



Management Board Report on the activity of Bank Millennium S.A. and Capital Group of Bank Millennium S.A. 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.

This document is not the official version of the Management Board Report on the activity of Bank Millennium and Capital Group of Bank Millennium of 2025. Official Management Board Report on the activity of Bank Millennium and Capital Group of Bank Millennium of 2025 was prepared in accordance with the ESEF requirements.

Some data and statistics presented in this document are based on management data and may differ from values presented in Annual Consolidated Financial Report of the Bank Millennium S.A. Capital Group for 12-month period ending 31st December 2025.

Table of contents:

Part I Management Board's Report on the Activity	4
1. Brief description of Bank Millennium and Bank Millennium Group	8
2. Brief description of results of BM Group in 2025	11
2.1 2025 results in brief	12
2.2 FX-mortgage portfolio related costs in a downtrend	15
3. Information for investors	18
3.1 Share price performance	18
3.2 Bank Millennium's ratings	19
3.3 Investor relations	20
3.4 Dividend policy	21
4. Market conditions and macro risk factors	22
4.1 Macroeconomic environment	22
4.2 Factors of uncertainty for the economy and Bank Millennium Group	24
5. Other important considerations	25
5.1 Legal risk related to the portfolio of foreign currency mortgage loans	25
5.2 Legal risk related to the portfolio of mortgage loans in PLN	28
5.3 Legal risk related to the portfolio of consumer loans	28
6. Polish banking sector and Bank Millennium/Bank Millennium Group's position	30
6.1 Polish banking sector in 2025	30
6.2 The Bank's and Bank Millennium Group's position on the market	32
7. Strategy and business development prospects	33
7.1 Strategy implementation in 2025	33
7.2 Business outlook for 2026	34
8. Financial situation	36
8.1 Profit and loss account	36
8.2 Results of business segments	42
8.3 Balance sheet and off-balance sheet items	45
9. Presentation of business activity	54
9.1 Innovation and highest quality of positive customer experience	54
9.2 Retail banking	56
9.3 Corporate banking	63
9.4 Subsidiaries' activity	70
10. Main awards and achievements in 2025	74
11. Risk management	77
11.1 Risk management overview	77
11.2 Capital management	81
11.3 Credit risk	85
11.4 Other risks	99
12. Human resources management	105
12.1 Human resources (HR) policy	105
12.2 Employment and personnel costs	109
12.3 Remuneration policy	110
13. Principle of corporate governance at Bank Millennium	115
13.1 Statement on the principles of corporate governance applied in 2025	115
13.2 Shareholders and General Meetings of Shareholders	116
13.3 Supervisory Board	118
13.4 Management Board	130
13.5 Internal control system and external auditor	136

14.	Additional information	141
14.1	Information required based on article 141 of the banking law	141
14.2	Significant agreements and material agreements with the central bank or supervisory authorities	141
14.3	Information on proceedings at court, before a competent arbitration tribunal or a public administration body	141
14.4	Major equity Investments in entities outside the Bank Millennium Group	141
Part II	Sustainability Reporting	143
15.	General Disclosures (ESRS 2)	144
15.1	Basis of preparation	144
15.2	Business model and value chain	145
15.3	Sustainability strategy	148
15.4	Sustainability management	151
15.5	Double materiality assessment	160
16.	Climate change (ESRS E1)	173
16.1	Material impacts, risks and opportunities related to climate change	173
16.2	Bank Millennium Group's transition plan for climate change mitigation	173
16.3	Management of impacts, risks and opportunities	180
17.	Bank Millennium Group Employees (ESRS S1)	204
17.1	Workforce strategy	204
17.2	Workforce characteristics	212
17.3	Employment security, friendly place to work	217
17.4	Adequate compensation	221
17.5	Working time	224
17.6	Employee health and safety	225
17.7	Promoting diversity and equal employee compensation	228
17.8	Training and development	232
17.9	Countering violations in the workplace	237
17.10	Privacy	239
18.	Workers of the Bank Millennium Group's value chain (ESRS S2)	241
18.1	Strategy	241
18.2	Management of impacts, risks and opportunities	242
18.3	Metrics and targets	244
19.	Bank Millennium Customers (ESRS S4)	245
19.1	Customer strategy	245
19.2	General customer engagement processes	248
19.3	Respect for human rights in customer relations	249
19.4	Safety of deposited funds	250
19.5	Privacy	254
19.6	Access to (high-quality) information	257
19.7	Responsible marketing practices	261
19.8	Non-discrimination (inclusive banking)	263
19.9	Remediation of negative impacts	266
20.	Business conduct (ESRS G1)	268
20.1	Corporate culture and business ethics	269
20.2	Anti-corruption	270
20.3	Whistleblower reporting and protection	272
21.	EU Taxonomy disclosures (Article 8 of Regulation (EU) 2020/852)	274
21.1	Legal basis for the Group's reporting obligations under the EU Taxonomy	274
21.2	Contextual information on Key Performance Indicators, including the scope of assets and activities covered by KPIs	275

21.3	Description of alignment with EU Taxonomy in the Group's business strategy, product design processes and engagement with customers and business partners	277
21.4	Changes compared to the data presented last year	277
21.5	Quantitative disclosures prepared in accordance with the templates specified in Annex VI to Regulation 2021/2178 (disclosures for 2025)	278
22.	Appendices	293
22.1	IRO-2 List of disclosure	293
22.2	Table consistent with Appendix B	296
Part III	Statement of the Management Board	305
	Glossary	307



Part I Management Board's Report on the Activity

Dear Ladies and Gentlemen,



I am pleased to present the 2025 Annual Report of the Bank Millennium Group. It was an extremely intense time for us, the first year of implementation of our **"Strategy 2028 - Value and Growth"** strategy. We achieved **record-breaking financial results**, in a moderate stabilisation of the macroeconomic environment that can be observed on the market. We strengthened our solid position in the area of retail banking, made a breakthrough in corporate banking. In 2025 we reached 3 million users of the mobile application and online banking. The value of newly granted loans to companies increased significantly, which gives us an important place among the largest banks in Poland in terms of the pace of development in the corporate banking segment. We continued to develop our IT systems and applications, and also took care of the security of systems and customer education. It was an important period for

strengthening the Bank's capital and position in ratings. We improve efficiency, optimise processes, which allows us to achieve business goals more effectively.

In 2025, the Bank Millennium Group achieved a net profit of a record amount of PLN 1,202 million, which means an increase of 67% y/y and an ROE of 14.3%. The solid result was supported by an overall stable result on core business, higher non-interest income, lower credit risk impairment losses and a slightly lower CIT burden.

In the whole of 2025, the balance sheet total increased by 12% y/y, mainly due to a 12% increase in deposits. The total loan portfolio grew moderately, by 2% y/y, which translated into a further increase in the liquidity surplus. The loans-to-deposits ratio fell to an all-time low of 58% at the end of 2025.

The corporate segment achieved exceptional results. In the whole of 2025, the value of newly granted corporate loans increased by 135% y/y, exceeding PLN 8 billion, of which over 40% were investment loans.

The risk of the historical FX mortgage portfolio has been further reduced (the active FX portfolio currently accounts for less than 1% of total loans). The inflow of new lawsuits decreased significantly, and the number of settlements remained stable (4.5 thousand in 2025). All this allows us to think with cautious optimism about the near future and the end of the Swiss franc saga.

Thanks to the enormous concentration and commitment of our employees, we have once again triumphed in rankings, competitions and on industry lists. We won the title of **Golden Bank 2025** for the best omnichannel quality of service in the Golden Banker ranking. In the **"Newsweek's Friendly Bank"** survey, we won the double crown for the third time in a row, winning in both categories – "Traditional Banking" and "Remote Banking". We took first place in the "Best Bank for the Affluent" ranking and moved up to second place in Forbes' "Best Bank for Businesses" ranking. Bank Millennium has been awarded the title of Top Employer Poland 2025. Once again, we also won the Reliable Employer emblem. Global Finance magazine honoured us with the title of **The Best Bank in Poland for 2025**. For the twelfth time, we were among the companies with the title of Service Quality Star. These are just the most important awards and distinctions. On behalf of the Management Board of Bank Millennium, I would like to thank each of my colleagues who contribute to the fact that we can celebrate such great achievements and successes together.

As a Bank and the Bank Millennium Foundation, we are actively involved in social life through cultural initiatives, financial education and **volunteering**. In 2025, Bank Millennium Group employees devoted over 2300 hours to various volunteering initiatives. As part of 54 projects, they helped children, young people, the elderly and those in need, animals and the environment. A record-breaking year of volunteering, with the Bank Millennium Foundation celebrating its 35th anniversary, was preceded by an equally spectacular involvement in the **Our People** programme. The internal sports initiative, implemented for years now, which is to encourage physical activity and maintaining a healthy lifestyle, gathered nearly 1800 participants.

After an excellent 2025 - the first year of implementation of the **“Strategy 2028 – Value and Growth”** strategy - with concrete results already visible, we are entering 2026 with real excitement. We invariably focus on the quality of our services and positive customer experience. We see the challenges but also the opportunities that lie ahead. We are sure that thanks to the commitment of the entire organisation, we can make use of them.

Please enjoy reading the Report.

A handwritten signature in blue ink, which appears to read "João Bras Jorge".

João Bras Jorge

Chairman of the Management Board of Bank Millennium

BANK MILLENNIUM GROUP IN 2025

Key financial indicators



NET PROFIT / ROE

PLN1,202mn
ROE 14.3%



COST-TO-INCOME

36.9% (reported)
35.8% (adjusted)



TOTAL ASSETS

PLN156bn



CAPITAL RATIOS

T1 13.7%
TCR 15.1%

Key operating statistics



OUR CLIENTS

**3.3mn active retail
clients**
**above 39k active
corpo/SME clients**



OUR EMPLOYEES

6,906 FTEs



ONLINE USERS

**3.1mn active
digital users**



TRANSACTIONS

Digital share:
88% in cash loans
95% in term deposits

Basic facts for investors



MARKET CAP.*

PLN20.2bn
(EUR4.8bn)



SHARE PRICE*

PLN16.6
+87% y/y



INDICES

WIG
WIG30
mWIG40
WIG Banks
MSCI Poland



RATINGS

Moody's: Baa1
(adjusted BCA:
baa3) Stable outlook

Fitch: BBB- (VR:
bbb-) Stable outlook

(*) on 30.12.2025

1. Brief description of Bank Millennium and Bank Millennium Group

Bank Millennium S.A. ('Bank Millennium', 'Bank') was established in 1989 as one of the first Polish commercial banks. It is now one of the top 7 commercial banks in Poland in terms of assets and offers its services to all market segments via a network of 590 branches (including 353 own branches and 237 franchise branches), a network of personal advisors as well as electronic and mobile banking.

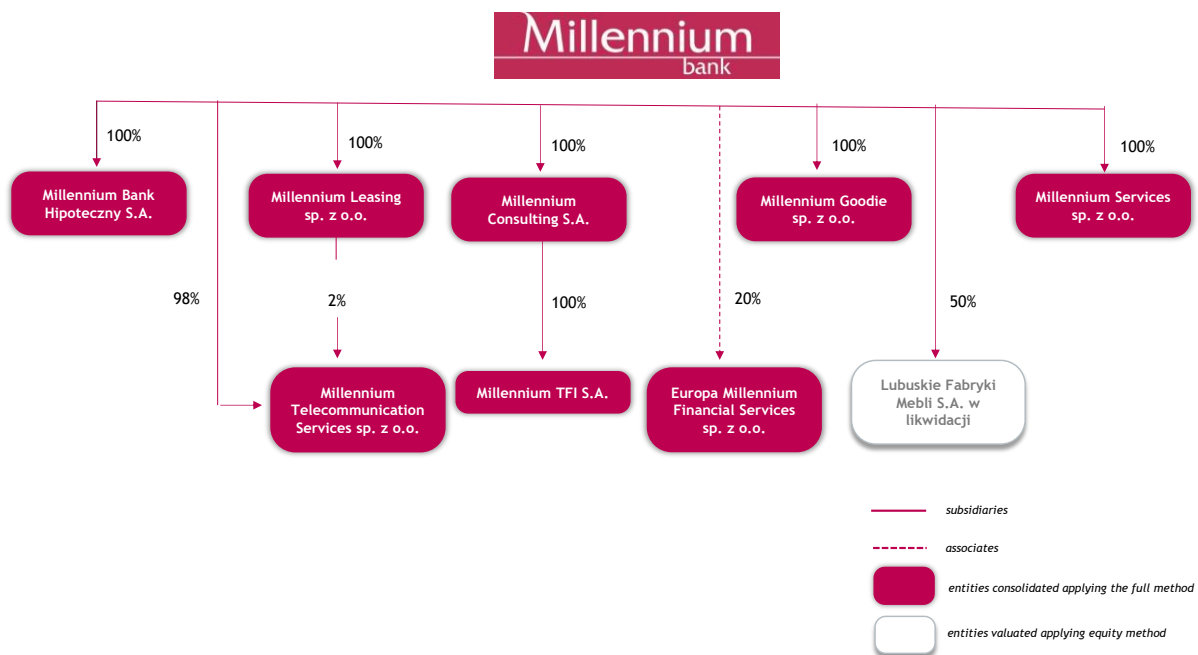
Ever since the start of its activity it has been a trendsetter in Polish banking. For example it was the first Bank to be listed on the Warsaw Stock Exchange and issued the first payment card on the Polish market. The Bank satisfies most stringent standards of corporate governance; it implements social programmes to support culture development as well as education of the youth.

Bank Millennium is a market leader in the area of innovations understood to mean state-of-the-art technology and process improvements. Innovation in Bank Millennium is part of its business strategy.

Bank Millennium, together with its subsidiaries, forms Bank Millennium S.A. Capital Group ('BM Group', 'Group') - one of the most innovative and comprehensively developing financial groups in Poland – employing in total 6,517 persons (FTE).

Bank Millennium Group's structure (31.12.2025)

Subsidiaries and associates



The most important companies of the Group are: Millennium Leasing (leasing activities), Millennium TFI (investment funds) and Millennium Bank Hipoteczny (obtaining long-term financing through issuance of covered bonds). Since 2016, Millennium Goodie together with the Bank has been running an innovative smartshopping platform based on advanced technology. The offer of the above-mentioned companies complements the services and products offered by the Bank. The Bank remains a 20% shareholder of Europa Millennium Financial Services sp. z o.o. together with Towarzystwo Ubezpieczeń na Życie Europa S.A. and Towarzystwo Ubezpieczeń Europa S.A. and continues long-term cooperation in the area of bancassurance under agreements concluded with the company's shareholders regarding the insurance distribution model.

Business model

Bank Millennium operates with the strong ambition of embracing innovation, digitally delivering top-quality services, supported by well-prepared human interactions, to be the primary bank for individuals and companies in Poland. The core pillars of business model are defined by segments and operating model enablers.

Key segments, where Bank Millennium competes, are:

in retail banking:

- **Mass individual clients** – we are building primary relationship based on daily banking, customer assets and selective lending with keeping top-quality and digital first approach
- **Affluent clients** – we are scaling the segment by upselling from mass individual client's market and offering a digital affluent service, strengthened by Relationship Managers, primarily operating remotely, who focus on savings and investments solutions
- **SOHO clients** – we are acquiring private entrepreneurs (Sole Traders with annual revenues up to 10M PLN) and building primary relationships mainly through digital offer with remote support and sales

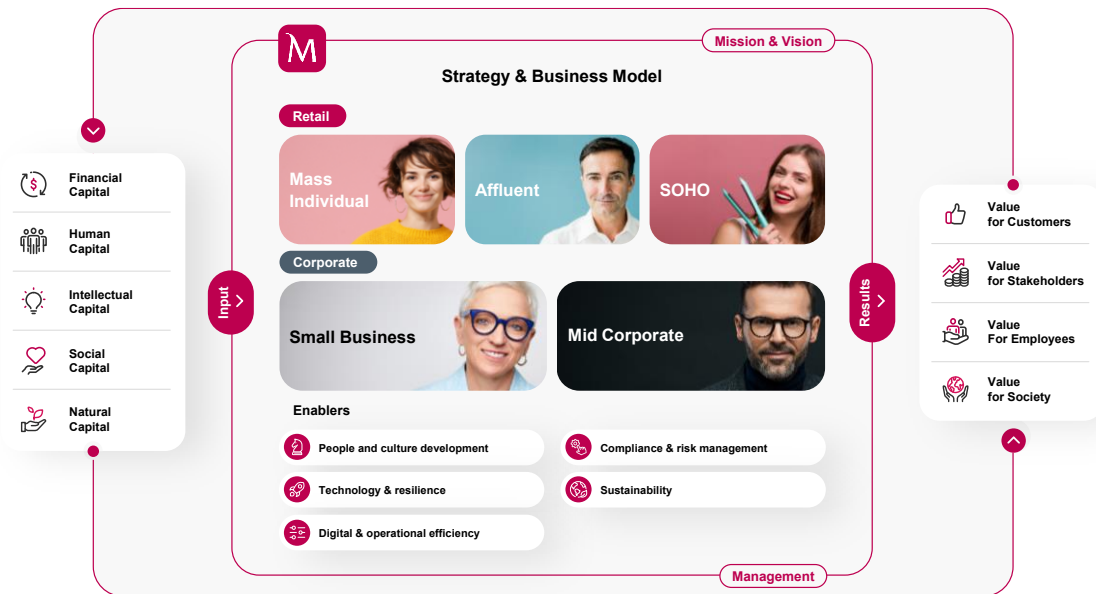
and in corporate banking:

- **Small Business clients** – we are acquiring small businesses (companies with annual revenues up to 20M PLN) and building primary relationships with small companies with digital-enabled, standardised credit and daily banking proposition supported by remote Relationship Managers
- **Mid corporate clients** – we are a challenger player, significantly driving portfolio growth with focus on investment loans and leasing

Key enablers supporting effective business model are:

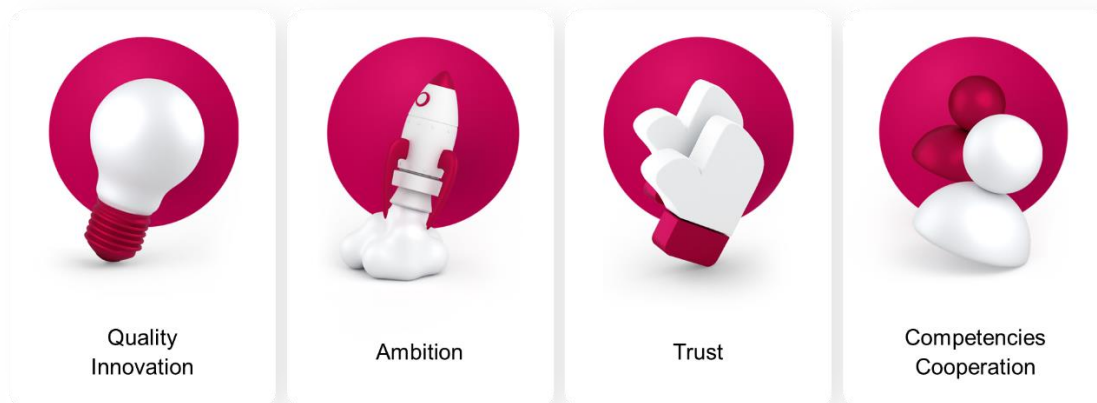
- **People management and culture development** to ensure market leading offer for talents and continue building a top work environment
- **Technology & resilience** to implement innovative technological solutions, incl. AI, addressing customers' needs and ensuring highest cybersecurity standards
- **Digital & operational efficiency** to continue digitalisation of clients relation and foster balanced organisation with proper resources allocation to sustain value creation
- **Compliance & risk management** to maintain sound risk management and understanding of regulatory environment, with capital generation and allocation sustaining business growth
- **Sustainability:** to continue enacting sustainability initiatives and explore business opportunities from ESG and sustainable transition.

Bank Millennium's business model



The business model is founded on **key values**: building relationships based on trust, a passion for quality and innovation, people development and promoting cooperation as well as the ambition to always aim higher.

The Bank Millennium Group's Values



2. Brief description of results of BM Group in 2025

2024 delivered solid core performance and steady profitability, but 2025 marked a true leap forward. Despite rapidly falling market interest rates, Bank Millennium Group achieved a 67% surge in net profit to record PLN1,202 million and lifted ROE by over 4 percentage points to 14.3%. This strong momentum came even as the Bank continued to bear substantial, though sharply decreasing, costs related to the legacy FX-mortgage portfolio. Balance sheet of the Group grew by PLN17 billion (+12% y/y) to nearly PLN156 billion.

The year 2025 was the first year of implementation of the Bank Millennium strategic plan “Strategy 2028 - Value & Growth”, which sets out the key development directions for a four year perspective. The main assumptions of the applicable plan include uninterrupted development in the retail area, strengthening the Bank’s position in the segment of small, medium and large enterprises, and improving profitability. The Bank focuses on digitalisation, development of its offering, including investment and savings products, as well as consistent enhancement of customer service.

In 2025, Bank Millennium consistently implemented strategic initiatives in the retail banking segment, enhancing its product offering, digital channels, and process efficiency. The Bank introduced, among others, recurring BLIK payments and new mobile app features such as cash ordering, identity confirmation for public services, and eSIM purchase. The number of active digital users exceeded 3 million, marking significant progress toward the strategic goal of increasing digital customer activity. The Bank expanded its digital payment offering and launched the “Your Goal” Savings Account as well as an ECO promotion for mortgage loans, enabling customers purchasing energy-efficient properties to benefit from reduced interest rates. The affluent customer segment was strengthened through the introduction of the Millennium 360° Prestige account. Strong commercial activities contributed to an increase in deposits to over PLN 98 billion (+12% y/y) and a rise in Millennium TFI assets to more than PLN 11 billion (+45% y/y). The Bank also carried out its first marketing campaign targeting young customers and launched a pilot of advanced marketing personalization.

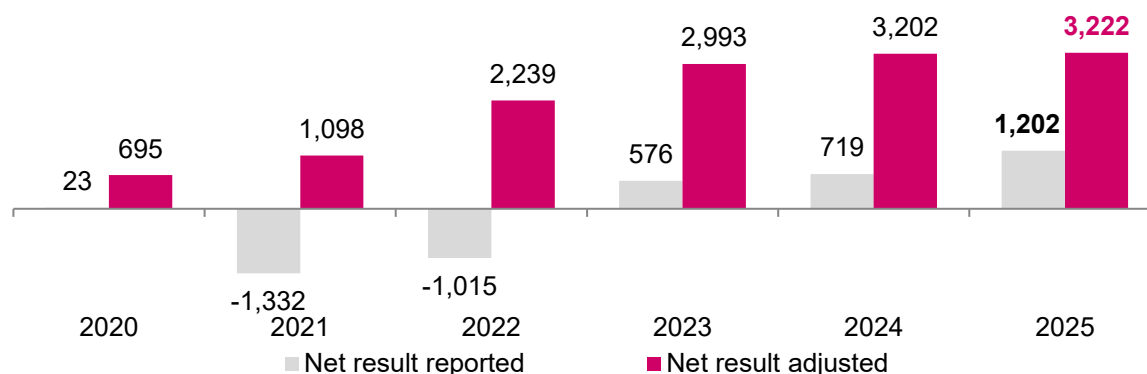
In corporate banking, Bank Millennium strengthened its position by expanding its offering and implementing new technological solutions. Key initiatives included the launch of Millenet Link Lite, a pilot of a simple loan for companies, the introduction of the Development Loan and KUK green guarantees, as well as enabling payments directly from foreign currency accounts without conversion and providing fully remote leasing agreement signing. The Bank also offered a carbon footprint calculator aligned with the GHG Protocol, supporting companies in preparing environmental reports with emission-reduction recommendations. Work began on building a new small-business segment for companies with annual revenues of up to PLN 20 million, contributing to the growth of the corporate loan portfolio from PLN 14.7 billion to PLN 17.5 billion (+19% y/y).

Bank Millennium confirmed its strong market position, ranking first in traditional banking for the third consecutive year and maintaining the top position in remote banking for the fourth year in the “Newsweek Friendly Bank” ranking. It was also recognized as the “Best Bank for Affluent Clients” and ranked second in the “Business-Friendly Bank” category.

2.1 2025 results in brief

BM Group delivered a net profit of PLN 1,202 million in 2025, marking a 67% y/y increase and an ROE of 14.3%. The year was characterized by a limited number of extraordinary items, largely confined to costs linked to the FX-mortgage portfolio. These costs, totalling PLN 2,020 million after tax, declined by 21% y/y and 34% on a pre-tax basis. Excluding them, the underlying net profit would have reached PLN 3,222 million.

Annual net results: reported and adjusted* (PLNmn)



(*) Net result w/o FX-mortgage related costs but since 2H22 with hypothetical banking tax between July'22 and May'24.

Resilient core operating results despite declining market interest rates

Despite an environment of declining market interest rates increasingly shaping the performance of Polish banks, BM demonstrated strong resilience. In 2025, the average 3M WIBOR fell to 5.09% from 5.89% in 2024, yet the Group's average NIM contracted by only 34 bps to 4.01%. Combined with growth in interest-earning assets, this resilience supported solid core operating performance. Net interest income, the key growth driver in recent years, increased 4% y/y on a reported basis (2% excluding the impact of 2024 credit holidays). Core income rose 4% y/y, while operating income before provisions grew 3%. Operating expenses increased faster than revenues, with higher BFG fees accounting for roughly one-third of the overall opex delta. Even so, the cost-to-income ratio remained strong at 36.9%, with cost dynamics improving steadily from 2Q25 onward and by 4Q25 opex growth slowed to 11% y/y. Total risk charges dropped sharply by 26% y/y, materially boosting profitability. Credit risk charges decreased 19% y/y, while total FX-mortgage legal risk charges, including these related to the portfolio of former Euro Bank, declined 26% y/y.

Profit & Loss abridged <i>(PLN million)</i>	2025	2024	y/y	4Q25	3Q25	q/q
Net interest income	5 756	5 530	4%	1 438	1 446	-1%
Net commission income	775	777	0%	200	204	-2%
Core income	6 531	6 307	4%	1 638	1 650	-1%
Other non-interest income	406	214	90%	133	99	34%
Total operating income	6 936	6 521	6%	1 771	1 749	1%
Personnel costs	(1 356)	(1 197)	13%	(349)	(339)	3%
Other administrative costs*	(1 200)	(1 056)	14%	(311)	(288)	8%
Total operating costs	(2 556)	(2 253)	13%	(659)	(627)	5%
Impairment provisions and other cost of risk **	(250)	(310)	-19%	(57)	(113)	-50%
FX legal risk related cost	(2 104)	(2 850)	-26%	(534)	(485)	10%
Banking tax	(406)	(232)	75%	(105)	(101)	4%
Pre-tax profit	1 620	875	85%	415	424	-2%
Income tax	(418)	(156)	168%	(69)	(79)	-13%
Net profit – reported	1 202	719	67%	347	345	1%
Net profit – adjusted***	3 222	3 202	1%	875	743	18%
NIM	4.0%	4.4%	-0.3%	3.8%	3.9%	-0.2%
Cost/income reported	36.9%	34.5%	2.3%	37.2%	35.8%	1.4%
Cost/income <i>adjusted</i> ****	35.8%	30.8%	5.1%	38.0%	37.2%	0.8%
Cost of risk (bp)	30	40	-9	26	53	-28
ROE	14.3%	9.8%	4.5%	14.4%	15.0%	-0.5%

(*) Include depreciation and amortisation; (**) Impairment provisions for financial and non-financial assets including also fair value adjustment and loans modification effect; (***) Without extraordinary items, i.e. FX mortgage loan related costs/incomes (in legal risk provisions, operating cost and other operating income/cost including indemnity from Societe Generale and tax effects) and hypothetical banking tax until the end of May 2024 and negative impact of credit holidays (negative PLN113mn in 2024); (****) Without extraordinary income or cost and in periods shorter than a year with linear distribution of BFG resolution fund fee throughout the year

Strong deposit growth driving balance sheet expansion. Corporate portfolio up 20% y/y.

The balance sheet expanded 12% y/y, driven primarily by a 12% increase in deposits. Deposit mix improved, with term deposits falling to 31% at YE25 from 35% a year earlier. Total loan growth remained moderate at 2% y/y, contributing to a further increase in liquidity surplus. The loan-to-deposit ratio fell to a historic low of 58% (64% at YE24).

Loan-portfolio dynamics varied. The retail portfolio contracted 4% y/y as volume of mortgages declined 7% y/y, offsetting a 4% rise in non-mortgage consumer loans. Momentum in PLN mortgages improved significantly toward year-end. 4Q25 originations of PLN 1.7 billion represented over 40% of full-year production and marked the highest quarterly level since mid-2022. Cash-loan origination remained steady at circa PLN 1.8 billion per quarter, resulting in 4% y/y growth of originations in 2025 overall. The corporate portfolio delivered exceptional performance, rising 20% y/y, with corporate loans alone up 34%. In 2025, corporate loan originations increased 135% y/y to more than PLN 8 billion, over 40% of which were investment loans.

Overall asset quality remained strong. The NPL ratio fell below 4% for the first time, reaching 3.80% already outperforming the YE28 strategic target. Cost of risk declined to a historical low of 30 bps.

Key balance sheet indicators (PLN million)	31.12.2025	31.12.2024	y/y	30.09.2025	q/q
Loans to households	54 745	56 825	-4%	54 493	0%
Loans to companies and public sector	21 671	18 040	20%	20 125	8%
Total net loans to clients	76 416	74 865	2%	74 619	2%
Total assets	155 673	138 864	12%	152 597	2%
Deposits of individuals	98 379	87 567	12%	94 178	4%
Deposits of companies and public sector	32 429	29 690	9%	34 008	-5%
Total deposits	130 807	117 257	12%	128 186	2%
Impaired loan ratio*	3.8%	4.5%	-0.7 pp	4.2%	-0.4 pp
CET1 = T1	13.7%	14.8%	-1.1 pp	14.3%	-0.6 pp
TCR	15.1%	17.2%	-2.1 pp	15.9%	-0.8 pp

(*) Impaired loan ratio = impaired loans / total gross loans

Customer acquisition steadily up, on track towards '28 target

The retail client base continued its upward trend, in line with strategic objectives. In 2025, the Bank added 145,000 active clients (+5%), reaching 3.271 million at year-end. Active digital clients increased to nearly 3.1 million (from 2.9 million at YE24), while mobile-active clients grew to nearly 2.9 million (from 2.7 million). The share of "mobile-only" clients in total digital clients rose to 74% from 68%.

Investment product volumes expanded 40% y/y to nearly PLN 15.5 billion, with Millennium TFI funds exceeding PLN 11 billion (+45% y/y).

FX-mortgage book risk gradually abating

The orderly reduction of the risk related to the legacy FX-mortgage portfolio continued. At YE25, the total legal FX-mortgage book accounted for less than 1% of the gross loan portfolio, or slightly above 5% excluding legal-risk provisions.

New legal cases continued to decline. Slightly over 3,700 new claims were filed in 2025 versus more than 5,800 in 2024. The number of active lawsuits fell to below 16,700 (from nearly 21,900 at YE24), driven by a mix of final court decisions and settlements. Legal-risk provisions surpassed 160% of the gross active book.

Settlement activity remained stable, with nearly 4,500 agreements signed, matching 2024 levels. To date, more than 30,000 settlements have been concluded, representing nearly half of all FX mortgages outstanding at end-2019, when the issue escalated. The regulator acknowledged the progress of tackling the FX-mortgage related risk in early 2025 by revoking the P2R buffer.

Solid capital ratios and ample capital and MREL buffers

Capital ratios remained strong in the period (group TCR at 15.1%, T1 at 13.7% at YE25) despite the significant impact of introduction of CRR3 and growth of risk weighted assets driven by accelerating growth of business and lowering contribution from SRTs. CRR3 impact largely fed through higher operating risk requirement (largely due to inclusion of preceding 3-year average FX-mortgage related costs) which during the year nearly doubled to 22% of total capital requirement at YE25.

At YE25, the T1 surplus over the required minimum requirement stood at 393 bps (Group) and 472 bps (Bank solo), while TCR level the surpluses were at 336 bps and 429 bps respectively. These slightly

narrower buffer reflect the increase of the countercyclical buffer (CCyB) to 1 percentage point in September'25.

Recognition of 2H25 net profit in capital ratios (see comment on Management Board's intention with regard to 2025 net profit distribution in the "Dividend policy" section) would, *ceteris paribus*, add around 126 basis points to consolidated capital ratios, further widening the capital surplus.

Additionally, the Bank meet its current MREL targets with a significant surplus. At the end of December 2025, BM's MRELTrea stood at 24.5% while MRELtem at 8.3% vs. respective required levels of 19.1% and 5.9%.

Substantial and extraordinary P&L items

2025 saw a combination of both positive as well negative substantial and extraordinary items affecting the results. Of the positives ones, PLN28 million pre-tax gain on the sale of real estate was recognised in other operating income, revaluation of the stake in one of investments (PLN88 million pre-tax) was booked in results on financial assets and liabilities, a seasonal a settlement with a card company (PLN37 million) lowered administrative costs in 2Q25, while NPL sale (mostly cash loans and PLN mortgages) lowered cost of risk by a total of PLN166 million.

Of the negative items, FX-mortgage related costs again had a material negative impact on the results totalling PLN2,128 million pre-tax and PLN2,020 million after tax. Furthermore, PLN82 million provision for consumer protection related costs burdened other operating costs line. Finally, effective tax rate in 2025 was higher than in the preceding year due to a combination the low base effect (recognition of DTA related to FX-mortgages in 2024), banking tax paid in full year 2025 versus only partially in 2024, and finally lower tax deductibility of FX-mortgage legal risk provisions.

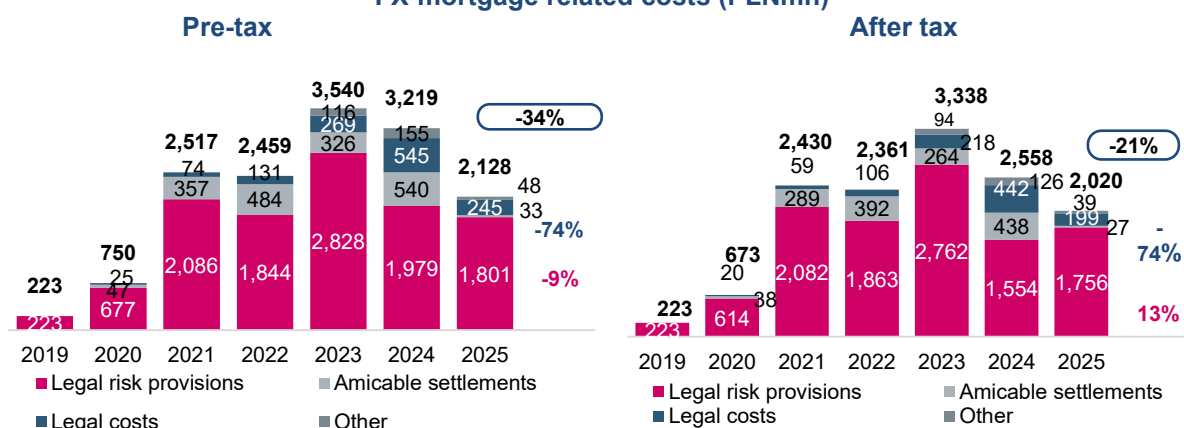
2.2 FX-mortgage portfolio related costs in a downtrend

Total costs related to FX-mortgage portfolio

Following presentational changes introduced in 1H25 financial statements, the bulk of FX-mortgage related costs are now presented in P&L line "FX legal risk related costs" with the balance included in other operating costs (legal costs) and other admin costs (chiefly costs of legal firms).

Total P&L costs related to FX-mortgage portfolio originated by Bank Millennium (legal risk provisions, costs of amicable settlements as well as legal and court costs, including legal representation costs or penalty interest) totalled PLN2,128 million in 2025 at the pre-tax level. Although 34% lower y/y, they continued to be a material drag on the core business of the Group. At the net profit the y/y contraction rate was lower - 21% - yet still material.

FX-mortgage related costs (PLNmn)



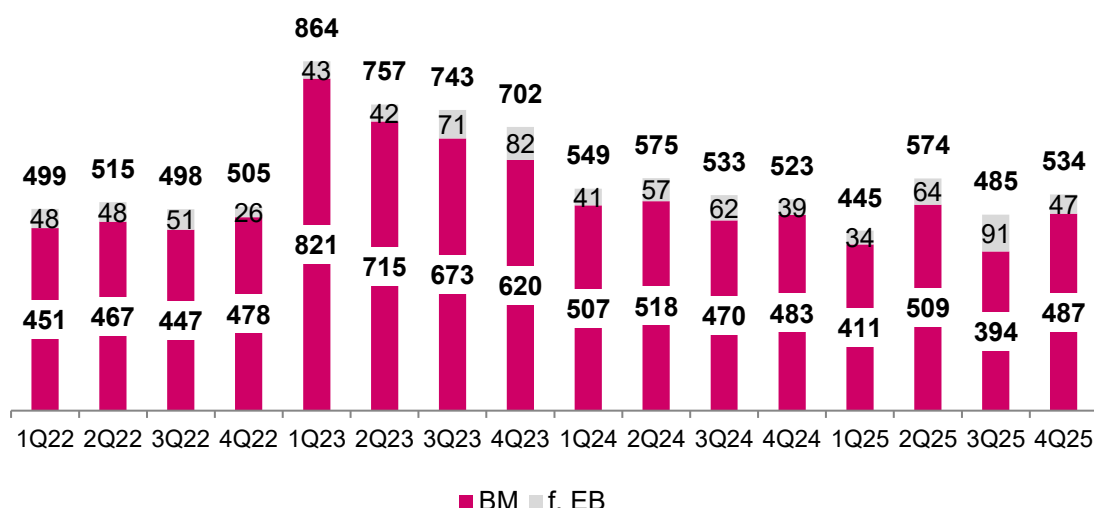
(*) without legal risk costs related to FX-mortgages originated by former Euro Bank

Legal risk provisions

Total cost of provisions against legal risk related to FX-mortgage portfolio ('FX-mortgage provisions') in 2025 amounted to PLN2,037 million pre-tax with PLN1,801 million (down 9% y/y) attributable to FX-mortgages originated by Bank Millennium. Post-tax 2025 cost of FX-mortgage provisions attributable to portfolio originated by Bank Millennium totalled PLN1,756 million vs. PLN1,554 million in 2024.

In 2025, further provisioning was driven by updated inputs into the Bank's provisioning methodology, with the vast majority of new provisioning reflecting factors not related to the inflow of court claims per se, such as additional costs incurred upon invalidation verdicts of the loan agreements and present value of future losses.

Quarterly provisions against legal risk of FX-mortgage book (PLNmn)



The methodology developed by the Bank of calculating provisions for legal risk involved with indexed loans is based on the following main parameters:

- the number of ongoing cases (including class action agreements);
- the number of potential future court cases: the Bank monitors customer behaviours, analyses their willingness to sue the Bank, including due to economic factors and applies the following assumptions:

- a. regarding active loans (i.e., loans with an outstanding balance), the Bank estimates that approximately 18% of them will neither sign an out-of-court settlement nor decide to file a lawsuit;
- b. regarding loans already fully repaid or converted to polish zloty, the Bank anticipates that approximately 4,7 thousand repaid loans — those which were not previously subject to a settlement — may result in future litigation initiated by the borrowers. The impact on the level of provisions of a change by 100 clients (assuming recent inflow structure) would be around PLN 14,4 million;
- (iii) the amount of the Bank's potential loss in the event of a specific court judgment (including statutory interest estimation significantly dependent on the period for which they are awarded);
- (iv) estimates involved with amicable settlements with clients, concluded in court or out of court.

At the end of December'25, the balance sheet value of provisions for the portfolio originated by Bank Millennium was at the level of PLN6,293 million (an equivalent of 163% of the grossed-up active FX-mortgage book) and at PLN820 million for the portfolio originated by former Euro Bank. The y/y change of the balance of provisions for loans originated by Bank Millennium (drop of PLN1,431 million) contrasted with the respective 12-month P&L charge of PLN1,801 million. This was mainly due to the much increased use of these provisions which amounted to PLN3,263 million during 2025. Allocated provisions, i.e. decreasing gross balance sheet value of the respective loan books, stood at PLN3,220 million for portfolio originated by Bank Millennium and PLN451 million for portfolio originated by former Euro Bank.

FX-mortgage portfolio

The pace of BM's FX-mortgage portfolio's contraction remained high with y/y contraction rate at 40% (in CHF terms, gross, without impact of allocated legal risk provisions). The share of total FX-mortgage book (gross loans less allocated legal risk provisions) in total Group's gross loans dropped to 0.9% at the end of December'25, while the share of FX-mortgage loans originated by BM dropped to 0.8%.

At the end of 2025, the Bank had 14,741 active mortgage FX-loans.

Legal and court costs

Legal, court costs and additional cost of final verdicts, booked in interest income, admin costs, other operating costs and partially in the newly presented P&L line, totalled PLN327 million before tax in 2025 and were much lower than the PLN1,240 million in 2024.

Results adjusted for FX-mortgage related costs

Summing it all up, excluding all FX-mortgage related costs in 2025 (PLN2,128 million pre-tax / PLN2,020 million after tax) the BM Group would post 2025 net profit of PLN3,222 million. This compares against adjusted 2024 net profit of PLN3,202 million.

More information about the risk related to the FX mortgage portfolio is presented further in the report in the "Legal risk related to foreign currency mortgage loans" section.

3. Information for investors

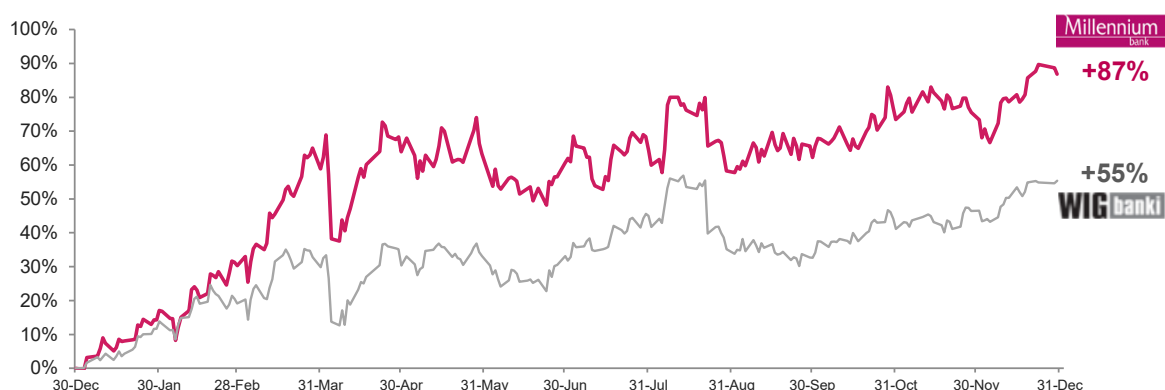
3.1 Share price performance

Global stocks were boosted in 2025 by robust corporate earnings, enthusiasm about AI and optimism about interest rate cuts from the Federal Reserve. Stocks stumbled into the end of the year, with the Dow, S&P 500 and Nasdaq each falling four days in a row to close out 2025. Nonetheless, it was year of healthy gains for the stock market.

The year 2025 on the Warsaw Stock Exchange was successful as well, especially for large companies that drove gains in the broad market index (WIG rose by 47.5%). It is worth noting that the domestic market managed to overcome the stagnation of the third quarter and regained strong momentum in the final months of the year, setting new records. The increase in the CIT tax for banks was a significant factor that negatively affected investor sentiment. The WIG-Banks index did not fully recover from the declines in August and September, but still ended the year with a strong 56% gain.

During the 12 months ending 31 December 2025, WIG broad market index and WIG20 index of largest companies grew 45%, while WIG Banks outperformed the market, gaining 56%. In the same period, share price of Bank Millennium grew 87%.

Annual change of Bank Millennium share price vs. WIG Banks index



In 2025, the average daily trading volume of Bank Millennium shares amounted to PLN20.5 million, which was 165% higher compared to the previous year.

Market ratios	30.12.2025*	29.12.2024*	Change y/y
Number of Bank's shares ('000)	1 213 117	1 213 117	0.0%
Average daily turnover in annual terms (in PLN'000)	20 454	7 708	165.4%
Bank's share price (PLN)*	16.63	8.9	86.9%
Market capitalisation of the Bank (PLNm)	20 174	10 797	86.9%
WIG Banki	19 177	12 346	55.3%
WIG20	3 184	2 192	45.3%
WIG - main index	4 087	2 806	45.7%

(*) last day of listing in 2025 and 2024

Bank Millennium's shares are included, among others, in following indices on the Warsaw Stock Exchange: WIG, WIG30, WIG Banks, mWIG 40 and WIG Poland.

3.2 Bank Millennium's ratings

On April 10, 2025, Moody's rating agency ('Moody's') upgraded the Bank's long- and short-term deposit ratings to Baa2/P-2 from Baa3/P-3 and maintained the positive outlook on the long term deposit ratings.

Additionally, Moody's upgraded the Bank's Baseline Credit Assessment (BCA) to ba2 from ba3, its Adjusted BCA to ba1 from ba2, its junior senior unsecured (also referred to as "senior non-preferred") bond and MTN programme ratings to Ba1 and (P)Ba1 respectively from Ba2/(P)Ba2, its long-term Counterparty Risk Ratings (CRR) to Baa1 from Baa2 and its long-term Counterparty Risk (CR) Assessment to Baa1(cr) from Baa2(cr). The Bank's short-term CRRs and CR Assessment were affirmed at P-2 and P-2(cr).

On May 28, 2025, Fitch Ratings ('Fitch') upgraded the Bank's Long-Term Foreign-Currency Issuer Default Rating (LT IDR) and Long-Term Local Currency IDR (LC LT IDR) to 'BBB-' from 'BB+' and changed the outlook for these ratings to 'stable'. Additionally, Fitch upgraded the Viability Rating (VR) for the Bank to 'bbb-' from 'bb+' and upgraded the rating for the senior non-preferred bonds issued by the Bank to 'BBB-' from 'bb+'. According to Fitch "The upgrade reflects a continued reduction in legal risks associated with foreign-currency mortgage loans, resulting in a stronger business profile, as evidenced by steadily improving operating profitability and a record of adequate capital buffers. We believe the bank's medium-term strategy and its execution are no longer significantly constrained by these legacy risks, which are reducing."

On November 18, 2025, Moody's rating agency ('Moody's') following an adoption of updated banks methodology upgraded the Bank's long-term deposit ratings to Baa1 from Baa2, while changing the outlook to stable from positive and maintained ratings for short-term deposits at P-2. Additionally, Moody's upgraded the Bank's Baseline Credit Assessment (BCA) to ba1 from ba2, its Adjusted BCA to baa3 from ba1, its junior senior unsecured (also referred to as "senior non-preferred") bond and MTN programme ratings to Baa3 and (P)Baa3 respectively from Ba1/(P)Ba1, its long-term Counterparty Risk Ratings (CRR) to A3 from Baa1 and its long-term Counterparty Risk (CR) Assessment to A3(cr) from Baa1(cr). The Bank's short-term CRRs and CR Assessment were affirmed at P-2 and P-2(cr).

At the date of publishing this Report, the Bank's corporate ratings, were as follows:

Rating	MOODY'S
Long-term deposit	Baa1
Short-term deposit	Prime-2
Baseline Credit Assessment (BCA)/Adj. BCA	ba1/baa3
LT Counterparty Risk Assessment (CRA)/ST CRA	A3(cr)/Prime-2(cr)
Rating outlook	Stable
SNP MREL bonds	Baa3
AT1 issue rating	Ba3 (hyb)

Rating	FITCH
Long-term deposit Issuer Default (IDR)	BBB-
National Long-term	A(pol)
Short-term Issuer Default Rating (IDR)	F3
Viability (VR)	bbb-
Shareholder Support Rating (SSR)	b+
Rating Outlook	Stable
SNP MREL bonds	BBB-

3.3 Investor relations

Communicating with the investors' community the Bank assures a high level of transparency and proper access to information for all its recipients. Accurate and up-to-date information is provided in keeping with relevant legal regulations. The list of information published by the Bank, defining the frequency and place of publication, is available on the Bank's website in the Investor Relations section – in section of Information Policy [Information policy of Bank Millennium - Bank Millennium](#).

The investor relations website [Investor relations - About the Bank - Bank Millennium](#) always provides up-to-date information, including Bank Millennium share prices on the WSE, shareholding structure, details of General Meetings, dividend payment history or credit ratings. There are also current and periodic reports, financial results presentations, Excel sheets with key financial information and other important information about the Bank. It is worth noting that the website is responsive, which means that it is adapted to mobile devices - tablets and smartphones.

The Bank makes use of diverse communication channels to reach current and potential Shareholders, primarily such channels as:

- Periodic conferences with the Management Board about quarterly results of the Bank's Capital Group (four during 2025),
- Participation in conferences organised for Investors in Poland and abroad (15),
- One-on-one and group meetings with capital market participants (608 participants),
- Current reports (33) and press releases,
- Dedicated website in the Bank's portal on investor relations,
- Encouraging participation in annual General Meetings of the Bank,
- Day-to-day contacts with market participants (via e-mail, phone or internet communicators).

In keeping with best practice on equal access to information from 2006 the Bank has been assuring unrestricted access to results conferences online with the Management Board (video streaming in Polish and in English) and by phone. A recording of each conference is available on the Bank's website. The Bank also provides video streaming of General Meetings. A recording of the deliberations and the resolutions adopted are also available on the website.

Bank Millennium is covered by 11 analysts representing local and international brokerage houses who publish their reports and recommendations for Bank Millennium shares. The full list can be found on the Bank's website [Analysts - Investor relations - Bank Millennium](#)

As at 31 December 2025, the structure of recommendations (not older than 6 months) was as follows:

Buy	Hold	Sell
2	2	7

The average target price of Bank Millennium's shares as of 31 December 2025 was PLN 15.40

3.4 Dividend policy

Bank Millennium's dividend policy assumes distribution of between 35% to 50% of its net profit, provided that recommendations of the PFSA regarding the payment of dividends are met.

Bank Millennium Bank posted a net profit in 2025. The Management Board of the Bank intends, following the necessary corporate approvals, to recommend shareholders at 2026 AGM a retention in own funds of the Bank 100% of the net profit made in 2025.

4. Market conditions and macro risk factors

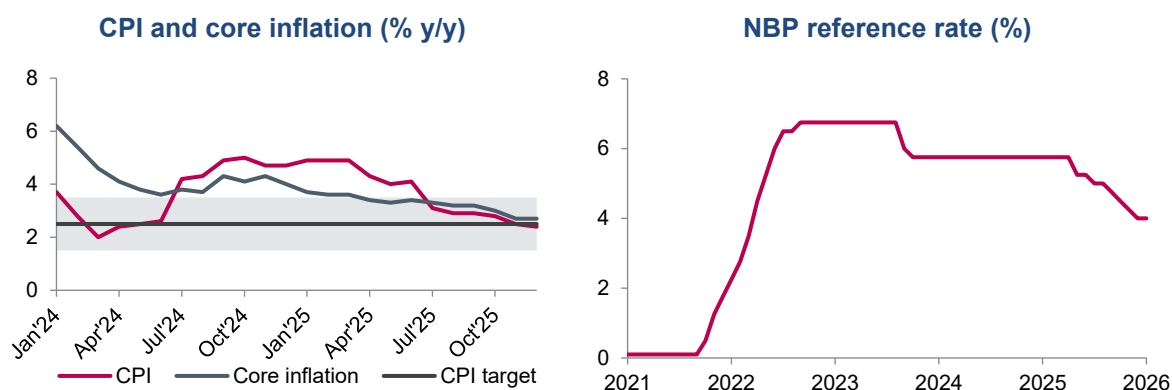
4.1 Macroeconomic environment

2025 was marked by significant changes in global trade policy and growing geopolitical tensions. In August, the biggest changes in US customs policy in decades came into force. The new import tax rates have covered about 70 countries, including the European Union and China. In addition, sectoral tariffs were introduced, among others, on steel, copper, aluminium and cars. While the final solutions turned out to be softer than originally announced, tariffs worldwide have risen to their highest level in many years, forcing adjustments in international supply chains and prompting companies to seek new markets and cheaper suppliers.

Trade policy remained an important source of uncertainty; however, fiscal and geopolitical risks were gaining importance for the global economic outlook. In the United States, the deteriorating budget situation intensified concerns about the long-term sustainability of public finances. Similar challenges were observed in Europe: in France, rising fiscal pressures contributed to increased political instability. Consequently, both countries experienced sovereign credit rating downgrades.

Despite these adverse trends, the global economy showed resilience in 2025. According to the International Monetary Fund's estimates, global growth was 3.3%, similar to 2024, supported by a softer monetary policy. In the US, GDP growth remained solid at around 2.0%, supported by high consumption by higher-income households and growing infrastructure and technology investments, including those related to artificial intelligence. In China, economic activity was strong for most of the year, propelled by industry and exports, but 4Q25 brought a slowdown resulting from weakening domestic demand and a deepening imbalance in the residential real estate sector. In the euro area, economic growth was around 1.2%, slightly below the long-term average, despite the continued weakness of the German economy.

According to the IMF forecasts, the global economy is also expected to grow by 3.3% in 2026, matching the pace recorded in 2024–2025. However, the outlook for the eurozone – Poland's key trading partner – remains relatively weaker. As a result, in the coming quarters, foreign demand is unlikely to be a significant factor supporting Polish GDP growth.



Source: Macrobond, GUS, NBP, Bank Millennium

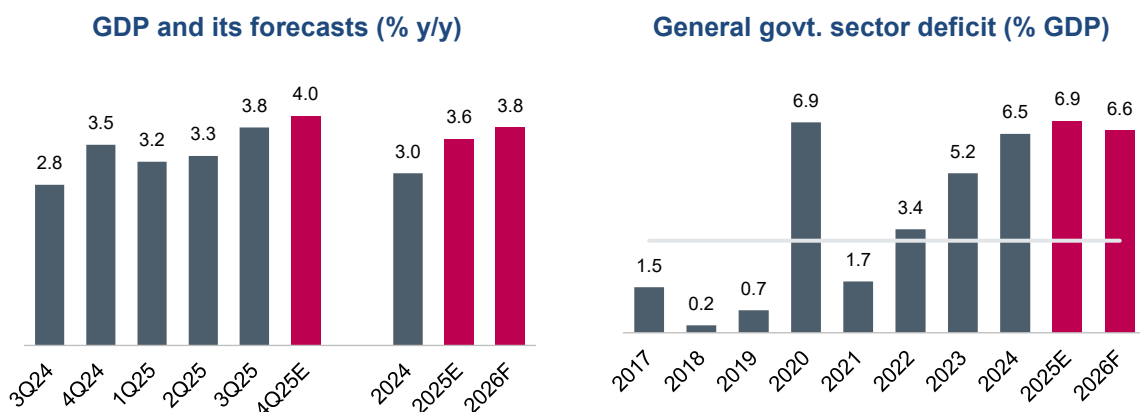
The Polish economy also remained resilient to changes in international trade conditions. After a weaker 1Q25, GDP growth gradually accelerated and, according to the Bank's estimates, reached about 4.0% y/y in 4Q, and for the whole of 2025 amounted to 3.6% compared to 3.0% in 2024. The main driver of growth was private consumption, supported by rising household incomes and improved consumer sentiment. Investments, on the other hand, remained relatively weaker, which resulted from the initial phase of implementation of projects co-financed from EU funds. Net exports probably did not support growth, although export results turned out to be better than expected, among others, thanks to the diversification of Polish production and the expansion of enterprises to non-European markets.

Household consumption was significantly supported by a gradual decline in inflation in 2025, which turned out to be deeper than expected. In December 2025, CPI inflation fell to 2.4% y/y, i.e. below the NBP inflation target, and averaged 3.6% for the whole year. The decline in inflation was supported by slower wage growth amid weaker labour demand, a strong zloty and disinflation in the global economy. In view of the better inflation outlook in Poland, the Monetary Policy Council systematically lowered the interest rates of the National Bank of Poland, bringing the reference rate down from 5.75% at the beginning of the year to 4.00% in December.

A deeper-than-expected decline in inflation contributed to lower-than-planned state budget revenues. According to the 2026 budget bill, the general government deficit amounted to 6.9% of GDP in 2025 against plans of 5.4%. As a result, Fitch and Moody's have lowered the outlook for the Polish sovereign rating from stable to negative. The budget bill for 2026 provides for a deficit of 6.5% of GDP, which means the third year in a row with a deficit of more than 6%. Fiscal policy remains accommodative and the political calendar will not be conducive to consolidation efforts. However, a downgrade of the rating itself seems unlikely in the near future.

Positive real interest rates in 2025 contributed to dynamic growth in deposits. The value of deposits in the banking sector at the end of Dec'25 was PLN 198 billion higher than a year earlier, which means an increase of 9.5% y/y. Amid falling NBP interest rates and better consumer sentiment, an increase in the value of newly granted loans to households was recorded. In the period January–November 2025, the value of new consumer loans increased by 27% y/y, and 2H25 also brought a faster increase in newly granted housing loans. By contrast, the value of new loans to non-financial corporations remained broadly unchanged compared with 2024, reflecting stable demand for bank financing.

Expectations for the Polish economy for 2026 are optimistic. According to the Bank, GDP growth in 2026 will amount to approx. 3.8% y/y, exceeding the potential growth rate. The composition of growth will probably change. Investments should have a greater contribution, especially those implemented under the European Union's cohesion policy and the National Recovery Plan. According to the Bank's forecasts, consumption growth will ease as wage dynamics weaken, partly reflecting a more modest increase in the minimum wage in 2026 compared with recent years. Nevertheless, in the conditions of still expected low unemployment, consumption will remain an important support for the economy. At the same time, the slow recovery of the eurozone economy, especially in Germany, is likely to continue to limit the growth potential of the Polish economy, as in 2025.



Source: Macrobond, GUS, MinFin, Bank Millennium, E - estimate, F - forecast

The economy and the labour market are showing more signs of equilibrium. In view of these conditions and the expected favourable trends on global commodity markets, the Bank expects consumer price inflation in 2026 to be close to the NBP inflation target, and to average 2.4% y/y during the year. According to the Bank, thanks to the decreasing risks to inflation in Poland, there will be room for monetary policy easing. Taking into account the expectations of growth above potential and

accommodative fiscal policy, the scale of interest rate cuts is likely to be small. The Bank assumes that in 2026 the reference rate will fall to 3.50% from 4.00% at the end of 2025.

The optimistic scenario for the domestic economy for 2026 is burdened, as in recent years, with increased uncertainty resulting primarily from factors from the external environment. They concern both the geopolitical situation as well as possible changes in the trade policy of the world's largest economies. In addition, the risk associated with high valuations of companies in the US and a strong concentration of investors in the technology sector are growing. In China, on the other hand, tensions remain over the debt of the real estate sector and local authorities, limiting the room for fiscal action and potentially leading, under an adverse scenario, to disruptions in the financial system.

4.2 Factors of uncertainty for the economy and Bank Millennium Group

The summary list below presents the most important negative risk factors, in the Bank's opinion, for the Bank Millennium Group, regarding the macroeconomic and international situation in 2026.

- **Global political and military situation**

The risks include social unrest, the possibility of escalating military action between Russia and Ukraine, and prolonged tensions in other regions of the world, e.g. the Middle East and Asia. A deterioration in the geopolitical situation could lead to negative supply shocks, increased uncertainty and risk aversion, disruptions in international trade, and an increase in public and private debt. This could result in a deterioration in consumer and business sentiment, leading to a slowdown in economic growth.

- **Debt problems in some main economies, as well as adjustment on global financial markets**

A risk factor for the global economic situation may be possible debt problems of the public and private sectors in some main economies, as well as an adjustment of asset prices on global financial markets. The high valuation of technology companies in the US – especially those based on artificial intelligence – and the concentration of investors increase the risk of significant market correction. China is also a significant source of risk, where slowdown in growth, imbalances in the real estate sector and high debt levels may undermine the stability of the country's financial system. The potential materialisation of these risks would have an impact on global investment sentiment and an increase in risk premium. In such conditions, portfolio capital could flow out of financial markets, increasing uncertainty, weakening the zloty, and raising domestic bond yields.

- **Political, institutional and fiscal risks in Poland**

The lack of cooperation between the government and the president, as well as potential early elections, may delay the implementation of EU-funded projects. These factors could lead to a deterioration in the fiscal position, a weakening of the currency, and an increase in the risk premium.

- **Further tightening of trade policy**

Long-term protectionism may lead to disruptions in global supply chains, reduced economic efficiency and slowed growth, which would also translate into a deterioration in macroeconomic conditions in Poland.

A more optimistic scenario than the one adopted by the Bank as its baseline is also possible. It could materialize in the event of faster implementation of EU projects, an end to the war in Ukraine, an increase in consumer propensity to spend, increased investment activity by companies and a stronger economic recovery abroad -- in particular in Germany.

5. Other important considerations

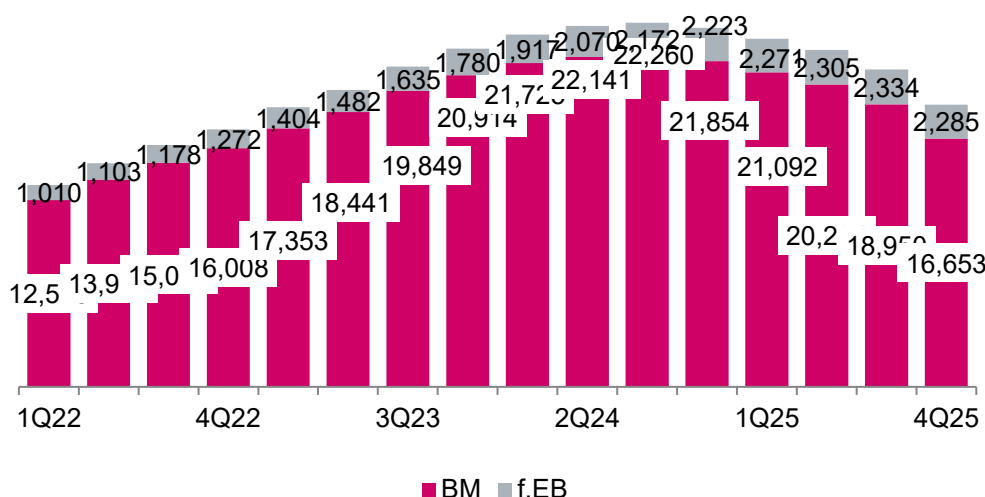
5.1 Legal risk related to the portfolio of foreign currency mortgage loans

Claims against the Bank/Group

2025 was a second year in a row when the number of active FX-mortgage related claims against the Bank dropped visibly. The drop was a result of decelerating inflow of new cases, higher number of final verdicts and last but not least an impact of amicable settlements of cases who were already during dispute in court.

On December 31, 2025, the Bank had 16,653 loan agreements and additionally 2,285 loan agreements from former Euro Bank under individual ongoing litigations (excluding claims submitted by the Bank against clients i.e. debt collection cases) concerning indexation clauses of FX mortgage loans submitted to the courts (43% loans agreements before the courts of first instance and 57% loans agreements before the courts of second instance) with the total value of claims filed by the plaintiffs amounting to PLN 3,551.2 million and CHF 293.2 million (Bank Millennium portfolio: PLN 3,057.8 million and CHF 281.4 million and former Euro Bank portfolio: PLN 493.4 million and CHF 11.8 million).

Outstanding individual lawsuits against BM Group (FX-mortgages)



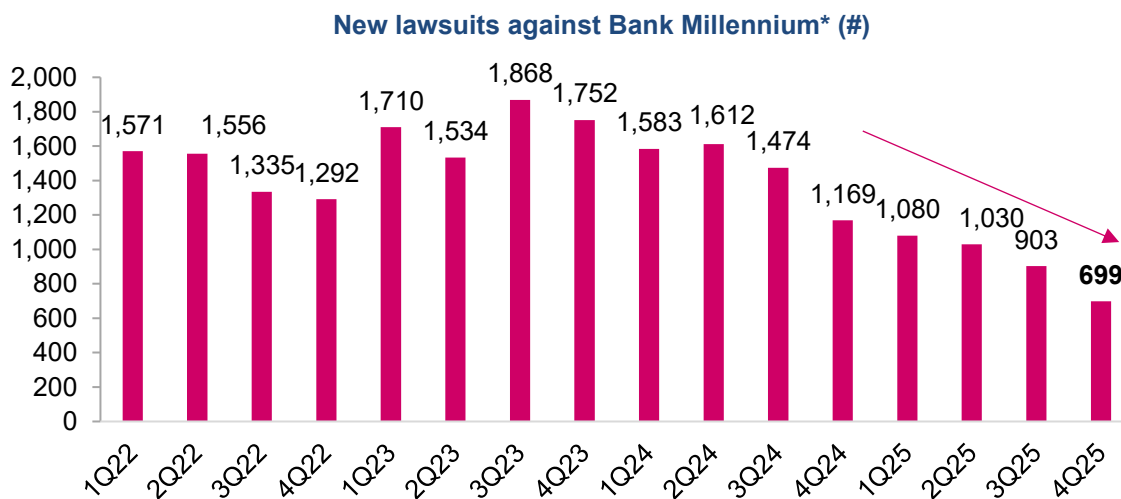
The original value of the portfolio of CHF agreements granted (the sum of tranches paid to customers), taking into account the exchange rate as at the date of disbursement of loan tranches, amounted to PLN 19.4 billion for 109.0 thousand loan agreements (Bank Millennium portfolio: PLN 18.3 billion for 103.8 thousand loan agreements and former Euro Bank portfolio: PLN 1.1 billion for 5.2 thousand loan agreements). Out of 16,653 BM loan agreements in ongoing individual cases 426 are also part of class action. From the total number of individual litigations against the Bank approximately 4,380 or 26% were submitted by borrowers that did not have any active loans with a CHF balance at the moment of submission. Approximately another 1,170 cases correspond to loans that were fully repaid during the proceedings (as court proceedings are lengthy).

The claims formulated by the clients in individual proceedings primarily concern the declaration of invalidity of the contract and payment for reimbursement of paid principal and interest instalments as undue performance, due to the abusive nature of indexation clauses, or maintenance of the agreement in PLN with interest rate indexed to CHF Libor (currently CHF Saron).

In addition, the Bank is a party to the group proceedings (class action) subject matter of which is to determine the Bank's liability towards the group members based on unjust enrichment (undue benefit) ground in connection with the foreign currency mortgage loans concluded. It is not a payment dispute. The judgment in these proceedings will not directly grant any amounts to the group members. The

number of credit agreements currently covered by these proceedings is 1,389. Out of 1,389 loan agreements in class action 426 are also part of ongoing individual cases, 27 concluded settlements and 15 received final verdicts (invalidation of loan agreement). On 24 May 2022 the court issued a judgment on the merits, dismissing the claim in full. On 13 December 2022 the claimant filed an appeal against the judgment of 24 May 2022. On 25 June 2024 an appeal hearing was held, at which the Bank filed a motion to amend the composition of the group and exclude those group members who had entered into an amicable settlement. The court required the plaintiffs' attorneys to take a written position on the current composition of the group. On January 31, 2025, and then on: March 25, 2025, May 8, 2025, June 6, 2025, July 30, 2025, September 1, 2025, October 6, 2025, November 24, 2025, December 15, 2025 and January 13, 2026, the court issued orders setting aside the judgment and discontinuing the proceedings from the persons who entered into amicable settlements. On January 19, 2026, another appellate hearing took place, during which the Court obliged both the claimant and the Bank to further specify the composition of the group. The next hearing date will be scheduled ex officio. Based on these orders, the number of credit agreements covered by the class action dropped from 3,273 to 1,389.

Since 3Q23 (quarterly peak with nearly 1,900 claims filed) the number of newly filed claims has been in a steady decline, similarly to trends observed on the market overall and among some peer banks. In 2025 the number of new claims dropped to 3,712 cases, compared to 5,838 in 2024 and 6,864 in the peak year 2023. This translated into a quarterly average of 928 new cases in 2025, 1,460 in 2024 and 1,700+ in 2023.



(*) without claims related to FX-mortgages originated by former Euro Bank

Note: Number of claims may differ from the previously presented due to reclassifications.

As far as Bank Millennium (incl. former Euro Bank portfolio) is concerned, from 2015 until the end of 2025, 17,730 cases were finally resolved (17,593 in claims submitted by clients against the Bank and 137 in claims submitted by the Bank against clients i.e. debt collection cases) out of which 5,488 were settlements, 136 were remissions, 89 rulings were favourable for the Bank and 12,017 were unfavourable including both invalidation of loan agreements as well as conversions into PLN+LIBOR (currently Saron). The Bank undertakes proper legal actions in order to secure repayment of initially disbursed capital of the loan.

Settlements with borrowers

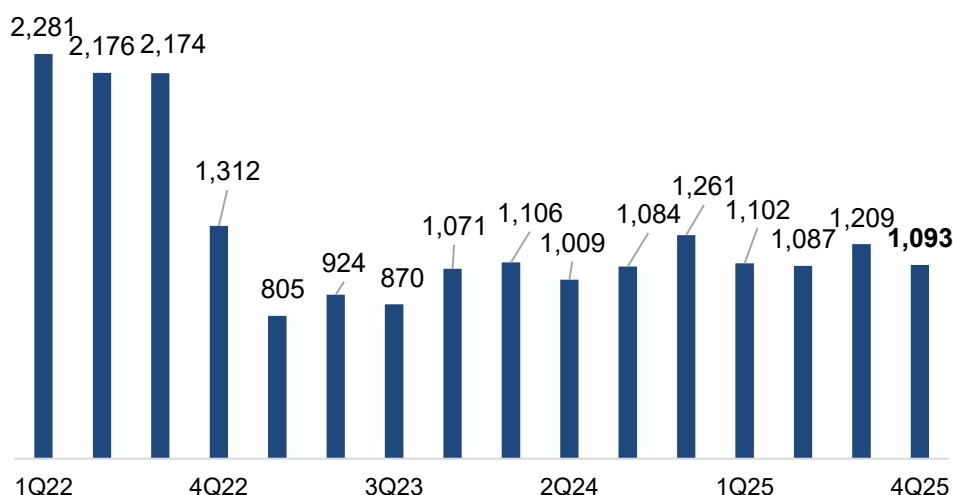
The Bank is highly focused on reduction of its FX-mortgage portfolio and the related risk and therefore continues to actively offer its customers amicable solutions (i.a. conversions to Polish zloty, pre-payments, early repayments or collectively 'settlements') regarding FX-mortgages on negotiated terms. The number of settlements reached in 2025 totalled nearly 4, 500 and was similar to this in 2024. 2025 was the first year when full year number of settlement exceed the number of new claims filed against

the Bank. Within settlements, the number and share of in-court settlements continued to increase. In 2025, nearly 2,800 such settlements were achieved (62% of all settlements in the period), compared to nearly 1,600 in 2024 (35%).

Over 30,000 settlements were reached since early 2020 when a more intensive effort started. Settlements reached to date represent nearly 50% of the number of active FX-mortgage agreements at the start of the effort.

As a result of these negotiations, final court verdicts and other natural drivers, in 2025 the number of active FX-mortgage loans decreased by over 9,800 to 14,741, following the drop by nearly 7,900 in 2024 overall.

Settlements (in- and out-of-court) (#)



Note: values may differ from these previously presented

Other considerations

Over the past years, the Court of Justice of the European Union (CJEU) has interpreted a number of legal issues concerning disputes in the area of foreign currency housing loan agreements. As a result of these actions, the legal assessments of national courts regarding claims submitted by borrowers have been significantly unified. The established line of case law is generally favourable to consumers, and the legal arguments put forward by banks, including those referring to principles of fairness, are taken into account only to a limited extent.

It can reasonably be assumed that the legal issues relating to foreign currency mortgage loans will be further examined by the domestic courts and the European Court of Justice which could potentially result in the further interpretations, that are relevant for the assessing of the risks associated with proceedings.

The issues related to the statute of limitations for the Bank's and the customer's restitution Ary claims following the invalidation of a loan agreement remain an area that may be subject to further analysis in the jurisprudence of Polish courts. Legal interpretations in this subject may have an impact for the amount of provisions in the future.

There is a need for constant analysis of these matters. The Bank will have to regularly review and may need to continue to create additional provisions for FX mortgage legal risk, taking into consideration not only the above mentioned developments, but also the negative verdicts in the courts regarding FX mortgage loans and important parameters, such as the number of new customer claims, including those relating to repaid loan agreements.

On October 2, 2025 The Council of Ministers adopted a draft act on special solutions for the examination of cases concerning loan agreements denominated or indexed to the Swiss franc and referred it to the

Parliament. The first reading of the draft act took place on October 16, 2025. The draft was referred for further parliamentary work.

The bill aims to create new regulations enabling courts to consider Swiss franc cases faster and more effectively. Its primary task is to relieve the judiciary, by accelerating the examination of Swiss franc cases.

At present, the Bank is unable to estimate the impact of the ongoing legislative work on the Bank's Financial Statements, but it does not alter the Bank's strategic approach, which remains focused on the amicable resolution of disputes with clients through the conclusion of settlement agreements.

5.2 Legal risk related to the portfolio of mortgage loans in PLN

By December 31, 2025, the Bank recorded the receipt of 241 lawsuits by borrowers of mortgage loans in PLN for reimbursement of benefits provided under the loan agreement. Seven final and favourable rulings for the Bank were issued. The borrowers' allegations focus on the WIBOR ratio as an incomprehensible, unverifiable element affecting the consumer's liability, as well as the issue of insufficient information on the effects of variable interest rates provided to the consumer by the bank before the conclusion of the contract.

On 12 February 2026, the Court of Justice of the European Union issued a judgment in case C 471/24, which may have significance for the manner in which national courts examine disputes in the relevant scope. It appears that this ruling will be invoked by banks in order to strengthen their argumentation against the allegations formulated against the durability of contractual obligations. More details on the judgement can be found in the Consolidated Annual Financial Report of the Bank Millennium S.A. Capital Group for the 12-month period ended 31 December 2025 in the chapter "Lawsuits and significant proceedings".

On June 29, 2023, The Polish Financial Supervision Authority (KNF) announced that it had assessed the ability of the WIBOR interest rate reference index to measure the market and economic realities. The KNF stated that the WIBOR interest rate reference index is capable of measuring the market and economic realities for which it was established. According to the Commission's assessment, the WIBOR ratio responds appropriately to changes in liquidity conditions, changes in central bank rates and economic realities.

On July 26, 2023, the Polish Financial Supervision Authority (PFSA) presented its position on legal and economic issues related to mortgage loan agreements in Polish currency in which the WIBOR interest rate reference index is used. This position can be used in court proceedings and can then be treated as an "amicus curiae" opinion. The Polish Financial Supervision Authority stated that the WIBOR reference index meets all legal requirements. In the opinion of the Polish Financial Supervision Authority, there are no grounds to question the credibility and legality of WIBOR, in particular in the context of the use of this indicator in mortgage loan agreements in the Polish currency.

Based on publicly available information, it can be assumed that there will be a continuation of inflow of lawsuits concerning mortgage loans in PLN. This phenomenon affects the entire sector of banking services. It is possible that a "business model" will be created in the area of law firms, which consists in questioning mortgage contracts containing a variable interest rate clause based on the WIBOR reference index.

For cases in which, in the Bank's assessment, the probability of losing the dispute is higher than that of winning it, provisions are created in an amount resulting from the expected cash outflows.

5.3 Legal risk related to the portfolio of consumer loans

Under Polish consumer protection laws, a bank granting a loan to a consumer must include certain information in the relevant loan agreement. The information to be provided to the borrower includes the principal parameters of the loan, interest and fees associated with the loan or the terms on which the

loan may be prepaid. If the Bank did not include the required information in the loan agreement, the borrower may repay the loan without any interest or fees, so called "free loan" sanction. Certain borrowers under consumer loans granted by the Bank claim that, when granting a loan, the Bank did not perform its information undertakings towards the borrower arising under Polish consumer protection laws. Certain borrowers under consumer loans or professional entities which acquired claims under the loans from the original borrowers attempt to challenge the loans in courts by claiming that the loans did not meet the criteria prescribed by Polish consumer protection laws. Polish courts referred some of legal issues raised by the borrowers to the CJEU. The CJEU judgments in these matters may have a significant impact on the manner in which Polish courts adjudicate the cases relating to the "free loan" sanction.

By December 31, 2025, the Bank received 2,355 lawsuits in which the plaintiffs (both clients and companies purchasing claims), alleging violation of the information obligations and demanding reimbursement of interest and other costs incurred in connection with taking out a loan.

As of December 31, 2025, 373 cases have been legally concluded, in 332 cases the Bank won the dispute and lost in 41 cases. Disputes in the above respect are subject to constant observation and analysis. In the cases in question, the Bank makes an individual assessment of the litigation chances in each of the court cases, which is justified by the lack of a uniform line of jurisprudence. For cases in which, in the Bank's assessment, the probability of losing the dispute is higher than that of winning it, provisions are created in an amount resulting from the expected cash outflow.

Based on publicly available information, it can be assumed that there will be a continuation of inflow of court cases concerning the free loan sanction. This phenomenon affects the entire banking services sector. It is likely that a "new business model" will be created in the area of law firms, which involves questioning consumer credit agreements.

Additional information regarding the above risk factors and a description of additional risks can be found later in this report and in the Consolidated Annual Financial Report of the Bank Millennium S.A. Capital Group for the 12-month period ended 31 December 2025.

6. Polish banking sector and Bank Millennium/Bank Millennium Group's position

6.1 Polish banking sector in 2025

Following a very strong 2024, the year 2025 confirmed the structural improvement in profitability and balance-sheet strength of the Polish banking sector. A supportive macro backdrop, resilient household demand, improving corporate investment activity, contained credit risk and sustained liquidity overhang translated into another year of strong financial performance for the sector as a whole.

According to KNF's data, the banking sector generated a net profit of PLN 49.0 billion in 2025, up 21.7% y/y versus 2024. The rolling 12-month ROE reached c. 16.3% at end-2025, while ROA improved to around 1.39%, confirming further strengthening of profitability and capital efficiency.

Income growth and profitability drivers

Net interest income remained the key earnings driver also in 2025. While the growth momentum moderated versus the exceptional dynamics seen in 2023–2024, NII continued to expand, supported by the still elevated interest rates in most of the year, growing loan volumes, particularly in the household segment, and continued optimisation of funding costs amid excess liquidity.

Net interest margin peaked in 1H25 and gradually eased towards year-end, but remained structurally higher than in pre-2022 years (around 3.6%-3.7% at end-2025). Fee and commission income continued to grow, supported by higher transaction activity and sustained interest in investment and savings products. As a result, total income remained on a solid upward trajectory, allowing banks to further absorb cost pressure while maintaining strong profitability.

Costs and operating efficiency

Operating costs continued to grow, driven mainly by wage pressure and still elevated energy costs. However, cost growth remained clearly below revenue growth, sustaining positive operating jaws. As a result, operating efficiency improved further, with the sector cost-to-income ratio stabilising in the low-40s range by end-2025, confirming the structural improvement achieved since 2023.

Digitalisation trends continued: branch numbers and front-office employment declined further, while head-office employment increased moderately, reflecting ongoing centralisation, IT investment and regulatory workloads.

Credit risk and asset quality

Credit risk remained contained in 2025. The share of Stage 3 exposures for the non-financial sector declined further to around 4.6% at end-2025 (from 5.0% a year earlier), with coverage ratios broadly stable to slightly lower.

Household portfolios continued to improve in quality, with Stage 3 shares in mortgages declining towards ~1.3%, while consumer loan risk metrics also improved gradually. The corporate book showed more mixed dynamics with SME portfolios remaining broadly stable in quality, large corporates recording a slightly higher Stage 3 share (above 7%), though still manageable at sector level. Overall, impairment charges remained moderate relative to operating profit, confirming the benign credit cycle in 2025.

Loans, deposits and balances sheet growth

The banking sector balance sheet expanded by c. 9.7% y/y in 2025, driven primarily by deposit inflows and valuation growth of financial assets. Total assets reached PLN 3.66tn at end-2025.

Loan growth accelerated further with total loans to the non-financial sector up by 6.3% y/y. Household loans were up 5.6% y/y, supported by mortgages and consumer lending. Finally, corporate loans grew by 7.5% y/y, reflecting stronger investment activity linked to energy transition and large infrastructure projects.

Deposit inflows remained very strong. Deposits of the non-financial sector increased by ~8.6% y/y, driven mainly by households, while corporate deposits also rebounded in 2025. Excess liquidity in the sector deepened further, with the loan-to-deposit ratio falling to ~58% at end-2025, a new historical low.

The structural shift in deposit mix continued: the share of term deposits increased further, although current accounts remained dominant, reflecting high liquidity buffers of households and corporates.

Capital position and liquidity

The Polish banking sector maintained a very strong capital position in 2025. Own funds increased further, supported by strong profitability. Liquidity remained abundant across the sector.

The average LCR stood far above regulatory minima (around 239% for commercial banks), while NSFR remained comfortably above 100%, confirming a structurally over-liquid system.

Sector structure and concentration

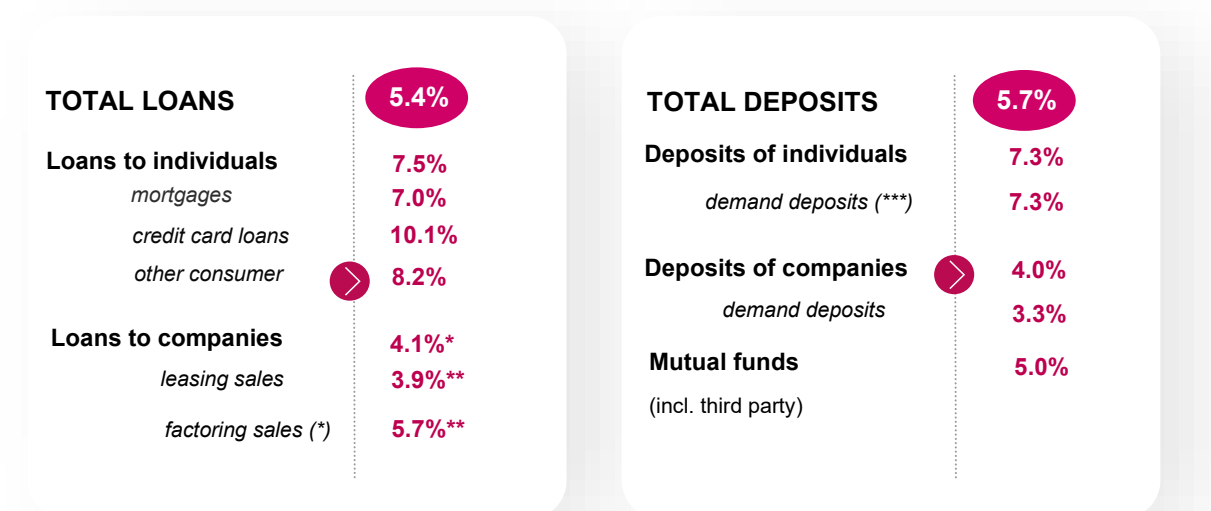
During 2025 banking sector saw further reduction of its distribution network with end-2025 number of branches/POS/rep offices dropping to 9.5k from 9.7k at end-2024. In contrast, total employment remained in a slow uptrend with end-2025 headcount of over 149k compared with below 147k staff at end-2024.

Gradual sector concentration continued in 2025. The share of the five largest banks in total sector assets increased to c. 59–60%, while the Herfindahl-Hirschman Index rose to ~922, still indicating a competitive market structure. At end-2025, the sector comprised of 30 commercial banks, 488 cooperative banks, and 35 branches of foreign credit institutions, with commercial banks accounting for almost 90% of total sector assets. Foreign controlled banks accounted for 43% of total sectors' assets, while State controlled banks for 48%.

6.2 The Bank's and Bank Millennium Group's position on the market

At end of 2025, Bank Millennium ranked 7th among top commercial banks in Poland by total assets and deposits. The Bank's market share in total deposits was 5.7% and 5.4% in total loans. Bank Millennium Group had a relatively stronger position in the household segment with market share in total loans at 7.5% and market share in total retail deposits at 7.3%. The Group enjoyed particularly strong position in PLN mortgage loans segment (7.5%), non-mortgage retail loans (8.5%) or transactions made with cards (8.1% in September '25). In the companies' segment, the Group has a lower share than in the retail segment with 4.0% in deposits and 4.1% in loans at YE25. The Group maintains a traditionally above-average position in factoring products with market share of 5.7% in September'25. The Group continues to distribute its products and services via a network of 590 outlets (own branches and franchise ones), as well as through electronic channels, including cash machines, the Internet, phone and mobile apps.

Bank Millennium's market shares



(*) Market volume used in denominator includes: Micro Business, Corporate and Budget and Insurances; (**) data for September 2025; (***) Including savings accounts

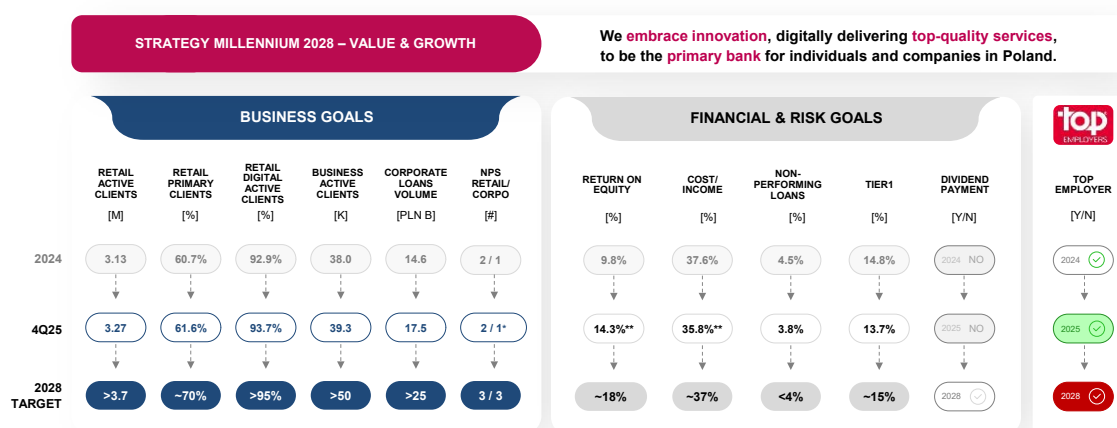
Source: National Bank of Poland, Bank Millennium;

7. Strategy and business development prospects

7.1 Strategy implementation in 2025

The year 2025 was the first year of implementation of the Bank Millennium strategic plan “**Strategy 2028 - Value & Growth**”, which sets out the key development directions for a four-year perspective. The main assumptions of the applicable plan include uninterrupted development in the retail area, strengthening the Bank’s position in the segment of medium and large enterprises, and improving profitability. The Bank focuses on digitalisation, development of its offering, including investment and savings products, as well as consistent enhancement of customer service an area in which it aims to maintain a leading positions.

Main strategic KPIs of 2025-2028 strategy and implementation



(*) NPS for retail banking segment reported on quarterly basis and for corporate banking segment on annual basis; (**) Financial indicators reported cumulative after each quarter, i.e. year-to-date, versus 2024 full year result.

In the retail banking segment, in 2025 the Bank carried out activities appropriate for the initial stage of strategy implementation, strengthening the offering, digital channels, and process efficiency. BLIK recurring payments were introduced, as well as new functionalities in the mobile application enabling, among others, ordering cash to a branch, identity confirmation in public services, and purchasing eSIM cards. At the same time, in 2025 the number of active digital users exceeded 3 million, which constitutes a significant step in achieving the strategic objective related to customers’ digital activity. The Bank expanded its digital payments offering by providing customers with new methods and devices. “Twój Cel” Saving Account, promoting regular saving, was also introduced, and the development of the mortgage offering was continued, including through the EKO promotion for mortgage loans, thanks to which customers purchasing a low-energy-demand property benefit from reduced interest rates. The offering for affluent customers was also expanded by introducing the Millennium 360° Prestige Account package. Effective and consistently implemented commercial activities contributed to a significant increase in deposit levels and dynamic development of the investment portfolio, thus supporting long-term business objectives. Millennium TFI assets in investment funds in the reported period exceeded 11 billion PLN, which constitutes an 45% year-on-year increase. Deposits of retail banking customers increased to over 98 billion PLN, i.e. by 12% compared with the result for 2024.

The Bank also carried out its first marketing campaign addressed to young customers, implemented in cooperation with micro-influencers, and in the fourth quarter began implementing an advanced marketing personalisation system by launching a pilot for the first group of customers.

In the corporate banking segment, Bank Millennium consistently strengthened its position thanks to intensified commercial activities, expansion of its offering, and implementation of technological solutions. In 2025 it was the first bank on the market to make the Millenet Link Lite service available, enabling automatic file exchange via the cloud. A pilot of a simple loan for companies was launched, the Pożyczka na rozwój was introduced, and together with KUKE green guarantees were implemented. Business clients can also use the functionality of making payments directly from foreign currency accounts without conversion, as well as sign leasing agreements fully remotely. In the area of supporting the energy transition of enterprises, the Bank offered a carbon footprint calculator compliant with the GHG Protocol, enabling the preparation of environmental reports along with recommendations for emission reductions. Millennium also established cooperation with Pracodawcy RP under the Energia Pracodawców RP programme, enabling entrepreneurs to obtain funding for up to 90% of documentation costs for investments improving energy efficiency. Recruitment under the Kredyt ekologiczny BGK was also continued. The year 2025 was also the beginning of building a new segment of small enterprises, i.e. commercial law companies with annual revenues of up to 20 million PLN. As a result, the value of the corporate banking loan portfolio increased from 14.7 to 17.5 billion PLN, which translates into 19% year-on-year growth.

The year 2025 also confirmed the strong market position of the institution — for the third time in a row the Bank took first place in the traditional banking category and for the fourth time maintained its leading position in remote banking in the “Przyjazny Bank Newsweeka” ranking. It also received the title “Najlepszy Bank dla Zamożnych” and took second place in the “Bank Przyjazny Firmie” ranking.

Bank Millennium consistently conducted activities in the area of social, employee, and cultural engagement. In 2025, the Bank confirmed its position in the field of organisational culture by once again obtaining the Top Employer certification. The year 2025 was a period of continued cultural patronage, including support for and promotion of the 22nd edition of the Millennium Docs Against Gravity festival under the theme “Między nami cały świat” — the largest documentary film festival in Poland, held in seven cities and presenting over 150 films. The Bank Millennium Foundation also launched the 15th edition of the “Finansowy Elementarz” programme, supplemented with educational materials for children with disabilities. Employee volunteering remained an important area of activity — in the reporting period, another edition of the “Our People’25” programme was completed, under which 54 social projects were implemented, and nearly 1,800 employees participated in a sports charity initiative. In the last quarter, the Bank also published the latest edition of the “Ekoindeks Millennium” report, analysing eco-innovation across Polish regions.

7.2 Business outlook for 2026

As stated earlier in this report, 2026 is expected to deliver not only stronger GDP growth (3.8% forecast by the Bank’s economists, compared with 3.6% in 2025) but also a shift in its underlying drivers. Investments are projected to play a more prominent role, particularly those financed under the European Union cohesion policy and the National Recovery Plan. According to the Bank’s forecasts, consumption growth will moderate as wage dynamics ease, partly reflecting a more modest increase in the minimum wage in 2026 compared with recent years. Nevertheless, given the continued expectation of low unemployment, household consumption will remain an important pillar of economic activity. At the same time, the slow recovery of the eurozone economy, especially in Germany, is likely to continue constraining Poland’s growth potential, much as it did in 2025. Lower interest rates and inflation should support demand for retail and corporate lending.

These expected macroeconomic trends remain broadly aligned with, and supportive of, the Bank’s Strategy. The strategic emphasis will continue to be placed on expanding core business activities. In the retail segment, origination of consumer and mortgage loans is expected to grow at a moderate pace. In contrast, the corporate segment is expected to accelerate loan growth. Net interest income will face pressure from declining market interest rates. A further 50-basis-point reduction in the reference rate is anticipated, reaching a medium-term stable level of 3.5%, although with a downside risk present. Despite a continued downward trend in NIM, net interest income is expected to remain relatively resilient. Growth of operating expenses, shaped by a period of elevated inflation and substantial wage

increases, is expected to decelerated to a high single-digit rate in 2026. New hires, adjustments in staff structure, and ongoing wage alignments will increase HR-related costs. Rising non-HR expenses will reflect higher spending on IT, new projects, and strategic initiatives. As a consequence, the cost-to-income ratio is expected to rise somewhat. The cost of risk, which was very low in the last two years, is projected to gradually normalise to the range of 50 - 70 basis points of total gross loans, reflecting a higher share of small and mid-corporate lending as well as an evolving product mix within the retail portfolio. Costs related to FX-mortgage litigation are expected to decline further, following the downward trend in new court filings. Finally, it should be noted that 2026 will be the first year in which the increased CIT rate from 19% to 30%, comes into effect.

