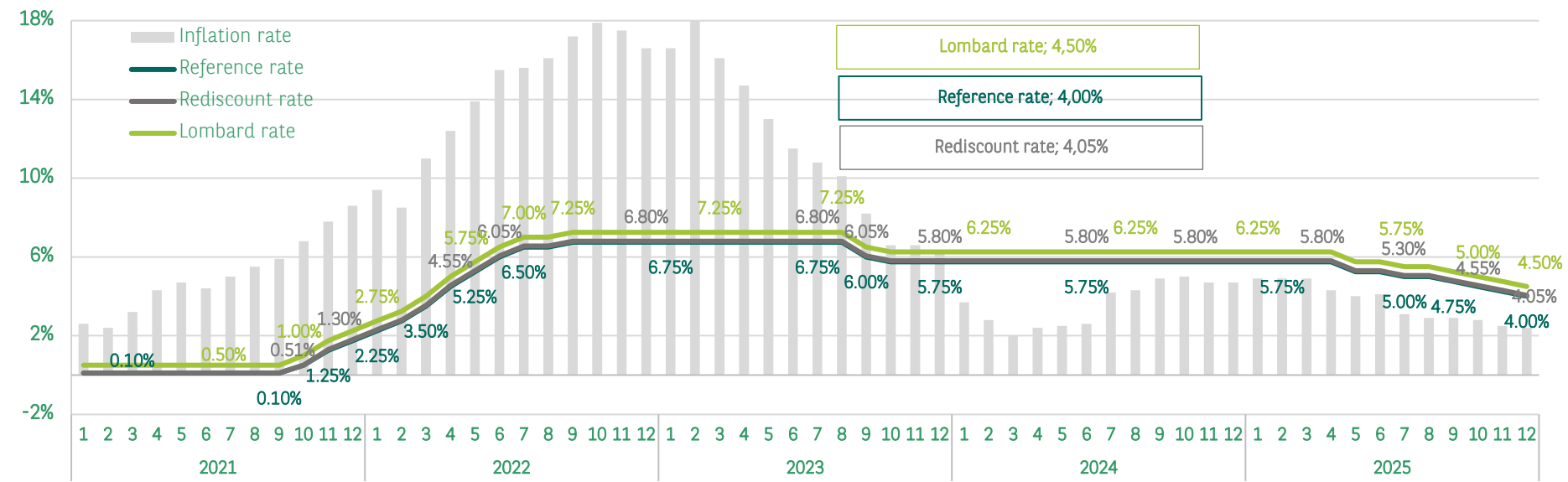




Monetary policy

In December 2025, the Monetary Policy Council (RPP) decided on a further adjustment of the reference rate, lowering it by 25 basis points to 4.00%. In 2025, the RPP cut interest rates six times, by a total of 175 basis points. We believe that the monetary policy easing cycle that began last year in Poland has not yet come to an end. This was explicitly stated by NBP Governor Adam Glapiński, who noted during his January and February press conferences that there is still room for further interest rate cuts in Poland. The outlook for inflation – which, according to the head of the central bank, has declined in a lasting manner – supports the case for continued downward rate adjustments. In this context, we expect the reference rate to be reduced to 3.50% this year, although we see some risk of a slightly deeper adjustment (75 basis points) in the coming months. At present, the market is pricing in a decline in the main policy rate to 3.25–3.50% this year.

Chart 7. Inflation and interest rates

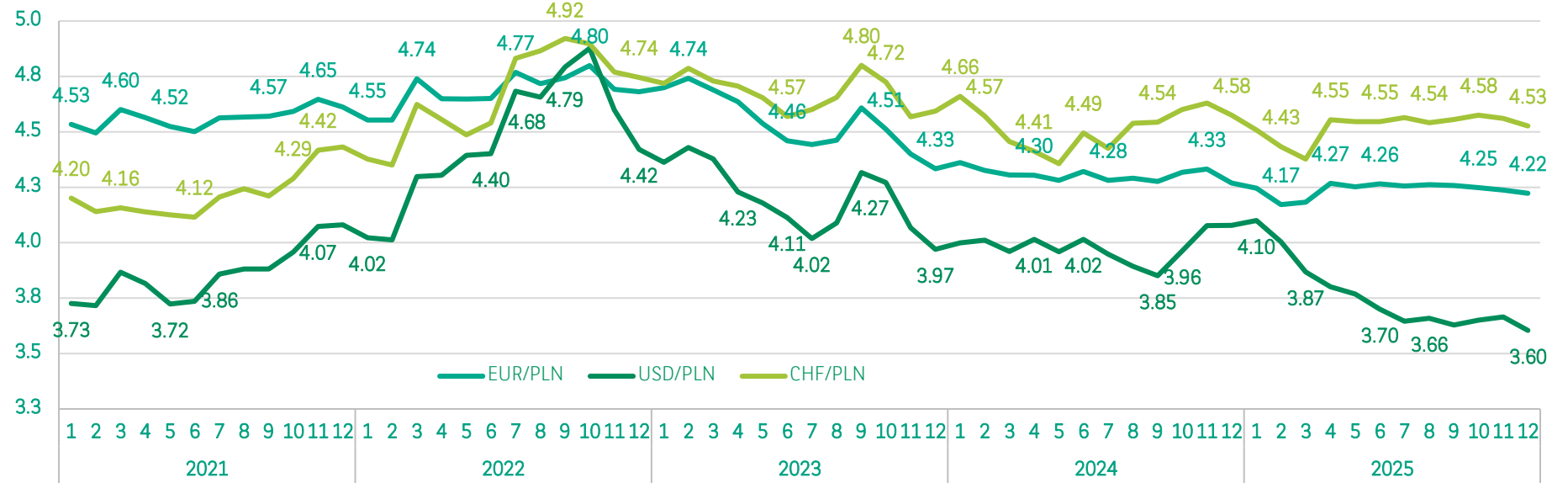


Bond market

In the final months of 2025, the yield on Poland’s 10-year government bonds gradually declined, reaching around 5.0% in December compared with approximately 6% recorded at the beginning of the year. This decrease was driven mainly by improving macroeconomic conditions, including slowing inflation alongside stable economic growth. Additionally, the National Bank of Poland was in a monetary policy easing cycle, lowering interest rates, which also translated into reduced government financing costs. However, the fiscal premium embedded in bond yields remains elevated. The significant budget deficit and the resulting substantial borrowing needs – and thus the large supply of government bonds on the market – contribute to higher sovereign debt yields relative to swap rates.

FX market

Chart 8. PLN exchange rate (monthly average)



In 2025, the zloty remained very stable against the euro, trading within a very narrow range of 4.20–4.25 for most of the year. The stability of the EURPLN exchange rate at low levels was supported by the structure of the balance of payments (a small current account deficit and a significant inflow of foreign capital into the Polish financial market), accelerating economic growth in Poland, and relatively high real interest rates (with inflation falling faster than nominal interest rates). Due to the weakening of the US dollar on global markets, the zloty appreciated strongly against the U.S. currency. The USDPLN exchange rate fell from around 4.00 in the first quarter to below 3.60 at the end of 2025.



Results of the banking sector

Key lines of banks’ profit and loss account

In 2025, the net profit of the banking sector in Poland, according to preliminary data from the National Bank of Poland (NBP), amounted to PLN 48.7 billion and was higher by PLN 8.6 billion, i.e. by 21.5%, compared with 2024.

The increase in the sector’s net profit was driven primarily by several factors: growth in net interest income, an almost twofold increase in other net income (from banking activities), and an improvement in the negative result on impairment of financial assets and total provisions. A positive contribution came with a relative improvement in other income, and a modest improvement in net fee and commission income. The main negative factor affecting year-on-year growth in the sector’s net profit was an increase in total operating expenses (including depreciation, amortisation and the bank tax), accompanied by a much smaller nominal increase in income tax expense (whose growth rate was much lower than the growth rate of profit before tax).

Net interest income increased by PLN 3.6 billion year on year, i.e. by 3.4%, although its growth rate gradually slowed throughout the year. This was driven by interest rate cuts by the Monetary Policy Council, which lowered NBP rates by a total of 1.75 percentage points in 2025, ultimately bringing the average NBP reference rate down by 0.65 percentage points year on year. The most recent cuts, implemented in Q4 2025 (a total of 0.75 percentage points), have not yet been fully reflected in the slowdown of net interest income growth year on year due to the delayed repricing of the variable-rate portion of the loan portfolio. Moreover, the cumulative NBP rate cuts in 2025 had a smaller-than-expected impact on slowing net interest income growth. This was mainly due to the sector’s persistently high excess liquidity (limiting price competition for deposits) and the high share of fixed-rate assets on banks’ balance sheets – one of the highest in recent years. Particularly important were the high share of fixed-rate government bonds and the growing share of mortgage loans with periodically fixed interest rates.

The upward trend in net interest income was also supported by a clear acceleration of lending activity in 2025 in the non-financial customer segment, especially in high-margin consumer loans for individuals and in loans to non-financial corporates, while volumes of generally less profitable loans to central government institutions remained stable. In addition to business factors, net interest income growth was partly due to a low base in 2024, when some banks recognised the cost of the second edition of the mortgage loan holiday programme in interest income (the final sector-wide cost did not exceed PLN 1.1 billion and was significantly lower than initially estimated and booked by banks in H1 2024).

The nearly twofold increase in other net income (from banking activities), by PLN 4.2 billion year on year, resulted mainly from a decline in legal risk provisions related to foreign currency mortgage loans (reported in this item by some banks).

Banks’ operating costs (including depreciation, amortisation and the bank tax) increased by PLN 4.2 billion year on year, i.e. by 7.3%, driven mainly by comparable increases in personnel costs (up PLN 2.1 billion, or 7.6% year on year) and general administrative expenses (up PLN 1.9 billion, or 8.2% year on year). Depreciation costs increased at a much slower pace (2.5%) and by a marginal amount (just over PLN 0.1 billion). The fastest growth in general administrative costs was driven by a sharp increase in regulatory costs, resulting from the reinstatement – starting in Q1 2025 – of mandatory contributions to the Bank Guarantee Fund (BFG), amounting to PLN 893 million for the sector, and an increase in the

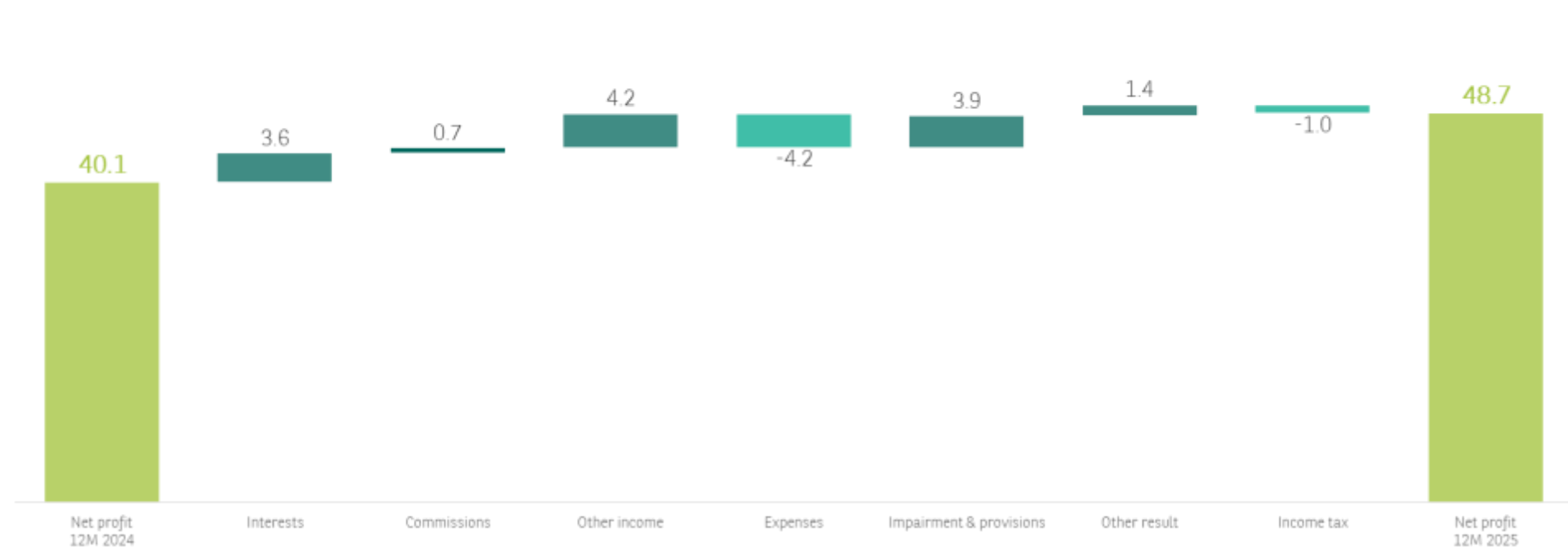
resolution fund contribution by PLN 250 million to PLN 1,813 million. The continued, though moderating, increase in personnel costs was linked to ongoing wage increases (largely inflation-indexed) and, in some banks, higher provisions for annual bonuses due to improved financial performance.

The charge to the banking sector’s results arising from the negative balance of impairment charges on financial assets and total provisions decreased markedly year on year (an improvement of as much as PLN 3.9 billion, i.e. 20.2%). This was driven primarily by an improvement – significant in value terms in recent years – in the negative balance of provisions by PLN 3.5 billion, or 26.2%, resulting in particular from a decline in provisions for legal risk related to foreign currency mortgage loans (reported in this item by some banks). The negative result on impairment charges for financial assets improved by PLN 0.4 billion year on year, or 7.0%, accompanied by a clear improvement in the quality of banks’ receivables from non-financial sector customers, as measured by the falling NPL ratio.

The sharp year-on-year improvement in other income – which had been strongly negative in 2024 – was driven by a strong improvement in the negative net allowances for non-financial assets. It was helped to a lesser extent by improvement (of over PLN 0.1 billion year on year) in still prevailing losses on modifications (which had been largely understated in 2024 due to banks recognising part of the cost of the mortgage loan holiday programme in this category).

The growth rate of income tax (by PLN 1.0 billion) was less than a half of the growth rate of profit before tax. This was partly due to a one-off positive effect from the revaluation of deferred tax assets and liabilities in Q4 2025, following an increase in corporate income tax rates applicable to banks in the coming years (as a specific category of legal entities).

Chart 9. Key lines of bank’s profit and loss account (PLN billion)



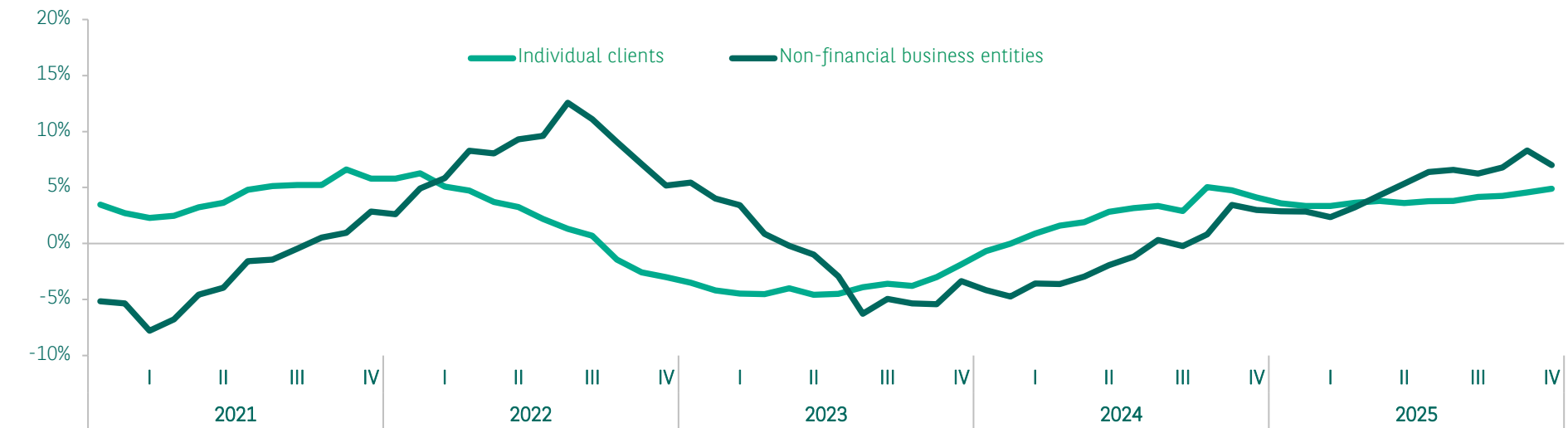


Key lines of banks' balance sheet

In 2025, solid economic growth and declining interest rates supported demand for bank credit across the main market segments. According to NBP data (MONREP methodology), the volume of loans to non-bank customers amounted to PLN 1,557 billion at the end of 2025, an increase of PLN 81.3 billion, or 5.5%, compared with the end of 2024 (in 2024, the volume of loans to non-bank customers increased by PLN 73.8 billion, or 5.3%).

Loan volumes increased across all four major customer segments, with the strongest growth recorded in loans to non-financial corporates – up by nearly PLN 35.2 billion, or 7.1% year on year, to PLN 532.6 billion. The volume of loans to private individuals also increased in 2025, reaching PLN 742.8 billion – up by PLN 34.7 billion, or 4.9%. Loan volumes for central and local government institutions and for non-bank financial institutions also grew last year, by PLN 7 billion (6.2% year on year) and PLN 4.5 billion (2.9% year on year), respectively. In both of these segments, however, loan growth was slower than in 2024, both in nominal and percentage terms.

Chart 10. Loans to non-financial Customers (year on year change)

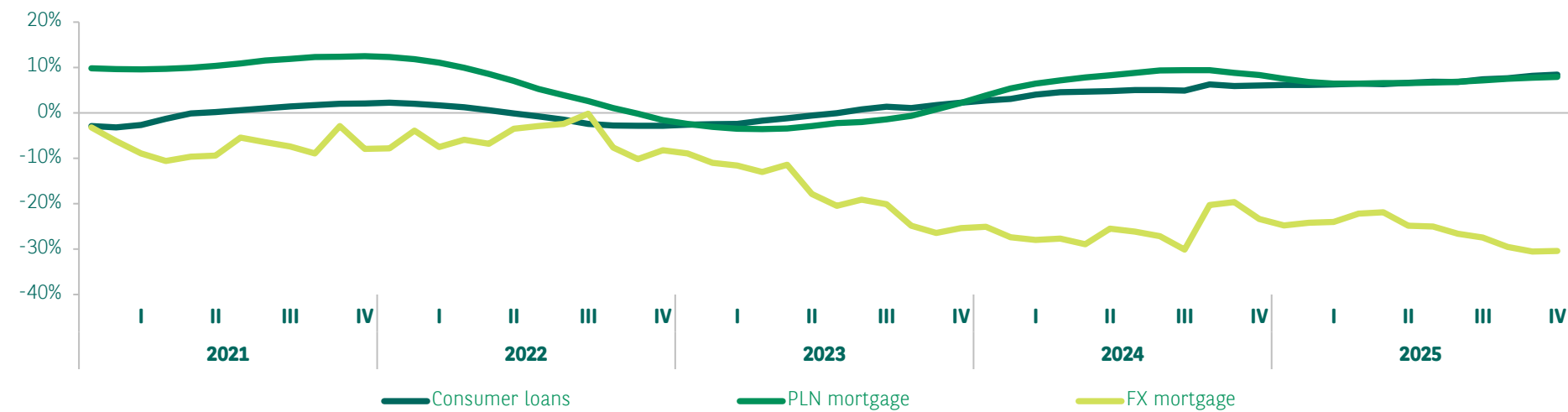


Source: NBP

The strong growth in loans to non-financial corporates was driven by rapidly increasing demand from non-financial enterprises, supported by accelerating economic activity and the beginning of a new investment cycle in the corporate sector. The volume of these loans increased in 2025 by nearly PLN 36.5 billion, or 9.0% year on year, reaching PLN 442.9 billion (compared with an increase of PLN 20.5 billion, or 5.3%, in 2024). Within this total, working capital loans grew by 7.2% in 2025, while investment loans rose by 10.1%.

Loan volumes for non-commercial institutions and individual farmers also increased last year, although only slightly in nominal terms – by PLN 436 million (5.2%) and PLN 501 million (1.5% year on year), respectively. In contrast, the volume of loans to sole proprietors continued to decline, falling by PLN 2.2 billion (4.5% year on year) to PLN 47.1 billion at the end of 2025.

Chart 11. Loans to retail Customers (year on year change)



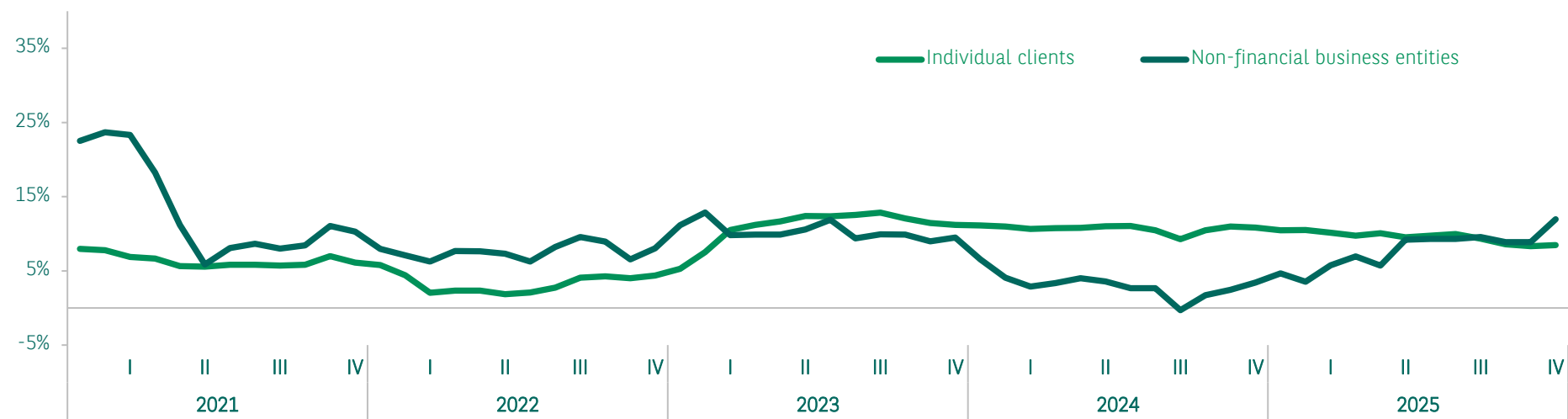
Source: NBP

The volume of loans to retail customers increased in 2025 by PLN 34.7 billion, or 4.9%, reaching PLN 742.8 billion – a faster pace than in 2024, when it grew by PLN 27.9 billion, or 4.1%. Last year's acceleration was driven primarily by stronger growth in consumer loan volumes, which rose by PLN 17.6 billion, or 8.4%, to PLN 226.8 billion. Demand for consumer credit was supported by solid household income growth, declining interest rates, and a shift in the structure of household spending – with a significant increase in the share of durable consumer goods, which are more often financed with credit than basic goods or services. According to BIK data available through November 2025, cash loans grew particularly rapidly – by 10.6% year on year – and their share in total consumer loan volumes approached 82%. Instalment loans increased by only 3.6% year on year in November, while credit card debt rose by 1%.

In nominal terms, the volume of PLN-denominated mortgage loans also increased more strongly in 2025 than in 2024 – by PLN 34.7 billion compared with PLN 33.8 billion – reaching PLN 474.1 billion. However, in percentage terms, last year's growth was slightly weaker than in 2024 (7.9% vs. 8.3%). Meanwhile, the volume of foreign currency mortgage loans declined in 2025 by roughly the same amount as in 2024 – by PLN 17.7–17.8 billion – falling to PLN 40.6 billion. If this pace of decline continues in the coming years, foreign currency mortgage loans will disappear entirely from banks' balance sheets by mid-2028.



Chart 12. Deposits of non-financial Customers (year on year change)



Source: NBP

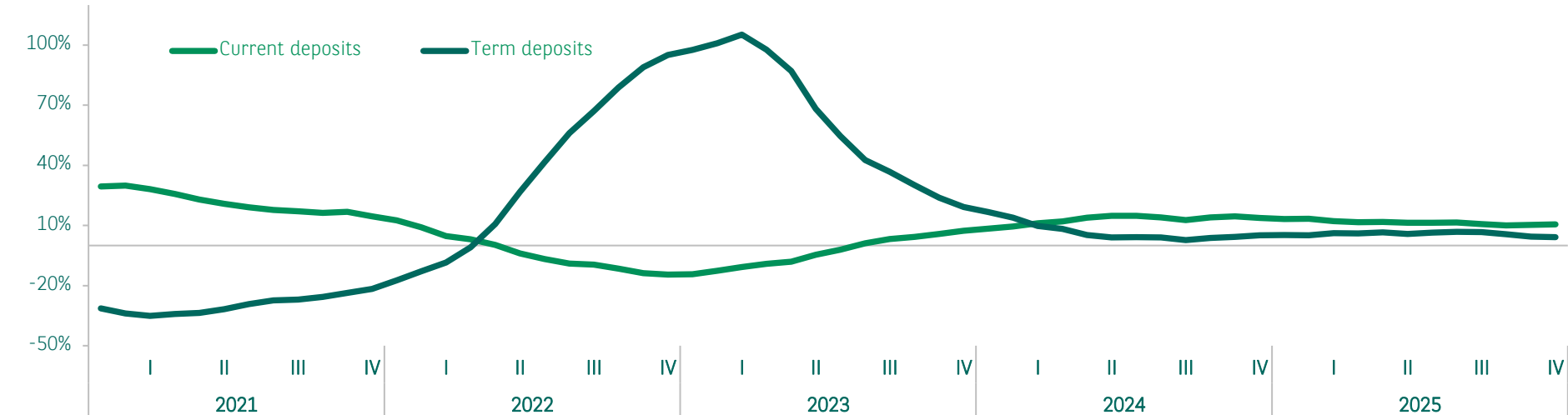
The volume of deposits from non-bank customers amounted to PLN 2,435 billion at the end of 2025 and increased by nearly PLN 211 billion, or 9.5%, compared with the end of 2024. Although in percentage terms deposits grew more slowly than in 2024 (10.0%), in nominal terms the increase was larger (in 2024, deposits from non-bank customers rose by just under PLN 202 billion). The persistently higher growth of deposit volumes compared with loan volumes in recent years reflects the rising net borrowing needs of central government institutions and the increase in net foreign assets (capital inflows from abroad, including EU funds).

Last year's increase in deposits from non-bank customers was driven primarily by two segments: private individuals (up by nearly PLN 103 billion, or 8.5% year on year) and non-financial corporates (up by more than PLN 83 billion, or 12.0% year on year). Within the latter, the strongest contribution came from deposits of non-financial enterprises, whose volume rose by PLN 75.5 billion, or 14.4% year on year.

Deposits of central and local government institutions increased in 2025 by nearly PLN 22 billion (8.8% year on year), while deposits of non-bank financial institutions grew by PLN 3.2 billion (4.3% year on year).

The strongest driver of last year's growth in household deposits was current accounts, whose volume increased by nearly PLN 86 billion, or 10.6% year on year. Term deposits grew by just under PLN 17 billion, or 4.2% year on year. The monetary policy easing cycle that began in May 2025, and the resulting decline in term deposit rates, reduced the attractiveness of term deposits. Their share in total household deposits fell to 31.5% at the end of 2025, compared with 32.8% at the end of 2024.

Chart 13. Deposits of retail Customers (year on year change)



Source: NBP

Stock market and investments

In 2025, the WIG index covering all companies listed on the Warsaw Stock Exchange (WSE) reached its highest level in history in December. After declines in H2 2024, the first three months of 2025 brought an increase of more than 20% in performance. In April, the market experienced a V-shaped correction of over 15% from end-March levels. However, still in April, the WIG rebounded to levels higher than those recorded before the correction. The following months saw a steady upward trend, interrupted only by short periods of pullback, none of which exceeded 8–9%. Ultimately, the WIG index gained more than 47% over the year, ending 2025 at historic highs around 117,000 points. Across the twelve months of 2025, returns varied across company segments, although the dispersion was smaller than in previous periods. Between 30 December 2024 and 30 December 2025, all four major WSE indices recorded strong positive returns. The best performers were the WIG (broad market) and WIG20 (largest companies), each gaining more than 45%. The weakest performer was the sWIG80 (smallest companies), which nevertheless rose by 25.4%.

The performance of the WSE indices was broadly aligned with global equity markets, although ultimately the former fared better. For example, the U.S. S&P 500 delivered a 16.4% return in 2025, while Germany's DAX gained 23.0%. Among major European benchmarks, France's CAC40 performed relatively weaker, gaining 10.4% over the same period.



Table 3. WSE main index performance

Index	31.12.2025	31.12.2024	31.12.2023	change 2025 vs. 2024	change 2024 vs. 2023
WIG	117,240	79,577	78,460	47.3%	1.4%
WIG20	3,184	2,192	2,343	45.3%	(6.4%)
mWIG40	8,182	6,122	5,785	33.6%	5.8%
sWIG80	29,590	23,595	22,904	25.4%	3.0%

Source: Bloomberg

Several factors drove the performance of the Warsaw Stock Exchange in 2025, including:

- persisting geopolitical risks in the region due to the ongoing war in Ukraine and uncertainty regarding potential scenarios for its conclusion;
- macroeconomic data that remained slightly weaker than expected, including PMI leading indicators, which led to downward revisions of GDP growth forecasts; on the other hand, expectations grew regarding the disbursement of EU funds, including those from the National Recovery Plan;
- market expectations regarding the interest-rate paths of the Fed and the ECB, amid differing inflation conditions and macroeconomic data across regions;
- expectations concerning the monetary policy stance of the Monetary Policy Council (RPP) and comments made by its members;
- capital inflows into the domestic equity market, supported by lower risk aversion, depreciation of the U.S. dollar, and rotation of funds from the United States to other regions in response to U.S. trade policy, as well as announcements of large investment programmes in Europe (infrastructure, defence);
- capital inflows into the bond market, supported by improving performance of fixed-income funds and expectations of interest rate cuts by the RPP;
- low valuations of domestic companies relative to emerging and developed markets, combined with a strong improvement in corporate earnings and increased investor interest following the successful IPOs of Diagnostyka and Arlen;
- uncertainty surrounding the outcome of Poland’s presidential election and concerns about a potential political deadlock between the president and the government.

The year 2025 brought a downward trend in Polish government bond yields, with the largest declines occurring in the first months of the year. Ultimately, yields on 10-year Polish government bonds ended 2025 at around 5.15%, compared with approximately 5.90% at the beginning of January. Volatility, however, was substantial. In just the first days of April, yields fell from around 5.75% to 5.20%. This was driven partly by capital inflows into Europe amid uncertainty surrounding U.S.

trade policy and the dovish stance of the European Central Bank. At the same time, this coincided with a significant shift in the RPP’s tone, from hawkish to dovish, regarding future interest rate cuts. After reaching 5.15% in April, yields on 10-year Polish government bonds rose again over the next two months toward 5.65%. This reflected global factors – notably the postponement of expected Fed rate cuts – and domestic factors, including a reassessment of how much monetary easing the RPP might deliver in 2025 and concerns about the scale of future budget deficits. In the second half of the year, yields gradually returned toward 5.15%, supported by subsequent interest rate cuts by the RPP. At the end of the reporting period, the reference rate stood at 4.00%.

Table 4. Number of companies, market capitalisation and turnover on WSE

	31.12.2025	31.12.2024	31.12.2023	change 2025 vs. 2024	change 2024 vs. 2023
Number of companies	399	411	413	(2.9%)	(0.5%)
Capitalisation of domestic companies (PLN million)	1,122,897	731,906	760,213	53.4%	(3.7%)
Equity turnover value (PLN million)	491,899	344,757	282,061	42.7%	22.2%
Futures turnover volume (thousand)	12,214	13,367	14,418	(8.6%)	(7.3%)

Source: WSE

In 2025, three companies were newly listed on the WSE Main Market, including one transferred from the NewConnect market, while 15 companies were delisted. On the NewConnect organised market, seven issuers were newly listed over the 12-month period, while ten were delisted. On the Catalyst bond market, a total of 847 bond series were listed, and the value of outstanding issues exceeded PLN 1,717 billion.



Strategy and outlook

- 27 GObeyond 2022-2025
- 30 Accelerate 2030
- 32 Outlook



GObeyond 2022-2025 business strategy

The main objective of the GObeyond Strategy for 2022–2025, adopted by the Bank’s Management Board and Supervisory Board in March 2022, was the dynamic development of the Bank as an efficient institution with engaged employees and satisfied Customers, while simultaneously positioning itself as a leader in the area of sustainable development. After several years of multi-stage scale-building through acquisitions, the GObeyond Strategy focused on organic growth, while maintaining a responsible approach to risk management.

The key targets of the GObeyond Strategy through 2025 included:

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

The strategic directions set out in the GObeyond Strategy were built on solid foundations and on the Bank’s sustainable and diversified business model. The Strategy was developed internally by a broad group of employees representing all key areas of the Bank, as well as representatives of its subsidiaries.

Pillars of the GObeyond Strategy

Pillar UP

The GObeyond Strategy was a growth strategy aimed at increasing the number of Customers served, strengthening market position, and growing revenues.

Retail Banking and Personal Finance

Achieving high Customer satisfaction, enabling the Bank to increase the number of Customers (by 0.5 million to 4.5 million) through innovative products (including those beyond traditional banking), personalised communication, and broad access to the Bank’s offering through remote channels.

SME, Corporate and CIB Banking

Strengthening the Bank’s position among international Customers and large domestic corporates (including supporting their international expansion). The goal was to increase the base of active Customers served through digital solutions. A key objective was the deep optimisation and shortening of the credit decision process.

Pillar POSITIVE

The Bank aims to be a leader in sustainable finance by expanding its product and service offering across all business lines. It consistently pursues its own climate neutrality and supports its Customers in doing the same. Relationships with Customers are guided by responsibility, accessibility, transparency and ethics. Actions addressed to local communities, as well as engagement in education and public debate, contribute to strengthening the Bank’s brand

Pillar STRONGER

The Bank places strong emphasis on improving internal processes, transforming the IT area using state-of-the-art technologies, and accelerating the implementation of new solutions. Planned investments in this area were set at PLN 1.5 billion by 2025. Fast and efficient scalability was intended to form the foundation of a modern digital Bank. Key goals included: supporting business development through advanced analytical tools; maintaining a safe and optimal capital and liquidity position; and initiating dividend payments during the strategy period.

Pillar TOGETHER

The Bank believes that engaged and satisfied employees are the foundation of high Customer satisfaction. The organisational culture – supporting employee development, activity and creativity – encourages bold decision-making. In 2022, the Bank began operating under the Agile@Scale model. Key initiatives included ensuring work-life balance, supporting mental health, promoting the development of women, and fostering diversity.

Implementation of the strategy in 2025

According to NBP data, the assets of the banking sector increased by 9.6% year on year at the end of 2025 (to PLN 3,634 billion), accompanied by a 13.0% rise in equity (to PLN 322 billion) and an 8.3% year on year increase in deposits from the non-financial sector (to PLN 2,104 billion). At the same time, the volume of loans to the non-financial sector on banks’ balance sheets grew by 6.1% year on year (to PLN 1,267 billion). On the one hand, the sector continues to operate with record-high excess liquidity (approaching 60%), due to conditions and policy actions during and after the pandemic, as well as high exposure to public debt and a relatively low degree to which the economy is financed by the Polish banking sector compared with GDP, especially in relation to EU peers. On the other hand, this represents a solid potential for financing business growth in the coming periods.

Despite the continuation of the monetary policy easing cycle, the relatively elevated level of interest rates – combined with ongoing optimisation efforts within financial institutions – enabled the sector to generate a record net profit in 2025 (PLN 48.7 billion, +21.5% year on year, according to NBP data). The sector continued to face negative pressures from legal and regulatory burdens, such as the tax on certain financial institutions, the cost of provisions related to CHF mortgage loans, rising labour costs, and higher contributions to guarantee funds. Nevertheless, the sector delivered a double-digit return on equity, which confirms the effectiveness of its sustained focus on improving operational efficiency.



Despite the decline in NBP interest rates (a total of 175 basis points in 2025), the sector recorded a 3.4% year-on-year increase in net interest income. According to forecasts and macroeconomic commentary, the cycle of interest rate cuts is expected to continue in the current year.

In 2025, the market operated under exceptional macroeconomic uncertainty related to global trade conditions and geopolitical developments. Economic sentiment in Western Europe showed only limited improvement – though solid compared with 2024 – while domestic producers and exporters were burdened by stagnation in the German economy. Domestic demand, including internal consumption, had a positive impact, supported by the stable financial situation of households and favourable prospects for the coming periods. The registered unemployment rate stood at 5.7% as at 31 December 2025, and the average gross wage in the enterprise sector increased by 8.0% year on year in 2025, with average CPI inflation at 3.6% year on year (GUS data). This had a direct impact on the development of lending in 2025 – there was a strong increase in the sale of cash loans (+26.6% year on year according to BIK) and mortgage loans (+20.9% year on year). At the same time, a noticeable rise can be seen in the share of refinancing of fixed-rate mortgage loans within new loan production.

While preserving its universal business profile in 2025, the Group focused particularly on strengthening relationships with affluent and private banking Customers, as well as with large corporates in the corporate banking segment. There was also a further increase in mortgage loan sales while maintaining a selective approach to acquisition (the 35% Debt-Service-to-Income ratio remained in force).

As a result, the Bank’s activity was recognised in the market with numerous awards, including third place in the “Affluent Client Ranking” and fourth place in the “Business-Friendly Bank” ranking by Forbes, as well as the title of Best Private Bank – Eastern Europe in the Global Private Banking Innovation Awards. The value of the offering dedicated to higher-end Customer segments was further confirmed by recent rankings of accounts and credit cards (including Moje Konto Premium which took first place in the September edition of Bankier.pl’s “Best Premium Accounts” ranking). Within the Konto Otwarte na Ciebie portfolio, Customers could still choose from the account with the Karta dla Wpływowych and the Film Card, now complemented by a refreshed Tennis card and the Pupil (my Pet) card designed for animal lovers. The Bank also introduced a new service – GOdreams, offering flexible saving plans and the account Konto Pełne Marzeń. As the first bank in Europe, the Bank launched a prestigious biodegradable Mastercard Business World Elite card for business Customers, offering exclusive benefits and functionalities.

The Bank continues to introduce and expand value-added services. The mamGO car financing platform (awarded in the Financial Product of the Year category in Gazeta.pl’s “The Best of Moto 2025” competition) was also made available in a physical format at the Bank’s branches. Moreover, as the first financial institution in Poland, the Bank – as part of a pilot project in cooperation with InPost – installed InPost Parcel Lockers in selected Customer Centres.

In the Corporate Banking area, the transformation of the service model continued with the implementation of a lean operating model in SME and Corporate Banking, as well as the simplification of the sales network structure. As part of expanding its offering for companies, the Bank introduced the Green Investment Loan, available to both existing and new Customers in the micro-enterprise segment. For SME Customers, new product packages (Classic, Comfort and Premium) were launched, reflecting a modern approach to Cash Management. E-commerce companies, which since late 2024 have been able to integrate their business on the Shoper platform with the Axepta BNP Paribas payment gateway, received a

new functionality – as part of the continued development of the Bank’s cooperation with Shoper, merchants can now enable instalment payments. The Bank also entered into a strategic partnership with Ryanair, Europe’s leading airline, to support payment processing in the Polish market. Thanks to the Axepta BNP Paribas payment gateway, Polish Ryanair passengers can pay for flights and all additional services included in their original booking in PLN using BLIK. Based on an agreement signed this year with the European Investment Fund (EIF), the Bank introduced a new financing solution for SME and Small MidCap companies – the InvestEU-backed loan, designed to support investments in modern technologies. In appreciation of the quality of its services and its commitment to developing the Polish SME sector, the Bank received the Global Finance’s Best SME Bank Award. The Bank also continued to strengthen its relationships with the innovative business ecosystem. In 2025, the Bank became a partner in the Startup Booster by Huge Thing acceleration programme under the Industry Test track, which enables new technology companies to test their solutions in cooperation with large organisations.

The Bank continues to automate and implement modern technologies that enhance efficiency and process integrity across the organisation. A key process improvement supporting business activity was the introduction of a decision engine into the SME credit process across all SME Customer Centres. During the reporting period, the Bank also launched the One Click cloud platform, which accelerates and simplifies database space management, as well as the Autenti mass qualified signature service, enabling users to sign dozens of documents in a single session.

The Bank continued its research and development of artificial intelligence-based solutions, including the organisation-wide Knowledge Chatbot “GENiusz”, a GenAI-based tool enriched with content in the areas of HR, ESG, Customer Care, Digital Accessibility and Operations. The Bank also supports the SME sector’s digital transition by joining the Polish Development Fund’s “Cyfrowa Wyprawka” initiative

The volume of sustainable financing reached PLN 13.6 billion at the end of 2025. In addition to further syndicated transactions, including Sustainability-Linked Loans, the Bank strengthened its capacity to provide loans for energy efficiency and renewable energy investments up to a total of EUR 100 million as a result of uncapped portfolio guarantees received from the EBRD; the agreement represents the EBRD’s first financial sector transaction in Poland under the EU InvestEU programme. The Bank also signed an agreement with the Polish Academy of Sciences to jointly promote regenerative agriculture and support the transformation of the agricultural sector, in line with its Food & Agro transition agenda. Companies cooperating with the Bank gained access to new ESG management tools: Corporate Customers participating in the EU ETS can buy and sell CO₂ emission allowances through the Bank, while SME Customers were given access to the Envirly platform for carbon footprint calculation and emissions management. In the area of social inclusion, 41.5% of the Bank’s Customer Centres now operate with the “Barrier-Free Facility” certificate, confirming accessibility for people with reduced mobility. The Bank’s commitment to sustainable transition and to socially and environmentally significant goals was once again recognised with numerous awards, including being named the leader in the ESG Stars category in the “Banking Stars” ranking by Dziennik Gazeta Prawna and Boston Consulting Group.

A fundamental principle of the GObeyond Strategy under the Together pillar is “People First: we put people at the centre.” In 2025, the Bank continued to support development programmes and carried out initiatives aimed at improving employee well-being, including further editions of #University – offering training in new technologies, programming, agile project management and the use of AI – as well as initiatives such as “Two Hours for Health” and Parenting Days. A key organisational priority remains to unlock employee potential through fostering team diversity and adapting to the needs of



people with disabilities and neurodivergent individuals. The Bank’s engagement and positive outcomes in these areas were confirmed by receiving the “Neurodiversity-Friendly Workplace” certificate from the asperIT Foundation and distinctions such as the “Ethical Company” title awarded by Puls Biznesu. In line with ongoing organisational and work model transformation, the Bank also implemented a new Beyond Agile management style in the Retail and Business Banking network and in Personal Finance, combining Agile practices with team self-organisation.

In April 2025, the Annual General Meeting of BNP Paribas Bank Polska S.A. adopted a resolution on the payment of a dividend for 2024, which was distributed on 9 May 2025, thereby fulfilling one of the strategic objectives set out in the GObeyond Strategy for 2022–2025.

Achievement of strategic financial targets in 2025

Indicator	Strategic target 2025	Implementation 31.12.2025
Return on equity (ROE)	~12%	18.7%
Cost/income ratio (C/I)	max 48%	41.2%
Share of sustainable financing	10%	14.6%

Actions under the strategy in 2025

PILLAR	KEY ACHIEVEMENTS 2025
#UP High-quality banking and non-bank products and services are the key to expanding the Customer base in an omnichannel environment, with the Bank focused on creating an excellent Customer experience through the design of personalised Customer journeys.	• New products and services: – Pupil (My Pet) Card – a themed card for animal lovers, along with a refreshed edition of the special offer for tennis fans: the Visa Tennis Card – GOdreams – a service offering flexible saving plans together with the account Konto Petne Marzeń, combining savings tools with support for Customers in achieving their financial goals – Green Investment Loan – available to new and existing Customers in the micro-enterprise segment – product packages for SMEs (Classic, Comfort and Premium) – InvestEU-backed loan – a new market solution for SME and Small MidCap companies to finance modern technologies, research and development – expanded cooperation with Shoper – enabling merchants to offer instalment payments through the Bank – mamGO car financing service available in Bank branches, with display vehicles in 20 selected locations

PILLAR	KEY ACHIEVEMENTS 2025
	– biodegradable Mastercard Business World Elite card for business Customers, offering exclusive benefits and functionalities (the first such card introduced by a bank in Europe) • Modern solutions: – Kantox Dynamic Hedging® – innovative and unique solution on the Polish market for Corporate Banking Customers conducting cross-border operations, enabling effective currency management and foreign-exchange risk mitigation – GOwadia Plus – an application integrated with GOonline Biznes for handling tender settlement processes – Development of the GO Biznes ecosystem – a new version of the application featuring an additional module for managing debit, multi-currency, charge and credit cards • New partnerships: – pilot launch of a new value-added service in Customer Centres – InPost Parcel Lockers installed in 24/7 accessible zones – cooperation with Ryanair – payment processing enabled through the Axepta BNP Paribas payment gateway, allowing passengers to pay using BLIK – financial cooperation with the retail chains RTV Euro AGD and Media Expert – partnerships with AFG Electric Motors (a Chinese automotive company responsible for vehicle distribution and sales) and Astara (the distributor of the Nissan brand)
#POSITIVE A responsible and trusted financial partner supporting the positive and sustainable development of Customers, businesses and society, and a guide for Customers in the world of digital and sustainable transition.	• PLN 13.6 billion in sustainable financing at the end of 2025 (based on Bank’s internal classification, see chapter Pillar Positive) • guarantee agreement with the European Bank for Reconstruction and Development, enabling the Bank to provide loans totalling EUR 100 million for pro-environmental investments by retail Customers (the first EBRD financial sector transaction in Poland carried out under the EU InvestEU programme) • Sustainability-linked financing – selected transactions: – Green Loan – Polish Logistics (UK) LLP (EUR 31 million), Accolade (EUR 33.5 million) – Sustainability-Linked Loan – for the Woodeco Group (PLN 155 million) and the Iglotex Group (PLN 84.9 million, with BNP Paribas holding a 50% share)



PILLAR	KEY ACHIEVEMENTS 2025
#STRONGER The global strength of the BNP Paribas Group, combined with dynamic technological development and end-to-end process optimisation, forms the foundation for organic growth and high Customer satisfaction.	– ESG-Linked Factoring – cooperation on the agreement concluded by BNP Paribas Faktoring with Raben Logistics Polska (PLN 140 million) • Expansion of the beyond banking offering – cooperation with EcoVadis, Envirly and Klim • CO₂ emission allowance transactions under the EU ETS for Corporate Customers • 144 Customer Centres certified as “Barrier-Free Facility”
	• Automation and modern technologies enhancing the Bank’s operational efficiency: – implementation of the One Click cloud computing solution for database space management – launch of the mass qualified signature service on the Autenti platform – expansion of GENiusz, the Bank’s GenAI-based knowledge tool, to include new areas: HR, ESG, Customer Care, Digital Accessibility and Operations – continued development of GenAI solutions within the IT area • Partner of the Startup Booster by Huge Thing acceleration programme, enabling start-ups to test and develop breakthrough solutions using partner infrastructure • First market implementation of e-receipts, available in Planet Cash ATMs and cash-deposit machines located in Customer Centres • “Cyfrowa Wyprawka” – joining the Polish Development Fund initiative supporting the SME sector in digital transition • 250 active robots supporting processes in Customer operations, risk and compliance, HR and internal services (35 new deployments in 2025) • 50% of the Bank’s 2024 net profit allocated to dividend distribution, DPS: PLN 7.86
#TOGETHER People First: we put people at the centre. An engaged and satisfied employee is the foundation of high Customer satisfaction. Agile@Scale and a new organisational culture form the basis for a diverse and inclusive work environment built on trust, courage and creativity.	• Implementation of the Beyond Agile work model in the Retail and Business Banking network and in Personal Finance, combining Agile practices with team self-organisation • 26.6 thousand hours of employee volunteering in 2025 (Capital Group) • Support for children and young people in financial and cybersecurity education through the new edition of the Mission Education programme • Employee well-being initiatives: “Two Hours for Health” campaign and Parenting Days • Strategic partnership with the Szlachetna Paczka Initiative (for the eighth time)

PILLAR	KEY ACHIEVEMENTS 2025
	• Top Employer Poland 2025 title and the “Neurodiversity-Friendly Workplace” certificate awarded by the asperIT Foundation • Inclusion for the fifth consecutive year in the Diversity IN Check list, recognising employers most advanced in DEI practices

Accelerate 2030 business strategy

On 10 December 2025, the Bank’s Supervisory Board approved the BNP Paribas Bank Polska S.A. Group Strategy for 2026–2030, “Accelerate 2030”. In the new Strategy, the Bank focuses on profitable, dynamic growth and improving operational efficiency. At the same time, as a trusted financial partner, it responds to local needs while opening global opportunities. The Group’s key ambitions for the next five years include significantly increasing the scale of operations (expanding the number of Customers served and strengthening its share in the loan and deposit market) while maintaining a prudent approach to risk and a strong focus on profitability, as well as enhancing the way it operates through further digitalisation and strict cost discipline.

The new Strategy defines the following key ambitions by the end of 2030:

- **net loans: +7% (CAGR¹ 2024-2030)**
- **income: +6% (CAGR¹ 2024-2030)**
- **cost/income ratio (C/I), net of bank tax: <38%**
- **ROTE²: 22%**
- **dividend payment ratio: 75% in 2030**
- **+1 million retail Customers**
- **10% market share in corporate loans**
- **PLN 25 billion new sales of sustainable loans**

1. compound annual growth rate
2. Return on Tangible Equity (ROTE) – calculated as net profit or loss divided by the average level of tangible equity, defined as total equity minus the planned dividend from the current year’s result, intangible assets and AT1 instruments.



Pillars of the Accelerate 2030 Strategy

Pillar EXPAND

Significant expansion of the Customer base, particularly in everyday banking, volumes and cross-selling. Enhancing the Customer experience as the foundation of all our activities.

Pillar STREAMLINE

Improving efficiency through the use of new technologies while continuing the achievements to date in reducing service costs.

Pillar IMPACT

Focusing on playing a leading role in the sustainable transition of our Customers and accelerating positive change at the national level.

The new Strategy addresses the challenges and opportunities facing the banking sector across all areas of the Bank’s operations. It sets out the following priorities:

- achieving a market share of over 5% in current accounts and increasing the retail Customer base by 1 million net Customers, through:
 - a significant enhancement of the value proposition and brand recognition in the highest-potential segments, particularly Generation Z (ages 18–30) and families,
 - strengthening Customer relationships and improving profitability through deposits and cross-selling,
 - developing activities in the leading segments of Private Banking and Affluent Customers;
- strengthening the Bank’s leadership position in Corporate Banking and reaching 10% market share in corporate lending, leveraging the BNP Paribas corporate DNA through:
 - further development of the multinational Customer (MNC) segment,
 - unlocking the full potential of Polish corporate Customers by utilising BNP Paribas Group solutions,
 - maintaining stable and efficient operations in the SME segment;
- improving efficiency through targeted investments:
 - in Retail Banking: a mobile-first distribution model with an optimised role for the branch network,
 - in Corporate and SME Banking: operational excellence to deliver the best Customer service model,
 - increasing efficiency through the use of AI,

- ensuring uninterrupted service availability and secure, scalable foundations of key technological infrastructure to support the Bank’s objectives,
- optimising the jaws ratio (the difference between annual revenue and cost growth) and achieving net cost savings while continuing to invest;
- strengthening the Bank’s leadership in sustainable finance by:
 - financing, at scale, a broad range of decarbonisation investments,
 - supporting and financing the transformation of agriculture and all related sectors of the economy.



Outlook

The key external factors that, in the Bank's assessment, may affect the Group's results in the coming periods include:

- **Geopolitical and international factors.** In the coming months, the macroeconomic and market environment may be influenced by persistent geopolitical tensions and shifts in international relations among key global economic players. The situation in the Middle East, including relations between the United States and Iran, remains a source of elevated uncertainty, particularly in the context of commodity market stability and global energy prices, which may translate into inflationary pressures. At the same time, discussions concerning security, access to strategic raw materials, and the growing importance of Arctic regions, including Greenland, may, over the longer term, affect resource policies and trade relations between the United States and Europe. Additionally, relations between the United States, Denmark, and Greenland continue to impact the political and economic stability of the region as well as global energy markets. Taken together, these factors may lead to heightened uncertainty, shifts in capital flows, and a more cautious approach to risk, indirectly affecting banking sector operating conditions, customer activity, and funding costs.
- **War in Ukraine.** At the outset, the war in Ukraine had a strong impact on the Polish economy, primarily through higher energy prices, disruptions in trade, and a large inflow of refugees. At present, the direct effects of the war appear to have been largely mitigated. Energy prices, although still higher than before the war, remain stable, and Polish industry and labour market have largely adapted to the new operating environment. The war continues to influence fiscal policy. As in the previous year, defence spending in 2026 is expected to remain close to 5% of GDP.
- **Global economic conditions.** According to the January edition of the IMF's *World Economic Outlook*, global GDP growth is projected at 3.3% in 2026 and 3.2% in 2027, slightly higher than in the October forecast. The latest IMF report anticipates a modest acceleration of growth in the United States, from 2.1% in 2025 to 2.4% in 2026, and a slight slowdown in the euro area, where real GDP growth is expected to ease from 1.4% in 2025 to 1.3% this year. At the same time, the IMF expects inflation to move closer to central bank targets. Price dynamics are projected to return to desired levels earlier in advanced economies than in emerging and developing economies. For Poland, the IMF forecasts GDP growth of 3.5% in 2026, followed by a slowdown to 2.7% year on year in the subsequent year. Meanwhile, average annual inflation is expected to decline to 2.8%, compared with 3.7% recorded in 2025.
- **Monetary policy of major central banks.** In addition to geopolitical developments, the key factor influencing the pace of global recovery is the policy stance of the world's most important central banks. In June 2025, the European Central Bank (ECB) paused its monetary-easing cycle, and the accompanying communication suggested that, after rate cuts totalling 200 basis points, the easing cycle in the euro area is nearing its end. In the United States, the Federal Open Market Committee (FOMC) implemented three interest rate cuts in 2025, totalling 75 basis points, lowering the federal funds target range to 3.50–3.75% in response to weaker labour market data. Market forecasts for 2026 point to a slower pace of easing, with expectations centred on one or two rate cuts this year. Changes in U.S. trade policy under President Donald Trump have significantly increased uncertainty regarding the pace of economic growth and inflation in the United States. FOMC members are currently divided on the future course of monetary easing. At the most recent meeting, three officials voted against a rate cut, while two preferred to keep rates unchanged altogether.
- **Actions of the National Bank of Poland.** In December 2025, the Monetary Policy Council (RPP) decided on another adjustment of the reference rate, cutting it by 25 basis points to 4.00%. In total, the RPP cut interest rates six times in

2025, by a cumulative 175 basis points. We also believe that the monetary policy easing cycle that began last year in Poland has not yet come to an end. This was explicitly confirmed by NBP Governor Adam Glapiński during his January press conference, where he stated that the Council currently maintains a dovish stance and that there is still room for further interest rate cuts in Poland. The outlook for inflation – which, according to the central bank governor, has declined in a lasting manner – supports continued monetary easing. In this context, we expect the reference rate to be lowered to at least 3.50% this year, although we see a material risk of a deeper adjustment (by 25–50 basis points) in the coming months. At present, the market is pricing in a decline of the main policy rate to 3.25% this year.

- **Behaviour of the zloty against key currencies.** In the second half of 2025, external shocks (including further announcements on tariff changes) and domestic shocks (such as the presidential election) eased noticeably. As a result, the zloty stabilised against major currencies in the later part of the year. In Q3 2025, the EUR/PLN exchange rate moved within a narrow range of 4.24–4.29, and in Q4, it strengthened to 4.21. Solid data from the Polish economy supported the appreciation of the domestic currency toward year-end. Given the favourable economic growth outlook and the monetary easing cycle approaching its end, we expect the EUR/PLN exchange rate to remain stable, fluctuating around 4.20. The main upside risk to this forecast stems from geopolitical factors that could influence capital flows into emerging markets.
- **Economic activity in Poland.** In 2025, Poland's Gross Domestic Product increased by 3.6% according to preliminary data. The main driver of economic activity was domestic demand, which grew by 4.0%, including a 3.7% increase in household consumption expenditure and a 4.2% rise in gross fixed capital formation. As a result, the contribution of foreign trade to GDP remained negative, although export data indicate some revival in foreign trade sales. Estimates published by Statistics Poland (GUS) show that in the fourth quarter of 2025 alone GDP increased by 4.0% year on year in unadjusted terms (and by 1.0% quarter on quarter and 3.6% year on year after seasonal adjustment). This year, we forecast a slight acceleration in economic growth, to 3.7%, compared with 3.5% in the previous year. We expect that, in the short term during 2026, GDP growth may temporarily exceed 4%, supported in part by inflows of EU funds (including the National Recovery Plan). For 2026, we anticipate a historically unprecedented inflow of EU investment funds to Poland, potentially amounting to around EUR 40 billion. A particularly strong impulse for investment should come from National Recovery Plan funds, especially grants. Under the grant component of the National Recovery Plan, Poland is expected to receive a total of approximately PLN 108 billion, which implies that transfers in the current year could reach nearly PLN 70 billion. Polish producers should also benefit from an anticipated improvement in economic conditions in Western Europe. Despite slowing nominal income growth (due to more moderate wage increases), household consumption is expected to strengthen as inflation and debt servicing costs decline, continuing the trend observed last year. All these factors point to rising demand for credit in the new year, both from households and businesses.
- **Inflation trajectory.** In Q4 2025, CPI inflation in Poland continued to slow down. Between October and December, price growth reached 2.6%, compared with 3.0% in July–September. Net of food and energy prices, core inflation stood at 2.8% year on year, i.e., 0.4 percentage points lower than in Q3 2025 (3.2% year on year). In the coming months, core inflation will continue to gradually ease, supported by solid but not overly rapid GDP growth and a slowdown in wage dynamics. Labour costs are expected to rise at a slower pace, as indicated, among others, by business surveys. Energy prices will also play an important role in shaping CPI in 2026. A decision by the Energy Regulatory Office will reduce household gas tariffs starting in July. In addition, developments in commodity markets, particularly crude oil, as well as the USD/PLN



exchange rate have significantly eased import price pressures. As a result, we expect limited upward pressure on goods prices. We forecast that CPI inflation this year will average 2.1% year on year, remaining slightly below the National Bank of Poland’s inflation target of 2.5% for much of the year.

- **Imbalance in public finances.** According to Statistics Poland (GUS), Poland’s general government deficit in 2024 increased to around 6.5% of GDP, compared with 5.3% of GDP in 2023. The Ministry of Finance estimates that in 2025 the general government sector deficit will amount to approximately 7% of GDP. The widening deficit relative to previous years is driven, among other factors, by higher defence spending, increased social benefit expenditures, and wage increases in the public sector. Poland is currently subject to the Excessive Deficit Procedure (EDP) imposed by EU institutions, which obliges the government to reduce the budget gap to 3% of GDP by 2028. According to the European Commission, persistently high fiscal deficits combined with slower nominal GDP growth will push the public-debt-to-GDP ratio higher in the coming years from 55.3% in 2024 to 69.2% in 2027. The rising debt ratio will serve as an additional argument for maintaining fiscal discipline in the years ahead.
- **Sentiment in major financial markets.** In the near term, sentiment across global financial markets will remain sensitive to expectations regarding monetary policy in the world’s largest economies, particularly the United States and the euro area, as well as to incoming macroeconomic data shaping assessments of economic growth momentum and inflation. Another important factor will be the volatility in equity, bond and currency markets, driven by asset valuations, the cost of capital, and investors’ willingness to take on risk. In addition, persistent geopolitical tensions and uncertainty surrounding commodity markets may influence capital flows and prompt more cautious behaviour among market participants, indirectly affecting financing conditions and the activity of the banking sector.
- **Loans indexed to WIBOR.** The dispute over loans indexed to the WIBOR benchmark gained media attention at the end of 2022. In July 2023, the Polish Financial Supervision Authority (UKNF) published a statement emphasising that, in its assessment, there are no grounds to question the credibility or legality of WIBOR, particularly in the context of its use in PLN-denominated mortgage agreements. On 11 June 2025, a hearing was held before the Court of Justice of the European Union (CJEU) regarding questions referred on whether national courts may assess loan agreement provisions referring to WIBOR under Directive 93/13. On 11 September 2025, the CJEU Advocate General issued an opinion confirming that courts cannot challenge the methodology for determining WIBOR, as it is governed separately by the EU Benchmarks Regulation (BMR), and that banks fulfilled their required disclosure obligations. On 12 February 2026, the CJEU announced its judgment in the case, confirming the preceding opinion. For the first time in history, the WIBOR benchmark – the key reference rate for PLN-denominated variable-rate loans – was removed from a loan agreement by a court in Suwałki on 4 October 2024 (non-final judgment). According to experts, including the Polish Bank Association (ZBP), this judgment does not pose a risk to the established line of case law. In all cases concluded with final judgments to date, the rulings have been favourable to banks.
- **Draft of the new “Swiss-franc loan” act.** On 30 January 2025, the Ministry of Justice published a draft Act on special solutions for handling cases concerning loan agreements denominated or indexed to CHF concluded with consumers. Following comments raised in the public consultation and the CJEU judgment of 19 June 2025 in case C-396/24 (Lubreczlik), a new draft Act was published dated 30 June 2025. The goal of the draft law is to accelerate court proceedings concerning loan agreements denominated or indexed to CHF. The key mechanisms set out in the draft include:

- protection of consumer interests (Article 3 of the draft) – once an action lodged by a consumer is served on the defendant or once a counterclaim lodged by the consumer is served on the defendant, the obligation of the consumer to perform the benefits arising from the loan agreement is suspended by law until the proceedings are closed with a final judgment;
- plea of offset (Articles 5 and 18 of the draft) – change to the time limitation for the option of raising the plea of offset in the proceedings (until the proceedings are closed in second instance);
- counterclaim (Article 8 of the draft) – change to the time limitation in civil proceedings (under the general procedure, no later than in the statement of defence) – allowing for a counterclaim to be lodged until the hearing is closed in first instance.

The draft law was tabled to the Sejm on 2 October 2025. The Sejm held the first reading of the draft on 16 October 2025, after which the draft was referred to the Committee for Justice and Human Rights (and the Committee for the Economy and Development). Both Committees started to work on the draft on 17 December 2025 at a joint meeting. The work on the draft is scheduled to continue in 2026.

- **“Free credit sanction”.** At its meeting on 21 March 2025, the Financial Stability Committee identified the application of Article 45 of the Consumer Credit Act, known as the free credit sanction, as a new systemic risk in the domestic financial system. One of the key issues related to free credit sanction is the lack of proportionality, despite the fact that the violations listed in the Consumer Credit Act vary significantly in nature and severity. The number of court cases concerning free credit sanction has been rising rapidly. As of the end of 2025, the number of pending cases stood at 21,600. Work is underway on a new Consumer Credit Act, scheduled to enter into force in November 2026, which is expected to provide a clearer regulatory framework for free credit sanction.
- **Digital operational resilience.** According to a report by Check Point Software Technologies, the financial sector ranks as the second most frequent target of cyberattacks in Poland. With the growing importance of digital channels in customer interactions, banks are particularly exposed to cyber risk. This risk intensified following the outbreak of the war in Ukraine in February 2022. In response to rising cyber threats, the European Commission’s Digital Operational Resilience Act (DORA) entered into force in 2023. The regulation aims to mitigate systemic risk posed by providers of critical ICT services to the financial sector. It consolidates regulatory requirements and introduces direct supervision of ICT service providers by European financial supervisory authorities. Analyses conducted by the Polish Bank Association (ZBP) indicate that the banking sector is well prepared for the implementation of the regulation. The obligations imposed by DORA became fully applicable on 17 January 2025.
- **Transformational pressure.** According to the latest Deloitte reports, financial sector institutions will continue to face pressure to accelerate the scaling of technologies that until now have remained in testing or pilot phases. This applies in particular to solutions in the areas of data architecture and artificial intelligence, where investment payback periods remain long while ambitions continue to grow. At the same time, a global trend is emerging toward the increasing role of digital forms of money and the development of regulatory framework governing this space.
- **Changes to CIT for banks.** In November 2025, President Karol Nawrocki signed legislation increasing the corporate income tax (CIT) rate for banks. The act provides for a rise in the income tax rate from 19% to 30% in 2026, 26% in 2027, and 23% from 2028 onwards. At the same time, the act reduces the rate of tax on certain financial institutions for banks from the



current 0.0366% of the tax base to 0.0329% in 2027 and 0.0293% from 2028. According to the regulatory impact assessment, the CIT increase is expected to generate an additional PLN 6.6 billion in budget revenues in 2026.

In 2026, both the Bank and the sector as a whole enter the year well-capitalised and well-prepared to support the Polish economy. For the Bank, this marks the first year of implementation of the new strategy – Accelerate 2030.



Implementation of the strategy

36	Pillar UP
37	Segment description
47	Distribution channels
49	Operations and business support area
49	Entities of BNP Paribas Bank Polska S.A. Group
52	Pillar POSITIVE
52	Sustainable financing
58	Positive banking
60	Community involvement
66	Environmental responsibility
68	Pillar STRONGER
68	Digitalisation and innovation – IT strategy
72	Support for innovation
74	Cybersecurity
75	Pillar TOGETHER
75	Good workplace
77	Remuneration
78	Diverse and inclusive workplace



Pillar UP

Pillar description

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

Retail Banking and Personal Finance

The priority of retail banking and PF was to achieve high Customer satisfaction (Top 3 NPS in the market), thanks to which the Bank would 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 implemented innovative products and services, often in cooperation with internal partners (companies from the BNP Paribas Group) and external partners, and planned to make even greater use than before of personalised communication based on advanced CRM and data analytics. Further digitalisation of Customer processes was 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 were to be available in remote channels, and sales via digital channels are expected to exceed 50%). The Bank planned to 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 the Sustainable Development Goals. Finally, the Bank planned 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 aimed to be number 1 for international Customers (increase in the number of active Customers by over 22% vs. 2021) by leveraging 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 strived to be the first-choice bank for large corporations with tailored solutions and an excellent service model. The Bank provided 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 expected to increase the base of active Customers served in the SME and corporate banking segment by over 18% compared to 2021 and to reach operational excellence to build positive Customer experiences. One of the key goals in this area was to optimise and shorten the credit process. The Bank leveraged its leading market position in the agricultural segment and its unique competences in this area to strengthen its market position among food processors.

Strategic commitments and their implementation

Indicator	Strategic objective 2025	Implementation 2025
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 (retail Customers and micro businesses)	4.5 million	3.7 million
Sales through digital channels (retail Customers)	>50%	65%
Market shares in new sales (ROR accounts, cash loans, mortgages)	7%	ROR – 4.4% cash loans – 3.3% mortgage loans – 4.5%
Number of active micro companies	340 thousand	275 thousand
Number of micro companies active in digital channels	230 thousand	193 thousand
Maintaining leadership in the farmers’ segment (market share in loans)	>25%	22%
NPS – SME Banking	TOP 3	8th place
Increase in the number of active food processors [vs. 2021]	+30%	+30%
Increase in the number of active Customers (corporate and SME banking) [vs. 2021]	>18%	+5%
Increase in the number of active international Customers [vs. 2021]	>22%	+31%
Number of Customers active in digital channels (corporate and SME banking)	37 thousand	31 thousand
Increase in credit volumes (corporate and SME banking)	+6% CAGR [2025-2021]	+5%



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 2.5 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 exposure 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 2.5 million euros, conducting activities classified according to selected PKD 2025 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 from PLN 3 million to below PLN 4 million, when the collateral on agricultural land covers at least 50% of the credit exposure,
- non-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 wealth planning and collaborates with Customers’ legal and tax advisers in succession planning – it is a forerunner of the family office service on the Polish market. It offers one of the richest product and service portfolio available for Family Foundations – including entities in 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 level. 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.

Personal Finance Banking is responsible for the 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, leases (operational and finance leases) 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 2025

INITIATIVE		BNP Paribas - my main Bank
INITATIVE 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		• New services and offers made available to Customers: • GO Dreams – a service that helps Customers manage their budgets in a more thoughtful and balanced way. It enables simple, convenient and personalised regular saving towards personal goals and dreams. • Pupil (My Pet) Card – an acquisition project aimed at pet lovers, offering a package of discounts and benefits • “Lucky Sevens – 3×7%” offer – a triple benefit for opening an account: 7% interest on the savings account, 7% cashback on card payments, and 7% interest on the “Konto Pełne Marzeń” savings product. • “Pay conveniently and win prizes” competition – for holders of Mastercard debit cards, offering a chance to win a voucher for a contactless payment ring and 1% moneyback on mobile transactions for nine months • Launch of the new “Dobra Karta” product – featuring highly attractive pricing conditions related to card servicing and instalment plan costs • “Deposit for You” offer – dedicated interest rates for Customers using GOonline and GOMobile. • option to block and unblock subscription-based card payments during a phone call or a visit to a Customer Service Centre • Customer Appreciation Day initiative – an action recognising Customers for their transactional activity and charitable transfers, including the waiver of fees for instant transfers • improvements to the remote account opening process, including enhancements to the system handling ID document photos and video verification • partnership with Media Expert – making the Bank’s financial offer available in 150 of the brand’s physical stores (target: 600 stores) • expansion of the “Cash Loan for Green Changes” offer, including new goals related to electromobility. • optimisation of the lease agreement activation process for vehicle financing – reducing the time from verification of leasing documentation to contract activation by 22%.
KEY FIGURES		• +16% year-on-year growth in cash loan sales • +15% year-on-year growth in investment product sales • +258% year-on-year growth in mortgage loan sales

INITIATIVE		Development of sales in the digital and omni-channel model
INITATIVE 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 in sales to the Customer base based on data analytics, AI and personalisation. Expansion of product offerings available in digital channels
ACHIEVEMENTS		• improved efficiency of the mortgage process through simplification and standardisation of documentation requirements for loan applications, partial and full repayments, and the process of updating insurance policies in Goonline; new remote-channel processes: shortening the loan tenor period after an overpayment and enabling tranche disbursement to developers • launch of the cash loan application process using Open Banking for new Customers on mobile devices, via the telephone application path and in Goonline; extension of the maximum loan tenor in electronic channels • introduction of the consolidation loan sales process in electronic channels • enabling entrepreneurs to open business accounts if they already have access to the Bank’s electronic channels • display of debit card fee information and option to submit applications under the “Active Parent” programme in online banking • enhancements to foreign transfers, tax transfers and transaction history to help Customers better identify and analyse their spending • optimisation of the document submission process for car loans • launch of a paperless instalment loan agreement signing process for Customers without an email address, eliminating the need for paper contracts. • strengthening security in electronic channels through: – the “Panic Button” feature in the GOMobile app, enabling instant blocking of online banking access, – two-step login and dual authorisation for changes to transaction limits, – enhanced behavioural security protection, – verification of files uploaded by Customers for security and electronic-signature compliance. • GOMobile enhancements: – simple and fast activation of the Currency Exchange service, option to update ID document details and to add BNP Visa cards to digital wallets, – access to GO Dreams, enabling simple and convenient regular saving towards personal goals, – improvements to the instalment loan agreement signing process.
KEY FIGURES		• 70.3 million BLIK transactions in 2025, +17% year-on-year • 354 million mobile banking logins in 2025, +8% year-on-year



INITIATIVE	Growing sales in a digital and omnichannel model
INITATIVE 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	• opening a Business Account independently by sole proprietors who already have retail Customer access to GOonline or GOMobile, using a fully remote process • 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 enforcement 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 institution • GODEALER – a currency exchange application with 24/7 transaction processing. Business Customers can also use bi-currency deposits • 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 BNP Paribas Leasing Solutions – a comprehensive financing offer based on fixed or variable interest rates, enabling the implementation of projects supported by European Union subsidy programmes (including photovoltaic installations, heat pumps, charging stations and energy-storage systems) • cooperation of the Bank and BNP Paribas Leasing z FinTech 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 • cooperation with Elavon - wide range of payment terminals (including softPOS application). Option to order a terminal in GOonline remotely • Carbon Footprint Calculator – service made available in partnership with Enviroly, supported by artificial intelligence algorithms - enables easy calculation and management of carbon footprints
KEY FIGURES	• GODEALER: activation of the system by more than 2,300 micro-Customers in 2025; execution of more than 130,000 transactions with a total volume of PLN 1.2 billion • Micro Leasing: PLN 384 million of financed contracts in 2025

BNP Paribas Bank Polska S.A. Brokerage Office

The BNP Paribas Bank Polska S.A. Brokerage Office (Brokerage Office) mainly serves retail Customers. The Brokerage Office’s services complement the Bank’s range of investment products. The Brokerage Office 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 Office manages portfolios and provides investment advice for Customers of the Premium Banking and Wealth Management segments.

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

Brokerage in figures for 2025:

- conducting sales of more than 715 funds managed by 19 companies,
- PLN 14 billion - the value of Customers’ assets in investment funds distributed by the Brokerage Office at the end of December 2025,
- PLN 892 million - the value of investment certificates issued in 2025 for the Brokerage Office’s Customers in cooperation with the BNP Paribas Group (+13% year on year),
- PLN 142 million - revenue from brokerage services and distribution of investment products (+24% year on year),
- a 62% year on year increase in assets in the portfolio management service for Wealth Management Customers,
- a 9% year on year increase in commission income from stock exchange transactions of the Brokerage Office’s Customers,
- increase in results of investment advisory services and portfolio management well above their benchmark indices.

Table 5. Share of the Bank’s Brokerage Office in turnover on the WSE

		31.12.2025		31.12.2024	
		volume	share	volume	share
Shares	PLN million	5,920.37	0.60%	4,154.84	0.60%
Bonds	PLN million	706.29	5.13%	281.43	2.91%
Contracts	units	212,236	0.87%	170,468	0.64%
Investment certificates	PLN million	0.94	1.35%	0.15	0.19%
Options	units	17,689	4.37%	21,373	5.05%
Structured products	PLN million	212.30	3.22%	291.71	5.45%



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 80 million, and also to entities that are part of international capital groups.

Corporate Banking Customers are divided into four main groups:

- Polish corporations with annual net sales revenue of between PLN 80 and 600 million,
- 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.

These groups include Agro and non-Agro Customer subsegments.

The **Small and Medium-sized 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 8 million to PLN 80 million. This subsegment also includes groups of agricultural producers,
- Non-Agro Customers – a sub-segment for entities with full financial reporting and net sales revenues for the previous financial year of PLN 8 million to PLN 80 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 up to 60 million, as well as individual farmers not maintaining full financial reporting, if their credit exposure is up to PLN 6 million, and individual farmers, regardless of their credit exposure level, provided they reach a significant scale of production as defined in the detailed rules (including, among others: field crops above 220 hectares, ground-grown fruit and vegetables above 50 hectares, greenhouse cultivation above 1 hectare).

Implementation of key strategic initiatives in 2025

Corporate Banking

INITIATIVE	New approach to the Customer using the strength and potential of the Group
INITATIVE 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	• strengthening the Bank’s position on the international Customer market • acquisition of new international Customers in cooperation with the BNP Paribas Group • supporting Customers in their green transition through an ecosystem of products and services as part of the beyond banking offering featuring innovative sustainability solutions including, among others, a carbon footprint calculator and ESG rating
KEY FIGURES	• increase in the number of active international Customers by 4% year on year (+137 year on year) • dynamic growth in loans to international Customers of 18% year on year • 23% year on year increase in the value of the sustainable financing portfolio

INITIATIVE	New Customer service model
INITATIVE 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	• increasing the level of automation and use of the GO Business ecosystem in Customer relationships: module for Cards in GOMobile Biznes, performance improvements for instant mass payments, and the release of new versions of the Administrator Panel and Import Letters of Credit modules • implementation of applications – GOwadia Plus – a modern tool enabling Customers to comprehensively manage settlements related to tender processes – FX Pl@net – a new version of the currency exchange platform, now also available in English • implementation of changes to the operating model (including, among others, the centralisation of support functions) and a new KYC process model for Customers in the Polish corporate segment (up to PLN 600 million in turnover) • further specialisation in servicing sector Customers (food & agro, public sector entities) and optimisation of the sales network • continued growth in the use of self-service solutions by Customers



INITIATIVE	New Customer service model
KEY FIGURES	• increase in the number of active Customers by 2% year on year • increase in lending volumes in Corporate Banking of 11% year on year • credit process duration reduced by 24% year on year

Small and Medium-sized Enterprises

INITIATIVE	New Customer service model
INITATIVE DESCRIPTION	Sales area transformation by providing Customers with the widest range of self-service solutions and providing centralised and dedicated after-sales service
ACHIEVEMENTS	• year on year increase in gross profit of SME Banking thanks to maintenance of good quality of the loan portfolio and low cost of risk combined with lower revenue due to lower interest income • for SME Customers: continuation of changes to the operating model in the area of sales support (including the development of the digital Customers portfolio), implementation of a new KYC process model, and centralisation of support functions • specialisation in servicing sector Customers and optimisation of the sales network • further expansion of the Digital Customer Team dedicated to Customers who prefer active remote contact with the Bank • implementation of a credit process using an automated decision engine for SME Customers, including Farmers
KEY FIGURES	• 22% of SME Customers served by the Digital Customer Team • growth in new loan production and a 43% year-on-year reduction in credit process duration



Other initiatives of the business line

INITIATIVE	ACHIEVEMENTS	INNOVATIVE PRODUCTS AND SERVICES	KEY FIGURES
CASH MANAGEMENT	- development of cash management product and service offering - continued migration to new payments communication format XML_ISO20022	payments: improved performance of mass transfers (including instant Express Elixir transfers) cards: introduction of a new prestigious Mastercard Business World Elite business card offering advanced features and benefits, while also being environmentally friendly (made from biodegradable material) new product packages (Classic, Comfort, Premium) designed to meet the diverse needs and stages of development of SMEs - automation of foreign payments - enhancements in ongoing post-sales customer service in the Customer Service Office, including: - automated phone connection with the dedicated Customer Service Advisor assigned to a specific Customer, enabled through NIP (tax ID) recognition - launch of a chat-based virtual assistant (powered by internal GenAI models) that supports Customer Service employees in their daily phone and email interactions with Corporate and SME Banking Customers GOwadia Plus – launch of a new, modern tool for Customers to comprehensively manage finances related to tenders and projects. The application gathers information on all ongoing tenders and payments, and automates the process of receiving and returning funds, ensuring transaction security and saving time.	- increase in the number of incoming transactions (incoming transfers + cash deposits) by 2% year on year - increase in the volume of incoming transactions (incoming transfers + cash deposits) by 3% year on year
FINANCING CORPORATE CUSTOMERS	- continued 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 - expansion of the implementation of the credit process for SME Customers using an automated decision-making engine to all SME Customer Centres - implementation of a credit process with a decision engine for Farmers - implementation of regulatory changes and adjustments to sales processes resulting from the CRR3 - introduction of changes to the loan disbursement process	- implementation of automatic import of companies’ annual financial statements from eKRS into the Bank’s systems (in April) - launch of a new credit process for Farmers with an automatic decision engine for credit decisions up to 4 million PLN (in October). The new credit process will enable: - faster credit decision-making - elimination of unnecessary steps in the process - ultimately, full automation of the credit process for selected transactions of individual farmers - changes and automation in electronic credit applications (eWnioski) for SME and Corporate Banking Customers – further adjustments aligned with changes in credit processes - introduction of changes to the loan disbursement process – optimisation of documentation verification before loan disbursement for SME and Corporate Customers (in December)	- over 10,600 credit decisions made in the new credit process, and 60,000 orders processed by credit administration 23% of SME credit decisions made using the automatic decision engine 8,300 financial statements automatically retrieved from eKRS and published internally (verified and approved as a source for further internal processes)



INITIATIVE	ACHIEVEMENTS	INNOVATIVE PRODUCTS AND SERVICES	KEY FIGURES
E-BANKING	• Development of the GO Biznes ecosystem: • release of new versions of GOonline Biznes modules: Administrator Panel, GOonline Biznes user onboarding process, and Import Letters of Credit • release of a new version of the GOmobilе Biznes mobile app featuring a new card module for handling debit, multi-currency, charge, and credit cards • increasing the level of automation and the use of the GO Biznes ecosystem in interactions with Customers	GOonline Biznes: • launch of the new Administrator Panel, enabling management of system user permissions, including: – adding, removing, and temporarily blocking users, as well as general user management – modifying permissions for accounts and functionalities – setting time and IP address restrictions for using GOonline Biznes – adding, modifying, and deleting approval schemes (for transfers, applications, counterparties, trade finance requests) – handling administrator instructions – access to reports and the history of actions performed in the Administrator Panel • release of a new onboarding process for GOonline Biznes users, with added functionalities, including: – archiving attachments and generating KDO – storing identity document expiry dates – an application for non-residents – automatic approval of applications for existing users whose data is complete and correct • launch and enhancement of the Import Letters of Credit module - new interface and new functionalities, including: – a new intuitive layout and navigation that simplifies order completion (through validations and hints) – a summary view of all open letters of credit (broken down by currency) – display of available limits on the module’s main screen – access to key information and actions directly from the lists of letters of credit, orders, and payments – flexible search and additional filters (e.g., by user) – adding SWIFT field numbers to the names of individual fields in orders – option to add new fields in orders, such as country of origin of goods or comments for the Bank – option to edit counterparties directly in the Import Letters of Credit module • launch of the new Cards module, enabling: – viewing the list of cards, card transactions, and available limits – card management (card activation, card blocking, PIN setup, etc.)	• increase in mobile banking users by 17% year on year
CUSTOMER LIFECYCLE	• continued automation of onboarding and post-sales processes	• expanding the range of Customers eligible for fully digital onboarding and implementation of new tools for remote identification • expansion of the scope of instructions in the self-service module, resulting in a significant increase in submitted requests • optimised re-segmentation process between the Micro-enterprise segment and the SME segment • new digital process for adding users and managing their permissions in GOonline Biznes • new onboarding process for Customers using only a leasing product • completion of the centralisation of the onboarding process for SME and Commercial Customers	• 78% of SME Customers and 67% of Corporate Customers opened through a fully digital onboarding process (in Q4 2025) • increase in the self-service index for SME and Corporate Customers to 58% (in Q4 2025)



Food & Agro Area

Area description

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

Micro Customers and Small and Medium-sized Enterprise Banking

In lending, the Bank's offering includes:

- revolving loans, including the Agro Express secured overdraft and loans with a BGK guarantee and interest rate subsidies,
- investment loans for farmers and Agro companies, including Agro Progres, Unia+ (to co-finance EU projects),
- subsidised loans with interest rate subsidy or partial capital repayment (under an 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 leveraging 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 analyses, including changes in industry trends,
- initiating cooperation with the BNP Paribas Group in the field of agro-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 transition of the agro-food sector.

Implementation of key strategic initiatives in 2025

INITIATIVE		Agronomist - an innovative way to build relationships and share 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 the transition towards sustainable agriculture and digital transition. The portal's content covers the entire F&A value chain with special attention to local communities
ACHIEVEMENTS		• Agroemisja – a greenhouse gas emissions calculator at the farm level for dairy, livestock, and crop production, including water footprint assessment • Regagri Explorer – a professional tool for estimating the level of CO₂ absorption in soil • Nitrogen use calculator and an agricultural weather service with SMS alerts • Kredytomat – a simple and user-friendly search tool for bank products, helping farmers find the solutions best suited to the needs of their agricultural operations • ESG materials – preparation and publication of materials related to environmental and social impact reporting 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
KEY FIGURES		• 209,700 unique visitors to the portal (source: Google Analytics 4) • 14.3 million hits in Google (source: Google Search Console)

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
ACHIEVEMENTS		• analyses of markets and selected subsectors of the agro-food industry, analyses and publications related to the market implications of the war in Ukraine, used both internally and externally by the Bank • organising sessions on specific food market areas for existing and prospective Customers and • active substantive participation in economy-wide and sector-specific events, cooperation with a number of organisations from the agro-food sector
KEY FIGURES		• increase in the average annual deposit balance of farmers by 8.4% year on year (with a stable number of farmers) • increase in loan balances in the Corporate Banking segment by 4.6% year on year (with a stable number of active food processing companies)



Other initiatives of the business line

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 under 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.

In 2025, the following changes were introduced to this product:

- March – we launched financing for investments carried out by pig producers, secured with the Agromax guarantee and preferential subsidy conditions for interest repayment. Eligible Customers may receive a subsidy for four consecutive years from the loan disbursement date, amounting to:
 - 100% for the first two years, up to 8 percentage points,
 - 50% for the following two years, up to 4 percentage points.

The same subsidy levels also apply to working capital financing linked to the investment.

- June – we expanded the eligibility of this loan to include producers connected to agricultural products (e.g., bakeries, confectionery manufacturers, pasta producers, ready-meal producers), as well as companies providing services to agriculture or forestry.

Sales of FGR Plus Guarantees in 2025 placed the Bank first among all banks offering this product, with a 37% market share.

Working capital loans with FGR guarantee

In September 2025, the Ministry of Agriculture asked banks for proposals to support farmers in response to falling grain prices. In October, the Bank launched a **new version of the existing working capital loan with an FGR guarantee** and an interest rate subsidy (extending the subsidy period from 12 to 24 months, increasing the subsidy for Customers from 5% to 7%). From October to December 2025, we granted over 2,100 loans under the FGR initiative, totalling over PLN 640 million (market share: 21%).

Insurance – cross-sell

Through cooperation with Generali Polska TU S.A., the Bank offers a wide range of insurance products, including: crop insurance with state subsidised premiums, agricultural machinery insurance, life and health insurance, and Generali Agricultural Farm insurance. Crop insurance accounts for the largest share of sales: across the spring and autumn campaigns, 4,400 policies were concluded, with total premiums of PLN 27.8 million. Insurance sales represent a significant part of Agro's non-interest income.

Cooperation with the Polish Federation of Cattle Breeders and Dairy Farmers (PFHBIPM)

PFHBiPM is a nationwide industry organisation with over 11,000 members, including individual farmers, state farms, state-owned companies, private enterprises, cooperatives, and leased farms.

The Bank has cooperated with the Federation for many years, and the cooperation agreement signed in 2025 enabled us to reach a broader group of breeders. Under the agreement, we conducted promotional and advertising activities, participated in meetings, conferences, and promotional events, including the Federation's 30th anniversary and 10 regional conferences for milk producers – Mleczne Laury (a special promotional offer was prepared for selected farmers: 0% front-up fee on selected loans related to agricultural operations).

Sales support and Customer relationship activities

- **Value Chain Financing** – in the second half of 2025, the first transactions were signed with agro-food processors as part of developing financing across the food production value chain (farmer – food processor – distributor – consumer).
- **“Time for Financial Harvest” – until 31 December 2025**, a deposit promotion targeted at new Customers (Farmers) in the Micro and SME segments who opened an Agrobiznes or AgroBOX account with attractive interest rates on deposited funds.
- **Sustainable agriculture** – implementation of tools and operational activities supporting the transition of farmers toward regenerative agriculture, including internal training, meetings with farmers, press publications, and cooperation with external partners (e.g., signing a cooperation agreement with the Polish Academy of Sciences).
- **Agro Academy** – second edition – a six-month series of sectoral training sessions (in-person and online) on crop and livestock production and sustainable agriculture, delivered to 73 advisors (Micro business segment), totalling 42 workshop hours.
- **O N A: WOMAN IN AGRO** – a new format of meetings organised by the Bank in cooperation with Leaders of Innovation, dedicated to women in the agricultural sector: farm owners, community leaders, specialists, and innovators. The concept is built on four elements:
 - EARTH: knowledge and foundations (EU funds and artificial intelligence)
 - WATER: exchange of experience (panel discussion – innovations in agriculture from women's perspectives)
 - AIR: banking solutions (new products and services for farmers)
 - FIRE: development and relationships (workshops on communication across genders and generations).



Corporate and Institutional Banking area

Area description

Corporate and Institutional Banking (CIB Area) provides a broad product offering aimed at both the largest Polish enterprises and medium-sized companies. The Custody 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 financing and risk management, including:

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

In addition, this area includes 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 and management of risks associated with the Bank’s offering of structured products.

Implementation of key strategic initiatives in 2025

INITIATIVE	New approach to the Customer leveraging the strength and potential of the Group
INITATIVE 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 global relationships and product platforms.
ACHIEVEMENTS	• increase in cross-sell with international Customers through sales activities aimed at decentralising market risk management competences • leveraging the BNP Paribas Group’s position and developing global relationships resulting in closer cooperation with international Customers

INITIATIVE	New approach to the Customer leveraging the strength and potential of the Group
KEY FIGURES	• increase in the volume of transactions made via electronic channels by international Customers (+6% year on year) • increase in NBI on transactions made via electronic channels by international Customers (+18% year on year)

INITIATIVE	New Customer service model
INITATIVE DESCRIPTION	Transformation of the sales area by providing Customers with the widest range of self-service solutions and ensuring centralised and dedicated post-sales service.
ACHIEVEMENTS	• 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	• increase in the number of active Customers in the FX Pl@net application (+4% year on year) • increase in the number of transactions in the FX Pl@net application (+12% year on year)

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 net interest income 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,
- current and structural liquidity of the Bank,
- structural currency risk,
- internal transfer prices for all deposit and credit 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 risk, liquidity risk and interest rate risk 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,
- balance sheet analysis,
- modelling and monitoring of liquidity risk and interest rate risk in 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 Customers’ 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 at 31 December 2025, the Bank maintained correspondent relationships with approximately 1,000 banks, including 52 NOSTRO accounts in other banks for 20 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 2025, 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 counterparties from these segments were signed, and steps were taken to introduce new agreements, in line with ISDA and ZBP recommendations.

Agreements with the National Bank of Poland signed in 2025:

- Agreement for opening and maintaining a “SORBNET3” bank account
- Term deposit agreement in PLN in the “SORBNET3” system
- Lombard credit agreement
- Technical credit agreement

Distribution channels

Sales network

As at 31 December 2025, the Bank had 355 Customer Centres (including 8 partner branches). The network of Customer Centres was complemented by 16 Wealth Management Centres.

In efforts to optimise the network in 2025, 8 Customer Centres were closed, including 3 partner branches.

In 179 Customer Centres (including 1 partner branch), 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 144 Customer Centres 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 2025, the in Corporate and SME Banking sales network comprised:

- Strategic Customers Division, organised within the head office, 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, divided into segments by revenue:
 - Commercial Customers: entities with revenues of PLN 80–600 million. Service for this group of Customers is provided through 9 Corporate Customer Centres located in key cities,
 - SME Customers: the sales network consists of a total of 15 specialised SME Customer Centres located in cities with the highest economic potential.

The sales network is complemented by specialised competence units. The SME and Corporate Customers Division includes the Sector Customers Department (servicing Customers from the agricultural sector and public sector entities) operating since January 2024 and the Digital Customers Office (dedicated to developing cooperation with Customers who prefer remote service through online and mobile banking channels).