Notwithstanding this favourable business outlook, risks - particularly those of a legal and regulatory nature - will continue to pose potential challenges. The Bank remains mindful of risks associated with rulings issued by domestic courts and by the Court of Justice of the European Union in matters concerning consumer loans. A forthcoming legislative proposal related to the reform of procedures applicable to FX-mortgage claims may require adjustments to the Bank's legal-risk mitigation strategy and to provisioning assumptions, depending on its final form. Furthermore, other potential adverse developments related to legal risks in the FX-mortgage portfolio, or even within the PLN mortgage portfolio, cannot be ruled out

8. Financial situation

8.1 Profit and loss account

Net profit (consolidated) <i>(PLNmn)</i>	2025	2024	y/y
Operating income	6 936	6 521	6%
Operating costs	(2 556)	(2 253)	13%
Impairment provisions and other cost of risk*	(250)	(310)	-19%
FX legal risk related cost	(2 104)	(2 850)	-26%
Banking tax	(406)	(232)	75%
Pre-tax profit	1 620	875	85%
Income tax	(418)	(156)	168%
Net profit – reported	1 202	719	67%
Net profit – adjusted**	3 222	3 202	1%

(*) Impairment provisions for financial and non-financial assets including also fair value adjustment of credit portfolio (PLN0.6mn in 2025 and PLN0.7mn in 2024) and loans modification effect (PLN-3.2mn in 2025 and PLN-2.2mn in 2024)

(**) Without extraordinary items, i.e. negative impact of credit holidays (PLN113mn in 2024) and FX mortgage loan related costs/incomes (in legal risk provisions, FX position, operating cost and other operating income/cost including indemnity from Societe Generale as well as tax effects) and hypothetical banking tax until the end of May 2024

Operating income of the Group <i>(PLNmn)</i>	2025	2024	y/y
Net interest income	5 756	5 530	4%
Impact of credit holidays on net interest income	0	(113)	-
Net interest income adjusted	5 756	5 643	2%
Net commission income	775	777	0%
Core income	6 531	6 307	4%
Core income without credit holidays	6 531	6 419	2%
Other non-interest income*	406	214	90%
Total operating income	6 936	6 521	6%
Total operating income adjusted**	5 129	5 098	1%

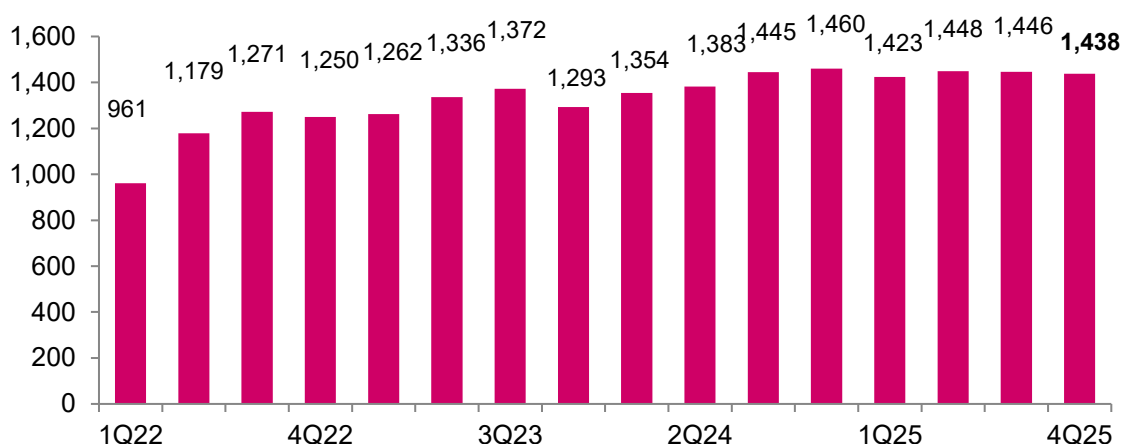
(*) Without fair value adjustment of credit portfolio (PLN0.7mn in 2024 and PLN0.6mn in 2025), which is included in the cost of risk line

(**) Without extraordinary items, i.e. negative impact of credit holidays (PLN113mn in 2024) and FX mortgage loan related costs/incomes (in FX position and other operating income/cost including indemnity from Societe Generale)

Net interest income (NII) in 2025 totalled PLN5,756 million and was up 4% y/y on reported basis and up 2% y/y without 2024 credit holiday effect.

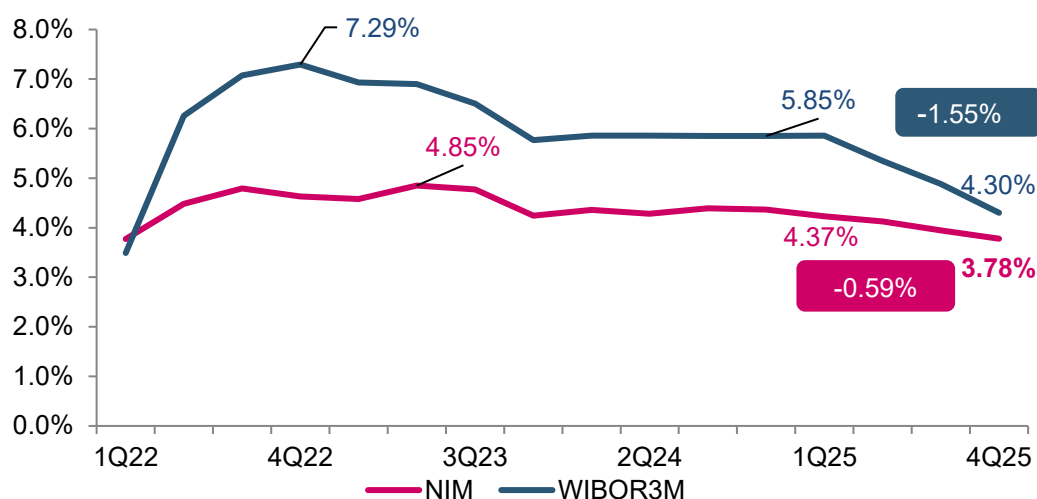
Average 3M WIBOR in 2025 was 5.09% vs. 5.86% in 2024 following six base interest rates cut by 175 bps altogether in 2025, preceded by rate cuts totalling 1 p.p. in the second half of 2024. Interest income was up 3% y/y on reported basis (or up 2% while adjusted for credit holidays) with interest income from bonds behind the growth. Interest cost was up 2% y/y with deposit costs slightly lower y/y but higher other funding costs with EUR500 million issue in September'24 and cost of asset securitisations being major reasons.

NII excluding cost of credit holidays (PLNmnn)



Net interest margin (over average interest earning assets) (**NIM**) averaged 4.01% in 2025 and was 35bps lower compared to 2024 level, while the respective drop of average 3M WIBOR was 77 bps. The above mentioned factors (interest rate cuts and cost of MREL bonds and asset securitisation transactions) as well as growing share of bonds in assets had an adverse impact on NIM whereas decreasing cost of deposits (down 25 bps during 12 months to 1.95% in 4Q25) and some improvement in bonds yields had both a positive impact partly offsetting the earlier mentioned factors.

Quarterly net interest margin (NIM)



Net fees in 2025 totalled PLN775 million and stayed flat compared to the previous year mostly limited by lower bancassurance fees (down 41% y/y following the sale of majority stake in the bancassurance agency business to an external partner in 2023). Without bancassurance fees, total net fees would grow by 7% y/y with the strongest 31% y/y generated by fees from brokerage and investment products and 19% growth in card fees.

Reported core income, defined as a combination of net interest and net commission income, in 2025 reported core income reached PLN6,531 million and grew 4% y/y. Adjusted for the impact of credit holidays in 2024 the y/y growth rate would be 2%.

Other non-interest income, which comprises FX result, results on financial assets and liabilities (without fair value adjustment on credit portfolio) and net other operating income and costs, amounted to PLN406 million in 2025 and strongly grew 90% y/y largely owing to revaluation of a participation in a company and to positive effect from the sale of a real estate. Some costs related to court cases against FX mortgage loans borrowers (PLN150 million in 2025, down from PLN407 million in 2024) were booked in other operating costs and continued to negatively impact this line, although to a much lesser extent.

Total operating income of the Group reached PLN6,936 million in 2025 on a reported basis, and was up 6% y/y.

Total operating costs amounted to PLN2,556 million in 2025, translating into a 13% increase y/y, while the growth rate without BFG costs would be 10%.

Operating costs <i>(PLNmn)</i>	2025	2024	y/y
Personnel costs	(1 356)	(1 197)	13%
Other administrative costs	(1 200)	(1 056)	14%
<i>of which Banking Guarantee Fund (BFG) fees</i>	<i>(150)</i>	<i>(61)</i>	<i>146%</i>
Total operating costs	(2 556)	(2 253)	13%
<i>Total costs without BFG</i>	<i>(2 407)</i>	<i>(2 192)</i>	<i>10%</i>
Cost/income – reported	36.9%	34.5%	2.3 p.p.
<i>Cost/income – adjusted *</i>	<i>35.8%</i>	<i>30.8%</i>	<i>5.1 p.p.</i>

() without extraordinary income or cost*

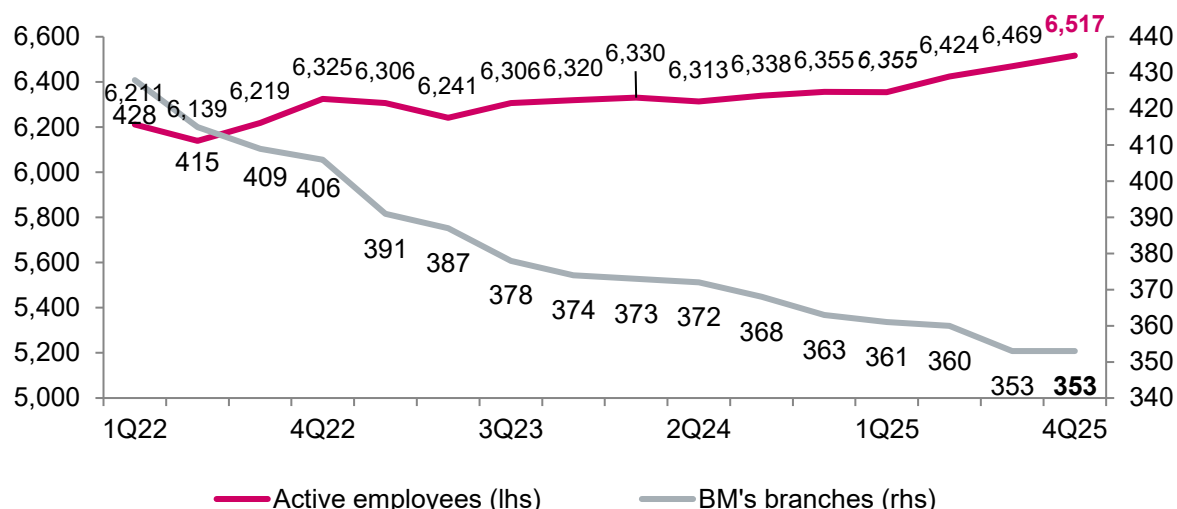
Personnel costs amounted to PLN1,356 million in 2025 and increased 13% y/y, mainly as a result of wage inflation translating into higher base salaries and also higher provisions for bonuses, holiday leaves etc.

The Group continued to adjust the number of its branches and personnel to its needs, reflecting ongoing digitalisation of banking business and the growing importance of online channels while simultaneously keeping strong geographical presence through brick-and-mortar outlets. At the end of December 2025, the total number of own branches stood at 353 units with the y/y reduction at 10 units. Total Group's FTE's at the end of December 2025 amounted to 6,906, up 3% y/y. Without employees absent due to long leaves ('active FTEs'), the headcount was lower at 6,517 staff and grew 3% y/y.

Employment (FTEs)	31.12.2025	31.12.2024	y/y
Bank Millennium S.A.	6 621	6 450	3%
Subsidiaries	285	264	8%
Total Bank Millennium Group	6 906	6 714	3%
Total BM Group (active* FTEs)	6 517	6 355	3%

(*) active FTEs denote employees not on long-term leaves

Staff and own branches (#)



Other administrative costs (including depreciation) reached PLN1,200 million in 2025 and were 14% higher y/y. More than doubling costs of contributions to the Banking Guarantee Fund (BFG) (+ PLN89 million y/y) were the main reason behind this high growth rate. The growth was largely driven by a reinstatement of a fee for the Deposit Guarantee Fund (PLN73 million) after its suspension by BFG since second half of 2022. Additionally the other charge – Resolution Fund fee – also increased substantially, i.e. by 25% y/y. The y/y growth of other administrative costs without BFG would be 6%. Among the key groups of costs, the higher annual increase was witnessed in IT and telecommunication costs (up 35% y/y). Legal and advisory costs were still material items within other administrative costs. Legal costs relating to FX-mortgage portfolio remained significant (PLN95 million) but decreased visibly, i.e. 31% y/y.

Cost-to-income ratio (C/I) for 2025 stood at 36.9% (reported) compared to 34.5% in 2024 and was higher by 2.3 p.p. y/y while the adjusted ratio 35.8% vs. 30.8% respectively. The increase of the cost/income ratio reflected still high operating cost dynamics.

Total cost of risk, which comprised net impairment provisions, fair value adjustment related to specified loan portfolios and result on modifications, bore by the Group amounted to PLN250 million in 2025 vs. PLN310 million in 2024 (down 19% y/y), with improving risk profile and higher gains from NPL sales (PLN166 million vs. PLN119 million). Retail segment charges totalled PLN100 million vs. PLN203 million in 2024, while corporate/other PLN150 million vs. PLN107 million respectively, which marked a considerable improvement. In basis points, 2025 total risk charge stood at 30bps vs. 2024 cost of 40bps, with retail segment risk charge at 17bps vs. 33bps and corporate/other at 77bps vs. 63bps respectively.

Total NPL ratio clearly improved at the end of December 2025 to 3.80% from 4.45% a year ago. Retail NPL ratio decreased markedly to 3.9% from 4.4% at the end of 2024, while in the corporate segment it dropped visibly to 3.5% from end December 2024 level of 4.7%.

Provisions for legal risk of FX-mortgage portfolio and other cost related to court cases and settlements with FX-mortgage borrowers continued to be a significant, yet decreasing, burden for the Bank with a negative impact on its P&L. In 2025 charges totalled PLN2,104 million vs. PLN2,850 million in 2024, which signifies strong decrease by 26% y/y. More details on FX-mortgage related charges and costs are presented in the preceding chapter of this report.

Effective tax rate in 2025 was higher than in the preceding year due to a combination the low base effect (recognition of DTA related to FX-mortgages in 2024), banking tax paid in full year 2025 versus only partially in 2024, and finally lower tax deductibility of FX-mortgage legal risk provisions.

The Group reported **net profit** of PLN1,202 million in 2025 and was 67% above the level recorded in the previous year. As explained above, the improvement was driven by a number of factors such as higher operating income, lower FX-mortgage charges and lower cost of risk. The negative drivers for the Group's profit were reinstated banking tax duty (no banking tax charge in the first five months of 2024), growing operating costs and higher corporate tax.

Adjusted for extraordinary items (i.a. FX-mortgage related costs and associated tax impacts) the Group would achieve **net profit of PLN3,222 million** in 2025 (up 1% y/y).

Reported 2025 **return on equity (ROE)** stood at 14.3%. Reported **Return on Assets (ROA)** for 2025 was 0.8%.

The breakdown of Group's Net Profit by the Group's companies is presented in the table below:

Group's profit structure <i>(PLN million)</i>	2025	2024
Bank Millennium	1 117	643
Millennium Bank Hipoteczny (mortgage bank)	38	17
Millennium Leasing	11	18
Millennium TFI (mutual funds management)	47	30
Millennium Service	20	32
Other consolidated companies	36	20
Summarised profits	1 269	760
Consolidation adjustments	(67)	(41)
Consolidated net profit of the Group	1 202	719

Bank's Profit and Loss Account

Changes of particular key items of the Bank's Profit and Loss Account in 2025 are shown in the table below.

Bank's net profit <i>(PLN million)</i>	2025	2024	y/y
Operating income	6 713	6 307	6%
Operating costs	(2 474)	(2 177)	14%
Impairment provisions and other cost of risk *	(223)	(277)	-20%
Provision for legal risk related to FX mortgage loans	(2 104)	(2 850)	-26%
Banking tax	(405)	(232)	74%
Pre-income tax profit	1 507	771	96%
Income tax	(389)	(127)	205%
Net profit	1 117	643	74%

(*) Impairment provisions for financial and non-financial assets including also fair value adjustment on loans (PLN0.6mn in 2025 and PLN0.7mn in 2024) and loans modification effect (PLN-3.1mn in 2025 and PLN-2.0mn in 2024);

Bank's operating income <i>(PLNm)</i>	2025	2024	y/y
Net interest income	5 612	5 421	4%
<i>Impact of credit holidays on net interest income</i>	-	(107)	-
<i>Net interest income without credit holidays</i>	5 612	5 527	2%
Net commission income	654	668	-2%
Core income	6 265	6 089	3%
<i>Core income without credit holidays</i>	6 265	6 196	1%
Other non-interest income*	447	218	105%
<i>of which dividends</i>	41	39	6%
Total operating income*	6 713	6 307	6%

(*) Without fair value adjustment of credit portfolio (PLN0.6mn in 2025 and PLN0.7mn in 2024), which is included in the cost of risk line

The Bank's (stand-alone) net interest income for 2025 amounted to PLN 5,612 million, increasing by 4% y/y. Similarly to the Group, the scale of growth was slightly overstated due to the impact of credit holidays booked by the Bank in 2024 (PLN 107 million). Net interest income excluding the cost of credit holidays would have increased by 2% y/y - a pace similar to that of the Group.

Net fee and commission income in 2025 amounted to PLN 654 million, recording a 2% y/y decrease. Core income reached PLN 6,265 million and grew by 3% y/y, in similar scale as the growth observed for the Group.

Other non-interest income of the Bank for 2025 totalled PLN 447 million, increasing significantly by 105% y/y. This category was largely driven by similar extraordinary items as in the case of the Group, described above (mainly costs related to FX mortgage loans and settlements with borrowers). One important component of this line is dividend income, mostly from the Bank's subsidiaries operating within the Capital Group (eliminated in the Group-level statements). Dividend income reached PLN 41 million in 2025, representing a 6% y/y increase.

As a result of the above developments, the Bank's total operating income for 2025 amounted to PLN 6,713 million, up 6% y/y - a similar scale to the entire Group.

The Bank's operating costs totalled PLN 2,474 million in 2025 and were 14% higher compared to 2024, also similar to the Group's trend. Changes in personnel expenses and other administrative costs followed similar patterns as for the Group and were largely driven by inflation.

Impairment charges and other risk costs of the Bank amounted to PLN 223 million in 2025, representing a 20% y/y decrease - again broadly in line with the Group.

In addition to credit risk provisions, the Bank incurred legal risk costs related to FX mortgage loans of PLN 2,104 million in 2025, as described above in the section concerning the Group.

The Bank reported a pre-tax profit of PLN 1,507 million for 2025, representing a significant 96% y/y increase — very similar to the trend at Group level - driven by lower extraordinary charges related to FX mortgage legal risk compared to 2024.

In 2025, the Bank reported a net profit of PLN 1,117 million, thus significantly higher (by 74%) compared to 2024, due to lower FX mortgage legal risk costs despite much lower income tax burden in the prior year, as explained earlier in the Group's profit discussion.

The Bank's return on assets (ROA) reached 0.8% for 2025.

8.2 Results of business segments

Presented below are data regarding the Profit and Loss Account for the Group's four business segments: retail segment, corporate segment, FX mortgage loans segment and treasury operations, assets/liabilities management and other segment. The retail segment comprises services provided to individual customers on the mass market, affluent customers, sole traders as well as services to small companies (with annual turnover below PLN5 million). The corporate segment involves services to to small (annual turnover above 5MPLN) medium and large companies as well as public sector entities. The treasury operations, assets/liabilities management and other business comprises the Group's treasury investments, interbank market transactions, taking positions in debt securities, brokerage activity as well as other transactions not classified in the first three segments.

Bank Millennium recent financial performance is significantly influenced by the costs related to managing legacy FX mortgage portfolio of loans. To isolate these costs and other financial results related to this portfolio Bank decided to isolate, commencing from 2021, a new segment from Retail and present it in financial statements as "FX mortgage". Such change impacts only results presentation and is not triggering any organizational changes in the Bank. The segment includes loans separated based on active FX mortgage contracts for a given period and is applying to portfolios of retail mortgages originated in Bank Millennium and Eurobank in foreign currencies. This portfolio is expected to run-off in line with repayments of FX loans, conversions to PLN loans, realization of court verdicts and write-offs.

Retail segment <i>(PLNmn)</i>	2025	2024	y/y
Net interest income*	4 557	4 675	-3%
Net commission income	565	563	0%
Other income**	73	110	-33%
Total operating income	5 196	5 348	-3%
Total operating costs	(1 902)	(1 661)	14%
Pre-provision income	3 294	3 687	-11%
Impairment provisions and other cost of risk**	(107)	(262)	-59%
Operating profit	3 187	3 424	-7%

(*) Part of interest income generated by this segment (so called liquidity premium) has been recognized in the third segment of "Treasury, ALM and other" in accordance to Recommendation P of the Polish regulator (KNF); (**) Fair value adjustment of credit portfolio (PLN0.6mn in 2025 and PLN0.7mn in 2024) has been moved to pro-forma cost of risk. Cost of risk includes also result from modification.

Total operating income of the retail segment in 2025 was PLN5,196 million, which represents a slight decrease by 3% y/y. Net interest income of the retail segment recorded a decline by 3% y/y reflecting the adverse impact of falling interest margin, mentioned above in the comments regarding Group's net interest income. Net commission income stayed on the similar level as in the previous year. Lack of growth of this item mainly resulted from lower bancassurance commissions. Operating costs of the retail segment grew by 14% y/y, slightly higher than for the whole Group.

As a result of the abovementioned evolution of operation income and costs, total retail segment pre-provision income reached PLN3,294mn and decreased by 11% vs. the level of 2024, mainly due to higher operating cost. The cost of risk of the segment presented a material decrease by 59% y/y.

Operating profit of the retail segment for 2025 - after consideration of the provisions - amounted to PLN3,187mn and decreased by 7% y/y. The profit was high in absolute terms and signified the key factor of the whole Group's profit, allowing to offset substantial loss of FX mortgage segment.

Corporate segment <i>(PLNmn)</i>	2025	2024	y/y
Net interest income *	809	872	-7%
Net commission income	205	204	0%
Other income	113	107	6%
Total operating income	1 127	1 183	-5%
Total operating costs	(406)	(327)	24%
Pre-provision income	721	856	-16%
Impairment provisions and other cost of risk**	(130)	(103)	26%
Operating profit	591	753	-22%

(*) Part of the interest income generated by this segment (so called liquidity premium) has been recognized in the segment of "Treasury, ALM and other" in accordance to Recommendation P of the Polish regulator (KNF); (**) Cost of risk includes also result from modification.

Total operating income of the corporate segment in 2025 stood at PLN1,127mn and decreased by 5% compared to the level of 2024. This was first of all the result of lower net interest income due to margin compression in deposits partially offset by gradual growth of loan volumes. Net commission income kept the similar level as in the previous year and other non-interest income increased by 6% y/y. Operating costs of the corporate segment saw a considerable increase by 24% y/y reflecting the implementation of the Bank's new strategy.

As a result of the above, pre-provision income decreased by 16% y/y. Value of net impairment write-offs regarding loans to companies in 2025 amounted to PLN130mn and it was 26% higher than in the previous year. Taking all above factors together, the operating profit of the corporate segment saw a decrease of 22% y/y to the level of PLN591mn in 2025.

Treasury, ALM and other segments (PLNmn)	2025	2024	y/y
Net interest income*	392	(10)	4191%
Net commission income	2	3	-41%
Other income	93	78	19%
Total operating income	486	72	579%
Total operating costs	(154)	(126)	22%
Pre-provision income	333	(55)	707%
Impairment provisions and other cost of risk	(20)	(4)	367%
Operating profit	313	(59)	629%

(*) Part of the interest income generated by other segments (so called liquidity premium) has been recognized in the segment of "Treasury, ALM and other" in accordance to Recommendation P of the Polish regulator (KNF).

Total operating income of the Treasury, ALM and other segments in 2025 recorded a positive value of PLN486 million and it was much higher, i.e. by 579% vs. the value for 2024. Net interest income was strongly positive and amounted to PLN392 million (a negative value in the previous year) driven by much larger bond portfolio. Operating costs increased by 22% y/y. As a result operating result of the entire segment amounted to PLN313mn for 2025.

FX Mortgage (PLNmn)	2025	2024	y/y
Net interest income*	(2)	(7)	70%
Net commission income	3	6	-45%
Other income	126	(81)	257%
Total operating income	128	(82)	256%
Total operating costs	(95)	(138)	-31%
Pre-provision income	32	(220)	115%
Impairment provisions and other cost of risk**	(2 097)	(2 791)	-25%
Operating result	(2 065)	(3 011)	31%

(*) Part of the interest income generated by other segments (so called liquidity premium) has been recognized in the segment of "Treasury, ALM and other" in accordance to Recommendation P of the Polish regulator (KNF)

(**) Including legal risk provisions for FX mortgage portfolio and result on modification

Following P&L categories are presented as part of financial performance of FX Mortgage segment:

1. Net Interest Income: Margin on FX loans (interest results less Fund Transfer Pricing).
2. FX results related to portfolio (mainly costs of amicable negotiations).
3. Cost of provisions for FX mortgage portfolio legal risk partially offset by valuation of SG Indemnity in other operating income line regarding ex-EB portfolio.
4. Cost of Credit Risk related to current FX portfolio.
5. Result on modification resulting from settlements with borrowers.

6. Other Costs that are directly related to FX mortgages including, but not limited to:
- i. Legal chancellery costs (administrative costs),
 - ii. Court costs related to FX mortgage cases (other operating costs).

Total operating loss of the FX Mortgage segment in 2025 was PLN2,065 million, due to high provisions for legal risk related to the loan book and costs of settlements (total cost of risk amounted to PLN2,097 million) as well as the material impact of legal costs in operating costs. However operating costs in 2025 were lower by 31% than in the previous year. As a result of the above, operating loss for 2025 was significantly lower by PLN945 million vs. the previous year.

More information on business segments of the Group can be found in Chapter 9 "Operational Segments" of the Annual Financial Statements of Bank Millennium S.A. Capital Group for the period of 12 months ending on 31 December 2025.

8.3 Balance sheet and off-balance sheet items

Assets

The Group's assets as at 31 December 2025, amounted to PLN155,673 million, recording a growth of 12% vs. 31 December 2024. The structure of the Group's assets as well as changes of their particular components are presented in the table below:

Group's Assets (PLN million)	31.12.2025		31.12.2024		y/y
	Value	Structure	Value	Structure	(%)
Cash and operations with the Central Bank	4 360	2.8%	5 179	3.7%	-16%
Loans and advances to banks	351	0.2%	435	0.3%	-19%
Loans and advances to clients	76 416	49.1%	74 865	53.9%	2%
Receivables from securities bought with sell-back clause	99	0.1%	194	0.1%	-49%
Debt securities	70 222	45.1%	54 207	39.0%	30%
Derivatives (for hedging and trading)	155	0.1%	256	0.2%	-39%
Shares and other financial instruments*	236	0.2%	147	0.1%	60%
Tangible and intangible fixed assets**	1 167	0.7%	1 067	0.8%	9%
Other assets	2 667	1.7%	2 515	1.8%	6%
Total assets	155 673	100.0%	138 864	100.0%	12%

(*) including investments in associates; (**) excluding fixed assets for sale

The most visible moves within assets during the period of the last twelve months were growth of debt securities (by PLN16 billion or 30%) whereas loans to customers grew by PLN1.4 billion.

Loans and advances to clients

Total **net loans** of Bank Millennium Group reached PLN 76,416 million as of December 2025, showing a slight growth of 2% y/y whereas loans excluding FX-mortgage loans grew more, i.e. 3% y/y. FX-mortgage loans net of provisions decreased significantly over the last twelve months (down 46% r/r), and the share of FX mortgage loans (excluding those taken over from Euro Bank) in total gross loans dropped substantially over the year to 0.8% from 1.5% a year earlier. This was partly due to the fact that most of the legal risk provisions reduce the gross value of the loans, apart from regular amortisation, early repayments, conversions to PLN, and enforcement of court judgments.

The net value of loans to households amounted to PLN 54,745 million on 31 December 2025, reflecting a decrease of 4% y/y. The contraction of this this portfolio was primarily due to the decline in the value

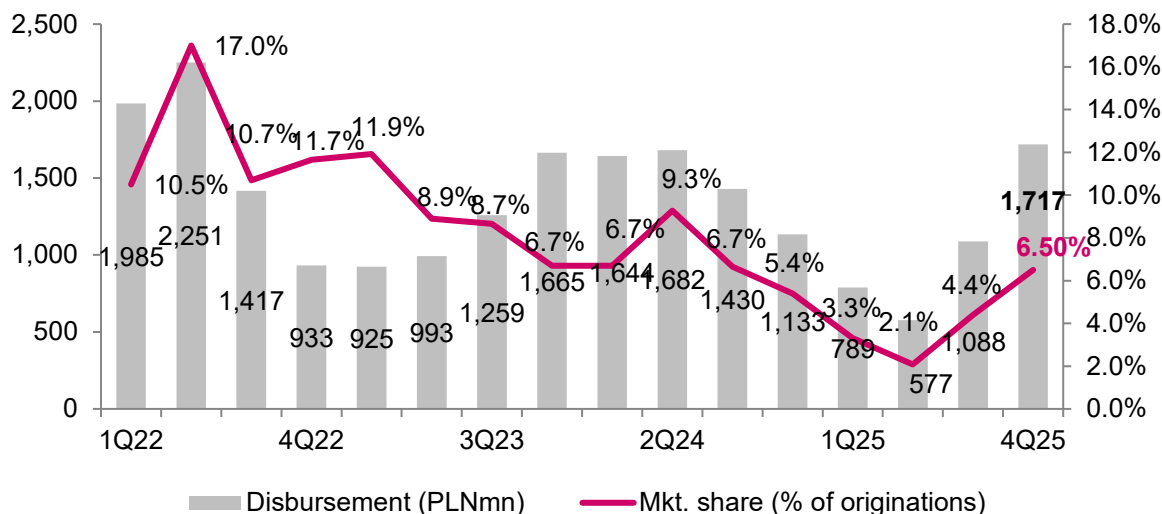
of mortgage loans, both FX and PLN. Within the household loan segment, PLN mortgage loans amounted to PLN34 933million and decreased by 6% y/y. The origination of new mortgage loans was much lower in 2025 than in 2024 (PLN4.2billion, down 29% y/y) although strong rebound was seen in 2H25.

The structure and evolution of loans to clients of the Group is presented in the table below:

Loans and advances to clients (PLNmn)	31.12.2025	31.12.2024	y/y
Loans to households	54 745	56 825	-4%
- <i>PLN mortgage loans</i>	34 933	37 210	-6%
- <i>FX mortgage loans</i>	713	1 314	-46%
- <i>of which Bank Millennium loans</i>	615	1 127	-45%
- <i>of which ex-Euro Bank loans</i>	98	187	-48%
- <i>consumer loans</i>	19 098	18 301	4%
Loans to companies and public sector	21 671	18 040	20%
- <i>leasing</i>	7 200	6 948	4%
- <i>other loans to companies and factoring</i>	14 471	11 092	30%
Net loans & advances to clients	76 416	74 865	2%
<i>Net loans and advances to clients excluding FX mortgage loans</i>	<i>75 702</i>	<i>73 551</i>	<i>3%</i>
Impairment write-offs	2 363	2 514	-6%
Gross* loans and advances to clients	78 779	77 379	2%

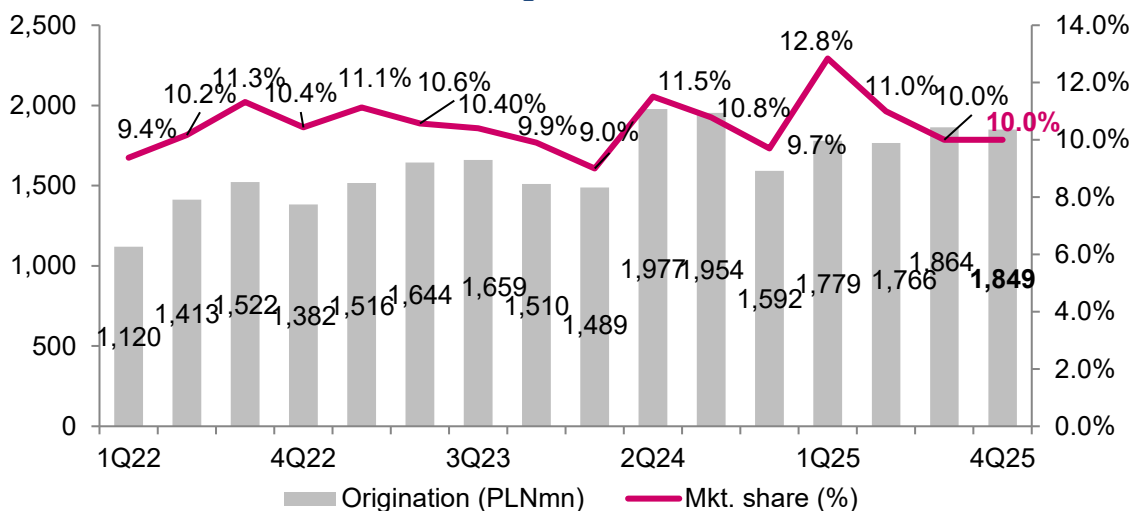
(*) Including, besides provisions for credit risk, also fair value adjustment of loan portfolio presented in fair value as well as modification. Gross loan portfolio in this case presents value of loans and advances before mentioned provisions and adjustments but after allocating legal risk provisions related to FX mortgage loans.

Mortgages: disbursement and market share in originations



Another component of the retail loans, consumer loans, showed a positive performance. The net value of consumer loans portfolio reached PLN19,098 million on 31 December 2025, increasing by 4% y/y. Origination of consumer loans was high in 2025, reaching PLN7.3 billion which was 4% higher vs the new loans origination in 2024.

Cash loans: origination and market share



The net value of loans to companies amounted to PLN 21,671million on 31 December 2025, showing a strong 20% growth y/y. The growth of the loan portfolio was mostly visible in corporate loans sub-segment (up 30% y/y), while leasing portfolio increased 4% y/y.

Average interest rate on the Bank's loan portfolio in 2025 was 7.6%. This rate includes net interest income on hedging derivatives (mainly FX and interest rate SWAPs).

Debt securities

Value of debt securities reached PLN70,222 million on 31 December 2025, which means a significant increase of 30% y/y.

A dominant part of the debt securities portfolio (97%) were bonds and bills issued by the Polish State Treasury, other EU governments and National Bank of Poland (the central bank). The increase of debt securities portfolio was a consequence of a much stronger growth of deposits versus loans. The share of this group of debt securities in the consolidated total assets was at 44% vs. 37% at end of December 2024 reflecting a strong liquidity position of the Group.

More information on debt securities and liquidity management of the Bank can be found in later part of this report and in Chapter 8.5. "Liquidity Risk" of the Annual Financial Statements of Bank Millennium S.A. Capital Group for the period of 12 months ending on 31 December 2025.

Deposits, loans and advances to banks

Deposits, loans and advances to banks (including interbank deposits) stood at PLN351 million at 31 December 2025, which means a decrease by 19% y/y and it mainly refers to current accounts balances.

Derivative instruments

The value of derivatives (for trading and hedging) totalled PLN155 million at end of December 2025 (a decrease by 39% y/y), and refers to positive valuation of derivatives whereas negative valuation of derivative instruments is presented on the liabilities side. The main component of derivatives are FX swaps and other FX derivatives, cross-currency swaps and interest rate swaps. The valuation of those instruments mainly depends on changes in FX rates and interest rates level.

The Group manages its FX liquidity using FX-denominated deposits, own issue of EUR bonds as well as Cross Currency Swap and FX Swap transactions. The importance of swaps has been decreasing because of the reduction of the FX mortgage loan portfolio and the hedge in foreign currency of most of the provisions for legal risk. The swaps portfolio is diversified in term of counterparties and maturity dates.

More information on derivative transactions of the Bank can be found in Note 19E and Note 24 and in Chapter 8.5. "Liquidity Risk" of the Annual Financial Statements of Bank Millennium S.A. Capital Group for the period of 12 months ending on 31 December 2025.

Shares/equities and other financial instruments

Value of equities/shares and other financial instruments amounted to PLN236 million at the end of December 2025 and increased 60% y/y.

Tangible fixed assets and intangibles and goodwill (investment outlays)

Tangible fixed assets and intangibles and goodwill of the Group amounted to PLN1,167 million at the end of December 2025 and increased by 9% y/y mostly due to the growth of intangible assets (+14% y/y) whereas tangible fixed grew 5% y/y.

Total investment of the Group in 2025 amounted to PLN 180 million. Outlays for the Bank's physical infrastructure (headquarter modernization, branches, ATMs etc.) amounted to PLN 33.1 million and PLN 143.3 million for software and IT infrastructure. Value of other outlays i.e. PLN 3.9 million, relates to Bank's subsidiaries. The Bank Millennium Group plans investment capital expenditures in 2026 in the amount of ca. PLN 287 million, out of which ca. 80% will be allocated to IT projects (i.e. further internet and mobile banking developments, capacity extensions as well as regulatory & security projects).

Group's Liabilities

The structure of Group's liabilities and equity and the changes of their particular components are presented in the table below:

Group's Liabilities and Equity (PLNmn)	31.12.2025		31.12.2024		y/y
	Value	Structure	Value	Structure	(%)
Deposits from banks	103	0.1%	204	0.2%	-50%
Deposits from customers	130 807	89.3%	117 257	89.4%	12%
Liabilities from securities sold with buy-back clause	0	0.0%	194	0.1%	-100%
Financial liabilities valued at fair value through P&L and hedging derivatives	271	0.2%	519	0.4%	-48%
Liabilities from issue of debt securities	7 641	5.2%	6 125	4.7%	25%
Provisions	3 747	2.6%	2 952	2.3%	27%
Subordinated debt	1 558	1.1%	1 562	1.2%	0%
Other liabilities*	2 421	1.7%	2 369	1.8%	2%
Total liabilities	146 548	100.0%	131 182	100.0%	12%
Total equity	9 126		7 682		19%
Total liabilities and equity	155 673		138 864		12%

*including tax liabilities

At the end of December 2025 liabilities accounted for 94.1%, while equity of the Group - for 5.9% of total liabilities and equity.

As on 31 December 2025 Group's total liabilities amounted to PLN146,548 million and were higher by 12% relative to their value as on 31 December 2024. The main change to liabilities resulted from strong increase of deposits by PLN13.6 billion, i.e. and also the issuance of debt securities (balances higher by PLN1.5 billion).

Customers' deposits

Customer deposits constituted the main item of the Group's liabilities, accounting for, as on 31 December 2025, 89% of total liabilities. Customer deposits constitute the main source of financing of Group's activities and incorporate, primarily, customer funds on current and saving accounts as well as on term deposit accounts.

The evolution of clients deposits is presented in the table below:

Customer deposits (PLNmn)	31.12.2025	31.12.2024	y/y
Deposits of individuals	98 379	87 567	12%
Deposits of companies and public sector	32 429	29 690	9%
Total deposits	130 807	117 257	12%

Total customer deposits amounted to PLN130 807 million on 31 December 2025 and grew 12% y/y. Deposits of individuals reached PLN98,379 million on 31 December 2025 and posted high growth of 12% y/y. The growth evolved very positively in terms of its structure: current and saving accounts grew

by a high 19% y/y whereas term deposits from retail clients stayed on similar level, thus the first mentioned group reached the share of 69.5%.

Deposits of companies and public sector, which reached PLN32,429 million on 31 December 2025, increased 9% y/y due to a strong growth in current account deposits by 15% y/y, whereas term deposits from companies slightly contracted 2% y/y.

Loans-to-deposits (L/D) ratio decreased to a new all-time low of 58% on 31 December 2025.

Average interest rate on all deposits in the Bank in 2025 amounted to 2.1%.

Deposits from banks

Deposits from banks, including credits received, as on 31 December 2025, amounted to PLN103 million. Value of this item decreased noticeably by 50% relative to the balance as on 31 December 2024, mainly in effect of a decline in balances of term deposits from financial institutions (not significant amounts in absolute terms), but the Group did not record any credits from financial institutions.

Financial liabilities valued at fair value through Profit and Loss Account and derivative instruments

Financial liabilities valued at fair value through Profit and Loss Account and derivative instruments included, primarily, negative valuation of derivatives for trading or hedging and liabilities resulting from securities subject to short sale. Value of this item, as on 31 December 2025, amounted to PLN271 million, showing a decline by 48% relative to the balance as on 31 December 2024. The changes of valuation (positive and negative) of derivatives has been described in above comments regarding Group's assets.

Provisions

The value of provisions as on 31 December 2025 was PLN3,747 million. The key component of this line were provisions for legal issues, (especially claims related to FX mortgage loan agreements not including the value of provisions directly allocated to the loan portfolio), amounting to PLN3,443 million. The provisions item recorded a significant growth by PLN 795 million, i.e. by 27% y/y. During 2025 the new provisions created for the legal risk of FX mortgage loans amounted to PLN2,056 million

Debt securities issued

Securities issued by the Group amounted to PLN7,641 million as on 31 December 2025 recording significant increase by, PLN1,516 million (i.e. by 25% y/y) relative to the balance as on 31 December 2024. The increase resulted mainly from the issue of the covered bonds issued by Millennium Bank Hipoteczny, the Bank's subsidiary, whereas part of the Bank's bonds was redeemed.

In December 2022 the Bank issued Credit Link Notes ('CLNs') in the amount of PLN242.5 million within a synthetic securitisation transaction related to corporate loans. Additionally, in 2023 as a part of synthetic securitisation transaction, the Bank issued PLN489 million worth of CLNs, while Millennium Leasing (a subsidiary of the Bank) issued PLN280 million worth of CLNs. In 2024 and in 2025 the Bank redeemed part of its CLNs. Total value of CLNs outstanding on 31 December 2025 stood at PLN694 million.

In order to meet MREL requirements, the Bank issued senior non-preferred bonds in September 2023 with a total value of EUR 500 million and in September 2024 it issued similar bonds with a total value of EUR 500 million too, both issues under the Euro Medium Term Notes Issuance Program with a total nominal value of no more than EUR 3 billion.

In 2024, the Bank's subsidiary Millennium Bank Hipoteczny, a mortgage bank, issued covered bonds of total nominal value of PLN800 million and in 2025 it issued covered bonds of total nominal value of PLN1,800 million.

Subordinated debt

The value of subordinated debt amounted to PLN1,558 million on 31 December 2025, and remained at almost the same level vs. 31 December 2024 (a slight difference results from interest accrued and paid). The subordinated debt line includes ten-year subordinated bonds in PLN at the total nominal value of PLN830 million maturing in January 2029 and ten-year bonds in PLN at the total nominal value of PLN700 million maturing in December 2027.

Equity

As on 31 December 2025, equity of the Group amounted to PLN9,126 million and recorded an increase by PLN1,443 million or 19% y/y. Apart from net profit generated in 12 months period (PLN1,202 million), the increase of equity was supported by positive impact of other comprehensive income items (PLN242 million), mainly valuation of bonds and, to lesser extent, shares and hedge instruments.

Information on capital adequacy is presented in Chapter 11.2 of this document and in Chapter 8.2. "Capital Management" of the Annual Financial Statements of Bank Millennium S.A. Capital Group for the period of 12 months ending on 31 December 2025.

Unconsolidated Bank's Assets and Liabilities

Bank's unconsolidated assets, as on 31 December 2025 reached the value of PLN152,544 million and were 11% higher compared to the level as at the end of 2024. Structure of the Bank's assets and changes of individual components are presented in table below:

Bank's Assets (PLN million)	31.12.2025		31.12.2024		y/y
	Value	Structure	Value	Structure	(%)
Cash and operations with the Central Bank	4 360	2.9%	5 179	3.8%	-16%
Loans and advances to banks	2 081	1.4%	2 379	1.7%	-13%
Loans and advances to clients	71 902	47.1%	71 820	52.3%	0%
Receivables from securities bought with sell-back clause	99	0.1%	194	0.1%	-49%
Debt securities	69 731	45.7%	53 654	39.0%	30%
Derivatives (for hedging and trading)	157	0.1%	257	0.2%	-39%
Shares and other financial instruments	824	0.5%	621	0.5%	33%
Tangible and intangible fixed assets*	1 159	0.8%	1 056	0.8%	10%
Other assets	2 230	1.5%	2 253	1.6%	-1%
Total assets	152 544	100.0%	137 413	100.0%	11%

* excluding fixed assets for sale

A key difference between the Bank's stand-alone asset size and the Group's consolidated assets is the value of loans to customers. This primarily concerns mortgage loans transferred to a subsidiary — the

mortgage bank – with a total balance of PLN 4,618 million at the end of 2025, as well as receivables from the leasing company's customers amounting to PLN 7,359 million (a significant portion of which continued to be financed by the Bank). It also reflects the elimination of mutual transactions between the Bank and other companies within the Capital Group in the consolidated financial statements.

The total value of the Bank's loans to customers amounted to PLN 71,902 million as at 31 December 2025 and remained at a similar level as at the end of the previous year. As in the case of the Group, the loan portfolio dynamics were significantly affected by the substantial decline in FX mortgage loans.

The value of debt securities in the Bank's assets reached PLN 69,731 million at the end of December 2025. Both the growth rate and the structure of this portfolio were very similar to those of the Group (as described above), although the higher value at Group level (by PLN 491 million) results from sovereign securities held by the Bank's subsidiaries: Millennium Leasing and Millennium Bank Hipoteczny.

Receivables from banks (including interbank deposits) reached PLN 2,081 million at the end of December 2025, representing a 13% y/y decrease. The different development of this item compared to the Group reflects funding provided by the Bank to its subsidiary Millennium Bank Hipoteczny.

Equity investments and other financial instruments presented in the Bank's stand-alone financial statements — unlike in the Group's consolidated financial statements — include the valuation of shares in subsidiaries. The value of this item amounted to PLN 824 million as at 31 December 2025, marking a 33% y/y increase.

The Bank's property, plant and equipment and intangible assets amounted to PLN 1,159 million at the end of December 2025, representing a 10% increase compared to the previous year.

Values and annual changes to other asset groups presented in the table above are similar to the corresponding items of consolidated Group, as described earlier in this document.

The non-consolidated Bank's liabilities as at 31 December 2025 reached the value of PLN 143 781 million and were 10% higher compared to the end of 2024. Structure of the Bank's liabilities and equity as well as changes of their particular components are presented in the table below:

Bank's Liabilities and Equity (PLN million)	31.12.2025		31.12.2024		y/y (%)
	Value	Structure	Value	Structure	
Deposits from banks	106	0.1%	211	0.2%	-50%
Deposits from customers	131 199	91.2%	117 643	90.3%	12%
Liabilities from securities sold with buy-back clause	0	0.0%	194	0.1%	-100%
Financial liabilities at fair value through P&L and hedging derivat.	271	0.2%	519	0.4%	-48%
Liabilities from issue of debt securities	4 803	3.3%	5 030	3.9%	-5%
Provisions	3 743	2.6%	2 948	2.3%	27%
Subordinated debt	1 558	1.1%	1 562	1.2%	0%
Other liabilities*	2 101	1.5%	2 110	1.6%	0%
Total liabilities	143 781	100.0%	130 217	100.0%	10%
Total equity	8 763		7 196		22%
Total liabilities and equity	152 544		137 413		11%

(*) including tax liabilities

The value of customer deposits of the Bank reached PLN131,199 million as on 31 December 2025 and was higher by PLN392 million than the balance for the Group (mainly effect of intra-group elimination). Deposits, similar to the Group's case, grew by 12% y/y.

Debt securities issued by the Bank amounted to PLN4,803 million as on 31 December 2025 and were lower compared to the corresponding item of Group's liabilities. The difference resulted from the issue of debt by Bank's subsidiaries: the issue of covered bonds mortgage bank and the issue of CLNs by Millennium Leasing, which was explained above in the part related to Group's liabilities.

The values and annual changes of other key items of non-consolidated Bank's liabilities are similar to those of their equivalents in the consolidated reports for the Group, as discussed above in this part of the report.

Bank's equity, as on 31 December 2025, amounted to PLN8,763 million and recorded an increase by 22% y/y.

Contingent liabilities

The structure of contingent liabilities of the Group is presented in the table below:

Group's Contingent Liabilities <i>(PLN million)</i>	31.12.2025	31.12.2024	y/y (%)
Total contingent liabilities	19 569	16 172	21%
1. Liabilities granted:	16 750	13 441	25%
a) financial	14 673	11 754	25%
b) guarantees	2 076	1 687	23%
2. Liabilities received:	2 819	2 731	3%
a) financial	0	0	-
b) guarantees	2 819	2 730	3%

Through these operations the Group executes transactions generating conditional liabilities. The main items under conditional liabilities (granted) are as follows: (i) financial liabilities mainly relative to loan prolongation (including, inter alia, not utilised credit card limits, not utilised overdraft facilities, not utilised tranches of investment loans) and (ii) guarantees, including mainly guarantees and letters of credit issued by the Group (to secure performance of obligations undertaken by Group's customers vis a vis third parties). Granted conditional liabilities result in Group's exposures to various risks, including credit risk. The Group creates provisions against irrevocable risk based conditional liabilities booked in the line item "Provisions" on the liability side of the balance sheet.

As on 31 December 2025, the total value of conditional liabilities of the Group amounted to PLN19,569 million, including liabilities granted by the Group at the level of PLN16,750 million which signify a considerable growth of this item by 25% following loans underwriting (financial contingent liabilities) and issued guarantees. Financial liabilities represented 88% of total Group's liabilities granted.

More information on the issue of conditional liabilities can be found in Chapter 12 of the Consolidated Annual Financial Statements of Bank Millennium S.A. Capital Group for the period of 12 months ending on 31 December 2025.

9. Presentation of business activity

9.1 Innovation and highest quality of positive customer experience

Bank Millennium cares about building positive customer experiences at every stage of clients' cooperation with the Bank. High quality of experiences is the basic direction in the design of products and services, sales and after-sales service - in all contact channels. Thanks to this, in 2025 Bank Millennium strengthened its position as a quality leader and as one of the most innovative institutions in the banking sector.

Bank Millennium's goal in 2025 was to strengthen the bank's position in the NPS indicator and score at TOP3.

The Bank achieved its strategic goal, securing a TOP3 position in the retail segment — both among customers declaring a primary banking relationship and those maintaining an additional relationship.

In corporate banking, the Bank maintained its leading NPS position, supported primarily by the strong relationships that business clients have with their banking advisors. **This high recommendation rate provides a solid foundation for the Bank's further growth in this segment.**

For years, Bank Millennium has consistently strived to ensure that the customer's transition to electronic service supports the quality of the relationship with the bank. We combine service through a mobile application with access to qualified telephone and branch advisors - in all business lines. Remote advisor service has increased the convenience of access to the Bank's services and products. We make sure that both customers and employees are prepared for new digital solutions. The Bank has conducted projects focused on the customer perspective in the area of education and security.

Bank Millennium used research as well as qualitative and quantitative monitoring to support business projects. Key areas for improving customer experience, measured among others by the NPS indicator, are diagnosed, prioritized and transferred for implementation on ongoing basis.

We planned customer and employee research for all product lines, business lines, channels and segments. The surveys concerned:

- satisfaction and loyalty monitoring,
- brand awareness among customers,
- evaluation of product concepts,
- employee perspectives.

An important source of information in quality activities are the bank's Mystery Shopper surveys. In 2025, we conducted 2,825 audits in our own and franchise branches.

Bank Millennium conducted activities that directly affect customer satisfaction. We implemented a new model for working with the voice of the customer in the retail branch network, which includes:

- Mystery Shopper survey results,
- CSAT,
- Google reviews,
- analysis of complaints caused by the branch.

We analyse the collected voice of the customer and work on eliminating the causes of dissatisfaction to further improve the customer experience.

At Bank Millennium, managers are supported in managing the voice of the customer by a field team of CX Leaders. CX Leaders also work with advisors and pay attention to elements that negatively affect cooperation with the client. Thanks to increased work with the voice of the customer, in 2025 we can see a decrease in the number of complaints caused by branches, a stable level of customer satisfaction in the CSAT survey and a downward trend in negative Google reviews.

We are changing and improving service models that address business and quality goals resulting from the Bank's strategy. We present customers with a full picture of banking possibilities from the very beginning.

Bank Millennium continues to work on simplifying the language of communication and the content of documents. We are changing the texts provided to customers from the moment of opening an account to information on the use of their products.

At Bank Millennium, we are building awareness and the importance of plain language in communication - we regularly organize activities related to Plain Language Day.

Bank Millennium has continued to work on increasing the accessibility of its products and services for individuals with disabilities and functional needs. The Bank is working intensively with the Polish Bank Association to develop common accessibility standards. An important element of the work is to adapt bank documents to an appropriate format that will allow them to be read by people with diverse functional needs.

Bank Millennium conducted training sessions where employees could familiarize themselves with the principles of plain language and accessibility, as well as the guidelines they should follow when serving customers and creating documents. In 2025, we trained 140 employees on this topic.

In addition to the quality of products and services in the channels, NPS is determined by the image and trust in the Bank, as well as the experience of employees. The overall participation rate in the employee satisfaction survey completed in 2025 was 73% (10 p.p. higher than a year ago and 22 p.p. higher compared to the 2023 survey). 70% of respondents were generally satisfied with their employment. Overall job satisfaction does not differ significantly in terms of areas, roles, locations or work experience.

The results of the employee satisfaction survey provide material for teams throughout the organization. Meetings of employees with members of the management board organized in the bank are a source of inspiration for further improvement of internal processes and ideas that can increase customer satisfaction with the offer and service.

In 2025, Bank Millennium was recognized in the most important quality rankings. It won awards for service quality in the areas of retail, affluent and business customers:

in the Newsweek Friendly Bank ranking:

- first place in the Traditional Banking category,
- first place in the Remote Module category;

in the Forbes magazine ranking:

- first place in the Bank for the Wealthy Customer category,
- a podium position in the Friendly Bank for Companies category;

in the Golden Bank ranking:

- the title of Golden Bank 2025 for the Best Multichannel Service Quality,
- first place for the highest quality of service on the helpline,
- a podium position for the highest quality of service via chat and email.

In the Institution of the Year ranking, Bank Millennium was awarded in seven categories:

- Best service in remote channels,
- Best account opening process in the branch,
- Best mortgage service in the branch,
- Best bank for companies,
- Best mobile app,
- Best online banking,
- Best service in the branch.

Bank Millennium also received the individual CX Leader award in the Institution of the Year ranking.

9.2 Retail banking

Current Accounts

Number of active clients has reached over 3.27 million with growth of active clients of almost 145 thousand in 2025 alone.

Sales of current accounts in 2025 amounted to over 398 thousand. The key acquisition product was flagship *Millennium 360°* account. 54% current accounts were opened via online. The number of accounts in the Bank's portfolio reached 3.85 million, with 30% share of *Millennium 360°* account. After 3Q25, the Bank achieved a market share measured by the number of accounts at the level of 9,32% (according to the Puls Biznesu report).

The promotion and acquisition of *Millennium 360°* accounts in 2025 was supported by:

- reach-based and contextual activities on the Internet (banner ads, video ads on portals and social media, collaborations with influencers),
- reach-based advertising campaigns on television,
- activities in cooperation with external online portals,
- increasing the scale of account opening in online processes with the support of a Bank employee.

Saving and Investment Products

Year 2025 was a period of high although gradually decreasing market interest rates and still high growth of retail deposits. In 2025 retail deposits in whole banking sector grew by over PLN88 billion (data for Jan-Nov) of which current and saving deposits increased by PLN74.9 billion, with PLN13.5 billion growth of term deposits. In this market situation, the Bank focused on placing deposit offer in both savings accounts and term deposits in a way that allows volume growth while taking care of portfolio profitability.

New volumes were acquired mainly on *Profit saving account* but also on new money time deposits with attractive remuneration. Parallely to increased deposit acquisition we have improved retention offers both in digital channels and branches.

Total retail deposits in Bank Millennium in 2025 increased by PLN11.3 billion to the level of PLN102 billion (individual clients and microbusiness) and market share at the end of December 2025 was 7,25%.

In terms of investment products year 2025, was time of very positive sentiment on global capital markets. Especially debt investment funds attracted substantial volumes and showed yields competitive to deposit rates. In total, the investment assets of the bank's clients invested in mutual funds and investment-insurance funds increased by PLN4.2 billion and amounted to nearly PLN15 billion.

The Bank continued its strategy to offer diversified portfolio of investment products including both own solutions and products offered by external partners. Depending on client segment the offer included structured products, mutual funds and bonds.

The Bank continued activities promoting regular investments especially through investment advisory service based on selected and adjusted Millennium TFI funds (mutual funds) which in easy and convenient way enables customers entrance to investment products even of small amounts. During 2024 around 30 thousand new customers decided to invest through advisory service and number of customers investing regularly increased to around 80 thousand.

In order to make the offer more attractive, during the year the Bank launched cyclical promotions of funds with regards to the fee for their purchase. A special strategy was also continued to reward the use of remote channels by reducing to 0% the handling fee rates for purchase of selected TFI funds through Millenet and Mobile Application

Cash Loans

In the area of cash loans, Bank maintained its sales volume at a similar level. Compared to the previous year, in 2025 the sales of Cash Loans for individual clients increased by 3.5%, reaching nearly PLN 7.3 billion. This allowed the Bank to achieve a market share of 10% in loan sales. The share in the loan portfolio amounted to 8.7%. The dominant loan sales channel was the digital channel, which accounted for 34% of sales by value and 59% of all applications. As much as 89% of all loan applications in the Bank were finalized in the digital channel, representing an increase of another 14 pp compared to 2024. Bank actively acquired new customers. An important source of sales for new loans was the growing volume of lending to customers acquired through instalment loans. The Bank also placed strong emphasis on the development and enhancement of electronic channels, particularly the mobile application, which is reflected in the channel's results. Throughout the year, the Bank pursued an active pricing policy, offering customers attractive promotions and special offers.

Overdrafts

Despite a slight loss of market share in new overdraft limit sales (10.19%, a decrease of 0.8 pp compared to 2024), the Bank maintained its market share in the utilized overdraft balance at 13.4% (-0.1 pp). This indicates that customers are increasingly willing to use the overdraft facility offered by the Bank.

Insurance Products (Bancassurance)

In 2025, the Bank continued its strategic insurance partnership with the Europa Insurance Group, focused on the long-term development of the bancassurance area. Banks' activities covered development of offers within insurance linked to credit products as well as expansion of unrelated insurance offerings.

During the period under review, the Bank's offerings were expanded to include new assistance insurance solutions, including the "Your Prestige Assistant" product, aimed at affluent clients. Coverage includes medical, home, legal, IT assistance and phone screen repair services. Insurance is also available through the Bank's mobile app, with the option to conveniently submit claims through this channel.

In 2025, the Bank also launched a stand-alone property insurance offering, available through the mobile app and the telephone channel. The product is targeted at homeowners, tenants, investors, and owners of homes under construction.

Additionally, the Bank has introduced the possibility of benefiting from a preferential margin on a mortgage loans in the event of concluding a life insurance contract offered by the Bank as part of a cross-sell offer.

Payment Cards

In 2025, there was another significant increase in the payment cards portfolio, both in terms of the number of cards issued and transaction volume.

The Bank maintained the upward trend in the payment card portfolio with the result of 4.2 million cards at the end of December 2025 (+5.5% y/y). The turnover in 2025 amounted to PLN 89.010 million on debit cards (+7.5% y/y) and PLN 8.259 million on credit cards (+11% y/y). This result was supported by new product solutions.

In June 2025 we have introduced a new process for personal account holders to order a debit card directly from the bank's mobile application.

In June 2025, we implemented option to change credit card types. Customers who require higher credit limits and better services, they don't need to apply for a new card, they can easily and conveniently exchange their current card for another card type from our current offer.

In July 2025, we launched BLIK recurring payments for our customers. This new payment method allows customers to pay for recurring obligations, that require recurring payments, such as subscriptions, utility fees.

At the end of December 2025, the credit card portfolio increased to 540 thousand cards and increased by 22 thousand cards (+4.2% y/y). This allowed Bank Millennium's market share to increase to 10.6% in 3Q25. Thanks to intensive portfolio activities, Bank Millennium's market share in spending increased in 3Q25 to 10.7%.

Mortgages

In 2025, the mortgage loan market recorded a sales increase of around 17% compared to 2024. The Bank concluded over 12,000 new commitments with a total value exceeding PLN 4.8 billion (down nearly 17% y/y) and ranked 8th in the market with a sales share of almost 4%.

The Bank implemented a number of projects, including regulatory ones, as well as further improvements in the process of granting and servicing mortgage loans, i.a.:

- Launch of a new customer promotion – Eco Promotion
- Implementation of a new cross-sell offer including life insurance
- Compliance with the Accessibility Act requirements
- Digitalization of the process for submitting mortgage-related document instructions (customer self-service portal)

The Bank's lending campaign, similarly, to last year, was based on the offer of unconditional 0% commission for granting a loan and 0% commission for early and full repayment of the loan.

Prestige and Private Banking segment - offer for an affluent clients

In 2025, the Bank continued to implement its strategy of developing offerings dedicated primarily to Affluent clients:

- **New Millennium 360 Prestige Account** – launched in January as a comprehensive solution including a personal account, debit card, “Your Prestige Assistant” insurance, and the “Cashback on Purchases” service. Alongside the product launch, a remote conversion process was introduced for holders of individual accounts, enabling them to change account type and insurance in just a few simple steps.
- **Expansion of the Visa Global Credit Card Offering** – in June, a process for increasing the credit limit on the Visa Global card was made available via the mobile app and Milledesk. In October, the Visa Global card was included in the “PLN 400 with Millennium Visa Global and Millennium Visa Impresja credit cards” promotion.
- **New Savings Products** – in July, the “Your Goal” Savings Account was introduced, allowing clients to automatically set aside funds for selected goals (up to 10 simultaneously) with higher interest rates for regular savers. All withdrawals from savings goals are free of charge, and the product is available in both the mobile app and Millenet.
- **New Promotions for Savings Products** – in August, as part of the 70th edition of the promotion for new funds in the Profit Savings Account, the limit was increased to PLN 200,000.

The Bank continued its policy of delivering the highest quality service to Affluent clients – dedicated Prestige Experts are available both through traditional channels and fully remotely, supporting clients in everyday banking and key financial decisions while fostering long-term relationships. The superior quality of services was confirmed by the Forbes ranking “**Best Bank for Affluent Clients**”, in which the Bank received the top award.

In 2025, the Bank also launched educational initiatives in the form of webinars and podcasts, helping clients make informed financial decisions.

Segment Definitions:

- Prestige Clients: minimum PLN 200,000 in assets or/and PLN 20,000 in monthly inflows.
- Private Banking Clients: minimum PLN 1 million in assets deposited with the Bank.

At the end of 2025, the number of Affluent clients reached 194,7 thousand, representing a year-on-year increase of 21%. In the Private Banking segment, the number of clients as of December 2025 was 4,8 thousand.

Business Client segment

In accordance with Bank Millennium's new strategy „Strategy 2028 – Value & Growth” effective January 1, 2025, the definition of the Biznes Clients segment has been revised following the introduction of new segment: Small Business Clients.

Currently, the Biznes Clients offer is dedicated to sole traders and farmers whose total annual revenue does not exceed PLN 10 million.

In 4Q25, the Bank opened 10.6 thousand accounts for Biznes Clients, 6.3% increase compared to the 4Q of the previous year.

In 2025, the number of new accounts for Biznes Clients customers increase of 4.4% compared to 2024, reaching nearly 43,000 new accounts.

This growth was achieved thanks to the following initiatives, among others:

- implementation of cyclical special offers for clients opening accounts online and for new Biznes Clients
- introduction of new solutions enabling the identification of clients conducting business activity during the process of opening an individual account
- enhancement of the business account opening process in the mobile application and Millenet
- simplification of the process of establishing a relationship with sole traders and farmers in branch procedures
- acquisition campaign targeted at clients whose activity on individual accounts indicated business operations.

In 2025, 84% of company accounts were opened online.

The Bank offers a wide range of transactional, banking and credit products for Biznes clients, including an attractive “Millennium Księgowość”, payment terminals, leasing, the “Millennium PAY” payment gateway, “Currency Exchange”, as well as modern digital and mobile banking services. In 2025, Bank added a possibility to access to additional services for new sole traders' customers who established relation with Bank through PSD2 account opening process

In Q4 2025, the Bank adapted the “Millennium Księgowość” service to KSeF requirements by integrating systems to allow sending and receiving invoices from KSeF within “Millennium Księgowość.” Additionally, the Bank launched an educational campaign for sole traders and farmers, which included webinars discussing legal requirements related to KSeF implementation and demonstrating how to prepare for KSeF integration using the “Millennium Księgowość”.

Acquisition of business accounts was supported by strong promotional and advertising activities, including:

- Two flights of marketing campaign using high-reach media such as TV spots, radio spots, and online campaigns including social media activities. The main message focused on leveraging current promotions for the Mój Biznes CA to encourage customers to open an account online.
- Digital activities (including display banners, online video, Instagram Stories and TikTok reels) featured strong communication of the Mój Biznes CA promotion, complemented by creatives

promoting the Millennium Accounting service. A key element included banners advertising the possibility of online company opening with Bank Millennium.

- Non-standard marketing action “A Day in the life of an entrepreneur”, featuring strong presence of the Mój Biznes CA offer on Poland’s largest radio station RMF. In addition to radio spots, contests for entrepreneurs, and sponsorships, educational content was also aired. The campaign was complemented by online acquisition activities. A significant component was collaboration with podcasters aimed at promoting value added services and building BM’s image as the ideal bank for entrepreneurs. The campaign was rounded out by a DOOH initiative, where promotions for Mój Biznes CA were displayed on over 280 digital screens across Poland. Activities were carried out in cooperation with Visa.
- Collaboration with influencers, implemented regularly throughout the year. Influencers who genuinely run their own businesses encouraged opening a Mój Biznes CA and using value added services, referring to their personal experience as entrepreneurs.
- BTL materials, such as leaflets for clients with a detailed description of the Mój Biznes CA offer and VAS, and posters in branches.
- Additionally, the Mój Biznes CA offer along with additional services (e.g., accounting, leasing, or payment terminals) was promoted on digital signage screens in branches.

In 2025, the value of credit products sold to business customers increased by over 16% compared to 2024 and reached PLN 1,200 million, thanks to:

- further growth in the use of de minimis guarantees. In 2025, 95% of the value of loans was covered by de minimis guarantee from BGK.
- the introduction of the possibility to consolidate internal and external loans,
- the addition to the PA process of the possibility to apply for an overdraft facility, including digitally
- the introduction of a new mechanism for calculating offers for SOHO customers
- continuous improvements in the operation of the new risk engine

In 2025, 49% of all loan agreements were signed in Millenet or a mobile application.

Mobile and online banking

Bank Millennium consistently pursues a mobile-first approach, placing mobile banking at the centre of its activities. The banking app is one of the most important apps on our customers' phones. Already, 74% of customers log in to the Bank exclusively via the app. In 3Q, the Bank reached a milestone of 3 million active electronic banking customers.

In 2025, we improved everyday banking processes and added new orders to the app, new products and payment methods, and services at the intersection with e-commerce. We are where our customers are, and we develop digital channels based on their daily habits and expectations, building positive experiences in their contact with the Bank.

The Bank continues to develop its omnichannel customer service strategy, according to which the customer receives full support in the context and channel in which they find themselves. A consistent CX is possible thanks to the synergy between digital and traditional channels. We can achieve this with new tools such as a contact panel in the digital process, automated chat, and screen sharing with a consultant.

The year 2025 will also see intensive work on ensuring digital accessibility. Through audits, webinars, and the development of new service and design standards, the Bank is improving the accessibility of existing solutions and ensuring a high level of accessibility for new digital services.

Retail and business customers digital activity

	2025	2024	change
Active digital users	3 065 179	2 905 039	+6%
Active mobile users	2 871 141	2 653 201	+8%
BLIK payments users*	2 487 692	2 298 144	+8%

* Customer at least one used at least one BLIK service in 2025.

Everyday banking and digital transactions

The banking app is the centre of customer experience – intuitive, fast and secure. It is the first choice for customers in their everyday contact with the Bank. That is why we are digitising processes and facilitating remote transactions, while ensuring the security of our customers in digital channels. We have added a new orders hub, which we are expanding with new digital processes. We have made it possible to order cash in selected denominations to a branch or change personal details in the app. These activities are part of a larger orchestration project. Thanks to the fact that customers can perform basic activities themselves in digital banking, consultants have more time to deal with more complex customer requests.

In 2025, we moved the option of confirming identity using Millennium ID (a service based on mojID) to the mobile app. Until now, the service was available in the process of logging into Millenet, which could have created difficulties for customers for whom the mobile app is the primary channel of access.

As part of open banking, in 2025 customers gained the ability to download a list of transfer recipients from their account history at another bank in the application. Now, when they order a transfer at Bank Millennium, they do not have to re-type the details of recipients to whom they sent transfers from their account at another bank.

Products and services in digital channels

The Bank is developing its products and management capabilities in digital channels. In 2025, we added a new path for opening a current account in the app. During the process, customers confirm their identity in the mObywatel government app. We have also improved the video verification process (using selfie).

In 2025, we launched the savings account with saving goals (Konto Oszczędnościowe Twój Cel). The process of opening an account with a goal was embedded in the app, allowing customers to easily manage their goals, monitor their progress, and motivating them to save with a bonus for regularity. Customers can easily set up a standing order, name each of their saving goals, and choose the way on how to achieve them.

In 2025, the Bank also developed mortgage management options in the app, including the possibility of early repayment, changing the monthly instalment date, or applying for a repayment break.

We are developing bancassurance area. In November 2025, the application made it possible to purchase property insurance with the Bank's partner, Towarzystwo Ubezpieczeń Europa SA. There are plans to add insurance management options (e.g. reporting damage directly in mobile app) and to improve the processes of purchasing motor and travel insurance, which are already available in the app.

The Bank expands its value-added services (VAS) package. In 2025, together with its partner, Autopay SA, two projects were finalised – a new section of motorway in the automatic toll payment service (A2 Poznań-Konin) and the purchase of eSIM cards with internet packages for trips abroad. The latter solution was awarded the 2025 Innovation Diamond.

The Bank offers its customers a variety of solutions useful for travelling, including an in-app currency exchange and a multi-currency card service. Our currency exchange was shortlisted in the Banking Tech

Awards competition. In 2025, customers also gained the ability to manage payments outside the EU in the app. Customers can temporarily unblock these transactions themselves for a period of 1 day to 5 years. In 2025, the Bank also made new card management options available in the mobile app, including the credit card conversion process.

E-commerce payments, mobile wallets and BLIK

Bank Millennium integrates financial services with customers' digital lifestyle – we develop online and mobile payments, including BNPL and recurring payments as part of BLIK services. We want to be where our customers are and support them in their purchasing decisions. Already 80% of our customers shop online. In September 2025, the Bank reached a milestone of 2 million active customers with e-commerce transactions.

In 2025, nearly 2.5 million customers used BLIK services at least once, and in 2H 2025, the number of BLIK payments in e-commerce increased by as much as 22% y/y. At the beginning of April, app users gained access to BLIK Recurring Payments. This is a new payment method that allows BLIK to be used to pay for recurring obligations such as subscriptions, bills, utilities, travel fees and other recurring payments.

The Bank is developing mobile payments. New virtual wallets have been added to solutions such as Apple Pay, Google Pay, Garmin Pay and Fitbit Pay. Customers can make contactless payments using an even wider range of wearable devices, including watches from various brands, smart rings and key rings. This has been made possible by the implementation of new payment services in Q3: Samsung Pay, Xiaomi Pay, Zepp Pay (Amazfit), Swatch Pay, Fidesmo Pay, Digiseq Pay and Tappy Pay.

The Bank, together with Millennium Goodie, extended a cashback programme. In the middle of the year, customers gained access to a search engine in the app that allows them to find shops where they can receive cashback, and at the end of 2025, the service was extended to include cashback for payments in stationary shops.

Customer support

Bank Millennium builds a consistent customer experience regardless of the contact channel. Our strategy includes hybrid support models – quick contact with an expert via chat or phone call directly from the app, and a new service – sharing the app screen with a consultant (co-browsing). We have also started work on an AI assistant that will be a part of support ecosystem alongside traditional solutions.

We are adding new personalisation options, both in terms of communication and settings available in the banking app. In addition to the already available option of changing the background in the app, customers can now add their profile photo. In the area of communication, we develop video formats, building user-friendly content, with particular focus on new customer groups from Generation Z.

Cybersecurity

With increasing digitalisation, the security of our customers' data and transactions remains our top priority. We invest in technological solutions and educate users to ensure they have confidence in our digital services. In 2025, a new, transparent educational section was added to the app, which customers have already visited over 300,000 times (as of January 2026).

At the same time, further solutions automating customer protection have been implemented. In 4Q, we refreshed BLIK authorisation screens. Now, customers can see the address of the shop where they are paying or the address of the ATM from which they are withdrawing cash using the BLIK code. All this is to ensure a transparent and secure method of payment authorisation.

With security in mind, the Bank does not forget about customer convenience – in 2025, we introduced the options to: add a trusted browser, unblock a card yourself after it has been blocked by the Bank, and we enabled passive mode to the app after an account has been blocked for security reasons. Customers can log into the app and check their account balance, while their money is protected by transaction blocking.

Awards for digital channels

Bank Millennium's solutions are recognised in Polish and international rankings. The most important awards from last year:

- **Newsweek's Friendly Bank** – winner in the ranking, including fourth consecutive 1st place in the Remote Banking category
- **Institution of the Year** – awards in the categories: Best Remote Channel Service (1st place), Best Mobile Application (2nd place), Best Internet Banking (honourable mention)
- **Global Finance's Best Digital Bank** – once again, we won the title of the Best Digital Consumer bank in Poland and awards in 9 retail subcategories and 3 corporate subcategories
- **Euromoney's Awards for Excellence** – award for the best digital retail banking in Poland
- **Diamonds of Innovation** – award for Bank Millennium and Autopay SA for implementing the purchase of eSIM cards in the bank's application for the first time on the Polish market
- **Banking Tech Awards** – the in-app currency exchange service shortlisted in the Best Mobile Initiative for Customers category.
-

Brokerage business in the Bank Millennium Group

The Brokerage House of Bank Millennium ("The Brokerage House") provides a wide range of professional brokerage services for individual and corporate clients.

In 2025, the Brokerage House generated PLN 3.6 billion turnover on the equity market, which accounted for 0.4% market share according to the Warsaw Stock Exchange's data. In the Individual Clients sector, it was 1.3% share. On 31 December 2025 the Brokerage House provided services to 19 thousand investment accounts and acted as a market maker for 7 companies and as an issuer's market for 5 companies listed on the Warsaw Stock Exchange.

In 2025, the Brokerage House continued the placement of Millennium Bank Hipoteczny covered bonds. The total value of the two series of covered bonds offered was PLN 1.8 billion. The first issue took place in March 2025, reaching PLN 800 million, and was the last issue under the program covered by the prospectus approved by the Polish Financial Supervision Authority in 2024. The second series, worth PLN 1 billion, was offered under the Euro Medium Term Note program, based on the prospectus approved in Luxembourg. In both series, aggregate demand significantly exceeded the value of the instruments offered.

The Brokerage House, as a member of the distribution consortium, participated in the public offering of Diagnostyka S.A.

.

9.3 Corporate banking

In corporate banking, we focus on professional and comprehensive service for companies with annual revenues exceeding PLN 5 million, as well as public sector institutions.

We support clients in the implementation of projects that reduce the impact of business activity on the natural environment. We finance investments in renewable energy sources, innovative solutions that reduce the demand for energy and natural resources, and projects that improve waste management. At the same time, we support the development of our clients' business by offering financing for investments

that increase the scale of operations, improve operational efficiency and implement modern technologies. We provide access to solutions enabling expansion into new markets, infrastructure development and implementation of strategic projects, including financing of mergers and acquisitions. Our goal is to create conditions conducive to sustainable growth and competitiveness of enterprises, while taking into account aspects of sustainable development.

Our priority remains to assure the highest quality of service and the shortest possible time for reacting to customers' needs. To this end, we consistently automate the processes related to service, increasing their efficiency and reliability. At the same time, each client benefits from the care of a dedicated team of experts. The first line of contact is made up of Relationship Managers, who are supported by specialists in the areas of transactional banking, treasury products, trade finance, leasing, foreign exchange dealers and experts in the area of structured finance. In the field of digital solutions, including host-to-host integration, support is provided by a team of electronic banking experts. In operational matters, the service is provided by consultants and specialists in transactional systems. The team is complemented by experts from the EU Funds Competence Centre, who support clients in choosing appropriate forms of financing investments with the participation of public funds. The Relationship Managers and Experts service is complemented by well developed online and mobile banking solutions that cover daily needs and increasingly support the handling of more complex transactions.

The quality of service model is confirmed by the results of the annual survey of corporate banking customer satisfaction. In the third quarter, we conducted a survey in which 87% of respondents rated the support of Relationship Managers as very high (RMs' NPS: 78), and 90% expressed high satisfaction with the operational cooperation with Consultants. The NPS for the Corporate Banking line was 52 points. These results confirm our competence and commitment to providing the highest quality of service, and at the same time constitute an important source of feedback, setting the directions for further development of employee competencies, product offering and digital services.

Corporate banking performance

The year 2025 was a period of intensive acceleration in the growth of loan volumes compared to previous years. At the end of 2025, the volume of loans increased by PLN 2.9 billion, i.e. 20% y/y, reaching PLN 17.4 billion.

At the same time, in 2025 we recorded an almost twofold increase (85% y/y) in the volumes of newly disbursed loan products compared to 2024 – including a significant increase in sales of loans to small businesses at the level of 130% y/y. We achieved the highest growth dynamics in the key product areas:

- loans – growth by 135%,
- factoring – growth by 90%.

The volume of deposits increased by 13.9% y/y compared to 2024, reaching PLN 29.7 billion – with the volume of current accounts increasing by 17.1%.

Comprehensive product offering

We design financial solutions tailored to the specifics of our clients' business. We implement digital tools that support automation and increase the efficiency of financial processes, including limiting the scope of operational activities related to day-to-day banking services.

Credit products, including green finance

In 2025, we consistently developed our financing offer for enterprises, responding to the diverse needs of companies – from ongoing liquidity support, through development investments, to projects related to the energy transition. We have placed particular emphasis on solutions supporting sustainable development, including financing green investments and implementing tools to assess ESG risks. At the

same time, we conducted educational and information activities, helping clients better understand the available support instruments and prepare for the upcoming regulatory changes.

Financing with Bank Gospodarstwa Krajowego guarantee support – Investmax guarantee

In cooperation with Bank Gospodarstwa Krajowego we have provided customers with the new Investmax guarantee, which facilitates access to working capital and investment loans.

The guarantee is designed for entrepreneurs in the SME sector as well as micro-entrepreneurs. It secures up to 80% of the loan principal, up to PLN 6,906,400 in the case of SME support and up to PLN 172,660 in the case of microfinance.

The Investmax guarantee was created through the use of national funds and funds from the InvestEU Programme, in the form of a European Investment Fund (EIF) counter-guarantee. The InvestEU programme, through a budgetary guarantee, supports the European Union's policy objectives by facilitating access to financing innovation, business growth and job creation.

Loan for Development

We have expanded our offer for enterprises with the Loan for Development. The loan proceeds are transferred once to the company's account, with the possibility of using them for any purpose related to business activity.

The maximum amount of financing is PLN 4 million, and the repayment period can be spread over a maximum of 5 years. The loan may be secured by: a de minimis guarantee (up to 60% of the loan value) or a pledge on machinery or equipment, or a mortgage on real estate along with an assignment of rights under the insurance policy.

In addition, companies whose activities will be classified as green will not pay an origination fee on the loan granted.

Financing secured by a green guarantee of KUKE S.A.

We have made it possible to secure loans with a green guarantee from KUKE S.A. It facilitates clients' access to financing for investments that have a significant contribution to climate change mitigation, e.g. the development of renewable energy sources, improvement of energy efficiency, or the implementation of low-carbon technologies.

The guarantee may cover up to 80% of the value of the investment loan. The loan may be used both for the implementation of the investment and for the refinancing of costs incurred or repayment of loans taken for the implementation of this investment – provided that the investment has not yet been completed by the time the Guarantee is granted.

The minimum amount of financing is PLN 10 million (or the equivalent in a foreign currency). There is no maximum limit on the amount of the loan and guarantee.

Co-financing of energy audits

Thanks to the cooperation with the Employers of Poland, we have made available to clients from the SME, small mid-cap and mid-cap sectors the opportunity to obtain co-financing for up to 90% of the costs incurred in connection with the development of documentation and analyses in the field of energy efficiency needed to prepare the investment.

The Project of the Employers of Poland under the name "Energy of the Employers of the Republic of Poland" is implemented under the ELENA program with the support of the European Investment Bank.

New factoring system

We have made available to our customers a new factoring system Millenet Faktor, integrated with Millenet for Corporate online banking. A clear and intuitive interface ensures speed and convenience of using the system. The extended scope of data gives access to detailed information about each

transaction, which significantly facilitates the analysis and management of factoring processes for customers. The graphical way of presenting the information is user-friendly and allows for a quick overview of the current state of financing and effective management of available funds.

Transactional and electronic banking

We continued to develop our electronic banking systems, focusing on convenience, intuitiveness and security of service for business customers. Our goal is to provide solutions that really support the day-to-day operations of enterprises – regardless of their scale and industry. We actively involve customers in the design of new functionalities, inviting them to participate in research, tests and consultations. Thanks to this, the implemented solutions respond to the real needs of users and are adapted to the dynamically changing business environment. We place particular emphasis on effective on-boarding – a simplified process of implementing and activating services that allows companies to quickly start using the full capabilities of our platform.

Multicurrency function of the VISA Executive debit card

We have introduced a multicurrency function to the VISA Executive debit card. It allows customers to make payments directly from foreign currency accounts, without the need to convert currency. Companies can assign to one card one account maintained in each of the 14 currencies offered by us. A transaction will be automatically settled from the account linked to the card in the transaction currency.

Direct debit with new auto-retry feature

Since September, our customers can use the automatic renewal of direct debits function.

If a transaction is rejected due to lack of funds, the system retries to debit the account for a customer-defined number of days, which increases the efficiency of collections and reduces the need for manual intervention.

Housing Escrow Account

We have made the offer of residential escrow accounts more attractive by introducing a number of facilitations for customers. Verification of expenses is now carried out on the basis of the funds actually paid from the open housing escrow account, and not on the declaration from the schedule. The inter-tranche withdrawal machine works for up to 30 days, which is a unique solution on the market. Customers also do not have to provide proof of payment of invoices if the investment is settled through an account in our bank. In addition, we have simplified processes and are processing standard payment requests even faster.

New functionalities of the Millennium for Corporate mobile app

We develop our application taking into account the needs of companies of various size: small, medium-sized as well as corporations and public administration units.

In the application for enterprises, we have introduced the Currency Exchange service for small businesses. With this feature, users can execute transactions to buy and sell currencies at attractive rates.

We have also launched a payment card service mode. All card users can conveniently manage them on their smartphones, even if they do not have access to Millenet for Corporate. All they have to do is download the Bank Millennium for Corporate application and activate it in the I only have a card mode.

We have also implemented a functionality supporting recreation of a transfer based on previously executed outgoing payments. The solution allows users to quickly create a new payment order directly from the transaction history. The details of the new transaction (beneficiary, payment title and amount) are automatically pre-filled based on the selected previous transfer, with data confirmation or modification option for the user. The functionality is available for all types of outgoing transfers and is intended to simplify the payment execution process as well as reduce the risk of operational errors.

In addition, we have made available a high-contrast feature, making it easier to use the app by the visually impaired, and we have made a number of improvements to the view of the history of operations and the notifications received by users

New functionalities of Millenet for Corporate

Qualified seal

We have implemented a qualified electronic seal for the documents we provide to customers in Millenet for Corporate. On the recipient side, the correct validation of the seal can be carried out both in Adobe Acrobat Reader and in external validators provided by trusted third parties.

Transaction limits for users in Millenet for Corporate

We have provided the ability to define individual transaction limits for each user on the client's side, which increases the ability to control and secure funds in the company.

LEI Code

In Millenet for Corporate and in the mobile application, we have added a field on the foreign transfer preparation screens that allows you to enter the LEI (Legal Entity Identifier), which speeds up payment processing thanks to the unambiguous identification of the payee.

ESG Questionnaire in Millenet for Corporate

We have provided customers with a digital ESG questionnaire, available to be conveniently filled-out in Millenet for Corporate. The questionnaire collects data according to a standard in accordance with the guidelines of the EBA – European Banking Authority. We use the analysis of this information to assess whether the client's operations and the investment are sustainable, as well as to analyse the client's exposure to ESG risks - environmental, social and governance.

New Millenet Link Lite service

We have launched the Millenet Link Lite service, which enables the automation of payment processing thanks to the integration of clients' financial and accounting systems with our transactional system based on the use of the client's cloud. The solution does not require the company to install any additional software, the client configures the service in Millenet for Corporate electronic banking, and exchange of data on payments is done online.

Digitalisation of customer service processes

Business customers are increasingly willing to use digital service channels, choosing solutions that provide speed, convenience and full availability of services regardless of place and time. Data from the last quarter confirm the growing popularity of electronic forms of contact, submission of applications and transaction execution:

In the fourth quarter of 2025, the percentage of credit agreements signed electronically increased to 78%; 93% of the guarantees were issued in the form of e-guarantees, 93.98% of applications for subsequent bank accounts and 85.2% of applications for payment cards were submitted in digital form.

The option to conclude transactions in the Millennium Forex Trader electronic online currency exchange platform has been enjoying greater and greater interest among clients. Already 75.6% of transactions were carried out in Q4 2025 via online banking and the mobile application.

The share of customers using Millennium Leasing's electronic customer service is consistently growing – at the end of December 2025 it was already 97% of leasing customers. Electronic applications for handling contracts and leased items in December 2025 accounted for almost 67% of all leasing applications submitted by clients.

The number of documents processed in the Documents Module in Millenet for Corporate increased by 32% compared to 2024. This is another year of such dynamic growth. The Documents Module enables a two-sided, secure and convenient exchange of documents between us and the client via an online transactional service.

The number of all documents related to the maintenance of bank accounts processed electronically exceeded 60%.

Global Finance awards

In this year's edition of the World's Best Digital Banks competition, Global Finance recognized our digital offer for enterprises and public institutions for the quality, consistency and effectiveness of solutions – in Poland and the entire CEE region.

In 2025, in the corporate area, we won in 3 categories of the competition:

- Best Integrated Corporate Banking Program in Central and Eastern Europe 2025,
- Best Trade Finance Services in Poland 2025,
- Best Integrated Corporate Banking Program in Poland 2025.

We support clients through educational and networking activities

We undertake a number of activities that enable us to expand the knowledge of our clients, support attainment of the challenges facing us and build a community of entrepreneurs. We carry out our activities independently and together with our partners, in particular business organisations.

Our experts provide clients with up-to-date and reliable knowledge about the economy, new solutions that may have an impact on financial management. We regularly provide up-to-date macroeconomic data and prepare a summary and analysis of key events from the domestic and foreign markets every week.

We constantly conduct educational activities in the area of IT security and the risk of fraud. We inform about available support programmes, as well as provide knowledge and conduct training in the area of green transformation, as well as, among others, in the form of webinars, podcasts with internal and external experts, and also presentations of our specialists during conferences and meetings in which we participate as partners.

We cooperate with the CFO Club of ICAN Institute

The CFO Club is a development and networking initiative bringing together CFOs, chief accountants, and members of the management boards responsible for finance.

It provides access to up-to-date knowledge and is a platform for the exchange of experiences. Club members participate in meetings and webinars, and also receive access to numerous podcasts and articles. The substantive scope of these initiatives includes key challenges for CFOs: financing the development of companies (including using banking solutions and public financing), liquidity management, hedging business risks, green transformation and ESG, preparation for planned legal and tax changes, as well as the role of technology in the digital transformation of financial departments and the evolution of CFO competencies.

We are a partner of the Forbes Family Business Forum

In the 8th edition of the Forbes Family Business Forum – a joint initiative of Forbes magazine and Bank Millennium - 9 meetings were held with entrepreneurs in Poland's biggest cities.

In the presentations and discussion panels accompanying the meetings, we discussed the topics of innovation, investment financing, business resilience and preparation of companies for the changing economic environment.

Custodial services

Bank Millennium provides custodial services based on an individual license granted by the Securities and Exchange Commission (currently the Polish Financial Supervision Authority). The Bank is a direct participant in securities depository and settlement systems such as the National Depository for Securities (kdpw_stream), the NBP Securities Register (RPW), Euroclear Bank SA/NV (Brussels), and Clearstream Banking Luxembourg (Luxembourg).

The clients of the Custody Department include domestic and foreign financial institutions (global custodians, depository banks, investment banks, asset management companies, insurance firms, collective investment institutions, investment funds), as well as other legal entities actively participating in capital and money market operations that require comprehensive and tailored services, as well as advanced information technology and infrastructural solutions.

In terms of the number of domestic and foreign clients entrusting their assets to us, the Bank holds one of the leading positions in Poland. The value of assets held in clients' securities accounts as of 31 December 2025 amounted to PLN 27 billion. At the same time, at the end of 2025, the Bank maintained 12,130 securities accounts and foreign financial instrument accounts. In 2025, the Bank also acted as an Issuing Agent and Depository for 21 Investment Funds.

International operations and external financing

During last year the Bank continued projects connected with long-term process of strengthening the base of credible counterparties and partners on the interbank market, including, in particular, in the segment of instruments involving medium and long-term liquidity management in FX. One of the important aspects of the activities in the area was managing the portfolio of agreements with domestic and foreign banks (including ISDA, GMRA and CDEA types) whose form requires regular adjustment to a changing regulatory environment and market standards. A considerable part of the activity was also connected with broadly defined compliance issues (including growing demands in the KYC/AML and sanctions area), as well as with, planned for the subsequent year, issue of debt instruments of capital nature.

Irrespective of the above activities, in the past period the Bank performed, on an on-going basis, all other tasks connected with the overall carrying out of international operations, in areas of implementing various objectives including, inter alia, processing payments and settlements, current financing of own needs and those of the Bank's clients, trade finance services, participating in international money and FX market transactions, operating on the capital market. The achievement of these objectives was supported, to a large extent, by an over thirty-year long process of developing the Bank's cooperation with its foreign partners and counterparties. The Bank maintains ongoing contacts and relations with selected reputable correspondent banks and their units located in all countries of significance from the perspective of the structure of turnover of Polish foreign trade and non-trade transactions.

No new transactions related to the issuance of debt in the international market were concluded in 2025 (including in the form of bonds or bilateral loan agreements).

9.4 Subsidiaries' activity

Millennium Goodie

In 2024, the goodie cashback service continued its upward trend. The number of users actively using the service increased by 35% y/y. The number of transactions made in this period increased by almost 50% y/y.

Numerous promotions were carried out to encourage users to use the service frequently and to attract new users. Promotional activities also included the popularisation of the cashback plugin, as well as increasing the number of promotional leaflets viewed.

A number of activities were carried out to test new communication channels through which new users could be acquired. In addition, in 4Q24, an intensive video campaign was carried out on the most popular platforms.

There were also significant increases in the "Moneyback for purchases" service available in the Bank Millennium application and website – both among new users and in the number of transactions made through the service.

In terms of the number of gift cards sold, an increase of 20% y/y was achieved.

Millennium Leasing

Millennium Leasing sp. z o.o., a subsidiary of Bank Millennium, was established in 1991 and is one of the longest operating leasing companies on the Polish market. Its activities cover the financing of all types of fixed assets: cars and vans, machinery and equipment for most industries, heavy transport (including: road, rail and water), as well as real estate.

In 2025, the value of leasing agreements initiated by Millennium Leasing amounted to a total of PLN 3.9 billion, which is 0.9% lower than in 2024. As of 31 December 2025, the value of capital involved in active leasing agreements amounted to PLN 7.2 billion, i.e. 3.8% above the level at the end of 2024.

In 2025, Millennium Leasing continued to offer leasing with a de minimis guarantee from BGK bank. In 2025, BGK granted the company the ability to cover a new pool of leasing contracts with de minimis guarantees, amounting to a record PLN 1,197 billion. The Company is the market leader in executing agreements with de minimis guarantees from BGK, with over a 60% market share at the end of 2025, considering the number of signed agreements with the de minimis guarantee from BGK. In 2025, 1379 contracts were signed with a total net value of PLN 297 million.

Millennium Leasing actively developed its "green" leasing products launched in April 2023. Thanks to this offer, entrepreneurs can finance green assets comprehensively and under preferential conditions. The offer includes a wide selection of assets from 57 groups, the most important of which are photovoltaic installations, rolling stock and low-emission vehicles. In 2025, the Company activated leasing contracts for sustainable assets with a total net value of PLN 117.5 million.

In 2025, Millennium Leasing participated in the government NaszEauto electromobility support programme implemented by the National Fund for Environmental Protection and Water Management (NFOŚiGW). As part of this programme, the Company financed 48 electric vehicles with a total value of PLN 7.9 million, thus contributing to reducing greenhouse gas emissions and improving the efficiency of its vehicle fleet. In 2025, the Company handled lease agreements as part of the previous Mój Elektryk electromobility support programme, which it had implemented since 2022 – these are 163 agreements in total, with a value of PLN 28.9 million.

During the period, the company promoted its Benefit Packages in the MilleFlota programme. Clients can benefit from fleet management services/tools and attractive discounts on parts and services for vehicles (up to 3.5 tons). In 2025, 1,422 Benefit Packages were sold.

In June 2025, the Company launched the second edition of the "Free Registration" promotion, in which customers accepting leasing offers based on a fixed interest rate for specific asset groups could register their vehicle for free. The promotion covered 3229 leasing agreements in 2025.

Since the beginning of 2025, the Company has actively promoted its annual and multiannual insurance offers. In 2025, the Company recorded an 9.6% increase in car insurance production compared to the previous year and a 10.3% increase in multiannual insurance production.

The Company continued the process of digitization of its services, actively promoting the electronic handling of leasing contracts via the Electronic Customer Service Centre (elektroniczne Biuro Obsługi Klienta, eBOK) on the Millenet platform. At the end of 2025, 97% of clients used eBOK. The website has been expanded to include the possibility of submitting applications, thanks to which the client can order all standard matters regarding contracts and leased items online. In December 2024, nearly 67% of such applications were submitted electronically, using the eBOK platform. Millennium Leasing is also implementing additional features and improvements, making eBOK a convenient platform for comprehensive operational cooperation with clients.

The Company continued promoting e-Signature, enabling remote signing of leasing contracts with the use of qualified electronic signatures. In 2025, a significant increase in the share of agreements concluded electronically was recorded in the corporate customer segment, from the level of 53% in 2024 to 68.3% in 2025, which unanimously confirms the progressive digitisation of sales processes.

At the same time, the Company continued its programme addressed to sole entrepreneurs, allowing them to sign leasing agreements remotely using a free qualified electronic signature provided as part of the Autenti platform. Current data indicate a continuing upward trend as regards the number and share of agreements concluded in this manner.

Moreover, in connection with the entry into force, in July 2025, of a deregulation act amending, among others, the provisions of the Civil Code with respect to the conclusion of leasing agreements in documentary form, the Company implemented an additional channel on the Autenti platform that allows to conclude agreements in this form. The implementation of this solution contributed to further optimisation of processes, reduced circulation of paper documents and increased operational efficiency, while ensuring compliance with applicable legal regulations.

Millennium Leasing services are sold by leasing advisors in 58 locations throughout Poland. Moreover, the Company actively cooperates with banking advisors in retail branches and in the corporate banking service network of Bank Millennium. This allows the Company to offer entrepreneurs a full range of financial services, including both leasing and banking products.

Millennium TFI investment funds

Millennium TFI S.A. is a licensed financial institution operating since 2001 as an entity engaged in the creation and management of investment funds. At the end of 2025, the Company managed client assets amounting to PLN 11 billion. The number of Millennium fund participants exceeded 210,000 at the end of 2025.

The primary objective of Millennium TFI's business activity is to provide clients with attractive and effective investment solutions, along with professional service. The portfolio managers are professionals with many years of experience and excellent knowledge of financial markets.

In 2025, the Company recorded an increase in assets of PLN 3.43 billion, i.e. 45.05% compared to the assets of the funds under management at the end of 2024. This was driven both by strong net sales of PLN 2.65 billion and by the increase in the value of financial instruments (the so-called *price effect*), which amounted to PLN 0.78 billion for the full year. All managed sub-funds generated positive rates of return despite numerous geopolitical turbulences and ongoing armed conflicts.

In 2025, major central banks continued the process of monetary easing. In the United States, the FOMC cut the federal funds rate by a total of 75 bp (from 4.25–4.50% to 3.50–3.75%), while the ECB Governing Council decided to reduce the cost of money by a total of 100 bp (the deposit rate was lowered from 3.00% to 2.00%). Government bond yields in core markets moved in opposite directions in 2026. The yield on the 10-year U.S. benchmark declined from 4.57% to 4.17%, while the yield on the 10-year German benchmark increased from 2.36% to 2.85%, mainly due to the ECB's shift to a more restrictive

stance and concerns about potential fiscal loosening in Europe related to the need to increase defence spending. The positive investor sentiment supported the tightening of credit spreads on corporate bonds and emerging-market debt.

In Poland, the Monetary Policy Council initiated a monetary easing cycle, cutting the reference rate by a total of 175 bp (from 5.75% to 4.00%), encouraged by a faster-than-expected decline in inflation towards the NBP target. This led to falling yields across the entire local yield curve and supported the performance of fixed-income funds.

Global equity markets ended 2025 with another year of double-digit gains. Equity price increases were driven primarily by the earnings and growth of companies in the artificial intelligence sector, the strength of the U.S. economy, and the dovish monetary stance of key central banks. Almost all markets advanced, with the MSCI ACWI global equity index returning 19.71%.

In 2025, the Polish equity market was among the strongest globally, supported by improving sentiment towards the Warsaw Stock Exchange. Foreign investors renewed their interest in Polish equities, driven among other factors by hopes for an end to the war in Ukraine and a weakening U.S. dollar. The broad-market WIG index rose by approximately 47%. Among sectors, the mining sector stood out positively, benefiting from rising copper and silver prices.

In summary, the behaviour of capital markets in 2025, both in Poland and globally, not only supported the growth in the value of assets under management but also contributed to a dynamic increase in fund unit purchases, particularly within fixed-income strategies and among affluent clients.

Millennium TFI S.A. currently manages three umbrella funds: an Open-End Investment Fund with six subfunds investing in the Polish market (Millennium FIO), a Specialised Open-End Investment Fund with six subfunds investing in global markets (Millennium SFIO), and Millennium PPK, a Specialised Investment Fund with nine target-date subfunds. In 2025, the Company therefore offered participation units of 21 investment subfunds within its open-end fund range, enabling clients to invest across strategies with various risk profiles.

The Company's broad offering also includes a range of savings products built on the investment funds it manages. The most popular among clients are retirement products, including the Employee Capital Plans (PPK) and Individual Retirement Accounts (IKE). Millennium TFI currently manages IKE programmes for 24 thousand clients, with total assets amounting to PLN 475 million. As at the end of 2025, total assets invested in PPK funds, operated for more than 32 thousand participants, amounted to PLN 324 million.

Millennium Bank Hipoteczny

Millennium Mortgage Bank S.A. ("MBH") - a full subsidiary of Bank Millennium S.A. - is operating since 2021 with the main goal to provide the Group with stable and long-term financing of mortgage loans in the form of covered bonds secured by mortgage receivables.

Following the inaugural issue of covered bonds in June 2024, MBH continued this activity and at the end of 2025 the total outstanding amount of issued mortgage covered bonds reached PLN2.6 billion. This amount comprises 3 issues made under Polish programme (base prospectus approved by PFSA) and the last PLN1 billion issue made under international (EMTN) programme (base prospectus approved by CSSF in Luxembourg in September 2025).

All four issued series of covered bonds have been admitted and are listed on the domestic regulated market operated by the WSE and additionally, the first series of covered bonds under international (EMTN) programme is listed on the Luxembourg Stock Exchange. MBH's covered bonds have the rating of AAA/negative outlook obtained by Fitch Ratings.

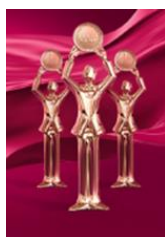
MBH's covered bonds are secured by mortgage receivables under loans granted by the Bank. Since the beginning of MBH operations there have been ten transfers of mortgage loans carried out. As at the

end of 2025 year total loans portfolio of MBH reached PLN4.6 billion, of which PLN3.8 billion are already written into cover pool register. MBH is constantly working on next loans pools for further transfers. These works primarily include determining the mortgage lending value of real estate ("MLV"). All loans scheduled for transfer meet several specific criteria, the most important of which are:

- loan currency in PLN
- earmarked for housing purposes
- ownership title with established mortgage in favour of Bank Millennium in the 1st place
- no evidence of impairment
- loan value lower than the mortgage lending value (MLV).

Thanks to these criteria and strict monitoring of mortgage loans portfolio, its quality remains very strong. Also, MBH's solvency and liquidity ratios are being maintained at very high, safe levels.

10. Main awards and achievements in 2025



Bank Millennium is the Golden Bank of 2025

Bank Millennium won the Golden Banker 2025 ranking, winning the Golden Bank 2025 title for the best multi-channel service quality. For the fifth time, the Bank took first place for the highest quality of service on the hotline, and for the third time in a row stood on the podium for the highest quality of service in chat and e-mail.



Bank Millennium is the best bank in Poland for the third year in a row

Bank Millennium again wins "Newsweek's Friendly Bank" ranking. For the third year in a row, it won the double crown, winning in both ranking categories – "Traditional Banking" and "Remote Banking". "Newsweek's Friendly Bank" is a ranking assessing the friendliness and quality of customer service in the largest banks in Poland, based on the mystery shopper method.



First place in the Forbes "Best Bank for Affluents" ranking

Bank Millennium turned out to be the best in the Forbes "Bank for the Wealthy" ranking. In the ranking presented for the second time, it obtained 94.89% of the possible points.



Second place in the Forbes Company-Friendly Bank ranking

In the Forbes *Company-Friendly Bank* ranking, Bank Millennium moved up to second place compared to last year. *Company-Friendly Bank* is a ranking evaluating the quality of business customer service, prepared on the basis of the mystery shopper method.



Bank Millennium is one of the best employers in Poland

Bank Millennium received the title of Top Employer Polska 2025. This prestigious award, won for the second year in a row, confirms the Bank's commitment to creating even better working environment by implementing high standards in the field of human resources management and HR practices.



Bank Millennium is the best Digital Bank by Global Finance magazine

The Bank was awarded the title of Best Bank in Poland for 2025. The annual Global Finance Awards honour financial institutions that prioritize customer needs, stand out for the breadth of their offerings, long-term stability, and technological innovation.



Award for the Best Mobile Banking Application for SMEs

The Bank received the award for Best Mobile Banking Application for SMEs in the Global Retail Banking Innovation Awards 2024 ranking. The competition is organized by the international financial magazine The Digital Banker, which focuses primarily on banking and economic issues.



Euromoney Award

Bank Millennium has been recognized as Poland's Best Digital Bank by Euromoney. The Bank received the title of Poland's Best Digital Bank for Consumers in the magazine's prestigious Awards for Excellence competition.



Innovation Diamond for the AutoPay Project

Bank Millennium has been awarded the Innovation Diamond in the category "Innovation of the Year: Finance and Banking" for introducing the option to purchase eSIM cards with an international data package directly through its mobile application.



Customer Service Quality Star 2025

For the twelfth time, Bank Millennium was among the companies honoured with the Customer Service Quality Star title. The distinction is awarded based on an in-depth consumer satisfaction survey to institutions that represent the highest standards of service. The Polish Customer Service Quality Program has been monitoring the satisfaction levels of Polish consumers for 18 years.



Customer Relations Star

The Bank was ranked second in the Customer Relations Star category in a prestigious competition held by Dziennik Gazeta Prawna. This year, 12 institutions participated in the competition. It was the 11th edition of the ranking, in which the jury evaluated the activities of commercial banks operating in Poland.



Bank Millennium once again awarded the Solid Employer 2025 title

Bank Millennium has once again received the prestigious Solid Employer of the year distinction in the nationwide category. This recognition confirms that the Bank consistently creates a work environment based on trust, collaboration and care for people.



Bank Millennium on the ESG Ranking podium

Bank Millennium secured 2nd place in the 'ESG Ranking: Responsible Management 2025' in the Governance category, which evaluates ethical business practices. This marks an advancement from last year's 3rd place and further strengthens the Bank's position as one of the market leaders in this area.

11. Risk management

11.1 Risk management overview

The mission of risk management in the Bank Millennium Group is to ensure that all types of risks are managed, monitored, and controlled as required for the risk profile (risk appetite), nature, and scale of the Group's operations. Important principle of risk management is the optimization of the risk and profitability trade-off – the Group pays special attention to ensure that its business decisions balance risk and profitability adequately.

The goals of the risk management mission are achieved through implementation of the following actions:

- Development of risk management strategies, credit policy, processes, and procedures defining the principles for acceptance of the allowable level of particular types of risk,
- Increasingly wider implementation of the IT tools for risks identification, control, and measurement,
- Increasing awareness of employees as regards their responsibility for proper risk management at every level of the Group's organizational structure.

Risk management is centralized for the Group and considers the need to obtain the assumed profitability and to maintain proper risk-capital relationship, in the context of having proper level of capital to cover the risk. Within risk management system, a broad range of methods is used, both qualitative and quantitative, including advanced mathematical and statistical tools supported by adequate IT systems.

When defining the business and profitability targets, the Group considers the specified risk framework (risk appetite) to ensure that business structure and growth will respect the risk profile that is targeted and that will be reflected in several indicators such as:

- Loan growth in specific products / segments
- Structure of the loan portfolio
- Asset quality indicators
- Cost of risk
- Capital requirements / Economic capital
- Amount and structure of liquidity needed.

The risk management and control model at the Group's level is based on the following main principles:

- ensuring the full-scope quantification and parameterization of diverse types of risks in the perspective of optimizing balance sheet and off-balance sheet items to the assumed level of profitability of business activity. The primary areas of analysis encompass credit risk, market risk, liquidity risk, and operational risk; legal, compliance and litigation risks also are subject to specific attention;
- all types of risks are monitored and controlled in reference to the profitability of operations and the level of capital necessary to ensure the safety of operations from the point of view of capital adequacy. The results of risk measuring are regularly reported as part of the management information system;
- the segregation of duties between risk origination, risk management, and risk control.

The Risk management process of the Group is presented in the below diagram:



The split of competence in the field of risk management is as follows:

- The Supervisory Board is responsible for overseeing the compliance of the Group's risk-taking policy with the Group's strategy and its financial plan. Within the Supervisory Board acts the Committee for Risk Matters, which supports it in realization of those tasks, among others, issuing opinion on the Group's Risk Strategy, including the Group's Risk Tolerance;
- The Management Board is responsible for the effectiveness of the risk management system, internal capital estimation process, for reviewing the internal capital calculation and maintenance process and the internal control systems;
- The Credit Committee, the Capital, Assets and Liabilities Committee, and the Liabilities at Risk Committee are responsible for current management of different areas of banking risk, within the framework determined by the Management Board;
- The Risk Committee and the Processes and Operational Risk Committee are responsible for defining the policy and for monitoring and control of different areas of banking risk, within the framework determined by the Management Board
Within the Risk Committee, the Liquidity Crisis Subcommittee operates — responsible for coordinating actions in the event of an extraordinary situation in the Bank, namely the occurrence of a liquidity crisis. The Subcommittee is responsible for activating and coordinating emergency and communication procedures under the Liquidity Contingency Plan at Bank Millennium S.A.

Within the Processes and Operational Risk Committee, the following bodies operate:

- ICT Security Subcommittee (Information and Communication Technologies) – responsible for conducting specialized oversight of the Bank's information security management system, ensuring effective supervision over the implementation of continuous improvements in IT security, as well as ongoing monitoring of the ICT environment's security, focused on ensuring timely implementation of effective control mechanisms and reporting completed tasks to the Committee,
- Data Process Management Subcommittee – responsible for overseeing data process management in the Bank (Data Governance),
- Subcommittee for Management in the Planning and Execution of Resolution and Orderly Liquidation – responsible for coordinating the planning and execution of mandatory resolution and orderly liquidation.
- The Product Committee reviews proposals for the implementation and withdrawal of products and services from the bank's offering;
- IT Steering Committee – responsible for ensuring the alignment of the IT strategy with the Bank's overall strategy, including its business objectives, and for consistently achieving, through IT deliverables, the appropriate levels across all dimensions of information technology;

- The AML Committee is responsible for supervision of anti-money laundering and terrorism financing in the Bank and cooperation in combating financial crime;
- The Validation Committee is responsible for confirmation of risk models' validation results and follow-up in the implementation of the measures defined by the Models Validation Office;
- The Sustainability Committee is responsible for making key decisions regarding sustainable development in the Bank Millennium S.A. Group, in relation to environmental, social and governance factors.
- The Sub-Committee for Court Cases is responsible for expressing opinions and taking decisions in matters regarding court proceedings, for the cases when value of the dispute or direct effect for assets value as a consequence of court verdict exceeds PLN1mn or as result of multiple cases with the same nature, excluding most of the cases belonging to the restructuring and recovery portfolio of Bank's receivables managed by the Corporate Recovery Department and Retail Restructuring and Debt Collection Department. The Sub-Committee for Court Cases is also competent for disputes in the portfolio of the Retail Restructuring and Debt Collection Department, which the nature of the dispute corresponds to the nature of court disputes supervised by the Court Cases Risk Sub-committee referred to in the first sentence above and matters relating to the determination of terms of settlement as to the effects of legal relationships at the pre-trial stage or in circumstances indicating a significant likelihood of litigation (such as in the process of FX mortgage negotiations and amicable settlements with borrowers), and if materialized, would fall within the competence of the Court Cases Risk Sub-committee, excluding cases managed by Corporate Recovery Department;
- The Risk Department is responsible for risk management, including identifying, measuring, analysing, monitoring, and reporting on risk within the Bank. The Risk Department also prepares risk management policies and procedures as well as provides information and proposes courses of action necessary for the Capital, Assets and Liabilities Committee, Risk Committee, and the Management Board to make decisions with respect to risk management;
- The Rating Department is responsible for risk rating assignment for Corporate clients (based on the evaluation of clients' creditworthiness) as well as for rating monitoring and potential revision during the period of its validity. Rating assignment process is independent from credit decision process;
- The Corporate Credit Underwriting Department, Mortgage Credit Underwriting Department and Consumer Finance Credit Underwriting Department have responsibility, within the Corporate Customer segment and Retail Customer segment, respectively, for the credit decision process, including analysing customers' financial situation, preparing credit proposals for the decision-making levels, and making credit decisions within specified limits;
- The Retail Liabilities Monitoring and Collection Department and Retail Liabilities Restructuring and Recovery Department have responsibility for monitoring repayment of overdue debts by retail customers and their collection;
- The Corporate Recovery Department develops specific strategies with respect to each debtor from recovery portfolio, which aims to maximize timely collection of the outstanding debt and minimize the risk incurred by the Group. This approach is constantly revised to reflect updated information, and the best practices and experiences regarding collection of overdue debts;
- The Consumer Dispute Resolution Department – which supports and enhances the activities of those Bank areas for which there is a high likelihood of entering into disputes with clients, potentially resulting in financial consequences and reputational risk for the Bank.
- The Treasury Control and Analyses Office has responsibility for monitoring the use of part of the Group's limits, including counterparty and stop-loss limits, the Group's FX position, results of active trading and control of operations of the treasury segment;
- The Models Validation Office has responsibility for qualitative and quantitative models' analysis and validation, independent from the function of models' development; development of the models' validation and monitoring tools; activities connected with issuing opinions on the

adequacy of the models for the segment, for which they were developed; preparing reports for the Validation Committee needs;

- The purpose of the Sustainability Department is to supervise and coordinate the process of implementing the principles of sustainable development in the Bank and the Group;
- The Anti-fraud Sub-unit has responsibility for implementation and monitoring Bank policy execution in the scope of fraud risk management in cooperation with others Bank units. The Sub-unit constitutes a competence centre for anti-fraud process;
- The Compliance Department has the responsibility to ensure compliance with legal regulations, related regulatory standards, market principles and standards as well as internal organization regulations and codes of conduct, and in anti-money laundering process;
- The Legal Department has responsibility for handling the litigation cases of the Bank, with support of external legal offices and legal experts whenever necessary.

The Group has prepared a comprehensive guideline document for the risk management policy/strategy: "Risk Strategy for 2026-2029". The document takes a 4-year perspective is reviewed and updated annually. It is approved by the Bank's Management Board and Supervisory Board. The risk strategy is inextricably linked to other strategic documents, such as: Budget, Liquidity Plan, and Capital Plan.

The Risk Strategy bases on the two concepts defined by the Group:

1. Risk profile – current risk level expressed in amount or type of risk the Group is currently exposed. The Group also has a forward-looking view how their risk profile may change under both expected and stress economic scenarios in accordance with risk appetite,
2. Risk appetite – the maximum amount or type of risk the Group is prepared to accept and tolerate to achieve its financial and strategic objective. Three zones are defined in accordance with warning / action required level.

Risk strategy is one of the crucial features that determine the risk profile of the Bank/Group.

Risk appetite must ensure that business structure and growth will respect the forward risk profile. Risk appetite was reflected through defined indicators in several key areas, such as:

- Solvency
- Liquidity and funding
- Earnings volatility and Business mix
- Franchise and reputation.

The Bank and The Group have a clear risk strategy, covering retail credit, corporate credit, markets activity and liquidity, operational and capital management. For each risk type and overall, the Group clearly defines the risk appetite.

The Risk Management is mainly defined through the principles and targets defined in Risk Strategy and complemented in more detail by the principles and qualitative guidelines defined in the following documents:

- a. Capital Management and Planning Framework
- b. Risk management and control principles
- c. Credit Principles and Guidelines
- d. Rules on Concentration Risk Management
- e. Principles and Rules for Liquidity Risk Management
- f. Principles and Rules on Market Risk Management for Financial Markets Activity
- g. Principles and Rules for Market Risk Management in Banking Book
- h. Investment Policy
- i. Principles and Guidelines for Management of Operational Risk
- j. Policy, Rules, and Principles of the Model Risk Management
- k. Stress tests policy

- I. Sustainability Policy
- m. Regulations of Bank Millennium S.A. - Program of counteracting Anti-Money Laundering and financing terrorism.

Within risk appetite, the Group has defined tolerance zones for its measures (build up based on the “traffic lights” principle). As for all tolerance zones for risk appetite, it has been set:

- Risk appetite status – green zone means a measure within risk appetite, yellow zone means an increased risk of risk appetite breach, red zone means risk appetite breach
- Escalation process of actions/decisions taken - bodies/organizational entities responsible for decisions and actions in a particular zone
- Risk appetite monitoring process.

The Group pays particular emphasis on continuous improvement of the risk management process. One tangible result of this is approval to use the IRB approach more broadly in the process of calculating capital requirements.

11.2 Capital management

Capital management and planning

Capital management relates to two areas: capital adequacy management and capital allocation. For both areas, management goals were set.

The goal of capital adequacy management is: (a) meeting the requirements specified in external regulations (regulatory capital adequacy) and (b) ensuring the solvency in normal and stressed conditions (economic capital adequacy/internal capital). Completing that goal, Bank strives to achieve internal long-term capital limits (targets), defined in Risk Strategy.

Capital allocation purpose is to create value for shareholders by maximizing the return on risk in business activity, considering established risk tolerance.

In a scope of capital management process, there is also a capital planning process. The goal of capital planning is to designate the own funds (capital base that is risk-taking capacity) and capital usage (regulatory capital requirements and economic capital) in a way to ensure that capital targets/limits shall be met, given forecasted business strategy and risk profile – in normal and stressed economic conditions.

Regulatory capital adequacy

The Bank is obliged by law to meet minimum own funds requirements, set in art. 92 of Regulation (EU) 2024/1623 of 31 May 2024 amending Regulation (EU) No 575/2012 as regards requirements for credit risk, credit valuation adjustment risk, operational risk market risk and the output floor (CRR 3). At the same time, the following buffers were included in capital targets/limits:

- Pillar II FX mortgage loans buffer (P2R buffer) - in accordance with the joint decision which, among other, covers capital and liquidity at local level for the European entities of the BCP (Banco Comercial Portugues) Group, there was no additional capital or liquidity requirements imposed on the Bank.
- Combined buffer – defined in Act on macro prudential supervision over the financial system and crisis management – that consists of:
 - Capital conservation buffer at the level of 2.5%;
 - Other systemically important institution buffer (OSII) – at the level of 0.25%, and the value is set by PFSA;
 - Systemic risk buffer at the level of 0% in force from March 2020, in line with Regulation of Ministry of Development and Finance;

- Countercyclical buffer at the 1% level from 25 September 2025 and will be raised to 2% on 25 September 2026.

In accordance with binding legal requirements and recommendations of PFSA, the Group defined regulatory minimum levels of capital ratios, being at the same time the base of defining capital limits.

The below table presents these levels as of 31 December 2025. The Bank will inform on each change of required capital levels in accordance with regulations.

Minimum required capital ratios as at the end of 2025

Capital ratio	31.12.2025	
CET1 ratio	Bank	Group
Minimum	4.50%	4.50%
P2R Buffer	0.00%	0.00%
TSCR CET1 (Total SREP Capital Requirements)	4.50%	4.50%
Capital Conservation Buffer	2.50%	2.50%
OSII Buffer	0.25%	0.25%
Systemic risk buffer	0.00%	0.00%
Countercyclical capital buffer	1.00%	1.00%
Combined buffer	3.75%	3.75%
OCR CET1 (Overall Capital Requirements CET1)	8.25%	8.25%
T1 ratio	Bank	Group
Minimum	6.00%	6.00%
P2R Buffer	0.0%	0.0%
TSCR T1 (Total SREP Capital Requirements)	6.0%	6.0%
Capital Conservation Buffer	2.50%	2.50%
OSII Buffer	0.25%	0.25%
Systemic risk buffer	0.00%	0.00%
Countercyclical capital buffer	1.00%	1.00%
Combined buffer	3.75%	3.75%
OCR T1 (Overall Capital Requirements T1)	9.75%	9.75%
TCR ratio	Bank	Group
Minimum	8.00%	8.00%
P2R Buffer	0.00%	0.00%
TSCR TCR (Total SREP Capital Requirements)	8.00%	8.00%
Capital Conservation Buffer	2.50%	2.50%
OSII Buffer	0.25%	0.25%
Systemic risk buffer	0.00%	0.00%
Countercyclical capital buffer	1.00%	1.00%
Combined buffer	3.75%	3.75%
OCR TCR (Overall Capital Requirements TCR)	11.75%	11.75%

In November 2025, the Bank has received a recommendation according to which the PFSA is imposing an additional capital surcharge to absorb potential losses resulting from extreme conditions (P2G).

In particular, on the basis of the 2025 supervisory stress tests carried out by the PFSA, the PFSA set the P2G capital add-ons, before the offsetting of the capital conservation buffer, at 2.63pp at the stand-alone level and 2.53pp at the consolidated level. The total capital charges recommended under Pillar II offset by the capital buffer requirement are 0.13pp at the stand-alone level and 0.03pp at the consolidated level.

The Bank calculates its own funds requirements using standard methodologies and is implementing at the same time a project of an implementation of internal ratings-based method (IRB) for calculation of own funds requirements for credit risk and obtaining of approval decisions from Regulatory Authorities on that matter.

The Bank has the approval of Banco de Portugal (consolidating Regulator) granted with cooperation of PFSA on the use of IRB approach as to following loan portfolios: (i) Retail exposures to individual persons secured by residential real estate collateral (RRE), (ii) Qualifying revolving retail exposures (QRRE).

Internal capital

The Group defines internal capital according to Polish Banking Act, as the estimated amount needed to cover all identified, material risks found in the Bank's activity and changes in economic environment, considering the anticipated level of risk in the future.

Internal capital is used in capital management in following processes: economic capital adequacy management and capital allocation. The Bank defined an internal (economic) capital estimation process. To this end, as for measurable risk types, mathematic and statistic models and methods are used.

Maintaining economic capital adequacy means a coverage (provision) of internal capital (that is an aggregated risk measure) by available financial resources (own funds). An obligation to banks to have in place that sort of risk coverage stems from Banking Act. It was mirrored in the Group's capital targets/limits: economic capital buffer and economic capital buffer in stressed conditions.

In 2025, both above capital targets were met with a surplus. A surplus of own funds over internal capital supports a further increase of banking activity, in areas with a higher risk-adjusted return.

At the same time internal capital is utilised in capital allocation process, to assign an internal capital to products/business lines, calculating risk-adjusted performance measures, setting risk limits and internal capital reallocation.

Capital adequacy evolution

Capital adequacy evolution of the Group and the Bank in 2025 and 2024 was as follows:

Capital adequacy measures <i>(PLN million)</i>	31.12.2025 Group	31.12.2024 Group	31.12.2025 Bank	31.12.2024 Bank
Risk-weighted assets	54 878.7	45 116.2	49 783.1	40 928.3
Own Funds requirements, including:	4 390.6	3 609.3	3 982.6	3 274.3
- Credit risk and counterparty credit risk	3 373.2	3 086.6	2 977.4	2 773.8
- Market risk	23.2	19.8	23.2	19.8
- Operational risk	979.4	500.4	966.6	478.0
- Credit Valuation Adjustment CVA	14.5	2.5	15.4	2.6
Own Funds, including:	8 290.1	7 776.4	7 983.8	7 352.5
- Common Equity Tier 1 Capital	7 508.0	6 688.4	7 201.6	6 264.6
- Tier 2 Capital	782.2	1 087.9	782.2	1 087.9
Total Capital Ratio (TCR)	15.11%	17.24%	16.04%	17.96%
Minimum required level	11.75%	12.21%	11.75%	12.22%
Surplus (+) / Deficit (-) of TCR ratio (pp)	3.36	5.03	4.29	5.74
Tier 1 Capital ratio (T1)	13.68%	14.82%	14.47%	15.31%
Minimum required level	9.75%	9.85%	9.75%	9.85%
Surplus (+) / Deficit (-) of T1 ratio (pp)	3.93	4.97	4.72	5.46
Common Equity Tier 1 Capital ratio (CET1)	13.68%	14.82%	14.47%	15.31%
Minimum required level	8.25%	8.07%	8.25%	8.07%
Leverage ratio	4.64%	4.64%	4.81%	4.67%

At the end of 2025, compared to the end of 2024, capital adequacy measured by the Common Equity Tier 1 capital ratio and the total capital ratio decreased by 114bps and by 213bps respectively. Risk-weighted assets (RWA) increased by PLN 9,762 million (21.6%) in 2025. The largest annual change concerned RWA for operational risk - an increase of PLN 5,988 million (95.7%), due by changed methodology introduced by CRR 3. Changes in RWA for credit risk, market risk, and CVA (due to the fair value adjustment for credit risk) were smaller - a total increase of PLN 3,774 million.

Own funds increased by PLN 514 million (6.6%) in 2025, with basic own funds increasing by PLN 820 million and Tier 2 capital decreasing by PLN 306 million (due to regular depreciation of the existing subordinated bond issues).

The minimum values of capital ratios required by the PFSA in terms of the combined buffer requirement (OCR) are achieved with a surplus at the end of 2025.

Leverage ratio stood at the safe level of 4.64%, and it exceeds the regulatory minimum of 3%.

Minimum requirement for own funds and eligible liabilities (MREL)

The Bank manages MREL requirements indicators in a manner analogous to capital adequacy indicators.

In May 2025 the Bank received a joint decision from the resolution authorities, obliging it to comply with MREL requirements. The decision sets updated minimum requirements at the levels of 15.36% (consolidated MREL_{trea}) and 5.91% (consolidated MREL_{tem}). Additionally, in relation to the above decisions, the Bank should also meet the MREL requirement taking into account the Combined Buffer Requirement (currently 3.75%).

MREL requirements and ratios in 2023 and 2024

MREL	31.12.2025	31.12.2024
MREL_{trea} ratio (consolidated)	24.53%	28.06%
Minimum required level MREL _{trea}	15.36%	18.03%
Surplus (+) / Deficit (-) of MREL _{trea} (pp)	9.17	10.03
Minimum required level including Combined Buffer requirement (CBR)	19.11%	20.78%
Surplus (+) / Deficit (-) of MREL _{trea} + CBR (pp)	5.42	7.28
MREL_{tem} (consolidated)	8.27%	8.71%
Minimum required level of MREL _{tem}	5.91%	5.91%
Surplus (+) / Deficit (-) of MREL _{tem} (pp)	2.36	2.80

In terms of the MREL_{trea} and MREL_{tem} requirements, the Group presents a surplus compared to the minimum required levels as of December 31, 2025, and meets the MREL_{trea} Requirement after the inclusion of the Combined Buffer Requirement.

11.3 Credit risk

Credit risk means uncertainty about the Client's compliance with the financing agreements concluded with the Group i.e., repayment of the principal and interest in the specified time, which may cause a financial loss to the Group.

The credit policy pursued in the Group is based on a set of principles such as:

- centralization of the credit decision process;
- using specific scoring/rating models for each Client segment/type of products;
- using IT information (workflow) to support the credit process at all stages;
- existence of specialized credit decisions departments for particular Client segments;
- regular credit portfolio monitoring, both at the level of each transaction in the case of major exposures, and at credit sub-portfolio level (by the Client segment, type of product, distribution channels, etc.);
- using the structure of limits and sub-limits for credit exposure to avoid credit concentration and promote the effects of credit portfolio diversification;

- separate unit responsible for granting rating to corporate Client, thus separating the credit capacity assessment and credit transaction granting from his creditworthiness assessment.

In the area of credit risk, in 2025, the Group focused on adjusting the principles of its credit policy to changing economic conditions and on improving the tools and processes of credit risk management, in particular

- updated the Risk Strategy for the years 2026-2029;
- optimised the methodology, tools, and processes of credit risk management for retail and corporate clients.

In the retail segment, the Bank concentrated on adjusting its credit policy to the changing macroeconomic environment and evolving external regulatory framework. In particular, development efforts continued with the aim of optimizing and digitizing the credit process.

In 2025, in the corporate segment, the Group focused on enhancing and developing the Bank's lending offer, particularly in the area of investment products, while maintaining a sound risk profile. The Group also carried out initiatives aimed at improving, automating, and digitizing credit processes, including decision-making processes.

All the above changes in both the retail and corporate segment enabled the Group to maintain the risk at an acceptable level defined in the Risk Strategy as well as prepared the Group to new challenges and to act in changed conditions.

Loan portfolio quality

By the end of December 2025, non-performing loans accounted for 3.80% of the total loan portfolio, down from 4.45% at the end of 2024. This reduction aligns with the strategic goal of lowering the NPL ratio below 4% and was achieved largely due to the sales of NPL portfolios and write-offs. The share of loans past-due more than 90 days fell from 2.19% in December 2024 to 2.05% in December 2025.

Total risk provisions now cover 78.94% of impaired loans, up from 72.89% in December 2024, even after PLN178mn in write-offs and PLN446mn in loan sales.

In 2025, the Group revised its SICR methodology for unrated portfolios, increasing stage 2 loans in the performing portfolio from 8.4% (end-2024) to 8.6% (December 2025). The main impact was on corporate exposures, with the ratio rising from 7.9% to 10.4%, though this had little effect on provisioning as the exposures reclassified to stage 2 were of short residual maturity, resulting in 12-month and lifetime ECL being effectively equivalent.

The evolution of main indicators of the Group's loan portfolio quality is presented below:

Group loans quality indicators	31.12.2025	31.12.2024
Total impaired loans * (PLN million)	2 994	3 450
Total provisions ** (PLN million)	2 363	2 514
Impaired over total loans ratio (%)	3.80%	4.45%
Loans past-due over 90 days /total loans (%)	2.05%	2.19%
Total provisions/impaired loans (%)	78.94%	72.89%

(*) Impaired exposures include all receivables classified in Stage 3, as well as impaired receivables from the POCI portfolio

(**) without off-balance

The impaired loans ratio fell for retail clients from 4.40% to 3.91% (with declines of 1.36pp in other retail and 0.24pp in mortgages) and for the corporate portfolio from 4.65% to 3.47% (driven by a 0.56pp drop in leasing and a 1.54pp drop in other corporate loans). The gross carrying amount of foreign currency mortgage loans dropped about 46% year-to-date due to amortization and higher legal risk provisions reducing the gross carrying amount. The ex-Euro Bank mortgage portfolio (ca. PLN554mn) is backed by a Société Générale guarantee. Without this, the share of FX mortgages in total loans falls from 1.5% to 0.8%.

The evolution of the Group's loan portfolio quality by main products groups is presented in the table below:

Portfolio quality by products:	Loans past-due > 90 days ratio		Impaired loans Ratio	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024
Mortgage	0.76%	0.95%	2.05%	2.29%
Other retail*	4.41%	4.65%	6.80%	8.16%
Total retail clients*	2.19%	2.28%	3.91%	4.40%
Leasing	1.46%	1.11%	4.30%	4.86%
Other loans to companies	1.75%	2.43%	2.96%	4.50%
Total companies	1.64%	1.85%	3.47%	4.65%
Total loan portfolio	2.05%	2.19%	3.80%	4.45%

(*) incl. Microbusiness, annual turnover below PLN 5 million

The Group's portfolio is diversified, both due to the concentration of the largest exposures and due to the concentration in sectors of the economy. Participation of the 10 largest exposures remain at a safe level of 5.4% (increase in 2025 from 4.2% at the end of 2024).

The distribution of the portfolio by Stage 1 and 2 and PD ranges as well as the distribution by Stage3 and POCI and months in default is presented below separately for the following homogenous portfolios: Mortgage, Other retail, Other Corporate and Leasing.

The average 12-month Probability of Default (PD) for Stage 1/2 in Mortgage decreased from 0.59% in 2024 to 0.51%, which reflect the modest decline in recent empirical default rates. At the same time, the average Loss Given Default (LGD) remained at 17.33%, only slightly lower than the 17.40% reported in 2024, showing a consistent pattern in anticipated recoveries for this group. LGD value in Stage 3 and Purchased or Originated Credit Impaired (POCI) portfolios decreased from 55.13% in 2024 to 53.63% by the end of 2025.

Distribution of non-defaulted portfolio by 12-month PD for Mortgage segment (PLNmn):

31.12.2025									
	PD scale	Gross balance exposure	Off-balance exposure	Number of exposures	Average maturity (yrs)	EAD	Average PD (%)	Average LGD (%)	ECL*
Stage 1	0% - 0.14%	24 894.1	378.9	118 617	19.9	25 637.3	0.08%	17.31%	3.6
	0.15% - 0.24%	447.2	0.0	12 350	16.4	803.0	0.19%	13.39%	0.2
	0.25% - 0.49%	4 077.9	84.3	16 335	21.4	4 248.8	0.37%	18.13%	2.7
	0.50% - 0.74%	1 772.1	17.7	7 268	21.8	1 833.0	0.62%	17.05%	1.9
	0.75% - 2.49%	1 339.3	28.2	6 966	21.2	1 431.8	1.37%	17.38%	3.3
	2.50% - 9.99%	618.1	15.7	2 652	22.0	658.8	4.23%	17.56%	4.7
	10.00% -44.99%	36.6	0.0	146	22.7	38.3	13.16%	16.56%	0.8
	45.00% -100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	33 185.3	524.7	164 334	20.2	34 651.0	0.30%	17.31%	17.3
Stage 2	0% - 0.14%	284.9	178.9	1 451	25.2	466.7	0.08%	21.23%	3.6
	0.15% - 0.24%	3.4	0.0	79	15.3	7.9	0.20%	17.90%	0.0
	0.25% - 0.49%	153.0	0.0	719	19.2	154.5	0.41%	16.47%	1.1
	0.50% - 0.74%	451.1	0.3	1 709	20.2	458.3	0.65%	16.12%	4.9
	0.75% - 2.49%	634.7	3.3	2 546	21.1	649.2	1.44%	17.07%	11.9
	2.50% - 9.99%	504.6	1.8	1 910	21.6	516.5	4.90%	16.91%	16.8
	10.00% -44.99%	167.3	0.0	699	21.9	170.6	23.41%	16.27%	12.2
	45.00% -100%	10.7	0.0	97	21.2	11.3	72.96%	15.78%	1.5
	Total Stage 2	2 209.7	184.3	9 210	21.8	2 434.9	3.56%	17.56%	52.1
Total Stage 1+2	35 395.0	709.0	173 544	20.3	37 085.9	0.51%	17.33%	69.4	
31.12.2024									
Stage 1	0% - 0.14%	24 979.9	545.0	115 512	21.0	25 947.1	0.10%	17.67%	4.6
	0.15% - 0.24%	3 163.0	40.9	30 095	19.4	3 335.0	0.19%	15.97%	0.9
	0.25% - 0.49%	2 898.4	66.5	13 726	21.2	3 354.4	0.34%	18.07%	2.0
	0.50% - 0.74%	1 415.9	20.3	6 694	21.9	1 498.4	0.65%	17.22%	1.6
	0.75% - 2.49%	2 302.7	34.7	12 189	22.1	2 433.1	1.09%	16.30%	4.1
	2.50% - 9.99%	811.1	12.5	3 941	22.5	873.2	4.25%	16.51%	5.9
	10.00% -44.99%	43.9	0.0	165	23.2	45.4	15.07%	17.25%	1.1
	45.00% -100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	35 614.9	719.9	182 322	21.0	37 486.6	0.33%	17.42%	20.3
Stage 2	0% - 0.14%	245.7	0.0	856	23.7	248.8	0.10%	17.01%	0.5
	0.15% - 0.24%	34.9	0.0	204	19.8	35.4	0.17%	16.73%	0.2
	0.25% - 0.49%	147.7	0.0	775	18.9	152.9	0.36%	17.19%	1.3
	0.50% - 0.74%	201.4	0.0	910	18.8	205.7	0.65%	17.15%	2.1
	0.75% - 2.49%	1 070.7	1.2	4 149	21.9	1 092.5	1.11%	17.22%	17.5
	2.50% - 9.99%	701.2	6.8	2 879	22.2	723.2	4.65%	16.99%	23.1
	10.00%-44.99%	186.8	0.0	850	22.5	191.8	26.26%	16.82%	15.5
	45.00% -100%	16.6	0.2	134	20.8	20.6	74.44%	16.24%	2.8
	Total Stage 2	2 604.8	8.2	10 757	21.7	2 670.9	4.25%	17.09%	63.0
Total Stage 1+2	38 219.7	728.1	193 079	21.1	40 157.5	0.59%	17.40%	83.3	

(*) For Stage 2 - ECL Lifetime

Distribution of Stage 3 and POCI portfolio by time in default for Mortgage segment (PLNmn):

31.12.2025					
	Time in default	Number of exposures	EAD	Average LGD (%)	ECL*
Stage 3	<12 months	626	138.9	29.62%	41.1
	13 - 24 months	492	102.1	36.21%	37.0
	25 - 36 months	559	112.6	43.64%	49.1
	37 - 48 months	436	77.8	53.05%	41.3
	49 - 60 months	276	54.1	47.39%	25.6
	61 - 84 months	391	64.4	56.36%	36.3
	> 84 months	789	126.3	77.66%	98.1
	Total Stage 3	3 569	676.2	48.59%	328.6
POCI	Non-Default	117	19.9	29.97%	8.4
	<12 months	2	0.4	27.55%	0.1
	13 - 24 months	6	0.9	44.23%	0.4
	25 - 36 months	5	1.3	53.36%	0.7
	37 - 48 months	10	3.1	72.80%	2.3
	49 - 60 months	6	1.7	67.57%	1.1
	61 - 84 months	170	83.8	97.07%	81.3
	> 84 months	12	4.1	97.95%	4.0
	Total POCI	328	115.2	83.25%	98.4
Total Stage 3+POCI					
3 897					
791.5					
53.63%					
427.0					
31.12.2024					
Stage 3	<12 months	881	167.6	32.80%	55.0
	13 - 24 months	848	171.6	39.72%	68.1
	25 - 36 months	616	119.0	44.22%	52.6
	37 - 48 months	382	76.5	48.24%	36.9
	49 - 60 months	295	48.4	53.97%	26.1
	61 - 84 months	765	130.4	66.88%	87.2
	> 84 months	604	117.4	79.30%	93.1
	Total Stage 3	4 391	830.8	50.44%	419.0
POCI	Non-Default	129	21.5	30.04%	9.3
	<12 months	11	1.8	35.40%	0.6
	13 - 24 months	12	3.2	45.31%	1.4
	25 - 36 months	15	4.8	55.27%	2.7
	37 - 48 months	7	1.5	73.80%	1.1
	49 - 60 months	23	10.2	90.82%	9.3
	61 - 84 months	229	95.1	95.41%	90.7
	> 84 months	14	6.4	99.36%	6.3
	Total POCI	440	144.5	82.10%	121.5
Total Stage 3+POCI					
4 831					
975.3					
55.13%					
540.5					

(*) For POCI – current ECL value (not provisions)

Within the Other Retail portfolio, the average 12-month Probability of Default (PD) for Stage 1 and 2 declined from 2.87% to 2.76%, indicating an improvement in the observed default rate for this segment.

Conversely, the average Loss Given Default (LGD) increased for both Stage 1 and 2 portfolios (49.77% compared to 47.26% in 2024) and Stage 3 and POCI portfolios (66.31% compared to 63.48%), attributed to marginally lower recoveries in this portfolio.

Distribution of non-defaulted portfolio by 12-month PD for Other Retail segment (PLNmn):

31.12.2025									
	PD scale	Gross balance exposure	Off-balance exposure	Number of exposures	Average maturity (yrs)	EAD	Average PD (%)	Average LGD (%)	ECL *
Stage 1	0% - 0.14%	2 893.2	452.6	435 788	5.3	3 081.8	0.13%	49.38%	1.9
	0.15% - 0.24%	976.8	2 297.0	503 425	9.6	1 933.6	0.17%	49.90%	1.6
	0.25% - 0.49%	1 850.0	234.0	224 034	5.0	1 932.0	0.37%	47.37%	3.3
	0.50% - 0.74%	2 133.8	180.1	162 723	5.6	2 207.0	0.57%	49.51%	6.0
	0.75% - 2.49%	5 085.6	297.3	305 305	6.0	5 239.7	1.27%	50.59%	32.0
	2.50% - 9.99%	3 271.6	65.8	134 963	6.4	3 336.3	4.00%	52.05%	65.6
	10.00% - 44.99%	609.0	4.1	23 382	6.4	617.9	14.06%	51.11%	42.0
	45.00% - 100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	16 820.0	3 530.9	1 789 620	6.2	18 348.3	1.71%	50.13%	152.4
Stage 2	0% - 0.14%	16.0	9.2	9 047	7.3	20.2	0.13%	44.32%	0.5
	0.15% - 0.24%	20.7	48.7	19 291	10.9	50.8	0.19%	44.90%	0.7
	0.25% - 0.49%	52.4	30.3	17 918	7.1	65.1	0.38%	44.68%	1.6
	0.50% - 0.74%	92.4	58.9	26 108	7.5	112.3	0.58%	46.11%	3.8
	0.75% - 2.49%	537.3	99.1	68 511	6.9	571.6	1.34%	47.12%	25.8
	2.50% - 9.99%	579.6	35.6	54 600	7.2	590.8	4.70%	46.61%	55.6
	10.00% - 44.99%	649.2	6.6	44 137	6.0	645.4	22.29%	46.95%	106.4
	45.00% - 100%	90.0	1.2	7 055	6.2	90.5	78.11%	48.08%	35.4
	Total Stage 2	2 037.6	289.6	246 667	6.8	2 146.6	11.69%	46.76%	230.0
Total Stage 1+2									
18 857.6 3 820.6 2 036 287 6.3 20 494.9 2.76% 49.77% 382.3									
31.12.2024									
Stage 1	0% - 0.14%	771.7	209.4	275 695	5.3	949.7	0.10%	45.47%	0.4
	0.15% - 0.24%	1 752.5	2 342.3	599 434	9.0	3 819.6	0.17%	49.51%	3.1
	0.25% - 0.49%	1 807.1	228.9	244 261	5.2	1 987.2	0.38%	44.36%	3.2
	0.50% - 0.74%	2 066.0	201.4	185 521	5.7	2 232.9	0.62%	46.06%	6.1
	0.75% - 2.49%	5 368.8	328.6	350 456	6.2	5 694.9	1.37%	47.36%	35.2
	2.50% - 9.99%	3 438.7	69.1	150 035	6.5	3 542.5	4.38%	49.10%	72.3
	10.00% - 44.99%	629.8	4.5	25 476	6.5	642.1	15.00%	48.35%	44.0
	45.00% - 100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	15 834.5	3 384.2	1 830 878	6.6	18 868.9	1.90%	47.59%	164.3
Stage 2	0% - 0.14%	6.9	0.2	8 482	1.0	7.0	0.10%	40.76%	0.0
	0.15% - 0.24%	28.5	52.6	21 370	10.2	78.2	0.17%	44.41%	0.8
	0.25% - 0.49%	56.3	34.4	20 178	7.6	86.8	0.39%	44.91%	1.6
	0.50% - 0.74%	101.5	41.6	22 458	7.5	137.4	0.60%	44.52%	2.8
	0.75% - 2.49%	581.6	113.7	74 363	7.3	680.5	1.40%	45.75%	24.6
	2.50% - 9.99%	653.5	41.4	62 485	7.1	689.9	4.83%	44.36%	53.3
	10.00% - 44.99%	637.9	6.8	47 862	5.8	638.3	23.06%	43.70%	96.2
	45.00% - 100%	76.9	1.3	6 976	6.1	77.7	77.94%	44.83%	28.1
	Total Stage 2	2 143.1	292.1	264 174	6.9	2 395.7	10.52%	44.62%	207.5
Total Stage 1+2									
17 977.7 3 676.3 2 095 052 6.7 21 264.6 2.87% 47.26% 371.7									

(*) For Stage 2 - ECL Lifetime

Distribution of Stage 3 and POCI portfolio by time in default for Other Retail segment (PLNmn):

31.12.2025					
	Time in default	Number of exposures	EAD	Average LGD (%)	ECL*
Stage 3	<12 months	31 772	500.5	54.37%	272.1
	13 - 24 months	15 329	242.3	62.08%	150.4
	25 - 36 months	10 483	171.7	69.41%	119.2
	37 - 48 months	7 218	118.1	75.97%	89.7
	49 - 60 months	5 018	91.8	81.72%	75.0
	61 - 84 months	5 454	91.0	85.23%	77.6
	> 84 months	2 612	26.1	97.12%	25.3
	Total Stage 3	77 886	1 241.5	65.19%	809.3
POCI	Non-Default	1 196	14.9	41.95%	6.5
	<12 months	104	2.6	50.79%	1.3
	13 - 24 months	46	1.4	64.14%	0.9
	25 - 36 months	42	1.1	71.08%	0.8
	37 - 48 months	30	0.5	72.68%	0.4
	49 - 60 months	38	1.4	73.54%	1.1
	61 - 84 months	2 204	71.8	89.42%	64.2
	> 84 months	169	4.1	92.39%	3.8
	Total POCI	3 829	97.9	80.41%	79.0
Total Stage 3+POCI					
81 715					
1 339.3					
66.31%					
888.3					
31.12.2024					
Stage 3	<12 months	37 135	578.4	47.86%	276.8
	13 - 24 months	21 048	330.4	59.79%	197.6
	25 - 36 months	12 690	202.4	70.57%	142.8
	37 - 48 months	8 502	153.4	78.39%	120.2
	49 - 60 months	5 585	108.2	84.11%	91.0
	61 - 84 months	5 794	68.8	82.05%	56.5
	> 84 months	2 196	22.2	97.79%	21.7
	Total Stage 3	92 950	1 463.7	61.94%	906.6
POCI	Non-Default	1 628	22.9	41.52%	7.9
	<12 months	143	4.0	51.29%	2.1
	13 - 24 months	106	3.1	67.37%	2.1
	25 - 36 months	81	1.7	71.47%	1.2
	37 - 48 months	84	2.8	72.81%	2.0
	49 - 60 months	173	6.8	81.05%	5.5
	61 - 84 months	3 518	115.3	85.04%	98.0
	> 84 months	241	5.3	91.52%	4.8
	Total POCI	5 974	161.8	77.41%	123.7
Total Stage 3+POCI					
98 924					
1 625.5					
63.48%					
1 030.3					

* For POCI – current ECL value (not provisions)

Within the Other Corporate portfolio, an increase in the average 12-month Probability of Default (PD) for Stage 1 and 2 from 2.36% to 2.77% indicates a small deterioration in the portfolio, both in terms of observed default rates and outlook for the year 2026. A modest improvement in recoveries has resulted in a reduction of the Loss Given Default (LGD) for Stage 1 and 2 portfolios from 43.84% in 2024 to 41.26% in 2025. Despite the increase in the average Loss Given Default (LGD) for the Stage 3 and POCI portfolio from 34.23% to 38.05%, it continues to indicate a high level of recoveries. This is primarily attributed to the high quality and value of the underlying collaterals.

Distribution of non-defaulted portfolio by 12-month PD for Other Corporate segment (PLNmn):

31.12.2025									
	PD scale	Gross balance exposure	Off-balance exposure	Number of exposures	Average maturity (yrs)	EAD	Average PD (%)	Average LGD (%)	ECL*
Stage 1	0% - 0.14%	190.0	143.4	4 900	6.6	302.6	0.04%	36.77%	0.0
	0.15% - 0.24%	143.8	23.1	2 099	5.7	161.8	0.16%	36.51%	0.1
	0.25% - 0.49%	368.1	31.2	4 101	5.5	392.6	0.33%	35.61%	0.4
	0.50% - 0.74%	605.6	979.5	5 105	2.4	1 274.9	0.68%	39.97%	3.4
	0.75% - 2.49%	6 803.5	6 998.4	31 125	3.9	10 620.7	1.50%	42.37%	66.6
	2.50% - 9.99%	4 150.3	2 443.8	7 678	3.0	5 338.1	4.09%	40.82%	86.5
	10.00% -44.99%	378.8	100.2	2 607	4.9	404.3	15.02%	38.30%	22.6
	45.00% - 100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	12 640.1	10 719.5	57 615	3.6	18 495.0	2.43%	41.38%	179.6
Stage 2	0% - 0.14%	3.1	3.0	125	8.7	5.5	0.05%	35.01%	0.1
	0.15% - 0.24%	4.3	2.2	80	7.3	6.1	0.16%	37.02%	0.2
	0.25% - 0.49%	18.5	5.2	149	6.3	22.8	0.34%	34.98%	0.5
	0.50% - 0.74%	22.7	22.7	191	2.7	32.4	0.69%	34.77%	0.4
	0.75% - 2.49%	636.2	969.9	2 980	1.3	1 238.2	1.74%	41.94%	10.9
	2.50% - 9.99%	476.3	429.6	1 767	2.3	673.5	5.00%	40.57%	20.5
	10.00% -44.99%	296.6	40.6	2 438	4.2	299.7	19.69%	34.47%	30.4
	45.00% -100%	14.2	0.0	252	4.5	14.0	84.77%	33.75%	4.2
	Total Stage 2	1 471.9	1 473.2	7 982	2.1	2 292.1	5.51%	40.31%	67.2
Total Stage 1+2		14 112.0	12 192.8	65 597	3.5	20 787.2	2.77%	41.26%	246.8
31.12.2024									
Stage 1	0% - 0.14%	169.8	145.1	4 800	7.4	309.4	0.05%	34.22%	0.1
	0.15% - 0.24%	118.3	20.4	2 041	6.2	138.7	0.22%	33.32%	0.1
	0.25% - 0.49%	320.1	475.3	3 750	2.6	714.1	0.47%	42.08%	1.4
	0.50% - 0.74%	1 046.4	3 051.7	3 560	1.5	2 907.6	0.60%	45.05%	7.7
	0.75% - 2.49%	5 404.5	3 515.0	87 287	2.1	7 320.8	1.41%	45.73%	46.3
	2.50% - 9.99%	2 633.9	1 266.9	11 029	2.0	3 221.4	4.02%	43.51%	54.5
	10.00% -44.99%	248.4	19.0	2 619	5.2	255.5	16.83%	31.62%	12.7
	45.00% - 100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	9 941.4	8 493.3	115 086	2.2	14 867.5	2.00%	44.34%	122.7
Stage 2	0% - 0.14%	2.1	2.3	87	9.5	4.3	0.05%	36.70%	0.1
	0.15% - 0.24%	6.5	2.7	78	7.1	9.2	0.21%	35.10%	0.2
	0.25% - 0.49%	22.2	3.6	178	6.3	25.6	0.44%	34.67%	0.5
	0.50% - 0.74%	33.8	81.3	152	1.3	89.7	0.62%	45.39%	0.4
	0.75% - 2.49%	253.0	185.7	623	1.8	394.9	1.53%	41.57%	3.6
	2.50% - 9.99%	348.1	143.5	982	2.1	389.1	4.71%	35.45%	9.0
	10.00% -44.99%	205.1	29.8	2 231	3.9	210.9	20.92%	30.50%	17.6
	45.00% - 100%	13.2	0.1	206	4.7	13.2	85.43%	25.32%	3.0
	Total Stage 2	883.9	449.0	4 537	2.4	1 136.9	7.07%	37.31%	34.2
Total Stage 1+2		10 825.3	8 942.3	119 623	2.2	16 004.4	2.36%	43.84%	157.0

(*) For Stage 2 - ECL Lifetime

Distribution of Stage 3 and POCI portfolio by time in default for Other Corporate segment (PLNmn):

31.12.2025					
	Time in default	Number of exposures	EAD	Average LGD (%)	ECL*
Stage 3	<12 months	1 934	256.4	31.81%	81.6
	13 - 24 months	1 350	159.2	32.84%	52.3
	25 - 36 months	845	74.7	53.08%	39.6
	37 - 48 months	366	9.4	53.82%	5.0
	49 - 60 months	134	4.7	68.34%	3.2
	61 - 84 months	172	39.4	67.26%	26.5
	> 84 months	110	5.3	71.37%	3.8
	Total Stage 3	4 911	549.0	38.61%	212.0
POCI	Non-Default	0	0.0	0.00%	0.0
	<12 months	0	0.0	0.00%	0.0
	13 - 24 months	1	0.0	0.00%	0.0
	25 - 36 months	4	26.4	23.06%	6.1
	37 - 48 months	0	0.0	0.00%	0.0
	49 - 60 months	0	0.0	0.00%	0.0
	61 - 84 months	1	0.0	100.00%	0.0
	> 84 months	1	15.9	43.51%	6.9
	Total POCI	7	42.4	30.75%	13.0
Total Stage 3+POCI					
4 918					
591.4					
38.05%					
225.0					
31.12.2024					
Stage 3	<12 months	1 561	364.2	25.80%	94.0
	13 - 24 months	906	123.0	36.21%	44.6
	25 - 36 months	459	15.4	53.58%	8.3
	37 - 48 months	202	7.5	69.12%	5.2
	49 - 60 months	149	35.5	45.44%	16.2
	61 - 84 months	192	32.2	71.90%	23.1
	> 84 months	90	37.1	59.53%	22.1
	Total Stage 3	3 559	614.9	34.69%	213.3
POCI	Non-Default	1	0.0	0.00%	0.0
	<12 months	0	0.0	0.00%	0.0
	13 - 24 months	0	0.0	0.00%	0.0
	25 - 36 months	1	18.7	19.35%	3.6
	37 - 48 months	0	0.0	0.00%	0.0
	49 - 60 months	0	0.0	0.00%	0.0
	61 - 84 months	1	0.0	97.49%	0.0
	> 84 months	0	0.0	0.00%	0.0
	Total POCI	3	18.7	19.36%	3.6
Total Stage 3+POCI					
3 562					
633.5					
34.23%					
216.9					

(*) For POCI – current ECL value (not provisions)

Compared to the year 2024, the average 12-month PD for Stage 1 and 2 in Leasing decreased from 4.44% to 4.24%. There was observed improvement of the average LGD for Stage 1 and 2 (21.65% vs. 24.57% in 2024). The average Stage 3 LGD increased from 22.28% to 26.35% which results from higher coverage with provisions in the individual analysis.

Distribution of non-defaulted portfolio by 12-month PD for Leasing segment (PLNmn):

31.12.2025									
	PD scale	Gross balance exposure	Off-balance exposure	Number of exposures	Average maturity (yrs)	EAD	Average PD (%)	Average LGD (%)	ECL*
Stage 1	0% - 0.14%	447.7	0.0	6 579	2.4	447.7	0.07%	16.71%	0.0
	0.15% - 0.24%	399.5	0.0	4 454	2.9	399.5	0.22%	19.59%	0.2
	0.25% - 0.49%	618.0	0.0	7 372	2.7	618.0	0.41%	18.75%	0.4
	0.50% - 0.74%	116.4	0.0	1 983	1.6	116.4	0.59%	19.78%	0.1
	0.75% - 2.49%	2 607.0	0.0	20 846	3.3	2 607.0	1.52%	22.93%	8.8
	2.50% - 9.99%	1 506.8	0.0	10 726	3.5	1 506.8	4.34%	22.75%	14.0
	10.00%-44.99%	437.0	0.0	2 662	3.5	437.0	14.86%	23.38%	13.6
	45.00% -100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	6 132.2	0.0	54 622	3.2	6 132.2	2.84%	21.77%	37.2
Stage 2	0% - 0.14%	13.1	0.0	160	2.6	13.1	0.07%	12.53%	0.0
	0.15% - 0.24%	8.2	0.0	87	2.0	8.2	0.21%	11.12%	0.0
	0.25% - 0.49%	16.1	0.0	137	2.9	16.1	0.41%	19.42%	0.1
	0.50% - 0.74%	8.4	0.0	130	1.4	8.4	0.58%	16.02%	0.0
	0.75% - 2.49%	93.8	0.0	774	2.5	93.8	1.46%	18.72%	0.4
	2.50% - 9.99%	202.3	0.0	2 032	2.5	202.3	5.12%	21.33%	3.4
	10.00% -44.99%	389.3	0.0	3 449	2.9	389.3	20.62%	21.32%	21.1
	45.00% -100%	40.3	0.0	436	3.0	40.3	64.11%	21.88%	5.9
	Total Stage 2	771.6	0.0	7 205	2.7	771.6	15.29%	20.68%	31.0
Total Stage 1+2									
6 903.8 0.0 61 827 3.1 6 903.8 4.24% 21.65% 68.1									
31.12.2024									
Stage 1	0% - 0.14%	308.4	0.0	2 792	3.3	308.4	0.07%	23.63%	0.1
	0.15% - 0.24%	73.2	0.0	551	3.5	73.2	0.19%	22.34%	0.0
	0.25% - 0.49%	175.5	0.0	1 892	3.1	175.5	0.32%	25.22%	0.1
	0.50% - 0.74%	216.7	0.0	1 926	3.1	216.7	0.57%	27.43%	0.3
	0.75% - 2.49%	1 011.4	0.0	9 959	2.7	1 011.4	1.49%	28.03%	3.9
	2.50% - 9.99%	4 237.9	0.0	37 970	3.3	4 237.9	4.36%	23.96%	41.1
	10.00% - 44.99%	18.8	0.0	213	3.4	18.8	17.25%	23.15%	0.7
	45.00% -100%	0.0	0.0	0	0.0	0.0	0.00%	0.00%	0.0
	Total Stage 1	6 041.8	0.0	55 303	3.2	6 041.8	3.40%	24.76%	46.3
Stage 2	0% - 0.14%	2.2	0.0	37	1.3	2.2	0.09%	11.38%	0.0
	0.15% - 0.24%	0.4	0.0	29	1.3	0.4	0.20%	16.75%	0.0
	0.25% - 0.49%	4.9	0.0	91	1.9	4.9	0.33%	21.93%	0.0
	0.50% - 0.74%	4.0	0.0	79	2.3	4.0	0.59%	19.60%	0.0
	0.75% - 2.49%	46.8	0.0	479	2.3	46.8	1.47%	25.18%	0.3
	2.50% - 9.99%	354.5	0.0	2 994	3.2	354.5	4.49%	22.55%	6.1
	10.00% -44.99%	98.0	0.0	851	2.8	98.0	34.21%	22.78%	8.4
	45.00% -100%	78.7	0.0	836	3.1	78.7	49.90%	21.62%	9.2
	Total Stage 2	589.5	0.0	5 396	3.0	589.5	15.17%	22.60%	24.0
Total Stage 1+2									
6 631.4 0.0 60 699 3.1 6 631.4 4.44% 24.57% 70.3									

(*) For Stage 2 - ECL Lifetime

Distribution of Stage 3 and POCI portfolio by time in default for Leasing segment (PLNmn):

31.12.2025					
	Time in default	Number of exposures	EAD	Average LGD (%)	ECL *
Stage 3	<12 months	1 859	198.0	24.83%	49.2
	13 - 24 months	1 088	83.2	20.42%	17.0
	25 - 36 months	459	21.9	49.21%	10.8
	37 - 48 months	600	13.2	48.70%	6.4
	49 - 60 months	0	0.0	0.00%	0.0
	61 - 84 months	0	0.0	0.00%	0.0
	> 84 months	0	0.0	0.00%	0.0
	Total Stage 3	4 006	316.3	26.35%	83.3
POCI	Non-Default	0	0.0	0.00%	0.0
	<12 months	0	0.0	0.00%	0.0
	13 - 24 months	0	0.0	0.00%	0.0
	25 - 36 months	0	0.0	0.00%	0.0
	37 - 48 months	0	0.0	0.00%	0.0
	49 - 60 months	0	0.0	0.00%	0.0
	61 - 84 months	0	0.0	0.00%	0.0
	> 84 months	0	0.0	0.00%	0.0
	Total POCI	0	0.0	0.00%	0.0
Total Stage 3+POCI					
4 006					
316.3					
26.35%					
83.3					
31.12.2024					
Stage 3	<12 months	2 206	229.3	16.21%	37.2
	13 - 24 months	1 125	72.0	29.03%	20.9
	25 - 36 months	232	21.6	31.69%	6.8
	37 - 48 months	431	21.8	54.50%	11.9
	49 - 60 months	0	0.0	0.00%	0.0
	61 - 84 months	0	0.0	0.00%	0.0
	> 84 months	0	0.0	0.00%	0.0
	Total Stage 3	3 994	344.7	22.28%	76.8
POCI	Non-Default	0	0.0	0.00%	0.0
	<12 months	0	0.0	0.00%	0.0
	13 - 24 months	0	0.0	0.00%	0.0
	25 - 36 months	0	0.0	0.00%	0.0
	37 - 48 months	0	0.0	0.00%	0.0
	49 - 60 months	0	0.0	0.00%	0.0
	61 - 84 months	0	0.0	0.00%	0.0
	> 84 months	0	0.0	0.00%	0.0
	Total POCI	0	0.0	0.00%	0.0
Total Stage 3+POCI					
3 994					
344.7					
22.28%					
76.8					

(*) For POCI – current ECL value (not provisions)

On 31.12.2025 value of collaterals on accounts or assets of borrowers from the corporate segment (without leasing) amounted to PLN7,274.2mn while on accounts or assets of mortgage borrowers (including MBH) amounted to PLN88,654.9mn

11.4 Other risks

Market Risk and Interest Rate Risk in the Banking Book (IRRBB)

The market risk encompasses current and prospective impact on earnings or capital, arising from changes in the value of the Group's portfolio due to adverse market movement (prices).

The interest rate risk arising from Banking Book activities (IRRBB) encompasses current or prospective impact to both the earnings and the economic value of the Group's portfolio arising from adverse movements in interest rates that affect interest rate sensitive instruments. The risk includes gap risk, basis risk and Client's option risk and credit spread risk (CSRBB).

The framework of market risk and interest rate risk management and its control are defined on a centralized basis with the use of the same concepts and metrics which are used in all the entities of the BCP Group.

The main measure used by the Group to evaluate market risks is the parametric VaR (Value at Risk) model – an expected loss that may arise on the portfolio over a specified period (holding period) with a required probability (confidence level) due to an adverse market movement. The market risk measurement is carried out daily (intra-day and end-of-day), both on an individual basis for each of the areas responsible for risk taking and risk management, and in consolidated terms for Global Bank, Banking Book and Trading Book considering the effect of the diversification that exists between the portfolios. In addition, each Book is divided into the risk management areas.

In 2025, the VaR limits were not breached for Global Bank and also for Trading and Banking Book. It should be noted that the value at risk in Banking Book is only complementary risk measurement tool as positions are expected to be held to maturity and are in large majority not marked to market. All excesses of market risk limits are always reported, documented, and ratified at the proper competence level.

Within the current market environment, the Group continued to operate in a prudent manner. In 2025, open positions mostly included interest-rate instruments and FX risk instruments. In 2025, the VaR indicators for the Group remained on average at the level of PLN204.2mn (36 per cent of the limit) and PLN161.4mn (28 per cent of the limit) as of the end of December 2025. The limits currently in force have been effective since 30th September 2024 and remain conservative - level for Global Bank no more than PLN574.5mn and for Trading Book no more than PLN20.8mn. In December 2025, the Risk Committee conducted a review of the market limits and confirmed their continued adequacy. FX open position (Intraday as well as Overnight) remained below 2 per cent of The Own Funds and well below the maximum limits in place.

Apart from daily measurement at the level of each book and market risk area, the VaR model is mainly applicable and analysed at the Trading Book level, where the policy intention is to trade positions on the regular basis (mostly daily). On contrary, following the supervisory guidelines, the interest rate risk in Banking Book is mainly covered by both earnings-based and economic value measures, by measuring:

- the impact on the net interest income over a time horizon of next 12 months resulting from one-off interest rate shock of upward/downward yield curve shift by 100 basis points,
- the impact on net interest income over a time horizon of next 12 months resulting from supervisory outlier test (SOT) shocks including parallel up and parallel down scenarios,
- the impact on the economic value of equity (EVE) resulting from 100 bps upward/downward yield curve movements,
- the impact on the economic value of equity (EVE) resulting from a supervisory outlier test (SOT) shocks (set of six interest rate risk stress scenarios).

Exposure to interest rate risk in the Banking Book are primarily generated by the differences in repricing dates of assets and liabilities as well as its reference indexes, if contractually existing. Regarding EVE measures, it is specifically affected by the unbalance between assets and liabilities that have fixed rate. In case of low interest rates, significant impact is tied to liabilities which cannot have interest rate lower than 0. Consequently, the level of sensitivity to interest rate changes is influenced by the level of interest rates taken as a reference. Additionally, due to specificity of the Polish legal system, the interest rate of credits is limited (it cannot exceed two times Reference Rate of the National Bank of Poland increased by 7 percentage points). In situations of decreasing interest rates, the impact on Net Interest Income is negative and depends on the structure of the asset portfolio, including the share of assets subject to immediate revaluation. On the other hand, assumptions regarding the timing and size of deposits repricing are also very important when assessing the interest rate sensitivity and risk.

The results of the IRRBB measurement as of the end of December 2025 indicate that the Group is the most exposed to scenarios of interest rates increase in case of EVE metrics and interest rates decrease in case of NII metrics. In case of supervisory outlier test for EVE, results as of December 2025 show that even under the most severe outlier test scenario, the decline of EVE for Banking Book is below supervisory limit of 15% of Tier 1 Capital.

The results of sensitivity of NII for the next 12 months after 31st December 2025 and for position in Banking Book are carried out under the following assumptions:

- static balance sheet structure as of that reference date (no change during the following 12 months),
- reference level of net interest income assuming that all assets and liabilities with variable interest rate already reflect market interest rates levels as of 31st December 2025 (for example, the NBP Reference rate was set to 4.00%, i.e. reflecting a cumulative cut of 175bps in 2025, of which 75bps in 4Q 2025),
- application of a parallel move of 100bps in the yield curve up and down is an additional shock to all market interest rates levels as of 31st December 2025 and is set at the repricing date of the assets and liabilities that happens during the 12 following months.

As of 31 December 2025, the main net interest income's sensitivity measure - calculated under a scenario of parallel shift of interest rates by 100 basis points over a 12-month horizon following 31 December 2025 (with the most adverse scenario being a decrease in interest rates) - stood at 2.18%.

The Bank has already taken a set of measures aimed at protecting its net interest income.

More information on market risk and interest rate risk management can be found in chapter 8.4 of the Annual Consolidated Report of the Bank Millennium S.A. Capital Group for the 12-month period ending 31st December 2025.

Liquidity risk

Liquidity risk reflects the possibility of incurring significant losses because of deteriorated financing conditions (financing risk) and/or of the sale of assets for less than their market value (market liquidity risk) to meet the funding needs arising from the Group's obligations.

The process of the Group's planning and budgeting covers the preparation of a Liquidity Plan to make sure that the growth of business will be supported by an appropriate liquidity financing structure and supervisory requirements in terms of quantitative liquidity measures will be met.

In 2025, the Group continued to be characterized by solid liquidity position. All the supervisory and internal liquidity indicators remained significantly above minimum limits in place. The steps taken as part of standard and binding risk management procedures have proved sufficient for managing liquidity in the current market environment. In 2025, in consequences of the increase of the deposits from Customers at the faster pace than loans, there was further improvement of the Group's Loan-to-Deposit ratio to 58 per cent at the end of December 2025 (comparing to level of 64 per cent as of end of December 2024).

The liquid assets portfolio is treated by the Group's as liquidity reserve, which will overcome crisis situations. This portfolio consists of liquid debt securities issued or guaranteed by Polish government, other EU's sovereigns, European Union, and multilateral development banks', supplemented by the cash and exposures to the National Bank of Poland. At the end of 2025, the share of liquid debt securities (including NBP Bills) in total securities portfolio amounted to 99.9% and allowed to reach the level of approx. PLN 70.1bn (45 per cent of total assets), whereas at the end of December 2024 was at the level of approx. PLN 53.9bn (39 per cent of total assets).

Main liquidity ratios	31.12.2025	31.12.2024
Loans/Deposits ratio (%)	58%	64%
Liquid assets portfolio (PLNmIn)*	70 354	53 646
Liquidity Coverage requirement, LCR (%)	402%	371%
Net Stable Funding Ratio, NSFR (%)	203%	196%
Long-term Funding Ratio, LTFR**	33%	28%

(*) Liquid Assets Portfolio: The sum of cash, nostro balance (reduced by the required obligatory reserve), unencumbered liquid securities portfolio, NBP-Bills and short-term, due from banks (up to 1 month); (**) Long-term Funding Ratio enters into force on Dec 31, 2026

Consequently, the large, diversified, and stable funding from retail, corporate and public sector Clients remains the main source of financing of the Group. At the end of 2025, the source of medium-term funding included subordinated debt, own EUR bonds issue and securitization of loan and leasing portfolios, as well as covered bonds issued by Millennium Bank Hipoteczny (mortgage bank).

In 2025, Millennium Mortgage Bank issued additional covered bonds (0.8 billion in March and 1 billion in November) and at the end of December 2025 total nominal of issued covered bonds by the Group reached the level of PLN 2.6 billion (PLN 0.8 billion at the end of December 2024).

The Group has also an excess of liquidity in foreign currencies (in particular in EUR and USD) which has increased in recent years due to the significant decrease of the CHF loan portfolio, the conversion of part of provisions for legal risk to CHF and the issue of two senior non-preferred bonds in a total amount of EUR 1 billion. Consequently, the management of FX liquidity is focused on efficient investment of the surplus and diversification of the risk, which has led to the creation of an investment portfolio in EUR, mostly concentrated in several western European countries sovereign debt in EUR. The estimation of the Group's liquidity risk is carried out both with the use of the ratios defined by the supervisory authorities and own indicators, for which exposure limits were also established.

According to the provisions of CRD /CRR package, the Group is calculating the liquidity coverage requirement (LCR) and the net stable funding ratio (NSFR). The regulatory minimum of 100% for both LCR and NSFR was complied by the Group. LCR improved substantially during 2025 and reached the level of 402% at the end of December 2025 (371% as of the end of December 2024). The increase was mainly connected with increase of deposit from retail Clients, which was invested in liquid assets portfolio. The measure is calculated daily and has been reported on the monthly basis to NBP since March 2014. Internally, the LCR is estimated daily and reported to the areas responsible for the management and control of the liquidity risk in the Group. NSFR is monitored and reported monthly. In 2025, the NSFR was above the supervisory minimum of 100% (supervisory minimum valid since June 2021). NSFR reached the level of 203% at the end of December 2025 (196% as of the end of December 2024). Moreover, in line with Recommendation WFD (issued in July 2024), the Group is calculating monthly Long Term Funding Ratio (LTFR/WFD), which in December 2025 reached 33% (28% in December 2024).

Additionally, the Group employs an internal structural liquidity analysis based on cumulative behaviour liquidity gaps. In 2025 all the liquidity gaps were maintained positive. The safe level adopted by the Group for the ratio of liquidity shortfall is established for each time bucket below 5 years at the level of 12 per cent of total assets.

Liquidity stress tests are performed at least quarterly, to understand the Group's liquidity-risk profile and to ensure that the Group can fulfil its obligations in the event of a liquidity crisis and to update the Liquidity Contingency Plan and management decisions. As of December 2025, the results of the stress test analysis demonstrated that liquidity position is not threatened as even in the most severe scenario the survival period is still significantly above the limit of 3 months.

The liquidity risk management process is regulated in the internal policy that is a subject of the Bank's Management Board approval.

The Group has also emergency procedures for situations of increased liquidity risk – the Liquidity Contingency Plan. The Liquidity Contingency Plan establishes the concepts, priorities, responsibilities, and specific measures to be taken in the event of a liquidity crisis. The Liquidity Contingency Plan is tested and revised at least once a year. The revised Plan was approved by the Supervisory Board in November 2025.

More information on liquidity risk management can be found in chapter 8.5 of the Annual Consolidated Report of the Bank Millennium S.A. Capital Group for the 12-month period ending 31st December 2025.

Operational risk

Operational risk management is based on the processes structure implemented in the Group and overlapping the traditional organizational structure. Current management of the specific processes, including the management of the profile of process operational risk, is entrusted to Process Owners, who report to all other units participating in the risk management process and are supported by these units.

To manage the fraud risk, the Group has in its structure a special organizational unit to develop, implement and monitor the Group's policy for management of this risk in cooperation with other organizational units of the Group and in accordance with its internal regulations. Fraud Risk Management Sub-unit in the Security Department is a centre of competence for the fraud prevention process.

Non-compliance risk

Lack of compliance of the Bank's operations with binding laws, internal regulations, and market standards is linked with the risk of legal and regulatory sanctions, material, or reputation losses. Therefore, it is one of the areas threatening the banking activity. By monitoring compliance with both internal and external regulations, Bank Millennium considers it to be particularly important:

- Preventing money laundering, financing of terrorism and sanction circumvention,
- Ensuring consistency of Bank Millennium's internal normative acts with binding laws as well as recommendations issued by supervisory authorities,
- Counteracting and managing conflicts of interest,
- Counteracting corruption,
- Observance of ethical principles,
- Monitoring personal transactions and protecting confidential information related to Bank Millennium, financial instruments issued by the Bank as well as information connected with purchase/sale of such instruments,
- Monitoring and ensuring compliance of products and services, including structured deposits, investment products and services covered by MiFID II Directive.

Bank Millennium undertakes appropriate actions for the purpose of ongoing and continuous tracking of changes occurring in binding legal regulations as well as recommendations and guidance given by supervisory authorities, both national as well as of the European Union. To ensure compliance of the Bank's operation with the applicable laws, the Compliance Department undertakes several activities such as:

- 1) informing about changes in law,
- 2) analysis of internal normative acts binding at the Bank in terms of compliance with applicable laws and standards,
- 3) analysing new products and services and changes in products and services,
- 4) measuring compliance risk in processes operating at the Bank,
- 5) participating in key implementation projects, and
- 6) staff training.

The Bank's operations may generate a conflict of interest between Bank's interests and the interests of Customers. The Bank's main principle is to take all reasonable steps to identify a conflict of interest between the Bank and its Customers, as well as between individual Customers, and to establish rules ensuring that such conflicts have no adverse impact on Customers' interests.

The Bank Millennium Group undertakes also appropriate actions to ensure conduct concerning personal transactions, which is compliant with standards and laws. These actions and measures are meant to, according to the circumstances, to restrict or prevent performance of personal transactions by relevant persons in situations, which may cause a conflict of interest or be involved with access to confidential information or to data about Customers' transactions.

Shares of Bank Millennium are admitted to public trading on the Warsaw Stock Exchange. Such status requires special attention and observance of the obligation to maintain highest standards for transparency of financial markets. The policy of Bank Millennium is to maintain strict control as regards protection of the flow of confidential information (including in accordance with the requirements of Regulation No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on abuses on the market abuse, MAR). The Bank prohibits the use and disclosure of confidential information in any form. Purchasing and selling by persons discharging managerial responsibilities, of the Bank's shares, debt instruments of the Bank or derivatives or other financial instruments linked to them is forbidden during closed periods.

The Anti-Money Laundering and Counter Terrorism Financing policy (AML/CTF), applied by the Bank Millennium, is a comprehensive system of identification of threats related to money laundering crimes.

Actions launched under this policy include in particular:

- application of financial security measures to Customers, depending on the degree of risk and based on „*Know your Client*” or (KYC) principle – the key concept of the program,
- transaction registration and reporting,
- identification of suspicious transactions,
- cooperation with the General Inspector of Financial Information.

Bank Millennium adjusts its reports to the analysis of suspected transactions on the on-going basis, considering up-to-date patterns (sectors, cash-flow routes, Customer behaviour) for effective identification and reporting of transactions suspected of money laundering. Implemented internal procedures, organizational solutions and employee training programmes ensure efficient operation of the policy.

In addition, Bank Millennium S.A. has a policy of applying financial sanctions, the purpose of which is to ensure compliance of the Bank's procedures and operations with regulatory and legal requirements, to protect the Bank's reputation and to define the principles and rules for limiting business contacts with countries, legal entities and natural persons that are subject to financial sanctions imposed by, among others, in the Republic of Poland (Poland), the European Union ("EU"), the United States of America ("USA") The Office of Foreign Assets Control of the U.S. Treasury Department ("OFAC"), the United Nations ("UN"), and the United Kingdom (UK) through OFSI (Financial Sanctions Enforcement Office).

The Policy also sets out detailed rules for dealing with Clients, payments and transactions in the scope of sanctions of Poland, EU, USA, UN, UK, risk assessment, management of Sanctions Lists, as well as the occurrence of links with sanctioned countries, and is aimed at excluding the possibility of the Bank taking actions contrary to domestic and international financial sanctions.

Bank Millennium, with view to protecting Customers who invest their funds in investment products with varied degree of risk, strictly monitors compliance of these products, their offering and handling process with relevant internal regulations, laws, and external guidelines – on the domestic and European Union level. A specific compliance monitoring programme also covers consumer loans and insurance products (including insurance–investment products) addressed to consumers.

The Bank Millennium has mechanisms and internal regulations allowing for anonymous and non-anonymous reporting of violations of law and internal regulations and ethical standards (the so-called whistleblowing) to the Chairman of the Management Board, and in the case of notification concerning a Member of the Management Board - to the Supervisory Board. The Bank Millennium will verify each application, ensuring that the reporting person will be protected by acts of repressive, discriminatory, and unfair nature.

12. Human resources management

12.1 Human resources (HR) policy

The *Human Resources (HR)* policy is based on the mission and values of Bank Millennium and defines the framework for the functioning of the HR area in the Bank Millennium Group, referring to both the HR management model and the regulations that constitute the legal basis for the HR management system in the Bank Millennium Group.

The *HR Policy* defines the main areas of HR activities, such as recruitment and onboarding, remuneration and benefits, training and development, leadership, employee opinion surveys, digitalisation of processes and HR data analysis, defines objectives in these areas that result from the Bank Millennium Group's strategy and HR itself, and refers to the ambitions and aspirations that HR is guided by.

The HR Strategy is based on the assumptions of the *HR Policy* and is also part of Bank Millennium's **business strategy "Growth and Value"**, which was announced for 2025-2028, constituting an important element supporting its implementation. The strategic objectives of HR for the strategic period are:

1. Support for business lines, primarily corporate and small businesses, in the form of recruitment, ensuring effective onboarding, training and development, and continuing extensive development activities for retail banking employees;
2. Active work on employee satisfaction and increasingly better results of Top Employer certification to ensure that Bank Millennium is considered the possibly best place to work;
3. An active remuneration policy to ensure employee retention, job satisfaction and to enable the recruitment of new people to Bank Millennium;
4. Supporting activities in the area of organisational culture, which should be conducive to the implementation of the Bank strategy;
5. Digitalisation of HR processes and increasingly better implementation of HR services.

HR policy means strategic activities in the field of human resources management support the business needs of the Bank Millennium Group in order to create a friendly, development-oriented and safe workplace.

Friendly workplace

Bank Millennium creates a good working environment for employees regardless of gender, age, race, religion, nationality, ethnic origin, disability, political beliefs, trade union membership and sexual orientation, who find here conditions for professional development in an atmosphere of cooperation and mutual respect.

Therefore, in 2025 Bank Millennium became the winner of a number of awards, which can be found in chapter 10 of this report. The Bank was recognised for its activities for the benefit of employees, responsible management, supporting diversity and sustainable development.

Bank and Bank Millennium Group also reward their employees.

In 2025, the **IMPAKT Employee Rewards Program**, in which employees reward their colleagues, was continued. The program integrates the community, builds a culture of cooperation and mutual appreciation. In 2025, 53 employees were awarded for their commitment, quality improvement, innovative solutions and taking on challenges that inspire others.

The best employees and managers are given **the Chairman's Awards** for above-average professional achievements once a year. In 2025, they were distributed to 17 employees from the head office and sales network.

Competence development

The Bank continued to implement extensive **training programs for business lines**, in particular those that enable both *on-boarding* of new employees and ensure their development during their work in the organisation. The trainings were addressed in particular to employees of retail and franchise networks, direct banking employees, corporate banking advisors, those from affluent customer banking and people involved in the sale of insurance products. They covered a wide variety of issues necessary for the effective performance of tasks, in particular issues related to sales techniques, customer service models and knowledge of the Bank's products and systems.

The development of managers is carried out on many levels.

Consistently, for several years, the **M#leaders leadership skills development program has been implemented**. The programme is based on the John Maxwell methodology used in the Bank Millennium Group and includes several dozen hours of workshops at the basic and advanced levels.

The second development program for head office managers is the FPL Management Masterclass. The content of the program was entirely based on analyses of leadership styles of global business leaders.

Managers also develop their competences by using **access to the Youniversity streaming service**, which gives access to knowledge in dozens of thematic areas important in management.

Individual development needs are met through **access to the Coachhub coaching** platform. As part of individual meetings, managers can identify and select areas for development, and then - with the help of a certified coach - achieve the set goals. The programme is carried out online. Thanks to this, you can develop anywhere and at any time preferred by the employee.

People entering the managerial path use a solution focused on **learning basic and intermediate managerial tools**. The process consists of a diverse set of development activities – from a group development session, through an advanced competence diagnosis, implementation of skills in practice and many weeks of support from a mentor experienced in business.

A separate **managerial certification program**, supporting managers of retail outlets, is implemented in retail banking.

The Bank ran a programme of lectures as part of Development Fridays, which was highly appreciated by its employees. The purpose of the **"Development Fridays"** programme is to support the sharing of knowledge and experience of employees. The speakers are specialists of the Bank Millennium Group and the proposal to participate in the programme is addressed to all employees. Lectures are conducted online, recordings with additional materials are made available on the training platform and on the "Millennium World" intranet.

Another program is the Millennium Campus. Knowledge and competence development program at Bank Millennium, the aim of which is to support innovation in our organization. Millennium Campus is a place where science meets business. We invite external speakers to cooperate. The offer of participation in the program is addressed to all employees of the Bank. Lectures are conducted online, recordings with additional materials are made available on the training platform and on the intranet "Świat Millennium".

The Bank Millennium Group also supports the development of employees through **a wide range of e-learning courses**. The bank uses a specialized platform that allows it to manage both the content and the course of training processes.

Diversity policy

When implementing **the Diversity Policy**, the Bank operates with respect for human dignity and observes the right to equal treatment regardless of age, gender, ethnic and national origin, religion, denomination, family status, sexual orientation, health condition, beliefs, trade union membership and other premises exposing to discriminatory behaviour. The Bank is also a signatory of the **Diversity Charter**, which is a commitment signed by organisations that decide to prohibit discrimination in the workplace and work to create and promote diversity. Respect for diversity in the Bank Group is also regulated by the **Code of Ethics**, the **Work Regulations** and recruitment regulations. The implementation of these policies has resulted in a number of actions:

All employees undergo **mandatory training on ethical issues**. In addition, **the managerial staff is trained in counteracting mobbing and discrimination** in employment. The Bank has **anti-mobbing and anti-discrimination procedures in place**. There is a system for reporting abuse, which is independent of the hierarchy.

When recruiting employees, criteria exposing them to discriminatory behaviour are not applied. These rules also apply to termination of employment, terms of employment, promotion and access to training to improve professional qualifications. Candidates are selected on the basis of objective criteria, such as, in particular: education, professional experience, general and specific competences, knowledge of foreign languages and general fit to the profile.

The Bank analyses the remuneration structure and **equality in access to earnings** and positions on an ongoing basis due to gender, age and nationality. Periodically, interviews are conducted with people leaving the Bank to determine the reasons for leaving.

Benefits such as medical care, group insurance, co-financing of sports and recreation, and culture are offered to all employees, including those who work part-time. Employees are provided with a "cafeteria where they have access to a wide range of benefits." The bank encourages employees to use up their holidays.

The Bank supports people in a difficult financial and health situation through the existing social assistance system based on the Company Social Benefits Fund.

Persons with disabilities can use office infrastructure adapted to their abilities.

The Bank regularly conducts **managerial training** aimed at strengthening appropriate attitudes – including overcoming stereotypes and promoting openness to diverse beliefs of employees and shaping their own and subordinate responsibility.

Employees have the opportunity to freely **present their opinions** on internal Internet forums.

The Bank conducted training for managerial staff on managing a multigenerational team.

The Bank conducts development initiatives available to all employees. **"Diversity is OK!"** It is an initiative that supports diversity. Regular meetings are organised with speakers who are specialists, scientists, and public figures to educate employees in the field of multigenerationality, cultural differences, disability, gender identity, gender equality, levelling the pay gap, and neurodiversity. Such activities allow for a better understanding of diversity, noticing different points of view, creating a synergy effect from differences and looking for non-standard solutions for both employees and customers to level the playing field and create more opportunities. Recordings and meeting materials are available to employees in the internal training platform and in the Millennium World, on a separate intranet website. Bank Millennium participated in the Diversity in Check survey organized by the non-governmental organization Forum for Responsible Business and was included on the list of employers most advanced in diversity and inclusion management in Poland.

The me zone is a separate space on the Intranet that was created to take care of the well-being of employees. The website with recordings and materials as well as activities are available to all employees. In addition to webinars on health and building mental resilience, taking into account the life stages of women and men in social and professional roles. The bank organized the "Time for Health" campaign, which lasted for a month. The campaign focused on the prevention of nervous system health.

Employees could take advantage of laboratory tests and a series of webinars devoted to coping with stress and emotions, building mental resilience. Last year, we implemented initiatives focused on oncological prevention

In addition, we have implemented a wellbeing platform for all employees, offering mental health support through consultations with psychologists, wide access to psychological materials, and support for the development of professional competencies in communication, leadership and diversity. The platform supports both professional and personal needs, and every employee can use it at any time, responding to their individual needs.

The Bank allows the use of tickets to selected amusement parks for employees and their children during the summer and Christmas holidays. Campaigns of this type are aimed at inspiring employees to **spend time together with their loved ones**. The Bank promotes and encourages volunteering activities. For the 12th time, the **Christmas Charity Auction was organized**, during which people employed at Bank Millennium put up among others hand-made items for auction. PLN 68,193.13 was collected, and by the decision of the Management Board of Bank Millennium this amount was doubled and divided equally among all beneficiaries of Bank Millennium.

As a large entity within the meaning of Article 3(1)(1d) of the Accounting Act, the Bank applies a *diversity policy* to its administrative, management and supervisory bodies, in particular with regard to gender, age, disability, education and professional experience. The diversity policy aims, among other things, to ensure a balanced and inclusive composition of the Bank's bodies, which reflects social diversity and supports decision-making based on a broad spectrum of competences and experience. The Bank constantly strives to increase the participation of women in management and supervisory bodies, ensure the representation of different age groups, take into account people with different education and professional experience, promote equal treatment and counteract discrimination.

The *diversity policy* is implemented by taking diversity criteria into account in the nomination and recruitment processes for the Bank's bodies, applying the principles of equal opportunities in human resources policies, conducting educational and promotional activities promoting inclusiveness, and monitoring the composition of bodies for compliance with the policy's objectives.

At Bank Millennium, women make up the majority of employees - 64%. Their share in the Bank's management team (starting from the position of branch manager) was about 53%. Although the share of women in senior management has been steadily increasing in recent years, they are still under-represented and account for 34% of this group.

The Bank's strategy, including, for example, building units to serve foreigners working in Poland, also serves to increase the diversity of employees in terms of nationality: in 2025, 52 foreigners were employed.

The age structure of employees is relatively balanced, with people both entering the labour market and people at the end of their professional careers being employed. The largest group of employees are people between 30 and 50 years of age – almost 65%. Young people up to 30 years of age - 19%.

In connection with the long-term development strategy, the Bank will strive to further take into account diversity in terms of competences and professional experience of employees in *its human resources management policy*.

In 2025, the Bank continued its efforts to promote diversity in the composition of its bodies. The composition of the Supervisory and Management Boards includes people representing different age groups, with diverse education and professional experience. The proportion of women on the supervisory and management bodies is at 42%, in line with *the policy*.

12.2 Employment and personnel costs

Effectiveness of human resources management is an important element of the Bank Millennium Group's strategy. The Group monitors both individual personnel cost items and the level of FTEs, and for several years has been pursuing a policy of stable employment. Employee turnover is monitored and reported on an ongoing basis. Employment levels and resource efficiency are verified against relevant market benchmarks.

Employment (full-time)	in	the	Group	31.12.2025	31.12.2024	Change (y/y)
Number of the Bank employees				6 621	6 450	171
- including key positions				175	171	4
Subsidiaries				285	264	22
Total Bank Group				6 906	6 714	192

Employment in the Bank Millennium Group at the end of 2025 reached 6,906 FTEs, which means a increase by 192 FTEs (i.e. 2.8%) compared to the end of 2024. The largest employer in the Group is Bank Millennium, employing 6,621 FTEs at the end of 2025. At the end of the year, Bank Millennium Group subsidiaries employed a total of 285 FTEs, of which the most important were Millennium Leasing, Millennium TFI and Millennium Bank Hipoteczny.

Employment (full-time)	in	the	Bank	31.12.2025	31.12.2024	Change (y/y)
Branches and direct sales				3 830	3 806	24
Head office				2 791	2 644	146
Total Bank Millennium				6 621	6 450	171

The employment structure of Bank Millennium shows a definite predominance of people employed directly in the sale of banking products and services, including primarily in the network of the Bank's branches located throughout the country.

Employment (full-time)	in	the	Bank	31.12.2025	31.12.2024	Change (y/y)
Direct banking				844	801	42
Digital technologies				783	700	83
Retail and corporate banking				2 986	3 004	-18
Support units				2 008	1 945	63
Total Bank Millennium				6 621	6 450	171

The remuneration policy of the Bank Millennium Group is aimed at ensuring that the remuneration of employees is adequate to the current tasks, competences and responsibilities. In particular, great importance is attached to the proper formation of the basic salary. On the basis of internal reports, the Bank assesses and verifies the level of remuneration in relation to specific categories of employees. We are committed to ensuring consistency in the remuneration system and maintaining a balance in the way employees who perform the same work or work of the same value are remunerated. Salary levels are verified taking into account periodic performance assessments and possible evolution of the level of skills involved in the implementation of the organisation's tasks. The analyses also take into account salary benchmarks on the financial market.

The total level of personnel costs in the Bank Millennium Group in 2025 and the previous year was as follows:

Personnel <i>(in PLN million)</i>	costs	2025	2024	Change (y/y)
Bank Millennium		1 290.2	1 138.0	13.4%
Subsidiaries		66.2	58.8	12.5%
Total Bank Millennium Group		1 356.4	1 196.9	13.3%

12.3 Remuneration policy

The Bank Millennium Group has in place the *"Employee Remuneration Policy in the Bank Millennium Group"*, which formulates the assumptions used in shaping the components of fixed and variable remuneration for all employees of the Group.

According to *the policy*, the main source of income for employees is the basic salary resulting from employment contracts. Variable remuneration is an additional, motivational element of the total remuneration. The basic salary of an employee is determined in relation to the tasks performed in a given organisational unit, the scope of responsibility, qualifications, impact on the company's risk profile and on the basis of the analysis of salary information presented in salary surveys on the financial market.

The Bank conducts periodic reviews of salaries and positions. The Bank's Management Board may decide to allocate a pool of funds to be used to change the base salaries of employees, after assessing the Group's financial condition and business environment, including current reports on remuneration levels in the financial sector.

Individual pay rates are verified taking into account periodic assessment of work performance, the scope of the employee's tasks and skills. The gender pay gap is also being analysed, taking into account the differences in the level of pay between men and women in similar positions.

Variable remuneration is shaped as part of various bonus systems, the purpose of which is to motivate employees to achieve business and organisational goals. Bonus systems and periodic evaluation criteria in the Bank Millennium Group are tailored to the specific nature of employees' activities in individual areas of the Group. The amount of bonus budgets granted for bonus payments is determined after an analysis of capital and liquidity ratios and depending on the degree of achievement of Bank Millennium's operating results. In the case of employees of business lines, budgets can also be linked to the achievement of the goals of individual lines. It is assumed that individual bonuses cannot exceed 100% of the employee's total annual basic salary. Individual bonuses are granted from the pool allocated for the variable remuneration based on the assessment of the quality of work and the degree of commitment to achieving the goals set for employees.