This organisation of the sales network enables greater specialisation in servicing different Customer groups, which in turn improves the quality of products and services offered and ensures better alignment with the specific needs of Customers, particularly companies in the agricultural and public sectors.

The Bank’s business model for servicing SME and Corporate Customers is based on relationship banking. Its core principle is individual service and support provided by a Relationship Manager, who is responsible for the overall management of the Customer relationship and cooperation with the Bank. In addition, to fully meet Customer needs, dedicated specialist teams provide a high standard of sales and product advisory services, drawing on expertise in cash management, treasury, leasing, factoring, and trade finance 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

As at 31 December 2025, in the Retail and Business Banking Division, the Bank collaborated in the acquisition of banking products based on:

- outsourcing contracts - with 13 external outsourcing intermediaries, 1 outsourcing broker acting exclusively for the Bank and 7 franchise partners,
- marketing contracts - with 94 counterparties.

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

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

As at 31 December 2025, the Bank’s Customer Centres were operating 590 machines including:

- 589 dual-function devices handling contactless deposits and withdrawals with the Bank’s cards and using BLIK, as well as cash withdrawals using Google Pay and Apple Pay; and
- 1 ATM handling only standard withdrawals and transactions provided by the VISA and Mastercard systems.

In addition, 12 machines including 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 2025

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	• 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 • improving operational efficiency through the implementation of a New Operating Model supporting the Bank’s strategy, based on tools such as Kaizen, Problem Solving, Efficiency Boost (workload balancing), Competence Matrices, and performance dashboards that enhance process efficiency • implementation of a new tool for managing workflow, monitoring efficiency, and developing competences • development of AI-based solutions that streamline operational process handling and mitigate transaction risks (including credit, claims, insurance, AML) – classification and data extraction models for documents provided by Customers, increasing cost and resource efficiency • increased automation through the deployment of process robotics across the Bank, improving efficiency in retail, corporate, trade finance, compliance, and AML processes • implementation of a culture of continuous improvement, supported by the development of lean competences aimed at eliminating process redundancy • optimisation of the Bank’s product portfolio – reduction in the number of retail and corporate products • implementation of a tool supporting the procurement and accounting platform
KEY FIGURES	• increase in operational efficiency by 15% • 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) - 55% of multiskilling employees • 250 active robots, 35 new implementations in 2025 • optimisation of the product portfolio by 15%

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 Office.

BNPP TFI is authorised by the Polish Financial Supervision Authority to create and manage investment funds and as an intermediary in selling and redeeming shares of funds and foreign funds.

BNPP TFI cooperates with the Bank in the distribution of shares of funds offered by the Company, based on an agreement between the Bank’s Brokerage Office and the Company.

In 2025, the following significant events took place in the Company’s operations:

- increase of 26% year on year in net assets under management in investment funds managed by the Company;
- most popular sub-funds in the Company’s offering were:
 - BNPP Papierów Dłużnych Krótkoterminowych Skarbowych (net inflows of PLN 416 million), part of BNPP FIO ,
 - BNP Paribas Krajowych Funduszy Dłużnych Uniwersalny (net inflows of PLN 342 million), part of BNP Paribas Parasol SFIO ,
 - BNP Paribas Globalny Obligacji Zamiennych (net inflows of PLN 324 million), part of BNP Paribas Parasol SFIO, applying an ESG-based investment policy (in line with Article 8 of the SFDR),
 - BNPP Globalny Strategii Dłużnych Uniwersalny (net inflows of PLN 317 million), part of BNPP FIO, also applying an ESG-based investment policy (in line with Article 8 of the SFDR);
- net inflows in 2025 totalled PLN 1,524 million;
- as of the end of 2025, 30.6% of net assets under management in investment funds managed by the Company were allocated to sub-funds applying ESG-based investment policies (in accordance with the SFDR);
- on 5 May 2025, investment policy changes were introduced for the BNP Paribas Globalny Obligacji Uniwersalny sub-fund and the BNP Paribas Globalny Obligacji Zamiennych sub-fund in the Articles of Association of BNP Paribas Parasol SFIO managed by the Company;
- on 19 November 2025, net assets under management in the investment funds managed by the Company exceeded PLN 10,000 million.



As at 31 December 2025, the Company managed the following funds with a total value of PLN 10,318 million:

- BNP Paribas FIO – created in March 2016. This fund comprises 7 sub-funds (including two sub-funds applying an ESG-based investment policy) 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 2025 was PLN 1,609 million.
- BNP Paribas Parasol SFIO – there are 9 sub-funds within the fund, including 6 sub-funds applying an ESG-based investment policy. The value of the fund’s assets at the end of 2025 amounted to PLN 3,079 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 2025 amounted to PLN 5,052 million.
- BNP Paribas PPK SFIO – created to offer Customers employee capital plans, with 9 sub-funds (defined date funds). The value of the fund’s assets at the end of 2025 amounted to PLN 578 million.
- BNP Paribas Premium SFIO in liquidation – created in July 2014, with 4 sub-funds. The management of the fund was taken over as a result of the merger with Riviera TFI.
- FWR Selektywny FIZ in liquidation - created in May 2014, the management of the fund was taken over as a result of the merger with Riviera TFI.

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

PLN’000	31.12.2025	31.12.2024	change y/y	
			PLN’000	%
Total assets	57,389	48,992	8,397	17.1%
Long-term investments	540	509	31	6.1%
Equity, including:	44,985	38,886	6,099	15.7%
net profit	14,479	8,465	6,014	71.0%

BNPP TFI has share capital of PLN 16,692.9 thousand divided into 695,538 shares with a nominal value of PLN 24 each. Its equity as of 31 December 2025 amounted to PLN 45.0 million and is sufficient to safely conduct day-to-day operations.

The Company achieved a net profit of PLN 14.5 million in 2025 (PLN 8.5 million in 2024).

BNP Paribas Leasing Services Spółka z o.o.

BNP Paribas Leasing Services Sp. z o.o. (the Company), in cooperation with the Bank, offers a full range of leasing products for micro-enterprises, Personal Finance, SME and corporate Customers. 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.

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

PLN’000	31.12.2025	31.12.2024	change y/y	
			PLN’000	%
Total assets	7,162,288	7,207,866	(45,578)	(0.6%)
Long-term investments*	6,755,382	6,939,722	(184,340)	(2.7%)
Equity, including:	142,441	109,900	32,541	29.6%
net profit	32,534	25,741	6,793	26.4%

** receivables from granted financing*

The year 2025 brought a continuation of the sales challenges experienced in the previous year. The micro-enterprise segment delivered particularly strong results, achieving significantly higher sales compared with 2024. In Personal Finance, after a strong start to the year, the following months showed a noticeable slowdown in sales dynamics, although signs of recovery appeared toward year-end. In the Corporate and SME segments, sales volumes declined compared with 2024, while at the end of 2025 there were early signs of renewed activity in the Strategic Customers segment.

The portfolio of financed assets reached PLN 6.8 billion as at 31 December 2025 (a 3% year on year decrease), driven by lower sales volumes. In 2025, the Company concluded 19,800 new contracts with a total value of PLN 3,253 million (a 19% year on year decline in volume) and recorded a net profit of PLN 32,534 thousand, consistently increasing its equity base.

During the same period, the Company’s administrative expenses increased by 3% compared with 2024, which is below the inflation rate affecting personnel costs and external supplier expenses. Effective cost management continues to be supported by the Company’s strategy of improving operational efficiency. Credit risk in the portfolio remained stable, generating a financial impact below forecasts. Throughout 2025, the quality of the credit portfolio remained very strong.

Initially, the Company’s operations were financed by BNP Paribas S.A., 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 increased the limit to PLN 2.5 billion, followed by further increases to PLN 3.5 billion in July 2024 and to PLN 4.5 billion in August 2025. In July 2025, an agreement was signed with the European Investment Bank for a non-renewable credit line of EUR 200 million, planned for use in 2026.



Table 8. Financing structure of BNP Paribas Leasing Services Spółka z o.o. as at 31 December 2025

million	amount in PLN	PLN	EUR
BNP Paribas S.A.	3,623	1,390	528
BNP Paribas Bank Polska S.A.	2,635	2,511	29
BNP Paribas S.A. Oddział w Polsce	167	167	-
European Investment Bank	422	397	6

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. Key financial data of BNP Paribas Group Service Center S.A.

PLN’000	31.12.2025*	31.12.2024	change y/y PLN’000	%
Total assets	76,152	71,504	4,648	6.5%
Long-term investments	47,500	45,500	2,000	4.4%
Equity, including:	61,444	56,854	4,590	8.1%
net profit	4,590	4,123	467	11.3%

* unaudited



Pillar POSITIVE

Pillar description

The Bank wants to be a leader in sustainable finance by developing a portfolio of products and services for all business lines. The Bank’s aim was their dynamic sales, leading to an increase in sustainable finance. The target of 10% set in the GObeyond Strategy for 2025 was achieved in 2023 and at the end of 2025 the share was 14.6%. 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 use and implement responsible purchasing practices. By 2025, the Bank reduced CO₂ emissions from its operations by 61% (vs. 2019) and paper use by 60% (vs. 2019).

In relationships with Customers, the key factors included 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 Centres continued to be modernised in 2025 to cater to the special needs of seniors and people with disabilities. 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 transition.

The Bank continued its commitment to local communities in 2025 through the development of employee volunteering and further support of the initiatives of the BNP Paribas Foundation. The Bank initiated public debate, provided educational activities, and established 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 2025
Share of sustainable financing [vs. 2021: 4.5%]	10%	14.6%
Share of sustainable assets under management [vs. 2021: 5%]	30%	32.1%
Social commitment of employees (annual average per employee)	4h	2h 40 min
Customer Centres with the "Barrier-Free Facility" certificate (excluding partner establishments) [vs. 2021: 18%]	50%	41,5%
Reduction in CO ₂ emissions from operations [vs. 2019]	55%	61%
Reduction in paper consumption (based on paper purchase rate, in tonnes) [vs. 2019: 439.3t]	-80%	-60% (176.9 t)

Sustainable financing

The Bank was committed to offering responsible and sustainable products that have a positive impact on the environment. The Bank wanted to contribute to the energy transition and the dissemination of solutions that foster environmental protection and climate change mitigation. More information on the Bank’s actions is presented in the Sustainability Report, section [Climate change \(ESRS E1\)](#). With its offerings, the Bank wanted to support entrepreneurship development and social innovation. In 2025, the Bank focused on further developing sustainable products, conducting training for Customer Advisors and information activities for Customers to promote sustainable financing.

The total value of sustainable financing (total sustainable loans and advances, in line with the assumptions described above as per the Bank’s internal classification) as at 31 December 2025 was 13.6 billion, representing 14.6% of the total gross credit portfolio measured at amortised cost (the total gross credit 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 2025).

Table 10. Value of sustainable financing provided by the Bank

PLN million	2025	2024	change (%)
with a positive environmental impact	9,083	6,353	43.0%
with a positive social impact	297	471	(36.9%)
ESG Rating-Linked Loans	538	468	15.0%
Sustainability-Linked Loans	3,660	2,866	27.7%
Total	13,578	10,158	33.7%

Table 11. Value of financing with positive environmental impact

PLN million	2025	2024	change (%)
renewable energy	2,107	1,500	40.5%
green building	4,755	2,727	74.4%
thermo-modernisation of buildings	1,214	1,220	(0.5%)
improving the energy efficiency of production processes	169	151	11.9%
low-carbon transport	416	108	285.2%
circular economy	353	212	66.5%
wastewater and water treatment	42	237	(82.3%)
natural resources and biodiversity	27	198	(86.4%)
Total	9,083	6,353	43.0%



Financing with a positive environmental impact includes the following projects:

- renewable energy, including above all onshore and offshore wind farms as well as PV farms,
- energy-efficient construction, whose demand for primary energy is 10% lower than the threshold defined for nearly zero-energy buildings,
- thermal modernisation of buildings, which reduces primary energy demand by 30% and is linked to the installation of energy-efficiency enhancing equipment or renewable energy technologies,
- improving energy efficiency of production processes – e.g., replacing machinery and technological lines with equipment that consumes at least 30% less energy,
- low-carbon transport – electric vehicles and charging stations, energy-efficient public transport, rail transport, and the production of components, parts, and equipment for low-carbon mobility,
- circular economy – use of circular materials, product design aimed at reducing material consumption or increasing durability, modularity enabling repair and recycling, and activities supporting selective waste collection and recycling,
- efficient wastewater and water treatment – including initiatives supporting resource-efficient water supply and sewage treatment,
- protection of natural resources and biodiversity, including mainly sustainable agriculture practices confirmed by recognised certificates such as EU Organic.

Table 12. Value of financing with positive social impact

PLN million	2025	2024	change (%)
preventing social exclusion	9	4	112.5%
health protection	115	349	(67.0%)
education	172	75	129.3%
basic infrastructure (e.g. water supply, sewerage)	2	43	(96.5%)
Total	297	471	(36.9%)

The area of financing with a positive social impact includes projects that, among others:

- prevent social exclusion, i.e., support the creation of jobs for vulnerable groups, prevent unemployment, and promote entrepreneurship
- relate to healthcare, in particular activities of the public healthcare system and the production of equipment supporting the mobility of persons with disabilities
- support the operations of public educational institutions

Since 2020, the Bank has been offering more attractive pricing for sustainable products, which significantly strengthens the competitiveness of the offering. To this end, the Bank has introduced a formal catalogue of products and types of investments with a positive environmental impact for individual Customer segments.

The classification of a loan as compliant with the Bank’s internal sustainable-finance methodology is verified by the ESG competence unit and subsequently approved by credit decision-makers.

Financing linked to Sustainable Development

Sustainability-Linked Loan (SLL)

A Sustainability-Linked Loan (SLL) is a general or investment purpose financing in which the loan margin is partly linked to the achievement of the company’s defined ESG objectives. Sustainability-Linked financing is provided according to the LMA Sustainability-Linked Loan Principles. 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 in 2025:

- **Syndicated loan for the Woodeco Group** (a producer of wood-based boards) with a total value of EUR 155 million. Woodeco Group and the Bank, acting as Sustainability Coordinator, jointly agreed on a set of indicators, including: reduction of direct greenhouse gas emission intensity, increased use of recycled wood raw material in chipboard production, ESG-based supplier assessments, and improvement of the company’s EcoVadis ESG rating.
- **Financing for the Iglotex Capital Group in a bank consortium** with a total value of PLN 84.9 million (BNP Paribas share: 50%). The funds may be used to finance investments in automation at the Skórcz plant, improve efficiency and reduce emissions at the Tarnów facility, and partially support ownership decisions related to the Group’s development. The Bank, acting as Sustainability Coordinator, supported the Customer in defining ambitious ESG targets: reduction of CO₂ emissions in Scopes 1 and 2 in production activities, reduction of CO₂ emission intensity in Scopes 1, 2 and key categories of Scope 3 in distribution activities, and improvement of the EcoVadis ESG rating.

ESG Rating-Linked Loan

An ESG Rating-Linked Loan is a general purpose or investment loan in which the margin is partially linked to the improvement of the borrower’s ESG rating. 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 in 2025:

- investment loan for **Młyny Kapka Sp. z o.o.** (a family-owned company producing flour for corporate clients and the retail market) amounting to several dozen millions of PLN for the construction of a grain mill together with equipment,



- loan for **Job Impulse Polska** (one of the leading temporary employment agencies, specialising in recruiting and hiring workers, including foreign nationals, for the industrial, logistics and services sectors) in the amount of PLN 15 million.

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.

BNP Paribas Faktoring Sp. z o.o., in cooperation with the Bank, signed an agreement with Raben Logistics Polska Sp. z o.o. for the amount of PLN 140 million. The indicators applied in the transaction relate to the highest standards of carriers’ truck fleets, the calculation of carbon footprints by carriers, and the provision of information by carriers regarding their sustainability policies and practices. This transaction was awarded in the PolSIF Award competition in the category of Best Sustainability-Linked Financing.

Green Loan

Green Loans are loans 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 nearly zero-energy buildings. 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 in 2025 :

- Financing of EUR 31 million granted to the **Polish Logistics (UK) LLP structure managed by REINO IO Logistics**, whose investors include Grosvenor DPI, REINO Capital and IO AM. The investment will feature high energy efficiency, meeting the technical criteria of the EU Taxonomy and achieving a BREEAM certification at the “Excellent” level.
- Financing of EUR 33.5 million for **Accolade**, a company developing the modern logistics park Park Szczecin Trzebusz. The investment will feature high energy efficiency, meeting the technical criteria of the EU Taxonomy and achieving a BREEAM “Excellent” certification. The financing was granted on the basis of Accolade’s Green Finance Framework, whose alignment with the Green Loan Principles and the EU Taxonomy was confirmed by Sustainalytics.

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. The Bak finances micro RES installations as well as mid- and large-scale RES projects.

Cooperation with banks

ELENA (European Local Energy Assistance)

Until the end of July 2025, the Bank continued its cooperation with the European Investment Bank (EIB) under the ELENA Programme, which supports energy efficiency improvements for SMEs (small and medium-sized enterprises) and MidCAP companies (entities with more than 250 and fewer than 3,000 employees) – ELENA EEFFCB. Nearly 600 SME/MidCAP companies were covered by the support programme, carrying out energy efficiency investment projects with a total value exceeding PLN 350 million.

Beneficiaries of the programme received 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.

InvestEU guarantees from the European Bank for Reconstruction and Development (EBRD)

On 12 May 2025, the Bank concluded a portfolio guarantee agreement (a risk-sharing instrument) with the European Bank for Reconstruction and Development (EBRD) under the InvestEU Green Portfolio Guarantees programme.

The beneficiaries are individuals – the Bank’s retail Customers – and the guarantee covers loans for the purchase and installation of photovoltaic micro-installations, energy storage systems, heat pumps, and electric bicycles. The Bank also received technical assistance from experts in implementing this instrument.

Thanks to this agreement, the Bank will grant loans totalling up to EUR 100 million within three years from the date of signing the agreement.

InvestEU guarantees from the European Investment Fund (EIF)

After signing in 2024 a portfolio-guarantee agreement with the European Investment Fund (EIF) under the InvestEU Fund for up to EUR 105 million, in 2025 the Bank made InvestEU-supported products available to Customers. The agreement is intended to increase the availability of financing for sustainable investment projects for startups and scaleups, micro, small and medium-sized enterprises, small mid-cap companies, and housing associations in Poland. Based on the guarantee, the Bank plans to provide up to EUR 160 million (approximately PLN 688 million) in new debt financing over a period of three years. The EIF covers between 50% and 80% of potential losses in the created portfolio.

Preferential loan under the European Funds for Silesia 2021–2027 programme

In October 2025, the Bank signed an Operational Agreement with the European Investment Bank (EIB) concerning the Financial Instrument under the European Funds for Silesia 2021–2027 programme.

Under the agreement, the Bank acts as a financial intermediary providing access to funds designated for preferential loans. The offer will be directed to Customers carrying out investments in the Silesian Voivodeship aimed at improving the energy efficiency of public use buildings, residential buildings, and enterprises. The loans will feature favourable interest rates for Customers and the possibility of up to 30% principal forgiveness. Launch of the offer is planned for 2026.



Loans granted in cooperation with Bank Gospodarstwa Krajowego (BGK)

Loans for the implementation of ecological investments leading to a reduction of primary energy consumption by at least 30%:

- **Green Loan** - 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 2025, there were two editions of the Green Loan 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.

Sustainable financing offer for retail Customers

Offer	Implementation in 2025
Instalment loan to finance green energy sources	• more than 1,700 projects financed (mainly related to photovoltaics and heat pumps), with a total loan volume of over PLN 60 million • continued cooperation with market-leading RES companies with the offer of instalment loans dedicated to the energy transition
Credit for Green Change	• over 6,000 loans in a total amount of nearly PLN 300 million (+35% year on year) • enabling the financing of zero-emission cars, electric scooters and e-bikes, as well as home charging stations for electric vehicles
Green Mortgage	• over 1,500 mortgage loans in a total amount of over PLN 760 million • attractive loans for green homes - 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)
Financing of low-emission vehicles	• redefinition of the designation of car loans as green: from 2024, this includes only loans financing PHEV, electric and hydrogen drives; from 2026, only zero-emission vehicles (electric or hydrogen-powered) will be covered by the definition of “green” • financing, in cooperation with dealers and second-hand car dealers, of 680 low-emission vehicles for an amount of ~PLN 61 million • promoting the NaszEauto programme through the product offering as well as informational and educational materials

Supporting Customers in sustainable transition

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 Transition

The Bank has a team of engineers who provide expertise to the Bank’s existing and prospective Customers 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. The experts also identify potential for sustainable financing such as the Green Loan, Ekomax Loan, SLL, ESG RLL or the Decarbonisation Loan. Their role is also to present the offer while highlighting the benefits that such financing provides.

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 promotion of such loans and coordinated loan transactions are in strategic dialogue with corporate Customers on sustainable business transition, regulatory requirements and ESG challenges in supply chains. In 2025, the Bank continued its collaboration with EcoVadis, an agency specialising in ESG rating.

Business meetings

In 2025, the Bank conducted a series of “Business Dinners” and “Business Lunches” with entrepreneurs, inviting both existing and prospective Customers. The events were held in seven locations across the country. Bank experts discussed a range of important topics related to corporate decarbonisation, sustainable financing, EU funds, and ways to improve energy efficiency.

The Bank was also the main partner of the 25th anniversary of the Responsible Business Forum. The Workshop Day titled “ESG in the value chain – a shared path for Customers, Suppliers and the Bank” took place at the Bank’s headquarters. The meeting was co-hosted by experts from the Technical Expertise Team for Energy Transition.

Cooperation with Envirly

In 2025, the Bank continued its cooperation with Envirly, the provider of a platform for measuring and managing carbon footprint and ESG reporting. For business Customers in the Micro and SME segments, the platform is made available free of charge for measuring environmental impact in Scopes 1 and 2. The tool enables Bank Customers to calculate their carbon footprint in line with international standards (GHG Protocol, ISO 14064-1), generate data for non-financial reporting, and support the implementation of decarbonisation strategies.



An important element of the cooperation involves activities aimed at building awareness and expanding knowledge among the Bank’s Customers in the areas of climate transition, carbon footprint measurement, and the use of ESG data. These activities include participation in industry events and the organisation of expert meetings where the Envirly tool and market best practices are presented. Such initiatives help Customers better understand regulatory requirements, identify emission reduction opportunities, and make informed business decisions.

These initiatives strengthen the Bank’s position as a leader in the provision of non-financial services, particularly in the areas of ESG and climate transition, fully aligned with the Bank’s strategy.

Educational activities in support of Business Advisers

In order to guarantee the best service in the area of sustainable financial products, in 2025 the Bank:

- delivered training and consultation sessions to Advisors serving Business Customers,
- conducted the second edition of the ESG Development Academy in Business Banking, completed by 50 advisors,
- conducted the second edition of the Agro Academy in Business Banking, completed by 70 advisors; part of the programme was dedicated to topics related to regenerative agriculture and carbon footprint,
- together with the Warsaw Banking Institute, an organisation specialising in financial education, continued the Level II certification "Professional Business Advisor to Companies - Level II".

As part of this training, more than 550 Business Banking Advisors expanded their knowledge on topics such as sustainable financing and available European programmes to support business development.

Support for regenerative agriculture

The Bank, in cooperation with Klim GmbH – a European leader in decarbonising supply chains in the food sector – supports agro-food companies and their suppliers in transitioning to regenerative agriculture and preparing for new ESG reporting requirements. As part of the partnership, the Bank developed an ESG guide for companies in the food sector, while Klim GmbH provides comprehensive support in reducing Scope 3 emissions through cooperation with raw material suppliers and the implementation of regenerative practices at farm level.

The Bank plans to further develop its cooperation with Klim GmbH by offering Customers SLL solutions based on decarbonisation indicators and supporting farmers in accessing more favourable financing conditions, facilitating their transition to regenerative agricultural practices. More information about Klim GmbH’s offering and the environmental impact of regenerative farming practices is presented in the Sustainability Statement, section [Actions and resources in relation to climate change policies \(E1-3\)](#).

Activities to support Customers in the Food & Agro sector

The BNP Paribas Group has extensive international experience in servicing the Food & Agro sector, including as the European leader in agricultural machinery lease 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, it 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 2025, 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, and Food&Agro Sonar videos with news from bank analysis on the food & agro industry.

In 2025, more than 209,000 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, working groups set up by the Ministry of Climate and Environment as part of the Implementation of Industry Agreements, and groups set up by the Ministry of Agriculture and Rural Development. At the same time, the Bank continued its cooperation with the Polish Sustainable Agriculture and Food Association (ASAF) and its member companies. Educational initiatives were launched for women in the Agro sector in collaboration with the Innovation Leaders Association.



Solutions for selected groups of Customers in the Retail and Business Banking segment

Samodzielniak Account

Since 2020, the Bank has an offer aimed at parents, the Samodzielniak 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 2025, the Bank was operating more than 86,000 Samodzielniak Accounts 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 options that facilitate the use of banking products. At the Bank, Ukrainian citizens can easily open an Otwarte na Ciebie Account or a Konto na Teraz Account for 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.

In 2025, more than 35,000 personal accounts were opened with the Bank for Ukrainian citizens, bringing the total to 204,000.

Otwarte na Biznes Non-Profit Account

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

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

- current account in PLN,
- investment account,
- term deposit accounts,
- debit card,
- access to mobile and online banking systems,
- comprehensive support by a Banking Advisor,
- preferential terms for additional services,

The number of Non-Profit Otwarte na Biznes Accounts (Non-Profit Package) in 2025 was 46,800.

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

- The Bank, through its retail partners, makes it possible to take advantage of electronics rental in a new sales channel - in selected online shops, including iSpot.
- The Bank works with the fintech Plenti, which specialises in equipment rental offers. Previously, this company 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 means less electronic waste and environmental burden.

mamGO Mobility Platform

mamGO is a marketplace built for collaboration between the Group and car dealers. The platform features offers from dealers and vendors from all over Poland, and the Bank provides financing for the purchase with a loan, lease 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, where the user can broaden their knowledge of electric cars.

As part of mamGO, the 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 Electric Vehicle programme.

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

Investing based on ESG criteria

The Brokerage Office provides Customers with sub-funds of investment funds managed by BNP Paribas TFI S.A. At the end of 2025, there were 9 sub-funds on offer that included ESG factors according to the SFDR classification (Article 8 or Article 9).

The Brokerage Office also offers the sale of shares of funds run by various TFIs. Among these are 527 funds designated as balanced funds (Article 8 and Article 9 of the SFDR).

According to legal requirements, 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 Office’s procedures use an assessment of instruments (shares, bonds, ETFs) based on the BNP Paribas Group methodology.

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

Investment products in support of social and environmental objectives

Selected structured certificates in the Brokerage Office’s offering are issued under the Green Bonds Principles standard, which means that the net proceeds of the issue are reallocated in whole or in part to 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 integration of sustainability risks into the business. In particular, this includes 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 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 Europejskich Obligacji Zamiennych,
- BNP Paribas Globalny Obligacji Uniwersalny,
- BNP Paribas Akcji Wzrostowych USA,
- BNP Paribas Akcji Azjatyckie Tygrysy,
- BNP Paribas Akcji Światowych,
- BNP Paribas Akcji AQUA,
- BNP Paribas Globalny Akcji,
- BNP Paribas Globalny Stabilnego Wzrostu,
- BNPP Globalny Strategii Dłużnych Uniwersalny.

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.](#)).

Key data on ESG investments and risks are included in the funds’ prospectuses, where all investment aspects are described in detail, including ESG specifics.

Positive banking

Customer relations

The foundation of the Bank’s business is to build lasting relationships with its Customers based on transparency, integrity, 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 Customers. For more information on Customer relations, see Consumers and end-users (ESRS S4).

Accessibility

The Bank creates an ecosystem of solutions that provide every Customer with equal access to banking and utmost comfort and simplicity of use.

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 buildings 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 seniors and people with young children.

Key achievements in 2025:

- 144 Customer Centres and the Bank’s Head Office building in Warsaw with the “Barrier-Free Facility” certificate,
- 195 Customer Centres with induction loops,
- 529 sign language interpreter calls - call time 25 hours.

Our accessibility initiatives are described in more detail in the section [Consumers and end-users \(ESRS S4\)](#).

Plain language

The Bank simplifies communication with Customers and formal documents in line with the Polish Accessibility Act. The Bank employs 70 plain-language consultants: trained staff who simplify formal documents, product and service information, messages, SMS communications, marketing texts and other materials addressed to Customers.

The Bank also offers employees training on the basic principles of plain language through an e-learning platform, with more than 340 participants in 2025, as well as traditional in-person training sessions. In 2025, the Bank organised the “Plain Language Day” conference for employees for the third time.

Representatives of the Bank participate in the working group on plain banking communication at the Polish Bank Association. The Bank is a signatory of the “Agreement on the Standard of Language Clarity in Retail Banking Services”.



Addressing social and environmental themes in communication

Pupil (My Pet) Card

Pupil (My Pet) Card is the first debit card in Poland designed for animal lovers, introduced by the Bank.

For many people, a dog or a cat is more than a four-legged companion – it is a member of the family. According to research, as many as 52% of Poles take care of a dog or a cat, and spending on pet care is becoming a significant part of household budgets. With pet owners and their everyday needs in mind, the Bank became the first in Poland to launch the Pupil (My Pet) Card – a Mastercard debit card offering numerous benefits that combine the convenience of everyday payments with real advantages for dog and cat owners. In mid-September, the media campaign “It must be love” was launched, promoting the new product along with attractive promotions and discounts, including veterinary packages, pet-care purchases and other services useful for animal guardians.

In addition, together with Customers and the BNP Foundation, the Bank donated approximately PLN 270,000 to the Ratujemy.pl Foundation. Our Customers contributed PLN 133,000 through charity transfers, and the Bank doubled this amount.

Mission Education and other educational initiatives

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. This social campaign includes two thematic modules: Pocket Mission and Saving Mission, which fill 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. In September 2025, workshops were added to the project, combined with volunteering for primary school d VII and VIII. The project is dedicated to educators of children in primary school grades I-VIII and parents.

During the 2021-2025 campaign, 27,400 pupils from local kindergartens, primary and secondary schools participated in financial education lessons delivered by the Bank’s staff and 3,400 teachers were involved.

Throughout the year, educational activities addressed to our Customers were carried out. As part of these initiatives, we delivered educational communication focused on personal finance topics. We covered issues such as building healthy financial habits, financial security, effective household budget management and preparing for periods of increased spending – holidays, Back to School, Black Friday and December holiday expenses. The aim of these activities was to increase Customers’ financial awareness and support them in making responsible and well-informed financial decisions.

In parallel, we conducted social impact communication encouraging Customers to participate in charitable initiatives. The Bank informed them about campaigns such as pet food collections, support for the education of refugee children, the Szlachetna Paczka initiative and the “Share Help” campaign. These activities aimed to promote pro-social attitudes and build Customer engagement in helping those in need.

Housing communities – thermal modernisation

In 2025, the Bank actively participated in a series of 31 nationwide conferences dedicated to property managers and housing communities, organised by the Polish Institute for Market Development. These events gathered nearly 2,500 participants, becoming one of the most important knowledge exchange platforms in the sector. In addition, the Bank organised and took part in numerous meetings for local associations and organisations, supporting investment development and expanding the knowledge of community managers and interested stakeholders in the area of improving energy efficiency.

Key educational role

Presentations delivered by the Bank’s representatives were primarily educational and advisory. Bank experts acted as guides through the complex process of energy transition in multi-family buildings. The main objective was to equip managers with practical, substantive knowledge enabling them to carry out investments safely and effectively in 2026.

Comprehensive support for housing communities

During the presentation “Thermal modernisation and renewable energy investments – financing for housing communities”, the Bank presented comprehensive building modernisation strategies, with particular emphasis on:

- BGK loans with thermal modernisation and renovation bonuses: a detailed explanation of the rules for obtaining subsidies that significantly reduce the amount of capital to be repaid, which is crucial for protecting residents’ renovation funds
- RES grant loans: an overview of the benefits of installing photovoltaic systems and other renewable-energy solutions, supported by grants covering a significant share of investment costs
- diversification of financing sources: education on combining different financial instruments, including funds from the National Recovery Plan, to achieve the lowest possible cost of modernisation

By participating in these conferences, the Bank provided meaningful support to nearly 2,500 professionals across Poland, equipping them with tools necessary to address rising energy costs and improve living standards for residents.

Education and support for the development of SMEs and Corporate Customers

In 2025, the Bank consistently supported the education of business Customers from both the SME and Corporate segments in key areas of development. It organised webinars and educational activities dedicated to market, regulatory and technological changes, EU funding, energy efficiency and cybersecurity, supporting responsible, safe and sustainable business growth.

The Bank carried out activities including:

- a cybersecurity webinar for companies, supporting awareness building in the area of data protection and digital risks,



- webinars and informational as well as promotional activities under the GO4founds programme, covering available EU funds, effective application processes, call-for-proposal rules and preparation of investment projects,
- a webinar on regulatory changes related to the National e-Invoicing System (KSeF), helping companies prepare for new reporting obligations and the digitalisation of financial processes,
- continuation of the article series in the ESG Forum of “Rzeczpospolita”, addressing topics related to financing the transition, regenerative agriculture and decarbonisation,
- expert articles and media commentary, as well as participation in Customer meetings covering business development topics and product solutions supporting companies’ daily operations,
- participation in a debate on sustainable business transition.

These activities aimed to educate Customers and support the responsible, long-term development of enterprises.

#WPŁYWOWI

In 2025, the initiative launched the previous year continued, encouraging residents of Poland to create a grassroots system for collecting information on water cleanliness. By the end of 2025, we had distributed more than 10,000 floats. The 7th edition of the rewards campaign is already underway. Measurements using the floats are now being taken worldwide – the map with nearly 7,000 current measurements is available in the Aguard app. The topic of water cleanliness and the Bank’s role was presented during this year’s Green Film Festival in Kraków.

Agroabsolwent Competition

The Bank continues its competition for the best thesis on modern agriculture, sustainable food production and the agro-food industry. In 2025, we concluded the 7th edition of the competition. Its aim is to promote topics related to progress, innovation and the development of agro-business. The awarded works present ideas for modern, environmentally friendly activities in rural areas and agro-related enterprises, focusing on ecological practices, sustainable agriculture and ESG.

Between 2019 and 2025, the competition attracted 293 students, more than 20 universities and 16 Partners.

Community involvement

The Bank has remained committed to local communities for years. In line with the POSITIVE pillar of the GObeyond strategy 2022-2025, the Bank aimed to have a positive impact on the social and natural 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 field of social exclusion, climate change and promoting diversity,
- education programmes - equal 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	• Employee volunteering programme • Individual philanthropy programme I support you all year round • Competition for Volunteering Projects • The Szlachetna Paczka campaign • Action Good kilometres • Action Two Hours for Earth • Bank’s Local Ambassador Programme • Local Grant Programme
Initiatives targeting external stakeholders	• Scholarship and development programme Class • MOGE programme • Dream Up education programme • Programme of Encounters with Music with the National Philharmonic Orchestra • Rest Home for Young People Project with the OFFschool Foundation • My Future Scholarship Programme with Our Home Society



- Actions for refugees
- Knowledge to Power tutor and scholarship programme with the Ocalenie Foundation
 - Charitable donation to the Ocalenie Foundation
 - Grassroots volunteering initiatives

- Environmental philanthropy
- 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

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 24 fully paid hours available for volunteering per year. 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 you all year round

Operating since 2017, the “I support you all year round” programme is a simple tool for voluntary salary deductions. Regular contributions help NGOs plan their long-term activities. In 2025, just like in 2024, people working at the Bank chose to support the Stonie na Balkonie Foundation and the Projekt Starsi Foundation. 422 people participated in the programme. The financial support totalled over PLN 380,000 (including PLN 190,000 from programme participants and PLN 190,000 from the BNP Paribas Foundation).

Competition for Volunteer Projects

The Volunteer Projects Competition has been a key element of the Bank’s employee volunteering programme for 12 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 2025:

- 60 completed projects,
- 307 employees involved,

- 5,460 beneficiaries,
- 2,456 hours worked,
- over PLN 280,000 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 11 million. The BNP Paribas Foundation runs the largest organised employee volunteering campaign among companies for the beneficiaries of the Szlachetna Paczka. In 2025, 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, the Foundation and Customers, in 2025 the Szlachetna Paczka received support of nearly PLN 2 million.

Szlachetna Paczka in 2025:

- 115 people working in the Bank and Group companies were leaders of the Szlachetna Paczka,
- 136 families in need received parcels prepared by our volunteers,
- 2,185 volunteers from the Bank and Group companies,
- PLN 1,500 subsidy for each parcel from the BNP Paribas Foundation.

Dobre kilometry

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.

Dobre kilometry in 2025:

- 214,508 kilometres covered,
- PLN 70 thousand donated to the Stonie na Balkonie Foundation,
- 1,200 people involved.

Two hours for the Earth

In April 2022, the Bank joined the celebrations of International Earth Day. On the grassroots initiative of employees with the support of the BNP Paribas Foundation, the Two Hours for Earth campaign is organised annually. Our volunteers, together with their relatives and colleagues, dedicate this time to cleaning green areas together. In 2025, 131 employees from all over Poland participated in the action.



2,185

Group volunteers involved in the Szlachetna Paczka campaign

26,602

hours dedicated to social engagement

422

employees participating in the individual philanthropy programme “I support you all year round”

3,600

hours worked for local communities 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 low income. The scholarship enables students to attend good general secondary schools in six academic cities in Poland. Participants receive full financial support during their secondary 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 Class programme.

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

Scholarship and development programme Class in numbers:

- support for 897 graduates from 540 towns and villages (since 2003),
- 52 scholarships in the school year 2025/2026.

MOGE programme

MOGE is a programme that develops key competences essential for development (self-confidence, communication, collaboration, taking on challenges, learning from mistakes, etc.) and provides young people with the support of wise adults and peers, enabling them to discover and realise their potential. The programme is operated by the Civic Education Centre Foundation. In 2024, its first pilot edition took place, involving 80 children.

MOGE in 2025 :

- 120 children in individual tutoring,
- 12 adventure groups,
- 2 summer camps.

Knowledge to Power tutoring and scholarship 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, the foundations launched the joint scholarship and tutoring programme Knowledge to Power, which helps children from refugee families find their way in the Polish education system and supports 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 has been a strategic partner of the Ocalenie Foundation.

In 2025, in addition to the standard activities within the programme – such as regular meetings with tutors, tutoring sessions, and educational or developmental events and outings – additional initiatives were undertaken to raise public awareness about refugees and migration. The exhibition of works created by programme participants, titled “Dreams Without Borders”, was presented in the autumn and remained on display for a month at the Warsaw City Library. The exhibition of works created in 2024, titled “My Place on Earth”, was showcased again in the publicly accessible space of the BNP Paribas Bank headquarters. It not only helped raise awareness among employees and visitors but also supported fundraising efforts, including a charity transfer campaign involving Bank employees and Customers, which resulted in a total of PLN 130,000 in additional support for the programme’s objectives.

Knowledge to Power in 2025:

- 100 young people participating in the programme (from 2018 - 220 people, many have been in the programme for several years),
- 29 scholarships awarded - 19 academic and 8 aid,
- 71 committed volunteers.

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 Foundation 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 and emotional competences, building confidence in oneself and one’s abilities, and discovering passions.



In 2025, the BNP Paribas Foundation cooperated with the “For the Earth” Association as part of the fourth edition of the programme (ongoing since September 2024). The Dream Up programme supported activities for girls from refugee background families who form the Girls’ Drumming Group.

Dream Up in 2025:

- 12 programme participants,
- 114 hours of music workshops,
- 6 concerts on local stages during major events and celebrations, such as the Grand Finale of the Great Orchestra of Christmas Charity, World Refugee Day, International Day of the Girl, as well as at festivals including the Two Riversides Film and Art Festival, the Folkowisko Festival, and on local radio

Rest Home for Young People

In September 2023, the BNP Paribas Foundation became a strategic partner of the Rest Home for Young People programme initiated by the OFF School Foundation. This is a programme in which secondary school students act as agents of change and lead activities with their peers, based on scenarios prepared by experts and organisations.

The programme developed scenarios in seven thematic areas proposed by young people, including mental health, social and civic engagement, finding one’s way in the labour market and artificial intelligence. We prepared a section dedicated to financial education, which expanded the offer with six lesson plans focused on this topic. The project website has been visited by nearly 90,000 people and the lesson plans have been downloaded more than 47 thousand times.

In 2024, the nationwide Rest Home for Young People - Home on Tour was launched to explore the real needs of young people through dialogue involving them personally. The campaign was conducted in 10 towns in 2025. A “School of Dreams” study was carried out, and its results were compiled into a report and submitted to the Ministry of National Education. In 2025, another research project was launched, “School in Dialogue”, aimed at gathering insights into the quality of intergenerational communication between students and teachers.

Encounters with Music

Since 2003, the BNP Paribas Foundation has cooperated with the National Philharmonic, and since 2011, it has been a partner of the Encounters with Music concert series. These are “music classes”: mini-concerts accompanied by a narrative which 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 home, in schools, kindergartens and community centres in smaller towns and cities in several regions of Poland in order to increase access to high culture where it is difficult.

Encounters with Music in 2025:

- 1,498 educational concerts,
- over 260,000 people attending concerts,
- around 90 towns and 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-based and institutional forms of foster care, as well as independent alumni. Participants can receive financial support to be used for their needs and passions in the amount of up to PLN 4,000 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. The committee selected 80 scholarship winners. In 2025, the Society received a PLN 100,000 grant from the Bank and PLN 20,000 from the BNP Paribas Foundation. The Bank has been involved in providing assistance since 2008.

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 2025, the BNP Paribas Foundation was a partner in three initiatives:

- **Re:Generation** (in partnership with the UNEP/GRID-Warsaw Centre) – protection of peatland ecosystems in the Biebrza National Park, in the Bagno Ławki area. The active conservation measures will improve hydrological conditions across an estimated area of around 6 hectares, which will also generate a climate benefit – increasing peatland moisture will reduce carbon dioxide emissions resulting from peat mineralisation, and if optimal moisture levels are achieved, it may even enable CO₂ uptake from the atmosphere. An additional effect expected over the next few years is the improvement of habitat conditions for rare animal species, which will positively influence the level of biodiversity in the area.
- **Eternal Forests** and **Microreserves** (in partnership with the Natural Heritage Foundation) - as part of the “Eternal Forests” project, we have protected 2 ha of forest in the Biebrza National Park buffer zone, which, by creating a carbon storage 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 proposed for the lesser spotted eagle – a rare animal species found in an ecologically valuable region in southern Poland.
- **Social Organisations for the Climate** (in partnership with the Donors Forum in Poland) – as part of an initiative bringing together NGOs from across the country, more than 10 educational events were held to increase climate awareness: expert workshops, networking meetings with experience sharing sessions, and webinars. In addition, member organisations could benefit from individual consultations. A guidance document, “Climate Compliance”, co-created by member organisations, was also published, offering a range of recommendations for climate-friendly organisational management. The online knowledge base was continuously expanded, and progress in implementing the Social Organisations for the Climate Declaration was monitored. In 2025, 13 new organisations joined the initiative, bringing the total number of signatories to 63.



Actions for refugees

In 2025, the BNP Paribas Foundation continued its support for refugees, including individuals affected by the armed conflict in Ukraine.

Organisations working for refugees, people on the move, and minority groups, including cultural minorities, faced a significant funding crisis in 2025, linked, among other factors, to the decision of the United States to suspend financing for the United States Agency for International Development (USAID) and the resulting consequences in Poland. In response to this situation, the BNP Paribas Foundation provided financial support totalling PLN 400,000 to five organisations, which independently decided how to allocate the funds according to their current priorities. This flexible support model responds to the real needs of the NGO sector and represents an important alternative to grant programmes with a limited scope of activities.

The following organisations received support:

- Polish Migration Forum Foundation – supporting foreigners in Poland through psychological, legal, professional and educational assistance,
- “Ukrainian House” Foundation – helping people with migration experience from Ukraine by offering legal, psychological and integration support,
- “For the Earth” Association – supporting refugees in centres for foreigners and conducting global and environmental education,
- Towards Dialogue Foundation – supporting Roma communities in Poland and combating discrimination,
- Lepszy Świat Association – implementing activities in the areas of human rights, global education and social assistance.

The BNP Paribas Foundation also actively participates in the international Tent Partnership for Refugees initiative, which aims to support people with refugee backgrounds in entering the labour market. In 2025, the BNP Paribas Foundation became a partner of a mentoring programme dedicated to women from Ukraine who are rebuilding their lives in Poland. As part of the programme, 22 employees from the Bank and the BNP Paribas Foundation – mainly from management and HR teams – served as mentors, offering participants individual support in developing professional competences, building networks, navigating a new work environment and preparing to take up employment aligned with their skills.

Actions for local communities

Local Ambassador Programme

The Bank’s Local Ambassadors are a community of more than 150 people. The Bank’s employees have been active in their local communities since 2018 and support foundations, associations and schools with grassroots initiatives. In 2025, they worked a total of 3,600 hours (over 43,000 hours since 2018).

Local Grants Programme

The Local Grants Programme, one of the Bank’s most important social initiatives, allows us to support local communities and NGOs. We particularly support activities that:

- minimise the social exclusion of children and young people from difficult backgrounds, seniors, and people with disabilities,
 - are directed towards the support and integration of refugees,
 - serve to protect the environment and animals.
- During the 15 editions of the Local Grants Programme to date, the Bank has awarded more than 1,100 grants worth more than PLN 4 million.

Local Grants Programme in 2025:

- 100 grants for local community organisations,
- PLN 500,000 earmarked for grants.

Donations and sponsorship

Donations

Donations made by the Bank support civic development and activity, enhance the quality of life of local communities, 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 2025

Category	Amount (PLN’000)
BNP Paribas Foundation	5,045
Beneficiaries of the Local Grants Programme	500
Organisations promoting social inclusion and diversity	520
Organisations supporting education and culture	2,090
Social partners	62
Strategic partnership with the Szlachetna Paczka	632
Organisations promoting environmental protection	276
Total	9,125



Sponsorship

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 in 2025

Category	Amount (PLN’000)
Film events	7,746
Tennis events	0.5
Other sponsorship activities	1,452
Total	9,199

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 2025, the Bank took part in many film events, including:

- Mastercard OFF Camera International Festival of Independent Cinema – the largest independent film festival in Central Europe. The Bank was a partner of the event for the seventh time.
- BNP Paribas New Horizons – a festival distinguished by its programme, dozens of international meetings and an exceptional audience that gathers in Wrocław every summer.
- BNP Paribas Sopot–Zakopane Summer Cinema – the longest free summer film festival in Poland.
- BNP Paribas Green Film Festival – an international festival of environmental films. The Bank was the title sponsor of the 8th edition.
- BNP Paribas Two Riversides Film and Art Festival – a festival for connoisseurs of cinema and other arts. For the fifth consecutive year, the Bank served as the title partner.
- BNP Paribas Warsaw SerialCon – the first series festival in Poland. The Bank was the title partner for the second time.
- UKRAINA! 10th Film Festival – the Bank, as a partner of the event, was promoted in Warsaw during the main programme and in 14 cities across Poland.

Additionally, in 2025 the Bank:

- continued the “We Love Cinema” project – screenings of films from festivals sponsored by the Bank, organised for employees at the Bank’s headquarters;
- partnered with the original project by graphic artist Andrzej Pągowski – “Has Anew”, presenting posters for all 25 films by Wojciech Jerzy Has; the collection premiered at the BNP Paribas Two Riversides Festival;
- continued its cooperation with the Cinema City network, where it is, among others, a partner of IMAX cinemas and Ladies Night screenings.

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 2025, 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 tennis players - business people, held in Częstochowa, Gdynia, Katowice, Kraków, Poznań, Warsaw and Wrocław,
- XIX Beskid Cup - Polish Artists’ Tennis Tournament,
- over 20 local tennis tournaments for children and amateurs.

Other activities

BNP Paribas Young Talent

In 2025, the Bank continued its scholarship and development programme for young tennis players in Poland. In the third edition of the programme, the Bank had 14 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.



Economy and technology 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, agro-business, energy transition and sustainable development. They participated, among others, in:

- European Economic Congress in Katowice – the Bank served as a main partner and as a partner of several discussion panels: Europe’s Competitive Economy, Banks and ESG, VC and PE Funds, Polish Business in the World, Business on the Green Path, Finance of the Future, the Green Food Industry and the Family Foundation.
- European Financial Congress in Sopot – an event showcasing the extent to which the financial sector can support the competitiveness and development of the EU and Polish economies, as well as the transition and security agenda, in particular energy, digital, cyber and defence security, while also supporting Customers across the sector.

Environmental responsibility

Environmental responsibility is one of the Bank’s commitments under the GObeyond strategy in the POSITIVE pillar. For years, the Bank has been committed to minimising the impacts of and addressing climate change. In the time horizon of the GObeyond strategy, the Bank for Green Change Programme aggregated all the organisation’s environmental activities.

The programme consisted of:

- monitoring Customers and investments from an ESG perspective and implementing CSR policies, with a particular focus on decarbonisation processes,
- 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 Implementation of the strategy, Filar POSITIVE., section the [Sustainable financing](#)),
- real changes in the functioning of the organisation, 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 were to reduce CO₂ emissions, implement new 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 plays a key role as a catalyst for economic growth, providing the capital necessary for the transition and modernisation of enterprises. Owing to their position, financial institutions have a unique ability to shape sustainable development pathways by supporting the transition to a low-carbon economy. Aware of the direct impact that financing has on the economy’s emissions and on the natural environment, the Bank has introduced a number of ESG sector policies and regulations covering, among others, the mining sector, coal-based energy, the fuel sector (in the area of

unconventional oil and gas resources) and the agro-food sector. Their aim is to reduce the emissions intensity of the Bank’s portfolio and the climate impact of financed investments (for example, by not financing coal extraction or the combustion of thermal coal). More information on this topic can be found in the [Risks and Opportunities](#) chapter, in the ESG Risk section.

The Bank is intensifying its operational efforts to reduce greenhouse- emissions. One of the key objectives of the Bank’s GObeyond business strategy – an objective that has been achieved and even exceeded – was the reduction of CO₂ emissions from operational activities. To achieve this, the Bank uses 100% renewable energy and undertakes initiatives to reduce the carbon footprint of its buildings. It also considers the reduction of emissions associated with digital channels, marketing activities, communication and IT processes. The Bank is also taking steps to promote sustainable mobility, and nearly 100% of its fleet now consists of electric and hybrid vehicles. A detailed description of the Bank’s and the Group’s activities in this area, including objectives and their implementation status, as well as information on energy consumption and greenhouse gas emissions from Scope 1, Scope 2 and Scope 3 (category 6), can be found in the [Sustainability Statement, section Climate Change \(ESRS E1\)](#).

Water

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

Table 15. Water consumption in the Group

	2025	2024
Water consumption (m ³)	35,871	37,294

Table 16. Water consumption at the Bank

	2025	2024
Water consumption (m ³)	33,860	36,987

Method of presenting indicators: data for locations where there was no meter data (lump sum, water covered by rent) 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

Selected initiatives of the Bank to reduce plastic consumption:

- since 2019, the Bank has not ordered single-use plastic accessories or water in plastic bottles,
- employees can use water dispensers, glass carafes and glasses,
- in the canteen at the Bank’s Headquarters, reusable cutlery is used, as well as biodegradable or compostable cutlery and packaging for takeaway meals,
- outdated promotional prints are destroyed safely by a company authorised to perform such services.

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 2025

	Group	Bank
Purchase of paper (tonnes), of which:	181.8	176.9
share of certified and recycled paper	99.7%	99.7%

Table 18. Paper purchase at the Bank

tonnes	2025	2024
Paper used for internal operations	88.4	94.3
Paper used for marketing purposes	34.1	38.0
Bulk mail	51.6	50.2
Other	2.7	1.6
Total	176.9	184.1

Waste segregation

In 2025, 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 - from August 2022 until August 2025, we collaborated with EcoBean, a startup that recycles coffee grounds into reusable products: straws, cups or pots. In 2025, 700 kg of grounds were collected, and more than 8,200 kg throughout the collaboration,
- automatic segregation at the Bank’s headquarters building in Warsaw - the Bin-e 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 1,300 pieces and the resale for a "symbolic zloty" of 646 pieces of office furniture as part of cooperation with public benefit institutions, another 324 pieces sold to Bank employees.

Community-based employee initiatives

We support the environmental engagement of the Bank’s employees. In 2025, 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,
- 1,000 trees planted in cooperation with the Katowice Forestry Commission,
- Green Exchange Bank - dedicated space in the Bank’s headquarters in Warsaw, Katowice and Kraków for the exchange of books and potted plants,
- fourth edition of the "Commute to work by bike" competition – in 2025, the Bank’s employees cycled a total of more than 18,000 km,
- Safe Journey picnic - road safety education and eco-workshops for employees and their families,
- participation in the Two Hours for the Earth campaign in Katowice, Kraków 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 invested a total of approx. PLN 1.5 billion by the end of 2025 according to the strategy 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 enabled 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 optimise 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 utilise 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, defined in the GObeyond Strategy, to distribute a dividend at the level of 50% of net profit in 2025, was fulfilled. In accordance with Resolution No. 7 of the Annual General Meeting of 15 April 2025, the Bank allocated approximately 50% of its net profit for 2024 to dividend distribution (DPS: PLN 7.86).

Strategic commitments and their implementation

Indicator	Strategic Objective 2025	Implementation 2025
Total investments in technology by 2025	PLN 1.5 billion	PLN 1.5 billion
Optimisation of all key end-to-end processes*	156 processes	114 processes
Increase in efficiency of operations [vs 2021]	>10% per annum	+19% per annum
Number of use cases using artificial intelligence or advanced data analytics	>200	99
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 GObeyond strategy, aiming to become the digital bank of the future; it initiated wide-ranging actions in the technological field, defining them within the framework of strategic actions named IT@Scale. In 2025, the four-year implementation of this strategy was completed, resulting in a comprehensive transformation of the Bank's technological ecosystem.

Over the past four years, we have significantly increased the maturity of our IT processes and services: the annual number of IT incidents decreased by 92%, and the average downtime of critical services fell by 74%, demonstrating a substantial improvement in the stability and quality of our systems and services. As part of the IT ecosystem modernisation, we systematically reduced technological debt. The most important initiative in this area was the transformation of the Bank's core system, where we developed two new product factories – the Payment Factory and Customer360. These will ultimately replace a large group of outdated applications. We also guided the Bank through major regulatory changes and developed the foundations for a long-term core banking strategy.

We ensured the Bank's digital resilience by continuously developing and improving cybersecurity tools and processes, as well as expanding a modern multi-cloud environment. As a result, we maintained top-tier market cybersecurity indicators and one of the most advanced private-cloud-based environments in Poland.

We created a secure internal environment for working with generative artificial intelligence (genAI), along with a governance model supporting the adoption and development of new AI-based solutions. In 2025, more than 3,500 Bank employees used the internal personal chat assistant, generating over 34.5 million queries, confirming the growing use of these tools and the increasing efficiency of business processes. Our efforts in this area were recognised on the market, earning us a distinction in the international Banking Tech Awards.

We focused on building a strong internal IT team by developing competences in cloud technologies, IT architecture management, and the design and implementation of AI-based solutions. Employee turnover in the IT area decreased, while the engagement score rose by 9 percentage points, confirming growing commitment and trust in the organisation. Competence development is supported through a wide range of internal training programmes and development initiatives.

In 2025, the New Technologies and Cybersecurity area received several prestigious awards in the financial sector. The Bank's Vice-President and CIO of the area was named Innovator of the Year in the Leaders of the Financial World competition. Our achievements in cybersecurity were particularly recognised – we received the Golden Cybersecurity Shield Award in the 2025 Golden Banker competition and the Forrester Security & Risk Enterprise Leadership Award.

The assumptions of the IT@Scale strategy were successfully implemented over the past four years, and the direction we set – along with our achievements – had already been recognised the previous year with the prestigious Forrester Technology Strategy Impact Award. Over the last four years, we have built strong and modern foundations for the Bank's further dynamic growth, acquisition of new customers and increasing operational efficiency. Thanks to the elimination of key risks



and the comprehensive modernisation of the technological ecosystem, we are well prepared to meet the ambitious challenges defined by the new business strategy Accelerate 2030.

Implementation of the IT@Scale Strategy in 2025

INITIATIVE	Deep transformation of the core banking ecosystem (GOcore)
INITIATIVE DESCRIPTION	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: • 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	• implementation of two regulatory changes – SORBNET3 and SWIFT – in the payments area • advanced work aimed at migrating BLIK mass payments to the new Payment Factory platform (following the earlier launch of a new BLIK payment product – BLIK Cheques) • achieving readiness for the technical certification of the new SEPA Instant product (instant EUR transfers) • providing new customer data sources for determining the “golden record” on the Customer360 platform, migrating all planned customer-related business attributes to the new platform, and carrying out advanced work on integration with the Bank’s internal systems • developing the foundations for a long-term strategy and scenarios for the future modernisation or potential replacement of the core banking system

INITIATIVE	Hyperautomation/ DevOps Platform & Agile Way
INITIATIVE DESCRIPTION	Improving the maturity of IT management processes and services through optimisation, standardisation and automation
ACHIEVEMENTS	• introduction of automation and standardised tools supporting the efficiency of the software development process, ensuring full transparency and increasing the effectiveness of infrastructure cost management for individual systems, while reducing manual work • execution of an advanced PoC for providing AI services on a container platform, enabling faster and more cost-efficient implementation of AI Agents within the Bank • enhancement of the security of banking applications through the creation, automation and standardisation of the process for using third-party software • implementation of the first scope of a new functionality allowing the Bank to track the carbon footprint of individual systems

INITIATIVE	Building a data platform (GOdata)
INITIATIVE DESCRIPTION	Improving and implementing data solutions 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
ACHIEVEMENTS	• establishment of structures and introduction of a governance model enabling the effective adoption of generative AI solutions implemented in 2024, including: – a coding-assistant tool supporting software development work – a text2SQL tool enabling data processing using natural language – a personal-assistant tool • continued development of AI competences and strengthening operational efficiency across the organisation: training on managing and using genAI-based tools, as well as internal programmes focused on identifying new genAI applications in internal processes • enhancement of access control mechanisms for customer data in the Bank’s key system (the replica of the core banking system)

INITIATIVE	Building digital competences (Engineering Culture)
INITIATIVE DESCRIPTION	Building the Bank’s digital competences through innovative reskilling and upskilling programs and promoting knowledge about new trends and technologies
ACHIEVEMENTS	• GOtech Week and GOtech Week on Tour – subsequent editions of the Bank’s largest technology events dedicated to employees. The initiative aims to promote knowledge of trends and new technologies within the organisation, build business relationships and facilitate knowledge exchange • GOtech Excellence Awards – the first edition of an internal competition for employees of the NT&CS area. The goal is to highlight teams implementing innovative solutions with a strategic impact on the organisation’s development • UniversITy – the 7th edition of the internal upskilling programme offering training in new technologies for Bank employees. Since the programme’s launch in 2022, more than 6,000 employees have taken part in the training • launch of a mentoring and development programme for female students of technical and finance programmes at the University of Warsaw, supporting the idea of building diverse IT teams



INITIATIVE	Elimination of technological debt (GModulo)
INITIATIVE DESCRIPTION	Ensuring that business units are supported by providing modern, scalable, and cost-effective system architecture
ACHIEVEMENTS	- enhancement of processes and tools for managing the architecture of the Bank’s IT ecosystem, including the identification and management of technological debt within the implemented Architecture as a Product concept - modernisation of the Bank’s IT ecosystem through the decommissioning of 11 additional outdated production applications and two applications classified as critical technological 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	reduction of the average time needed to deliver infrastructure services to just a few minutes, and the launch of 12 additional services on the One Click platform – introduced in 2024 and based on a private-cloud environment – resulting in a significant decrease in manual work and an acceleration of processes related to managing the Bank’s infrastructure resources

Online and mobile banking

In 2025, 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, raising the level of Customer service quality and ensuring the highest security standards.

The Bank’s activities in the field of online 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.

Key changes in the systems and offerings for retail Customers in 2025
Payments - option to save mobile top-up templates - for SORBNET transfers, the option to execute a transfer after 15:00 in D+1 mode - development of SEPA, SWIFT and TARGET2 international transfers, along with returned information on sender/recipient code fields in the transaction history
Loans and cards - option to sign a credit card agreement with the Customer using a mobile signature in the GOMobile app - enabling the display of post-transaction balances in the transaction history for credit cards - extension of the credit term - making the process for selling consolidation loans available through electronic channels - changes to mortgage loan applications: - application for partial loan repayment - application for full loan repayment
Investment and savings - new FATCA questionnaire - addition of documents containing key information for investment portfolios - new ESG questionnaire for Micro Customers
Customer Data / Customer - questionnaire enabling Customers to confirm their data, helping us maintain the appropriate quality of our databases - addition of an option to book an appointment at a Customer Centre in the Services tab for Individual Customers - adaptation of digital channels to medium-level digital accessibility requirements
Accounts and cards implementation of the Dreams module and the new savings account
Security - activation of the GOMobile app using an additional Voicebot security step and the introduction of the Panic Button which immediately blocks online banking access - improved management of the number of applications and the activation of mobile authorisation - enhancement of the remote account opening process with new functionalities in Customer data verification modules



The development plans in the field of online and mobile banking is based on 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 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 equipped with additional mechanisms to prevent the potential effects of unauthorised access. The Bank conducts campaigns promoting modern methods of authorisation and responsible use of remote channels.

Table 19. Data concerning Retail Customers

Detailed list	System name	31.12.2025	31.12.2024	change %
Number of Customers / users using online banking	GOonline	645,191	668,039	(3.4%)
Average monthly number of transactions in the online channel	GOonline	2,540,606	2,794,421	(9.1%)
Number of Customers / users using the mobile application (GOMobile)	GOMobile	1,341,144	1,260,673	6.4%
Number of Customers / users using mobile banking (mobile devices)	GOMobile+GOonline	1,423,898	1,355,489	5.0%
Number of Customers / users using <u>only</u> the mobile application (GOMobile)	GOMobile	944,368	875,571	7.9%
Number of Customers / users using <u>only</u> mobile banking (mobile devices)	GOMobile+GOonline	1,083,047	1,006,328	7.6%

Key changes in the systems and offerings for business Customers in 2025

GOonline Biznes

- implementation of the new Cards module and launch of the Debit Card Application
- addition of a tab in the account details view presenting the account balance interest rate history
- migration of the Import Letters of Credit module in the Trade Finance panel to the new system version, new functionalities:
 - a summary of all open letters of credit (broken down by currency)
 - flexible search and additional filters (e.g., by users)
 - inclusion of SWIFT field numbers in the names of individual fields in applications
 - key information and actions available directly from the lists of letters of credit, orders and payments
 - the option to add new fields in orders, including country of origin of goods and comments for the bank

Key changes in the systems and offerings for business Customers in 2025

- implementation of a new mechanism for generating statements (daily and monthly), preventing the creation of statements for accounts where the Bank detects discrepancies in balances or transaction counts. Statements generated with errors are suspended until corrected, after which the corrected statements are automatically restored and available for download
- addition of new sections in the international transfer form for identifying the beneficiary in a non-EU country (Organisation Identifier and Private Identifier)
- extension of the list of beneficiary identifiers in the SEPA transfer form
- implementation of a mechanism verifying the validity date of identity documents (no possibility to authorise or send transfers in online or mobile banking if the document is expired)
- availability of export templates compliant with ISO20022 for the formats “Bank Statement XML V2 (camt.053.001.08)” and “Transaction History XML V2 (camt.052.001.08)”
- introduction of the CAMT (xml) preview function, enabling graphical display of the contents of files generated in xml format (camt.052.001.08, camt.053.001.08)

GOMobile Biznes

- addition of the Cards module
- addition of new sections in the international transfer form for identifying the beneficiary in a non-EU country (Organisation Identifier and Private Identifier)
- extension of the list of beneficiary identifiers in the SEPA transfer form

Table 20. Data concerning Corporate and SME Customers

Detailed list	System name	31.12.2025	31.12.2024	change %
Number of Customers actively logging in	GOonline Biznes	114,613	117,260	(2.3%)
Average monthly number of transactions	GOonline Biznes	7,381,154	6,835,064	8.0%
Number of Customers/users of the mobile application	GOMobile Biznes	40,863	34,881	17.1%

Bank cards

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

The number of issued cards as at 31 December 2025 amounted to 1,899,000 and was 308,000 lower than in 2024. The recorded decline in the credit and debit card portfolio results from the termination of inactive agreements and the implementation of KNF recommendations (AML and KYC processes) regarding the update of identity documents.



The Bank is pursuing acquisition activities to increase the number of cards and accounts. Current promotions require Customers to participate with transactions in order to meet bonus sales. Active card use is promoted in 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 Moje Premium Account with a dedicated Moja Premium Card or Multi-Currency Card,
- open an Otwarte na Ciebie Account with the possibility of issuing four cards (Otwarta na Dzisiaj, Otwarta na eŚwiat, Otwarta na Świat, and Multicurrency Card),
- take advantage of the Family Banking offer with the do Dorosłości Card issued to 13-18 year olds and the Samodzielniak Card issued to children aged 7-13,
- benefit from the dedicated offers of two new cards, the Visa Film Card, the Visa Tennis Card, and the new Pupil (My Pet) Card.
- In the Moje Premium and the Konto Otwarte na Ciebie Account offering, Customers can receive not only a physical card but also a mobile card. For each business segment, the Bank offers a full range of credit cards. The following initiatives deserve particular recognition in 2025:
- combining credit card distribution with a term deposit,
- acquisition campaigns offering gift card benefits (Allegro, Biedronka) and money-back mechanisms,
- promotion of the “Dobra karta” Mastercard credit card (promotional instalment plans, no-fee card, reduced interest rate), which accounted for nearly 50% of new acquisition,
- portfolio campaigns aimed at activating and increasing transaction volumes generated with credit cards.

Table 21. Number of bank cards issued by the Bank

'000	31.12.2025	31.12.2024	change y/y	
			'000	%
Retail Customers’ debit cards	1,430	1,415	15	1.1%
Retail Customers’ credit cards	256	584	(328)	(56.2%)
Business debit cards	201	195	6	3.0%
Business cards with deferred payment	8	8	0	1.2%
Business credit cards	3	4	(1)	(15.0%)
Total	1,899	2,207	(308)	(13.9%)

* excluding cards for technical accounts

Support for innovation

The Open Innovation Office in 2025 continued activities in supporting product development and improving technological and operational efficiency at the Bank

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,
- 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,
- SME and Corpo Sales Area - in the Banking for Innovative Companies project

Actions taken in 2025

Testing innovative solutions (Industry Tests) within the Polish Agency for Enterprise Development programme

In 2025, for the first time, the Office Team initiated participation in the Polish Agency for Enterprise Development’s Startup Booster programme and joined as one of the industry partners of the programme operator (the accelerator), Huge Thing. The Startup Booster programme aims to connect corporations (technology recipients) with innovative young companies (startups; solution/technology providers). In practice, this involved mapping the Bank’s current internal challenges and selecting several of the most important ones from the organisation’s perspective. Huge Thing then searched for startups capable of addressing these challenges and, during a six-month acceleration programme, carrying out a Proof of Concept under the guidance of experts from both the Bank and Huge Thing. The selected startup receives a non-repayable grant of up to PLN 350,000 from the programme operator to be used during the six-month testing period.

The Office Team conducted a call for topics among Departments and Product Owners interested in testing their ideas within the programme. Out of 15 submissions from diverse teams, 5 challenges were selected for further work.



To address the first two challenges, two startups were selected in the second half of 2025, and agreements for Industry Tests were signed with them (the results of these tests will be known by the end of March 2026). The selection of startups for the remaining three Industry Tests will take place in 2026.

Education and exploration of emerging technology trends

In 2025, the Team continued its efforts to promote and educate employees on the latest innovation trends that can support the strategy and objectives of individual Tribes and Product Owners.

AI Agents Academy Warsaw 2.0 – a training programme for practitioners planning to implement generative AI using the Zowie platform, one of the leading startups in agentic AI. Participants included individuals responsible for designing and deploying AI agents, automating customer service or operational processes, integrations and AI solution security. Sixty participants, divided into twelve teams, worked on their daily challenges and ways to solve them using agents. More information: [AI Agents Academy 2.0 – Warsaw](#).

“UX Guild” – regular meetings covering a wide range of topics related to UX design, user research and emerging trends in customer and digital product experience design. Guest speakers, often industry leaders, share their expertise and insights, helping guild members develop their skills and understand the latest challenges in UX.

“Startup Coffee” – a series of events enabling employees from the sales network and risk area to meet some of the most innovative and technologically advanced companies in Poland and their founders – our “Customers of tomorrow,” who are transforming the world and can also support our own transformation. Six additional meetings were held with founders of companies such as Riffsec and Pethelp.

“Startup Lovers Community” – an initiative launched in 2025 for employees interested in startups and the innovation ecosystem. The community receives dedicated monthly newsletters featuring key market updates, articles and industry reports, as well as special opportunities such as access to conferences and sector events.

Promoting an innovation ecosystem

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 collaboration with the SME and Corporate Customers Division. 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 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.

In the second half of 2025, the Office Team launched a dedicated credit facility for innovative companies (working capital or investment loan) – the InvestEU Loan – secured by a guarantee from the European Investment Fund (EIF). The purpose of the EIF support is to provide financing to enterprises whose risk profile is not always acceptable to private financial

institutions, thereby contributing to strengthening the competitiveness of the EU economy. The EIF guarantee line of EUR 25 million will enable the creation of a credit portfolio worth EUR 35 million. The InvestEU Loan is intended for companies in the SME and Commercial segments that meet innovation criteria (e.g., VC fund in the ownership structure, high R&D expenditure, new technologies, modern products, etc.). The maximum loan amount per client is up to EUR 7.5 million, and the guarantee covers up to 80% of the financing amount for companies outside Warsaw and 70% for companies based in Warsaw. The EIF limit will be available until April 2028. More information: [Kredyt z gwarancją InvestEU – nawet do 7,5 mln EUR na rozwój firmy - BNP Paribas Bank Polska S.A.](#)

Continuation of cooperation with the Polish Development Fund (PFR)

We continue to develop digitalisation pathways for small and medium-sized enterprises (SMEs) together with the Polish Development Fund. We joined the “Cyfrowa Wyprawka” initiative, which supports SMEs in their digital transition. The programme consists of six steps designed to help companies digitalise their operations. Thanks to PFR’s support, participants gain access to free advisory services, digital tools and educational materials that help them streamline processes and increase their digital maturity. One of the key tools is the “Digital Maturity Test,” which enables organisations to identify weaknesses and better understand the factors influencing their digital transition. As part of the programme, our Axepta payment gateway was included on the PFR Digital Solutions Map among tools that genuinely help entrepreneurs enter the digital world. Another element of the cooperation is a series of free webinars for entrepreneurs titled “Cyfrowy Start.”

Partnerships

In 2025, the Open Innovation Office established new partnerships and continued existing collaborations, thanks to which the Bank remains one of the most recognisable financial institutions within the startup ecosystem.

Partnership	Description
Startup Wrocław	An initiative of the Wrocław Agglomeration Development Agency, responsible among other things for networking the ecosystem of startups, large companies and investors, as well as promoting the successes of Wrocław-based startups. More information: Strona główna - Startup Wrocław Startup Wrocław
Endeavor Poland	Endeavor is a non-profit organisation bringing together technology entrepreneurs from around the world. It provides founders with strategic support in scaling their companies, as well as a platform through which they can share their knowledge and help other Polish businesses grow. Endeavor also invests in entrepreneurs through its co-investment fund, Endeavor Catalyst. The Bank’s Chief Innovation Officer is a member of the Founding Board of Endeavor Poland. More information: Endeavor Poland - Dream bigger. Scale faster. Pay it forward
Startup Poland	Startup Poland Foundation was established in 2015 by a group of entrepreneurs from fast-growing small and medium-sized technology companies, lawyers, academics and investors. Today, Startup Poland operates as a strong organisation that integrates and represents the



Partnership	Description
	interests of young, dynamic businesses in Poland. More information: Strona główna - Startup Poland
Emerging Founders	A collaboration network for founders of innovative companies scaling their businesses globally, typically in the revenue range from USD 250,000 to USD 1 million and above. More information: You will never grow alone - Emerging Founders
Entrepreneurs' Organisation (EO)	EO is the world's largest organisation for entrepreneurs, open to all founders of companies with annual revenues exceeding USD 1 million. Its mission is to grow together by sharing knowledge and providing mutual support, both in business and in private life. More information: Strona główna - EO Poland
Carpathian Startup Fest	In 2025, the Bank collaborated for the first time with the Rzeszów Regional Development Agency, the organiser of Poland's largest startup-focused conference, Carpathian Startup Fest, which in 2025 attracted more than 1,000 participants. The Bank served as an Event Partner and hosted workshops dedicated to innovation financing.
"Positive Impact Startups" report	The Bank has been co-creating the "Positive Impact Ecosystem" project with the Koźmiński Business Hub for many years. In June 2025, Koźmiński Business Hub published another edition of the "Positive Impact Startups" report. The aim of the report is, among other things, to highlight companies implementing the most interesting initiatives. The reports include expert commentary on the Polish positive impact ecosystem, as well as descriptions of the most noteworthy startups of the year. They also showcase innovative solutions proposed by positive impact startups across selected sectors – from construction, education and sustainable fashion to health and responsible tourism.

Cybersecurity

In 2025, the Bank continued to strengthen its cybersecurity capabilities, focusing on education and awareness building among both employees and Customers. As part of these efforts, a number of webinars, online courses and internal training sessions were delivered to enhance teams' competences in protecting against cyber threats. At the same time, information campaigns targeted at Customers were carried out through the Bank's website, social media, online meetings in the "Stay One Step Ahead of the Hacker" series, nationwide educational events for seniors organised in cooperation with the Senior Economy Congress, as well as messages in the electronic banking system regarding current fraud scenarios and principles of safe banking.

The security dedicated section of the Bank's official website (<https://www.bnpparibas.pl/bezpieczenstwo>), thoroughly redesigned in 2024, continues to be developed as the primary source of BNP Paribas' cybersecurity recommendations, including responses to risks arising from international conflicts and global instability. The Bank consistently maintained

heightened oversight of its IT infrastructure, implementing modern technologies to ensure the highest level of data and system protection.

Implementation of the strategy in 2025

INITIATIVE	Secure Tomorrow
INITATIVE DESCRIPTION	Strengthening cybersecurity
ACHIEVEMENTS	- continued development of state-of-the-art anti-fraud systems using advanced technologies, including artificial intelligence and machine learning mechanisms. These efforts focused primarily on increasing Customer security in online channels through more effective detection of suspicious activity, fraud attempts and false positives - strengthening IT infrastructure security through the development of the Threat Intelligence tool and reinforcement of network protection, including the use of cloud technologies; deepened cooperation with the BNP Paribas Group in the area of knowledge exchange and unified cybersecurity standards - expansion of anti-fraud systems preventing the theft of personal data and financial assets belonging to the Bank's Customers - successful execution of a series of tests covering resource relocation, notification systems, crisis scenario simulations and the recovery of key systems, including verification of their interoperability with other electronic-banking channels - further development of the PenTest Competence Centre to conduct internal penetration tests for critical banking applications - maintaining high security ratings 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 its employees such values (empowerment, cooperation, courage, simplicity and transparency) which in everyday work 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 with Customer expectations, the Bank operates in an agile working model, Agile@Scale with a high level of independence and decision-making power for employees.

Strategic commitments and their implementation

Indicator	Strategic Objective 2025	Implementation 2025
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%	3.7%
eNPS - employees Net Promoter Score [vs 2021: -9]	20	20
People working in Agile@Scale (in Tribes)	>1,300	~1,600

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 and 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 make a market success.

We want to achieve this through the continuous development of leadership as well as future 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 equipped 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 five 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:

- **Defining 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 our values: empowerment, cooperation, courage, simplicity and transparency, underpinned by "MOGE". All this determines the attitudes and behaviours of every employee. Since 2022, these values have been included in the evaluation process (EVP- Employee Value Proposition). They are embedded in the GObeyond strategy, and the pillar #TOGETHER refers directly 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 "MOGE" among all employees.
- **Education and training** - we deliver a range of educational activities - both development programmes and activities to raise awareness of the importance of human rights in the broadest sense. In 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 organisation responsible for developing and implementing products (business, IT, support roles). The Bank is currently organised 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, 61 Products, 77 Chapters and 169 Squads. Since January 2025, the Beyond Agile working model (a model that goes beyond Agile) has been extended to the retail distribution network and the Personal Finance area. Additionally, in the Operations and Business



Support Area, a new work model was implemented, based on Lean methodology and Beyond Agile practices (circle-based work). At the end of 2025, these working models (Agile@Scale, Beyond Agile, circle-based work in the Operations and Business Support Area) included around 5,300 employees (approximately 74% of the total workforce).

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, which shows how fast we can implement new solutions. In 2025, Time to Market improved by 16% year on year.
- **BETTER**- by delivering innovative, high-quality products and services based on Customer needs, measured by an increase in the NPS, which shows how Customers recommend the Bank. Thanks to the increased maturity of IT service management and delivery processes, critical errors were reduced significantly (by 92% in 2025 compared with 2022), and the downtime of critical systems was minimised (by 74% in 2025 compared with 2022).
- **HAPPIER** - through employee engagement, raising their competences, and attracting and retaining talent. The Pulse Check employee opinion survey shows that, at the Bank level, nearly all metrics remained strong, supported by the Agile@Scale and Beyond Agile ways of working. The eNPS score improved by 29 points, rising from –9 in 2021 to 20 in 2025, while the employee engagement score increased from 63% in 2021 to 77% in 2025. Employee turnover in the retail branch network (within the first 12 months of employment) decreased by 20 percentage points year on year.

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

Employee satisfaction survey

One very important goal of the Bank is to continuously build a friendly and engaging work environment. The main factor in 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. The survey was conducted in October 2025, and its results are currently being analysed by managers, HR Business Partners, the Organisational Culture Team and the Management Board.

The 2025 Pulse Check was the final survey conducted during the implementation of the Bank’s GObeyond strategy. We can confirm that the targeted indicators were achieved – an engagement score of 77% (the strategic target for 2025 was 70%) and an eNPS of 20 points (the 2025 target was 20)

Pulse Check eNPS

eNPS	2025	2024
Question: How likely are we to recommend BNP Paribas Bank as an employer to our friends and family?	20	27

Employment

Table 22. Employment structure in the Bank and the Group

Employment	Number of active employees		Number of active FTEs	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024
Group – total	7,255	7,512	7,232	7,478
Bank, including:	7,112	7,378	7,092	7,353
Headquarters	4,420	4,620	4,402	4,598
Customer Centres	2,579	2,642	2,577	2,638
Mobile advisers	73	74	73	74
Brokerage Office	35	37	35	37
Trade unions	5	5	5	5
BNP Paribas Towarzystwo Funduszy Inwestycyjnych S.A.	46	41	46	40
BNP Paribas Leasing Services Sp. z o.o.	10	13	6	7
BNP Paribas Group Service Center S.A.	87	80	88	79

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

At the end of December 2025, the Group’s headcount expressed in full-time equivalents amounted to 7,575 (compared with 7,883 at the end of December 2024), and the Bank’s headcount was 7,426 (compared with 7,746 at the end of December 2024).



7,255

active employees of the Group

7,112

active employees of the Bank

45%

women in the Group's senior management (B1+B2)

55%

women in the Group's lower management

For more information on the workforce structure, see the Sustainability Statement, section Own workforce.

In December 2023, as a result of negotiations with the trade unions, an agreement was signed on the rules for carrying out group layoffs and on the Voluntary Redundancy Programme. The agreement was concluded for the period 2024-2026. The group redundancies will involve the termination of employment contracts with up to 800 employees. This number includes employees who will be offered new terms and conditions of employment through change notices. In 2025, 197 employment contracts were terminated under the programme (in 2024, 164 employment contracts were terminated).

Remuneration

The Bank follows 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 remuneration. Formally, the rules related to remuneration are set out in the "Collective Bargaining Agreement" and the "Remuneration Policy for Employees of BNP Paribas Bank Polska S.A.". In addition, the Bank also has 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 Management by Objectives (MbO), 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 indicates to the employee what level of performance is 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 has in place:

- 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 Compensation Review Process; one of the significant criteria taken into account in this process is reducing the pay gap, for which dedicated funds are allocated.

At the end of 2025, the pay gap, as expressed in the adjusted Gender Pay Gap, was 3.87% This means that men's wages were 3.7% higher than women's wages in comparable positions. The indicator is a weighted average of the size of the various employee groups. Compared to 2024, the ratio decreased by 0.1 p.p. The Bank's strategic objective under the GO beyond Strategy for 2022-2025 was to reduce the pay gap to below 4%.

Table 23. Adjusted Gender Pay Gap

	2025	2024
Adjusted Gender Pay Gap (2025 target - <4%)	3.7%	3.8%

We calculate the adjusted gender pay gap 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 2025. We included total salaries for comparable positions in the analysis.



Diverse and inclusive workplace

In the Group, we create a diverse community for many talents. The inclusive organisational 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 organisation. We base daily cooperation on trust and respect - we want everyone in our Bank to be able to express themselves, realise their career aspirations, passions, feel appreciated and have a sense of influence.

83 years

age of most senior employee

42 years

average age of employees

20 years

age of most junior employee

42 years

longest period in service

Diversity management policy

The Bank's "Diversity Management Policy" in force since 2016 promotes a work environment focused on respecting and optimally utilising the potential inherent in the differences between employees. According to the Policy, diversity is respected in every aspect of workplace management in the Bank. 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 for respecting diversity. We have established the position of Diversity and Inclusion Manager, whose responsibilities include overseeing and coordinating respect for diversity. There are two 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 of respect for others at BNP Paribas Bank Polska S.A.):

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

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

In 2025, 17 reports were investigated at the Bank, of which the Employee Standards of Conduct Committee was appointed once due to the severity of the allegations made.

The complaints examined mainly concerned inappropriate relations with a superior or between colleagues. No behaviours amounting to mobbing or discrimination were 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 GObeyond 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):

- under the GObeyond Strategy, the targets included:
 - reducing the pay gap to below 4% in 2025, and
 - at least 30% women representation in management positions by 2025,
- increasing the employment of people with disabilities,
- monitoring of indicators relevant to D&I management, including, 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 grassroots 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 results

- 80 Financial results of the Group
- 99 Results of the business segments
- 103 Financial results of the Bank



Financial results of the Group

Consolidated statement of profit or loss

The BNP Paribas Bank Polska Group generated a net profit of PLN 3,057,754 thousand in 2025, up by PLN 699,486 thousand (29.7%) year on year.

The Group’s net banking income was PLN 8,184,962 thousand in 2025, up by PLN 432,246 thousand (5.6%) year on year. Significant factors influencing net banking income in 2025 and in 2024 included macroeconomic conditions and the interest rate policy of central banks, impacting among others Customers’ economic activity and the situation on the financial markets. The key factors driving the Group’s results included:

- NBP interest rates. From October 2023 until early May 2025, the NBP interest rates remained unchanged (5.75% for the reference rate). In 2025, the Monetary Policy Council (RPP) introduced six rate cuts, bringing the reference rate down to 4.00%. These reductions contributed to lower profitability of PLN loans with variable interest rates in 2025 compared with 2024. A potential continuation of rate cuts in 2026 would negatively affect PLN margins generated by banks,
- the monetary policy easing cycle launched by the European Central Bank in June 2024. By the end of July 2025, nine rate cuts had been implemented, reducing the deposit facility rate by 200 bps (to 2.0%). These changes lowered the profitability of variable rate loans granted in EUR,
- a strong liquidity position of Customers, leading to an increase in deposit volumes, enabling further growth in the scale of operations,
- the absence of a negative impact on the 2025 net interest income from the amendment to the statutory mortgage payment holiday scheme, which took effect in mid-May 2024,
- volatility in financial markets, including fluctuations in the PLN exchange rate against major currencies in the first half of 2025, driven among other factors by geopolitical conditions (including U.S. trade policy) and political uncertainty (including the presidential election in Poland). This volatility increased Customer demand for hedging instruments, positively impacting banks’ financial results,
- favourable market conditions and rising stock prices on the Warsaw Stock Exchange, combined with declining deposit interest rates, which supported Customer interest in asset management and brokerage services and contributed to higher fee and commission income for banks.

Net interest income, which is the biggest item of net banking income, stood at PLN 5,892,084 thousand in 2025, up by PLN 151,078 thousand (2.6%) year on year. Despite falling profitability of loans, this was possible thanks to gains on liquidity invested in securities and financial instruments, improvement in interest income on hedge accounting, and optimised cost of deposits.

The net banking income item to improve the most was net trading income, which stood at PLN 1,076,777 thousand in 2025 (up by PLN 211,725 thousand or 24.5% year on year). The improvement was driven among others by higher gains on financial instrument transactions in asset and liability management, higher gains on margins on currency exchange and derivatives transactions with Customers (including several large transactions with Customers in H1 2025), and improved gains on equity investments.

The negative impact of the legal risk of court cases concerning foreign currency mortgage loans remains a significant factor affecting the Group’s net profit. In 2025, thanks to gradual reduction of the portfolio and an observed decrease in the number of new court cases, the charge to the Group’s results was PLN 498,751 thousand, down by PLN 296,977 thousand year on year.

The quality of the loan portfolio remained strong in 2025, as confirmed by lower migration to Stage 3 and recovery on non-performing loans combined with no additional provisions for expected future materialisation of the cost of risk in the institutional portfolio (Post Model Adjustment), which had been set up in 2024. As a result, the negative impact on provisions for expected credit losses on financial assets and provisions for contingent liabilities stood at PLN 174,499 thousand in 2025, compared to a negative impact of PLN 246,192 thousand in 2024 (improvement by PLN 71,693 thousand).

General administrative expenses, depreciation and amortisation stood at PLN 3,368,667 thousand in 2025, up by only PLN 16,858 thousand (0.05%) year on year, despite an increase in the total cost of the Bank Guarantee Fund by PLN 52,343 thousand (net of the BFG cost, total costs would have decreased by PLN 35,485 thousand, i.e. 1.1%). General administrative expenses in 2025 were positively impacted by a review of the cost base, in particular the costs of advisory services, including services provided by the Group, and the costs of legal advisory on the CHF mortgage loan portfolio.

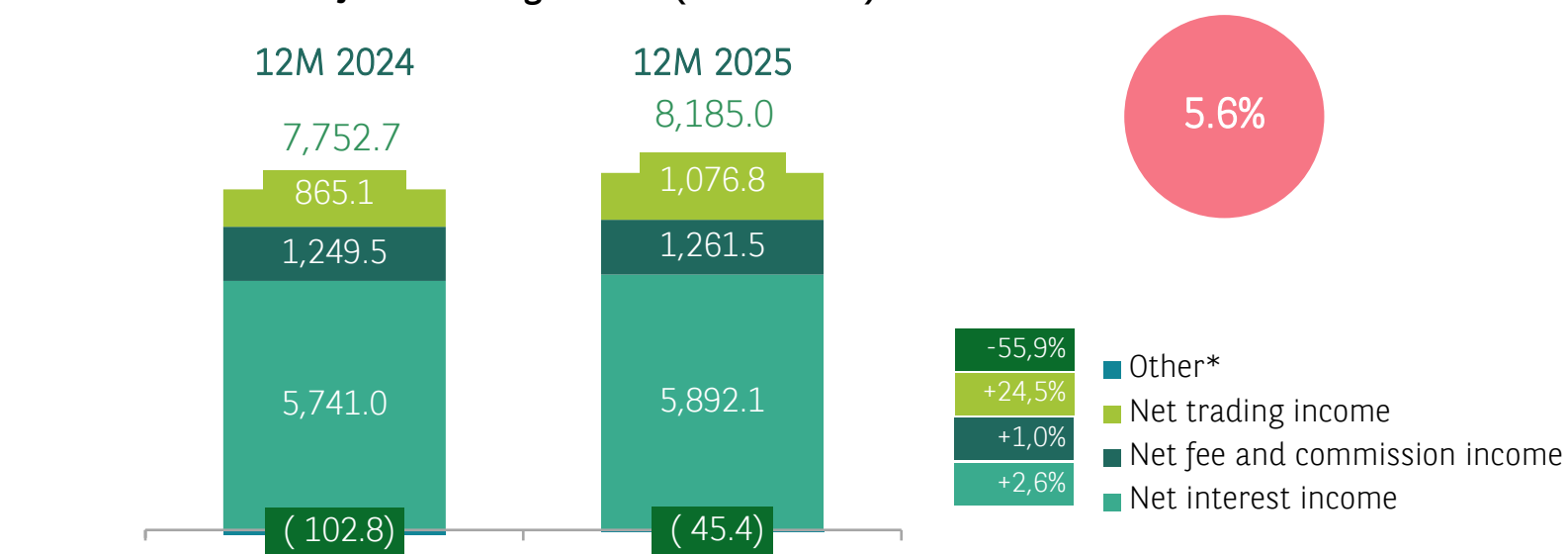
A change of the corporate income tax rate under the Act amending the Corporate Income Tax Act and the Act on Tax on Certain Financial Institutions adopted in Q4 2025 resulted in reevaluation of the deferred tax asset and liability using the future tax rates. The positive impact of the reevaluation on the Group’s result as at 31 December 2025 was PLN 174,116 thousand, recognised by the Group in Q4 2025.

A positive financial impact of deferred tax, based on provisions against future payments relating to the cancellation of CHF loans, was recognised at PLN 135,535 thousand in 2024.