The Bank Millennium Group attaches great importance to the proper formation of remuneration of employees who have a significant impact on the Group's business profile (*Risk Takers*). The rules for granting variable remuneration to Members of the Management Board of Bank Millennium and other *Risk Takers* are included in the *"Remuneration policy with respect to Risk Takers in the Bank Millennium SA Group"*. *The policy* is reviewed annually.

The bonus pool for *Risk Takers* is determined after a prior analysis of the Bank's situation in terms of:

- results of the Bank Millennium Group,
- the level of the capital adequacy ratio at the individual and consolidated level,
- the level of risk ratios relating to the liquidity of the Bank Millennium Group.

Performance evaluation includes financial and non-financial criteria and takes place over a period of at least three years.

Rules applicable to the payment of variable remuneration paid in 2025 for 2024:

Risk Takers - Members of the Management Board of Bank Millennium (Risk Takers I)

50% of the value of variable remuneration components is awarded and paid after the end of the settlement period and after the announcement of financial results (the non-deferred part). The payment of the remaining 50% of the variable remuneration is deferred for 5 years, payable after re-evaluation in equal annual instalments. Members of the Management Board will receive each part of the bonus granted (both non-deferred and deferred) a half in cash and half in the form of financial instruments. The part of the bonus paid in the form of financial instruments is retained for 12 months.

Other Risk Takers (non-Management Board) (Risk Takers II)

60% of the value of variable components of remuneration for the previous year is awarded and paid after the end of the settlement period. The payment of the remaining 40% of the variable remuneration is deferred for 5 years, payable after re-evaluation, in equal annual instalments. The 50% of the variable remuneration is, as a rule, paid in the form of financial instruments. Part of the bonus paid in the form of financial instruments is subject to retention for 12 months.

The Personnel Committee of the Bank's Management Board, in cases when the bonus amount set for a Risk Taker II for a given calendar year does not exceed the equivalent of EUR 50,000 and 1/3 of the total annual salary, may decide to pay the bonus in full in cash without the application of the deferral mechanism.

As part of the bonus programme for Risk Takers II for 2024, in 2025 bonuses were awarded in full in cash without the application of the deferral mechanism.

Remuneration of the Management Board

Determining the terms of contracts and remuneration for Members of the Management Board is the competence of the Supervisory Board, taking into account the recommendations of the Personnel Committee of the Supervisory Board responsible for supervising *the remuneration policy*. The framework for remunerating Members of the Management Board and the Supervisory Board is defined in the "*Remuneration Policy with regard to Members of the Management Board and Supervisory Board of Bank Millennium SA*" adopted by the General Meeting of Shareholders.

The policy is one of the tools for the implementation of the Bank's business strategy, long-term interests and stability, supporting proper and effective risk management and mitigation of conflicts of interest, in particular by:

- a) shaping the appropriate level of individual components of remuneration in relation to the function performed and the scale of the Bank's operations, taking into account the transparency of the rules for their creation,
- b) making part of the remuneration of Management Board Members dependent on the Bank's financial and business results,
- c) adopting such a structure of fixed and variable remuneration components of Management Board Members that the motivation directed at obtaining variable remuneration is not a factor conducive to excessive risk-taking,
- d) supporting responsible management attitudes in relation to the Bank's long-term business objectives through a transparent process of evaluation of the Bank's Management Board Members.

The total remuneration of the Management Board Members consists of a fixed and a variable part. The variable part of the remuneration may be an annual bonus, which depends on the Bank's result, the result compared to banks of similar size and the assessment of the Management.

Decisions on granting bonuses to Management Board Members are made after an analysis of risk, liquidity and capital ratios, taking into account the following financial criteria:

- implementation of planned budgets and indicators established for the managed area of activity,
- comparison with competing banks of similar size (peer banks),
- the market criteria established for the period;

and non-financial criteria, in particular:

- the overall quality of management in the area of responsibility,
- effective leadership and contribution to the Bank's development,
- management and supervision of units in the area of responsibility.

The total value of base salaries of Management Board Members for performing this function in 2025 amounted to PLN 11,046 thousand PLN. In addition, the Management Board Members received payment of part of the annual bonus for 2021, 2022, 2023 and 2024 (in cash and own shares) and additional benefits.

Fixed remuneration (basic salary and benefits) of Management Board Members in 2025 (in PLN thousand)

Name and surname	Basic salary	Medical	ECPs	Additional benefits*
Joao Bras Jorge	2 622.00	30.09	115.51	1 048.61
Fernando Bicho	1 863.00	30.04	95.12	47.32
Wojciech Haase	1 484.13	15.98	0.00	0.00
Antonio Pinto Junior	1 518.00	4.60	95.53	777.61
Jarosław Hermann	1 518.00	12.30	76.14	0.00
Halina Karpińska	889.31	0.30	14.09	0.00
Magdalena Zmitrowicz	1 151.41	3.45	11.65	268.14
In total:	11 045.85	96.76	408.02	2 141.68

(*) Additional benefits are mainly related to the costs of stay of foreign Members of the Management Board

Members of the Management Board who served until 27 March 2025

Name and surname	Basic salary	Additional benefits	Compensation - non-competition clause
Andrzej Gliński	457.84	30.09	1 138.50
Wojciech Rybak	477.92	48.57	1 138.50
In total:	935.76	78.67	2 277.00

Variable remuneration transferred in 2025 to Members of the Management Board:

Name and surname	Bonuses paid for the years: 2021, 2022, 2023 and 2024 (in PLN thousand)	
	<i>in cash</i>	<i>in own shares</i>
Joao Bras Jorge	945.26	1 198.59
Fernando Bicho	653.51	825.20
Wojciech Haase	533.19	673.39
Antonio Pinto Junior	533.19	673.39
Jarosław Hermann	533.19	673.39
Halina Karpińska	n.a.	n.a.
Magdalena Zmitrowicz	n.a.	n.a.
In total:	3 198.33	4 043.98

Members of the Management Board who served until 27 March 2025

Name and surname	Bonuses paid for the years: 2021, 2022, 2023 and 2024 (in PLN thousand)	
	<i>in cash</i>	<i>in own shares</i>
Andrzej Gliński	502.83	643.04
Wojciech Rybak	502.83	643.04
In total:	1 005.65	1 286.08

Severance payments granted to Management Board members in office until 27 March 2025

Name and surname	Severance paid	
	<i>in cash</i>	<i>In Phantom shares</i>
Andrzej Gliński	379.50	379.50
Wojciech Rybak	379.50	379.50
In total:	759.00	759.00

The decision to grant variable remuneration to Management Board Members for 2025 will be made after the Bank's results are approved by the General Meeting of Shareholders.

Members of the Supervisory Board receive only fixed remuneration for work in Boards and Committees, which is adequate to their function and the scale of operations of the Bank Millennium Group.

Policy evaluation

In its annual assessment of the functioning of Bank Millennium S.A.'s *remuneration policy*, the Supervisory Board assessed that it was conducted in a stable manner, based on the continuation of the adopted strategies. The measures taken in 2025 to adapt to the challenges arising from the current business context of the remuneration policy were positively assessed.

Employee share plan

The Bank runs an incentive programme (the “Programme”) for selected key employees of the Bank (hereinafter referred to as “Participants”) identified as having a significant impact on the risk profile.

Programme Participants may purchase Bank shares on the market on the basis of instructions submitted to an investment firm selected by the Bank for the purposes of the Programme, using funds provided for this purpose by the Bank from capital created by the Bank.

The Shares acquired by Risk Takers will constitute a component of variable remuneration, in accordance with the rules on the remuneration of Risk Takers applicable at the Bank during the term of the Incentive Programme.

Instructions from Programme Participants may be submitted within the limits of the bonus awarded in the form of a financial instrument, based on the decision of the authorised bodies specified in the Programme rules approved by the Supervisory Board.

Under the Incentive Programme, deferred financial instruments granted prior to the duration of the Programme may be paid out, for which the vesting period will take place during the duration of the Programme. Shares are converted at an exchange ratio of one Own Share for one Phantom Share.

The programme was introduced by the General Meeting of Shareholders at its meeting on 27 March 2025 and has been in effect since 1 April 2025. until the end of 31 December 2029 for the non-deferred portion of variable remuneration, and until the end of 31 December 2034 for the deferred portion of variable remuneration.

13. Principle of corporate governance at Bank Millennium

13.1 Statement on the principles of corporate governance applied in 2025

Corporate governance is a set of rules addressed to governing bodies of companies and their members as well as defining relations with shareholders and investors.

The set of rules covering the area of Polish financial institutions and companies listed on the Warsaw Stock Exchange (GPW) are in particular 'Best Practice for GPW Listed Companies' (hereinafter referred to also as '**Best Practice**') adopted by the Board of the Warsaw Stock Exchange, the 'Principles of Corporate Governance for Supervised Institutions' (hereinafter referred to as the '**Principles**') adopted by the Polish Financial Supervision Authority and Recommendation Z adopted by the Polish Financial Supervision Authority (hereinafter referred to as the "**Recommendation Z**").

The application of corporate governance principles guarantees the transparency of company operations and strengthens the protection of shareholder rights, also with respect to issues not regulated by generally applicable laws.

The most important standard of the above-mentioned Best Practice and Principles is the '*comply or explain*' rule. This rule means that a company is obliged to apply the principles stipulated in the document, and in the event of deviation from use of a particular principle the company must clarify the causes of such conduct and make this fact publicly known in the form of a report by using the GPW Electronic Information Database (in the case of Best) or by means of a website (in the case of the Principles).

The Bank, as a publicly traded company, is subject to the following from 2021. Best Practice, published on the GPW's website at: www.gpw.pl/pub/GPW/pdf/DPSN_2021.pdf. As in previous years, the Bank has complied with the principles of the Best Practice. The Bank's Supervisory Board's assessment of the application of the Best Practice on 6th February 2026 is confirmation of its compliance. The results of this assessment indicate that the Bank properly implemented the requirements formulated in the Best Practice in 2025 and that the solutions and mechanisms applied in the Bank for the implementation and execution of the Best Practice duly met the objectives of the regulations in conjunction with the needs of optimal organisation of the Bank's operations.

The Bank, as a financial institution, has also been subject to the Principles since the beginning of 2015, which are available on the KNF's website at: www.knf.gov.pl/dla_rynku/regulacje_i_praktyka/zasady_ladu_korporacyjnego?articleId=48880&p_id=1.8. As in previous years, the Bank has complied with the guidelines described in the Principles, except for the obligation under para. 16 the obligation to conduct the Bank's Management Board meetings in Polish. The knowledge of the English language by the members of the Bank's Management Board allows for complete mutual understanding and an appropriate level of communication during the meetings. Confirmation of their compliance is provided by the evaluation of the application of the Principles carried out by the Bank's Supervisory Board on 6th February 2026. The results of this assessment indicate that the Bank has adequately implemented the requirements formulated in the Principles in 2025 and that the solutions and mechanisms used in the Bank to implement and carry out the Principles duly take into account the objectives included in the regulation in conjunction with the needs of optimal organisation of the Bank's activities.

The Bank since 2022 is also subject to the internal governance requirements formulated by the KNF in Recommendation Z. The document is available on the KNF's website at: [Recommendation Z_70998.pdf](http://www.knf.gov.pl/dla_rynku/regulacje_i_praktyka/zasady_ladu_korporacyjnego?articleId=70998). As in previous years, the Bank complied with the guidelines described in Recommendation Z. The Bank's compliance with them is confirmed by: the positive assessment of the scope of application of the internal governance principles at the Bank made by the Bank's Management Board on 28th January 2026 and on 6 February 2026 by the Supervisory Board of the Bank the recognition by this bodies that the solutions and mechanisms applied at the Bank to implement and implement Recommendation Z, duly met the objectives of the regulation in conjunction with the needs of optimal organisation of the Bank's activities, including in terms of adjusting the Bank's internal governance to the changing internal situation and environment.

In subsequent years, the GMS adopted the assessment of the manner in which the obligations arising from the application of the Best Practice were fulfilled, as included in the Report on the activities of the Bank's Supervisory Board.

The Bank, as a large entity within the meaning of Article 3(1)(1d) of the Accounting Act, conducts and applies a diversity policy towards the administrative, management and supervisory bodies of the issuer. *This policy* covers gender, age, disability, educational and professional experience and aims to ensure a balanced and inclusive composition of the Bank's governing bodies, reflecting social diversity and supporting decision-making based on a wide range of competences and experiences.

A detailed description of *this policy*, along with its objectives, method of implementation and effects in a given reporting period, is provided in Part I of the Management Board's Report in Chapter 12 "Human Resources Management".

13.2 Shareholders and General Meetings of Shareholders

The General Meeting is the highest governing body of the Bank's operating in particular on the basis of the Code of Commercial Companies and the Banking Law, as well as the Bank's internal regulations, i.e. the Articles of Association and the Regulations of the General Meeting. The Bank's Articles of Association and Regulations of the General Meeting are available from the Bank's website on the tab: "About the Bank > Corporate bodies and governance", link to website www.bankmillennium.pl/about-the-bank/corporate-bodies-and-governance.

These documents describe in detail the functioning of the General Meeting and scope of its competencies as well as specific rights of the shareholders during the deliberations of a General Meeting. The competencies of the General Meeting include inter alia making amendments to the Articles of Association, including change in the amount of the share capital.

As at 31 December 2025, the Bank's share capital was PLN 1,213,116,777 and was divided into 1,213,116,777 shares with the nominal value of PLN 1 each. Information is presented below, in accordance with the data held by the Bank, on shareholders holding, directly or indirectly, significant blocks of shares, together with an indication of the number of shares held by these entities, their share in the share capital and in the total number of votes at the General Meeting of the Bank. According to the information available to the Bank, with respect to shareholders holding more than 5% of votes at the General Meeting, as at 31 December 2025, the following entities were the Bank's shareholders:

Banco Comercial Portugues (BCP), one of the largest private Portuguese bank – as the strategic investor - holds 50.10% of all the shares of the Bank. The Bank's significant shareholders are also: Nationale-Nederlanden Otwarty Fundusz Emerytalny, which held 9.72% of the Bank's shares and Allianz Polska Otwarty Fundusz Emerytalny which held 8.09% of the Bank's shares.

The remaining shares, i.e. 32.09% of the share capital, are dispersed among Polish and foreign shareholders, both institutional and private.

Shareholders of the Bank as at 31 December 2025

Shareholders	Number of shares	% stake in share capital	Number of votes	% participation in votes at GM
Banco Comercial Portugues S.A.	607 771 505	50.10	607 771 505	50.10
Nationale-Nederlanden Otwarty Fundusz Emerytalny	117 925 289	9.72	117 925 289	9.72
Allianz Polska Otwarty Fundusz Emerytalny	98 182 510	8.09	98 182 510	8.09

Shareholders of the Bank as at 31 December 2024

Shareholders	Number of shares	% stake in share capital	Number of votes	% participation in votes at GM
Banco Comercial Portugues S.A.	607 771 505	50.10	607 771 505	50.10
Nationale-Nederlanden Otwarty Fundusz Emerytalny	112 638 286	9.29	112 638 286	9.29
Allianz Polska Otwarty Fundusz Emerytalny	108 832 510	8.97	108 832 510	8.97
Otwarty Fundusz Emerytalny PZU „Złota Jesień”	65 599 757	5.41	65 599 757	5.41

Data in the tables were ascertained according to the rules described below. With respect to Banco Comercial Portugues S.A. these are data collected in connection with the registration of shareholders authorised entitled to take part in the Bank's Ordinary General Meeting convened for 27 March 2024 and 30 March 2023.

However, as regards Nationale-Nederlanden Otwarty Fundusz Emerytalny and Allianz Polska Otwarty Fundusz Emerytalny the number of shares and their stake in the Bank's share capital were calculated on the basis of the Annual Structure of Assets of the above-mentioned Funds as at 31 December 2025 and 31 December 2024 (as published on the websites, respectively: www.nn.pl, www.allianz.pl). With regard to the calculations made on the basis of the annual structures of the above-mentioned Funds, the volume-weighted average price (VWAP) of the Bank's shares was assumed: for 2024 in the amount 8.9290, and for 2025 in the amount of PLN 16,6554.

Banco Comercial Portugues S.A., as the majority shareholder, exercises a shareholder's rights specified in the Code of Commercial Companies and in the Bank's Articles of Association. BCP is a dominate entity with regard to the Bank. By holding a majority of votes at a General Meeting it can exercise decisive influence on GMS over decisions regarding the most important corporate matters such as change of the Bank's Articles of Association, issue of new shares of the Bank, reduction of the share capital of the Bank, issue of convertible bonds, payment of a dividend and other activities, which in accordance with Code of Commercial Companies require majority of votes at a General Meeting. BCP also holds a sufficient number of votes to appoint all members of the Supervisory Board, which in turn appoints members of the Management Board. In connection with the above-mentioned corporate rights BCP has the capacity to exercise significant control over the Bank.

The Bank is not aware of any agreements concluded between its shareholders regarding their mutual cooperation and the Bank is not aware of any agreements that, in future, might cause changes in the proportions of shares held by existing shareholders.

The Bank's shareholders exercise their corporate rights in the way and within the limits defined by generally applicable laws, the Articles of Association of the Bank, as well as the By-laws of the General Meeting of Shareholders. Each share of the Bank entitles to one vote, however registered founder shares in the outstanding number of 61,600 items are preferential in as much as one share entitles to two votes at a General Meeting. Registered founder shares in total accounted for 0.0051% of the Bank's share capital and 0.0102% of the total number of votes at a General Meeting, as at 31 December 2025.

Registered founder shares are subject to disposal restrictions, i.e. their disposal subject to the consent of, at least, three fourths of the founders, to other founders does not result in their loss of preferential status. A disposal of registered founder shares in all other cases causes loss of their preferential status. There are no restrictions on exercising voting rights under the Bank's shares and none of the holders of securities issued by the Bank has any special controlling rights with respect to the Bank.

Bank Millennium shares have been listed on the Warsaw Stock Exchange since 13 August 1992 (first bank to be listed). Currently 1 213 017 297 shares with the code ISIN PLBIG0000016 (GPW symbol: MIL; Reuters: MILP.WA; Bloomberg: MIL PW) are traded on the stock exchange.

Shareholders have 99 480 registered shares, of which 61,600 are preferential founder shares (right to two votes at a General Meeting). Thus, the total number of Bank Millennium shares is 1,213,116,777 and total number of votes at a General Meeting of Shareholders is 1,213,178,377.

13.3 Supervisory Board

The Supervisory Board exercises constant supervision over the activity of the Bank operating under legal regulations, including the Articles of Association of the Bank, resolutions of the General Meeting as well as the Bylaws of the Supervisory Board available from the Bank's website on the *"About the Bank > Corporate bodies and governance"* tab, link to website www.bankmillennium.pl/about-the-bank/corporate-bodies-and-governance.

Meetings of the Supervisory Board are convoked once a quarter and if such need arises. The competences of the Supervisory Board comprise, in particular, the appointment and recalling of Members of the Management Board (by a simple majority of votes) and determination of their remuneration principles. Resolutions are adopted by a simple majority of votes with at least half of its members present. In the case of an equal number of votes the Chairman of the Supervisory Board has a decisive vote.

The Supervisory Board of the Bank consists of at least five Members, of whom at least a half, including the Chairman, are of Polish nationality. Members of the Supervisory Board are appointed at a General Meeting for a three-year term of office.

The composition of the Supervisory Board between 1 January 2025 and 27 March 2025 was as follows:

- Bogusław Kott – Chairman of the Supervisory Board,
- Nuno Manuel da Silva Amado – Deputy Chairman of the Supervisory Board,
- Dariusz Rosati – Deputy Chairman and Secretary of the Supervisory Board,
- Miguel de Campos Pereira de Bragança – Member of the Supervisory Board,
- Olga Grygier-Siddons – Member of the Supervisory Board,
- Anna Jakubowski – Member of the Supervisory Board,
- Grzegorz Jędryś – Member of the Supervisory Board,
- Alojzy Nowak – Member of the Supervisory Board,
- José Miguel Bensliman Schorcht da Silva Pessanha – Member of the Supervisory Board,
- Miguel Maya Dias Pinheiro – Member of the Supervisory Board,
- Beata Stelmach – Member of the Supervisory Board,
- Lingjiang Xu – Member of the Supervisory Board.

The composition of the Supervisory Board between 27 March 2025 and 31 December 2025 was as follows:

- Olga Grygier-Siddons - Chairperson of the Supervisory Board (Independent member)
- Nuno Manuel da Silva Amado - Deputy Chairman of the Supervisory Board
- Katarzyna Sułkowska - Secretary of the Supervisory Board (Independent member)
- Małgorzata Bonikowska - Member of the Supervisory Board (Independent member)
- Miguel de Campos Pereira de Bragança - Member of the Supervisory Board
- Agnieszka Kłos-Siddiqui - Member of the Supervisory Board (Independent member)
- Anna Mankiewicz-Rębkowska - Member of the Supervisory Board (Independent member)
- Alojzy Nowak - Member of the Supervisory Board (Independent member)
- Izabela Olszewska - Member of the Supervisory Board (Independent member)
- José Miguel Bensliman Schorcht da Silva Pessanha - Member of the Supervisory Board
- Miguel Maya Dias Pinheiro - Member of the Supervisory Board
- Lingjiang Xu - Member of the Supervisory Board

Members of the Bank's Supervisory Board met the requirements set out in Article 22aa of the Banking Law.

Olga Grygier – Siddons - Chairperson of the Supervisory Board (Independent member)

Ms Olga Grygier-Siddons graduated from the University of Manchester, Computer Science and Accounting. She is also Fellow Chartered Accountant, Institute of Chartered Accountants of England and Wales.

After having graduated in Great Britain, she pursued her professional career in the advisory sector. In 1991, she joined PwC in the Corporate Finance area. In 1998, she was promoted to the position of Partner and was responsible for the delivery of diverse projects for the public and private sectors around the world. In 2004, she decided to relocate to Poland and in 2014, she assumed the position of Managing Partner for Central and Eastern Europe at PwC. For 15 years she was responsible for business development and overseeing projects in 29 countries, in a company with 12,000 employees. She became the first female member of the PwC Strategy Council which comprises 20 top leaders of the PwC Network.

She retired from PwC in 2019 and currently serves as a strategic advisor and Mentor.

Moreover, until today she performs among other the following functions: Member of the Supervisory Board of Zabka Group founder and CEO of the Experiential Learning Hub - Villa Poranek.

Since 24 March 2021 Member of the Supervisory Board of Bank Millennium S.A. and since 27 March 2025 Chairperson of the Supervisory Board.

1. Nuno Manuel da Silva Amado – Deputy Chairman of the Supervisory Board

Mr Nuno Manuel da Silva Amado has a Business Degree from ISCTE (Instituto Superior de Ciencias do Trabalho e da Empresa) and attended the Advanced Management Programme at INSEAD (France).

From 1980 he worked in auditing (KPMG) and in international banks (Citibank, Deutsche Bank and Banco Santander) in Portugal. Between 2006 - 2012 he was Vice-Chairman of the Board of Directors and CEO of Banco Santander Totta (Portugal). From 2012 to 2018 he was Vice-Chairman of the Board of Directors and CEO of Banco Comercial Portugues (BCP), Portugal. Since July 2018 he has been Chairman of the Board of Directors of BCP.

Since 20 April 2012 Deputy Chairman of the Supervisory Board of Bank Millennium S.A.

2. Katarzyna Sułkowska - Secretary of the Supervisory Board (Independent member)

Ms Katarzyna Sułkowska graduated from the Cracow University of Economics, Faculty of Economics, Finance and Banking, specialisation in Banking with a master's degree, Pedagogical Studies at the Cracow University of Technology, and the Academy of Strategic Leadership at the ICAN Institute.

In the years 1997-1998 she worked at the Regional Chamber of Audit in Cracow in the Department of Information and Training. In 1998, she joined Citibank Poland in Warsaw where, until December 2001, she served as head of the Retail Debt Collection Department. In the years 2002-2007, she worked at BPH bank as the Managing Director of the Retail Debt Collection Department. From 2008, she worked as a Managing Director at Alior Bank, responsible for credit risk management. In 2012, she was appointed Member of the Management Board of Alior Bank S.A. responsible for risk, and in 2018 she was appointed Chairperson of the Management Board of Alior Bank S.A. She is the founder and CEO of Provenis, which she has been running since 2021, she also runs consulting activities.

Since 27 March 2025 Member of the Supervisory Board of Bank Millennium S.A.

3. Małgorzata Bonikowska - Member of the Supervisory Board (Independent member)

Ms Małgorzata Bonikowska - political scientist, expert in European Studies and international relations, member of Team Europe at the European Commission. Since 2013 she has been President of the Center for International Relations (www.csm.org.pl) – one of the oldest Polish think tanks specialising in foreign affairs. She is also co-founder (2009) and President of the THINKTANK centre for dialogue and innovations (www.think-tank.pl).

Dr Bonikowska is an assistant professor at the European Centre of the University of Warsaw, Head of the M. Yunus Chair at the Korczak University, as well as lecturer of international relations at the Vistula University. She studied in Poland and France (Sorbonne), graduated from two doctoral programmes (in Poland and abroad) and specialised studies at Columbia University in New York (political science, international and public affairs, Fulbright scholarship).

In the years 1995–1998, she worked for TVP as a journalist, specializing in domestic and international journalism. In 1998, she became the director of the European Information Centre of the Office of the Committee for European Integration, creating among others, a network of regional information centres (still in place as Regional Centres for International Debates under the Foreign Ministry of Poland) and the government Programme for Informing the Public about the EU.

In 2001-2007, dr Bonikowska was an expert and then head of the Information and Communication Programme of the European Commission – first in Poland and later in Bulgaria. In the years 2007-2016, she worked for the government Centre for Human Resources Development as an advisor to the Management Board on EU affairs.

She is the author of over 200 publications, conducts didactic and scientific activities. She comments regularly on European and international affairs in the Polish and foreign media.

Since 27 March 2025 Member of the Supervisory Board of Bank Millennium S.A.

4. Miguel de Campos Pereira de Bragança – Member of the Supervisory Board

Mr Miguel de Campos Pereira de Bragança has a Degree in Management and Administration from the Catholic University of Portugal and an MBA from INSEAD (France).

Started his career in 1989 in capital markets and investment banking, being since 1993 executive board member of Financial Institutions in Portugal, Brazil (Santander Brazil) and Great Britain (Abbey National). Between 2008-2012 he was Director, responsible for the Financial, Accounting and Management Control, Marketing and Products Areas, at Banco Santander Totta and Banco Santander de Negócios (Portugal). Since 2012 is Chief Financial Officer, board member and Vice-Chairman of the Executive Committee of Banco Comercial Português (BCP), Portugal.

Since 20 April 2012 he has been a Member of the Supervisory Board of Bank Millennium S.A. and since 2019 Vice-Chairman of the Board of Directors of Aktivobank.

Since 2018 Non-executive Director of SIBS, SGPS, SA and of SIBS Forward Payment Solutions, SA and Non-executive Director of the BofD of UNICRE- Instituição Financeira de Crédito, SA, as representative of Banco Comercial Português, SA.

5. Agnieszka Kłos - Siddiqui - Member of the Supervisory Board (Independent member)

Ms Agnieszka Kłos-Siddiqui graduated from the Faculty of Management at the AGH University of Science and Technology in Krakow. She is a certified auditor and a member of ACCA.

She has many years of managerial experience in the financial sector. In 2007 she started working at Provident Polska. During her carrier she managed the Business Development Office, as well as the

Finance Department. From 2016, she was a member of the management board at Provident Polska and managed the Sales and Customer Service division.

January 2018 she took up function of Chairperson of Management Board and performed it till August 2024. She took up that position as the first woman and the first Polish woman.

Before joining Provident Polska, she gained her professional experience at Ernst And Young Audit Sp. z o.o., with which she was associated for over 8 years, and at the English company Greig Middleton, which deals with brokerage consulting and services.

She values diversity and actively supports women. She was the chairwoman of the "Direction: Business Woman" platform, operating at the "Employers of Poland" organisation, as well as the plenipotentiary of the management board of that organization, for equal treatment of women and men. At Provident Polska, she was the leader of the "Providents Women's Power" project, which aims to strengthen women's involvement and help them develop their careers, as well as inspire them to be brave and "reach for more".

Since 27 March 2025 Member of the Supervisory Board of Bank Millennium S.A.

6. Anna Mankiewicz - Rębkowska - Member of the Supervisory Board (Independent member)

Ms Anna Mankiewicz-Rębkowska is an accomplished senior banking executive with over 15 years of experience in top-tier banks and in strategy consulting gained in Asia, Australia and Europe. She specialises in retail banking and wealth management, digitisation and innovation and large scale transformations.

She began her career in strategy consulting working for The Boston Consulting Group first out of the Amsterdam office from 2009 and later transferring to Sydney in 2012. At BCG, she specialized in corporate strategy for financial institutions, transformations, and technology.

Between 2013 and 2020, she held various leadership roles at the Commonwealth Bank of Australia where she gained valuable experience in retail banking, sales channels, digitisation and innovation.

More recently, she was a member of the leadership team for retail banking and wealth management for the 18 Asian, European and Middle Eastern markets reporting into the Citibank regional office in Singapore. This role allowed her to build a strong background in customer segmentation, acquisition and retention, loyalty and digital banking. She had P&L accountability for Citigold and Citigold Private Client segments.

She holds dual master's degrees obtained from the Warsaw School of Economics in 2007.

Since 27 March 2025 Member of the Supervisory Board of Bank Millennium S.A.

7. Alojzy Nowak – Member of the Supervisory Board (independent member)

Mr Alojzy Nowak in 1984 graduated from the Warsaw School of Economics; earned a Ph.D. in 1991 and Habilitation in 1995. Moreover in 1992 – as part of an annual scholarship from the A. Mellon Foundation - he studied economics at the University of Illinois at Urbana-Champaign, USA; in 1993, as a scholarship holder of the United Kingdom Government under the Know-How Fund, he studied banking, finance and capital markets at the University of Exeter; in 1996, as part of a semester scholarship from the German Government, he studied economics at Freie Universität in Berlin, and in 1997 as part of a semester scholarship of the Belgian Government, he studied international economics at the RUCA University in Antwerp.

In 2002 he became Professor of Economics.

He has won a number of prestigious awards, including the Rector's Award for Scientific Achievements (annually since 1997), Award of the Minister of Education for the book "Integracja europejska. Szansa

dla Polski?” and the book „Banki a gospodarstwa domowe - dynamika rozwoju”. Member of many scientific organizations and professional editorial boards of periodicals, among others “Foundations of Management” (member of the editorial board), “Journal of Interdisciplinary Economics” (editor-in-chief), “Yearbook on Polish European Studies”, “Mazovia Regional Studies”, “Gazeta Bankowa” and a reviewer in PWE SA Warszawa publishing company. For many years committee member of “Teraz Polska” Award and scientific council member of “Studia Europejskie”. Author of over 300 publications in Poland and abroad.

He gained his professional experience working among others as Head of the International Business Relations Section at the Management Faculty, University of Warsaw, Head of National Economy Chair at the Management Faculty UW, Director of European Center at the University of Warsaw, Deputy Dean in charge of foreign cooperation at the Management Faculty, University of Warsaw, next as Dean at the Management Faculty, University of Warsaw and Vice-Rector for Research and Liaison, University of Warsaw. Since September June 2020 he has become the Rector of the University of Warsaw. He is a lecturer at the University of Warsaw, and also in France, UK, USA, Russia, China and Korea.

Further, he worked and still works as: advisor to the Prime Minister, to the Minister of Agriculture, CEO of the University Sports Association in Poland and at the University of Warsaw, member of the NewConnect advisory committee at the Management Board of the Warsaw Stock Exchange, member of the Foundation Council of the National Bank of Poland, chairman of the Council of the Scientific of the National Bank of Poland. Over the years he sat on supervisory boards of various institutions, including among others: PZU S.A., PTE WARTA S.A., PKO BP S.A., Cyfrowy Polsat S.A., ZE PAK S.A., JSW S.A., Chairman and Deputy Chairman of the Supervisory Board in EUROLOT S.A.

He was a member of the National Development Council appointed by President Andrzej Duda. Currently in the Council for Higher Education, Science and Innovation within the NRR. Since December 2018 he has been a member of the Scientific Council of the Institute of New Structural Economics at the University of Beijing, where he is among 22 outstanding scientists from around the world, including 4 Nobel laureates in the field of economic sciences.

Since 26 March 2018 Member of the Supervisory Board of Bank Millennium S.A.

8. Izabela Olszewska - Member of the Supervisory Board (Independent member)

Ms Izabela Olszewska is a graduate of the Faculty of Finance and Statistics at the Warsaw School of Economics. She completed doctoral studies at the Faculty of Economic Sciences of the University of Warsaw, and obtained an MBA degree at the University of Economics and Humanities in Warsaw. She also completed the High-Performance Board Member programme, organised by renowned business schools – IESE Business School, University of Navarra and WHU Otto Beisheim School of Management.

She has been associated with the financial market, in particular the capital market, for over thirty years, initially as a financial analyst at the Capital Operations Centre of Bank Handlowy w Warszawie S.A., and since 1999 as an employee of Giełda Papierów Wartościowych S.A. (GPW), where she has held various managerial positions in the area of strategy and business development. She cooperated with the banking sector, funds, brokerage houses, investors and entrepreneurs from various sectors of the economy. She was responsible for expanding the offer of financial instruments. From 2018 to 2024, she was a Member of the GPW Management Board, supervising the strategic and business area, ESG, investor relations, and corporate relations within the capital group.

She has extensive experience serving on supervisory boards. In particular, she chaired the Supervisory Board of Towarowa Giełda Energii S.A. and GPW Benchmark S.A., and served as a Chairwoman of the Audit Committee of BondSpot S.A.. She also served as a Non-Executive Director on the Board of Directors of Aquis Exchange Ltd., headquartered in London. In 2021-2024, she was a member of the University Board of the Warsaw School of Economics. Since July 2025, she has been a member of the

Supervisory Board of Develia S.A. She is affiliated with the Association of Independent Non-Executive Directors.

Recognised by the World Federation of Exchanges (WFE) in the Women Leaders 2023 ranking, and also awarded by Forbes in the prestigious "Responsible Leadership" category.

Since 27 March 2025 Member of the Supervisory Board of Bank Millennium S.A.

9. José Miguel Bensliman Schorcht da Silva Pessanha – Member of the Supervisory Board

Mr José Miguel Bensliman Schorcht da Silva Pessanha has a Master's Degree in Economics from Université Catholique de Louvain and a Master's Degree in Operational Research (academic portion) from Instituto Superior Técnico and also has a Licentiate Degree in Economics, Universidade Católica Portuguesa. He attended the PADE (Corporate Senior Management Programme) at Associação de Estudos Superiores de Empresa (AESE), the Eureho Program in INSEAD, he had a Scholarship from Invotan (NATO) and received a scholarship linked to the Award Joseph Bech, granted by the Government of Luxembourg for commitment to the European Union.

From 1982 to 1989 he worked as a financial services advisor - Banco Português do Atlântico, Banco Nacional Ultramarino, Banco Espírito Santo, Manufacturers Hannover Trust, between 1982 – 1995 he was Professor in charge of the courses of Statistics I and II and Econometrics - Universidade Católica Portuguesa. He was responsible for risk control, ALM, financial markets research and capital markets areas in the Financial Division – Banco Português do Atlântico, S.A. from 1989 to 1995 and Advisor to the Chairman of the Plan National Council from 1990 to 1993. Between 1993 and 2002 he was a Member of the Board of Directors of Corretora Atlântico - Soc. Financeira de Corretagem S.A. and of Servimédia – Sociedade Mediadora de Capitais, S.A. and Chairman of the Board of Directors of Servimédia - Sociedade Corretora S.A. and Head of the Assets and Liabilities Management Division of BPA (1995 – 1998), and of BCP (1998 – 2000). At Banco Comercial Português, S.A. he was Head for the "Year 2000" Project of Group BCP (1999 – 2000) and was responsible for the design, development and launching of the "cidadebcp" bank website (2000 – 2002). From 1998 to 2003 he coordinated the Investment Products Unit of Banco Comercial Português, S.A. From 2003 to 2015 he was the Group Risk Officer of Banco Comercial Português, S.A. In 2014 he was a lecturer responsible for the banking in a global context course at Universidade Católica Portuguesa.

Currently he is a Member of the Board of Directors and of the Executive Committee of Banco Comercial Português, S.A., Member of the Board of Directors of ActivoBank, Vice-Chairman of the Board of Directors and Chairman of the Audit Board of Millennium bcp Ageas Grupo Segurador, SGPS, S.A., Vice-Chairman of the Board of Directors and Chairman of the Audit Board of Ocidental - Companhia Portuguesa de Seguros de Vida, S.A. and Vice-Chairman of the Board of Directors and Chairman of the Audit Committee of Ageas – Sociedade Gestora de Fundos de Pensões, S.A. (formerly Ocidental – Sociedade Gestora de Fundos de Pensões, S.A.).

He is also Member of the Board of Directors and Chairman of the Audit Committee of BIM – Banco Internacional de Moçambique, S.A.(Mozambique) and Vice-Chairman of the Board of Directors and Chairman of the Audit Committee of Banco Millennium Atlântico, S.A.(Angola). Since 26 March 2018 Member of the Supervisory Board of Bank Millennium S.A.

10. Miguel Maya Dias Pinheiro – Member of the Supervisory Board

Mr Miguel Maya Dias Pinheiro graduated from Instituto Superior das Ciências do Trabalho e da Empresa (ISCTE) with a bachelor's degree in Business Organization and Management, having also completed a Senior Management Programme (PADE) at AESE, an Advanced Management Programme at INSEAD and a Corporate Governance Programme also at AESE.

From 1987 to 1990 he held commercial and financial functions in an SME company. Joined Banco Português do Atlântico in 1990, institution where he assumed functions in the corporate banking area and led the coordination of the Economic and Financial Research.

Between 1996 and 2007 he assumed several senior management positions within Banco Comercial Português (BCP) Group both in Portugal and Spain, namely head of the Corporate Banking Marketing Division of BCP, Coordinator of the Retail Banking network of NovaRede, CEO of Manager Land in Barcelona, head of Innovation and Commercial Division of BCP. From 2007 to 2009 he was Chief of Staff of the Chairman of the Executive Board of Directors of BCP.

In 2009 Mr Miguel Maya was appointed Member of the Executive Board of Directors of BCP, Member of the Board of Directors of Fundação Millennium BCP and Chairman of the Board of Directors of Banco ActivoBank, S.A.

Between 2012 and 2016 he was Chairman of the Board of Directors of Banco Millennium Angola, S.A. and in 2016, following the merger of this institution with Banco Privado Atlântico, S.A. which resulted in the creation of Banco Millennium Atlântico, S.A., Mr Miguel Maya was appointed Vice-Chairman and Member of the Board of Directors of the new entity – position that he held until 2022.

From 2012 to 2019 Mr Miguel Maya was Chairman of the Board of Directors of Interfundos - Gestão de Fundos de Investimento Imobiliário, S.A.

Currently Mr Miguel Maya holds the following positions in BCP's Group governing bodies: Chief Executive Officer (CEO) and Vice-Chairman of the Board of Directors of BCP, Chairman of the Board of Directors of ActivoBank, S.A., Manager of BCP Africa, SGPS, Lda. and Member of the Board of Directors of Banco Internacional de Moçambique, S.A.

Since 21 May 2015 he has been a Member of the Supervisory Board of Bank Millennium S.A.

11. Lingjiang Xu – Member of the Supervisory Board

Mr Lingjiang Xu has a Bachelor's Degree in German from the Foreign Studies University of Beijing, a Master's Degree in World Economics from the Nan Kai University, Tianjin and a Master's Degree in Finance from the London Business School.

From July 1993 to February 1995 he worked as Desk Officer at the European Affairs Department of the Chinese Ministry of Foreign Trade and Economic Cooperation in Beijing. He was Third Secretary of the Commercial Office of the Chinese Consulate General in Hamburg from February 1995 to October 1998. Between October 1998 and February 2006 he was the Division Director of the European Affairs Department of Chinese Ministry of Commerce in Beijing. From February 2006 to January 2010 he was the First Secretary of the Commercial Office of the Chinese Embassy in London. In September 2011 he was elected Associate Director of Vermilion Partner LLP (London) (to March 2012). From March 2012 to December 2013 was Partner to RH Regent Investment Management Co Ltd (Shanghai). During the years of 2015 to 2017, he was Non-Executive Director of Luz Saúde, S.A. and Non-executive Director of Multicare – Seguros de Saúde, S.A., as well as Non-executive Director of the Board of Directors of Fidelidade Assistência – Companhia de Seguros S.A. From 18 October 2016 to 31 March 2017 he held the position of Non-executive Member of the Board of Directors of Chiado (Luxembourg) S.à.r.l. From November 2019 to December 2023, he held position as Non-executive Member of the Board of Directors of Luz Saude, S.A. Currently he is Non-executive Member of the Board of Directors, Member of the Committee for Nominations and Remunerations and Member of the Committee for Corporate Governance, Ethics and Professional Conduct of Banco Comercial Português, S.A. He is also Non-executive Member of the Board of Directors of Fidelidade - Companhia de Seguros, S.A., Chairman of the Board of Directors of Longrun Portugal, SGPA, S.A. Mr Lingjiang works as non-executive chairman of the board of the directors at Longrun Portugal SGPA, S. A. from 23 November 2020 to 26 September 2024.

Since 26 March 2018 Member of the Supervisory Board of Bank Millennium S.A.

Standing Committees of the Supervisory Board

The Supervisory Board may establish standing or ad hoc committees, composed of members of the Supervisory Board, to carry out specific supervisory tasks. The Standing Committees of the Supervisory Board are: the Audit Committee, Personnel Committee and Committee for Risk Matters.

Detailed information regarding the composition of the committees and the issues raised during the meetings of the Committees in 2025 is to be found in the “Annual Report of the Supervisory Board for the financial year 2025”, published on Bank Millennium’s website.

Audit Committee

The Audit Committee is a standing committee of the Supervisory Board, established in 2000 and supporting the Supervisory Board in supervision over the execution of the internal audit function in the Bank. Furthermore, the Audit Committee focuses on financial reporting, internal control and risk management at the Bank.

Pursuant to the Act of 11 May 2017 on statutory auditors, audit firms and public oversight the Audit Committee consists of at least three Members. The Members of the Audit Committee have knowledge and skills in accounting or auditing of financial statements, as well as in the banking sector, which is confirmed by the history of their professional career and the duties hitherto performed by them. The majority of the Members of the Audit Committee, including its Chairman, are independent of the Bank. The Audit Committee meets on a regular basis (once every quarter) upon the initiative of the Chairman of the Committee and in the extraordinary mode it is convened by the Chairman of the Supervisory Board on his own initiative or at the request of a Member of the Supervisory Board or a Member of the Management Board.

The main responsibilities of the Audit Committee include specifically:

- (I) monitoring the processes of financial reporting and sustainability reporting,
- (II) monitoring the effectiveness of the internal control systems and risk management systems, and internal audit, including in the area of financial reporting and sustainability reporting,
- (III) submission of recommendations to the Supervisory Board regarding selection of auditing firm to perform audit of financial statements and to perform attestation of sustainability reporting,
- (IV) preparing for the Supervisory Board opinions providing the basis of performing by the Supervisory Board assessments of the adequacy and effectiveness of the internal control system, including the annual review of the adequacy and effectiveness of the control function, Compliance Department and Internal Audit Department, and
- (V) controlling and monitoring the independence of a statutory auditor and audit firm, particularly in the case when other services than audit of financial statements and attestation of sustainability reporting are provided for the Bank by an audit firm.

In 2025 eight meetings of the Audit Committee of the Supervisory Board took place, at the following dates:

1Q2025:	29.01.2025, 24.02.2025, 24.03.2025 (by circulation)
2Q2025:	08.05.2025,
3Q2025:	24.07.2025,
4Q2025:	22.10.2025, 05.11.2025, 12.12.2025 (by circulation)

At three meetings of the Committee, issues related to sustainability reporting or its attestation were discussed.

Detailed information regarding the issues raised during the meetings of the Committee in 2025 is to be found in the „Report on activities of the Supervisory Board of Bank Millennium S.A. in 2025” in the chapter „Activities of the Audit Committee in the reporting period”.

In the period from 01.01.2025 to 26.03.2025 the Audit Committee of the Supervisory Board of Bank Millennium S.A. functioned in the following composition:

1. Chairman of Committee: Mr. Grzegorz Jędrys independent member
2. Member of Committee: Mr. Miguel de Campos Pereira de Bragança
3. Member of Committee: Ms. Olga Grygier-Siddons independent member
4. Member of Committee: Ms. Anna Jakubowski independent member
5. Member of Committee: Mr. Alojzy Nowak independent member
6. Member of Committee: Mr. José Miguel Bensliman Schorcht da Silva Pessanha

On 27 March 2025, the Supervisory Board of Bank Millennium S.A. re-elected the members of the Audit Committee of the Supervisory Board for a new term of office. Therefore, in the period from 27.03.2025 to 31.12.2025, the Audit Committee of the Supervisory Board of Bank Millennium S.A. functioned in the following composition:

1. Chairwoman of Committee: Ms. Agnieszka Kłos-Siddiqui independent member
2. Member of Committee: Ms. Olga Grygier-Siddons independent member
3. Member of Committee: Ms. Izabela Olszewska independent member
4. Member of Committee: Mr. Miguel de Campos Pereira de Bragança
5. Member of Committee: Mr. José Miguel Bensliman Schorcht da Silva Pessanha

The composition of the Audit Committee satisfied the criteria stipulated in Art. 129 section 1 and 3 of the Act of 11 May 2017 on Statutory Auditors, Audit Firms and Public Oversight.

Personnel Committee

The Personnel Committee has existed at the Bank since 2000. Its responsibilities include in particular:

- (I) evaluating candidates for Members of the Bank's Management Board,
- (II) defining and conditions of employment of newly appointed Members of the Bank's Management Board,
- (III) negotiating change of terms and conditions of employment of Members of the Bank's Management Board,
- (IV) with respect to Members of the Management Board defining evaluation criteria, evaluating work as well as deciding on annual bonuses,
- (V) determining terms and conditions of termination of employment of Members of the Bank's Management Board,
- (VI) evaluating policy on variable components of remuneration, and issuing recommendations regarding:
 - a) remuneration amount and components, guided by prudential and stable risk, capital and liquidity management as well as long-term benefit of the Bank,
 - b) variable remuneration of persons occupying management positions in the Bank involved with risk management and with compliance of the Bank's activity with legal and internal regulations.

During the period from 1 January 2025 to 27 March 2025 the composition of the Committee was as follows:

1. Alojzy Nowak – Chairman
2. Miguel de Campos Pereira de Bragança
3. Bogusław Kott
4. Olga Grygier-Siddons
5. Anna Jakubowski

In the period from 27 March 2025 to 31 December 2025, in accordance with the appointment of the Supervisory Board for a new term of office, the Committee operated with the following composition:

1. Alojzy Nowak – Chairman
2. Małgorzata Bonikowska
3. Miguel de Campos Pereira de Bragança
4. Olga Grygier-Siddons
5. Miguel Maya

Committee for the Risk Matters

The Committee for the Risk Matters was set up on 4 December 2015. Its competences include the tasks stipulated for such committee in the Banking Law and allocated to it in other regulations applicable to banks as well as supervisory recommendations implemented by the Bank, in particular:

- (I) provision of opinions on overall, current and future readiness of the Bank to undertake risk,
- (II) provision of opinions on the strategy of management of risk inherent in the Bank operations, as developed by the Bank Management Board and on information regarding implementation of the said strategy, as submitted by the Bank Management Board,
- (III) provision of support to the Bank Supervisory Board in supervision of implementation of the risk management strategy relative to the Bank operations by the Bank's senior management staff,
- (IV) provision of opinions on the assessment Risk Management Function and Validation Function as well as on exceptional transactions that may impact the Bank risk profile;
- (V) provision of opinion on whether incentives provided by the remuneration policies and practices take into consideration the institution's risk, capital and liquidity and the likelihood and timing of earnings.
- (VI) verification whether prices of assets and liabilities offered to clients fully take into account the Bank's business model, its risk strategy and in case the prices fail to reflect types of risk appropriately and in keeping with the said model and strategy, submission of proposals to the Bank Management Board to ensure adequacy of prices of assets and liabilities relative to relevant types of risk.

Till 27th March 2025, the composition of the Committee was as follows:

1. Mr. Dariusz Rosati – Chairman,
2. Mrs. Beata Stelmach,
3. Mr. Miguel de Campos Pereira de Bragança,
4. Mr. Grzegorz Jędryś,
5. Mr. José Miguel Bensliman Schorcht da Silva Pessanha.

On 27 March 2025, the Ordinary General Meeting of the Bank elected the Bank's Supervisory Board for a new three-year term. The Supervisory Board appointed the Committee in the following composition:

1. José Miguel Bensliman Schorcht da Silva Pessanha - President
2. Olga Grygier-Siddons
3. Miguel de Campos Pereira de Bragança
4. Anna Mankiewicz-Rębkowska
5. Katarzyna Sułkowska

According to the „*Policy of Remuneration of Members of the Supervisory Board of Bank Millennium S.A.*”, adopted by the General Meeting, members of the Supervisory Board of the Bank are entitled to monthly remuneration for sitting on the Supervisory Board. The amount of the remuneration is defined by a resolution adopted by the General Meeting with the consideration of the principles stipulated in *the policy*, including the principle of its adequacy to the scale of the Bank's operation. The remuneration may be diversified in view of the function performed in the Supervisory Board and should be correlated with the involvement in the work of the Supervisory Board and the level of remuneration received by members of supervisory bodies of institutions with a similar scope and scale of operation. Irrespective of the remuneration for sitting on the Supervisory Board, members of standing committees of the Supervisory Board are entitled to separate remuneration in connection with the tasks performed by them as part of these committees. If the Supervisory Board delegates its member to individually exercise supervision on a permanent basis, the Supervisory Board may assign to such Supervisory Board member additional remuneration for the duration of the delegation, however its monthly amount cannot exceed 100% of the base remuneration for sitting on the Supervisory Board. In case of standing committees of the Supervisory Board the remuneration is payable for participation in their meetings. The total remuneration due to a Supervisory Board member for participation in meetings of committees of the Supervisory Board in a given accounting year cannot exceed 100% of his base remuneration for sitting on the Supervisory Board of the Bank. In connection with remuneration paid, the Bank shall make appropriate deductions under relevant legal regulations. Each of the Supervisory Board members may make a declaration to refrain from collection of all or part of the remuneration. Declarations to such effect shall be submitted to the Chairman of the Supervisory Board.

Remuneration paid to members of the Supervisory Board in 2025 (in PLN thousand):

Supervisory Board members serving at the end of 2025

Name and surname	Remuneration for serving on the Supervisory Board	Remuneration for participation in Committee	Other benefits	Total
Olga Grygier-Siddons	256.94	116.00		372.94
Nuno Manuel Da Silva Amado	165.65	0.00		165.65
Katarzyna Sułkowska	137.42	28.00		165.42
Małgorzata Bonikowska	137.42	21.00		158.42
Miguel De Campos Pereira De Bragança	165.65	121.00		286.65
Agnieszka Kłos-Siddiqui	137.42	60.00		197.42
Anna Mankiewicz-Rębkowska	137.42	21.00		158.42
Alojzy Nowak	165.65	88.00		253.65
Izabela Olszewska	137.42	35.00		172.42
José Miguel Bensliman Schorcht da Silva Pessanha	165.65	98.00		263.65
Miguel Maya Dias Pinheiro	165.65	28.00		193.65
Lingjiang Xu	165.65	0.00		165.65
Total:	1 937.94	616.00		2 553.94

Former Members of the Supervisory Board serving until March 27, 2025

Name and surname	Remuneration for serving on the Supervisory Board	Remuneration for participation in Committee	Other benefits	Total
Bogusław Kott	57.42	15.00	71.81	144.23
Dariusz Rosati	28.71	10.00	-	38.71
Anna Jakubowski	28.71	25.00	-	53.71
Grzegorz Jędryś	28.71	25.00	-	53.71
Beata Stelmach	10.00	5.00	-	15.00

Remuneration from other entities of the Bank Millennium SA Group (in PLN thousand)

Name and surname	Remuneration for serving on the Supervisory Board	Remuneration for participation in Committee	Other benefits	Total
Grzegorz Jędryś	120	31	-	151

In 2025, Grzegorz Jędryś received remuneration for his membership in the Supervisory Board of Millennium Bank Hipoteczny.

The Bank's shares held by Supervisory Board Members (performing their functions on 31 December 2025):

Name and surname	Function	Number of shares 31.12.2025	Number of shares 31.12.2024
Olga Grygier-Siddon	Chairman of the Supervisory Board	0	0
Nuno Manuel da Silva Amado	Deputy Chairman of the Supervisory Board	0	0
Katarzyna Sułkowska	Secretary of the Supervisory Board	0	n/a
Małgorzata Bonikowska	Member of the Supervisory Board	0	0
Miguel de Campos Pereira de Bragança	Member of the Supervisory Board	0	0
Agnieszka Kłos-Siddiqui	Member of the Supervisory Board	0	n/a
Anna Mankiewicz-Rębkowska	Member of the Supervisory Board	0	n/a
Alojzy Nowak	Member of the Supervisory Board	0	0
Izabela Olszewska	Member of the Supervisory Board	0	n/a
José Miguel Bensliman Schorcht da Silva Pessanha	Member of the Supervisory Board	0	0
Miguel Maya Dias Pinheiro	Member of the Supervisory Board	0	0
Lingjiang Xu	Chairman of the Supervisory Board	0	0

13.4 Management Board

The Management Board is the management body of the Bank and manages the entirety of the Bank's operations. In legal terms, the Management Board operates pursuant to the Code of Commercial Companies and other regulations, the Bank's Articles of Association, resolutions of the General Meeting of Shareholders and the Supervisory Board, as well as provisions of the "*Bank Millennium S.A. Management Board's Operations bylaws*" adopted by the Supervisory Board, which is available from the Bank's website on the "*About the Bank > Corporate Bodies and Governance*" tab, link to website www.bankmillennium.pl/about-the-bank/corporate-bodies-and-governance.

The competences of the Management Board include all matters that are not reserved for other bodies of the Bank.

The Management Board makes decisions collectively. Resolutions of the Management Board are adopted by ordinary majority of votes of the Management Board Members participating in the voting. In the case of equal votes the Chairman of the Management Board has a decisive vote. Resolutions of the Management Board may be adopted, if at least half of the Management Board Members participate in the voting.

The following persons are authorized to make declarations of will regarding the Bank's property rights and obligations and to sign documents on behalf of the Bank:

- (I) the Chairman of the Management Board individually,

- (II) two other Members of the Management Board acting jointly or one Member of the Management Board acting jointly with a registered proxy or two registered proxies.

Attorneys-in-fact may be appointed to perform specified activities, and shall act individually within the scope of their authorization.

The Management Board of the Bank is composed of at least three persons, including the Chairman of the Management Board. At least half of the Members of the Management Board should be Polish nationals. The Management Board is appointed by the Supervisory Board. The term of office of a Management Board is 3 years. A Member of the Management Board may be recalled by the Supervisory Board at any time.

The Bank's Management Board during the period from 1 January 2025 to 27 March 2025 consisted of the following persons:

- 1) Joao Nuno Lima Bras Jorge – Chairman of the Management Board
- 2) Fernando Maria Cardoso Rodrigues Bicho – Deputy Chairman of the Management Board
- 3) Wojciech Haase – Member of the Management Board
- 4) Andrzej Gliński – Member of the Management Board
- 5) Wojciech Rybak – Member of the Management Board
- 6) António Pinto Júnior – Member of the Management Board
- 7) Jarosław Hermann – Member of the Management Board

On 27 March 2025, the Supervisory Board appointed the Management Board for a new term of office in the following composition:

- 1) Joao Nuno Lima Bras Jorge – Chairman of the Management Board
- 2) Fernando Maria Cardoso Rodrigues Bicho – Deputy Chairman of the Management Board
- 3) Wojciech Haase – Member of the Management Board
- 4) Jarosław Hermann – Member of the Management Board
- 5) Halina Karpińska – Member of the Management Board
- 6) António Pinto Júnior – Member of the Management Board
- 7) Magdalena Zmitrowicz – Member of the Management Board

Members of the Bank's Management Board met the requirements set out in Article 22aa of the Banking Law.

Joao Bras Jorge – Chairman of the Management Board



Mr Joao Nuno Lima Bras Jorge, graduate of the Management Studies at Universidade Catolica Portuguesa, PADE Advance Management Programme under AESE and International Director Programme IDP-C from INSEAD.

He started his professional career as a stockbroker in 1990. In the ensuing 10 years he worked in investment banking, inter alia, as Member of the Management Board at an investment bank. He also sat on the Board of the Lisbon Stock Exchange.

During the 5 years prior to his move to Poland he held the position of Head of the Retail Banking Customer Division and Coordinator of the Retail Network at Millennium bcp. Since 19 July 2006 - Member of the Management Board of Bank Millennium S.A., in the years 2006-2008 Head of the Retail Banking Division and from 2009 – Head of the Corporate Banking Area. From 22 April 2010 – Deputy Chairman of the Management Board and since 24 October 2013 – Chairman of the Management Board of Bank Millennium S.A.

Fernando Bicho – Deputy Chairman of the Management Board

Mr Fernando Maria Cardoso Rodrigues Bicho graduated from the Economic Department at Universidade Catolica Portuguesa in 1984. In 1993 he obtained an MBA from Universidade Catolica Portuguesa.

He gained his professional experience inter alia in the Portuguese Foreign Investment Institute, Lloyds Bank Plc in Lisbon and Uniao de Banco Portugueses (UBP), later renamed to Banco Mello. He performed duties as fund manager and later in the bank, as Head of the Financial Division, he was in charge of inter alia the treasury and capital markets, securities operations, asset and liabilities management, issues on international capital markets, capital management and investor relations. After the purchase of Banco Mello by Banco Comercial Portugues (BCP) in 2000, Mr Fernando Bicho worked in the BCP Corporate Centre and from June 2001 he was Head of the Asset and Liabilities Management Department of the BCP Group.

Since 1 August 2002 Member of the Management Board of Bank Millennium S.A. (CFO – Chief Financial Officer) and since 20 April 2012 Deputy Chairman of the Management Board. From 3 June 2019 until the day of merger with Bank Millennium S.A., i.e. 1 October 2019, also Deputy Chairman of the Management Board of Euro Bank S.A.

Since 17 September 2020, Chairman of the Supervisory Board of Millennium Bank Hipoteczny S.A.

He supervises treasury, accounting, financial reporting and control, taxes, capital investments, relations with investors and financial institutions, management information and central acquisition, as well as coordination of Group entities (other than leasing, brokerage, related to investment funds and startups).

Wojciech Haase - Member of the Management Board

Mr Wojciech Haase graduated from the Faculty of Production Economics at Gdańsk University.

He worked at the National Bank of Poland in Gdańsk to be then transferred to the group organising Bank Gdański S.A. In 1989-1997 he worked at Bank Gdański S.A. - first in the Credit Department and then in the Treasury Department. From 1993 he was Deputy Chairman of the Management Board of Bank Gdański S.A. and, next, acting Chairman of the Management Board of that Bank.

Since 27 June 1997 Member of the Management Board of Bank Millennium S.A. Since 4 December 2015 the Bank's material risk management supervisor. Moreover, he supervises risk management, risk models, credit and ratings processes, liabilities collection and treasury control.

Jarosław Hermann - Member of the Management Board

Mr Jarosław Hermann graduated from the Applied Mathematics and Physics Faculty at the Warsaw University of Technology in 1994 and Carlson School of Management MBA program in 2002. He gained broad IT & Operations practice working on managerial positions in PepsiCo, Pioneer Financial Services and Accenture, where he conducted mid / large scale projects in the banking sector in Poland and CEE countries. Between 2005-2010 he was Board Member of First Data Poland responsible for providing IT and operational services for card acquiring and financial solutions business lines. Between 2010-2016 he was Board

Member of AXA companies in Poland responsible for IT & Operations. From 2016 to 2018 he was Vice President of Polskie ePłatności, emerging card acquirer. Since 1 August 2018 Member of the Management Board of Bank Millennium S.A. He supervises IT, operations in the product's area, settlements and cash management, records, control and settlement of treasury transactions, as well as security and business continuity.

Halina Karpińska – Member of the Management Board



She is a graduate of the University of Warsaw, Faculty of Iberian Studies (1999). In the years 1996- 1999, she studied management and marketing at the Kozminski University of Entrepreneurship and Management.

She has been associated with Bank Millennium since 2002. Since 2003, she has been responsible for the development of digital channels in the Internet Banking Department. Since 2010, she has also been responsible for the creation and development of standards in the area of UX and UI – she initiated the creation of the first internal laboratory among Polish banks "User-Experience Lab". Since 2015, she has been managing sales area, the UX and UI in the electronic channels. In May 2018, she took the position of Director of the Electronic Banking Department. She co-created many innovative digital solutions (deposit auctions, happy hours, motor vehicle and travel insurance, savings plan, Personal Finance Management).

From 2000 to 2002, she worked for Jeronimo Martins as a district coordinator.

She was a Member of the Supervisory Board of Polish Standard Payment Sp. z o.o. (Blik) in 2018- 2024.

In 2019, 2021, 2023, 2024, she was included in the list of the most influential women in the Polish payment industry in the ranking prepared by the cashless.pl portal.

She also received the title of Personality of the Year in the Institution of the Year 2020 ranking.

António Pinto Júnior - Member of the Management Board



Mr António Pinto Júnior graduated in Economics (1985-1990) from Oporto University and Corporate Finance from Minho University (1993-1994).

He started his professional career in Banco Português do Atlântico (1990), since 1994 part of Millenniumbcp Group, gaining experience in Retail and Corporate Banking by holding managerial positions in the marketing and sales support areas.

Between 2001 and 2011 he worked in Bank Millennium, S.A., as Head of Departments in charge of Marketing, Quality, Processes and Operations, and, from April 2010, as a Member of the Management Board. In the following 7 years he held the position of Head of Retail

Banking Marketing Department in Millenniumbcp in Portugal, and between July 2016 and May 2018 was also a non-executive Member of the Management Board of ActivoBank.

Since 20 April 2018 Member of the Management Board of Bank Millennium S.A. From 3 June 2019 until the day of merger with Bank Millennium S.A., i.e. 1 October 2019, also Deputy Chairman of the Management Board of Euro Bank S.A.

He supervises electronic banking, sales campaigns, retail and corporate banking marketing, processes support management, administration and infrastructure, complaints and quality of services, coordination of Group entities from the area of investment funds and startups

Magdalena Zmitrowicz - Member of the Management Board

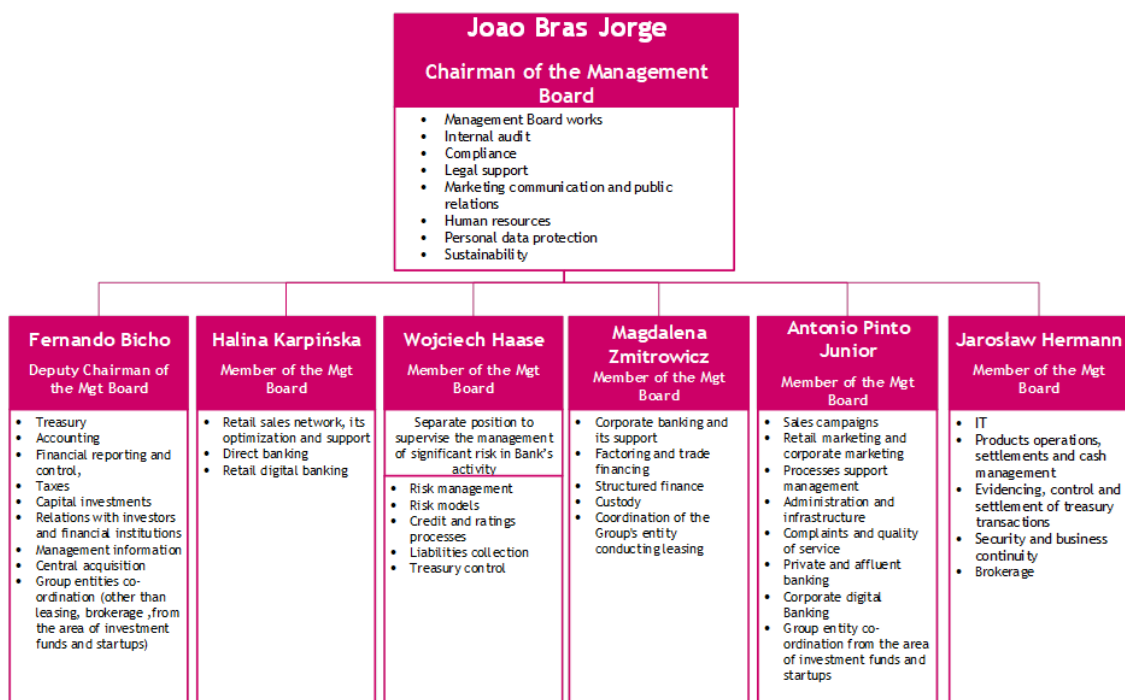


She is a graduate of the Faculty of Social Sciences and postgraduate studies at the Faculty of Management at the University of Gdańsk. In 2020, she completed the Executive MBA at the University of Warsaw and in 2022 the Global CEO Program at the Wharton School, University of Pennsylvania US. She has over 20 years of experience in banking, covering various levels of management and areas of banking activity, including in particular sales, risk and product management. During her 18 years of work at Bank Handlowy in Warsaw S.A., initially in the retail banking sector, and then in the corporate banking division, she held a several of managerial positions in the Bank's branch and regional structures. From 2016 to 2017, she managed the Corporate Banking Department at CEEMEA Commercial Banking Group

Citigroup. In 2018, she joined to the Bank Pekao S.A. as a Managing Director in the Corporate Banking Department, and then from December 2018 to September 2024 she held the position of the Vice President of the Management Board responsible for the Corporate Division. During this period, she held, among others, the position of Member of the Supervisory Board of Pekao Leasing and Pekao Faktoring as the Chairwomen of the Supervisory Board. She also held the position of the Chairwomen of the Council of the Polish Bank Association for Micro, Small and Medium-sized Corporates.

She is a member of the Executive MBA Education team within the Business Council of the Faculty of Management at the University of Warsaw. In 2023, she became an ambassador for the EU's Women in Finance program, run by Bloomberg. In 2024, she was awarded the title of SME Banker of the Year 2024, granted by the international organization QORUS for her exceptional contribution to the development of SME banking, long-term support for companies and above-average results compared to the sector. She was awarded the Nicolaus Copernicus Medal from the Polish Bank Association for her merits in financing of the SME sector.

The organisational structure of the Bank is consistent with the strategy, modern approach to business and complies with the principles of corporate governance for financial institutions. The division of the tasks between the members of Management Board of the Bank is presented on the following diagram:



The principles of remuneration of the Management Board Members with the amount of salaries, bonuses and other benefits received in 2025 can be found in chapter 12 of this report, part 12.3 entitled "*Remuneration policy*".

In accordance with the above-mentioned principles of remuneration, in 2025 Members of the Bank's Management Board were not granted Bank's shares as part of the implementation of the incentive program. Therefore, the status of shares owned by the Management Board Members who performed their functions on 31 December 2025 was as follows:

Name and surname	Function	Number of shares		Number of shares	
		as of 31 December 2025		As of 31 December 2024	
		Total	Including those received as a part of the incentive scheme blocked on investment accounts until:		
			05.05.2026.	05.06.2026	
Joao Nuno Lima Bras Jorge	Chairman of the Management Board	464 619	41 459	42 901	380 259
Fernando Maria Cardoso Rodrigues Bicho	Deputy Chairman of the Management Board	234 289	27 555	30 482	176 252
Wojciech Haase	Management Board Member	198 469	22 525	24 837	151 107
Jarosław Hermann	Management Board Member	47 362	22 525	24 837	0
Halina Karpińska	Management Board Member	11 995	/-/	/-/	/-/
Antonio Ferreira Pinto Junior	Management Board Member	60 975	22 525	24 837	13 613
Magdalena Zmitrowicz	Management Board Member	0	/-/	/-/	/-/

13.5 Internal control system and external auditor

Internal Control System

The Bank's internal control system is organised in the framework of the so-called three independent lines of defence, which comprise:

- 1st line – the Bank's operating units not belonging to the 2nd and 3rd line of defence,
- 2nd line – Compliance Department and units designated by the Management Board (mainly units managing risk),
- 3rd line – Internal Audit Department.

The internal control system covers all organisational units of the Bank and subsidiaries belonging to the capital group.

The main objectives of the internal control system are to ensure:

- effectiveness and efficiency of the Bank's operations,
- credibility of financial information (including completeness, correctness and comprehensiveness of administrative and accounting procedures and fair and true internal and external reporting),
- observance of risk management principles at the Bank,
- compliance of the Bank's activity with laws, internal regulations and market standards.

Based on the developed selection criteria the Bank identified material processes and then linked them to the general and specific objectives of the internal control system. For material processes the Bank selected controls (control mechanisms) functioning within such processes and selected out of them certain controls of key importance for achieving the objectives of the internal control system assigned

to a given process. Key controls have been covered by the monitoring of their observance, such monitoring performed independently by organisational units belonging to the 1st and the 2nd line of defence in the internal control system.

The linking of the general objectives of internal control and specific objectives isolated as part of them with material processes functioning at the Bank and key controls and principles of independent monitoring of their observance is documented in the form of the Control Function Matrix. The Bank in the Matrix also specified the responsibility of particular organizational units for employing control mechanisms, as well as their independent monitoring.

The Bank has a formalized path of reporting about the results of monitoring controls, ascertained irregularities and status of implementing remedial and disciplining measures. From time to time this information is also transferred to the Internal Audit Department, the Bank's Management Board and Audit Committee of the Supervisory Board.

The Bank's Management Board is responsible for the implementation and functioning of an adequate, effective and efficient internal control system.

The Bank's Supervisory Board exercises supervision and performs an annual assessment of adequacy and effectiveness of internal control system (including the control function, Compliance Department, Internal Audit Department).

Internal Audit (3rd line of defence)

The Internal Audit Department is within the internal control system a specialized unit of the 3rd line of defence which carries out an independent review of processes and internal control in the Bank and the capital group, verifying the implementation of tasks assigned to the 1st and 2nd line of defence.

The aim of the activities is providing the Bank's management with an assessment of the effectiveness and adequacy of the risk management system and the internal control system, as well as adding value and streamlining processes in the Bank and the capital group. When implementing its mission Internal Audit takes into account the strategic objectives and tasks of the organization, as laid down by the Management Board and Supervisory Board of the Bank. The audit process is performed according to the Audit Charter and Internal Audit Methodology, fostering international standards of internal audit and good banking practices.

The Internal Audit Department is an independent unit, directly reporting to the Chairman of the Management Board of the Bank and the results of its activities are reported to the Management Board, Audit Committee of the Supervisory Board and the Supervisory Board of the Bank.

The activity of Internal Audit is a planned and continuous activity, resulting from the implementation of the mission and objectives, as well as the adopted Department Strategy and based on an annual audit plan. The basis of the planning process is the assessment of the risk of particular areas and processes of the Bank in order to identify increased risk and support the specification of priorities and resources for the implementation of tasks. The planning process takes into account consultations with senior management and owners of key processes. The annual audit plan is approved by the Bank's Supervisory Board and implemented on a quarterly basis by experienced and highly qualified professionals.

Internal Audit performs independent and objective assurance and consulting activities. Assurance activity is carried out as part of process audits, independent review function, branch audits, preventive audits and investigations. Assurance activity includes assessment of the adequacy and effectiveness of the risk management system and internal control system in all areas of banking activity. Advisory services are aimed at supporting the organization in achieving its goals and are provided, as far as their nature does not put under threat the independence, effectiveness and objectivity of Internal Audit's assurance activity, nor is related to the designing of control mechanisms and risk management system.

In 2025 Internal Audit Department performed audit tasks in the Bank, its subsidiaries, external entities to which the Bank, to the extent permitted by regulations, outsourced banking and bank-related

operations, as well as within the BCP Capital Group. The planned activity of the Department covered among others audits of key business and support processes and also branch audits and those of compliance with external regulatory requirements. The tasks performed by the Internal Audit Department also included investigations and prevention audits.

The results of the review of the functioning of the entire internal control system as well as its selected components, carried out by the Compliance and Internal Audit Departments in cooperation with the External Auditor, are presented cyclically and are subject to evaluation by the Audit Committee of the Bank's Supervisory Board and once a year to the Bank's Supervisory Board.

Internal Control System with respect to the Process of Preparing Financial Reports

Implemented solutions regarding the internal control system protect to a significant extent the Bank from financial reporting errors and provide the Bank's Management with information which helps evaluate the correctness, efficiency and security of the functioning of the process of preparing financial reports, also in order to ensure the highest possible effectiveness in managing identified types of risks accompanying the process.

The internal control system, introduced by the Management Board of the Bank and incorporating the financial report preparation process, has been designed to facilitate the control of process risk while maintaining appropriate supervision over the correctness of gathering, processing and presentation of data necessary for the preparation of financial reports in keeping with effective laws.

An important element of the internal control system in the process of preparing financial reports is the cooperation of the Audit Committee of the Bank's Supervisory Board with an audit firm providing financial audit services. The Bank prepared *the policy* of selecting an audit firm for carrying out an audit and policy for providing by an audit firm carrying out an audit, by entities connected with such audit firm and by a member of an audit firm network - permitted services not being an audit. The above-mentioned policies are captured in the document „*Policy of Selecting and Cooperation with Audit Firms*”, which was approved by the Audit Committee of the Supervisory Board. *The policy* specifies:

- 1) The principles of selecting the audit firm to conduct statutory audit, voluntary audit and attestation of sustainability reporting,
- 2) Principles of providing permitted services not being a statutory audit, voluntary audit or attestation of sustainability reporting by Audit Firm, entities connected with Audit Firm or member of an Audit Firm network,
- 3) Procedure of accepting performance by Other Audit Firms of services other than the statutory audit, attestation of sustainability reporting and the voluntary audit,
- 4) Principles of the Bank's cooperation with audit firms, entities connected with an audit firm or members of the audit firm network with respect to conducting statutory or voluntary audits, attestation of sustainability reporting and providing permitted services.

The external auditor is selected by the Supervisory Board on the basis of a recommendation issued by the Audit Committee of the Supervisory Board. In addition, in the interest of the quality of financial data presented in the remaining published quarterly reports, the Bank, together with the external auditor, has implemented cooperation procedures ensuring – on an on-going basis - the consultation of important issues connected with the recognition of economic events in the books and financial reports. At meetings of the Audit Committee of the Supervisory Board the external auditor presents key findings relative to financial reporting, consults with the Audit Committee of the Supervisory Board draft reports and proposes an approach to the audit of the annual financial report.

The Bank is covered by the consolidated financial report of the Millennium BCP capital group. In this connection, the annual review of the Bank's internal control system supporting the process of preparing and disclosure of financial information is also subject to the terms and requirements of consolidated supervision, which is performed by the Bank of Portugal and the European Central Bank. The external auditor of the Millennium BCP capital group participated in 2025 in review of the adequacy and

effectiveness of the part of the Bank's internal control system supporting the process of preparing and disclosure of financial information (financial reporting).

Information on the agreements with the entity authorised to audit financial reports and attestation of sustainability reporting

On February 24, 2025, the Bank's Supervisory Board approved the selection of KPMG Audyt Spółka z ograniczoną odpowiedzialnością sp.k. as the entity authorized to audit the financial statements of Bank Millennium S.A. and the Bank Millennium S.A. Capital Group for the years 2025 and 2026. The audit agreement was signed on April 10, 2025. In the previous year, the auditor was Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością sp. k. The selection of the audit firm to certify the sustainability reporting of the Bank Millennium Group for the financial year 2025 was made by the Supervisory Board in accordance with the applicable provisions of law, including the Act on Statutory Auditors and the Regulation of the Minister of Finance of 6 June 2025, in compliance with the selection procedure specified in the Bank's internal regulations. The contract for the examination was concluded on October 10 2025.

This information was prepared based on the statement of the Supervisory Board of February 6th, 2026.

Remuneration received by the auditor on account of services provided to the Capital Group of Bank Millennium S.A. in accordance with the service agreement for the year covered by the financial statement audit.

Auditor's Remuneration* (in PLN'000)	2025 (KPMG)		2024 (Deloitte)	
	Bank	Subsidiaries	Bank	Subsidiaries
Statutory audit within the meaning of art. 2 point 1 of the Act on Statutory Auditors	2,117	1,098**	1,578	721**
Other assurance services, including review of financial statements including suitability attestation	3,099	342**	2,771	252**

*The indicated remuneration amounts do not include additional cost surcharges incurred by the auditor for the supervision fee (in the amount resulting from the Act on Statutory Auditors, Audit Firms, and Public Oversight) and other costs resulting from the provision of services subject to fee.

**The data does not include the remuneration for Millennium Bank Hipoteczny S.A., which is audited by another audit firm

Services other than statutory audits performed for periods beginning between January 1, 2025 and December 31, 2025:

- review of the stand-alone and consolidated interim condensed financial reports of Bank Millennium S.A. drawn up as at June 30, 2025,
- review of the interim condensed financial reports of Millennium TFI SA investment funds prepared as at June 30, 2025,
- review procedures on the interim reporting package of Bank Millennium S.A. capital group for the period of 6 months, ended on 30 June 2025, prepared in accordance with instructions and group rules of BCP capital group,
- audit procedures on the reporting package of Bank Millennium S.A. capital group for the period of 12 months, ended on 31 December 2025, prepared in accordance with instructions and group rules of BCP capital group,
- review procedures on the interim reporting package of the Bank Millennium S.A. capital group for the period of 3 months, ended on 31 March 2025, prepared in accordance with group principles,

- review procedures on the interim reporting package of the Bank Millennium S.A. capital group for the period of 9 months, ended 30 September 2025, prepared in accordance with group principles,
- assurance service concerning requirements for safekeeping of customers' assets for 2025 for Bank Millennium S.A.,
- assurance service concerning evaluation of adequacy of the risk management system in 2025 in Millennium TFI S.A.,
- assurance service in accordance with KSUA 3000, concerning verification of the remuneration report of Bank Millennium S.A. for 2025,
- assurance service in accordance with KSUA Sustainability Reporting 3002 PL on non-financial elements with regard to sustainability reporting
- Issuance of Comfort Letter in accordance with the National Standard on Related Services 4401 PL "Engagements to perform agreed-upon procedures regarding transactions in securities which require preparation of a prospectus"
- assurance service in accordance with KSUA 3000, concerning methods and principles of valuation of assets of Millennium TFI SA investment funds
- assurance service in accordance with KSUA 3000, concerning Green Projects Portfolio of Bank Millennium S.A.

14. Additional information

14.1 Information required based on article 141 of the banking law

In 2025, Bank Millennium S.A. did not conclude any agreements referred to in Article 141(1) of the Banking Law, i.e. financial support agreements with entities subject to consolidated supervision operating within the same holding, or with closely related entities.

14.2 Significant agreements and material agreements with the central bank or supervisory authorities

Bank Millennium S.A. is required to report all agreements that meet the conditions of the definition of inside information as set out in Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse.

14.3 Information on proceedings at court, before a competent arbitration tribunal or a public administration body

As at 31 December 2025, the Group was a party to court proceedings initiated both by and against Group entities. The value of the claims in court cases in which the Group's companies acted as the plaintiff amounted to PLN 3,540.6 million (PLN 4,166.8 million as at 31 December 2024). Detailed information regarding the above court proceedings is presented in the Annual Consolidated Financial Statements of the Bank Millennium S.A. Capital Group for the 12-month period ended 31 December 2025, in section 12.1 "Court cases and significant proceedings."

14.4 Major equity Investments in entities outside the Bank Millennium Group

Apart from its capital interests in entities that are part of the Bank Millennium Group, Bank Millennium also holds shares in infrastructure companies. The most significant companies in this category of capital investments are: Polski Standard Płatności S.A., Krajowa Izba Rozliczeniowa S.A., and Biuro Informacji Kredytowej S.A. The aforementioned infrastructure companies provide services that support banking activities for both entities within the banking and financial sector, as well as services directed toward market participants, including individuals.

Name of the company	Bank's share in the share capital of the company
Polski Standard Płatności S.A.	14.28%
Krajowa Izba Rozliczeniowa S.A.	5.74%
Biuro Informacji Kredytowej S.A.	2.50%

Polski Standard Płatności S.A.

PSP is a company established in December 2013 by six domestic banks, including Bank Millennium, as part of a strategic partnership aimed at creating a shared mobile payment system – BLIK. MasterCard Europe S.A. also became a shareholder in 2020. As of November 29, 2024, the company operates as a joint-stock company.

PSP focuses its activities on operating the BLIK Mobile Payment System and Payment Scheme, both supervised by the National Bank of Poland (NBP).

Krajowa Izba Rozliczeniowa S.A.

KIR was established in 1991 by the National Bank of Poland (NBP), commercial banks operating in the Polish market, and the Polish Bank Association (ZBP). The company is a key entity in the Polish payment system, with its main area of activity being electronic clearing and payments, carried out through systems and services such as Elixir, Euro Elixir, and Express Elixir. KIR also provides tools for information exchange between authorized institutions—including the Ognivo system—as well as remote identity verification services (mojeID), and trust services, including qualified electronic seal and electronic signatures (Szafir and mSzafir).

Biuro Informacji Kredytowej S.A.

BIK was established in 1997 by the Polish Bank Association and commercial banks operating in the Polish market. BIK's activities include the collection, integration, and provision of data concerning the credit history of clients of banks, credit unions (SKOK), and non-bank lending companies. The BIK Group, which also encompasses Biuro Informacji Gospodarczej InfoMonitor S.A., is the main source of credit and business information in Poland, supporting the security of financial institutions and their clients. The BIK Group combines the attributes of a public trust institution with the competencies of modern technology companies.



Part II Sustainability Reporting

15. General Disclosures (ESRS 2)

15.1 Basis of preparation

[BP-1] This statement has been drawn up on the basis of:

- Chapter 6c of the Accounting Act of 29 September 1994 (Journal of Laws of 2023, Item 120, as amended) (“Accounting Act”),
- sustainability reporting standards as defined in Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards (“ESRS”), including the requirement that the process carried out to identify reported information is consistent with its description in sustainability reporting,
- the reporting requirements contained in Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088 (“Regulation (EU) 2020/852”).

The scope of companies covered by this statement does not differ from the scope of companies covered by financial reporting and is presented in part I of the report in section 1. *Brief characteristics of Bank Millennium and the Bank Millennium Group*. As is the case with the financial statements, this statement also takes into account any and all changes in the structure of the Bank Millennium Group. No such changes occurred in 2025. This statement does not take into account any adjustments to the information on minority interests. The information presented herein is for the period from 1 January 2025 to 31 December 2025 unless stated otherwise. This statement also considers direct upstream and downstream relationships within the Bank Millennium Group’s value chain in terms of material impacts, risks and opportunities.

In formulating this statement, the Group has exercised the option of omitting specific information pertaining to intellectual property, know-how or the outcomes of innovations. The Group has not used the exemption from the obligation to disclose information related to expected events or matters under negotiation provided for in Article 63x(7) of the Accounting Act of 29 September 1994.

[BP-2] The Group has not identified any special circumstances that would affect the scope and content of this statement.

The timeframes adopted in this statement have been defined in accordance with European Sustainability Reporting Standards (ESRS 1 section 6.4 *Definition of short-, medium- and long-term for reporting purposes*), namely:

- short-term time horizon – reporting period (1 year),
- medium-term time horizon – up to 5 years,
- long-term time horizon – more than 5 years.

For the purpose of preparing this statement, selected metrics related to the Bank Millennium Group’s value chain have been estimated. These metrics are described in the Environment part hereof in section 16. *Climate Change (ESRS E1)*, section 16.3.5 *Gross scopes 1, 2 and 3 and total GHG emissions*.

The Group has identified changes related to the methodology of calculating greenhouse gases GHG emissions, which was described in the Environment part hereof in section 16. *Climate Change (ESRS E1)*, section 16.3.5 *Gross scopes 1, 2 and 3 and total GHG emissions*. It has not identified material errors in the preparation and presentation of sustainability information compared to the previous reporting period.

Some of the disclosures have been incorporated by reference in accordance with ESRS 1 section 9.1 *Incorporation by reference*. A table listing these is provided below:

List of references

No.	ESRS requirement	ESRS data point	Document to which the reference is applied
1.	BP-1 – General basis for preparation of the sustainability statement	BP-1: 5	Part I Management Board Report on Activity Section 1. <i>Brief characteristics of Bank Millennium and the Bank Millennium Group</i>
2.	SBM 1 – Description of the business model and value chain	SBM-1: 42	Part I Management Board Report on Activity Section 1. <i>Brief characteristics of Bank Millennium and the Bank Millennium Group</i> Section 2. <i>Summary of the BM Group's consolidated results in 2024</i> Section 8. <i>Financial standing</i> Section 9. <i>Description of business</i>
3	SBM-1 – Strategy, business model and value chain	SBM-1: 40 b	Part I Management Board Report on Activity Section 2. <i>Summary of the BM Group's consolidated results in 2024</i> Section 8. <i>Financial standing</i>
4	GOV-1 – The role of the administrative, management and supervisory bodies	GOV-1, 22a	Part I Management Board Report on Activity Section 13.3 <i>Supervisory Board</i> Section 13.4 <i>Management Board</i>

In the second year of preparing the statement, the Group applies the exemption provided for by the amendment to the first set of ESRS under the so-called “Quick-fix” (in the form prescribed by Commission Delegated Regulation (EU) 2025/1416) and does not present disclosures on the anticipated financial effects arising from material physical risks and transition risks and potential climate-related opportunities (disclosure requirement ESRS E1-9). The management of the potential financial effects of material risks and opportunities is part of the Group’s day-to-day activities. All financial information related to the risks and opportunities managed by the Group is disclosed in *the Annual Consolidated Financial Report of the Bank Millennium S.A. Capital Group for the 12-month period ending 31st December 2025*.

15.2 Business model and value chain

15.2.1 Business model

[SBM-1] Bank Millennium and its subsidiaries make up the Bank Millennium Group. The Bank Millennium Group offers services in the retail segment, that is to individual customers and micro-enterprises, and, within corporate banking, to small, medium-sized and large companies. The Bank Millennium Group successfully competes in all segments of the financial market.

The Bank and its subsidiaries operate in the Republic of Poland, treated as the Group’s area of business, and therefore all disclosures included in this statement refer to Poland. With 7,023 employees (as at 31 December 2025; at the end of 2024, the headcount was 6,836 employees), the Group operates throughout Poland and has no branches outside of its borders. No changes occurred in the markets or customer groups served during the reporting period.

The Bank Millennium Group achieves its economic goals while striving to balance the needs of key stakeholders, in accordance with the Group’s growth strategy, taking into account the principles declared in the *Bank Millennium Group Code of Ethics (Code of Ethics)*. Information on the structure of costs and revenues generated by the Bank’s Group, along with the results posted by each segment, is provided in part I in section 8. *Financial standing*.

The Bank Millennium's mission is to support its customers in the achievement of financial success now and in the future. The Bank builds its competitive advantage on values forming the basis for running its business.

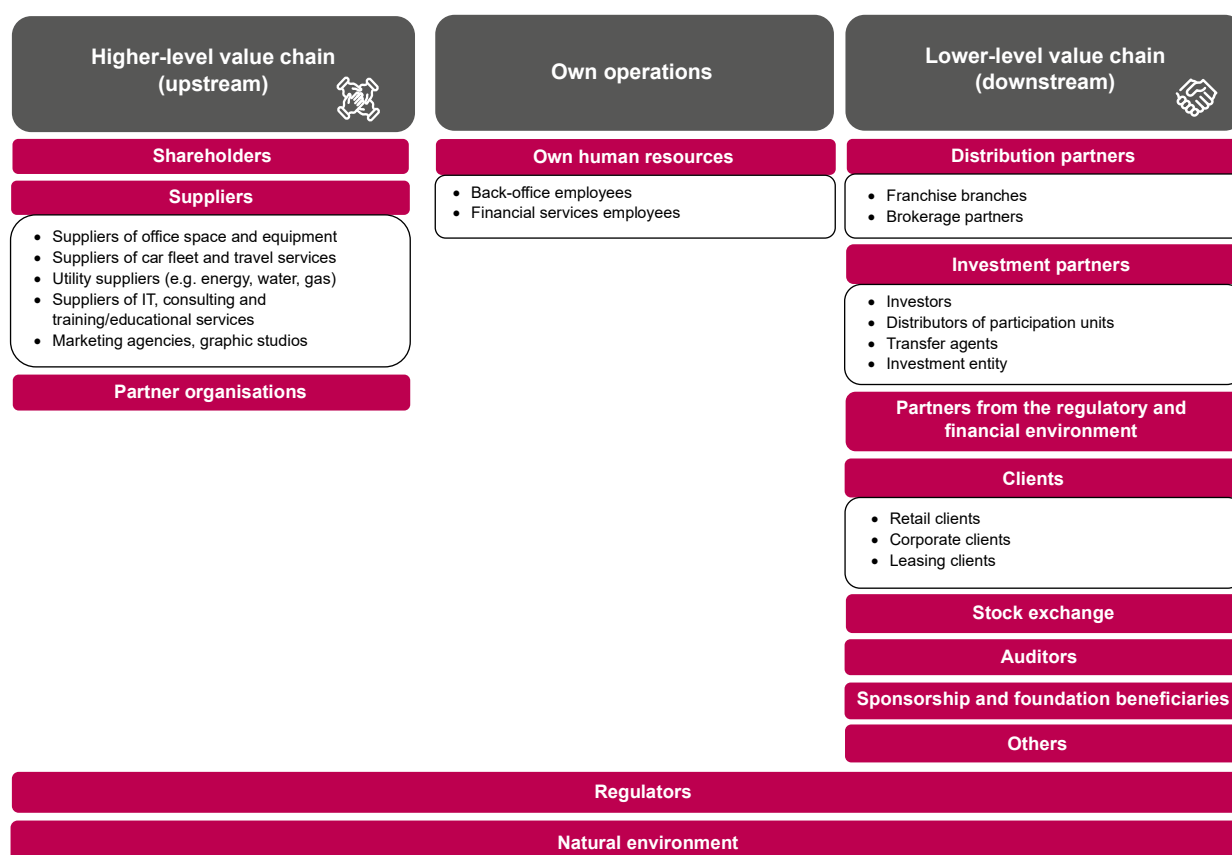
- we build relationships based on trust,
- quality and innovation are our passion,
- we develop employees and we promote cooperation
- and we always aim higher.

Details of the Bank's business model are described in part I of this report in section 1. *Brief characteristics of Bank Millennium and the Bank Millennium Group*. The information on the business model is expanded in section 9. *Description of business* in part I, containing an explanation of the customer service channels and the product offering for retail and corporate banking customers. The structure of costs and revenues generated by the Bank and the Group is provided in sections: 2. *Summary of the BM Group's consolidated results in 2025*, 8. *Financial standing*.

15.2.2 Value chain

The core business of the Bank Millennium Group is banking activity, therefore the key stage of its value chain is the downstream part, which comprises the Bank's relationships with its customers. Within the value chain analysis, other material stakeholder groups have also been identified, such as employees and business partners (including franchisees), as well as other relevant groups.

Key areas of the value chain



The impacts, risks and opportunities and their interconnections with the business model and value chain are presented in section 15.5.5 *Material sustainability-related impacts, risks and opportunities* and in section 8.2 *Results of business segments*.

A detailed description of our business model and value chain is provided in part I. Management Board Report on Activity, in sections: 1. *Brief characteristics of Bank Millennium and the Bank Millennium*

Group, 2. Summary of the BM Group's consolidated results in 2025, 8. Financial standing, 9. Description of business.

15.2.3 Key stakeholders

Engagement with interested parties (stakeholders) affected by the entity plays a fundamental role in the ongoing due diligence process carried out by the entity. Stakeholders are parties that may affect or be affected by the Bank Millennium Group's actions. Stakeholders are broken down into two the following main groups:

- a) stakeholders affected by the Bank Millennium Group: individuals or groups whose interests are or may be affected, positively or negatively, by our activities and the Group's direct and indirect business relationships across the value chain, and
- b) users of sustainability reporting: primary users of financial reporting for general purposes (existing and potential investors, lenders and other creditors, including asset managers, credit institutions, insurance companies) as well as other users of sustainability statements, including our business partners, trade unions and social partners, civil society, NGOs, governments, analysts and academics.

[SBM-2] The Bank Millennium Group conducts its business taking into account the views, interests and rights of the key stakeholders it impacts, which include:

1. Employees and the trade unions that represent them
2. Key business partners (franchisees, brokers, product and service providers)
3. Our customers (corporate and retail)
4. Investors holding more than 5% of Bank Millennium shares, including our major shareholder Banco Comercial Português (BCP)
5. Natural environment (also referred to as a silent stakeholder represented by environmental organisations).

The identification of our material stakeholders has been carried out in the course of a double materiality analysis taking into account the analysis of the Bank Millennium Group's operational activities and based on interviews with employees.

Employees of the Bank Millennium Group

[SBM-2] A significant pillar of our business model is creating a welcoming workplace for existing employees. We see employee engagement and satisfaction as key prerequisites for achieving the goals we set and the success we achieve as well as for the long-term development of our organisation. We conduct annual satisfaction surveys of our employees. Their outcomes are meticulously examined in order to make necessary changes to the relevant processes. Employee satisfaction surveys are prepared by the Quality Department together with the Human Resources Department. Employees may report violations of the provisions of law and internal regulations. The Bank's Management Board is informed about identified violations in quarterly reports prepared by the Compliance Department.

Employees may also share their comments and opinions on the Millennium World corporate intranet. Additionally, under the agreements in place, the Bank and the trade unions agree on internal regulations relevant to employees, such as compensation regulations, bonus regulations, remote work regulations and the social fund spending plan. The Bank also consults with the trade unions on case-by-case employee issues.

These communication methods enable us to obtain information from all employees – our own personnel (head office and own branches) and those working in the value chain. Information about interests, views and rights obtained in this way is thoroughly analysed and used to make adjustments to our business model and strategy.

Our customers

[SBM-2] Bearing in mind our business model in which we focus on a tailored offering to our customers and the highest quality of customer service, the identification of customer needs is an ongoing, initial element of every project. Research is carried out on samples of retail and corporate banking customers.