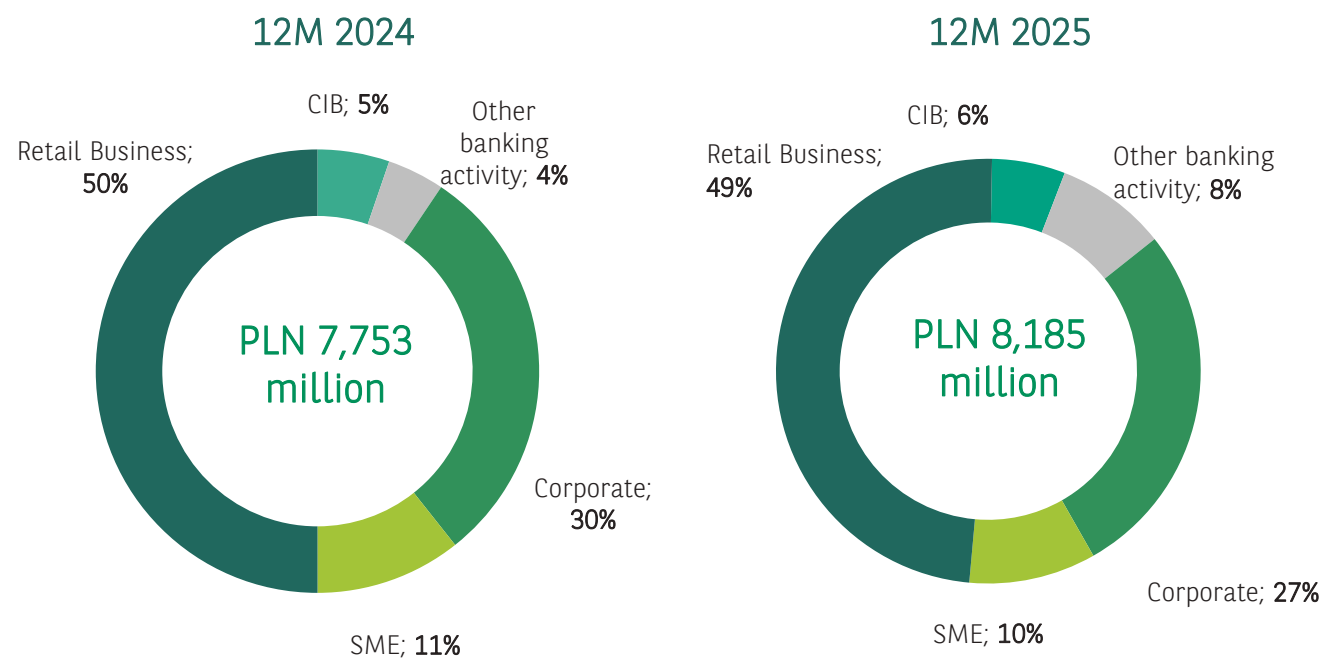
**Table 24. Statement of profit or loss**

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
Net interest income	5,892,084	5,741,006	151,078	2.6%
Net fee and commission income	1,261,469	1,249,458	12,011	1.0%
Dividend income	9,772	13,147	(3,375)	(25.7%)
Net trading income	1,076,777	865,052	211,725	24.5%
Result on investing activities	(2,340)	14,374	(16,714)	-
Result on hedge accounting	(11,161)	1,946	(13,107)	-
Result on derecognition of financial assets measured at amortized cost	(19,698)	(35,739)	16,041	(44.9%)
Other operating income and expenses	(21,941)	(96,528)	74,587	(77.3%)
Net banking income	8,184,962	7,752,716	432,246	5.6%
Net allowances on expected credit losses on financial assets and provisions for contingent liabilities	(174,499)	(246,192)	71,693	(29.1%)
Result on legal risk related to foreign currency loans	(498,751)	(795,728)	296,977	(37.3%)
General administrative expenses	(2,839,585)	(2,837,359)	(2,226)	0.1%
Depreciation and amortisation	(529,082)	(514,450)	(14,632)	2.8%
Operating profit	4,143,045	3,358,987	784,058	23.3%
Tax on financial institutions	(393,352)	(404,971)	11,619	(2.9%)
Profit before tax	3,749,693	2,954,016	795,677	26.9%
Income tax expense	(691,939)	(595,748)	(96,191)	16.1%
Net profit	3,057,754	2,358,268	699,486	29.7%
Net profit, net of credit holidays impact	3,057,754	2,414,542	643,212	26.6%

Note: Due to rounding, individual values presented in the tables and charts of these Financial Statements may not sum up.

Chart 14. Structure of net banking income (PLN million)

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

Chart 15. Net banking income by segment

The structure of net banking income by segment in 2025 did not change significantly compared to 2024. The increase in the share of Other operations was driven by an increase of gains in asset and liability management from invested liquidity and financial transactions. The decrease in the share of Corporate Banking was driven by interest rate cuts and realised interest income.



Net interest income

Net interest income, which is the Group’s main source of revenue, amounted PLN 5,892,084 thousand in 2025 and was higher year on year by PLN 151,078 thousand, i.e. by 2.6%. Net of the impact of credit holidays, net interest income in 2025 would be PLN 81,604 thousand. i.e. 1.4% higher compared to 2024. Interest income was lower by PLN 372,169 thousand, i.e. by 3.6% in 2025, while interest expenses decreased by PLN 523,247 thousand, i.e. by 11.6%.

An important external factor influencing net interest income is the interest rate policy of central banks. In 2024, NBP interest rates remained unchanged (5.75% for the reference rate). In 2025, the Monetary Policy Council (RPP) introduced six rate cuts, bringing the reference rate down to 4.00%. In June 2024 the European Central Bank launched a monetary policy easing cycle. By July 2025, nine rate cuts had been implemented, reducing the deposit facility rate by 200 bps (to 2.0% at the end of July 2025).

As a result of the lower average interest rates, the average profitability of PLN and EUR denominated loan products in 2025 was lower than in the previous year. The sensitivity analysis of the Group’s net interest income to interest rate changes is presented in the Risk and Opportunities chapter.

Table 25. Net interest income

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
Amounts due from banks	516,727	428,039	88,688	20.7%
Loans and advances to Customers measured at amortised cost	6,285,061	6,739,682	(454,621)	(6.7%)
Loans and advances to Customers measured at fair value through profit or loss	29,954	50,227	(20,273)	(40.4%)
Debt instruments measured at amortised cost	1,335,267	972,653	362,614	37.3%
Debt instruments measured at fair value through profit or loss	5,216	7,466	(2,250)	(30.1%)
Debt instruments measured at fair value through other comprehensive income	922,091	850,362	71,729	8.4%
Derivative instruments as part of fair value hedge accounting	737,283	854,393	(117,110)	(13.7%)
Derivative instruments as part of cash flow hedge accounting	39,312	11,628	27,684	238.1%

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
Repo transactions	2,003	330,633	(328,630)	(99.4%)
Total interest income	9,872,914	10,245,083	(372,169)	(3.6%)
Amounts due to banks	(577,473)	(725,863)	148,390	(20.4%)
Liabilities under issued debt securities	(42,071)	-	(42,071)	-
Amounts due to Customers	(2,275,767)	(2,437,170)	161,403	(6.6%)
Lease liabilities	(20,762)	(23,282)	2,520	(10.8%)
Derivative instruments as part of fair value hedge accounting	(980,603)	(1,275,490)	294,887	(23.1%)
Derivative instruments as part of cash flow hedge accounting	(63,816)	(36,561)	(27,255)	74.5%
Repo transactions	(20,338)	(5,711)	(14,627)	256.1%
Others related to financial assets	-	-	-	-
Total interest expense	(3,980,830)	(4,504,077)	523,247	(11.6%)
Net interest income	5,892,084	5,741,006	151,078	2.6%

Another factor affecting the comparability of interest income on loans and advances in 2025 and 2024 was the absence of the negative impact of statutory credit holidays in 2025. In 2024, following the entry into force of the Act of 12 April 2024 amending the Act on Support to Housing Loan Borrowers in Financial Distress and the Act of Crowdfunding for Economic Ventures and Borrower Assistance (the “Act”), the negative impact on the Group was PLN 69,474 thousand.

Total interest income on loans and advances to Customers measured at amortised cost and measured at fair value through profit or loss was PLN 6,315,015 thousand in 2025, down by PLN 474,894 thousand i.e. 7.0% year on year (net of the credit holidays impact, it was down by PLN 544,368 thousand i.e. 7.9%).

The factors that positively influenced the level of interest income in 2025 compared with 2024 included the continued very good liquidity position and the increase in the scale of the Group’s operations reflected among others in the increase in the average value of the securities portfolio.

Depending on market conditions and opportunities, the Group adjusts the mix of liquid assets and interbank transactions. As a result, the Group reported an increase in interest income on debt instruments measured at amortised cost and



measured at fair value by PLN 432,093 thousand i.e. 23.6% and an increase in interest income on amounts due from banks by PLN 88,688 thousand combined with a decrease in the cost of amounts due to banks by PLN 148,390 thousand.

The sharp decrease in the cost of interest on amounts due to banks was driven among others by a change in the Group’s approach to subordinated and long-term funding, as reflected in the replacement of loans and advances with bonds. As a result, interest costs in 2025 included the cost of liabilities under issued debt securities at PLN 42,071 thousand.

Net interest income was negatively impacted in 2025 by a decrease of interest income on reverse repo transactions by PLN 328,630 thousand (interest cost on reverse repos increased by PLN 14,627 thousand year on year). The decrease was due to a change of approach to investing the liquidity surplus.

The excess liquidity of the banking sector and the differences in the level of market interest rates between 2025 and 2024 contributed to a decrease in the cost of deposits. The Group’s comfortable liquidity position (the net loans/deposits ratio at the end of 2025 was 64.7% compared to 65.8% at the end of 2024) helped the optimisation of deposit margins. As a result, interest expenses on amounts due to Customers amounted PLN 2,275,767 thousand in 2025 and were lower by PLN 161,403 thousand, or by 6.6% in comparison with the costs incurred in 2024, despite an increase of the deposit portfolio.

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 2025 was negative at PLN 267,824 thousand, compared to a negative result of PLN 446,030 thousand in 2024 (a decrease in the negative impact of PLN 178,206 thousand i.e. 40.0% year on year).

Net fee and commission income

The Group’s net fee and commission income in 2025 amounted to PLN 1,261,496 thousand and was PLN 12,011 thousand (i.e. 1.0%) higher than in 2024. This was mainly the result of an improvement in commission income in the areas of payment cards and credit cards, asset management and brokerage operations. Fees and commissions on bank accounts and loans were down.

Fee and commission income amounted to PLN 1,519,765 thousand in 2025 and was down by PLN 8,789 thousand (i.e. by 0.6%) compared with 2024, while fee and commission expenses amounted to PLN 258,296 thousand and decreased by PLN 20,800 thousand (i.e. by 7.5%).

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

- asset management and brokerage operations by PLN 27,032 thousand, i.e. by 19.8% (primarily due to higher revenues from the sale and management of investment funds and brokerage services),
- payment card and credit card services by PLN 9,304 thousand, i.e. by 2.2 % (primarily due to higher revenues from cooperation with Mastercard and Euronet, higher income from card transactions in the form of transfers as well as higher income from interchange fees).

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

- loans, advances and leases by PLN 14,610 thousand or 5.1% (among others due to lower fee income from Retail and Business Banking loans, including loans to farmers as well as lower fees on used and unused commitments),
- sale of insurance products by PLN 10,375 thousand i.e. 6.1% (among others due to lower income on settlements with Cardif and sales of insurance for mortgage and farmer loans),
- account services by PLN 9,756 thousand i.e. 4.2% (among others due to lower fees for accounts of retail and micro Customers and court seizures in the micro segment),
- electronic banking transfers and services by PLN 6,149 thousand i.e. 5.7% (due to lower income from commissions on international payments and domestic outgoing payments).

The decrease in fee and commission expenses was mainly due to:

- lower costs of payment card and credit card services by PLN 12,761 thousand i.e. 10.6% (among others, lower settlement cost of card transactions),
- lower other commissions by PLN 5,063 thousand i.e. 9.1% (mainly lower provisions for unpaid commissions and cost of writing down unpaid commissions),
- lower cost of guarantees and documentary transactions by PLN 4,783 thousand i.e. 52.4%.

Table 26. Net fee and commission income

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
Fee and commission income				
loans, advances and leases	274,640	289,250	(14,610)	(5.1%)
account maintenance	221,177	230,933	(9,756)	(4.2%)
cash service	30,353	31,462	(1,109)	(3.5%)
cash transfers and e-banking	101,898	108,047	(6,149)	(5.7%)
guarantees and documentary operations	76,384	77,320	(936)	(1.2%)
asset management and brokerage operations	163,610	136,578	27,032	19.8%
payment and credit cards	423,611	414,307	9,304	2.2%



PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
insurance mediation activity	159,066	169,441	(10,375)	(6.1%)
product sale mediation and Customer acquisition	13,408	12,667	741	5.8%
other commissions	55,618	58,549	(2,931)	(5.0%)
Total fee and commission income	1,519,765	1,528,554	(8,789)	(0.6%)
Fee and commission expense				
loans, advances and leases	(319)	(1,294)	975	(75.3%)
account maintenance	(9,398)	(9,774)	376	(3.8%)
cash service	(30,466)	(28,566)	(1,900)	6.7%
cash transfers and e-banking	(3,369)	(2,765)	(604)	21.8%
guarantees and documentary operations	(4,337)	(9,120)	4,783	(52.4%)
asset management and brokerage operations	(8,365)	(6,647)	(1,718)	25.8%
payment and credit cards	(107,855)	(120,616)	12,761	(10.6%)
insurance mediation activity	(19,692)	(21,487)	1,795	(8.4%)
product sale mediation and Customer acquisition	(23,742)	(23,011)	(731)	3.2%
other commissions	(50,753)	(55,816)	5,063	(9.1%)
Total fee and commission expenses	(258,296)	(279,096)	20,800	(7.5%)
Net fee and commission income	1,261,469	1,249,458	12,011	1.0%

Dividend income

Dividend income of the Group in 2025 totalled PLN 9,772 thousand and was paid from the profits of companies for 2024 in which the Bank held a minority interest, i.e.: among others, Biuro Informacji Kredytowej S.A. (PLN 4,251 thousand), Krajowa Izba Rozliczeniowa S.A. (PLN 2,473 thousand), VISA (PLN 328 thousand) and Mastercard (PLN 125 thousand).

Dividend income in 2024 totalled PLN 13,147 thousand and was paid 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).

Net trading income and result on investment activities

Net trading income in 2025 amounted to PLN 1,076,777 thousand and was higher by PLN 211,725 thousand, i.e. by 24.5% year on year. 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 result on equity instruments measured at fair value through profit or loss.

The increase in net trading income in 2025 compared to 2024 was mainly due to higher gains on derivatives and foreign exchange transactions which stood at PLN 1,013,634 thousand in 2025 (up by PLN 173,579 thousand, i.e. 20.7% year on year. The improvement was driven mainly by higher gains on financial instrument transactions in asset and liability management (mainly FX swaps) and higher gains on margins on foreign exchange and derivatives transactions with Customers (including several large transactions with Customers in the Corporate and Institutional Banking (CIB) segment in H1 2025). The margin on foreign exchange and derivatives transactions with Customers increased by PLN 55,834 thousand i.e. 7.7% year on year.

The increase in net trading income was also supported by a significant improvement in gains on equity instruments measured at fair value through profit or loss, which stood at PLN 66,861 thousand in 2025, up by PLN 44,594 thousand i.e. 200.3% year on year. The increase occurred in the Group's equity investments.

The result on investment activities in 2025 was negative at PLN 2,340 thousand compared to a positive result of PLN 14,374 thousand in 2024.

The decrease in the result on investment activities was mainly due to a PLN 11,286 thousand year-on-year decrease in gains on debt instruments measured at fair value through other comprehensive income and a PLN 5,428 thousand decrease in the valuation of the portfolio of loans and advances to Customers measured at fair value through profit or loss.

Other operating income

Other operating income in 2025 amounted to PLN 311,261 thousand, up by PLN 82,662 thousand or 36.2% year on year.

The change in other operating income was mainly due to:

- income from the release of provisions for litigation and other liabilities up by PLN 63,687 thousand (i.e. by 326.2%) (among others, release of provisions for a penalty imposed by the General Inspector of Financial Information for failure to perform obligations under the Anti-Money Laundering and Counter-Terrorist Financing Act, reduction of provisions for the legal risk of relationships with the Bank's Partners and provisions for potential costs of litigation concerning cancellation of loan agreements),
- income from the sale or liquidation of property, plant and equipment and intangible assets up by PLN 13,323 thousand (i.e. 69.2%) following the sale of the Bank's real estate in Gdańsk and Łódź,
- income from the sale of goods and services up by PLN 8,517 thousand (i.e. 40.5%).



Table 27. Other operating income

PLN'000	12 months	12 months	change y/y	
	ended 31.12.2025	ended 31.12.2024	PLN'000	%
Sale or liquidation of property, plant and equipment and intangible assets	32,586	19,263	13,323	69.2%
Impairment allowances on other receivables	5,051	8,104	(3,053)	(37.7%)
Sale of goods and services	29,549	21,032	8,517	40.5%
Release of provisions for litigation and claims and other liabilities	83,212	19,525	63,687	326.2%
Recovery of debt enforcement costs	21,002	22,098	(1,096)	(5.0%)
Recovered compensation	-	-	-	-
Leasing operations	54,749	56,398	(1,649)	(2.9%)
Other operating income	85,112	82,179	2,933	3.6%
Total other operating income	311,261	228,599	82,662	36.2%

Other operating expenses

Other operating expenses in 2025 amounted to PLN 333,202 thousand and were up by PLN 8,075 thousand (i.e. 2.5%) year on year.

Other operating expenses were mainly influenced by:

- other operating expenses up by PLN 33,107 thousand (i.e. 21.9%) (among others due to the cost of settlements and enforcement of court judgments paid to the Bank's Partners and additional provisions set up in 2025 for the cost of unauthorised transactions of Customers at PLN 48.9 million),
- costs of provisions for litigation and claims and other liabilities down by PLN 11,006 thousand (i.e. 18.5%),
- costs of leasing operations down by PLN 4,536 thousand (i.e. 10.5%),
- costs of impairment of other receivables down by PLN 3,761 thousand (i.e. 34.5%),
- cost of sale or liquidation of property, plant and equipment and intangible assets down by PLN 3,700 thousand (i.e. 26.1%).

Table 28. Other operating expenses

PLN'000	12 months	12 months	change y/y	
	ended 31.12.2025	ended 31.12.2024	PLN'000	%
Loss on sale or liquidation of property, plant and equipment and intangible assets	(10,500)	(14,200)	3,700	(26.1%)
Impairment allowances on other receivables	(7,143)	(10,904)	3,761	(34.5%)
Creation of provisions for litigation and claims and other liabilities	(48,401)	(59,407)	11,006	(18.5%)
Debt enforcement	(35,042)	(38,591)	3,549	(9.2%)
Donations made	(9,414)	(7,894)	(1,520)	19.3%
Costs of leasing operations	(38,646)	(43,182)	4,536	(10.5%)
Costs of compensations, penalties and fines	-	-	-	-
Other operating expenses	(184,056)	(150,949)	(33,107)	21.9%
Total other operating expenses	(333,202)	(325,127)	(8,075)	2.5%

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 2025 stood at a negative PLN 174,499 thousand compared to a negative PLN 246,192 thousand in 2024 (improvement by PLN 71,693 thousand i.e. 29.1% year on year).

Considering the main operating segments:

- Retail and Business Banking segment: negative result (-PLN 6,447 thousand), deterioration of result by PLN 5,078 thousand,
- SME Banking segment: positive result (+PLN 56,619 thousand), improvement of result by PLN 56,064 thousand,
- Corporate Banking segment: (including CIB) negative result (-PLN 207,949 thousand), improvement of result by PLN 37,857 thousand,
- other banking operations: negative result (-PLN 16,723 thousand), deterioration of result by PLN 17,152 thousand.



The difference in the cost of risk in 2025 vs. 2024 was significantly influenced by one-offs including mainly additional provisions for expected future materialisation of the cost of risk in the institutional portfolio (Post Model Adjustment) set up in 2024.

The quality of the loan portfolio remained strong in 2025, as confirmed by lower migration to Stage 3 and recovery on non-performing loans. The following one-off events impacted the cost of risk in 2025:

- release of additional provisions (Post Model Adjustment) for risks identified in the portfolio as a result of analyses and portfolio observation at PLN 44,979 thousand including:
 - PLN 19,168 thousand released for sensitive customers using credit holidays,
 - PLN 11,000 thousand released for sensitive customers in the commercial real estate segment,
 - PLN 8,663 thousand released for customers in sectors exposed to the results of a crisis in the German economy (automotive, furniture, large home equipment),
- positive impact from the sale of loans at PLN 28,172 thousand,
- adjusting the level of write-downs to expectations of the future macroeconomic situation, resulting in additional PLN 5,679 provisions as a result of updating the forecasts of macroeconomic factors included in the IFRS 9 model,
- the total impact of changes to models and update of parameters was minor at PLN 1,851 thousand, where the biggest individual impact was that of the adjustment of the IFRS 9 model including change of granularity of EAD depreciation in the ECL calculation formula resulting in PLN 46,226 thousand released.

In 2025, the Bank entered into agreements to sell retail, SME and corporate portfolios. The gross carrying amount of the sold portfolio measured at amortised cost was PLN 273,916 thousand, the amount of impairment allowances created was PLN 219,696 thousand. The contractual price for the sale of these portfolios was set at PLN 82,392 thousand. The net impact on the Bank’s result due to the sale of portfolios amounted to PLN 28,172 thousand and is presented under Net allowances on expected credit losses of financial assets and provisions for contingent liabilities.

In 2024, the Group entered into agreements to sell 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 allowances 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 under Net allowances on expected credit losses of financial assets and provisions for contingent liabilities.

The cost of credit risk, measured as the result on allowances to the average gross loans and advances to Customers measured at amortised cost (calculated on the basis of balances at the end of each quarter), was -0.19% in 2025 compared with -0.28% in 2024. Net of the impact of the sale of loans, the estimated cost of risk would be -0.23% in 2025 and -0.35% in 2024.

General administrative expenses, depreciation and amortisation

The Group’s general administrative expenses (combined with depreciation and amortisation) in 2025 amounted to PLN 3,368,667 thousand, an increase of PLN 16,858 thousand, or 0.5%, compared to 2024.

Table 29. General administrative expenses, depreciation and amortisation

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Personnel expenses	(1,614,769)	(1,554,054)	(60,715)	3.9%
Marketing	(122,683)	(104,517)	(18,166)	17.4%
IT and telecom expenses	(339,005)	(312,287)	(26,718)	8.6%
Short-term lease and operation	(89,422)	(83,229)	(6,193)	7.4%
Other non-personnel expenses	(150,985)	(148,734)	(2,251)	1.5%
External services under other contracts and consulting	(176,017)	(351,505)	175,488	(49.9%)
Business travel	(12,396)	(11,783)	(613)	5.2%
Vehicle maintenance cost	(28,618)	(26,107)	(2,511)	9.6%
ATM and cash handling expenses	(31,448)	(29,952)	(1,496)	5.0%
Costs of outsourcing services related to leasing operations	(918)	(1,445)	527	(36.5%)
Court and notary fees	(53,641)	(49,366)	(4,275)	8.7%
Bank Guarantee Fund fee	(196,335)	(143,992)	(52,343)	36.4%
Commercial Bank Protection Scheme fee	-	-	-	-
Polish Financial Supervision Authority fee	(23,348)	(20,388)	(2,960)	14.5%
Total general administrative expenses	(2,839,585)	(2,837,359)	(2,226)	0.1%
Depreciation and amortisation	(529,082)	(514,450)	(14,632)	2.8%
Total costs	(3,368,667)	(3,351,809)	(16,858)	0.5%

A year-on-year increase in costs was recorded in the following categories:

- Personnel expenses - an increase of PLN 60,715 thousand, i.e. by 3.9%, as a result of: an increase in salary costs by PLN 40,918 thousand (annual increase in basic salaries from March), increased additional charges on salaries by PLN 10,803



thousand, allocation to the Company Social Benefits Fund up by PLN 4,123 thousand and other costs up by PLN 2,277 thousand (mainly costs of occupational health and safety). The increase in personnel expenses was to some extent offset by a reduction in the Group's headcount by 246 active FTEs year on year;

Table 30. Personnel expenses

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Payroll expenses	(1,283,041)	(1,242,123)	(40,918)	3.3%
Payroll charges	(233,386)	(222,583)	(10,803)	4.9%
Employee benefits	(62,053)	(61,562)	(491)	0.8%
Costs of restructuring provision	(1,904)	(649)	(1,255)	193.4%
Costs of provision for future liabilities arising from unused annual leave and retirement benefits	(7,055)	(6,207)	(848)	13.7%
Appropriations to Social Benefits Fund	(23,535)	(19,412)	(4,123)	21.2%
Other	(3,795)	(1,518)	(2,277)	150.0%
Total personnel expenses	(1,614,769)	(1,554,054)	(60,715)	3.9%

- Bank Guarantee Fund (BFG) fee - an increase of PLN 52,343 thousand i.e. 36.4%:
 - contribution to the banks' guarantee fund was PLN 40,218 thousand in 2025 (the Bank did not pay the cost of the contribution in 2024 as the BFG decided to suspend the charge),
 - annual contribution to the banks' resolution fund, recognised in Q1 2025, stood at PLN 156,118 thousand (up by PLN 12,126 thousand year on year);
- IT and telecom expenses - up by PLN 26,718 thousand, or 8.6% - driven by an increase in the Bank's costs of software maintenance contracts, licence fees, unamortised expenses, Contact Centre Customer service costs, higher maintenance costs of business systems and BNP Group systems. IT costs of GSC decreased by PLN 3,148 thousand year on year;
- Marketing costs - an increase of PLN 18,166 thousand, i.e. 17.4% - mainly due to a larger number of broader-scope campaigns carried out in 2025 (including the Daily Banking – GOdreams and tennis card campaign, the business account with a fuel card, the 9% savings account, the Pupil (My Pet) card, the "Accelerate Your Business" campaign for micro-enterprises, the SME/Corporate branding campaign, and Go 4 Funds), higher event organisation costs (a greater number of events and initiatives – including those related to the Bank's Strategy and acquisition focused event cycles in Carrefour), as well as higher sponsorship expenses;

- Cost of short-term leases and maintenance – an increase of PLN 6,193 thousand due to higher costs of cleaning, renovation, repairs, regular check-ups and maintenance;
- Court and notary fees – an increase of PLN 4,275 thousand;
- Polish Financial Supervision Authority supervision costs – an increase by PLN 2,960 thousand;
- Vehicle maintenance cost (cost of the Bank's company cars – fuel, charging of electric vehicles, maintenance costs) – an increase by PLN 2,511 thousand year on year.

The decrease in costs of External services under other contracts and consultancy by PLN 175,488 thousand, i.e. by 49.9%, is due to lower costs of:

- services provided by the Group, down by PLN 114,271 thousand (partial release of provisions set up in 2022-2024),
- legal advisory mainly on litigation concerning CHF loans, down by PLN 61,333 thousand,
- other advisory services, down by PLN 14,421 thousand,

while the following costs increased:

- bulk mailing up by PLN 3,963 thousand,
- HR consultancy and recruitment costs up by PLN 2,073 thousand,
- external services at the leasing company up by PLN 3,202 thousand,
- external services at GSC up by PLN 2,611 thousand.

Total costs related to legal services for CHF loan litigation amounted to PLN 59,674 thousand in 2025 (PLN 116,829 thousand in 2024) and are included under: External services under other contracts and consultancy (PLN 7,197 thousand in 2025 vs. PLN 68,530 thousand in 2024) and Notary and court fees (PLN 52,477 thousand in 2025 vs. PLN 48,299 thousand in 2024).

Depreciation and amortisation expenses amounted to PLN 529,082 thousand in 2025 and were higher compared to 2024 by PLN 14,632 thousand, i.e. by 2.8%. This increase was mainly due to the Bank's further digitalisation and the expenses incurred for this purpose. Depreciation and amortisation costs in Group companies remained stable year on year.

The Bank's capital expenditure amounted to PLN 442,242 thousand in 2025 and was stable year on year (PLN 442,757 thousand in 2024). The expenditure mix changed. Expenditure increased year on year in 2025 for computer hardware by PLN 20,809 thousand and leasehold improvements by PLN 7,424 thousand. At the same time, expenditure on external staff costs decreased by PLN 14,524 thousand and expenditure for intangible assets decreased by PLN 7,869 thousand. 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 comprehensive income

The Group’s total comprehensive income in 2025 amounted to PLN 3,414,803 thousand, an increase of PLN 1,030,626 thousand, or 43.2%, compared with 2024 (PLN 2,384,177 thousand). The increase in the Group’s comprehensive income was driven by:

- an increase in net profit by PLN 699,486 thousand, i.e. 29.7% year on year,
- valuation of financial assets measured through other comprehensive income (improvement by PLN 303,531 thousand);
- valuation of cash flow hedging derivatives (improvement by PLN 88,283 thousand).

Table 31. Statement of comprehensive income

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
Net profit	3,057,754	2,358,268	699,486	29.7%
Other comprehensive income				
Items that may be reclassified subsequently to profit or loss upon fulfilment of certain conditions	356,033	27,255	328,778	1,206.3%
Measurement of financial assets measured at fair value through other comprehensive income, gross	347,318	43,787	303,531	693.2%
Deferred income tax on the valuation of gross financial assets measured through other comprehensive income	(56,160)	(8,320)	(47,840)	575.0%
Measurement of cash flow hedge accounting derivatives	78,145	(10,138)	88,283	-
Deferred income tax on the valuation of gross derivatives hedging cash flows	(13,270)	1,926	(15,196)	-
Items that will not be reclassified to profit or loss	1,016	(1,346)	2,362	(175.5%)
Actuarial valuation of employee benefits	1,534	(1,662)	3,196	(192.3%)
Deferred income tax on actuarial valuation of gross personnel expenses	(518)	316	(834)	(263.9%)
Other comprehensive income (net)	357,049	25,909	331,140	1,278.1%
Total comprehensive income	3,414,803	2,384,177	1,030,626	43.2%

Statement of financial position

Assets

The Group’s total assets as at 31 December 2025 amounted to PLN 180,725,264 thousand, an increase of PLN 13,185,675 thousand, or 7.9%, year on year.

The most significant change in the Group’s asset mix compared to the end of 2024 was an increase in the share of the securities portfolio by 0.6 p.p., amounts due from banks by 1.7 p.p., and a decrease in the share of cash and balances at Central Bank by 1.1 p.p. and the loan portfolio by 0.8 p.p. (sum of portfolios measured at amortised cost and at fair value).

The Group’s predominant asset structure category were loans and advances to Customers (the sum of portfolios measured at amortised cost and at fair value), which accounted for 50.4% of total assets as at 31 December 2025, compared to 51.2% as at 31 December 2024. Net loans and advances volumes increased by PLN 5,319,839 thousand i.e. 6.2% year on year and reached PLN 91,173,861 as at 31 December 2025. The retail Customers’ portfolio increased by 5.2% year on year (including mortgage loans up by 5.9%). The institutional Customers’ loan portfolio increased by 6.8% year on year (mainly as a result of a 9.8% increase in the portfolio of loans and advances to business entities combined with a decrease in lease receivables by 3.6%).

The second largest asset item were securities, which accounted for 33.8% of total assets as at 31 December 2025 (33.3% as at 31 December 2024). Their value increased by PLN 5,427,939 thousand (i.e. by 9.7%) year on year. The largest increase (by PLN 3,816,076 thousand, i.e. 11.8%) was reported in the portfolio of securities measured at amortised cost (mainly Treasury bonds and securities issued by domestic banks and other financial institutions). The portfolio of securities measured at fair value through other comprehensive income increased by PLN 1,692,348 thousand i.t. 7.3% year on year (increase primarily in Treasury bonds issued by central governments and bonds issued by other financial institutions, partly offset by a decrease in the portfolio of NBP money bills).

The share of cash and balances at Central Bank (the third largest asset line) was 5.7% (6.8% as at 31 December 2024). Its value decreased by PLN 1,100,685 thousand (i.e. by 9.7%) year on year and amounted to PLN 10,224,866 thousand. The share of amounts due from banks increased from 4.7% to 6.4% (in value by PLN 3,744,191 thousand, i.e. by 47.6%).

Table 32. Assets

PLN'000	31.12.2025	31.12.2024	change	
			PLN'000	%
Cash and balances at Central Bank	10,224,866	11,325,551	(1,100,685)	(9.7%)
Amounts due from banks	11,616,566	7,872,375	3,744,191	47.6%
Derivative financial instruments	2,359,460	2,440,116	(80,656)	(3.3%)
Differences from hedge accounting	345,550	230,658	114,892	49.8%



PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Loans and advances to Customers measured at amortised cost	90,887,678	85,401,516	5,486,162	6.4%
Loans and advances to Customers measured at fair value through profit or loss	286,183	452,506	(166,323)	(36.8%)
Securities measured at amortised cost	36,180,626	32,364,550	3,816,076	11.8%
Securities measured at fair value through profit or loss	240,949	321,434	(80,485)	(25.0%)
Securities measured at fair value through other comprehensive income	24,719,802	23,027,454	1,692,348	7.3%
Intangible assets	964,459	975,114	(10,655)	(1.1%)
Property, plant and equipment	947,992	946,971	1,021	0.1%
Deferred tax assets	898,673	859,567	39,106	4.5%
Current tax assets	920	1,515	(595)	(39.3%)
Other assets	1,051,540	1,320,262	(268,722)	(20.4%)
Total assets	180,725,264	167,539,589	13,185,675	7.9%

Loan portfolio

Loan portfolio structure

As at 31 December 2025, gross loans and advances to Customers (the sum of portfolios measured at amortised cost and measured at fair value) amounted to PLN 93,559,557 thousand and remained stable year on year (an increase of PLN 5,172,302 thousand or 5.9%)

The gross portfolio of loans and advances measured at amortised cost amounted to PLN 93,207,076 thousand as at 31 December 2025 (up by PLN 5,347,316 thousand, i.e. +6.1% year on year).

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

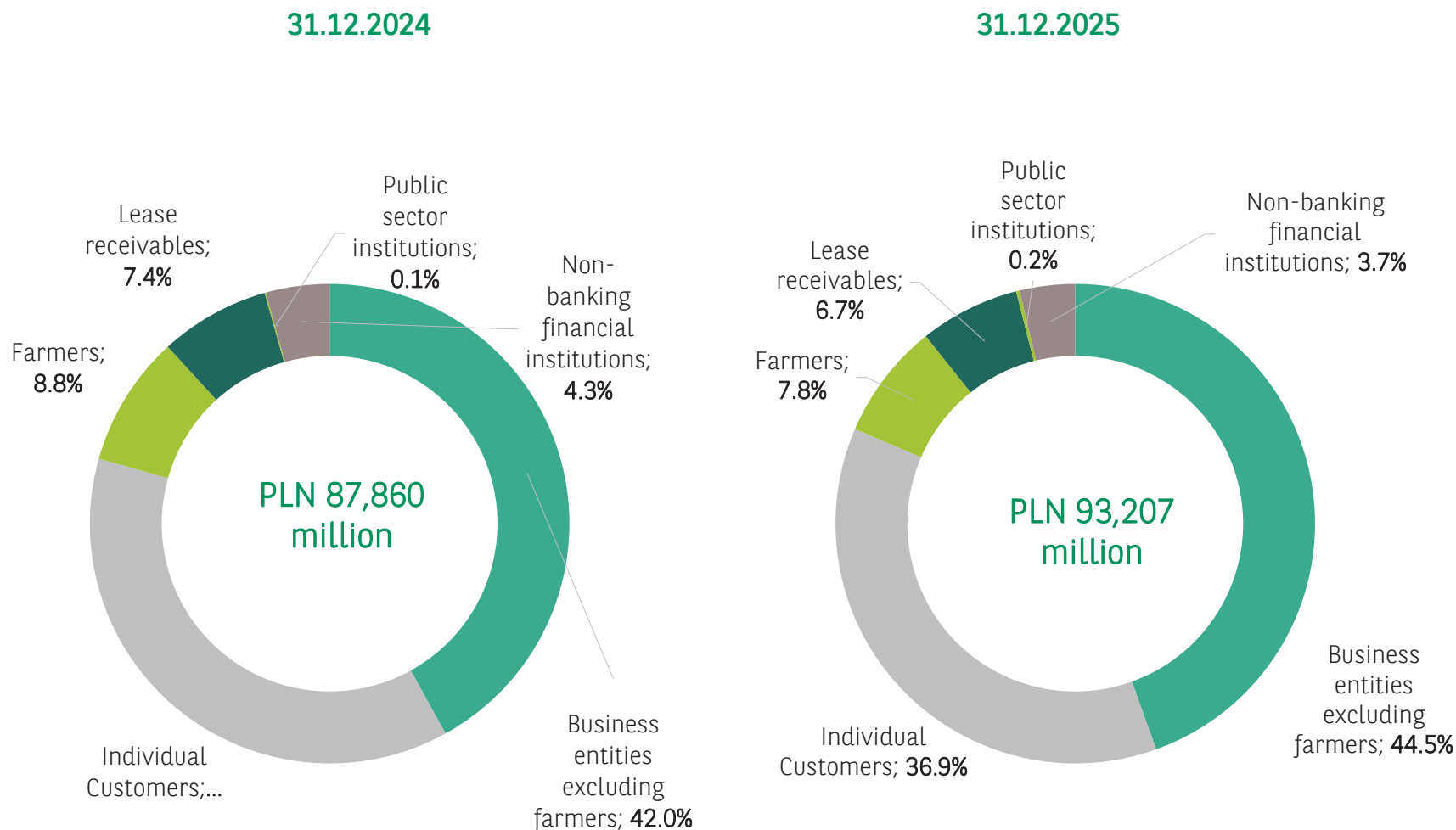
PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Corporate Customers excluding farmers	41,500,062	36,874,775	4,625,287	12.5%
Farmers	7,296,966	7,769,080	(472,114)	(6.1%)
Individual Customers	34,428,276	32,858,093	1,570,183	4.8%
- mortgage loans	21,335,075	20,207,062	1,128,013	5.6%
PLN	21,062,351	19,779,708	1,282,643	6.5%
foreign currency	272,724	427,354	(154,630)	(36.2%)
- cash loans	8,604,762	8,487,233	117,529	1.4%
- other retail loans	4,488,439	4,163,798	324,641	7.8%
Leasing receivables	6,282,940	6,519,624	(236,684)	(3.6%)
Public sector institutions	218,025	67,960	150,065	220.8%
Non-bank financial institutions	3,480,807	3,770,228	(289,421)	(7.7%)
Gross loans and advances	93,207,076	87,859,760	5,347,316	6.1%

The gross portfolio of loans and advances to corporate Customers (excluding farmers), measured at fair value, amounted to PLN 41,500,062 thousand (up by PLN 4,625,287 thousand or 12.5% year on year). Their share in the loan portfolio measured at fair value as at 31 December 2025 was 44.5% (+2.6 p.p. year on year). Overdrafts represent 41.2% of this portfolio (+1.7 p.p. year on year)

Gross loans and advances to individual Customers as at 31 December 2025 amounted to PLN 34,428,276 thousand (up by PLN 1,570,183 thousand or 4.8% year on year). Their share in the loan portfolio measured at amortised cost was 36.9% as at 31 December 2025 (down 0.5 p.p. year on year). Mortgage loans, which amounted to PLN 21,335,075 thousand as at 31 December 2025, accounted for 62.0% of the credit exposure of individual Customers (+0.5 p.p. year on year). In the portfolio of mortgage loans, 98.7% were loans granted in PLN, while 1.2% were loans granted in CHF (the share of CHF loans fell by 0.8 p.p. year on year).



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



The volume of loans granted to individual farmers as at 31 December 2025 amounted to PLN 7,296,966 thousand and decreased by PLN 472,114 thousand i.e. 6.1% year on year.

Lease receivables amounted to PLN 6,282,940 thousand (down 3.6% year on year). Their share in the loan portfolio measured at amortised cost was 6.7% as at 31 December 2025 (compared with 7.4% as at 31 December 2024).

The volume of loans granted to non-bank financial entities and public sector institutions totalled PLN 3,698,832 thousand (down 3.6% year on year). Their share in the loan portfolio measured at amortised cost in 2025 was 4.0% (compared with 4.4% as at 31 December 2024).

Quality of the loan portfolio

The share of Stage 3 and POCI non-performing exposures in gross loans and advances to Customers measured at amortised cost decreased by 0.4 p.p. year on year and stood at 2.8% as at 31 December 2025. The provision coverage of these exposures as at 31 December 2025 was 54.1% (up 0.1 p.p. year on year).

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

PLN'000	31.12.2025	31.12.2024	change	
			PLN'000	%
Gross loans and advances to Customers, total	93,207,076	87,859,760	5,347,316	6.1%
Allowance for receivables	(2,319,398)	(2,458,244)	138,846	(5.6%)
Net loans and advances to Customers, total	90,887,678	85,401,516	5,486,162	6.4%
Gross loans and advances granted to Customers in Stage 1 & 2, and POCI performing				
Gross balance sheet exposure	90,605,379	85,012,162	5,593,217	6.6%
Allowance	(912,671)	(921,184)	8,513	(0.9%)
Net balance sheet exposure	89,692,708	84,090,978	5,601,730	6.7%
Gross loans and advances granted to Customers in Stage 3 and POCI non-performing				
Gross balance sheet exposure	2,601,697	2,847,598	(245,901)	(8.6%)
Impairment allowance	(1,406,727)	(1,537,060)	130,333	(8.5%)
Net balance sheet exposure	1,194,970	1,310,538	(115,568)	(8.8%)

Indicators	31.12.2025	31.12.2024	change
Share of Stage 3 and POCI non-performing in the gross portfolio	2.8%	3.2%	(0.4 p.p.)
Provision coverage of Stage 3 and POCI non-performing exposures	54.1%	54.0%	+0.1 p.p.



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

PLN'000	31.12.2025			31.12.2024		
	total gross	NPL*	% share	total gross	NPL*	% share
Corporate Customers excluding farmers	41,500,062	1,467,281	3.5%	36,874,775	1,529,666	4.1%
Farmers	7,296,966	268,375	3.7%	7,769,080	405,438	5.2%
Individual Customers	34,428,276	655,765	1.9%	32,858,093	715,412	2.2%
- mortgage loans	21,335,075	256,086	1.2%	20,207,062	288,465	1.4%
PLN	21,062,351	157,108	0.7%	19,779,708	172,862	0.9%
foreign currency	272,724	98,978	36.3%	427,354	115,603	27.1%
- cash loans	8,604,762	297,580	3.5%	8,487,233	320,712	3.8%
- other retail loans	4,488,439	102,099	2.3%	4,163,798	106,235	2.6%
Leasing receivables	6,282,940	207,186	3.3%	6,519,624	187,807	2.9%
Public sector institutions	218,025	-	-	67,960	-	-
Non-bank financial entities	3,480,807	3,090	0.1%	3,770,228	9,275	0.2%
Gross loans and advances	93,207,076	2,601,697	2.8%	87,859,760	2,847,598	3.2%

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

The value of collateral held for Customer loans as at 31 December 2025 amounted to PLN 1,592,896 thousand (PLN 1,792,387 thousand as at 31 December 2024). Details of collateral held are presented in Note 54.2. of the Consolidated Financial Statements for the year ended 31 December 2025.

Securitisation of a loan portfolio

On 28 March 2024, the Bank entered into an agreement with International Finance Corporation ("IFC", "Investor") for a synthetic securitisation transaction 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 was to release capital that the Bank allocated to financing of 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 2025, the value of the portfolio of transactions included in the balance sheet and off-balance sheet amounted to PLN 213,638 thousand.

The transaction completion date under the agreement was 31 December 2031 but the securitisation transaction was closed on 10 January 2026 as the time-call option was exercised.

The risk transfer of the securitised portfolio was effected through a credit protection instrument in the form of a financial guarantee issued by the Investor for up to PLN 19,377 thousand as at 31 December 2025. Costs on account of this guarantee are presented in Fee and commission expenses - Guarantees and documentary transactions.

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

The Bank was the arranger of the transaction.

Liabilities and equity

As at 31 December 2025, the Group's total liabilities amounted to PLN 163,126,956 thousand, up by PLN 10,981,423 thousand or 7.2% year on year. The share of liabilities in the Group's total liabilities and equity was 90.3% as at 31 December 2025 (90.8% as at 31 December 2024).

Amounts due to Customers are the predominant liabilities category. They stood at PLN 141,338,836 thousand as at 31 December 2025 (up by PLN 10,414,082 thousand i.e. 8.0% year on year) and represented 86.6% of total liabilities (up by 0.6 p.p. year on year). The second largest liabilities category are amounts due to banks which stood at PLN 10,145,231 thousand as at 31 December 2025 (down by PLN 150,429 thousand i.e. 1.5% year on year). Their share was 6.2% as at 31 December 2025 (down by 0.4 p.p. year on year). A new liabilities line are liabilities under issued debt securities including subordinated issuances (capital bonds), which stood at PLN 4,226,368 thousand as at 31 December 2025 and their share in total liabilities was 2.6%.

The Group's equity stood at PLN 17,598,308 thousand as at 31 December 2025, up by PLN 2,204,252 thousand i.e. 14.3% year on year. The share of equity in total liabilities and equity of the Group was 9.7% as at 31 December 2025 (9.2% as at 31 December 2024).

Table 36. Liabilities and equity

PLN'000	31.12.2025	31.12.2024	change	
			PLN'000	%
Amounts due to the Central Bank	-	-	-	-
Amounts due to other banks	10,145,231	9,994,802	150,429	1.5%
Derivative financial instruments	2,276,575	2,311,741	(35,166)	(1.5%)
Differences from hedge accounting	320,087	260,025	60,062	23.1%
Amounts due to Customers	141,338,836	130,924,754	10,414,082	8.0%



PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Liabilities under issued debt securities (including subordinated issuances)	4,226,368	-	4,226,368	-
Subordinated liabilities	-	3,420,128	(3,420,128)	(100.0%)
Leasing liabilities	553,436	606,306	(52,870)	(8.7%)
Other liabilities	2,048,795	2,296,756	(247,961)	(10.8%)
Current tax liabilities	177,971	361,641	(183,670)	(50.8%)
Provisions	2,039,657	1,969,380	70,277	3.6%
Total liabilities	163,126,956	152,145,533	10,981,423	7.2%
Share capital	147,880	147,800	80	0.1%
Supplementary capital	9,180,883	9,155,136	25,747	0.3%
Other reserve capital	4,672,514	4,042,815	629,699	15.6%
AT1 Capital bonds	650,000	650,000	-	0.0%
Revaluation reserve	(183,796)	(540,845)	357,049	(66.0%)
Retained earnings	3,130,827	1,939,150	1,191,677	61.5%
- retained profit	73,073	(419,118)	492,191	(117.4%)
- net profit for the period	3,057,754	2,358,268	699,486	29.7%
Total equity	17,598,308	15,394,056	2,204,252	14.3%
Total liabilities and equity	180,725,264	167,539,589	13,185,675	7.9%

Amounts due to Customers

As at 31 December 2025, amounts due to Customers stood at PLN 141,338,836 thousand, up by PLN 10,414,082 thousand i.e. 8.0% year on year.

The biggest increase in amounts due to Customers by value was reported for amounts due to corporate Customers, which amounted to PLN 71,765,182 thousand as at 31 December 2025 (up by PLN 4,794,903 thousand i.e. 7.2% year on year). Current accounts increased (by PLN 3,178,068 thousand), as did term deposits (by PLN 1,586,801 thousand i.e. 10.4%). The share of this segment in total amounts due to Customers was 50.8% as at 31 December 2025 vs. 51.2% as at 31 December 2024. Amounts due to individual farmers stood at PLN 4,424,592 thousand as at 31 December 2025, up by PLN 106,309 thousand (2.5%). They accounted for 6.2% of amounts due to corporate Customers (down by 0.2 p.p. year on year).

Amounts due to individual Customers stood at PLN 59,183,277 thousand as at 31 December 2025, up by PLN 3,998,880 thousand (7.2%) year on year, mainly due to an increase in current accounts (up by PLN 3,891,356 thousand i.e. 13.01%). Term deposits decreased modestly by PLN 119,170 thousand i.e. 0.5%. The share of this segment in total amounts due to Customers was 41.9% (42.1% as at 31 December 2024).

Amounts due to non-bank financial entities and public sector institutions increased by PLN 1,188,079 thousand (21.9%) and by PLN 432,220 thousand (13.0%) year on year, respectively. The share of these segments in total amounts due to Customers increased from 4.2% to 4.7% (+0.5 p.p.) for amounts due to non-bank financial institutions and from 2.5% to 2.7% (+0.2 p.p.) for public sector institutions.

Chart 17. Amounts due to Customers - entity structure

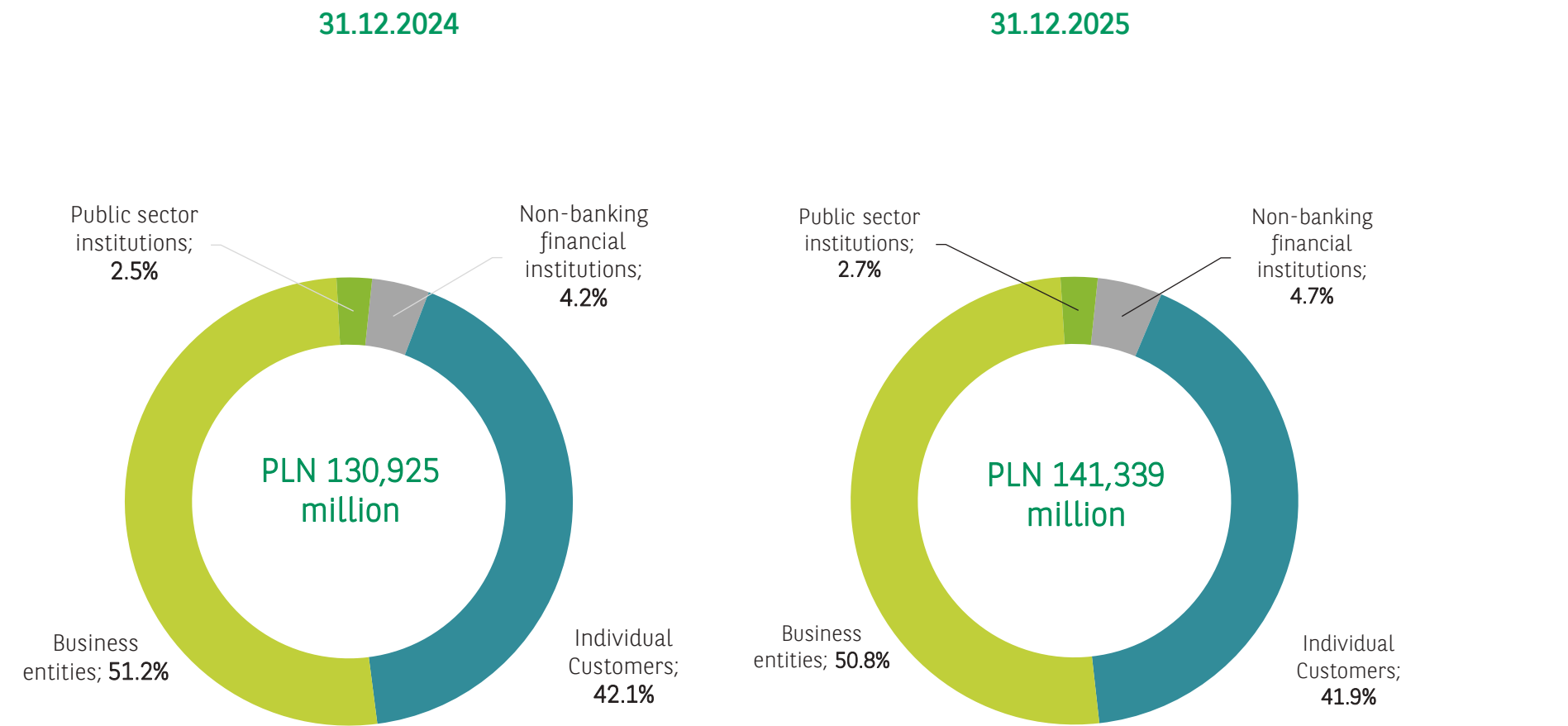




Table 37. Amounts due to Customers by product

	31.12.2025		31.12.2024	
	PLN'000	% share	PLN'000	% share
Current accounts	94,195,640	66.6%	86,301,533	65.9%
Term deposits	45,326,169	32.1%	43,070,184	32.9%
Loans and advances received	450,612	0.3%	449,955	0.3%
Other liabilities	1,366,415	1.0%	1,103,082	0.8%
Amounts due to Customers, including:	141,338,836	100.0%	130,924,754	100.0%
deposits	140,888,224	99.7%	130,474,799	99.7%

The share of current accounts in total amounts due to Customers was 66.6% as at 31 December 2025, up by 0.7 p.p. year on year. Current accounts totalled PLN 94,195,640 thousand, up by PLN 7,894,107 thousand i.e. 9.1%. The increase was driven by an increase in volumes of retail Customers (up by PLN 3,891,356 thousand i.e. 13.1%) and volumes of corporate Customers (up by PLN 3,178,068 thousand i.e. 6.2%). Volumes of public sector institutions and non-bank entities increased by PLN 562,391 thousand and PLN 262,292 thousand, respectively. The share of term deposits in amounts due to Customers was 32.1% as at 31 December 2025, down by 0.8 p.p. year on year. Term deposits increased in value by PLN 2,255,985 thousand to PLN 45,326,169 thousand, i.e. by 5.2% year on year.

The share of other liabilities and loans and advances received in total amounts due to Customers was 1.3%, up 0.1 p.p. year on year. The volume stood at PLN 1,817,027 thousand.

The geographic mix of amounts due to the Bank’s Customers as at 31 December 2025 by key regions (management perspective) is presented below.

Table 38. Geographic structure of amounts due to the Bank’s Customers at the end of 2025

Segment/market	31.12.2025
Retail and Business Banking	56.1%
Białystok	2.8%
Bydgoszcz	2.7%
Gdańsk	3.6%
Katowice	3.1%
Kielce	3.3%

Segment/market	31.12.2025
Kraków	5.0%
Lublin	3.3%
Łódź	3.2%
Olsztyn	2.7%
Poznań	4.3%
Rzeszów	2.9%
Szczecin	2.5%
Warsaw South	3.1%
Warsaw North	7.2%
Wrocław	3.7%
Zielona Góra	2.6%
SME and Corporate Banking	37.2%
East	7.6%
West	7.1%
Strategic Customers Division	22.4%
Other	6.7%

Equity

Equity of the Group stood at PLN 17,598,308 thousand as at 31 December 2025, up by PLN 2,204,252 thousand i.e. 14.3% year on year.

In accordance with Resolution No. 7 of the Annual General Meeting of BNP Paribas Bank Polska S.A. dated 15 April 2025, the Bank distributed the net profit earned in 2024, amounting to PLN 2,320,798 thousand, as follows: PLN 1,162,341 thousand was paid out as a dividend, PLN 658,457 thousand was allocated to the reserve capital, and the remaining amount remained in retained earnings.

The Group’s equity changed also owing to earnings of the period (net profit of 2025 at PLN 3,057,754 thousand, up by PLN 699,486 thousand i.e. 29.7% year on year).



Contingent liabilities

The table below shows contingent liabilities granted and received.

Table 39. Contingent liabilities

PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Contingent commitments granted	43,328,592	36,666,533	6,662,059	18.2%
financial commitments	28,751,150	23,269,197	5,481,953	23.6%
guarantees	14,577,442	13,397,336	1,180,106	8.8%
Contingent commitments received	57,773,732	55,172,867	2,600,865	4.7%
financial commitments	31,000	551,870	(520,870)	(94.4%)
guarantees	57,742,732	54,620,997	3,121,735	5.7%

Long-term contingent liabilities granted stood at PLN 19,058,230 thousand as at 31 December 2025 (PLN 18,152,339 thousand as at 31 December 2024). Long-term contingent liabilities received stood at PLN 51,141,921 thousand as at 31 December 2025 (PLN 49,217,162 thousand as at 31 December 2024).

Own funds and capital ratios

The calculation of the capital adequacy of the Bank and the Group as at 31 December 2025 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 as regards the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements) and amended, among others, by Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 (CRR3) amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor.).

The Group's own funds at 31 December 2025 consisted of:

- Tier 1 capital of PLN 14,105,949 thousand vs. PLN 12,812,053 thousand as at 31 December 2024 (including Common Equity Tier 1 capital of PLN 13,455,949 thousand vs. PLN 12,162,053 thousand as at 31 December 2024 and additional Tier 1 capital (capital bonds worth PLN 650,000 thousand)),
- Tier 2 capital of PLN 3,379,809 thousand vs. PLN 3,150,021 thousand as at 31 December 2024.

Key drivers of own funds in 2025 included:

- addition to consolidated Common Equity Tier 1 capital of the audited consolidated net profit for the period from 1 January 2024 to 31 December 2024 at PLN 1,197,365 thousand (following a decision of the Bank's Annual General Meeting of 15 April 2025 concerning the distribution of the profit of BNP Paribas Bank Polska S.A. for the financial year 2024),
- improvement of unrealised gains and losses measured at fair value through other comprehensive income by PLN 158,939 thousand,
- increase by PLN 7,547 thousand of the adjustment in Common Equity Tier 1 capital related to the deduction of intangible assets, taking into account Commission Delegated Regulation (EU) 2020/2176 of 12 November 2020 as regards the deduction of software assets from Common Equity Tier 1 items,
- reduction of own funds by PLN 24,852 thousand due to deduction of the shortfall in the coverage of non-performing exposures in accordance with Article 36(1)(m) of the CRR,
- issues of Tier 2 instruments in the amount of EUR 160 million and EUR 630 million linked to repayment of partly amortised Tier 2 loans in the amount of EUR 40 million, EUR 60 million, CHF 60 million, CHF 90 million and PLN 2,300 million. This added PLN 78,265 thousand to Tier 2 capital.

Total risk exposure amount as at 31 December 2025 stood at PLN 103,722,212 thousand, up by PLN 10,907,286 thousand year on year. The change was mainly driven by CRR3 which took effect as of 1 January 2025, as well as an increase in total credit risk weighted assets (mainly corporate exposures and mortgage-backed exposures) and total operational risk weighted assets.

As a result, the Group's total capital ratio as at 31 December 2025 stood at 16.86% (down by 0.34 p.p. year on year). The consolidated Common Equity Tier 1 ratio (CET 1) as at 31 December 2025 was 12.97% (down by 0.13 p.p. year on year) and the consolidated Tier 1 ratio of the Group as at 31 December 2025 was 13.60% (down by 0.20 p.p. year on year).

Table 40. Own funds and capital ratios of the Group

PLN'000	31.12.2025	31.12.2024	change y/y PLN'000	%
Common Equity Tier 1 (CET 1)				
- share capital	147,880	147,800	81	0.1%
- supplementary capital	7,259,316	7,259,316	0	0.0%
- reserve capital	5,916,927	5,198,711	718,216	13.8%
- general banking risk fund	627,154	627,154	0	0.0%
- intangible assets	(497,514)	(490,732)	(6,782)	1.4%



PLN'000	31.12.2025	31.12.2024	change y/y	
			PLN'000	%
- other components of own funds, included in the calculation of CET 1	2,186	(580,196)	582,382	(100.4%)
Total CET 1	13,455,949	12,162,053	1,293,896	10.6%
Additional Tier 1 capital	650,000	650,000	0	0.0%
Total Tier 1 capital	14,105,949	12,812,053	1,293,896	10.1%
Supplementary funds (Tier II)				
- subordinated liabilities included in own funds	3,379,809	3,150,021	229,788	7.3%
Total own funds	17,485,758	15,962,074	1,523,684	9.5%
Risk exposure amount due to				
- credit risk	89,675,540	80,634,295	9,041,245	11.2%
- market risks	1,202,181	1,338,766	(136,584)	(10.2%)
- operational risks	12,774,331	10,791,753	1,982,578	18.4%
- credit valuation adjustments	70,160	50,112	20,048	40.0%
Total risk exposure amount	103,722,212	92,814,926	10,907,286	11.8%

Capital ratios of the Group	31.12.2025	31.12.2024	change
Common Equity Tier 1 (CET 1)	12.97%	13.10%	(0.13 p.p.)
Tier 1	13.60%	13.80%	(0.20 p.p.)
Total Capital Ratio (TCR)	16.86%	17.20%	(0.34 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 in an amount equivalent to 0.25% of the total risk exposure amount calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013. On 10 September 2025, the Bank received for information a request from the Polish Financial Supervision Authority regarding an opinion by the Financial Stability Committee on the amendment of the Polish Financial Supervision Authority decision of 4 October 2016, as amended by the Polish Financial Supervision Authority decision of 6 December 2024, concerning imposition on the Bank (on a consolidated and separate basis) of a buffer of other systemically important institution in an amount equivalent to 0.50% of the total risk exposure amount. By its decision of 21 November 2025, the Polish Financial Supervision Authority amended its decision of 4 October 2016 and imposed on the Bank a buffer of other systemically important institution in an amount equivalent to 0.25% 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 1 p.p. as at 31 December 2025. 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 exposures, whose aggregate does not exceed 2 % of the aggregate of the general credit, trading book and securitisation exposures of that institution may be allocated to the institution's home member state. The countercyclical buffer rate for credit exposures in the territory of the Republic of Poland, which applied as at 31 December 2025, was 1% in accordance with the Regulation of the Minister of Finance of 18 September 2024 on the countercyclical buffer rate (Journal of Laws, item 1400).

- Act of 29 August 1997 - Banking Law (Journal of Laws 1997 No. 140 item 939): capital charge recommended under Pillar 2 (P2G) - The Polish Financial Supervision Authority, 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 Polish Financial Supervision Authority and in accordance with the instruction, the total capital charge recommended under Pillar 2 offset by a capital buffer requirement was set at 0.00 p.p. on a separate basis and 0.00 p.p. on a consolidated basis. On 25 November 2025, the Polish Financial Supervision Authority announced that it set no P2G charge for the Bank and the Group following its 2025 Supervisory Stress Tests.

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 Polish Financial Supervision Authority on a consolidated basis are as follows:

Minimum levels of the Group's capital ratios	31.12.2025	31.12.2024	change
Common Equity Tier 1 (CET 1)	8.25%	7.50%	0.75 p.p.
Tier 1	9.75%	9.00%	0.75 p.p.
Total Capital Ratio (TCR)	11.75%	11.00%	0.75 p.p.



As at 31 December 2025, all capital adequacy ratios of the Group were higher than the minimum requirements by:

- 4.72 p.p. for the Common Equity Tier 1 ratio,
- 3.85 p.p. for the Tier 1 ratio,
- 5.11 p.p. for the Total Capital Ratio.

Capital position management

The Group continuously monitors and manages its capital position, including the level of subordinated liabilities classified as own funds, taking into account the current capital adequacy ratios relative to the minimum regulatory requirements, current and projected capital needs, as well as the amortisation profile of Tier 2 instruments.

In 2025, the Group adjusted the structure of its Tier 2 instruments by replacing partially amortised subordinated loans with issuances of 15-year capital bonds. As noted above, these transactions resulted in a slight increase in Tier 2 capital (by PLN 78,265 thousand year on year), while significantly improving the maturity structure of Tier 2 instruments.

The Polish Financial Supervision Authority granted approval for the Bank to classify the capital bonds as Tier 2 instruments: on 11 August 2025 for the series B capital bonds issued on 6 June 2025 with a total nominal value of EUR 160 million, and on 21 November 2025 for the series C capital bonds issued on 10 October 2025 with a total nominal value of EUR 630 million.

On 12 August 2025, the Polish Financial Supervision Authority authorised the Bank to redeem Tier 2 instruments prior to their contractual maturity, including: the subordinated loan dated 10 December 2018 with a total nominal value of EUR 40 million; the subordinated loan dated 15 November 2012, amended on 20 November 2017, with a nominal value of CHF 60 million; and the subordinated loan dated 15 November 2012, amended on 20 November 2017, with a nominal value of EUR 60 million. These prudentially amortised loans were repaid in September 2025.

On 7 November 2025, the Polish Financial Supervision Authority authorised the Bank to redeem Tier 2 instruments prior to their contractual maturity, including: the subordinated loan dated 12 September 2014, amended on 13 September 2019, with a total nominal value of CHF 90 million. On 1 December 2025, the Polish Financial Supervision Authority authorised the Bank to redeem Tier 2 instruments prior to their contractual maturity, including: the subordinated loan dated 7 December 2020 with a total nominal value of PLN 2,300 million. These loans were repaid in November and December 2025, respectively.

Minimum level of own funds and eligible liabilities (MREL)

The MREL requirement applies on a separate basis, hence the details of this requirement are described in the section on the Bank’s Financial results.

Financial ratios

The Group’s return on equity (ROE), calculated based on reported figures, stood at 18.7% as at 31 December 2025 and was up by 1.8 p.p. year on year. Return on assets (ROA), calculated based on reported figures, was 1.8%, up 0.3 p.p. year on year. The improvement in the return ratios was mainly due to the increase in net banking income, effective cost controlling and reduction, lower negative impact of the legal risk of foreign currency mortgage loans, and lower credit risk cost.

The cost/income ratio, calculated based on reported figures, was 41.2% (down 2.1 p.p. year on year). This change was due to income growing faster than costs despite higher regulatory charges (BFG).

The net interest margin calculated in relation to average assets over the year was 3.5% (down by 0.1 p.p. year on year). The decrease in the margin was due to gradual interest rate cuts in 2025.

The low cost of credit risk, as reported and as adjusted (net of the sale of the loan portfolio), reflects the balanced approach to risk management and a very good quality of the Group’s loan portfolio.

The level and evolution of ratios which measure net and gross loans to deposits and sources of funding reflect the good liquidity position observed in 2025 and 2024.

Table 41. Financial ratios

	31.12.2025	31.12.2024	31.12.2023	change 2025/2024
Return on equity	18.7%	16.9%	8.2%	+1.8 p.p.
Adjusted return on equity	18.7%	17.3%	7.7%	+1.5 p.p.
Return on assets	1.8%	1.5%	0.7%	+0.3 p.p.
Adjusted return on assets	1.8%	1.5%	0.6%	+0.3 p.p.
Net interest margin	3.5%	3.6%	3.4%	(0.1 p.p.)
Cost/Income	41.2%	43.2%	42.5%	(2.1 p.p.)
Cost/Income excluding the Bank Guarantee Fund, the Commercial Banks Protection Scheme and the impact of credit holidays	38.8%	41.0%	41.1%	(2.3 p.p.)
Credit risk costs	(0.19%)	(0.28%)	(0.04%)	+0.09 p.p.
Adjusted credit risk costs	(0.23%)	(0.35%)	(0.07%)	+0.12 p.p.
Net loans/Deposits	64.7%	65.8%	68.1%	(1.1 p.p.)
Gross loans/Total sources of financing	60.8%	62.0%	64.0%	(1.1 p.p.)



Alternative Performance Measures

The presented ratios and categories are standard and commonly used in financial analysis. They allow for the assessment and comparison of the Group’s profitability and financial position. The presentation of the level of net profit and ratios as adjusted, i.e. net of 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 Measures

PLN'000 / %	31.12.2025	31.12.2024	31.12.2023	Definitions and assumptions
Net profit	3,057,754	2,358,268	1,012,546	Line in the statement of profit or loss in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the relevant years
Total average equity	16,321,466	13,931,570	12,370,956	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 (line in the statement of financial position in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group)
Return on equity	18.7%	16.9%	8.2%	Net profit to average equity
Adjusted net profit	3,057,754	2,414,542	967,411	Line in the consolidated statement of profit or loss adjusted for the impact of credit holidays (2024: -PLN 69,474 thousand, 2023: +PLN 55,722 thousand; see chapter Consolidated statement of profit or loss). Impact of credit holidays on net profit estimated using the 19% income tax rate
Adjusted total average equity	16,332,721	13,983,442	12,496,227	Average total equity adjusted like net profit, adjustments made for each quarter
Adjusted return on capital	18.7%	17.3%	7.7%	Adjusted net profit to adjusted average total equity
Average total assets	170,077,488	161,180,334	152,411,341	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 (line in the statement of financial position in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group)
Return on assets	1.8%	1.5%	0.7%	Net profit to average total assets
Adjusted average total assets	170,088,743	161,232,207	152,536,612	Average total assets adjusted like net profit, adjustments made for each quarter
Adjusted return on assets	1.8%	1.5%	0.6%	Adjusted net profit to adjusted average total assets
Net interest income	5,892,084	5,741,006	5,225,427	Line in the statement of profit or loss in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the relevant years
Net interest margin	3.5%	3.6%	3.4%	Net interest income to average total assets
Costs	3,368,667	3,351,809	3,095,535	Sum of general administrative expenses and depreciation and amortisation (lines in the statement of profit or loss in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group)
Net banking income	8,184,962	7,752,716	7,282,798	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 (lines in the statement of profit or loss in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group)
Cost/Income	41.2%	43.2%	42.5%	Cost to income
Cost/Income excluding the Bank Guarantee Fund, IPS, and the impact of credit holidays	38.8%	41.0%	41.1%	The costs were adjusted by the costs of fees for the Bank Guarantee Fund and the Commercial Bank Protection Scheme (IPS, see Note General administrative expenses in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group) (2025: PLN 196,335 thousand, 2024: PLN 143,992 thousand, 2023: PLN 123,909 thousand and PN 275 thousand IPS). Income in 2024 adjusted by -PLN 69,474 thousand, in 2023 by +PLN 55,722 thousand of impact of credit holidays (see Consolidated statement of profit or loss).



PLN'000 / %	31.12.2025	31.12.2024	31.12.2023	Definitions and assumptions
Net allowances on expected credit losses of financial assets and provisions for contingent liabilities	(174,499)	(246,192)	(34,369)	Line in the statement of profit or loss in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the relevant years
Average gross loans and advances to Customers measured at amortised cost	90,022,600	88,195,764	89,280,552	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 (line in the Note: Loans and advances to Customers measured at amortised cost in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group)
Credit risk costs	(0.19%)	(0.28%)	(0.04%)	Net allowances on expected credit losses on financial assets and provisions for contingent liabilities to average gross loans and advances to Customers measured at amortised cost
Adjusted net allowances on expected credit losses of financial assets and provisions for contingent liabilities	(202,671)	(305,458)	(60,885)	Net allowances on expected credit losses of financial assets and provisions for contingent liabilities adjusted for the impact of sales of a loan portfolio (2025: +PLN 28,172 thousand, 2024: +PLN 59,266 thousand, 2023: +PLN 26,516 thousand)
Adjusted credit risk costs	(0.23%)	(0.35%)	(0.07%)	Adjusted net allowances on expected credit losses of financial assets and provisions for contingent liabilities to the average balance of gross loans and advances to Customers measured at amortised cost
Net loans	91,173,861	85,854,022	86,248,098	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 – in Notes to the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group. Balances at the end of periods
Deposits	140,888,224	130,474,799	126,713,938	Amounts due to Customers less Loans and advances received from non-bank financial entities – in the Note Amounts due to Customers in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group. Balances at the end of periods
Net loans/Deposits	64.7%	65.8%	68.1%	Net loans to deposits
Loans and advances granted to Customers Stage 3 and POCI non-performing	2,601,697	2,847,598	2,640,799	Lines in the Note: Loans and advances to Customers measured at amortised cost in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group (Tables: Loans and advances 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	93,207,076	87,859,760	88,111,833	Line in the Note: Loans and advances to Customers measured at amortised cost in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group
Share of Stage 3 and POCI non-performing in the gross portfolio	2.8%	3.2%	3.0%	Loans and advances to Customers Stage 3 and POCI non-performing to gross loans and advances to Customers measured at amortised cost, at the end of the period
Impairment allowances (for Stage 3 receivables and POCI non-performing)	1,406,727	1,537,060	1,581,566	Lines in the Note: Loans and advances to Customers measured at amortised cost in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group (Tables: Loans and advances to Customers broken down by Stages and segmentation of POCI loans and advances)
Provision coverage of Stage 3 and POCI non-performing exposures	54.1%	54.0%	59.9%	Impairment allowances (for Stage 3 receivables and POCI non-performing) to Loans and advances to Customers Stage 3 and POCI non-performing



Results of the business segments

Retail and Business Banking

Commercial volumes

As at 31 December 2025, deposits of Retail and Business Banking Customers on a consolidated basis stood at PLN 79,658,247 thousand, up by PLN 6,995,316 thousand i.e. 9.6% year on year. The biggest increase by value was reported for savings accounts (by PLN 2,867,518 thousand i.e. 22.5%) and current accounts (by PLN 2,584,488 thousand i.e. 7.9%). Term deposits increased by PLN 1,235,365 thousand i.e. 4.7% year on year.

The largest category of deposits by maturity are current accounts with a share of 44.5% as at 31 December 2025 (-0.7 p.p. year on year). The share of savings accounts increased by 2.1 p.p. to 19.6% while the share of term deposits decreased (by 1.7 p.p. to 34.8%).

The net portfolio of loans and advances in Retail and Business Banking on a consolidated basis as at 31 December 2025 was PLN 43,784,123 thousand, an increase of PLN 1,355,376 thousand i.e. 3.2% year on year. The biggest increase by value was reported for mortgage loans by PLN 1,161,283 thousand i.e. 5.8%. Consumer loans increased by PLN 513,669 thousand i.e. 4.5% while investment loans increased by PLN 305,975 thousand i.e. 6.8%.

The volume of gross foreign currency housing loans (no longer offered since 2008-2009) was PLN 272,724 thousand as at 31 December 2025 (PLN 427,354 thousand as at 31 December 2024). CHF loans represented 93.2% of the portfolio. The reduction in the portfolio was the result of repayments and settlements with Customers. The portfolio value in CHF decreased by 37.4% year on year. The share of these loans in the total gross loan portfolio measured at amortised cost decreased to 0.3% as at 31 December 2025 (from 0.5% as at 31 December 2024).

Table 43. Retail and Business Banking deposits and loans¹

PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Current accounts	35,443,485	32,858,997	2,584,488	7.9%
Savings accounts	15,614,583	12,747,065	2,867,518	22.5%
Term deposits	27,734,042	26,498,676	1,235,365	4.7%
Overnight	866,137	558,192	307,945	55.2%
Accounts and deposits	79,658,247	72,662,930	6,995,316	9.6%
Consumer loans	11,856,910	11,343,241	513,669	4.5%

¹ The volumes of deposits and loans for selected segments are presented on the basis of management information system data, due to the availability of more detailed product information. To ensure comparability, the data as at 31 December 2024 are presented in accordance with the segmentation applied in 2025. The

PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Investment loans	4,808,021	4,502,047	305,975	6.8%
Overdrafts	3,353,744	3,935,083	(581,339)	(14.8%)
Mortgage loans	21,086,473	19,925,190	1,161,283	5.8%
Leasing receivables	1,898,101	1,894,859	3,242	0.2%
Credit cards	779,415	826,376	(46,961)	(5.7%)
Other loans	1,458	1,951	(492)	(25.2%)
Loans and advances (net)	43,784,123	42,428,747	1,355,376	3.2%

Profit before tax

Retail and Business Banking generated a profit before tax of PLN 1,079,492 thousand in 2025 (PLN 742,607 thousand in 2024), up by PLN 336,885 thousand i.e. 45.4% year on year, mainly due to a lower negative impact of the legal risk of foreign currency loans (improvement by PLN 296,977 thousand i.e. 37.3%).

Net banking income was PLN 3,997,677 thousand in 2025, up by PLN 120,879 thousand i.e. 3.1% year on year. Net interest income and net fee and commission income increased year on year by PLN 61,172 thousand (PLN 1.9%) and by PLN 29,346 thousand (4.4%), respectively.

Net banking income represented 48.7% of the Group's profit in 2025. Personal Finance contributed 21.4% of net banking income of Retail and Business Banking (down by 1.3 p.p. year on year).

As at 31 December 2025, Retail and Business Banking served 2,659,100 Customers (individuals and micro-enterprises). The year-on-year decrease in the number of Customers was the result of a review of the Customer base in 2025, closing of inactive accounts, and changes to the definition of retail Customer: under the new definition, retail Customers have an active contractual relationship.

deposit volume does not include the balances of certain credit institutions which, in management reporting, are treated as interbank deposits, whereas in financial reporting they are recognised under Customer deposits; moreover, the balances do not include accrued but not yet due interest.



Table 44. Profit before tax of the Retail and Business Banking segment²

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change PLN'000	%
Net interest income	3,226,340	3,165,168	61,172	1.9%
Net fee and commission income	701,317	671,971	29,346	4.4%
Net trading and other income	70,020	39,659	30,361	76.6%
Net banking income	3,997,677	3,876,798	120,879	3.1%
Net allowances on expected credit losses	(6,447)	(1,369)	(5,078)	370.9%
Result on legal risk related to foreign currency loans	(498,751)	(795,728)	296,977	(37.3%)
Operating expenses and depreciation and amortisation	(1,322,663)	(1,232,443)	(90,220)	7.3%
Cost allocation	(879,473)	(919,912)	40,439	(4.4%)
Operating profit	1,290,343	927,345	362,998	39.1%
Tax on financial institutions	(210,851)	(184,739)	(26,112)	14.1%
Segment profit before tax	1,079,492	742,606	336,886	45.4%

Bank guarantees

In 2025, the Bank issued 17 bank guarantees for Business Banking Customers in the total amount of PLN 2.2 million.

Corporate and SME Banking

Commercial volumes

Corporate Banking

As at 31 December 2025, deposit of Corporate Banking Customers stood at PLN 43,967,963 thousand, up by PLN 2,711,949 thousand i.e. 6.6% year on year. The share of term deposits in the mix increased (from 22.1% as at 31 December 2024 to

24.5% as at 31 December 2025) while the share of current accounts decreased (from 77.0% as at 31 December 2024 to 74.9% as at 31 December 2025).

The net portfolio of loans and advances in Corporate Banking Customers on a consolidated basis as at 31 December 2025 stood at PLN 32,192,258 thousand, up by PLN 3,177,004 thousand i.e. 10.9% year on year. The biggest increase by value was reported for overdrafts (by PLN 2,388,166 thousand) and investment loans (by PLN 882,357 thousand).

Table 45. Corporate Banking deposits and loans³

PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Current accounts	32,950,982	31,785,313	1,165,669	3.7%
Savings accounts	1,798	2,416	(618)	(25.6%)
Term deposits	10,769,771	9,097,787	1,671,984	18.4%
Overnight	245,412	370,497	(125,085)	(33.8%)
Accounts and deposits	43,967,963	41,256,014	2,711,949	6.6%
Investment loans	18,036,509	17,154,152	882,357	5.1%
Overdrafts	12,080,049	9,691,883	2,388,166	24.6%
Leasing receivables	1,819,250	1,926,914	(107,664)	(5.6%)
Factoring	255,206	239,727	15,479	6.5%
Other loans	1,245	2,578	(1,333)	(51.7%)
Loans and advances (net)	32,192,258	29,015,254	3,177,004	10.9%

Small and Medium-sized Enterprise Banking

As at 31 December 2025, deposits of SME Banking Customers on a consolidated basis stood at PLN 17,014,663 thousand, up by PLN 488,994 thousand i.e. 3.0% year on year. The increase was reported in current accounts, up by PLN 802,043 thousand i.e. 6.3%. This was partly offset by a decrease in term deposits by PLN 280,814 thousand i.e. 7.7%. Current accounts represented 80.1% of deposits of SME Banking Customers and their share increased from 77.6% as at 31 December 2024. The share of term deposits decreased from 21.9% as at 31 December 2024 to 19.7% as at 31 December 2025.

The net portfolio of loans and advances in SME Banking on a consolidated basis remained stable. It stood at PLN 6,054,517 thousand as at 31 December 2025, down modestly by PLN 41,956 thousand (0.7%) year on year. Investment loans increased

² Data based on the segment note included in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2025.

³ The volumes of deposits and loans for selected segments are presented on the basis of management information system data, due to the availability of more detailed product information. To ensure comparability, the data as at 31 December 2024 are presented in accordance with the segmentation applied in 2025. The



by PLN 72,684 thousand while overdrafts decreased (by PLN 67,144 thousand), as did lease receivables (by PLN 47,570 thousand).

Table 46. Small and Medium-sized Enterprise Banking deposits and loans⁴

PLN'000	31.12.2025	31.12.2024	change	
			PLN'000	%
Current accounts	13,632,036	12,829,993	802,043	6.3%
Savings accounts	29,142	53,756	(24,614)	(45.8%)
Term deposits	3,345,309	3,626,124	(280,814)	(7.7%)
Overnight	8,174	15,795	(7,620)	(48.2%)
Accounts and deposits	17,014,663	16,525,668	488,994	3.0%
Investment loans	3,062,090	2,989,406	72,684	2.4%
Overdrafts	2,523,095	2,590,239	(67,144)	(2.6%)
Leasing receivables	467,335	514,905	(47,570)	(9.2%)
Factoring	247	249	(2)	(0.7%)
Other Loans	1,749	1,673	77	4.6%
Loans and advances (net)	6,054,517	6,096,472	(41,956)	(0.7%)

Profit before tax

Corporate Banking

Corporate Banking generated a profit before tax of PLN 1,284,790 thousand in 2025 (PLN 1,310,851 thousand in 2024, down by PLN 26,061 thousand i.e. 2.0% year on year). The decrease in profit before tax was mainly due to lower net banking income (down by PLN 72,543 thousand i.e. 3.1% year on year), partly offset by lower negative impact of impairment (by PLN 44,842 thousand i.e. 21.7% year on year).

Net banking income of Corporate Banking was PLN 2,246,474 thousand, down by PLN 72,543 thousand i.e. 3.1% year on year due to lower net interest income, down by PLN 117,700 thousand i.e. 7.4% year on year. Net fee and commission income

increased by PLN 7,692 thousand i.e. 2.0% year on year while net trading income and other income increased by PLN 37,465 thousand i.e. 10.5%. Net banking income of Corporate Banking contributed 27.4% to the Group's net banking income in 2025.

Operating expenses, depreciation and amortisation, and allocated expenses remained stable at PLN 677,117 thousand in 2025 (+0.1% year on year).

Table 47. Profit before tax of the Corporate Banking segment⁵

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change	
			PLN'000	%
Net interest income	1,464,281	1,581,981	(117,700)	(7.4%)
Net fee and commission income	388,384	380,692	7,692	2.0%
Net trading and other income	393,809	356,344	37,465	10.5%
Net banking income	2,246,474	2,319,017	(72,543)	(3.1%)
Net allowances on expected credit losses	(161,511)	(206,353)	44,842	(21.7%)
Operating expenses and depreciation and amortisation	(491,188)	(449,459)	(41,729)	9.3%
Cost allocation	(185,929)	(227,015)	41,086	(18.1%)
Operating profit	1,407,846	1,436,190	(28,344)	(2.0%)
Tax on financial institutions	(123,056)	(125,339)	2,283	(1.8%)
Segment profit before tax	1,284,790	1,310,851	(26,061)	(2.0%)

SME Banking

SME Banking generated a profit before tax of PLN 475,168 thousand in 2025 (PLN 441,352 thousand in 2024, up by PLN 33,816 thousand i.e. 7.7% year on year). The increase in profit before tax was mainly due to high positive contribution of impairment (+PLN 56,619 thousand in 2025 vs. +PLN 555 thousand in 2024) and lower operating expenses.

Net banking income of SME Banking was PLN 791,721 thousand in 2025, down by PLN 34,729 thousand i.e. 4.2% year in year as a result of lower net interest income (down by PLN 43,842 thousand i.e. 7.1% year on year) and lower net fee and commission income (down by PLN 4,087 thousand i.e. 3.1% year on year) combined with an increase in net trading income

⁴ The volumes of deposits and loans for selected segments are presented on the basis of management information system data, due to the availability of more detailed product information. To ensure comparability, the data as at 31 December 2024 are presented in accordance with the segmentation applied in 2025. The deposit volume does not include the balances of certain credit institutions which, in management reporting, are treated as interbank deposits, whereas in financial reporting they are recognised under Customer deposits; moreover, the balances do not include accrued but not yet due interest.

⁵ Data based on the segment note included in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2025.



and other income by PLN 13,200 thousand i.e. 17.9%. Net banking income of SME Banking contributed 9.7% to the Group’s net banking income in 2025.

Operating expenses, depreciation and amortisation, and allocated expenses in 2025 decreased by PLN 18,017 thousand i.e. 5.0% year on year.

Table 48. Profit before tax of the Small and Medium-sized Enterprises Banking segment⁶

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change PLN'000	%
Net interest income	577,160	621,002	(43,842)	(7.1%)
Net fee and commission income	127,683	131,770	(4,087)	(3.1%)
Net trading and other income	86,878	73,678	13,200	17.9%
Net banking income	791,721	826,450	(34,729)	(4.2%)
Net allowances on expected credit losses	56,619	555	56,064	10,101.6%
Operating expenses and depreciation and amortisation	(106,491)	(130,377)	23,886	(18.3%)
Cost allocation	(234,928)	(229,059)	(5,869)	2.6%
Operating profit	506,921	467,570	39,351	8.4%
Tax on financial institutions	(31,753)	(26,218)	(5,535)	21.1%
Segment profit before tax	475,168	441,352	33,816	7.7%

Bank guarantees

With guarantees and letters of credit, the Bank offers quick and comprehensive service based on dedicated IT solutions.

In 2025, by order of Customers of:

- **Corporate Banking**, the Bank issued 5,794 bank guarantees in a total amount of PLN 4,042.9 million, opened 900 import letters of credit in a total amount of PLN 606.4 million, and processed 314 export letters of credit in a total amount of PLN 804.5 million issued by third-party banks to Customers,
- **SME Banking**, the Bank issued 651 bank guarantees in a total amount of PLN 174.5 million, opened 76 import letters of credit in a total amount of PLN 20.2 million, and processed 48 export letters of credit in a total amount of PLN 43.2 million issued by third-party banks to Customers.

⁶ Data based on the segment note included in the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2025.



Financial results of the Bank

Separate statement of profit or loss

BNP Paribas Bank Polska S.A. generated a net profit of PLN 3,012,195 thousand in 2025, up by PLN 691,397 thousand i.e. 29.8% year on year.

The Bank's net banking income in 2025 stood at PLN 7,979,642 thousand, up by PLN 417,959 thousand i.e. 5.5% year on year. Significant factors influencing net banking income in 2025 and in 2024 included macroeconomic conditions and the interest rate policy of central banks, impacting among others Customers' economic activity and the situation on the financial markets. The key factors driving the Bank's results included:

- NBP interest rates. From October 2023 until early May 2025, the NBP interest rates remained unchanged (5.75% for the reference rate). In 2025, the Monetary Policy Council (RPP) introduced six rate cuts, bringing the reference rate down to 4.00%. These reductions contributed to lower profitability of PLN loans with variable interest rates in 2025 compared with 2024. A potential continuation of rate cuts in 2026 would negatively affect PLN margins generated by banks,
- the monetary policy easing cycle launched by the European Central Bank in June 2024. By the end of July 2025, nine rate cuts had been implemented, reducing the deposit facility rate by 200 bps (to 2.0%). These changes lowered the profitability of variable rate loans granted in EUR,
- a strong liquidity position of Customers, leading to an increase in deposit volumes, enabling further growth in the scale of operations,
- the absence of a negative impact on the 2025 net interest income from the amendment to the statutory mortgage payment holiday scheme, which took effect in mid-May 2024,
- volatility in financial markets, including fluctuations in the PLN exchange rate against major currencies in the first half of 2025, driven among other factors by geopolitical conditions (including U.S. trade policy) and political uncertainty (including the presidential election in Poland). This volatility increased Customer demand for hedging instruments, positively impacting banks' financial results,
- favourable market conditions and rising stock prices on the Warsaw Stock Exchange, combined with declining deposit interest rates, which supported Customer interest in asset management and brokerage services and contributed to higher fee and commission income for banks.

Net interest income, which is the biggest item of net banking income, stood at PLN 5,780,421 thousand in 2025, up by PLN 148,608 thousand (2.6%) year on year. Despite falling profitability of loans, this was possible thanks to gains on liquidity invested in securities and financial instruments, higher interest income on hedging derivatives, and optimised cost of deposits.

The net banking income item to improve the most was net trading income, which stood at PLN 1,076,959 thousand in 2025 (up by PLN 211,752 thousand or 24.5% year on year). The improvement was driven among others by higher gains on financial instrument transactions in asset and liability management, higher gains on margins on currency exchange and derivatives transactions with Customers (including several large transactions with Customers in H1 2025), and improved gains on equity investments.

The negative impact of the legal risk of court cases concerning foreign currency mortgage loans remains a significant factor affecting the Group's net profit. In 2025, thanks to gradual reduction of the portfolio and an observed decrease in the number of new court cases, the charge to the Group's results was PLN 498,751 thousand, down by PLN 296,977 thousand year on year.

The quality of the loan portfolio remained strong in 2025, as confirmed by lower migration to Stage 3 and recovery on non-performing loans combined with no additional provisions for expected future materialisation of the cost of risk in the institutional portfolio (Post Model Adjustment), which had been set up in 2024. As a result, the negative impact on provisions for expected credit losses on financial assets and provisions for contingent liabilities stood at PLN 155,350 thousand in 2025, compared to a negative impact of PLN 225,350 thousand in 2024 (improvement by PLN 70,000 thousand).

General administrative expenses, depreciation and amortisation stood at PLN 3,240,933 thousand in 2025, up by only PLN 8,938 thousand (0.3%) year on year, despite an increase in the total cost of the Bank Guarantee Fund by PLN 52,343 thousand (net of the BFG cost, total costs would have decreased by PLN 43,405 thousand, i.e. 1.4%). General administrative expenses in 2025 were positively impacted by a review of the cost base, in particular the costs of advisory services, including services provided by the Group, and the costs of legal advisory on the CHF mortgage loan portfolio.

A change of the corporate income tax rate under the Act amending the Corporate Income Tax Act and the Act on Tax on Certain Financial Institutions adopted in Q4 2025 resulted in reevaluation of the deferred tax asset and liability using the future tax rates. The positive impact of the reevaluation on the Group's result as at 31 December 2025 was PLN 174,116 thousand, recognised by the Group in Q4 2025.

A positive financial impact of deferred tax, based on provisions against future payments relating to the cancellation of CHF loans, was recognised at PLN 135,535 thousand in 2024.



Table 49. Statement of profit or loss

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Net interest income	5,780,421	5,631,813	148,608	2.6%
Net fee and commission income	1,181,514	1,188,293	(6,779)	(0.6%)
Dividend income	18,118	13,147	4,971	37.8%
Net trading income	1,076,959	865,207	211,752	24.5%
Result on investment activities	(2,340)	14,374	(16,714)	-
Result on hedge accounting	(11,161)	1,946	(13,107)	-
Result on derecognition of financial assets measured at amortized cost due to significant modification	(19,698)	(35,739)	16,041	(44.9%)
Other operating income and expenses	(44,171)	(117,358)	73,187	(62.4%)
Net banking income	7,979,642	7,561,683	417,959	5.5%
Net allowances on expected credit losses on financial assets and provisions for contingent liabilities	(155,350)	(225,350)	70,000	(31.1%)
Result on legal risk related to foreign currency loans	(498,751)	(795,728)	296,977	(37.3%)
General administrative expenses	(2,712,043)	(2,717,137)	5,094	(0.2%)
Depreciation and amortisation	(528,890)	(514,858)	(14,032)	2.7%
Operating profit	4,084,608	3,308,610	775,998	23.5%
Tax on financial institutions	(393,352)	(404,971)	11,619	(2.9%)
Profit before tax	3,691,256	2,903,639	787,617	27.1%
Income tax expenses	(679,061)	(582,841)	(96,220)	16.5%
Net profit	3,012,195	2,320,798	691,397	29.8%

Note: Due to rounding, individual values presented in the tables and charts of these Financial Statements may not sum up.

Net interest income

Net interest income, which is the Bank's biggest revenue stream, stood at PLN 5,780,421 thousand in 2025, up by PLN 148,608 thousand i.e. 2.6% year on year. Interest income in 2025 was down by PLN 322,270 thousand i.e. 3.3% year on year while interest expenses went down by PLN 470,878 thousand i.e. 11.0%.

Table 50. Net interest income

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Amounts due from banks	512,156	423,790	88,366	20.9%
Loans and advances to Customers measured at amortised cost	5,999,884	6,404,285	(404,401)	(6.3%)
Loans and advances to Customers measured at fair value through profit or loss	29,955	50,227	(20,272)	(40.4%)
Debt instruments measured at amortised cost	1,335,267	972,653	362,614	37.3%
Debt instruments measured at fair value through profit or loss	5,216	7,466	(2,250)	(30.1%)
Debt instruments measured at fair value through other comprehensive income	922,091	850,362	71,729	8.4%
Derivative instruments as part of fair value hedge accounting	737,283	854,393	(117,110)	(13.7%)
Derivative instruments as part of cash flow hedge accounting	39,312	11,628	27,684	238.1%
Repo transactions	2,003	330,633	(328,630)	(99.4%)
Total interest income	9,583,167	9,905,437	(322,270)	(3.3%)
Amounts due to banks	(399,902)	(496,001)	96,099	(19.4%)
Liabilities under issued debt securities	(42,071)	-	(42,071)	-
Amounts due to Customers	(2,275,268)	(2,436,587)	161,319	(6.6%)
Lease liabilities	(20,748)	(23,274)	2,526	(10.9%)



PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Derivative instruments as part of fair value hedge accounting	(980,603)	(1,275,490)	294,887	(23.1%)
Derivative instruments as part of cash flow hedge accounting	(63,816)	(36,561)	(27,255)	74.5%
Repo transactions	(20,338)	(5,711)	(14,627)	256.1%
Others related to financial assets	-	-	-	-
Total interest expense	(3,802,746)	(4,273,624)	470,878	(11.0%)
Net interest income	5,780,421	5,631,813	148,608	2.6%

Net fee and commission income

The Bank's net fee and commission income was PLN 1,181,514 thousand in 2025, down by PLN 20,997 thousand i.e. 1.7% year on year. The decrease was mainly due to lower income on loans in Retail and Business Banking, including loans to farmers, lower income on settlements with Cardif in respect of sales of life insurance linked to cash loans and mortgage loans, and income on bank accounts.

Table 51. Net fee and commission income

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Fee and commission income				
loans, advances and leases	251,909	269,543	(17,634)	(6.5%)
account maintenance	223,030	232,545	(9,515)	(4.1%)
cash service	30,353	31,462	(1,109)	(3.5%)
cash transfers and e-banking	101,898	108,047	(6,149)	(5.7%)
guarantees and documentary operations	76,384	77,320	(936)	(1.2%)
asset management and brokerage operations	118,389	103,118	15,271	14.8%
payment and credit cards	423,611	414,307	9,304	2.2%

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
insurance mediation activity	137,856	148,945	(11,089)	(7.4%)
product sale mediation and Customer acquisition	22,185	23,781	(1,596)	(6.7%)
other commissions	53,861	57,990	(4,129)	(7.1%)
Total fee and commission income	1,439,476	1,467,058	(27,582)	(1.9%)
Fee and commission expense				
loans, advances and leases	(458)	(998)	540	(54.1%)
account maintenance	(9,398)	(9,774)	376	(3.8%)
cash service	(30,466)	(28,566)	(1,900)	6.7%
cash transfers and e-banking	(3,369)	(2,765)	(604)	21.8%
guarantees and documentary transactions	(4,337)	(9,120)	4,783	(52.4%)
asset management and brokerage operations	(7,279)	(5,428)	(1,851)	34.1%
payment and credit cards	(108,468)	(121,800)	13,332	(10.9%)
insurance mediation activity	(19,692)	(21,487)	1,795	(8.4%)
product sale mediation and Customer acquisition	(23,742)	(23,011)	(731)	3.2%
other commissions	(50,753)	(55,816)	5,063	(9.1%)
Total fee and commission expenses	(257,962)	(278,765)	20,803	(7.5%)
Net fee and commission income	1,181,514	1,188,293	(6,779)	(0.6%)

Dividend income

Dividend income in 2025 totalled PLN 18,118 thousand and was paid from the profits of companies for 2024 in which the Bank held a minority interest, i.e.: among others, Biuro Informacji Kredytowej S.A. (PLN 4,251 thousand), Krajowa Izba Rozliczeniowa S.A. (PLN 2,473 thousand), VISA (PLN 328 thousand) and Mastercard (PLN 125 thousand).

Dividend income in 2024 totalled PLN 13,147 thousand and was paid 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).



Net trading income and result on investment activities

Net trading income was PLN 1,076,959 thousand in 2025, up by PLN 211,752 thousand i.e. 24.5% year on year. 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 **result on investment activities** in 2025 was PLN 673 thousand, down by PLN 16,714 thousand i.e. 16.3% year on year.

Other operating income

Other operating income was PLN 206,186 thousand in 2025, up by PLN 89,556 thousand i.e. 76.8% year on year.

Table 52. Other operating income

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
Sale or liquidation of property, plant and equipment and intangible assets	32,579	19,233	13,346	69.4%
Impairment allowances on other receivables	5,011	7,907	(2,896)	(36.6%)
Sale of goods and services	17,592	8,651	8,941	103.4%
Release of provisions for litigation and claims and other liabilities	83,212	19,460	63,752	327.6%
Recovery of debt enforcement costs	18,039	19,723	(1,684)	(8.5%)
Recovered compensation	-	-	-	-
Leasing operations	15,555	18,940	(3,385)	(17.9%)
Other operating income	34,198	36,934	(2,736)	(7.4%)
Total other operating income	206,186	130,848	75,338	57.6%

Other operating costs

Other operating costs stood at PLN 250,357 thousand in 2025, up by PLN 2,151 thousand i.e. 0.9% year on year.

Table 53. Other operating expenses

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y	
			PLN'000	%
Loss on sale or liquidation of property, plant and equipment and intangible assets	(10,095)	(13,614)	3,519	(25.8%)
Impairment allowances on other receivables	(6,893)	(10,836)	3,943	(36.4%)
Provisions for litigation and claims and branches restructuring	(48,051)	(59,407)	11,356	(19.1%)
Debt enforcement	(31,993)	(36,200)	4,207	(11.6%)
Donations made	(9,304)	(7,779)	(1,525)	19.6%
Costs of leasing operations	(12,278)	(20,318)	8,040	(39.6%)
Costs of compensations, penalties and fines	-	-	-	-
Other operating expenses	(131,743)	(100,052)	(31,691)	31.7%
Total other operating expenses	(250,357)	(248,206)	(2,151)	0.9%



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 2025 stood at a negative PLN 155,350 thousand compared to a negative PLN 225,350 thousand in 2024 (improvement by PLN 70,000 thousand i.e. 31.1% year on year).

In 2025, the Bank entered into agreements to sell retail, SME and corporate portfolios. The gross carrying amount of the sold portfolio measured at amortised cost was PLN 273,916 thousand, the amount of impairment allowances created was PLN 219,696 thousand. The contractual price for the sale of these portfolios was set at PLN 82,392 thousand. The net impact on the Bank’s result due to the sale of portfolios amounted to PLN 28,172 thousand and is presented under Net allowances on expected credit losses of financial assets and provisions for contingent liabilities.

In 2024, the Bank entered into agreements to sell 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 allowances 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 under Net allowances on expected credit losses of financial assets and provisions for contingent liabilities.

The cost of credit risk, measured as the result on allowances to the average gross loans and advances to Customers measured at amortised cost (calculated on the basis of balances at the end of each quarter), was 0.18% in 2025 compared with 0.27% in 2024. Net of the impact of the sale of loans, the estimated cost of risk would be 0.21% in 2025 and 0.34% in 2024.

General administrative expenses, depreciation and amortisation

General administrative expenses (combined with depreciation and amortisation) of the Bank stood at PLN 3,240,933 thousand in 2025, up by PLN 8,939 thousand i.e. 3.0% year on year.

Table 54. General administrative expenses and depreciation and amortisation

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000 %	
Personnel expenses	(1,586,863)	(1,528,680)	(58,183)	3.8%
Marketing	(121,595)	(103,893)	(17,702)	17.0%
IT and telecom expenses	(334,468)	(305,169)	(29,299)	9.6%
Short-term leases and exploitation	(88,863)	(82,622)	(6,241)	7.6%
Other non-personnel expenses	(141,122)	(148,261)	7,139	(4.8%)
External services under other contracts and consulting	(93,460)	(265,940)	172,480	(64.9%)

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000 %	
Business travel	(12,107)	(11,631)	(476)	4.1%
Vehicle maintenance costs	(28,397)	(26,107)	(2,290)	8.8%
ATM and cash handling expenses	(31,448)	(29,952)	(1,496)	5.0%
Costs of outsourcing services related to leasing operations	(918)	(1,445)	527	(36.5%)
Court and notary fees	(53,626)	(49,366)	(4,260)	8.6%
Bank Guarantee Fund fee	(196,335)	(143,992)	(52,343)	36.4%
Commercial Bank Protection Scheme fee	-	-	-	-
Cost of PFSA supervision	(22,841)	(20,079)	(2,762)	13.8%
Total general administrative expenses	(2,712,043)	(2,717,137)	5,094	(0.2%)
Depreciation and amortisation	(528,890)	(514,858)	(14,032)	2.7%
Total expenses	(3,240,933)	(3,231,995)	(8,938)	0.3%

Table 55. Personnel expenses

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000 %	
Payroll expenses	(1,265,223)	(1,226,044)	(39,179)	3.2%
Payroll charges	(228,361)	(218,156)	(10,205)	4.7%
Employee benefits	(58,456)	(58,002)	(454)	0.8%
Costs of restructuring provision	(1,904)	(649)	(1,255)	193.4%
Costs of provision for future liabilities arising from unused annual leave and retirement benefits	(5,966)	(5,237)	(729)	13.9%
Appropriations to Social Benefits Fund	(23,160)	(19,074)	(4,086)	21.4%
Other	(3,793)	(1,518)	(2,275)	149.9%
Total personnel expenses	(1,586,863)	(1,528,680)	(58,183)	3.8%



The Bank's capital expenditure amounted to PLN 442,242 thousand in 2025 and was stable year on year (PLN 442,757 thousand in 2024). The expenditure mix changed. Expenditure increased year on year in 2025 for computer hardware by PLN 20,809 thousand and leasehold improvements by PLN 7,424 thousand. At the same time, expenditure on external staff costs decreased by PLN 14,524 thousand and expenditure for intangible assets decreased by PLN 7,869 thousand. Capital expenditure is aligned with 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 comprehensive income

The Bank's total comprehensive income in 2025 amounted to PLN 3,369,278 thousand, an increase of PLN 1,022,600 thousand, or 43.6%, compared with 2024 (PLN 2,346,678 thousand). The increase in comprehensive income was driven by:

- an increase in net profit by PLN 691,397 thousand, i.e. 29.8% year on year,
- valuation of financial assets measured through other comprehensive income (improvement by PLN 303,531 thousand);
- valuation of cash flow hedging derivatives (improvement by PLN 88,283 thousand).

Table 56. Statement of comprehensive income

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Net profit	3,012,195	2,320,798	691,397	29.8%
Other comprehensive income				
Items that may be reclassified subsequently to profit or loss upon fulfilment of certain conditions	356,033	27,255	328,778	1,206.3%
Measurement of financial assets measured at fair value through other comprehensive income, gross	347,318	43,787	303,531	693.2%
Deferred income tax on the valuation of gross financial assets measured through other comprehensive income	(56,160)	(8,320)	(47,840)	575.0%
Measurement of cash flow hedge accounting derivatives	78,145	(10,138)	88,283	-
Deferred income tax on valuation of gross derivatives hedging cash flows	(13,270)	1,926	(15,196)	-
Items that will not be reclassified to profit or loss	1,050	(1,375)	2,425	(176.4%)

PLN'000	12 months ended 31.12.2025	12 months ended 31.12.2024	change y/y PLN'000	%
Actuary valuation of employee benefits	1,576	(1,698)	3,274	(192.8%)
Deferred income tax on actuarial valuation of gross personnel expenses	(526)	323	(849)	(262.8%)
Other comprehensive income (net)	357,083	25,880	331,203	1,279.8%
Total comprehensive income	3,369,278	2,346,678	1,022,600	43.6%

Statement of financial position

Assets

The Bank's total assets as at 31 December 2025 stood at PLN 176,310,134 thousand, up by PLN 13,222,633 i.e. 8.1% year on year.

Table 57. Assets

PLN'000	31.12.2025	31.12.2024	change PLN'000	%
Cash and balances at Central Bank	10,224,866	11,325,551	(1,100,685)	(9.7%)
Amounts due from banks	11,524,131	7,789,297	3,734,834	47.9%
Derivative financial instruments	2,359,460	2,440,116	(80,656)	(3.3%)
Differences from hedge accounting	345,550	230,658	114,892	49.8%
Loans and advances to Customers measured at amortised cost	86,786,401	81,189,258	5,597,143	6.9%
Loans and advances to Customers measured at fair value through profit or loss	286,183	452,506	(166,323)	(36.8%)
Securities measured at amortised cost	36,180,626	32,364,550	3,816,076	11.8%
Securities measured at fair value through profit or loss	240,409	320,925	(80,516)	(25.1%)



PLN'000	31.12.2025	31.12.2024	change	
			PLN'000	%
Securities at fair value through other comprehensive income	24,719,802	23,027,454	1,692,348	7.3%
Intangible assets	965,224	978,163	(12,939)	(1.3%)
Property, plant and equipment	947,435	946,796	639	0.1%
Deferred tax assets	710,964	685,634	25,330	3.7%
Current income tax assets	-	-	-	-
Other assets	910,657	1,228,167	(317,510)	(25.9%)
Total assets	176,310,134	163,087,501	13,222,633	8.1%

Loan portfolio

Loan portfolio structure

As at 31 December 2025, gross loans and advances to Customers (the sum of portfolios measured at amortised cost and measured at fair value) stood at PLN 89,322,538 thousand, up by PLN 5,273,494 thousand i.e. 6.3% year on year.

Table 58. Structure of the loan portfolio measured at amortised cost

PLN'000	31.12.2025		31.12.2024	
	total gross	% share	total gross	% share
Corporate Customers, excluding farmers	40,807,638	45.9%	36,190,293	43.3%
Farmers	7,296,966	8.2%	7,769,080	9.3%
Retail Customers	34,428,276	38.7%	32,858,093	39.3%
- mortgage loans	21,335,075	24.0%	20,207,062	24.2%
PLN	21,062,351	23.7%	19,779,708	23.7%
foreign currency	272,724	0.3%	427,354	0.5%
- cash loans	8,604,762	9.7%	8,487,233	10.2%
- other retail loans	4,488,439	5.0%	4,163,798	5.0%
Lease receivables	96,632	0.1%	151,860	0.2%

PLN'000	31.12.2025		31.12.2024	
	total gross	% share	total gross	% share
Public sector institutions	218,025	0.2%	67,960	0.1%
Non-bank financial entities	6,122,520	6.9%	6,484,263	7.8%
Gross loans and advances	88,970,057	100.0%	83,521,549	100.0%

Quality of the loan portfolio

The share of Stage 3 and POCI non-performing exposures in gross loans and advances to Customers measured at amortised cost stood at 2.7% as at 31 December 2025, a decrease by 0.5 p.p. year on year The provision coverage of impaired exposures as at 31 December 2025 was 56.1% (up 0.3 p.p. year on year).

Table 59. Coverage of the loan portfolio measured at amortised cost with impairment losses

PLN'000	31.12.2025	31.12.2024	change	
			PLN'000	%
Gross loans and advances to Customers, total	88,970,057	83,521,549	5,448,508	6.5%
Allowances for receivables	(2,183,656)	(2,332,291)	148,635	(6.4%)
Net loans and advances to Customers, total	86,786,401	81,189,258	5,597,143	6.9%
Non-impaired exposures (Stage 1 and 2) and POCI performing				
Gross balance sheet exposure	86,606,901	80,886,813	5,720,088	7.1%
Allowance	(857,073)	(860,335)	3,262	(0.4%)
Net balance sheet exposure	85,749,828	80,026,478	5,723,350	7.2%
Impaired exposures (Stage 3) and POCI non-performing				
Gross balance sheet exposure	2,363,156	2,634,736	(271,580)	(10.3%)
Impairment allowance	(1,326,583)	(1,471,956)	145,373	(9.9%)
Net balance sheet exposure	1,036,573	1,162,780	(126,207)	(10.9%)



Indicators	31.12.2025	31.12.2024	change
Share of Stage 3 and POCI non-performing in the gross portfolio	2.7%	3.2%	(0.5 p.p.)
Provision coverage of Stage 3 and POCI non-performing exposures	56.1%	55.9%	+0.3 p.p.

Table 60. Quality of the loan portfolio measured at amortised cost

PLN'000	31.12.2025			31.12.2024		
	total gross	NPL*	% share	total gross	NPL*	% share
Corporate Customers, excluding farmers	40,807,638	1,428,061	3.5%	36,190,293	1,479,716	4.1%
Farmers	7,296,966	268,375	3.7%	7,769,080	405,438	5.2%
Retail Customers	34,428,276	655,764	1.9%	32,858,093	715,413	2.2%
- mortgage loans	21,335,075	256,086	1.2%	20,207,062	288,465	1.4%
PLN	21,062,351	157,108	0.7%	19,779,708	172,862	0.9%
foreign currency	272,724	98,978	36.3%	427,354	115,603	27.1%
- cash loans	8,604,762	297,580	3.5%	8,487,233	320,712	3.8%
- other retail loans	4,488,439	102,098	2.3%	4,163,798	106,236	2.6%
Lease receivables	96,632	7,867	8.1%	151,860	24,894	16.4%
Public sector institutions	218,025	-	-	67,960	-	-
Non-bank financial entities	6,122,520	3,089	0.1%	6,484,263	9,275	0.1%
Gross loans and advances	88,970,057	2,363,156	2.7%	83,521,549	2,634,736	3.2%

* NPL defined as loans and advances in Stage 3 and POCI non-performing according to the information presented in Note 21 to the Separate Financial Statements

The value of collateral held for Customer loans as at 31 December 2025 amounted to PLN 1,592,896 thousand (PLN 1,792,387 thousand as at 31 December 2024). Details of collateral held are presented in Note 55.2. of the Separate Financial Statements for the year ended 31 December 2025.

Liabilities and equity

As at 31 December 2025, the Bank's total liabilities stood at PLN 158,839,504 thousand, up by PLN 11,063,912 thousand i.e. 7.5% year on year. The share of liabilities in the Bank's total liabilities and equity was 90.1% as at 31 December 2025 (-0.5 p.p. year on year).

Table 61. Liabilities and equity

PLN'000	31.12.2025	31.12.2024	change	
			PLN'000	%
Amounts due to the Central Bank	-	-	-	-
Amounts due to other banks	5,923,407	5,757,872	165,535	2.9%
Derivative financial instruments	2,276,575	2,311,741	(35,166)	(1.5%)
Differences from hedge accounting	320,087	260,025	60,062	23.1%
Amounts due to Customers	141,355,067	130,830,128	10,524,939	8.0%
Liabilities under issued debt securities (including subordinated issuances)	4,226,368	-	4,226,368	-
Subordinated liabilities	-	3,420,128	(3,420,128)	(100.0%)
Leasing liabilities	553,267	606,204	(52,937)	(8.7%)
Other liabilities	1,977,881	2,262,300	(284,419)	(12.6%)
Current tax liabilities	172,523	358,468	(185,945)	(51.9%)
Provisions	2,034,329	1,968,726	65,603	3.3%
Total liabilities	158,839,504	147,775,592	11,063,912	7.5%
Share capital	147,880	147,800	80	0.1%
Supplementary capital	9,110,976	9,110,976	0	0.0%
Other reserve capital	4,648,934	4,024,205	624,729	15.5%
AT1 Capital bonds	650,000	650,000	-	0.0%
Revaluation reserve	(184,001)	(541,084)	357,083	(66.0%)
Retained earnings	3,096,841	1,920,012	1,176,829	61.3%
- retained profit	84,646	(400,786)	485,432	(121.1%)
- net profit for the period	3,012,195	2,320,798	691,397	29.8%
Total equity	17,470,630	15,311,909	2,158,721	14.1%
Total liabilities and equity	176,310,134	163,087,501	13,222,633	8.1%



Equity as at 31 December 2025 stood at PLN 17,470,630 thousand, up by PLN 2,158,721 thousand i.e. 14.1% year on year. The share of equity in the Bank’s total liabilities and equity was 9.9% as at 31 December 2025 (9.4% as at 31 December 2024).

Amounts due to Customers

As at 31 December 2025, amounts due to Customers stood at PLN 141,355,067 thousand, up by PLN 10,524,939 thousand i.e. 8.0% year on year.

Table 62. Amounts due to Customers by product

	31.12.2025		31.12.2024	
	PLN'000	% share	PLN'000	% share
Current accounts	94,309,802	66.7%	86,336,306	66.0%
Term deposits	45,326,169	32.1%	43,070,184	32.9%
Loans and advances received	450,612	0.3%	449,955	0.3%
Other liabilities	1,268,484	0.9%	973,683	0.7%
Amounts due to Customers, including:	141,355,067	100.0%	130,830,128	100.0%
deposits	140,904,455	99.7%	130,380,173	99.7%

Equity

Equity of the Bank stood at PLN 17,470,630 thousand as at 31 December 2025, up by PLN 2,158,721 thousand i.e. 14.1% year on year. In accordance with Resolution No. 7 of the Annual General Meeting of BNP Paribas Bank Polska S.A. dated 15 April 2025, the Bank distributed the net profit earned in 2024, amounting to PLN 2,320,798 thousand, as follows: PLN 1,162,341 thousand was paid out as a dividend, PLN 658,457 thousand was allocated to the reserve capital, and the remaining amount remained in retained earnings.

The Bank’s equity changed also owing to earnings of the period (net profit of 2025 at PLN 3,012,195 thousand, up by PLN 691,397 thousand i.e. 29.8% year on year).

Own funds and capital ratios

The Bank’s total capital ratio as at 31 December 2025 stood at 17.00% (down by 0.58 p.p. year on year). The separate Common Equity Tier 1 ratio (CET 1) as at 31 December 2025 was 13.06% (down by 0.32 p.p. year on year) and the separate Tier 1 ratio of the Bank as at 31 December 2025 was 13.70% (down by 0.40 p.p. year on year).

The decrease in the capital ratios was mainly driven by CRR3 which took effect as of 1 January 2025, as well as an increase in total credit risk weighted assets (mainly corporate exposures and mortgage-backed exposures) and total operational risk weighted assets.

As at 31 December 2025, total own funds increased by PLN 1,490,091 thousand year on year and total risk exposure amount was PLN 11,867,235 thousand.

Table 63. Own funds and capital ratios of the Bank

PLN'000	31.12.2025	31.12.2024	change y/y	
			PLN'000	%
Common Equity Tier 1 (CET 1)				
- share capital	147,880	147,800	81	0.1%
- supplementary capital	7,259,316	7,259,316	-	0.0%
- reserve capital	5,823,440	5,198,711	624,729	12.0%
- general banking risk fund	627,154	627,154	-	0.0%
- intangible assets	(498,279)	(545,689)	47,410	(8.7%)
- other components of own funds, included in the calculation of CET 1	17,681	(570,403)	588,083	(103.1%)
Total CET 1	13,377,192	12,116,889	1,260,302	10.4%
Additional Tier 1 capital	650,000	650,000	(0)	(0.0%)
Total Tier 1 capital	14,027,192	12,766,889	1,260,302	9.9%
Supplementary funds (Tier II)				
- subordinated liabilities included in own funds	3,379,809	3,150,021	229,788	7.3%
Total own funds	17,407,001	15,916,910	1,490,091	9.4%
Risk exposure amount due to				
- credit risk	88,771,493	78,742,649	10,028,844	12.7%
- market risks	1,202,181	1,338,766	(136,584)	(10.2%)
- operational risks	12,377,475	10,422,548	1,954,927	18.8%
- credit valuation adjustments	70,160	50,112	20,048	40.0%
Total risk exposure amount	102,421,309	90,554,074	11,867,235	13.1%



Capital ratios of the Bank	31.12.2025	31.12.2024	change
Common Equity Tier 1 (CET 1)	13.06%	13.38%	(0.32 p.p.)
Tier 1	13.70%	14.10%	(0.40 p.p.)
Total Capital Ratio (TCR)	17.00%	17.58%	(0.58 p.p.)

The minimum levels of capital adequacy ratios on a separate basis under external regulations and administrative decisions issued by the Polish Financial Supervision Authority are as follows:

Minimum levels of the Bank’s capital ratios	31.12.2025	31.12.2024	change
Common Equity Tier 1 (CET 1)	8.25%	7.50%	0.75 p.p.
Tier 1	9.75%	9.00%	0.75 p.p.
Total Capital Ratio (TCR)	11.75%	11.00%	0.75 p.p.

As at 31 December 2025, all capital adequacy ratios of the Bank were higher than the minimum requirements by:

- 4.81 p.p. for the Common Equity Tier 1 ratio,
- 3.95 p.p. for the Tier 1 ratio,
- 5.25 p.p. for the Total Capital Ratio.

Minimum level of own funds and eligible liabilities (MREL)

On 20 June 2023, the Bank received a letter from the BGF regarding the joint decision of the resolution authorities, i.e. the Single Resolution Board (“SRB”) and the BGF on the minimum level of own funds and eligible liabilities (“MREL”). The joint decision indicates that the Group’s restructuring plan envisages a Single Point of Entry (SPE) strategy for mandatory restructuring. The Bank’s preferred tool for mandatory restructuring is the open bank bail-in tool.

The MREL requirement for the Bank was set on the separate basis at 16.11% of the total risk exposure amount (“TREA”) and 5.91% of the total exposure measure (“TEM”). This requirement was binding from 31 December 2023.

On 8 May 2025, the Bank received an updated letter from the BFG regarding the MREL requirement. The MREL requirement for the Bank was set on the separate basis at 15.93% of the total risk exposure amount (“TREA”) and 5.91% of the total exposure measure (“TEM”). This requirement is binding from 8 May 2025.

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 BFG Act, which transposes Article 45f(2) BRRD. According to the BGF’s expectations, the part of MREL corresponding to the recapitalisation amount (“RCA”) will be met in the form of AT1, T2 instruments and other subordinated eligible liabilities acquired directly or indirectly by the parent company. The Bank meets the requirement.

At the same time, the BFG indicated that Common Equity Tier 1 (“CET1”) instruments held by the Bank for the purposes of the combined buffer requirement cannot be counted towards the MREL requirement expressed as a percentage of TREA. This rule does not apply to the MREL requirement expressed as a TEM percentage.

Changes to the funding structure

In 2025, the Bank adjusted the structure of its Tier 2 instruments by replacing partially amortised subordinated loans with issuances of 15-year capital bonds. These transactions resulted in a slight increase in Tier 2 capital (by PLN 78,265 thousand year on year), while significantly improving the maturity structure of Tier 2 instruments.

On 18 August 2025, the Bank notified BNP Paribas S.A. (the lender) of its decision to exercise the early repayment option for subordinated loans classified as Tier 2 capital amounting to EUR 40 million obtained under the agreement dated 10 December 2018, CHF 60 million obtained under the agreement dated 15 November 2012 (as amended on 20 November 2017), and EUR 60 million obtained under the agreement dated 15 November 2012 (as amended on 20 November 2017). These loans were repaid in September 2025, following prior approval from the Polish Financial Supervision Authority.

On 7 November 2025 and 2 December 2025, the Bank notified BNP Paribas S.A. (the lender) of its decision to exercise the early repayment option for subordinated loans classified as Tier 2 capital amounting to CHF 90 million obtained under the agreement dated 12 September 2014 (as amended on 13 September 2019), and PLN 2,300 million obtained under the agreement dated 7 December 2020. These loans were repaid in November and December 2025, respectively, following prior approval from the Polish Financial Supervision Authority.

The above instruments were replaced by series B capital bonds issued by the Bank on 6 June 2025 with a total nominal value of EUR 160 million and series C capital bonds issued on 10 October 2025 with a total nominal value of EUR 630 million.

On 17 December 2025, the Bank notified the European Bank for Reconstruction and Development of its decision to exercise the early repayment option for a PLN 450 million loan obtained under the agreement dated 7 December 2021. Repayment of the loan together with accrued interest was scheduled for 19 January 2026.

On 1 December 2025, the Bank concluded an agreement with BNP Paribas S.A. for the issuance of series D Senior Non-Preferred capital bonds in the amount of EUR 200 million.

These instruments were recognised for the purpose of meeting the MREL requirements in relation to TREA and TEM

The Bank meets the MREL requirements as at 31 December 2025.



MREL requirement	requirement as at 31.12.2025	requirement as at 31.12.2025 including CBR	31.12.2025	31.12.2024
TREA	15.93%	19.68%	21.73%	22.83%
TEM	5.91%	5.91%	11.34%	11.61%

Financial ratios

The Bank's return on equity (ROE), calculated based on reported figures, stood at 18.6% as at 31 December 2025 and was up by 1.8 p.p. year on year. Return on assets (ROA), calculated based on reported figures, was 1.8%, up 0.3 p.p. year on year. The improvement in the return ratios was mainly due to the increase in net banking income, effective cost controlling and reduction, lower negative impact of the legal risk of foreign currency mortgage loans, and lower credit risk cost.

The cost/income ratio, calculated based on reported figures, was 40.6% (down 2.1 p.p. year on year). This change was due to income growing faster than costs despite higher regulatory charges (BFG).

The net interest margin calculated in relation to average assets over the year was 3.5% (down by 0.1 p.p. year on year). The decrease in the margin was due to gradual interest rate cuts in 2025.

The low cost of credit risk, as reported and as adjusted (net of the sale of the loan portfolio), reflects the balanced approach to risk management and a very good quality of the Bank's loan portfolio.

The level and evolution of ratios which measure net and gross loans to deposits and sources of funding reflect the good liquidity position observed in 2025 and 2024.

Table 64. Financial ratios

	31.12.2025	31.12.2024	31.12.2023	change 2025/2024
Return on capital ⁽¹⁾	18.6%	16.7%	8.2%	+1.8 p.p.
Return on assets ⁽²⁾	1.8%	1.5%	0.7%	+0.3 p.p.
Net interest margin ⁽³⁾	3.5%	3.6%	3.5%	(0.1 p.p.)
Costs/income ⁽⁴⁾	40.6%	42.7%	41.7%	(2.1 p.p.)
Costs/income without BFG, IPS and credit holidays	38.2%	40.5%	40.3%	(2.3 p.p.)
Credit risk costs ⁽⁵⁾	(0.18%)	(0.27%)	(0.03%)	+0.09 p.p.
Credit risk costs without impact of sale of loans ⁽⁶⁾	(0.21%)	(0.34%)	(0.06%)	+0.13 p.p.

	31.12.2025	31.12.2024	31.12.2023	change 2025/2024
Net loans/deposits ⁽⁷⁾	61.8%	62.6%	64.6%	(0.8 p.p.)

(1) Net profit to average equity calculated on an end-of-quarter basis.
(2) Net profit to average assets calculated on a quarter-end basis.
(3) Net interest income to average assets calculated on a quarter-end basis. Net interest income annualised taking into account the actual number of days.
(4) General administrative expenses and depreciation and amortisation to net banking income, calculated as the sum of net interest income, net fee and commission income, dividend income, net trading income, result on investing activities, result on hedge accounting and other operating income and expenses.
(5) Result on impairment losses on financial assets and provisions for contingent liabilities to average gross loans and advances to Customers, measured at amortised cost, calculated on a quarter-end basis. Result of impairment losses annualised taking into account the actual number of days.
(6) Calculation made net of 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) Loans and advances to Customers (net) to Customer deposits. Balance at the end of the period

Average interest rates used by the Bank

Table 65. Average interest rates at the Bank*

Product	PLN		EUR	
	2025	2024	2025	2024
Deposits (categories below)	1.91%	2.16%		
Households and non-commercial institutions	1.92%	2.09%		
Non-financial entities	1.90%	2.24%		
Loans (categories below)	7.66%	8.00%	3.34%	4.84%
Households and non-commercial institutions	8.07%	8.24%	4.23%	5.40%
Non-financial entities	6.92%	7.52%	3.33%	4.83%

* based on the Bank's mandatory reporting to the NBP Statistics Department



Risks and opportunities

115 Risk management system

118 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 risk 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 organisational 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 defence, used to define roles and scopes of responsibility for effective supervision and organisation 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 organisational 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 defence.

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, defines risk appetite, adopts risk management policies, and sets limits for significant types of risk and risk control procedures. The principles of risk management originate from the BNP Paribas Bank Polska S.A. Risk Management Strategy defined by the Bank’s Management Board and approved by the Supervisory Board.

The organisation of the risk management system in the Bank primarily takes into account the role of the Supervisory Board, the Management Board, dedicated committees (Audit Committee and Risk Committee of the Supervisory Board, Asset and Liability Management Committee (ALCO), Risk Management Committee, Retail Banking Risk Committee, 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.

Internal capital adequacy assessment

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 objective of maintaining 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 aimed at:

- protecting the Bank from risk materialisation,
- ensuring 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 significance assessment,
- preparing a report from the conducted assessment.

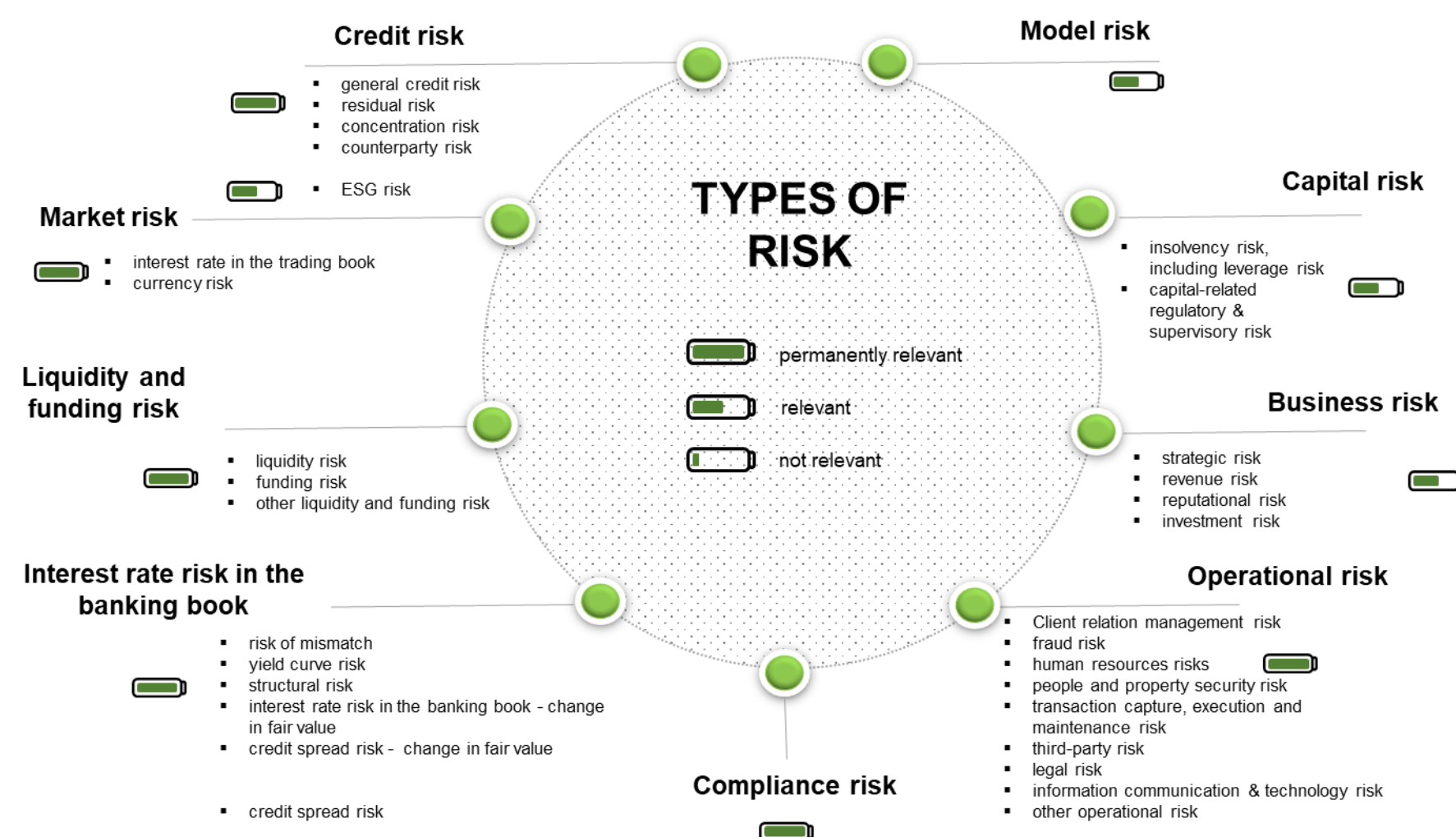
The process of assessing the significance of risks is carried out annually in the Bank.

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 materialisation 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 2025, the structure of identified risks is as follows:



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 on a separate and consolidated basis. The reports are presented at the Risk Management Committee meeting on a monthly basis and to the Bank's Management Board and Supervisory Board on a quarterly basis.

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.

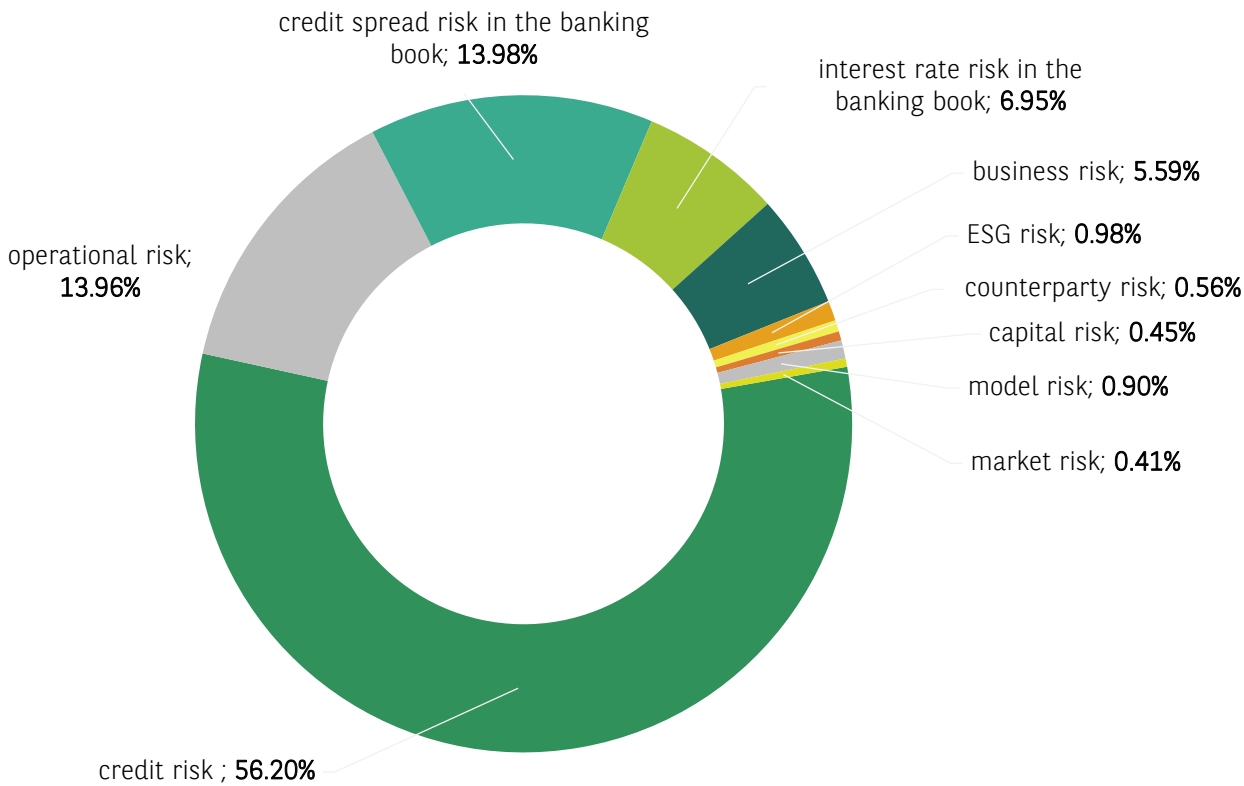
In order to measure risk, the Bank uses two approaches: quantitative and qualitative. The use of a particular approach is related to the characteristics of the risk.

Risk measurement methods:

- quantitative methods - used when the Bank has information about the materialisation of risk and is able to measure a quantitative feature,
- qualitative methods - used when the Bank does not have information on the historical materialisation 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 hard to measure and conducts an assessment using a qualitative method, presenting qualitative characteristics of risk materialisation.



Chart 18. Structure of internal capital in the BNP Paribas Bank Polska S.A. Group as at 31 December 2025



Risk appetite

For identified significant risks, the Bank defines 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 as to:

- ensure that 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 Programme 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,
- business model stress tests,
- internal capital stress tests,
- reverse stress tests,
- climate 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 programme 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 programme fulfils the requirements of EBA/GL/2018/04 Guidelines of 19 July 2018 on stress testing.

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 fulfil 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 is defined 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 set out 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 organisationally adapted to the business line structure adopted in the Bank. A key role in the credit risk management system is played by the organisationally 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 Committee.

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 lending term. At all competence levels, credit decisions are made by two persons (the "four eyes" principle) by a representative of the business line and a representative of the organisational 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 the Retail Banking & Personal Finance Risk Committee, credit decisions can be made unilaterally by representatives of business lines.

In credit risk management, the Bank is guided by the following principles:

- each credit transaction requires a comprehensive assessment of credit risk, the result of which is an internal rating or scoring,

- 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 collateral; 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 the Customer are monitored in a manner transparent to the Customer and strengthening relations with the Customer.

Credit risk management in the Bank's subsidiaries

The principles of the Bank's oversight of credit risk generated by the subsidiaries are defined in the Credit Policy of BNP Paribas Bank Polska S.A.

The Bank recommends, reviews, and accepts the policies, principles, and methodologies used by the subsidiaries 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 SME Banking Customers,
- risk classification system according to the IFRS standards,
- assessment of the creditworthiness of the Bank's and subsidiaries' shared 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 Annual Report for the 12-month period ended 31 December 2025.



In 2025, as part of adjusting the level of provisions to expectations regarding the future macroeconomic situation, the level of provisions increased by PLN 5,679 thousand due to updating the forecasts of macroeconomic variables included in the IFRS 9 model used. In Q2 2025, due to significant market uncertainty, the Group decided not to include the impact of changes to macroeconomic factor projections in the Bank's profit, thus maintaining a more conservative approach to provision estimations.

In 2025, the Group made the following significant changes to the IFRS 9 model:

- change in EAD amortisation granularity in the ECL calculation formula. Following the modification, ECL for Stage 1 and Stage 2 portfolios is calculated on a quarterly rather than annual basis and then aggregated to the appropriate horizon, taking into account the discounting effect. The change resulted in a reduction of impairment charges by PLN 46,226 thousand,
- update of the PD model for a portfolio of businesses carrying full books of account, resulting in release of PLN 18,889 thousand provisions. The change calibrated the model estimating the impact of macroeconomic factors on credit loss by incorporating observations from June 2023 to June 2024. The adjustment ensured a better modelling of dependence and eliminated the unrealised conservatism of previous projections.

In 2025, the Group verified its Post Model Adjustments (PMA) in 2025. As a result of the review, additional allowances for sensitive customers using credit holidays were released. In particular, this was due to the stable quality of the portfolio after the credit holiday scheme was terminated. The adjustment on estimated and planned changes to the LGD model was reversed as the changes were reflected directly in the LGD model.

As a result of an analysis of the corporate loan portfolio, allowances for specific risks of selected sectors were reviewed.

Following these measures, PMA went down by PLN 88,679 thousand in 2025 and reached PLN 143,352 thousand as at 31 December 2025. Detailed information on the PMA (Post Model Adjustment) verification carried out in 2025 is presented in Note 3a Impairment of financial assets of the Consolidated Annual Report for the 12-month period ended 31 December 2025 (in the section "Description of methods used for determining expected credit loss allowances").

In 2025, as part of adjusting the level of impairment allowances to expectations regarding the future macroeconomic situation, the level of allowances increased by PLN 5,679 thousand. This resulted from the update of macroeconomic factor forecasts incorporated into the IFRS 9 model, performed in the first quarter of 2025. In the following quarters, due to high market uncertainty, the Group decided not to reflect the impact of changes in macroeconomic projections in the Group's results, thereby maintaining more conservative assumptions for estimating allowances. It should also be noted that the Group is working on changes to the model for incorporating macroeconomic forecasts into the ECL scenario weights, which – according to the Group's expectations – should partially neutralise the unrecognised reversals resulting from changes in macroeconomic forecasts.

Debt restructuring and debt enforcement

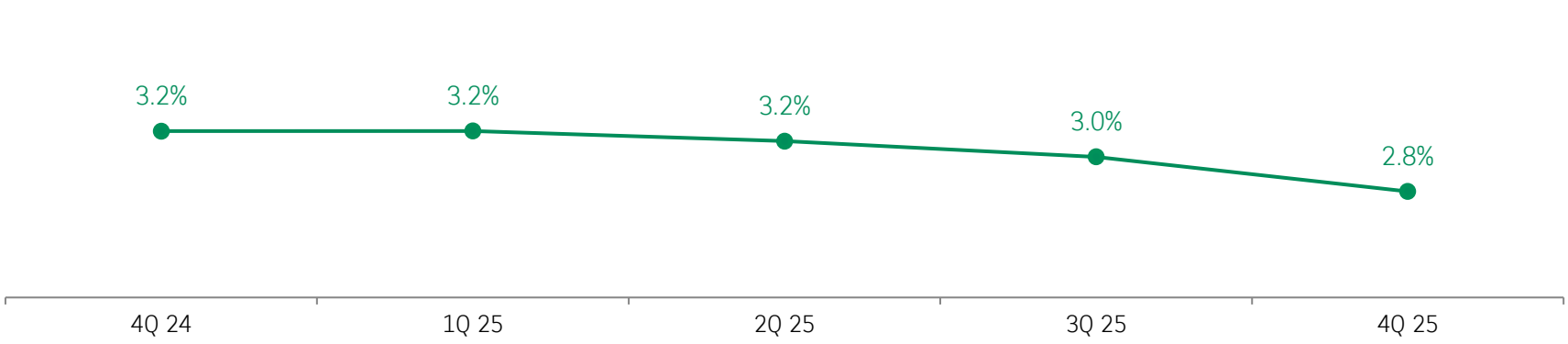
In 2025, a total of PLN 1,690.8 million in receivables were collected, of which:

- PLN 527.0 million - as a result of portfolio restructuring (corporate Customers PLN 377.0 million, SMEs PLN 134.5 million, retail Customers PLN 4.7 million, micro-enterprises PLN 8.9 million, mortgages PLN 2.0 million),
- PLN 1,083.4 million - as a result of debt enforcement (retail Customers PLN 539.7 million, micro-enterprises PLN 293.9 million, corporate Customers PLN 58.3 million, SMEs PLN 43.8 million, Personal Finance PLN 2.5 million),
- PLN 80.4 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 (NPL - defined as Stage 3 and POCI non-performing loans as presented in the note to the Consolidated Financial Statements at 31 December 2025) stood at 2.8%. Maintaining the ratio at a low level was possible thanks to the high efficiency of actions at the various stages of processing 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 debt enforcement.

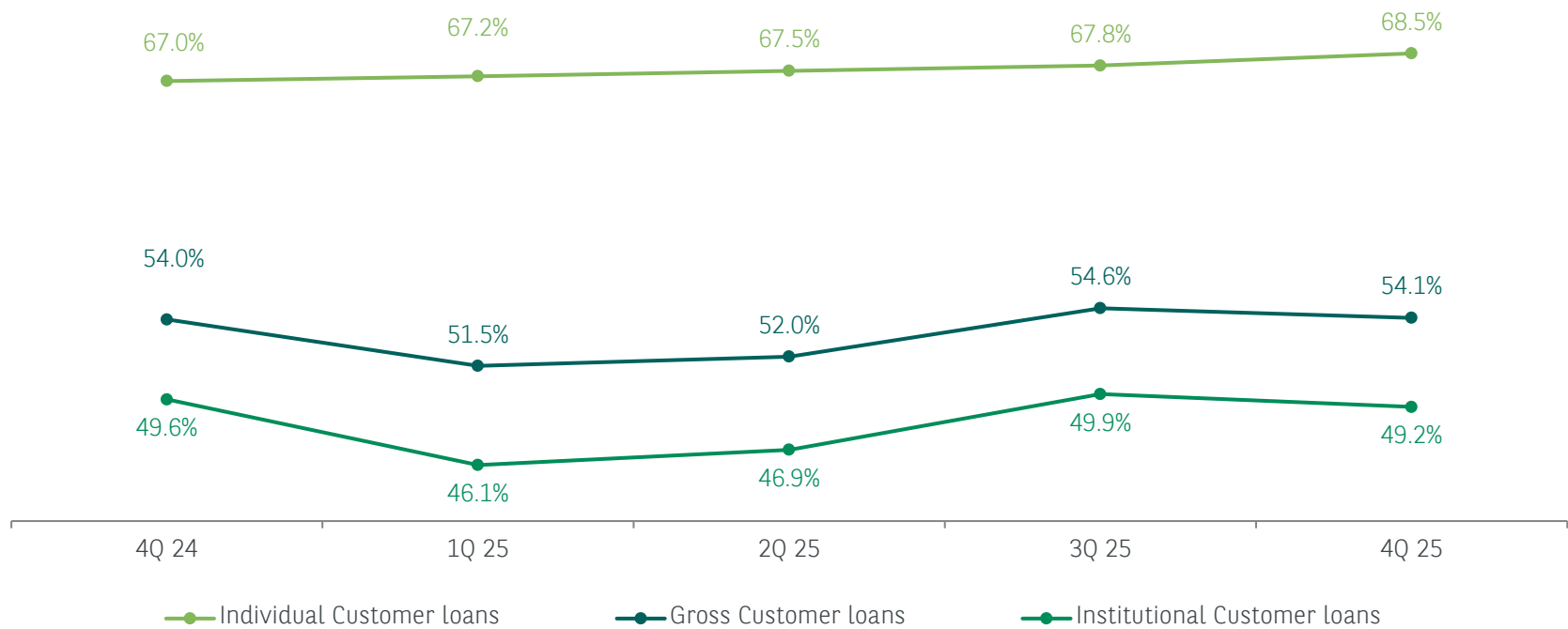
Chart 19. NPL ratio



As at 31 December 2025, the coverage rate for Stage 3 and POCI non-performing loans and advances was 54.1%, a slight increase of 0.1 p.p. compared to the coverage level observed at the end of 2024.



Chart 20. NPL provision coverage



Detailed information on the quality of the portfolio is presented in the financial performance section, loan portfolio.

The Group actively monitors the structure of the loan portfolio, including in particular the industry structure. Details are described under 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 2025, the limits on a consolidated and separate basis as defined in Article 395 of Regulation EU No. 575/2013 were not exceeded in relation to entities of the BNP Paribas S.A. Group and amounted to 11.20% of Tier 1 capital on a consolidated basis.

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 19.88% of Tier 1 capital on a consolidated basis.

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 collateral,
- geographic regions,
- average probability of default (PD),
- exposures with a specific rating (the Bank’s internal rating scale),
- exposures with a specific debt-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 statements,
- changing the business strategy in such a way as to counteract excessive concentration,
- diversification in terms of the types of accepted collateral.

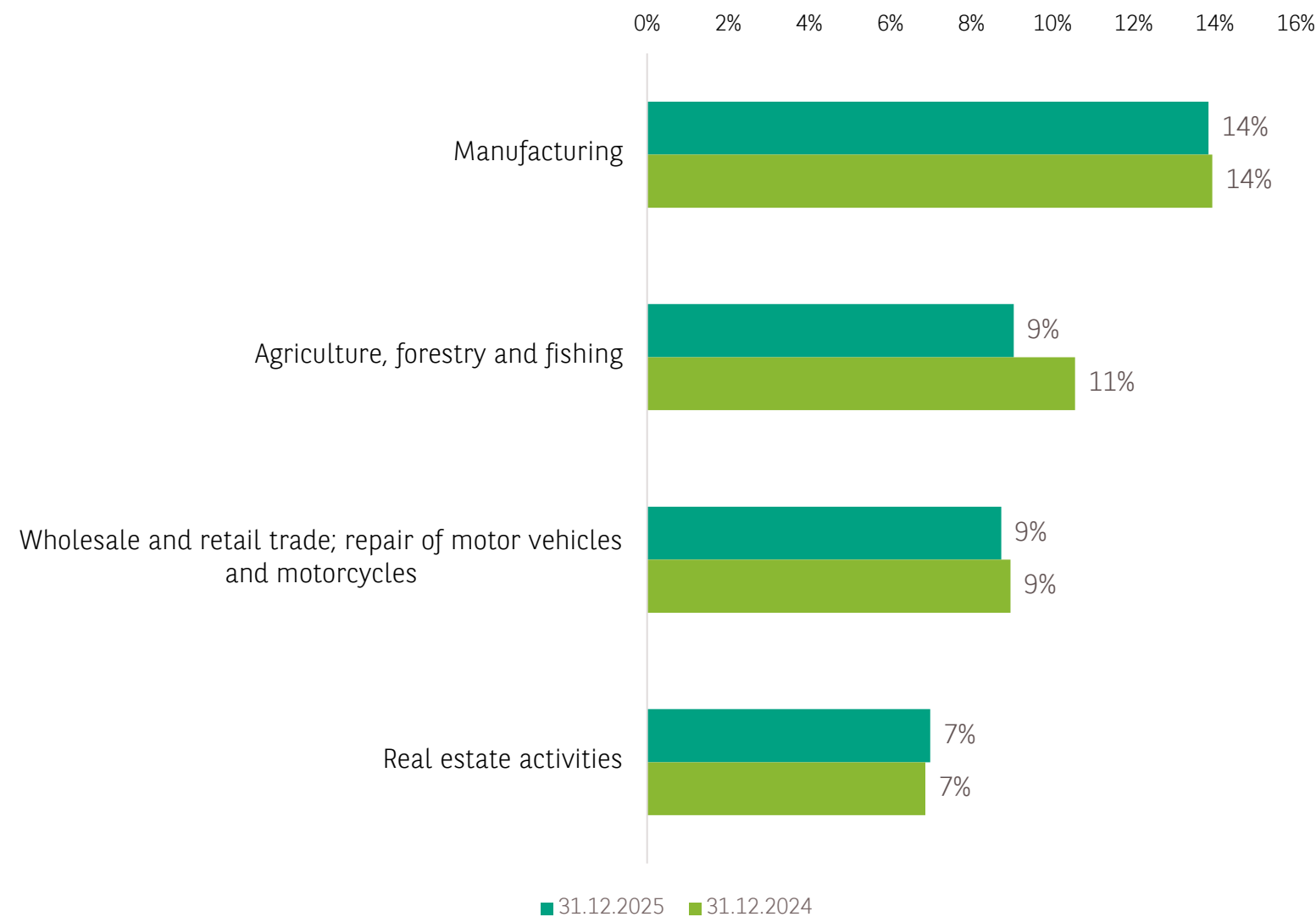
The Bank defines actions limiting single / specific decisions and transactions as follows:

- limiting further transactions with a given Customer or group of related Customers,
- sale of selected assets / credit portfolios,
- securitisation 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%)

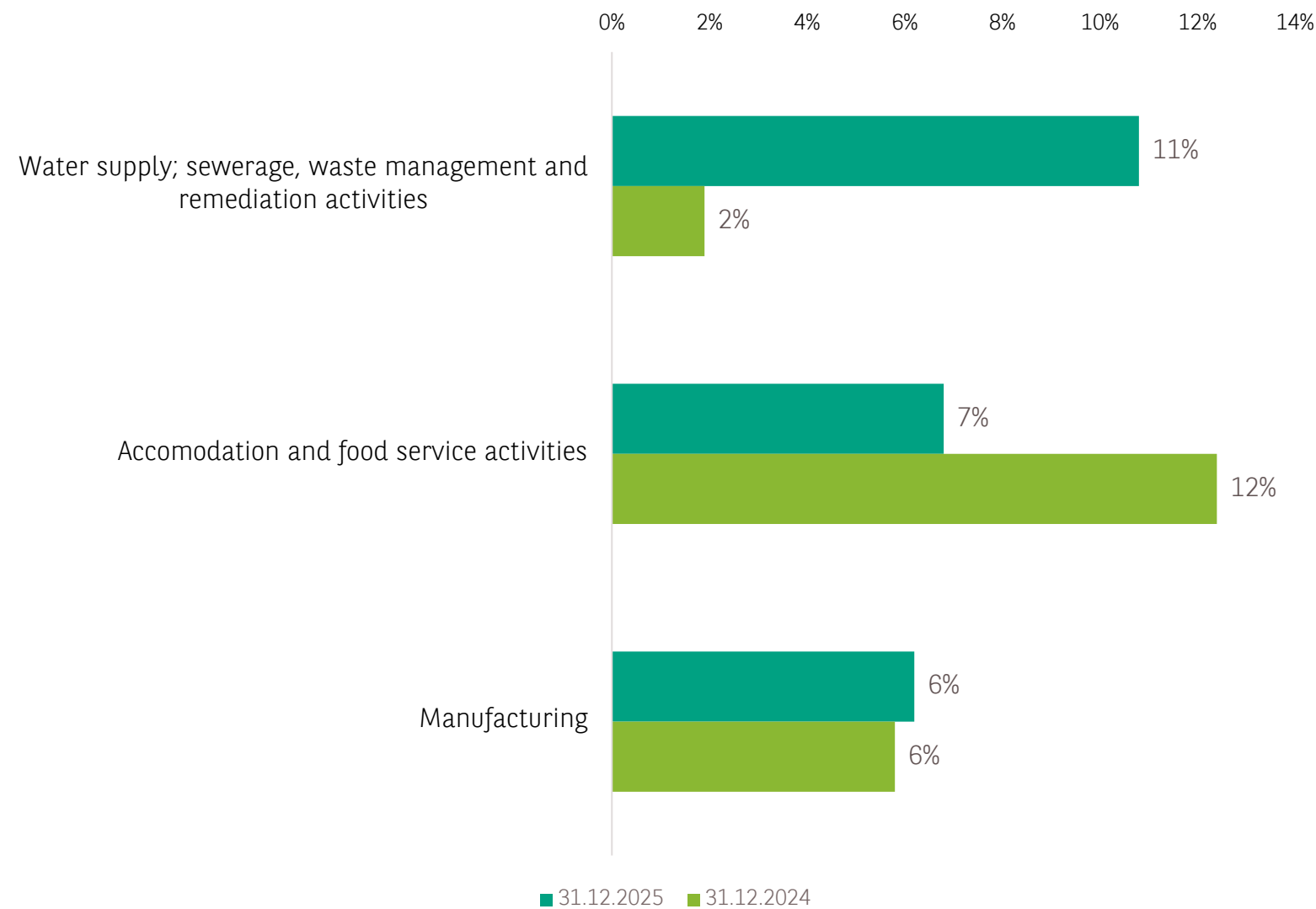


"Industrial Processing" has the highest share, where the share of risk loans is 6%. The industry with the highest share of risk loans is "Accommodation and catering services", which constitutes only 1% of the balance sheet exposure to institutional Customers.

More detailed information about the industry exposures can be found in note 54 of the Consolidated Annual Report for the 12-month period ended 31 December 2025.

In connection with the ongoing war in Ukraine and economic sanctions imposed on Russia and Belarus, the Bank has analysed credit exposures directly related to these countries and on this basis has not identified significant exposures in the institutional Customers and retail Customers portfolios.

Chart 22. Share of loans with recognized impairment (over 5%) in the portfolio of a given industry





Counterparty risk

Counterparty risk is the credit risk of a counterparty to financial market transactions, where the amount of the 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 Customer’s solvency and is crucial for the Customer’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 Customer, and settlement dates.

As at 31 December 2025, 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 the same as in granting credit products. This means that these transactions are covered in the credit process 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 governed 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.

ESG risk

ESG risk management

The risk identification and assessment principles developed by the Bank in 2021 defined a separate group of risk factors related to environmental, social and governance factors. Since then, the Bank has been continuously improving the process of identifying and managing ESG risk. In 2025, the risk identification process confirmed the material impact of ESG factors on credit, business, operational and liquidity risk. Because ESG factors are not yet comprehensively incorporated into the quantitative measurement of credit risk, a decision was made to classify ESG risk as a hard-to-measure risk category until ESG factors are fully reflected in credit parameters. As a result, in 2021 the Bank integrated ESG risk into its internal risk management framework by including ESG risk as a subtype of credit risk in the Risk Management Strategy and the Risk Appetite. To support the mitigation and control of this risk, the Bank developed principles for measuring ESG risk within the Internal Capital Adequacy Assessment Process (ICAAP). The capital plan was supplemented with limits for ESG risk, determined on the basis of the completed risk assessment. In 2021, the Bank developed the ESG Risk Management Principles, which include provisions on risk monitoring, reporting and stress testing. These principles are subject to at least annual updates.

Factors considered in ESG risk analysis

Environment:

- greenhouse gas emissions,
- energy consumption and efficiency,
- water, air and soil pollution,
- effective water-use management (risk of freshwater scarcity),
- soil degradation,
- deforestation,
- consumption of natural resources,
- waste management,
- biodiversity and ecosystem protection,
- risk of insufficient energy transition,
- development of low-emission and other environmental technologies (transition risk),
- regulatory constraints, 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, among other impacts, reduce asset values,
- changes in consumer sentiment and preferences driven by increasing awareness of environmental risks,
- risk of financial liability for negative impacts of business activities (compensation, penalties).

Social:

- integration of different social groups,
- supporting social cohesion,
- respect for diversity,
- whistleblower protection,
- investment in human capital and communities,
- preventing discrimination of any kind,
- combating inequalities and promoting equal opportunities,
- a safe and healthy working environment,



- health and safety of Customers, local communities and the broader environment,
- protection of Customer privacy,
- training and development,
- violations of human rights (forced labour, child labour, modern slavery),
- violations of labour rights: freedom of association, right to strike, collective bargaining rights, ethical employment standards,
- risk of insufficient prevention of terrorism and cybercrime threats,
- infectious diseases (affecting humans or animals),
- risk of financial liability for negative impacts of business activities (compensation, penalties).

Governance:

- unethical and unfair business practices,
- non-compliance with corporate governance standards (code of ethics, complaint and whistleblowing mechanisms, information transparency),
- gender diversity in corporate bodies,
- internal audit,
- board independence,
- executive remuneration,
- fraud and corrupt practices,
- shareholder rights,
- stakeholder engagement,
- defective ESG risk control systems,
- supply chain requirements,
- compliance with non-financial sector regulations,
- risk of financial liability for negative impacts of business activities (compensation, penalties).

The Bank recognises that risks related to environmental protection, social policy and corporate governance may constitute material risks for enterprises and systemic risks for the economy. To manage these risks, the Bank monitors the work of supervisory authorities as well as legislative proposals concerning the financial sector.

ESG analysis in the credit process

In 2021, in response to the requirements of the EBA Guidelines EBA/GL/2020/06 of 29 May 2020 on loan origination and monitoring, the Bank developed ESG assessment questionnaires, which were implemented in the credit process for corporate, SME and micro-enterprise Customers. The purpose of the assessment is to identify any risks related to ESG factors that may affect the financial situation of Customers, as well as the impact of Customers’ business activities on ESG factors. The Bank continuously undertakes actions to improve its approach to assessing and managing ESG risk, in line with regulatory, scientific and methodological developments and with the increasing availability of reliable data. In 2025, in the micro-enterprise segment, the Bank replaced the questionnaire with an internal ESG risk measurement model.

The Bank also applies a comprehensive assessment of the level of advancement of sustainability practices among its Customers (ESG Assessment). The analysis is based on questionnaires aligned with EU sustainability regulations and focused on ESG factors material to each industry. Owing to the breadth of the topics analysed, the Bank:

- assesses the scale of Customers’ engagement in key areas of their social and environmental impact,
- determines whether Customers are aware of sustainability challenges and what commitments and actions they undertake,
- monitors progress in implementing ESG practices.

Until recently, the ESG Assessment process covered only Strategic Customers. Since 2024, the Bank has extended the analysis to lower segments of Corporate Customers.

The Bank also applies the Equator Principles (EP), which serve to identify, assess and manage risks associated with the financing of specific projects and their impact on the natural environment and society. The principles ensure minimum standards for project due diligence processes.

The Bank also adheres to:

- **the Ocean Protection Policy**, which sets financing criteria for activities considered environmentally risky and harmful to ocean biodiversity,
- **the Human Rights Policy**, which establishes ethical standards and ensures respect for human rights in all actions undertaken by the Bank.

Sectoral policies

The sectoral policies applied by the Bank identify nine sectors considered particularly sensitive due to ESG risk. These sectors include: coal-based energy, mining, oil and gas, nuclear, forestry – wood pulp, forestry – palm oil, tobacco, agro-food, and defence and security.



All entities operating in these sectors that wish to become Customers of the Bank or obtain financing are required to meet the criteria set out in the Bank’s sectoral policies. At the same time, the Bank has made a strategic decision to discontinue servicing the sectors most harmful from a sustainability perspective.

232

Customers in sensitive sectors covered by assessment under Sectoral Policies

131

Customers covered by ESG Assessment

539

ESG assessments

3

lines of defence underlying integrated ESG data management in the Bank’s overall corporate governance framework

More information on the Sectoral Policies can be found in the section [Actions and resources in relation to climate change policies \(E1-3\)](#) in the Sustainability Statement.

Table 66. Sectors covered by the Bank’s Sectoral Policies

Sector	Bank’s commitments
Coal-based energy	• The Bank will not enter into cooperation with any new Customer that derives more than 25% of its revenue from coal-based energy or coal-related activities. • The Bank will cooperate only with those coal-energy enterprises that have a strategy to exit coal by 2030, covering both the coal-fired power plants they own and those they operate. • The Bank will not provide financial products or services for new coal-energy projects, regardless of their location, nor for the modernisation of existing coal-fired power plants or combined heat-and-power plants where the purpose is to extend their operational life or increase production capacity.

Mining	• The Bank will not provide any financial products or services to infrastructure companies that are significantly involved in the thermal-coal industry. • The Bank will not provide any financial products or services to entities belonging to mining groups that produce more than 10 million tonnes of thermal coal per year or derive more than 20% of their revenue from thermal coal. • The Bank will not provide any financial products or services for mining projects related to the extraction of thermal coal or metallurgical coal.
Oil and gas	• The Bank will not finance the development of new oil and natural-gas fields. • 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 supplied with unconventional LNG. • The Bank does not finance any oil-and-gas projects or infrastructure related to such projects in the Arctic and Amazon regions, or in the Esmeraldas province in Ecuador.
Nuclear	• As a financial institution, the Bank may offer its products and financial services to government entities that support enterprises developing non-military nuclear energy. The Bank believes that for countries planning to develop nuclear power or build new nuclear plants, as well as for the international community, it is essential not only to comply with safety and population protection requirements, but also to act with future generations and environmental protection in mind. • Through the application of its Sectoral Policy, the Bank aims to ensure that any projects it might finance are aligned with the principles of monitoring and mitigating the social and environmental impacts of the nuclear energy sector.
Forestry – wood pulp	• The Bank has observed that, due to the pulp production process, the activities of the heavy industry sector have a significant impact on the environment, including water, soil and air pollution, as well as on the health and safety of pulp-mill workers and surrounding communities. • The Bank aims to support responsible producers that apply sustainable development practices in the wood pulp sector.
Forestry – palm oil	• The Bank refrains from financing or investing in companies whose activities actively contribute to deforestation or that violate the rights of local communities. • The Bank aims to support responsible producers that apply sustainable development practices in the palm oil sector.



Tobacco	• The Bank is phasing out the financing of tobacco product manufacturers as well as growers and wholesalers whose core business is related to tobacco.
Agro-food sector	• The Bank provides a wide range of financial products and services for the agro-food sector across the entire value chain. The Bank’s partners are distinguished by a high level of responsibility, reflected in their commitment to providing people with healthy and safe products in a way that does not jeopardise food supplies for future generations. • Since 2021, the Bank has applied new criteria for companies involved in activities related to soy and beef in the Brazilian Amazon and Cerrado regions. The Bank will offer financial products or services only to companies that have adopted a zero-deforestation strategy in their production and supply chains no later than 2025. • In the case of the Amazon, the Bank will not finance Customers producing or purchasing beef or soy from areas deforested or converted after 2008; in the case of the Cerrado, from areas cleared or converted after 1 January 2020, in line with global standards. • For all Customers, the Bank will require full traceability of beef and soy supply chains (both direct and indirect) by 2025. • The Bank encourages Customers to transition to cage-free infrastructure systems for broilers and laying hens by 2025 and to implement the Responsible Minimum Standards of the FARMS Initiative, encouraging all poultry-farming companies (broilers and laying hens) to comply with 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, organisationally 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 (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 (gap risk),
- differences in the base rates that form the basis for determining the interest rate on positions with the same revaluation term (base risk),
- changes in market interest rates, which affect the fair value of the Bank’s open positions (interest rate variation risk).

Interest rate risk in the trading book has been classified as significant, and 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 favourable 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. Interest rate risk in the trading book: Value at Risk with a 99% confidence level in a one-day time horizon		
IR VaR (PLN’000)	2025	2024
Average	2,210	2,672
Maximum	3,679	4,266
Minimum	1,553	1,655

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 gains on short-term arbitration 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 favourable pricing conditions.

Foreign exchange risk has been classified as significant, and 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 currency rates, including in particular potential losses.

Table 68. Foreign exchange risk: Value at Risk with a 99% confidence level in a one-day time horizon

FX VaR (PLN'000)	2025	2024
Average	273	315
Maximum	1,693	1,600
Minimum	25	21

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 behavioural behaviours and embedded options using models e.g., for current accounts, savings accounts, fixed-rate loans, credit cards.

Modelling product behaviour 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):

- maturity gap in assets and liabilities ("gapping") for the banking book,
- outlier test of net interest income sensitivity (SOT NII) in accordance with regulatory guidelines,

- outlier test of 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 investments and non-interest bearing current accounts (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 as 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 book, using significantly larger changes in interest rates than those usually observed (stress tests).

The table below presents the interest rate gap for the banking book as at 31 December 2025. 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'000	up to 1 month	1-3 months	3-12 months	1-5 years	over 5 years	total
Cash and balances at Central Bank	10,224,866	-	-	-	-	10,224,866
Amounts due from banks	11,503,131	-	21,000	-	-	11,524,131
Loans granted to Customers	29,866,518	30,610,710	13,604,923	14,184,347	1,697,123	89,963,621
Investment securities	2,295,000	2,758,540	4,022,134	30,890,999	20,795,741	60,762,414
Other assets	1,375,821	115,977	300,227	1,609,139	750,435	4,151,599
Total assets	55,265,336	33,485,227	17,948,284	46,684,485	23,243,299	176,626,631
Amounts due to banks	(5,776,742)	(3,936,995)	(126,653)	(291,822)	(500)	(10,132,712)
Amounts due to Customers	(50,929,637)	(24,027,571)	(24,726,078)	(27,216,481)	(14,019,654)	(140,919,421)
Other borrowings	(4,184,433)	(650,000)	-	-	-	(4,834,433)
Capital	92,057	(357,526)	(4,334,217)	(8,580,629)	(4,290,314)	(17,470,629)
Other liabilities	(4,896,603)	(4,667)	(12,964)	(21,968)	(782)	(4,936,984)
Total liabilities	(65,695,358)	(28,976,759)	(29,199,912)	(36,110,900)	(18,311,250)	(178,294,179)
Net off-balance-sheet liabilities	1,821,830	(3,149,021)	3,649,356	-1,758,185	(363,380)	200,600
Interest rate gap	(8,608,192)	1,359,447	(7,602,272)	8,815,400	4,568,669	(1,466,948)

The average period of capital investments and non-interest-bearing current accounts as at 31 December 2025 was 4.7 years.

The sensitivity of net interest income to 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 non-stable part of the deposit base and assumptions made about changes in the balance sheet structure.

Table 70 shows the sensitivity of net interest income as at 31 December 2025 to 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 PLN. In the sensitivity analysis of net interest income, 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 net 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 (O/N/1M) financial transactions. The impact of maturity gaps between assets and liabilities on the sensitivity of net interest income is low.

The increase in the sensitivity of net interest income at the end of 2025 is mainly due to an increase in non-interest-bearing account balances.

Table 70. Net interest income sensitivity as at 31 December 2025.

Change in interest rates (PLN million)	+100 bps	-100 bps
For PLN	236	(243)
For all currencies combined	349	(356)

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 Commission Delegated Regulation EU 2024/856 (the non-stable part of deposits negatively affects the measure). The value of the measure as at 31 December 2025 was 4.68% of Tier 1 capital which is below the applicable regulatory limit of 5% of Tier 1 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 Tier 1 capital. As at 31 December 2025, the maximum SOT EVE was -6.35%.

As at 31 December 2025, 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 swaps (IRS): 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.
- 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. The hedging instruments are standard interest rate swaps (IRS): plain vanilla IRS in EUR and USD, under which the Bank pays a fixed interest rate and receives a variable rate based on EURIBOR 3M, EUR ESTR and USD SOFR.
- cash-flow hedge - the hedged risk is interest rate risk, in particular the lack of variability of interest flows on the hedged security, caused by changes in a certain reference rate. The hedged items are variable-coupon bonds WZ1131 and WZ0330. The hedging instruments are standard interest rate swaps (IRS): plain vanilla IRS in PLN, under which the Bank receives a fixed interest rate and pays a variable rate based on WIBOR 6M.

The war in Ukraine has essentially not affected the way interest rate risk is managed in the banking book.

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:

- finance assets and meet 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,
- obtain 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 and other potential liabilities associated with, among others, settlement of derivative transactions or collateral established by the Bank,
- generate positive net cash flows 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 positive net cash flows over a certain time horizon.

The Bank’s policy 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 range of services provided and initiating changes in the core 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 position. This applies in particular to events that may cause reputational 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. Actions 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 credit lines and capital. Medium- and long-term credit lines, taking into account subordinated loans and funds obtained in the process of issuing the Bank’s debt, 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 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 placed by Customers in current and term deposits, striving to maintain a stable relationship between these positions and funds placed on the accounts of non-bank financial institutions, as shown in the table below:

Table 71. Structure of the Group’s loan portfolio financing

PLN million	31.12.2025	31.12.2024
Net loans	91,174	85,854
Total sources of funding	155,710	144,340
Customer deposits, including:	141,339	130,925
- Retail Customers	59,183	55,184
- Corporate Customers	71,765	66,970
- Non-bank financial institutions	6,622	5,434
- Public sector institutions	3,769	3,336
Amounts due to banks *	10,145	13,415
Debt securities issued	4,226	-

**including subordinated liabilities*

In 2025, the Group made changes to the structure of Tier 2 supplementary capital by replacing partially amortised subordinated loans with issuances of 15-year capital bonds.

On 6 June 2025, the Bank issued series B capital bonds with a total nominal value of EUR 160 million; on 10 October 2025, series C capital bonds with a total nominal value of EUR 630 million; and on 1 December 2025, series D Senior Non-Preferred bonds in the amount of EUR 200 million. These issuances replaced the repaid subordinated loans of: EUR 40 million (from 10 December 2018), CHF 60 million (from 15 November 2012, amended on 20 November 2017), EUR 60 million (from 15 November 2012, amended on 20 November 2017), CHF 90 million (from 12 September 2014, amended on 13 September 2019), and PLN 2,300 million (from 7 December 2020).

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 medium and long-term loans from the BNP Paribas Group, which provides stable funding to cover shortfalls in EUR, USD, CHF. At the end of 2025, the CHF mortgage portfolio, in the part not covered by the provisions made, was financed with Customer deposits in CHF.

As at 31 December 2025, the structure of long-term credit lines activated within the Group was as follows:

Table 72. Structure of loans from the BNP Paribas Group in original currency

PLN million	31.12.2025	31.12.2024
CHF	0	150
EUR	2,496	1,591
PLN	4,079	6,336

Table 73. Structure of loans from the EBRD, EIB and CEB

PLN million	31.12.2025	31.12.2024
PLN	400	1,003
EUR	25	10

The net liquidity coverage ratio (LCR) for the Group was 292.8% at the end of 2025, an increase of 45.6 p.p. compared with the end of 2024 (247.21%). LCR measures were maintained at similar levels during the year.

The Net Stable Funding Ratio (NSFR) stood at 169.63% as at 31 December 2025 for the Bank and 167.01% for the Group, an increase of 7.53 p.p. and 7.26 p.p. year on year, respectively.

The ongoing war in Ukraine did not affect the Bank’s overall liquidity situation. Gradual NBP interest rate cuts in 2025 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 2025.

Operational risk

The Bank defines operational risk, in accordance with the requirements of the Polish Financial Supervision Authority included in Recommendation M and the requirements of CRR3, as risk caused by inappropriate or failed internal processes, people, systems or external factors, which includes among others legal risk, model risk and ICT risk but not but strategic risk or reputational risk.

The Bank identifies operational risk as permanently significant.

Operational risk is inherent in all kinds of banking activity; the Bank also recognizes the consequences of materializing of compliance risk as operational risk events and losses.

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, the Bank’s 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 strategic assumptions for operational risk 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 to and addressing identified events that could cause such consequences. Achieving the above priority includes promoting an appropriate operational risk management culture within the Bank. The objectives of the Strategy, which the Bank implemented in 2025, included compliance with laws and regulations, monitoring and mitigating legal risk, ICT risk, risk of fraud including cybercrime, mitigating the materialisation of risks in the Bank's operations, 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 operational risk appetite measures defined in the Operational Risk Management Strategy.

The Operational Risk Management Strategy covers 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 by dedicated units/persons appointed for this purpose. The means 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 organisational 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 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 organisation

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 organisational levels of the Bank.

The Bank precisely defines the division of responsibilities for operational risk management, which is adapted to its organisational structure. The operational risk management process is carried out within three lines of defence. The first line of defence is the management of risk in the Bank's operational activity. The second line of defence are Risk Area units responsible for managing risks, including risk measurement, monitoring, controlling and reporting, independently of the first line of defence, the Second Line of Defence Office of the Finance Area, the Legal Division, the Custody Services Department Supervision Officer, the Regulations and Supervision Team in the Brokerage Office, and Compliance Monitoring. The third line of defence is the Internal Audit Division.

As part of the second line of defence, comprehensive supervision over the organisation 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, including ICT risk, combating fraud 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. Business continuity management, including issues related to business continuity plans ensuring continuous and undisturbed operation of the Bank and contingency 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 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 compliance risk and the development and improvement of adequate control techniques.

Other significant areas of operational risk management include:

- HR risk management,
- outsourcing risk management,
- 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 organisational 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 organisation 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 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:

TOOLS USED	MAIN PURPOSE OF TOOL USE
OPERATIONAL RISK EVENT REGISTRATION	• Effective analysis and monitoring of operational risk • Responding to identified vulnerabilities to operational risk
SELF-ASSESSMENT OF OPERATIONAL RISK AND CONTROL (RCSA)	• Building awareness about operational risk • Identification of operational risk, determination of threats and identification of their sources, 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

TOOLS USED	MAIN PURPOSE OF TOOL USE
OPERATIONAL RISK SCENARIO ANALYSIS (SA)	• 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)	• 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	• 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 defence of the correctness of risk identification and limitation by the first line of defence units • Recommending actions to reduce risk
OPERATIONAL RISK IDENTIFICATION FOR CONTRACTS WITH EXTERNAL SUPPLIERS (OUTSOURCING)	• 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	• 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 • 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 access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms and amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC, as amended (CRD IV) and the standards required by the institutions supervising the Bank’s activities.



The operational risk profile is understood as the identification of the main areas in which the Bank is exposed to adverse operational events, as well as the indication of the most significant potential operational events that may (or do) result in negative consequences for the Bank, i.e. financial and non-financial losses. 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 organisational structure and the effectiveness of the risk management system and internal control system functioning in the Bank.

The Bank, in accordance with the requirements of CRR3, determines regulatory capital to cover operational risk based on the new standardised approach for operational risk.

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 are 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, organisational framework, and standards for the functioning of the Bank’s control environment, in 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 organisational 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 three lines of defence 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 2025, the Bank undertook and continued a number of actions limiting operational risk and strengthening the control mechanisms and processes over this type of risk. The Bank focused on geopolitical, regulatory and operational factors impacting the operational risk profile and on cybersecurity threats which remain an important risk of rising importance. In particular, processes and tools for countering and combating fraud to the Bank’s detriment were strengthened, including, among others, combating credit fraud and phishing. The Bank continued a program to reduce the risk of internal fraud. 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. In connection with the ongoing war in Ukraine, the Bank continuously monitored potential threats to the Bank, including security and business continuity threats.

The effectiveness of the solutions implemented by the Bank is periodically reported, in particular, to the Bank’s Management Board and the Risk Committee at the Supervisory Board.

External environment, including geopolitical risk

In the area of operational risk management, the Bank continuously analyses risks related to the consequences of the war in Ukraine, as well as the growing geopolitical tensions in the Middle East. These events may lead to increased cybercriminal activity, physical attacks, and disruptions to global supply chains and critical infrastructure, including payment and banking infrastructure. The Bank undertakes appropriate measures to ensure the safety of both its employees and Customers, as well as to maintain business continuity and the uninterrupted execution of processes related to its operations.

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 organisational 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 defence:

- first line of defence includes all organisational 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 defence consists of managing compliance risk by independent organisational units appointed for this purpose - the Compliance Monitoring Division responsible for implementing the compliance risk management process and other organisational units of the Bank responsible for ensuring compliance in their areas of competence (e.g., risk monitoring units, legal function, and supervision officers for brokerage and custody activities),
- third line of defence 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 it.

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 Monitoring 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 function

The Bank has a separate, independent compliance function: the Compliance Monitoring Division. The activity of this unit aims to implement the process of managing compliance risk, i.e., introducing solutions that allow for the identification, assessment, control and monitoring of compliance 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 investigations, developing 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 adherence by the Bank’s first line of defence of the internal control system, with particular emphasis on the following areas:

- anti-money laundering and counter-terrorist financing,
- compliance with international embargoes and sanctions,
- protection of Customer interests,
- professional ethics and anti-corruption,
- conduct on financial markets,
- counteracting market manipulations and the use of inside 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 function and to enable it to perform its tasks.

As part of the Bank’s organisational 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 function, and necessary rules are in place to protect the employees of this function from unjustified termination of employment.

Key measures to mitigate compliance risk

To ensure compliance with regulatory requirements and to strengthen the Bank’s internal control system, a number of significant actions were carried out in 2025, contributing to the mitigation of the risk of non-compliance with applicable regulations and supervisory recommendations.

As part of the implementation of recommendations issued by the Polish Financial Supervision Authority (UKNF), the customer risk assessment matrix was updated to reflect new regulatory guidelines. The review period for customers

assessed as standard-risk was shortened to a maximum of five years. Detection scenarios for money laundering risks were also modified by lowering value thresholds that trigger alerts in selected customer groups and scenarios, enabling earlier identification of potential threats. A new customer data update process was introduced, based on verification of information in official public registers, which increased data reliability and improved the quality of customer assessments.

In response to evolving geopolitical conditions, in 2025 the Bank blocked the execution of transfers to and from Russia and Belarus. This decision reflected the growing exposure to various risks associated with cooperation with these countries.

The Bank continued its systematic educational campaign aimed at employees, designed to strengthen awareness of ethical standards, including anti-corruption measures and the protection of inside information.

Control mechanisms were also reinforced in particularly sensitive areas, including oversight of reference rate quotation, the flow of inside information, and the management of conflicts of interest. In particular, additional control procedures were introduced in connection with employees’ personal transactions, which contributed to greater transparency and compliance with ethical principles.



Sustainability Statement

135	General Disclosures (ESRS 2)
160	Climate change (ESRS E1)
177	Taxonomy disclosures
181	Own workforce (ESRS S1)
201	Consumers and end-users (ESRS S4)
212	Business conduct (ESRS G1)
219	Additional information on the entity
225	Appendix 1
228	Appendix 2



Introduction

This 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 (EU) 2022/2464 of the European Parliament and of the Council 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 statement 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 the sustainability statement (BP-1)

The BNP Paribas Bank Polska S.A. Capital Group prepares its sustainability statement on a consolidated basis.

Information presented in the Sustainability Statement relates to the period from 1 January 2025 to 31 December 2025, unless otherwise specified in the Sustainability Statement. The 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 companies of the BNP Paribas Bank Polska S.A. Capital Group as at 31 December 2024 including:

- 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 Statements of the BNP Paribas Bank Polska S.A. Capital Group for the year ended 31 December 2025.

No subsidiary of the Bank exceeds the thresholds set out in 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 \(SBM-1\)](#).

In the preparation of this Statement, we used the option of omitting certain information related to intellectual property, know-how, and innovation. We are not disclosing sensitive information which is key to our business strategy and development plans in order to protect our competitive position. The foregoing is without prejudice to the general materiality of the disclosures.

Governance

The role of the administrative, management and supervisory bodies (GOV-1, GOV-2)

Sustainability governance structure

As of 2022, the Bank has a Sustainability Area, with the Chief Sustainability Officer (CSO) as its Executive Director. The CSO acts as the main coordinator for sustainability 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 Sustainability 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 business strategy, hence a number of organisational units in the Bank and its subsidiaries are involved in its implementation. Since January 2026, Sustainability Area has been merged with Food & Agro; the new Sustainability & Agrobusiness Area is headed by the new Executive Director and Chief Sustainability Officer (CSO).

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 units within the scope of their responsibilities.

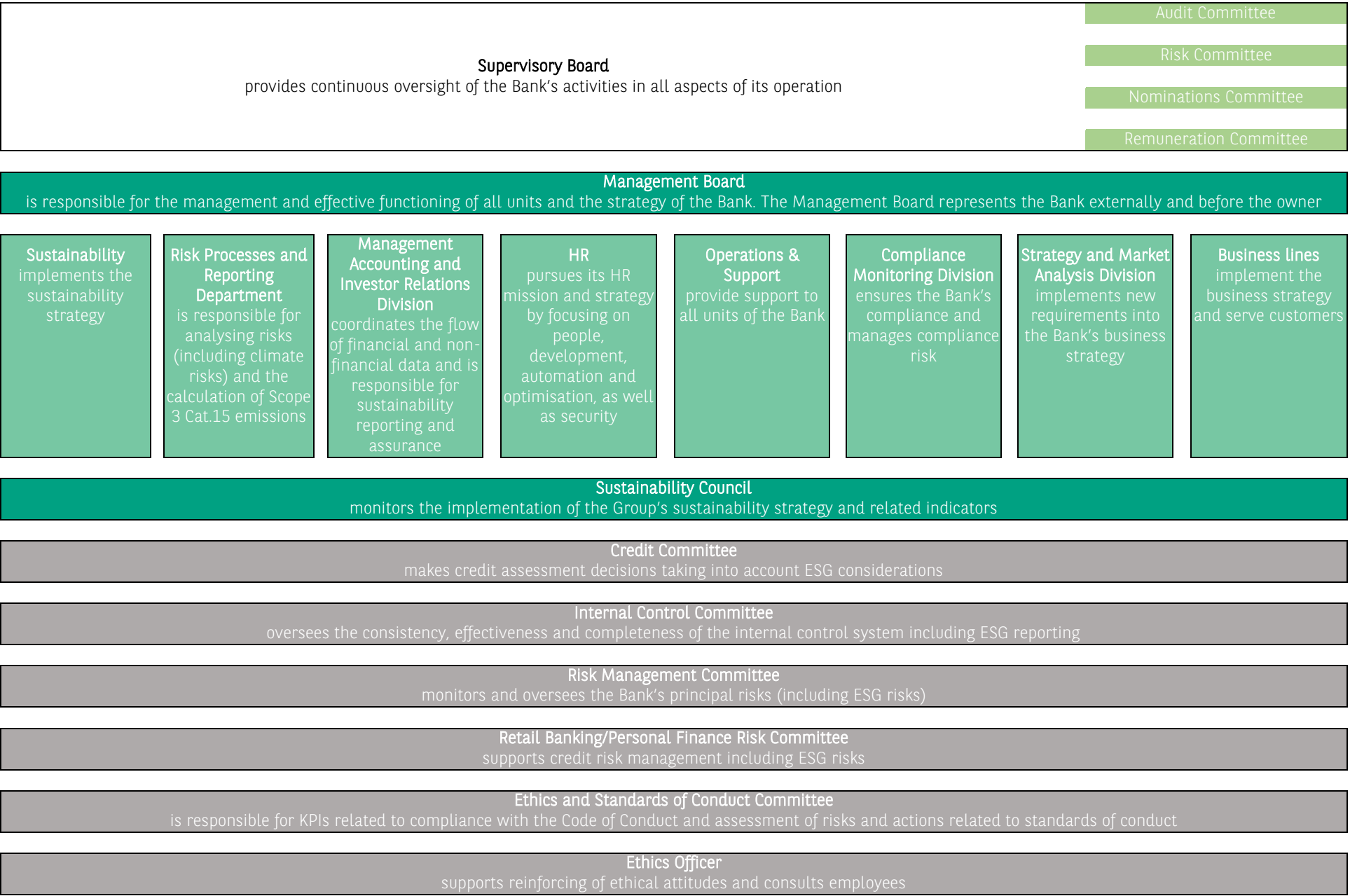


A number of the Bank’s collegiate bodies, including the Credit Committee, the Internal Control Committee, the Risk Management Committee, the Retail Banking/Personal Finance Risk Committee, the Ethics and Standards of Conduct Committee, report on specific sustainability issues (including risks and negative impacts). 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, and to discuss 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 managing body of BNP Paribas Bank Polska. There are Supervisory Board committees with decision-making powers on specific aspects considered to be related to, among others, sustainable development, as described in the further part of this chapter.

The Bank has the competence to carry out double materiality assessment, which have been mapped in the preparation of this year’s disclosures. The Target Operating Model defines units and persons responsible at the Bank for impacts, risks and opportunities (IRO) identified in the materiality assessment and described in detail under [Description of the process to identify and assess material impacts, risks and opportunities \(IRO-1\)](#).

Group’s sustainability governance structure in 2025





Management and supervisory bodies and sustainability information provided to them

Management Board

The Management Board is the 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 of the entire organisation, and acts in an interest of the Group and its stakeholders, especially the shareholders and investors. It defines the directions of the operations of the Group. It ensures that they are executed by the top and lower level management, in line with its interest, considering environmental, social and governance factors.

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 under [Statutory bodies of the Bank](#) in the Management Board Report of the Group.

The organisation of the Bank's risk management system (described in more detail in the chapter [Risk and opportunities](#)) primarily takes into account the roles of the Bank's Management Board, Supervisory Board, dedicated committees (Audit Committee and Risk Committee of the Supervisory Board), Assets and Liabilities Committee (ALCO), Risk Management Committee, Retail Banking Risk Committee, Personal Finance Risk Committee, Credit Committee, Problem Assets Committee, TAC/NAC Committee, and 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 2025:

- the Management Board consists of eight Board Members;
- the percentage of women is 37.5% (three women and five men);
- 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 to all areas overseen by them.

On 21 October 2025, Andre Boulanger resigned as Vice-President, Head of CIB effective as of 31 December 2025. As of 1 January 2025, Natalie Yacoubian joined the Management Board of the Bank. On 2 January 2026, Agnieszka Wolska resigned as Vice-President, Head of SME and Corporate Banking. Following the changes on the Management Board, the percentage of women on the Management Board was 42.9% as at the date of this publication.