In 2025, Bank Millennium conducted quantitative and qualitative research in the area of market trends and specific assumptions in the area of products and service quality. This information is supplemented by projects using the Service Design methodology, in which a full understanding of customer needs plays a key role. The results of the research are presented to the relevant business units as well as at a special meeting – the CX Forum, which is held continuously and on a regular basis with selected members of the Management Board. The purpose of these meetings is to show current information on how the Bank's customers evaluate products and services as well as to make decisions on how to improve the customer experience. This research is performed regularly in order to maintain the quality of service at the highest possible level in every service channel and observe trends occurring on the financial services market. In order to continuously improve the product offering and the quality of customer service, the Bank also analyses customer requests and complaints. Details related to this form of cooperation with customers is presented in sections *19.2 General customer engagement processes* and *19.9 Remediation of negative impacts*.

In 2025, information obtained from stakeholders, including from the employee satisfaction survey and from surveys conducted among customers, was an important factor in decisionmaking, for example in the introduction of full digitalisation of the business travel management process, the launch of the Mindgram wellbeing platform for employees, and the implementation of the *Twój Cel* Savings Account.

15.3 Sustainability strategy

[SBM-1] Sustainability plays a significant role in our strategy and has served as one of its pillars for years. These activities continue and are also included in the *Bank Millennium and Group's Strategy for 2025-2028*, entitled "*Strategy 2028 – Value and growth*" ("*Strategy 2028*"). The Strategy addresses all major groups of our products and services, that is those offered to both retail and corporate customers.

As part of Strategy 2028, we are continuing the initiatives related to the adopted carbon footprint targets and support our clients in their low-carbon transition journey.

As a socially responsible institution, we emphasise the significance not only of the achievement of the objectives provided for in our Strategy, but also of the means by which such achievement is materialised – with a commitment to society and the environment, in line with stringent standards of quality and ethics in the sales process and the services offered. In our Strategy, business objectives and ESG goals form a coherent whole. One of the most important aspects of our efforts is the fact that we are engaged in pursuing them together as the Bank Millennium Group. We act jointly with our stakeholders: employees, customers, business partners and shareholders. We will also achieve the objectives adopted in our Strategy by investing appropriately in our key assets: people and technology and will continue to build our position as an attractive employer for top talent in our strategically vital areas.

Our sustainability-related activities in *Strategy 2028* have been categorised into the following three areas:

- Environmental (E)
- Social (S)
- Governance (G)

In the environmental area, our objectives are:

- **To strive for zero emissions**, that is to achieve climate neutrality in scopes 1 and 2 by 2030¹ and to achieve full climate neutrality, including in scope 3 emissions, by 2050.

We are gradually reducing our carbon footprint by continuing our energy efficiency initiatives across our branches, increasing the share of zero-emission vehicles in our fleet, maintaining 100% electricity with guarantees of origin and adopting a *Transition Plan* (including decarbonisation targets and actions) by 2026.

¹ Emission reduction activities will continue, but offsets may be applied for the remaining emissions.

- **Sustainable financing**, that is supporting customer transition and growth by providing sustainable financing – we have planned to **provide PLN 5 billion in financing** for sustainability projects.

We intend to achieve this goal by providing sustainable financing to companies, raising awareness and expertise on public programmes/green projects, maintaining a policy of providing no financing to the mining and carbon-based energy generation sectors, expanding the green retail offering and portfolio of sustainable assets at Millennium TFI, and continuing initiatives to raise customer awareness of sustainability.

In the social area, our objectives are:

- **Best employer**, that is nurturing the well-being and professional development of our employees as well as promoting diversity, equality and inclusion across our business operations and beyond. We will ensure that we continuously improve employee satisfaction and maintain our Top Employer certification.

Our activities in this area include implementing initiatives that respond to the outcomes of the Employee Satisfaction Survey, further developing a transparent remuneration policy, continuing the measures to address the gender pay gap, promoting a culture of continuous learning, continuously improving initiatives that affect the well-being of our people, and strengthening the culture of diversity, equality and inclusiveness (DEI) in our organisation.

- **Inclusive and accessible banking** that provides secure access to financial services for all customers, embracing their diversity. We will expand our offering for customers and, with a view to maintaining the high quality of service accessibility, we will continue to work with external expert institutions.

The activities we carry out in this area include the continuation of improvement in ensuring the accessibility of services and education for customers, promotion of regular savings and investments, deployment of dedicated solutions for young customers, and provision of financial education to children through the Bank Millennium Foundation's initiatives.

- **Community engagement**, that is supporting local businesses by financing and providing business tools and engaging employees in community activities as well as promoting cultural development.

We are pursuing this objective by developing a financing programme for micro and small businesses, offering educational initiatives for micro and small businesses, further developing the Bank Millennium Foundation's employee volunteerism grant programme and maintaining our position as an ambassador of culture in Poland (including by continuing to support the Millennium Docs Against Gravity film festival).

In the Governance area, our objectives are:

- **ESG risk management**, by developing a methodology for measuring the financial impact of ESG risks and improving ESG risk management processes in support of the Transition Plan. In 2025, we conducted work on evaluating the anticipated financial effects and scenario analysis, which enabled a successful performance of a climatic stress test in the credit risk area.

To meet this target, we carried out specific measures: enhancing ESG risk assessment and management coupled with further integration in the lending process, implementing ESG risk measures in the Risk Appetite Statement (RAS), monitoring climate risk exposures, developing methodologies and conducting climate stress tests with scenario analysis, and supporting the Transition Plan through ESG risk management.

Maintaining high standards of corporate governance based on solid ethical foundations and a mature approach to ESG issues management. These measures are intended to support the Group's sustainable growth and ensure compliance with existing and new regulations, including through the timely implementation of ESG requirements and further improvement of reporting processes in line with the evolution of reporting standards. We are striving to achieve this goal

through implementation of new regulatory requirements, alignment of our internal processes, ongoing review and application of existing ESG regulations, further development of ESG data management and comprehensive ESG awareness-building initiatives.

The pursuit of the Bank's Strategy, including the key success factors of which sustainability is a pillar, is subject to a continuous monitoring process under the Bank's internal management system. Our progress in going after the strategic ESG initiatives is monitored on an ongoing basis by the Sustainability Committee. This process is described in more detail in section *15.4 Sustainability management*.

Strategy 2028 is available on the Bank's website at:

www.bankmillennium.pl/documents/d/guest/bankmillennium_strategia2025_2028

The Group offers financial products that relate to sustainability issues:

1. Corporate customers:

To support companies in achieving sustainability goals, we are developing our loan portfolio by providing customer-tailored offers and helping them obtain support from public programmes. The Group offers its customers:

- **Biznesmax Plus Guarantees** – free guarantees securing up to 80% of the loan amount financing innovative and eco-innovative investments.
- **Ekomax Guarantees** – investment loans with Ekomax guarantees, which can secure up to 80% of the loan amount financing energy efficiency projects, consisting in thermal modernisation of buildings or reduction by at least 30% of primary energy consumption.
- **Investmax Guarantees** – guarantees under the European Investment Fund from InvestEU Programme funds.
- **Environmental Loan**, which supports companies' transition to improve energy efficiency through infrastructure modernisation and new technologies.
- **Photovoltaic Loan** – an investment loan for companies to purchase photovoltaic (PV) installations for their own business needs.
- **A loan with a KUKE Green Guarantee** for the financing of domestic investments related to the energy transition.

Thanks to public funding guarantees, we offered clients longer-than-standard financing periods for working capital loans and reduced the borrower's minimum contribution to 10% for investment loans. We also waived the preparatory fee for sustainability-related financing.

Additionally, in the corporate banking area, clients receive dedicated relationship manager support, and where appropriate, substantive assistance from our experts operating within the EU Funds Competence Centre, who collaborate with clients to develop the most advantageous investment financing structures.

Millennium Leasing offers to its customers:

- **MilleSun Programme** to finance equipment to generate energy from renewable sources.
- **"NaszEauto" Programme** implemented by the National Fund for Environmental Protection and Water Management (NFOŚiGW) supporting the leasing of zero-carbon passenger cars.
- **Eco-friendly Asset Leasing** – preferential programme financing nearly 40 groups of environmentally friendly assets, including: energy-efficient machinery and equipment, low-emission transport, technologies for generating and storing energy from renewable sources.

2. Retail customers:

To support customers in choosing sustainable solutions, the Bank has introduced the "EKO Mortgage Loan" for individuals purchasing or building apartments or houses with low primary energy demand. The offer covers properties on both the primary and secondary markets, provided the building meets specified energy efficiency standards. Through this offer, customers benefit from more favourable credit

terms, while the Bank supports the development of energy-efficient construction projects, enabling a reduction in the emission intensity of its credit portfolio.

Millennium TFI offers Subfunds based on sustainability criteria. The offer includes three Subfunds separated within the Millennium Specialized Open-End Investment Fund in accordance with the requirements of Article 8 of the SFDR². They promote environmental, social and corporate governance aspects (as so-called light green products) by including them in the investment selection criteria and by applying certain investment restrictions. In addition, they take into account the Principal Adverse Impacts (PAI) of investment decisions on sustainability factors. The Subfunds are structured as funds of funds:

- **Plan Spokojny Subfund** – which invests mainly in global debt instruments.
- **Plan Wyważony Subfund** – which balances investments in global debt and equity instruments.
- **Plan Aktywny Subfund** – which invests mainly in global equity instruments.

The share of sustainable financing in the Bank's assets, in accordance with the GAR, is specified in section 21. *Disclosures under EU Taxonomy (Article 8 of Regulation (EU) 2020/852)*.

15.4 Sustainability management

15.4.1 Governance structure

[GOV-1] [GOV-2] [G1 GOV-1] The basis for defining the approach to sustainability management is the agenda formulated by the United Nations that includes 17 goals. In 2017, Bank Millennium signed a declaration to support the implementation of the UN Sustainable Development Goals. In its business, it is guided by all 17 goals, with a special emphasis on:

- 3. Good health and well-being
- 4. Quality education
- 5. Gender equality
- 8. Decent work and economic growth
- 9. Industry, innovation and infrastructure
- 13. Climate action
- 17. Partnership for the goals

In Bank Millennium, actions taken with sustainability in mind have formed an integral part of our business strategy for years. The ESG area is also included in the new Group Strategy for 2025-2028 adopted by the Management Board and approved by the Supervisory Board. This is discussed in detail in section 15.3 *Sustainability strategy*.

Sustainability policies

Bank Millennium has laid down the fundamental sustainability-related principles at the level of the whole Bank Millennium Group in the *Sustainability Policy of Bank Millennium S.A.* adopted by the Bank's Management Board, of which the following documents, published on the Bank's website (www.bankmillennium.pl/o-banku/esg#zasady-esg), form an integral part:

- *Policy on Sustainability Principles*
- *Anti-Corruption Policy*
- *Social Impact Policy*
- *Human Rights Policy*
- *Diversity Management Policy*
- *Corporate Volunteering Policy*
- *Environmental Policy*
- *Responsible Financing Policy*

Moreover, the *Supplier Sustainability Guidelines* designed for the Group's suppliers are available on the website.

² Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation, hereinafter "SFDR").

The *Sustainability Policy of Bank Millennium S.A.* integrate environmental, social and governance dimensions, including:

- Aligning decision-making, in all areas of the Bank Millennium Group, with the pursuit of the UN Sustainable Development Goals, as well as universally applicable laws and national and international sustainability standards.
- Taking into account the UN Sustainable Development Goals in the development and offering of financial products.
- Transparency of disclosures regarding the conduct of sustainability activities undertaken by the Bank Millennium Group.
- Building awareness among employees, customers and other stakeholders of the Group in the sustainability area.
- Adherence to the highest standards of operation, including the Corporate Governance Principles for Supervised Institutions and the Best Practices for WSE Listed Companies, and striving to continuously ensure full compliance with generally applicable laws and business conduct standards.
- Building partnerships and an ongoing commitment to working with communities – both external and internal – in the search for opportunities to create social value by supporting cultural, educational and financial literacy initiatives as well as employee volunteerism activities.

Based on the UN Sustainable Development Goals, the commitments arising from Diversity Charter signed by the Bank, as well as internal policies and best practices, we have made the following commitments:

- Integrate environmental and social risks into our customer risk assessment process and include ESG risk factors in sector policies for corporate clients.
- Define a list of sectors and activities to which no financing will be provided by the Bank Millennium Group – the Group identifies business sectors or projects the financing of which is not consistent with the Bank Millennium Group's commitment to protect the environment, promote sustainability, contribute to climate action and preserve biodiversity. For this reason, the Bank Millennium Group has identified sectors excluded from financing or sectors that may receive only conditional financing (the financing of activities or projects in these sectors may be granted only if additional conditions have been fulfilled).
- Finance environmentally friendly and energy-efficient projects, including projects related to the replacement of coal based electricity generation with low-carbon energy sources.
- Carry out activities aimed at reducing the carbon footprint.
- Respect for human rights – the Bank Millennium Group takes into account and promotes the fundamental principles of human rights by applying ethical business practices towards various stakeholder groups, including employees, customers, shareholders, suppliers and local communities. Such practices are clearly defined in the Bank Millennium Group's relevant internal regulations.
- Develop sustainability competencies – we offer training and initiatives for employees to grow their sustainability competencies.
- Promote a culture of responsible consumption – the Bank Millennium Group has adopted, as part of its Sustainability Guidelines for Suppliers, a set of requirements for suppliers where sustainability issues are covered.
- Influence society – promote a culture of social responsibility, develop activities for and with various stakeholder groups, while directly or indirectly supporting social development.

These commitments of the *Sustainability Policy of Bank Millennium S.A.* apply to all activities and business relationships of the Bank Millennium Group.

The Bank Millennium Group also has in place the *Bank Millennium Group's Responsible Purchasing Policy*.

Moreover, Bank Millennium has also the *Policy for preventing greenwashing* in place. The document sets out the basic policies and guidelines related to the process of preventing greenwashing, namely:

1. Make sure that any statements made by the Bank on the topic of sustainability are true, clear, based on reliable data and evidence, and not misleading.
2. Ensure that its sustainability statements are not misleading.
3. Do not omit significant sustainability information.
4. Use clear and transparent communication regarding sustainable products and services and ensure that claims about the environmental friendliness of a product or service are truthful, contain no falsehoods, and presented in a clear, specific, accurate, and unambiguous manner so as not to mislead recipients.
5. Clearly and precisely communicate all conditions and criteria for classifying products offered by the Bank as sustainable (including green).
6. Ensure compliance of activities with sustainability regulations and sustainability reporting standards.

The Bank's Management Board is responsible for the effective management of the Bank's sustainability area, in terms of environmental, social and governance issues, including responsibility for developing, approving and updating the organisation's sustainability-related goals, values, mission, strategies, policies and targets. The Bank's Supervisory Board oversees this process. The governance arrangements adopted in the Bank Millennium Group do not involve assigning responsibilities, tasks or powers in respect to one-off impacts, risks and opportunities identified in the double materiality analysis.

The Management Board approves sustainability reporting and sustainability-related policies. Sustainability-related policies are approved by the Management Board in accordance with the schedule for updating such documents, but not less frequently than once every two years. Sustainability reporting is also approved by the Supervisory Board.

Within the Management Board, the sustainability area is overseen by the President of the Management Board, while ESG risk management is overseen by the Bank's Management Board member responsible for risk.

The Management Board is provided with information to control and oversee the processes aimed at identifying and managing the economic, environmental and social impacts of the Group, including periodic reports on the achievement of targets in all key areas of the Bank's operations. To this end, the Management Board's control activities are also carried out by committees established within the Bank's structures. In this process, information obtained from the Bank's stakeholders is also taken into account, such as that regarding employee matters or issues arising from complaints or customer service surveys. For instance, the Process and Operational Risk Committee prepares reports on customer complaints and actions taken by the Bank on issues identified in the complaint handling process and reports on the quality of the customer service process and studies of customer needs. The Sustainability Committee also plays a key role in this regard.

The Supervisory Board also receives, on a quarterly basis, in some instances through its committees, information on key aspects of the Bank's business, including aspects related to its economic, environmental and social impacts. Moreover, the Supervisory Board performs a global assessment of the Bank's activities, including the management of economic, environmental and social issues, based on the Bank's annual reports. They are analyzed and presented to the Shareholder Meeting and form the basis for granting a discharge to the Bank's Management Board on the performance of its duties in a given financial year.

Sustainability Committee

The Bank has the Sustainability Committee and the Sustainability Department.

The Bank's Management Board participates in the process of managing sustainability issues through its full representation in the work of the Sustainability Committee. The Committee is composed of all members of the Bank's Management Board, as well as representatives of the units performing tasks related to sustainable development in the Bank and the Bank Group. The Sustainability Committee is chaired by the President of the Management Board. The Committee meets at least quarterly.

The Committee's scope of work includes participation in the development of proposals for the Bank's strategic initiatives in the area of sustainability, adoption of operational plans related to the execution of strategic sustainability initiatives, monitoring and evaluation of the pursuit of planned activities in terms of their completeness and quality, meeting the required deadlines and the planned budget, approving and monitoring metrics related to strategic sustainability initiatives. Committee meetings also discuss the most relevant ESG issues on an ongoing basis, including those related to the management of identified material impacts, risks and opportunities.

The Sustainability Department is overseen directly by the President of the Management Board. The purpose of the Sustainability Department is to oversee and coordinate the observance of sustainability principles within the Bank and the Bank Millennium Group. The Department's scope of tasks includes coordination of work related to the sustainability strategy, cooperation with other units of the Bank and Group entities in the pursuit of sustainability principles, ensuring identification of risks related to climate change in the Bank's activities, cooperation with other units of the Bank in the roll-out of sustainable products, and promotion of sustainability principles among the Bank's employees.

At the same time, the Risk Department is responsible for integrating ESG risks into the Bank's risk management system. The Risk Department's key tasks include consideration of ESG risk within the risk appetite, analysis of the materiality of the impact of ESG risk on the Bank's risk profile, development of ESG risk assessment methodologies within the framework of existing risk assessment methodologies and processes, and monitoring the impact of ESG risk on the area of capital adequacy.

Risk Committee

The Bank has also established a Risk Committee, which is responsible for risk control, including for reviewing the principles, policies, rules and practices related to risk management, also by managing ESG risks and making decisions on key elements of lending policy, including those related to ESG risks. The Risk Committee, which comprises all members of the Management Board, prepares quarterly summary information and materials for the Supervisory Board Risk Committee and the Supervisory Board, addressing key issues related to the impact of risks – including ESG risks – on the Bank's overall risk profile. The Committee meets on a monthly basis.

Moreover, sustainability activities (including the management, control and monitoring of impacts and related activities) in the distinct areas of competence are the responsibility of other units of the Bank and the Bank Group in accordance with their areas of responsibility. These activities form an integral part of the business and distinct areas of activity are assigned to employees holding senior management positions (those reporting directly to the Management Board President or Management Board members of the Bank or the pertinent Group companies).

The Bank's Management Board and Supervisory Board

Information on the composition of the administrative, management and supervisory bodies, their roles and responsibilities and their access to expertise and skills, including a description of the powers of members of the Bank's Supervisory Board and the Bank's Management Board relevant, among other aspects, to the management of the company's economic, environmental and social impact, are described in part I of this report in sections *13.3 Supervisory Board* and *13.4 Management Board* as well as on the Bank's website: www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance

Annually, Bank Millennium conducts a suitability assessment of each member of its corporate bodies and evaluates the collective suitability of those bodies, based on the provisions of the Banking Law, the EBA/GL/2021/06 Guidelines from European Banking Authority (EBA) and European Securities and Markets Authority (ESMA) on assessing the suitability of members of the management body and people performing key functions, the methodologies for assessing the suitability of members of the bodies supervised by the Polish Financial Supervision Authority and the policies in force in the Bank for selecting and conducting suitability assessment of Supervisory Board and Management Board members.

Supervisory Board

The Bank's Supervisory Board has 12 members. In connection with the expiry of the Bank's Supervisory Board's term in 2025, on 27 March 2025 the Shareholder Meeting appointed the Supervisory Board for a new term. In 2025, there were personnel changes in the composition of the Bank's Supervisory Board. The current composition of the Supervisory Board consists of 6 women and 6 men, resulting in an

average ratio of women to men among Supervisory Board members of 50% (in 2024, the Supervisory Board consisted of 3 women and 9 men; the average ratio of women to men among members was 33.3%). Currently, the Supervisory Board has 7 independent members (58%), while there were 5 independent members (42%) sitting on the Supervisory Board in the previous year. There are no employee representatives on the Supervisory Board, as was the case in the previous year.

In the course of suitability assessment, the individual and collective competence profiles of the Supervisory Board members were examined and it was concluded that the Supervisory Board members – both individually and collectively – meet the expected competence requirements. In particular, the diversity of the composition of the Supervisory Board in terms of age, gender, professional experience, knowledge and skills and the fact that it includes both business representatives and academics reflect due care in ensuring that the Supervisory Board's views on the performance of the Management Board are as diverse as possible. Among the required competencies of the Supervisory Board members, those related to sustainability were also evaluated. The *Methodology for assessing the suitability of members of corporate bodies of supervised entities – Polish Financial Supervision Authority* is applied to evaluate such competences. Moreover, the level of competence is appraised using a scale that takes into account factors such as knowledge, experience and practical skills in the respective area.

Seven members of the Bank's Supervisory Board, including its Chairwoman, are Polish citizens. Seven of the Supervisory Board members are not related to any shareholder with at least 5% of the Bank's shares. In the previous year (i.e. in 2024), seven members of the Supervisory Board, including its Chairman, were Polish citizens. Seven of the Supervisory Board members were not related to any shareholder with at least 5% of the Bank's shares.

Management Board

The Bank's Management Board consists of 7 people. In connection with the expiry of the term of the Bank's Management Board, on 27 March 2025 the Bank's Supervisory Board appointed the Management Board for a new term. The Bank's current Management Board consists of 2 women and 5 men, resulting in an average ratio of women to men among Management Board members of 29% (in 2024, the Bank's Management Board was not gender-diverse - all of the Management Board members were men). As part of suitability assessment, the competence profile of the Management Board in terms of general management, risk management, knowledge of business lines and soft skills was evaluated. The individual profiles and the collective competence profile were compared and it was concluded that the Management Board meets the expected competence requirements. The composition of the Management Board fulfills the diversity criteria in terms of professional experience, in particular in terms of experience gained in different markets (Polish and Portuguese markets), education, age and gender, thus enabling different views to be presented while managing the Bank. Four Management Board members are Polish citizens.

Members of the Bank's Management Board and members of the Management Boards of Bank Millennium Group companies undergo training, consistent with their roles, knowledge and experience. Such training is designed to enhance their knowledge, skills and experience in the sustainability area.

In 2025, the members of the Bank's Management Board and members of the Management Boards of Bank Millennium Group companies took part in workshops delivered by an external firm regarding the preparation and implementation of the *Transition Plan*. All members of the Bank Millennium Management Board are members of the Sustainability Committee. During its quarterly meetings, all issues related to sustainability at the Bank are discussed and addressed. This also applies to new Management Board members appointed in 2025.

Information provided to administrative, management and supervisory bodies and sustainability issues pursued by them

The Sustainability Committee is responsible for monitoring sustainability-related issues. The Committee's powers are described in this section. The Sustainability Committee meets at least quarterly.

During the Committee's meetings, the range of issues discussed includes the progress made in implementing the sustainability strategic goals as well as ongoing activities carried out by the Bank in this area. The Bank's Management Board is provided with relevant information about all sustainability issues through the direct participation of all Management Board members in the Sustainability Committee meetings.

In 2025, key sustainability issues were presented at the Sustainability Committee meetings. The topics covered during the reporting period encompassed all relevant risks, impacts, and opportunities, including issues related to monitoring and implementation of the ESG strategic targets, such as:

- The net zero ambition, including preparation of the Transition Plan
- Supporting customers in their transition and growth through sustainable financing
- Supporting customers in their business development and finance
- Educational activities in the area of ESG and security.
- Development, support of and care for the well-being of our employees
- Promotion of gender equality and diversity
- Development of inclusive and accessible banking
- Charitable activity and support for culture
- Sustainability reporting and planned regulatory changes in this area
- Further development in the ESG area
- Actions to prevent greenwashing
- ESG risk management

Furthermore, other topics discussed during the Committee's meetings included current relevant issues related to the ESG area and ESG risk management, interactions with regulators in the ESG area, changes in internal regulations of sustainability and ESG risk. Members of the Sustainability Committee were informed of the progress of the work ongoing in 2025 related to the adoption of ESG measures and objectives for 2025.

Sustainability-related issues are also addressed at the monthly Risk Committee meetings the participants of which include all members of the Bank's Management Board.

In 2025, key ESG risk management issues were presented at the Risk Committee meetings, including the following:

- Including ESG metrics as part of the regular monitoring of risk appetite.
- Approving an update to the *Risk Management and Control Principles at the Bank Millennium Group* document concerning climate risk as a risk factor and updated related to ESG risk considerations in the risk management process.
- Approving the Climate & Environmental (C&E) Materiality Assessment methodology.
- Approving the C&E Materiality Assessment for 2025 as part of the Risk Strategy for 2026-2029.
- Updating the principles of considering ESG factors in the credit process (in retail and corporate banking segments).
- Introducing changes to credit policy in the corporate banking area (updating the assessment of transition risk and social risk and the list of sectors excluded from financing and sectors with financing restrictions).
- Approving the results of the business environment analysis in the context of ESG factors (BEAR).
- Approving the results of the climate stress test performed for credit risk and conclusions from the integration of C&E factors in the ICAAP process.

The Risk Committee periodically reports to the Bank's Management Board on key issues related to the impact of risk - including ESG risk - on the Bank's overall risk profile.

In 2025, the Bank's Management Board approved the results of double materiality analysis. It also took an active part in the preparation of the *Transition Plan*, which it then approved in January 2026.

In 2025, the Supervisory Board Audit Committee received information on sustainability reporting every six months starting with the first quarter of 2025. Furthermore, the Supervisory Board Audit Committee took note of the results of the double materiality analysis approved by the Bank's Management Board. The Committee meets once every quarter.

The Supervisory Board Risk Committee received regular information on risk appetite metrics, including those related to the ESG area. The Committee also familiarized itself with the update of methodologies to assess the materiality of ESG risks. The Committee meets once every quarter.

In 2025, the Supervisory Board participated in the oversight of the sustainability area through the Committees described above as well as by accepting Sustainability reporting of Bank Millennium and the Bank Millennium Group for 2024. On a quarterly basis, the Supervisory Board also received

information on Risk Appetite Statement (RAS) metrics, including those related to the ESG area. In the first quarter of 2025, the Supervisory Board approved the selection of the sustainability reporting auditor.

15.4.2 Taking sustainability-related performance into account in incentive schemes

[GOV-3] Sustainability-related performance is taken into account in the incentive schemes applied as part of the Bank's employee compensation policies. Such incentive schemes apply to members of the Bank's Management Board and key managers involved in the pursuit of strategic initiatives in the ESG area.

The rules for compensating members of the highest governance bodies are set forth in the *Compensation Policy for Bank Millennium S.A. Management Board and Supervisory Board Members*. Senior management (employees identified as exerting a material impact on the Group's risk profile, also known as Risk Takers) are subject to the provisions of the *Compensation Policy for Risk Takers in the Bank Millennium Group*. The policy aims to provide a formal framework for determining the compensation of all the Group's employees from the perspective of corporate governance, institutional safety and the suitability of compensation to the Group's standing, scale of operation and growth potential, by defining fixed and variable compensation elements. The terms and conditions of employee compensation, including incentive schemes, are updated and approved by the President of the Management Board on an annual basis. The terms and conditions of compensation payable to Management Board members are approved by the Supervisory Board Personnel Committee.

The compensation principles put in place have been formulated in such a manner as to avoid creating incentives that might incline people to engage in activities and take decisions that pose a threat to the Bank's long-term welfare and transcend the acceptable risk profile, to take actions at odds with the best interests of the Group's customers and investors and to introduce risks to sustainable development in the activity of Group companies.

Such (and amendments thereto) are approved by the Bank's Supervisory Board.

[E1 GOV-3] [GOV-3] As regards members of the Management Board and senior management, their performance is appraised in relation to all adopted strategic sustainability objectives. For 2025, the benchmarks were set in the form of ESG objectives defined in *Strategy 2028* www.bankmillennium.pl/documents/d/quest/bankmillennium_strategy2025_2028?mv=30 - pages 29-30. The aspect assessed is the degree of delay in the pursuit of the strategic initiatives undertaken to pursue specific goals. The assessment is made with reference to the adopted benchmarks (% of delays). In 2025, among the initiatives assessed (in terms of the timeliness of their implementation) were climate-related issues such as the pursuit of climate neutrality and supporting customer transition and development through sustainable financing. Moreover, in the case of the Management Board members, the achievement of the objective *Initiatives with social impact in PLN millions* is also evaluated in relation to the value threshold adopted.

The Management Board's assessment is based on the financial and business performance of the Bank as a whole, combined with an assessment of qualitative and quantitative indicators related to principles and behaviours that foster prudent risk management and an assessment of the Bank's risk profile. The assessment of sustainability activities is included in the qualitative assessment process through which the initial bonus value may be modified. For senior management, the ESG criterion accounts for 10% of the assessment factors. Timely implementation of sustainability initiatives means that this component of the bonus is awarded. The assessment of the progress of the initiative is carried out by the head of the Sustainability Department.

The incentive systems for the Bank's Management Board members are approved at the Shareholder Meeting level, while for senior management – at the Supervisory Board level.

15.4.3 Due diligence

[GOV-4] In all its business operations, the Bank Millennium Group is guided by the principles set out in the *UN International Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises (OECD Guidelines)*. Related Group policies are available at: www.bankmillennium.pl/o-banku/esg#zasady-esg.

The Group is also guided by the regulations applicable to the banking sector, including the Act of 29 August 1997 entitled "Banking Law" and the recommendations issued by the Polish Financial Supervision Authority. Accordingly, due care is maintained in all processes, including with respect to sustainability issues.

Core element of due diligence

Disclosures in the statement

Embedding due diligence in governance, strategy and business model	GOV-1, GOV-2, GOV-3, SBM-3
Engaging with affected stakeholders in all key steps of the due diligence	GOV-2, SBM-2, IRO-1, MDR-P, S1-2, S4-2
Identifying and assessing adverse impacts	IRO-1, SBM-3
Taking actions to address those adverse impacts	MDR-A, E1-3, S1-4, S2-4, S4-4, G1-3
Tracking the effectiveness of these efforts and communicating	MDR-T, E1-4, S1-5, S2-5, S4-5

15.4.4 Sustainability reporting

[GOV-5] The principles related to the management and control of the ESG area at the level of the whole Bank Millennium Group are governed by the document entitled *ESG – Principles of Management and Control* adopted by the Management Board. Its main objective is to provide the Bank Millennium Group with a robust framework for the management and control of the ESG area (including the management and control of ESG risks) in full compliance with legal requirements, applicable internal regulations and best market practices. The document also describes, among others, the responsibility of the Sustainability Department for ESG reporting.

The Sustainability Department, as the unit responsible for the sustainability reporting process, is responsible for:

- Coordinating data collection activities from other competent areas,
- Ensuring that the report complies with regulatory requirements,
- Verifying the completeness and integrity of the data provided by respective units.

The sustainability reporting process is designed to be transparent and reliable. It includes the following stages:

- Defining the scope of the report,
- Collecting data,
- Verifying data,
- Preparing the final content of the sustainability reporting,
- External assurance,
- Approval by the Bank's competent authorities.

The preparation of sustainability reporting involves cooperation with various organisational units of the Bank Millennium Group. The participants in the process have had the opportunity to familiarise themselves with the reporting requirements in accordance with the European Sustainability Reporting Standards (ESRS) as part of the ongoing double materiality analysis process.

Identifying and managing sustainability reporting risks is an important part of responsible governance. As part of our responsible approach to managing these risks, we regularly identify and evaluate risks that may affect the completeness, reliability and compliance of our sustainability reporting with the applicable regulations.

The risks identified in this regard in the Bank Millennium Group are:

- Risk of data completeness and integrity – potential omission of material information or misrepresentation of data.
- Risk of accuracy of estimated results – potential deviations due to the calculation methodology and/or assumptions used in the estimated data.
- Value chain data availability risk – limited availability or lack of data from suppliers and/or other value chain partners.

- Timeliness risk – delays in the provision of key data that may affect the timeline for sustainability reporting preparation.
- Regulatory risk – non-compliance with the applicable laws or regulations.

The assessment of these risks is carried out by the Sustainability Department using an expert method of discussing the risks during regular department meetings, prioritising them and planning actions to address them. Due to the rapid development of sustainability reporting regulations as well as increasing data requirements, currently all listed risks are assessed as having equivalent weights. For this reason, we integrate the conclusions from the risk assessment and internal controls with regard to the sustainability reporting process into the relevant internal processes on an ongoing basis by adding appropriate provisions in the relevant policies and procedures applied to the Bank's operations.

To effectively manage these risks, we have implemented the following solutions:

- Control activities related to data verification at the source level, checking data consistency and compliance with regulations.
- Awareness building within the Bank on reporting obligations and responsibility for the completeness and accuracy of the reported data (meetings, workshops).
- Strengthening cooperation between the Sustainability Department and the Risk Department through joint initiatives, knowledge exchange, and coordination of activities to ensure consistent management of ESG reporting risks.
- Source documentation – all data presented in the report are appropriately documented, enabling their verification.
- Process automation – work is underway in the Bank Millennium Group to deploy a comprehensive ESG data management system in order to minimize the risk of errors.
- Subjecting sustainability reporting to an independent assurance service.

The process of preparing sustainability reporting described above has been discussed at the meetings of the Sustainability Committee and the Supervisory Board Audit Committee.

Legal requirements on sustainability reporting assurance

- The policy for selecting and cooperating with audit firms:

Bank Millennium S.A. has a policy on selecting an audit firm to provide assurance of sustainability reporting and for non-assurance services provided by that firm and its network. The policy was adopted in accordance with applicable laws and is applied in audit firm selection and cooperation processes.

- Information on the selection of an audit firm:

The audit firm to provide assurance of the Bank Millennium Group's sustainability reporting for financial year 2025 was selected by the Supervisory Board in accordance with applicable laws, including the Act on Auditors and the Finance Minister's Regulation of 6 June 2025³, following the selection procedure specified in the Bank's internal regulations.

- Confirmation of impartiality and independence:

The audit firm KPMG Sp. z o.o. and the assurance team members meet the conditions for preparing an impartial and independent assurance report in accordance with applicable laws, professional standards, and ethical principles.

- Assurance report:

The Bank Millennium S.A. Group's sustainability reporting was subject to independent assurance by KPMG Sp. z o.o. The assurance was conducted as a limited assurance review in accordance with applicable laws and the National Standard for Sustainability Reporting Assurance Services 3002PL. The scope of work included assessing compliance of the reports with European Sustainability Reporting Standards, Regulation (EU) 2020/852 (EU Taxonomy).

³ The Finance Minister's Regulation of 6 June 2025 on the Current and Periodic Information Transmitted by Securities Issuers and the Conditions for Recognizing the Information Required by the Regulations of a Non-Member State as Equivalent.

This information was prepared based on the Supervisory Board's statement of 6 February 2026.

15.5 Double materiality assessment

15.5.1 Description of the double materiality assessment process

[IRO-1] In accordance with the requirements of the Sustainability Reporting Standards, serving as the basis for determining the scope of the disclosures and the related application requirements has been a process for identifying the impacts, risks and opportunities, and assessing which of them are material. It took into account the principle of double materiality, that is both the environmental and social impacts of the Bank Millennium Group have been taken into account (impacts on the external environment, also referred to as impact materiality) and the impact of external factors: environmental, social and governance-related on the Bank Millennium Group (impact of the environment on the Bank Millennium Group, also referred to as financial materiality).

The Double Materiality Assessment (DMA) process was conducted in full as part of preparations for the first Sustainability Statement for financial year 2024. To ensure the ongoing relevance of the double materiality assessment results in the context of this Sustainability Statement for financial year 2025, an appropriate verification and update of the process was performed, encompassing a review and reassessment of the methodology and all impacts, risks, and opportunities.

[IRO-1] [BP-1] In both identifying and assessing materiality, we have taken into account the impacts arising from our own operations and business relationships in the value chain. The starting point of the process has been an understanding of the Group's own operations, business model, products, services and data management and a mapping of the whole value chain (upstream and downstream), as part of which we have identified the issues to be further analysed for materiality.

The Group's core business is banking and, as such, an crucial area of our value chain to be analysed has been the loan portfolio by business segment (retail and corporate), including in the context of financed sectors. For the identification of impacts, risks and opportunities, we have resorted to multiple sources of information, including reputable external sources, such as the UNEP FI Portfolio Impact Analysis Tool for Banks.

Given the financial/service business model of the Bank Millennium Group, the area of resource dependency primarily involves dependency on human resources as part of own operations, and dependency on human, social and natural resources upstream and downstream in the value chain.

The assessment of financial materiality has been performed from the perspective of addressees of the Bank Millennium Group's financial statements who make decisions (if need be) taking into account all available information, including in the area of sustainability. Accordingly, and any such information is omitted or distorted, this may affect the user's decision. This is the case for risks and opportunities causing or likely to cause significant financial impacts for the Group in the future.

The process of identifying and assessing impacts and risks under the DMA, and managing those risks, is coordinated with the Bank's risk management processes – the double materiality analysis is based on analyses and conclusions from the annual Climate and Environmental Materiality Assessment (C&E MA) conducted by the Risk Department. The ESG Risk Team within the Risk Department, which performs the C&E MA, provides input to the DMA and ensures consistency of conclusions in both these processes. The DMA risk and impact assessment also draws on additional analyses and expertise from the Risk Department in the ESG area.

Material Group stakeholders (identified through prior analyses) participated in the double materiality assessment process, appropriately engaged in identifying and assessing specific impacts, risks, and opportunities. Stakeholder engagement has been driven by a desire to understand how the Group affects the stakeholders. The main forms of engagement were surveys and workshops (with employees from units involved in sustainability reporting preparation). NGOs and research and scientific institutions speak on behalf of the environment. Among the reports taken into account have been the following: *Zero Emission Poland 2050 (2020) prepared by WWF* and *Reporting alone will not protect the climate. Decarbonising your business – climate competitiveness 2.0 (2024)* by the Climate Strategies Poland Foundation.

The analyses also take into account key business partners, which include franchisees, brokers, product and service providers. Franchisees, as an important distribution channel for banking services, constitute the group of business partners most significantly affected by the Group and are described in detail in

the section about employees in the value chain (in section 18. *Workers in the Group's value chain (ESRS S2)*).

From June to September 2025, surveys of internal and external stakeholders were conducted, in which they were asked to assess the importance of individual ESG topics included in the ESRS standard on a scale from 1 (totally immaterial) to 5 (highly material). The surveys were completed by employees, retail customers, and other key external stakeholders (including corporate customers and suppliers). The survey results are analysed in detail, and based on them, the Bank refines its approach to workforce management and plans future actions.

An update of the double materiality assessment process also included a review of all existing impacts, risks, and opportunities, new ones relevant to changes in the reporting year were added, and they were assessed by the Bank's experts in accordance with ESRS requirements.

The Sustainability Department was responsible for conducting double materiality analysis. The identified impacts, risks and opportunities as well as the proposals for their assessment have been subject to verification with internal documentation and confirmation with the responsible units, primarily the Risk Department and the Compliance Department. The outcomes of the double materiality analysis were submitted for approval to the Bank's Management Board and then presented to the Bank's Audit Committee.

To ensure appropriate knowledge of sustainability reporting requirements, training workshops have been held with management and staff involved in the double materiality analysis process, including representatives of Bank Millennium Group subsidiaries.

Engagement of Bank Millennium Group corporate bodies in dialogue with stakeholders

The opinions of the stakeholders we impact are analysed in depth and communicated at all levels of management in the Bank. The outcomes of customer needs surveys are discussed twice a month at the CX Forum – a meeting organised with selected Management Board Members and representatives of pertinent business units. The Bank conducts an anonymous employee satisfaction survey for Bank Millennium Group employees annually. The survey results are thoroughly analysed and used by the Bank to refine its governance approach in the workforce area and plan future actions.

Moreover, within the framework of communication with stakeholders and gathering stakeholder opinions, workshop meetings were organised with representatives of substantive areas. Sustainability issues are given special attention by the Sustainability Committee at its regular meetings. The extent of involvement of the Management Board, the Supervisory Board Audit Committee and the Sustainability Committee in the double materiality analysis process carried out in the preparation of this statement (including: communicating the views and interests of the Bank's affected stakeholders) is described in section 15.5.5 *Material sustainability-related impacts, risks and opportunities*.

15.5.2 Double materiality assessment methodology

Materiality of impact

[IRO-1] The identified impacts have been classified in terms of their nature as positive or negative, and in terms of their type as actual or potential. Then, based on the internally applied methodology for assessing the materiality of impacts, based on the European Sustainability Reporting Standards, we then assessed each identified impact against a set of qualitative criteria. The assessment has been of an expert nature and included components such as the scale of the impact and its scope, the likelihood for potential impacts, and the possibility of reversing or remedying negative impacts. A summary of the assessment components used is presented below:

Summary of impact assessment components

Type of impact	Scale	Scope	Irremediability	Likelihood
Negative actual	+	+	+	
Negative potential	+	+	+	+
Positive actual	+	+		
Positive potential	+	+		+

The assessment is based on a 5-point scale in which the maximum number of points corresponds to the greatest strength of impact. The criteria adopted for awarding the sub-assessments are based on the following assumptions:

- The **scale** for environmental impacts reflects the degree of exposure of the environment, people and organisms (from imperceptible to catastrophic/very positive), while for social and governance impacts, the degree of impact on human health or quality of life or internal governance was assessed.
- The **scope** of environmental impacts is linked to the size of the geographical area (global or local impact) and, for social and governance impacts, to the size of the affected population (number of social groups affected and percentage of the population within these groups).
- The **irremediability** of the negative impact, that is the impossibility of restoring the baseline given the necessary efforts, resources and time horizon.
- The **likelihood** of potential environmental, social and governance impacts.

For potential impacts, the assessment of their severity (the scale, scope and - for negative impacts - irremediability) was more important than the assessment of likelihood. This approach stems from the lower precision in determining the possible materialisation of a specific (often indirect) impact compared to determining its severity. The approach also applied to assessing potential negative human rights impacts, where – in line with ESRS guidelines – severity assessment takes precedence over likelihood.

In order to determine which impacts are material to the Bank Millennium Group's operations, based on the rating scale adopted, we have selected a cut-off point below which our impacts are considered to be immaterial. This threshold is expertly set so that the percentage of material impacts among all identified impacts would allow for transparency and relevance of disclosures to the audience.

The process of identifying, assessing, prioritising and monitoring the potential and actual impacts of the Bank Millennium Group on people and the environment has been carried out based on the due diligence process set out in the international instruments of the *UN Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises*.

Financial materiality

As part of the financial materiality assessment process, we have analysed the Bank Millennium Group's dependencies on natural, human and social resources, which may act both a source of financial risks or opportunities. The analysis has included:

- issues under our control (in line with the adopted consolidation), related to our own operations and arising mainly from the identified impacts and strategies of the Bank Millennium Group,
- issues arising from our business relationships.

The starting point of the assessment was the analysis of identified environmental and social impacts of the Bank Millennium Group, as well as the analysis of current business circumstances (among others, the newly adopted Strategy 2028) for links and dependencies with sustainability-related risks and opportunities.

The assessment of financial materiality includes a scale of financial impacts and probability (from 1 to 5, analogous to impacts), where the maximum number of points corresponds to the highest scale and the highest probability of occurrence. We based the sub-assessments of risks and opportunities in 2025 on qualitative criteria, due to the limited availability of quantitative criteria that might be applied. From a financial perspective, we have considered sustainability issues that cause, or may reasonably be expected to cause, significant financial impacts due to their effect on the Group's development, financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term. As with the impact assessment, in order to identify risks and opportunities that are material to the operations of the Bank Millennium Group, we have set a quantitative cut-off point below which we consider a risk or opportunity to be immaterial. The threshold has been determined in an expert manner with a view to maintaining transparency and relevance of disclosures to the audience.

An important role in the materiality assessment process has been played by the Risk Department, which is responsible for managing the traditional risks identified in the operations of the Bank Millennium Group, that is credit, concentration, market, liquidity, operational (including reputational) risks. In accordance with supervisory guidelines, environmental and social issues are taken into account as

factors affecting the level of traditional risk categories. Accordingly, the Risk Department has established a process for periodically assessing the materiality of the impact of environmental and climate risk factors and has developed a methodology for assessing the materiality of these risks. For material environmental and climate risks, Bank Millennium identifies transmission channels to traditional banking risks. Currently, the Bank considers detailed solutions for identifying, measuring, controlling, and reporting ESG risk appropriate for credit risk, liquidity risk, and business risk. The materiality assessment also includes sensitivity analysis using climate scenarios. In 2025, the Bank worked on using a more detailed scenario analysis in the climate risks area, including conducting climate stress tests.

The Bank Millennium Group also sees the positive business opportunities related to sustainability, primarily related to financing the transition to a low-carbon and climate-resilient economy, as reflected in the material opportunity identified for ESRS E1 and presented in section 16. *Climate change (ESRS E1)* of this statement.

15.5.3 Identifying and assessing impacts, risks and opportunities

[E1 IRO-1] The Bank identified and assessed climate-related impacts, risks, and opportunities using analyses performed by the Risk Department, including as part of the periodic materiality assessment of environmental and climate risk factors for traditional banking risks. The UNEP FI Portfolio Impact Analysis Tool was used for identifying and assessing impacts.

Climate change risks are identified and assessed as part of the periodic materiality assessment of environmental and climate risk factors for traditional risk categories in bank activities. The materiality analysis covers physical risk and transition risk factors, as well as sensitivity analysis using climate scenarios.

Physical risk

Climate physical risk arises from climate change and may be triggered by events (acute risk) or long-term changes in climate patterns (chronic risk). Acute physical risks arise from particular hazards, especially weather-related events such as storms, floods, fires or heatwaves. Chronic physical risks arise from long-term changes in the climate, such as temperature changes, and their impact on rising sea levels, reduced water availability, loss of biodiversity and changes in land and soil productivity.

Bearing in mind that the Group's financial activities are carried out in Poland, from the long list of physical risk factors defined in the EU Taxonomy (in Appendix A of the Delegated Climate Regulation, which defines the technical criteria for considering an activity as environmentally sustainable), we have selected the physical risk factors relevant to the geographical scope of our financial activities, based on the Intergovernmental Panel on Climate Change (IPCC) study, in the short, medium and long term. The factors relevant to the region in which we conduct our financial activities are:

- floods / inundations,
- droughts / water shortages,
- heat waves.

The exposure to physical risks reflects to the Bank's place of business and its loan portfolio, to the extent that it finances physical assets. Due to the nature of the Bank Millennium Group's business in the corporate banking area, which covers the whole country and a broad cross-section of economic activity sectors, the analysis of climate risk has been performed on a geographical basis for physical risk (at postal code level) and at PKD code level of the main activity of a corporate client.

In retail banking, physical risk analysis was conducted for properties used as collateral for mortgage loans, for risk factors in the form of floods and inundations. The assessment was performed at the level of the property's postal code.

Moreover, the following areas were analyzed in the context of physical risk: exposure of employees in high physical risk locations (operational risk), deposits of non-financial companies and deposits of retail customers (liquidity risk), and net interest income from non-financial companies as well as net fees and commission income from non-financial companies (business risk).

The quantitative assessment of physical risk was based on Klimada 2.0 maps, whose concept draws on IPCC framework. The physical risk maps for Poland provide assessments for climate scenarios RCP 4.5 and RCP 8.5 in various time horizons in 21st century, prepared for local administrative units at the NUTS 5 level.

These scenarios correspond to the following narratives:

- RCP 4.5: A scenario assuming relatively ambitious GHG emission reductions, with emissions initially rising slightly before declining around 2040. In spite of such relatively ambitious reduction measures, RCP 4.5 fails to achieve the goal of reducing temperature growth to 2°C or the 1.5°C aspiration, as agreed in the Paris Agreement.
- RCP 8.5: A high emissions scenario assuming no significant changes in the current emission reduction policies. It features growing GHG emissions leading to their high concentrations in the atmosphere. It is consistent with the current policy scenario.

Following the approach assumed in Klimada 2.0 maps, the following time horizons were used for physical risk:

1. Short-term: 2021-2030
2. Medium-term: 2031-2040
3. Long-term: 2041-2050

Based on the adopted physical risk assessment methodology and data for business locations, portfolios, and segments, exposure to physical risk was assessed not material. This applied also to the most extreme scenario and time horizon (RCP 8.5 for 2041-2050). Poland exhibits relatively low physical risk exposure, even assuming high GHG emissions and consequently higher materialisation of physical risks in the long term.

Transition risk

Transition risk arises from the shift towards a low-emission economy resilient to climate change. It encompasses policy and legal risk, technology risk, market risk, and reputational risk.

Two different methodologies were used for transition risk assessment (depending on the characteristics of the credit portfolio segment analyzed). For non-financial corporates, the assessment reflects potential costs for companies resulting from transition to a low-emission economy, including those arising from:

- energy shock (price pressure related to investments in green energy sources/infrastructure and volatility of energy market prices related to the transition),
- carbon shock (the impact of public policies on the prices of ETS emission allowances, causing increasing operational costs for greenhouse gas emitters),
- investment shock (additional capital expenditures required to achieve green transition goals).

The combined impact of these shocks on the respective sectors constitutes the basis for assessing transition risk (subject to expert adjustments).

For portfolios secured by real estate, transition risk is assessed based on buildings' energy efficiency. As energy performance classes are not yet directly defined in Polish legislation, the energy efficiency of buildings is determined based on their energy consumption (primary energy demand). The data on primary energy demand for properties is derived from energy performance certificates or, if not available for a given property, is subject to estimates.

Other portfolios analyzed in the context of transition risk include: the government bonds portfolio (credit risk), non-financial corporate exposure in the banking and trading books (market risk), non-financial corporate and retail deposits (liquidity risk), and net interest income from non-financial corporates, as well as net fees and commission income from non-financial corporates (business risk).

The analysis carried out considers the climate scenarios developed by The Network for Greening the Financial System (NGFS):

- The "Net Zero 2050" Scenario – assumes that global warming is limited to 1.5°C through the implementation of climate policies and innovations targeting net-zero CO₂ emissions around 2050. This includes immediate implementation of ambitious climate policies and carbon dioxide removal technologies to accelerate decarbonization, resulting in high transition risk. It is the most conservative transition scenario.
- The "Current Policies" Scenario – assumes that only currently implemented policies are preserved. In this scenario, the risk of physical effects of climate change is high, and the impact of GHG emissions reflects the more risky (high) range of current estimates.

- The “Delayed Transition” Scenario – in which climate change prevention action is delayed until 2030. To compensate for the late start, deeper adjustments are required. Governments, companies, and consumers change their conduct in response to these dramatic shifts, with asset prices undergoing sharp revaluation, leading to a severe macroeconomic shock. The climate target is met, limiting the rise in global average temperature to below 2°C. In this scenario, physical risks rise more than in the Net Zero 2050 scenario, and transition risks become severe from 2030.

The above transition risk scenarios refer to the following time horizons and their endpoints:

1. short-term – reporting period (1 year)
2. medium-term – up to 5 years – 2030
3. long-term – more than 5 years – 2040.

Based on the adopted transition risk assessment methodology and data for individual portfolios and segments, the level of exposure to transition risk was deemed material for:

- Credit risk (for the non-financial corporate loan portfolio, mortgage loan portfolio, and government bonds portfolio in the banking book);
- Liquidity risk (for retail customer deposits);
- Business risk (for net interest income and net fees and commission income from non-financial corporates).

These conclusions refer to the scenario that assumes rapid transition and a relatively short time horizon (the “Net Zero 2050” scenario, medium time horizon to 2030).

Translating these conclusions to the value chain context (downstream), the following transition risks were identified:

1. Risks to the corporate loan portfolio arising from the financing of customers in high-emission sectors and related to potential reduction targets for scope 3 of category 15. Potential emission reduction targets may require restricting the client base, especially from high-emission sectors, which may impact Bank’s profitability (business risk for net interest income and net fees and commission income from nonfinancial corporates).
2. Risks associated with the transition of corporate customers towards a low-carbon economy (credit risk for the non-financial corporate loan portfolio).
3. Transition risk for retail clients, related to the decline in property value, partial income loss, or job loss due to overall economic situation (credit risk for the mortgage loan portfolio and liquidity risk for retail deposits).

The identification and assessment of risk also took into account the results of greenhouse gas emissions calculations from our own operations (Scopes 1 and 2) and from our value chain (Scope 3), with particular emphasis on our credit portfolio and leasing activities.

Information on greenhouse gas emissions for all relevant scopes and categories is presented in section 16.3.3 *Targets related to climate change mitigation and adaptation* and section 16.3.5 *Gross scopes 1, 2, 3 and total GHG emissions*. Our analysis also included planned activities – both those that may become a source of new GHG emissions and those related to their reduction to pursue climate neutrality from all Group operations (Scopes 1-3) by 2050, in accordance with the *Transition Plan*. Potential future greenhouse gas emissions in the Bank Millennium Group will come from new financing.

In accordance with the *Responsible Financing Policy*, the Group has excluded sectors and activities related to oil extraction, hard coal mining, and coal-based power generation from new loans and investment transactions.

Climate-related changes may also open new business opportunities, especially in the context of developing a portfolio of financial assets that support the transition of the economy and sustainable development. In the double materiality analysis, we have identified a material climate change opportunity for our business.

The opportunity stems from the planned increase in the Group’s share in the market for sustainable financial products, which includes financing of customer assets and activities that support the transition to a low-emission economy. This aligns with the PLN 5 billion target for such financing set in *Strategy 2028*.

[E2 IRO-1] Actual and potential impacts, risks, and opportunities related to air, water, and soil pollution (excluding GHG emissions and waste), microplastics, and potentially hazardous substances, as well as dependencies on ecosystem services in Bank Millennium Group's own operations and upstream and downstream in the value chain, were identified using the UNEP FI Portfolio Impact Analysis Tool and SASB Materiality Finder. The significance of environmental issues, including the Group's pollution impact, was also examined as part of the update of the double materiality assessment process in the survey of internal and external stakeholders. The Bank conducted no further consultations on pollution, as no significant concentration of the Group's or value chain activities was identified in sectors identified by the above sources as materially impacting pollution. No local communities were identified that would be affected by such activities.

[E3 IRO-1] Actual and potential impacts, risks, and opportunities related to water and marine resources in Bank Millennium Group's own operations and upstream and downstream in the value chain, were identified using the UNEP FI Portfolio Impact Analysis Tool and SASB Materiality Finder. The significance of environmental issues, including the Group's impact on water and marine resources, was examined as part of the update of the double materiality assessment process in the survey of internal and external stakeholders. The Bank conducted no further consultations on water and marine resources, as no significant concentration of the Group's or value chain activities was identified in sectors identified by the above sources as materially impacting water and marine resources. No local communities were identified that would be affected by such activities.

[E4 IRO-1] Actual and potential impacts, risks, and opportunities related to biodiversity and ecosystems in Bank Millennium Group's own operations and upstream and downstream in the value chain, were identified using the UNEP FI Portfolio Impact Analysis Tool and SASB Materiality Finder. Direct impact drivers concerning biodiversity loss, species condition, as well as impact on the extent and condition of ecosystems were analyzed. The significance of environmental issues, including the Group's impact on biodiversity and ecosystems, was also examined as part of the update of the double materiality assessment process in the survey of internal and external stakeholders. The Bank conducted no further consultations on biodiversity and ecosystems, as no significant concentration of the Group's or value chain activities was identified in sectors identified by the above sources as materially impacting biodiversity and ecosystems. No local communities were identified that would be affected by such activities.

The Bank did not identify or assess dependencies on biodiversity and ecosystems or associated services in its own locations or upstream/downstream value chain, did not consider systemic risk, and did not conduct scenario analyses. The Bank believes that the scope and granularity of the analyses performed are appropriate to its activities across the entire value chain.

The Bank has no locations in biodiversity-sensitive areas or in their vicinity. No need was identified to implement any measures to mitigate biodiversity loss, such as those specified in:

- Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds,
- Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora,
- Environmental Impact Assessment (EIA) as defined in Article 1(2)(g) of Directive 2011/92/EU of the European Parliament and of the Council (76) on the assessment of the effects of certain public and private projects on the environment.

[E5 IRO-1] Actual and potential impacts, risks, and opportunities related to resource use (inputs and outputs) and circular economy (waste management, including hazardous and non-hazardous waste) in the Bank Millennium Group's own operations and upstream/downstream value chain were identified using the UNEP FI Portfolio Impact Analysis Tool and SASB Materiality Finder. The significance of environmental issues, including the Group's impact on resource use and circular economy, was also examined as part of the update of the double materiality assessment process in the survey of internal and external stakeholders. The Bank conducted no further consultations on resource use and circular economy, as no significant concentration of the Group's or value chain activities was identified in sectors identified by the above sources as materially impacting resource use and circular economy. No local communities were identified that would be affected by such activities.

[G1 IRO-1] The process of identifying material impacts, risks and opportunities in the area of corporate governance was conducted in accordance with the methodology adopted by the Bank and described in Section 15.5.2 Double materiality assessment methodology. The criteria used in the process took into account the specifics of the Bank's banking and leasing activities in Poland, including the laws and

regulations applicable to the Group, as well as the significant impacts, risks and opportunities previously identified by the Group or its parent company.

15.5.4 Results of the double materiality assessment update

[IRO-1, SBM-3] The double materiality assessment process was conducted for the first time in 2024. In 2025, we updated it by refining the methodology (adjusting impact assessment formulas and materiality thresholds) and reviewed and re-evaluated all impacts, risks, and opportunities.

The update of the double materiality assessment process resulted in the following changes:

- New material actual negative impact: The impact related to the financing of activities contributing to the creation of greenhouse gas emissions. The decision was made due to the high share of emission-intensive sectors in our corporate portfolio.
- New material ESRS E1 transition risk: Transition risk for retail clients (related to falling property values, partial income loss, or job loss due to broader economic situation). The decision was made based on the results of risk materiality analysis carried out in 2025 by the Risk Department (see ESRS E1 SBM-3 for details).
- New material opportunity under ESRS E1: Opportunity related to the offering of sustainable financial products to corporate and retail clients. The decision was driven by *Strategy 2028* adopted in 2025, which increased the sustainable financing target to PLN 5 billion.
- New material opportunity under ESRS S1: Opportunity related to strategic employee development. The decision was made as *Strategy 2028* emphasises professional growth of the Bank's employees.
- The negative potential impact under ESRS S1 was deemed immaterial: Impact related to potential exposure of branch employees to violent acts (due to handling of cash). The decision was made due to the low probability of materialisation, implemented branch security measures, employee safety training. Other banks in Poland have also identified lack of materiality of these impacts.
- The actual positive impact under ESRS S2 standard was deemed immaterial: Impact related to the commitment of suppliers to respect the ethical principles and working conditions applicable in the Bank Millennium Group. The decision was made due to the relatively limited influence of the Group, which obligates suppliers to familiarize themselves with the rules of conduct adopted by the Group. Unlike franchisees, suppliers rely on multiple business partners at the same time, rather than the Bank Millennium Group alone. Other banks in Poland have also identified lack of materiality of these impacts.

The results of the update were approved by the Bank's Management Board and presented to the Audit Committee of the Bank's Supervisory Board.

The double materiality analysis will be reviewed again if factors that may affect the activities, strategy or business model of the Bank Millennium Group are identified, or at least annually even if such factors or events do not arise.

15.5.5 Material sustainability-related impacts, risks and opportunities

[SBM-3] As part of the double materiality analysis on the basis of which the list of issues considered in this sustainability statement has been determined, we have examined the impacts, risks and opportunities in all areas of sustainability: environmental, social and governance, and we have evaluated them in terms of materiality across the Bank Millennium Group's value chain. The links between material impacts, risks and opportunities, and the strategy and business model were described in the topical chapters devoted to the respective material sustainability issues.

As a result of our analysis, we have identified the following material impacts, risks and opportunities within the sustainability themes covered by the ESRS.

Identified material impacts, risks and opportunities

IRO Type	Material impact, risk or opportunity - description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain			Time horizon		
ESRS E1 Climate change							
Climate change mitigation							
Negative actual impact	Financing activities contributing to GHG emissions						●
Risk	Risks to the corporate loan portfolio arising from the financing of customers in high-emission sectors and related to potential reduction targets for scope 3 of category 15			●		●	●
Risk	Risks associated with the transition of corporate customers towards a low-carbon economy			●		●	●
Risk	Transition risk for retail clients (related to the decline in property value, partial income loss, or job loss due to overall economic situation).			●		●	●
Opportunity	Opportunity related to the offering of sustainable financial products for corporate and retail clients.			●		●	●
ESRS S1 Own workforce							
Working conditions							
Positive actual impact	Impact resulting from measures in place to support employees' work-life balance		●		●		
Positive actual impact	Impact related to ensuring job security for employees through stable forms of employment, programmes dedicated to employees approaching retirement age and a broad range of fringe benefits		●		●		
Positive actual impact	Impact resulting from strictly defined working hours and overtime monitoring		●		●		
Positive actual impact	Impact related to measures taken to ensure adequate compensation		●		●		
Positive actual impact	Impact through ensuring freedom of association of employees and cooperation with trade unions		●		●		
Positive actual impact	Impact through establishing effective channels of communication with employees		●		●		
Positive actual impact	Impact related to ensuring a safe working environment		●		●		
Equal treatment and equal opportunities for all							
Positive actual impact	Impact related to the promotion of gender neutrality, including in the area of employee compensation		●		●		
Positive actual impact	Impact related to attention to the development of employees' skills, including through training		●		●		
Opportunity	Opportunity related to strategic employee development		●		●	●	●

IRO Type	Material impact, risk or opportunity - description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain			Time horizon		
Positive actual impact	Impact related to taking measures to prevent violence		●		●		
Positive actual impact	Impact related to the promotion of diversity		●		●		
Other work-related rights							
Positive actual impact	Impact related to the protection of privacy and personal data of the Group's own workforce		●		●		
ESRS S2 Workers in the value chain							
Working conditions							
Positive actual impact	Impact related to the commitment of franchisees to respect the ethical principles and working conditions applicable in the Bank Millennium Group.			●	●		
ESRS S4 Consumers and end-users							
Information-related impacts on consumers or end-users							
Positive actual impact	Impact resulting from taking numerous actions to ensure that customers have access to reliable information about the Bank's products and services across all sales channels		●		●		
Negative potential impact	Impact on retail customers due to under-information of customers		●		●	●	●
Risk	Risk related to possible changes in consumer protection regulations or their interpretation		●		●	●	●
Positive actual impact	Impact resulting from measures to ensure privacy and confidentiality and security of customer data as well as processes for handling data breaches and ensuring transparent information about data breaches		●		●		
Negative potential impact	Impact resulting from exposure to leaks of personal data and bank secrecy, including as a result of a cyber attack		●		●	●	●
Social inclusion of consumers or end-users							
Positive actual impact	Impact related to providing clear and understandable information about the Bank's products and services		●		●		
Positive actual impact	Impact related to ensuring inclusiveness of products and services		●		●		
ESRS G1 Business conduct							
Corporate culture							
Positive actual impact	Impact resulting from the principles of corporate culture implemented in our policies, procedures, rules and regulations, and embedded in all processes within the Group		●		●		

IRO Type	Material impact, risk or opportunity - description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain			Time horizon		
Whistleblower protection							
Positive actual impact	Impact related to the whistleblower protection procedures in place and the anonymous channel for reporting violations		●		●		
Corruption and bribery							
Positive actual impact	Impact related to anti-corruption measures taken	●	●		●		
Specific topic: Safety of deposited funds							
Positive actual impact	Impact resulting from cybersecurity measures taken		●		●		
Negative potential impact	Impact related to the security exposure of deposited funds due to cyber attacks		●		●	●	●
Risk	Risk of data leakage, loss of trust and financial losses due to cyber attacks		●		●	●	●

[SBM-3] In 2025, the Bank worked on scenario analysis as a tool for assessing the Bank's resilience to climate risks. The work focused on analyzing financial resilience within up to 5 years and included climate stress test in the credit risk area. In the context of resilience of the Group's business model and a longer time horizon, the analysis was based on qualitative criteria. Both dimensions of scenario analysis will be subject to further work and coordination with other risk management process in the Bank Group, including with the *Transition Plan* implementation and update process.

15.5.6 Bank's resilience to climate risks

The Bank's business model is based on financing corporate and retail customers through loans, advances or leasing products. Financing activity is primarily funded by customer deposits provided to Bank Millennium. Accordingly, the Bank recognizes that in order to understand the resilience of the Bank's business model to climate risk, it is critical to determine the impact of climate risk on the Bank's credit risk and liquidity risk profile.

This approach is consistent with conclusions from materiality assessment, of climate and environmental risks for traditional banking risks conducted in 2025, i.e. on credit, operational, market, liquidity, business and reputational risks.

Forward-looking business environment analysis

In line with supervisory guidelines on ESG risk management, in 2025 we conducted a forward-looking analysis of the business environment, in which PESTLE analysis was adopted. We identified and analyzed the key Political, Economic, Social, Technological, Legal and Environmental factors that will shape the Bank Group's market in the coming years. The analysis covered the general business environment of the Group, as well as those related to sectors and areas of the Group's exposures that are crucial from the *Transition Plan* perspective. The business environment analysis in the context of ESG factors is one of the elements of our ESG risk management framework and will be further developed and integrated with other risk management processes.

Building resilience of the Bank's business model to climate change is also the main objective of the *Transition Plan* prepared by the Bank, which is detailed in section 16.2 *Bank Millennium Group's transition plan for climate change mitigation*.

Scenario analysis

In 2025, the Bank worked on a more detailed climate scenario analysis, that included conducting climate stress test.

In 2025, the Bank developed the methodology and conducted climate stress test in the material area of credit risk. The resilience analysis covered individual years up to 2030 and was based on shortterm climate scenarios developed by the Network for Greening the Financial System (NGFS)⁴. Stress factors used in the process included PD values for individual sectors as well as macroeconomic variables; together with the Bank's balance sheet projections, they were used to estimate the cost of risk and the volume of nonperforming loans for different business segments and in different scenarios.

The results confirmed the Bank's resilience to climate risks in the credit risk area under the specified assumptions. The largest increase in the cost of risk was observed in the scenario of intensive materialisation of physical risks (Disasters & Policy Stagnation), starting in the corporate loan portfolio and, in the longer term, also in the retail and leasing portfolios. On the other hand, in transition risk scenarios the estimated impact on the cost of risk was negligible.

In the Bank's opinion its risk management system is adequate to mitigate the identified risks. It comprises, among others, policy to require collaterals and sectoral policy introducing exclusions and limitations on financing for certain sectors. At this stage, the Bank sees no grounds to create provisions for climate change-related risks. In the current situation, the Bank believes it is sufficient to manage ESG risks using methods that do not affect the financial statements.

15.5.7 Bank's resilience to other material risks and impacts, and its ability to take advantage of material sustainability opportunities

To ensure the Bank's resilience to other material risks and impacts, and to ensure its ability to take advantage of material sustainable development opportunities, the Bank has incorporated into its

⁴ The short-term NGFS scenarios used in the analysis covered transition risk (Highway to Paris, Sudden Wake-Up Call), a combination of transition and physical risks (Diverging Realities), and physical risk (Disasters & Policy Stagnation).

strategy and business model actions focused on early identification and mitigation of potential negative impacts and risks, and on ensuring compliance with regulations. Details of the measures building our resilience are described in the sections below:

- 16.3.2. *Actions and resources in relation to climate change policies*
- 17.8. *Training and development*
- 19.4 *Safety of deposited funds*
- 19.5 *Privacy*
- 19.6 *Access to (high-quality) information*

15.5.8 List of requirements

[IRO-2] For a list of disclosure requirements fulfilled in the preparation of the sustainability statement following a materiality assessment, see section 22. *Appendices*.

A list of the data points contained in the cross-cutting standards and thematic standards that derive from other EU legislation is presented in section 22. *Appendices*.

The starting point for determining the scope of information disclosed within the sustainability statement is the assessment of impact materiality and financial materiality. Sustainability issues are considered “material” if they meet the double materiality principle, that is the criteria defined for either impact materiality or financial materiality, or both. Irrespective of the outcome of the materiality assessment, the scope of the statement also includes all the information and data points required under *ESRS 2 General disclosures* and as set out in the thematic ESRs related to the disclosure requirement IRO-1 *Description of the process to identify and assess material impacts, risks and opportunities* (including in their data points).

For the purpose of determining which detailed data points require disclosure, the Sustainability Reporting Standards and EFRAG *Implementation Guidance 3: Detailed ESRS Datapoints* have been relied upon.

16. Climate change (ESRS E1)

Climate change is one of the most serious challenges facing the modern world. It is increasingly evident that human activity – particularly the intensive use of fossil fuels – is driving high greenhouse gas (GHG) emissions and climate instability, resulting in more frequent extreme weather events.

The financial sector plays a key role in mitigating these risks and supporting the transition to a net-zero economy. At Bank Millennium, we take this responsibility seriously. We want to actively support the transition by analysing the climate impact of our activities – particularly our loan portfolio – and developing products that promote sustainable development.

16.1 Material impacts, risks and opportunities related to climate change

[E1 SBM-3] Based on the double materiality assessment, the Bank identified the “Climate change mitigation” sub-topic as material in respect of the following impacts, risks and opportunities:

IRO type	Material impact, risk or opportunity - description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain			Time horizon		
ESRS E1 Climate change							
Climate change mitigation							
Negative actual impact	Financing activities contributing to GHG emissions			●			●
Risk	Risks to the corporate loan portfolio arising from the financing of clients in high-emission sectors and related to potential reduction targets for scope 3 of category 15			●		●	●
Risk	Risks associated with the transition of corporate clients towards a low-carbon economy			●		●	●
Risk	Transition risk for retail clients (related to the decline in property value, partial income loss, or job loss due to overall economic situation).			●		●	●
Opportunity	Opportunity related to the offering of sustainable financial products for corporate and retail clients.			●		●	●

16.2 Bank Millennium Group's transition plan for climate change mitigation

[E1-1] The *Bank Millennium Group's Transition Plan (Transition Plan, Plan)* was adopted by the Bank's Management Board on 28th January 2026 and then approved by the Supervisory Board on 6th February 2026. The overarching objective of the Plan is to monitor and manage financial risks arising from ESG factors identified as material, in accordance with the *EBA Guidelines on the management of environmental, social and governance (ESG) risks*.

Work on the *Transition Plan* was conducted in the second half of 2025 and was based on data related to the respective lending and leasing portfolios as at 31.12.2024 and on the emissions of these portfolios for the base year 2024. For scope 1 and 2 emissions, the base year is 2020.

The *Transition Plan* takes into account the environmental commitments set out in the *Bank Millennium and Group's Strategy for 2025-2028 "Strategy 2028 – Value and Growth" (Strategy 2028)*, including:

- Moving towards carbon neutrality in scope 1 and 2 by 2030 and Net zero, including scope 3, by 2050,
- Providing PLN 5 billion in sustainable financing to corporate and retail clients (in the years 2025-2028).

The *Transition Plan* was developed based on the Group's adopted financial projections, consistent with the Strategy's assumptions. The commitments and actions outlined in the *Plan* are reflected in the budgets of the units responsible for implementing the individual elements of the *Plan*.

The *Transition Plan* takes into account the exclusions and limitations set out in the *Responsible Financing Policy* (described in section E1-2), in particular the exclusion of coal-based energy production as well as oil extraction and hard coal mining from new financing.

The *Bank Millennium Group's Transition Plan* covers own emissions (scope 1 and 2) and a part of the financed emissions (scope 3.15 and 3.13) resulting from lending to sectors and portfolios identified as materially exposed to climate risk during the Group's climate and environmental materiality assessment or having a significant share in the Group's balance sheet exposure and/or greenhouse gas emissions.

As part of the work on the *Plan*, the priority segments were identified, for which a set of actions was adopted in the first place and, where justified, quantitative commitments were made:

- Residential real estate retail portfolio. This portfolio represents more than half of the Group's credit exposure, is exposed to significant transition risk and consists of long-term receivables. For this portfolio, both quantitative commitments and a set of transition-supporting actions (including decarbonization) were adopted, relevant from the perspective of climate risk management.
- Transport portfolio (defined as leasing of passenger cars and heavy-duty trucks, as well as banking products for the road freight transport sector (PKD 49.41)). It constitutes a significant part of the Bank Millennium Group's portfolio and is exposed to significant transition risk. In this segment, we identified actions that support transition (including decarbonization) important from the perspective of climate risk management.
- Commercial real estate loan portfolio. The portfolio is exposed to high transition risk, especially related to existing and planned legal requirements in the area of energy efficiency. For this portfolio, we identified actions that support transition (including decarbonization) important from the perspective of climate risk management.
- Corporate loan portfolio financing electricity generation. This sector plays a key role in reducing carbon footprint of the entire economy. In relation to the Bank's readiness to support the transition of this sector, the Bank set both a quantitative commitment and a set of activities that support the transition (including decarbonization) relevant from the perspective of climate risk management.

In other sectors assessed as significantly exposed to climate risk or with a significant share of portfolio or emissions, the *Transition Plan's* actions are based on active dialogue and collaboration with clients to support them in their gradual transition to more sustainable business models. At this stage, this approach is considered sufficient from the perspective of prioritizing activities in the transition planning process and no quantitative commitments were made.

Segments selected for the *Transition Plan*

Portfolio/Segment	% of loan portfolio by gross exposure as at 31.12.2024
Residential real estate retail portfolio	50.6%
Transport portfolio	4.8%
Commercial real estate loan portfolio	2.3%
Corporate loan portfolio financing electricity generation	0.2%
Other sectors covered by the <i>Plan</i>: manufacture of chemicals and chemical products, manufacture of rubber and plastic products, manufacture of basic metals, manufacture of motor vehicles, trailers and semi-trailers, wholesale trade, and retail trade (except of motor vehicles and motorcycles).	6.8%

16.2.1 Commitments made in the *Transition Plan*

The *Transition Plan* covers the following greenhouse gas emission commitments:

Table. Greenhouse gas emission commitments in the medium term (2030)

Emission source / Portfolio	Scope of greenhouse gas emissions of the Group	Emissions in the base year	Emission intensity in the base year	Commitment for 2030	Reference pathway
GHG emission intensity commitments					
Scope 3.15 ⁵	Residential real estate	365 226 tCO ₂ e in 2024	55.1 kgCO ₂ e/m ² in 2024	28.3 kgCO ₂ e/m ²	Carbon Risk Real Estate Monitor 1.5°C for Poland ⁶
Scope 3.15 ⁷	Electricity generation	818.6 tCO ₂ in 2024	17.4 gCO ₂ /kWh in 2024	Maximum ⁸ : 195.0 gCO ₂ /kWh	International Energy Agency (IEA) Net Zero Emissions by 2050 ⁹ for the electricity generation sector
GHG emission reduction target					
Scope 1&2	Own operations	26 777.0 tCO ₂ e in 2020	-	2 677.7 tCO ₂ e	-

The commitments for the residential real estate retail portfolio and corporate loan portfolio financing electricity generation, as well as the actions described in the *Transition Plan*, were determined taking into account the Group's financial projections and commitments resulting from *the Strategy 2028 – Value and Growth*, in particular the projected level of sustainable financing. This approach allowed to ensure consistency with the business model and risk appetite.

16.2.2 Financed emissions

The financed emissions include categories 3.15 and 3.13 of the Bank Millennium Group's GHG emissions. For scope 3.15, the *Plan* refers to the following asset classes: residential real estate retail portfolio, commercial real estate loan portfolio, and other corporate loans in the sectors covered by the *Plan*. In the transport segment, the *Plan* covers scope 3.15 for the road freight transport sector (PKD 49.41) and emissions related to means of transport in category 3.13.

Residential real estate

The portfolio of loans financing residential real estate accounts for more than half of the loan portfolio by gross exposure as at 31.12.2024 and at the same time is significantly exposed to transition risk related to the energy efficiency of the financed properties. For this portfolio, both a commitment to reduce GHG emission intensity and a set of actions supporting the transition (including decarbonization) relevant from the perspective of climate risk management were established.

⁵ Covering scope 1&2 emissions of financed residential real estate.

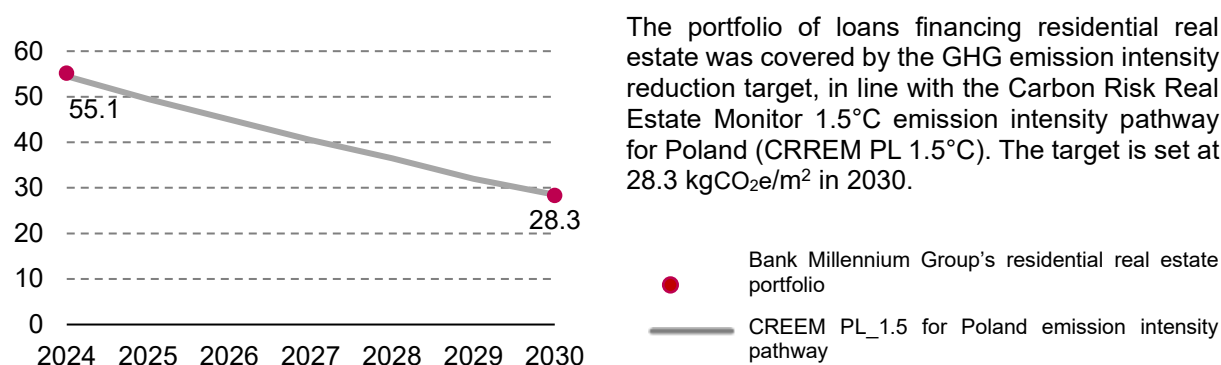
⁶ The value of 28.3 kgCO₂e/m² adopted as the Group's commitment was determined on the basis of an internal model using the arithmetic mean of the values for the 1.5°C CRREM v2.04 reference pathways for single-family and multi-family residential real estate, including all greenhouse gases (All GHG).

⁷ Covering Clients' scope 1 emissions in the sector.

⁸ The emission intensity must not exceed the limit of 195.0 gCO₂/kWh, corresponding to the 2030 reference value in line with the IEA NZE 2050 pathway for the electricity generation sector.

⁹ The reference pathway of International Energy Agency (IEA) Net Zero Emissions by 2050 assumes limiting global warming to 1.5°C compared to the pre-industrial levels, in line with the Paris Agreement.

Projected emission intensity of residential real estate portfolio - 2030 [kgCO₂e/m²]



To achieve the commitment on emission intensity, the Group defined a set of actions, including both initiatives already implemented and those planned for the coming years:

- Further financing of buildings with low energy demand through dedicated products,
- Monitoring the energy efficiency of financed properties, including an analysis of the structure of new sales and the entire portfolio, which allows for appropriate adjustment of management activities,
- Market monitoring and analysis of the possibility of expanding the product offer with solutions supporting thermal modernization of buildings,
- Initiatives to improve data quality, related to the introduction of an automated process for obtaining energy performance certificates, which allows for faster and more effective collection of information on the energy efficiency of real estate,
- Educating clients on the challenges related to the rising costs of energy consumption in households, as well as informing about available programmes supporting energy modernization, both at national and EU level.

Achieving our goal of reducing GHG emission intensity by 2030 depends to a large extent on factors beyond the Group's direct control, related to the implementation of national policies and the implementation of European Union regulations at the local level. The projected decrease in emission intensity assumes timely implementation of these policies and regulations. Any delays, changes or lack of implementation may jeopardize the Group's ability to meet its emission reduction commitment.

An additional challenge is related to the market demand for mortgage loans, as well as the supply of energy-efficient buildings.

In terms of achieving the adopted goal, continued financing of low-energy properties through dedicated products will be the main decarbonization lever on the Bank side. Moreover, as regards to activities beyond the Bank's control, the key lever is the effective implementation of European Union regulations at the local level, including the pace of implementation of the *National Energy and Climate Plan*.

Transport portfolio

The transport portfolio includes leasing portfolio of passenger cars and heavy-duty trucks, as well as banking products for the road freight transport sector (PKD 49.41). *The Transition Plan* focuses primarily on the leasing portfolio, which is the main form of financing clients in this sector. In the course of the analysis, two main focus areas were identified: a light passenger transport and a heavy-freight transport. For these areas, a set of actions supporting the transition (including decarbonization) was developed, relevant from the perspective of climate risk management. At this stage, no GHG emission intensity reduction targets were established for the transport sector due to the lack of science-based reference pathways consistent with the national plans. The Bank considers IEA NZE 2050 Scenario pathway for passenger cars and trucks as not reflecting the local specifics of transport sector in Poland.

Key activities in the transport sector, including both initiatives already implemented and those planned for the coming years, are:

- Gradually increasing the volume of electric cars financing. The Group offers preferential leasing terms for electric vehicles and charging stations,
- Monitoring market development and identifying business opportunities in the area of financing vehicles powered by low-emission alternative fuels, which will allow for the development of the offer aligned with the direction of the transport sector transition,
- Monitoring the emission intensity of vehicles in the leasing portfolio and the distance to the International Energy Agency Net Zero Emission by 2050 reference pathway,
- Participation in industry initiatives aimed at creating a market standard in the approach to emissions accounting and supporting the transition of the transport sector,
- Publication of educational materials for customers on the benefits of fleet transformation.

The Group also expects that the increase in sales volumes in the transport sector will contribute to a reduction in emission intensity due to the expected improvements in fuel efficiency of new vehicles.

Commercial real estate

The Bank Millennium Group's portfolio of commercial real estate includes both properties under structured finance arrangements (in particular office buildings and distribution warehouses) as well as standard financing of various types of commercial real estate, including industrial facilities. For this portfolio, a set of actions was developed to support the transition (including decarbonization) important from the perspective of climate risk management. At this stage, no GHG intensity reduction targets were set for this portfolio, given the high historical volatility of the portfolio composed of a limited number of high-value items.

The key activities related to the commercial real estate loan portfolio, including both initiatives already implemented and those planned for the coming years, are:

- Certification of commercial buildings financed by the Group¹⁰, which translates into higher quality and value of these buildings,
- Systematic collection of energy performance certificates,
- Monitoring the emission intensity of financed commercial real estate and the distance to reference pathways, including the International Energy Agency Net Zero Emission by 2050 reference pathway,
- Monitoring changes in national and EU regulations regarding technical requirements for real estate and the use of renewable energy technologies. Tracking national strategies, such as the National Building Renovation Plan, and the status of the transposition of the Energy Performance of Buildings Directive (EPBD) into national legislation,
- Conducting educational activities on financing opportunities for solutions that support sustainable projects, including in the construction sector, as well as providing information on options for supporting such investments with public funds, including those from the European Union.

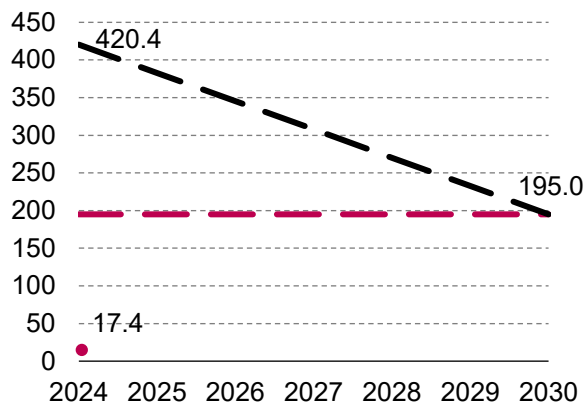
The Group also expects that new sales in the commercial real estate loan portfolio will contribute to reduction in the emission intensity of the portfolio, which is related to the current and upcoming legal requirements regarding the energy efficiency of buildings (*National Building Renovation Plan*) and the growing use of renewable energy sources technology in buildings.

¹⁰ The standard adopted by the Bank for new buildings under structured finance arrangements assumes that the financed buildings have environmental certificates, such as BREEAM, LEED, DGNB, EDGE or PassivHaus, at the levels specified by the Bank.

Electricity generation sector (PKD 35.11)

In the base year adopted for the *Plan* (2024), Bank Millennium Group's financing provided for entities from the power generation sector (which plays key role in reducing carbon footprint of the entire economy) consisted almost entirely of financing renewable energy sources (97.6% of gross exposures in the sector as at 31.12.2024). As a result, the sector's portfolio emission intensity was well below the reference pathway.

Emission intensity of the electricity generation sector in 2024 and maximum projected emission intensity by 2030 [gCO₂/kWh]



- Intensity of the Bank's portfolio, 2024
- Maximum assumed emission intensity value (cap)
- International Energy Agency Net Zero by 2050 pathway for the electricity generation sector

In light of the decarbonization challenges of the Poland's electricity generation sector, the Bank is ready to support the sector's transition, including by financing solutions that use transitional fuels. As a result, the emission intensity of this portfolio may temporarily increase. However, under the *Transition Plan* it has been established that this intensity will not exceed 195.0 gCO₂/kWh, which corresponds to the 2030 emission intensity value indicated in the International Energy Agency Net Zero by 2050 reference pathway for the electricity generation sector.

In addition to this quantitative commitment, a set of actions supporting the transition (including decarbonization) was planned, relevant from the perspective of climate risk management. The Group defined the following set of activities, including the initiatives already implemented and those planned for the coming years:

- Prioritizing the financing of electricity generation projects based on renewable sources, such as wind, solar, hydro and biogas,
- Maintaining the policy of not granting new loans for coal mining and coal-based energy production, as an important measure supporting the transition towards a low-carbon economy,
- Supporting projects in the modernization and development of transmission and distribution infrastructure, the development of smart grid solutions and energy storage systems, which are essential for the stability of the power system and the efficient use of energy from renewable sources,
- Supporting transitional projects aimed at improving energy efficiency as well as reducing energy consumption and GHG emissions, including financing gas-fired units as a transitional solution on the path toward a low-carbon economy.

Other sectors covered by the Plan

Based on the results of C&E materiality assessment for the Group's financial risks, as well as due to the significant share in the Group's balance sheet exposure and/or share in the Group's greenhouse gas emissions, *Transition Plan* also covers additional sectors:

- Manufacture of chemicals and chemical products (PKD 20),
- Manufacture of rubber and plastic products (PKD 22),
- Production of basic metals (PKD 24),
- Manufacture of motor vehicles, trailers and semi-trailers (PKD 29),
- Wholesale trade, excluding motor vehicles and motorcycles (PKD 46),
- Retail trade, excluding motor vehicles and motorcycles (PKD 47).

Selected clients from these sectors will be covered by a variety of activities to support their transition towards a sustainable economy through dialogue, awareness building and offering sustainable financial products. At the same time, these efforts will help develop a better understanding of clients' risk profiles and ensure that the Bank's engagement remains aligned with its risk appetite. We also view this process as a business opportunity, enabling us to identify financing needs for projects arising from clients' transition plans and the targets they have set.

16.2.3 Products and services related to sustainable development and transition

In accordance with *the Strategy 2028* in the short and medium term (by 2028), the Group plans to allocate PLN 5 billion financing to projects related to sustainability. Identifying client's needs for products and services related to sustainable development and transition will constitute a part of the engagement strategy under the *Transition Plan*. Depending on the identified needs, the financing will be provided to both green projects and other transition initiatives.

For a detailed description of the activities, tools and products related to sustainable finance for retail and corporate clients, see section 16.3.2 *Actions and resources in relation to climate policy*.

16.2.4 Own emissions

As part of *the Strategy 2028*, the Group declared its ambition to achieve climate neutrality in scope 1 and 2 by 2030 and its intention to continue the efforts to reduce emissions, with the possibility of using offsetting for residual emissions.

By 2024, a 70.7% reduction of scope 1 and 2 greenhouse gas emissions was achieved, compared with the base year (2020). Further actions will focus primarily on reducing emissions related to the Bank's branch network, which is the main source of remaining GHG emissions.

The achievement of the 2030 emission reduction target depends on several factors outside of the Group's direct control:

- Decarbonization of district heating systems, depending on the pace of the national energy system transitioning,
- Development of the market for guarantees of origin for heat, which depends on national regulations and market infrastructure.

The emissions reduction target adopted by the Group for its own operations is more ambitious than the reference pathway in scenarios aimed at limiting global warming to 1.5 °C in line with the Paris Agreement.

16.2.5 Locked-in emissions

As part of preparing the *Transition Plan*, the Group conducted an analysis of so-called locked-in greenhouse gas emissions for the Group's key assets. The key conclusions from this analysis are as follows:

- With respect to the mortgage loan portfolio – although the Group has limited influence over the pace at which the energy efficiency of the national building stock improves, the *Transition Plan* assumes a gradual enhancement of the energy performance of the national housing stock. Therefore, we decided not to report locked-in emissions from this portfolio.
- For emissions arising from general corporate-purpose loans, it was calculated that locked-in emissions account for 1.4% of total emissions for this financing category as at 31 December 2024 (as a result of the analysis conducted for exposures exceeding PLN 15 million, locked-in emissions were identified for five contracts with maturities in 2030 or later).
- For emissions arising from granted leasing contracts, it was calculated that locked-in emissions account for 3.1% of total emissions for this financing category as at 31 December 2024 (as a result of the analysis conducted for all leased assets, locked-in emissions were identified for 712 contracts with maturities in 2030 or later).
- With respect to properties used in our operational activities, we do not identify any locked-in greenhouse gas emissions.

In our assessment, the low level of estimated locked in emissions does not jeopardize the achievement of the commitments set out in the *Transition Plan*.

16.2.6 Other disclosures

Bank Millennium Group is not excluded from the EU Paris-aligned benchmarks.

We expect that the implementation of the commitments adopted in the Plan, including those related to the financing of climate change mitigation projects (e.g. financing of low energy demand real estate and renewable energy solutions), will contribute to a gradual increase in the share of EU-taxonomy aligned financing, which will translate into an increase in GAR, calculated in accordance with the applicable requirements of Commission Delegated Regulation (EU) 2021/2178.

16.3 Management of impacts, risks and opportunities

16.3.1 Policies related to climate change mitigation and adaptation

[E1-2, MDR-P] Environmental issues, along with social and governance factors, play an important role in the management of the Bank Millennium Group and form a significant part of our strategic activities and organisational culture.

Bank and Bank Millennium Group Strategy

The objectives in the Environment area are defined in the *Bank Millennium and Group's Strategy for 2025-2028 "Strategy 2028 – Value and Growth" (Strategy 2028)*. They are related to the Group's efforts to achieve net zero emissions by 2050 and to support customer transition and development through sustainable financing. To achieve these goals, the Group has developed a set of actions described in the Strategy, as well as internally monitored component initiatives leading to their implementation.

The *Strategy 2028* is publicly available on the Bank's website and communicated internally to employees over the intranet and during training sessions.

The correct implementation of the policies is monitored by Members of the Bank Millennium Management Board in accordance with their allocated powers. The Sustainability Department is responsible for monitoring the implementation of strategic ESG initiatives.

Sustainability policies

Bank Millennium has laid down the fundamental sustainability principles at the level of the whole Bank Millennium Group in the climate change mitigation and adaptation policies adopted by the Bank's Management Board. The policies are publicly available documents published on Bank Millennium's website and on the corporate site for employees and include regulations such as:

- *Policy on Sustainability Principles*
- *Environmental Policy*
- *Responsible Financing Policy*
- *Policy for preventing greenwashing*
- *Principles of Responsible Purchasing*
- *Supplier Sustainability Guidelines*

Additionally, sustainability principles have also been specified in the internal document entitled *ESG – management and control principles*.

Responsibility for the implementation of the commitments resulting from the above policies is allocated in accordance with the allocation of the responsibilities of individual organisational cells and their managers. The correct implementation of the policies is monitored by Members of the Bank Millennium Management Board in accordance with their allocated powers.

Issues related to climate change mitigation and adaptation are also taken into account of in *Strategy 2028*.

Policy on Sustainability Principles

The policy refers to, among others, issues related to climate change mitigation and adaptation. In accordance with its assumptions, promoting measures for climate change mitigation and adaptation is an integral part of a responsible business model of the Bank Millennium Group.

In the *Policy on Sustainability Principles*, we have committed ourselves to:

- include environmental risks (physical risk and transition risk) and social risks to the risk assessment process,
- define a list of sectors and business activities not financed by the Bank Millennium Group,
- create sustainable solutions – financing environmentally-friendly and energy-saving projects,
- stimulate sustainable growth and achievement of environmental goals,
- take measures aimed to reduce our own carbon footprint,
- develop sustainability-related competences,
- promote a responsible consumption culture.

The *Policy* is made available to the Group's employees on the intranet site and to customers and external entities on Bank Millennium's website.

The Bank's Management Board is responsible for developing and approving the *Policy on Sustainability Principles* and for ensuring compliance with it. The Sustainability Department, which reports directly to the President of the Management Board, is responsible for supervising and coordinating the implementation of the principles set out in the Policy in the Bank Millennium Group. Risk Departments in Bank Millennium Group entities are responsible for integrating ESG risks into the risk management process. Departments responsible for development of banking products are responsible for incorporating sustainability issues into Bank Millennium Group products, particularly by creating and promoting products that finance sustainable activities.

Environmental Policy

In accordance with the adopted *Environmental Policy*, the Group undertakes to be responsible for environmental protection, management and monitoring of adverse impact, both direct and indirect, of its own activity, products and services, by adding, among other issues, those related to climate change mitigation and adaptation.

The *Environmental Policy* sets forth the fundamental principles of the Group's own pro-ecological measures, development of pro-ecological products, responsible financing, and commitments to provide ecological education – including promotion of the culture of environmental responsibility and counteracting climate change. In our activities, we rely on practices and guidelines set out by global standards and external initiatives, such as the Paris Agreement on Climate Change, UN Sustainable Development Goals, 10 Principles of the United Nations Global Compact, as well as through participation in working groups and/or discussions on sustainability issues.

This policy is available to Group employees on the intranet site, and to customers and external entities on the Bank Millennium website.

The Sustainability Department, which reports directly to the President of the Management Board, is responsible for supervising the implementation of the principles set out in this Policy in the Bank Millennium Group.

Responsible Financing Policy

The *Responsible Financing Policy* refers to offering by the Bank Millennium Group sustainable financial products and conducting a responsible credit policy.

The document defines both exclusions and limitations in view of the assumed obligations regarding promotion of sustainability and counteracting climate change, which the Group takes into consideration

when making a decision to grant financing or engage in a project or an investment transaction on its own account.

This policy is available to Group employees on the intranet site, and to customers and external entities on the Bank Millennium website.