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 the topics discussed include sustainability impacts, risks and opportunities. The Management Board discussed sustainability approximately 40 times in 2025, addressing topics including:

- sustainability reporting status and plan and updated Double Materiality Assessment (DMA) process for 2025 based on the 2024 report benchmarks; the Management Board reviewed the process and methodology applied to conduct the DMA and

approved the results of the double materiality assessment, which defines the scope of annual sustainability reporting by key topics as required by the ESRS;

- selection of the audit firm to provide assurance of the Bank's and the Group's sustainability reporting for 2025,
- 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 and prudential transition plan;
- ESG risk;
- the Bank's strategy for ESG-related services;
- human resources, e.g. equality and inclusion, salaries;
- Customer's Voice: a report on complaint handling and priority actions to improve the NPS;
- corporate governance, e.g. key indicators for compliance with ethics and standards of conduct, whistleblowing policy.

Supervisory Board

The Supervisory Board exercises continuous oversight of the Bank's activities in all aspects of its operation. The Supervisory Board approved the Group's new strategy in December 2025 (which includes the sustainability strategy) for 2026-2030. The Supervisory Board o approves the strategic objectives and certain policies related to sustainability. 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 and monitors integration of risks including ESG risks. The Supervisory Board also monitors the work of the Management Board to the extent of its objectives.

The committees of the Supervisory Board (Audit Committee, Risk Committee, Remuneration Committee and Nominations Committee), consisting of members of the Supervisory Board, have a consultative and advisory function for the Supervisory Board and enhance its work.

Composition and diversity of the Supervisory Board as at 31 December 2025:

- The Supervisory Board consists of 12 persons;
- The percentage of women is 50% (six women and six men);
- Three nationalities were represented (Polish, French and Belgian);
- 50% of independent members in accordance with the independence criteria.

More information regarding the Supervisory Board is included in the chapter Corporate governance, section [Supervisory Board](#).

The **Audit Committee** supports the Supervisory Board with regard to, among others, monitoring the integrity of financial information and carrying out auditing activities involving non-financial information published by the Bank. The Audit



Committee is also responsible for ensuring the information flow and good cooperation between the external auditor (statutory auditor), internal audit and the Supervisory Board.

In 2024, the Audit Committee monitored the implementation of the CSRD at the Bank. In 2025, the Audit Committee reviewed the Sustainability Statement of the BNP Paribas Bank Polska S.A. for 2024 and the results of independent verification of ESG data. The Audit Committee was informed of the results of the double materiality assessment for 2025 disclosures and recommended that the Supervisory Board select Ernst & Young Audyt Polska Sp. z o.o. Sp.k. as the auditor to provide assurance of the Sustainability Statement for 2025.

During its meetings, the Audit Committee reviewed the execution of the complaint handling process, the NPS results and action plan, a report on compliance with the principles of ethics, a review of breaches of regulations, and a report on the Bank's compliance with the Best Practice for WSE Listed Companies 2021. The Audit Committee discussed the annual and semi-annual Management Board reports and the 2025 Sustainability Statement work plan.

The **Risk Committee** supports the Supervisory Board in overseeing the area of risk management. The Risk Committee issues opinions 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. The Risk Committee ensures appropriate risk identification, assessment and mitigation, including through integration of sustainability risks into the risk management framework.

In 2025, in its discussions of credit risk, the Risk Committee addressed the level of physical risk, transition risk, risk appetite and the results of ESG questionnaires that are filled out when providing financing to customers. In addition, the Risk Committee discussed ESG risks including information on regulatory risks and greenwashing risks. The Risk Committee reviewed reports on progress of the decarbonisation strategy and data collection for setting emission reduction targets. The Risk Committee reviewed a presentation comparing the Bank with other banks in this regard.

The **Remuneration Committee** and **Nominations Committee** support the Supervisory Board in its supervisory duties in the area of human resources management, as referred to in [Own workforce \(ESRS S1\)](#). The competences of the Remuneration Committee include, among others, analysing the performance of the members of the Management Board, its consistency with the strategic goals, ethical standards and regulatory requirements, and making suggestions to the Supervisory Board in this respect, as well as recommending key performance indicators to the Supervisory 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 2025, the Remuneration Committee discussed, among others, the adjusted and unadjusted pay gap of the Bank and the outcome of the resulting salary raises.

A description of the composition and tasks of the various committees of the Supervisory Board can be found in the chapter Corporate governance, 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 the 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 regularly updated and its current version is 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 Chairperson of the Supervisory Board has access. An important element of the implementation of the whistleblowing policy is the whistleblowing process governed by the Whistleblowing Policy at 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. Whistleblowing Officers are responsible for receiving reports at the Bank (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 experience 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 Board and Supervisory Board is presented in the chapter Corporate governance, section [Statutory bodies of the Bank](#).

The top management make every effort to broaden their 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. They regularly participate in sustainability conferences.

The Management Board and the Supervisory Board of the Bank are composed of persons with the necessary skills and competences 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, all members of the Management Board and the Supervisory Board have documented trainings in sustainability. The table below summarises training completed in 2025. Additional skills are included in the CVs of the members of the Management Board and the Supervisory Board presented in the chapter Corporate governance, section [Management Board](#) and [Supervisory Board](#).



Table 74. Training of members of the Supervisory Board and Management Board with sustainability content

Training completed in 2025 / Member of the body	Management Board								Supervisory Board of the Bank											
	Przemysław Gdański	Andre Boulanger	Małgorzata Dąbrowska	Wojciech Kembtowski	Piotr Konieczny	Magdalena Nowicka	Volodymyr Radin	Agnieszka Wolska	Lucyna Stańczak-Wuczyńska	Francois Benaroya	Jean-Charles Aranda	Małgorzata Chruściak	Sophie Heller	Monika Kaczorek	Bożena Leśniewska	Vincent Metz	Piotr Mietkowski	Khatleen Pauwels	Jacques Rinino	Mariusz Warych
Code of Conduct 2025	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓			✓	✓	✓		
Protecting customer interests	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓			✓	✓	✓		
Conflicts of interest	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓			✓	✓	✓		
Golden rules of cybersecurity 2025	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓
Financial security	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓					✓	✓	✓		
Market trends and outlook for Supervisory Board and Management Board members	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓		✓					✓	✓
Preventing bribery and corruption – Most exposed employees	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓			✓	✓	✓		
Cyberdefence Awareness	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓

Integration of sustainability-related performance in incentive schemes (GOV-3)

The Group aspires to ensure competitive, fair remuneration for all employees and managers. The remuneration principles for members of the Bank’s Supervisory Board and persons with a significant impact on the Bank’s risk profile, including members of the Bank’s Management Board, are described in the chapter Corporate governance, section [Remuneration of the Management Board and the Supervisory Board](#). Those rules are governed by the Remuneration Policy for Members of the Supervisory Board of BNP Paribas Bank Polska S.A. and the Remuneration Policy for persons with a significant impact 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 Supervisory 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 targets are reviewed by the Remuneration Committee and are approved by the Bank’s Supervisory Board and are then cascaded within the Bank’s structures.

Sustainability was one of the four key pillars of the strategy GObeyond for 2022-2025 (Pillar POSITIVE); sustainability objectives are therefore included in the targets of the Management 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 2025, the targets for the members of the Bank’s Management Board included the following sustainability targets:

- As part of the Bank’s strategic financial targets: new volume of sustainable financing in 2025 – 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), who was set a target related to active support and development of sustainability, processes and strategies.
- As part of strategic and non-financial targets representing between 40% (Management Board members) and 50% (CEO) of annual targets:
 - target regarding the Code of Conduct, completion of compliance training and implementation of audit recommendations,
 - target for employee engagement and eNPS (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),
 - targets related to identification and promotion of Green IT initiatives (for the Management Board member responsible for New Technologies and IT Security),
 - sustainable finance leadership targets: share of sustainable finance in the Group’s loan portfolio (for all Management Board members).

The Remuneration Policy for Members of the Supervisory Board and the Remuneration Policy for persons with a significant impact on the risk profile of BNP Paribas Bank Polska S.A. (including members of the Management Board of the Bank) are voted by the General Meeting.

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 Board or Management Board.

All the strategic objectives of the POSITIVE pillar were included in the Bank’s 2025 Sustainability Area Executive Director’s targets. In addition, 2025 sustainability targets were set for senior managers, all employees in the Sustainability Area units and persons 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 Sustainability Finance 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 and anti-corruption regulations. A description of the due diligence that the Group exercises in the context of sustainable development can be found in various sections of this statement. It covers both its own operations and its approach to the entire value chain.

The table below presents the key elements of due diligence for each section of the Sustainability Statement.

Key elements of due diligence	Section in the Sustainability Statement
Embed due diligence into 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), Policies related to consumers and end-users (S4-1)
Engage with affected stakeholders in all key steps of the due diligence process	Interests and views of stakeholders (SBM-2), Processes for engaging with own workforce and workers representatives about impacts (S1-2)
Identify and assess adverse impacts	Description of the process to identify and assess material impacts, risks and opportunities (IRO-1), Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)
Address these adverse impacts	Transition plan for climate change mitigation (E1-1), Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3), 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), Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3),



	Prevention and detection of corruption and bribery (G1-3)
Track the effectiveness of these efforts and communicate	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 material risks. Therefore, in response to the requirements of the EBA/GL/2020/06 Guidelines of 29 May 2020 on loan origination and monitoring, we developed ESG assessment questionnaires for all our 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, the Group:

- assesses the scale of Customers’ engagement in their key areas of social and environmental impact,
- determines whether Customers are aware of sustainability challenges and what commitments and actions they are taking,
- monitors progress in the implementation of ESG practices.

In 2025, the Bank carried out work to align with the EBA Guidelines EBA/GL/2025/01 on the management of environmental, social and governance risks. This included the implementation of questionnaires for collecting the data required by the guidelines for various categories of entities, which have been in use at the Bank since 2026.

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, section [Internal control system \(including control and risk management system for the preparation of financial reports\)](#).

The **internal control system for sustainability reporting**, aligned with the Group’s overall internal control framework, is based primarily on:

- defining the roles and responsibilities of individual units and persons responsible for specific parts of the Sustainability Statement, as set out in the Sustainability Statement Rules, which form part of the Policy on fulfilling disclosure obligations related to the listing of the Bank’s shares on the Warsaw Stock Exchange.

- establishing a dedicated internal control plan for the units involved in preparing the Sustainability Statement.
- approving individual sections of the Sustainability Statement by designated responsible persons.

The Investor Relations and ESG Reporting Office, which coordinates the preparation of the Sustainability Statement, constitutes the second line of defence in this process.

First line controls focus on ensuring:

- compliance of sustainability reporting with ESRS and national and EU regulations;
- quality of the reported sustainability data.

The risk management system related to the sustainability reporting process follows the same framework as the Group’s overall risk management system, described in the section [Managing impacts, risks and opportunities](#).

As part of its oversight of the sustainability reporting process, the Audit Committee reviewed matters related to sustainability statements, including the double materiality assessment, key performance indicators, and observations arising from the assurance process.

Strategy

Strategy, business model and value chain (SBM-1)

The Group’s diversified business model

The 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 our 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 credit 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 risk 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 transition** – 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-sized Enterprise Banking**– serves Agro and non-Agro Customers,

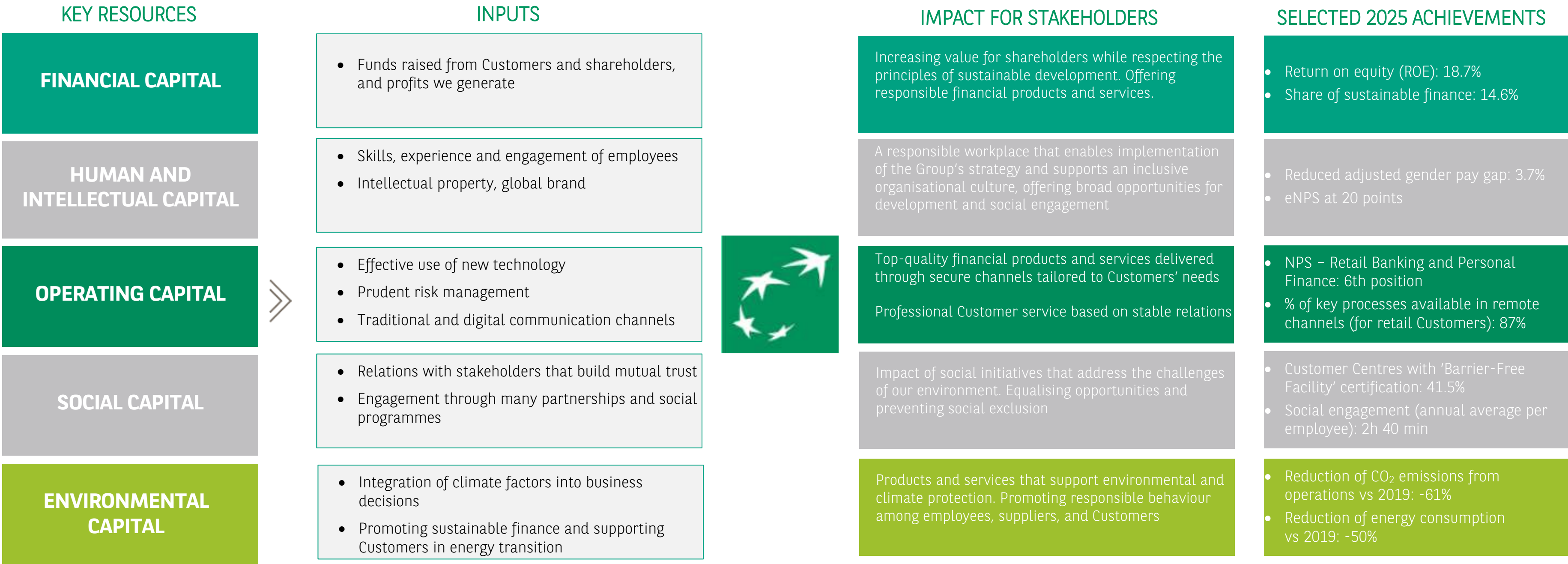
- **Corporate and Institutional Banking (CIB)** – supports the sale of the Group’s products to Polish companies and serves strategic Customers,
- **Other banking activities** include the Asset and Liability Management Division and the Corporate Centre.

Business model

How the Bank creates value

The Bank operates a business model aimed at value creation for all stakeholders in the changing world. The Bank pursues this objective through its business units.

The figure below presents the Group’s key intangible resources and explains how the Group’s business model depends on them. The key capitals built and consumed in the Group’s operations generate effects for the stakeholders, as measured with the key indicators set for the resources.





The Group uses its human, financial, and technical resources to create and distribute financial products and services, as presented in the table below.

Table 75. Presentation of core products and services of the Group’s business segments

Retail and Business Banking	Corporate and SME Banking	Corporate and Institutional Banking (CIB)
Deposits and savings (maintaining current accounts and deposit accounts, accepting term deposits)	Deposits (current accounts, term deposits), cash management	Managing cash flows and liquidity, optimising working capital
Distributing banking services (daily banking, payments, currency exchange, debit and credit cards)	Distributing financial solutions (overdraft, revolving loans, investment loans, leases, factoring, arranging bond issues)	Financing services (financing current business, financing M&As and investment projects)
Distributing financial solutions (house loans, cash loans, consumer loans, overdraft, micro-business loans)	Financial market products (currency exchange and derivative transactions for Customers)	Transactions in currency and money markets (including derivatives), sale of financial market products hedging currency risk, interest rate risk and commodity price risk
Distributing insurance and investment products (brokerage, investment advisory, distributing investment fund shares)	Global trade finance (full service for import and export LCs, bank guarantees, documentary collection)	Advisory on M&As and restructuring, advisory and arranging capital market transactions
	Specialised services: real estate finance, structured finance for mid-caps, investment banking, services for local governments and agro-business	

Value chain

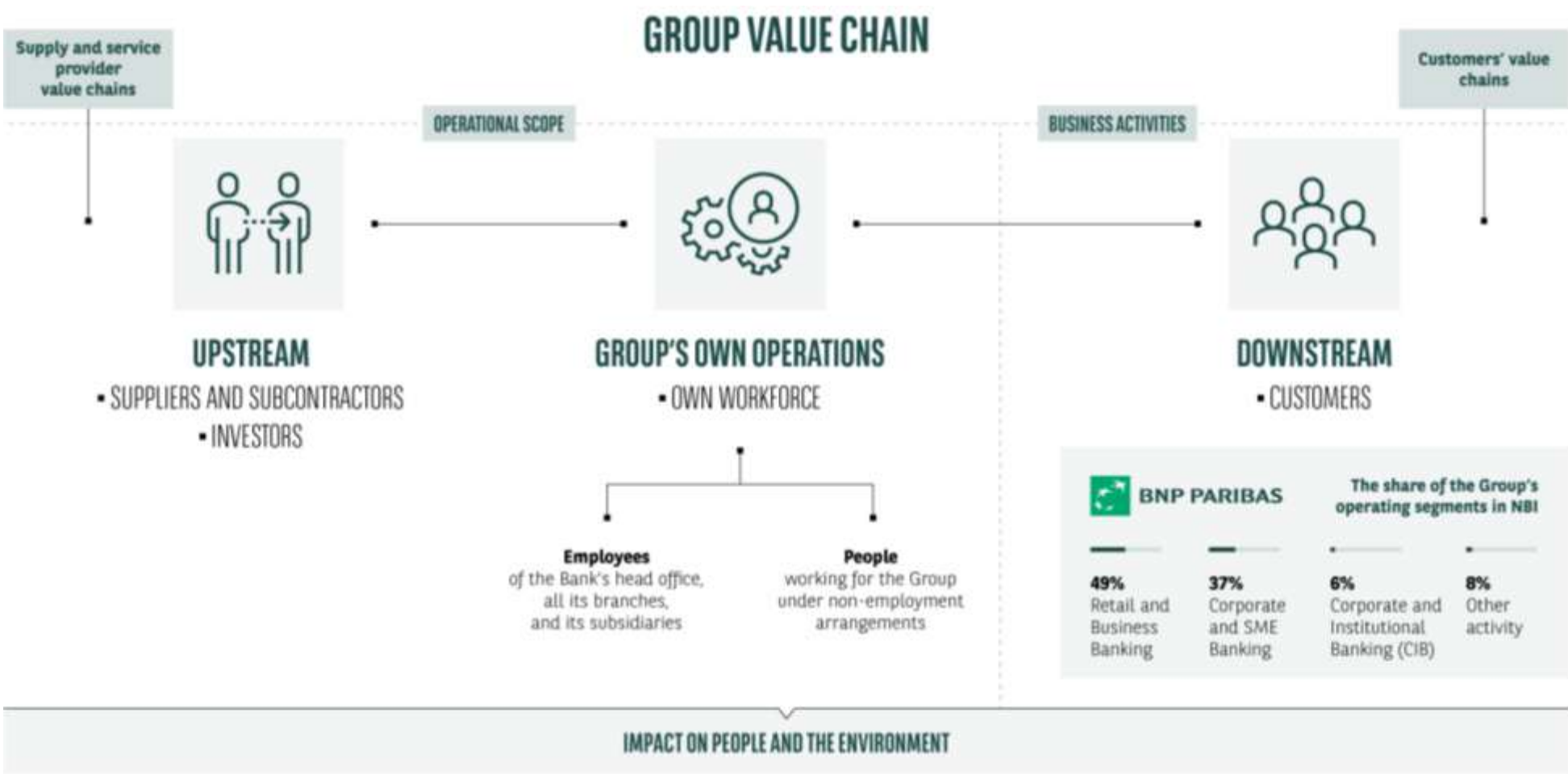
The Group’s products and services are distributed in the downstream part of the value chain by specific business segments (e.g., retail banking), forming the commercial activity of the Group’s integrated business model. The main participants in this part of the value chain are Customers served within the Group’s operational segments.

The upstream part of the Group’s value chain, together with its own operations, constitutes the **operational scope** necessary to conduct **business activities**. The upstream segment is associated with all providers of services and products to the Group (e.g., suppliers of energy, electronic equipment, office supplies, and various services, including advisory services). The main participants in this part of the value chain are suppliers and business partners, as well as investors providing the Bank’s financial capital.

The Group’s internal functioning, i.e. its own operations, include the activities required to support business operations, including the management of business processes, administration of buildings, equipment and services used in day-to-day

operations, and the consumption of resources such as energy and water by the Group’s own workforce, including the Bank’s subsidiaries. Participants in this part of the value chain include employees under employment contracts and contractors.

For the purposes of this statement, the Group conducted a double materiality assessment of the value chain of its business model, where BNP Paribas, through its operational activities and core business, maintains a direct business relationship, particularly with Customers.



The value chain diagram is simplified but it reflects the diversity of services offered to our Customers and covers the Bank and the subsidiaries: TFI, GSC and Leasing Services.

Business strategy

In 2025, the Bank continued to implement the GObeyond strategy. The main objective of this strategy, adopted by the Management Board and the Supervisory Board in March 2022 for the years 2022–2025, was the further dynamic development of the Bank as an institution operating efficiently, with engaged employees and satisfied Customers, while positioning itself as a sustainability leader. Following several years of multi-stage scale building through acquisitions, the



GObeyond strategy focused on organic growth while maintaining a responsible approach to risk management. It is the Bank’s first business strategy fully integrated with the 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 continued. when defining the next strategic plans. In December 2025, we announced the Accelerate 2030 strategy for 2026-2030 described in the chapter [Strategy and prospects](#).

Sustainability targets

The quantitative targets of the GObeyond sustainability strategy are included in the table below. They allow the Group to monitor and evaluate the effectiveness of the products and services offered in relation to the sustainability targets.

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 area of impact of the Group’s sustainability action is to support the ecological transition 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 products linked to ESG assessment and performance, including Sustainability Linked Loans

The Group supports businesses across industries and sectors in their transition towards zero carbon. We also take measures to reduce our direct environmental impact (reduction of our own CO₂ emissions). The Group initiates sustainability projects in Poland through partnerships.

During the time horizon of the strategy, from 2022 to the end of 2025, we implemented the sustainability strategic targets presented in the chapter GObeyond strategy implementation – [Pillar POSITIVE](#) focusing on environmental responsibility. The Group is building social capital among employees through training programmes, the ESG Academy and employee volunteering. These activities are described in more detail in the section [Own workforce \(ESRS S1\)](#) and the presentation of [Pillar TOGETHER](#), the employee pillar of the strategy.

Information on actions taken in pursuit of the strategic targets is further presented under the individual strategic pillars (chapter [Strategy and prospects](#)).

Table 76. Targets defined in GObeyond sustainability strategy

Strategic target	ESRS	Strategy Pillar	Implementation 2024	Implementation 2025	Strategic target 2025
Share of sustainable funding ¹ [vs. 2021]	E1	Positive	11.6%	14.6%	4.5% » 10%

Strategic target	ESRS	Strategy Pillar	Implementation 2024	Implementation 2025	Strategic target 2025
Share of sustainable assets under management [vs. 2021] ¹	E1	Positive	27.3%	32.1%	5% » 30%
Social engagement of employees ²	S1	Positive	2h 03’’	2h 40’’	4h
Branches certified as ‘Barrier-free facilities’ [vs. 2021]	S4	Positive	41.5%	41%	18% » 50%
Reduction of CO ₂ emissions from operations [vs. 2019]	E1	Positive	59%	61%	55%
Participation of women on the Bank’s Management Board [vs. 2021]	ESRS2/G 1	Together	37.5%	37.5%	22% » 30%
Reducing the adjusted pay gap [vs. 2021]	S1 ³	Together	3.8%	3.7%	7.3% » <4.0%
Net Promoter Score of employees eNPS [vs. 2021]	S1	Together	27	20	-9 » 20
NPS Retail Banking and Personal Finance	S4	Up	#6	#6	TOP3 ⁴

1 - total sustainable loans and advances/total loans and advances (portfolio measured at amortised cost)
2 - average annual engagement in hours per employee
3 - in ESRS S1, the Bank presented the unadjusted pay gap, in compliance with the ESRS definition
4- NPS benchmark among individual customers of banks in Poland

Under the GObeyond strategy, the Bank delivered on its ambitions related to the share of sustainable financing, significantly exceeding the strategic target of 10%. At the end of 2025, the share reached 14.6% (up from 4.5% at the end of 2021). The Bank achieved its target for the share of sustainable assets under management, reaching 32.1% compared with an initial level of 5%. These results reflect the consistent execution of the business strategy, close cooperation with Customers and a product offering tailored to their needs. In terms of Customer satisfaction (NPS), the Bank ranked 6th at the end of 2025, placing it in the middle of the market.

BNP Paribas Bank’s sustainability strategy incorporates the Group’s key impacts, risks and opportunities. Its implementation is embedded in the strategic plan through a dedicated sustainability pillar (POSITIVE). The strategy is built on strategic pillars designed to accelerate the delivery of the Group’s commitments, including in its own operations:

- The target for reducing greenhouse gas emissions from own operations was achieved: emissions were reduced by 59% in 2024, exceeding the 55% reduction target versus 2019, and reached 61% in 2025.
- The proportion of women on the Bank’s Management Board stood at 37.5% at the end of 2025.
- The adjusted gender pay gap was reduced almost by half, from 7.3% in 2021 to 3.7% in 2025.
- The employee Net Promoter Score (eNPS) reached the target of 20 points (the decline versus 2024 was partly due to the announcement of changes to the hybrid work model shortly before the survey).



- The indicator related to social engagement was achieved at 67% of the target, with year-on-year improvement (2h 40min in 2025 vs. 2h 3min in 2024).
- The target for Customer Centres certified as “Barrier-Free Facilities” was achieved at 41.5%, indicating progress, although below the planned 50%.

Operational processes on sustainability issues require continuous improvement. Key challenges include:

- **Obtaining information on the ESG risks** to which the Group’s Customers are exposed. In order to understand these risks, the Bank uses, among others, the ESG Assessment process and the ESG Risk Assessment. The Bank is seeing a gradual improvement in awareness among Customers of the identified risks.
- **Availability and reliability of ESG data** – determining ESG targets and 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. It limits the accuracy of measurement and hinders the setting of specific targets including reduction targets. Furthermore, the Omnibus regulatory package significantly reduced the number of entities required to report under the CSRD, which is likely to slow down the improvement in available data quality.

Interests and views of stakeholders (SBM-2)

Engagement with stakeholders we have an impact on and who impact our organisation 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. The Group constantly strives to improve the transparency of its communications with key stakeholders.

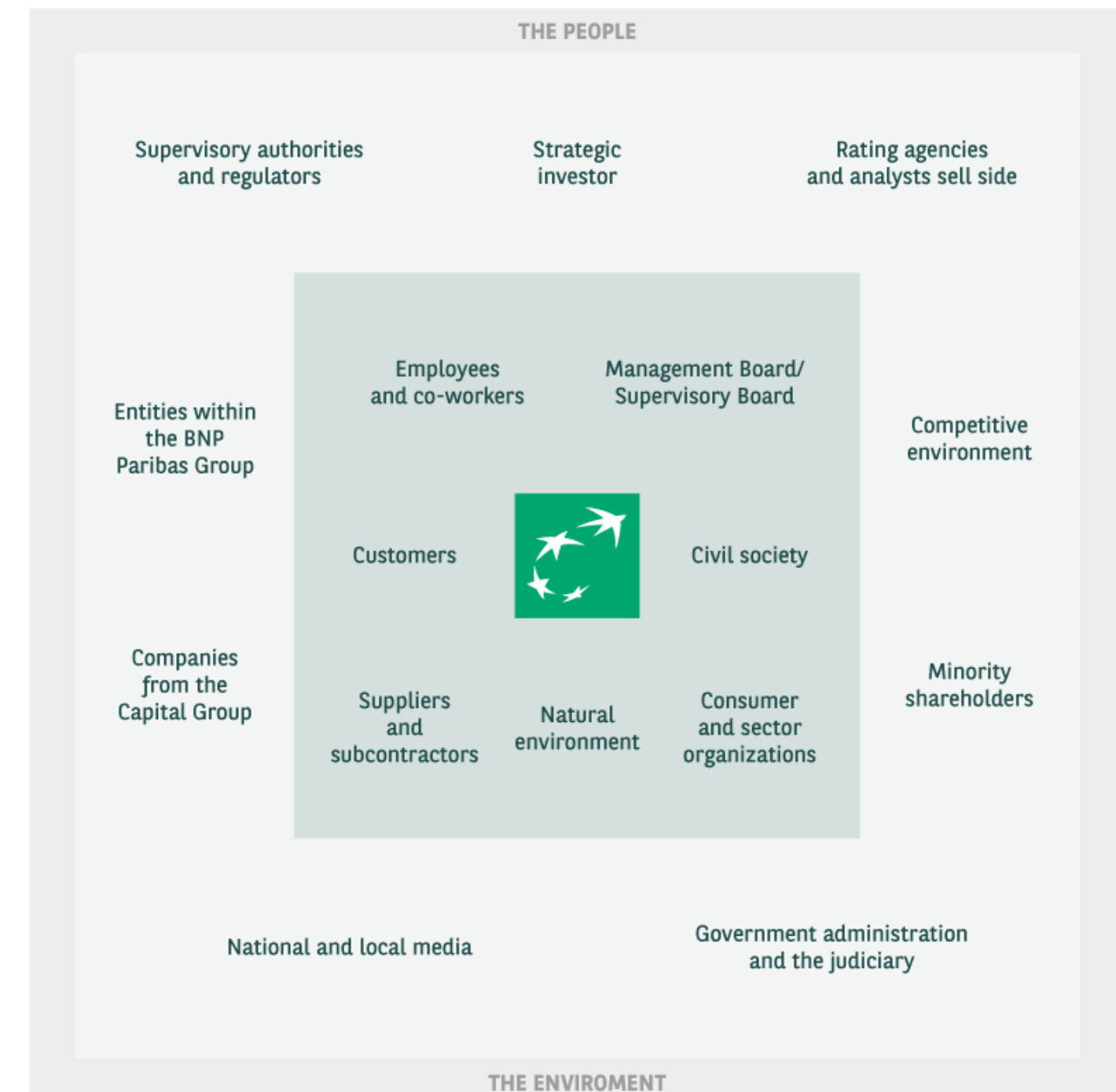
In summary, conducting a constructive dialogue with key stakeholders aims to achieve the following:

- **Anticipate business changes** and improve our products and services.
- **Optimise risk management** by listening to internal and external stakeholders and developing a positive dialogue with them to implement proactive risk management.
- **Innovative solutions** that have a positive impact on society. We listen to our stakeholders and fulfil our economic, social, and environmental responsibilities.

Key stakeholders of the Group

In 2025, the Group updated its map of key stakeholders in accordance with the AA1000 SES standard. The process was carried out during internal workshops involving Bank employees and representatives of subsidiaries who maintain relationships with specific stakeholder groups as part of business processes.

As part of the assessment, the Bank’s impact on each stakeholder group and the impact of each group on the Bank’s activities were evaluated on a scale from 1 to 5. Stakeholders for whom both values were equal to or higher than 2.5 were classified as key stakeholders.



In addition, stakeholders were divided into two categories: stakeholders influenced by the Bank and stakeholders who are users of sustainability statements. As a result of the mapping exercise, stakeholder groups were identified, as presented in the diagram above.



As shown on the stakeholder map, the Group identifies a wide range of stakeholders representing different types and varying levels of engagement. These include Customers (retail, business and corporate), employees and employee representatives, shareholders (including the strategic investor), suppliers, rating agencies, regulatory authorities and public institutions, as well as civil society and its organisations. Some of these stakeholders, with whom the Bank maintains direct and regular communication, were included in the double materiality assessment described below.

Methods for organising dialogue with stakeholders

The Bank has an organisational structure that enables effective cooperation with stakeholders where actions are based s on a number of internal policies governing relations with them. For example:

- in relation to Customers – the Policy for protection of Customer interests defines the organisational rules and conduct standards that the Group must apply at every stage of the Customer relationship and throughout the entire product and service lifecycle (see the section [Consumers and end-users \(ESRS S4\)](#));
- in relation to suppliers – the sustainable supplier charter sets out the Group’s ethical principles and commitments towards suppliers, as well as the expectations placed on suppliers.

In addition, each stakeholder group has designated contact persons at the level of specific functions or business segments. This enables the Group to tailor and develop a variety of channels of dialogue with its stakeholders, the most important of which are presented below.

Main channels of dialogue by type of stakeholder

Stakeholder group	Contact persons	Channels of dialogue
Customers 	Dedicated sales teams tailored to the profile and needs of Customers. Experts provide support to Customers or specific sectors (large companies, financial institutions, SMEs and mid-caps, entrepreneurs, associations, micro-enterprises, etc.).	• Network Promoter System which integrates the Net Promoter Score, relationship surveys, transaction surveys • Handling complaints in each unit of the Group and through the Customer Ombudsman
Employees and co-workers 	Human Resources Management Area and Communication, Marketing and Social Engagement Division	• Pulse check • MiSie • Intranet • Mailing • Regular meetings with the Management Board

Stakeholder group	Contact persons	Channels of dialogue
Investors, rating agencies, analysts 	Investor Relations Team	• Whistleblowing channels • Quarterly performance presentations • Investor meetings • Investor chats
Suppliers and subcontractors 	Procurement Management Department	• Events dedicated to the Group’s key suppliers covering sustainable supply chains • Manuals for suppliers including ESG content • Satisfaction surveys
Supervisors and regulators 	Management Board and Organisation Office	• Regular knowledge exchange and compliance with corporate governance practice • In addition, each area contacts the relevant authorities directly
Civic society and its organisations 	Corporate Communication Department BNP Paribas Foundation ESG Strategy and Stakeholder Relations Office	• Participation in partnerships and associations • Meetings, discussion platforms, conferences • DMA dialogue sessions • Surveys examining the Group’s impacts

Consideration of the effects of stakeholder engagement

Dialogue with stakeholders is at the heart of the Group’s social and environmental responsibility. The interests and opinions expressed by employees and external stakeholders (investors, non-governmental organisations) make an important contribution to the process of shaping the Group’s strategy and making management decisions. Employees of the Group are involved in the strategy development process and co-created the assumptions for the current Accelerate_2030 strategy.



The Group consistently implements tools that enable regular listening to employees’ voice. The insights gathered are used to define strategic directions and to improve operational plans. Procedures for dialogue with employees or employee representatives are described under Own workforce (ESRS S1), section [Processes to remediate negative impacts and channels for own workforce to raise concerns \(S1-3\)](#). Employees and third parties can use the Bank’s whistleblowing system (see also ESRS G1, [Whistleblowing system](#)).

The Bank engages in dialogue with retail Customers 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 \(S4-2\)](#).

The Bank and its subsidiaries work with their suppliers. Regular business reviews of major suppliers are conducted. In 2025, we held a meeting as part of the “Procurement Academy” dedicated to key suppliers. The Group also offers them recourse in case of difficulties [see [Business conduct \(ESRS G1\)](#)].

The opinions and interests of the key stakeholder groups were included in the Group’s double materiality assessment. For more information, see below: [Methodology of impact materiality assessment](#)

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. The tools the Group uses to listen to employees include targeted surveys, social dialogue, employee networks and an alert platform.

We build an attractive and engaging workplace through an open dialogue with employees: Employee Voice. It is based on a collection of tools and processes that give employees 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 Organisational Culture Team, which works closely with the Internal Communications Team and the Customer Research and Knowledge Team in this regard. The role of the Team is to listen, analyse and draw conclusions and prepare recommendations from the feedback of employees given, among others, through surveys, and to take care of the selection and standard of surveys carried out in the organisation.

Pulse Check – periodic engagement survey

For many years, the main tool for gathering employee feedback has been the Pulse Check survey. This year, recognising the specific situation of persons cooperating with the Bank under B2C contracts, we conducted for the first time a separate survey tailored to this group, the Contractor Voice survey. Both surveys were carried out in October 2025, and their results are analysed by managers, the HR Area and the Management Board.

This year’s Pulse Check was the final survey conducted during the implementation of the Bank’s GObeyond strategy. We can report that the targeted indicators were achieved: the engagement index reached 77% (the strategic target for 2025 was 70%), and the employee Net Promoter Score (eNPS) reached 20 points (the 2025 target was 20).

Table 77. Pulse Check eNPS

eNPS	2025	2024
<i>Question: how likely are you to recommend BNP Paribas Bank S.A. as an employer to your friends and family?</i>	20	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 (96%) remains unchanged as 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* (94%). The eNPS for the Bank decreased by 7 points from the last edition to reach a score of 20. This year’s survey coincided with communications announcing an increase in office days to 30% and a reduction of remote work from home, which caused a drop in eNPS year on year.

The factors contributing most strongly to the overall high level of the indicators are the working atmosphere, development opportunities, and the culture of collaboration.

The engagement index is the arithmetic mean of two values representing the percentage of respondents who, in the Pulse Check survey, selected option 4 or 5 (on a scale from 1 to 5) in response to the statements: “Overall, I am satisfied with working at the Bank” and “I see my future in BNP Paribas Bank.”

We calculate the eNPS based on the answers 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 actions taken by the Bank” (critics group),
- choice of ratings 7 or 8 – means “I do not have an opinion on this topic and pro-employee actions in the Bank are neutral to me” (indifferent group),
- choice of ratings from 9 to 10 – means “I rate positively the actions taken for employees in the Bank” (promoters group).

Based on these results, the eNPS is calculated according to the formula: eNPS = % of promoters – % of detractors.



MiSie platform – feedback exchange

The MiSie feedback platform, launched in 2023, had around 7.5 thousand users at the end of 2025, of whom 97% were active on the platform.

Nearly half of employees provide feedback and take part in the weekly Friday 6 surveys, in which teams share their views on engagement and satisfaction. This creates a strong foundation for leaders and teams to jointly improve the working environment, using indicators such as climate, eNPS, managerial index, equal treatment and inclusion, collaboration, stress management, well-being, psychological safety and Customer focus. We continue to strengthen a culture of ongoing feedback through communication and educational initiatives. This year’s activities included training sessions delivered by Feedback Ambassadors entitled “Feedback – discover the path to meaningful relationships!”, Appreciation Day, the publication of inspiring interviews with leaders sharing good practices in working with feedback, and the promotion of using the platform to gather feedback when preparing for the annual performance review process.

Social dialogue

Social dialogue is essential in order to develop open and transparent communication between managers, employees, and employee representatives. There are trade unions at the Bank, representing and defending the professional and social rights and interests of all employees, both under collective and individual labour law. Trade union organisations 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 favourable provisions than those adopted by the generally applicable labour laws.

Trade union organisations 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.

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, neurodiversity, LGBT+, multiculturalism, age, parenting, etc. The activities of employee networks aim to promote respect, equal opportunities and strengthen a culture of openness and inclusion. The networks’ 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 2025, 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.

Alerts reported by employees

Group employees have the right to report in good faith threats to the general public interest or violations of standards, laws, internal procedures, including the Group Code of Conduct. For more information, see [Processes for engaging with own workforce and workers representatives about impacts \(S1-2\)](#)

Informing administrative, management and supervisory bodies

The management and supervisory bodies are regularly informed of stakeholder views and expectations on sustainability matters through the Chief Sustainability Officer and other units maintaining relationships with stakeholders. Sustainability matters raised by investors, the Group’s Customers and non-governmental organisations are analysed on an ongoing basis, and the relevant units of the Group provide appropriate information in response to incoming enquiries.

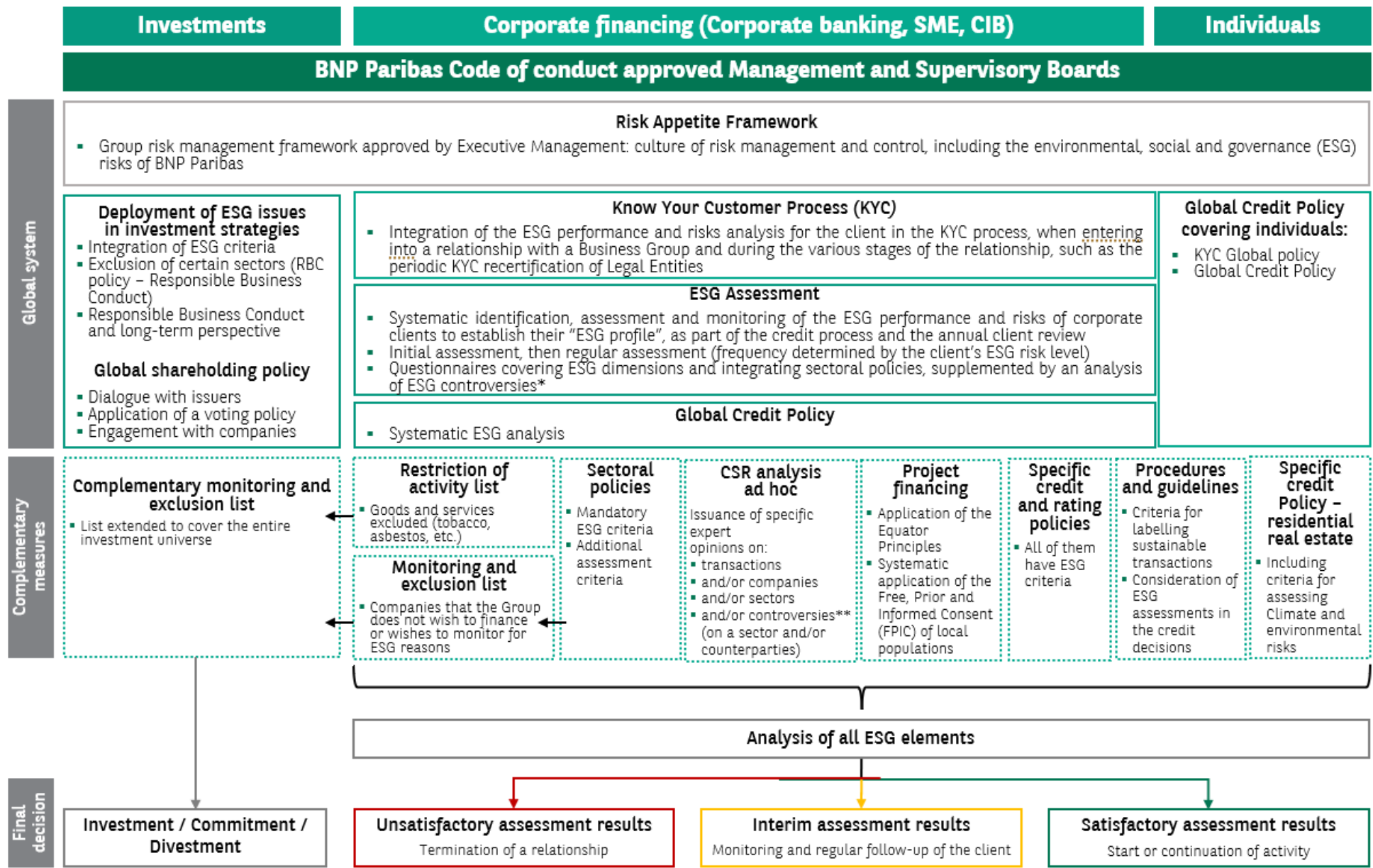
Managing impacts, risks and opportunities

Activities of the Group’s Customers may generate both positive and negative ESG impacts, risks and opportunities. In order to mitigate actual negative impacts and risks and monitor potential negative impacts and risks, the Group employs a comprehensive system for identifying them in the Group’s operations, covering environmental, social and 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 material impacts, risks and opportunities, in particular through the risk assessment processes in the Risk ID tool described in this chapter under [Financial materiality assessment methodology – the 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 factors are considered in credit and investment committee meetings. The complete system is shown in the diagram below:



ESG risk analysis system in Group operations in 2025



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 Assessment (DMA) and identify material impacts, risks and opportunities (IRO) related to the Group’s operations and business. For this purpose, the Group used a number of criteria and thresholds described below.

The DMA process was conducted in accordance with an internally developed methodology. We reviewed the activities, business relationships and context resulting from a comparative analysis of the banking market in which we operate.

We mapped the GObeyond Strategy to the specific disclosure requirements identified in the ESRS. We also took into account the current regulatory environment, industry analysis of the banking sector, and priorities of the European Securities and Markets Authority (ESMA).

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 organisational processes, in order to gain a structured understanding of the Group’s operations including 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”, which were identified in the context of risks.
- Identify on the two sub-perimeters of the value chain:
 - actors within our value chain to define key stakeholder groups,
 - definition of impacts, risks and opportunities by 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”) in the identified sub-perimeters of the value chain in the short, medium and long time horizon.
- Determine the materiality threshold for impacts, risks and opportunities; when the rating is 3-medium and above on at least one of the three dimensions (of impacts, risks and opportunities), then the sub-topic is considered material.

The methodology for double materiality assessment is the same for all ESRS topics/ sub-topics, without distinction.

Methodology of impact materiality assessment

The methodology for identifying and assessing actual and potential impacts was based this year on information obtained from an analysis of our documents and an analysis of answers from our key stakeholders, consolidated and classified according to ESRS sub-topics, for all Group activities. The impact assessment was done in four steps:

- Development of an initial, broad list of impacts based on a banking sector benchmark, mapped to individual ESRS sub-topics. Each impact was assessed in terms of whether it is positive or negative, actual or potential, and whether it is relevant to the Group. We determined which part of the value chain it relates to, as well as its severity, scope and likelihood of occurrence, and for negative impacts, the level of irreversibility of the Bank’s impact on the environment and society.
- A multi-stage assessment of impacts depending on their type, carried out through:



- **surveys:** six different surveys tailored to Group employees, Customers, suppliers, social organisations, environmental organisations, and a mixed group consisting of industry organisations, analysts, BNP Group companies operating in Poland and the media;
- **external stakeholder panel:** in August 2025, representatives of key stakeholder groups were invited to an online dialogue session conducted in accordance with the stakeholder engagement standard AA1000 SES. Participants represented the following stakeholder groups: rating agencies and sell-side analysts, suppliers and business partners, experts, minority investors, Customers, consumer and industry organisations, supervisory and regulatory authorities, society and environmental groups;
- **expert workshops:** dedicated to specific disclosure requirements under individual ESRS;
- **document analysis:** complaints, exit interviews and available internal studies.

At each stage, where possible, severity, scope, likelihood and irreversibility of impacts were assessed. Each assessment was carried out on a scale from 1 to 5.

- **Determination of impact materiality** by calculating weighted averages of the individual assessment stages on a scale of 1–5, where 3–5 indicated a material impact. We adopted the assumption that if at least one impact assigned to a sustainability sub-topic was assessed as material, the entire topic to which the sub-topic belongs is considered material from an impact perspective.
- **The analysis conducted by internal experts** was based on an expert review of the results of previous assessments and verification of the outcomes from the perspective of the entire organisation. Experts made the final determination of whether the identified impacts were not, in fact, mitigation measures for other negative impacts or the result of regulatory obligations and confirmed that the impacts presented were gross impacts (before the Group’s remediation actions, in line with EBA recommendations).

It should be noted that during the assessment of impacts, it was not possible to determine their time horizons with a sufficient level of certainty. In most cases, a conservative approach was applied, classifying the majority of identified impacts as actual and current, falling within the short- or medium-term horizon. This year, a methodological change was made in the impact materiality assessment: positive impacts were considered where the Group could differentiate them from financial opportunities and where they reflect positive external impact on society and/or the environment.

As a result of in-depth expert discussions and verification of whether all analysed impacts represent actual impacts of the Group rather than, for example, mitigation measures or compliance with legal requirements, the impact scores for the following sub-topics were lowered:

- climate-change adaptation;
- relationships with end-users (customer satisfaction, transparent and relevant information, complaints management, human rights, social inclusion) – this did not affect the materiality of the topic from an impact perspective;
- cybersecurity, market transparency and financial security, which were assessed as more relevant in the context of risks (i.e., the external environment’s impact on the organisation) rather than the organisation’s impact on society.

Financial materiality assessment methodology – the risk dimension

The materiality assessment methodology we use is based on the results of annual risk identification process, which aims to identify and assess all risks in the Group’s operations. This is done as part of a formalised, comprehensive and forward-looking process, using the Risk ID tool. Representatives of the organisational units responsible for measuring a given risk (e.g. operational risk, business risk, reputational 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 jeopardise the achievement of the Group’s mission and goals. The goal of this process is to provide information on changes in the internal and external environment and their impact on the activities of the Group. In conducting the analysis of the external environment, the Group considers among others factors related to infrastructure, economic conditions, risks, political changes, the legal environment, the natural environment, suppliers and service providers, Customers and competitors. Risks are assessed conservatively but the prevention and mitigation techniques relevant to operations or transactions, without which such operations or transactions could not exist, are considered in the risk assessment stage, including materiality assessment in the risk identification process.

To identify risks related to ESG factors, risk owners use a set of documents and analyses concerning ESG issues, including:

- **a review of major global risks** – a panorama of global risks for financial institutions. The review is based on an analysis of external studies and publications (both public and private) and aims to identify key economic, technological, commercial, socio-political and environmental trends, material risks and major transitions that may pose short-, medium- or long-term threats to financial institutions. A wide range of ESG issues is analysed as part of this review (climate change, natural environment, social issues);
- **a set of ESG studies, analyses and tools prepared by Group experts:**
 - quarterly ESG risk analysis and assessment;
 - assessment of the potential impact of physical risk on Customers and on residential and commercial real estate;
 - a sensitivity map of industrial sectors to transition risk and the effects of climate change (with or without considering insurance and public support schemes);
 - a sector classification map based on direct negative environmental impacts;
 - information on climate- and nature-related regulatory requirements.

The materials listed above support the identification and updating of the most likely scenarios triggered or exacerbated by ESG risk factors. Based on this information and their own expertise, participants in the Risk ID process representing various areas in the organisation, including ESG risk management experts, must assess the extent to which ESG risk factors may lead to risk materialisation. For this purpose, process participants identify:

1. **“risk events”** based on the Group’s risk taxonomy, such as business risk, reputational risk, credit risk, market risk, operational risk, etc., on which ESG factors may have a material impact;



2. “**risk factors**” that contribute to, trigger or exacerbate the risk event, including ESG factors, must be selected in accordance with the Group’s risk taxonomy;

3. “**risk assessment**” should include, among other elements, an evaluation of the severity and likelihood of the risk event in order to assess its materiality (expected potential loss).

Based on these elements, for each ESG area:

- the expected potential losses associated with risk factors material to that area are identified;
- they are compared with the Group’s materiality threshold. The materiality threshold is set annually as part of the risk identification. The following rule applies: if the materiality of a risk factor and its associated risk event exceeds the threshold, the area is considered material;
- the area is classified on a scale from 1–Minimal to 5–Critical:
 - material levels: 3–Material, 4–Significant, 5–Critical;
 - non-material levels: 1–Minimal, 2–Informational.

Additionally:

- For short-, medium- and long-term horizons considered in the materiality assessment, Risk ID participants must evaluate, for each ESG-related risk event:
 - the current materiality of the risk event, based on its severity and likelihood (likelihood results from the combination of frequency and inevitability), as well as its expected evolution over the next three years (short-term horizon);
 - the relative likelihood and severity of the risk event if it were to materialise within 10 years (medium-term horizon);
 - the relative likelihood and severity of the risk event if it were to materialise within 30 years (long-term horizon).
- In the assessment of climate risk, participants in the Risk ID process may rely on the results of climate stress tests; details of the approach are described in the section [Scenario analysis at the Bank](#).

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 materiality threshold is set annually as part of risk identification in ICAAP (Internal Capital Adequacy Assessment Process).

The key climate assumptions used in the Group’s financial statements are consistent with climate scenarios over a 20-year horizon presented in section [Scenario analysis at the Bank](#).

The materiality assessment used in this statement is based on the methodology and results of risk identification for 2025. The key climate assumptions applied in the Group’s financial statements (with respect to cost of risk) are based on the same scenarios as used in the stress tests, which form the foundation of the Risk ID for credit risk.

Opportunities assessment

The GObeyond strategy, running until the end of 2025, identified development opportunities for our Group. To be consistent with operational processes, the methodology for identifying opportunities in the double materiality process was based on defined strategic targets, as in 2024, including sustainability targets.

The opportunities assessment methodology was based on the following:

- **Step 1:** Identify a strategic commitment monitored through a performance indicator (strategic KPIs) linked to an ESG sub-topics;
- **Step 2:** Analyse nominal expected additional business income and cost savings associated with the Group’s own operations.

According to the methodology, the quantification of opportunities corresponded to the horizon of the GOBeyond strategy, i.e. the materiality of opportunities was assessed in the short term in 2025.

The opportunity identification and assessment methodology applies to all ESRS topics and is not specific to climate change.

Governance and internal control

The individual parts of the impact, risk and opportunity assessment are carried out respectively by the ESG Strategy and External Stakeholder Relations Office, the Risk Processes and Reporting Department, and the Investor Relations and ESG Reporting Office. The results are then consolidated and presented for approval to the Bank’s Management Board and for information to the Audit Committee.

The assessment of impacts, risks and opportunities is based on existing operational processes within the integrated governance and internal control system:

- The risk inventory is subject to three levels of validation and controls by the second line of defence.
- The targets related to the implementation of the strategic plan are covered by the same control system as other information reported by the Group, including the three lines of defence described in the chapter: Corporate Governance, section [Internal control system \(including control and risk management system for the preparation of financial reports\)](#), and earlier in the section General Disclosures (ESRS 2), under [Risk management and internal controls over sustainability reporting \(GOV-5\)](#).
- These mechanisms ensure that the DMA process complies with ESRS requirements, particularly with respect to reliability, completeness and appropriate documentation of the processes for identifying and assessing material impacts, risks and opportunities.



Summary of the double materiality assessment (DMA)

The Group’s approach to assessing materiality includes all identified areas of impact on sustainability. We consider a given topic/sub-topic to be material when:

- the Group’s impact on the topic is considered material by key stakeholders (at least 3-medium);
- risks generated by the topic (i) directly to the Group or (ii) indirectly through its financial activities, are above a certain annualised expected loss threshold;
- opportunities related to the topic are linked to the Group’s strategic targets, for which financial quantification was possible of the opportunity or cost reduction, exceeding the same materiality threshold as applied to risks.

In 2025, the Group carried out a review and update of the DMA process in accordance with ESRS requirements. As part of the review, an analysis was conducted of the Group’s business model and strategy, external factors, as well as a market benchmark. The analyses did not identify any changes in the material topics in terms of impact or financial materiality compared with the previous year. The list of ESRS-aligned material topics remained unchanged year on year. The double materiality assessment process, including the identification, evaluation and validation of material impacts, risks and opportunities (IRO), is subject to annual review. Its results may change in subsequent reporting periods, particularly due to updates to the Bank’s strategy, changes in the regulatory environment, or developments in market practice. The sustainability topics/sub-topics and their corresponding impacts, risks and opportunities assessed as material are presented in the following section (see also Table 78).



Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

DOUBLE MATERIALITY MATRIX BY SUSTAINABILITY TOPIC AS OF 2025

					1. Minimal	2. Informative	3. Important	4. Significant	5. Critical
Sustainability topic or subtopic					Impact	Risk	Opportunity	Relevance to the Group	
E	E1-A	Climate change adaptation	2	5	1	☒	Important		
	E1-B	Climate change mitigation	4	4	5	☒	Important		
	E2	Pollution	1	1	1	☐	Irrelevant		
	E3	Water and marine resources	2	1	2	☐	Irrelevant		
	E4	Biodiversity and ecosystems	2	1	2	☐	Irrelevant		
S	E5	Resources use and circular economy	1	1	2	☐	Irrelevant		
	S1	Own workforce	4	3	2 ²	☒	Important		
	S2	Workers in the value chain	2	1	1	☐	Irrelevant		
	S3	Affected communities	2	1	1	☐	Irrelevant		
Sustainability topic or subtopic					Impact	Risk	Opportunity	Relevance to the Group	
S	S4-A	Consumers and end-users (customer satisfaction, transparent information)	3	3	2 ²	☒	Important		
	S4-B	Customer security, including privacy	3	1	1	☒	Important		
G	G1-A	Anti-Corruption and Whistleblowers	3	1	1	☒	Important		
	G1-B	Business Conduct	4	1	1	☒	Important		
	G1-C	Political involvement and lobbying activities	1	1	1	☐	Irrelevant		
	G1-D	Relationship with suppliers	2	1	1	☐	Irrelevant		
	Gx	Cybersecurity	n/a ¹	3	1	☒	Important		
Gz	Gz	Market Integrity and Financial Security	n/a ¹	3	1	☒	Important		

¹ During the validation session, a topic identified as a response to a regulatory requirement should therefore not be interpreted as an impact – this does not impact the conclusions as the topic is material from a risk perspective.² Quantifying the 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	Potential / actual	Time horizon
Climate change (ESRS E1) ¹	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.	Potential/actual	Medium/long
				N Operational risk arising from environmental risk	Refers to environmental risks (caused by acts of nature or human activity) directly affecting the security of the Group, employees and Customers.	Potential/actual	Short/medium
	Climate change mitigation and energy consumption	Business activities	Negative impacts	Customers greenhouse gas emissions	The Group has an indirect impact on the climate by financing Customers that emit greenhouse gases.	Potential/actual	Short
			Positive impacts	Financing low-carbon investments	Positive impact on carbon dioxide emissions through low-carbon investments financed by the Group.	Actual	Short
			Risks	Business risk, credit risk, liquidity and financing risk arising from transition risks	Credit risk arising from stranded assets or decline in activity in certain sectors exposed to transition risk.	Potential/actual	Short/medium/long
				Reputational risk	Reputational risks associated with accusations of greenwashing and funding of sectors with high greenhouse gas emissions.	Potential	Short/medium/long
			Opportunities	Financing the low-carbon transition	Opportunity related to offering sustainable products and services that promote Customers' transition to a low-carbon economy.	Actual	Short
		Own operations	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.	Actual	Short
Own workforce (ESRS S1) ²	Employment in the Group	Own operations	Positive impacts	N Creating a friendly work environment, inclusion and diversity	Promoting an environment based on respect and equity, steady improvement of working conditions and enhancement of employee welfare.	Actual	Short/medium
				N Ensuring employee development through access to training and upskilling programmes	Increasing social capital, employee competences and position in the job market through a broad range of training and professional development opportunities for employees.	Actual	Short/medium
			Negative impacts	Discrimination, violence and mobbing in the workplace	Sporadic incidents of discrimination, violence and harassment at work.	Potential	Short/medium
			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.	Potential	Short
				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).	Potential	Medium/long
	Protection of Customers' interests,	Business activities	Negative 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 may be misleading.	Potential	Short/medium/long



Topic	Sub-topic	Value chain	Category	IRO	IRO description	Potential / actual	Time horizon
Consumers and end-users (ESRS S4) ³	clear, transparent and not misleading information		Risks	Legal and reputational risks relating to lack of information and complaints from Customers	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.).	Potential	Medium/long
	Social inclusion	Business activities	Positive impacts	Social inclusion	Non-discrimination in access to products and services by introducing facilities for, among others, seniors and people with disabilities and by adjusting and developing applications and digital tools for Customers experiencing any kind of difficulty.	Actual	Short
	Customer satisfaction	Business activities	Negative 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.	Potential/actual	Short/medium/long
			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.	Potential/actual	Short/medium/long
	Data protection	Business activities	Negative 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 GDPR) and/or loss or theft of confidential Customer information.	Potential/actual	Short/medium/long
Business conduct (ESRS G1)	Business conduct (including whistleblower protection)	Business activities	Negative impacts	Impact related to legal and reputational risks associated with corruption or influence peddling	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.	Potential/actual	Short/medium/long
	Corporate culture	Own operations	Positive impacts	Impact related to employees’ adherence to values and ethical principles	Declared values of the organisation, mission statement, Code of Conduct.	Actual	Short
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, monitor and report 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.	Potential/actual	Short/medium/long
	Cybersecurity	Own operations	Risks	Operational risks generated by cyber attacks	Operational threats to continuity and resilience: system disruption due to cyber attacks.	Potential	Short/medium/long
				Legal risks arising from cyber attacks	Legal risks caused by loss or theft of confidential data as a result of cyber attacks	Potential	Short/medium/long
				Reputational risks generated by cyber attacks	Reputational risk related to the Group’s ability to counter cyber attacks.	Potential	Short/medium/long

1. Employment in the Group is understood as employees hired under employment contracts, as well as those in a relationship with the Group under other forms of cooperation (contracts for services or civil law agreements). **N** new IRO in relation to 2024.

Reducing negative impacts in terms of ESG factors is possible through, among others, the following described above: assessment of ESG risks in the process of selecting counterparties, sector policies, a list of monitored and excluded companies, and KYC tools.

In the process of identifying risks, the impact of ESG factors on credit risk, operational risk, business risk, liquidity and financing risk was recognised. 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 adequacy 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 others, provisions for risk monitoring and reporting, and stress testing.

ESG risk emphasises traditional risks, which may impact 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 described in detail in the chapter Risk and opportunities, section: [Risk management system](#).

In order to mitigate negative impacts and potential and actual 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).

Current financial effect

Thanks to the financial quantification of risks and opportunities, we assessed which risks and opportunities impacted the Group’s situation in the current reporting period. For risks, taking into account the estimated severity and the likelihood of materialisation allowed us to identify key events that may have a material impact on the Group’s financial position in the next and subsequent reporting periods.

In 2025, the Group carried out climate stress tests, which are a key tool in financial risk management, enabling the assessment of the Group’s resilience to potential shocks resulting from climate change. A broader description is provided in ESRS E1 under [Description of the resilience of the strategy and business model](#).

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 statement 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	Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)
	9 b	Disclosures of the reasons why the application of these definitions of the time horizon is different	Financial materiality assessment: the risk dimension	Financial materiality assessment methodology – the risk dimension
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) In line with the PCAF guidelines Part A, the Bank used activity and economic data to estimate greenhouse gas emissions associated with its lending and investment activities, relying as far as	Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)



	Paragraph	Disclosure requirement BP-2	Related information	Sustainability Statement sections
	10 b	Description of the basis for the preparation of value chain metrics estimated using indirect sources	possible on data from primary sources and recognised secondary sources. When Customer data reported by the company (primary data) are not available on the reporting date, data from the previous year are used as the basis for estimates. The use of secondary data sources, such as emission factors and industry averages, results in less accurate information than relying solely on primary sources. The accuracy of the resulting financed emissions calculations is reflected in the average PCAF data quality score, which is calculated and disclosed for each sector.	
	10 c	Description of the level of accuracy resulting from indicators including value chain data estimated using indirect sources	The Bank invests in data collection systems, cooperates with Customers to obtain more actual data, and participates in industry initiatives aimed at improving financed emissions calculation methodologies, which may enhance the quality of emissions reporting in the future.	
	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	from 11a	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 Scope 3 category 15 (financed greenhouse gas emissions) - the estimation methods are consistent with common industry practice. It is recognised that reliance on external data sources, in particular the availability of high-quality emissions data for	Description of the resilience of the strategy and business model Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)

	Paragraph	Disclosure requirement BP-2	Related information	Sustainability Statement sections
	11 b (i)	Disclosure of information on sources of measurement uncertainty	counterparties and the resulting indicators, is inherently subject to measurement uncertainty as most counterparty emissions data are reported with a one-year delay or are generalised estimates rather than precise, counterparty specific values.	
	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 is 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 Sustainability Statement relate to the Group and the upstream and downstream value chain. The process for calculating the organisation's carbon footprint is described in section ESRS 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 88. 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 in 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 short term.



As in 2024, the topics covered by ESRS E1, S1, S4, G1 have been identified as material as a result of materiality assessment and are reported herein. In addition, the Group has identified two specific topics: financial integrity and security and cybersecurity. These are material in view of the analysis of risks for the previous year and may impact the Group’s financial results.

This report is the second Sustainability Statement of the BNP Paribas Bank Polska S.A. Group fully prepared on the basis of the ESRS. Due to the evolving reporting practice, we updated parts of our methodologies, for example by expanding the analysis of our Group’s impacts. We also took into account proposed regulatory changes and recommendations issued by supervisory authorities. We did not identify any errors in the presentation of last year’s data. All changes in data presentation compared with 2024 have been described within the respective disclosures to which they relate.

The Sustainability Statement includes:

- the disclosures required by Article 8 of the Taxonomy Regulation (2020/852) and its implementing acts. The disclosures are part of ESRS E1: this year, the detailed taxonomy tables are presented in Annex 2 for better transparency;
- 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 \(E1-6\)](#)).

To improve the transparency of the sustainability statement, the Bank has incorporated certain information by referring to other sections of the Management Board Activity Report or to other documents. The table below lists the disclosure requirements that are incorporated by reference:

Table 80. Disclosures incorporated by reference

ESRS	Disclosure requirement (DR)	Data point	Related information	Sustainability Statement section
				Statutory bodies of the Bank
2	GOV-1	21	Information on the composition and diversity of the administrative, management and supervisory bodies	Diversity of the administrative management and supervisory bodies
2	IRO-2	56	List of disclosure requirements complied with in the preparation of the sustainability statement and a table of all data points originating from other EU regulations	Appendix 1

ESRS	Disclosure requirement (DR)	Data point	Related information	Sustainability Statement section
G1	GOV-1	40 b	Expertise of the administrative, management and supervisory bodies on business conduct matters	Statutory bodies of the Bank
E1	E1-6	53-55	Gross GHG emissions intensity	Financial results of the Group Table 24, 25, 26, 27
E1	Disclosure under Article 8 of Regulation 2020/852 (Commission Delegated Regulation (EU) 2026/73			Appendix 2

Disclosure Requirements in ESRS covered by the undertaking’s sustainability statement (IRO-2)

See [Annex 1](#)



Climate change (ESRS E1)

Corporate governance

Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

Climate issues are not directly included in the remuneration of members of the management and supervisory bodies. Information on the integration of sustainability topics in the remuneration of members of these bodies is further described in General Disclosures (ESRS 2), [Integration of sustainability-related performance in incentive schemes \(GOV-3\)](#)

Strategy

Transition plan for climate change mitigation (E1-1)

Transition plan in the Bank

In 2026, the Bank developed a Prudential Transition Plan based on the requirements of the EBA Guidelines EBA/GL/2025/01 on ESG risk management. In the context of the ESRS E1 requirements, the Bank did not prepare its own transformation plan, however the Bank is fully committed to achieving the BNP Paribas Group’s objectives, by taking specific actions within its scope of impact. Therefore, it will among other things aim to achieve the targets related to the highest-emission sectors under the commitments aligned with the Paris Agreement, 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 transition and to reduce its carbon footprint.

The elements of the BNP Paribas Group’s transition plan related to climate change mitigation apply exclusively to the financial assets on the Group’s banking balance sheet. While the strategy, identified risks and policies cover all areas of the Group’s activities, certain actions, targets and metrics are specific to financial operations. The indirect transition targets relate in particular to financing provided to non-financial corporates. The BNP Paribas Group does not set an absolute greenhouse gas reduction target. Instead, it has established interim targets for reducing emission intensity in its credit portfolio in the sectors with the highest greenhouse gas emissions, with milestones set for 2030. The Group currently considers that its approach based on medium-term, sector-specific portfolio decarbonisation targets is consistent with its previous commitments and represents the most effective response to the challenges of decarbonisation. The Group has also set targets for reducing greenhouse-gas emissions from its own operations (Scopes 1, 2 and Scope 3 business-travel emissions), which can be achieved through improvements in building energy efficiency and sustainable mobility.

The Bank’s efforts to mitigate climate change

The Bank’s main lever as a financial institution is to use its position to support the sustainable transition of businesses. This is its key environmental commitment. To this end, the Bank consistently expands its range of products, services and other solutions that help Customers carry out their own transition and develop their sustainable investments.

These actions at the Bank consist of:

- Integrating climate considerations into its own operations and, in particular, into its analysis of Customers in the credit process, investment decision-making, reporting and risk management;
- Limiting support for activities with the greatest negative impact on the climate and credit exposure to greenhouse gas-intensive activities, primarily through dedicated financing and investment policies;
- Increasing support for low-carbon energy. The Bank participates in the financing of energy transition projects and companies particularly involved in this field, and also offers its Customers appropriate financial products and services: sustainability-linked loans (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. With corporate Customers and financial institutions in mind, the Bank has developed the ESG Assessment process. It provides a more harmonised, systematic, comprehensive and formalised review of ESG factors across the Customer’s entire activity, including within the credit process, from loan origination to monitoring and reporting. Initially, the ESG Assessment applied only to large companies, but in 2024 it was extended to medium-sized companies with turnover above EUR 50 million as well as to financial institutions. The ESG Assessment covers five ESG dimensions, including climate and environment, and provides an overview of the Customer’s ESG profile, complemented by a controversy analysis to ensure a comprehensive evaluation. Qualitative data for the ESG Assessment (including information for the controversy analysis) are provided by Business and verified by the Risk Department as part of the credit risk control function, enabling a balanced assessment of performance. The ESG Assessment supports decision-making in credit processes by strengthening and documenting due diligence regarding Customer’s sustainability commitments. The Bank also conducts an ESG risk assessment process.

The goal at the level of the BNP Paribas Group is that by 2030, low-carbon energies, primarily renewables, represent at least 90% of the Group’s financed energy mix. In addition to exiting the thermal coal sector, almost completed by the end of 2025, the BNP Paribas Group no longer provides any financing since 2023 to new oil or gas field development. The Group will reduce its outstanding loans for oil exploration and production by 80% and 30% respectively by 2030 compared to September 2022.

The Bank continues to advance its systemic approach to decarbonisation, including the development of solutions that support this process. The sectors listed below have the greatest impact on emissions in the credit portfolio and require targeted investment support:

- energy,
- food processing and agriculture,
- transport, shipping and logistics,
- manufacturing (wood processing, chemicals, rubber and plastics, non-metallic products, metal production, metal products).



Customers generating the highest greenhouse gas emissions were identified in the portfolio, along with the key decarbonisation levers relevant to these Customers. Tools and systemic solutions have been developed to support effective transition in the identified sectors.

Based on these analyses, the Bank has initiated commercial activities and is preparing a comprehensive product offering that covers not only Customers but also their suppliers. In the area of cooperation with corporate Customers, the Bank promotes climate mitigation initiatives in several variants, depending on the segment and profile of the enterprise. Large entities can benefit from Sustainability-Linked Loans, which allow Customers to set a CO₂ reduction pathway as one of several ESG targets in exchange for a reduced margin. A similar solution is the Decarbonisation Loan (currently in pilot phase), where the loan margin is partially linked to the borrower’s CO₂ reduction trajectory. Smaller enterprises may use the Green Loan, supported by non-repayable EU grants. To obtain financing under this scheme, Customers must present energy efficiency investment plans that meet the grant eligibility criteria. Within this offering, a project in the agro-food sector has been launched in partnership with Klim GmbH: nine of the Bank’s corporate Customers have begun Scope 3 decarbonisation projects by implementing regenerative agriculture practices among their suppliers. In addition to financing, the Bank provides access to national and EU support instruments. Combining banking products with these instruments helps Customers implement decarbonisation measures, reduce costs, lower energy consumption, cut emissions and strengthen their competitive advantage.

In supporting the transition of the national energy sector towards renewable energy sources, the Bank relies on the development of highly specialised teams and competences. In addition to dedicated experts in structured financing of long-term energy projects, the Bank has developed strong sector expertise. This enables continuous monitoring of developments in the energy sector, new projects and investors, and allows the Bank to respond to Customers’ specific needs. At the same time, the Bank leverages the experience and expertise of the BNP Paribas Group’s investment banking division in financing large-scale energy projects. These efforts translate into a growing share of the Bank’s financing of large-scale photovoltaic, wind and biogas projects.

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 \(IRO-1\)](#) under General Disclosures (ESRS 2) part, the Bank identified a number of climate-related material impacts, risks and opportunities (IROs).

Material impacts related to climate change mitigation and linked to the Bank’s business activities:

- Positive impact on CO₂ emission reductions through financing low-carbon investments by the Group.
- Indirect negative climate impacts through the financing of Customers that emit greenhouse gases.

Material risks related to adaptation to climate change and linked to the Bank’s business activities:

- Credit risk and operational risk arising from an increase in extreme, acute and chronic weather events (droughts, heat waves, floods, etc.).

Material climate change mitigation risks linked to the Bank’s business activities:

- Credit risk, business risk, liquidity and financing risk arising from stranded assets and/or the Group’s climate commitments which may lead to exit from or declining activity in certain sectors exposed to transition risks.
- Reputational risks related among others to accusations of greenwashing and financing of sectors with high GHG emissions.

Material opportunities 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 81. Links between IROs, policies, actions, metrics and targets in the Group

Category	Material IROs	Policy	Actions	Metrics and targets
Positive impact	Financing low-carbon investments	• GObeyond Strategy • Accelerate 2030 Strategy (from 2026)	• Supporting Customers in the transition to a low-carbon economy	• Share of sustainable financing amounting to 10%
Opportunity	Financing the low-carbon transition	• Credit policy • ESG policy towards the oil and gas		
Negative impact	Greenhouse gas emissions of Customers	• ESG policy towards the mining sector • ESG policy towards the coal power sector	• Implementation of ESG risk assessment and its use in the KYC / credit process	
Risks	Credit risk arising from physical risk	• ESG policy towards the nuclear energy sector	• Managing operational risk and reputational risk	
	Credit risks arising from transition risks	• ESG policy towards the agro-food sector		
	Reputational risk	• ESG policy towards the forestry sector – palm oil		
	Operational risks arising from environmental risks	• ESG policy towards the forestry sector – wood pulp		
	Liquidity and financing risks arising from transition risks			
	Business risks arising from transition risks			
Opportunity	Reduction of direct greenhouse gas emissions	• Energy management of buildings • Business Travel Policy	• Initiatives to decarbonise own operations	• Direct greenhouse gas emissions in the Group Target for 2025: reduction in CO2 emissions from operations – 55% and reduction in energy consumption – 35%

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 governance factors was defined. 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 2026-2028 was supplemented with limits for ESG risk set based on the risk measurement performed. ESG Risk Management Principles have also been developed, which include among others provisions for risk monitoring and reporting and stress testing.

Scenario analysis at the Bank

The Bank conducts climate stress tests. The most recent tests were conducted in 2025. The test methodology is based on the stress test approach proposed 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 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 CO₂ emission allowance prices	Impact on financial metrics, changes in which lead to a
	Disorderly transition			

	Hot house world		- GDP - Paths of CO₂ emission reduction according to scenarios	- reassessment of the Customer’s rating - Stimulation of the balance sheet structure in the long term
	Short-term	3 years		

The purpose of the tests is to assess the Bank’s resilience to various climate change scenarios – both transition risks (e.g., more restrictive climate policies) and physical risks (such as increased frequency of floods and droughts). The results indicate which portfolios are most exposed to losses arising from economic transition or climate change. The assessment of the reliability and availability of data for conducting the tests was also crucial for the Bank. 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 carries out an analysis of individual economic sectors in terms of their transition potential. The table below presents the credit exposure under the 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 scenario (‘delayed transition’) – 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 82. Analysis of selected economic sectors in terms of their transition potential

PKD section	Balance sheet exposure of the Group as of 31.12.2025 (PLN million)	Likelihood of failure/delay of energy transition		
		Net zero 2050	Disorderly transition	Current policies
Agriculture, forestry and fishing	9,171.5			
Mining and quarrying	49.0			
Manufacturing	12,786.7			
Electricity, gas, steam, hot water and air conditioning manufacturing and supply	1,395.0			
Water supply; sewerage, waste management and remediation activities	123.2			
Construction	2,403.4			
Wholesale and retail trade	7,660.2			
Transportation and storage	2,704.1			
Accommodation and food service activities	316.4			
Publishing, broadcasting and content production and distribution activities	3,079.8			
Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	6,934.9			
Financial and insurance activities	6,250.2			
Real estate activities	2,630.9			
Professional, scientific and technical activities	2,514.3			
Public administration and defence; compulsory social security	304.6			
Education	1,119.0			

PKD section	Balance sheet exposure of the Group as of 31.12.2025 (PLN million)	Likelihood of failure/delay of energy transition		
		Net zero 2050	Disorderly transition	Current policies
Human health and social work activities	31.4			
Arts, entertainment and recreation activities	96.7			
Other service activities	0.0			
Activities of households as employers and undifferentiated goods- and service-producing activities of households for own use	0.0			

Resilience of the Bank's business model

The Bank conducts an analysis of the resilience of its business model, recognising that it is essential to demonstrate how the strategy and business model can withstand and adapt to the materialisation of climate risks: both physical risks (e.g., extreme weather events) and transition risks (e.g., regulatory, technological and market changes linked to the energy transition). The Bank applies a comprehensive approach that integrates risk assessment with strategic and financial planning. Resilience is tested in the context of the Bank's ability to deliver its financial plan under various, potentially adverse, climate scenarios.

Climate stress tests are the key tool used by the Bank to assess and demonstrate the resilience of its business model. These tests make it possible to quantify potential financial losses over the short-, medium- and long-term horizon. The purpose of the process is to understand how shocks arising from physical and transition risks may impact the Bank's portfolio, revenue generation and ability to execute its long-term strategy.

A detailed description of the scenarios applied by the Bank is provided above in the section [Scenario analysis at the Bank](#). The tests include an assessment of the impact of climate risks on the Bank's main financial risk categories, i.e. credit risk, operational risk, and liquidity and funding risk. Integrating the test results into the budgeting process and strategic capital planning (ICAAP/ILAAP) is a key demonstration that the Bank actively manages climate risk and verifies the resilience of its business model. The results are directly used in the Bank's budgeting process, including by:

- providing quantitative estimates of additional credit losses under climate scenarios, which may be reflected in the risk appetite and key risk indicators;
- alerting to the need to maintain additional capital buffers to cover identified climate risks, influencing strategic decisions on capital allocation;



- identifying resilience gaps, leading to budgeting for adaptation investments (e.g., IT infrastructure upgrades, branch protection) and transition investments (e.g., development of sustainable finance products).

In 2025, the Bank continued scenario analysis to stress-test the resilience of its business model under different temperature rise pathways and economic transition trajectories. The analysis focuses primarily on credit risk, where the most material risks have been identified (physical and transition risks). For physical risks, the Bank considers flood risk (affecting property-secured loans) and drought risk, which significantly impacts the Agro sector. All other types of physical risk are currently assessed as immaterial for the Bank’s credit portfolio. For transition risk, the Bank applies a comprehensive approach, meaning that no material risks are excluded from the analysis. Immaterial risks are monitored but not included in sensitivity analysis. Simulation results indicate that the materialisation of physical and transition risks may affect selected products and portfolio segments. However, the overall expected impact on the Bank’s risk profile and financial stability remains limited. This is due to the Bank’s balance-sheet structure: maintaining high sectoral diversification and avoiding excessive concentration in high-emission industries, which naturally mitigates potential shocks. The projected financial effects remain within the risk appetite approved by the Supervisory Board, ensuring the Group’s financial stability. The sector diversified portfolio and proactive risk management practices, including sector policies restricting financing, effectively mitigate potential negative impacts of the transition.

Within the Internal Capital Adequacy Assessment Process (ICAAP), these tests serve as a tool for:

- verifying the strategy: confirming that the business strategy is resilient to the materialisation of climate risks over the strategic horizon;
- quantifying risk: translating qualitative climate risks into measurable capital impacts;
- setting targets: defining key risk indicators and capital targets that account for potential climate shocks.

The long-term resilience of the Bank’s business model is built on two pillars:

- risk mitigation: including consistent application of sector policies (such as exclusion of financing for certain industries), monitoring of key risk indicators and ESG risk assessment in the credit process;
- active financing of Customers’ energy transition, which systematically reduces the portfolio’s sensitivity to transition risks; assets identified as exposed to material physical risk are subject to enhanced monitoring and dialogue with Customers on climate mitigation actions.

Through risk identification, measurement, limits and capital allocation, the Bank safeguards its position to cover potential losses arising from potential materialisation of climate risks. The Bank assesses Customer risk in the credit process and, through sector policies and controversy analysis, introduces restrictions in its core business to avoid material exposures to sectors and companies most affected by climate change. It also promotes sustainable practices among Customers (e.g., through the Agronomist platform and cooperation with Klim GmbH). By combining risk-mitigation actions with strategic financing of climate mitigation initiatives, the Bank protects its financial performance while strengthening the long-term resilience of its business model.

The resilience of the Bank’s business model to climate risks is demonstrated through the systematic integration of climate scenario analysis into strategic risk management and the budgeting process. The Bank uses stress tests to quantify the potential financial impacts of physical and transition risks and then integrates these results into planning, capital allocation and investment decisions. This approach ensures that the Bank is prepared for the transition to a low-carbon economy while maintaining financial and operational stability.

The Bank views responsibility for addressing climate change as one of the key business opportunities identified in the DMA process. A material opportunity lies in offering sustainable products and services that support Customers in transitioning to a low-carbon economy, directly delivered through the development of products such as Sustainability-Linked Loans and financing for renewable energy and energy efficiency. The Bank’s approach assumes that Customer transition is a driver of the Bank’s growth, enabling the alignment of business objectives with environmental responsibility. Additionally, the Bank identifies an opportunity in reducing emissions from the Group’s own operations, which leads to lower operating costs. Managing the Bank’s exposure to climate risks is integrated into its business model. The previous GObeyond strategy and the Bank’s risk management framework directly addresses the material risks identified in the DMA: credit risk arising from intensifying extreme weather events (physical risk) and transition risks, including stranded asset risk in high-carbon sectors. Through the systematic withdrawal from coal financing and the implementation of ESG assessment in the credit process, the Bank also mitigates material reputational risk that could arise from accusations of greenwashing or financing emissions.

It should also be noted that resilience analysis is subject to uncertainty. Future climate developments (frequency and severity of weather events), the pace of technological progress and the dynamics of legislative change may differ from current model assumptions. The evolution of consumer behaviour and financial markets may accelerate or delay the materialisation of risks in ways that are difficult to estimate precisely today.

Managing impacts, risks and opportunities

Description of the processes to identify and assess material impacts, risks and opportunities (ESRS2 IRO-1)

The Group has identified the sources of greenhouse gas emissions in its own activities and since 2019 measures and publishes theme in its annual reports. Starting from 2024, it also measures the greenhouse gas emissions in its loan 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 2025 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 developed ESG assessment questionnaires in 2021, 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 activities of Customers in the Corporate and SME segments. 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 business activities.

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 business activities.

Based on the data collected in the credit process, the level of ESG risk of the Bank’s Customers in the Corporate and SME segments, including climate risk, is examined when new financing is granted, increased or the Customer is reviewed. After aggregating the results, according to the data as at the end of 2025, 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. 38% of Customers declare sensitivity to any type of physical risk. For the Micro-enterprise segment, the ESG analysis is carried out without the involvement of Customers and is based on the Bank’s internal model. The model assesses sensitivity to ESG risk factors, including transition risk and key physical risks (i.e., flooding, drought and rising temperatures). It also examines Customers’ dependence on the natural environment as well as the extent to which micro-entrepreneurs impact it.

Based on the aggregated model results, 38% of Micro segment Customers were identified as having a medium level of ESG risk, and 18% a high level. A particularly significant risk factor is exposure to drought, which is linked to the substantial share of agricultural loans in this segment (58% of credit exposure).

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 loan origination 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 divided 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 2025.

The breakdown of these risks was implemented on 30 June 2021, with the entry into force of the EBA/GL/2020/06 Guidelines of 29 May 2020 on loan origination and 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 as regards the disclosure of environmental, social and 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-emission sectors as of 31.12.2025 amounted to PLN 2.8 billion and increased year-on-year by PLN 0.3 billion. The Bank defines high-emission sectors using the list of industries set out in Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of 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 Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637. The list of high-emission sectors is presented in the table below, and exposures are assigned to these sectors based on the companies’ primary PKD codes. In previous years, the Bank also included agriculture among high-emission sectors. However, since the above Regulation does not cover this industry, the list has been aligned with regulatory standards, which effectively resulted in the exclusion of agriculture.



Table 83. Percentage of high-emission sectors in the Group’s loan portfolio as at 31 December 2025 (for non-financial corporates)

Sector	2025	2024
car	0.6%	0.8%
aviation	0.0%	0.0%
cement	0.1%	0.2%
coal	0.0%	0.0%
oil and gas	0.1%	0.1%
energy	1.4%	0.9%
ships and water transport	0.1%	0.1%
steel manufacturing and processing	0.8%	0.9%
Total	3.2%	3.0%

Policies related to climate change mitigation and adaptation (E1-2)

Policies related to the Group’s financing and investment activities

The Group has established a range of principles which govern its activities and business relationships. 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>). Seven of these are directly related to climate change:

- ESG policy towards the coal power sector,
- ESG policy towards the oil and gas sector,
- ESG policy towards the mining sector,
- ESG policy towards the nuclear sector,
- ESG policy towards the agro-food sector,

- ESG policy towards the forestry sector – palm oil,
- ESG policy towards the forestry sector – wood pulp.

By limiting the Bank’s exposure to high-carbon sectors, these policies also limit transition risks.

These policies, consistent with the BNP Paribas Group, are continuously inspired by its interaction with its stakeholders, including investors, NGOs, etc., and through best practice of international or sectoral bodies.

Policies regarding the Group’s own activities

The Group’s approach with regard to its direct impact on 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 Group has defined policies relating, among others, to energy management in buildings and business travel, which contribute to reducing the carbon footprint of its operations.

At the Bank, two documents are in place which govern environmental and climate approaches:

- Integrated Environmental and Energy Management System,
- BNP Paribas Bank’s Environmental and Energy Declaration.

The Bank also has a business travel management policy, in which it recommends to apply best practice for reducing CO₂ emissions, which contributes to reducing the impact of its activities.

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 in the other companies of the Group.

Table 84. Summary of the Bank’s main policies for managing impacts, risks and opportunities related to climate change

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 organisation responsible for implementing the policy	Interaction with stakeholders
ESG policy towards and the oil and gas sector	The document sets out the commitments made by the Group in its business relationships with companies in the oil and gas sector. It refers in particular to challenges of mitigating the effect of climate	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. A copy of the policy is regularly distributed to actual and potential customers in the KYC process or when discussing any financial service offered.



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 organisation responsible for implementing the policy	Interaction with stakeholders
	change and sets out the framework for financing arrangements, defines the criteria for granting financing and identifies sector exclusions.			
ESG policy towards the mining sector	The document sets out the commitments made by the Group in its business relationships with companies in the mining sector. It refers in particular to challenges of mitigating the effect of climate change and sets out the timeline for exiting the financing of thermal coal.	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. A copy of the policy is regularly distributed to actual and potential customers in the KYC process or when discussing any financial service offered.
ESG policy towards the coal 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. A copy of the policy is regularly distributed to actual and potential customers in the KYC process or when discussing any financial service offered.
ESG 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 refers in particular to challenges of mitigating the effect of climate change and 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. A copy of the policy is regularly distributed to actual and potential customers in the KYC process or when discussing any financial service offered.
ESG policy towards the agro-food sector	The document sets out the commitments made by the Group in relation to the financing of companies in the agricultural sector. It refers in particular to challenges of mitigating the effect of climate change and 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. A copy of the policy is regularly distributed to actual and potential customers in the KYC process or when discussing any financial service offered.
ESG policy towards the forestry sector – palm oil	The document sets out the commitments made by the Group in relation to financial services and asset management for the palm oil sector. It refers in particular to challenges of mitigating the effect of climate change and 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. A copy of the policy is regularly distributed to actual and potential customers in the KYC process or when discussing any financial service offered.
ESG policy towards the forestry sector –wood pulp	The document sets out the commitments made by the Group in relation to the financing of companies in the wood pulp sector. It refers in particular to challenges of mitigating the effect of climate change and 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. A copy of the policy is regularly distributed to actual and potential customers in the KYC process or when discussing any financial service offered.
CSR Declaration for Suppliers	The document describes the mutual ESG commitments made by the Group and its suppliers.	The declaration applies to the activities of the Bank. Appropriate regulations have	Vice-President of the Bank	The declaration is provided to each supplier during the supplier assessment process. Publication on the Bank’s website



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 organisation responsible for implementing the policy	Interaction with stakeholders
	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. It refers in particular to challenges of mitigating the effect of climate change.	been implemented in the Bank’s companies in accordance with the principle of proportionality		
ESG/CSR Declaration of Partners (Agents, Contractors, Vendors) 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. It refers in particular to challenges of mitigating the effect of climate change.	The declaration concerns the activities of the Bank	Executive Director of Sustainability 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. It refers in particular to challenges of mitigating the effect of climate change, in particular by seeking energy efficiency of buildings.	The declaration concerns the Bank’s activities	Managing Director of the Bank’s Internal Services Division	Publication on the Bank’s website
BNP Paribas Polska – Business 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. It refers in particular to challenges of mitigating the effect of climate change related to business travel.	This 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 transition risks while minimising its impact on the most carbon-intensive activities, projects and sectors. They indirectly allow financing and investments to be targeted towards opportunities that arise from actions and projects aligned with the Paris Agreement.

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:

- Bank assesses ESG risks [see [Material impacts, risks and opportunities and their interaction with strategy and business model \(SBM-3\)](#) under: General Disclosures (ESRS 2)], thereby improving knowledge of Customer and their impact on climate change. It allows for a better understanding of the Bank’s risks and more effective support to Customers in their transition.
- The Bank supports its Customers in the transition to a low-carbon economy through a range of sustainable products and services, as outlined in section Implementation strategy GObeyond, [Pillar POSITIVE](#).
- Since 2024, the Bank monitors the emission intensity of loan portfolios in high-carbon sectors.
- The Bank implements solutions to reduce greenhouse gas emissions from its own activities.

Actions related to the management of climate impacts and climate risk

The Group, through its activities for Customers and projects supporting a low-carbon economy, contributes to the energy transition. 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.

Assessing Customers’ climate effectiveness

The ESG risk assessment is used by the Bank to obtain a comprehensive view of a Customer’s activities. It provides insights into how Customers approach ESG aspects, including their performance in climate transition and exposure to physical risks. It supports the analysis that enables the Group to direct financing towards Customers and projects aligned with the decarbonisation trajectory. The Bank carries out ESG risk assessments of Customers, taking into account climate risks. In 2025, 9,557 ESG risk assessments were carried out and 232 Customers operating in sensitive sectors were analysed on the basis of sector policies.

In 2024, the ESG Assessment process was extended to include 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 2025, a total of 127 Customers were analysed under this process. The ESG Assessment process is also used to better understand our Customers’ sustainability transition and their strategies in relation to climate change.

In 2025, the scope of the ESG assessment was further expanded to include corporate Customers with annual turnover above EUR 50 million who are applying for financing for the first time or increasing their credit exposure by more than EUR 15 million.

Supporting Customers in decarbonisation

In 2025, the Bank continued its decarbonisation efforts. The focus was placed on action and implementation of the identified decarbonisation levers for individual sectors, with particular emphasis on the agro-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 transition including loans linked to decarbonisation targets.