The Sustainability Department, which reports directly to the President of the Management Board, is responsible for supervising the implementation of the principles set out in this *Policy* in the Bank Millennium Group.

Principles of Responsible Purchasing

The purpose of the *Principles of Responsible Purchasing* is to ensure that Bank Millennium's procurement process incorporates sustainability criteria, including environmental aspects.

In accordance with this policy, supplier selection takes into account, among others, their sustainable practices and their contribution to the reduction of greenhouse gas emissions and promoting the principles of circular economy.

The policy was approved by the Bank's Management Board and applies to all companies in the Bank Millennium Group. It is available to Group employees on the intranet site, and to customers and external entities on the Bank Millennium website.

Furthermore, in line with the *Supplier Sustainability Guidelines* approved by a Member of the Bank's Management Board, the Bank Millennium Group encourages its business partners (upstream value chain), among others to take responsibility for the natural environment, adopt innovative and clean technologies, and reduce consumption of natural resources.

Policy for preventing greenwashing

The *Policy for preventing greenwashing* addresses the accuracy and transparency of Bank Millennium's communications on sustainability and products and services labelled as sustainable. The document sets out the principles and mechanisms to prevent misleading customers, investors and other stakeholders regarding the pro-environmental character of the Bank's products, services and activities. The Policy is available to Group employees on the intranet site.

The Sustainability Department, which reports directly to the President of the Management Board, is responsible for supervising the implementation of the principles set out in this *Policy* in the Bank Millennium Group.

ESG – management and control principles

The document entitled *ESG – management and control principles* provides the Bank Millennium Group with a robust framework for the management and control of the ESG area (including the management and control of ESG risks) in full compliance with legal and regulatory requirements, applicable internal regulations and best market practices. By taking an integrated view of managing the impact of ESG factors on financial risks, the ESG risk management and control framework adopted contributes to supporting the Bank's sustainable growth and value creation over the long term.

As part of ESG risk management, the following reports and analyses are prepared on a regular basis:

- forward-looking business environment analysis (Business Environment Analysis Report – BEAR),
- assessment of the materiality of climate and environmental factors (Climate & Environmental – C&E),
- monitoring of ESG metrics,
- review of ESG risk assessment for sector-specific approaches and policies.

The document is available to Group employees on the intranet site.

16.3.2 Actions and resources in relation to the climate policy

[E1-3, MDR-A] Climate change issues are an important element of the business approach of the Bank Millennium Group. *Strategy 2028*, adopted and published in 2024, is the foundation for further development of climate mitigation and environmental impact management actions. One of the actions planned in the document is to develop a comprehensive *Transition Plan* defining the Group's strategic approach to managing the risk of transition to a low-emission economy, including decarbonisation measures.

The *Transition Plan*, prepared in 2025, addresses detailed directions for reducing emissions associated with the financing, and in own operations. The targets and actions specified in the *Transition Plan* take into account the impacts, risks and opportunities identified in the IRO analysis. The document was formally adopted at the beginning of 2026. More information on the *Transition Plan* is provided in section 16.2. *Bank Millennium Group's transition plan for climate change mitigation*.

Climate mitigation actions – financing

As a financial institution, we play a key role in the transition towards the low emissions economy. Our actions focus on mitigating risks identified in the double materiality assessment and capitalising on opportunities related to the development of sustainable products. We support customers in transitioning to more sustainable business models, develop green project financing offerings and implement solutions that will allow us to reduce emission intensity reduction in the loan portfolio.

Actions for portfolios and sectors covered by the *Transition Plan* – including the RRE portfolio, transport sector, CRE portfolio, electricity production sector and other areas covered by the engagement strategy – are described in section 16.2 *Bank Millennium Group's transition plan for climate change mitigation*. Meanwhile, in 2025 we implemented a number of actions aligned with the strategic direction and supporting customers in implementing investments that help protect the environment.

The table below presents the identified material impacts, risks and opportunities and the corresponding actions implemented by the Bank Millennium Group in 2025.

Material impact	Risk or opportunity for climate change mitigation	Measure
Financing of activities that generate greenhouse gases	Risk associated with the corporate loan portfolio arising from the financing of customers in high-emission sectors and related to potential emission reduction targets for scope 3 and category 15.	Provision of sustainable finance to corporate customers in the total amount of PLN 1,356.4 million and PLN 582.1 million in 2025 and 2024, respectively. Development of the <i>Transition Plan</i> for climate change mitigation.
	Risks associated with the transition of corporate customers towards a low-carbon economy	Bank's actions related to C&E risk management, in accordance with the adopted regulations on risk management and ESG risk management. Collection of data obtained directly from customers on transition risks, which allow for a more accurate assessment by the Bank of the customer's ESG risk exposure.
	Transition risk for retail clients (related to the decline in property value, loss of part of income, or job loss due to overall economic situation).	Granting of retail mortgage loans financing properties with the best energy efficiency: PLN 410.2 million (in 2024, the Bank did not offer a product for retail mortgage loans financing properties with low energy demand for retail clients). Collection of data on energy efficiency of buildings for properties financed by retail mortgage loans.
	Opportunity related to the offering of sustainable financial products for corporate and retail	Expansion of the product offering supporting sustainable growth, including those based on public funding.

Material impact	Risk or opportunity for climate change mitigation	Measure
	clients.	Participation in industry initiatives to better understand transition needs and challenges, enabling appropriate development of product offering. Centre of competence for EU funds.

In 2025, Bank Millennium introduced new and continued existing solutions and products supporting sustainable financing for retail and corporate clients. The description of key actions and tools in this area is presented below.

Retail clients

EKO mortgage loan promotion for retail clients

Bank Millennium has launched a mortgage loan promotion designed to support the purchase of properties with low energy demand.

Clients meeting the promotion criteria can benefit from a reduced interest rate compared to the standard offer. The promotion applies to both primary and secondary market transactions, making it accessible to a wide audience.

Corporate clients

Sustainable financing for corporate banking customers

Bank Millennium actively supports the green transformation of the economy by financing projects that improve energy efficiency, thermal modernisation of buildings, development of renewable energy sources and circular economy solutions. The Bank has implemented internal instructions for identifying and monitoring sustainable financing and assessing ESG risk. Pursuant to these instructions, we recognise sustainable financing within granted investment loans (including those financing the investment under the sustainable partnership programme) and loans financing current operations of our clients (e.g. working capital loans, factoring). Similar instructions are in place in the leasing area, ensuring consistent standards for assessing sustainable financing across the entire Bank Millennium Group.

In this process, the Bank uses the ESG Questionnaire. In 2025, we introduced a digital process for handling the questionnaire in the Millenet for Corporates online banking platform. The new ESG Questionnaire allows clients to conveniently transmit information needed to assess whether a transaction or activity is sustainable and to analyse exposure to ESG risk. The process is intuitive, based on validation mechanisms, supports multiple users on the client's side and provides remote support from a relationship manager.

“NaszEauto” Programme

Millennium Leasing has made the “NaszEauto” (Our Car) programme available to clients running sole proprietorships intending to finance the purchase of electric vehicles. The programme is implemented in cooperation with the National Fund for Environmental Protection and Water Management (NFOŚiGW) and the Ministry of Climate and Environment. The programme offers:

- a subsidy up to PLN 30,000 for the leasing of brand new electric vehicles,
- an additional bonus of PLN 10,000 for scrapping a combustion engine vehicle that has been a fixed asset for at least 3 years.

The offer is available exclusively to sole proprietors. The “NaszEauto” programme supports the development of electromobility in Poland by allowing clients to replace vehicles with zero-emission alternatives and contributing to emission reductions in the transport sector.

MilleSun Programme

Millennium Leasing, under the MilleSun programme, offers leasing financing for photovoltaic installations and heat pumps. Clients can take advantage of an accelerated decision-making process for transactions up to the net amount of PLN 250,000 and preferential terms compared to standard market offers. The programme also supports the financing of installations on rented properties. The offer requires no own contribution, and the terms of financing is up to 96 months. Millennium Leasing is gradually scaling up the financing of green assets, including among others energy storage systems.

Green Loan

In 2025, Bank Millennium continued offering the “Green Loan” product to finance investments improving energy efficiency in businesses. The product is implemented based on a cooperation agreement with Bank Gospodarstwa Krajowego and co-financed with the European Funds for Modern Economy 2021-2027 programme (FENG). The Green Loan can be used to finance energy efficiency investments and switching to more eco-friendly energy sources, provided that they achieve primary energy savings at the minimum level of 30% in the project area. Examples of projects:

- replacement or modernisation of machinery, equipment and production lines with more energy-efficient ones,
- thermal modernisation of buildings used in business operations,
- purchase, installation and commissioning of renewable energy sources (RES),
- installation of control systems limiting energy consumption,
- modernisation of ventilation, air conditioning, cooling and lighting systems,
- replacement or modernisation of heating sources, including cogeneration.

The green premium is used to cover part of the loan principal, which allows clients to combine business growth with the adoption of modern, eco-friendly technologies.

Ekomax Guarantees

At the same time, in 2025, the Bank continued to grant investment loans with Ekomax guarantees, which can secure up to 80% of the loan amount financing energy efficiency projects, consisting in thermal modernisation of buildings or reduction by at least 30% of primary energy consumption. The offer is available to businesses from the SME sector, small mid-cap companies and mid-cap companies. SMEs can benefit from principal subsidies amounting to 20% of the loan principal.

Biznesmax Plus Guarantees

Under the ongoing cooperation between Bank Millennium and BGK, in 2025 the Bank continued to grant investment and working capital loans with free Biznesmax Plus guarantees. These guarantees cover up to 80% of new loan principal and can be granted as *de minimis* aid (among others for working capital loans) or regional investment aid (for qualified investment projects). The offer is addressed to SMEs, small mid-cap companies and mid-cap companies that meet innovative entity criteria or implement qualified projects (innovative, eco-innovative or supporting digital transformation). Additionally, SMEs can apply for differentiated subsidies depending on the loan type.

Investmax Guarantees

In 2025, the Bank provided financing using Investmax guarantees securing the repayment of loans, provided by BGK with an EIF counter-guarantee (InvestEU). The solution is addressed to SMEs, with special emphasis on microbusinesses, for which microfinancing guarantees are provided free of charge. Investmax guarantees may cover working capital and investment loans, securing up to 80% of the loan amount supporting, inter alia, ongoing business operations or net costs of investment projects implemented in Poland (development, modernisation or replacement projects).

Green Guarantees from KUKE S.A.

Bank Millennium has expanded its offering with green guarantees from KUKE S.A., which secure loans for companies implementing investment projects with significant climate mitigation impacts. KUKE S.A.'s green guarantees make it easier for companies undertaking climate-positive investments to access

financing. The minimum value of the guaranteed loan is PLN 10 million, and the project must be located in Poland and meet one of two conditions:

- it must contribute significantly to climate change mitigation (e.g. development of renewable energy sources, infrastructure modernisation to increase energy efficiency, reduction of CO₂ emissions, deployment of low-emission technologies),
- it must be carried out by an entity whose core business activity qualifies as contributing significantly to climate change mitigation.

Cooperation with Pracodawcy RP (Employers of Poland) – ELENA programme

Bank Millennium has additionally joined the ELENA (European Local Energy Assistance) programme implemented by Pracodawcy RP (Employers of Poland) on behalf of the European Commission and the European Investment Bank. The programme supports businesses in preparing technical documentation required for the implementation of investment projects resulting in energy efficiency improvements. Through the Bank's cooperation with Pracodawcy RP, clients gain access to a simplified application path for public funds and co-funding to cover the documentation preparation costs. Examples of investment projects eligible for the support:

- thermal modernisation of production and service facilities,
- replacement of lighting systems,
- modernisation of heating and cooling systems,
- installations using renewable energy sources (RES),
- improvement of production processes to increase energy efficiency.

The ELENA programme can cover up to 90% of the costs of preparation of technical documentation required to obtain a green loan or other financing sources. Subsidies are available to micro, small and medium-sized enterprises, as well as small mid-cap and mid-cap companies with up to 3,000 employees.

Business development loan

In August 2025, Bank Millennium expanded its corporate banking offering with the Business development loan, which does not require the purpose of funds to be specified. Additionally, companies whose activities are classified by the Bank as "green" are exempt from the arrangement fee on the granted loan.

The business development loan is a flexible financing arrangement, which does not require a specified purpose, so it can be used as working capital or to support investments: as own contribution or bridge financing for projects supported by grants and as financing for projects that are not eligible for public support.

Carbon footprint calculator available to corporate clients

Bank Millennium cooperated with the Climate & Strategy Foundation to develop a free online carbon footprint calculator, which is now available to businesses. The calculator can be used by all companies regardless of the sector and does not require the status of a Bank Millennium client.

The calculator supports the calculation of scope 1 and 2 greenhouse gas emissions in line with the GHG Protocol methodology. The tool uses up-to-date and reliable emission factors. After entering data on operations and energy consumption, users receive a report containing results and practical recommendations for reducing emissions and improving energy efficiency.

The Bank also has a procedure for identifying sustainable financing for both general-purpose and investment loans – the *Instructions for Identifying and Monitoring Sustainable Financing and Assessing ESG Risk*. For this purpose, the Bank uses the digital ESG Questionnaire in Millenet, which allows clients to conveniently submit data needed to assess financing as sustainable. A similar procedure has been implemented at Millennium Leasing.

In the corporate banking area, clients take advantage of support provided by a dedicated relationship manager. The Group also offers a wide range of educational content, including expert assistance from

the EU Funds Competence Centre team, which works with clients to develop the most advantageous financing options for investments, as well as the aforementioned carbon footprint calculator.

Millennium TFI

Products promoting environmental aspects ("light green products")

As at 31 December 2025, Millennium TFI offered three investment products promoting environmental or social aspects, compliant with Article 8 of the SFDR Regulation:

- Millennium Active Plan SFIO
- Millennium Balanced Plan SFIO
- Millennium Staid Plan SFIO

The same product status applied as at 31 December 2024. Investment strategies of those funds consider the Principal Adverse Impacts (PAI) of investment decisions on sustainability factors, which ensuring compliance with regulatory requirements.

Millennium TFI incorporates ESG factors into the investment decision-making process, treating them as a key element of investment value risk assessment. Millennium TFI assumes that issuers who incorporate good ESG practices into their strategies may potentially exhibit a lower level of investment risk, which may in turn support their perception as more attractive investment opportunities.

Climate mitigation actions – own operations

Although materiality analysis indicates that the largest climate impact of the Bank Millennium Group stems from the activities it finances, in 2025 we continued a range of initiatives to reduce our own emissions. These actions support the implementation of the *Transition Plan* and *Strategy 2028* objectives.

The actions aimed at reducing our own Scope 1 and 2 emissions (which accounted for 0.09% of the Group's total emissions in 2024 and 0.07% in 2025) are also embedded in operational activities related to building maintenance and utility purchases.

Electricity and energy efficiency

All electricity consumed by the Bank Millennium Group in 2025, as in 2024, came from renewable sources, which minimized the carbon footprint from energy consumption. The head office buildings in Warsaw (BREEAM certified), Wrocław (LEED GOLD) and Gdańsk (LEED GOLD) meet advanced efficiency standards. Smart BMS (Building Management Systems) in the headquarters optimise the operation of building engineering systems to reduce utility consumption.

The Gdańsk photovoltaic installation generated 21.68 MWh of electricity in 2025, further reducing demand for grid energy. In the head offices, more than 15,000 lighting fixtures were replaced with LEDs.

Optimisation of energy consumption and operation of building engineering systems

We continued efforts to reduce energy use by optimising the operation of ventilation, air conditioning and lighting systems. We also limited the operating hours of technical equipment by adjusting schedules and operating parameters.

Moreover, Bank branches use energy-efficient LED banners with automatic adjustment of operating hours. We continued the LED lighting replacement programme, which covered 230 branches by the end of 2025, up from 210 at the end of 2024. We also introduced solutions limiting air conditioning runtime by using control timers.

Additionally, server virtualisation reduced the number of physical devices in the data processing centre, which led to lower demand for energy and lower loads on cooling systems.

Employee mobility and transport emissions

The car fleet modernisation involved replacing petrol vehicles with hybrid vehicles and systematically increasing the share of plug-in, hybrid-in, hybrid and electric vehicles. Guidelines promoting low-

emission business travel were also introduced – the percentage of rail travel increased, and some meetings were held remotely.

Environmentally-friendly infrastructure and employee activities

Bike parking and changing/shower facilities were provided at all head office locations to support shifts in employee commuting habits. We also carried out a number of campaigns under the employee volunteering programme “Our People’25: Save the Planet”, which supported various environmental initiatives.

Climate change mitigation resources

The Bank assesses that the planned and taken climate change mitigation actions do not require considerable cash amounts. Actions to support the origination of sustainable financing do not require capital expenditures or considerable operational expenses and are part of the Bank’s core business operations relating to the origination of loans. In *Strategy 2028*, we assumed PLN 5 billion of new sustainable financing.

16.3.3 Targets related to climate change mitigation and adaptation

[E1-4, MDR-T] In line with *Strategy 2028*, we aim for net zero emissions by 2050 both from own operations (Scopes 1 and 2) and from our value chain (Scope 3). The Bank Millennium Group has set medium-term GHG emission reduction targets for own operations (Scopes 1 and 2), for the residential real estate portfolio, and the maximum emission intensity for the electricity production sector within the NFC portfolio, as described in the section devoted to the *Transition Plan* [E1-1]. The adopted interim targets align with the EU 55% reduction goal from 1990 levels and are based on expected impacts from identified decarbonisation levers.

GHG emission reduction targets were developed in collaboration with internal stakeholders across the Bank Millennium Group; the process involved a series of meetings and consultations with business units to ensure alignment with Group strategic goals and operational capabilities.

For Scopes 1 and 2, targets and emissions are reported in tCO₂e. Organisational boundaries for reduction targets are consistent with those used for GHG emissions calculation (see more in section 16.3.5 *Gross scopes 1, 2 and 3 and total GHG emissions*).

Progress towards the GHG reduction target in the RRE portfolio and the maximum GHG emissions in the electricity production sector will be measured using emission intensity – kgCO₂e /m² (RRE) and gCO₂/kWh (of electricity production), respectively.

Adopted GHG reduction targets are based on gross emissions. They do not include emission removals, carbon credits or avoided emissions as means of target achievement.

16.3.4 Energy consumption and mix

[E1-5] Energy consumption from processes carried out or managed by the Bank Millennium Group are calculated with the use of the same organisational limits as for the calculation of Scopes 1 and 2 GHG emissions (disclosure E1-6).

Energy consumption from fuel combustion in stationary and mobile sources was calculated based on physical fuel consumption data. The above consumption does not include the use of the Group’s vehicles for private purposes.

Electricity consumption was calculated in 70% based on physical data from the energy supplier, and in 30% it was estimated based on expenses and average energy prices. The electricity consumption by plug-in hybrid vehicles is calculated together with the electricity consumption of the office building (internal charging) or is invoiced by the supplier of cards that allow for charging at external stations. For the entire volume of electricity consumed in 2025 (at all outlets), guarantees of origin have been purchased and redeemed, certified by the Polish Power Exchange (TGE) through Certificates provided by the energy supplier for Bank Millennium and Millennium Leasing. Accordingly, using the market-based method, all of the electricity purchased in 2025 was classified as coming from renewable sources.

In addition, Bank Millennium has its own photovoltaic system on the roofs of Bank Millennium Group's buildings in Gdańsk. The energy generated from the PV plant is consumed on-site for our own needs.

The calculation of heat consumption was based on physical data or was estimated based on expenses. The Bank Millennium Group did not purchase steam or cooling in 2025. No limitations on applied estimation methods were identified.

The Group does not operate in sectors with a significant impact on climate and does not consume fuels as raw materials in its operations – all raw materials consumed are burned to produce energy. Neither does it consume energy from nuclear sources. The consumption of self-generated non-fuel renewable energy by the Group refers only to energy produced without fuel. It comes from its own PV installations. The Group does not offset energy consumption even if the energy produced on site is sold to and used by a third party. Energy acquired within organisational limits is not calculated as purchased or acquired energy. Steam, heat or waste cooling from industrial processes are not extracted. The Group does not use hydrogen as an energy source.

Energy consumption data has not been subjected to external attestation or validation by an external institution other than the assurance service provider.

Energy consumption and mix in 2025

Energy consumption and mix of the Bank Millennium Group	Year 2024	Year 2025
1) Total consumption of energy from fossil fuels [MWh]	25,786.2	26,137.0
Share of fossil fuels in the total consumption of energy [%]	60.2	61.2
2) Consumption of purchased or acquired electricity and heat from renewable sources [MWh]	17,022.0	16,518.4
3) Consumption of self-generated non-fuel renewable energy [MWh]	22.6	21.7
4) Total consumption of renewable and low-emission energy [MWh]	17,044.6	16,540.0
Share of renewable sources in the total consumption of energy [%]	39.8	38.8
Total energy consumption [MWh] (calculated as the sum total of lines 1 and 4)	42,830.8	42,677.0

16.3.5 Gross scopes 1, 2, 3 and total GHG emissions

[E1-6] In the current reporting period, the Bank Millennium Group discloses GHG emissions in accordance with mandatory ESRS standards, using principles from, among others, *The Greenhouse Gas Protocol Corporate Accounting and Reporting Standard Revised Edition (GHG Protocol)* and *Partnership for Carbon Accounting Financials The Global GHG Accounting & Reporting Standard, Financed Emissions, Part A, Third Edition (PCAF)*.

Explanation of base year emission recalculations.

The GHG Protocol permits base year emission recalculations in the following situations:

1. Structural changes in the reporting organisation with a significant impact on base year emissions.
2. Methodological changes, improved emission factor accuracy or activity data with a significant impact on base year emissions.
3. Discovery of calculation errors.

Due to significant changes in the 2024 emission calculation, which is the base year for scope 3 (while 2020 is maintained as the base year for scopes 1 and 2), it was decided to recalculate previously reported values. Referring to *GHG Protocol* guidelines on base year recalculations:

1. No structural changes occurred in the Bank Millennium Group that had a significant impact on base year emissions.
2. No calculation errors with significant impact on base year emissions were identified in the Group's emission calculations.
3. The emission calculation methods were changed in Category 13 for leased assets (for which sector values were used) and Category 15 for equity investments and corporate bonds, financed retail mortgages, commercial real estate financing and corporate financing of entities that do not report their emissions.
4. For the scope 3 category 13 calculation, the Bank changed its methodological approach by using a new data source for leased assets where the consumption of energy carriers is unknown or impossible to estimate, so currently a financial sector emission factor is used.
5. In the process of collecting data on properties financed by retail mortgages, which was continued in 2025, more data were obtained on the actual floor area and primary energy demand of buildings. This reduced the proportion of estimated data for properties in the retail mortgage portfolio.
6. During the process of collecting data on commercial real estate financing, which was continued in 2025, more actual data on financed commercial building were obtained. This allowed us to assign more precise emission factors to buildings, thereby reducing the uncertainty of estimation.
7. For equity investments and corporate bonds, as well as corporate loans granted to emission non-reporting companies, the methodology was changed by updating the data source for sector data calculations for this group of entities. The change involved including scope 3 emissions in sector data. Previously, the Bank included scope 3 emissions only for reporting companies, so no methodological change occurred for that part of the corporate portfolio.
8. Due to the changes listed in points 3-7, which significantly affect the Bank Millennium Group's calculations of scope 3 emissions in 2025 and subsequent years, a decision was made to recalculate the base year (2024).

GHG emission results for the Bank Millennium Group's in the base year (2024) before and after recalculation are presented below.

Scope of GHG emissions	Emission volume [tCO ₂ e] in 2024 before recalculation		Emission volume [tCO ₂ e] in 2024 after recalculation		Change [%]	
	Bank Millennium	Bank Millennium Group	Bank Millennium	Bank Millennium	Bank Millennium Group	Bank Millennium
Total Scope 1 GHG emissions	2,218.09	2,462.82	2,218.09	2,462.82	0%	0%
Total scope 2 GHG emissions according to the location-based method.	14,035.57	14,924.05	14,035.57	14,924.05	0%	0%
Total scope 2 GHG emissions according to the market-based method.	5,187.61	5,395.96	5,187.61	5,395.96	0%	0%
Total indirect scope 3 GHG emissions according to the location-based method.	4,972,496.48	6,101,114.67	7,575,175.94	8,836,711.62	52.34	44.84
Total indirect scope 3 GHG emissions according to the market-based method.	4,969,570.24	6,097,963.48	7,572,249.70	8,833,560.43	52.37	44.86
Category 13 Downstream leased assets	0.00	1,095,704.32	0.00	1,233,508.90	0.00	12.58
Category 15 Investments, including:	4,923,721.45	4,954,230.88	7,526,400.91	7,552,023.25	52.82	52.39
General Business Loans	1,566,237.09	1,566,237.09	4,227,643.04	4,227,643.04	169.92	169.92
Equity Investments and Corporate Bonds	2,105.48	2,105.48	4,249.28	4,249.28	101.82	101.82
Commercial Real Estate	21,022.44	21,022.44	57,556.52	57,556.52	173.79	173.79
Mortgages	439,091.12	469,600.55	341,686.75	367,309.09	-22.18	-21.78
Total GHG emissions (location-based method)	4,988,750.14	6,118,501.54	7,591,429.60	8,854,098.49	52.17	44.71
Total GHG emissions (market-based)	4,976,975.94	6,105,822.26	7,579,655.40	8,841,419.21	52.29	44.80

The table below presents GHG emission volumes for 2024-2025 for scopes 1 and 2, as well as the material scope 3 categories identified above, along with calculation methodology information.

GHG emissions for the Bank Millennium Group in 2025 r.

Scope of GHG emissions	Base year [tCO ₂ e]*	Emission volume [tCO ₂ e] in 2024 after recalculation	Emission volume [tCO ₂ e] in 2025	2024/2025 (% change)	2030 target	Annual % target / base year
Scope 1 and 2 GHG emissions						
Total Scope 1 and 2 GHG emissions (according to the market-based method)	26,777	7,858.78	7,547.01	- 3.97%	2,677.7	-9%
Scope 1 GHG emissions						
Total Scope 1 GHG emissions		2,462.82	2,564.01	4.11	N/A	
Percentage of Scope 1GHG emissions from regulated emission trading schemes**		-	-	-	-	
Scope 2 GHG emissions						
Total scope 2 GHG emissions according to the location-based method.		14,924.05	13,654.21	-8.51	N/A	
Total scope 2 GHG emissions according to the market-based method.		5,395.96	4,983.00	-7.65	N/A	
Significant scope 3 GHG emissions (material categories***)						
Total indirect scope 3 GHG emissions according to the location-based method.		8,836,711.62	10,571,493.06	19.63	N/A	
Total indirect scope 3 GHG emissions according to the market-based method.		8,833,560.43	10,568,721.37	19.64	N/A	
Category 1 Purchased goods and services		46,762.52	50,369.23	7.71	N/A	
Category 3 Fuel and energy-related activities (not included in Scope 1 or 2) (according to the location-based method)		4,416.95	5,438.00	23.12	N/A	
Category 3 Fuel and energy-related activities (not included in Scope 1 or 2) (according to the market-based method)		1,265.76	2,666.31	110.65	N/A	
Category 13 Downstream leased assets		1,233,508.90	1,259,877.26	2.14	N/A	
Category 15 Investments, including:		7,552,023.25	9,255,808.57	22.56	Emission intensity target*****	
General Business Loans		4,227,643.04	4,833,026.79	14.32		
Equity Investments and Corporate Bonds		4,249.28	5,110.05	20.26		
Project Finance		0.00	304.23	-		
Commercial Real Estate		57,556.52	50,407.22	-12.42		

Scope of GHG emissions	Base year [tCO ₂ e]*	Emission volume [tCO ₂ e] in 2024 after recalculation	Emission volume [tCO ₂ e] in 2025	2024/2025 (% change)	2030 target	Annual % target / base year
Mortgages		367,309.09	325,807.50	-11.30		
Sovereign Debt****		2,895,265.32	4,041,152.78	39.58		
Total GHG emissions						
Total GHG emissions (location-based method)		8,854,098.49	10,587,711.28	19.58	N/A	
Total GHG emissions (market-based)		8,841,419.21	10,576,268.38	19.62	N/A	

* Base year for Scopes 1 and 2 is 2020; for Scope 3 it is 2024.

** Bank Millennium Group entities, which do not conduct activities reported under the EU Emissions Trading System (EU ETS).

*** Scope 3 categories assessed as material in 2024 based on the Bank Millennium Group's emission materiality analysis.

**** Sovereign debt emissions including land use, land-use change and forestry (LULUCF). Emissions excluding this sector were 4,260,054.31 tCO₂e.

***** For Category 15, targets have been set for the residential real estate portfolio and maximum emission intensity for the electricity production sector within the NFC portfolio, as described in the section entitled Climate transition plan of Bank Millennium Group.

GHG Emission intensity in tons of CO₂e per million PLN of net revenue for the Bank Millennium Group in 2024 and 2025

Scope of GHG emissions	Total GHG emissions / million PLN of net revenue [tCO ₂ e/PLN million] in 2024 (after recalculation)	Total GHG emissions / million PLN of net revenue [tCO ₂ e/PLN million] in 2025	2024/2025 (% change)
Total GHG emissions (location-based method) per net revenue	862.03	987.80	14.59
Total GHG emissions (market-based method) per net revenue	860.80	986.73	14.63

The net revenue amount (denominator) for the Bank Millennium Group was determined using the table below:

Basis for determining net revenue amount for the Bank Millennium Group

Revenue item [PLN million]	1 January 2024 - 31 December 2024	1 January 2025 - 31 December 2025
Net revenue used to calculate GHG intensity:		
Interest income and similar income (in the financial statements)	8,823.13	9,120.24
Fee and commission income	1,058.32	1,078.77
Dividend income	3.63	4.31
Result from financial assets and liabilities held for trading	(7.21)	24.27
Net result on financial assets not held for trading measured mandatorily at fair value through profit or loss	19.13	89.47
Other operating income	374.20	401.41
Total	10 271,20	10 718,47

The amounts of the individual line items indicated in the table above are consistent with the amounts presented in *Annual Consolidated Financial Report of the Bank Millennium S.A. Capital Group for the 12-month period ending 31st December 2025*.

As part of its efforts to enhance the consistency of reported data, the Group updated the methodology for determining net revenue values used in calculating the emission intensity indicator by excluding the item "FX result" from the calculation. The value of this item, included in net revenue reported in the 2024 sustainability disclosures, amounted to PLN –178.87 million.

As a result of this adjustment, the emission intensity indicator for the previous reporting period was also recalculated.

Calculation methodology used

GHG emissions for Scopes 1, 2 and 3 were calculated in accordance with ESRS standards (Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU as regards sustainability reporting standards) and taking into account principles, requirements and guidance from the *GHG Protocol Corporate Standard (The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard Revised Edition, GHG Protocol Scope 2 Guidance, GHG Protocol Corporate Value Chain [Scope 3] Accounting and Reporting Standard)*. Additionally, as the Bank Millennium Group includes financial institutions, Scope 3 emissions for Category 15 (Investments) are disclosed in line with the requirements of the Standard developed by the Partnership for Carbon Accounting Financials (PCAF) Standard: *GHG Accounting and Reporting Standard for the Financial Industry – Part A “Financed Emissions”* (December 2022 version).

GHG emissions were calculated for the entire Bank Millennium Group, in line with organisational boundaries adopted in the financial statements for 2025, excluding one company in liquidation: Lubuskie Fabryki Mebli S.A. w likwidacji. This company conducted no operational activity in 2025.

The Group's organisational boundaries for emission calculations were determined using the operational control method. The companies that are included in GHG emission calculations for the Bank Millennium Group include:

- Bank Millennium S.A.
- Millennium Consulting S.A.
- Millennium TFI S.A. (a subsidiary of Millennium Consulting S.A.),
- Millennium Leasing Sp. z o.o.
- Millennium Bank Hipoteczny S.A.
- Millennium Goodie Sp. z o.o.
- Millennium Service Sp. z o.o.
- Millennium Telecommunication Services sp. z o.o. (including 2% associate of Millennium Leasing S.A.).

The adopted calculation methodology includes greenhouse gases per GHG Protocol: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulphur hexafluoride (SF₆), nitrogen trifluoride (NF₃), hydrofluorocarbons (HFC) and perfluorocarbons (PFC).

The unit of disclosed emissions is carbon dioxide equivalent (CO₂e). Emissions of non-CO₂ gases were calculated by multiplying their quantities by the GWP100 factor (100-year time horizon) based on the latest data published in IPCC (Intergovernmental Panel on Climate Change) reports. In several cases, the emission factor used covered carbon dioxide (CO₂) only, so in these cases the calculated emissions did exclude other GHGs. This situation applies to the calculation of emissions related to purchased electricity according to the location-based method (factor published by KOBIZE – National Centre for Emissions Balancing and Management) and emissions related to the purchased district heating (emission factors typical for heat suppliers and the average factor for district heating published by ERO – Energy Regulatory Office).

The scopes of disclosed Bank Millennium Group and Bank GHG emission covered, in accordance with GHG Protocol:

Scope 1 emissions were calculated using physical data on fuel consumption. A portion of source data used in calculations were estimated based on expenditures.

The calculations considered emissions from stationary sources (natural gas and fuel oil boilers), mobile sources (company vehicles powered by petrol and diesel) and fugitive emissions from refrigerant leaks in air conditioning equipment.

Fuel combustion in stationary sources:

Natural gas – physical data (m³) on consumption obtained or estimated, with DEFRA 2025 emission factor applied.

Fuel oil – physical data on fuel oil consumption obtained or estimated, with DEFRA 2025 emission factor applied.

Fuel combustion in mobile sources:

Diesel, petrol – physical data (in litres) on business fuel consumption was obtained, and emission factors from the DEFRA 2025 database were applied. Calculated GHG emissions exclude Group vehicles used for private purposes.

Fugitive emissions:

Refrigerants – physical data (kg) was obtained on refrigerant losses from equipment under the Bank Millennium Group's operational control were obtained, and emission factors from the DEFRA 2025 database were applied. In the process of identifying GHG emission streams, the area of air-conditioned car fleet, but given low GWP potential of R1234yf and incidental air-conditioning leaks in vehicles used by the Bank Millennium Group, this stream was excluded from 2025 emission calculations.

Biogenic emissions from biofuel additives in diesel and petrol were calculated based on actual fuel consumption per Scope 1 data. They were reported as emissions "beyond scopes". DEFRA 2025 emission factor was applied. For Bank Millennium, they were 120.85 tCO₂e; for the Bank Millennium Group: 135.80 tCO₂e.

Scope 2 emissions were calculated using physical data on electricity and heat consumption. A portion of source data used in calculations were estimated based on expenditures.

The calculations included indirect emissions from purchased electricity and heat. The Bank Millennium Group did not purchase steam, and purchased cooling was deemed immaterial for 2025 emissions.

Calculations regarding Scope 2 emissions were conducted using both required methodological approaches, namely the location-based method (using the average emission factor for Poland) and the market-based method (using emission factors specific to electricity and heat sellers from which the reporting entity makes contractual purchases of electricity in combination with instruments such as guarantees of origin or renewable energy certificates or based on public reports from heat suppliers regarding the fuel structure for heat production in a given district heating network).

Electricity – data on electricity consumption (in kWh) for approximately 70% of locations was obtained from the electricity supplier. In the remaining 30% of locations, electricity consumption is settled based on re-invoices, calculated as the share in the leased area or the cost of electricity. A small portion of these outlets has an electricity sub-meter. Calculations of the annual electricity consumption are based on cost data and quantitative data (expressed in physical units). Source of factors: for location-based – KOBIZE 2025 (for 2024); for market-based – supplier's factor confirmed by guarantees of origin along with a document confirming their cancellation.

The electricity consumption by plug-in hybrid vehicles is calculated together with the electricity consumption of the office building (internal charging) or is invoiced by the supplier of cards that allow for charging at external stations.

For the entire volume of electricity consumed in 2025 (at all outlets), guarantees of origin have been purchased and redeemed, certified by the Polish Power Exchange (TGE) through Certificates provided by the energy supplier for Bank Millennium and Millennium Leasing. As a result, indirect Scope 2 emissions (according to the market-based method) for electricity purchased in 2025 amounted to 0 tons CO₂e.

Additionally, Bank Millennium has its own photovoltaic (PV) installations mounted on the roofs of Bank Millennium Group buildings in Gdańsk. Energy produced from PV installations is consumed on-site for own needs, which results in a lower demand for purchased electricity.

Heat – the calculation of the annual heat consumption was based on quantitative data (expressed in physical units). Some source data, which formed the basis of the calculations, was estimated based on expenses. Source of factors: for the location-based method - ERO 2024; heat suppliers' factors were used for the market-based method.

Biogenic carbon dioxide CO₂ emissions from the combustion or biodegradation of biomass for scope 2 amounted to 924.93 tCO₂e for Bank Millennium according to the location-based method and 710.91 tCO₂e according to the market-based method. For the Group, they were respectively 968.73 tCO₂e according to the location-based method and 737.85 tCO₂e according to the market-based method.

Scope 3 emissions are indirect emissions resulting from the activities of the Bank Millennium Group, but originating from sources not owned or controlled by the Group. They were calculated using physical and financial data. GHG emissions were calculated for material scope 3 categories, selected based on the materiality assessment performed in 2025, which took into account the magnitude of the impact,

financial expenditures, transition risks, opportunities and stakeholder opinions across upstream and downstream value chain, and after considering all specific value chain requirements in other ESRS.

Materiality assessment was performed using the method for assessing the estimated impact of Bank Millennium Group's activities, where the criteria for individual categories were evaluated using the expert method. For most GHG emission estimates conducted (i.e., for categories 1 and 2, 5, 6), they relied on financial data. The factors used to convert financial data into GHG emissions came from Exiobase 3 data (data for Poland, marked "PL"), taking into account the exchange rate (the 2024 euro rate was 4.3064 PLN¹¹) and the inflation rate for 2019-2024 (0.81¹²). During the materiality analysis, scope 3 categories were identified: 9 (Downstream transportation) and 10 (Processing of sold products), which did not occur in Bank Millennium Group's activities in 2024, and therefore no estimated calculations of the emission were performed for these categories. Additionally, categories potentially related to environmental impact were analysed: 4 (Upstream transportation and distribution) and 12 (End-of-life treatment of sold products). The expert assessment concluded that these factors are immaterial to the activities of the Bank Millennium Group.

Based on the further detailed materiality analysis conducted in 2024, the following scope 3 categories were deemed immaterial: category 2 (Capital goods), 5 (Waste generated in operations), 6 (Business travel), 7 (Employee commuting), 8 (Upstream leased assets), 11 (Use of sold products), 14 (Franchises).

Based on the same analysis, the following scope 3 categories were deemed material:

- Category 1 – Purchased goods and services (material due to financial expenditures; immaterial due to impact and transition risks; no opportunities or materiality/immateriality of stakeholder opinions was identified),
- Category 3 – Fuel- and energy-related activities not included in scopes 1 and 2 (material due to financial expenditures, impact, transition risks, and stakeholder opinions),
- Category 13 – Downstream leased assets (material due to financial expenditures, impact, transition risks, and stakeholder opinions),
- Category 15 – Investments (material due to financial expenditures, impact, transition risks, and stakeholder opinions).

Main assumptions, data and emission factors used in scope 3 calculations

Category 1 - Purchased goods and services

Category 1 includes emissions related to the production of goods and services delivered in the current year to Bank Millennium.

Scope 1 GHG emissions were calculated using spend-based method) and emission factors available in the external Exiobase database were adopted.

Category 3 – Fuel- and energy-related activities not included in scopes 1 or 2

Category 3 includes emissions related to the extraction, production, and transportation of fuels and energy purchased by Bank Millennium in 2025, which were not included in scope 1 or 2. This category also includes losses on transmission of electricity and heat.

The data on which calculations in this category relied were physical data underlying scope 1 and 2 calculations from natural gas, heating oil, diesel, and petrol consumption (Scope 1) and from electricity and heat consumption (scope 2). Emission factors came from the DEFRA database (2025, v.1_1; GWP100, AR5).

Category 13 – Downstream leased assets (from lessor's perspective)

Category 13 includes emissions from the operation of assets owned by Millennium Leasing (acting as the lessor receiving payments for this service) and leased to other entities in the reporting year, which are not covered by scope 1 or scope 2.

In order to calculate category 13 emissions, the lessor-specific method from the *GHG Protocol* was used, which included data on scope 1 and scope 2 emissions of lessees and allocation of those emissions to the relevant leased assets.

¹¹ NBP; average weighted exchange rate; www.nbp.pl/home.aspx?f=/kursy/arch_a.html

¹² www.in2013dollars.com/europe/inflation/2023?endYear=2015&amount=1

Bank Millennium's GHG emissions related to leased assets were calculated for the following groups:

- light transport
- heavy transport (trucks >3.5t and tractor units)
- buses and coaches
- other means of transport
- machinery and equipment
- real property

Greenhouse gas emissions for light transport were calculated as the product of the emission factor and the estimated annual mileage for the entire 2025 year. The emission factor was obtained from the DEFRA database taking into account the national energy mix. For vehicles with unknown drive type, a separate emission factor was calculated taking into account data on the percentage share of vehicles with a given drive/fuel in Poland and DEFRA factors. The annual mileage of leased vehicles was estimated by the Bank on the basis of data from the Central Vehicle and Driver Register (CEPIK).

Greenhouse gas emissions for heavy transport were calculated as the product of the emission factor and the estimated or actual fuel consumption obtained from clients. The emission factor was obtained from the *Carbon Footprint in Leasing STANDARD 2.0* study within the ESG project run by the Polish Leasing Association. Fuel consumption was estimated by using average annual mileages calculated based on CEPIK data and average fuel consumption per 100 km calculated based on the European Environment Agency database.

Greenhouse gas emissions for buses and coaches were calculated as the product of the emission factor and the estimated or actual fuel or electricity consumption obtained from clients for the whole year 2025. The emission factor was obtained from KOBIZE for electric vehicles and from the study entitled the *Carbon Footprint in Leasing STANDARD 2.0* study within the ESG project run by the Polish Leasing Association for the remaining vehicles. Fuel consumption was estimated by using average annual mileages calculated based on CEPIK data and average fuel consumption per 100 km calculated based on the data from the Municipal Bus Company in Warsaw for electric vehicles and data from clients for the remaining vehicles.

Greenhouse gas emissions for other means of transport were calculated as the product of the emission factor and the estimated or actual fuel consumption obtained from clients. The emission factor was obtained from the *Carbon Footprint in Leasing STANDARD 2.0* study within the ESG project run by the Polish Leasing Association. Due to the diversity of other means of transport, the highest factors were applied – for vehicles in the over 3.5 t category. For vehicles with unknown fuel type, an average emission factor across fuel types was applied. Fuel consumption was estimated by using average annual mileages calculated based on CEPIK data or the average for the entire group of other means of transport and average fuel consumption per 100 km calculated based on client data or *The Economic Importance of Motorcycles to Europe* report prepared by ACEM, the European Association of Motorcycle Manufacturers.

The machinery and equipment portfolio was divided into categories for which the following data and calculation approaches were assumed:

- forklifts were included in the calculation based on estimated data on annual hours of use and electricity emission factor,
- construction machinery was included in the calculation based on the estimated annual fuel consumption and the emission factor for diesel fuel,
- photovoltaic installations and energy storage systems were treated as not emitting GHG, so zero scope 1 and 2 emissions were assumed,
- non-energy-consuming equipment such as canopies, containers, racks – zero scope 1 and 2 emissions were assumed,
- others – in the absence of data sufficient to estimate energy consumption by the leased asset, emissions were estimated based on financial ratios, i.e. emission factors based on the client's sales revenues (calculated on the basis of the client's financial data or sector-specific data from the Main Statistical Office (GUS) and PCAF sector-specific emission factors). Such calculated client emissions were multiplied by the share of the total value of the leased asset in the client's total balance sheet.

Carbon footprint calculations for real estate in the leasing portfolio were based on publicly available PCAF emission factors for commercial real estate for 2023, expressed in tons of CO₂ equivalent per m²

of building or based on energy class expressed in tons of CO₂ equivalent per kWh from the building's energy performance certificate.

Category 15 – Investments

Category 15 is intended for investors and financial service providers, including commercial banks, whose investment activities (including equity and debt investments and project finance) are not included in scope 1 and scope 2. The requirements developed by the *GHG Protocol* define the framework principles for calculating greenhouse gas emissions in all scopes, whereas for scope 3 category 15 Investments, emissions are calculated based on a detailed methodology developed by the Partnership for Carbon Accounting Financials (PCAF): *GHG Accounting and Reporting Standard for the Financial Industry, Part A Financed Emissions* (December 2022 version).

GHG emissions under the PCAF Standard are calculated for 7 asset classes; of which 6 following were considered for Group purposes:

1. general business loans
2. equity investments and corporate bonds
3. project finance
4. commercial real estate
5. mortgages
6. sovereign debt

The Bank Millennium Group does not have a portfolio of loans financing motor vehicles.

Financed emissions were calculated for each asset class separately, taking into account the magnitude of emissions of each activity and the appropriate attribution factor determining the share of the Bank Millennium Group's exposure in financing the activity or asset component.

1. General Business Loans

The *Business Loans* asset class includes on-balance sheet credit exposures not held for trading, intended for general corporate purposes, i.e., with unknown use of proceeds, to businesses, non-profits, and other organisations. In the Bank Millennium Group, this asset class includes the corporate loan portfolio, comprising exposures to corporate clients that maintain accounting records, excluding project finance and commercial real estate loans.

Financed emissions for the *Business Loans* asset class were calculated as the product of the attribution factor all of the company's emissions (as reported by the borrower or estimated by the Group). Where borrower emissions data were unavailable, the attribution factor was multiplied by the borrower's revenue and a sector-specific emissions factor (derived from PCAF data). If the borrower's revenue data are not available, average revenues of corporate clients were estimated based on financial data and the number of non-financial enterprises in individual sectors published by the Central Statistical Office (GUS).

In some cases, where the necessary financial data could not be estimated, attribution factors were adopted based on the estimated share of Bank Millennium in the customer's liabilities, without considering that the company may partially finance its activities with equity. This approach may result in overstating emissions estimated for these clients.

Sectoral emissions were calculated by multiplying the exposure by the PCAF sectoral emission factor for financial sector customers due to the unavailability of uniform statistical data or for companies for which sectoral financial data were unavailable.

According to the PCAF methodology, the attribution factor was determined as the ratio of the outstanding amount to the total financing of the company's activities expressed as:

- sum of equity and debt – for unlisted companies and for listed group companies without EVIC (Enterprise Value Including Cash) data, or
- EVIC – for listed companies.

2. Equity Investments and Corporate Bonds

According to the PCAF standard, the *Equity Investments and Corporate Bonds* asset class includes:

- *Listed Equity and Corporate Bonds* - all listed equity and all listed corporate bonds for general corporate purposes, i.e., with unknown use of proceeds according to the *GHG Protocol*, and
- *Unlisted Equity* – unlisted equity investments with unknown use of proceeds in businesses, non-profits, and any other organisations.

Financed emissions calculations included securities of companies serviced by the Treasury Department. Each investment was considered individually, which included an analysis whether it was a debt or equity investment and whether the security was traded.

Financed emissions for this asset class were calculated as the product of the attribution factor and the total emissions of the company (reported by that company or estimated by the Group). When company emission data were unavailable, revenue-based emission factors were used (sector-specific, calculated based on GUS data).

According to the PCAF methodology, the attribution factor was determined as the ratio of the investment value to the total financing of the company's activities expressed as:

- sum of equity and debt – for unlisted companies, or
- EVIC (Enterprise Value Including Cash) – for listed companies.

3. Project Finance

The *Project Finance* asset class encompasses all loans and equity investments in projects or activities for specific purposes, i.e., with known use of proceedings according to the GHG Protocol definition. Financed activities include e.g. construction of and energy production from gas power plants, or photovoltaic or wind installations.

In its corporate portfolio, the Bank Millennium Group has exposures that constitute financing of renewable energy sources (RES), for which financed emissions were calculated as the product of the attribution factor and total project emissions estimated by the Group or reported. Since the renewable energy sources financed by the Bank are photovoltaic installations and wind farms, the Bank Millennium Group has adopted the approach that they do not emit greenhouse gases into the atmosphere. The Group did not use the options provided by the PCAF standard to calculate emissions avoided or removed, as data necessary for such calculations were not available.

In 2025, financed projects emerged that did not constitute RES financing. For these cases, it was not possible to obtain project emissions (energy efficiency). Emissions were calculated taking into account the PCAF sectoral factor for all three emission scopes.

According to the PCAF methodology, the attribution factor was determined as the ratio of the outstanding amount to the project value expressed as the sum of the project's equity and debt.

4. Commercial Real Estate

The PCAF Standard defines commercial real estate loans as on-balance sheet loans for the purchase and refinance of commercial real estate, including:

- real estate used for the borrower's own activities, and
- real estate leased by the borrower for residential or commercial purposes of the tenant.

The calculation scope for this asset class includes emissions from buildings in operation and optionally from their construction.

When an equity investment in commercial real estate is listed on a securities exchange, it is included in the calculation of financed emissions for the *Equity Investments* asset class. Additionally, the *Commercial Real Estate* asset class does not include loans secured by commercial real estate but intended for other purposes than its purchase, for example for general corporate purposes – emissions from these assets are included in the calculations for *General Corporate Loans*.

Financed emissions calculations for the *Commercial Real Estate* asset class incorporated the largest structured financings granted by the Group, for which detailed data on financed real estate were available. In the absence of data, emissions from these real estate were included in calculations for the *Business Loans* asset class.

Financed emissions from the commercial real estate portfolio were calculated as the product of the attribution factor and the total estimated by the Group or reported commercial real estate emissions. For most real estate, the Group had energy consumption data from the building's energy performance certificate or estimated based on the EPC model. In order to calculate emissions from real estate, we used the building area in m² as stated in the loan agreement, annual energy demand, and PCAF emission factors (broken down by building type and emissions in tCO₂e/MWh). If energy demand data were not available, PCAF emission factors based on the real estate area were used. For consortium loans, both initial value and building area were allocated proportionally to the Bank's share in the consortium.

In accordance with the PCAF methodology, the assumed attribution factor was the ratio of the outstanding amount to the initial property value. If the initial property value at financing origination was unknown, the Group used the latest available property appraisal amount at the moment the carbon footprint accounting began. In the event of a material modification of the loan, defined by the PCAF standard as an increase in financing amount, refinancing, or extension, the property value was updated. The outstanding amount was the borrower's debt, whose balance decreased over time to 0 at the end of the loan term.

5. Mortgages

The *Mortgages* asset class includes loans for the purchase and refinancing of residential properties, i.e., exclusively properties used for residential purposes and not for commercial activities. This asset class does not include home equity loans and home equity lines – these are generally consumer loans for general consumer purposes for which PCAF has not yet developed an emissions calculation methodology.

In the emission calculations, the Bank Millennium Group included exposures financing residential properties and developed land used on the balance sheet date by the end user. Mortgage loans for construction or modernisation of buildings constitute an optional scope under the PCAF standard, which was not included in the Group's financed emissions since the relevant data were not available. Zero emissions were assumed for land and properties under construction (not used on the balance sheet date).

Furthermore, a mortgage refinancing loan granted by the original lender replaced the original loan. In contrast, where refinancing is provided by another institution, the exposure and associated emissions transferred to the refinancing institution.

Financed emissions for *Mortgages* were calculated as the product of the attribution factor and the total emissions from that residential property as estimated by the Group. Emissions from residential properties were calculated using data from energy performance certificates. Where EPC data were unavailable, emissions were estimated using the adopted EPC model, based on the property's annual energy demand (kWh/m²), property area (m² from the Bank's internal database), and PCAF emission factors (tCO₂e/MWh, disaggregated by residential property type).

According to the PCAF standard, the attribution factor corresponded to the LTV ratio, i.e. the ratio of the outstanding amount to the initial property value. If the initial property value at financing origination was unknown, the latest available property appraisal amount was adopted for the moment the carbon footprint accounting began.

6. Sovereign Debt

The *Sovereign Debt* asset class includes sovereign (treasury) loans and sovereign bonds denominated in any currency. Excluded from the methodology are exposures to central banks (unless they issue sovereign debt on behalf of governments) and exposures to local government units and municipal companies. Supranational issuers may also be included in this asset class, provided it does not lead to double counting of emissions from a given country.

The Bank Millennium Group calculates the carbon footprint from treasury debt securities it holds, while excluding the trading portfolio.

Financed emissions for the *Sovereign Debt* asset class were calculated in accordance with the PCAF standard as the product of the attribution factor and the emissions of the given country. The attribution factor for *Sovereign Debt* was adopted in line with the PCAF standard as the ratio of the book value of bonds to GDP adjusted for purchasing power parity. Since the GDP adjusted for purchasing power parity published by the World Bank for each country is expressed in international dollars (US dollar), in order to calculate the attribution factor, the amounts of treasury securities denominated in PLN were converted to US dollars using NBP Table A exchange rates.

Country greenhouse gas emissions are defined by PCAF in 3 scopes, of which the Bank Millennium Group calculations used only scope 1 – domestic emissions from sources located within the country's territory. Scope 2 – emissions occurring as a consequence of the domestic use of grid-supplied electricity, steam, heat, or cooling which is imported from another territory, and scope 3 – emissions attributable to imports of goods and services – were not included in the calculation of *Sovereign Debt* emissions because the OECD (the data source named in the PCAF) ceased the publication of necessary data for the latest period and the factors made available to PCAF signatories against payment refer to scope 1 only.

Biogenic emission data is unavailable for all Group assets generating emissions in scope 3 category 15.

Percentage of scope 3 emissions calculated using primary data obtained from suppliers or other value chain partners in the Bank Millennium Group

Primary data sources by category	Emission volume [tCO ₂ e] in 2024	% of scope 3 emissions calculated using primary data in 2024	Emission volume [tCO ₂ e] in 2025	% of scope 3 emissions calculated using primary data in 2025
Cat. 1	46,762.52	4.58%	50,369.23	3.27%
Cat. 3	1,265.76	0.12%	5,438.00	0.35%
Cat.13 Data from customer surveys	66,019.68	6.47%	40,629.37	2.64%
Cat.15 Company reports:	837,417.80	82.07%	1,392,506.67	90.32%
In general business loan portfolio	832,558.34	81.60%	1,379,322.71	89.46%
In equity investments and corporate bonds portfolio	10.44	0.00%	6.00	0.00%
In commercial real estate portfolio	4,849.02	0.48%	13,177.96	0.85%
Cat.15 Energy performance certificates in the mortgage loan portfolio	68,848.14	6.75%	52,808.32	3.43%
Total	1,020,313.90	100.00%	1,541,751.59	100.00%

16.3.6 GHG removals and GHG mitigation projects financed with carbon credits

[E1-7] The objective of the disclosure of information about GHG removals and GHG mitigation projects financed through carbon credits is to provide an understanding of the undertaking's actions to permanently remove or actively support the removal of GHG from the atmosphere, potentially for achieving net-zero targets and to provide an understanding of the extent and quality of carbon credits the undertaking has purchased or intends to purchase from the voluntary market, potentially for supporting its GHG neutrality claims. The scope of the disclosures is inadequate to the business activities conducted by the Bank Millennium Group, because it does not perform such projects in the area of its own operations and neither does it finance such projects.

16.3.7 Internal carbon pricing

[E1-8] The Bank Millennium Group does not apply any internal carbon pricing systems.

17. Bank Millennium Group Employees (ESRS S1)

17.1 Workforce strategy

17.1.1 Interests and views of stakeholders

[SBM-2] Bank Millennium Group treats the opinions of its employees as a critical element of its management process and of building an organisational culture based on dialogue, trust and mutual respect. This approach is reflected in the *Bank Millennium and Group's Strategy for 2025-2028*, entitled "*Strategy 2028 – Value and Growth*" (*Strategy 2028*), which included, among others, initiatives addressing the results of an employee satisfaction survey carried out in the form of a questionnaire, as well as other forms of feedback.

Group provides its employees with various channels to submit their views, ideas and comments through:

- regular employee surveys (covering the entire Group starting in 2025)
- anonymous whistleblower process that ensures speech safety,
- electronic feedback boxes,
- open meetings with the management staff.

Until 2024, regular satisfaction and engagement surveys were conducted solely within Bank Millennium, which operates as the parent entity. The survey results were used to design initiatives targeting the Bank's employees and — in selected areas — were recommended to the Group's companies. Starting in 2025, the satisfaction surveys were expanded to cover the entire Bank Millennium Group, enabling systematic monitoring of employee needs across all subsidiaries and ensuring a consistent approach to human capital management.

Each submitted opinion by an employee is thoroughly reviewed and considered in line with the principles of transparency and responsibility. The Bank uses the opinions from employees to continuously improve its work environment, operating processes and internal policies. Information on actions undertaken in response to reports is communicated to employees among others via Internet, newsletters and team meetings.

The process of collecting and analysing opinions is performed regularly (at least once a year), which allows employee needs and expectations to be monitored. The Bank evaluates the effectiveness of any solutions that have been implemented based on subsequent surveys, engagement indicators and quality feedback.

17.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model

[SBM-3] The issue of material impacts, risks and opportunities and their interaction with strategy and business model covers all own workforce, as is discussed later on in section 17.2 *Employee characteristics*.

In the course of identifying impacts in the own workforce area, we have categorised a total of thirteen significant issues. They include twelve positive impacts and one opportunity. We have not identified any risks or negative impacts in this area.

The material issues are categorised under the following three sub-topics from the ESRS guidelines:

IRO Type	Material impact, risk or opportunity - description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain			Time horizon		
ESRS S1 Own workforce							
Working conditions of own workforce							
Positive actual impact	Impact related to ensuring a safe working environment		●		●		
Positive actual impact	Impact related to the provision of security of employment		●		●		
Positive actual impact	Impact resulting from measures in place to support employees' work-life balance		●		●		
Positive actual impact	Impact resulting from strictly defined working hours and overtime monitoring		●		●		
Positive actual impact	Impact related to measures taken to ensure adequate compensation		●		●		
Positive actual impact	Impact through establishing effective channels of communication with employees		●		●		
Positive actual impact	Impact through ensuring freedom of association of employees and cooperation with trade unions		●		●		
Equal treatment and equal opportunities for all							
Positive actual impact	Impact related to the promotion of gender neutrality, including in the area of employee compensation		●		●		
Positive actual impact	Impact related to attention to the development of employees' skills, including through training		●		●		
Opportunity	Opportunity related to strategic employee development		●		●	●	●
Positive actual impact	Impact related to taking measures to prevent violence		●		●		
Positive actual impact	Impact related to the promotion of diversity		●		●		
Other work-related rights							
Positive actual impact	Impact related to the protection of privacy and personal data of the Group's own workforce		●		●		

All these issues are detailed in the ESRS S1 thematic sections of the report concerning own workforce.

17.1.3 Policies related to own workforce

[S1-1] In the Bank Millennium Group, the employee management model is based on the central role of the Bank as the parent entity. The Bank develops, updates, and approves internal regulations related to employment matters, including policies, procedures, and standards of conduct. These documents are subsequently distributed to the Group's subsidiaries, which may adopt them as their internal regulations - either in their original form or adjusted to the specific nature of their operations. This approach ensures consistency across the Group while allowing for the particular operational needs of each subsidiary.

The Bank's Human Resources Department, acting as the central unit, is responsible for overseeing the application of regulations in the area of employee management. The Department monitors the effectiveness of the implemented policies, their compliance with legal requirements and international standards, and coordinates the process of reviews and any necessary updates.

To ensure transparency, efficiency and consistent HR standards across the entire Group, the Bank provides all employees of the Group's companies with a set of tools supporting daily HR processes, including:

- an anonymous whistleblowing channel available Group-wide,
- a system for managing mandatory and development training,
- a system for working time and leave management,
- an HR Portal enabling employees to submit HR-related questions, issues and requests,
- a system for reporting workplace-related technical problems.

Through these solutions, employees have easy access to information and are able to become actively involved in internal processes. The employer, in turn, can monitor compliance in real time, analyse effectiveness of the implemented policies and make appropriate adjustments if needed.

To continuously improve HR processes, the Bank plans further step to digitise HR processes, automate selected functions and develop tools supporting employee well-being and engagement.

Workforce policies and procedures are developed in line with applicable laws and internationally recognised instruments, including the *UN Guiding Principles on Business and Human Rights*, *ILO Conventions*, and *OECD Guidelines for Multinational Enterprises*. The Bank strives to ensure that the regulations promote respect for human rights, equal treatment, and high ethical standards in relations with employees.

In 2025, the Code of Ethics was updated to align it with current regulatory requirements. The changes included clarifying the rules regarding permitted communication channels, social media activities, protection of confidential information, prevention of conflicts of interest, and the implementation of provisions arising from the Whistleblower Protection Act.

The document is available on the Bank's website at: www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance.

Work Rules and Regulations in the Bank Millennium Group

Within the Bank Millennium Group, the primary document defining employee rights and obligations, as well as the rules governing work organisation and occupational safety, is the Work Rules and Regulations. *The Work Rules and Regulations in Bank Millennium S.A.* are approved by the Management Board of the Bank following consultation with the Trade Unions, in accordance with the applicable labour law provisions. Employer-related duties are performed by the President of the Management Board supervising the Human Resources Department and the Director of the Human Resources Department.

As the parent entity, the Bank serves as the central body responsible for developing regulations governing the employee area across the Group. The Bank's Work Rules and Regulations serve as a reference point for the other Group companies. Each company within Bank Millennium Group is a separate employer and has its own Work Rules and Regulations, implemented on the basis of the Bank's Work Rules and Regulations. These documents may be adopted either in a form consistent with the original or adjusted to the specific nature of the company's operations. This approach ensures consistent standards across the Group while maintaining formal compliance with the requirements arising from the separate employer status of each company.

The *Work Rules and Regulations* in the Group's companies cover, among others:

- rules for work organisation and working time,
- employment conditions,
- occupational health and safety (OHS) and information security rules,
- obligations of employees and the employer.

Bank Millennium Group Code of Ethics

Bank Millennium Group considers the conduct of business in a sustainable and ethical manner to be among the fundamental principles of its operation, stemming directly from the Group's mission and values. The *Code of Ethics* serves as the primary tool laying down the ethical and professional standards followed by the Group workforce. It is a collection of values and principles that guide the Group in its relations with employees, business partners and local communities. It promotes a work culture based on honesty, respect and equality, fostering a sense of security and stability among employees.

The *Code of Ethics* has been approved by the Supervisory Board and applies to all employees of the Bank Millennium Group. The Compliance Department is responsible for articulating the principles of the *Code of Ethics*, communicating and promoting ethical values and evaluating the adherence to the principles of ethics.

Compensation policy for employees of the Bank Millennium Group

The policy articulates the assumptions used to shape the fixed and variable components of compensation for all employees in the Group while taking into account the tasks and degrees of power

assigned to the teams and units concerned. It aims to provide a formal framework for shaping the practice of compensating all the Group's employees from the perspective of corporate governance, institutional safety and the adequacy of compensation to the Group's standing, scale of operations and growth potential. All individual solutions concerning compensation systems are prepared according to the principles prescribed by this policy.

Compensation policy for Members of the Bank Millennium S.A. Management Board and Supervisory Board

The document governs the principles of employee compensation for the Bank's top management bodies.

Compensation policy for risk takers in the Bank Millennium Group

The policy provides a formal framework for shaping employee compensation for a separate group of senior managers in the Bank Millennium Group, identified as exerting a material impact on the Group's risk profile – also known as Risk Takers.

The Bank's Management Board is responsible for the implementation of all the above compensation policies. The Bank's Management Board develops, implements, maintains and ensures the operation of the compensation policies that are suitable for the management system and risk strategy and the internal control system in the Bank Millennium Group.

The Bank's Supervisory Board is responsible for approving the compensation policies, which prepares and presents to the Bank's Shareholder Meeting a report on the assessment of the functioning of compensation policies in the Bank Millennium Group.

The implementation of the compensation policies in the Bank Millennium Group is subject opinions by the Personnel Committee of the Bank's Supervisory Board. In its report to the Bank's Supervisory Board, the Personnel Committee of the Bank's Supervisory Board presents its conclusions regarding the functioning of the Compensation Policies.

The Bank's Shareholder Meeting is responsible for assessing whether the approved Bank Millennium Group compensation policies support growth and security. The Bank's Shareholder Meeting makes the above assessment on the basis of the annual report on the assessment of the functioning of the compensation policies in the Bank Millennium Group, which is prepared and presented by the Bank's Supervisory Board.

The compensation of senior managers is set by the Personnel Committee of the Bank's Management Board and the compensation of the Bank's Management Board members is determined by the Personnel Committee of the Bank's Supervisory Board.

Human Rights Policy of the Bank Millennium Group

Our approach to the protection and respect of human rights is set out in *The Human Rights Policy*, implemented as part of the *Policy on Sustainability Principles* and approved by the Bank's Management Board.

Respect for human rights is one of the Group's key objectives and commitments, and the Group conducts its activities based on the principles of social responsibility, including the implementation of the UN Sustainable Development Goals. The Bank Millennium Group declares compliance with national and international human rights law.

Under this policy, we have adopted the following principles:

- **Prohibition of forced labour, child labour and human trafficking** – we reject all forms of forced labour, including related to human trafficking, forced labour and child labour or modern forms of slave labour, in compliance with Polish and international law.
- **Prohibition of discrimination and violation of labour rights** – we promote a culture of tolerance and reject all forms of discrimination based on origin, gender, sexual orientation, family situation, nationality, ethnicity, religion, membership in social groups and political beliefs, or any kind of individual physical characteristics, health conditions or disabilities. We provide a healthy and safe work environment, free from discrimination, bullying, harassment and any and all forms of violence.
- **Freedom of association** – we respect the freedom of association and support the activity of employee organisations, including trade unions, to operate in accordance with applicable laws.

- **Employee compensation** – we promote fair and equitable compensation for our employees, based on their qualifications, experience, responsibilities and functions. We comply with national and international laws, particularly the Labour Code, and all pertinent internal regulations.
- **Work-life balance** – we create conditions that foster balance between professional and private lives.
- **Employee relations** – we promote human rights in our relations with employees by applying relevant internal regulations, including the *Code of Ethics*, which defines principles of transparent and healthy cooperation.

Diversity Management Policy of the Bank Millennium Group

Our approach to diversity is set out in the *Diversity Management Policy*, implemented as part of the *Policy on Sustainability Principles* and approved by the Bank's Management Board.

Our *Diversity Management Policy* applies to all Bank Millennium Group employees and is aimed at promoting a culture of mutual respect, identifying diversity, ensuring equal opportunities, preventing exclusion and eliminating all forms of discrimination. The Bank's Management Board is responsible for implementing the policy.

In line with the *Diversity Management Policy*, the Bank Millennium Group operates on the principle of respect for human dignity and equal treatment, regardless of age, gender, ethnic or national origin, financial status, religion, family status, sexual orientation, health condition, beliefs, trade union membership, or other characteristics that may lead to discrimination.

The principle of diversity is reflected in internal regulations and implemented in key areas such as:

- Adequate working conditions – we create an environment that fosters integration and equal treatment,
- Raising awareness – promoting knowledge and attitudes that support diversity,
- Employee development – supporting skills growth in an atmosphere of equality and respect.

Under this policy, the Bank Millennium Group promotes values based on absolute respect for human dignity and diversity, with zero tolerance for discrimination. Remuneration and promotion decisions are based solely on competencies and performance.

Procedure for dealing with reports from employees, including those suggesting bullying or discrimination in Bank Millennium S.A.

In order to ensure the implementation of adopted commitments and principles in policies and other internal regulations, the Bank has put in place a procedure, which helps prevent instances of discrimination, react to reports and build work environment based on diversity and mutual respect.

The procedure governs and describes the process of employee notifications, which may include, in particular: suspected bullying, discrimination, inappropriate behaviour, breaches of personal rights or violation of the Bank's rules of social coexistence.

The procedure applies to all employees of the Bank and is issued by way of communication from the Director of the Human Resources Department.

HR Policy

The *HR Policy*, approved by the Bank's Management Board, defines the framework for human resources management in the Bank Millennium Group. It is based in the organisation's mission and values, outlining both the management model and the regulations forming the legal basis for the HR and payroll system.

The document specifies the main areas of activity of the HR Department:

- Recruitment and onboarding: ensuring professionalism of the employee recruitment and adaptation process,
- Remuneration and benefits: developing competitive and fair compensation systems,
- Training and development: supporting skills growth and career paths,
- Leadership: building a culture of leaders aligned with organisational values,
- Employee opinion surveys: monitoring satisfaction and engagement,

- Digitisation of processes and data analysis: implementing modern tools and technology solutions.

The Policy defines aspirations in these areas, referring to the *2028 Strategy*, and reflects the ambitions in the field of human capital management.

Its goal is to ensure consistency and transparency of HR processes, foster employee growth, promote organisational values, and adapt its activities to market trends and demands of the modern labour market.

The HR Department is responsible for implementing this policy and its provisions are binding on all Bank Millennium Group employees.

Instructions for participation in training programmes at Bank Millennium S.A.

Training and development activities in the Bank are carried out with a view to improving the competencies of employees, enhancing the quality and efficiency of work, and as a result – contributing to current and future strategic goals.

The Instructions constitute an internal operational document that contains the rules and describes all necessary information on the process of providing training to Bank employees. In accordance with the recommendation of the Bank's Management Board, the rules set out in the Instruction should be applied by the Group's companies. The document is approved by the Bank's Management Board and the Human Resources Department, which is in charge of arranging training for employees within the scope of its powers and is responsible for its implementation and updating.

Instructions for managing occupational health and safety and fire protection in Bank Millennium S.A.

Occupational Health and Safety activities are regulated in the *Instructions for managing occupational health and safety and fire protection in Bank Millennium S.A.* They include standard occupational health and safety topics, fire protection, labour law basics and training in these areas for all Bank Millennium employees.

Pursuing the task of implementing and updating the Instructions is the responsibility of the Occupational Health and Safety Team with the participation of the Bank's relevant units. The Bank's Management Board is responsible for approving the Instructions as a document applicable to all employees of Bank Millennium.

The Bank does not have a separate policy in place dealing with issues related to the prevention and management of workplace accidents, as these issues are governed by legislation, adhered to by the Bank. In accordance with current practice, both Bank Millennium and the other Group's companies determine the circumstances and causes of workplace accidents and apply appropriate measures to prevent such accidents on the basis of the applicable provisions *Code* and the *Regulation of the Council of Ministers of 1 July 2009 on determining the circumstances and causes of workplace accidents*.

Bylaws of the Company Social Benefits Fund in Bank Millennium S.A.

The Bylaws lay down the principles for the creation and conditions for the use, by Bank Millennium employees, of services and benefits financed by the Company Social Benefits Fund.

Individuals entitled to use the benefits provided by the Fund are full-time and part-time Bank Millennium employees, their family members and former employees of the Bank who either retired or received a disability pension immediately after the termination of their employment relationship with the Bank. The Fund's resources are administered by the Director of the Human Resources Department, acting under the authority of the Bank's Management Board.

As the parent entity, the Bank serves as the central body responsible for developing the rules governing the employee area across the Group. *The Bylaws of the Company Social Benefits Fund in Bank Millennium S.A.* serve as a reference point for the other Group companies. Each company within the Bank Millennium Group is a separate employer and has its own regulations implemented on the basis of the Bank's regulations. These documents may be adopted either in a form consistent with the original or adjusted to the specific nature of the company's operations. This approach ensures consistent standards across the Group while maintaining formal compliance with the requirements arising from the separate employer status of each company.

Personal Data Security Policy in Bank Millennium S.A.

The Bank has in place the *Personal Data Security Policy in Bank Millennium S.A.*, which describes the general rules regarding the protection of data processed by the Bank. The purpose of the policy is to define the rules for processing personal data in compliance with the requirements of the applicable legal regulations in this respect. The Policy applies to all Bank Millennium employees.

The Bank's Management Board is responsible for approving and amending the *Personal Data Security Policy*. The Data Protection Department is in charge of supervising the implementation of the *Policy*.

Information on the processing of personal data in Bank Millennium S.A.

The document contains detailed information on the purposes and duration of the employer's processing of employees' personal data, the categories of entities that have access to personal data and the rights of employees related to the processing of their personal data. The scope of the information provided corresponds to the requirements under EU data protection legislation, i.e. *Regulation (EU) 2016/679 of the European Parliament and of the Council*. Supervision over the proper processing of personal data is exercised by the Data Protection Officer.

17.1.4 Procedures for cooperation with own workforce and employee representatives regarding impacts

[S1-2] In implementing the provisions of the *Code of Ethics*, the Bank Millennium Group regularly surveys employee opinions and conducts extensive communication and dialogue with employees.

Employee satisfaction survey

An employee satisfaction survey is carried out once a year in the form of a questionnaire, in which employees evaluate various aspects of operation of the Bank and the work environment. The purpose of the survey is to understand how employees perceive their work experience, identify areas that require improvement and implement improvement activities.

Starting in 2025, the satisfaction surveys were expanded to cover the entire Bank Millennium Group, enabling the systematic monitoring of employee needs across all subsidiaries and ensuring a consistent approach to human capital management.

The Bank's unit responsible for implementing this process and reporting the results to the Management Board is the Human Resources Department, in particular the Director of the Human Resources Department who heads it. The Human Resources Department remains under direct oversight of the President of the Management Board.

The survey covers various aspects of work, such as terms and conditions of employment, relationships with superiors and co-workers, work organisation, professional development opportunities, compensation, job stress level and other factors that affect overall employee satisfaction. The questionnaire also offers the possibility of giving comments, both positive and critical. In the most recent edition, the positive comments outnumbered negative ones.

Participation in the survey is voluntary and responses are anonymous in order to provide respondents with the comfort and freedom to express their opinions. The survey and review of its outcomes are conducted through an external company.

Employees receive information about general outcomes of the survey in the World of Millennium Intranet site, while detailed results are discussed at managers' meetings and within departmental team meetings.

In 2025, 73% employees participated in the survey, which confirms high employee engagement in the organisation's improvement process. In contrast, 63% employees participated in the survey in 2024.

Year-on-year growth in participation reflects increasing willingness on the part of employees to share feedback and the organisation's greater openness to dialogue.

Employee needs and expectations identified in the survey resulted in a number of key initiatives for 2025:

- Doubling employer contributions to PPK for employees with tenure of at least 5 years,
- Implementing the HiAi AI knowledge hub to support education on new technologies,
- Introducing the Mindgram well-being platform for psychological support, coaching, and soft skills development,
- Simplifying internal processes and procedures,

- Improving communication and adopting netiquette guidelines for meetings.

Meetings between employees and the Management Board

The Management Board places strong emphasis on communication and dialogue with the employees of the Bank Millennium Group. Regular meetings are organised primarily within Bank Millennium, with the participation of representatives of the Group's companies. These include among others:

- **Area-specific meetings** – Retail Banking, Corporate Banking, IT Department, covering results, summaries, development plans, new solutions, case studies, and awards granted to employees.
- **Annual Bank Management Staff Meeting** – once year, a meeting is held to present long-term visions, ideas, debates, and to recognise employees with the greatest impact on projects and internal and external bank solutions during the year.
- **Meetings of Management Board Members with their Departments** – after every announcement of quarterly results, Management Board Members organize meetings with their departments when they present financial and business performance and discuss key HR initiatives and achievements.

Communication with employees

Bank Millennium Group consistently promotes open communication, making sure that employees have constant access to information on its operations, current projects, and employee initiatives. Internal communication tools, such as Intranet platforms and regular employee engagement activities, serve a key role in this area:

- **World of Millennium** - is an Intranet communication platform regularly publishing articles to inform employees on current events in the Bank, including external events featuring our experts, internal events organized for the Bank's staff, or summaries of activities by respective teams, departments and areas, presented in the form of articles, podcasts or video materials. It also provides ongoing information on new solutions for customers, how they are promoted, and on progress in the implementation of the Bank's key projects and strategic undertakings.
- **Employee Zone** - the HR Department additionally operates a dedicated Employee Zone Intranet page publishing news on employee matters, benefits, procedures, and HR documents
- **360° Survey** - to enable unit heads and Management Board members to obtain reliable feedback, the Bank conducts anonymous **360° Surveys**. This tool supports reflection on management styles and leadership growth directions.
- **Employee Volunteerism** - our annual **Our People** initiative, combining sports challenges with charitable activities, is an important element of employee communication and integration. During the first part of the initiative – a sports challenge – employees of the Bank Millennium Group collect points for volunteering by engaging in various types of physical activity. After this stage is completed, Bank Millennium transfers funds to the Bank Millennium Foundation, and these funds enable the implementation of original volunteer projects that support local communities. In 2025, information sessions about the volunteering programme were held at three Bank headquarters: Warsaw, Gdańsk and Wrocław. In 2025, more than 300 employee volunteers participated in the initiative, delivering 54 projects across 45 locations in Poland. For comparison, in 2024, 200 volunteers carried out 49 projects in 35 locations nationwide.

Cooperation with trade unions

In accordance with the provisions of the *Human Rights Policy* implemented in the Bank Millennium Group, we respect the freedom of association and comply with the rules that permit employees to associate, and we create conditions for employee organisations, including trade unions, to operate in accordance with applicable laws.

Three trade union organisations operate in Bank Millennium. Millennium Leasing has one trade union organisation. There are no trade unions in other Group companies.

Bank Millennium employees and those of Bank Millennium Group companies are not covered by a collective bargaining agreement (collective bargaining coverage is 0%), so 100% of employees are represented by trade unions.

The Bank, in accordance with the applicable laws, cooperates with the trade unions within the scope defined by the *Labour Law* and the *Trade Unions Act of 23 May 1991*. Under the agreements in place, the Bank and the trade unions agrees on internal regulations relevant to employees, such as

remuneration regulations, bonus regulations, remote work regulations and the social fund spending plan. The Bank also consults with the trade unions on case-by-case employee issues. The HR Department is responsible for cooperation with the trade unions.

The Bank provides employees with information on changes regarding relations with it as an employer, taking into account the criterion of relevance, with the advance notice specified by labour legislation, that is a minimum of 30 days.

17.2 Workforce characteristics

17.2.1 Characteristics of the undertaking's employees

[S1-6] The Bank Millennium Group conducts its activity in the Republic of Poland and does not have any other locations relevant to its business activity. Therefore, all employee disclosures refer to Poland only.

At the end of 2025, the headcount in the Bank Millennium Group was 7,023 people, compared to 6,836 at the end of 2024. In both years, the majority of employees were women – 64% in 2025 and 65% in 2024. The average age of employees remained stable at 40 years in both periods presented.

In the Bank Millennium Group, we did not experience any significant fluctuations in the number of employees between the reporting periods. The Group does not employ workers on non-guaranteed hours.

Workforce characteristics in the Bank Millennium Group and Bank Millennium - breakdown by gender¹³

Gender	Headcount	FTE	Headcount	FTE
	Group		Bank	
Males				
2025	2,510	2,467	2,362	2,354
2024	2,419	2,373	2,269	2,260
Females				
2025	4,513	4,439	4,283	4,267
2024	4,417	4,341	4,206	4,190
Other				
2025	0	0	0	0
2024	0	0	0	0
Not reported				
2025	0	0	0	0
2024	0	0	0	0
Total employees				
2025	7,023	6,906	6,645	6,621
2024	6,836	6,714	6,475	6,450

¹³ Includes the Group's employees working under an employment relationship (fixed-term and indefinite-term contracts, substitutions) as at 31 December 2025. Data are provided for the Group in total and for the Bank individually, in people, as well as in full-time equivalents (FTEs) – for instance, if an employee is employed 50% of the time equivalent to a full-time employment contract, we report 0.5 FTEs. The number of employees shown in this report is equal to the number of employees shown in the Management Board Report on the activity of Bank Millennium and the Bank Millennium Group for 2025.

Characteristics of Bank Millennium Group employees – breakdown by form of employment and working hours¹⁴

Headcount	Females	Males	Other	Not reported	Total
Number of employees					
2025	4,513	2,510	0	0	7,023
2024	4,417	2,419	0	0	6,836
Number of employees on indefinite-term contracts					
2025	3,943	2,140	0	0	6,083
2024	3,930	2,080	0	0	6,010
Number of temporary employees					
2025	570	370	0	0	940
2024	487	339	0	0	826
Number of non-guaranteed hours employees					
2025	0	0	0	0	0
2024	0	0	0	0	0
Number of full-time employees					
2025	4,392	2,458	0	0	6,850
2024	4,285	2,362	0	0	6,647
Number of part-time employees					
2025	121	52	0	0	173
2024	132	57	0	0	189

¹⁴ Includes the Group's employees working under an employment relationship (fixed-term and indefinite-term contracts, substitutions) as at 31 December 2025. Data are provided for the Group in total and for the Bank individually, in people, as well as in full-time equivalents (FTEs) – for instance, if an employee is employed 50% of the time equivalent to a full-time employment contract, we report 0.5 FTEs. The number of employees shown in this report is equal to the number of employees shown in the Management Board Report on the activity of Bank Millennium and the Bank Millennium Group for 2025.

Characteristics of Bank Millennium employees – breakdown by form of employment and working hours¹⁵

Headcount	Females	Males	Other	Not reported	Total
Number of employees					
2025	4,283	2,362	0	0	6,645
2024	4,206	2,269	0	0	6,475
Number of employees on indefinite-term contracts					
2025	3,733	2,002	0	0	5,735
2024	3,726	1,943	0	0	5,669
Number of temporary employees					
2025	550	360	0	0	910
2024	480	326	0	0	806
Number of non-guaranteed hours employees					
2025	0	0	0	0	0
2024	0	0	0	0	0
Number of full-time employees					
2025	4,227	2,348	0	0	6,575
2024	4,141	2,253	0	0	6,394
Number of part-time employees					
2025	56	14	0	0	70
2024	65	16	0	0	81

¹⁵ Includes the Bank's employees working under an employment relationship (fixed-term and indefinite-term contracts, substitutions) as at 31 December 2025. Data are provided for the Group in total and for the Bank individually, in people, as well as in full-time equivalents (FTEs) – for instance, if an employee is employed 50% of the time equivalent to a full-time employment contract, we report 0.5 FTEs. The number of employees shown in this report is equal to the number of employees shown in the Management Board Report on the Activity of Bank Millennium and the Bank Millennium Group for 2025.

Employee turnover in the Bank Millennium Group and Bank Millennium¹⁶

Headcount	Headcount	FTE	Headcount	FTE
	Group		Bank	
Number of total employees who left the entity				
2025	1,013	1,000.4	987	982.8
2024	1,034	1,016.3	982	979.8
Employee initiative				
2025	614	610.3	598	597.1
2024	558	555.7	533	531.8
Mutual agreement				
2025	86	81.1	78	77.7
2024	106	93.2	92	91.6
Dismissal				
2025	275	272.1	274	271.1
2024	336	335.5	326	325.8
Retirement				
2025	31	31.0	31	31.0
2024	30	28.6	28	27.6
Death				
2025	7	6.0	6	6.0
2024	4	3.3	3	3.0
Employee turnover rate				
2025	14.4%	14.5%	14.9%	14.8%
2024	15.1%	15.1%	15.2%	15.2%

17.2.2 Characteristics of non-employees in own workforce

[S1-7] As at 31 December 2025, the Bank Millennium Group cooperated with 1,685 people that were non-employees. This group includes 609 contract employees providing highly specialized IT services in the Group's development projects. The vast majority of the remainder are franchisee employees bound by an employment relationship with the Bank as a Natural Person Providing Agency Services (NPPAS) - 858 individuals.

In the previous year, i.e. as at 31 December 2024, the Bank Millennium Group cooperated with 1,567 non-employees, of which 508 were contract employees and 850 - franchisee employees working as NPPASs.

¹⁶ The employee turnover rate (for employees remaining in employment relationship), at the consolidated level (for the Group), is calculated as the ratio of the number of employees (full-time equivalents) who left during the reporting period voluntarily, due to dismissal, retirement, or death at work (excluding transfers of employees between Group companies) to the number of employees (full-time equivalents) remaining in employment at the end of the reporting period.

The structure and scope of cooperation in this group are similar in both years, while the observed differences in numbers reflect the Bank Millennium Group current operating and organisational needs.

Characteristics of non-employee workers of the Bank Millennium Group - breakdown by type of employment contract¹⁷

Headcount	Females	Males	Other	Not reported	Total
Number of non-employees					
2025	972	713	0	0	1,685
2024	953	614	0	0	1,567
Mandate contracts, contracts for specific work, civil law agreements for the Supervisory Board, trust contracts, agreements based on the resolution					
2025	75	143	0	0	218
2024	74	135	0	0	209
NPPAS mandate contracts					
2025	754	104	0	0	858
2024	741	109	0	0	850
B2B					
2025	126	297	0	0	423
2024	118	247	0	0	365
Outsourcers					
2025	17	169	0	0	186
2024	20	123	0	0	143

¹⁷ Data are provided for the Group in total and for the Bank individually, in headcount.

Characteristics of non-employee workers of Bank Millennium - breakdown by type of employment contract¹⁸

Headcount	Females	Males	Other	Not reported	Total
Number of non-employees					
2025	838	405	0	0	1,243
2024	828	354	0	0	1,182
Mandate contracts, contracts for specific work, civil law agreements for the Supervisory Board, trust contracts, agreements based on the resolution					
2025	67	132	0	0	199
2024	67	122	0	0	189
NPPAS mandate contracts					
2025	754	104	0	0	858
2024	741	109	0	0	850
B2B					
2025	0	0	0	0	0
2024	0	0	0	0	0
Outsourcers					
2025	17	169	0	0	186
2024	20	123	0	0	143

17.3 Employment security, friendly place to work

17.3.1 Policies related to employment security

[S1-1] Within the Bank Millennium Group, the primary document defining employees' rights and obligations, as well as the rules concerning workplace safety and organisation, is *the Work Regulations*, developed by Bank Millennium. It serves as the basis for implementing analogous regulations in the individual Group companies. Detailed information on the Group's approach to employee-related regulations can be found in section 17.1 *Workforce strategy*.

17.3.2 Actions taken to implement policy objectives

[S1-4] The Bank Millennium Group operates in Poland, where employment conditions and practices are strictly regulated by law. All employees (except for non-employees in own workforce) work under employment contracts and enjoy guaranteed working hours. The employment model provides employees with a sense of job security and predictability of working conditions.

The Group's employment structure consists mainly of full-time and indefinite-term contracts. Employment is predominantly local – employees are individuals working in Poland and holding Polish citizenship.

Percentage of full-time employees:

- 98% in 2025
- 97% in 2024

¹⁸ Data are provided for the Group in total and for the Bank individually, in headcount.

Percentage of employees on indefinite-term contracts:

- 87% in 2025
- 88% in 2024

Percentage of employees working locally (Polish citizens working in Poland):

- 99% both in 2024 and in 2025.

The Bank Millennium Group recognizes employment security and stability as key elements of responsible and sustainable human resources management. Our approach is based on two pillars: adherence to the *Labour Code* as the supreme external document governing the rights and obligations of the employer and employees, and internal regulations designed to ensure the highest standards of safety, ethics and social responsibility.

The Bank Millennium Group surveys employee opinions and conducts extensive communication and dialogue with employees. The purpose of the survey is to understand how employees evaluate their work experience, thus enabling the Bank to identify areas for improvement and make appropriate changes within the organisation. These activities are described in more detail in section *17.1 Workforce strategy*.

We promote conditions aimed at ensuring a balance between professional career and personal life as well as other personal needs of our employees. Creating a friendly workplace that fosters work-life balance is not only a key sustainability element, but also a major factor contributing to employee productivity, commitment and loyalty.

The Bank Millennium Group permits its employees to customize their form and working hours by offering various systems, such as fixed, shift-based, task-based or equivalent, as well as work under a hybrid model. For more information, see section *17.5. Working time*.

In addition to providing attractive working conditions, development and social support, Bank Millennium supports employees returning to work after a maternity/parental leave, and encourages participation in charitable activities, employee volunteerism, sports and cultural activities.

The Bank operates a dedicated Intranet space called “Me Zone”, available to all employees, offering extensive access to webinars on health, stress reduction techniques, diversity, and well-being. In 2025, we expanded these initiatives by implementing the Mindgram platform, which significantly enhanced psychological support and personal development opportunities. Mindgram provides access to webinars, individual psychotherapy and coaching sessions, and online expert advice, enabling employees to access professional help flexibly. This creates a comprehensive ecosystem supporting the health, balance, and skill development of all Group’s employees.

Through these solutions, employees have access to professional online support, addressing their well-being needs. The platform also supports the development of soft and professional skills through coaching, expert sessions, and educational materials on effective leadership, career management, and mental resilience.

Employee volunteering

Employee volunteering remains a key element of our organisational culture. In 2025, we concluded the *Our People’25* programme, during which volunteers completed a record 54 projects addressing local community needs in the areas of:

- Education and development - workshops for children, youth, and seniors; integration projects; environmental and financial education,
- Ecology and environment - cleaning green areas, creating green corners, modernizing nature facilities,
- Aid for those in need - support for hospices, care homes, foster families, and people with disabilities,
- Animal care - initiatives for shelters and improving animal living conditions,
- Safety and health - first aid training, AED equipment purchases, healthy lifestyle workshops.

The *Our People’25* sports-charity campaign engaged nearly 1,800 employees, and thanks to their activity, the Bank allocated PLN 250,000 for volunteering implementation and promotion. Such broad participation in initiatives strengthens team integration, sense of purpose, and social responsibility, while building an organisational culture based on engagement and collaboration.

Social protection

[S1-11] The Bank Millennium Group operates under the provisions of the *Labour Code*, which guarantees, without limitation, protection to all employees against loss of income due to serious life emergencies, such as illness, unemployment, work accident, acquired disability, parental leave and retirement.

All Bank Millennium Group employees are offered the same social and financial benefits regardless of the type of employment contract (for a definite/indefinite term), working time (part-time/full-time) or the place of work:

- Support activities for employees approaching retirement/post-retirement

Approximately 17% of Bank Millennium Group employees are over the age of 50, compared to about 16% in 2024. Retired employees may continue private medical care after termination of employment on preferential terms and may apply for an allowance in challenging financial or health situations. In the event of retirement, the retirement severance payment granted to the employee is dependent on their length of service. Its amount, both in 2025 and in 2024, is greater than the minimum amounts set forth in the *Labour Code*.

Social benefits

The amount and scope of benefits depend on the employee's life and financial situation. The *Bylaws of the Company Social Benefit Fund* regulate the Bank's social activity. According to the Bylaws, the Bank pursues the following initiatives:

- conducting leisure, cultural, sporting, recreational and tourist activity,
- organising events and group meetings,
- providing material or financial assistance,
- providing financial assistance in individual events of chance, a particularly difficult financial, family or life situation (financial assistance that does not have to be repaid), also in states of emergency or epidemiological risks. The benefit may also be used by employees who retired or received a disability pension immediately after the cessation of their employment relationship.

The Bank Millennium Group provides employees with access to a private medical care programme throughout Poland. Under individually prepared ranges of medical subscriptions, Employees may have access to basic and specialist medical consultations, detailed diagnostic tests and prevention programmes. Medical subscriptions on preferential terms may also be used by family members of a current or retiring employee.

For employees who want additional financial security for unforeseen life situations, we offer an extensive life insurance programme. Life insurance constitutes a cornerstone of financial security. Owing to extremely favourable agreement with Poland's largest insurer, employees may join a group insurance programme and benefit from terms they would not be able to obtain if they insured themselves individually. Joining the insurance is voluntary. The protection covers the life and health of the employee and their family members.

17.3.3 Objectives related to the pursuit of policies and activities

[S1-5] In its *Bank Millennium and Group's Strategy for 2025-2028 "Strategy 2028 – Value and Growth"* (*Strategy 2028*), Bank Millennium has established the goal of maintaining a competitive, transparent and compliant employee compensation policy and enhancing the Bank's attractiveness as a place to work, among others by reducing staff turnover and maintaining its position as a Top Employer.

The *Top Employer Certificate* is awarded by the Top Employers Institute, an international organisation specializing in researching, assessing, and certifying HR practices. The Institute has been operating since 1991 and has its headquarters in Amsterdam (Netherlands). Bank Millennium holds Top Employer certificates for 2024, 2025, and 2026, which confirms its high standards in human resources management. We are Top Employer laureates for the third time.

Implementation of strategic sustainable development initiatives is monitored quarterly by the Sustainability Committee, which collects data and reports from units responsible for implementing the respective initiatives. Managers of these units report progress on targets in their areas, and results are discussed at Committee meetings.

This monitoring model, based on cyclical reviews and inter-unit collaboration, will be maintained throughout the *Strategy 2028* period.

Targets established in the *Strategy 2028* were developed in collaboration with responsible units, which ensures that they are operationally feasible and aligned with the organisation's needs.

The described actions and targets reflect the materiality analysis-identified opportunity: Training and skills development, which enhances the Bank's attractiveness as an employer, supports retention, and builds a culture of social responsibility in line with *Strategy 2028*.

The above strategic objectives do not constitute targets within the meaning of the ESRS (MDRT).

17.3.4 Work-life balance metrics

[S1-15] Bank Millennium Group employees entitled to family-related leave and those who have used it¹⁹

	Females	Males	Other	Not reported	Total
Employees entitled to family-related leave					
2025	4 513	2 510	0	0	7 023
2024 ²⁰	4 417	2 419	0	0	6 836
Employees who took family-related leave					
2025	1 648	532	0	0	2 180
2024	1 669	492	0	0	2 161
Percentage of employees who used family-related leave					
2025	37%	21%	0%	0%	31%
2024	38%	20%	0%	0%	32%

¹⁹ Family-related leave: maternity, parental or paternity leave; childcare leave under Article 188 of the Labour Code; and care leave granted to provide personal care or support to a family member or a person living in the same household (5 days).

²⁰ Differences in the reported values between 2024 and 2025 result from a change in the methodology for calculating the S1-15 indicator, consisting in moving away from defining the group of 'eligible' employees based on detailed categories of family-related leave and adopting, in 2025, a simpler approach (in accordance with the Labour Code), in which the numerator includes employees who used family-related leave (if an employee used two categories of leave in the current year, they are counted only once), while the denominator covers all employees in an employment relationship at the end of the reporting period.