To support the decarbonisation of Customers’ supply chains, primarily in the agro-food sector, the Bank has started working with Klim GmbH. The company uses a unique methodology based on soil analysis and satellite imagery, ensuring full transparency and regulatory compliance. Thanks to the regenerative agriculture practices implemented by Klim GmbH in cooperation with the Bank, food producers and distributors can reduce greenhouse gas emissions in their supply chains (Scope 3) by up to 20-30%. Regenerative practices help to reduce CO₂ 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, improve soil fertility and protect 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 capturing carbon. The credits are purchased by the buyers of the raw materials produced by the farmers, providing farmers with an additional source of income. Food producers who engage in sustainable regenerative agriculture can 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 transition of agricultural production towards sustainability. Agriculture is key to addressing environmental challenges (e.g. carbon emissions, biodiversity loss, water use, deforestation) and social challenges. It is 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 agro-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 transition of agro-food producers and companies, best practices and an innovative solution related to reducing the environmental impact of the agro-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 soil 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 of industry organisations and sustainability partnerships

The Bank interacts with the business community and actively participates in environmental footprint mitigation initiatives. For this purpose, the Bank enters 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 Warsaw, supporting environmental action and the Sustainable Development Goals. In partnership with leading organisations in the agro-food sector, the Bank carries out projects focused on managing, protecting and restoring biodiversity,
- Partnership with POHiD – Modern Distribution Congress. As a partner of the Modern Distribution Congress, the Bank actively contributes to discussions on the future of the retail and distribution sector and its supply chains, emphasising the importance of sustainable development. The Bank uses this platform to promote solutions supporting environmental and social transition and to share its experience in financing sustainable transition,
- Strategic partnership with Chapter Zero Poland. The Bank is a supporting partner and Patron of Chapter Zero Poland – a programme aimed at developing the competences of management and supervisory boards in climate-risk management. As part of this cooperation, the Bank supports climate education for senior executives, strengthens the integration of ESG considerations into business decisions, and co-creates a platform for knowledge exchange among market leaders.
- Dairy Cooperative Forum and the Polish Chamber of Milk. In cooperation with the Dairy Cooperative Forum and the Polish Chamber of Milk, the Bank engages in the sustainable transition of the dairy sector. The Bank supports dialogue on green

investments, environmental innovations and responsible agricultural production, acting as a financial partner for change within the industry.

- 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 opportunities

According to the *World Energy Outlook* published by the International Energy Agency in 2025, global investments in the energy sector are expected to reach USD 3.3 trillion in 2025. The share of global spending on low-emission technologies has been steadily increasing since 2022. In 2025, such technologies were expected to account for two-thirds of total energy investments (nearly USD 2 trillion). In the Net Zero Emissions scenario, clean-energy technologies and infrastructure have represented almost 90% of power-sector investment since 2020, and according to the IEA’s projections, this share is expected to approach 100% by 2035. 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 GObeyond Strategy for 2022-2025, 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 GObeyond strategy, which is 10%. In 2025, the value of the sustainable financing portfolio amounted to PLN 13.6 billion, representing a 14.6% share of sustainable financing. Details and availability rules are described in the chapter Implementation of the strategy, Filar POSITIVE., section [Sustainable financing](#), pages 52-55.

BNP Paribas offers a range of banking and non-bank solutions to support its Customers in the energy and environmental transition. These offerings cover a wide range of climate-related areas, including reducing energy consumption and financing projects aimed at lowering greenhouse gas emissions.

- The Bank relies on specialised teams dedicated to financing and providing expert support to Customers in their transition towards a low-carbon economy across all segments, from strategic and international Customers to mid-caps and SMEs, as well as on the Decarbonisation and Biodiversity Office. In particular, the following areas offer significant opportunities:
- zero-emission energy production: financing that supports the development of new renewable energy generation capacity;
- decarbonisation of industrial production processes: support for Customers throughout their environmental and energy transition strategies, including efforts to reduce energy consumption, decarbonise energy use and lower greenhouse gas emissions;
- sustainable mobility: support and financing for companies and entities operating in the mobility sector, including public transport operators and manufacturers;



- food production sector (agriculture and food industry): a comprehensive offering that supports the transition of the food system, decarbonisation and the development of regenerative agriculture practices as a lever for decarbonisation and income resilience across the food value chain. The offering includes banking and non-bank products, such as cooperation with the Klim platform.

To support individuals in purchasing property and undertaking energy renovation projects, the Group has developed services and solutions that assist Customers in their projects. The My Sustainable Home initiative, introduced by BNP Paribas Group and implemented in Poland as Mój Dobry Dom, structures the approach of operational units around four main levers:

- education: raising awareness and advising Customers on creating and collecting energy performance certificates, including the requirement to gather data when issuing a new dedicated mortgage loan;
- supporting the purchase of energy-efficient goods through favourable financing conditions;
- meeting the needs of building energy transition through preferential-rate loans or loans supported by public aid programmes;
- developing non-financial services through partnerships that support comprehensive energy renovation pathways, from defining the scope of work to verifying environmental impact after completion.

To address challenges related to sustainable mobility in everyday travel, the Group supports Customers by offering services and solutions in the field of sustainable mobility:

- The BNP Paribas Group's mobility offering includes products that enable Customers to finance new electric vehicles through loans, leases and long-term rental, supporting the circular economy, as well as second-hand electric and low-emission cars.
- Customers can access financial products in bank branches, at partner locations and via the mamGO platform. The platform also provides key information on electromobility and features an educational blog.
- BNP Paribas Group products could also be used in conjunction with the government programme NaszEauto.

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. Starting in 2020, electricity from renewable sources accounted for 100% of total energy consumption. It

comes from the purchase of green electricity with guarantees of origin and from offsetting dirty energy with purchased appropriate electricity certificates or direct consumption of renewable energy produced by the Group's own photovoltaic systems. The total energy consumption was 38,758 MWh in 2025 and 38,937 in 2024. The consumption of purchased thermal and electrical energy alone in the Group amounted to 76,424 GJ in 2025 vs. 70,651 GJ in 2024. This increase was due to the fact that 2024 was statistically the warmest year in Poland's history, but one without a hot summer that would have placed a heavy load on air-conditioning systems. As a consequence, energy and heat consumption in 2024 was lower than in 2025.

Low-carbon energy 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 2025, GHG emissions from Scope 1, 2 and 3 (Category 6) amounted to 7,860 tCO₂e, a decrease of 61% compared to 2019. According to the target defined in GObeyond 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.

Actions taken at the Bank to reduce the carbon footprint of buildings

In addition to the use of green energy, the Bank is successively installing photovoltaic systems at its locations. At the end of 2025, 23 photovoltaic systems were in operation.

Along with the use of renewable energy sources, the Group is minimising energy consumption by introducing energy-efficient initiatives. 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. Remotely controlled heat pumps, or miniBMS BMS (Building Management System) controlling the schedule of the most energy-intensive installations in the network locations have been launched at 20 locations. At the central locations, the Group is optimising operations for the HVAC system (heating, ventilation, air conditioning) using the. The waste is segregated at 85% of locations.

The Group also raises awareness among employees on a daily basis on the efficient use of energy. These efforts are supported by the ongoing work of the team responsible for ISO 50001 and 14001 standards within the integrated energy management system. To this end, continuous education and internal communication are carried out to promote proper use of equipment and building systems, contributing to the reduction of energy consumption and CO₂ emissions.

Environmental certification

In 2025, the Bank obtained ISO 14001 and ISO 50001 environmental certifications, covering the Bank's headquarters and 10 additional locations. The certification confirms compliance with international standards for environmental and energy management. In the next steps, the principles covered by these certifications will be gradually extended to the remaining Bank branches. Following the certification, an energy review was carried out for the entire Bank, and a dedicated team was appointed to develop and enhance a continuous improvement system that enables ongoing monitoring and optimisation of how the Bank manages energy and environmental performance.



Sustainable IT initiatives

The Sustainable Digital approach defines ten principles that apply to IT in the Bank. The New Technology and Cybersecurity Area uses multiple decarbonisation levers:

- 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 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.
- The Bank considers reduction of the carbon footprint associated with digital channels, marketing activities, communications and IT processes. The Bank takes into account environmental objectives when conducting its technological transition, 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,
 - upgrading, consolidating and virtualising equipment in the Data Centre,
 - shifting equipment management to a circular economy approach. The Bank manages the life cycle of equipment to reduce the amount of waste generated during its life cycle (e.g. reuse of IT equipment). In 2025, employees repurchased 3,384 IT devices (mobile phones, laptops, PCs, screens) under the implemented policy. 112 devices (screens, PCs, laptops, printers) were donated to charitable organisations,
 - defining environmental criteria for IT purchase: energy consumption assessments were introduced as qualitative elements of the criteria in the tender proceedings in New Technologies and IT Support,
 - raising awareness of the carbon footprint generated by applications when developing banking systems,
 - equipment that is unusable is handed over to a specialised company for disposal. In 2025, more than 8,000 IT devices were donated to ElektroZłom.pl by the Bank,
 - the use of certified and recycled paper for printing equipment at the Bank as well as in mass correspondence.

Sustainable mobility initiatives

Every year, we carry out a range of initiatives supporting sustainable mobility in the area of business travel and fleet use. For local business trips, employees are enabled to use public transport through a dedicated application, which eliminates the need to print tickets or submit paper-based expense reports. This supports the policy of reducing resource consumption

and promotes the use of public transport for local business purposes. For intercity travel, we encourage the use of trains and long-distance buses by providing convenient booking tools and promoting low-emission transport options.

In line with BNP Paribas Group recommendations, we have taken steps to reduce the number of business trips by verifying their necessity and promoting remote meetings, which helps lower travel-related emissions. At the same time, we are transforming our vehicle fleet, consistently phasing out petrol and diesel cars in favour of electric and hybrid vehicles. New fleet vehicles meet low- and zero-emission requirements, supporting the reduction of the Bank’s carbon footprint.

Sustainable mobility within our organisation also means ensuring user safety. We conduct numerous educational, communication and event-based initiatives, including family picnics, that build awareness of safe and responsible use of various modes of transport. In everyday operations, we encourage employees to choose alternatives to cars, especially for short distances, offering a wide range of mobility options and supporting habit change.

The measures introduced combine environmental, organisational and social aspects, strengthening a culture of responsible mobility, reducing emissions and increasing employee awareness. Our goal remains to further expand solutions that support climate neutrality, safety and sustainable development.

As part of the fleet electrification programme, the Bank aimed to phase out all diesel and petrol vehicles by 2025 in favour of alternative-drive cars. This commitment has been fulfilled based on orders placed, although due to delivery delays the vehicles were not yet in operation as of 31 December 2025. Following the delivery of the ordered cars, the target structure of the alternative-drive fleet will comprise 1,251 vehicles, including 83% hybrid and 17% fully electric cars. The transition to such vehicles supports the environmental objectives of the Bank’s GObeyond strategy for 2022–2025 and the updated electrification goals of the BNP Paribas Group.

Transition resources

The Bank maximises its positive impact on environmental issues mainly by supporting the transition of its Customers and offering them the right products, services and tools. At the same time, it mitigates 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 Area, which emphasises the Bank’s strategic approach to ESG factors. Its functioning is described in detail in the section General Disclosures (ESRS 2) – Governance. The Real Estate Office and the Administration Office are responsible for implementing the objectives related to own activities.

In 2025, nearly 100% of the Bank’s employees completed the mandatory e-learning course ESG Fundamentals at BNP Paribas Bank Polska S.A., which introduced them to the basics of ESG topics, including climate-related issues. In addition, the Bank promoted and encouraged all employees to expand their knowledge by participating in the comprehensive e-learning programme developed by the BNP Paribas Group: the Sustainability Academy.

In 2025, the Bank and Group companies once again organised ESG Days, a series of educational events dedicated to ESG topics. During ESG Days, employees explored subjects such as sustainable finance, products supporting the energy transition, and sustainable buildings. They could also participate in webinars led by in-house experts, focusing on the



Bank’s strategic approach to sustainability and related initiatives. As part of the MyWay training offer available to all employees, the Bank organises Climate Mosaic workshops. The Climate Mosaic is an interactive workshop based on the best available scientific knowledge, incorporating trend analysis and designed to explain the causes and mechanisms of global warming using UN climate reports (IPCC reports). In 2025, 50 employees took part in the workshops, and 18 completed the training required to become certified facilitators.

The Bank also conducted training and consultation sessions for Advisors to ensure the highest quality of service in the area of sustainable financial products. Advisors participate in internal and external training programmes, including the ESG Development Academy for Business Advisors and the ESG Business Inspirations webinar series, which presents case studies of green transactions.

The Bank organised a series of workshops entitled “Strategically on Decarbonisation in the Food Sector for Risk” and Business teams. These workshops were aimed at Advisors and Analysts working with business Customers across all segments, from sole-proprietor farmers to large corporate groups, as well as anyone interested in deepening their knowledge of decarbonisation in the food sector.

The ability to carry out the activities described in this 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 loan portfolio.

The Bank’s capital expenditure in 2025 for the implementation of climate change mitigation and adaptation measures amounted to PLN 866,9 thousand and included, among other things, the installation of photovoltaic equipment, BMS and reactive power compensators. The Bank’s total capital expenditure in 2025 amounted to PLN 442,242 thousand. Operating expenses for climate change mitigation and adaptation amounted to PLN 38,890 thousand and included, among other things, the maintenance and review of the installations, the purchase of green energy and guarantees of origin and certificates of origin, and the lease of hybrid and electric cars. The Bank’s total operating costs amounted to PLN 3,240,933 thousand. Details are described in the [General administrative expenses, depreciation and amortisation](#).

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 2025, the value of sustainable financing provided by the Bank amounted to PLN 13.6 billion (compared to PLN 10.2 billion in 2024), including PLN 8.8 billion of financing for environmental objectives. The strategic goal is 10% sustainable financing and is described in detail in the section Implementation of the strategy: [Pillar POSITIVE](#). The Bank has not defined targets for its loan portfolios and financed greenhouse gas emissions (Scope 3, Category 15. Investments).

Targets and metrics related to the Group’s own operations

Approach and metrics

Sustainability measures are an integral part of the Bank’s GObeyond strategy 2022-2025, which includes commitments to develop sustainable products, their sales volumes, as well as to reduce greenhouse gas emissions (Scope 1, 2 and 3 – business travel).

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 2025.

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.

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 and energy consumption. The targets include all companies in the Group. The GObeyond Strategy for 2022-2025 did not rely on climate scenarios.

In Scopes 1 and 2 as well as Scope 3 (business travel), the Bank set the goal of reducing greenhouse gas emissions by 55% and reducing energy consumption by 35% by 2025 in the GObeyond strategy. The reduction of greenhouse gas emissions includes CO₂e. In 2024, both strategic goals defined in the GObeyond strategy were achieved. This is the result of the factors described in the section [The Group’s activities on climate-related opportunities](#), which include:

- changes in the Group’s vehicle fleet, consisting of a consistent increase in the share of electric and low-emission cars and the phase-out of diesel vehicles
- actions aimed at reducing building emissions, such as replacing standard lighting with LED, optimising equipment, upgrading air-conditioning units to more efficient models, implementing pilot programmes for heat pumps and building-management systems (BMS), modernising IT equipment at the headquarters

These results were also influenced by the continued use of the hybrid work model, the implementation of ISO 14001 and ISO 50001 environmental certifications, and efforts to build awareness and promote good practices among employees.



Table 85. Achievement of GObeyond strategic target to reduce CO₂ emissions (2022-2025)

Target 2025	Emission volume (tonnes CO ₂ e)		
	base year 2019	2025	2025 vs 2019
Reduction of CO ₂ emissions from operations – 55%	20,149	7,860	-61%

Table 86. Achievement of GObeyond strategic target for energy consumption (2022-2025)

Target 2025	Energy consumption (GJ)		
	base year 2019	2025	2025 vs 2019
Reduction of energy consumption – 35%	153,389	76,424	-50%

Decarbonisation levers used to reduce greenhouse gas emissions in own operations are described in the section [Actions and resources in relation to climate change policies \(E1-3\)](#). The key decarbonisation lever resulting in the reduction of greenhouse gas emissions in Scope 1 is the use of an alternative drive fleet: transition to electric and hybrid cars reduces Scope 1 emissions by approximately 50%. In Scope 2, it is electricity from renewable sources, which reduces greenhouse gas emissions by an estimated 60%.

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 table below also presents the consumption of other types of energy.

The Group’s energy consumption and energy mix can be broken down as follows:

Table 87. Information on energy consumption and energy mix in the Group

Energy consumption and energy mix	2025	2024
1) Fuel consumption from coal and coal products (MWh)	0	0
2) Fuel consumption from crude oil and petroleum products (MWh)	13,884	15,535
3) Fuel consumption from natural gas (MWh)	3,420	3,563
4) Fuel consumption from other fossil sources (MWh)	0	0
5) Consumption of purchased or procured electricity, heat, steam and cooling from fossil sources (MWh)	8,751	8,397
6) Total consumption of energy from fossil sources (MWh) (calculated as the sum of lines 1-5)	26,054	27,495
Share of fossil sources in total energy consumption (%)	67%	71%
7) Energy consumption from nuclear sources (MWh)	–	–
Share of energy consumption from nuclear sources in total energy consumption (%)	–	–

Energy consumption and energy mix	2025	2024
8) Fuel consumption of renewable sources, including biomass (also including industrial and municipal bio-waste, biogas, renewable hydrogen, etc.) (MWh)	0	0
9) Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources (MWh)	12,478	11,228
10) Consumption of self-generated renewable energy without fuel (MWh)	226	214
11) Total renewable and low-carbon energy consumption (MWh) (calculated as the sum of lines 8-10)	12,704	11,442
Share of renewables in total energy consumption (%)	33%	29%
Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)	38,758	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 7,860 tCO₂e (market-based).

Direct emissions from fossil fuel combustion in Scope 1 amounted to 4,201 tCO₂e, while in Scope 2 we recorded 3,116 tCO₂e of indirect emissions from energy consumption market-based. In Scope 3, business travel emissions amount to 543 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, and emissions from the leakage of refrigerants, e.g. from air conditioning systems. The Scope 2 carbon footprint 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 389 locations. The estimation includes the use of electricity, gas and central heating. In 2025, we used 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 certified by Respect Energy as well as certificates covering energy which is not directly supplied by Respect Energy that confirm that it is renewable



energy. Consequently, all greenhouse gas emissions resulting from electricity consumption in Scope 1 and 2 are considered zero-emissions according to the market-based method.

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 the value chain.

Scope 3 emissions

As of 31 December 2025, the estimated financed GHG emissions (category 15) are 2,295,129 tCO₂e.

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 53 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, 2 and 3 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 makes calculations using average emission factors determined for regions and sectors according to the PCAF standard. For the oil, gas and car sectors, the Group presents all three Scopes of Customer emissions. For the other sectors, Scope 3 Customer GHG emissions are not included in the emission calculations 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 Customers 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 for the other sectors.

In 2025, the Group introduced a change in the data sources used to estimate financed emissions for the food production sector, ensuring that the calculation is based not only on the Customer industry classification but also on the volume of specific agricultural products they produce. As a result, for such Customers, Scope 1 and 2 emissions are calculated using emission-intensity indicators derived from external agricultural market databases, including FADN, FAO, the Agro-food Data Portal and Eurostat. These sources make it possible to estimate the size of farms based on their plant and animal production volumes and to assign emission intensities appropriate to the goods produced. This change resulted in a more accurate reflection of the Bank’s emissions associated with financing the agricultural sector and led to a reduction of 2 million tonnes of CO₂ equivalent. To ensure comparability, the 2024 data were also recalculated retrospectively using the new methodology.

As of 31 December 2025, approximately 20% of emissions in the portfolio of financed non-financial corporate emissions are reported by Customers. Accordingly, the calculation of 80% of issues is based on sector and geographic averages. However, the Group is taking steps to increase the share of data obtained directly from Customers through, for example, its collaboration with Envirly and by providing Customers with ESG questionnaires required in the credit process to collect such data directly from Customers.

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 treasury bonds and development bank bonds (with a total value of PLN 57 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 bonds is based on averaged data for the entire economy; the average emission intensity of this portfolio according to the PCAF standard is 56 tCO₂e/million PLN;
- mortgages (PLN 23 billion) and car loans (PLN 5 billion) – the data collected on building energy certificates is currently insufficient (despite the broader range of available certificates made possible by the use of data from the central register of building energy performance), 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 from mortgages and car loans has no material impact on total financed emissions.

Off-balance sheet items are not included in the calculation. Other Scope 3 categories are not calculated by the Group due to their non-materiality.

Table 88. Methodology for calculating Scope 3 greenhouse gas emissions in the Group

Source of Scope 3 emissions	Methodology for calculating Scope 3 emissions
6 Business travel	The emission factors needed to calculate emissions are derived from the DEFRA standard.
15 Investments	The reporting of 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. Scope 3 Category 15 emissions account for nearly 100% of total emissions.



Table 89. Total gross Scope 1, 2 and 3 greenhouse gas emissions in the Group in tCO₂e

	2025	2024
Scope 1 greenhouse gas emissions		
Gross Scope 1 greenhouse gas emissions (tonnes of carbon dioxide equivalent)	4,201	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)	10,008	10,986
Gross Scope 2 greenhouse gas emissions under the market-based approach (tonnes of carbon dioxide equivalent)	3,116	2,991
Significant Scope 3 greenhouse gas emissions		
Total gross indirect Scope 3 greenhouse gas emissions (tonnes of carbon dioxide equivalent)	2,295,672	2,280,768
6 Business Travel	543	567
15 Investments ^{1,2}	2,295,129	2,054,667 ³
Total greenhouse gas emissions		
Total greenhouse gas emissions (location-based) (tonnes of carbon dioxide equivalent)	2,309,881	2,070,943
Total greenhouse gas emissions (market-based) (tonnes of carbon dioxide equivalent)	2,302,989	2,062,948

¹ As more described above in detail, the value does not take into account sovereign bond issues and Scope 3 Customers.
² Category 15 of Scope 3 includes lease receivables.
³ The value of investments has been recalculated retrospectively to reflect the changes introduced in 2025 to the methodology for calculating financed emissions, as described in the section *Scope 3 emissions*. These changes include the incorporation of Scope 3 emissions for the oil, gas and automotive sectors, as well as the change in emission-factor sources for the agricultural sector. The 2024 figures also include improvements in the quality of data received from Customers regarding their own emissions measurements for that period, which were not yet available at the time of last year's report. The retrospective recalculation ensures year-on-year comparability of the data. In line with last year's calculations, emissions from investments amounted to 4,701,774 tCO₂e.

The Group is not aware of any material 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 income metric for financial institutions, the Group publishes the GHG intensity (financed emissions) per unit of financed assets, equal to 44 tCO₂e/PLN mln. The GHG intensity ratio for 2025 calculated in accordance with the requirements of ESRS E1-6, relating total GHG emissions to net income published in the [Financial results](#) section of this report, location-based and market-based, is 0.18 tCO₂e/thousand PLN. Net income of PLN 12,776,988 thousand represents the sum of the following items: interest income, fee and commission income, dividend income, net trading income (including result on currency exchange), result on investment activities, result on hedge accounting, and other operating income.

The greenhouse gas emission intensity indicator for 2024, calculated using both the location-based and market-based approaches, amounted to 0.16 tCO₂e per thousand PLN. This is a corrected figure that reflects the updated methodology for calculating financed emissions and therefore differs from the value reported in the 2024 statement. Net revenue for 2024 amounted to PLN 12,896,755 thousand. The Bank’s own greenhouse gas emission intensity indicator per unit of financed assets in 2024, based on the adjusted GHG emission values, amounted to 42 tCO₂e per million PLN.

Table 90. BNP Paribas Group greenhouse gas emission intensity

Greenhouse gas emission intensity per net revenue	2025	2024 ¹
Greenhouse gas emission intensity (financed emissions) per unit of financed assets (tCO ₂ e/PLN million)	56	42
Total greenhouse gas emissions (location-based) per net revenue (tCO ₂ e/PLN'000)	0.18	0.16
Total greenhouse gas emissions (market-based) per net revenue (tCO ₂ e/PLN'000)	0.18	0.16

¹ Adjusted for change in the methodology for calculating financed emissions.

GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

The Group does not purchase carbon credits.

Internal carbon pricing (E1-8)

The Group does not use internal carbon pricing systems.

Taxonomy disclosures

Regulatory framework and reporting obligations for financial institutions

The EU Taxonomy (Taxonomy) is a system for classifying sustainable 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 January 2026.

In July 2025, the European Commission adopted a proposal to simplify the application of the EU Taxonomy. In the disclosure presented below, the Bank applied the new approach in line with the provisions of Commission Implementing Regulation (EU) 2026/73 of 4 July 2025 (“Regulation (EU) 2026/73”). As the new indicators include, among other changes, a different denominator scope, the disclosures presented below are not comparable with those published for 2024.

The Taxonomy is based on two central concepts:

- 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;



- 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 and that meets the minimum safeguards.

The main alignment indicator for credit institutions is the Green Asset Ratio (GAR), which concerns financing instruments (loans and advances, debt securities, equity instruments) on the institution’s balance sheet. Additional performance indicators include: the Green Asset Ratio (flow), the assets under management ratio, and the financial guarantees ratio. The Bank made use of the option to omit reporting on the financial guarantees’ ratio, as provided for in Regulation 2026/73, given that net income from guarantees accounts for less than 10% of the Bank’s total net income (net banking income).

Scope of financial assets subject to alignment 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 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 (loans and advances, debt securities, equity instruments, enforced collateral):

- outstandings on European financial and non-financial companies subject to the CSRD in 2025⁷ and subject to the obligation to disclose sustainability information under the amended Accounting Act;
- 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).

In accordance with Commission Delegated Regulation (EU) 2026/73 of 4 July 2025, the denominator of the GAR now includes the financial assets listed above, as well as other exposures to households. It should be noted that in the previous year the denominator also included other assets that were not subject to a Taxonomy-eligibility and alignment assessment.

As at 31 December 2025, the denominator includes approximately 50% of assets eligible under the Taxonomy, i.e., assets that potentially meet the alignment criteria and may therefore be included in the numerator. Taxonomy-eligible assets consist primarily of mortgage loans granted to households (approximately 70% of Taxonomy-eligible assets). The remaining assets include exposures to financial and non-financial corporates (approximately 14% of Taxonomy-eligible assets), as well as vehicle loans and building renovation loans (approximately 17% of eligible assets). In practice, these latter categories of household loans cannot be included by banks in the numerator due to the lack of available data. The remaining portion of the denominator (approximately 50%) corresponds to assets that do not meet the Taxonomy

requirements and are therefore inherently excluded from the numerator. Approximately 70% of these assets are exposures to households, with the remaining 30% representing exposures to corporates.

The GAR, which is measured on a stock basis, is complemented by a flow-based metric. This indicator reflects the share of new Taxonomy-aligned on-balance-sheet exposures granted during the financial year and active at the reporting date, relative to the total value of on-balance-sheet exposures included in the denominator granted during the financial year and active as at 31 December 2025.

Additional key performance indicators

Concerning the green ratio of assets under management, the scope covers instruments invested in EU companies subject in 2025 to the CSRD in the Group’s management of Customer assets, i.e. the assets of the portfolio management service of the Brokerage Office of the Bank and investment funds managed by BNP Paribas TFI. Other funds – i.e., those not managed by BNP Paribas TFI – were not included in the green managed assets indicator in 2025.

The Green Assets Under Management flow indicator for the 2025 reporting year is calculated as the difference between the value of assets under management at the end of 2025 and their value at the end of the previous year.

Methodology for assessing alignment with the EU Taxonomy

The approach to analysing the eligibility and alignment of financial assets with the Taxonomy varies depending on the type of entity.

For companies subject to the NFRD, if the financing instruments are with unknown use of proceeds, the Group uses the data received from and published by counterparties, such as the aligned turnover ratio and the aligned capital expenditure ratio (CapEx). This treatment applies to the Green Asset Ratio (GAR) and the green ratio for assets under management.

In case of known use of proceeds, 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 financial 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 is not fully achievable. This is why no financial instrument with known use of proceeds has been reported in the GAR numerator, whether with respect to companies or local governments.

For financing granted to households, financial institutions must also collect evidence confirming compliance with all technical screening criteria in order to assess Taxonomy alignment. The Group is able to perform such a comprehensive assessment only for mortgage loans. Compliance with the substantial contribution criteria for financed residential properties is verified based on the primary energy demand indicator (“EP”) included in energy performance certificates. These data are obtained directly from Customers during the credit process or from the Central Register of Energy

⁷ Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 on corporate sustainability reporting (CSRD)



Performance Certificates maintained by the Ministry of Development and Technology. We classify exposures financing the purchase or construction of properties as meeting the substantial contribution criteria if their EP indicator does not exceed:

- for properties built before 31 December 2020:
 - 81.86 kWh/m²/year for multi-family buildings;
 - 83.91 kWh/m²/year for single-family houses;
- for properties built after 1 January 2021:
 - 58.5 kWh/m²/year for multi-family buildings;
 - 63 kWh/m²/year for single-family houses.

The DNSH (“do no significant harm”) criteria were verified based on the Bank’s internal process for assessing physical climate risk. As a precautionary measure, the Bank classified as Taxonomy-aligned only those exposures that are located in areas not exposed or with low exposure to physical risks. The significant increase in Taxonomy-aligned housing loans compared with the previous year results from improved data quality and availability, including the use of the ministerial energy performance register, as well as from moving away from an overly restrictive interpretation of the EP indicator.⁸

At this stage, the Group does not collect evidence confirming compliance with all technical criteria for household renovation loans or car loans. Consequently, the numerator of the indicator includes only household mortgage loans.

Key indicators

Table 91. Summary of key performance indicators to be disclosed by credit institutions in accordance with Article 8 of the Taxonomy Regulation

31.12.2025		Total exposure to Taxonomy-aligned activities (PLN'000)		KPI(1) (%)	KPI(2) (%)	% coverage (over total assets)(3)	Exposures not covered (% of assets covered by the KPI)(4) (%)	Exposures not covered (% of assets covered by the KPI)(4) (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
Main KPI	Green Asset Ratio (GAR) stock	1,471,865	2,023,346	2.58%	3.55%	31.12%	0.00%	0.00%
Additional KPIs (5)	GAR (flow)	562,834	541,068	4.30%	4.13%	32.68%	0.00%	0.00%
	Financial guarantees (6)	n/a	n/a	n/a	n/a			
	Assets under management	39,033	66,953	0.63%	1.07%			

(1) Fee and commission income other than from lending and asset management services. (2) Based on the Turnover KPI of the counterparty. (3) Based on the CapEx KPI of the counterparty. (4) % of assets covered by the KPI over the Bank's total assets. (5) KPIs of fee and commission income and the trading book apply only from 2028. (6) The Bank made use of the option to omit reporting on the financial guarantees ratio, as provided for in Regulation 2026/73, given that net income from guarantees accounts for less than 10% of the Bank's total net income.

⁸ In the 2024 disclosure, meeting the substantial contribution criteria was possible only for properties whose EP did not exceed 58 kWh/m²/year.



31.12.2024		Total exposure to Taxonomy-aligned activities (PLN'000)		KPI(1) (%)	KPI(2) (%)	% coverage (over total assets)(3) (%)	Exposures not covered (% of assets covered by the KPI)(4) (%)	Exposures not covered (% of assets covered by the KPI)(4) (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
Main KPI	Green Asset Ratio (GAR) stock	562,704	889,167	0.50%	0.80%	65.90%	41.50%	34.10%
Additional KPIs (5)	GAR (flow)	50,240	106,768	0.30%	0.20%	32.68%	0.00%	0.00%
	Financial guarantees	90	1,049	0.006	0.07			
	Assets under management	112,646	65,852	1.40%	0.80%			

(1) Fee and commission income other than from lending and asset management services. (2) Based on the Turnover KPI of the counterparty. (3) Based on the CapEx KPI of the counterparty. (4) % of assets covered by the KPI over the Bank's total assets. (5) KPIs of fee and commission income and the trading book apply only from 2028.

The Group’s Green Asset Ratio (GAR) based on turnover of Customers amounted to 2.6% of assets covered by the KPI as at 31 December 2025. The GAR based on capital expenditure amounted to 3.6%.

Due to the change in the GAR calculation applied in 2025, including the exclusion from the denominator of assets that are not subject to eligibility and alignment assessment under the Taxonomy (i.e. the new approach in line with the provisions of Regulation 2026/73), the 2025 KPIs are not comparable with those for 2024, which amounted to 0.5% for the turnover-based Green Asset Ratio and 0.8% for the capex-based Green Asset Ratio.

In addition, the increase in the GAR in 2025 was driven by a higher value of Taxonomy-aligned mortgage loans compared with 2024, resulting from improved data quality and availability, including the use of the national register of building energy performance certificates, as well as the shift away from an overly restrictive assessment of the EP.

The remaining tables required under Annex VI to Regulation 2026/73 are presented in Appendix 2. The Group’s full Taxonomy disclosure for 2024 is available in the Management Board Report on the Activities of the BNP Paribas Bank Polska S.A. Group for 2024, published on the [Bank’s investor relations website](#).

.



Own workforce (ESRS S1)

BNP Paribas Bak Polska S.A. (the Bank) recognises that engaged and satisfied employees are a key factor in ensuring a high level of customer satisfaction. The Bank strives to create a work environment that supports the development of employee competences, initiative and creativity, and that enables the testing of new solutions, including undertaking activities that carry a risk of error.

To this end, the Bank promotes organisational values that include empowerment, collaboration, courage, simplicity and transparency. Applying these values in everyday work strengthens the organisation’s ability to respond to changing market conditions and contributes to the achievement of the Bank’s strategic objectives.

The Bank, together with its subsidiaries, forms the BNP Paribas Bank Polska Group (the Group), which is ranked sixth in the Polish banking sector by total assets. The Group’s headcount expressed in active FTEs is 7.3 thousand.

Policies

To mitigate negative impact and risks, but also strengthen important opportunities, the Group has internal 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 Rules, and the Employee Remuneration Policy. Descriptions of the policies are presented in Table 93 below.

Actions

The Group describes the actions to support the material positive impacts, mitigate negative impacts and risks and strengthen opportunities associated with the Group’s employees. These include the promotion of an inclusive organisational culture, prevention of unequal treatment, discrimination, harassment and violence in the workplace, ensuring social protection, prevention of psychosocial risks, measures for professional equality, social integration, and development of competences.

Metrics and targets

The Bank is pursuing the goals that were implemented as commitments within the GObeyond strategy running from 2022. In 2024, we started to prepare the business strategy for the next period and announced the Accelerate 2030 strategy for 2026-2030 in December 2025. The indicators presented in this chapter correspond to the Group’s employment data, as well as all data relating to the working conditions of the Group’s employees (employment conditions, fair pay, social dialogue, social protection, work-life balance, occupational 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 the Group’s strategy and business model. As a responsible employer, we ensure that the rights of employees are respected, including those employed under an employment agreement 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 material negative impacts that may affect its employees, as well as risks and opportunities related to own workforce.

To achieve the strategic goals and objectives, a high level of alignment 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. The HR Area’s operating model, based on cooperation with HR Business Partners, is aligned and integrated with the Bank’s business mode, enabling close collaboration with organisational units and business partners.

Attracting and retaining highly skilled employees, and effectively leveraging their capabilities, is a key factor in building the Bank’s competitive advantage. Competent and proactive human capital management supports value creation for stakeholders and enables the Bank to seize emerging market opportunities.

This is why the role of the Human Resources is to support managers in managing human potential and to continue to build the Bank’s image as a good employer. For more information, see the section [Interests and views of stakeholders \(SBM-2\)](#).

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 material impacts and risks related to its own workforce (see also Table 92).

The Bank, as a responsible employer, attaches great importance to the development of its employees, including those employed in a form other than an employment agreement, and to provide them with a motivating working environment in which everyone is treated with respect, dignity and on an equal basis. Violations result 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 range of situations, e.g. aggression, violence at work, sexual harassment, discrimination, etc.

Risks of the Bank’s liability may also arise if it fails to protect the health and safety of its employees. It is therefore important to identify violations at the earliest possible stage and to take appropriate action to prevent them. Behaviour or actions towards others 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.



Unwanted behaviour, regardless of its form, must not be tolerated as it contributes to the deterioration of the working conditions of 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.

The DMA process took into account information from internal and external stakeholders, including employees, NGOs, Customers and investors. Material topics reported by stakeholders mainly concerned diversity and the need to build an open organisational culture based on flexibility and development of skills. For more on stakeholder dialogue, see section [Interests and views of stakeholders \(SBM-2\)](#).

The risk assessment was also based on an internal analysis of risks in the Risk ID tool related to employment, as 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 labour or child labour.

Impacts identified by the Group

The material impacts include:

- **Creating a friendly working environment, inclusion and diversity** – Supporting actions aimed at preventing discrimination and promoting an environment based on respect and equality. Activities focused on systematically improving working conditions and strengthening employee well-being.
- **Providing employees with development opportunities through access to training and upskilling programmes** – Strengthening social capital, employee competences and their position in the labour market through a broad range of training. Providing employees with opportunities for professional development and supporting them in preparing for future challenges.
- **Discrimination, violence and mobbing at the workplace** – Occasional cases of discrimination, harassment and violence at the workplace.

Material risks identified by the Group

Based on the analysis of risk indicators conducted periodically in the BNP Paribas Group, material risks to the financial results were identified:

- **Psychosocial risks:** recent changes in working methods, warfare 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.
- **HR legal risks:** the risk of HR processes failing to comply with applicable labour law regulations and with standards of equal treatment and non-discrimination, which may lead to legal liability, employee disputes, and a negative impact on the organisation’s reputation.

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 managing bodies and senior management, as well as work-life balance initiatives: the Two Hours for Family/Human, Two Hours for Health, Good Kilometres 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.
- **Skill development opportunities:** training and development programmes help to retain employees and support internal mobility. Learning and development of new skills, promoting employee satisfaction and loyalty, helps to reduce external recruitment costs for the Group. Our programmes enable the strengthening of employees’ skills in line with future needs. In 2025, 89 topics were delivered in more than 240 sessions as part of the #MyWay training initiative. They were attended by over 5,000 participants. This initiative includes an internal programme where 32 topics in 120 sessions were delivered and 1,600 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, it was not possible to quantify financially the opportunities listed above and therefore they were not considered as material opportunities in the double materiality assessment process (see Table below).



Table 92. 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
Positive impacts	Creating a friendly working environment, inclusion and diversity	• BNP Paribas Group Code of Conduct, • BNP Paribas agreement on fundamental rights and global social framework, • BNP Paribas Bank Polska S.A. Diversity Management Policy • Employee Remuneration Policy	Diversity and inclusion initiatives, Programme Dobrze	• Diversity metrics • Work-life balance metrics • Number of persons with disabilities in employment • Incidents, complaints and severe human rights impacts	• Share of women in the Bank’s Management Board > 30% (as of January 2026 – 42.9%)
	Providing employees with development opportunities through access to training and upskilling programmes	• Rules of training and development for employees of BNP Paribas Bank Polska S.A. • Onboarding policy of BNP Paribas Bank Polska S.A.	Development offer of the central programme #MyWay, language courses, academies, re- and upskilling, university programme fee refunds	• Training and skills development metrics	• eNPS [vs. 2021] -9 » 20 (2025) (employee Net Promoter Score)
Negative impacts	Discrimination, violence and mobbing at the work place	• BNP Paribas Group Code of Conduct • BNP Paribas agreement on fundamental rights and global social framework • Policy of dealing with violations of respect for others • BNP Paribas Bank Polska S.A. Diversity Management Policy • Employee Remuneration Policy • Complaints and proposals on employee affairs – instructions • Whistleblowing Policy • Anti-fraud Policy	Diversity and inclusion initiatives Whistleblowing channels – reporting discrimination, violence and mobbing Corrective actions (disciplinary and support measures, follow-up)	• Characteristics of employees • Collective bargaining coverage and social dialogue • Diversity metrics • Adequate wages • Number of persons with disabilities in employment • Training and skills development metrics • Work-life balance metrics • Remuneration metrics • Incidents, complaints and severe human rights impacts • Health and safety metrics	• Eliminate sporadic incidents of discrimination at work • eNPS [vs. 2021] -9 » 20 (2025)
Risks	Psychosocial risk	• BNP Paribas agreement on fundamental rights and global social framework	Programme Dobrze, Occupational Health and Safety, whistleblowing system	• Characteristics of employees • Health and safety metrics	• eNPS [vs. 2021] -9 » 20 (2025)
	HR legal risk	• BNP Paribas Group Code of Conduct, • BNP Paribas 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 records RiskCare, KRI key risk indicators, management training	• Characteristics of employees • Incidents, complaints and severe human rights impacts	• eNPS [vs. 2021] -9 » 20 (2025) • Monitoring the number of reports on violations of respect for others and the number of sanctions



Managing impacts, risks and opportunities

Policies related to own workforce (S1-1)

The Group places particular importance on respecting human rights, ensuring safe and healthy working conditions, and promoting diversity, equality and inclusion. Building a competitive advantage through the creation of diverse teams based on collaboration, dialogue and knowledge sharing is a key element of the #TOGETHER strategic pillar. By fostering an

inclusive and safe working environment, we aim to strengthen employee well-being, prevent all forms of unequal treatment and discrimination, and minimise risks related to health and safety.

The table below presents a summary of the key policies addressing the Group’s employees.

Table 93. 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.	Group	Supervisory Board of the Bank	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	Management Board of the Bank	Internal document available to employee on the intranet, internal training
Policy on dealing with violations 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 violations 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 ensuring the impartiality of the persons carrying out these actions and the absence of conflicts of interest.	Group	Management Board of the Bank	Internal document available to employee on the intranet
Whistleblowing Policy in BNP Paribas Bank Polska S.A.	The regulation provides a procedure for the Bank’s internal reporting and aims to set out the principles, methods of reporting of reasonable suspicions, without fear of retaliation following a breach notification. The whistleblower is guaranteed that the alert will be treated with seriously, fairly and with full protection of personal data, including data 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	Management Board of the Bank	Internal document available to employee on the intranet
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 therein: professional equality between women and men regardless of gender; multiculturalism, diversity of origin; disability; age and intergenerational diversity, sexual orientation and gender identity. The Policy defines the role of employee networks.	Bank	HR Executive Director	Internal document available to employee on the intranet
Contractor management policy in BNP Paribas Bank Polska S.A.	The Policy describes the terms of cooperation with contractors to the extent necessary to conduct the Bank’s business and describes the risks of cooperation with contractors and how to mitigate them.	Bank	Management Board of the Bank	Internal document available to employee on the intranet
Rules for training and development of employees of BNP Paribas Bank Polska S.A.	The Rules describe the objective and procedure for planning and implementing development initiatives to improve employees’ competences and for drafting of Individual Development Plans. A process for Contractors is also described.	Bank	HR Executive Director	Internal document available to employee on the intranet



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
Onboarding policy in BNP Paribas Bank Polska S.A.	The onboarding policy describes the rules, functions and stages of employee onboarding.	Bank	HR Executive Director	Internal document available to employee on the intranet
Employee recruitment policy in BNP Paribas Bank Polska S.A.	The 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 available to employee on the intranet
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: - 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. 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.	Bank	Management Board of the Bank	Internal document available to employee on the intranet
Remuneration policy for Employees of BNP Paribas Bank Polska S.A.	It ensures and defines transparent and uniform remuneration principles according to which employees remuneration is awarded and paid. In 2025, the document was aligned with the principles implemented in the new Collective Bargaining Agreement, in particular as concerns base salary (new job categories and salary grades).	Bank	Supervisory Board of the Bank	Internal document distributed internally and communicated externally in the annual report published on the Bank's website
Remuneration policy for persons with a significant impact on the risk profile of BNP Paribas Bank Polska S.A.	In particular, it concerns: - the principles for the identification of persons in the Bank and in the Bank's subsidiaries who have a significant impact on the risk profile and the principles of covering the Group's employees by 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 significant impact on the risk profile and its payment.	Group	Supervisory Board of the Bank	Internal document

*All employees are required to comply with the provisions of the policies.

Human rights

Social engagement

The Group:

- is committed to promoting respect for human rights across its entire sphere of influence and to treating all employees with dignity; the Group maintains a strict prohibition on forced labour;
- specifically adheres to the ten principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, international human rights standards (as defined in the International Bill of Human Rights), and the fundamental labour standards (as defined by the International Labour Organization);

- applies the most rigorous ethical and compliance standards, including anti-corruption, human rights protection and environmental responsibility, regardless of the nature of its activities, drawing on the Code of Conduct and the BNP Paribas agreement on fundamental rights and global social framework.

Given that the Group's employees are predominantly highly qualified specialists working in the services sector, the risk of modern forms of slavery and human trafficking has been assessed as very low. BNP Paribas, through the BNP Paribas Group Code of Conduct, is committed to ensuring a motivating work environment in which all employees are treated fairly and with respect, with particular emphasis on safeguarding employee dignity, upholding the highest standards of professional ethics and rejecting all forms of discrimination.



Furthermore, with regard to associates, the Group requires that suppliers employing such workers comply with the BNP Paribas Sustainable Procurement Charter, which is based on the principles of the Universal Declaration of Human Rights (UN, 1948) and the Fundamental Conventions of the International Labour Organization (ILO). The system ensuring compliance with the Charter is described in the Group’s due diligence plan.

Last but not least, the Group provides employees with a whistleblowing system, including reporting channels and a mechanism for raising concerns, available both to Group employees and to persons providing work under other forms of engagement. More information is provided in the section: [Processes to remediate negative impacts and channels for own workforce to raise concerns \(S1-3\)](#).

Occupational health and safety

In line with the BNP Paribas Group’s Code of Conduct, workplace safety (including during business travel) requires the engagement of all employees in safety and protection efforts, as well as compliance with the Group’s internal policies. For managers, this also includes striving to improve working conditions for their teams and reporting any actions that may pose a risk to the physical safety of employees or external persons present on Group premises.

Employees of the Group and all persons present on its premises (interns, trainees, associates, subcontractors, Customers, guests, etc.) are covered by a unified set of rules regarding personal safety and the protection of property. This framework defines the fundamental principles relating to:

- **security** – risks associated with intentional or malicious acts that may harm individuals, assets or the Group’s operations;
- **safety** – risks arising from natural, climatic or technological events affecting Group locations, which may impact individuals, assets or operations;
- **business continuity and crisis management**.

The functions responsible for safety and security form the foundation of a system designed to protect the Group’s operations, resources and interests from safety and security incidents, based on continuous risk assessment.

Given the nature of the Group’s activities and the measures in place, the actual risks related to employee health and safety are relatively low, and the number of workplace accidents remains very limited. The main health risks that may arise from potential incidents relate to psychosocial factors and the effects of sedentary work. As a result, the Group has identified mental health and issues linked to low physical activity as priority health areas under the Global Agreement and the Group’s “Dobrze” health programme.

To ensure safe and comfortable working conditions, the Group fully complies with occupational health and safety regulations (including, for example, rules on providing employees with corrective glasses or contact lenses for screen work). The Group provides an ergonomic work environment and supports work-life balance. Mandatory initial and periodic training on occupational health and safety is provided, and an e-learning course on workplace ergonomics is available to all interested employees on the MyLearning training platform. These trainings aim, among other objectives, to prevent musculoskeletal disorders and injuries.

The Group’s office spaces are equipped with facilities for employees, including persons with disabilities, as well as relaxation areas and modern spaces that support teamwork. For employees with disabilities, assessments are carried out to evaluate the adaptation of the work environment to their individual needs, enabling the implementation of appropriate solutions.

The Bank has regularly organised first aid training for willing employees since 2022. To date, a total of more than 1,500 employees have been trained, with 189 employees in 2025. Another 20 employees of the Bank annually participate in a Qualified First Aid refresher course.

Accidents

All workplace accidents are recorded in the accident register and in the RiskCare system. After each incident, an accident report is prepared, containing conclusions and preventive recommendations. In addition, once a year the Occupational Health and Safety Committee conducts a comprehensive analysis of accidents within the Group and, based on its findings, implements actions aimed at raising awareness of workplace safety.

Occupational Health and Safety Days were organised in 2025, focusing on safety of employees who use a car for work, reminding employees of the key principles of workstation ergonomics, informing them about changes to the reimbursement rules for purchasing corrective glasses for screen work, and promoting safe sports activity. As part of Health Days, employees were reminded how to respond in the event of sudden cardiac arrest and how to ensure cardiovascular prevention, and those interested could register for first aid training.

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.

Diversity, equality and inclusion

The Bank promotes a work environment based on respect for diversity and the full utilisation of employees’ potential to support the organisation’s development. A key principle is mutual respect, understood as adherence to the highest standards in professional relationships, the rejection of all forms of unequal treatment and discrimination, and the provision of a safe workplace where everyone can develop their skills and talents.

The foundation of an inclusive organisational culture relies on the values mentioned above, including transparency, courage and collaboration. These values serve as a practical point of reference in both strategic and operational decision-making. An additional tool supporting adherence to ethical and responsible business conduct is the BNP Paribas Group Code of Conduct.

The Diversity Management Policy at BNP Paribas Bank Polska S.A. sets out the principles for identifying and mitigating the risk of discrimination, and for promoting respect for diversity in the workplace. The Policy incorporates the BNP Paribas Group guidelines set out in “Diversity, Equity and Inclusion Governance at BNP Paribas” and refers to the strategic DEI (diversity, equity & inclusion) pillars defined therein:



- professional equality between women and men,
- sexual orientation and gender identity,
- diversity of origin and multiculturalism,
- disability,
- age and intergenerational diversity.

Managing diversity and inclusion is one of the key elements in building an inspiring and development-oriented work environment. For over a decade, the Bank has been a signatory of the Diversity Charter, an international initiative under the patronage of the European Commission, committing organisations to counteracting discrimination and actively promoting diversity. The Bank has also signed the BNP Paribas Agreement on Fundamental Rights and Global Social Framework, along with the ILO Global Business and Disability Network Charter, confirming its commitment to respecting human rights in business and to promoting diversity, gender equality, health protection and quality of life at work.

Oversight of compliance with diversity principles and coordination of activities in this area are carried out by a dedicated person responsible for diversity and inclusion management, as well as by two Diversity Officers in the Bank’s structures. Our diversity initiatives are subject to external evaluation. In 2025, for the seventh consecutive year, we were recognised among the leaders (score above 80%) in diversity management in the Diversity In Check survey (formerly D&I Rating) conducted by the Responsible Business Forum.

The Bank consistently promotes respect for diversity and an inclusive organisational culture, applying this approach both to current employees and to candidates, in line with the Employee Recruitment Policy at BNP Paribas Bank Polska S.A. and the standards applied in the onboarding process. The Bank actively supports employee-driven initiatives that promote gender equality, equal parental rights, intergenerational dialogue, the inclusion of people aged 50+, persons with disabilities, neurodivergent persons and the LGBT+ community. Regular activities are carried out to prevent unequal treatment and discrimination and to promote DEI standards in the workplace. One of the key tools in this area is the Equal Treatment Decalogue – “Notice differences, do not discriminate” – developed on the basis of the equal treatment perception survey and serving as a set of principles aimed at counteracting discrimination, microaggressions and exclusion. The Bank also organises recurring events that strengthen awareness and competences in the area of DEI, such as Diversity Days, Health Days, “Health Starts in the Mind”, Parenting Days, Pride Month and Neuro-April.

Commitment to fair and equal treatment in HR processes

The Bank considers its employees a key factor in the organisation’s success. A professional approach to recruitment, based on clearly defined criteria, enables the Bank to attract people with the competences necessary to achieve strategic objectives. Recruitment decisions are made solely on the basis of objective, job-related criteria. The recruitment process is grounded in clear job descriptions and defined competence requirements. One of the priorities is to fill positions, primarily through internal recruitment.

Selection criteria are clearly defined and communicated transparently, and candidates are chosen based on an objective assessment of their competences, in line with diversity principles. The Group’s companies ensure that all job postings, both

internal and external, are free from discriminatory criteria, and that the language used allows people of any gender to apply. These principles apply to all types of employment contracts.

With regard to annual performance evaluation, the Human Resources Management Policy guarantees all employees equal opportunities for professional development, based solely on skills, experience, performance and competences.

In line with the Remuneration Policy, the salary review process is based on the principle of equal treatment and on transparent, consistent rules for determining remuneration.

Implementation of policies for incidents of unequal treatment and discrimination, mobbing and harassment, including sexual harassment

Respect for employees’ dignity, boundaries and needs supports their integration, motivation and effective collaboration. It builds trust, facilitates communication and helps resolve conflicts before they escalate into issues such as mobbing, unequal treatment or discrimination. It is therefore a key element in preventing the most serious workplace violations. The Bank has implemented the Policy on dealing with violations of respect for others, which sets out the rules for reporting undesirable behaviours, the course of the investigation process and possible follow-up actions. The Policy guarantees confidentiality and protection against retaliation for both reporting individuals and participants in the proceedings.

The Bank unequivocally recognises unequal treatment, discrimination and mobbing – including harassment and sexual harassment – as unacceptable. All employment-related regulations comply with legal requirements, particularly those concerning the prohibition of unequal treatment. Preventing undesirable behaviours includes preventive measures (informational, educational and organisational) as well as corrective actions taken after violations are identified. The Bank conducts awareness raising training to help employees understand which behaviours are unacceptable and why they cannot occur in the workplace.

Good practices are promoted under the BNP Paribas Group Code of Conduct, including examples of behaviours that support an inclusive culture free from discrimination and mobbing. These efforts aim to effectively prevent all forms of unequal treatment.

Additional internal regulations against discrimination (in addition to the policies listed above in Table 92):

- BNP Paribas Bank Polska S.A. Work Rules,
- Rules 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 impacted by the Bank’s activities and who impact its operations is a key element of the due diligence process and of assessing the materiality of sustainability actions. The Bank conducts ongoing and transparent dialogue with stakeholders, covering both day-to-day operations and the processes of identifying and assessing impacts, opportunities, and actual or potential risks. As part of the due diligence process, the Bank, together with its employees and their representatives, engages in matters that concern them or may concern them in the future. This dialogue with



employees is based on several tools, whose description and quality assessment can be found in the section: [Interests and views of stakeholders \(SBM-2\)](#).

This dialogue is overseen by the Bank’s Management Board, which is responsible for managing material 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 (“Friday 6” Pulse Check).

The engagement of employee is assessed by analysing employee surveys and feedback, which is discussed by managers, HR Business Partners and the Management Board.

In 2018, BNP Paribas Group and UNI Global Union signed an International Agreement covering seven areas of fundamental labour rights, establishing a common framework of conduct for all Group employees. The Agreement was the result of collaboration between HR teams from key Group entities and negotiations with trade unions. The Agreement continues BNP Paribas’s long-standing tradition of social dialogue, previously reflected in three European agreements (on employment management, gender equality, and the prevention of work-related stress). At the end of 2024, the Agreement was renewed and will remain in force until the end of 2027.

Processes to remediate negative impacts and channels for own workforce 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. When a negative impact on the Group’s employees is identified, we take appropriate corrective actions and assess the effectiveness of the measures implemented.

Channels for reporting violations and handling employee issues

In its operations, the Group is guided by ethical principles and values that include, in particular, integrity, openness, mutual trust, responsibility, transparency, professionalism and respect. These principles apply to all areas of the Bank’s activities, regardless of their nature, and to all persons representing or cooperating with the Bank.

An integral part of the ethical framework is ensuring that employees can report suspected violations without fear of retaliation. Employees who have experienced a lack of respect towards themselves or others should first report such situations to their line manager or HR Business Partner. In cases where this is not possible, alternative reporting channels are available, as defined in the Policy on dealing with violations of respect for others in BNP Paribas Bank Polska S.A.

Violations can also be reported through the channels listed in the Whistleblowing Policy at BNP Paribas Bank Polska S.A. Such reports are dealt with in accordance with the standards set out in this regulation, ensuring confidentiality, impartiality and protection of whistleblowers.

Handling reports

The Bank’s procedure for handling reported violations is aligned with BNP Paribas Group policies and applicable national legislation. The Bank ensures the impartiality of individuals conducting investigations and eliminates the risk of conflicts of

interest. The principles of mutual respect form the foundation of the Bank’s organisational culture and should be reflected in the decisions and actions of all employees. To ensure a safe and supportive working environment, the Bank expects adherence to the highest standards of professional ethics and enables employees to report concerns about inappropriate behaviour by colleagues in a confidential and secure manner. In such cases, the Bank promptly takes action to support affected individuals, guided by responsibility and care for employees’ health and safety.

Every confirmed case of misconduct, regardless of the position of the person responsible, results in the application of appropriate disciplinary measures. In addition, corrective recommendations are defined, and their implementation is monitored.

Reports of violations are reviewed by the Employee Relations Team. Cases involving behaviours that may indicate mobbing or discrimination – including harassment or sexual harassment – are referred to the Employee Conduct Standards Committee. A report should include a description of the facts, including specific behaviours or actions that, in the reporting person’s view, constitute a violation, as well as, where possible, evidence supporting the reported events and information identifying the alleged perpetrator.

The Bank guarantees that every report will be examined thoroughly, fairly and with full confidentiality. Individuals who are the subject of a report are afforded the presumption of innocence. At BNP Paribas, we do not tolerate any form of retaliation against individuals who report violations in good faith or against those participating in the investigation process.

Employee effectiveness and trust assessment

The HR Compliance Team conducts regular reviews aimed at assessing the effectiveness of communication, the accessibility of information and the functioning of reporting channels, as well as the quality of the process for analysing and handling violations. When areas requiring improvement are identified, appropriate action plans are implemented, which may include, among other measures, strengthening communication about the available channels for reporting irregularities.

Confirmed violations subject to investigation are reported in aggregate to the Bank’s Ethics and Conduct Standards Committee. In addition, indicators related to violations are monitored quarterly in internal analytical systems available to the Bank’s management, enabling ongoing assessment of trends and the identification of potential risk areas.

Code of Conduct, Diversity and Inclusion survey

In 2025, the Group conducted its third survey among all employees on the Code of Conduct and Diversity & Inclusion (the survey is carried out every two years). The results of this year’s edition confirm employees’ strong commitment to the organisation’s core values and principles of ethical conduct. The main indices – the Conduct Index and the DEI Index – achieved high scores, exceeding 89%. A total of 94% of respondents declared that they are familiar with and apply the principles of the Code of Conduct, while 92% confirmed awareness of the available channels for reporting inappropriate behaviour. 94% of employees stated that the management team applies the Code’s principles in their daily work. More than 90% positive responses were recorded in areas related to the sense of fair treatment and respect, regardless of the various dimensions of DEI.



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 a range of measures aimed at preventing, mitigating and remedying potential and actual negative impacts on employees, as well as effectively managing material social risks and opportunities. As part of building an inclusive organisational culture, the Bank undertakes activities to prevent discrimination and promote equal treatment. The policy of respect for others is based on raising employee awareness, providing training and maintaining safe channels for reporting irregularities. The purpose of these measures is to prevent cases of discrimination, mobbing, harassment and sexual harassment, and to ensure an effective response when such situations occur.

The Bank also implements initiatives that support the protection of employees’ mental and physical health, including a broad range of benefits and the “Dobrze” well-being programme. To identify and mitigate psychosocial risks, psychological support programmes and mental health training are provided. In addition, the Bank ensures good and flexible working conditions that support work-life balance and allow employees to adapt their work arrangements to their individual needs. The Bank actively promotes work-life balance and encourages employee volunteering (more information in the POSITIVE Pillar, section: [BNP Paribas Foundation](#)).

Most of the implemented measures are short-term in nature, as they form an integral part of the annual processes and cycles carried out by the HR Area. These include employee opinion surveys, training activities, performance reviews, remuneration review processes, internal mobility, and initiatives related to health prevention and well-being in the workplace.

A diverse and inclusive workplace

Preventing and mitigating the negative impact of exclusion and the risk of litigation related to discrimination and unfair treatment

The Bank has for many years consistently developed an inclusive organisational culture that fosters creativity, supports innovation and encourages openness to new ideas, markets and Customers. This approach strengthens our competitive advantage while creating conditions that support employee development and contribute to the success of the entire organisation.

Everyday collaboration is built on trust and respect. We strive to ensure that each employee can fully express themselves, pursue their professional aspirations and passions, feel appreciated and have a genuine sense of influence on how the organisation operates.

Corrective actions and effectiveness monitoring

Regular employee opinion surveys confirm the effectiveness of the Bank’s efforts to build an inclusive work environment. In the most recent edition of the survey, 88% of employees declared that they can be themselves and feel accepted. A total of 89% of respondents believe that everyone has equal development opportunities regardless of diversity characteristics, and around 92% confirmed that their manager treats all employees fairly, with dignity and respect.

Employee-led networks supporting individuals from groups potentially exposed to unequal treatment play an important role in strengthening a values-based, respectful and inclusive organisational culture. In cooperation with these networks, the Bank implements numerous initiatives available to all employees, promoting diversity and inclusion in the workplace.

In 2025, the Bank continued its regular educational and communication activities covering various aspects of DEI, including campaigns, on-site events, meeting series, webinars and workshops, such as:

- Health Starts in the Mind – mental-health education,
- Diversity Days – a BNP Paribas Group initiative promoting DEI in every country, adapted to the local social context,
- Health Days – educational and preventive activities related to physical and mental well-being,
- Parenting Days – developing parental competences,
- Neuro-April – education on neurodiversity,
- Pride Month – initiatives supporting the LGBTQ+ community and promoting equal treatment.

Representatives of the Bank also actively participated in the work of the DEI Committee at the Polish Bank Association. Following the publication of the report “Diversity Management in Commercial Banks” in the previous year, in 2025 we co-created another sectoral publication – the report “DEI Good Practices in the Banking Sector”.

Respect for people: preventing unequal treatment, discrimination, harassment and violence at the workplace

Preventing and mitigating material negative impacts and risks of discrimination and violence at the workplace

Awareness-raising activities that help employees identify and effectively respond to potential violations – thereby preventing their escalation – include, among others:

- regular reminders of the rules applicable in this area, along with examples of behaviours covered by the regulations,
- indicating the available channels for reporting violations,
- emphasising the importance of employees reporting any situations that raise concerns, as well as the role of providing testimony during investigation processes, and ensuring protection for reporting individuals.

Managers have special responsibilities under the Code of Conduct to respect others, including:

- leading by example by complying with the highest ethical standards,
- creating an environment fostering open and honest communication,
- encouraging discussion of ethics and integrity in business decisions,
- regularly supporting employees and motivating them to raise any concerns without fear of negative consequences.



Steps in the violation reporting 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 behaviour relating to the Code of Conduct on respect for others. All reports are analysed with the necessary seriousness, integrity, fairness and discretion.

Steps in processing reported violations:

- Reporting violations – An employee who believes that he or she or another employee has experienced a violation may make a report through the reporting channels available under the Policy on dealing with violations of respect for others in BNP Paribas Bank Polska S.A.
- Preliminary analysis of the report 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 processed.
- Investigation – individual interviews are conducted with the persons involved, i.e. the reporting person, potential offender and witnesses, as well as analysis of additional documentation provided by those involved.
- Final document – preparation of a document containing the findings made and recommendations for further action in the case under consideration by the investigating team.

Sanctions

If the investigation confirms inappropriate behaviours or situations requiring intervention, the Bank takes appropriate actions towards all individuals concerned, including disciplinary measures. Decisions regarding sanctions are made by the Disciplinary Committee, based on the provisions of the Labour Code and internal regulations, taking into account the severity of the breach of employee duties.

Corrective actions and monitoring of effectiveness:

- The affected individual receives support from their manager and HR representatives, as well as – if needed – medical, psychological and social assistance. Guided by responsibility and care for employees’ health and safety, the Bank also implements measures to prevent similar situations from occurring in the future.
- In 2025, the Bank reviewed 17 reports, one of which – due to the nature and seriousness of the allegations – was referred to the Employee Conduct Standards Committee.
- Individuals responsible for inappropriate behaviour faced consequences proportionate to the confirmed violations, while affected employees received the necessary support.

Social protection benefits

Preventing and minimising potential negative impacts on social protection

As part of the Lux Med health care programme, the Bank finances a medical care package for employees (those employed at least 0.3 FTE). Employees can choose from several variants of benefit packages, each differing in the scope of available services.

The Bank’s benefit offers include:

- Employee Capital Plans,
- financial and insurance benefits: 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, hull and third-party liability automobile insurance,
- additional insurance packages, including 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).

Health and well-being:

- Lux Med healthcare programme for employees and their relatives (also for part-time and temporary employees),
- MultiSport Plus cards (employee, companion, children: Kids, Kids Aqua, Student, Senior),
- Worksmile application, which supports physical activities and integrates employees around their passions,
- Health Days for Group employees, which promote a healthy lifestyle (webinars on healthy eating, body composition analysis, relaxation sessions, office exercises),
- flu vaccination,
- vouchers for preventive examinations (cancer prevention, mental well-being, heart and vascular diseases).

Actions taken and planned

The Bank has implemented initiatives and measures aimed at improving employee well-being and social protection. Indicators related to the use of maternity, paternity and parental leave are monitored on an ongoing basis, enabling the Bank to assess the effectiveness of existing solutions and identify employee needs.

In 2024, in cooperation with representatives of the trade unions operating within the Bank, amendments to the Collective Bargaining Agreement for employees of BNP Paribas Bank Polska S.A. were agreed. These changes entered into force on 1 January 2025 and include, among others, the extension of employee entitlements related to childcare and support in life-event situations. The new provisions introduce, among others, the right to:

- **up to two weeks of leave**, under rules equivalent to paternity leave (no later than until the child reaches 12 months of age), available to an employee – regardless of gender – who does not hold parental authority but provides actual care for the child,
- **special-leave days** in situations such as the birth of a child, a child’s wedding or the need to provide care for a child under 14 years of age – also for employees in informal relationships (regardless of gender) and for employees who do not hold parental authority but provide actual care for the child,



- **an additional day off for job-seeking** in the event of termination of employment for reasons not attributable to the employee.

Corrective actions and effectiveness monitoring

The Bank monitors employee needs and well-being, among others through regular surveys assessing the benefits offering and well-being programmes. The insights gathered serve as a basis for tailoring actions and solutions to the real expectations of employees.

In 2024, a survey was conducted regarding the benefits offering and the “Dobrze” well-being programme. The results made it possible to define strategic directions and prepare action plans addressing the identified needs. The implementation of these measures continued throughout 2025.

Psychosocial risk detection and corrective actions

Concern for the mental and physical health of employees

Programme “Dobrze”

The Bank actively supports employee well-being by creating a work environment that promotes health and overall well-being, as well as business effectiveness. We care for employees’ mental and physical health, including protection against the effects of occupational stress, and we implement flexible work arrangements and organisational solutions that reduce the risk of overload and support efficiency.

We build a well-being oriented work environment through:

- **regular surveys and ongoing monitoring of employee well-being**, followed by data-driven actions aimed at improving working conditions and overall well-being,
- **education on mental and physical health** delivered through the well-being programme, including workshops and training on healthy lifestyles, stress management, burnout prevention and mental and physical self-care,
- **providing continuous psychological support**, including access to specialists and therapists, a psychological support and anti-burnout helpline, and programmes that help employees cope with stress and other mental health challenges,
- **encouraging physical activity**, supported by the Bank’s Sports Sections, which promote regular exercise and integration through sports,
- **promoting a healthy lifestyle** and encouraging employees to take care of their health through educational and preventive initiatives.

Annual health-related initiatives:

- **“Health Starts in the Mind”** – an event dedicated to building awareness of mental resilience and mental health care,

- **Health Days** – an initiative promoting health prevention, including educational activities (webinars), stress reduction sessions and vouchers for additional preventive examinations.

The Bank offers employees an attractive range of benefits and opportunities to take care of their health, develop sports skills and pursue their passions. The benefits offering has been designed so that employees’ family members can also benefit from it. The number and wide scope of available options allow employees to tailor the benefits to their individual needs.

Process of action identification to prevent material risks, corrective actions and their effectiveness

Managers play a key role in preventing psychosocial risks by recognising early signs and taking appropriate action. Through daily collaboration with their teams, they are able to notice unusual or concerning changes in employees’ behaviour, mood or attitude. To support them in this responsibility, the Bank provides educational initiatives for managers – including webinars and e-learning courses – and offers materials on topics such as mental health crises, burnout, working with persons with disabilities and neurodivergent employees. The Bank also provides dedicated psychological support channels for managers, taking into account the specific challenges of leadership roles in difficult or crisis situations.

Corrective actions focus on analysing identified manifestations of psychosocial risk and implementing appropriate interventions. The Bank uses employee feedback – including comments from engagement surveys and regular pulse checks – to respond quickly to emerging signals and needs.

The Bank ensures that managers have continuous access to information about the situation within their teams through dashboards that include key HR risk indicators such as absenteeism, leave usage, overtime and turnover. Managers also receive analyses of the results of the regular Pulse Check engagement survey and the weekly Friday 6 satisfaction surveys. This enables them to identify concerning trends in real time and respond to signals indicating a potential decline in employee well-being.

Professional equality actions

Actions on taking advantage of gender diversity opportunities

The Bank consistently fosters a culture of courage, empowerment and diversity, treating it as a foundation that supports effectiveness, creativity and employee engagement. In close cooperation with employee-led networks, numerous initiatives are carried out to strengthen various dimensions of diversity and inclusion.

In 2025, the Bank had six employee networks:

- **“Women Changing BNP Paribas”** – a network supporting the development of women,
- **“Dad, You’ve Got This”** – a network for fathers,
- **“BNP Paribas PRIDE Poland”** – supporting the LGBT+ community,



- **“Wiek Agawy”** – focused on employees aged 50+ and intergenerational dialogue,
- **“OZNacza mogę”** – bringing together employees with disabilities and their allies,
- **“Neuronauts”** – focusing on neurodiversity.

Together, we carried out numerous diversity and inclusion initiatives, strengthening an organisational culture rooted in equality and enriched by diverse perspectives.

Gender equality initiatives to promote equal opportunities for women and men

- **reducing the gender pay gap** by ensuring equal opportunities for promotion, access to talent and development programmes and by setting specific gender-balance targets at all levels of the organisational structure, while implementing a transparent remuneration policy focused on equal pay for equal work and performance,
- **the marketing campaign “One Word Is Enough”**, promoting the use of feminine forms in Polish as a tool for counteracting stereotypes and supporting gender equality,
- **partnership with the Share the Care Foundation** and implementation of the projects “Equal at Home, Equal at Work”, “Proud to Be a Working Mum” and “Facet na 100 pro”,
- **cooperation within the #WiedzaNieMaPłci initiative**, aimed at strengthening the presence of women experts in public debate and reducing disparities in the media,
- **partnership in the programmes “Sukces To Ja”, “Co z tą kasą”** and in the **Businesswoman of the Year** competition organised by the Sukces Pisany Szminką Foundation,
- supporting the initiatives of **30% Club Poland**, **#JamaisSansElles** and the **Champions of Change Club**,
- **partnership in the Women in IT Day** events organised by Future Collars,
- implementation of proprietary development programmes run by the **Women Changing BNP Paribas** network, such as **Women UP** and the Future UP mentoring programme (recognised in the “Super M” competition in the Business category in 2025, and a finalist in 2024).

Parenting initiatives

- **Parenting Days** is a recurring event during which children have the opportunity to visit their parents’ workplace and take part in a variety of workshops promoting values important to the Bank and aligned with the Sustainable Development Goals. In 2025, the programme included, among others, first aid classes, financial education, survival skills, ecology, AMP football workshops and activities using new technologies (VR). A dedicated space was also prepared for neurodivergent children, with therapeutic support provided. Employees could develop their parenting competences through webinars, workshops and expert sessions covering topics such as relationships with teenagers, adoption, autism spectrum and ADHD diagnostics, school-related challenges and financial education.
- **Partnership with the Share the Care Foundation**, which promotes equal sharing of childcare responsibilities and supports the development of engaged fatherhood. The Bank participated, among other activities, in the Foundation’s international conference “Equal at home – equal at work. How to effectively support parents in balancing family and work life?”.
- **Parenting consultations** (parental support) available as part of the “Dobrze” well-being programme.

Initiatives to promote equal opportunities for people with disabilities

- the educational campaign **“Different Abilities, One Goal”** and a dedicated intranet space,
- the interview-based film series **“People with Experience”**, featuring conversations with employees living with disabilities or health challenges, who share their stories with the Bank’s community,
- **awareness raising activities**, including a meeting with the film makers and a screening of the film “Szczęście Agaty”, workshops with Sebastian Grzywacz (“Odłotowy Niewidomy”) and Małgorzata Szumowska (“Invisible Exhibition”), as well as the immersive experience “Cinema You Cannot See”,
- **training for managers** on the inclusion of employees with disabilities,
- **a savoir-vivre guide** for interacting with persons with disabilities,
- **support for employees in obtaining disability certificates** and other benefits, including a webinar organised in cooperation with the OZNacza Mogę network,
- **a dedicated role responsible for disability inclusion** and a dedicated position within the recruitment team,
- **partnership in Incluvision by the Aktywizacja Foundation**, aimed at facilitating labour market access for persons with disabilities. The Bank is the main partner of the 3rd Inclu(vi)sion Congress and the virtual job fair for persons with disabilities.

Initiatives to promote equal opportunities for neurodivergent persons

- the **awareness campaign** “A Different Look at a Different Look” on neurodiversity, including webinars, educational materials and a dedicated intranet space,
- **“People with Experience” testimonials** focused on neurodiversity – including the story of an employee with ADHD and their collaboration with a manager, as well as the perspective of a parent of an adult on the autism spectrum,
- **a guide for managers** on effective collaboration with employees on the autism and ADHD spectrum, prepared by the Neuronauts community, along with dedicated expert psychological support for managers of neurodiverse teams,
- **webinars and educational workshops** on autism and ADHD, covering diagnostic aspects and forms of support, as well as educational activities for parents and caregivers of neurodivergent children,
- **cooperation with the AsperIT Foundation**, including post-audit implementations and obtaining the certificate “Neurodiversity-Friendly Workplace 2025–2027”,
- **sharing the Bank’s good practices**, including SWPS postgraduate studies, the JIM Foundation report, the NeuroShow event, and initiatives by Top Employers and Orange.

Initiatives to support the LGBT+ community

- International Conference **“BNP PARIBAS GLOBAL LGBT+ BUSINESS CONFERENCE”** at the head office in Warsaw with representatives of 17 countries, NGOs and businesses (Lambda, Open For Business, Orange PL, Ikea, CD Project, Love Doesn’t Exclude, Us Parents, Warner Bros Discovery), Pride Parade in Warsaw,



- **implementation 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, cooperation with the Rainbow After the Storm Foundation, which offers psychological support for people from the LGBT+ community, and partnering with the Us Parents Association and the All Inclusive Festival (Sailor Cinema Foundation).

Initiatives to support age diversity

- education on the topics of diversity and inclusiveness in the area of age diversity around the report "Generations: differences or similarities. From stereotypes to synergy"; Dynamic conversations on intergenerational topics delivered in cooperation with the Off School Foundation; Intergenerational management in practice; initiatives on menopause and andropause.

The Bank places strong emphasis on the genuine implementation of diversity principles, including ensuring appropriate representation of women in statutory bodies. As at 31 December 2025, women accounted for 50% of the Supervisory Board and 37.5% of the Management Board. Compliance with diversity principles is monitored not only at the level of the Bank's governing bodies but also across managerial positions. At the end of 2025, women held 45% of the top management positions within the Group.

Social engagement

"*You Can Count on Me*" is the motto of the employee volunteering programme that the Bank has been running continuously since 2011. A detailed description of the initiatives can be found in the POSITIVE Pillar, in the section: [BNP Paribas Foundation](#). Employee volunteering activities are also part of the BNP Paribas Group's international initiative #1MillionHours2Help, coordinated in Poland by the BNP Paribas Foundation.

These initiatives strengthen employee well-being, build engagement and support long-term retention within the Group.

Employee development

Action intended to take advantage of important skills development opportunities

The Bank is developing a competent organisation capable of effectively implementing its business strategy and building long-term value. We invest in the development of leaders, talents, experts and all employees, responding to key competence needs.

A central element of our development policy is strengthening effective leadership in line with the **BNP Paribas LeaderUP** competence model. Competent leaders drive organisational growth, and the model promotes behaviours that support strong business performance and a positive work environment. Leaders benefit from a wide range of development activities, including webinars, workshops and individual consultations. The Bank also offers the **Leader Development Academy** (*NewBorn Leaders*) – a programme dedicated to employees beginning their managerial path. For senior management, *Stronger Together* events are organised on a regular basis.

Creating a continuous development culture

To ensure that the organisation has competent employees and is prepared for future challenges, the Bank consistently develops a culture of lifelong learning. This culture is supported through reskilling and upskilling programmes and through a mechanism of employees' individual responsibility for personal development. Each employee creates an **Individual Development Plan** that defines the scope and timeline for acquiring new competences.

The Bank provides access to a wide range of training courses and webinars. In addition to mandatory job-specific training, delivered mainly in e-learning format, employees can benefit from an extensive package of individual training opportunities as well as co-funding for foreign language learning and university programmes. In 2025, as part of development activities, our employees filled 25,445 places across various training groups. We are also open to individuals who are just beginning to shape their professional path. The Bank's summer internship programme is dedicated to students who have completed at least their second year of studies.

For employees who are leaving the Bank, we offer programs to help them find their way on the labour 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 2025 in the Bank included:

- re-skilling and up-skilling programs: 3rd Lean Green Belt – 26 participants, Innovative Thinking – 61 participants,
- Digital Academy – a long-term up-skilling programme focused on developing knowledge and skills for working with AI. More than 1,000 participants joined individually dedicated paths, 8 topics in 14 training sessions were implemented. More than 1,000 participants used the AI knowledge library (e-learning training, videos, ebooks), 37 employees participated in the #EngineAI 2.0 path. A total of 13 use cases aimed at optimising business processes were developed.
- **#MyWay** – more than 5,000 participants, 89 topics were implemented in 240 sessions,
- **#MyWay** internal expert community – more than 1,600 participants, 32 topics were implemented in more than 120 sessions,
- **UniversITy** – development programme delivered by internal experts, mainly NTCS experts, on high technology – more than 1,600 participants, 27 topics were implemented in 40 sessions,
- **Women Up** development programme – 90 participants, Future UP mentoring programme – 140 participants, within the 'Women Changing BNP Paribas' employee network.

In 2025, the local edition of Career Days at BNP Paribas Bank Polska S.A. was held under the slogan "Developing your career at the Bank is a *#gooddecision*." The main objective of the events organised as part of Career Days was to increase employees' awareness of and engagement in their professional development by exploring opportunities for internal mobility. We encouraged employees to actively manage their careers, learn about the various development paths available within the organisation, and build the competences needed to transition into new roles within teams, as well as across



teams, departments and/or BNP Paribas Group companies. Five events brought together more than 400 participants in total.

One of the key target groups for investments in competences are Talents who are ambassadors of change and innovation. We carry out 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. Emerging LFTs (40 persons) joined a 10-month local development programme ended in June 2025. In December, we launched a local programme for the Advanced group. We invited 42 participants to join, and the programme is scheduled to run until September 2026.

Training: ESG

The Bank continuously strives to increase employees’ awareness of the sustainable transition. In 2025 an ESG e-learning course mandatory for all Bank employees was launched. 7,052 people completed the training. More information on ESG education can be found in the section [Transition resources](#).

The Bank’s firm goal is to remain a leader in sustainable finance and a partner in supporting the sustainable development of the economy. We build a Sustainability Community which 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.

Development at work

The AboutMe platform, which serves employees, managers and HR in managing career paths, is aimed at:

- declaring skills by employees, through which a range of programmes, training and resources are built to support professional development. In 2025, 5,322 i.e. 72.4% of employees (of which about 65% 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,
- conducting an annual professional evaluation process.

Internal mobility and the career-path system are important elements of the positive employee experience in the Group. This mechanism is based on diagnosing individual strengths, predispositions and talents, which helps employees make informed decisions about their professional development and set short- and long-term goals. The Bank supports employees by providing tools and development activities that enable them to identify their potential and build their career paths accordingly. These paths cover a variety of roles and specialisations, allowing employees to plan their development in line with their aspirations while taking into account the needs of the organisation. The Bank identifies competences that are key from the perspective of the strategy and individual business areas, preparing employees – through upskilling programmes – for the professions of the future. As a result, people working at the Bank can shape their career paths in line with market trends, technological advancements and the evolving business environment.

The internal job market and internal mobility are key pillars of career management, aligning the organisation’s needs with employees’ development expectations.

The Bank encourages employees to pursue internal mobility by promoting job opportunities available within the Bank and across Group companies through internal communications and a dedicated page on Echonet. Internal job postings are communicated transparently within the Group, together with clearly defined criteria expected from candidates for each position. Internal promotions are preferred, giving employees priority in recruitment for new roles. This approach aims to retain and develop talent within the organisation and to strengthen a culture of loyalty. Employees play a proactive role in their mobility, supported by their managers and HR, who encourage development through taking on new professional roles, both within the current business area and in other parts of the organisation or Group companies.

Resources used 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 sum of employee and managerial behaviour creates the organisation’s culture that enables the Bank to achieve and maintain a competitive advantage and realise 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 goal is to continually build an organisation that is an exceptional place to work attracting the best candidates from the labour market, fostering motivation and efficiency among employees. Only committed and effective employees, managed by exceptional leaders, acting in the spirit of agile and in accordance 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 skills future skills 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 equipped with core 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, attractive employee offerings and development opportunities, gives a complete picture of the organisation we are building.

We make sure that strategic targets are consistent with team and 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 practise 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 goal in managing the employee experience is to create a work environment in which every employee feels listened to, valued, and has a real impact on shaping the Bank's organisational culture and processes. This approach allows us to act comprehensively and focus on all aspects of employees' working lives, from recruitment to departure. The measures taken are aimed at increasing employee engagement and job satisfaction.

Employees experience management is implemented in the following areas:

- **Building a culture of openness, trust and respect** – creating an environment in which employees can be themselves, feel safe, and freely share their opinions, ideas and concerns, with open communication serving as a foundation of organisational success.
- **Embedding the employee voice in strategic decisions** – implementing solutions that enable the systematic inclusion of employee experience in shaping strategy and making key decisions.
- **Stimulating innovation and continuous improvement** – using employee feedback to identify areas for improvement and to implement new, effective solutions.
- **Increasing engagement and satisfaction at all levels of the organisation** – regularly monitoring engagement and satisfaction levels and taking actions aimed at strengthening them.

These dimensions translate into concrete actions:

- **Defining, describing and measuring employee experience** – to create a satisfying and engaging work environment at every stage of employment.
- **Regular engagement and satisfaction surveys** – conducting cyclical surveys whose results are systematically analysed, enabling the identification of key trends and areas for improvement.
- **Monitoring current sentiment** – running short, weekly pulse surveys that allow for quick responses to emerging needs.
- **Strengthening a feedback culture** – promoting regular, constructive feedback as a natural element of collaboration.
- **Enabling employee voice surveys** on topics of strategic importance from the Bank's perspective.

All planned commitments to a diverse and inclusive workplace were delivered:

- 37.5% participation of women in management positions,
- reduced adjusted pay gap,
- increased employment of people with disabilities,
- regular monitoring of key diversity and inclusion metrics,

- BNP Paribas Group's regular survey on the Code of Conduct and diversity and inclusion,
- continuous support for grassroots employee initiatives for groups at risk of exclusion.

Table 94. Strategic indicators on social responsibility

Pillar		Strategic indicator	Target 2025	Implementation 2025
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%	3.7%
	eNPS – employee Net Promoter Score [vs 2021: -9]		20	20

Characteristics of the undertaking's employees (S1-6)

The tables below include all active employees of the Group hired under 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 at 31 December 2025.

Table 95. Employment by gender

Gender	2025		2024	
	Number of employees	Number of FTEs	Number of employees	Number of FTEs
Women	4,576	4,562	4,778	4,761
Men	2,679	2,667	2,734	2,717
Total	7,255	7,229	7,512	7,478

active employees without technical and duplicate positions within the Group

As at 31 December 2025, the Group employed 7,255 people. Compared with 2024, the number of employees decreased by 257 (i.e. by 3.4%). As at the end of 2025, 63% of the Group's employees are women and 37% are men. All Group employees are employed in Poland.



Table 96. Employees by contract type

Form of employment	2025			2024		
	Women	Men	Total	Women	Men	Total
Total employees						
Number of employees	4,576	2,679	7,255	4,778	2,734	7,512
Number of full-time positions	4,562	2,667	7,229	4,761	2,717	7,478
Permanent employees						
Number of employees	4,056	2,387	6,443	4,185	2,418	6,603
Number of FTEs	4,042	2,376	6,418	4,172	2,403	6,575
Fixed-term employees						
Number of employees	520	292	812	593	316	909
Number of FTEs	519	291	810	589	314	903

active employees without technical and duplicate positions within the Group

The vast majority of employees are employed under permanent contracts (almost 89%), similar to 2024.

Table 97. Employees by contract type

Type of contract	2025			2024		
	Women	Men	Total	Women	Men	Total
Total persons employed						
Full-time contract	4,531	2,649	7,180	4,719	2,696	7,415
Part-time contract	45	30	75	59	38	97

active employees excluding technical and duplicate positions within the Group.

In 2025, 75 employees were hired in part-time (approximately 1% of the Group’s workforce), compared to 95 in 2024.

Table 98. Leavers

	2025			2024		
	Women	Men	Total	Women	Men	Total
Total number of leavers						
Voluntary leavers, including retirements and others	383	234	617	472	258	730
Dismissal	260	130	390	287	120	407

active employees excluding technical positions and duplicates within the Group.

Table 99. Turnover

	2025			2024		
	Women	Men	Total	Women	Men	Total
Turnover by employees	12.7%	13.3%	12.9%	14.4%	13.6%	14.1%
Turn-over by FTEs	12.7%	13.2%	12.9%	14.4%	13.6%	14.1%
Voluntary turnover by employees	7.6%	8.6%	7.9%	8.9%	9.3%	9.0%
Voluntary turnover by FTEs	7.6%	8.5%	7.9%	8.9%	9.3%	9.0%

All Group employees excluding technical positions.

Turnover in the table above is calculated as the number of people leaving excluding technical positions to the Group’s average annual headcount. The overall turnover rate in 2025 was 12.9% (compared with 14.1% in 2024).

Table 100. Number of new employees hired in the Group

	2025	2024
Women	388	508
Men	306	331
Total	694	839

active employees excluding technical and duplicate positions within the Group.

In 2025, the Group hired a total of 694 new employees, which represents a 17% decrease compared with 2024.

Characteristics of associate workers in the undertaking’s own workforce (S1-7)

The total number of associates who are not employees and whose work is controlled by the organisation are office staff responsible for registration of contracts for the sale of financial products, sale of insurance, completion of documentation, verification of documents, etc. At the end of 2025, we had 345 associates, an increase of 26 compared with the end of 2024.

Table 101. Characteristics of associates in own workforce

	2025	2024
Number of associates	345	319



Collective bargaining coverage and social dialogue (S1-8)

A Collective Bargaining Agreement (CBA) is a type of collective agreement concluded through negotiations between the employer and employees represented by company trade unions operating at the Bank.

The Collective Bargaining Agreement has a normative character, meaning that its provisions apply to the employees covered by it in a manner similar to statutory regulations. The document defines the mutual rights and obligations of the parties to the employment relationship, in particular working conditions, remuneration rules and other employment-related benefits. The Agreement also makes it possible to introduce solutions that are more favourable than those provided for in the Labour Code. Our Collective Bargaining Agreement includes provisions that go beyond the standards commonly applied on the market, ensuring that employment and remuneration conditions are better aligned with the specific nature of the Bank’s operations.

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 management contracts.

Table 102. Percentage of employees covered by collective bargaining agreement

	2025	2024
% of employees covered by the collective bargaining agreement	99%	99%

Table 103. Collective bargaining coverage and social dialogue in the Group

Coverage ratio	2025			2024		
	Collective bargaining agreement		Social dialogue	Collective bargaining agreement		Social dialogue
	EEA employees	Non-EEA employees	Representation (EEA only)	EEA employees	Non-EEA employees	Representation (EEA only)
80-100%	Poland	-	Poland	Poland	-	Poland

A country/region (outside 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.

There are five trade union organisations within the Bank. The employer cooperates with them on matters related to collective labour law (e.g., conducting negotiations and concluding collective agreements, agreeing on employment and remuneration rules) as well as individual labour law (e.g., consultations regarding the intention to terminate an

employment contract or change employment conditions, representing employees in the appeal process related to annual performance reviews, participation in the Employee Conduct Standards Committee, and granting consent for the termination or modification of employment conditions for trade union representatives and social labour inspectors).

The employer regularly meets with trade union organisations to engage in dialogue on the rights and professional and social interests of employees. In 2025, eight agreements were signed under collective labour law.

The development of social dialogue between employees and management takes place not only at national level, but also internationally, through the European Works Council (EWC).

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 key aspects of the company’s international and local operations that may affect the working conditions of employees in countries belonging to the EWC (European Union countries and, in BNP Paribas, also England).

The EWC participates in the consultation with the Management Board of the BNP Paribas Group on decisions that may impact the cross-border situation of employees. It represents employees working in all BNP Paribas Group units in Poland internationally, has an impact on the Group’s global initiatives and on the content of documents and agreements developed at the international level which apply also in Poland. It supports the promotion of the best experiences of other countries in the area of social dialogue 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 94).

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 104. Group employment structure by gender – number and percentage of employees

Employment structure	2025					2024				
	Women		Men	Total		Women		Men	Total	
Management Board (of the Bank and subsidiaries)	4	29%	10	71%	14	4	27%	11	73%	15
Top management (B1+B2)	166	45%	207	55%	373	196	46%	233	54%	429
Lower-level management	283	55%	229	45%	512	287	58%	210	42%	497
Other employees	4123	65%	2233	35%	6,356	4,291	65%	2,280	35%	6,571
Total	4,576	63%	2,679	37%	7,255	4,778	64%	2,734	36%	7,512

active employees excluding technical and duplicate positions within the Group.

Table 105. Group employment structure by age – number of employees

Employment structure	2025				2024			
	<30 years	30-50 years	>50 years	total	<30 years	30-50 years	>50 years	total
Management Board (of the Bank and subsidiaries)	-	5	9	14	-	6	9	15
Top management (B1+B2)	3	254	116	373	4	316	109	429
Lower-level management	5	382	125	512	7	386	104	497
Other employees	766	4,379	1,211	6,356	838	4,620	1,113	6,571
Total	774	5,020	1,461	7,255	849	5,328	1,335	7,512

active employees excluding technical and duplicate positions within the Group.

In 2025, the Group had 774 employees under the age of 30, 5,020 employees between the ages of 30 and 49, and 1,481 employees over the age of 50.

The overall average age in the Group in 2024 is 42 years: 42 years for men and 43 years for women (in 2024: 41 years for men and 42.1 years for women). The longest length of service is 42 years (in 2024: 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 adequate wages according to various criteria, such as location (by country and within countries in the main cities where employees work), household size (assuming two adults and a certain number of children, depending on the country's fertility rate) and the average number of income earners in the household.

The adequate wage data is updated annually by FairWage Network and forms the basis for the development and implementation of the Group's action plans. According to such guidance, all employees of the BNP Paribas Bank Polska Group receive adequate wages.

The Group adheres to the minimum wage rules in effect in Poland. As of January 2025, the gross minimum wage was PLN 4,666. With regard to adequate wage, the Group defines it as a level of remuneration that is adequate to cover the basic needs of the employee and their family, particularly with regard to housing, food, health, education, transportation, transport, and savings.

In accordance with the Bank's pay grades, the minimum base salary for an FTE was PLN 5,300 as of March 2025.

In addition to base salary, employees may receive variable remuneration (bonuses), 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.

Social protection (S1-11)

All employees of the Group are covered by income protection insurance in the event of any of the following: illness, unemployment, accident at work/disability, parenthood, retirement. The benefits offered to the Bank's employees are described in detail in the section [Social protection benefits](#).

Persons with disabilities (S1-12)

Table 106. Percentage of employees with certified disabilities employed by the Group by gender in 2025

	2025			2024		
	Women	Men	Total	Women	Men	Total
% of employees	1.9%	1.4%	1.7%	1.7%	1.5%	1.6%

active employees excluding technical and duplicate positions within the Group.

As at 31 December 2025, the Group had 123 active employees with disabilities (2024: 122 employees), which represents 1.7% of active employees in the Group. In 2025, 5 employees with disabilities were hired.



Training and skills development metrics (S1-13)

Table 107. Percentage of employees subject to regular performance and career development reviews in 2025

	2025			2024		
	Women	Men	Total	Women	Men	Total
Percentage of employees subject to regular performance and career development reviews	100%	100%	100%	100%	100%	100%

The process of setting targets and conducting 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. 7,104 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 in 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 own workforce. They include both training at the headquarters of the Bank/Group company as well as online training (e-learning).

Table 108. Average number of training hours for employees in 2025

	2025			2024		
	Women	Men	Total	Women	Men	Total
Average number of training hours completed by employees	36.1	33.9	35.3	27.1	29.3	27.9
Average number of training hours completed by employees (excluding mandatory training)	26.8	28	27.2	13.8	18.7	15.5

active employees excluding technical and duplicate positions within the Group.

The increase in training hours compared with the previous year results primarily from the expansion of the development offering for employees. Throughout the year, numerous new training programmes were introduced, including the innovative

LeaderUP programme for managers, which focuses on developing leadership skills based on the Bank’s competence models and values. In addition, the duration of the #MyWay development sessions – available to all employees – was extended, enabling deeper professional and personal growth. A further noticeable increase in training hours stems from active participation in various business academies and from training delivered as part of the agile transformation, which supports teams in adapting to new ways of working and enhancing operational efficiency.

Health and safety metrics (S1-14)

Table 109. Health and safety at work

	2025	2024
% of employees covered by an occupational health and safety management system based on legal requirements and/or recognised standards or guidelines	100%	100%
Number of fatalities due to work-related injuries and illnesses	0	0
Number of registered work-related accidents	29	18
Percentage of recordable occupational accidents (frequency rate: number of accidents per 1 million hours worked)	1.31	0.77
Number of recordable cases of work-related ill health (subject to legal restrictions on data collection)	0	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	566	577

The occupational health and safety management system covers all employees of the Group who are employed under an employment contract.

In 2025, most accidents in the Bank occurred in the office. As in the previous year, these were mainly slips, unfortunate and uncoordinated movements, and incidents resulting from failure to follow safety rules on internal walkways. Five accidents during business travel were also recorded and classified as work-related accidents, as well as seven incidents during remote work. There were no fatal accidents or cases of serious injury.

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 110. Percentage of eligible employees who took family-related leave by gender

	2025	2024
Percentage of employees entitled to take leave for family reasons		
women	100%	100%
men	100%	100%
Total	100%	100%
Percentage of employees entitled who took family-related leave		
women	27%	28%
men	11%	13%
Total	21%	23%

active employees excluding technical and duplicate positions within the Group.

The Group also carries out numerous activities promoting parenthood, as described 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 111. Pay gap metric

	2025	2024
Pay gap metric (total pay)	30.4%	31.5%
Pay gap metric (fixed pay)	29.1%	29.6%

active employees excluding technical and duplicate positions within the Group.

We implement a rational, balanced and controllable remuneration policy at the Bank 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.

The pay gap is calculated for active employees employed as at 31 December 2025, excluding: persons hired after 30 September 2025; employees absent for at least 3 months whose absence continued on 31 December 2025; technical and duplicate positions within the Group; members of Supervisory Boards and expatriates. The indicator was calculated based on the annualised gross base salary from 2024, using the December 2025 rate, and the annualised variable remuneration awarded in 2025 for the achievement of 2024 targets. Night-shift allowances and overtime pay were excluded from the calculation.

Table 112. Ratio of the highest annually paid individual to the median total annual remuneration

Remuneration metric	2025	2024
Ratio of the highest annually paid individual to the median total annual remuneration of all employees (excluding the highest paid individual)	35.3	41.5

The ratio of the annual total remuneration of the highest-paid individual in the organisation to the median annual total remuneration of all employees (excluding the highest-paid individual) amounted to 35.3 (vs. 41.5 in the previous year). The level of the metric and its change in 2025 compared with 2024 result from the following factors:

- The annual review of base salaries, including pay updates in line with the applicable remuneration policy and actions aimed at reducing pay gaps across specific positions.
- The transformation of roles within the Bank driven by process optimisation – including automation, digitalisation and improvements in operational activities – which leads to the creation of new roles and an increased demand for key market competences, often associated with higher remuneration.

Incidents, complaints and severe human rights impacts (S1-17)

Table 113. Incidents, complaints and severe human rights violations

Incidents, complaints, violations	2025	2024
Number of discrimination cases handled, including harassment and mobbing	0	2
Number of complaints handled regarding social issues related to working conditions, equal treatment (excluding discrimination, harassment and mobbing)	17	15
Total amount of significant fines, penalties, and damages as a result of incidents and complaints (discrimination and harassment)	0	0
Number of serious incidents involving human rights violations	0	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.). The violation reporting process is described in detail in the section [Processes to remediate negative impacts and channels for own workforce to raise concerns \(S1-3\)](#).



Consumers and end-users (ESRS S4)

This section of the Sustainability Statement focuses on four key topics related to consumers and end-users of the Group’s products and services: data privacy protection, transparency and adequacy of information, Customer satisfaction, and social inclusion.

Customer relations are a key element of the Group’s business model, as reflected in the Bank’s business strategy. The objectives developed under the four pillars of the strategy, including those related to Customers, are described in detail in the chapter [Implementation of the GObeyond Strategy](#), and the results of the strategy’s implementation are presented in the section [Strategy, business model and value chain \(SBM-1\)](#) under General Disclosures (ESRS 2).

The following sections present an analysis of the Group’s strategy, policies and actions in the area of consumers and end-users, understood as direct retail Customers of the Retail and Business Banking segments as well as Personal Finance.

Strategy

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 – SBM-3)

Based on the double materiality assessment (DMA) conducted by the Group, presented in the section [Description of the process to identify and assess material impacts, risks and opportunities \(IRO-1\)](#) under General Disclosures (ESRS 2), the material impacts, risks and opportunities (IRO) related to consumers and end-users have been identified

Material impacts identified by the Group

Negative impact related to transparent and adequate information

Financial products and services offered to retail Customers could generate a material negative impact if communicated information is not sufficiently clear and fair. 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, resulting in decisions that are not adequate to their needs or financial situation. This exposes Customers to possible financial difficulties.

Customers who are vulnerable or have limited knowledge of complex financial instruments may be particularly exposed to negative consequences, which increases the risk of financial losses or making unfavourable investment decisions. To mitigate this risk, the Group applies the legally required MiFID appropriateness test, also available in online banking, which Customers complete before starting to invest. For individuals interested in credit products, the Bank conducts a creditworthiness assessment that protects Customers from taking on obligations that are not aligned with their financial capacity. Marketing materials and Customer communications are reviewed for plain language to ensure that the information provided is clear and easy to understand. In addition, the Bank carries out control activities, including Customer satisfaction surveys, which assess not only product-related experiences but also the transparency of documents and credit processes, as well as the quality of information provided during the sales process. Based on survey results, phone interviews and Customer complaints, appropriate corrective actions are taken when necessary.

Although the Bank’s broad range of products and services means that a lack of adequate information could potentially affect a large number of Customers, this risk is effectively mitigated through the measures implemented by the Bank.

Negative impact related to 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 does not match the Customer’s risk profile).

Positive impact related to social inclusion

In the Bank and the Group, the impact includes facilitating access to services and products by taking specific action, for instance for seniors and people with disabilities, and by aligning and developing applications and digital tools for Customers experiencing any difficulty with access, for instance related to disability, neurodivergence, or low digital skills.

Negative impact related to personal data protection

The Group processes a certain amount of personal data of its Customers, such as identification data (e.g. full name, ID card number, PESEL number, etc.) or contact details (e.g. mailing address, e-mail address, telephone number, etc.). Violations of personal data protection regulations – including the General Data Protection Regulation (GDPR) applicable in the European Union – and/or the loss or theft of confidential information concerning individual Customers may result in a material negative impact on Customers caused by the Group.

When defining data protection measures, the Bank takes into account impact on specific Customer groups, such as seniors, children, and online banking users, who may be particularly vulnerable to the risk of breach. This analysis is part of the personal data protection assessment.

Material risks identified by the Group

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 in potential claims raised by Customers in court.

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, individual negotiations have been conducted with Customers with whom the Bank 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 assessment, it was not possible to quantify the expected financial scale of opportunities relating the area of social inclusion. Consequently, the Bank considers this opportunity as non-material

Table 114. Summary of links between the material IRO and Policies, Actions, Metrics and Targets

Category	Material IRO	Name of the policy	Actions	Metrics and Targets
Negative impact	Financial difficulties due to lack of information	Code of Conduct Policy on the protection of the interests of Customers	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	–
Negative impact	Customers dissatisfaction	Code of Conduct Policy on the protection of the interests of Customers	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-organisational cooperation) processes	NPS
Negative impact	Impact related to legal risks and reputational risks resulting from the loss or theft of confidential data	Code of Conduct Bank’s personal data protection policy	Transversal training actions Data protection risk management process Dedicated management Dialogue channels with retail Customers Continuous improvement process	–
Positive impact	Social inclusion	Code of Conduct Policy on the protection of the interests of Customers	Transversal training actions Continuous improvement process Accessibility improvements Development of digital services (website, application, etc.) Accessibility projects	Number of Customer Centres with the ‘Barrier-free Facility’ certification
Risks	Legal risks and reputational risks due to lack of information and Customer complaints	Code of Conduct Policy on the protection of the interests of Customers Policy for handling complaints and reports of unauthorised payment transactions at BNP Paribas Bank Polska S.A. Policy for managing reputational risk at BNP Paribas Bank Polska S.A.	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 material negative impacts on retail Customers identified by the Group – such as financial difficulties resulting from a lack of information or dissatisfaction, as well as the loss or theft of data – do not stem from the Group’s strategy. They represent external side effects of the Group’s operations, arising from unintentional flaws in products or services and unforeseen negative consequences of the Group’s activities.

The material risks identified by the Bank in relation to retail Customers primarily concern situations involving breaches of legal or regulatory requirements and insufficient information about products and services introduced to the market. These risks are an inherent part of banking activities, and the Group consistently seeks to mitigate them as part of its strategic actions.

Managing impacts, risks and opportunities, metrics and targets

Policies related to consumers and end-users (S4-1)

In its efforts to manage the material impacts of its products and services on Customers and end-users, as well as the related risks and opportunities, the Group has implemented a set of policies presented in the table below. These policies apply to all retail Customers, in line with the definition provided in the introduction to this chapter, and do not include any exceptions.

Table 115. Summary of Policies relating to Consumers and end-users

Name of the policy	Description of the policy content	Description of the scope of the policy or exclusions	Description of the highest level of the organisation responsible for implementing the policy	Interaction with stakeholders
BNP Paribas Group Code of Conduct	The Code of Conduct sets out the rules of conduct that apply to all activities and employees of the Group.	The 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 .
BNP Paribas S.A. Bank Personal Data Protection Policy	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 Notice” in Polish, English, Russian and Ukrainian and the “Personal Data Protection Charter” on its website for its Customers . 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 Customers	The policy sets out the organisational 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 Bank’s website.
Policy for handling complaints and reports of unauthorised payment transactions at BNP Paribas Bank Polska S.A.	The Policy sets out the general principles applicable to the process of accepting and handling complaints and reports of unauthorised payment transactions at BNP Paribas Bank Polska S.A. Its provisions apply accordingly to the Bank’s Brokerage Office.	BNP Paribas Bank Polska S.A.	Daily Banking Operations Department, Bank’s Management Board	The policy is published internally only. Information for Customers on complaint handling is available on the Bank’s website .



Name of the policy	Description of the policy content	Description of the scope of the policy or exclusions	Description of the highest level of the organisation responsible for implementing the policy	Interaction with stakeholders
Policy for managing reputational risk at BNP Paribas Bank Polska S.A.	The Policy defines the framework for identifying, preventing and managing reputational risk, which may arise, among others, from transactions and activities carried out by the Bank (regardless of whether they relate to Customers or to the Bank's own operations).	BNP Paribas Bank Polska S.A.	Communication, Marketing, Customer Experience and Social Engagement Division, Bank's Management Board	The policy is published internally only.

In overseeing all applicable policies listed above, the Group applies both ongoing and periodic internal controls. The Bank's Personal Data Protection Policy is monitored by the Data Protection Officer, operating within the Risk area as part of the second line of defence. It may also be subject to first-line controls in accordance with the control plan adopted for a given year.

The policies listed in the table above are fully in line with international frameworks regarding consumers and end-users, including the UN Guiding Principles on Business and Human Rights. The Bank refers to human rights in dispersed ways, i.e., across various internal regulations, including the BNP Paribas Group Code of Conduct, which obliges the Bank to respect human rights in its operations and to promote human rights within its sphere of influence, including among Customers.

The right to privacy with regard to retail Customers is recognised 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. No cases were recorded 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. No human rights incidents were reported in 2025.

External stakeholders, including Customers, may use the whistleblowing system via the channels made available on the Bank's website.

The protection of whistleblowers against the risk of retaliation has been strengthened through the incorporation into internal regulations of the requirements of the Whistleblower Protection Act of 14 June 2024. Individuals involved in handling a report are required to maintain the confidentiality of the whistleblower's data as well as all parties to the proceedings. At the same time, the Group ensures that whistleblowers are protected from the risk of potential retaliatory actions, and any person who believes they have been subjected to such actions may report this; the report will be reviewed in accordance with the standards applicable in the Human Resources Management Area. This protection applies regardless of the reporting channel used by the whistleblower.

Processes for engaging with consumers and end-users about impacts (S4-2)

Transparent and non-misleading information

The policy of protecting Customers' interests sets out the general principles for which all segments and organisational units of the Bank are operationally responsible, including the Compliance and Ethics Department. These principles include:

- ensuring that Customers have access to information that is reliable, fair, transparent, understandable and not misleading, regardless of the communication channel or format;
- providing, prior to the distribution of a product or service, all information necessary to understand:
 - the nature of the product or service being purchased, including its functions, benefits and limitations. Information that does not present the advantages and disadvantages of a product or service in a balanced manner would be considered misleading;
 - the costs associated with the product, service or advisory support;
- supplying information to Customers throughout the entire lifecycle of a product or service, where needed;
- designing products and services in a way that allows them to be easily explained and understood by Customers in the target group;
- responding to Customer inquiries as promptly as possible and with the highest quality.

In addition, the Group ensures:

- compliance with local legal requirements,
- the implementation of an internal control system that guarantees the transparency of information provided to Customers and compliance with regulations.

Each business manager is responsible for fulfilling these obligations.

Employee training, particularly for teams responsible for Customer relations and service, includes topics related to the protection of Customers' interests (more information 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 end-users, and effectiveness of those actions (S4-4).

Customer satisfaction

Since 2017, the Bank has been implementing the Advocacy programme, under which a system enabling broad and continuous listening to Customer voice has been introduced. The programme is built on two pillars, i.e., opinion surveys and the analysis of Customers’ spontaneous statements:

- 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 areas 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 such as a branch visit or phone call;
 - surveys dedicated to a specific Customer journey (e.g. establishing a relationship, managing credit card).

In addition to the NPS score and operational indicators (e.g., conversion rate, service time, etc.), the Bank considers the experience of employees to get the most comprehensive and in-depth picture of the Customer Journey, i.e. how Customers feel when they are in contact with the Bank.

- analysing Customers’ spontaneous statements, 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 media.

The results of the NPS benchmark supplemented the entire Customer feedback system. The lessons learned and topics to be addressed are communicated to the Management Board, unit managers and all employees concerned.

In 2025, approximately 125,000 surveys were conducted among retail Customers. Each year, the Bank sets a goal of improving its position relative to competitors.

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.

Focusing on Customer needs, the Bank designs its products and services to better address their key expectations. An example of this approach was the implementation of initiatives aimed at improving Customer experience in the area of car purchase financing. By enhancing the documentation required at the application stage and introducing reminders for Customers about the need to submit documents, the process was significantly simplified and shortened. As a result, transparency increased, Customer convenience improved, and NPS scores related to this process rose substantially. By analysing Customer experiences and emotions along Customer purchasing journeys, the Bank accompanies Customers at every stage of the process. It considers both Customer voice and the perspective of employees who have in-depth

knowledge of how individual steps are carried out. This approach makes it possible to identify moments that may pose challenges for either the Customer or the employee.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

Managing complaints

A key element of the Group’s policy on protecting Customers’ interests is the handling of complaints, carried out in accordance with detailed operational procedures. The Policy on protection of Customers’ interests sets out the rules for complaint handling, under which:

- Customers receive clear information about the available channels and the complaint handling process, and, where applicable, about the mediation protocol. The Bank also has a Customer Ombudsman, whose cases – handled by a dedicated team – are processed independently of the original complaint procedure,
- each complaint is acknowledged, and Customers are regularly informed about the progress of its review,
- a response to a complaint must be provided within no more than 60 calendar days,
- the complaint handling process is free of charge for Customers.

In addition, the Group ensures:

- that employees who interact with Customers have an appropriate level of knowledge about the complaint submission process,
- the monitoring of compliance with complaint handling rules,
- the analysis of complaint root causes and the communication of corrective actions and quality improvement programmes enabling the continuous enhancement of processes.

Standards for handling complaints and providing responses are described in the Policy for handling complaints and reports of unauthorised payment transactions at BNP Paribas Bank Polska S.A. The Policy 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 Customers.

The Bank offers Customers several convenient ways to submit complaints, allowing everyone to choose the form that best suits their needs. A complaint can be submitted via the chat function in the GOonline banking system or the GOMobile app, through the complaint form in electronic banking, by phone, by mail, or in person at any branch. Customers also have the option to refer their case to the Customer Ombudsman by using an online form, email contact, or traditional correspondence. This ensures that the complaint submission process is widely accessible and flexible.



The complaint handling process is one of the Bank’s main sources of Customer voice. The insights received support the Bank’s development and enable it to respond more effectively to Customers’ expectations and needs.

The Complaints and Correspondence Operations Team in the Daily Banking Operations Department consists of four specialised areas (circles), each responsible for different types of complaints, including the Customer Ombudsman Team. All Bank units involved in the complaint handling process jointly diagnose the issues reported by Customers, aiming to eliminate them in the future and to further align the quality of activities with regulatory expectations. This approach also enables faster responses to Customers. In this way, the Bank delivers on the two key pillars of the complaint handling process: quality and operational efficiency. In 2025, the number of complaints decreased by 2% compared with 2024, and the NPS for the complaint handling process reached 13 points at the end of 2025.

- 14 calendar days – average complaint processing time in 2025.

The number of complaints registered by the end of December 2025 was 55,880 (this covers all retail Customers and all types of complaints).

Table 116. Number of complaints received

	2025	2024
Number of complaints received	55,880	56,930

The Bank responds to Customer voice not only through the complaint handling process. In situations requiring an individual approach, cases are referred to the Customer Ombudsman Team, particularly when a Customer disagrees with the decision issued after the complaint review. The Team also analyses submissions addressed to the Management Board, the Supervisory Board or the Press Office, and supports communication with Customers who raise issues important to them on social media.

- In 2025, the Customer Ombudsman received 2,335 cases (including 143 referred directly to the Bank’s Management Board, Supervisory Board, and Press Officer).
- 82.5% of the people who used the Customer Ombudsman’s help in 2025 were retail Customers.
- 18.2% of the topics (the highest percentage) for which the Customer Ombudsman took action in 2025 concerned personal accounts.

A Customer who disagrees with the response to their complaint may submit an appeal through the available channels, as well as make use of the option to refer the matter to the appropriate external institutions. The entities authorised to conduct out-of-court consumer dispute resolution include the Banking Arbitrator at the Polish Bank Association, the Financial Ombudsman, and the Court of Arbitration at the Polish Financial Supervision Authority. Until June 2025,

Customers could also use the ODR platform – a tool enabling the submission of complaints to entities responsible for out-of-court dispute resolution within the European Union in cases involving contracts concluded electronically.

In carrying out the complaint handling process, the Bank aims not only to identify areas requiring improvement for product and process owners, but also to ensure that the entire process is transparent and intuitive for Customers.

Customers and employees use the GObetter complaint system, which enables the handling of submissions within a single, integrated environment. The system provides simple and intuitive navigation, real-time access to complaint status, and the ability to submit cases thanks to its integration with the GOonline electronic banking platform. It also supports advisors in resolving issues quickly through the Goodwill Gesture function. Increased automation and centralised data facilitate complaint analysis and the implementation of improvement measures.

The complaint handling process is continuously monitored in both qualitative and quantitative terms, and its results may influence the performance assessment of units involved in handling submissions. The Bank systematically collects and analyses information arising from complaints to draw conclusions, eliminate errors and assess the financial impact of incoming cases. The resulting reports are provided to the Management Board and the Bank’s leadership in line with the defined responsibilities of individual units, and the entire process is described in the Policy for handling complaints and reports of unauthorised payment transactions.

All Customer submissions are treated confidentially, with full respect for privacy and data protection. However, full complaint handling is not possible if a submission is anonymous or does not contain information allowing the identification of the Customer or the product.

Customers can submit their complaints and comments in complete safety, without fear of any consequences. Although the Bank does not have separate policies specifically protecting individuals using the complaint process from retaliatory actions, the applicable legal regulations clearly prohibit any form of retaliation against Customers for filing a complaint.

The proceedings initiated in 2022 by the Office of Competition and Consumer Protection (UOKiK) regarding customer complaints related to unauthorised transactions were still ongoing in 2025. The Bank is cooperating with UOKiK with respect to the further course and conclusion of the proceedings. More information is presented in the section [Court and administrative proceedings](#) in the chapter Additional information.

Customer satisfaction

Individual corrective actions apply to all Customers who completed a satisfaction survey following contact with the call centre. An advisor contacts each Customer within a few days, with particular attention given to those who provided suggestions – this follow-up helps to better understand Customers’ opinions and the reasons behind them.

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 of the analyses are incorporated into cross-sectional reports and into a platform presenting Customer feedback, which facilitates their regular sharing and monitoring within the Bank. The Bank draws conclusions from the corrective actions undertaken, supporting a continuous learning process. The Customer Experience Team regularly provides managers and business units with information on Customer issues and action plans, which are continuously updated based on new data from satisfaction surveys and complaints.

The Bank offers a variety of contact channels that enable Customers to raise their questions and needs. These enquiries are clarified by the first line of support and, where necessary, registered as complaints. Customers can use, among others: the chat function in the GOMobile app and GOonline banking, the chat on the Bank's website for individuals without access to online banking, video chat and online video meetings with experts, a contact form, the helpline with the option to connect directly from the app, as well as traditional Customer Centres. Customers also share their opinions and comments through satisfaction surveys and via social media. Information about available access channels can be found on the Bank's website in the Contact section or obtained at Bank branches or through the helpline.

The contact channels offered by the Bank are diverse and tailored to the different needs of Customers. Based on quarterly analyses of difficulties reported by Customers and shared with product owners, corrective actions are planned to address these needs. The Bank's units apply a multichannel approach and ensure high-quality access – particularly in the area of improving accessibility for persons with special needs. The Bank also operates an Online Expert Centre for Retail Customers in the mortgage area, which is also available to the premium segment. The Centre supports the development of remote services and the transition from branch-based banking to online banking, pursuing the mission of creating a fully remote branch accessible to Customers regardless of their place of residence.

The efficiency of communication channels is assessed based on NPS (Net Promoter Score) surveys, 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.

When conducting surveys of Customers, the Bank follows 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.

Social inclusion

As regards its impact on social inclusion of retail Customers, the Group focuses on increasing the accessibility of its products and services, as described in the section below. The Group relies on the same corrective processes that are used for other retail Customers, which are presented 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 end-users, and effectiveness of those actions (S4-4)

The Group implements various measures to prevent, minimise and correct negative impacts on retail Customers, to manage the associated material risks and to take advantage of the related opportunities.

Transversal training actions

The goal of training for employees provided by the Group is to properly manage key risks and leveraging opportunities related to the service for retail Customers. This includes training on the protection of Customers' interests, most notably an extensive Code of Conduct training, mandatory for all employees and covering information on channels for reporting ethical concerns as well as a module dedicated to diversity, equity and inclusion.

In addition, every employee must complete mandatory privacy protection training, and regular internal campaigns reinforce awareness of cybersecurity threats and the principles of secure data processing.

Actions for personal data protection

Risk management process related to the protection of personal data

The personal data protection policy of the Group and Bank includes identifying, classifying and assessing the risks associated with personal data processing activities affecting data subjects, including retail Customers.

The Group uses a range of organisational and technical measures 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, these measures include:

- pseudonymisation 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

The management of Customer personal data protection is based on the cooperation between the network of Chief Data Officers operating in the first line of defence (Group Data Office) and the Data Protection Officers functioning within the Risk structures as the second line of defence – they are responsible for applying the data protection framework. This network is further supported by legal experts, also within the second line of defence. The functions responsible for ongoing and periodic controls, forming the third line of defence, verify the correct application of this framework and assess its effectiveness.



Channels for dialogue with retail Customers

The Group’s rules, aligned with the GDPR, provide for the direct notification of individuals whose personal data has been affected by a breach. This ensures that Customers can quickly learn about their rights and take actions to enhance their security.

Retail Customers may contact the Bank at any time – directly or through data protection authorities – if they have questions or complaints regarding the processing of their data. The Bank’s suppliers are required to forward any Customer requests and support the Bank in providing responses.

The channels facilitating dialogue with Customers are described in the Data Protection Notices and on the Bank’s website, where guidance on submitting complaints to the President of the Polish Data Protection Authority (UODO) is also available. Complaints are handled confidentially and in accordance with the principle of restricted access.

The dialogue with retail Customers regarding personal data protection is organised 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 dialogue within the Group lies with the teams responsible for managing personal data protection as part of the second line of defence and the management boards of the companies.

Continuous improvement process

In 2025, the Bank continued to expand its network of data protection specialists. The Bank has a team of Data Protection Officers (as part of the second line of defence), 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 handling data protection complaints and incidents is monitored within the Group through ongoing controls carried out by control functions, as well as periodic audits. In addition, this process may be subject to assessment by supervisory authorities and courts, and the contact details of the supervisory authority are provided in the “Personal Data Protection Information Notice” and made available to Customers upon request.

The Group draws conclusions from personal data breach incidents and from interactions with data subjects, in order to improve dialogue channels and more effectively prevent and mitigate future breaches. Where necessary, additional communication with Customers is conducted to clarify their requests or supplement information, enabling the Bank to provide the most accurate response.

Actions for transparent, clear and non-misleading information and complaints management

Clear, transparent and non-misleading information

These actions are described in the section [Processes for engaging with consumers and end-users about impacts \(S4-2\)](#) The Group takes action tailored to the needs of Customer groups, such as formalising guidelines for drawing up contracts or practices to prevent greenwashing.

Complaint management

Details of these activities are presented above in the section [Processes to remediate negative impacts and channels for consumers and end-users to raise concerns \(S4-3\)](#). Information on the complaint handling process and the mediation protocol is provided to Customers both in Customer Centres and on the Bank’s website. A Customer who submits a complaint receives confirmation of its receipt within five business days if the matter is still under review. Customers are kept informed about the progress, and the final response is provided within no more than 60 days.

Continuous improvement process

The analysis of root causes of complaints and the ways in which they are resolved supports the Group’s continuous improvement. Once a quarter, a complaint report is presented at meetings of the Management Board and the Supervisory Board, and issues related to complaints are discussed during regular sessions devoted to the Code of Conduct

The Bank invests in the development of the GObetter complaint system and other tools that support effective complaint management. It also uses compliance procedures to manage risk and ensure the highest quality of services. Customer experiences along sales and service journeys are monitored through Customer Journey studies and NPS surveys, as discussed in the section [Processes for engaging with consumers and end-users about impacts \(S4-2\)](#).

Focus on Customer satisfaction

The following resources are responsible for handling complaints:

- Daily Banking Operations Department and Complaint and Letters Processing Team,
- the Bank’s Customer Ombudsman – a Lead Flow Expert at the Daily Banking Department.

When the Bank identifies an error resulting in a financial loss or undue charges for a Customer, a set of corrective actions is initiated.

- in the case of incorrectly applied fees or commissions, the employee handling the complaint issues a refund as part of the complaint process, and information about the error is forwarded to the relevant product or process owner.
- if the error results in an operational loss, the event is recorded and settled in accordance with the Bank’s Instruction for Recording Operational Events and Action Plans.



When a Customer’s claim is accepted, losses are immediately remedied within the complaint handling process (for example, by cancelling an incorrectly applied fee). Financial losses arising from system failures, process errors or human errors are assigned directly to the managers responsible for the product or process affected by the error.

Actions for Customer satisfaction

The Bank has developed a set of tools designed to identify key issues that may negatively affect Customer satisfaction. These tools enable more effective recognition of Customer expectations and appropriate responses to them. One such tool is the NPS. 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 monitors Customer pain points;
- is a member of internal decision-making teams and represents 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 \(S4-3\)](#), which includes:

- regularly collecting all available feedback from Customers (from surveys, complaints, social networks and other sources).
- in-depth analysis of feedback to identify the key difficulties experienced by Customers and their causes;
- prioritising and jointly solving identified problems with the relevant operational teams.

The Bank implements the following measures to ensure a positive impact on Customers:

- develops processes in digital channels, for example by:
 - enabling Customers to use the “exempt amount” on accounts subject to enforcement seizure via the mobile app and online banking,
 - providing new remote channel processes for mortgage loans, such as shortening the loan term after a partial early repayment and enabling tranche disbursement to the developer;
- improves savings management, for example by introducing the GOdreams service in the Bank’s app, whose functionalities supports Customers in saving regularly for their dream goals while banking with the Bank;
- has introduced a more modern and functional web application for brokerage accounts, called GOwebmakler;
- streamlines credit processes, including by:

- enabling the signing of loan agreements via SMS code and providing an additional identity verification method through the mObywatel app for instalment loans,
- introducing enhancements to the loan agreement signing process in the Bank’s mobile app to increase accessibility for Customers,
- enabling Customers to apply for a cash loan using Open Banking in the phone-based application path;
- simplifies the language of agreements, promotional terms, applications and other documents, including in the credit process and account opening process, to make them even clearer and more understandable for Customers;
- introduces improvements for employees to help them serve Customers more efficiently and effectively, for example by expanding and standardising tools and systems used to process key Customer instructions on the Helpline, as well as for scheduling Customer appointments with Advisors through various channels such as the Customer Centre, Helpline or Video Meeting.

In addition, the Bank takes measures to develop the knowledge and raise the awareness of employees in order to strengthen the organisational culture focused on Customers’ needs. In 2025, the Bank:

- presented the development of Customer paths (i.e. Customer experience maps) for the needs of further owners of products and processes;
- as part of onboarding, trained new leaders in Customer Experience in recognition of the fact that active manager involvement is necessary in building a Customer-centric organisation;
- continued the Advocacy Programme, which covers key aspects of Customer centricity: building awareness of employees about the importance of focusing on the Customer, using knowledge about Customers and employees to improve the Customer experience, and verifying whether the initiatives taken have had the expected results;
- continued the three-module online training course Customer Experience – NPS and made a new training course available to all Bank employees on working with Customer journeys, incorporating both the Customer and employee perspectives;
- developed the Customer Experience Strategy, enabling the creation of consistent and customer-centric solutions;
- organised Customer Days aimed at inspiring employees to design exceptional Customer experiences in line with the Customer Experience Strategy and at emphasising the importance of plain language in communication with Customers;
- appreciated Customers by preparing special offers and vouchers, and by providing financial education through, among other things, educational webinars, conversations on how smart everyday decisions can lead to greater peace of mind and real savings, as well as on children’s online safety; we also made available educational guides for children from the Mission Education series;
- expanded knowledge about the needs of neurodivergent Customers across various Bank areas responsible for designing solutions, digital channels and Customer service through dedicated training, and examined the experiences of neurodivergent Customers in the Bank with the support of external experts specialising in neurodiversity. Based on the



insights gathered, the Bank began improving service standards, processes and solutions to take another step towards more accessible, conscious and responsible banking.

The Bank has advanced risk monitoring systems and anti-fraud programmes in place, and their results are regularly reported to the Management Board.

Through regular assessment and monitoring of its practices, the Bank ensures that they do not cause or contribute to material negative impacts on Customers. The use of the Customer voice in journey analysis enables the precise identification of difficulties Customers encounter. Based on these insights, the Bank adjusts its solutions to better address Customer needs and expectations. One important source of knowledge is the analysis of complaints, which informs the implementation of measures aimed at preventing similar issues from recurring.

Surveys are conducted among Customers acquired through partner channels, and the findings from these analyses are discussed with the Bank units cooperating with partners.

Both the collection of Customer feedback on their experiences with products and service channels, and the subsequent work with such information in the Innerloop and Outerloop processes, enable the implementation of improvements across the Bank’s operations.

The resources that the Bank uses to manage material impacts on Customer satisfaction include the Customer Experience Strategy and Development Department, which is responsible for collecting and analysing Customer feedback from various sources.

Actions for social inclusion to support financial inclusion through accessibility of products and services

Social inclusion holds a particularly important place in the Group’s activities, understood as ensuring that every Customer has equal, convenient and simple access to banking services. This commitment is reflected in the POSITIVE pillar of the Bank’s GObeyond strategy for 2022–2025, which included, among other objectives, ensuring access to banking for all. The Bank engages in initiatives that promote greater accessibility of financial services, diversity and equality, thereby supporting a more inclusive society. Particular emphasis is placed on facilitating access to banking for individuals at risk of social exclusion. Customers with disabilities and seniors can rely on both physical and digital channels offering solutions tailored to their needs. In this way, the Bank mitigates risks related to limited access to financial services and supports Customers in achieving their goals. All access channels are regularly reviewed for functionality and user-friendliness, in line with WCAG guidelines.

Accessibility matters within the Bank are regulated by the document Principles for Providing Banking Documents in Accessible Formats for Customers with Special Needs. The Bank complies with the requirements of the Act on Ensuring Accessibility for Persons with Special Needs and pursues its activities with a long-term perspective.

Accessibility for people with special needs

As at the end of 2025, 144 Customer Centres 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, senior citizens and people looking after children. In practice, this means that Customers can move around the Bank’s premises without obstacles and use the available facilities. The Bank’s strategic objective was to ensure that by 2025 at least 50% of Customer Centres would hold the “Barrier-Free Facility” certificate. At the end of 2025, 41.5% of Customer Centres were certified. The target was not achieved due to cost optimisation decisions regarding the sales network taken during the strategy period. The certification process began in 2018. Adapting the Customer Centres that remained uncertified in 2025 would require significant investment in reconstruction, or they are located in buildings where meeting the certification requirements is very difficult or impossible due to structural or technical constraints. Nevertheless, in the coming years, the Bank will continue its efforts to increase the number of Customer Centres holding the certificate.

All of the Bank’s branches hold the OK Senior® certificate awarded by the National Institute of Senior Economy. The certificate confirms that the solutions offered are senior-friendly and that services are safe, understandable and reliable. In 2023, the Customer Centres obtained recertification for the years 2023–2025 for the third time, following an audit assessing the extent to which services are adapted to the needs of senior customers. The OK Senior® Quality Mark guarantees the credibility and accessibility of services for senior Customers, and the Bank remains the only financial institution in Poland to hold this distinction.

The Bank offers a range of solutions for deaf and hard-of-hearing Customers to facilitate access to financial services across different channels. Assistance from a Polish Sign Language (PJM) interpreter is available in all Customer Centres. Customers can also connect with a PJM interpreter online and book an appointment at a branch in PJM via an online form. A PJM interpreter is also available on the helpline, enabling smooth remote communication. Additionally, the Bank provides visual recordings of documents in PJM, and induction loops supporting hearing-aid users operate in 195 Customer Centres. Customers may also request visual recordings of documents in PJM. Each branch is equipped with a magnifying glass and a signature guide frame for Customers with visual impairments, and the Bank offers contract templates in audio format, large-print versions and in Braille. Thanks to these solutions, deaf and hard-of-hearing Customers can use banking services in a convenient and accessible way, tailored to their needs.

Banking services are also more accessible to Customers with visual impairments thanks to solutions that support safe and independent use of banking. Blind and partially sighted Customers can review documents in audio format, in large-print versions or in Braille. Branches are equipped with magnifying glasses and signature guide frames. Glass elements in Customer Centres are appropriately marked to improve safety and comfort of movement, and ATMs have been adapted for use by partially sighted Customers. In 2025, the number of ATMs equipped with accessibility features for partially sighted or low-vision users – such as enhanced screen contrast – increased to 602 devices. Ninety-six of them were fully compliant with the requirements of the Accessibility Act. In 2025, work began on equipping all ATMs with a voice-guidance function so that the entire network meets the requirements of the Act.

The Bank regularly trains its employees in serving Customers with disabilities and implements the Standards for Serving Customers from Vulnerable Groups. To ensure accessibility of products, services and branches, the Bank cooperates with partner organisations: Dostępność Plus, Fundacja Integracja, Dostępny Bankomat, Krajowy Instytut Gospodarki Senioralnej, Migam “RKPK” Sp. z o.o. S.K.A. and Fundacja DeafRespect.



Digital accessibility

The Bank takes action aimed at increasing the digital accessibility of its services:

- In accordance with the requirements of the Act of 26 April 2024 on ensuring that economic operators meet accessibility requirements for certain products and services, which implements Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services, we submitted reports on the level of service accessibility to national regulators: the Financial Ombudsman and the Ministry of Digital Affairs.
- The Bank cooperates with companies specialising in digital accessibility – Widzialnia and Accens – and plans to establish cooperation with another company, Kinaole. The agreements in place allow, among others, for conducting service audits in line with the WCAG standard as well as commissioning training and expert consultations.
- In 2025, the Bank conducted 10 audits of key digital channel services for Retail Customers.
- A schedule of further work was developed, covering: audits of additional services for Retail Customers, training (including on document accessibility), expert consultations, and activities aimed at improving the accessibility of selected services in digital channels.

Digital accessibility is a highly complex topic, difficult to interpret and requiring open dialogue between national regulators, non-governmental organisations and industry representatives. Therefore, the Bank engages in initiatives in this area:

- we cooperate with the Polish Bank Association to develop a common and consistent interpretation of the Act and to clarify the content of recommendations;
- we participates in the trialogue – meetings aimed at developing recommendations related to the digital accessibility Act. These meetings involve national regulators, NGOs, the Polish Bank Association, representatives of the banking sector and the e-commerce sector;
- we are a member of the Business Accessibility Forum (BAF), a platform for dialogue and cooperation that supports Polish companies in implementing the requirements of the European Accessibility Act.

Plain language

Simplifying the language the Bank uses to communicate with its Customers is one of the important ways to enhance social inclusion. Since 2019, the Bank has followed the plain language standard in its letters, messages, e-mail and text messages, and promotional material. The rules cover communication with all Customer segments, from private individuals to micro-enterprises and corporate Customers, as well as legal texts, including contracts and rules. More about approach to [plain language](#) is presented in the section Filar POSITIVE.

Effectiveness of actions related to the identified negative impacts

The actions described above, divided into topic-specific (transparent and not misleading information, Customer satisfaction, social inclusion) and transversal (training) actions, allow the Bank to effectively prevent, mitigate and correct identified

impacts on retail Customers. By monitoring complaints and NPS, the Group monitors to what extent its actions deliver the expected results for retail Customers.

The Group also ensures the implementation of processes that address all material impacts and verify the effectiveness of corrective actions. This includes assessing whether solutions, such as the response time rules for handling complaints described above, actually deliver the expected results.

The effectiveness of initiatives and actions undertaken in relation to the Group’s key impacts is continuously monitored and evaluated.

By using its internal risk management system and acting in compliance with personal data protection regulations (such as the GDPR and the Regulation on Privacy and Electronic Communications), the Group prevents negative impacts on data subjects in matters related to personal data protection, including areas connected with marketing practices and data use.

The personal data protection risk management process is the foundation of the 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 for data protection](#), such as encryption or pseudonymisation. The Group’s Code of Conduct promotes the highest ethical standards in this regard; in accordance with the Bank’s Personal Data Protection Policy, the Bank does not sell the personal data of its Customers to its business partners.

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 Customers’ propensity to recommend its services. The metric is determined in cooperation with a market research institute. The key goal in the area of Customer satisfaction is to be a TOP3 bank by Net Promoter Score. In 2025, the Bank was in the middle of the ranking (6th place at the end of 2025).

The Bank’s targets regarding its Customers are stable and measurable over time and are defined in the GObeyond strategy for 2022-2025. The strategy was developed internally with the participation of employees representing all key areas of the Bank, subsidiaries and the Customer Experience team and the Customer Ombudsman, who represented the perspective of Customers. The objectives developed under the four pillars of the strategy, including those relating to Customers, are described in detail in the chapter Implementation of the strategy, and the results of the strategy implementation are presented in the section [Strategy, business model and value chain \(SBM-1\)](#) under General Disclosures (ESRS 2). The Bank uses consistent definitions and measurement methodologies, which enables year-on-year comparison of results. Every year, Customers can familiarise themselves with the Bank’s objectives and results by reading the Management Board’s Reports 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 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 assessment. The material impacts, risks and opportunities related to the rules of conduct and other compliance risk topics are presented below in the section: Managing impacts, risks, opportunities (IRO).

Principles: The principles in place to manage material impacts, risks and opportunities in business conduct and to manage compliance risk are described in the section: Business conduct policies and organisational culture (G1-1).

Managing impacts, risks and opportunities (IRO-1)

As a result of the double materiality assessment described under General Disclosures (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 117. Summary of the links between material IROs and policies, actions, metrics and targets

Category	Material IRO	Policies, principles	Actions	Metrics	Targets
Negative impacts	Legal and reputational risks associated with corruption or influence peddling	• Anti Money Laundering and Counter-Terrorist Financing Programme • Policy on reporting suspected irregularities • Gift policy • Anti-corruption policy • Conflict of interest management policy • Code of Conduct	• Know Your Customer (KYC) process • Anti money laundering and counter-terrorist financing / monitoring activity • Reporting of suspicious transactions • Negative information • Business relationship review • Transaction monitoring	• 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
Positive impacts	Impact associated with adherence to values and ethical standards by employees	• Code of Conduct	• Whistleblowing channels – reporting discrimination, violence and mobbing • Corrective measures (disciplinary and support measures, follow-up), RCSA (operational risk and control self-assessment), RiskCare operational risk event records, Development offer of the central programme #MyWay, management training, • Inclusion, diversity and Code of Conduct Group employee survey	• Training and skill development metrics • eNPS at 20 points (2025) • employee Net Promoter Score	N/A



Category	Material IRO	Policies, principles	Actions	Metrics	Targets
Risks	Legal risks associated with not identifying suspicious Customer activity	• Anti Money Laundering and Counter-Terrorist Financing Programme • Sanctions and Embargoes Transaction Verification Rules • Sanctions Policy • BNP Paribas Customer Acceptance Policy (KYC Policy) • Financial Markets Transparency Policy	• Know Your Customer (KYC) process • Anti money laundering and counter-terrorist financing / monitoring activity • Reporting of suspicious transactions • Negative information • Business relationship review • Verification of relations against sanctions	N/A	N/A

Business conduct policies and corporate culture (G1-1)

The table below shows the main policies for managing impacts, risks and opportunities relating to business conduct.

Table 118. Policies adopted regarding business conduct

Policy	Description of policy content	The scope of the policy and 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: • 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	President of the Management Board of BNP Paribas Group	No interaction The Code of Conduct is available via the Bank's intranet and website of the Bank. It is available in Polish and English versions
BNP Paribas Bank Polska S.A. Group Policy on Anyi Money Laundering and Counter-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	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



Policy	Description of policy content	The scope of the policy and possible exclusions	The most senior level in the undertaking's organisation that is accountable for the implementation	Interaction with stakeholders
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	Customer acquisition
Market Integrity Policy	The Policy is a reference for market transparency. It addresses various regulatory issues, in particular: • 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).	Grupa BNP Paribas	Management Board	No interaction

**regulation appropriately implemented in Group subsidiaries in accordance with the principle of proportionality*

The described policies are subject to a monitoring process, as defined in the chapter Corporate Governance, section [Internal control system \(including control and risk management system for the preparation of financial reports\)](#).

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 2025, the Code was updated and aligned with changes in the regulatory, normative and social environment. The fundamental principles of the Code and its anti-corruption appendix remained unchanged; however, we introduced amendments relating in particular to the compliance culture, risk management and the whistleblowing procedure, as well as updates to certain definitions and examples to reflect the evolution of our environment and to incorporate best practices in ethics, integrity and sustainable development. These changes focused primarily on three areas:

- permitted communication channels in the markets, ensuring the integrity of correspondence;
- data protection – in response to the growing importance of cybersecurity and confidentiality;
- alignment with international anti-corruption standards.



In accordance with the BNP Paribas Group Code of Conduct, the Bank requires its employees to comply with specific 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. More details 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, with due diligence, takes 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: “Compliance with 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 any 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 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 others,
- protection of the Group,
- commitment to society;

- “Code of Conduct in Practice”, which provides useful guidance on the application of rules of conduct, including:
 - 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 in of 2025 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).

Managing conduct risk

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 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 makes every effort 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 fiscal information 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 and establish a dedicated expertise area as part of the Compliance function. More information: 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 the standards and comply with the 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 the following:

- 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 practice,

- 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 subcontractor 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,
- violations 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, data processing methods and the protection guaranteed to whistleblowers including against retaliation.

Independent and secure communication channels available to employees and external third parties

The Whistleblowing process is governed 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 others, the communication channels through which potential violations can be reported. The Whistleblowing Policy at BNP Paribas Bank Polska implementing the provisions of the Whistleblower Protection Act was updated in November 2025.

The Bank appointed dedicated Whistleblowing Officers who, while respecting the principles of confidentiality, ensure impartial, independent and prompt 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 provide information in the course of the investigation, persons who assist 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 concerned 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.



Processing alerts

Whistleblowing Officers are responsible for receiving reports and 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 report is analysed and investigated independently using expert knowledge. Reported 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 report 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.

Control

An internal control system is in place to verify that, among others, 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 the Supervisory Board. In 2025, 12 alerts were reported through the Bank’s whistleblowing channels, the same as in 2024.

Training

All topics covered in the Code of Conduct are integrated into a training course called Conduct Journey. It is regularly updated and enriched with topics on whistleblowing channels, diversity, equality and inclusion. The course was last updated in 2025. The training develops the core principles outlined in the Code of Conduct, discusses expected employee behaviour and addresses the issue of detecting and preventing fraud.

New employees, upon joining the Group, are systematically enrolled in financial security training (Know Your Customer, anti-money laundering, counter-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 and security training.

Table 119. “Conduct Journey” training for employees and managers on anti-corruption policies and procedures in 2024 and 2025

year	2025		2024	
Type of training	“Conduct Journey” on conduct – 2025 edition	(Compliance) – anti-bribery and corruption – most exposed employees	“Conduct Journey” on conduct	(Compliance) – anti-bribery and corruption – most exposed employees
Number of employees attending training	6,738	3,018 ⁽¹⁾	7,119	493
Percentage of employees in corruption-exposed roles who completed the training	n/a	44.8%	n/a	6.9%
Type of training	e-learning		e-learning	
Duration and frequency	1.5 h – every year	40 minutes – every two years	1.5 h – every year	40 minutes – every two years
Completion rate	99.9%	98.8%	99.7%	96.8%

(1) In 2025, a larger number of employees were assigned to anti-bribery and anti-corruption training, which is why the percentage of employees in corruption-exposed roles who completed the training is higher. For comparison, the combined percentage of employees in corruption-exposed roles who completed the training in 2024 and 2025 is 48.36%. The data has been adjusted to exclude 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 means of:

- 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 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 policies 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 in relation to 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 three lines of defence, with the business units responsible for first-line controls, the second line of defence carried out by units such as compliance, risk, finance, and audit as 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 Monitoring 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/given, due diligence in establishing

relationships with Customers/contractors/intermediaries, and the level of employee awareness. IT solutions have also been developed 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 Table 118 Policies adopted for business operations.

Training

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 Officers 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 violations of anti-corruption or anti-bribery legislation in the last five years.

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 the 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 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 a Market Integrity Protection Policy, which is a set of key provisions on the principles of financial market transparency. It 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) as well as selected aspects of the MIFID requirements.

The policy addresses issues such as detection and prevention of market abuse (price manipulation, benchmark manipulation 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 persons 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.

Managing impacts, risks and opportunities (IRO)

Monitoring transactions and contributing to the proper functioning and transparency of the markets

In order to protect market integrity and prevent the dissemination or misuse of inside 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 notification (STOR ‘Suspicious Transaction Order Report’) to the relevant regulatory authority (authorities).

The Bank monitors transaction orders in relation to all brokerage activities and fulfils obligations regarding pre- and post-trade transparency and the submission of notifications 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 Market Integrity 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 management information system and the compliance function’s reporting system.

Financial market abuse is reported to the Polish Financial Supervisory Authority in Suspicious Transaction Order Reports (STOR).

The Bank uses IT systems to identify potential fraud in personal transactions or financial market abuse, mechanisms to manage inside information and solutions to identify and manage situations of conflict of interest.

Training

Employees complete mandatory e-learning training, regarding market abuse and personal transactions, which covers topics related to financial market integrity.

In addition, for selected employees of the Ethics and Market Transparency Team who perform tasks strictly related to countering price manipulation, benchmarks or insider trading, additional, more detailed training is provided on topics in the area of market integrity.

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. It constantly adapts to the changing business and regulatory environment by systematically reviewing market trends, changes in Customer assessment profiles and transactions. It takes into account new developments leading to the introduction of funds from illegal sources into financial circulation. It 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 Counter-Terrorist Financing 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”), Know Your Supplier Policy (“KYS Policy”), Policy on relationships with categories of persons or entities other than those indicated above (“KYX Policy”). All of the Bank’s financial security policies are updated on an ongoing basis. The Bank continuously reviews its procedures and instructions, adapting them to the dynamic legal environment, including both domestic regulations and international standards. Ongoing strengthening of financial security helps avoid exposure to risks and ensures full regulatory compliance.

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 involved in suspicious, illegal or unethical activities or put on sanctions lists. 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/CTF 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, reputational risks 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 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 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 preventing 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:

- 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;

- rules on fulfilling obligations involving the transmission of transaction data and notifications to the General Inspector of Financial Information;
- rules on the dissemination of knowledge of the provisions of the Act on preventing money laundering and terrorist financing among employees;
- rules on reporting by employees or other persons performing activities for the Bank on actual or potential violations of the AML/CTF provisions;
- rules on internal control or supervision of the Bank’s compliance with the AML/CTF regulations and the rules of conduct set out in the internal procedure;
- rules on noting discrepancies between the information gathered in the Central Register of Beneficial Owners and the information on the Customer’s beneficial owners;
- rules on 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 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 AML/CTF 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 sanctions imposed by Poland, France, European Union or United States, 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, territories over which Ukraine has lost control due to the Russian aggression (Donetsk, Kherson, Luhansk, Zaporozhe), 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;
- in 2025, the Bank introduced the Russia Questionnaire, which enables the identification of any links to Russia at the level of the Customer as well as their parent company or subsidiaries.



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/CTF 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 relationship,
- close an existing relationship,
- 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.

Managing impacts, risks and opportunities

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 secure the products and processes offered to its Customers. One of the factors mitigating risk exposure is training

Training

The Bank provides comprehensive training programmes for those performing AML/CTF duties. Training includes onboarding training (prior to the commencement of official activities) and regular training 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 competences of employees, thereby reducing the risks to which the Bank and the Group are exposed.

Cybersecurity

General information

In the constantly evolving landscape of the global financial industry, the Group recognises the crucial role of cybersecurity in maintaining operational resilience. The Group faces challenges related to ensuring the security, confidentiality, and integrity of its data, as well as the stability and resilience of its information and communication technology (ICT) systems. The interconnected nature of its operations, combined with the rapid pace of technological advancement and the growing need to rely on external entities to provide critical services, requires a strategic and adaptive approach to risk management. The Group is exposed to cybersecurity risk, including risks arising from malicious and/or fraudulent actions

carried out virtually with the intent to manipulate information (confidential, banking, technical, or strategic data), processes, and users, in order to cause significant losses to the Group.

Regulatory authorities now consider cybercrime 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 organisation needs to consider from the perspective of its business model, operations and value chain. Every successful cyber-attack, system failure, disruption of IT services, confidential data breach impacting the Group or its vendors 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 the double materiality assessment (DMA), cybersecurity risk was estimated on a medium level.

The Bank implemented a third party technology risk management framework that governs ICT risk management with internal and external entities, both in procurement and in partnerships, in line with Group guidelines. The Bank follows a risk-based approach covering identification, assessment, contracting, implementation, monitoring and termination of services. The framework incorporates the requirements of the European Digital Operational Resilience Act (DORA), defines stakeholder responsibilities and introduces appropriate controls, taking into account the level of third party risk as well as the criticality and nature of the services provided.

In 2025, the Bank’s cybersecurity initiatives were recognised both locally and internationally. The Bank received the Cybersecurity Golden Shield award in the Złoty Bankier competition for the highest standards in data protection and digital security. The award was based on an independent audit (RiskRecon, CyberQuant) and an assessment of our cybersecurity education initiatives. BNP Paribas Bank was also the winner of the Forrester’s 2025 Security & Risk Enterprise Leadership Award, recognising its leadership in cybersecurity, customer trust, excellence in security and risk management, and its efforts to empower customers through education and innovation in digital security.

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 is reported to the Bank’s Management Board and Supervisory Board. 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 chairperson. The tasks of these committees include overseeing and controlling the security of the ICT environment, ensuring effective communication, compliance with objectives and needs. The tasks and



working procedures of these committees are governed by 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 the BNP Paribas Group Cybersecurity Programme, strengthening the Agile@Scale digitisation programme and partnerships, extensive sector and cross-sector collaboration, secure use of Open-API collaboration, regulatory compliance.

Particular emphasis is placed on raising the Group’s employees’ awareness of good cybersecurity practices. Each year, employees complete mandatory online training modules, and a set of “golden rules” to be followed within the organisation is regularly shared and updated. Employees are also systematically reminded of the Group’s phishing reporting process to ensure an appropriate level of vigilance and risk awareness at all levels of the company.

The Managing Director of the Security and Business Continuity Management Division (Chief Security Officer) ensures that the management of cyber-security and information and communication technology (ICT) risks is consistent with local regulations and the BNP Paribas Group’s standards. The CSO is responsible for the implementation of appropriate policies, best practice and guidelines, and for the implementation of security requirements defined by the Group under the Cybersecurity Programme. The CSO oversees corrective projects which mitigate identified cybersecurity risks.

Managing impacts, risks and opportunities (IRO-1)

Table 120. Summary of the links between material IROs and policies, actions, metrics and targets

Category	Material IROs	Policy	Actions	Metrics	Targets
Risks	Operational risk caused by cyber attacks	• Information Security Policy • ICT Security Policy	• Framework requirements translated into actions and action plans	• Key Performance Indicators (KPIs) • BNP Paribas Group Cybersecurity Programme. • IT@Scale strategy	• Target maturity broken down by entity under 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 in the Bank

Table 121. Policies adopted in the course of business

Policy	Description of policy content	The scope of the policy and possible exclusions	The most senior level in the undertaking’s organisation that is accountable for the implementation	Dialogue 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,	Bank*	Management Board of the Bank	Internal document



Policy	Description of policy content	The scope of the policy and possible exclusions	The most senior level in the undertaking's organisation that is accountable for the implementation	Dialogue with stakeholders
	Customer-oriented services and maintain a high level of Customer confidence in the Bank.			
ICT Security Policy	Security framework for ICT and ICT-related risk management It consists of a set of documents (policies, recommendations and standards) that define the basic requirements for information security	Bank*	Management Board of the Bank	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 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 standardised approach to mitigating risks. These are aligned with industry best practices. This ensures consistent implementation of processes and associated controls within the Bank, strengthening the overall cybersecurity profile.

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 an Information Security Policy, certified under ISO 27001, an ICT Security Policy and a Business Continuity Management Policy certified under ISO 22301. 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 targets 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 targets by efficiently allocating the scope, applicability, timelines, necessary resources, including human, technological and budget resources. This proactive approach prioritises activities based 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 deadlines for each task to ensure effective execution.

The progress of each cybersecurity target is monitored 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, internal Key Performance Indicators (KPIs) have been implemented in the Bank.

Each year, the Security and Business Continuity Management Division, under the BNP Paribas Group Cybersecurity Programme, takes part in a number of campaigns in order to assess compliance with the BNP Paribas Cybersecurity Programme objectives. The results are announced to management during meetings organised within the 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 of the 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.



Appendix 1

Disclosure Requirements in ESRS covered by the undertaking’s sustainability statement (IRO-2)

Table 122. Disclosure Requirements in ESRS covered by the undertaking’s Sustainability Statement

Disclosure requirements	Page
ESRS 2 General disclosures	135
BP-1 General basis for preparation of sustainability statements	135
BP-2 Disclosures in relation to specific circumstances	157
GOV-1 The role of the administrative, management and supervisory bodies	135
GOV-2 Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	135
GOV-3 Integration of sustainability-related performance in incentive schemes	139
GOV-4 Statement on due diligence	140
GOV-5 Risk management and internal controls over sustainability reporting	141
SBM-1 Strategy, business model and value chain	141
SBM-2 Interests and views of stakeholders	146
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	154
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	150
IRO-2 Disclosure requirements in ESRS covered by the undertaking’s sustainability statement	159
ESRS E1 Climate change	160
E1-1 Transition plan for climate change mitigation	160
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	154
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	150
E1-2 Policies related to climate change mitigation and adaptation	167
E1-3 Actions and resources in relation to climate change policies	170
E1-4 Targets related to climate change mitigation and adaptation	174
E1-5 Energy consumption and mix	175
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	175

Disclosure requirements	Page
E1-7 GHG removals and GHG mitigation projects financed through carbon credits	177
E1-8 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	177
ESRS S1 Own workforce	181
ESRS 2 SBM-2	181
ESRS 2 SBM-3	154
S1-1 Policies related to own workforce	184
S1-2 Processes for engaging with own workers and workers’ representatives about impacts	187
S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	188
S1-4 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	189
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	194
S1-6 Characteristics of the undertaking’s employees	195
S1-7 Characteristics of non-employee workers in the undertaking’s own workforce	196
S1-8 Collective bargaining coverage and social dialogue	197
S1-9 Diversity metrics	197
S1-10 Adequate wages	198
S1-11 Social protection	198
S1-12 Persons with disabilities	198
S1-13 Training and skills development metrics	199
S1-14 Health and safety metrics	199
S1-15 Work-life balance metrics	199
S1-16 Compensation metrics (pay gap and total compensation)	200
S1-17 Incidents, complaints and severe human rights impacts	200
ESRS S4 Consumers and end-users	201
ESRS 2 SBM-2 Interests and views of stakeholders	146
ESRS 2 SBM-3 impacts, risks and opportunities and their interaction with strategy and business model	154



Disclosure requirements	Page
S4-1 Policies related to consumers and end-users	203
S4-2 Processes for engaging with consumers and end-users about impacts	204
S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	205
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	207
S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	211
ESRS G1 Business conduct	212
ESRS 2 GOV-1 The role of the administrative, supervisory and management bodies	135
ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	150
G1-1 Corporate culture and business conduct policies and corporate culture	213
G1-3 Prevention and detection of corruption and bribery	217
G1-4 Confirmed incidents of corruption or bribery	218
Cybersecurity	222
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	223
Market integrity and financial security	219

Table 123. 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 / Not material
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	SFDR Annex I, Commission Delegated Regulation (CDR) (EU) 2020/1816, Annex II	276
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	CDR (EU) 2020/1816, Annex II	258
ESRS 2 GOV-4 Statement on due diligence paragraph 30	SFDR Annex I	140
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)	160
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	CDR (EU) 2020/1818, Article 6	160
ESRS E1-4 GHG emission reduction targets paragraph 34	SFDR Annex I, Commission Delegated Regulation (CDR) (EU) 2020/1816, Article 449a	174
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Not material	Not material
ESRS E1-5 Energy consumption and mix paragraph 37	SFDR Annex I	175
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Not material	Not material
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)	175
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	SFDR Annex I, CDR (EU) 2020/1818, Article 8 (1)	175



Disclosure Requirement and related datapoint	Appendix B – ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in / Not material
ESRS E1-7 GHG removals and carbon credits paragraph 56	Regulation (EU) 2021/1119 Article 2 (1)	177
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	Phase-in application	Phase-in application
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)	Phase-in application	Phase-in application
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)	Phase-in application	Phase-in application
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69	Phase-in application	Phase-in application
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	Not material	Not material
ESRS E3-1 Water and marine resources paragraph 9	Not material	Not material
ESRS E3-1 Dedicated policy paragraph 13	Not material	Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Not material	Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Not material	Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Not material	Not material
ESRS 2 – SBM-3 – E4 paragraph 16 (a) i	Not material	Not material
ESRS 2 – SBM-3 – E4 paragraph 16 (b)	Not material	Not material
ESRS 2 – SBM-3 E4 paragraph 16 (c)	Not material	Not material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Not material	Not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Not material	Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Not material	Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Not material	Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Not material	Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Not material	Not material

Disclosure Requirement and related datapoint	Appendix B – ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in / Not material
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Not material	Not material
ESRS S1-1 Human rights policy commitments paragraph 20	SFRD Annex I,	184
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,	184
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	SFRD Annex I	184
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	SFRD Annex I	184
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	SFRD Annex I	188
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	199
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	SFRD Annex I	199
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	CDR (EU) 2020/1816, Annex II	200
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	SFRD Annex I	200
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	SFRD Annex I	200
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	CDR (EU) 2020/1816, Annex II	200
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Not material	Not material
ESRS S2-1 Human rights policy commitments paragraph 17	Not material	Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	Not material	Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Not material	Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	Not material	Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Not material	Not material



Disclosure Requirement and related datapoint	Appendix B – ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in / Not material
ESRS S3-1 Human rights policy commitments paragraph 16	Not material	Not material
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Not material	Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Not material	Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	SFRD Annex I	203
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,	203

Disclosure Requirement and related datapoint	Appendix B – ESRS 2 (SFDR + Pillar 3 + Benchmark + CL)*	Page / Not applicable / Phase-in / Not material
ESRS S4-4 Human rights issues and incidents paragraph 35	SFRD Annex I,	207
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	SFRD Annex I,	213
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	SFRD Annex I,	213
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)	218
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	SFRD Annex I,	218

* Reference to the Financial Services Sector Sustainability Disclosure Regulation, Pillar 3, the Benchmarks Regulation and the European Climate Law

Appendix 2

Other taxonomic tables as of 31 December 2025

Table 124. Assets for the calculation of GAR – based on turnover KPIs

31.12.2025 PLN'000		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	
		Total [gross] carrying amount	Of which Taxonomy- eligible	Of which Taxonomy- aligned	Breakdown per environmental objective										Non-assessed exposures	Of which financing non- material activities of counterparties (1)	Of which exposures financing counterparties reporting in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution (2)
											Of which Use of Proceeds	Of which transitional	Of which enabling					
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)								
1	GAR - Covered assets in both numerator and denominator	56,965,988	28,582,632	1,471,865	1,470,118	1,744	0	4	0	0	897,726	5	542,104	0	0	0	0	
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	56,965,988	28,582,632	1,471,865	1,470,118	1,744	0	4	0	0	897,726	5	542,104	0	0	0	0	
3	Financial undertakings	2,690,430	1,420,365	186,148	186,145	3	0	0	0	0	0	2	171,604	0	0	0	0	
4	Loans and advances	2,690,430	1,420,365	186,148	186,145	3	0	0	0	0	0	2	171,604	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	
6	Equity instruments	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	
7	Non-financial undertakings	9,706,530	2,507,209	387,991	386,247	1,740	0	4	0	0	0	3	370,500	0	0		0	
8	Loans and advances	9,706,530	2,507,209	387,991	386,247	1,740	0	4	0	0	0	3	370,500	0	0		0	
9	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
10	Equity instruments	0	0	0	0	0	0	0	0	0		0	0	0	0		0	
11	Households	44,538,279	24,655,058	897,726	897,726	0		0			897,726	0	0	0	0		0	
12	of which loans collateralised by residential immovable property	20,060,500	19,880,740	897,726	897,726	0		0			897,726	0	0	0	0		0	
13	of which building renovation loans	803,293	803,293	0	0	0		0			0	0	0	0	0		0	
14	of which motor vehicle loans	4,263,684	3,971,025	0	0							0	0	0	0		0	



31.12.2025 <	
---	--

(1) In accordance with Article 7(8)(a) and (b) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 4(1a) of Commission Delegated Regulation (UE) 2026/73; (3) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 125. Assets for the calculation of GAR – based on CapEx KPIs

31.12.2025		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p			
		Total [gross] carrying amount	Of which Taxonomy- eligible	Of which Taxonomy- aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non- material activities of counterparties (1)	Of which exposures financing counterparties reporting in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution (2)		
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)										
1	GAR - Covered assets in both numerator and denominator	56,965,988	28,922,788	2,023,346	2,023,041	18	0	12	0	274	897,726	274	932,961	0	0	0	0			
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	56,965,988	28,922,788	2,023,346	2,023,041	18	0	12	0	274	897,726	274	932,961	0	0	0	0			
3	Financial undertakings	2,690,430	1,434,738	429,276	429,264	8	0	0	0	5	0	5	357,511	0	0	0	0			
4	Loans and advances	2,690,430	1,434,738	429,276	429,264	8	0	0	0	5	0	5	357,511	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			
6	Equity instruments	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0			
7	Non-financial undertakings	9,706,530	2,832,992	696,343	696,051	10	0	12	0	269	0	269	575,450	0	0		0			
8	Loans and advances	9,706,530	2,832,992	696,343	696,051	10	0	12	0	269	0	269	575,450	0	0		0			
9	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0			
10	Equity instruments	0	0	0	0	0	0	0	0	0		0	0	0	0		0			
11	Households	44,538,279	24,655,058	897,726	897,726	0		0			897,726	0	0	0	0		0			
12	of which loans collateralised by residential immovable property	20,060,500	19,880,740	897,726	897,726	0		0			897,726	0	0	0	0					
13	of which building renovation loans	803,293	803,293	0	0	0		0			0	0	0	0	0					
14	of which motor vehicle loans	4,263,684	3,971,025	0	0						0	0	0	0	0					
15	Local governments financing	30,750	0	0	0	0	0	0	0	0	0	0	0	0	0		0			
16	Housing financing	0	0	0	0	0		0	0	0	0	0	0	0	0		0			
17	Other local government financing	30,750	0	0	0	0	0	0	0	0	0	0	0	0	0		0			
18	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0		0	0	0	0	0	0	0	0		0			
19	Exposures included on a voluntary basis (3)	0	0	0	0	0		0	0	0	0	0	0	0	0	0				
20	Total GAR assets	56,965,988															0	0	0	0
21	Assets not covered for GAR calculation	126,085,388																		
22	Central governments and Supranational issuers	50,444,677																		
23	Central banks exposure	9,882,448																		
24	Trading book	2,172,644																		
25	Undertakings and entities not subject to CSRD	45,340,124																		
26	SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations	35,088,140																		
27	Loans and advances	34,892,330																		
28	of which loans collateralised by commercial immovable property	17,040,733																		



31.12.2025 	
--	--

(1) In accordance with Article 7(8)(a) and (b) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 4(1a) of Commission Delegated Regulation (UE) 2026/73; (3) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 126. Assets for the calculation of the GAR in relation to flows – based on turnover.

31.12.2025 PLN'000		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	
		Total [gross] carrying amount	Of which Taxonomy- eligible	Of which Taxonomy- aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non- material activities of counterparties (1)	Of which exposures financing counterparties reporting in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution (2)
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)								
1	GAR - Covered assets in both numerator and denominator	13,089,017	4,832,331	562,834	562,834	0	0	0	0	0	471,335	0	90,785	0	0	0	0	
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	13,089,017	4,832,331	562,834	562,834	0	0	0	0	0	471,335	0	90,785	0	0	0	0	
3	Financial undertakings	40,011	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
4	Loans and advances	40,011	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	
6	Equity instruments	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	
7	Non-financial undertakings	1,687,295	249,440	91,499	91,499	0	0	0	0	0	0	0	90,785	0	0		0	
8	Loans and advances	1,687,295	249,440	91,499	91,499	0	0	0	0	0	0	0	90,785	0	0		0	
9	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
10	Equity instruments	0	0	0	0	0	0	0	0	0		0	0	0	0		0	
11	Households	11,352,307	4,582,891	471,335	471,335	0		0			471,335	0	0	0	0		0	
12	of which loans collateralised by residential immovable property	2,597,255	2,589,614	471,335	471,335	0		0			471,335	0	0	0	0		0	
13	of which building renovation loans	103,004	103,004	0	0	0		0			0	0	0	0	0		0	
14	of which motor vehicle loans	1,890,273	1,890,273	0	0						0	0	0	0	0			
15	Local governments financing	9,403	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0
16	Housing financing	0	0	0	0	0		0	0	0	0	0	0	0	0		0	0
17	Other local government financing	9,403	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0
18	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
19	Exposures included on a voluntary basis (3)	0	0	0	0	0		0	0	0	0	0	0	0	0	0	0	0
20	Total GAR assets	13,089,017												0	0	0	0	
21	Assets not covered for GAR calculation	26,959,456																
22	Central governments and Supranational issuers	13,511,338																
23	Central banks exposure	2,198,779																
24	Trading book	534,259																
25	Undertakings and entities not subject to CSRD	5,952,579																
26	SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations	4,841,326																
27	Loans and advances	4,824,532																
28	of which loans collateralised by commercial immovable property	1,950,848																
29	of which building renovation loans	57,941																
30	Debt securities	16,794																



31.12.2025 <	
---	--

(1) In accordance with Article 7(8)(a) and (b) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 4(1a) of Commission Delegated Regulation (UE) 2026/73; (3) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 127. Assets for the calculation of the GAR in relation to flows – based on capital expenditure (CapEx)

31.12.2025 	
--	--



31.12.2025 	
--	--

(1) In accordance with Article 7(8)(a) and (b) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 4(1a) of Commission Delegated Regulation (UE) 2026/73; (3) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 128. GAR sector information - based on turnover KPIs

a		b	c	d	e	f	g	h	i	j
31.12.2025 Breakdown by sector - NACE 4 digits level (PLN'000)		Total [Gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1	77.11 - Rental and leasing of cars and light motor vehicles	1,993,336	1,387,142	123,557	123,557	0	0	0	0	0
2	61.20 - Telecommunication reselling activities and intermediation service activities for telecommunication	1,134,944	0	0	0	0	0	0	0	0
3	60.39 - Other content distribution activities	560,491	0	0	0	0	0	0	0	0
4	35.11 - Production of electricity from non-renewable sources	380,211	0	0	0	0	0	0	0	0
5	46.32 - Wholesale of meat, meat products, fish and fish products	284,520	0	0	0	0	0	0	0	0
6	61.10 - Wired, wireless, and satellite telecommunication activities	280,673	0	0	0	0	0	0	0	0
7	46.64 - Wholesale of other machinery and equipment	269,099	0	0	0	0	0	0	0	0
8	24.42 - Aluminium production	210,674	67,416	50,773	50,773	0	0	0	0	0
9	28.92 - Manufacture of machinery for mining, quarrying and construction	203,121	66,547	66,547	66,547	0	0	0	0	0
10	86.92 - Patient transportation by ambulance	171,207	0	0	0	0	0	0	0	0
11	Nuclear activities (1)	763,673	371	371						
12	Fossil gas activities (2)	770,066	123	0						
13	Of which non-assessed exposures (3)	0								

(1) Referred to in Sections 4.26, 4.27 and 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139; (2) Referred to in Sections 4.29, 4.30 and 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139.; (3) In accordance with Article 7(8) of Commission Delegated Regulation (UE) 2026/73.



Table 129. GAR sector information – based on capital expenditure (CapEx)

a		b	c	d	e	f	g	h	i	j
31.12.2025 Breakdown by sector - NACE 4 digits level (PLN'000)		Total [Gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1	77.11 - Rental and leasing of cars and light motor vehicles	1,993,336	1,496,921	416,039	416,039	0	0	0	0	0
2	61.20 - Telecommunication reselling activities and intermediation service activities for telecommunication	1,134,944	0	0	0	0	0	0	0	0
3	60.39 - Other content distribution activities	560,491	0	0	0	0	0	0	0	0
4	35.11 - Production of electricity from non-renewable sources	380,211	0	0	0	0	0	0	0	0
5	46.32 - Wholesale of meat, meat products, fish and fish products	284,520	0	0	0	0	0	0	0	0
6	61.10 - Wired, wireless, and satellite telecommunication activities	280,673	0	0	0	0	0	0	0	0
7	46.64 - Wholesale of other machinery and equipment	269,099	0	0	0	0	0	0	0	0
8	24.42 - Aluminium production	210,674	47,612	46,138	46,138	0	0	0	0	0
9	28.92 - Manufacture of machinery for mining, quarrying and construction	203,121	112,400	112,400	112,400	0	0	0	0	0
10	86.92 - Patient transportation by ambulance	171,207	0	0	0	0	0	0	0	0
11	Nuclear activities (1)	763,111	428	428						
12	Fossil gas activities (2)	1,063,040	296	0						
13	Of which non-assessed exposures (3)	0								

(1) Referred to in Sections 4.26, 4.27 and 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139; (2) Referred to in Sections 4.29, 4.30 and 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139.; (3) In accordance with Article 7(8) of Commission Delegated Regulation (UE) 2026/73.



Table 130. GAR KPI stock – based on turnover KPIs

31.12.2025 % (compared to corresponding total covered assets in the denominator)		a	b	c	d	e	f	g	h	i	j	k	l	m
		Taxonomy-eligible	Taxonomy- aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non- assessed exposures (1)
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)					
1	GAR - Covered assets in both numerator and denominator	50.17%	2.58%	2.58%	0.00%	0.00%	0.00%	0.00%	0.00%	1.58%	0.00%	0.95%	5.15%	0.00%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	50.17%	2.58%	2.58%	0.00%	0.00%	0.00%	0.00%	0.00%	1.58%	0.00%	0.95%	5.15%	0.00%
3	Financial undertakings	52.79%	6.92%	6.92%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6.38%	13.11%	0.00%
4	Loans and advances	52.79%	6.92%	6.92%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6.38%	13.11%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
7	Non-financial undertakings	25.83%	4.00%	3.98%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.82%	15.48%	0.00%
8	Loans and advances	25.83%	4.00%	3.98%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.82%	15.48%	0.00%
9	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
11	Households	55.36%	2.02%	2.02%	0.00%		0.00%			2.02%	0.00%	0.00%	3.64%	0.00%
12	of which loans collateralised by residential immovable property	99.10%	4.48%	4.48%	0.00%		0.00%			4.48%	0.00%	0.00%	4.52%	0.00%
13	of which building renovation loans	100.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
14	of which motor vehicle loans	93.14%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%
15	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
19	Exposures included on a voluntary basis (2)	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	
20	GAR - Total GAR assets	50.17%	2.58%	2.58%	0.00%	0.00%	0.00%	0.00%	0.00%	1.58%	0.00%	0.95%	5.15%	0.00%

(1) In accordance with Article 7(8) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 131. GAR KPI stock – based on capital expenditure (CapEx)

31.12.2025 % (compared to corresponding total covered assets in the denominator)		a	b	c	d	e	f	g	h	i	j	k	l	m
		Taxonomy-eligible	Taxonomy- aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non- assessed exposures (1)
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)					
1	GAR - Covered assets in both numerator and denominator	50.77%	3.55%	3.55%	0.00%	0.00%	0.00%	0.00%	0.00%	1.58%	0.00%	1.64%	7.00%	0.00%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	50.77%	3.55%	3.55%	0.00%	0.00%	0.00%	0.00%	0.00%	1.58%	0.00%	1.64%	7.00%	0.00%
3	Financial undertakings	53.33%	15.96%	15.96%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13.29%	29.92%	0.00%
4	Loans and advances	53.33%	15.96%	15.96%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13.29%	29.92%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
7	Non-financial undertakings	29.19%	7.17%	7.17%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.93%	24.58%	0.00%
8	Loans and advances	29.19%	7.17%	7.17%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.93%	24.58%	0.00%
9	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
11	Households	55.36%	2.02%	2.02%	0.00%		0.00%			2.02%	0.00%	0.00%	3.64%	0.00%
12	of which loans collateralised by residential immovable property	99.10%	4.48%	4.48%	0.00%		0.00%			4.48%	0.00%	0.00%	4.52%	0.00%
13	of which building renovation loans	100.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
14	of which motor vehicle loans	93.14%	0.00%	0.00%			0			0.00%	0.00%	0.00%	0.00%	0.00%
15	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
19	Exposures included on a voluntary basis (2)	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	
20	GAR - Total GAR assets	50.77%	3.55%	3.55%	0.00%	0.00%	0.00%	0.00%	0.00%	1.58%	0.00%	1.64%	7.00%	0.00%

(1) In accordance with Article 7(8) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 132. GAR KPI flow – based on turnover KPIs

31.12.2025 % (compared to corresponding total covered assets in the denominator)		a	b	c	d	e	f	g	h	i	j	k	l	m	
		Taxonomy-eligible	Taxonomy- aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non- assessed exposures (1)
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)						
1	GAR - Covered assets in both numerator and denominator	36.92%	4.30%	4.30%	0.00%	0.00%	0.00%	0.00%	0.00%	3.60%	0.00%	0.69%	11.65%	0.00%	
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	36.92%	4.30%	4.30%	0.00%	0.00%	0.00%	0.00%	0.00%	3.60%	0.00%	0.69%	11.65%	0.00%	
3	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	
7	Non-financial undertakings	14.78%	5.42%	5.42%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.38%	36.68%	0.00%	
8	Loans and advances	14.78%	5.42%	5.42%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.38%	36.68%	0.00%	
9	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	
11	Households	40.37%	4.15%	4.15%	0.00%		0.00%			4.15%	0.00%	0.00%	10.28%	0.00%	
12	of which loans collateralised by residential immovable property	99.71%	18.15%	18.15%	0.00%		0.00%			18.15%	0.00%	0.00%	18.20%	0.00%	
13	of which building renovation loans	100.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%	
14	of which motor vehicle loans	100.00%	0.00%	0.00%								0.00%	0.00%	0.00%	0.00%
15	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%	
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
18	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%	
19	Exposures included on a voluntary basis (2)	0.00%	0.00%	0.00%	0.00%		0.00%				0.00%	0.00%	0.00%	0.00%	
20	GAR - Total GAR assets	36.92%	4.30%	4.30%	0.00%	0.00%	0.00%	0.00%	0.00%	3.60%	0.00%	0.69%	11.65%	0.00%	

(1) In accordance with Article 7(8) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 133. GAR KPI flow – based on CapEx KPIs

31.12.2025 % (compared to corresponding total covered assets in the denominator)		a	b	c	d	e	f	g	h	i	j	k	l	m	
		Taxonomy-eligible	Taxonomy- aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non- assessed exposures (1)
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)						
1	GAR - Covered assets in both numerator and denominator	36.86%	4.13%	4.13%	0.00%	0.00%	0.00%	0.00%	0.00%	3.60%	0.00%	0.53%	11.22%	0.00%	
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	36.86%	4.13%	4.13%	0.00%	0.00%	0.00%	0.00%	0.00%	3.60%	0.00%	0.53%	11.22%	0.00%	
3	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	
7	Non-financial undertakings	14.30%	4.13%	4.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.13%	28.89%	0.00%	
8	Loans and advances	14.30%	4.13%	4.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.13%	28.89%	0.00%	
9	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	
11	Households	40.37%	4.15%	4.15%	0.00%		0.00%			4.15%	0.00%	0.00%	10.28%	0.00%	
12	of which loans collateralised by residential immovable property	99.71%	18.15%	18.15%	0.00%		0.00%			18.15%	0.00%	0.00%	18.20%	0.00%	
13	of which building renovation loans	100.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%	
14	of which motor vehicle loans	100.00%	0.00%	0.00%								0.00%	0.00%	0.00%	0.00%
15	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%	
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
18	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%	
19	Exposures included on a voluntary basis (2)	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20	GAR - Total GAR assets	36.86%	4.13%	4.13%	0.00%	0.00%	0.00%	0.00%	0.00%	3.60%	0.00%	0.53%	11.22%	0.00%	

(1) In accordance with Article 7(8) of Commission Delegated Regulation (UE) 2026/73; (2) In accordance with Article 7(3) of Commission Delegated Regulation (UE) 2026/73;



Table 134. KPI off-balance sheet exposures - based on turnover KPIs (stock)

31.12.2025 % (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy eligible	Taxonomy aligned	Breakdown per environmental objective								Non- assessed exposures (1)	
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)	Of which Use of Proceeds	Of which transitional		Of which enabling
1	Financial guarantees (FinGuar KPI)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2	Assets under management (AuM KPI)	5.91%	0.63%	0.62%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32%	0.00%

Table 135. KPI off-balance sheet exposures - based on CapEx KPIs (stock)

31.12.2025 % (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy eligible	Taxonomy aligned	Breakdown per environmental objective								Non- assessed exposures (1)	
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)	Of which Use of Proceeds	Of which transitional		Of which enabling
1	Financial guarantees (FinGuar KPI)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2	Assets under management (AuM KPI)	8.13%	1.07%	1.04%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08%	0.40%	0.00%

Table 136. KPI off-balance sheet exposures - based on turnover KPIs (flow)

31.12.2025 % (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l	
		Taxonomy eligible	Taxonomy aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Non- assessed exposures (1)
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)					
1	Financial guarantees (FinGuar KPI)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
2	Assets under management (AuM KPI)	7.17%	0.55%	0.81%	-0.26%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.36%	0.00%	



Table 137. KPI off-balance sheet exposures - based on CapEx KPIs (flow)

31.12.2025 % (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l	
		Taxonomy eligible	Taxonomy aligned	Breakdown per environmental objective								Non- assessed exposures (1)		
											Of which Use of Proceeds		Of which transitional	Of which enabling
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)					
1	Financial guarantees (FinGuar KPI)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
2	Assets under management (AuM KPI)	13.54%	0.08%	0.04%	0.02%	0.00%	0.02%	0.00%	0.00%	0.00%	0.16%	0.68%	0.00%	

(1) In accordance with Article 7(8) of Commission Delegated Regulation (UE) 2026/73.



Disclaimer

This Sustainability Statement has been prepared in accordance with the requirements of the CSRD (and its transposition into Polish law) and the European Sustainability Reporting Standards (ESRS) applicable on the date of publication of this statement, as well as Commission Delegated Regulation (EU) 2025/1416 of 10 November 2025, which defers the application of selected disclosure requirements. Changes to sustainability reporting obligations were initiated by the European Commission as part of the “omnibus package” aimed at simplification.

Given the persisting uncertainty regarding the future shape of applicable regulations, the Group has adopted a prudent approach and made every effort to reflect the specific nature of its operations and to provide the most reliable and adequate information possible.

This document includes only the information that the Group considers material in terms of both the impact of the Group’s activities on people and the environment and/or the impact of sustainability matters on the Group. It presents the methodological choices that formed the basis of the Group’s double materiality assessment of environmental, social and governance matters. Some information collected by the Group has not been included in this statement due to its lower materiality, although it may still carry a certain degree of relevance.

Use of assumptions and estimates

Where certain information, particularly relating to the Group’s value chain, is not yet widely available or does not meet sufficient reliability standards, the preparation of this statement is partly based on reasonable assumptions and estimates, in line with CSRD requirements. Some of these assumptions or estimates may involve a high degree of measurement uncertainty. They have been presented to the extent that they provide useful and meaningful insights. In such cases, the narrative description includes the methods and definitions applied, as well as any related limitations and uncertainties.

To ensure high quality disclosures, the Group has, where possible, relied on definitions derived from European regulations and recognised standards. Where this was not feasible, information has been prepared in good faith, based on internal definitions and estimates.

Information, data, metrics and methodologies used to describe climate change continue to evolve. Climate-related metrics are complex and rely on numerous assumptions regarding climate policy, technology and other uncertain or unknown factors. Any change in these variables may render the underlying assumptions, and therefore the resulting climate metrics and data, inaccurate. Consequently, climate-related information included in the sustainability statement, whether historical or forward-looking, carries inherent uncertainty and may be less relevant for decision-making than historical financial data.

Forward-looking statements

In accordance with the CSRD, this statement contains forward-looking information, including projections and estimates based on current views and assumptions regarding future events. The Group cannot provide any assurance that these projections or estimates will be achieved. They are subject to inherent risks and uncertainties, some of which are beyond the Group’s control, relating in particular to the Group itself, its subsidiaries and investments, the development of its business, industry trends, future investments and acquisitions, as well as changes in economic, social, ecological and environmental conditions and applicable regulations.

Due to these risks and uncertainties, forward-looking statements should not be regarded as a representation or guarantee by the Group or any other person that the Group will achieve its objectives, plans, intentions or metrics within a specified timeframe or at all.

Uncertainty inherent in climate-related information

Any forward-looking statements contained in this statement refer only to the date on which they were made. The Group does not undertake to publish updates or revisions to such statements unless required by applicable law.

With respect to greenhouse gas emissions, there is no full standardisation or comparability of estimation and calculation methods due to the diversity of available frameworks and methodologies. As a result, there remains a risk of over- or under-estimation of indicators.

Scope 3 emissions, particularly those related to financed Customers, are characterised by high measurement uncertainty. By definition, these emissions arise from the activities of the Group’s Customers and, unlike the Group’s direct emissions, depend on external factors beyond the Group’s control.

Third-party information

Some statistical information and other data included in this statement have been obtained from external sources. The Group accepts no liability for such information and makes no representations or warranties regarding its accuracy, precision or completeness.



Corporate governance

Management Board's Statement of compliance
with corporate governance principles

- 246** Compliance with corporate governance principles in 2025
- 253** Shares and shareholders
- 255** Statutory bodies of the Bank
- 274** Remuneration of the Management Board and the Supervisory Board
- 276** Diversity policy
- 278** Internal control system (including control and risk management system for the preparation of financial reports)
- 279** Information about the auditor



Compliance with corporate governance principles in 2025

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 function holders, 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 set out in the documents: "Best Practice for WSE Listed Companies", "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 Articles of Association, the BNP Paribas Group Code of Conduct, adopted in the latest version by Supervisory Board Resolution 45/2025 on 28 May 2025, and internal policies that reflect the regulatory requirements of corporate governance.

Pursuant to § 72(7)(5) of the Regulation of the Minister of Finance dated 6 June 2025 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 2025, item 755), the Management Board of BNP Paribas Bank Polska S.A. presents the following information regarding compliance with corporate governance principles in 2025.

The applicable set of corporate governance principles which the Bank is subject to

Corporate Governance Principles for Supervised Institutions

The Bank is subject to the "Corporate Governance Principles for Supervised Institutions" issued by the Polish Financial Supervision Authority 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 Polish Financial Supervision Authority at:
https://www.knf.gov.pl/dla_rynku/regulacje_i_praktyka/zasady_ladu_korporacyjnego.

The "Corporate Governance Principles for Supervised Institutions" were adopted by the Bank's Management Board and Supervisory Board in December 2014 and by the General Meeting in February 2015. The Bank's position on the compliance with 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.

The Bank's annual statement of compliance with 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.

The section below presents a review of compliance with the "Corporate Governance Principles for Supervised Institutions" by topic according to the chapters of the Principles.

Principles set out in Chapter 1. "Organisation and organisational structure"

As regards the principles set out 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 the whistleblowing procedure for anonymous reporting of irregularities to the Bank's bodies.

1. The Bank's organisation makes it possible to achieve long-term goals among others by 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 targets both at the level of the Bank and in the individual areas. Organisational changes in the Bank are subordinate to the Bank's strategy and are an important tool for achieving strategy targets. The simplification of the management structure makes it possible to increase sales potential, improve information flow, manage processes and their quality more strongly and consistently, and increases employee engagement 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, among others, 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 rules reflect the organisational structure of the Bank. The Bank's organisational structure is part of the Bank's Organisational Rules, the Head Office's organisational structure is an appendix to the Head Office Rules, and the



organisational charts of the units are an integral part of the rules 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", 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 GObeyond Strategy 2022-2025. 2025 was the last year of implementation of the GObeyond Strategy. As of 2026, the Bank is implementing a new strategy approved by the Bank's Supervisory Board on 10 December 2025 for a 2026-2030 "Accelerate 2030" whose, a public version 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 it 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 holding key functions in the Bank" ensure that persons suitable for the tasks defined in the Organisational Rules are appointed to all 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 retaliation.

10. The Business Continuity Planning System (BCPS) 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 Planning System was audited for compliance with ISO 22301:2019. The Certificate obtained certifies the compliance of the implemented and functioning Business Continuity Planning System with the requirements of ISO 22301.

Principles set out in Chapter 2. "Relationship with shareholders of the supervised institution"

As regards the principles set out in this chapter, the Bank ensures, in particular, an adequate flow of information between the supervised institution and the shareholders and, in accordance with the principles adopted for application, provides a basis for the shareholders' actions.

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), 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 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 (GM) are governed by the Bank's Articles of Association and the General Meeting Rules. 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 at the General Meeting using electronic means of communication.

3. The Bank is obliged by the Banking Law to maintain the equity of the supervised institution at an appropriate level. The Bank's strategic shareholder has made an investor commitment to the Polish Financial Supervision Authority 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 and updated in 2025, provide among others that: the general objective 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; 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 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 Polish Financial Supervision Authority.

Principles set out in Chapter 3. "Managing body"

With regard to the principles set out 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 managing body. The indicators of the organisation's security regarding the level of capital or liquidity are included within the #Stronger pillar of the GObeyond strategy for 2022-2025 and in the new strategy "Accelerate 2030" for 2026-2030 in the Streamline pillar. In the long term, security is ensured through a policy of sustainable and high-quality growth, at the expense of its dynamics. This aims to limit the cost of credit risk, but also to minimise environmental, social or reputational risks that could generate deferred costs, affecting long-term stability and predictability. The members of the management body 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 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 Law, the performance of which has been entrusted to external entities pursuant to Articles 6a-6d of the Banking Law, 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 are adopted on all matters which require the collegial action of the Management Board pursuant to the Bank's Articles of Association, generally applicable laws, supervisory recommendations and separate internal regulations of the Bank. Meetings of the Bank's Management Board are 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 bodies includes questionnaires for assessing a 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, among others, during the periodic assessment of the individual and collective suitability of members of the Bank's Management Board.