Bank Millennium employees entitled to family-related leave and those who have used it²¹

	Females	Males	Other	Not reported	Total
Employees entitled to family-related leave					
2025	4 283	2 362	0	0	6 645
2024 ²²	4 206	2 269	0	0	6 475
Employees who took family-related leave					
2025	1 595	4 97	0	0	2 092
2024	1 614	466	0	0	2 080
Percentage of employees who used family-related leave					
2025	37%	21%	0%	0%	31%
2024	38%	21%	0%	0%	32%

Employees who used family-related leave:

- Employees who, during the reporting period, completed maternity, parental or paternity leave.
- Employees who, during the reporting period, used childcare leave under Article 188 of the Labour Code or submitted an application for such leave.
- Employees who, during the reporting period, used at least one day of care leave granted to provide personal care or support to a family member or to a person living in the same household.

The percentage of employees who used family-related leave is expressed as the ratio of the number of employees who used family-related leave to the number of employees in an employment relationship at the end of the reporting period.

17.4 Adequate compensation

17.4.1 Policies related to employee compensation

[S1-1] The Bank Millennium Group has in place a uniform *Compensation policy for employees of the Bank Millennium Group* which articulates the assumptions used to shape the fixed and variable components of compensation for all employees in the Group while taking into account the tasks and

²¹ Family-related leave: maternity, parental or paternity leave; childcare leave under Article 188 of the Labour Code; and care leave granted to provide personal care or support to a family member or a person living in the same household (5 days).

²² Differences in the reported values between 2024 and 2025 result from a change in the methodology for calculating the S1-15 indicator, consisting in moving away from defining the group of 'eligible' employees based on detailed categories of family-related leave and adopting, in 2025, a simpler approach (in accordance with the Labour Code), in which the numerator includes employees who used family-related leave (if an employee used two categories of leave in the current year, they are counted only once), while the denominator covers all employees in an employment relationship at the end of the reporting period.

degrees of power assigned to the teams and units concerned. Policies pertaining to the employee compensation area are described in more detail in section *17.1 Workforce strategy*.

17.4.2 Actions taken to implement policy objectives

[S1-4] Employees have employment contracts and fixed compensation makes up a major part of their overall compensation.

Our internal regulations are aimed at ensuring transparency, fairness and competitiveness in compensation. We set clear criteria defining the rules for determining employee compensation, bonuses and fringe benefits, enabling us to motivate our employees, build commitment and support their professional development. Bank Millennium's employee compensation system is aligned with sustainability principles – we strive to maintain gender balance and counteracts inequalities in the area of compensation.

At the Group, regular salary and position reviews are conducted. Pursuant to an assessment of the Group's financial condition and its business environment, the Bank's Management Board may make a decision to award a pool of funds to be used to modify employees' base salaries.

In accordance with the *Employee Compensation Policy*, the Bank incorporates information in the compensation policy concerning the market levels of compensation for similar positions. Employee compensation is periodically checked on the basis of the Bank's current strategy, market data, job performance assessments and employee career stages.

Moreover, in the Bank Millennium Group, we use variable employee compensation as an additional motivational element of the overall compensation, shaped using differentiated bonus schemes whose purpose is to motivate employees to achieve their business and organisational plans.

The bonus systems and periodic evaluation criteria in the Bank Millennium Group have been adapted to the specific nature of work performed by employees in the Group's various areas. The rules for granting bonuses are defined for individual employee groups in the Rules and regulations of performance assessment and conditions for granting bonuses.

We do our best for the motivation mechanisms addressed to the employees of sales units and other units involved in processes related to client service to be devised in such a way that they do not lead to a conflict of interest or incentives that may incline Group employees to place their own interests or the firm's interest first thereby creating a prospective loss for any Group client. The bonus pool amount depends each time on overall results and on the general condition of the Bank.

The Trade Unions active in Bank Millennium and Millennium Leasing provide consultation of any changes that are introduced to the rules governing basic salary and to bonus systems.

External consultants are not directly involved in the process to determine compensation levels; however, the Bank does analyse data from compensation reports provided by consultants from Korn Ferry.

17.4.3 Objectives related to the pursuit of policies and activities

[S1-5] In its *Strategy 2028*, the objective of maintaining a competitive, transparent and compliant employee compensation policy (for details, see section *17.1. Workforce strategy*).

Implementation of strategic sustainable development initiatives is monitored quarterly by the Sustainability Committee, which collects data and reports from units responsible for implementing the respective initiatives. Managers of these units report progress on targets in their areas, and results are discussed at Committee meetings.

This monitoring model, based on cyclical reviews and inter-unit collaboration, will be maintained throughout the *Strategy 2028* period.

Targets established in the *Strategy 2028* were developed in collaboration with responsible units, which ensures that they are operationally feasible and aligned with the organisation's needs.

The above strategic objectives do not constitute targets within the meaning of the ESRS (MDRT).

17.4.4 Adequate wages

[S1-10] All the Bank Millennium Group employees receive compensation adequate to the nature of their work. Salary levels are reviewed taking into account the periodic assessment of performance and skills and are compared with salary information presented in salary studies on the financial markets.

The ratio²³ of remuneration of entry-level employees to the minimum wage was:

- 1.26 in 2025
- 1.33 in 2024

17.4.5 Compensation metrics

[S1-16] The ratio of the increase in total annual remuneration for 2025 of the highest-paid individual in the organisation to the median increase in total annual remuneration for all employees (excluding the highest-paid individual) is 39, while in 2024 this ratio was 38.

Gender pay gap in the Bank Millennium Group²⁴

Average unadjusted pay gap between men and women	2025: 27,98%	The gender pay gap has been calculated as the difference between the average annual remuneration paid to men and women, expressed as a percentage of the average remuneration of men within the Capital Group. Remuneration of employees working part-time has been converted to a full-time equivalent.
	2024: 30,24%	
Adjusted gender pay gap between women and men	2025: 3,20%	The adjusted gender pay gap has been determined as the weighted average difference in remuneration between women and men across individual job grading levels, taking into account job families and the size of employee groups.
	2024: 6,69%	

The pay gap indicator is used not only for sustainability reporting but also reported to other authorities (PFSA, EBA). To ensure reporting consistency, we adopted a different calculation method – converting total remuneration to full-time equivalent using monthly rather than hourly rates. Total remuneration includes both fixed and variable components: base salary from contract, bonuses, awards, overtime, severance, holiday equivalents, non-cash benefits added to income (i.e., all PIT-taxable components). The unadjusted gap considers all employees at year-end and their total remuneration.

The difference in the average compensation of women and men does not include the differences in geographic location, scope of duties and headcount structure of men and women in various positions in different areas of the Bank. It should be emphasised that the last factor in particular is of major significance for the shaping of the average employee compensation. In 2025, women constituted the majority of employees in the sales network (73%), a level similar to 2024, when their share was 74%. Men, in both years, predominated in high-technology areas.

The Bank reviews in detail all factors that may contribute to the differences in employee compensation between men and women.

²³ The indicator is calculated as the ratio of the average remuneration of lowest-level employees (employed on a full-time basis) to the statutory minimum wage in the Polish economy applicable in 2024 and 2025, respectively.

²⁴ The unadjusted gender pay gap between women and men is presented as the difference between the average remuneration of men and the average remuneration of women, expressed as a percentage of the average remuneration of men, based on the employment structure as at 31 December 2025. The indicator has been calculated in accordance with the recommendations of the Polish Bank Association regarding the reporting of gender pay differences, including population exclusions and the remuneration components taken into account. The indicator is calculated based on total remuneration (annualised and converted to a full-time equivalent), excluding overtime pay and allowances as well as employer social cost contributions. The Bank also calculates the adjusted gender pay gap, determined as the weighted average for employee subgroups, taking into account job grading levels and job families. This indicator is likewise calculated based on total remuneration. The difference in the value reported for 2024 results from a change in the calculation methodology – the 2024 value has now been recalculated using the method adopted in 2025.

17.5 Working time

17.5.1 Policies related to working time

[S1-1] Within the Bank Millennium Group, the primary document that defines employees' rights and obligations, as well as the rules governing workplace safety and organisation, is the Work Rules and Regulations, developed by Bank Millennium. It serves as the basis for implementing analogous regulations in the individual Group companies.

The document is described in more detail in section 17.1 *Workforce strategy*.

17.5.2 Actions taken to implement policy objectives

[S1-4] Fixed full-time working hours

98% of the Bank Millennium Group's employees work full-time, predominantly according to a schedule of fixed working hours. Individual work schedules and remote work are permissible on the basis of individual contracts. For comparison, in 2024 the percentage of full-time employees was 97%.

Bank Millennium Group employees are subject to one of the following working hour schedules: fixed (the main one), shift-based, task-based, balanced, continuous. The selection of a system depends on the type, organisation and place of work and the business requirements in a specific area.

Individual approach to the form and time of work

In response to an employee's written request, their superior may set an individual work time schedule within the framework of the system applicable to that employee. Working remotely is also possible through individual arrangements. Employees may work part-time insofar as the conditions for the Group to operate in a given area facilitate that. Many employees with parental rights are taking advantage of this solution.

Work in a hybrid mode

A hybrid work system has been introduced in the Bank Millennium Group. The Bank recommends that employees work 50% of time in the office and 50% on a remote basis, with the organisational unit Managers being authorized to modify these proportions as the needs require in connection with the tasks and projects in progress and the effectiveness achieved by employee teams. Such a solution makes it possible to combine the needs of the employees with the interest of the employer.

Overtime management

In the Bank Millennium Group, overtime is managed through the TETA system, which is available to all employees. Registration of overtime during the reporting period is carried out in accordance with the Polish labour law. Employees are familiarized with the rules for registering and receiving overtime through the HR Portal on the Intranet.

We make every effort to ensure that employees have full knowledge of working time rules, applicable laws and internal regulations. To this end, we arrange time management training courses that are tailored to different groups of employees. The topics covered during such training include:

- *Labour Code* regulations on working time, including working time standards and dimensions, overtime and days off
- Internal regulations – such as procedures for reporting overtime and vacation planning rules,
- effective work time management – techniques for planning and organizing tasks to increase efficiency and minimize stress associated with excessive duties.

Training-related issues in Bank Millennium are described in more detail in section 17.8 *Training and development*.

17.5.3 Objectives related to the pursuit of policies and activities

[S1-5] The Bank Millennium Group strives to create a friendly work environment that takes into account the various needs of employees also in terms of their working hours, while remaining in compliance with the *Labour Code* and the *Work Rules and Regulations* in force within the Group's companies. The following are the main goals we pursue to manage our employees' working time in a transparent and effective manner:

1. **Compliance with the law** – We ensure compliance with standards for working hours, rest periods and overtime compensation rules.
2. **Flexible working time** – We apply a flexible approach to working time organisation based on a hybrid work model and the provisions of the Labour Code regarding individual working hours, which allows employees to better adjust their working schedule to their needs.
3. **Compliance with working time rules** – We monitor and optimize working time to ensure employees get adequate rest and to prevent excessive workload.
4. **Developing a culture of responsible work** – management is encouraged to promote transparency and support the individual needs of employees in the organisation of their working time as part of building trust and long-term commitment of the team.

Monitoring the achievement of individual goals is supported by dedicated tools available to all employees, enabling their measurability and effectiveness: working time and leave management system, and the HR portal to report problems or questions related to the HR area.

17.6 Employee health and safety

17.6.1 Policies related to employee health and safety

[S1-1] Within the Bank Millennium Group, all companies, as separate employers, ensure safe and hygienic working conditions for their employees by fulfilling the obligations arising from labour law and occupational health and safety regulations. OHS activities include both the prevention of occupational risks and initiatives supporting employees' physical and mental wellbeing. At Bank Millennium, the key document governing the principles of occupational health and safety management is the Occupational Health and Safety and Fire Protection Management Instruction, which defines, among others:

- responsibilities of the employer and employees with respect to occupational health and safety and fire protection,
- organisation of occupational health and safety and first aid training,
- rules governing inspections of workplace conditions and risk management,
- principles of consultation with employee representatives.

The document is described in more detail in section *17.1 Workforce strategy*.

17.6.2 Actions taken to implement policy objectives

[S1-4] The Group's main activity in ensuring the health and safety of its employees is the continuous provision of proper occupational health and safety conditions. The Bank systematically addresses this area through both prevention and crisis support. Key initiatives implemented in 2025 include:

1. **OHS audits and inspections** – every unit undergoes independent OHS audits on a two-year cycle, ensuring coverage of the organisation in this period. In practice, this means that the audit covers 40% to 60% of units annually, depending on network changes (e.g., new branches, restructurings). Between audits, ongoing internal oversight is conducted via the *MSERV* application for defect reporting, continuous administrative supervision, OHS service inspections, and collaboration with social labour inspectors.
2. **OHS and fire protection training** - the Bank provides mandatory orientation training for all new employees as well as periodic training as required by law. Additionally, first aid training and specialized courses for management staff are organised, to maintain a high level of safety awareness.
3. **Defect reporting system** – the *MSERV* application allows employees to report technical defects and workplace hazards promptly. The reports are forwarded instantly to relevant units, which enables quick mitigation of risks and minimization of threats to health and safety.
4. **OHS Committee and employee consultations** – Regular meetings of the OHS Committee are held at least once per quarter. During the meetings, employee and union representatives can voice their concerns about working conditions. The proposals are analysed and implemented by relevant units, while major actions are escalated to the Management Board.
5. **Post-incident support** – psychological and substantive assistance for critical events.
6. **Health promotion and prevention programmes:**
 - Me Zone – Educational platform for physical/mental health.

- New in 2025: the Mindgram app – Access to psychological consultations, content on ergonomics and healthy habits.
 - Guidelines for breaks and exercised for office workers.
 - Reimbursement for corrective glasses and specialist consultations as part of the medical package.
7. **Ongoing occupational risk assessment** – the Bank regularly updates occupational risk assessments in collaboration with employee representatives, in order to adapt protection measures to evolving working conditions.
 8. **Physical security in branches** – the Bank has been reducing cash handling in retail branches, which significantly lowers the risk of robbery and related injuries and trauma. *Physical Security and Cash Handling Instructions* have been implemented, defining the rules for keeping the branches safe. Regular security inspections are conducted, the functionality of security systems is maintained, and employees receive ongoing threat alerts through awareness-raising programmes.

17.6.3 Objectives related to the pursuit of policies and activities

[S1-5] The Bank Millennium Group goals related to ensuring occupational health and safety conditions for all employees derive directly from the Labour Code and the needs reported by employees. In order to effectively manage them, we have implemented an internal document, “*Instructions for managing occupational health and safety and fire protection*”, which is a permanent component of the Bank’s operations. The principles set out in the Instruction may be applied by the Group’s companies.

To achieve the assumptions adopted in internal OHS regulations, we strive to:

- maintain serious accident rate at 0,
- cover 100% of employees with OHS training,
- ensure occupational medicine check-ups for all,
- continuously improve risk assessment process, with updates via employee collaboration,
- promote workplace ergonomics and healthy habits via educational materials and webinars,
- Ensure employee participation in OHS activities via OHS committees, consultations with trade unions, participation of social labour inspectors in post-accident proceedings.

Targets are monitored through regular OHS inspections across all Bank units and dedicated tools (HR portal, defect reporting system), enabling measurement of the effectiveness of actions taken.

The above ambitions and directions of action do not constitute targets within the meaning of the ESRS (MDR-T).

17.6.4 Health and safety metrics

[S1-14] In the Bank Millennium Group, the occupational health and safety management system based on legal requirements or recognized standards or guidelines covers 100% of employees.

Workplace accidents in the Bank Millennium Group²⁵

Headcount	Females	Males	Other	Not reported	Total
Number of work-related injury incidents					
2025	20	7	0	0	27
2024	18	11	0	0	29
Number of days of absence related to work-related injury incidents					
2025	279	110	0	0	389
2024	354	191	0	0	545

²⁵ The number of work-related injury incidents consists of workplace accidents, accidents treated as equivalent to workplace accidents, and accidents on the way to or from work.

Headcount	Females	Males	Other	Not reported	Total
Accident rate²⁶					
2025	0.0004%	0.0003%	0	0	0.0004%
2024	0.0004%	0.0005%	0	0	0.0004%
Accident severity rate²⁷					
2025	14	16	0	0	30
2024 ²⁸	20	17	0	0	37
Number of cases of work-related ill health					
2025	0	0	0	0	0
2024	0	0	0	0	0
Number of fatal accidents					
2025	0	0	0	0	0
2024	0	0	0	0	0

Workplace accidents in Bank Millennium²⁹

Headcount	Females	Males	Other	Not reported	Total
Number of work-related injury incidents					
2025	19	7	0	0	26
2024	17	11	0	0	28
Number of days of absence related to work-related injury incidents					
2025	271	110	0	0	381
2024	315	191	0	0	506
Accident rate					
2025	0.0004%	0.0003%	0	0	0.0004%
2024	0.0004%	0.0005%	0	0	0.0004%

²⁶ A different method has been adopted for calculating the accident rate, which, in the Bank's opinion, is more transparent and clearer for the reader. According to the adopted methodology, the accident rate is the number of injured people per 1000 workers.

²⁷ Accident severity rate: this is the number of days of incapacity for work relative to the number of workplace accidents, i.e. the quotient of the number of days of incapacity for work caused by workplace accidents by the number of workplace accidents.

²⁸ The values for 2024 were adjusted as compared to those presented in the 2024 report due to the technical error during data entry. The values presented erroneously in the 2024 report: Accident severity rate in the Bank Millennium Group: Women: 39, Men: 32; Total: 71.

²⁹ The number of work-related injury incidents consists of workplace accidents, accidents treated as equivalent to workplace accidents, and accidents on the way to or from work.

Headcount	Females	Males	Other	Not reported	Total
Accident severity rate					
2025	14	16	0	0	30
2024 ³⁰	19	17	0	0	36
Number of cases of work-related ill health					
2025	0	0	0	0	0
2024	0	0	0	0	0
Number of fatal accidents					
2025	0	0	0	0	0
2024	0	0	0	0	0

17.7 Promoting diversity and equal employee compensation

17.7.1 Policies related to employee compensation and diversity

[S1-1] The Bank Millennium Group has implemented a uniform *Compensation policy for employees of the Bank Millennium Group*, which provides a formal framework for shaping the Group's employee compensation practices with respect for dignity and against discrimination.

Issues related to the gender-neutrality of employee compensation principles and the assumptions adopted in this area are described in the *Diversity Management Policy* in the Bank Millennium Group.

Additional issues related to respecting diversity in the Bank Millennium Group are also governed by the *Work Rules and Regulations*, the *Code of Ethics* and the *Human Rights Policy*.

These documents are described in more detail in section 17.1. *Workforce strategy*.

17.7.2 Actions taken to implement policy objectives

[S1-4] The Bank Millennium Group implements the principles of respecting and honouring diversity, including ensuring equal compensation for all employees through taking measures such as:

1. Clear rules on setting remuneration – they apply to all employees, regardless of their position or level of responsibility. They are based on respect for the dignity of every individual, recognition of diversity and zero tolerance for any form of discrimination.
2. The only criteria affecting employee compensation and access to specific positions involve the employee's competence and performance. Employee compensation is defined in accordance with function, progression of career and degree of achievement of established goals, promoting a 1:1 pay ratio between men and women holding comparable functions and having similar levels of responsibility and career.
3. Respecting the Human Rights Compliance Policy and the Work Rules in force within the Group's companies, under which employees are prohibited from engaging in any direct or indirect discriminatory practices against another employee.
We promote a culture of tolerance and reject all forms of discrimination based on origin, gender, sexual orientation, family situation, nationality, ethnicity, religion, membership in social groups and political beliefs, or any kind of individual physical characteristics, health conditions or disabilities.

³⁰ The values for 2024 were adjusted as compared to those presented in the 2024 report due to the technical error during data entry. The values presented erroneously in the 2024 report: Accident severity rate in Bank Millennium: Women: 39, Men: 32; Total: 71.

The right to equality applies in particular to:

- Selection criteria and conditions of employment.
 - Opportunities for professional development, access to training and opportunities to change the unit in which the employee works, including for the purposes of gaining practical experience.
 - Salary and other financial benefits, promotion to all levels of organisational hierarchy.
 - Membership in collective representation structures or in any organisation whose members practice a specific profession.
1. During employee recruitment, we do not apply criteria putting one in jeopardy of discriminatory behaviour. These rules also apply to the termination of employment, terms of employment, promotions and access to training to raise professional qualification. Candidates are selected based on objective criteria, such as in particular: education, professional experience, general and specific competences, proficiency in foreign languages and the overall match with the profile. Employees must refrain from making decisions on the basis of discriminatory criteria that will affect another person's access to a job, promotion, salary or any other work-related decision, or those that create an intimidating, hostile or humiliating work environment.
 2. Mandatory training for all the Bank Millennium Group employees on the *Code of Ethics*, which prohibits any form of discrimination. During training, managers are taught among others how to manage diverse teams. Training is an important part of developing the right attitudes – also to overcome stereotypes and promote openness to employees' various convictions and mould their own responsibility and that of their reports.
 3. Since 2018, Bank Millennium has been a signatory of the *Diversity Charter*, which is a pledge signed by organisations that choose to prohibit discrimination in the workplace and work to create and promote diversity. We have joined the *Diversity is OK* initiative, which aims to educate employees, promote mutual understanding and raise awareness of the importance of synergy within teams. The programme supports the development of competencies in effective communication and collaboration, demonstrating that diversity can create value and business benefits. We strive to ensure that every person in the organisation feels important and appreciated.

To reach a wide group of employees, we organise regular webinars, which are available live and as recordings on the Cornerstone training platform. The topics covered include, among others:

- gender equality and closing the gender pay gap,
- body positivity,
- communication in multigenerational teams,
- cooperation with people with disabilities (including disability awareness – in cooperation with the Verba Foundation),
- cross-cultural cooperation and communication with foreigners,
- the role of language in the context of diversity ("Weighing our words" – on LGBTQ+ people, the agency of language and the use of feminine forms),
- as well as "Women and men in business – the synergy effect".
- health-related topics such as menopause – how to cope with it, education on its symptoms and effects – and andropause, i.e. changes occurring in later adulthood.

The initiative is continuously developed, and its main message remains the building of an inclusive culture in which diversity is seen as an asset and every employee feels a sense of belonging and respect.

17.7.3 Objectives related to the pursuit of policies and activities

[S1-5] The *Bank Millennium and Group's Strategy for 2025-2028 "Strategy 2028 - Value and Growth"* (Strategy 2028) also includes goals related to promoting diversity, equality and inclusion in our business activities. In pursuit of the objective formulated as *Further developing compensation policies aligned with ESG and transparency standards*, the Bank will strive to ensure the highest standards required in this respect for all Group employees.

Implementation of strategic sustainable development initiatives is monitored quarterly by the Sustainability Committee, which discusses data and reports from units responsible for implementing the

respective initiatives. Managers of these units report progress on targets in their areas, and results are presented at Committee meetings.

This monitoring model, based on cyclical reviews and inter-unit collaboration, will be maintained throughout the *Strategy 2028* period.

Targets established in the *Strategy 2028* were developed in collaboration with responsible units, which ensures that they are operationally feasible and aligned with the organisation's needs.

The above strategic objectives do not constitute targets within the meaning of the ESRS (MDRT).

17.7.4 Diversity metrics

[S1-9] As the parent company, the Bank monitors diversity both at the Bank level and across the entire Bank Millennium Group. Diversity analysis is conducted based on specific indicators related to the job structure, using consistent definitions applied throughout the Group. The categories used include:

- Senior management – positions of Key Director, Senior Director and Director,
- Management staff – all other managerial positions.

Diversity data are presented both for the Bank and for the Group as a whole, enabling the monitoring of changes and trends in the overall employment structure.

Employment structure by age in Bank Millennium Group

Headcount	<30 yrs	%	30-50 yrs	%	> 50 yrs	%	Total	%
Management Board								
2025	0	0%	1	14%	6	86%	7	100%
2024	0	0%	0	0%	7	100%	7	100%
Senior management								
2025	0	0%	49	39%	78	61%	127	100%
2024	0	0%	53	46%	63	54%	116	100%
Management								
2025	26	3%	672	74%	208	23%	906	100%
2024	30	3%	687	76%	189	21%	906	100%
Other employees								
2025	1,244	21%	3,818	64%	921	15%	5,983	100%
2024	1,294	22%	3,685	63%	828	14%	5,807	100%
Total								
2025	1,270	18%	4,540	65%	1,213	17%	7,023	100%
2024	1,324	19%	4,425	65%	1,087	16%	6,836	100%

Employment structure by age in Bank Millennium

Headcount	<30 yrs	%	30-50 yrs	%	> 50 yrs	%	Total	%
Management Board								
2025	0	0%	1	14%	6	86%	7	100%
2024	0	0%	0	0%	7	100%	7	100%
Senior management								
2025	0	0%	46	42%	63	58%	109	100%
2024	0	0%	48	48%	51	52%	99	100%
Management								
2025	26	3%	631	75%	188	22%	845	100%
2024	30	4%	645	76%	169	20%	844	100%
Other employees								
2025	1,223	22%	3,617	64%	844	15%	5,684	100%
2024	1,271	23%	3,488	63%	766	14%	5,525	100%
Total								
2025	1,249	19%	4,295	65%	1,101	17%	6,645	100%
2024	1,301	20%	4,181	65%	993	15%	6,475	100%

Employment structure by gender in Bank Millennium Group

Headcount	Women	%	Men	%	Total	%
Management Board						
2025	2	29%	5	71%	7	100%
2024	0	0%	7	100%	7	100%
Senior management						
2025	40	31%	87	69%	127	100%
2024	39	34%	77	65%	116	100%
Management						
2025	525	58%	381	42%	906	100%
2024	516	57%	390	43%	906	100%
Other employees						

Headcount	Women	%	Men	%	Total	%
2025	3,946	66%	2,037	34%	5,983	100%
2024	3,862	67%	1,945	33%	5,807	100%
Total						
2025	4,513	64%	2,510	36%	7,023	100%
2024	4,417	65%	2,419	35%	6,836	100%

Employment structure by gender in Bank Millennium

Headcount	Women	%	Men	%	Total	%
Management Board						
2025	2	29%	5	71%	7	100%
2024	0	0%	7	100%	7	100%
Senior management						
2025	37	34%	72	66%	109	100%
2024	35	35%	64	65%	99	100%
Management						
2025	485	57%	360	43%	845	100%
2024	475	56%	369	44%	844	100%
Other employees						
2025	3,759	66%	1,925	34%	5,684	100%
2024	3,696	67%	1,829	33%	5,525	100%
Total						
2025	4,283	64%	2,362	36%	6,645	100%
2024	4,206	65%	2,269	35%	6,475	100%

17.8 Training and development

17.8.1 Policies related to training and development

[S1-1] Within the Bank Millennium Group, the principles of professional development and access to training are regulated at two levels. The HR Policy, which applies to the entire Group, defines the main ambitions regarding training and development as well as the actions necessary to achieve them. At the level of individual employers, the Work Rules and Regulations in each Group company regulate the organisation of work, including issues related to the possibility of participating in training.

At Bank Millennium, the detailed rules for participation in training programmes are defined by *Instructions for participation in training programmes at Bank Millennium*, which specifies the process for nominating, approving and delivering training and other development activities.

The documents form a consistent system of regulations that enables access to training, competence development and continuous learning culture.

These documents are described in more detail in section 17.1. *Workforce strategy*.

17.8.2 Actions taken to implement policy objectives

[S1-4] Training at the Bank Millennium Group is an important element of the organisation's daily activity and is treated as an investment in human capital and as the key tool supporting professional development of employees. Implement a range of initiatives aimed at ensuring the high quality, accessibility and strategic alignment of development programmes:

1. Strategic approach to development:

- Continuous improvement of training programmes in line with the latest trends and best market practices.
- Building employee engagement by investing in their professional development.
- A complementary approach to development, based on career paths, as the basis for transparent promotion criteria for Retail Network employees.
- Regular position reviews, which form the basis for promotions and are correlated with competence levels.
- Generally available training plans for Head Office employees available to all, prepared on the initiative of Unit Managers.
- Organisation of training programmes for large groups of employees, based on identified development objectives and designed in consultation with business units as regards the programme content and expected outcomes.

2. Diverse training offering:

The Group offers employees a broad range of development programmes, which include both technical training and soft skills development:

- **Onboarding for new employees** - delivered in a hybrid format combining trainer-led webinars, e-learning courses, on-the-job practice in branches and self-directed learning.
- **Millennium Campus programme** - a series of online lectures supporting innovation and creativity within the organisation. Recordings and additional materials are available on the training platform and on the *World of Millennium* Intranet.
- **Development Fridays** - a series of online lectures delivered by the Bank's experts supporting knowledge- and experience-sharing between employees. The lectures are delivered by specialists who share their knowledge and experience through lectures.
- **Development Navigator** - a catalogue of training workshops for Head Office employees focused on soft skills such as communication, collaboration and time management. The training is practical and interactive, and its scope is adjusted to current needs.
- **Change Academy** - a multi-month programme on change and project management, enriched with an AI module.
- **DORA training** - mandatory training for management board members and employees of financial institutions, delivered through e-learning and webinars.
- **Training for different groups of employees** - training is provided regularly for branch employees, the franchise network, Direct Banking, Corporate Banking, employees involved in insurance sales, Regional Directors and the Affluent Client Banking Department.

To strengthen practical managerial skills among the Bank's management staff, the Bank has been implementing the following programmes:

- **M#leaders** - leadership skills improvement programme for people in managerial roles.
- **FPL Management Masterclass** - training on building trust and engaging teams, delivered by experienced trainers.
- **Leader's Compass** - training on team management, feedback, motivation and time management.
- **Manager Certification** - training for retail branch managers focused on practical managerial skills.
- **Development training** for heads of retail branches - a training programme supporting managers in the continuation of development of their skills. Training courses on the income

model, managing a multi-generational team, managing one's use of time, and knowledge of motivators and how to recognize them.

3. Accessibility and inclusion:

- An e-learning platform that enables learning at a convenient time and place.
- Training is delivered remotely or locally.
- The form, technology, language and organisation of training is suited to the needs of different employee groups, ensuring equal access.

4. Well-being and long-term engagement:

The Bank implements programmes that support the well-being of employees across the Bank Millennium Group, focusing on work-life balance and mental and physical health:

- **Me Zone initiative** – webinars, workshops, health promoting campaigns (“Health Week”, cancer prevention), online and on-site exercise sessions, and educational materials available remotely. The topics include stress, emotions, energy management and balancing of social roles. It also includes family outings to amusement parks to promote quality time with loved ones.
- **“Diversity is OK!” Initiative** – promotes respect and openness through webinars, workshops open to all employees, manager training, quizzes and film screenings.
- **Accessibility training** – focused on serving customers with special needs.
- **Mindgram platform** – provides psychological support, psychotherapy and coaching sessions, expert consultations, themed webinars and educational materials. The platform helps to reduce stress, build mental resilience and develop soft skills. It is available to our employees from both corporate and private devices so employees can pursue development goals and address personal needs.

These initiatives strengthen long-term engagement of employees and their sense of security.

5. ESG competences:

We develop skills related to sustainable development, including sustainable finance, by providing employees with training and topical webinars such as:

- **ESG na start** - an introduction to basic ESG concepts,
- **ESG - environmental aspects** - an in-depth look at environmental issues.
- **ESG in a nutshell** - a webinar covering, among other things, an introduction to ESG, the regulatory context, sustainable products, ESG risks and issues related to greenhouse gas emissions.
- **Green Academy** - a proprietary development programme for Corporate Banking advisers (modules: ESG, public programmes, green finance, credit structuring).
- **Preventing greenwashing** - training introduced in 2025 focused on identifying and mitigating greenwashing risk.
- **Development Fridays** webinar “Climate matters: the carbon footprint in numbers and in practice”
The meeting presents key issues related to the climate impact of activities, the practical side of the carbon footprint – from data interpretation and emission calculations (scope 1, 2, 3) to examples of decarbonisation measures in the Bank and in everyday life.
- **In addition, under the UNGC partnership**, employees have access to training on sustainable development topics. The offer includes, among others, a training course on climate basics and the webinar entitled “Climate change: Challenges and opportunities for business”. Information on training available as part of the partnership is published on the Intranet so that every employee has opportunity to grow in the ESG area.

6. External development platforms:

The Bank also provides employees with access to external development tools:

- **Youniversity** - is a website providing access to the knowledge and experience of leading trainers from Poland and abroad. The platform provides unique content in the form of series

and video courses across more than 57 subject areas, supporting development in both business and private life.

- **CoachHub** - a coaching platform for key managers and regional directors in the retail and corporate networks, the programme is implemented online and features individual sessions with certified coaches to support development in selected areas and achievement of professional goals.
- **UNGC Academy** – as a member of the UN Global Compact, Bank Millennium allows employees to participate free of charge in webinars and training on sustainable development, including climate knowledge and transition challenges.
- **Empik Go** - access to e-books, audiobooks and podcasts.

17.8.3 Objectives related to the pursuit of policies and activities

[S1-5] In its activities, the Group Bank Millennium strives to improve the competences of employees, which translates into improving quality and work productivity and achieving current and future business objectives. The Group Bank Millennium's key ambitions in the training area are specified in the *HR Policy*; they include:

- **Improving qualifications:** We provide employees with access to training and development programmes that will enable them to acquire new skills and knowledge.
- **Increasing engagement:** We build employee engagement by investing in their professional development.
- **Preparing for future challenges:** We support the development of the Bank Millennium Group by preparing employees for taking more responsible roles and acquiring competencies for the future.

In *Strategy 2028*, a goal was established: Aligning the talent acquisition and development plan with the organisation's key strategic objectives, within which it set out to provide an attractive development offer for employees in strategic areas and to update the onboarding process. The Bank has also adopted the goal of continuing to build a culture of continuous learning.

The Bank Millennium Group consistently improves employee competences, which translates into improving quality and work productivity and achieving current and future business objectives, including those related to sustainability. In accordance with its internal regulations, we focus on improving competence, boosting engagement and preparing employees to future challenges.

The opportunity identified in the double materiality analysis: Training and skills development - supports the implementation of the ambitions and objectives defined in the *HR Policy* and in *Strategy 2028*. This area actually improves the Bank's ability to adapt to the changing market environment, improving talent retention and building a continuous learning culture. Accordingly, it makes it easier for the Bank to keep competitive, develop innovation and build the Bank's image as a responsible employer.

Implementation of strategic sustainable development initiatives is monitored quarterly by the Sustainability Committee, which collects data and reports from units responsible for implementing the respective initiatives. Managers of these units report progress on targets in their areas, and results are discussed at Committee meetings. This monitoring model, based on cyclical reviews and inter-unit collaboration, will be maintained throughout the *Strategy 2028* period.

Targets established in the *Strategy 2028* were developed in collaboration with responsible units, which ensures that they are operationally feasible and aligned with the organisation's needs.

The above strategic objectives do not constitute targets within the meaning of the ESRS (MDRT).

17.8.4 Training and skills development metrics

[S1-13] Employees taking part in the evaluation of the Bank Millennium Group - breakdown by gender

Percentage of active employees taking part in the assessment - breakdown by gender		Females		Males		Total	
			%		%		%
Assessed							
2025		4,061	97.67%	2,413	97.93%	6,474	97.77%
2024		3,985	98.13%	2,319	97.60%	6,304	97.93%
Not assessed							
2025		97	2.33%	51	2.07%	148	2.23%
2024		76	1.87%	57	2.40%	133	2.07%
Total							
2025		4,158	100%	2,464	100%	6,622	100%
2024		4,061	100%	2,376	100%	6,437	100%

All employees of the Bank Millennium Group are subject to periodic performance evaluations. Depending on the employee group and the nature of their responsibilities, evaluations are carried out on a monthly, quarterly or semi-annual basis. For an employee to be included in an evaluation process, they must meet the minimum tenure and working-time requirements for the period under review, as defined in internal regulations. About 98% of employees take part in these regular evaluation processes (excluding employees who do not meet the above requirements).

The Bank calculates the percentage of employees covered by performance evaluation by checking whether employees with an employment contract who worked in the last quarter of the year were evaluated for that period.

Employees on long-term leave and those who worked fewer than 15 days in the most recent quarter of the year are excluded from the evaluation process. Employees working for more than one company in the Bank Millennium Group are evaluated only by the company that is their primary place of employment.

[S1-13] Average number of training hours per employee and by gender³¹

	Females	Males	Total employees
Number of employees			
2025	4,283	2,362	6,645
2024 ³²	4,206	2,269	6,475
Number of hours			
2025	276,222	112,088	388,310
2024	236,932	105,876	342,808
Average number of hours			
2025	64,5	47,5	58,4
2024	56,3	46,7	52,9

17.9 Countering violations in the workplace

17.9.1 Policies related to countering violations

[S1-1] In the Bank Millennium Group, the use of any discriminatory practices with features of bullying or harassment in relation to employees is prohibited. The main documents that define the rights and obligations of employees and standards regarding these issues are the *Code of Ethics* and the *Work Rules and Regulations*.

The process of reporting employee-related violations in the Bank is governed by the *Procedure for dealing with reports from employees, including those suggesting bullying or discrimination in Bank Millennium S.A.* and the *Instructions for reporting breaches in Bank Millennium S.A.*, applicable in all companies of the Group.

These documents are described in more detail in section 17.1 *Workforce strategy*.

17.9.2 Actions taken to implement policy objectives

[S1-4] In order to ensure compliance with ethical principles and prevent violations, we have introduced the following activities, tools and roles:

1. **Code of Ethics** - lays down our ethical principles. Newly hired employees are required to familiarize themselves with the contents of the Code of Ethics and sign a statement of knowledge of the principles contained in the Code and their application.
2. **Ethics Officer** - the function of the Ethics Officer is exercised in the Bank by the head of the Compliance Department. The Ethics Officer's responsibilities include safeguarding compliance with the Code of Ethics by Bank employees, promoting and disseminating information about ethical standards, ordering inspections of compliance with ethical principles and verifying cases of their breach.
3. **Ethics training system** - a dedicated "Code of Ethics" e-learning course has been prepared for all employees. Every new employee is required to undergo it. Moreover, every employee is required to participate in refresher training, conducted annually.

³¹ Data relate to employees employed on permanent contracts at Bank Millennium S.A. as at 31 December 2025.

³² The differences in the reported values between 2024 and 2025 result from a change in the presentation of indicator S1-13, under which in 2025 we additionally disclose the value of the average number of training hours per employee.

4. **Communication with employees** - informing employees of all changes in the ethics area – the Code of Ethics is posted on an Intranet site accessible by all Bank employees.
5. **Breach reporting system** – upon discovery or reasonable suspicion of a breach by another employee of the law, applicable procedures or the Code of Ethics, each employee is required to promptly report such discovery to: naruszenia@Bankmillennium.pl
6. **Rules of ethics compliance monitoring system** - the Compliance Department at least annually assesses the risks associated with ethics violations in the Bank Millennium Group. A report from the assessment is drafted, which is presented to the Bank's Management Board. The Bank's Management Board periodically verifies and assesses compliance with the rules of ethics in order to adjust them to the changing internal situation within the Bank Millennium Group and its external environment, and, at least once a year, informs the Supervisory Board of Bank Millennium of the results of this assessment.

17.9.3 Objectives related to the pursuit of policies and activities

[S1-5] The Bank Millennium Group, in its relations with its employees, is guided primarily by ethical principles and acts in accordance with generally applicable laws and internal regulations. In the Bank Millennium Group Strategy for 2025-2028, we have focused, among other aspects, on caring for the well-being of our employees, including through the promotion of diversity and equality. These objectives are supported by the Group's actions to prevent all forms of discrimination against our employees, described in section 17.9.2. *Actions taken to implement policy objectives* and in section 17.9.4. *Processes for remediation of negative impacts and channels for reporting violations*.

Implementation of strategic sustainable development initiatives is monitored quarterly by the Sustainability Committee, which collects data and reports from units responsible for implementing the respective initiatives. Managers of these units report progress on targets in their areas, and results are discussed at Committee meetings.

This monitoring model, based on cyclical reviews and inter-unit collaboration, will be maintained throughout the *Strategy 2028* period.

Targets established in the *Strategy 2028* were developed in collaboration with responsible units, which aims to ensure that they are operationally feasible and aligned with the organisation's needs.

The above strategic objectives do not constitute targets within the meaning of the ESRS (MDRT).

17.9.4 Processes for remediation of negative impacts and channels for reporting violations

[S1-3] A Communication from the Director of the Human Resources Department was addressed to all Bank Millennium employees on the introduction of the *Procedure for dealing with reports from employees, including those suggesting bullying or discrimination*. The procedure specifies in detail how an employee may submit a report and how the investigation proceeds. The principles set out in the Procedure apply to all employees of the Bank Millennium Group.

Any employee in possession of information or a reasonable suspicion of a breach of the law, applicable policies, procedures or provisions of the *Code of Ethics* is required to report such information promptly through any of the dedicated reporting channels.

The report may be sent by email to: naruszenia@Bankmillennium.pl or directly to the Director of the Human Resources Department. The report may be sent from the company's mailbox or anonymously from an external domain or may be placed personally by the employee in a special HR correspondence box (located in the Bank) or sent by mail.

The HR Department maintains a register in which all reports of violations are recorded. They are reported to the Process and Operational Risk Committee. The processing of a report is carried out on the basis of a procedure that describes the detailed course of analysis of such reports.

The investigative activities carried out are mainly individual interviews, conversations and anonymous questionnaires conducted with the employee group in question. If bullying or discrimination is confirmed, the Bank implements adequate measures, which are reviewed and verified as part of internal management processes.

A summary of the steps taken and explanations carried out is documented and presented in the form of a report to the Management Board Member overseeing the affected unit, the President of the Management Board and the Director of the Compliance Department.

We provide employees with access to mechanisms for reporting concerns and resolving issues, including those related to potential negative impacts in the workplace.

There is also a separate place on the Bank's Intranet site with detailed information for employees on countering bullying behaviours:

- what actions not to take,
- how to respond to behaviour that may constitute workplace bullying,
- how to prevent bullying from occurring.

Employees can submit inquiries, concerns and complaints through specialised channels, including:

- to the Ethics Officer - for matters relating to ethical issues,
- to functional mailboxes - for matters related to conflicts of interest, prevention of corruption and personal transactions of employees in financial instruments.

We ensure that all reports remain anonymous and confidential and takes appropriate measures to ensure that individuals who report violations in good faith or participate in investigations do not suffer any adverse consequences.

All reports are analysed and employees receive feedback. These activities are aimed at fostering a culture of openness, trust and accountability.

The Bank also has a well-developed internal communication system which:

- enables rapid communication of information relevant to employees,
- provides access to up-to-date information necessary to perform professional duties,
- facilitates the exchange of opinions and information via internal and external channels.

Cooperation with trade unions is another important element of reporting and resolving issues. Where an employee chooses to submit a concern through a trade union, the Bank maintains an ongoing dialogue with the union and jointly analyses the outcomes of investigations.

[S1-17] In 2025, 18 work-related complaints were reported to the Human Resources Department, of which 10 concerned bullying, and 3 concerned discrimination (including 2 complaints reported as verbal harassment). These notifications are related to Bank Millennium.

None of the complaints resulted in fines, penalties, or compensation being imposed on the Bank. The Bank also did not record any incidents related to human rights violations.

For comparison, in 2024, the Bank received 22 work-related complaints, of which 8 concerned bullying and 1 complaint was reported as harassment.

In the 2024 Sustainability Statement, the Bank did not disclose the number of work-related complaints due to the adopted approach of reporting only those complaints that resulted in fines, penalties, or compensation being imposed on the Bank. These notifications are related to Bank Millennium.

In 2024, similarly to 2025, none of the complaints resulted in financial penalties or compensation. The Bank also did not record any incidents related to human rights violations.

All reports were isolated in nature and were handled in accordance with the applicable procedures.

17.10 Privacy

17.10.1 Policies related to privacy

[S1-1] The Bank has in place the *Personal Data Security Policy in Bank Millennium S.A.*, which describes the general rules regarding the protection of data processed by the Bank. The purpose of the *Policy* is to define the rules for processing personal data in compliance with the requirements of the applicable legal regulations on personal data protection. The Group companies have their own documents governing personal data protection rules.

An internal document entitled *RODO Instruction* has been implemented for employees hired by the Bank under an employment contract. The document is intended to provide information and explain the principles adopted in Bank Millennium for processing employees' personal data.

The document contains detailed information on the purposes and duration of the employer's processing of employees' personal data and the rights an employee can exercise in connection with the processing of their personal data. The scope of the information provided corresponds to the requirements under EU

data protection legislation, i.e. *Regulation (EU) 2016/679 of the European Parliament and of the Council (Regulation)*.

These documents are described in more detail in section 17.1. *Workforce strategy*.

17.10.2 Actions taken to implement policy objectives

[S1-4] Ensuring the privacy of employee data is an important factor in a safe working environment. To this end, we carry out, among other things, the following activities: an annual review and necessary update of the policy, testing and assessment of the effectiveness of the technical and organisational measures implemented, and the provision of training on personal data protection. The training entitled "Personal data protection" is intended for all the Bank Millennium Group employees. It follows the formula of mandatory recurrent training held once a year. Oversight of completion of this training is exercised by the Data Protection Officer. The Bank monitors the level of completion of this training among its employees. Moreover, we have adopted a process for dealing with data protection violations, where the basic principle is to respond promptly and to treat each incident with special care.

Any employee the Bank Millennium Group may contact the Data Protection Officer on all matters related to the processing of their data via a designated email address: iod@bankmillennium.pl.

Information on the principles of personal data processing and privacy policy have been uploaded to our official Bank Millennium website at www.bankmillennium.pl/ochrona-danych.

17.10.3 Objectives related to the pursuit of policies and activities

[S1-5] Our goal in implementing the objectives adopted in the documents described above is to ensure data security. All information provided by our employees is protected using state-of-the-art technologies, in accordance with applicable legal standards, security requirements and confidentiality rules.

Monitoring the achievement of individual goals is supported by tools available to all employees of the Bank, enabling their measurability and effectiveness. They included: a dedicated channel for reporting violations, the training handling system, and the HR portal to report problems or questions related to the HR area. Our activities and objectives in the area of employee privacy protection are the same as those pertaining to customers, which is described in more detail in section 19.5 *Privacy*.

The above ambitions and directions of action do not constitute targets within the meaning of the ESRS (MDR-T).

18. Workers of the Bank Millennium Group's value chain (ESRS S2)

18.1 Strategy

[SBM-3] The Bank cooperates with numerous business partners. Key among these are its so-called distribution partners, i.e., franchisees as well as banking and leasing brokers. Therefore, this chapter focuses primarily on these groups, referring to them interchangeably as "business partners".

Cooperation between Bank Millennium Group companies and franchisees is regulated primarily by agency agreements. These agreements are concluded with economic entities independent of the Bank, which act in the name of and for the account of the Bank based on powers of attorney granted by the Bank. The Group also cooperates with brokers to whom it entrusts activities connected with intermediacy in the sales of mortgage and leasing products based on agency agreements.

[SBM-2] Following a double materiality analysis, one positive impact was identified related to working conditions of workers in the value chain.

IRO Type	Material impact, risk or opportunity – description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain			Time horizon		
ESRS S2 Working conditions							
Job security, Working time, Adequate compensation, Social dialogue, Freedom of association, including the existence of works councils, Collective bargaining, Work-life balance, Occupational health and safety							
Positive actual impact	<p>Impact related to the commitment of franchisees and brokers to observe the ethical principles and working conditions that apply in the Bank Millennium Group.</p> <p>Follows from the requirements regarding human rights and workers' rights, which are conditions for cooperating with the Bank Millennium Group and also values guiding us in our activity and the adopted business model.</p>						

Business partners of the Bank Millennium Group share the principles and approach adopted in our *Code of Ethics* – including those related to working conditions – which is confirmed by signing cooperation agreements. In 2025, work was underway on updating the contract template for banking brokers, which will also include the possibility of B2B cooperation from 2026.

We have identified no material negative impacts of the Bank Millennium Group, nor risks or opportunities related to the topic of workers in the value chain, concerning primarily employees of franchisees operating on behalf of the Bank Millennium Group as well as brokers cooperating with the Bank.

A description of the impact of interests, views and rights of people working in the value chain on the Bank's strategy and business model is described in section 15.2.3 *Key stakeholders*. The 2025-2028 Strategy does not refer to impact identified in this respect in the double materiality assessment process.

[SBM-3] Among workers in the value chain on whom we exert positive impact, we may distinguish employees working for entities in the entity's value chain at a lower level (franchisees and brokers).

The Bank has 237 partner branches across the country, employing a total of 902 people, including 162 people on branch manager positions and 139 representing franchisees (i.e. business entities cooperating with the Bank). 86% employees are women. 88% branches are located in towns with population below 50,000 inhabitants, due to which employees may be recruited from the local labour market. For comparison, in 2024, there were 242 branches (of which nearly the same number as currently, i.e., 87%, were located in towns with fewer than 50,000 inhabitants) employing a total of 870 people: 169 served as branch managers, and 143 people represented franchisees. Women constituted 87% of employees in the previous reporting period (incorrectly reported in the 2024 reporting as a value of 49%, which resulted from an error – oversight).

[SBM-3] [S2-4] The Bank takes a number of measures aiming to achieve material positive impact on people performing work in the value chain, including, among others, sharing a training catalog or adopting uniform standards for branches as workplaces for employees of own and franchise branches. The April 2025 update to agency agreements, which applied to all franchisees, added issues such as, among others: the engagement of agents and their employees in counteracting greenwashing, the obligation to comply with the sustainability principles adopted in the *Bank Millennium S.A. Policy on Sustainability Principles* (the policy has been made available to franchise employees via the MilleTeka internal site). A detailed description of the measures taken, how they are tracked and how their effectiveness is measured is provided in chapter 17. *Employees of the Bank Millennium Group*.

[SBM-2] A description of the impact of interests, views and rights of people working in the value chain on the Bank's strategy and business model is described in section 15.2.3. *Key stakeholders*.

18.2 Management of impacts, risks and opportunities

[S2-1] Business partners subject to the of *Bank Millennium Group Code of Ethics* undertake to comply with the principles regarding human rights and workers' rights in compliance with the *UN Universal Declaration of Human Rights*, addressing, among others, issues related to human trafficking, forced or compulsory labour and child labour. The issues of respecting human rights are also described in the *Diversity Management Policy* as well as in anti-discrimination and anti-harassment procedures. These documents are described in more detail in section 17.1 *Workforce strategy*. The Bank does not monitor the compliance with the principles following from the above documents by business partners. The mandatory observance of the provisions and rules of conduct adopted by the Bank is driven by the efforts to consolidate the rules applicable to all individuals cooperating with us across the entire Bank Millennium Group value chain. The group of stakeholders whose compliance with ethical principles is particularly important to us consists of the employees of our franchise branches (partner branches), which constitute an important distribution channel for the products offered by the Bank.

Our franchisees are bound by provisions of the *Bank Millennium Group Code of Ethics*, which the agency agreement explicitly refers to, granting it the status of the so called internal regulation, which the franchisee is obliged to comply with. In the franchise model used by the Bank, there is an absolute rule that each person employed by a franchisee and authorized to act on behalf of Bank Millennium must have an employment contract, which entails the necessity to apply provisions of the *Labour Code* to such employees. However, not every person authorized to act in the Bank's name has an employment contract, because franchisees are also authorized to act; as entrepreneurs, they are bound to the Bank directly by an agency agreement and not an employment contract.

The Bank decided to introduce such a requirement for several reasons, which include:

- ensuring observance of the *Banking Law* with regard to outsourcing,
- ensuring utmost protection of employees of franchise branches as provided for in the *Labour Code*,
- ensuring a uniform approach to responsibility and risk management of anyone acting on behalf of the Bank.

The *Code of Ethics* is described in detail in chapter 20. *Business Conduct*.

[S2-2] As at 31 December 2025, the Bank did not implement a general cooperation procedure for people working in the value chain. There is a practice of cooperation in this area, which is based on the assumption of treating franchisees and their employees the same as own employees in terms of, among others, access to corporate information, internal regulations, training, etc.

[S2-3] As part of promoting ethical values and establishing processes allowing for the mitigation of potential negative impacts, the Bank ensures that employees (including those employed by franchisees, i.e., people performing work in the value chain), as well as other external stakeholders, including suppliers and brokers, have the possibility of reporting violations of ethical standards via e-mail or traditional mail (also anonymously). We inform about this, among others, on the website in the Whistleblower Reporting section, where we present the numerous reporting channels that can be used and emphasise the principle of confidentiality of reports, while referring to a detailed description on the subpage: www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance.

Whenever an irregularity is discovered in the conduct of the Bank's employees (other than Management Board Members), it may be reported by e-mail to a dedicated address or by a letter sent directly to the President of the Bank's Management Board (this channel ensures the whistleblower's anonymity). As regards the identification of irregularities in the business conduct of the Bank's Management Board Members or Supervisory Board Members, the respective report should be made by letter directly to the Chairman of the Audit Committee of the Bank's Supervisory Board. Details are provided in chapter 20. *Business Conduct*, including 20.3. *Whistleblower reporting and protection*. The Bank makes the training "Reporting violations in Bank Millennium" available to employees of franchise branches, and this training is repeated every year. The Bank does not assess or monitor whether people performing work in the value chain trust the process described above as a system for reporting, resolving, and addressing their needs.

[S2-4] The requirements imposed by us to adhere to the *Bank Millennium Group Code of Ethics* by our business partners are aimed to ensure for all individuals working in the Bank's value chain that their employers' conduct complies with law and the best practices of ethical conduct. The attitudes promoted by us include:

- zero tolerance for violations of human rights of any kind, prohibiting any form of harassment, discrimination, coercion, abuse, violence or exploitation in the area of impact,
- respecting rights of people performing work, prohibiting the use of forced or child labour, and providing fair and just remuneration, guaranteeing equal opportunities and a balance between work, family and personal life in a work environment free of discrimination, harassment, threats and physical or psychological aggression; providing regular training for its employees,
- identifying, monitoring and preventing hazards to avoid occupational accidents and diseases, encouraging behavior that promotes employees' physical and mental well-being and safety, including the provision of appropriate protective measures and training.

The documents adopted in the Bank Millennium Group, describing sustainability principles (including the *Human Rights Policy*, *Diversity Management Policy*, *Supplier Sustainability Guidelines*) are made permanently available in the ESG section of the Bank's website. Due to the above, the Bank's business partners may familiarize themselves with possible amendments introduced to currently binding policies. For the Bank's employees, including employees of franchise partners, information campaigns are conducted to make them remember the prevailing principles in the area and inform them about changes to the regulations.

As part of information activities reminding employees of applicable sustainability principles, we used the corporate Intranet *World of Millennium* to invite staff to a webinar "Climate counts – carbon footprint in numbers and practice" as part of the "Development Friday" series on how daily choices affect the climate, and to participate in the webinar "Climate change: challenges and opportunities for companies" prepared by UNGC for UN Global Compact Network Poland partners, and in quizzes accompanying "Ethical Mondays" articles published on the Intranet (containing guidance on how to handle ethical problems). Activities of this type are conducted continuously and, in the Bank's opinion, they do not require significant investment and operating expenses. The Bank does not assess the results of the activities and initiatives undertaken in the context of people working in the value chain.

[S2-4] The Department, which is responsible for supporting our franchise partners, including ensuring the compliance with relevant standards of conduct is the Retail Banking Department – Franchise and POS Loans, which consists of the Franchise Branches Support Division and the POS Sales Division. In addition, there is a team of 20 Regional Directors, located in 3 Macroregions, managed by 3 Macroregional Directors. The total number of employees in the Department is 35, of which 31 are directly responsible for managing and supporting the franchise network. These numbers did not change compared to 2024.

Responsibility for cooperation with our leasing brokers rests with the structures of Millennium Leasing Sp. z o.o. On the other hand, relations with brokers of mortgage loans are supervised by the Retail Banking Marketing Department.

Management of material impacts on people working in the value chain is carried out within ongoing operating activity of the above departments.

[S2-4] In 2025 (similarly as in 2024), no serious issues or incidents were reported which would concern the violation of human rights in the Bank's value chain.

[S2-1] The Bank received no reports of cases of non-compliance with the *UN Guiding Principles on Business and Human Rights*, the *International Labour Organisation's Declaration on Fundamental Principles and Rights at Work* or the *OECD Guidelines for Multinational Enterprises*.

18.3 Metrics and targets

[S2-5] The goal of the Bank Millennium Group is to maintain the positive impact on workers in the value chain, therefore the largest groups of business partners, namely franchisees and bank brokers, accept the sustainability principles adopted by the Bank (as described above). After a review, the ambitions specified in this report section for the previous reporting period (2024) were not deemed to be the targets within the meaning of ESRS. This area was also not reflected in the Group's strategy in effect since 2025. The Bank has not set other measurable and time-bound objectives in this area, due to the nature of the area, and has no plans to set such targets in the near future, because it manages it through existing policies and contractual standards and not by setting targets or ambitions metrics.

19. Bank Millennium Customers (ESRS S4)

19.1 Customer strategy

19.1.1 Interests and views of stakeholders

[SBM-2] Customers remain a very important stakeholder in our value chain. Our offer is addressed to retail customers and micro-businesses (in the retail segment), and to corporate banking customers – small, medium-sized and large enterprises.

The description of the approach to managing customer-related topics presented in this chapter applies to the Bank's retail clients. This follows from the definition of the term "consumers and end-users" in ESRS S4, which defines this group as individuals who acquire, consume or use goods and services for personal use, either for themselves or for others, and not for resale, commercial or trade, business, craft or profession purposes.

In our daily operations, we carefully analyse customer feedback to address their needs in the best possible way. Customer opinions, expectations and suggestions are a key source of knowledge that we use to improve our strategy, business model and service model. They form the foundation for implementing innovations and improvements in our products, services and in the Bank's overall operations.

Customer feedback is processed in the CX Loop and Voice of Customer software (as described in more detail in section 19.2 *General customer engagement processes*). On this basis, we implement improvements, counteract negative impacts and amplify positive customer experiences. We collect feedback from the following sources:

- Branches, mobile and internet banking
- Intranet, community forum
- Hotline
- Complaints
- Satisfaction surveys.

Additionally, in September of this year we conducted a nationwide stakeholder survey, in which we asked 303 retail clients for their views on Bank Millennium's impact on sustainability-related matters. The survey took the form of a questionnaire, and by answering the questions clients influenced the selection of material topics that we describe in this chapter.

Respect for human rights is among the fundamental objectives and commitments of the entire Bank Millennium Group. More information is provided in section 19.3 *Respect for human rights in customer relations*.

19.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model

[SBM-3] As part of the analysis of impacts, risks and opportunities in the area relating to customers (S4: consumers and end-users), we have identified ten issues that were assessed as material in the double materiality assessment process. Those included five positive impacts, three negative impacts and two risks. We have not identified any material opportunities in this area.

The material topics identified in the double materiality analysis include four sub-topics from the ESRS guidelines (seven issues) and one sub-topic classified as specific to a financial institution (three issues). A detailed description of the material impacts and risks is provided in the table below.

IRO Type	Material impact, risk or opportunity - description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain		Time horizon			
ESRS S4 Consumers and end-users							
Information-related impacts on consumers or end-users							
Positive actual impact	Impact resulting from taking numerous actions to ensure that customers have access to reliable information about product offerings across all sales channels		●		●		
Negative potential impact	Impact on retail customers due to under-information of customers		●		●	●	●
Risk	Risk related to possible changes in consumer protection regulations or their interpretation		●		●	●	●
Positive actual impact	Impact resulting from measures to ensure privacy and confidentiality and security of customer data as well as processes for handling data breaches and ensuring transparent information about data breaches		●		●		
Negative potential impact	Impact resulting from exposure to leaks of personal data and bank secrecy, including as a result of a cyber attack		●		●	●	●
Social inclusion of consumers or end-users							
Positive actual impact	Impact related to providing clear and understandable information about the Bank's products and services		●			●	
Positive actual impact	Impact related to ensuring inclusiveness of products and services.		●			●	
Sector-specific topic: Safety of deposited funds							
Positive actual impact	Impact resulting from cybersecurity measures taken		●		●		
Negative potential impact	Impact related to the security exposure of deposited funds due to cyber attacks		●		●	●	●
Risk	Risk of data leakage, loss of trust and financial losses due to cyber attacks		●		●	●	●

The Bank takes comprehensive steps in the area of impacts and risks related to information, social inclusion and safety of deposited funds:

- **Access to high-quality information:** The Bank ensures compliance of documentation, products and service with applicable regulations, continuously monitors and implements changes in legislation. Products are analysed and approved in line with internal guidelines. Implemented sales and service standards limit the risk of unethical practices and incomplete customer information, and their compliance is regularly assessed, inter alia through mystery shopping studies and customer opinion analysis. These actions increase customer awareness, satisfaction and trust in the Bank, as confirmed by industry rankings, including Bank Millennium's victory in the "Newsweek Friendly Bank" ranking in 2025.

At the same time, the Bank is aware of potential negative impacts related to the risk of inadequate customer information, arising from both changes in regulations and their interpretations, as well as internal management processes. A failure to manage this area properly could lead to loss of customer trust, reputational damage and additional costs.

The risk associated with increased consumer protection and the activity of regulators and customers in the area of inadequate information, especially in the retail segment, may result in financial penalties (e.g. UOKiK - Office of Competition and Consumer Protection fines) and may have an adverse effect on the Bank's financial result. Considering the regulated nature of our operations, this risk requires continuous monitoring of changes in laws, active dialogue with

regulators and early identification of the effects of new regulations. Managing this risk is part of the Strategy of the Bank and the Bank Millennium Group 2025–2028 “*Strategy 2028 - Value and Growth*” and entails, among others, participation in sector-specific initiatives and mitigating actions.

- **Privacy:** In the area of privacy protection and personal data security, the Bank has in place appropriate procedures, policies and has appointed a Data Protection Officer. Technical and organisational measures are used to ensure data confidentiality, including breach response processes and transparent incident notification. The Bank continuously improves safeguards for personal data processing, provides customers with access to information clauses and conducts employee training. Customer data is additionally protected by banking secrecy.

Potential negative impact may result from personal data leaks or banking secrecy leaks, also as a result of cyberattacks. These threats may affect all customer groups, among others due to the rise in attacks utilizing advanced social engineering methods. The Bank responds by intensifying customer education efforts and by developing its own countermeasures to cyber threats, which represent a systemic challenge for the entire banking sector.

- **Responsible marketing practices:** The Bank’s impact is associated with corporate governance structures implemented in the marketing communication area. The Bank has internal regulations on creating informational and advertising materials, compliant with applicable laws and recommendations from supervisory and industry institutions. These regulations set out principles for preparing and publishing marketing materials, ensuring that clients – especially retail clients – receive transparent and understandable information about the Bank’s products and services.
- **Non-discrimination:** The Bank strives to ensure inclusive and accessible banking for all customers, offering secure access to financial services, including for people with disabilities. The measures include offerings for young customers, cooperation with expert institutions, enhancing service accessibility and education, promoting savings and investments, and financial education by the Bank Millennium Foundation. Under *Strategy 2028*, the Bank focuses on creating innovative products and improving distribution channels to prevent exclusion and maintain solid corporate governance processes to prevent discrimination.
- **Safety of deposited funds:** The Bank ensures security of client funds through advanced cybersecurity solutions, payment protection, secure data transmission and the ability to block cards and account access. A comprehensive information security management model and the Fraud Risk Management Programme for Employees have been implemented. The Bank conducts audits and tests of its IT systems, monitors threats, provides training to employees and clients across all customer groups, participates in sector initiatives, and publishes warnings about new methods used by criminals.

Potential negative impacts may arise from inadequate safeguards, which could lead to loss of customer trust and destabilisation of the financial system. Potential threats related to the loss of funds may affect all customer groups, including individuals and corporates, due to the development of advanced social engineering and cybercrime methods. The Bank intensifies its educational activities and develops its own mechanisms to counteract the threats.

Cyberattack risk may result in financial losses, data leaks and loss of customer and investor trust. The risk affects all client groups, including retail clients, and given the increasing frequency and complexity of attacks, the Bank is strengthening its technological and organisational resilience. *Strategy 2028* includes actions aimed at effectively managing this risk.

Protection of funds deposited by clients, coupled with access to high-quality information, as well as privacy, personal data security and banking secrecy are at the core of our business and the essence of banking. Management of impacts, risks and opportunities identified in the double materiality assessment has been incorporated into both the Bank Millennium Group’s strategy (*Strategy 2028*) and in the Bank’s internal regulations. The Bank is ready to effectively respond to challenges related to impacts and risks characteristic of the banking sector, including those identified in the double materiality assessment.

19.2 General customer engagement processes

[S4-2] We strive to build the best possible customer experience in the daily use of our services; to understand their needs and potential barriers they face in their relationship with the Bank. We make sure that the degree of customer satisfaction with our services is constantly increasing, which is why we listen to customer opinions and thoroughly review any comments and needs they report. We make sure that our services are accessible to all customers. We strive for every customer to be able to use our products and communication channels on equal terms. This is why we improve accessibility in various areas, such as service in branches, digital channels and informational materials. If a customer notices non-compliance with accessibility requirements, they can report it to the Bank. In accordance with Article 35 of the Act of 26 April 2024 on ensuring compliance with accessibility requirements, we have also made available a procedure for submitting complaints regarding products or services that do not meet these requirements.

Our customers are able to provide their feedback through a variety of channels: at the branches, by phone, through electronic banking, by letter and in mobile app stores. The information they report about the shortcomings and needs they identified is analysed by us in detail and used to improve products and streamline processes.

We proactively and regularly monitor satisfaction with the relationship with the Bank, and with the use of our products, contact channels as well as specific processes. We deepen the monitoring of satisfaction and willingness to recommend our services through quantitative and qualitative studies. Insights gained from customer experience monitoring and studies is used to improve products, services and processes. We conduct work in this area and manage customer experiences in a systematic manner, which includes, among others, prioritisation, solution design, implementation monitoring, measurement and achievement of adopted targets.

We actively engage customers at the design stage of our digital solutions. For more than ten years now, the Bank has had a UX Lab, where specialists conduct in-depth analyses, user interviews and test new functions. The customer is at the centre of our every project – all enhancements in online banking and the mobile app are prepared based on customer needs, habits, communication method and surrounding reality. Teams responsible for the quality of digital solutions continuously analyse customer comments, complaints, satisfaction surveys, as well as errors reported by customers. On this basis, improvements and changes to existing processes are planned, but this also forms the foundation for creating and updating design standards for new solutions.

Cooperation with customers also takes place within the complaints process. We thoroughly analyse the information about the perceived imperfections, but also the needs that customers report to us in complaints and use it to improve our products and processes as part of the Voice of Customer (VOC) programme for eliminating causes for complaints. Its goal is to identify and monitor the timeliness of remedial actions to address potential irregularities. Every reported initiative is consulted with process owners and substantive units to eliminate errors, introduce process changes and prevent potential future complaints in this way. As part of the complaint process, we provide the customer with a response through the customer's preferred channel of contact. If the customer's expectations are not met, we inform them of the possibilities for appealing the decision. In addition, the Bank has implemented a process for accepting complaints regarding lack of service accessibility, in accordance with Article 35 of the Act of 26 April 2024 on ensuring compliance with accessibility requirements. We treat each complaint individually and analyse it taking into account the specific customer situation. Information on a customer complaint is forwarded to business owners, who can implement appropriate actions to eliminate systemic or process gaps.

With regard to identified impacts, we strive to ensure that all customer feedback is addressed properly. Customer feedback is forwarded to the units responsible for managing the respective area, where it is analysed. The further course of action in many cases depends on the nature of the report. As a public trust institution operating in a regulated financial market, we are subject to sector-specific regulations, including cybersecurity and customer data privacy issues. This means that the Bank takes customer feedback into account, guided by applicable regulations and acting in the best interest of its customers.

the Quality Department is responsible for the implementation of customer cooperation processes and the Digital Customer Experience Department at UX LAB is responsible for the design of digital solutions. Both units report directly to a Member of the Bank's Management Board.

Assessment of the effectiveness of cooperation with customers is reflected in the satisfaction surveys conducted by the Bank and in the ongoing monitoring of Voice of Customer (VOC) programme notifications.

19.3 Respect for human rights in customer relations

[S4-1] Respect for human rights is embedded in the core objectives and commitments of the entire Bank Millennium Group. Our business activity is based on the principles of corporate social responsibility, in particular by pursuing the *United Nations Sustainable Development Goals*. As the Group, we are committed to respecting human rights, ensuring compliance with national and international law (including the *UN Universal Declaration of Human Rights*) and the *10 Principles of the UN Global Compact*. In this spirit, we also define our internal practices and procedures.

Our approach to the protection and respect of human rights is set out in the *Human Rights Policy*, implemented as part of the *Policy on Sustainability Principles of Bank Millennium S.A.* This policy is available to customers on the Bank's website. The Bank's Management Board is responsible for its implementation.

We treat all our stakeholders with respect, not tolerating any form of discrimination. We offer financial products and services tailored to the individual needs of our customers. We adopt policies and procedures that provide an adequate approach to customers, while observing their right to privacy and ensuring the confidentiality and security of their data. We promote sustainable financing by encouraging customers to engage in a sustainable transition of their businesses.

The *Human Rights Policy* also governs mechanisms for evaluating and monitoring compliance with human rights. With respect to customers, these include, among others: promoting and ensuring compliance with the *Code of Ethics of the Bank Millennium Group (Code of Ethics)* principles among Bank employees, monitoring human rights violation risks, providing a confidential channel for reporting irregularities and violations – also anonymously – including in relation to human rights, and implementing a process for assessing detected incidents. The Policy applies to all stakeholders of the Bank and the Group.

In Bank Millennium, we consider every case of violation individually. In the event of a potential human rights violation, the Bank's established processes ensure the implementation of appropriate remedial measures.

The *Human Rights Policy* is aligned with the *UN Guiding Principles on Business and Human Rights* in terms of the company's policy-level commitment to take responsibility for respecting human rights by putting procedures and solutions in place for taking remedial action in the event of a negative impact on human rights caused or contributed to by the Bank. According to the *Guiding Principles*, the Policy gets approved at the company's highest level, is based on the knowledge and experience accumulated within the Bank, includes the Bank's human rights expectations for employees, business partners and others directly related to its operations, is publicly available on the Bank's website, and is reflected in the Bank's day-to-day operations. The Bank is getting ready to implement regulations consistent with the *Corporate Sustainability Due Diligence Directive (CSDDD)*. These activities will be associated with a re-review of the compliance of the Bank's internal documents pertaining to respect for human rights with universally applicable guidelines (specifically, the *UN Guiding Principles on Business and Human Rights*, the *International Labour Organisation's Declaration on Fundamental Principles and Rights at Work* and the *OECD Guidelines for Multinational Enterprises*).

In the area of respecting human rights in relations with customers, mention should also be made of the ongoing adaptation of the Bank to the requirements of the Polish Accessibility Act (Act of 26 April 2024 on ensuring compliance with accessibility requirements for certain products and services by economic entities).

Within the Bank Millennium Group's own operations, in 2025 and previous years, there were no recorded cases of violations of the *UN Guiding Principles on Business and Human Rights*, the *ILO Declaration on Fundamental Principles and Rights at Work*, or the *OECD Guidelines for Multinational Enterprises* relating to customers.

In 2025, as in 2024, no human rights violations were reported in the area of customer relations.

19.4 Safety of deposited funds

19.4.1 Policies related to the safety of deposited funds

[S4-1] Ensuring safety of funds deposited by clients is a pillar of Bank Millennium's operations. Our management of this area is based on activities compliant with our internal security regulations, primarily the *Bank's Security Policy*, the *Bank Millennium Security Strategy*, the *Bank's Digital Resilience Strategy* and the *Security Incident Handling Procedure*.

The *Bank's Security Policy* supports the organisation's assurance of compliance with applicable legal regulations, industry standards and regulatory expectations in the safety area, which is crucial for maintaining reputation and trust among our stakeholders, including customers. The document is the foundation for planning, implementing and maintaining: the information system security in the Bank, the physical security in the Bank, and the business continuity programme.

The Policy defines the framework and direction for the protection of the Bank's physical and information assets through the establishment of effective security management mechanisms. This includes, among others, the management of ICT risk, prevention of adverse events and taking corrective actions if adverse events occur. The document establishes the principles for performing tasks related to security in the broadest sense and provides a coherent foundation for all procedures, regulations and standards applicable in this area at the Bank. The *Policy* is developed by the Security Department and the Bank's Management Board is responsible for approving, implementing and modifying it.

The *Bank Millennium Security Strategy* was implemented in 2025. It defines directions for the Bank's actions in the area of security, integrated with the Bank's *Strategy*, to protect resources (information, systems, infrastructure and people) against threats and ensure regulatory compliance. The *Strategy* sets out a "top-down" framework and indicates how the Bank protects resources and defines its security priorities. The document covers, among others: business continuity, access management and information protection, system and network security, incident monitoring and response, risk management, employee training, data backup and recovery, cooperation with suppliers, and physical security of people and property. The *Strategy* envisages activities such as: operationalisation, effectiveness assessments, regular testing, definition of roles and cooperation processes, and linkage to lower levels of a four-tier security management pyramid.

The *Bank Millennium Security Strategy* provides for regular reviews at least annually, as well as ad-hoc reviews following significant changes in the legal, technological or organisational environment. The Security Department serves as the substantive owner of the document. The *Strategy* is approved by the Bank's Management Board.

The *Bank's Digital Resilience Strategy* is a document, which defines the approach to ICT (Information and Communication Technologies) risk management at Bank Millennium. Its objective is to minimise ICT risk to guarantee data integrity, confidentiality, availability and authenticity, and to ensure the Bank's business continuity. The *Strategy* also supports legal compliance, cost optimisation, process improvement, innovation support, and maintenance of a positive image and customer trust.

The *Bank's Digital Resilience Strategy* includes the management of various ICT risks, including operational, reputational, legal, business and strategic risks. This document is being developed by the Security Department. The Bank's Management Board is responsible for its approval, implementation and ongoing monitoring.

The ICT security management system consists of a set of the documented processes and regulations in force in the Bank and in the part aligned with the profile of the activity they conduct. The ITC security management system complies with both the *National Cyber Security System Act* and the *DORA*.

Key objectives of ICT risk management include:

- Ensuring data integrity, confidentiality, availability and authenticity.
- Business continuity: supporting the process of ensuring the continuity of the Bank's ICT operations, even in circumstances involving disruptions to or failure of ICT systems.
- Regulatory compliance: ensuring the Bank's compliance with applicable regulations on digital resilience, data protection, user privacy and other technology-related issues.
- Cost optimization: minimizing technology management expenses by efficiently allocating resources and avoiding unnecessary investments.
- Process improvement: identifying and minimizing ICT risks to improve the Bank's processes and operations.

- Innovation and growth: supporting the Bank's innovation and growth by enabling the secure deployment of new technologies and solutions.
- Image and trust: maintaining a positive image and trust of customers, business partners and stakeholders by ensuring a secure and reliable technological environment.

The *Security Incident Handling Procedure* sets out in detail the process for handling information security incidents. The document covers stages such as the identification, reporting, analysis, remediation and closure of incidents. The *Procedure* also includes definitions of key terms such as information security incident, cyber threat, ICT security incident and major ICT security incident.

The *Procedure* has been designed to ensure compliance with applicable legal requirements and security standards, including ENISA guidelines, NCS Act, GDPR and DORA. The document also includes information on incident handling responsibilities and a description of the organisational structure of incident management teams. The development, approval and implementation of the *procedure* fall within the responsibilities of the Head of the Security Department (CISO).

In our Bank, all internal regulations are subject to periodic reviews by the document owner, who is the director of the unit or the process owner responsible for developing the regulation. The document owner updates the document when appropriate circumstances require it.

The purpose of the Bank's internal regulations includes, among others, preventing and identifying various risks associated with banking operations. The Security Department is in charge of monitoring compliance with the internal regulations concerning the security of deposited funds, as indicated in this chapter, as well as for their reviews and updates. For this purpose, it uses tools implemented as part of individual processes, such as ongoing reports or monitoring of critical indicators, which enable current monitoring of activities and assessment of their effectiveness.

Commitments to respect human rights at Bank Millennium, including in respect of the safety of deposited funds, are presented collectively for all relevant impacts in section 19.3 *Respect for human rights in customer relations*.

19.4.2 General customer engagement processes in terms of the safety of deposited funds

[S4-2] As part of measures to ensure the security of customer-entrusted funds, the Bank cooperates with customers at the operational level during security incidents and builds their awareness of digital threats.

In the event of a cyber-attack, the Bank uses several customer cooperation mechanisms to ensure effective protection and reduce potential in accordance with the *Security Incident Handling Procedure* described in the section above. First, we notify customers of the threat and provide instructions on how to secure their accounts. At the same time, we monitor and prevent the execution of suspicious transactions to prevent any potential losses. We additionally cooperate with law enforcement agencies and Internet service providers with a view to shutting down fraudulent sites.

In practice, cooperation with the customer is as follows: when an incident is detected, the customer is promptly notified of the threat and provided with detailed instructions on what to do next. The Bank monitors the situation and takes corrective action, such as preventing the execution of suspicious transactions and cooperating with appropriate authorities. The customer is kept informed of the progress and actions taken by the Bank to resolve the problem.

Cooperation with the customer also includes a standard complaint process, which is more dynamic in the case of active cyber-attacks. Detailed information on the complaint procedure is in section 19.9 *Remediation of negative impacts*.

In terms of building customer awareness of digital threats, the Bank conducts educational activities, as described in more detail in section 19.4.3 *Measures to ensure the safety of deposited funds*.

Information on general customer engagement processes is presented in section 19.2 *General customer engagement processes*.

19.4.3 Measures to ensure the safety of deposited funds

[S4-4] Bank Millennium carries out a number of activities including the management of the risks and impacts identified in our double materiality analysis, focused especially on the safety of deposited funds. Due to security concerns, we keep confidential any information on the processes by which we determine the type of measures to be taken or how we assess their effectiveness. At the same time, we ensure

that our activities are appropriate and effective, drawing on best market practices and our experts' knowledge.

We regularly subject our information systems to security audits/tests – both external and internal ones. In addition to the audits required by the provisions of the *National Cyber Security System Act*, performed at least once every two years, the Bank carries out a number of pertinent audits/tests on an as-needed basis. The audit processes concern systems in operation, with a particular focus on systems that process customer data, systems made available online as well as modifications, new solutions and systems that are being rolled out. In connection with the DORA requirements being introduced, the Bank is preparing to participate in mandatory Threat-Led Penetration Tests (TLPTs), which will be carried out in accordance with the recommendations of the Polish Financial Supervision Authority. TLPTs are a key component under DORA to assess the resilience of financial institutions to advanced cyber threats.

Bank Millennium has in place a comprehensive information security management model for protecting all information processed in the Bank, including information on customers, employees, business partners and transactions. In order to achieve this goal, we use a broad range of organisational, procedural and technical measures, including in particular device protection mechanisms, systems, applications, databases and communication channels. The information security management model was developed to safeguard against influence being exerted by key risks such as a potential loss of information concerning financial transactions, a leak of confidential information and inaccessibility of services.

We make every effort to effectively protect our customers' funds and privacy. To this end, we conduct comprehensive risk analyses both at the stage of designing new products and services and in the area of the Bank's ICT environment.

We attach particular importance to the security of our customers using electronic channels to access banking products and services and we continue to improve technical and operational security measures. We have been using tested and safe methods to confirm identity of IT system users and we continue to develop them to ensure safe and convenient access to the Bank's systems. Our customers may use innovative identification methods such as biometric fingerprint data.

In the area of monitoring of online fraud transactions, the Bank's activities focus on incorporating data from specialised providers of Threat Intelligence solutions into abuse detection mechanisms and on increasing the share of anti-fraud mechanisms based on predictive models and artificial intelligence, in order to proactively protect the Bank against new cyber threats.

Bank Millennium continuously monitors new threats and how criminals operate, so we can counter them effectively. We also actively cooperate with financial sector institutions in Poland and abroad to share insights on the latest threats, trends, and evolving fraud tactics.

The data and funds of our Bank's customers remain under constant oversight of a specialised team responsible for the security of all access channels to services and products. Within the Bank's organisational structure, the Security Department has been established and put in charge of ensuring security in the broadest sense, with teams that deal with all aspects of security: from physical security, to all aspects of cyber security and ICT security, to fraud risk management. Also, within this unit, a dedicated team is responsible for performing ongoing vulnerability checks on the Bank's systems. Such checks are performed on a continuous basis. The Bank acts proactively against potential security incidents through monitoring and ongoing operation of the Security Operation Center (24/7).

The obligatory educational programme applicable to all employees forms a major part of our information security system. It contains a set of information about the best practices in personal data protection, banking secrets, trade secrets and other confidential data. Employees are trained regularly on the rules for preventing abuse and ensuring protection of the customers' funds and data. Additionally, a number of technical safeguards operating in a multi-layer model (defence in depth) have been implemented in this area. Moreover, we conduct regular controlled phishing campaigns, thereby further increasing the level of security maturity of our employees. The Bank monitors the delivery of training efforts in security-related areas, including digital security, by employees, and reports the outcomes to the units responsible for monitoring risk indicators.

In order to achieve a positive impact in terms of the safety of deposited funds, we are taking numerous measures in the cybersecurity area. This is done primarily to support the Bank's innovation and development by enabling the secure implementation of new technologies and solutions as well as the early identification and minimization of ICT risks to improve the Bank's operational processes and

activities. Furthermore, we are focused on educating various customer groups, including seniors, teenagers and parents of younger children, about cybersecurity.

We join sector-wide activities coordinated by the Polish Bank Association, but also conduct our own communication activities. Educational communications are provided to customers through various channels, including the mobile app, online banking and social media. We also publish warnings about new criminal methods on our website and electronic channels. In 2025, we expanded the educational section in the mobile app. Within a few months, the section was visited by over 280,000 app users (as at December 2025).

We also study customer expectations and their reception of these communications. We conduct qualitative research in the Bank's UX Lab and quantitative research using third parties. Based on the research and historical data, we build customer profiles for personalized educational communications. At the same time, we seek new, more accessible forms of expression, with particular emphasis on young audiences. In our campaigns, we use video formats and collaborate with influencers. In 2025, the Bank was the title sponsor of the Virtual Vibes music festival on Roblox, where participants completed series of educational quests on cyber threats and defence strategies.

In order to mitigate the negative impact of potential cyber-attacks on the financial system and public trust, it is absolutely crucial to ensure a secure and reliable technological environment. To this end, our process for ensuring the continuity of the Bank's ICT operations, taking into account any disruptions and failures of ICT systems, plays a significant role. As part of the process, we take steps to minimize potential inconvenience to customers and take into account the provision of relevant information to stakeholders, commensurate with the level of threat and potential consequences resulting from possible attacks.

To manage the risk of loss of safety of deposited funds due to a cyber-attack, we take care to ensure the integrity, confidentiality, availability and authenticity of data. We proactively operate a Security Operation Center (available 24/7) and conduct ongoing monitoring to promptly respond to any potential security incidents. On a continuous basis, we perform ongoing vulnerability checks on the Bank's systems. We also use the best technological and organisational solutions to ensure the security of our ICT environment.

Our goal is to ensure a high degree of security of funds deposited by customers by identifying and minimizing risks associated with cyber-attacks and other ICT threats. We carry out these activities continuously, developing and improving them on an ongoing basis.

In order to monitor the safety of customer funds, we implement a number of activities and use various tools. We use key performance indicators (KPIs) and key risk indicators (KRIs) for ICT security. For instance, we monitor the number of ICT security incidents related to receiving or attempting to send unsolicited content. Monitoring is carried out on an ongoing basis, and reports are generated quarterly. For security incidents, reporting is performed both internally and to external authorities. We use advanced tools to analyse and monitor transactions and ICT systems. We use incident classification in accordance with ENISA's *Reference Incident Classification Taxonomy*.

The monitoring results are transmitted to units responsible for risk monitoring and to the Bank's Management Board. According to the regulations, in the event of serious incidents, reports are also submitted to the national or sectoral Computer Security Incident Response Team (CSIRT).

The Bank refrains from disclosing information on specific targets, metrics and ways to track and evaluate activities in the area of safety of customer funds. These constitute trade secrets.

The Bank has put in place appropriate organisational structures to effectively manage the identified impacts and risks and provides resources for the operation of such structures. The expenses incurred in connection with these activities are an adequate portion of the Bank's IT investment outlays and IT operating expenses, but due to the complexity of the activities and their confidential nature, we do not disclose detailed data in this area.

In this respect, a key role is played by the Security Department, which has been put in charge of ensuring the security of the organisation by managing both physical and information-related risks. The Department's key tasks focus on identifying potential risks and on developing and implementing strategies to minimize them. The Security Department cooperates with the Bank's other organisational units and external regulators to ensure business continuity and improve security.

19.4.4 Objectives related to the pursuit of policies and activities

[S4-5] Ensuring safety of deposited funds is a fundamental element of our business model. In the Bank's 2025-2028 strategy entitled "*Strategy 2028 – Value and Growth*," we presented the technology development plan, whose objective is to support business strategy initiatives and ensure security for customers and the organisation. The Plan is divided into seven areas – one of them being digital resilience and security, under which the following two main goals have been specified:

- Continuous strengthening of technological and organisational resilience to protect the Bank and its customers from current and future cybersecurity risks.
- Further development of information and communications technology (ICT) risk management to prepare for new threats.

Strategy, including the technology development plan, are monitored and reported on a quarterly basis. The Bank refrains from disclosing information on the details of its targets, their metrics and baselines and desired target levels related to the security of customer funds. These constitute trade secrets.

The Bank cooperates with other players in the Polish financial market to share experience and information, including on cyber threats. When defining goals in the digital resilience and security area, the Bank draws on the knowledge and experience of its experts, without involving customers in this process.

19.5 Privacy

19.5.1 Policies related to privacy

[S4-1] In Bank Millennium, personal data of our customers is processed mainly to sign agreements, operate bank accounts, securely execute instructions, perform obligations imposed on the Bank by law, and to inform the market about new services and products.

Acting as a data controller, we make every effort to meet the requirements of *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural people with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (GDPR)* and thus ensure proper protection of personal data. Additionally, under Banking Law, customer data are protected by banking secrecy, which requires even more stringent safeguards.

To ensure GDPR compliance, the Bank has implemented the *Bank Millennium Personal Data Security Policy*, applicable to all business lines and Bank Millennium Group companies. The purpose of the *Policy* is to define the rules for processing personal data in compliance with the requirements of the applicable legal regulations on personal data protection. The *Policy* defines rules for processing personal data in line with applicable data protection regulations and sets general principles to be followed by all processors, whether in IT systems or paper form.

The principles described in the *Policy* enable effective management of the identified impacts: the potential negative impact associated with a breach of personal data protection and the actual positive impact resulting from actions to ensure the privacy, confidentiality and security of customer data. The implementation of measures envisaged in the *Policy* is monitored by the Data Protection Office. This unit conducts ongoing monitoring of the applicable provisions of law and, in the event of changes in legislation, prepares recommendations for changes to the Bank's existing internal regulations.

The *Bank Millennium Personal Data Security Policy* establishes general rules for the processing of personal data, which should be observed by all people processing personal data in Bank Millennium. The scope of the *Policy* includes the following issues:

- Principles of personal data processing
- Responsibilities of the Data Protection Officer
- Rights and responsibilities of IT systems users
- Data processing transparency
- Data subjects' rights
- Data processing risk analysis and impact assessment
- Subcontracting of personal data processing and data sharing

- Technical and organisational measures to ensure the security of personal data
- Handling of data breaches.

Within the framework of the adopted rules for the processing of personal data, the Bank ensures that they can only be accessed by individuals with appropriate authorizations and certificates. Access control is implemented both by restricting access to rooms where paper-based information is stored and by ensuring that appropriate procedures are in place for access to all sets of personal data in electronic form.

Personal data entrusted to the Bank may be processed only based on a valid legal basis for such processing in respect of each instance of personal data processing.

Every Bank employee must observe the rules set forth in the *Policy*. The Bank's Management Board is responsible for its approval, implementation and amendments.

The Data Protection Department is responsible for monitoring compliance with the *Personal Data Security Policy*. Monitoring is carried out on a continuous basis as part of reviewing processes, documents, contracts and others. Moreover, as part of the handling of incidents, the Department recommends taking appropriate mitigating actions.

On the website www.bankmillennium.pl/en/data-protection we provide detailed information for customers on personal data processing in Bank Millennium and our privacy policy. The site includes, among other documents containing detailed information on the processing of personal data in the Bank, as well as information on customers' rights in this area.

Commitments to respect human rights at Bank Millennium, including in respect of personal data protection, are presented collectively for all relevant impacts in section 19.3 *Respect for human rights in customer relations*.

19.5.2 Customer engagement processes in terms of privacy

[S4-2] The principles of personal data protection and banking secrecy of customers are governed by the laws that form the foundation for the business of financial institutions (in particular: *GDPR*, *Personal Data Protection Act*, *Banking Law*). Therefore, the Bank is obliged to strictly observe these requirements and the process for cooperating with customers in the area of privacy is shaped directly by the applicable regulations.

To this end, the Bank, acting as a personal data controller, has appointed a Data Protection Officer to oversee compliance with data protection laws and with the Bank's policies. Data subjects may contact the Data Protection Officer on all matters related to the processing of their personal data and the exercise of rights under *GDPR*. The Data Protection Officer's contact details are published on the Bank's website and included in the wording of information obligations provided to customers.

The Bank's customers enjoy a number of rights regarding their personal data, including the right to access, change, restrict the processing of such data, and the right to withdraw consents granted for particular purposes of data processing. In this respect, they may contact the Data Protection Officer directly, as well as the Bank's employees in branches, through the hotline, may submit a request in the Milenet internet banking system, or send a letter to the Bank Millennium address.

The Bank is obliged to provide the requested information to the customer, within the deadlines specified in the applicable law.

The Bank takes all possible corrective measures whenever irregularities in data processing are identified. Personal data obtained in violation of the law, and those that are erroneous or unnecessary in the context of the purpose of processing, are corrected or removed.

Detailed information on general customer engagement processes is presented in section 19.2 *General customer engagement processes*.

19.5.3 Measures related to privacy

[S4-4] In Bank Millennium, we process customers' personal data using appropriate technical and organisational measures to ensure their security. Personal data are one of the Bank's most critical assets and protecting them is our top priority. The measures that we take enable effective management of any identified privacy impacts.

Key activities conducted by the Bank in this area are as follows:

- Continuous improvement of the technical and organisational resources used to ensure the protection of personal data processing, in particular the protection of data against unauthorized access, loss or unauthorized alteration. The goal is to ensure the broadest possible protection of personal data processing.
- Employees are trained to ensure the highest standards of privacy in respect of the Bank's customers. All employees undergo periodic training on personal data protection. Each new employee is required to participate in a training course on personal data processing immediately after hiring, while all employees undergo refresher training annually. We monitor the degree of training completion and strive to ensure that 100% of employees fulfil their training obligations within the set time limit.
- Protection of personal data is taken into account already at the design stage of new processes, systems and services. This implements the *privacy by design* and *privacy by default* principles. Also, each time we introduce a new project or process in the Bank, we review it for its impact on the processing of personal data. The purpose of such examination is to minimize the risk of violating the rights or freedoms of individuals.
- The process for dealing with data protection violations, where the basic principle is to respond promptly and to treat each incident with special care. The Bank provides resources and properly functioning processes for responding to breaches of personal data protection, affecting the mitigation of the risk of negative consequences for a natural person. Details of this process are provided in section 19.9 *Remediation of negative impacts*. The goal is to reduce the risk of negative consequences of a breach of an individual's personal data protection rights.

All these activities will be continued in the coming years. The effectiveness of such measures is monitored and reported on a quarterly basis.

In planning its privacy protection activities, the Bank continuously monitors and analyses applicable legal regulations, evaluates potential threats, and adjusts the scope of its activities to current regulations and ongoing threats. Privacy is taken into account in the new products and services implementation process. Moreover, the Bank cooperates with industry organisations in communicating privacy and cybersecurity risks.

In the event of a security incident resulting in a violation of customer data protection, the Bank takes measures to reduce the incidence of such situations in the future. The measures applied are commensurate with the cause of the violation. In particular, they include educational activities, changes in processes and changes in IT systems.

The Bank monitors the level of incidents related to the processing of personal data, analyses the causes of incidents and implements mitigating measures to reduce their number in the future.

Bank Millennium has appointed a Data Protection Officer (DPO) to oversee the proper processing of data and data protection regulations.

In managing the broadly construed privacy process, the Bank has appropriate organisational structures in place, including departments whose goals and tasks are related to the area of ensuring the privacy of our customers' data: the Data Protection Department whose job is to provide advice, support and supervision of the fulfilment of obligations in the area of personal data processing, and the Security Department. The Bank provides resources for the operation of these units, in particular to cover personnel costs, costs of legal support, IT systems maintenance as well as operating expenses related directly to the functioning of these units. The costs associated with the implementation and maintenance of regulatory privacy requirements are incurred by business units performing the processes in which personal data are processed. The Bank considers the expenses incurred in connection with these activities to be significant operating expenses, but due to the complexity of the activities and their confidential nature, the Bank does not disclose any details in this respect.

19.5.4 Objectives related to the pursuit of policies and activities

[S4-5] The goal of our privacy activities is to ensure a top level of customer data security and minimise the risk of potential data violations. All information provided by our customers is protected using state-of-the-art technologies, in accordance with applicable legal standards, security requirements and principles of confidentiality.

The effectiveness of our activities related to customer data privacy is monitored using KPIs:

- Number of incidents
- Number of incidents reported to UODO
- Number of complaints to UODO
- Number of UODO decisions against the bank
- Percentage of late responses to UODO's claims and other letters
- Number of late responses to demands from data subjects
- Percentage of employees trained in personal data protection

The Bank is actively developing its privacy and customer security systems by rolling out new organisational and technical safeguards.

The above strategic objective is not a target within the meaning of ESRS (MDR-T).

19.6 Access to (high-quality) information

19.6.1 Policies related to access to (high-quality) information

[S4-1] Bank Millennium has a range of internal regulations designed to ensure that documents prepared for customers and the information contained therein are reliable, transparent and compliant with applicable law. The Bank uses multi-level verification tools, which limit risk and potential negative impacts on consumers arising from inadequate information about offered products and services. Every new or modified product or service in the Bank, regardless of which customer group it is aimed at, is subject to the guidelines of the *New Product and Service Approval Policy* and lower-level documents.

The *Policy* defines the general rules and procedures applicable to the marketing of new and modifications to existing products. The scope of the document includes:

- preparatory process for the introduction of a new product, implementation of a new service, introduction of significant changes to existing products and services, etc.,
- opinion and approval process, which is carried out in cooperation with the Risk Department, the Compliance Department, the Legal Department and other units that are relevant to the product or service,
- process for setting product prices.