Principles set out in Chapter 4. "Supervisory body"

With regard to the principles set out in this chapter, the Bank pays attention in particular to the principles relating to the exercise of day-to-day oversight responsibilities by the Supervisory Board.

1. Supervisory Board meetings are convened as and when required, but at least once in each quarter of the financial year. In 2025, there were 19 meetings of the Supervisory Board and 12 meetings of the Audit Committee. Supervisory Board meetings are held in Polish or, with the consent of all Supervisory 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 may, in particular: 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 provides 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 reports 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.

Principles set out in Chapter 5. "Remuneration policy"

With regard to the principles set out in this chapter, the Bank, among others, pays 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. 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 holding 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 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 Persons 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: income, operating expenses, the Bank's cost of risk, tax charges, cost-to-income ratio and return on equity, 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 set out in Chapter 6. "Information policy"

The principles set out in this chapter are implemented at the Bank primarily in accordance with the Information Policy of BNP Paribas Bank Polska SA.

1. The Information Policy BNP Paribas Bank Polska S.A. governs 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 set out in Chapter 7. "Promotional activities and customer relations"

With regard to the principles set out in this chapter, in addition to the principles related to advertising communications, the Bank pays particular attention to the principles 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' competences in accordance with the development programmes in force at the Bank (induction 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 its compliance with the adopted principles, including the "Rules for the creation of marketing materials at BNP Paribas Bank Polska S.A.". and the "Principles for acceptance of marketing materials and other communications to customers".

Principles set out in Chapter 8. "Key internal systems and functions"

With regard to the principles set out in this chapter, the Bank fully complies with 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 based on three lines of defence model and is adapted to the organisational structure. The Bank's internal control system relies 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 of compliance risk, as well as defining the responsibilities of the Bank's employees in managing compliance 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 annually selects the essential processes based on the criteria adopted by the Bank and documents 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 in 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 Monitoring Division) are set out in the Regulation 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 Rules on the operation of the Compliance Monitoring Division and the Compliance Policy at BNP Paribas Bank Polska SA.

9. The internal control system includes an internal audit function as the third 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 Management Board of the Bank 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 Division 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.

Principles set out in Chapter 9. "Exercise of rights from assets acquired at the customer's risk"

The principles set out in this chapter are implemented by BNP Paribas Bank Polska Brokerage Office based, among others, 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 "Rules 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".

Best Practice for WSE Listed Companies

The corporate governance rules of the "Best Practice for WSE Listed Companies 2021" ("Best Practice", "DPSN 2021"), adopted by the Warsaw Stock Exchange Supervisory Board by Resolution No. 13/1834/2021 of 29 March 2021, came into force on 1 July 2021.

The content of the Best Practice 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 under the "Best Practice for WSE Listed Companies 2021". Subsequently, the Extraordinary General Meeting of the Bank adopted for application the principles contained in the "Best Practice for WSE Listed Companies 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 of compliance with the corporate governance principles pursuant to the provisions of § 72(7)(5) of the Regulation of the Minister of Finance of 6 June 2025 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.

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 WSE Reporting System (EBI until 2025, currently WSE Data), with reports on compliance with the corporate governance principles.

Information on compliance with the "Best Practice for WSE Listed Companies" including all EBI reports (currently WSE Data 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 compliance with the "Best Practice for WSE Listed Companies 2021" at the Bank is subject to constant review. As at the date of publication of this Report, the Bank complies with all the principles set out in the "Best Practice for WSE Listed Companies 2021".

Pursuant to the obligations arising from the provisions of the Warsaw Stock Exchange Rules and the standards resulting from the content of the corporate governance principles: "Best Practices for WSE Listed Companies 2021", below 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. The Press Officer and employees of the PR Team are responsible for cooperation and representing the Bank in its contacts with the media and opinion makers. 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 section) is the primary communication tool: <https://www.bnpparibas.pl/relacje-inwestorskie> (English version: <https://www.bnpparibas.pl/investor-relations>).

2. The operating strategy of BNP Paribas Bank Polska S.A. in 2025 was the GO beyond Strategy for 2022-2025, adopted by the Management Board and the Supervisory Board in March 2022. The main objective of this strategy was to continue the



dynamic development of the Bank as an institution that operates efficiently, with committed employees and satisfied customers, while being a leader in activities that support sustainable development.

3. The new strategy of the BNP Paribas Bank Polska S.A. Group for 2026-2030 “Accelerate 2030” was approved by the Supervisory Board of the Bank on 10 December 2025. The Bank plans further growth in retail and corporate banking segments. The Bank will focus on technology innovation, especially based on AI, as well as the cost discipline. The Bank remains strongly committed to its values: a close combination of economic, social and environmental objectives is a key part of the strategy. These objectives are defined in the IMPACT pillar (one of three pillars of the Bank’s new strategy). The plan is to sell PLN 25 billion new sustainability-linked loans.

Under the new strategy, the Bank plans to finance a broad range of investments in energy transition and decarbonisation in all key customer segments, with a focus on energy efficiency in the industry and real estate, the development of renewable energy sources and low-carbon transportation. The Bank will continue to focus on ESG risk management, reduction of the carbon footprint of the loan portfolio and continued decarbonisation of own operations. In the agro-food sector, where the Bank remains the financing leader, the priority is to support sustainable transition of the entire value chain, in particular by leveraging regenerative agriculture practices. With this approach, the Bank will remain the first choice partner of professional farmers, especially in financing their energy transition with renewable energy sources, such as agrivoltaics, biogas and biomethane.

A presentation of the Bank’s “Accelerate 2030” Strategy 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 will be presented on the Bank’s website, including periodic reports (including the Management Board’s Activity Report).

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 ESG (E – environmental, S – social, G – governance) factors, including the implementation of strategic sustainability objectives, is exercised by the Management Board headed by the CEO. The Management Board approves the direction and scope of activities, and gives its opinion on and supervises the integration of sustainability activities. Sustainability tasks are carried out by the Sustainability and Agrobusiness 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, the Executive Director of the Area 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 pay based on homogeneous groups of employees (created by area of

employment and grade level). The indicator is published in the annual Management Board Report and on the Bank’s annual report website. Under the GObeyond Strategy 2022-2025, the Bank planned a further reduction of the GPG ratio to below 4%. At the end of 2025, the pay gap, as expressed by the Gender Pay Gap indicator, was 3.7%. This means that men’s pay was 3.7% higher than that of women in comparable positions. The indicator is a weighted average of the size of the different employee groups.

2. MANAGEMENT BOARD AND SUPERVISORY BOARD

- 1. The Supervisory Board exercises ongoing oversight of the Bank’s activities across all areas of its operations. The Supervisory Board of BNP Paribas Bank Polska S.A. operates on the basis of the provisions of the Banking Law, the Commercial Companies Code, as well as the Bank’s Articles of Association and the Rules of the Supervisory Board. The Articles of Association and the Rules are available on the Bank’s website.
- 2. The Management Board is the Bank’s managing and executive body, operating in accordance with applicable legal regulations, the Bank’s Articles of Association and the Rules of the Management Board.
- 3. 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 holding key functions at BNP Paribas Bank Polska S.A., which was adopted by the Supervisory Board on 8 December 2022.
- 4. 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 implements the diversity policy in practice, 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, counted separately. As at the end of 2025, the proportion of women on the Supervisory Board is 50% and the proportion of women on the Management Board is 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. At the end of 2025, the share of women in Senior Managerial Positions (managing director, executive director, tribe leader) was 42%.
- 5. Detailed information on the statutory bodies of the Bank and 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 and based on a model of three lines of defence. 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 Bank’s internal control system is based on a set of control mechanisms that ensure the achievement of the internal control system objectives defined 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, and the Bank’s compliance with legal regulations, internal rules and market standards).

2. The compliance unit within the internal control system is appropriately positioned and treated as a key element (alongside the control function) in ensuring compliance within the Bank. Within the internal control system, the internal audit unit acts as the third line of defence and is responsible, among other tasks, for assessing the adequacy and effectiveness of the management system, in particular the risk management system and the internal control system, through audit tasks carried out as part of the audit process defined by the Bank.
3. The internal control system is governed by the Internal Control Rules. In addition, the Bank has developed and adopted a Compliance Policy, which defines the key areas associated with compliance risk as well as the responsibilities of Bank employees in managing this risk.
4. The Bank’s risk management system includes:
 - an organisational structure defining the responsibilities and tasks of the bodies, committees and organisational units of the Bank’s Head Office/Bank units involved in the risk-management system,
 - policies and procedures specifying detailed principles for identifying, measuring, accepting, controlling, monitoring and reporting risk,
 - tools such as the IT system, data warehouses, databases and IT applications supporting the risk management process.

4. GENERAL MEETING AND RELATIONS WITH SHAREHOLDERS

1. The Bank enables shareholders to participate and vote at 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 allows direct participation of media representatives. Recordings of the proceedings are posted on the Bank’s website – Investor Relations/General Meetings section.
2. The Bank responds to inquiries from shareholders within deadlines that comply with the applicable legal standards.
3. On 15 April 2025, the Annual General Meeting of the Bank adopted a resolution on the payment of dividends from the net profit made in 2024. Based on this resolution, the Bank paid a dividend of PLN 1,162,340,659.26, i.e. PLN 7.86 per share. The dividend covered all shares issued by the Bank, i.e. 147,880,491 shares. The dividend record date was set for 22 April 2025 and the dividend payment date for 9 May 2025.
4. Detailed information on the activity of the General Meeting in 2025 is presented under "Statutory bodies of the Bank".

5. CONFLICTS OF INTEREST AND RELATED PARTY TRANSACTIONS

1. Members of the Management Board and of the Supervisory Board 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 Supervisory Board, a member of the body does 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 is 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 practice. This means that it may be changed in a situation where market practice differs from the principles adopted by BNP Paribas Bank Polska S.A.
4. The Bank does not operate a management stock 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 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, 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 complied in 2025 with the corporate governance principles set out in the "Corporate Governance Principles for Supervised Institutions" and the standards set out in the "Best Practice for WSE Listed Companies". No non-compliance with the corporate governance principles reported by the Bank was identified in the period covered by this report.



Shares and shareholders

Shareholding structure

The table below shows the Bank’s shareholding structure as at 31 December 2025, including shareholders who held at least 5% of the total number of votes at the General Meeting.

Table 138. Shareholding structure as at 31 December 2025

shareholder	number of shares	% of share capital	number of votes at the General Meeting	% of the total number of votes at the General Meeting
BNP Paribas, total:	110,910,367	75.00%	110,910,367	75.00%
<i>BNP Paribas directly</i>	<i>75,420,141</i>	<i>51.00%</i>	<i>75,420,141</i>	<i>51.00%</i>
<i>BNP Paribas Fortis SA/NV directly</i>	<i>35,490,226</i>	<i>24.00%</i>	<i>35,490,226</i>	<i>24.00%</i>
Other	36,970,124	25.00%	36,970,124	25.00%
Total	147,880,491	100.00%	147,880,491	100.00%

As of 8 April 2024, the Bank’s share capital amounts to PLN 147,880,491. The capital consists of PLN 147,880,491 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,
- I series - 28,099,554 shares,
- J series - 2,500,000 shares,
- K series - 10,800,000 shares,
- L series - 49,880,600 shares,
- M series - 322,859 shares,
- N series - 138,714 shares.

Four series B shares are preference shares. The preference includes the right to receive payment of the full nominal amount per share in the event of 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 preference, may not cover the nominal amount of these shares.

The total number of votes attached to all the Bank’s shares is 147,880,491. The number of votes resulting from the Series M Shares allocated in 2025 is 20,223 votes and from the Series N Shares is 60,398 votes.

Changes in shareholder structure in 2025

Table 139. Shareholding structure as at 31 December 2024

shareholder	number of shares	% of share capital	number of votes at the General Meeting	% of 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>
Other	27,675,478	18.72%	27,675,478	18.72%
Total	147,799,870	100.00%	147,799,870	100.00%

- **On 7 April 2025**, the Bank’s share capital was increased from PLN 147,799,870 to PLN 147,820,093 as a result of the acquisition of 20,223 series M shares of the Bank in exercise of rights from previously acquired series A5 subscription warrants.
- **On 8 April 2025**, the Bank’s share capital was increased from PLN 147,820,093 to PLN 147,880,491 as a result of the acquisition of 60,398 series N shares of the Bank in exercise of rights from previously acquired series B2 subscription warrants.
- **On 16 December 2025**, as a result of the settlement of block trades concluded on 12 December 2025 in connection with the completion of the accelerated book building for 9,214,025 shares of the Bank, the share of BNP Paribas SA in the total number of votes at the Bank’s general meeting decreased by approximately 6.23%.

BNP Paribas SA directly holds 75,420,141 shares in the Bank representing (as at 31 December 2025) approximately 51.00% 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 110,910,367 shares in the Bank representing (as at 31 December 2025) approximately 75.00% of the total number of shares and votes in the Bank.

Detailed information on the acquisition of the series M and N shares and the accelerated book building are presented in the section: Abut us, Key corporate events.

BNP Paribas’ intention regarding the liquidity of the Bank’s shares

BNP Paribas SA’s intention to increase the number of the Bank’s free float shares to at least 25% was fulfilled in December 2025 with the sale of 9,214,025 Bank shares by BNP Paribas S.A. The details of the transaction are presented in the section: Abut us, Key corporate events.

Bank shares held by members of the Management Board and members of the Supervisory Board

A summary of the Bank’s shares and share entitlements held by the members of the Bank’s Management Board and Supervisory Board as at the date of the report for 2025 (5 March 2026) and the Financial Statements for the third quarter of 2025 (6 November 2025) is presented below.

Table 140. 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 6.11.2025	subscription warrants ¹ 6.11.2025	sale/purchase of shares	shares 5.03.2026	subscription warrants ¹ 5.03.2026
Przemysław Gdański	47,646 ²	8,203	-14,146	33,500 ²	8,203
André Boulanger ³	-	5,163	-	-	5,163
Małgorzata Dąbrowska	-	1,208	-	-	1,208
Wojciech Kembłowski	-	3,590	-	-	3,590
Piotr Konieczny	455	1,571	-	455	1,571
Magdalena Nowicka	2,392	2,632	-	2,392	2,632
Volodymyr Radin	1,364	2,333	-	1,364	2,333
Agnieszka Wolska ⁴	6,538	2,905	-	6,538	2,905
Natalie Yacoubian ⁵	-	-	-	-	-

Member of the Bank’s Supervisory Board	shares 6.11.2025	subscription warrants ¹ 6.11.2025	sale/purchase of shares	shares 5.03.2026	subscription warrants ¹ 5.03.2026
Jean-Charles Aranda	-	770	-	-	770

1) subscription warrants taken up on 24.03.2025: series A6 – one series A6 warrant entitles to take up one series M ordinary bearer share of BNP Paribas Bank Polska S.A., at the issue price of PLN 1.00 per share and B3 series – one series B3 warrant entitles to take up one series N ordinary bearer share of BNP Paribas Bank Polska S.A., at the issue price of PLN 1.00 per share

2) registered pledge was established on 18,000 shares of the Bank held by Przemysław Gdański, at a price of PLN 111.50 per share

3) André Boulanger resigned as a member of the Bank’s Management Board as of 31 December 2025; the share holding balance as at 31 December 2025 is presented at the date of the 2025 Report (5 March 2026)

4) Agnieszka Wolska resigned as a member of the Bank’s Management Board as of 2 January 2026; the share and subscription warrant holding balance as at 2 January 2026 is presented at the date of the 2025 Report (5 March 2026)

5) Natalie Yacoubian has been a member of the Bank’s Management Board as of 1 January 2026

The other members of the Supervisory Board did not declare their shareholding/entitlements in the Bank as at 5 March 2026, which has not changed since the submission of the Q3 2025 Financial Statements (6 November 2025).



Statutory bodies of the Bank

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 Articles of Association and the Rules 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 annual and extraordinary General Meetings. Annual General Meetings are 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 General Meeting decides on the following matters:

- 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 Articles of Association,
- 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 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 amount of 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 convenes 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 is announced at the time of publication of the Notice convening the General Meeting.

The Annual General Meeting of the Bank was held on **15 April 2025**, 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 Board Report on the Bank's activities (including the Sustainability Report of the BNP Paribas Bank Polska S.A. Group for 2024),
- decided on distribution of the profit from 2024 in the amount of PLN 2,320,798 thousand, of which PLN 1,162,341 thousand was allocated to dividend payments, PLN 658,457 thousand to reserves, and the remaining amount was left as retained earnings,
- discharged the members of the Management Board and Supervisory Board for the performance of their duties in 2024,
- adopted a resolution on periodic assessment of the individual and collective suitability of the members of the Supervisory Board,
- adopted a resolution on assessment of the adequacy of the Bank's internal regulations concerning the functioning of the Supervisory Board and the effectiveness of its operations,



- adopted a resolution approving the report submitted by the Supervisory Board of the Bank on the independent evaluation of the functioning of the remuneration policy at BNP Paribas Bank Polska S.A. in 2024,
- adopted a resolution approving an opinion on the report of the Supervisory Board on remuneration of the members of the Supervisory Board and the Management Board of BNP Paribas Bank Polska S.A. in 2024,
- adopted resolutions approving the individual assessment of suitability of a candidate for member of the Supervisory Board of BNP Paribas Bank Polska S.A. and on changes to the Supervisory Board of BNP Paribas Bank Polska S.A.,
- adopted a resolution on the collective assessment of suitability of the Supervisory Board of BNP Paribas Bank Polska S.A. in connection with changes to the Supervisory Board,
- adopted a resolution on determination of remuneration of members of the Supervisory Board of BNP Paribas Bank Polska S.A.,
- adopted resolutions on amendments to the Bank’s Articles of Association and on approval of the consolidated text of the Articles of Association of BNP Paribas Bank Polska S.A.,
- adopted a resolution on the use of reserves capital of BNP Paribas Bank Polska S.A.

An Extraordinary General Meeting of the Bank was held on 27 November 2025, which, in addition to resolutions of a procedural nature:

- adopted a resolution on amendments to the Articles of Association of BNP Paribas Bank Polska S.A.,
- adopted a resolutions on approval of the consolidated text of the Articles of Association of BNP Paribas Bank Polska S.A.

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 Rules of the Bank’s General Meeting and derive from the provisions of the Commercial Companies Code. The following are the most important shareholder rights:

- each 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,
- each shareholder has the right to participate in the General Meeting and exercise his/her voting rights in person or by proxy,
- each 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",
- each 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,
 - 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 appoint the Chairperson of this meeting,
 - each shareholder has access to the list of shareholders. He or she 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 or her by e-mail,
 - each 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,
 - each 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,
 - each shareholder has the right to demand a secret ballot,
 - each 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 (action to repeal a resolution or action to declare a resolution invalid),
 - each 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.

Procedure for amending the Bank’s Articles of Association

Any amendment to the Bank’s Articles of Association 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 Articles of Association also requires a permit from the Polish Financial Supervision Authority, as provided for in Article 34(2) of the Act of 29 August 1997 – Banking Law (consolidated text Journal of Laws of 2016, item 1988, as amended). Motions of the Bank’s Management Board regarding amendments to the Bank’s Articles of Association, 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 Articles of Association, 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 Articles of Association), increase or decrease of the Bank’s share capital, issue of convertible bonds and bonds with the pre-emptive right to acquire the Bank’s shares, as well as subscription warrants, and liquidation or dissolution of the Bank, 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 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(2) of the Bank’s Articles of Association).

Pursuant to the provisions of § 20(1)(1)(m) of the Bank’s Articles of Association, immediately after the General Meeting adopts resolutions introducing amendments to the Bank’s Articles of Association, the Supervisory Board determines the consolidated text of the Bank’s Articles of Association 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 Articles of Association in 2025

1. Pursuant to **Resolution 36 of the AGM of 15 April 2025**, the Bank’s Articles of Association were amended as follows:

- In the existing § 5 para. 3 item 16), the following phrase shall be deleted:
“provide services in respect of transport of cash values”
- In the existing § 5 para. 3 item 19), the following phrase shall be deleted:
“trade in fiscal marks and numismatic values”
- The existing § 5 para. 3 item 20) shall read as follows:
“issue electronic identification means within the meaning of the Act on Trust Services and Electronic Identification”
- In the existing § 6 item 2), the following phrase shall be deleted:
“contract credits and cash loans”
- In the existing § 6 item 5), the following phrase shall be deleted:
“implement, on its own or in cooperation with other entities, other business undertakings both in Poland and abroad”
- In the existing § 6 item 6), the following phrase shall be deleted:
“use distinguishing trademarks to mark offered services”
- In the existing § 6 item 7), the following phrase shall be deleted:
“provide training services”
- The existing § 12 para. 1 item 1) shall read as follows:
“examine and approve the report of the Management Board of the Bank on the Bank’s operations, including sustainability reporting and financial statements for the previous financial year,”
- The existing § 12 para. 1 item 2) shall read as follows:

“examine and approve the activity report of the Management Board of the Bank on the Bank’s group, including sustainability reporting and consolidated financial statements of the group for the previous financial year,”

- The existing § 20 para. 1 item 1 sec. g) shall read as follows:
“appointment of an audit firm to audit the Bank’s financial statements, consolidated financial statements of the Group and the attestation of sustainable development reporting,”
- The existing § 20 para. 1 item 1) sec. j) shall read as follows:
“giving consent to conducting operations the purpose of which is to contract a liability or dispose of assets with the total value in relation to one entity exceeding 10% of shareholders’ equity, with the exception of banking operations referred to in § 5 para. 2, operations referred to in § 6 para. 1 item 3, and contracting lombard loans,”
- The existing § 20 para. 1 item 2) sec. a) shall read as follows:
“evaluation of the report of the Management Board of the Bank on the Bank’s operations, including sustainability reporting and the Bank’s financial statements for the previous financial year, as regards their compliance with books of accounts and documents, as well as the facts, evaluation of the motions of the Management Board of the Bank concerning the profit distribution or loss coverage,”
- The existing § 20 para. 1 item 2) sec. b) shall read as follows:
“evaluation of the report on operations, including sustainability reporting and financial statements for the previous financial year for the Bank group, as regards their compliance with books of accounts and documents, as well as the facts,”
- The existing § 20 para. 6 shall read as follows:
“The majority of the Audit Committee members fulfil conditions of independence stipulated in the Act on Statutory Auditors, Audit Firms and Public Oversight, and at least one of them has qualifications knowledge and skills in accounting or auditing of financial statements or attestation of sustainability reporting. The above independence requirement is deemed satisfied if the terms and conditions set forth in this paragraph are fulfilled by persons specified in § 16 para. 4.”
- The existing § 22 para. 2 item 2a) shall read as follows:
“acceptance of the report on the activity of the Bank, including sustainability reporting, Bank’s financial statements and report on the activity of the Group, including sustainability reporting and consolidated financial statements of the Group,”
- The existing § 22 para. 3 shall read as follows:
“The resolution of the Management Board mentioned in para. 2 item 12 is not required in the event of providing bank services determined in § 6 item 3), plus taking out lombard loans.”
- The existing § 28 shall read as follows:
“The bank’s own funds are the sum of Common Equity Tier I capital, Additional Tier I capital and Tier II capital.”



- The existing § 32 shall read as follows:

"1. Additional capital is established from net profit deductions in a financial year and a surplus obtained at issuing shares above their nominal value, remaining after covering the costs of issuance, from additional capital payments made by shareholders in exchange for assigning special rights to their existing shares without increasing the share capital.

2. Reserve capital is established from net profit deductions in a financial year, earmarked for covering the balance sheet loss and other purposes or expenditures.

3. The general risk fund is earmarked for unidentified risk related to banking operations and is established from net profit deductions in the amount resolved by the General Meeting.

4. Special purpose funds may be established from net profit deductions on the basis of resolutions of the General Meeting. The General Meeting, when establishing a special purpose fund, determines its purpose.

5. The General Meeting decides on the use of the supplementary and reserve capitals, and a part of the supplementary capital in the amount of one-third of the share capital may be used only to cover balance sheet losses.

6. The following are allocated to cover the balance sheet loss:

- 1) Reserve capital,
- 2) Supplementary capital,
- 3) General risk fund for unidentified risk related to banking operations,
- 4) Special purpose funds indicated in para. 4, if they are established."

2. Pursuant to **Resolution 3 of the EGM of 27 November 2025**, the Bank's Articles of Association were amended as follows:

- The existing § 28 shall read as follows:

"1. The bank's own funds in a prudential sense are the sum of Common Equity Tier I capital, Additional Tier I capital and Tier II capital.

2. The bank's own funds in an accounting sense include:

- 1) share capital (paid-up and registered),
- 2) reserve capital,
- 3) revaluation capital,
- 4) AT1 capital bonds,
- 5) general risk fund for unidentified risk of banking operations,
- 6) valuation adjustment fund,
- 7) undistributed profits from previous years,

8) profit in the process of approval and net profit of the current reporting period, calculated in accordance with applicable accounting standards,

9) specific funds, if established."

- The existing § 33 shall read as follows:

"1. The internal regulations of the Bank are issued by:

- 1) Bank bodies in the form of resolutions,
- 2) Members of the Management Board in the form of circular letters or other internal legal acts, and
- 3) Persons holding positions specified in the methodology of internal legislation, in the form of circular letters or other internal legal acts.

2. The detailed principles and methods of issuing internal regulations within the Bank and also scope and types of such regulations, are defined in the internal legislative methodology resolution of the Management Board of the Bank."

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 as well as the Bank's Articles of Association and the Rules of the Supervisory Board. The Articles of Association and the Rules 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 2025, the Supervisory Board consists of 12 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 expires 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 also occurs as a result of resignation, dismissal and death.

The Supervisory Board exercises constant supervision over the Bank's activities in all aspects of its operation. In particular, it evaluates the Management Board 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. It assesses the Management Board's proposals for the distribution of profit or coverage of loss. 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 financial statements, 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 assesses the risk management system, compliance assurance and the internal audit function. It also assesses compliance with the principles of corporate governance, the functioning of the remuneration policy and the suitability policy on the appointment of members of the Management Board and 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 Supervisory 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 orders 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 Articles of Association (§ 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 2025, five members of the Supervisory Board met these criteria: Lucyna Stańczak-Wuczyńska, Monika Kaczorek, Małgorzata Chruściak, Jacques Rinino, and Mariusz Warych.

As at 31 December 2025, following changes to the composition of the Supervisory Board made in 2025, five members of the Supervisory Board met these criteria: Lucyna Stańczak-Wuczyńska, Monika Kaczorek, Małgorzata Chruściak, Bożena Leśniewska, and Jacques Rinino. 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 Supervisory 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 141. Composition of the Bank’s Supervisory Board and Supervisory Board Committees as at 31 December 2025, including information on the independence of the members

			COMMITTEES OF THE SUPERVISORY BOARD			
No.	Name	Function on the Supervisory Board	Audit Committee	Risk Committee	Remuneration Committee	Nominations Committee
1.	Lucyna Stańczak-Wuczyńska	Chairperson, independent member	member	member	Chairperson	Chairperson
2.	Francois Benaroya	Vice-Chairperson		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	Chairperson			
7.	Bożena Leśniewska*	independent member				
8.	Vincent Metz	member				
9.	Piotr Mietkowski	member				
10.	Khatleen Pauwels	member				
11.	Jacques Rinino	independent member	member	Chairperson		
12.	Mariusz Warych	member	member	membe		

** on 15 April 2025, the Annual General Meeting of the Bank appointed Bożena Leśniewska as an independent member of the Supervisory Board of the Bank as of 15 April 2025*

Table 142. Composition of the Bank’s Supervisory Board and Supervisory Board Committees as at 31 December 2024, including information on the independence of the members

			COMMITTEES OF THE SUPERVISORY BOARD			
No.	Name	Function on the Supervisory Board	Audit Committee	Risk Committee	Remuneration Committee	Nominations Committee
1.	Lucyna Stańczak-Wuczyńska	Chairperson, independent member	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*	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 Monika Kaczorek as an independent member of the Supervisory Board of the Bank as of 3 July 2024*



Changes in the composition of the Bank’s Supervisory Board in 2025:

- on 15 April 2025, the Annual General Meeting of the Bank appointed Ms Bożena Leśniewska as Independent Member of the Bank’s Supervisory Board as of 15 April 2025 until the end of the current five-year joint term of office of the members of the Supervisory Board,
- on 28 April 2025, Mr Mariusz Warych announced his resignation as Chairperson of the Audit Committee of the Supervisory Board as of 28 June 2025,
- on 6 May 2025, Mr Francois Benaroya announced his resignation as Member of the Audit Committee of the Supervisory Board as of 28 June 2025,
- on 7 May 2025, the Supervisory Board appointed Ms Monika Kaczorek as Chairperson of the Audit Committee of the Supervisory Board and Mr Jacques Rinino as Member of the Audit Committee of the Supervisory Board as of 28 June 2025.

The competences and professional experience of the members of the Bank’s Supervisory Board are presented on the Bank’s website <https://www.bnpparibas.pl/o-banku/rada>.

In 2025, 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 19 meetings in 2025, of which 15 were in writing. The Bank’s Supervisory Board adopted 85 resolutions. The attendance rate of the Supervisory Board members at meetings was 96.4%.

In 2025, the Supervisory Board fulfilled its duties, which derive from the law and the Bank’s Articles of Association. These duties are set out in the "Framework Work Plan of the Supervisory Board and the Committees operating at the Supervisory Board for 2025". 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.

Table 143. Individual activity of Supervisory Board members in 2025*

Lucyna Stańczak-Wuczyńska	Francois Benaroya	Khatleen Pauwels	Małgorzata Chruściak	Bożena Leśniewska	Vincent Metz
19/19	19/19	19/19	18/19	13/14	19/19
Piotr Mietkowski	Mariusz Warych	Monika Kaczorek	Jean-Charles Aranda	Sophie Heller	Jacques Rinino
18/19	19/19	19/19	18/19	16/19	18/19

* 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 management board members and of key function holders (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 programme 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. From 2008 as Country Director of the EBRD in Poland. From 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 Transylvania, 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 Cabinet of the Minister 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. In 2025, he took part in a number of training courses covering sustainability.



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 Djazair 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. He was a member of the Audit Committee participating, among others, in relations with the auditor, evaluation of the financial statements of funds and sustainability reporting of the TFI. 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. 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. 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. She took part in the EY Corporate Reporting Forum 2024 and #ESGONBOARDS focusing on selected ESG factors for supervisory board members. In 2025, she participated among others in the Supervisory Board Forum which discussed cybersecurity and ESG.



5. 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. She took part in the following sustainability events: LfC Cambridge High Intensity Session on Positive Impact Business, LfC Shape the Future – Mastering Sustainable Finance – A Cambridge Senior Executive Program.



6. Monika Kaczorek – Independent Member of the Supervisory Board

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 as Chairperson 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 Listed Companies 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. She leads training courses for auditors and ESG reporting officers. She is authorised to provide assurance of sustainability reporting. She took part in conferences and webinars on sustainable finance, emission management and DEI held by Chapter Zero Poland, the Association of Independent Members of Supervisory Boards and the Polish Chamber of Statutory Auditors.



7. **Bożena Leśniewska – Independent Member of the Supervisory Board**

She holds an MA in Polish philology from the Jagiellonian University of Kraków. She completed several post-graduate programmes including the Leadership Psychology Academy at the Business School of the Warsaw University of Technology, ESG at Collegium Civitas, and business programmes at the University of Lyon and Cranfield University, Advanced Management at INSEAD and Strategic Leadership for Executives at HEC, Paris. For most of her 30+ years professional career, she has been involved in the telecom industry. She joined DHL International Ltd. in 1992. From 1996, she was responsible for sales at Polkomtel S.A. She joined Orange Polska at PTK Centertel in 2006 as Deputy Director for Business Market Sales and then Director for Business Client Sales. From 2008, she was Director for Business Clients and then Sales Director at PTK Centertel and Telekomunikacja Polska SA responsible for the sales strategy and commercial performance. She completed the integration of B2C and B2B sales structures and created one of the biggest and most diverse sales networks in Poland. She was then responsible for digital transition at Orange Polska. Since 2017, as Vice-President of the Management Board of Orange Polska, she is responsible for the business market and for the subsidiaries Integrated Solutions, BlueSoft and Craftware. She is a member of the Responsible Leadership Board of the Responsible Business Forum, the Think Tank Strategic Board, the Orange Foundation Board. She is a member and former President of the LiderShe association, an active mentor in mentoring programmes including the Vital Voices Foundation and the Perspektywy Foundation, and the co-founder of Europe's first women's university programme, the Kozminski University Women Leadership Academy. She completed a post-graduate programme in sustainability, the Green Academy at Collegium Civitas. She is a certified mentor holding an EMCC advanced level certificate. In 2025, she completed the Exponential Leadership Program Singularity University Poland.



8. **Vincent Metz – Member of the Supervisory Board**

Graduate 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. During his career 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. He oversees BNP Paribas Personal Finance in six countries. He 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. As Chairperson of the Board of Directors of BNP Paribas South Africa Ltd, he was active in the Small Enterprise Foundation (SEF, South Africa's biggest microfinancing institution for women) working for the poor and aiming to create an environment supporting those suffering exclusion from financial services. He completed the programme designed for BNP Paribas: Cambridge Judge Business School Executive Education (Mastering Sustainable Finance).



9. **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 affairs. 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. He took part in many training programmes covering sustainability, including Excellence in Sustainable Finance Transactions, ESG Risks, Inclusive Leadership.



10. **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. She also led the IT team for Outsourcing and Pre-Sales. From 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 (Customer Service Centre) and a member of the Executive Committee of BNP Paribas Fortis. In 2024, she was certified in the programme "Shaping the Future: Sustainable Finance" at Cambridge Judge Business School.



Executive Education. In connection with her new role as Vice-President for Compliance (as of June 2024), she has been certified in compliance.

11. Jacques Rinino – Independent Member of the Supervisory Board



Jacques Rinino completed his second degree (MA) 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 Committee and the 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, an 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 BORGNIS CONSEIL, a financial and corporate services consultancy, since 2016. For more than 15 years, he has been a member of the management board of an organisation for people with disabilities (Delos Apei 78).

12. Mariusz Warych – 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 of 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 UKRSIBBANK in Ukraine and Signal Iduna Polska. 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 strategic 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. In 2024, he completed a series of training courses at the Association of Listed Companies focusing on ESG and sustainability reporting.

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 31 December 2025 and as at 31 December 2024 is presented in Tables 141 and 142 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. These include a risk assessment of the areas it oversees and evaluation of 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 Articles of Association, 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 the resignations made on 28 June 2025 by Mariusz Warych as Chairperson of the Audit Committee and Francois Benaroya as member of the Audit Committee, the Supervisory Board decided on 7 May 2025 to appoint Monika Kaczorek as Chairperson of the Audit Committee and Jacques Rinino as member of the Audit Committee as of 28 June 2025.

Composition of the Audit Committee as at 31 December 2025:

- Monika Kaczorek – Chairperson of the Committee (independent member)
- Jean-Charles Aranda – member of the Committee
- Jacques Rinino – member of the Committee (independent member)
- Mariusz Warych – member of the Committee
- Lucyna Stańczak-Wuczyńska – member of the Committee (independent member)

All members of the Audit Committee have adequate knowledge, competence and many years of experience in the financial and accounting areas:

- **Monika Kaczorek** – Chairperson of the Committee, member of the Committee since 15 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 Listed Companies and a member of the Chapter of the Best Annual Report Competition.
- **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.
- **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.

- **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.
- **Jacques Rinino** – graduate of the Pantheon Sorbonne University of Paris, economist, with the BNP Paribas Group since 1976. He has held a number of management positions in the Group’s global structure throughout his career, including as Group Head of Commercial Banking and Private Banking at BNP Paribas China and Hong Kong, Head of Corporate Banking Risk for Europe, Mediterranean, Middle East and Africa at BNP Paribas Head Office, 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. Long-time member of Supervisory Boards, Audit Committees and Risk Committees of subsidiaries in the international BNP Paribas Group

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,
- 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 2025, 12 Audit Committee meetings were held, six of them by written procedure

The Committee discussed among others the following:

- financial statements for 2024,
- Management Board report on the activity of the BNP Paribas Bank Polska S.A. Group in 2024 (including the Management Board report on the activity of BNP Paribas Bank Polska S.A. in 2024 and the Sustainability Report of the BNP Paribas Bank Polska S.A. Group for 2024),
- quarterly and half-yearly reports on financial performance in 2025,
- 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 PFSA recommendations,
- SREP results,
- annual and periodic reports on complaints 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 units of the company,
- information on the Bank’s compliance with the "Best Practice for WSE Listed Companies 2021" and the financial information communication process in 2024,
- annual reports on the operation of the compliance oversight system in the Brokerage Office and the Custody Services Department,
- 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. The Committee discussed and reviewed updated regulations in the areas of accounting, auditing and compliance and recommended them to the Supervisory Board for adoption.

In 2025, 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 100%. 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 cooperation with the auditor follows the "Policy on the selection of the audit firm at BNP Paribas Bank Polska S.A.", the "Procedure for selecting the audit firm at BNP Paribas Bank Polska S.A.", and 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", which set out such rules to ensure that the selection of the audit firm is carried out correctly and in accordance with the applicable legislation, maintaining the independence of the audit firm and the key auditor, ensuring

the application of transparent and non-discriminatory evaluation criteria for the selection of the audit firm during the tender process, and ensuring that the principles of appropriate rotation of audit firms and the key auditor are maintained, including waiting 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 tax policy, following an analysis of independence and approval of their provision.

The "Policy on the selection of the audit firm at BNP Paribas Bank Polska S.A." and the "Procedure for selecting the audit firm at BNP Paribas Bank Polska S.A." were updated in September 2025. The key amendments to the Policy and the Procedure follow from the Act of 6 December 2024 amending the Act on Statutory Auditors, Audit Firms and Public Supervision and certain other Acts and include an update of the definitions and a modification of the regulatory text, and the addition of provisions on sustainability reporting assurance.

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" was updated in December 2025. The amendments follow from the Act of 6 December 2024 amending the Act on Statutory Auditors, Audit Firms and Public Supervision and certain other Acts and clarify the applicable principles, and otherwise follow from modifications to the organisational structure of the Bank.

The Supervisory Board, based on the recommendations of the Audit Committee, adopted the following resolutions regarding the selection of the audit firm:

- On 15 September 2023, Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. was selected—by resolution of the Supervisory Board—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 reporting packages, for the years 2024–2025.
- On 22 September 2025, Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. was selected to provide assurance services on the Bank’s and the Group’s sustainability reporting for 2025.
- On 10 December 2025, Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. was selected to audit and review the financial statements and to provide assurance services on sustainability reporting for the years 2026–2029.

The audit firm Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. provided the following authorised non-audit services to the Bank in 2025 regarding assurance in relation to:

- Statement of remuneration of the Supervisory Board and the Management Board for 2024,



- compliance of qualitative and quantitative information on the capital adequacy of the Bank’s Group as at 30 June 2025 and 31 December 2024 in accordance with the CRR.
- an external audit of Input Data for the following benchmarks: WIBID/WIBOR (for the period from 17 June 2023 to 16 June 2025) and WIRON (for the period from 13 August 2023 to 12 August 2025).

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 Management Board 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 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 2025:

- Jacques Rinino – Chairperson of the Committee (independent member)
- Francois Benaroya – Member of the Committee
- Małgorzata Chruściak – Member of the Committee (independent member)
- Mariusz Warych – Member of the Committee
- Lucyna Stańczak-Wuczyńska – Member of the Committee (independent member)

Three 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".

Meetings of the Risk Committee

The Risk Committee meets at least four times a year. The dates of the meetings are set by the Chairperson of the Committee. In 2025, the Risk Committee held four meetings and one vote 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.,
- BNP Paribas Bank Polska S.A.’s capital plan for 2026-2030,
- the BNP Paribas Bank Polska S.A. capital contingency 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 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.,
- Information on the implementation of the retail exposure management policy to the extent required under PFSA’s Recommendation T,
- Information on the implementation of the mortgage-backed exposure management policy to the extent required under PFSA’s Recommendation S,
- Information on the implementation of the concentration risk management policy to the extent required under PFSA’s Recommendation C,
- Report on the Bank’s internal capital adequacy assessment process review (ICAAP),
- Report on the ILAAP review,
- Information on the effectiveness of risk model management,
- Review of the operational risk strategy for 2025 and assumptions of the operational risk strategy for 2026,
- Update of the Stress Test Programme Methodology and the Stress Test Result Report,
- Review of the Non-performing Exposure Management Policy and its requirements,
- Monitoring of the pricing policy,
- Information on the performance of outsourcing contracts.



The Committee discussed the following matters:

- Geopolitical risk – ECB’s supervisory priorities,
- Information on the results of the PFSA inspection of concentration risk and unauthorised transactions: recommendations, action plan, impact on SREP,
- Result of the review of the impact of customs (direct and indirect) on the loan portfolio,
- Information on the share of mortgage loan production with DTI above 35% at disbursement and during loan lifetime,
- Information on progress of the decarbonisation strategy and data collection and targets for emission reductions. Analysis of 2-3 other banks’ greenhouse gas emissions and GAR compared to the Bank,
- Update on the benchmark reform,
- Information on NBI of the Equity Investment Office’s investment portfolio,
- Information on the status and action plan on low quality data,
- Information on data leak reporting to the Supervisory Board,
- RWA of the corporate and securities portfolios.

In 2025, the Committee paid particular attention to the following 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 and WIBOR,
- situation of the CHF mortgage portfolio and progress of voluntary settlements,
- risk of unauthorised transactions,
- ESG risks and the decarbonisation and emission reduction strategy for the Bank’s portfolio,
- concentration risk,
- impact of CRR3 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 2025. 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 others: 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 Supervisory 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 position holders 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.

Composition of the Remuneration Committee as at 31 December 2025:

- Lucyna Stańczak-Wuczyńska – Chairperson of the Committee (independent member)
- Francois Benaroya – Member of the Committee
- Małgorzata Chruściak – Member of the Committee (independent member)

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 Remuneration Committee

Meetings of the Remuneration Committee are 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 2025, the Remuneration Committee held eight meetings, one of which was 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 for 2024,
- issued a recommendation on changes to the terms of remuneration of a Member of the Management Board,
- 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 2024,
- issued an opinion on the evaluation of the application of the Remuneration Policy at the Bank,
- 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 Rules of the Remuneration Committee,
- discussed the Reports on the remuneration of the members of the Management Board and the Supervisory Board of BNP Paribas Bank Polska S.A. for 2024,
- prepared and discussed the annual report on the Remuneration Committee’s activities for the Supervisory Board,
- issued an opinion on proposed amendments to the Policy on remuneration of Employees of BNP Paribas Bank Polska S.A.,



- discusses the terms of the issue of series A6 subscription warrants issued under Resolution 5 of the Extraordinary General Meeting of 31 January 2020 (as amended) and the terms of the issue of series B3 subscription warrants issued under Resolution 39 of the Annual General Meeting of 27 June 2022.

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 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 candidates 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 Nominations Committee makes an individual assessment of the suitability (initial and periodic) 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 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 holding 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 position holders and 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 Board and the Supervisory Board and the recommended candidates for the Management Board and the Supervisory Board. 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 (including 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.

Composition of the Nominations Committee as at 31 December 2025:

- Lucyna Stańczak-Wuczyńska – Chairperson of the Committee (independent member)
- Francois Benaroya – Member of the Committee
- Małgorzata Chruściak – Member of the Committee (independent member)

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 Nominations Committee

Meetings of the Committee are 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 Chairperson of the Nominations Committee. In 2025, the Nominations Committee held eight meetings, including four meetings in writing.

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 Management Board and the Supervisory Board,
- carried out an assessment of the individual suitability of a candidate for Supervisory Board member of BNP Paribas Bank Polska S.A. and an additional assessment of the collective suitability of the Supervisory Board of the Bank in the new composition,
- carried out an assessment of the individual suitability of candidates for Supervisory Board committees and an additional assessment of the collective suitability of the committees,
- prepared and discussed the annual report on the activities of the Nominations Committee for the Supervisory Board,
- carried out a periodic assessment of the individual and collective suitability of the members of the Management Board of BNP Paribas Bank Polska S.A. and a periodic assessment of the individual and collective suitability of the members of the Supervisory Board of BNP Paribas Bank Polska S.A.,
- carried out an assessment of the individual suitability of a candidate for Vice-President of the Management Board of the Bank and an additional assessment of the collective suitability of the Management Board of BNP Paribas Bank Polska S.A.,
- issued an opinion on the appointment of a candidate for Managing Director of the Internal Audit Division,
- issued an opinion on the discharge of duties to the members of the Management Board of the Bank for the financial year ended 31 December 2024.



Management Board of the Bank

Principles of operation 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 Articles of Association and the Rules 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 Articles of Association. 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 mandate of the members of the Management Board expires 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 must be persons well acquainted with the banking market in Poland, i.e. 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 Articles of Association and in the Rules of the Bank's Management Board.

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 activity reports 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 Management Board members,
- establishes a policy for the identification of key functions and the appointment and removal of key function holders,
- 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 internal 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, a resolution of the Management Board is not required if the purchase or 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 2025, in addition to the aforementioned topics, the Bank's Management Board focused its attention and work on issues relating to the CHF mortgage portfolio, unauthorised transactions, 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 Articles of Association specify how the Management Board represents the Bank. Pursuant to § 26 of the Bank's Articles of Association, 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.

Decisions of the Management Board take the form of resolutions and are 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 Management Board meetings at the Bank's Head Office and also take decisions by means of direct remote communication.

Management Board meetings in 2025 were held in a hybrid model. The Management Board in 2025 held 63 meetings, including 8 written votes. The Management Board members passed 151 resolutions.



Table 144. Composition of the Bank’s Management Board, together with the division of the functional responsibilities of the individual members, as at 31 December 2025 and as at 31 December 2024

name	function on the Bank’s Management Board	supervised area
Przemysław Gdański	CEO	Bank Management, Strategy and Agricultural Markets, Human Resources Management, Transformation, Sustainability
André Boulanger	Vice-President	CIB
Małgorzata Dąbrowska	Vice-President	Operations and Business Support
Wojciech Kembłowski	Vice-President	Risk
Piotr Konieczny	Vice-President	Finance
Magdalena Nowicka	Vice-President	New Technologies and Cybersecurity
Volodymyr Radin	Vice-President	Personal Finance (PF) Retail and Business Banking
Agnieszka Wolska	Vice-President	SME and Corporate Banking

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 suitability assessment process,
- receiving a recommendation from the Nominations Committee.

Changes to the composition of the Bank’s Management Board in 2025 and after the reporting period:

- on 21 October 2025, Mr Andre Boulanger resigned as Vice-President of the Bank’s Management Board, Head of Corporate and Institutional Banking (CIB) as of 31 December 2025,
- on 10 December 2025, Ms Natalie Yacoubian was appointed Vice-President of the Bank’s Management Board, Head of Corporate and Institutional Banking (CIB) as of 1 January 2026,
- on 2 January 2026, Ms Agnieszka Wolska resigned as Vice-President of the Bank’s Management Board as of 2 January 2026.



Members of the Bank's Management Board



1. Przemysław Gdański – President 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. In 2018, he received the special award Male Champion of Change of the Fundacja Sukcesu Pisanego Szminka. He supervises Sustainability in the Bank.

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 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 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 including 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 Pierwszy Polsko-Amerykański 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 IT Systems Development for Retail Customers. In January 2022, she took on the role of Open & Beyond Banking Tribe Leader, and additionally served as Candidate and Employee Experience Tribe Leader 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. Se completed the Cambridge Senior Executive Programme Mastering Sustainable Finance and a number of additional training courses related to sustainability.



4. Wojciech Kemblowski – 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 among others by Harvard Business School and executive trainings prepared by Raiffeisen Bank International AG. At the beginning of his professional career, from 1993 to 1997, he was affiliated with CSBI in the Sygnity group, where he was an analysis manager 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 affiliated 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 affiliated 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 Finance (CFO). He was also a member of the Supervisory Boards of Raiffeisen Towarzystwo Funduszy Inwestycyjnych S.A. and Raiffeisen Leasing Polska S.A. He continued his career at BNP Paribas Group S.A. as advisor to CFO at BNP Paribas Bank Polska S.A. (in 2018-2019), and from 2019 as a member of the Management Board of Uksibbank 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 which coordinates the preparation of sustainability reporting as of 2024.



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 affiliated 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 management board of ING Services Polska. 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 spódnicy" 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 marketing studies at HEC in Paris and 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 Uksibbank (BNP Paribas Group). In 2014, he became Director of the Personal Finance business line and a member of Uksibbank'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 enforcement, call centre. A degree in finance underpinned his 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. Since 1 January 2024, he also supervises the Retail and Business Banking Area. W związku z rezygnacją złożoną przez wiceprezes Zarządu – Panią Agnieszkę Wolską – objął również nadzór nad Obszarem Bankowości MSP i Korporacyjnej. Following the resignation of Agnieszka Wolska as Vice-President of the Management Board, he also supervises SME and Corporate Banking.



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 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. She completed the educational programme Sustainability Academy of the BNP Paribas Group; BNP Paribas' Sustainable Finance Solutions, Future of ESG. From September 2021 to 2 January 2026, she was Vice-President of the Management Board of BNP Paribas Bank Polska S.A. and oversaw the SME and Corporate Banking Area.



Remuneration of the Management Board and the 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 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 a Significant Impact on the Risk Profile of BNP Paribas Bank Polska S.A.:

- 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 it takes into account the appropriate ratio of fixed remuneration to variable remuneration;
- it is possible to award variable remuneration paid on a one-off basis when recruiting individuals to positions identified as having a significant 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 (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 the court, are not subject to the principles of deferral and split as remuneration in the form of shares of 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 rues do not encourage persons with a significant impact on the Bank’s risk profile to take excessive risks with regard to sustainability risks and are linked to risk-adjusted performance.

Under the applicable Labour Code, no clawback mechanism is used at the Bank.

The General Meeting adopts the Remuneration Policy for the members of the Supervisory Board of BNP Paribas Bank Polska S.A. and the Remuneration Policy for persons with a significant impact 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 persons employed as members of the Bank’s Management Board,
- determining the content of contracts for the performance of the function of a member of the Bank’s Management Board,
- submitting annual information to the Supervisory Board on the Bank’s employment and remuneration structure,

- exploring the possibility of hiring external remuneration consultants whose duties may include providing advice and support to the Supervisory Board.

The remuneration paid to individual members of the Management Board during the year is as follows:

Table 145. Remuneration paid to members of the Management Board in 2025

PLN’000	Period in office		Basic salary	Variable remuneration paid in the year	Issued shares ²	Additional benefits	Total ¹
Name	from	to					
Przemysław Gdański	01.01.2025	31.12.2025	3,070	679	669	185	4,603
André Boulanger	01.01.2025	31.12.2025	1,262	453	490	213	2,418
Małgorzata Dąbrowska	01.01.2025	31.12.2025	964	120	0	129	1,213
Wojciech Kembłowski	01.01.2025	31.12.2025	1,490	323	327	144	2,284
Piotr Konieczny	01.01.2025	31.12.2025	1,218	239	47	124	1,628
Magdalena Nowicka	01.01.2025	31.12.2025	1,345	234	219	166	1,964
Volodymyr Radin	01.01.2025	31.12.2025	1,465	218	119	106	1,908
Agnieszka Wolska	01.01.2025	31.12.2025	1,394	263	225	142	2,024
Total			12,208	2,529	2,096	1,209	18,042

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 146. Remuneration paid to members of the Management Board in 2024

PLN'000	Period in office		Basic salary	Variable remuneration paid in the year	Issued shares ²	Additional benefits	Total ¹
Name	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

The members of the Management Board entered into employment agreements 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 applicable during their employment relationship with BNP Paribas Bank Polska S.A. In addition, two 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 S.A. Group.

In accordance with their individual employment agreements, members of the Management Board are entitled to life insurance and a medical care package. In addition, fringe benefits to which members of the Management Board are entitled (based on individual employment agreements) include:

- housing allowance specified in the employment agreement,
- 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.

Remuneration paid to individual members of the Supervisory Board during the year is presented in the tables below:

Table 147. Remuneration paid to members of the Supervisory Board in 2025

PLN'000	Period in office		Remuneration for work in the Supervisory Board ¹	Deferred variable remuneration due to previous membership in the Management Board	
Name	od	do		Cash part	Issued shares ²
Lucyna Stańczak-Wuczyńska	01.01.2025	31.12.2025	590	-	-
François Benaroya	01.01.2025	31.12.2025	-	-	-
Jean-Charles Aranda	01.01.2025	31.12.2025	-	49	148
Małgorzata Chruściak	01.01.2025	31.12.2025	296	-	-
Sophie Heller	01.01.2025	31.12.2025	-	-	-
Monika Kaczorek	01.01.2025	31.12.2025	309	-	-
Bożena Leśniewska	15.04.2025	31.12.2025	120	-	-
Vincent Metz	01.01.2025	31.12.2025	-	-	-
Piotr Mietkowski	01.01.2025	31.12.2025	-	-	-
Khatleen Pauwels	01.01.2025	31.12.2025	-	-	-
Jacques Rinino	01.01.2025	31.12.2025	284	-	-
Mariusz Warych	01.01.2025	31.12.2025	372	-	-
Total			1,971	49	148

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 148. Remuneration paid to members of the Supervisory Board in 2024

PLN'000	Period in office		Remuneration for work in the Supervisory Board ¹	Deferred variable remuneration due to previous membership in the Management Board	
Name	from	to	Cash part	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

Information on the remuneration of the members of the Bank's Management Board and Supervisory Board can also be found in Note 52 Related Party Transactions in the Separate Financial Statements of BNP Paribas Bank Polska S.A. for the year ended 31 December 2025.

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 S.A.

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 key function holders at BNP Paribas Bank Polska S.A.

The diversity policies for members of the Management Board and the Supervisory Board are designed to ensure a wide range of qualities 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 Articles of Association 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:

- knowledge, skills and professional experience covering:
 - 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 among others:
 - reputation,
 - financial situation,



- criminal record,
- capacity for independent judgement, taking into account personal competences (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 substantive 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. Under the GObeyond strategy, the Bank decided to ensure that by 2025 it will have 30% women on the Management Board and maintain the proportion of the underrepresented gender on the Supervisory Board at a minimum of 30% of its composition.

As at 31 December 2025, the proportion of women on the Supervisory Board was 50.0%, 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 149. Gender, age and tenure diversity at the Bank as at 31 December 2025*

Gender	Women	Men	Total
Supervisory Board	6	6	12
Management Board	3	5	8
Top management (B1+B2)	145	184	329
Total	154	195	349

Age	<30 years	30-50 years	>50 years	Total
Supervisory Board	0	0	12	12
Management Board	0	2	6	8
Top management (B1+B2)	1	224	105	329
Total	1	226	123	349

Seniority at the Bank (years)	<5	5-10	10-15	15-20	20-25	>25	Total
Supervisory Board	8	2	2	0	0	0	12
Management Board	2	4	1	0	1	0	8
Top management (B1+B2)	75	54	52	67	45	36	329
Total	85	60	55	67	46	36	349

** figures present the Bank's active employees as at 31 December 2025*



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, in compliance with the requirements of the Polish Financial Supervision Authority 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 three lines of defence model, consisting of:

- first line of defence (1LoD):
 - constituted by the owners of risk, exercised by managing that risk and ensuring that the controls in the area of delegated responsibility operate effectively and in accordance with the law;
 - responsible for compliance with the rules arising from approved policies, regulations, instructions and procedures;
 - 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):
 - responsible for managing individual risks independently of risk management on the first line of defence, taking into account the requirements set by the supervisory authorities, business needs, including the risk appetite adopted by the Bank;
 - 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 ongoing 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 regulations.

The Bank has a process architecture within which significant processes are identified according to specific criteria. The control function for significant processes is documented by the Bank using the Control Function Matrix (CFM), which is a description of the link between the general and specific objectives of the internal control system and the significant processes, together with the key controls embedded in these processes and the independent monitoring of these controls. The Bank supports the CFM 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.

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 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 are 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 along with their owners, who are responsible for the correct and timely execution of the various activities.

As part of risk management in the process of preparing financial statements, the Bank monitors 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 the audit firm, 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 audit firm to audit the financial statements of the Bank and the Group and to provide sustainability reporting assurance pursuant to the provisions of the Bank's Articles of Association 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.

In September 2025, the Supervisory Board selected Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp.k. to provide assurance of the Group's sustainability reporting for 2025.

On 10 December 2025, based on a recommendation of the Audit Committee, the Supervisory Board selected the same audit firm to audit and review the financial statements and to provide sustainability reporting assurance for 2026-2029.

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.

Table 150. Auditor's fees by type of service

PLN'000 (incl. VAT)	12 months ended 31.12.2025			12 months ended 31.12.2024		
	Bank	Bank's subsidiaries	Total	Bank	Bank's subsidiaries	Total
Statutory audit	2,729	316	3,045	2,635,	305	2,940
Other assurance services*	1,845	875	2,720	1,556	843	2,399
Other	44	0	44	57	0	57
Total	4,618	1,191	5,809	4,248	1,148	5,396

** This category includes the fees of the auditor who performed the review of the interim financial statements, sustainability reporting assurance, verification of the reporting packages for the consolidation of the BNP Paribas Group. The review and audit of funds managed by the subsidiary TFI are also included in this category.*



Other information

- 281 Legal compliance
- 289 Events after the balance sheet date
- 290 Statements of the Management Board of BNP Paribas Bank Polska S.A.



Legal compliance

Court and administrative proceedings

Legal risk

As at 31 December 2025, 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.

UOKiK proceedings

Court decision on the UOKiK decision regarding calculation of the interchange fee

On 6 October 2015, the Court of Appeal 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 means 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 Raiffeisen Bank Polska S.A. (RBPL) did not change the situation of the Bank as RBPL was not a party to this claim.

On 23 November 2020, the Court of Appeal quashed the judgment of the first instance court and remitted the case for reexamination. In November 2022, the first hearing was held. The case is pending.

Proceedings on practices violating collective consumer interests – unauthorised transactions

On 8 July 2022, the Office of Competition and Consumer Protection (UOKiK) initiated proceedings related to the practices violating 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/conducted by the customer. The second allegation of the UOKiK relates to the Bank providing inappropriate

information to customers when rejecting complaints about the disputed transaction. The Bank is talking to the UOKiK to agree a final decision, the proceedings are expected to be completed in April 2026. The case is pending, the Bank is working with the UOKiK to finalise it. The UOKiK announced an extension of the proceedings until 11 April 2026.

Details of the cost of provisions against unauthorised transactions of customers are described in Note 14 Other operating expenses.

Proceedings for practices violating the collective interests of consumers – credit holidays

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 payment suspension 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).

The Bank disagreed with the allegations and sent its reply to UOKiK, in which it pointed out that the Bank accepted and processed all individual applications submitted 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 recognised 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 appealed against the decision to the Competition and Consumer Protection Court. On 8 December 2023, the court delivered to the Bank the UOKiK’s response to the Bank’s appeal, filed with the UOKiK on 28 August 2023.

The Bank created a provision in the amount of the penalty imposed.

On 24 March 2025, the Court announced its decision which dismissed the Bank’s appeal. The Bank appealed against the Court’s decision on 9 May 2025.



PFSA proceedings

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 against the Bank 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 during the period 31 January 2017 to 31 August 2019, by failing to exercise due control of the factual and legal acts carried out by 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 law and the statutes of these funds.

By decision of 14 June 2024, the Polish Financial Supervision Authority imposed a fine of PLN 1,000 thousand on the Bank for breach of obligations related to ensuring that the net asset value of the funds and the net asset value per investment certificate are calculated in accordance with the law, for valuation dates falling between 31 October 2018 and 31 July 2019. In the justification for the decision, the PFSA indicated that the breach of the aforementioned depositary duties consisted mainly of: (i) not obtaining full information on the financial situation of the issuers of the bonds that the funds were purchasing, which resulted in the Depositary not being able to fully assess the bond issuers' ability to redeem the bonds, (ii) not performing an analysis of the impact of circumstances regarding the financial situation of bond issuers on the rationale for impairment losses on bonds and the final fair value measurement of bonds, (iii) failure to investigate the reasons for negative capital on the part of bond issuers and the possible impact of these circumstances on the bond issuers' ability to repay their bond redemption obligations. The PFSA dismissed 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 applied for reconsideration of the case by the Polish Financial Supervision Authority.

The Bank created a provision for the imposed penalty.

The Polish Financial Supervision Authority informed the Bank that the proceedings to determine the aforementioned application are scheduled to be completed in March 2026.

On 7 December 2022, the Polish Financial Supervision Authority initiated administrative proceedings for the imposition of a penalty under 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 the years 2017 – 2019, by failing to exercise continuous control over the factual and legal actions carried out by the Retail Parks Fund of 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 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.

In the justification for the decision, the PFSA indicated that the breach of the above-mentioned duties of the Depositary consisted primarily in the failure to conduct a thorough analysis of the circumstances affecting the determination of the situation of the issuers of the bonds purchased by the fund and to obtain sufficient information on the circumstances affecting this situation. As a result the Depositary did not recognise the legitimacy of making impairment allowances for the bonds in an appropriate amount and the valuation of the bonds was inadequate to their actual value. The PFSA dismissed the proceedings in the part concerning the suspected breach in the period from 1 January 2017 to 30 October 2018.

On 4 July 2024, the Bank has applied for reconsideration of the case by the Polish Financial Supervision Authority. The Bank created a provision for the imposed penalty. The Polish Financial Supervision Authority informed the Bank that the proceedings for the recognition of the aforementioned application are scheduled to be completed in March 2026.

Administrative proceedings of the Polish Financial Supervision Authority for the imposition of a penalty in connection with a breach of the Act on Trading in Financial Instruments

On 24 January 2025, the Polish Financial Supervision Authority opened administrative proceedings against BNP Paribas Bank Polska S.A. for the imposition of a penalty under Article 138(3)(3a) or Article 138(7aa)(1) of the Banking Law in connection with a breach of the Act on Trading in Financial Instruments.

The proceedings are pending.

Legal risks of the portfolio of foreign currency and CHF denominated loans

Court proceedings instigated by the Bank's customers being parties to foreign currency and CHF denominated loan agreements

The gross balance sheet value of residential mortgage loans granted to retail customers in CHF as at 31 December 2025 amounted to PLN 254,276 thousand, compared with PLN 406,207 thousand as at 31 December 2024.

As at 31 December 2025, the number of active foreign currency and CHF denominated loans amounted to 5.3 thousand.

As at 31 December 2025, the Bank was a defendant in 5,865 (1,456 new cases in 2025) pending court proceedings (including legally finalised cases, customers brought a total of 11,047 claims against the Bank), in which they demand either that a foreign currency or CHF denominated mortgage loan agreement be declared invalid or that the agreement be declared permanently ineffective and the amounts paid to date be repaid. The claims are based on the presence of abusive



provisions in the agreement which do not allow the agreement to be sustained (Article 3851 of the Civil Code); the Bank is not a party to any collective claim involving such loan agreements.

The total value of the claims asserted in the currently pending cases as at 31 December 2025 amounted to PLN 3,126,776 thousand (PLN 3,495,835 thousand as at 31 December 2024), and in the legally concluded cases to PLN 2,107,350 thousand (PLN 1,141,019 thousand as at 31 December 2024).

By 31 December 2025, in 5,182 finalised proceedings, there were 1,403 judgments in favour of the Bank, including 908 in connection with court settlements and 453 cases in connection with the proceedings being stayed. In 3,779 cases the courts ruled against the Bank, 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 Court of Justice (EU) (C-19/20 and C-932/19), in the vast majority rule on the invalidity or ineffectiveness of credit agreements.

The total impact of legal risk related to litigation as at 31 December 2025 was PLN 2,823,983 thousand (PLN 3,238,760 thousand as at 31 December 2024), with an impact of PLN 498,751 thousand on the Bank's statement of profit or loss in 2025 (PLN 795,728 thousand in 2024).

In 2025, the Bank used PLN 289,634 thousand from the estimated impact of legal risk of CHF loans in connection with settlements reached (in 2024, the Bank used PLN 422,952 thousand on this account).

In 2025, the Bank used PLN 622,260 thousand from the estimated impact of legal risk of CHF loans in connection with final judgments received declaring loan agreements invalid (in 2024, the Bank used PLN 438,786 thousand on this account).

In estimating the impact of legal risk, the Bank takes into account, among others, 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 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 145,884 thousand from 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 principal and interest instalments repaid together

with the statutory default interest awarded, 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 and the recognition of a result from the derecognition and the recording of settlements with customers.

The accounting effect of a final judgment declaring the loan agreement invalid is the derecognition of CHF loan exposure and the recording of 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 amount of the estimated impact would change by +/- PLN 79,630 thousand.

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 lost cases	+5 p.p.	+PLN 62.8 million
	-5 p.p.	-PLN 80.4 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%	+PLN 26.7 million
	-20%	-PLN 26.7 million

Additionally, according to the Bank's assessment, if an additional 1% of customers with CHF loans filed a lawsuit against the Bank, the loss due to legal risk would increase by approx. PLN 24,246 thousand.

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 collected certificates and the changing number of lawsuits in order to update the estimated 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 issues are relevant to the assessment of the risks associated with proceedings involving part of the Bank’s portfolio.

The Bank monitors the courts’ rulings on an ongoing basis and will adjust the level of estimated impact of legal risk to the current case-law. At the same time, the Bank is aware that the assumptions made are subject to a subjective assessment of the current situation, which may change in the future. In determining the value of the estimated impact of legal risk, the Bank relies on all information available at the date of signing the financial statements.

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 in respect of settlements falling within the scope of the Regulation of the Minister of Finance of 11 March 2022, as amended by the Regulation of 20 December 2022, in force until the end of 2024, on the abandonment of the collection of income tax on certain income (net income) related to a residential mortgage loan.

As at 31 December 2024, the Bank held assets of PLN 38,165 thousand, which were realised in full in 2025. In 2025, the Bank additionally realised assets at PLN 1,863 thousand, set up during 2025 on the basis of additional legal risk provisions. Based on an new estimate of the impact of the legal risk associated with foreign currency loans as at 31 December 2025, the Bank leaves PLN 32,161 thousand in assets with an expected realisation by the end of 2026; at a rate of 19%, the asset would be PLN 23,599 thousand.

In addition, based on:

- the ruling of the Supreme Administrative Court 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 ordered by the court consists of a tax-deductible cost for the Bank on the date of payment, and
- the analysis of their impact on the deferred tax estimate,

the Bank recognised a deferred tax asset.

Individual settlements offered by the Bank in CHF loan cases

Since December 2021, the Bank is involved in individual negotiations with its customers with whom the Bank is in dispute or for whom there is a reasonable risk of entering into a dispute. The Bank took this parameter into account when updating the amount of the total impact of legal risk.

As at 31 December 2025, the Bank made individual settlement proposals to 14,473 customers (13,915 customers as at 31 December 2024) and 7,130 customers accepted the terms of the proposals presented (6,202 in 2024), out of which 6,724 settlements were signed (5,550 in 2024).

Case law of the Court of Justice (EU) in 2025

On 19 June 2025, the CJEU passed a judgment in case C-396/24 (Lubreczlik) concerning mBank S.A. According to the CJEU, Directive 93/13 should be interpreted as precluding national case-law according to which:

- 1) where a term of a loan agreement classified as unfair renders that agreement invalid, the seller or supplier is entitled to require the consumer to repay the full nominal amount of the loan, irrespective of the value of repayments made by the consumer in performance of that agreement and irrespective of the amount remaining due;
- 2) in the event of the consumer’s acceptance of a claim, brought by a seller or supplier, for repayment of the sums paid under a loan agreement declared invalid based on the presence of an unfair term in that agreement, the court is required to declare of its own motion the judgment granting that claim immediately enforceable, in so far as national law does not allow that court to adopt all the measures necessary to protect the consumer from the particularly unfavourable consequences which that declaration could have with regard to that consumer.

On 27 November 2025, the CJEU passed a judgment in case C-746/24 (Gryczara) concerning Bank Millennium S.A. According to the judgment, Directive 93/13 should be interpreted as precluding national legislation which allows a consumer, as the defendant who has been unsuccessful in an action brought by a seller or supplier for repayment of the loan capital following the annulment of a loan agreement on account of the unfairness of terms contained therein, to be ordered to pay the costs including court costs which, as a result of the distinction made by that legislation in the calculation of the amount of those costs according to whether the applicant is a consumer, significantly exceed those which that consumer would have had to bear if he or she had been unsuccessful in an action brought by him or her seeking a declaration that those terms are unfair and, as the case may be, a declaration of the invalidity of those terms and of the loan agreement.

On 11 December 2025, the CJEU passed a judgment in case C-767/24 (Kuszycka) concerning mBank S.A. According to the CJEU, Directive 93/13 must be interpreted as meaning that, in the context of the annulment in its entirety of a mortgage loan agreement concluded between a consumer and a banking institution, on the ground that that agreement contains an unfair term without which that agreement cannot continue in existence, it precludes the application of national case-law according to which the submission by that consumer of a declaration of set-off of his or her claim against that of that banking institution entails an implied waiver of the objection that the claim relied on by that institution is time-barred.

Supreme Court case law on CHF denominated and foreign currency loans

On 25 April 2024, the full formation of the Civil Chamber of the Supreme Court adopted the so-called ‘large resolution on Swiss franc loans issue’, resolving the key legal issues, ref. III CZP 25/22, according to which:

- 1) If a provision of an index-linked or denominated loan agreement relating to the method of determining the foreign currency exchange rate consists of an unfair contractual term and is not binding, that provision cannot, in the current state of the law, be regarded as being replaced by another method of determining the foreign currency exchange rate which results from legal or customary provisions.



2) If it is not possible to establish a foreign currency exchange rate that is binding on the parties in an indexed or denominated loan agreement, the agreement shall also not be otherwise binding.

3) Where, in the execution of a loan agreement which is not binding due to the unfair nature of its terms, the bank has provided the borrower with all or part of the amount of the loan and the borrower has made repayments of the loan, independent claims for the repayment of undue benefits arise in favour of each party.

4) If a loan agreement is not binding because of the unfair nature of its terms, the limitation period for the bank’s claim for repayment of sums paid out in respect of the loan begins, as a general rule, from the day following the day on which the borrower challenged the terms of the agreement as binding.

5) If a loan agreement is not binding because of the unfair nature of its terms, there is no legal basis for either party to claim interest or other remuneration for the use of its funds during the period between the time when the undue benefit was provided and the time when repayment of that benefit is delayed.

The resolution refers only to the effects of declaring conversion clauses in indexed or denominated loan agreements as unfair (without prejudging whether such clauses are unfair). 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 execution of the loan agreement.

It should be emphasised that the position of the Supreme Court expressed in the justification does not unequivocally resolve previous divergences in case law regarding the definition of a foreign currency loan (see, e.g., the judgment of the Supreme Court of 20 May 2022, case no. II CSKP 713/22; the decision of the Supreme Court of 24 June 2022, case no. I CSK 2822/22; the judgment of the Supreme Court of 26 January 2023, case no. II CSKP 408/22; the judgment of the Supreme Court of 31 January 2023, case no. II CSKP 334/22; the judgment of the Supreme Court of 15 September 2023, case no. II CSKP 1356/22; the judgment of the Supreme Court of 9 May 2024, case no. II CSKP 2416/22; and the judgment of the Supreme Court of 25 July 2024, case no. II CSKP 1424/22).

However, as the Supreme Court noted in the justification to the resolution, this kind of loan is not subject to questions referred by the First President of the Supreme Court.

The Supreme Court noted that in the case of foreign currency loans in which there is no problem of unfair terms in determining the exchange rate at the time of disbursement of the loan by the bank, or in which, as a result of the removal of such unfair terms, the agreement is still in force in a form in which, in principle, repayment of the loan in foreign currency is possible, it may be assumed that Article 358 § 2 of the Civil Code, as the relevant provision, applies to the conversion of the exchange rate (i.e. the agreement may be continued using the average exchange rate of the National Bank of Poland).

This position of the full formation of the Chamber of the Supreme Court was reflected in a separate opinion of Supreme Court Judge Dariusz Pawłyszczke regarding the judgment of the Supreme Court of 25 June 2024, ref. II CSKP 1765/22 (concerning the Bank). In the justification of the separate opinion, the Judge pointed to the different structure of the Bank’s

loan agreements and argued that Resolution III CZP 25/22 did not apply to foreign currency loans as, under such agreements, the option of repayment in PLN (at the bank’s exchange rates) is merely the borrower’s right.

The case-law of common courts includes decisions pointing to the different nature of foreign currency loans and the impact of such classification on the validity of agreements. This position was taken by the Appeal Court in Warsaw in its legally valid judgment, favourable to the Bank, of 5 June 2025, ref. VIII ACa 2851/25. The Court stressed the foreign currency aspect of the loan agreement between the Bank and the consumer, found no infringement of consumer interests, and confirmed the validity of the loan agreement.

Following the CJEU judgment of 19 June 2025 in case C-396/24 (Lubreczlik), the Supreme Court confirmed the applicability of the legal principle defined in the resolution of the full formation of the Civil Chamber of the Supreme Court of 25 April 2024, ref. III CZP 25/22, i.e., where a loan agreement is not binding due to its terms being unfair, separate claims arise for the return of undue benefits for each party of the agreement. On 6 August 2025, the Supreme Court passed a judgment in case II CSKP 774/23, confirming that the theory of two separate claims applied to settlements between a bank and borrowers where the loan agreement is declared invalid. Likewise, the Supreme Court in another formation pointed out in its judgment of 5 September 2025 in case II CSKP 550/24 that the legal principle defined in point 3 of the resolution of the full formation of the Civil Chamber of the Supreme Court of 25 April 2024 in case III CZP 25/22 was binding (similar to the judgment of the Supreme Court of 18 July 2025, II CSKP 84/23). In its judgment of 10 July 2025, II CSKP 64/23, the Supreme Court ruled that the legal principle defined by the full formation of the Chamber of the Supreme Court could only be departed from by passing another resolution of the same formation (Article 88 of the Act on the Supreme Court).

As at 31 December 2025, 295 appeals on a point of law were filed with the Supreme Court in cases of CHF loans granted by the Bank, 44 appeals were accepted by the Supreme Court for examination and are awaiting substantive decision, as to 159 appeals on a point of law, the Supreme Court issued a decision on refusal to accept them for examination. Nine cases were sent back for examination, while in 22 it dismissed the appeals on a point of law.

Draft Act on special solutions for handling cases concerning loan agreements denominated or indexed to CHF concluded with consumers

On 30 January 2025, the Ministry of Justice published a draft Act on special solutions for handling cases concerning loan agreements denominated or indexed to CHF concluded with consumers. Following comments raised in the public consultation and the CJEU judgment of 19 June 2025 in case C-396/24 (Lubreczlik), a new draft Act was published dated 30 June 2025.

The goal of the draft law is to accelerate court proceedings concerning loan agreements denominated or indexed to CHF. The key mechanisms set out in the draft include:

- protection of consumer interests (Article 3 of the draft) – once an action lodged by a consumer is served on the defendant or once a counterclaim lodged by the consumer is served on the plaintiff, the obligation of the consumer to perform the benefits arising from the loan agreement is suspended by law until the proceedings are closed with a final judgment;



- plea of offset (Articles 5 and 18 of the draft) – change to the time limitation for the option of raising the plea of offset in the proceedings (until the proceedings are closed in second instance);
- counterclaim (Article 8 of the draft) – change to the time limitation in civil proceedings (under the general procedure, no later than in the statement of defence) – allowing for a counterclaim to be lodged until the hearing is closed in first instance.

The draft law was tabled to the Sejm on 2 October 2025.

The Sejm held the first reading of the draft on 16 October 2025, after which the draft was referred to the Committee for Justice and Human Rights (and the Committee for the Economy and Development). Both Committees started to work on the draft on 17 December 2025 at a joint meeting.

The work on the draft is scheduled to continue in 2026.

Other material court proceedings

Court proceedings concerning mortgage loan agreements with interest rates based on WIBOR

In January 2023, the Bank received the first claims challenging the variable interest rate clauses based on the WIBOR benchmark in mortgage loan agreements. These claims seek to challenge WIBOR as the basis for variable interest rates. In addition, the extent to which and the manner in which consumers are provided with instructions and information about the volatility of the benchmark as well as the methods of calculating the benchmark and the factors influencing its change are contested.

By 31 December 2025, the Bank received a total of 130 claims (2 claims were withdrawn). The actions were filed on behalf of consumers and relate to mortgage loan agreements in PLN, only 1 action was filed by an entrepreneur 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 rate. The total value of the subject of litigation in ongoing court proceedings lodged by customers is PLN 33,401 thousand. Most of the court proceedings are pending before the courts of first instance. In nine cases, judgments of the court of first instance favourable to the bank were issued, three of which are legally binding. One judgment is unfavourable to the Bank and is not legally binding.

Arguments challenging WIBOR as a benchmark are also raised in debt enforcement cases filed by the Bank.

The Bank’s position is that the customers’ claims are unjustified, in particular in view of the fact that WIBOR is an official benchmark 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. The same position was 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.

Four questions regarding WIBOR have been referred to the CJEU, including one question referred to in connection with a case pending against the Bank (no judgments have yet been passed in those cases):

- Case C-471/24 against PKO BP SA (agreement concluded after the effective date of the BMR and the Act on mortgage loans and supervision over mortgage loan intermediaries and agents, the “mortgage loan act”) – questions were referred on the possibility of examining contractual provisions concerning floating interest rates based on WIBOR, information obligations of banks regarding floating interest rate risk, and the possibility of continued existence of a loan agreement based on a fixed margin where contractual provisions concerning floating interest rates based on WIBOR are declared unfair. According to the opinion of the Advocate General published on 11 September 2025, it is admissible to examine contractual provisions concerning floating interest rates under Directive 93/13, the WIBOR determination method cannot be challenged by reference to Directive 93/13, the bank should inform the consumer of the name of the benchmark, its administrator and the effect of changes to the benchmark on loan interest rates. The judgment is expected to be announced on 12 February 2026.
- Case C-586/25 against PKO BP SA (agreement concluded before the effective date of the BMR and the mortgage loan act) – the Court referred among other questions whether, in the light of Directive 93/13, the provisions of a loan agreement concerning floating interest rates based on WIBOR could be considered to be phrased in a simple and understandable language, whether the fact that the floating interest rate of a loan is based on WIBOR, whose determination rules were not based on generally applicable law but which was determined by a third party while the bank had an indirect impact on the benchmark, results in a significant imbalance of the rights and obligations of the parties, and whether, where the provisions of an agreement concerning floating interest rates based on WIBOR are declared unfair contractual provisions, the agreement may continue to exist as a loan at a fixed interest rate based on the bank’s margin or whether the agreement must be declared invalid.
- Case C-607/25 against the Bank (the question concerns an agreement concluded after the effective date of the BMR and the mortgage loan act) – the Court asks whether national legislation laying down the method for fixing the variable interest rate as the value of the reference index and the amount of the margin ensures effective balance between the parties to the agreement where the provisions of national law do not set any maximum limits on the permitted increase in the value of the reference index and in the amount of the margin during the lifetime of the agreement, and the maximum interest rate permitted under provisions of national law governing maximum contractual interest rates may be changed throughout the lifetime of the agreement.
- Case C-630/25 against PKO BP SA (agreement concluded before the effective date of the BMR and the mortgage loan act) – the Court asks whether the requirement under Directive 93/13 to phrase the provisions of an agreement in a simple and understandable way requires the bank to inform the consumer of the entity which is providing the benchmark forming the basis of the interest rate on the loan and the detailed rules setting out the method for fixing the benchmark (in particular, whether the bank is required to present the consumer with the regulations containing those rules for fixing the benchmark and whether the bank is required to make the consumer aware that that benchmark is calculated on the basis



of declarations by a group of banks and not on the basis of actual market transactions). Furthermore, the Court asks whether it is possible to regard as unfair a contractual term setting the interest rate on a loan that uses a benchmark which is calculated on the basis of declarations by a group of banks and is not defined in provisions of national or EU law, with no State authority supervising the manner in which that benchmark is provided, and which does not reflect the actual costs of financing the loan.

Court proceedings concerning claims of investment fund members in connection with the function of investment fund depositary

Up to 31 December 2025, the Bank received in total 197 individual claims and 6 claims in collective proceedings lodged by investment fund members in connection with the function of investment fund depositary (including the investment fund depositary function performed by Raiffeisen Bank Polska S.A.).

The total amount of the claims is PLN 211,221 thousand. The total provisions are PLN 3,739 thousand.

The first two collective claims were filed by members of the Retail Parks Fund of Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych w likwidacji (formerly Fundusz RPF) respectively on behalf of 397 members with claims at PLN 96,221 thousand and on behalf of 181 members with claims at PLN 25,302 thousand.

Other collective claims are to establish the Bank’s responsibility for its actions as depositary of the following funds: (3) PSF 2 Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (filed on behalf of 17 fund members; claims value not specified), (4) PSF Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (filed on behalf of 81 fund members; claims value not specified) (5) EPEF Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (filed on behalf of 42 fund members; claims value PLN 128 thousand) and (6) PSF Lease Fundusz Inwestycyjny Zamknięty Aktywów Niepublicznych (filed on behalf of 38 fund members; claims value PLN 8,988 thousand).

The claims raised focus in particular on undue performance by Raiffeisen Bank Polska S.A. and subsequently the Bank of obligations to ensure that the net asset value of the fund and the net asset value per investment certificate are calculated in accordance with the law and the investment fund statute and of the obligation to check the compliance of the investment fund with laws governing investment funds and with the statute. The Bank takes the view that the claims of the fund members against the Bank are unfounded.

Up to 31 December 2025, a total of 27 non-final judgments of first instance courts and 2 legally valid judgments were passed:

- 1 legally valid judgment unfavourable to the Bank (in the case of the InMedica fund, the Court awarded PLN 64 thousand to the plaintiff due to incorrect diversification of fund assets);
- 1 legally valid judgment favourable to the Bank (in the case of the InMedica fund, the Court dismissed the claim in its entirety as the criteria of the Bank’s liability for damages were not met);

- 27 judgments favourable to the Bank (claims of individual fund members were dismissed as the criteria of the Bank’s liability for damages were not met).

Court proceedings concerning free credit sanction referred to in Article 45 of the Consumer Credit Act of 12 May 2011 (‘u.k.k.’)

The institution of free credit sanction is regulated in Article 45 of the Consumer Credit Act, according to which, in the event of a breach by the creditor of the provisions of the Act 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 within the time limit and in the manner agreed in the credit agreement, and if no such manner has been agreed, shall repay the credit in equal instalments, payable monthly, from the date of the conclusion of the credit agreement. Pursuant to Article 45(5) of the Consumer Credit Act, the entitlement to the free credit sanction expires one year after the execution of the credit agreement.

The first lawsuits related to customers’ use of the free credit sanction started to be received by the Bank in 2021. As at 31 December 2025, the Bank received 1,456 lawsuits with a total litigation value of PLN 35,099 thousand.

As at 31 December 2025, the provisions stood at PLN 1,491 thousand.

The Bank disputes the validity of the claims raised in these cases.

The jurisprudence to date is overwhelmingly in favour of the Bank.

Out of all the cases pending against the Bank: 943 are at first instance, 217 are at the second instance stage, while 296 have been finalised.

The use of the free credit sanction is also raised in the Bank’s debt enforcement proceedings. As at 31 December 2025, the plea was raised in 64 such cases.

Legal issues concerning the free credit sanction are the subject of numerous preliminary questions referred by Polish courts to the Court of Justice of the European Union (CJEU) concerning:

- the admissibility of interest on non-interest credit costs and the information obligations incumbent on financial institutions in this regard (C-566/24, C-744/24 and C-473/25),
- the interpretation of the one-year time limit for declaring use of the free credit sanction (C-566/24),
- the scope of the consumer’s information on the early repayment procedure (C-566/24, C-831/24) and the consumer’s right of withdrawal (C-566/24),



- examination by the court of its own motion of the creditor’s infringement of provisions other than those specified in the declaration of use of the free credit sanction (C-831/24),
- the application of the free credit sanction in the light of the principle of proportionality (C-566/24, C-831/24, C-684/25),
- the mutual relation of unfair terms of contracts and the free credit sanction (C-429/25, C-684/25) and information obligations of the Court versus the consumer in this regard (C-684/25),
- the admissibility of the free credit sanction where the financial institution formally performed the information obligation but the information provided to consumers was erroneous or unclear (C-473/25),
- the admissible method of phrasing the modification clause on fees and commissions reserved in the agreement and the grounds for the free credit sanction in the case of minor irregularities to this extent which do not affect the consumer’s decision to enter into the agreement (case C-684/25).

On 24 October 2024, the Court of Justice (EU) passed 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 (“Directive 2008/48”) allow the Member States to introduce various sanctions for failure to carry out a consumer credit assessment and for breach of the information obligations set out in the Directive. The CJEU did not analyse the Polish legislation or identify a specific sanction for breaching 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 a free credit sanction for a bank’s breach of its obligation to examine the consumer’s creditworthiness.

On 13 February 2025, the CJEU passed its judgment in case C-472/23 concerning the impact of an overstated annual percentage rate of charge (due to terms providing for interest on non-interest costs being declared unfair) on an infringement of the information obligation by the creditor which may result in the application of the free credit sanction, the rules for phrasing of clauses providing the terms of adjusting fees and commissions, the proportionality of national legislation providing for a uniform sanction for each infringement of information obligations. The CJEU ruled that:

1. the fact that a credit agreement refers to an annual percentage rate of charge, which proves to be overstated because certain terms of that agreement are subsequently found to be unfair, does not constitute, in itself, an infringement of the creditor’s obligation to provide information which may result in the application of the free credit sanction;
2. the provisions of the loan agreement which provide for a change in the fees paid under the agreement should be worded in a clear and understandable way so that a reasonably well-informed and reasonably observant and circumspect consumer is in a position to ascertain whether circumstances justifying an increase in the costs have arisen and their effect on those costs;
3. the principle of proportionality of sanctions does not preclude national legislation which provides for a uniform penalty in the event of an infringement of the creditor’s information obligation, consisting of depriving the creditor of its right to interest and charges, irrespective of the individual level of seriousness of such an infringement, where that infringement is capable of calling into question the possibility for the consumer to assess the extent of his or her liability.

On 9 October 2025, the CJEU passed a judgment in case C-80/24 concerning the admissibility of a claim assignment arising from a consumer credit contract and the obligation of the court to examine the assignment of its own motion to check whether its terms are unfair. The CJEU ruled that Directive 2008/48 does not preclude national legislation that allows a consumer to assign a claim arising from the infringement of a right conferred on him or her to a third party which is not a consumer and that Directive 93/13 must be interpreted as meaning that a national court is not required to examine of its own motion the unfairness of a term in a claim assignment agreement concluded where the dispute does not concern that assignment agreement, but the consumer’s claim against that seller or supplier.

The interpretation of the provisions on the free credit sanction is also the subject of legal issues referred for consideration by the Supreme Court, concerning: the obligation of the court to examine of its own motion all circumstances which justify the application of the free credit sanction (including other than those indicated in the content of the declaration submitted by the consumer on the use of the free credit sanction), the interpretation of the one-year time limit for the submission of the declaration on the use of the free credit sanction, the mutual relation of unfair terms and the free credit sanction, as well as the admissibility of interest on non-interest costs and the possibility of applying the free credit sanction on this account (ref. III CZP 3/25 and III CZP 15/25). The Supreme Court has suspended these cases as long as the cases referred by Polish courts to the CJEU are pending.

Compliance with other regulations

In 2025:

- no court or administrative proceedings concerning behaviours infringing free competition or antitrust regulations were initiated against the Bank or the Group,
- in the area of personal data protection, the Group companies did not receive any substantiated complaints regarding data leaks, theft or loss,
- no instances of non-compliance with regulations and/or voluntary codes relating to marketing communications (including advertising, promotion and sponsorship) were recorded,
- no monetary fines or non-financial sanctions for non-compliance with environmental laws and/or regulations were recorded.

Selected changes to legislation applicable to the banking sector

Changes which took effect in 2025

- Act of 26 April 2024 on ensuring that economic operators comply with accessibility requirements for certain products and services;
- Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience for the financial sector and amending Regulations (EC) No 1060/2009, (EU) No 648/2012, (EU) No 600/2014, (EU) No 909/2014 and (EU) 2016/1011;



- Act of 25 June 2025 amending certain acts in connection with ensuring the digital operational resilience of the financial sector and the issuance of European green bonds (Journal of Laws 2025, item 1069);
- Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (the Artificial Intelligence Act);
- Act of 20 December 2024 on credit servicers and credit purchasers (Journal of Laws 2025, item 146).

Events after the balance sheet date



January 2026

- 7.01. – Registration in 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 the Bank on 27 November 2025.

February 2026

- 11.02. – Intention of the Bank’s Management Board regarding the dividend payment from the 2025 net profit

The Management Board of the Bank announced that it will request the General Meeting to adopt a resolution allocating approximately 50% of the Bank’s standalone net profit for 2025 to dividend distribution.

As at the date of providing this information, the Bank meets the criteria and requirements of the Polish Financial Supervision Authority (“KNF”) that allow for the payment of up to 75% of the 2025 profit in the form of a dividend; however, the Bank has not yet received an individual dividend recommendation from the KNF.

The proposed dividend amount takes into account the Bank’s current financial position and its development plans.



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 2025 and the Consolidated Financial Statements of the BNP Paribas Bank Polska S.A. Group for the year ended 31 December 2025 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 Group.
- The Management Board’s Report on the Activities of the BNP Paribas Bank Polska S.A. Group in 2025 (including the Report of the Management Board on the Activities of BNP Paribas Bank Polska S.A. in 2025 and the Sustainability Statement of the BNP Paribas Bank Polska S.A. Group for 2025) provides a true picture of the development, achievements and situation of the 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 2025.

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 and to provide assurance for sustainability reporting in accordance with applicable 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 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 2025 and the Separate Financial Statements of BNP Paribas Bank Polska S.A. for 2025 (decision of the Supervisory Board of 15 September 2023),
- provide assurance for the sustainability reporting of the BNP Paribas Bank Polska Group for 2025 (decision of the Supervisory Board of 22 September 2025).

The Management Board confirms that Ernst & Young and the members of the audit and assurance team met the all the conditions of impartiality and independence necessary to prepare an independent audit report on the annual financial statements and the annual consolidated financial statements and assurance of sustainability reporting in accordance with applicable regulations, professional standards and professional ethics.

The Bank’s Management Board declares that the Bank complies with the applicable legal provisions concerning the rotation of the audit firm and the key auditor and mandatory grace periods and that the Bank has in place internal regulations in this regard including:

- the "Policy on the selection of the audit firm at BNP Paribas Bank Polska S.A.",
- the "Procedure for the selection of the audit firm at BNP Paribas Bank Polska S.A.",
- 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.

4.03.2026	Przemysław Gdański President of the Management Board	<i>signed with a qualified electronic signature</i>
4.03.2026	Małgorzata Dąbrowska Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
4.03.2026	Wojciech Kembłowski Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
4.03.2026	Piotr Konieczny Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
4.03.2026	Magdalena Nowicka Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
4.03.2026	Volodymyr Radin Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>
4.03.2026	Natalie Yacoubian Vice-President of the Management Board	<i>signed with a qualified electronic signature</i>