Lower-level documents clarify the rules of conduct for the *Policy* – they define the procedures and rules applicable in Bank Millennium when marketing new and modifying existing products and services. They include:

- details of the preparation and consultation process for the marketing of a new product or modification of an existing product, including an analysis of compliance with the Bank's *Strategy 2028*, an analysis of compliance with regulatory requirements, and the identification of opinion-giving bodies for specific products,
- details of the review and decision-making process for the marketing of a new product or modification of an existing product,
- reporting principles,
- process of taking action after obtaining approval to implement a change,
- details of the process of making changes to the price list of services,
- preparation and approval of marketing communication plans and budget,
- information on the responsibilities of the unit requesting the marketing of a new product or modification of an existing product, and references to any other internal regulations of the Bank – specific to the product group.

The *New Product and Service Approval Policy* and lower-level documents are internal documents applicable to all of the Bank's products and services targeted at both retail and corporate customers. A review of the documents is conducted annually. The Bank's Management Board is responsible for approving, implementing and modifying the *Policy*. The Legal Department is responsible for the ongoing monitoring of changes in legal regulations and for informing the Bank's organisational units about them. The Compliance Department monitors the process of adjustment activities in response to regulatory changes affecting the Bank. The *New Product and Service Approval Policy* is a document falling within the area of responsibility of the Retail Banking Marketing Department, which is responsible for its implementation and keeping it up to date.

Each quarter, a report of the Compliance Department is prepared and presented at a meeting of the Bank's Management Board and the Supervisory Board Audit Committee. The report includes information on the most material regulatory changes identified in the respective quarter, relations with regulators (including the Office of Competition and Consumer Protection, the Polish Financial Supervision Authority and the Financial Ombudsman), as well as information on instances of compliance risk identified by the Compliance Department – both with generally applicable regulations and with the guidelines of the indicated regulators.

The Bank's employees, while serving retail customers, are required to follow the guidelines set forth in the *Book of Customer Service Standards for the Retail Segment*. The document organizes and structures processes related to customer service and product sales. It also supports the development of high-quality customer service, establishment of relations with customers and ensures the provision of transparent and reliable information to customers about the Bank's offerings.

The guidelines in the *Book of Customer Service Standards* and in *Client Call Scripts* obligate employees to do the following in particular: identify customer needs, present the Bank's offering clearly and accurately, discuss the rules on how the product works, present cost information, diagnose customer doubts, provide explanations and ultimately – confirm that the rules on how the product works are comprehensible to the customer prior to signing an agreement and the solution offered addresses his or her needs.

We attach great significance to the quality of customer service, including the quality of information provided to customers. Our employees are further supported in this by *Client Call Scripts* for everyday banking products, credit products or savings and investment solutions. These scripts have been in operation for several years and are updated regularly to address the changing market trends, regulations and client needs. Any change to the script/standard is accompanied by implementation among frontline customer service staff and training. All the changes made to *Call Scripts* centre on ensuring complete transparency in terms of the information provided and customer education so that they can benefit from the services offered by the Bank with full awareness.

We develop *Client Call Scripts* and *Book of Customer Service Standards* based on detailed analysis of customer opinions. We take into account different needs, barriers and types of customers to address their expectations in the best possible way.

The Quality Department is responsible for developing, monitoring and implementing the *Book of Customer Service Standards* and *Client Call Scripts*. The documents are approved by the Management Board Member overseeing a given business line. Each script and the tools used in working with customers are subject to review by the Compliance Department and Legal Department at the moment of their implementation or update. The implementation of activities in accordance with the *Book of Customer Service Standards* and *Client Call Scripts* is monitored through regular mystery shopper studies.

The principles described in the above documents enable effective management of the identified impacts: the actual positive impact resulting from taking numerous measures to ensure that customers have access to accurate information about product offerings in all sales channels, and the potential negative impact related to insufficient information provided to retail customers. They also support the management of risk resulting from increasing consumer protection requirements.

Bank Millennium's commitments to respect human rights, including with regard to access to high-quality information, are presented collectively for all relevant impacts in section 19.3. *Respect for human rights in customer relations*.

19.6.2 Customer engagement processes in terms of access to information

[S4-2] When marketing a new product or making changes to an existing product, the Bank cares that it is tailored to the needs of its users. The extent, to which the product matches client expectations is monitored in particular by monitoring the sales process and analysing complaints and claims made by customers.

Detailed information on general customer engagement processes can be found in the section 19.2. *General customer engagement processes*.

19.6.3 Measures related to access to information

[S4-4] Measures related to the provision of transparent and clear information to customers place a strong emphasis on compliance of documentation and customer service rules with all applicable regulatory requirements. Accordingly, we conduct numerous activities in this regard.

Key activities related to transparent and reliable communication with customers include:

- Detailed review and approval of products and services in accordance with the guidelines of the *New Product and Service Approval Policy* and the *Products and Services Rollout Instructions*. This applies to each new or modified product and service of the Bank. As part of this process, the Compliance Department verifies the compliance risk of the proposed product or service and the reputational risk, in particular, compliance with the requirements to provide potential customers with adequate information before signing the contract, obligations in terms of the contract and service regulations, information obligations during the provision of the financial service, and areas of potential conflicts of interest. Only products and services that have received positive feedback from the units required in the opinion process in accordance with the Policy and Instructions (including, mandatorily, the Compliance Department) may be processed further.
- Ongoing monitoring of regulatory progress to identify changes and implement them in the Bank's internal rules. Ongoing regulatory monitoring and updates are supervised by the Legal Department and the Compliance Department. Each month, the Legal Department prepares a newsletter containing draft or final versions of commonly applicable regulations from the Bank's area of interest published in the respective month. Each month, the Compliance Department prepares a newsletter containing drafts or final versions of guidelines of the regulators – European Banking Authority (EBA), European Securities and Markets Authority (ESMA) and European Insurance and Occupational Pensions Authority (EIOPA) – published in the respective month. Each quarter, a report of the Compliance Department is prepared and presented at a meeting of the Bank's Management Board and the Supervisory Board Audit Committee. The report includes information on the most material regulatory changes identified in the respective quarter, relations with regulators (including the Office of Competition and Consumer Protection, the Polish Financial Supervision Authority and the Financial Ombudsman), as well as information on instances of compliance risk identified by the Compliance Department – both with generally applicable regulations and with the guidelines of the indicated regulators.
- The application of service and sales standards (which include *Book of Customer Service Standards* and *Client Call Scripts*), and consequently the provision of clear and understandable product information to customers in all sales and retail customer service channels.

All the employees responsible for providing customers with information are properly trained as required by the law, sectoral regulations, best practices and quality standards implemented by the Bank. Bank employees are informed on an ongoing basis about any significant changes in sales and customer service, which is done through the Bank's various internal communication channels. The product sales process is executed on the basis of standardized models making it possible to present an offer to customers that is adjusted to their needs and expectations with options that may be of interest to them, along with the information necessary to make an informed decision about the scope of the given product purchased.

The implementation of service and sales standards in sales units, including sales ethics, is carried out through introductory training, classroom and e-learning training, and post-implementation activities conducted by designated people and units, including supervisors.

Compliance of customer service with the *Customer Service Standards* and *Call Scripts* is constantly monitored by the Quality Management Team – a unit specially established for this purpose within the Quality Department. The outcomes are communicated both to the Bank's Management Board and to the direct superiors of the employees subject to evaluation, and are used to take pertinent remedial efforts across the Bank. Compliance with standards is also monitored independently of the Bank, based on various types of service quality rankings, to which we attach great importance and take into account all conclusions drawn from them, as

evidenced by the high customer ratings for the Bank's service quality. We are leaders in customer experience – both among retail and corporate customers.

In 2025, Bank Millennium was recognized in the most important quality rankings. It won awards for quality of service in the areas of retail, high net worth, and business clients:

in the ranking Newsweek's Friendly Bank:

- first place in the Traditional Banking category,
- first place in the Remote Module category;

in Forbes magazine's Company Friendly Bank ranking:

- first place in the Bank for Affluent Clients category,
- podium in the Business-Friendly Bank category;

in the Golden Banker ranking:

- the title of Golden Bank 2025 for the best quality of multi-channel services,
- first place for the highest quality of the hotline service,
- podium for the highest quality of the chat and email service.

in the Institution of the Year ranking, Bank Millennium was awarded in seven categories:

- The best service in remote channels,
- The best process for opening an account at the branch,
- The best mortgage service at the branch,
- The best bank for businesses,
- The best mobile app,
- The best online banking,
- The best service at the branch.

In the Institution of the Year ranking Bank Millennium also received an individual CX Leader award.

The measures described in this section support the positive impact of numerous initiatives aimed at ensuring that customers have access to reliable information about the product range across all sales channels. Furthermore, they are undertaken in order to mitigate risks in the area of increasing consumer protection resulting from the actions of regulators on the local and European markets, as well as the negative impact of inadequate customer information.

When planning activities to ensure access to high-quality information, the Bank monitors and analyses applicable laws on an ongoing basis, assesses the regulatory environment, and tracks the results of customer service quality surveys and external audits, including rankings prepared by independent institutions and the media. At the same time, it conducts its own research on service quality and customer satisfaction. The information obtained is taken into account both in the implementation of new products and services, as well as in customer service models.

These activities will be continued in the coming years. The effectiveness of such measures activities is monitored and reported by the units responsible for verifying their performance.

Monitoring and evaluation of the effectiveness of the measures implemented is carried out as part of the Voice of Customer (VOC) programme, which enables the analysis of customer reports, including those concerning access to information. The aim of the programme is to identify and eliminate potential irregularities. The details of the notifications are consulted with the process or product owners and the relevant departments in order to eliminate any irregularities and introduce the necessary changes to the processes.

Processes related to marketing, sales, and data use are carried out in accordance with applicable laws, including regulations concerning financial products and services. As a result, the Bank's practices did not cause or contribute to any significant negative impact on consumers.

In the area of mitigating risks related to enhanced consumer protection, the key units involved in this process are the business owner of the product or service, the Compliance Department and the Legal Department. In the area of mitigating the negative impact in the form of insufficient information to customers as well as supporting the positive impact resulting from the numerous activities related to ensuring that customers have access to reliable information, in addition to the said units, the Quality Department is also involved.

The Bank has put in place appropriate organisational structures to effectively manage the identified impacts and risks and provides resources for the operation of such structures. The Bank considers the

expenses incurred in connection with these activities to be a significant part of its operating expenses, but due to the complexity of the activities and their confidential nature, detailed data in this area is not disclosed.

19.6.4 Objectives related to the pursuit of policies and activities

[S4-5] Transparent, reliable, and understandable communication with our customers is the foundation of our activities. Our ambition is to ensure full compliance with the law, a goal that is not measurable. The development strategy adopted by the Bank is based on early identification and minimization of potential risks and ensuring regulatory compliance.

We continuously applied this approach in 2025 and intend to continue it in the coming years. In the *Strategy for 2025-2028*, “*Strategy 2028 – Value and Growth*” (*Strategy 2028*), we have included the areas described below that support the Bank’s strategic development:

- Minimizing legal risks and ensuring compliance with regulatory requirements (WIBOR transit to another benchmark, foreign currency loans, AML, KYC).
- Mitigating risks in the area of consumer protection.

Bank is constantly monitoring changes in legal regulations as well as providing ongoing supervision over contractual documentation used by the Bank. Therefore, we actively and effectively participate in sector initiatives (information campaigns) and in dialogue with regulatory authorities. At the same time, we focus on early identification of the potential impact of regulatory changes, which allows us to define appropriate implementation projects.

In line with the *Strategy 2028*, our goal is also to strengthen customer experience (CX) management in order to increase customer satisfaction and maintain our position in the TOP3 of the Net Promoter Score (NPS) survey results in the retail and corporate customer segments. A crucial component in this area is ensuring the high quality of information provided to customers.

In 2025, we achieved this goal – in the area of retail banking we maintained our second place in the NPS survey compared to the baseline value from 2024 and in the area of corporate banking, however, the Bank maintained its leading position, as it did in 2024.

The above objectives relate to the management of impacts and risks in the area of providing adequate information to customers, but do not constitute targets within the meaning of ESRS (MDR-T). They have been included in the *Strategy 2028*. Their implementation is monitored on an ongoing basis, and the results are reported to the Bank’s Management Board on a quarterly basis. The Bank did not cooperate directly with customers in defining them.

19.7 Responsible marketing practices

19.7.1 Policies related to responsible marketing practices

[S4-1] Bank Millennium has adopted internal regulations setting out the rules for devising information and advertising materials. These regulations precisely define the steps that the Bank must take when preparing and publishing marketing materials for customers. This helps achieve a positive impact related to providing clear and understandable information about the Bank’s products and services.

Instruction – rules for devising information and advertising materials for banking products and services in Bank Millennium S.A.

The *Instruction* lays down the rules for devising materials on products and services offered by the Bank (excluding financial products and instruments), which are targeted at the Bank’s customers or potential customers. The document is designed to ensure that the materials prepared comply with the applicable laws and internal regulations. The *Instruction* are approved by the President of the Bank’s Management Board.

The document defines the process of preparing information and advertising materials targeted at the customer through the types of communication with the customer adopted by the Bank, including through electronic banking channels and means of remote communication. It covers the duties of the unit preparing the materials, the process of providing opinions and granting approval. It defines the principles of reliability and completeness of the information contained in the materials, information on fees, commissions and non-monetary benefits, or comparison of products.

Instruction – rules for devising materials, including commercial publications on products and financial instruments in Bank Millennium S.A.

The *Instruction* lays down the rules for creating materials on products and financial instruments targeted at the Bank's customers or potential customers. The document is designed to ensure that the materials prepared comply with the applicable laws and internal regulations. The *Instruction* are approved by the President of the Bank's Management Board.

The document specifies in detail how the materials should be prepared, taking into account the general principles of the standard of information and the manner of its communication, comparisons of offerings, indication of past performance and simulation of future performance. It also defines the method of presentation of information about fees. It covers financial instruments within the meaning of Article 2 of the Act of 29 July 2005 on Trading Financial Instruments, and financial products, including structured and combined products.

We strive to ensure that all information and advertising materials prepared by Bank Millennium comply with applicable laws and regulations in this area, in particular with:

- *Recommendations laid down by the Code of Ethics in Advertising* developed by the Advertising Council and the Advertising Ethics Commission,
- *Principles for Advertising of Banking Services of 2008* laid down by the Polish Financial Supervision Authority,
- *Best Practices on consumer loans advertising standards of the Polish Bank Association of 2015*,
- *Consumer Credit Act of 12 May 2011*,
- *Act of 23 March 2017 on Mortgage Loans and Supervision of Mortgage Brokers and Agents*,
- *Act of 29 July 2005 on Trading Financial Instruments*.

Bank Millennium's commitments to human rights, including responsible marketing practices, are presented collectively for all relevant areas of impact in section 19.3. *Respect for human rights in customer relations*.

19.7.2 Measures related to responsible marketing practices

[S4-4] In the process of developing marketing communication we adhere to the following recommendations and principles: the Bank's advertisements are not misleading and show the important features of the products and services and related benefits and costs. They also depict their legal nature of the products and services and provide information about the level of possible risk carried by the customer. If the message pertains to a promotional offer, its conditions are specified. Customers are also advised on where they can obtain detailed information about a particular product, service or promotion.

Any change or introduction of a document or marketing material for buyers of respective products is preceded by consultations within the Bank, verification by the product, legal and compliance teams, in order to provide customers with a clear and reliable, legally-required information about the products offered. Implementation of the marketing communication standards reduces the reputation risk and the risk of sanctions for non-compliance with the regulations.

Monitoring of activities in the area of reliable marketing communications is carried out as part of the compliance function exercised by the Compliance Department. This process is carried out on the basis of *Bank Millennium S.A.'s Compliance Policy*. Its provisions include a description of the instruments used to manage compliance risk, including with respect to responsible marketing practices. These instruments include monitoring of products, collection of data on incidents, assessment of compliance risks and controls, key indicators and risks, analysis of customer complaints and complaints to supervisory authorities, results of internal audits involving the discovery of irregularities. The results of Bank product monitoring endeavours are reported quarterly to the Bank's Management Board and the Supervisory Board Audit Committee. The above activities are being carried out continuously and will continue in future years as well.

The Bank has a Marketing Communications Department whose task is to develop and prepare information and advertising materials in accordance with the provisions of the instructions listed in section 19.7.1 *Policies related to responsible marketing practices*, in cooperation with other organisational units of the Bank. The Department employs individuals with experience and specialist expertise in the field of marketing communications. Units from the areas of product, compliance, and

legal also participate in the process of reviewing advertising materials. The Bank provides resources to ensure the proper functioning of these units.

19.7.3 Objectives related to the pursuit of policies and activities

[S4-5] As a public trust institution, the Bank bases its activities on providing customers with reliable and transparent information about its offer, including marketing communications. Our ambition – unchanged over the years – in this regard is to ensure full compliance with the law. This objective is not measurable and does not constitute a target within the meaning of ESRS (MDR-T).

In 2025, we successfully pursued our ambition of responsible marketing practices.

We are taking steps to strengthen our position as a leader in customer experience (CX), in which transparent and understandable marketing communication plays an important role. As part of the implementation of our *Strategy 2028*, we aim to increase the number of active retail customers to over 3.7 million by the end of the current strategic cycle (by the end of 2028) and to be the main bank for 70% of them³³, which requires the use of responsible and reliable marketing practices.

In 2025, our active retail customer base grew to 3.27 million, and we were the primary bank for 61.6% of our customers. These figures refer to 2024, when we had 3.13 million active retail customers and the ratio of customers with their primary banking relationship with us was 60.7%.

The Bank did not cooperate directly with customers in the process of defining objectives for transparent information about banking products, including through marketing activities.

19.8 Non-discrimination (inclusive banking)

19.8.1 Policies related to non-discrimination

[S4-1] In Bank Millennium, we operate in accordance with the provisions of the *Social Impact Policy* and the *Diversity Management Policy*. These documents support activities related to non-discrimination, including in the area of relations with all of the Bank's customers.

In accordance with our *Social Impact Policy*, our direct commitment to the *United Nations Sustainable Development Goals* is reflected in strategic activities oriented toward finding innovative and inclusive (anti-exclusion) products and distribution channels and in our approach to customer service. The *Policy* indicates our areas of commitment to customers, including those oriented to the search for innovative and inclusive (anti-exclusion) products and distribution channels and in our responsible approach to customer service and respect for human rights.

Our *Diversity Management Policy* is aimed at promoting a culture based on mutual respect, identifying diversity, ensuring equal opportunities, preventing exclusion and avoiding discrimination. The document defines our commitments in the area of respect for diversity and equal treatment.

Both documents form an integral part of the Bank's *Policy on Sustainability Principles of Bank Millennium S.A.*, which is implemented under the responsibility of the Bank's Management Board. The Sustainability Department is responsible for reviewing and updating the *Policies*.

Monitoring of the principles described in these documents with regard to customers is carried out using Voice of Customer (VOC) customer analysis tools, which enable ongoing monitoring of activities and evaluation of their effectiveness.

Commitments to respect human rights at Bank Millennium, including in the area of non-discrimination, are presented collectively for all relevant impacts in section 19.3 *Respect for human rights in customer relations*.

19.8.2 Measures related to non-discrimination

[S4-4] At Bank Millennium, we make sure that each customer is served in a manner tailored to their individual needs and expectations. Employees and designed solutions help customers comfortably "bank" and use various services at a time and pace that suits them. We are working to maintain the synergy between the digital message and the traditional form of customer contact with the bank.

³³ **Customers with a primary relationship with the bank** – customers who use Bank Millennium as their primary bank and meet specific transaction thresholds, product penetration and portfolio value thresholds. We monitor the percentage growth on a quarterly basis.

The Bank is taking steps to remove infrastructural, digital, and physical barriers to accessing financial and non-financial services by implementing solutions based on state-of-the-art technologies.

We are taking measures aimed at digitizing customers in various areas. Electronic banking channels cooperate closely with traditional channels. We are aware that many customers begin their relationship with the bank at a branch, and we treat it as a key place where they learn about the possibilities offered by mobile and internet banking. Employees play an important role in this process and are given appropriate support through regular meetings and webinars, including as part of the Digital Ambassadors programme.

For Bank Millennium, it is crucial not only to digitize new users, but also to activate those less involved. The digitalization path is not identical for every customer, which is why we tailor it based on analysis of activity and preferences, while communications are sent in real time. After activating access to digital channels, we familiarize customers with the opportunities offered by such channels, educate customers on the principles of cybersecurity and support them in the process of selecting the Bank's products and services, e.g., using a contextual contact panel or screen sharing, which we also made available in the mobile app in 2025.

To ensure a consistent user experience across our contact channels, we are building a support ecosystem that combines technology (e.g., automated chat) with easy contact with a Bank employee. This combination provides customers with comprehensive support in a form that is convenient for them and meets their current needs.

Customers taking their first steps in the area of digital banking have the following site at their disposal: www.bankmillennium.pl/en/firststeponline.

Digitization also means ensuring the availability of basic services through digital channels so that customers can place orders themselves, at a time that suits them best and without having to visit a branch. We are transferring more processes to digital channels (e.g., updating personal data, ordering cash to a selected Bank branch) and are constantly improving existing processes. In 2025, we added a new identity verification path when opening an account in the mobile app. Customers can now use the improved "selfie" option or choose to confirm their details in the mObywatel app.

The Bank's customers may use mobile devices and computers to access our services, but also a number of additional solutions, such as in the mobile application, customers may purchase public transportation and parking tickets. The electronic banking system also allows customers to use digital identity and engage in remote contact with Polish government offices. We provide the Millennium ID identity verification service, which is based on the myID solution. Customers can also submit official applications via the Bank's digital channels (Family 800+, Good Start 300+, Active Parent, application for benefits for people with disabilities, application to set up a sole proprietorship, mandatory SIM card registration).

The Bank has prepared a special version of the mobile application available to children aged 7 to 12. This app is not only a helpful gadget, but it is also a tool to introduce children to the world of finance and use technology safely. During activation the application recognizes the user and adapts the version to his or her age. The app is friendly to the youngest users and it was designed together with them – it has a simplified menu, children-friendly language and a made-for-children design. At the same time, it gives parents total control over a child's spending, special transaction limits and the option for the parents to block a card using their application. The app grows with the child. After turning 13 years of age, the version of the app installed in the phone automatically changes to the currently available version adapted to people up to 18 years of age.

In addition, our hotline operates 24 hours a day, giving customers unlimited access to information. This is particularly important for customers who work irregular hours, are abroad, or have special needs.

We continue our efforts to improve customer satisfaction, including in the areas of communication transparency and language simplification. We are changing the texts provided to customers from account opening to information on handling their products.

We have also entered into an agreement introducing a uniform standard of language clarity in retail banking services. This joint initiative by the banking sector confirms the sector's shared approach to the statutory obligation to ensure language comprehensibility at the B2 level. In 2024, we obtained a plain Polish certificate for responding to complaints.

We are making more and more of our documents available in accessible PDF format so that they can also be read by screen readers and other assistive technologies. We are constantly working on new ones so that everyone can read and use them comfortably.

We prepare and train our employees to create documents in simple language and accessible formats. We have developed guidelines, provided tools for verifying document accessibility, and are constantly creating educational materials that support everyday work with documents. This makes accessibility part of content creation – right from the first draft of a document.

We are striving for all our customers, including those with disabilities, to have convenient access to services. We are constantly working to eliminate digital and physical barriers to accessing our products and services. Many of our facilities have wheelchair access. We strive to remodel the facilities with architectural barriers as much as possible in order to eliminate them. All of our establishments have seated customer service desks with ramp access for people using wheelchairs.

We are working on facilities for the blind, visually impaired, deaf and wheelchair users, such as:

- elevators and ramps in those Bank branches where their use is possible,
- new signage for internal and external glazing and differences in levels inside facilities so that they are visible to visually impaired people,
- introduction of an online Polish Sign Language interpreter in facilities and on the helpline,
- developing a new model of self-service Internet kiosk for customers (Millenet Kiosk) so that wheelchair users have easy access to them,
- “blind notch” solution in Millennium 360° debit cards, which consists of a semi-circular cutout on one of the sides. The solution is conceived as a convenience for the visually impaired and blind. The cutout makes using the card, for example when withdrawing from an ATM, much easier.

Bank Millennium’s website, the Millenet internet banking system and the Bank Millennium mobile app are continuously being adapted to meet the needs of blind and visually impaired individuals. A visually impaired user can use the website with a keyboard - the mouse is not needed to navigate the portal.

Moreover, the site has a text zoom feature and is designed for high-contrast reading. Also, our mobile app is adapted to the needs of blind and visually impaired people owing to its compatibility with access-enhancing services such as Google TalkBack (Android) and VoiceOver (iOS) that enable the presentation of information using speech.

We have also developed a special procedure for serving blind or visually impaired customers at our branches. We have equipped our facilities with tools and materials for blind people.

All of Bank Millennium’s own ATMs are adapted to the needs of people with disabilities. Disabled people with movement impairments can use ATMs and deposit machines fitted with a numeric keypad instead of function buttons next to the screen, which means that they do not have to reach too high. In addition, ATM’s number keypad makes it easier to use the device also by disabled people with vision impairments. After headphones are connected to the ATM, the user may enter instructions through voice messages. Additionally, people with vision impairments may use a special black and white screen mode which enhances contrast and legibility of displayed messages.

In 2025, as part of the “Accessibility” project, which systematizes our approach to assessing and improving accessibility in accordance with the requirements of the Accessibility Act, we published a summary of the accessibility status of our services. You can find them on our website in the *Barrier-Free Banking* section (direct link: www.bankmillennium.pl/en/barrier-free-banking). We have also developed a phased remediation strategy for each identified deficiency, which guarantees continuous improvement and progress in our activities over the next three years.

We carry out these measures continuously and we keep developing them based on audits conducted by external partners from the NGO (non-governmental organisation) sector. In 2025, we conducted audits covering, among other things, the areas of digital processes for the current account, customer onboarding, electronic banking navigation, debit cards and credit cards. After each audit, areas requiring additional measures to improve accessibility are identified.

In the area of digital banking, we have developed general accessibility standards for teams involved in the design and implementation of new solutions (UX/UI designers, UX writers, developers, testers). A knowledge base and accessible design guide have been prepared, and Bank employees have undergone a series of internal and external training courses to learn about WCAG 2.1 guidelines and guidelines for preparing accessible documents. The Bank has developed accessibility checklists, which are used during the implementation of projects in remote channels. Additional support for designers and developers is provided by the Quality Assurance and Design Standards Team, which continuously analyses new implementations and helps improve the accessibility of existing processes in digital channels. Employees across the entire sales network have completed specialized training in serving

customers with special needs. With the help of external partners, we have developed service standards to better respond to the diverse needs of our customers. Thanks to these measures, every employee in the network is now fully prepared to provide professional service to people with various types of disabilities.

Various units of the Bank are involved in these activities, including: the Digital Customer Experience Department, the Retail Digital Banking Department, the Quality Department, the Processes and Project Management Department, and the Sales Support Department.

The Bank provides resources for the implementation of measures related to the accessibility of services. Due to the complexity of the activities and their location in various units and processes, expenditure for this purpose is not disclosed.

Cooperation with customers regarding complaints and claims is described in the section *19.2 General customer engagement processes*.

19.8.3 Objectives related to the pursuit of policies and activities

[S4-5] Our ambition is to offer products and services that help combat social exclusion, including by providing support to people with limited access to digital banking solutions and by promoting access to financial products. The objective in this area is not measurable and does not constitute a target within the meaning of ESRS (MDR-T).

Supporting people with special needs in using banking services and helping customers navigate the digital world are long-standing activities of the Bank, which are continued as part of the current *Strategy 2028*. One of our goals is to achieve a level of 95% digitally active customers by 2028. In 2025, 93.7% of customers were digitally active – we refer to this figure in relation to 2024, when it stood at 92.9%.

Our ambitious goal is to provide convenient access to financial services for all customers, including people with disabilities. We promote a culture based on mutual respect, acceptance of diversity, equal opportunities, and counteracting exclusion and discrimination. Although this goal cannot be expressed in numbers, we make every effort to ensure that any potential violations of these principles are detected and any damage is properly remedied.

We monitor the progress of initiatives aimed at increasing the availability of banking services and products and supporting the prevention of social exclusion. We monitor efficiency and evaluate the actions taken based on an analysis of customer opinions collected as part of satisfaction surveys conducted by the Bank, as well as through ongoing monitoring of reports under the Voice of Customer (VOC) programme, described in detail in section *19.2 General customer engagement processes*. Progress in implementing the strategy, including measures to combat discrimination, is reported on a quarterly basis.

Representatives of the Bank actively participate in the work of the Polish Bank Association on accessibility. When defining objectives related to social inclusion and non-discrimination, we drew on knowledge gained from interviews and our customers' experiences from visits to institutions, as well as from discussions held in cooperation with the Polish Bank Association and external partners from the NGO sector.

19.9 Remediation of negative impacts

[S4-3] All matters relating to remedying the negative effects at Bank Millennium are governed by internal documents, i.e., product regulations and the *Complaints Handling Instructions*. The instruction defines the rules and procedures for handling complaints and claims, which are the responsibility of the Client Relations Department in the Quality Department. The purpose of the internal regulations implemented by the Bank is to ensure compliance with the *Act on Complaint Examination by Financial Market Entities, on the Financial Ombudsman and on the Financial Education Fund, on the Payment Services Act* and the *Act on Ensuring Compliance with the Accessibility Requirements for Certain Products and Services by Business Operators*.

Customers may submit complaints through various channels of contact with the Bank, according to their preferences and capabilities: at a branch, by telephone, via electronic banking, by email, by e-delivery address, or by post.

All reports – from both individual and corporate customers – are recorded in the central MilleResolver system, which is used to log and handle them. The system automatically assigns the reports to the appropriate teams, employees, or robots supporting the process at selected stages.

An employee verifies the report, confirming or correcting its categorisation, type, and source. If necessary, they ask a query to the relevant unit responsible for the implementation and development of the given product or service. Based on an analysis carried out, they provide the customer with a response within the time limits specified by law.

At the same time, we are taking steps to reduce the time it takes to process complaints, which increases customer satisfaction. We are constantly introducing changes to optimize our work. In the process of handling complaints, we use and develop machine learning tools. Thanks to improvements, automation, and the introduction of new solutions, we are not only reducing response times, but also improving the quality of our responses.

The complaint handling process is closely monitored through the analysis of key performance indicators (KPIs, KRIs). This allows us to assess the effectiveness of our efforts in various areas, such as service time, number of complaints, costs, and how issues are resolved. These indicators play an important role in monitoring progress toward business objectives and ensuring high-quality customer service and effective complaint management. They also allow for quick identification of areas requiring improvement and appropriate corrective measures.

We evaluate the effectiveness of our actions based on customer satisfaction surveys, which allows us to continuously improve our processes. In 2025, we conducted a satisfaction survey in the area of complaints, which concerned the process of submitting complaints to the Bank, including an assessment of its accessibility and ease of use. We plan to conduct the survey on a regular basis.

In the event of a personal data breach, the customer also has the option of reporting the incident directly to the Data Protection Officer. The Bank is obliged to provide the customer with information in accordance with the deadlines specified by law and makes every effort to respond to inquiries as quickly as possible.

In the event of a personal data breach, the general rules of conduct are set forth in the *Personal Data Security Policy*, as described in more detail in section 19.5 *Privacy*. Moreover, the *Security Incident Handling Procedure* describes detailed rules for handling information security incidents, including as a result of cyber threats – described in more detail in section 19.4 *Safety of deposited funds*. The procedure covers the identification, reporting, analysis, corrective actions and closure of incidents, including those related to privacy and loss of safety of deposited funds.

When it comes to privacy reports, it is crucial to respond quickly while exercising the utmost care in analysing each incident. All cases, even potential ones, are forwarded to a team operating on a continuous basis (24/7), and then – if they concern the processing of personal data – are referred to specialists in the field of personal data protection. Based on the analyses conducted, the Bank continuously improves the security measures it uses. In the event of a breach of personal data protection for which the Bank acts as the Controller, the Data Protection Office assesses the impact of the incident on the rights and freedoms of individuals. If there is a risk of infringement of the rights and freedoms of a natural person, the Bank reports the infringement to the Personal Data Protection Office and, in certain cases, also the data subject, in accordance with the requirements of Articles 33 and 34 of the GDPR, in the manner and within the time limits specified in those provisions. In the event of incidents involving identity theft, the Bank cooperates fully with the relevant law enforcement authorities.

All Bank Millennium employees are bound by the *Code of Ethics*, compliance with which protects customers from possible retaliatory measures in connection with complaints or claims.

20. Business conduct (ESRS G1)

[G1 IRO-1] The process of identifying material impacts, risks and opportunities in the area of corporate governance was conducted in accordance with the methodology adopted by the Bank and described in section 15.4. The criteria used in the process took into account the specifics of the Bank's banking and leasing activities in Poland, including the laws and regulations applicable to the Group, as well as the significant impacts, risks and opportunities previously identified by the Group or its parent company.

We conducted the double materiality assessment for the first time in 2024, and the review of the double materiality assessment process carried out in 2025 featured the methodology update and entailed a re-analysis of all impacts, risks and opportunities and their assessment. The results of the update were approved by the Bank's Management Board and presented to the Supervisory Board Audit Committee.

In the process of identifying impacts, risks and opportunities in the corporate governance area, we identified four material impacts in the areas of: corporate culture, whistleblower protection, and corruption and bribery. We did not, however, identify any material risks or opportunities in this regard. The criteria used in this process are described in more detail in section 15.5 *Double materiality assessment*.

IRO Type	Material impact, risk or opportunity – description	Upstream	Own operations	Downstream	Short term	Medium term	Long term
		Place in the value chain			Time horizon		
ESRS G1 Business conduct							
Corporate culture							
Positive actual impact	Impact resulting from the principles of corporate culture implemented in our policies, procedures, rules and regulations, and embedded in all processes within the Group		●		●		
Whistleblower protection							
Positive actual impact	Impact related to the whistleblower protection procedures in place and the anonymous channel for reporting violations		●		●		
Corruption and bribery							
Positive actual impact	Impact related to anti-corruption measures taken	●	●		●		

- The Bank Millennium Group's corporate culture includes commitment to both social and environmental issues. The Group's stakeholders, including employees, are guaranteed transparency regarding the adopted principles of conduct and regulations taking into account sustainability matters.
- We ensure the possibility of anonymous reporting of suspected violations; therefore, the Group guarantees the protection of whistleblowers and a system of diverse channels for submitting reports. Whistleblowers can act with the confidence that they face no risk of retaliation or other negative consequences for reporting suspected breaches of the law or the Group's internal principles.
- Preventing corruption and bribery is a pillar of effective corporate governance. The standards of conduct adopted in this respect, combined with, among others, education in this area and awareness-raising through channels available to both own and franchise employees, provide clarity on how to proceed in daily work, taking into account anti-corruption factors.

20.1 Corporate culture and business ethics

[G1 IRO-1] The Bank Millennium Group operates in a sustainable manner, while considering adherence to ethical principles to be of paramount significance for its corporate culture and business conduct. This follows from our mission as a financial sector operator and the Group's professed values, which we consider crucial. We build relationships based, among others, on trust, we support employee development and promote cooperation, guided by such principles as: compliance with laws and internal regulations, transparency, confidentiality and reliability.

The Group's operations are conducted based on a clear organisational structure, a transparent and documented division of responsibilities, and a comprehensive set of internal regulations and a training programme allowing employees to familiarize themselves on an ongoing basis with new or updated procedures and principles of conduct. The risk management area in the Group is organized in the same way.

Procedures and rules of conduct are available to employees (including franchise employees) in MilleTeka – the internal database of regulations in force at the Bank.

[G1-1] The fundamental document that governs key issues for the Bank Millennium Group is the *Bank Millennium Group Code of Ethics* – a set of principles implemented at the Management Board level and approved by the Supervisory Board, which must be observed by all employees of the Bank Millennium Group. The *Code of Ethics* contains principles and values that should guide employees in the performance of their duties and in the relations with their colleagues and with the Bank as an employer. It also sets out guidelines for relations with clients, the market and suppliers, referring to such areas as: respect for human rights, quality of service, ethical sales, fair competition and communication, focus on ensuring long-term continuity and sustainability, principles for conducting business relations, anti-money laundering, prevention of conflict of interest and anti-corruption, including rules on accepting and giving benefits, as well as participation in and organisation of tenders. The *Code of Ethics* also applies to franchisees and employees at franchise locations.

Every employee is required to become familiar with the *Code of Ethics*, complete a mandatory e-learning course in this respect, and to confirm their knowledge and apply the principles included in the *Code of Ethics* in daily work. The scope of the training covers, among others, conflict of interest management, anti-corruption, confidential information, personal transactions, and other topics. The knowledge and materials provided during the training are intended, among others, to sensitize employees on how to identify and handle situations which in any way may cause a conflict between the interests of Bank Millennium and the client, as well as how to handle information which is or may be price-sensitive and the disclosure of which might affect the price of financial instruments. Additionally, the scope of training also covers the discussion of specific issues related to our principles of conduct, including within separate e-learning courses such as, among others: "Counteracting corruption in the Bank Millennium Group", "Countering conflicts of interest", "Counteracting money laundering and terrorist financing and compliance with international sanctions". As part of such training, employees also learn what responsibilities (including legal orders and prohibitions) are associated with conflict situations and with coming into possession of confidential information. The role of employees as those who must adequately identify their own behavior as well as that of other employees and clients is highlighted in the examples. The above-mentioned e-learning courses make up a mandatory package of regulatory trainings that every Bank employee is required to undergo. Also, every newly hired employee of the Bank Millennium Group must complete them as part of the onboarding process, and subsequently participates in refresher trainings annually.

The Ethics Officer stands guard over compliance with the *Code of Ethics*. This function is exercised by the head of the Compliance Department. The tasks of the Ethics Officer, in addition to safeguarding compliance with the principles contained in the *Code of Ethics*, also include: promoting ethical standards, ordering inspections of compliance with ethical principles, as well as verifying cases of conduct inconsistent with the adopted principles. The *Code of Ethics* is subject to annual review and updates on an as-needed basis. The document may also be updated depending on current needs, supervisory recommendations or detected irregularities, in particular as regards adjusting to changes in the regulatory environment, changes in the profile and level of risk related to the Bank's activities, as well as factors of the economic and the environment in which we operate.

The *Code of Ethics* has been published on the Internet – among others at www.bankmillennium.pl/en/about-the-bank/esg – and on the Intranet (in the MilleTeka service available also for franchise employees).

20.2 Anti-corruption

[G1-1] The Bank has put in place various formalized policies for preventing, detecting, investigating and responding to allegations or incidents of corruption or bribery – these issues are governed by the following documents: *Counteracting Corruption in Bank Millennium S.A. Principles and guidelines* and *Anti-corruption Policy*, applicable to all employees of the Bank Millennium Group. Both these documents are consistent with the United Nations Convention against Corruption.

The document entitled *Counteracting Corruption in Bank Millennium S.A. Principles and guidelines* lays down the principles of conduct designed to prevent incidents of corruption and bribery, among others in relations with contractors and government employees as well as with other entities and organisations. The document also sets out the rules applicable to the acceptance and offering of gifts as well as participation in business-related or other events by Bank employees.

Counteracting Corruption in Bank Millennium S.A. Principles and guidelines identified the areas that, in the Bank's opinion, are the riskiest in terms of the possibility of the commission of corrupt acts. These areas include: relations with contractors, government employees and other external entities, the acceptance and offering of gifts, business and PR events. In principle, all employees may perform duties in the areas indicated, which means that the Bank takes into account the risk of exposure to corruption and bribery for each employee.

Counteracting Corruption in Bank Millennium S.A. Principles and guidelines has been implemented at the Management Board level and published on the Bank's Intranet site in the manner customary for such documents. Our approach to corruption is also communicated to business partners and all entities participating in the Bank's procurement processes, primarily through the Supplier Sustainability Guidelines available on our website at:

www.bankmillennium.pl/documents/10184/84831/Supplier_Sustainability_Guidelines.pdf. Bidders are required to submit a statement confirming their acceptance of these guidelines. Furthermore, the *Anti-corruption Policy* is available to business partners and other stakeholders on the Bank's website:

www.bankmillennium.pl/documents/10184/84831/Anticorruption_Principles.pdf.

Anti-corruption provisions are also embedded in agency agreements with franchisees and agreements with brokers. Additionally, these stakeholders are required to complete mandatory training in this area (for brokers, this happens before experts receive the authorization to process mortgage applications). On the other hand, the Compliance Department regularly publishes reminders on the Intranet regarding the obligation to observe ethical principles, including those related to anti-corruption.

[G1-3] The responsibility for counteracting corruption rests with all Bank employees, which means that they are required, in the event of suspicion that an act of this kind has been committed, to immediately inform the Compliance Department by sending a message to a dedicated e-mail box. The Bank also consents to such reports being submitted on a fully anonymous basis, from any email box other than that bearing the Bank's domain name, or in hardcopy form addressed to the Compliance Department, or to a selected employee of that unit.

If a corruption incident occurs, the Head of the Compliance Department is required to promptly bring the matter to the attention of the President of the Management Board and the Chairperson of the Supervisory Board, and then take action in cooperation with the relevant Management Board members to look into the matter, assess its potential unfavourable effects and take corrective steps, as well as decide on the consequences of the discovery of the corrupt activity. Then he or she takes action in cooperation with the relevant Management Board members to look into the matter, assess its potential unfavourable consequences, take corrective steps and decide on the consequences of revealing the corrupt activity. The Compliance Department – as the unit exercising the compliance function referred to in Article 3(1)(2) of the *Regulation of the Minister of Finance, Funds and Regional Policy on 8 June 2021 on the risk management system and internal control system, and compensation policy in banks* – operates independently from other units within the Bank. It has been vested with the authority and powers suitable for fulfilling the duties described above.

On a regular basis, the Head of the Compliance Department notifies the Management Board and the Supervisory Board Audit Committee of all identified instances of corruption (if any), both in its quarterly reports and in the annual report on the evaluation of the Bank's compliance system.

In order to prevent corruption in purchasing processes, the Bank has also introduced the principles of cooperation with Bank Millennium's suppliers, as laid down in the *Instruction for the selection of suppliers*

for procurement and outsourcing. This instruction defines, among other things, how the procurement process is organised, the roles played by its various participants and the supplier selection criteria. Suppliers are selected in tenders, which allows the Bank to use objective selection criteria. To ensure transparency of the procurement process, the substantive and commercial evaluations of bids are done by independent Bank units. Every supplier taking part in a tender procedure must undertake to observe the rules contained in the *Bank Millennium Group Code of Ethics*, including the respect of human rights and compliance with anti-corruption policies, by signing a representation to that effect. In addition, a clause confirming supplier compliance with the *Code of Ethics* has been included in currently concluded supplier agreements.

As part of the assessment of individual components of operational risk, also the aspect of vulnerability to corruption risk of different types of the Bank's activities is reviewed by the Internal Audit Department in the course of audit activities. Past experience in this area confirms the adequacy and effectiveness of the control mechanisms implemented for this purpose, such as procedures, segregation of duties, authorisations and limits.

The Bank also holds regular trainings on preventing corruption. They have been prepared as a separate group of annual courses for Bank Millennium employees and franchise employees and as a component of compliance training for members of the Bank's Management Board and Supervisory Board. The purpose of such trainings is to familiarise attendees with anti-corruption policy, potential causes and forms of corruption, areas at risk of corruption and ways of acting and behaving in special situations, for instance when accepting gifts or attending external events. Information on the percentage of employees who have not completed the training is provided periodically (quarterly) to the Bank's Management Board and the Supervisory Board Audit Committee.

Participation in anti-corruption training

	People at risk of corruption to whom training was assigned	People who completed the training	People who have not completed the training	Training in progress (deadline not yet expired)
Employees				
2025	7,355	6,800	404	151
2024	7,274	6,770	376	128
Percentage				
2025	100%	92.45%	5.49%	2.05%
2024	100%	93.07%	5.17%	1.76%
Of which employees in managerial positions				
2025	1,121	1,056	46	19
2024	1,139	1,076	50	13
Percentage				
2025	100%	94.20%	4.10%	1.69%
2024	100%	94.47%	4.39%	1.14%

Data in the table covers employees of the Bank and of franchise locations.

[G1-4] In 2025, as in 2024, no cases of corruption were detected in the Bank Millennium Group. Nor were there any cases of confirmed incidents in which employees were dismissed or disciplined for corruption, confirmed incidents in which agreements with business partners were terminated or not renewed due to corruption-related breaches, or public corruption-related litigation brought against the Bank or its employees. Also, no employees were convicted under court judgments, including fines, for violations of anti-corruption or anti-bribery laws.

20.3 Whistleblower reporting and protection

[G1-1] Bank Millennium has two whistleblowing processes in place. One pertains to reporting breaches under the *Whistleblower Protection Act of 14 June 2024 (Whistleblower Protection Act)*, and the other concerns reports submitted under other regulations (e.g., *the Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and on Public Companies, the Regulation of the Minister of Finance, Funds and Regional Policy of 8 June 2021 on the Risk Management System and Internal Control System as well, the Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC, Act of 1 March 2018 on counteracting money laundering and terrorist financing, or the Regulation of the Minister of Finance of 29 May 2018 on detailed technical and organisational conditions for investment firms, banks referred to in Article 70(2) of the Act on trading in financial instruments, and custodian banks*).

As part of the first process, any breaches of the law within the meaning of the *Whistleblower Protection Act* may be reported, that is various types of unlawful acts or omissions or those aimed at circumventing the law in the areas of corruption, financial services, products and markets, anti-money laundering and terrorist financing, product safety and compliance, environmental protection, consumer protection, protection of privacy and personal data, as well as security of networks and ICT systems. As part of this process, whistleblowing reports may be submitted by Bank employees, people performing work under a civil law contract, commercial proxies, shareholders, members of the Bank's Management Board, members of the Bank's Supervisory Board, people performing work under the supervision and direction of a contractor, subcontractor or supplier, apprentices and volunteers (during the course of their relationship with the Bank and thereafter). Reports submitted under the *Whistleblower Protection Act* are not anonymous.

As part of the second process, any breaches involving non-compliance with the law and the Bank's procedures or ethical standards may be reported. Whistleblowing reports under this process may only be made by Bank employees or members of the Bank's Management Board. However, reports obtained from outside the organisation will also be reviewed. Any employee in possession of information or a reasonable suspicion of a breach of the law, applicable policies, procedures or provisions of the *Bank Millennium Group Code of Ethics* is required to report such information promptly through any of the dedicated reporting channels. Such reports can be made anonymously or without anonymity by sending an e-mail to dedicated e-mail addresses or using the Sygnanet application, and by post – in a sealed envelope delivered by external mail marked as "breach report" and "for the attention of the addressee only", placed in another sealed envelope, addressed to the President of the Management Board or the Chairman of the Supervisory Board Audit Committee (if the breach concerns a Member of the Management Board) to the address of the Bank's registered office.

The rules governing these processes are laid down in internal regulations, such as: *Instructions for reporting breaches in Bank Millennium S.A. (Instructions for reporting breaches, Instructions)*, and the *Rules governing reporting breaches to Supervisory Board in Bank Millennium S.A. (Rules)*. Both these documents have been uploaded to the Bank's Intranet site. Key information on the whistleblowing system is also published on the Bank's Intranet site in the Compliance Department section, and with regard to the process of accepting reports submitted under the *Whistleblower Protection Act* – on the Bank's website: www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance.

With regard to the whistleblowing process, the Group has implemented separate training for employees, to be refreshed annually. The process governing the submission of whistleblowing reports and the conduct of investigations has also been included in training for members of the Bank's Management Board and Supervisory Board. The area of training for Bank employees is governed by the *Instructions for participation in training programmes at Bank Millennium S.A.*, which is described in more detail in section 17.1.3 *HR policies*.

We ensure the confidentiality of all whistleblowing reports and refrain from taking any action against anyone who, in good faith, reports information regarding potential breaches of the law and/or adopted policies, procedures or the *Code of Ethics*, or who participates in the procedure for reviewing whistleblowing reports, unless a false report or information was provided in bad faith. According to the

Instructions for reporting breaches, the Bank is required to provide the whistleblower with protection against any repression, discrimination or other types of unfair treatment or resulting in the deterioration of their legal or factual situation, or involving threats against them, in particular actions that unfavorably affect their working conditions or terms of employment.

The above *Instructions for reporting breaches* govern the Bank's provision of protection from any retaliation to whistleblowers who report information about a breach of the law or make an external report or a public disclosure.

Reports submitted under the whistleblowing process are summarized annually by the Compliance Department as part of its report duties to the Bank's Management Board, the Supervisory Board Audit Committee and the Supervisory Board. In 2025, there were no reports submitted to the Bank Millennium S.A. Supervisory Board following the procedure set out in the *Rules governing reporting breaches to Supervisory Board in Bank Millennium S.A.* In 2024, there were no reports submitted to the Bank Millennium S.A. Supervisory Board following the procedure set out in the *Rules or Instructions*.

The policies described in chapter 20. *Business conduct* are posted on the Bank's website. In turn, procedures and instructions (including policies) are disseminated among employees via the corporate Intranet. Through various communication channels, including the "help desk" formula, employees may also obtain advice on the pursuit of the company's policies and practices of responsible business conduct (including those related to reporting breaches or counteracting corruption) by referring to the pertinent units, depending on the area in which the advice is sought. For instance, as regards the pursuit of the policy to ensure compliance with supervisory laws and regulations and with internal procedures, the Compliance Department is the competent unit; for the HR policy, the HR Department is the place to go to; for issues related to credit risk, it is the Risk Department. For issues related to responsible business conduct practices, the Compliance Department is the appropriate unit for consultation.

21. EU Taxonomy disclosures (Article 8 of Regulation (EU) 2020/852)

21.1 Legal basis for the Group's reporting obligations under the EU Taxonomy

The Bank Millennium Group is required to publish EU Taxonomy information under Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 ("EU Taxonomy").

The Group prepares EU Taxonomy disclosures following Regulation 2021/2178³⁴ as amended by:

- Regulation 2022/1214³⁵,
- Regulation 2023/2486³⁶, and
- Regulation 2026/73³⁷.

Based on the requirements set out in Annex V of Regulation 2021/2178, Bank Millennium prepares EU Taxonomy disclosures on a consolidated basis according to the scope of prudential consolidation applied by the Bank for capital adequacy purposes.

The Bank's subsidiaries subject to prudential consolidation include:

- Millennium Bank Hipoteczny S.A.
- Millennium Leasing sp. z o.o.
- Millennium Consulting S.A.
- Millennium TFI S.A.
- Millennium Service sp. z o.o.
- Millennium Goodie sp. z o.o.
- Millennium Telecommunication Services sp. z o.o.

Pursuant to Article 10 of Regulation 2021/2178, **the Group discloses Key Performance Indicators (KPI's) for credit institutions (in particular the Green Asset Ratio - GAR)**, including all relevant accompanying information, based on Annexes V, VI and XI of that Regulation. This information relates to the financing of activities specified in Regulations 2021/2139³⁸, 2023/2485³⁹ and 2023/2486⁴⁰ (Regulations setting out EU Taxonomy activities). The Group discloses KPI's of EU Taxonomy eligible,

³⁴ Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation.

³⁵ Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

³⁶ Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

³⁷ Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives.

³⁸ Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.

³⁹ Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives.

⁴⁰ Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

non-eligible, and aligned activities (along with relevant qualitative information) concerning economic activities specified in regulations setting out EU Taxonomy activities.

EU Taxonomy-eligible financing granted by the Group are exposures that finance activities (or objectives/projects related to these activities) listed in regulations setting out EU Taxonomy activities, irrespective of whether these activities meet the Substantial Contribution criteria (SC) and Do No Significant Harm criteria (DNSH) – altogether understood as Technical Screening Criteria (TSC). For the purpose of preparing the table in accordance with template 2 of Annex V, we have assumed that the sectors covered by the Taxonomy are listed in the file available on the EU Taxonomy Navigator website at the date of preparation of this statement.

EU Taxonomy-aligned financing granted by the Group (green/sustainable financing as defined in the EU Taxonomy) are exposures that finance activities (or objectives/projects related to these activities) that meet the TSC set out in the regulations setting out EU Taxonomy activities. In addition, activities aligned with the EU Taxonomy must be conducted in a socially responsible manner, i.e., companies carrying them out must meet the minimum safeguards laid down in Article 18 of Regulation 2020/852. EU Taxonomy-aligned financing is a subset of EU Taxonomy-eligible financing.

21.2 Contextual information on Key Performance Indicators, including the scope of assets and activities covered by KPIs

The Bank prepares and discloses quantitative information in terms of KPIs for activities specified in the regulations setting out EU Taxonomy activities, in accordance with the tabular disclosure templates in Annex VI to Regulation 2021/2178.

In accordance with Annex V to Regulation 2021/2178, the following (partial) KPIs for credit institutions are distinguished, based on the underlying assets:

1. Total Green Asset Ratio (GAR) for financing activities directed at financial undertakings;
2. Total GAR for financing activities directed at non-financial undertakings;
3. GAR for residential real estate exposures, including house renovation loans (for the objective of climate change mitigation);
4. GAR for retail car loans (for the objective of climate change mitigation);
5. GAR for loans to local governments for house financing and other use-of-proceeds lending;
6. GAR for commercial and residential repossessed real estate collateral held for sale (repossessed in the collection process).

Total GAR is an indicator that accumulates all the partial ratios listed in items 1-6 above.

For each of the above indicators of EU Taxonomy-aligned exposures, the disclosure templates set out in Annexes VI and XII of Regulation 2021/2178 also provide for the disclosure of the corresponding percentages of EU Taxonomy-eligible assets.

Additionally, Annex V to Regulation 2021/2178 requires the Group to disclose key EU Taxonomy indicators with respect to off-balance sheet exposures - i.e., for certain financial guarantees issued and for assets managed by the investment fund company (TFI) belonging to the Bank's Group.

The Bank discloses quantitative information on the above indicators using detailed tabular formulas laid down in Annex VI to Regulation 2021/2178.

For exposures to financial and non-financial undertakings included in the partial indicators on assets and off-balance sheet items, the Group has adopted the following methodology to assess EU Taxonomy eligibility and alignment, in accordance with the requirements of Annex V of Regulation 2021/2178:

- **for general purpose financing** - the assessment of eligibility and alignment is based on the EU Taxonomy KPIs, for revenue and capital expenditure (CapEx) published by the Group's customers and by identified subsidiaries of the Group's clients or by parent companies of the Group's clients³⁴ - **therefore, in accordance with the requirements in Regulation 2021/2178, the Group calculates its KPIs twice (first on the basis of its clients' revenue indicators and second on the basis of its clients' CapEx indicators).**
- **for use-of-proceeds financing** - the assessment of eligibility and alignment is based on the Bank's own analysis of the characteristics of the purpose of the financing and the information needed to verify compliance with the technical screening criteria of the EU Taxonomy and minimum safeguards.

Disclosures are presented based on:

- Stock - gross carrying amount of all financial assets as at 31.12.2025.
- Flow - the gross carrying amount of financial assets as at 31.12.2025 that were first recognized in the Group's balance sheet in the reporting period.

Financing of non-financial and financial undertakings

The Bank identifies entities eligible for inclusion in the GAR numerator (i.e. entities required to report under the EU Taxonomy themselves (as well as identified subsidiaries of such entities) or included in such reporting through consolidation by the parent entity) based on the database published by InStrat Foundation and the database maintained on the ESG Platform developed by Biuro Informacji Kredytowej S.A and based on expert portfolio review (for subsidiaries of entities included in InStrat's database and for entities located outside Poland). The same approach was applied to financial undertakings.

Financing of households

To calculate the partial ratio related to the financing of households related to residential properties, the Group has assumed that:

- all mortgage loans granted for the construction/purchase of a house/apartment are EU Taxonomy-eligible under the "climate change mitigation" environmental objective – activity 7.7,
- the Group assesses the EU Taxonomy alignment of mortgage loans based on the technical screening criteria as defined in Regulation 2021/2139 (as amended) based on data from building energy performance certificates and physical risk maps for Poland (Klimada 2.0), making it possible to assess whether the location where the financed property is located is not significantly exposed to flooding or inundations. The Bank has adopted the above risks for assessment, guided by analyses of the Intergovernmental Panel on Climate Change (IPCC), which specify in detail types of physical risk material for Central and Eastern Europe, including Poland. The Bank has found that in the local situation, the key physical risk factors which may adversely affect the value of collateral of mortgage loans are flooding and inundations. Nevertheless, the Bank will monitor whether the assessment of physical risks material to Poland is still valid. In the physical risk assessment, the Bank has followed the *Methodology for identification of increased physical risk in the mortgage portfolio*, adopted by the Bank. The Bank identifies an increased physical risk in the mortgage loan portfolio per exposure, according to the location of the collateral in the form of real property.

If it follows from our analysis that there is a significant risk for the respective location, the Bank excludes the exposure from the portfolio of Taxonomy-aligned loans.

- Compliance with the TSC was assessed depending on the date the financed buildings were built. It has been assessed whether the financed buildings:
 - b. built after 31.12.2020 meet the standards of primary energy need at least 10% lower than the threshold defined for nearly zero-energy buildings under national measures implementing Directive 2010/31/EU of the European Parliament and of the Council,
 - c. built before 31.12.2020 belong to 15% of the most efficient buildings in Poland. For the purpose of defining qualification thresholds for 15% of the most energy-efficient buildings in Poland, the Bank has applied the primary energy demand limits published by the Ministry of Economic Development and Technology (www.gov.pl/web/rozwoj-technologie/Taksonomia-zrownowazonego-finansowania-inwestycji-budynki). For single-family residential buildings, the threshold used is 73.2 kWh/(m²*year), while for multi-family residential buildings, the threshold is 83.18 kWh/(m²*year).
- To assess compliance with the above criteria, the Bank has based its decisions on data acquired from energy performance certificates found in the Central Register of Energy Performance of Buildings maintained by the Minister of Economic Development and Technology.
- In assessing alignment with the EU Taxonomy for retail mortgage loans, the Bank adopted the following approach to the issue of examining minimum social safeguards - in case of financing for households, we assume that the subject of financing is not a producer of goods nor a service provider, as mentioned in the Commission Notice (C/2024/6691) of 8 November 2024.

- Household loan products related to improving the energy efficiency of residential properties are considered EU Taxonomy-eligible under the “climate change mitigation” environmental objective, while in the current reporting cycle the Bank does not have the source data to reliably assess the EU Taxonomy alignment of these credit products.

At year-end 2025, the Bank does not identify any assets in its portfolio that could qualify for partial indices for consumer car financing, for use-of-proceeds financing for local governments, or for real estate taken into the Bank's ownership in the loan loss recovery process.

21.3 Description of alignment with EU Taxonomy in the Group's business strategy, product design processes and engagement with customers and business partners

In 2025, nearly 98% of Taxonomy-aligned exposures were mortgage loans for households (compared to over 95% in 2024). The increase in the green assets ratio compared to the previous year results from the Group's greater activity in financing real estate with low primary energy demand.

With respect to off-balance sheet exposures, the Group has recorded an increase in the green asset ratio for managed assets, especially visible in the key performance indicator for off-balance sheet exposures regarding capital expenditures. This shows increased efforts of entities in the Millennium TFI portfolio to invest in sustainable businesses and the increase in entities reporting sustainability data compared to the previous year.

The Bank Millennium Group takes steps aimed at developing the portfolio of assets financing Taxonomy-aligned activities.

Our *Strategy 2028: Value and Growth* contains objectives of active customer support in their decarbonization efforts, as well as granting PLN 5 billion, over four years, of financing for the customers of the Bank's Group for sustainable projects.

Our goal is to launch an offering of products that would support sustainability in various business segments in the areas of energy efficiency, the use of renewable energy sources and the circular economy, as well as to increase the financing allocated to sustainability projects through active participation in governmental and EU transition programmes to reduce adverse environmental impacts. The Bank is taking proactive measures aiming to build a portfolio of assets that finance environmentally sustainable activities, while adhering to the Environmental Policy and the Responsible Financing Policy. The Bank has implemented a comprehensive green assets classification process - using Bank's internal business criteria based on best market practices and the EU Taxonomy.

More information on the Group's sustainable development strategy can be found in section 15.3. *Sustainability management*.

21.4 Changes compared to the data presented last year

On 4 July 2025, Regulation 2026/73 amending the EU Taxonomy reporting obligations was published. The regulation provides several modifications – simplifications – including, new disclosure templates that the Bank is obliged to publish.

Altogether, the Bank has adapted its disclosures to the implemented changes:

- Annex XII templates are not disclosed anymore (Regulation 2021/2178 – quantitative disclosures for nuclear energy and natural gas activities), as this Annex has been deleted – data on these activities is included in Template 2.
- Reporting templates were updated in accordance with the requirements of Annex VI to Regulation 2026/73.
- Template 1 is duplicated four times: for reporting on stocks and flow, as well as for turnover-based and CapEx-based disclosures. Last year, the Bank reported Template 1 only in relation to stock, as this was clarified through Regulation 2026/73.
- We have updated the methodology for calculating quantitative disclosures, which results from the changes in Regulation 2026/73.

In addition, Article 7(3) implemented in Regulation 2026/73 allows credit institutions to disclose selected exposures to undertakings not subject to CSRD disclosure obligations. This year, we did not include

such voluntary disclosures. In other words, while preparing our disclosures, we relied solely on the list of companies subject to CSRD disclosure obligations.

In our opinion, the modifications in the methodology for calculating KPI's implemented by Regulation 2026/73 are significant enough for KPI's disclosed for 2025 and 2024 to be incomparable. In accordance with the changes introduced in Annex V to Regulation 2021/2178 (point 1.1.2), assets that were previously excluded only from the numerator have been excluded from the denominator of GAR:

- a. Financial assets held for trading,
- b. On demand interbank loans,
- c. Exposures to undertakings not subject to CSRD disclosure obligations,
- d. Derivatives,
- e. Cash and cash-related assets,
- f. Other categories of assets (e.g. Goodwill, commodities etc.).

These changes may increase total GAR compared to last year.

21.5 Quantitative disclosures prepared in accordance with the templates specified in Annex VI to Regulation 2021/2178 (disclosures for 2025)

Table 0.a. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation – for 2025

		Total exposure to Taxonomy-aligned activities (PLN)		KPI (2) (%)	KPI (3) (%)	% coverage (over total assets) (4) (%)	non assessed exposures (% of covered assets) (5)(%)	non assessed exposures (% of covered assets) (5)(%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
Main KPI	Green asset ratio (GAR) stock	1,438,245	1,655,057	2.40%	2.76%	37.90%	0.00%	0.00%
		Total exposure to Taxonomy-aligned activities (PLN)		KPI (2) (%)	KPI (3) (%)	% coverage (over total assets) (4) (%)	non assessed exposures (% of covered assets) (5)(%)	non assessed exposures (% of covered assets) (5)(%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
<i>Additional KPIs</i>	<i>GAR (flow)</i>	252,537	362,362	1.44%	2.07%	27.28%	0.00%	0.00%
	<i>Trading book</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	<i>Financial guarantees</i>	0	0	0.00%	0.00%	N/A	0.00%	0.00%
	<i>Assets under management</i>	143,120	264,432	3.13%	5.78%	N/A	0.00%	0.00%
	<i>Fees and commissions income (1)</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A

(1) fees and commissions income from services other than lending and AuM

(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 banks' total assets

(5) in accordance with Article 7(8) of this Regulation

Table 0.b. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation – for 2024

		Total environmentally sustainable assets (PLN)		Key Performance Indicator (2) (%)	Key Performance Indicator (3) (%)	% coverage (over total assets) (4) (%)	Non-assessed exposures (% of covered assets) (5) (%)	Non-assessed exposures (% of covered assets) (5) (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
Main KPI	Green asset ratio (GAR) stock	1 312 050	1 350 844	1.53%	1.57%	60.66%	0.00%	0.00%
		Total environmentally sustainable activities (PLN)		KPI (2) (%)	KPI (3) (%)	% coverage (over total assets) (4) (%)	Non-assessed exposures (% of covered assets) (5) (%)	Non-assessed exposures (% of covered assets) (5) (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
<i>Additional KPIs</i>	<i>GAR (flow)</i>	232,513	245,289	1.19%	1.26%	48.03%	0.00%	0.00%
	<i>Trading book</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	<i>Financial guarantees</i>	0	0	0.00%	0.00%	N/A	0.00%	0.00%
	<i>Assets under management</i>	69,272	268,156	1.93%	7.46%	N/A	0.00%	0.00%
	<i>Fees and commissions income (1)</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A

(1) Fee and commission income from services other than lending and AuM.

(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 banks' total assets.

(5) In accordance with Article 7(8) of Regulation 2021/2178.

Table 1.1.1 Assets for the calculation of GAR based on stock turnover KPI

Disclosure reference date/period t		2025-12-31																			
PLN '000		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	Of which exposures financing counterparties reporting in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution
					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																				
2	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	59 917 259	29 911 735	1 438 245	1 436 797	1 390	2	22	35	0	1 407 761	180	5 347	0	0	0	0	0			
3	Financia undertakings	124 793	30 290	1 732	1 714	15	2	2	0	0	0	176	214	0	0	0	0	0			
4	Loans and advances	124 793	30 290	1 732	1 714	15	2	2	0	0	0	176	214	0	0	0	0	0			
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
6	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
7	Non-financia undertakings	3 231 040	466 203	29 437	28 006	1 376	0	20	35	0	685	3	5 133	0	0	0	0	0			
8	Loans and advances	3 230 792	466 203	29 437	28 006	1 376	0	20	35	0	685	3	5 133	0	0	0	0	0			
9	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
10	Equity instruments	247	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
11	Households	56 547 649	29 401 465	1 407 077	1 407 077	0	0	0	0	0	1 407 077	0	0	0	0	0	0	0			
12	of which loans collateralised by residential immovable property	35 940 160	28 721 946	1 407 077	1 407 077	0	0	0	0	0	1 407 077	0	0	0	0	0	0	0			
13	of which building renovation loans	679 519	679 519	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
14	of which motor vehicle loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
15	Local governemnts financing	13 777	13 777	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	0	0			
17	Other local government financing	13 777	13 777	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	137	137	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
19	Exposures included on voluntary basis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
20	Total GAR assets	59 917 397	29 911 872	1 438 245	1 436 797	1 390	2	22	35	0	1 407 761	180	5 347	0	0	0	0	0			
21	Assets not covered for GAR calculation	98 174 686																			
22	Central governments and Supranational issuers	56 829 731																			
23	Central banks exposure	13 629 818																			
24	Trading book	1 019 418																			
25	Undertakings and entities not subject to CSRD	18 530 687																			
26	SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations	18 510 032																			
27	Loans and advances	18 484 708																			
28	of which loans collateralised by commercial immovable property	2 106 999																			
29	of which building renovation loans	0																			
30	Debt securities	4 996																			
31	Equity instruments	20 328																			
32	Non-EU country counterparties not subject to NFRD disclosure obligations	20 655																			
33	Loans and advances	1																			
34	Debt securities	20 655																			
35	Equity instruments	0																			
36	Derivatives	0																			
37	On demand interbank loans	215 385																			
38	Cash and cash-related assets	1 046 063																			
39	Other categories of assets (e.g. Goodwill, commodities etc.)	6 903 584																			
40	Total assets	158 092 083																			
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																					
41	Financial guarantees	7 597	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
42	Assets under management	4 586 895	581 463	143 120	142 412	698	0	0	11	0	0	1 995	80 920	0	0	0	0	0			
43	of which debt securities	1 970 890	451 599	88 038	97 560	478	0	0	0	0	0	1 519	52 563	0	0	0	0	0			
44	of which equity instruments	2 565 589	129 904	45 082	44 851	220	0	0	11	0	0	476	28 357	0	0	0	0	0			

Table 1.1.2 Assets for the calculation of GAR based on stock CapEx KPI

Disclosure reference date/period 1		2025-12-31															
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	Of which exposures financing counterparties reporting in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution
					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																
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation																
3	Financia undertakings																
4	Loans and advances																
5	Debt securities, including UoP																
6	Equity instruments																
7	Non-financia undertakings																
8	Loans and advances																
9	Debt securities, including UoP																
10	Equity instruments																
11	Households																
12	of which loans collateralised by residential immovable property																
13	of which building renovation loans																
14	of which motor vehicle loans																
15	Local governments financing																
16	Housing financing																
17	Other local government financing																
18	Collateral obtained by taking possession: residential and commercial immovable properties																
19	Exposures included on voluntary basis																
20	Total GAR assets																
21	Assets not covered for GAR calculation																
22	Central governments and Supranational issuers																
23	Central banks exposure																
24	Trading book																
25	Undertakings and entities not subject to CSRD																
26	SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations																
27	Loans and advances																
28	of which loans collateralised by commercial immovable property																
29	of which building renovation loans																
30	Debt securities																
31	Equity instruments																
32	Non-EU country counterparties not subject to NFRD disclosure obligations																
33	Loans and advances																
34	Debt securities																
35	Equity instruments																
36	Derivatives																
37	On demand interbank loans																
38	Cash and cash-related assets																
39	Other categories of assets (e.g. Goodwill, commodities etc.)																
40	Total assets																
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																	
41	Financial guarantees																
42	Assets under management																
43	of which debt securities																
44	of which equity instruments																

Table 1.2.1 Assets for the calculation of GAR based on flow turnover KPI

Disclosure reference date/period t		2025-12-31	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
PLN '000		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	Of which exposures financing counterparties reporting in accordance with Article 7(9)	Of which not assessed material by the credit institution	
					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																	
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation																	
3	Financia undertakings																	
4	Loans and advances																	
5	Debt securities, including UoP																	
6	Equity instruments																	
7	Non-financia undertakings																	
8	Loans and advances																	
9	Debt securities, including UoP																	
10	Equity instruments																	
11	Households																	
12	of which loans collateralised by residential immovable property																	
13	of which building renovation loans																	
14	of which motor vehicle loans																	
15	Local governments financing																	
16	Housing financing																	
17	Other local government financing																	
18	Collateral obtained by taking possession: residential and commercial immovable properties																	
19	Exposures included on voluntary basis																	
20	Total GAR assets																	
21	Assets not covered for GAR calculation																	
22	Central governments and Supranational issuers																	
23	Central banks exposure																	
24	Trading book																	
25	Undertakings and entities not subject to CSRD																	
26	SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations																	
27	Loans and advances																	
28	of which loans collateralised by commercial immovable property																	
29	of which building renovation loans																	
30	Debt securities																	
31	Equity instruments																	
32	Non-EU country counterparties not subject to NFRD disclosure obligations																	
33	Loans and advances																	
34	Debt securities																	
35	Equity instruments																	
36	Derivatives																	
37	On demand interbank loans																	
38	Cash and cash-related assets																	
39	Other categories of assets (e.g. Goodwill, commodities etc.)																	
40	Non-financial																	
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
41	Financial guarantees																	
42	Assets under management																	
43	of which debt securities																	
44	of which equity instruments																	

Table 1.2.2 Assets for the calculation of GAR based on flow CapEx KPI

Disclosure reference date/period t		2025-12-31	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
PLN '000		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	Of which exposures financing counterparties reporting in accordance with Article 7(9)	Of which not assessed material by the credit institution	
					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																	
2	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	17 534 581	4 167 331	362 362	361 924	411	3	22	0	3	241 553	3 131	57 639	0	0	0	0	0
3	Financia undertakings	124 787	30 842	2 252	2 223	23	3	1	0	3	0	266	413	0	0	0	0	0
4	Loans and advances	124 787	30 842	2 252	2 223	23	3	1	0	3	0	266	413	0	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	Non-financia undertakings	2 573 412	1 200 501	118 557	118 148	388	0	21	0	0	0	2 865	57 226	0	0	0	0	0
8	Loans and advances	2 573 412	1 200 501	118 557	118 148	388	0	21	0	0	0	2 865	57 226	0	0	0	0	0
9	Debt securities, including UoP	0	0	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	0	0	0
11	Households	14 822 604	2 922 211	241 553	241 553	0	-	-	-	-	241 553	0	0	0	0	0	0	0
12	of which loans collateralised by residential immovable property	4 015 274	2 871 536	241 553	241 553	0	-	-	-	-	241 553	0	0	0	0	0	0	0
13	of which building renovation loans	50 676	50 676	0	0	0	-	-	-	-	0	0	0	0	0	0	0	0
14	of which motor vehicle loans	0	0	0	0	0	-	-	-	-	0	0	0	0	0	0	0	0
15	Local governments financing	13 777	13 777	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	0	0
17	Other local government financing	13 777	13 777	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	0	0
19	Exposures included on voluntary basis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Total GAR assets	17 534 581	4 167 331	362 362	361 924	411	3	22	0	3	241 553	3 131	57 639	0	0	0	0	0
21	Assets not covered for GAR calculation	46 731 643																
22	Central governments and Supranational issuers	25 010 019																
23	Central banks exposure	10 315 417																
24	Trading book	381 587																
25	Undertakings and entities not subject to CSRD	8 904 425																
26	SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations	8 904 425																
27	Loans and advances	8 904 425																
28	of which loans collateralised by commercial immovable property	527 321																
29	of which building renovation loans	0																
30	Debt securities	0																
31	Equity instruments	0																
32	Non-EU country counterparties not subject to NFRD disclosure obligations	0																
33	Loans and advances	0																
34	Debt securities	0																
35	Equity instruments	0																
36	Derivatives	0																
37	On demand interbank loans	215 385																
38	Cash and cash-related assets	1 046 063																
39	Other categories of assets (e.g. Goodwill, commodities etc.)	858 737																
40	Total assets	64 266 224																
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
41	Financial guarantees	579	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
42	Assets under management	979 538	482 718	157 675	156 431	1 192	0	52	0	0	0	11 850	92 202	0	0	0	0	0
43	of which debt securities	513 297	251 711	88 150	87 468	683	0	0	0	0	0	6 725	53 005	0	0	0	0	0
44	of which equity instruments	421 236	231 007	69 524	68 964	509	0	52	0	0	0	5 125	39 197	0	0	0	0	0

Table 2.1 GAR sector information based on stock turnover KPI

Disclosure reference date/period t		2025-12-31								
	a	b	c	d	e	f	g	h	i	j
	Breakdown by sector - NACE 4 digits level (code and label) 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	47.29 - Other retail sale of food in specialised stores	650 925	0	0	0	0	0	0	0	0
2	47.19 - Other retail sale in non-specialised stores	462 661	0	0	0	0	0	0	0	0
3	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	357 460	357	0	0	0	0	0	0	0
4	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	312 178	57 066	16 545	15 297	1 249	0	0	0	0
5	46.46 - Wholesale of pharmaceutical goods	278 127	9 843	0	0	0	0	0	0	0
6	46.51 - Wholesale of computers, peripheral equipment and software	185 511	4 500	35	0	0	0	0	35	0
7	63.12 - Web portals	132 757	7 753	0	0	0	0	0	0	0
8	77.11 - Rental and leasing of cars and light motor vehicles	117 082	116 876	0	0	0	0	0	0	0
9	46.35 - Wholesale of tobacco products	114 514	92	0	0	0	0	0	0	0
10	49.20 - Freight rail transport	80 677	80 677	0	0	0	0	0	0	0
11	Nuclear activities (1)	0	0	0						
12	Fossil gas activities (2)	116 228	24 985	0						
13	Of which non-assessed exposures	0								

(1) Referred to in Sections 4.26, 4.27, and 4.28 of Annexes I and II to Delegated Regulation 2021/2139

(2) Referred to in Sections 4.29, 4.30, and 4.31 of Annexes I and II to Delegated Regulation 2021/2139

Table 2.2 GAR sector information based on stock CapEx KPI

Disclosure reference date/period t		2025-12-31								
	a	b	c	d	e	f	g	h	i	j
	Breakdown by sector - NACE 4 digits level (code and label) 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	47.29 - Other retail sale of food in specialised stores	650 925	280 549	7 811	7 811	0	0	0	0	0
2	47.19 - Other retail sale in non-specialised stores	462 661	282 223	23 133	23 133	0	0	0	0	0
3	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	357 460	157 282	0	0	0	0	0	0	0
4	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	312 178	132 310	113 321	113 040	281	0	0	0	0
5	46.46 - Wholesale of pharmaceutical goods	278 127	62 485	8 588	8 588	0	0	0	0	0
6	46.51 - Wholesale of computers, peripheral equipment and software	185 511	150 227	34 031	34 031	0	0	0	0	0
7	63.12 - Web portals	132 757	38 884	28 649	28 649	0	0	0	0	0
8	77.11 - Rental and leasing of cars and light motor vehicles	117 082	116 974	6	6	0	0	0	0	0
9	46.35 - Wholesale of tobacco products	114 514	66 647	0	0	0	0	0	0	0
10	49.20 - Freight rail transport	80 677	80 677	0	0	0	0	0	0	0
11	Nuclear activities (1)	24	0	0						
12	Fossil gas activities (2)	86 805	25 726	0						
13	Of which non-assessed exposures	0								

(1) Referred to in Sections 4.26, 4.27, and 4.28 of Annexes I and II to Delegated Regulation 2021/2139

(2) Referred to in Sections 4.29, 4.30, and 4.31 of Annexes I and II to Delegated Regulation 2021/2139

Table 3.1 Assets for the calculation of GAR based on stock turnover KPI

Disclosure reference date/period t		2025-12-31												
% (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
				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													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	49.92%	2.40%	2.40%	0.00%	0.00%	0.00%	0.00%	0.00%	2.35%	0.00%	0.01%	4.81%	0.00%
3	Financia undertakings	24.27%	1.39%	1.37%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.14%	0.17%	5.72%	0.00%
4	Loans and advances	24.27%	1.39%	1.37%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.14%	0.17%	5.72%	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-financia undertakings	14.43%	0.91%	0.87%	0.04%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.16%	6.31%	0.00%
8	Loans and advances	14.43%	0.91%	0.87%	0.04%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.16%	6.31%	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	51.99%	2.49%	2.49%			0.00%			2.49%	0.00%	0.00%	4.79%	0.00%
12	of which loans collateralised by residential immovable property	79.92%	3.92%	3.92%	0.00%		0.00%			3.92%	0.00%	0.00%	4.90%	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	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%
15	Local governemnts financing	100.00%	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	100.00%	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	100.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
19	Exposures included on voluntary basis (4)	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	
20	Total GAR assets	49.92%	2.40%	2.40%	0.00%	0.00%	0.00%	0.00%	0.00%	2.35%	0.00%	0.01%	4.81%	0.00%

Table 3.2 Assets for the calculation of GAR based on stock CapEx KPI

Disclosure reference date/period t		2025-12-31												
% (compared to corresponding total covered assets in the denominator)		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
				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													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	51.85%	2.76%	2.76%	0.00%	0.00%	0.00%	0.00%	0.00%	2.35%	0.01%	0.11%	5.33%	0.00%
3	Financia undertakings	24.71%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.21%	0.33%	7.30%	0.00%
4	Loans and advances	24.71%	1.80%	1.78%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.21%	0.33%	7.30%	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-financia undertakings	50.10%	7.61%	7.58%	0.02%	0.00%	0.00%	0.00%	0.00%	0.02%	0.09%	2.08%	15.18%	0.00%
8	Loans and advances	50.10%	7.61%	7.58%	0.02%	0.00%	0.00%	0.00%	0.00%	0.02%	0.09%	2.08%	15.18%	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	1.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
11	Households	51.99%	2.49%	2.49%	0.00%		0.00%			2.49%	0.00%	0.00%	4.79%	0.00%
12	of which loans collateralised by residential immovable property	79.92%	3.92%	3.92%	0.00%		0.00%			3.92%	0.00%	0.00%	4.90%	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	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%
15	Local governemnts financing	100.00%	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	100.00%	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	100.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	0.00%
19	Exposures included on voluntary basis (4)	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	
20	Total GAR assets	51.85%	2.76%	2.76%	0.00%	0.00%	0.00%	0.00%	0.00%	2.35%	0.01%	0.11%		

Table 4.1 Assets for the calculation of GAR based on flow turnover KPI

Disclosure reference date/period t		2025-12-31												
% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible	Taxonomy-aligned	c	d	e	f	g	h	i	j	k	l	m
				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
				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													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	17.75%	1.44%	1.44%	0.00%	0.00%	0.00%	0.00%	0.00%	1.38%	0.00%	0.01%	8.11%	0.00%
3	Financia undertakings	24.27%	1.39%	1.37%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.14%	0.17%	5.72%	0.00%
4	Loans and advances	24.27%	1.39%	1.37%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.14%	0.17%	5.72%	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-financia undertakings	5.67%	0.36%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	6.34%	0.00%
8	Loans and advances	5.67%	0.36%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	6.34%	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	19.71%	1.63%	1.63%	0.00%		0.00%			1.63%	0.00%	0.00%	8.27%	0.00%
12	of which loans collateralised by residential immovable property	71.52%	6.02%	6.02%	0.00%		0.00%			6.02%	0.00%	0.00%	8.41%	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	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%
15	Local governemnts financing	100.00%	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	100.00%	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 voluntary basis	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	
20	Total GAR assets	17.75%	1.44%	1.44%	0.00%	0.00%	0.00%	0.00%	0.00%	1.38%	0.00%	0.01%		

Table 4.2 Assets for the calculation of GAR based on flow CapEx KPI

Disclosure reference date/period t		2025-12-31												
% (compared to corresponding total covered assets in the denominator)		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
				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													
2	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	23.77%	2.07%	2.06%	0.00%	0.00%	0.00%	0.00%	0.00%	1.38%	0.02%	0.33%	8.70%	0.00%
3	Financia undertakings	24.72%	1.80%	1.78%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.21%	0.33%	7.30%	0.00%
4	Loans and advances	24.72%	1.80%	1.78%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.21%	0.33%	7.30%	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-financia undertakings	46.65%	4.61%	4.59%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.11%	2.22%	9.88%	0.00%
8	Loans and advances	46.65%	4.61%	4.59%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.11%	2.22%	9.88%	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	19.71%	1.63%	1.63%	0.00%		0.00%			1.63%	0.00%	0.00%	8.27%	0.00%
12	of which loans collateralised by residential immovable property	71.52%	6.02%	6.02%	0.00%		0.00%			6.02%	0.00%	0.00%	8.41%	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	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%
15	Local governemnts financing	100.00%	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	100.00%	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 voluntary basis	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%	
20	Total GAR assets	23.77%	2.07%	2.06%	0.00%	0.00%	0.00%	0.00%	0.00%	1.38%	0.02%	0.33%		

Table 5.1 Off-balance sheet exposures calculation of GAR based on stock turnover KPI

Disclosure reference date/period t		2025-12-31											
		a	b	c	d	e	f	g	h	i	j	k	l
% (compared to corresponding total off-balance sheet assets)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures
				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)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	12.71%	3.13%	3.11%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%	1.77%	0.00%

Table 5.2 Off-balance sheet exposures calculation of GAR based on stock CapEx KPI

Disclosure reference date/period t		2025-12-31											
		a	b	c	d	e	f	g	h	i	j	k	l
% (compared to corresponding total off-balance sheet assets)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures
				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)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	15.68%	5.78%	5.75%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.34%	3.70%	0.00%

Table 5.3 Off balance sheet exposures calculation of GAR based on stock turnover KPI

Disclosure reference date/period t		2025-12-31											
% (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
				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)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	21.79%	5.98%	5.94%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15%	3.03%	0.00%

Table 5.4 Off-balance sheet exposures calculation of GAR based on stock CapEx KPI

Disclosure reference date/period t		2025-12-31											
		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
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)				
% (compared to corresponding total off-balance sheet assets)													
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	49.25%	16.09%	15.96%	0.12%	0.00%	0.01%	0.00%	0.00%	0.00%	1.21%	9.41%	0.00%

22. Appendices

22.1 IRO-2 List of disclosure

IRO-2 List of disclosure requirements fulfilled in the preparation of the sustainability statement following a materiality assessment

ESRS	Disclosure requirement	Chapter in the sustainability statement	
ESRS 2	BP-1	15.1	Basis of preparation
		15.5.1	Description of the double materiality assessment process
	BP-2	15.1	Basis of preparation
	GOV-1	15.4.1	Governance structure
	GOV-2	15.4.1	Governance structure
	GOV-3	15.4.2	Taking sustainability-related performance into account in incentive schemes
	GOV-4	15.4.3	Due diligence
	GOV-5	15.4.4	Sustainability reporting
	SBM-1	15.2.1	Business model
		15.3	Sustainability strategy
	SBM-2	15.2.3	Key stakeholders
	SBM-3	15.5.4	Results of the double materiality assessment update
		15.5.5	Material sustainability-related impacts, risks and opportunities
	IRO-1	15.5.1	Description of the double materiality assessment process
		15.5.2	Double materiality assessment methodology
	IRO-2	15.4.4	Sustainability reporting
		21.1	Legal basis of the Group's reporting obligations under the EU Taxonomy
E1	SBM-3	16.1	Material impacts, risks and opportunities related to climate change
	IRO-1	15.5.3	Identifying and assessing impacts, risks and opportunities
	GOV-3	15.4.2	Taking sustainability-related performance into account in incentive schemes
	E1-1	16.2	Bank Millennium Group's transition plan for climate change mitigation
	E1-2	16.3.1	Policies related to climate change mitigation and adaptation
	E1-3	16.3.2	Actions and resources in relation to the climate policy
	E1-4	16.3.3	Targets related to climate change mitigation and adaptation
	E1-5	16.3.4	Energy consumption and mix
	E1-6	16.3.5	Gross scopes 1, 2, 3 and total GHG emissions
	E1-7	16.3.6	GHG removals and GHG mitigation projects financed with carbon credits
	E1-8	16.3.7	Internal carbon pricing
	E1-9	15.1	Basis of preparation
E2	IRO-1	15.5.3	Identifying and assessing impacts, risks and opportunities
E3	IRO-1	15.5.3	Identifying and assessing impacts, risks and opportunities
E4	IRO-1	15.5.3	Identifying and assessing impacts, risks and opportunities
E5	IRO-1	15.5.3	Identifying and assessing impacts, risks and opportunities
S1	SBM-2	17.1.1	Interests and views of stakeholders
	SBM-3	17.1.2	Material impacts, risks and opportunities and their interaction with strategy and business model
	S1-1	17.1.3	Policies related to own workforce
		17.3.1	Policies related to employment security

ESRS	Disclosure requirement	Chapter in the sustainability statement	
		17.4.1	Policies related to employee compensation
		17.5.1	Policies related to working time
		17.6.1	Policies related to employee health and safety
		17.7.1	Policies related to employee compensation and diversity
		17.8.1	Policies related to training and development
		17.9.1	Policies related to countering violations
		17.10.1	Policies related to privacy
	S1-2	17.1.4	Procedures for cooperation with own workforce and employee representatives regarding impacts
	S1-3	17.9.4	Processes for remediation of negative impacts and channels for reporting violations
	S1-4	17.3.2	Actions taken to implement policy objectives
		17.4.2	Actions taken to implement policy objectives
		17.5.2	Actions taken to implement policy objectives
		17.6.2	Actions taken to implement policy objectives
		17.7.2	Actions taken to implement policy objectives
		17.8.2	Actions taken to implement policy objectives
		17.9.2	Actions taken to implement policy objectives
		17.10.2	Actions taken to implement policy objectives
	S1-5	17.3.3	Objectives related to the pursuit of policies and activities
		17.4.3	Objectives related to the pursuit of policies and activities
		17.5.3	Objectives related to the pursuit of policies and activities
		17.6.3	Objectives related to the pursuit of policies and activities
		17.7.3	Objectives related to the pursuit of policies and activities
		17.8.3	Objectives related to the pursuit of policies and activities
		17.9.3	Objectives related to the pursuit of policies and activities
		17.10.3	Objectives related to the pursuit of policies and activities
	S1-6	17.2.1	Characteristics of the undertaking's employees
	S1-7	17.2.2	Characteristics of non-employees in own workforce
	S1-9	17.7.4	Diversity metrics
	S1-10	17.4.4	Adequate wages
	S1-11	17.3.2	Actions taken to implement policy objectives
	S1-13	17.8.4	Training and skills development metrics
	S1-14	17.6.4	Health and safety metrics
	S1-15	17.3.4	Work-life balance metrics
	S1-16	17.4.5	Compensation metrics
	S1-17	17.9.4	Processes for remediation of negative impacts and channels for reporting violations
S2	SBM-2	15.2.3	Key stakeholders
	SBM-3	18.1	Strategy
	S2-1	18.2	Management of impacts, risks and opportunities
	S2-2	18.2	Management of impacts, risks and opportunities
	S2-3	18.2	Management of impacts, risks and opportunities
	S2-4	18.1	Strategy
		18.2	Management of impacts, risks and opportunities
	S2-5	18.3	Metrics and targets
S4	SBM-2	19.1.1	Interests and views of stakeholders
	SBM-3	19.1.2	Material impacts, risks and opportunities and their interaction with strategy and business model
	S4-1	19.3	Respect for human rights in customer relations

ESRS	Disclosure requirement	Chapter in the sustainability statement	
		19.4.1	Policies related to the safety of deposited funds
		19.5.1	Policies related to privacy
		19.6.1	Policies related to access to (high-quality) information
		19.7.1	Policies related to responsible marketing practices
		19.8.1	Policies related to non-discrimination
	S4-2	19.2	General customer engagement processes
		19.4.2	General customer engagement processes in terms of the safety of deposited funds
		19.5.2	Customer engagement processes in terms of privacy
		19.6.2	Customer engagement processes in terms of access to information
	S4-3	19.9	Remediation of negative impacts
	S4-4	19.4.3	Measures to ensure the safety of deposited funds
		19.5.3	Measures related to privacy
		19.6.3	Measures related to access to information
		19.7.2	Measures related to responsible marketing practices
		19.8.2	Measures related to responsible marketing practices
	S4-5	19.4.4	Objectives related to the pursuit of policies and activities
		19.5.4	Objectives related to the pursuit of policies and activities
		19.6.4	Objectives related to the pursuit of policies and activities
		19.7.3	Objectives related to the pursuit of policies and activities
		19.8.3	Objectives related to the pursuit of policies and activities
G1	IRO-1	20.	Business conduct
		15.5.3	Identifying and assessing impacts, risks and opportunities
	GOV-1	15.4.1	Governance structure
	G1-1	20.1	Corporate culture and business ethics
		20.2	Anti-corruption
		20.3	Whistleblower reporting and protection
	G1-3	20.2	Anti-corruption
	G1-4	20.2	Anti-corruption

22.2 Table consistent with Appendix B

List of data points in cross-cutting and topical standards that derive from other EU legislation

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS 2 GOV-1 Board's gender diversity, sec. 21(d)	Indicator 13 in Table 1 of Annex I		Annex II to Commission Delegated Regulation (EU) 2020/1816		15.4.1. Governance structure
ESRS 2 GOV-1 Percentage of independent board members, sec. 21(e)			Annex II to Delegated Regulation (EU) 2020/1816		15.4.1. Governance structure
ESRS 2 GOV-4 Due diligence statement, sec. 30	Indicator 10 in Table 3 of Annex I				15.4.3. Due diligence
ESRS 2 SBM-1 Participation in activities related to fossil fuel activities, sec. 40(d)(i)	Indicator 4 in Table 1 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on environmental risks and Table 2: Qualitative information on social risks	Annex II to Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS 2 SBM-1 Participation in activities related to the production of chemicals, sec. 40(d)(ii)	Indicator 9 in Table 2 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS 2 SBM-1 Participation in Controversial Weapons Activities, sec. 40(d)(iii)	Indicator 14 in Table 1 of Annex I		Article 12(1) of Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		Irrelevant

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS 2 SBM-1 Participation in activities related to tobacco cultivation and production, sec. 40(d)(iv)			Article 12(1) of Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS E1-1 Transition plan to achieve climate neutrality by 2050, sec. 14				Article 2(1) of Regulation (EU) 2021/1119	16.2 Bank Millennium Group's transition plan for climate change mitigation
ESRS E1-1 Entities excluded from the scope of Paris-aligned benchmarks, sec 16(g)		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 1: Banking portfolio – Climate change transition risk: credit quality of exposures by sector, issue and residual maturity	Article 12(1), points (d) to (g), and Article 12(2) of Delegated Regulation (EU) 2020/1818		16.2 Bank Millennium Group's transition plan for climate change mitigation
ESRS E1-4 Greenhouse gas emission reduction targets, sec. 34	Indicator 4 in Table 2 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 3: Banking portfolio – Climate change transition risks: adjustment indicators	Article 6 of Delegated Regulation (EU) 2020/1818		16.3.3. Targets related to climate change mitigation and adaptation
ESRS E1-5 Consumption of energy from fossil sources disaggregated by source (only applicable to sectors with a significant climate impact), sec. 38	Indicator 5 in Table 1 and indicator 5 in Table 2 in Annex I				16.3.4. Energy consumption and mix
ESRS E1-5 Energy consumption and energy mix, sec. 37	Indicator 5 in Table 1 of Annex I				16.3.4. Energy consumption and mix

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS E1-5 Energy intensity linked to activities in sectors with a significant climate impact, sec. 40 to 43	Indicator 6 in Table 1 of Annex I				16.3.4. Energy consumption and mix
ESRS E1-6 Gross Scope 1, 2, 3 Greenhouse Gas Emissions and Total Greenhouse Gas Emissions, sec. 44	Indicators 1 and 2 in Table 1 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 1: Banking portfolio – Climate change transition risks: credit quality of exposures by sector, issuance and residual maturity	Articles 5(1), 6 and 8(1) of Delegated Regulation (EU) 2020/1818		16.3.5. Gross Scope 1, 2 and 3 Greenhouse Gas Emissions and Total Greenhouse Gas Emissions
ESRS E1-6 Gross greenhouse gas intensity, sec. 53-55	Indicator 3 in Table 1 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 3: Banking portfolio – Climate change transition risks: adjustment indicators	Article 8(1) of Delegated Regulation (EU) 2020/1818		16.3.5. Gross Scopes 1, 2, 3 and Total GHG emissions
ESRS E1-7 Greenhouse gas removals and carbon credits, sec. 56				Article 2(1) of Regulation (EU) 2021/1119	16.3.6. GHG removals and GHG mitigation projects financed with carbon credits
ESRS E1-9 Exposure of the reference portfolio to climate-related physical risks, sec. 66			Annex II to Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		Important, however, the information is not disclosed due to a transitional provision, "Quick fix"

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS E1-9 Disaggregation of cash amounts by acute and ongoing physical risk, point 66(a)ESRS E1-9 Location of significant assets with material physical risk, sec. 66(c)		Article 449a of Regulation (EU) No 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5: Banking portfolio – Physical risks related to climate change: exposures subject to physical risk.			Important, however, the information is not disclosed due to a transitional provision
ESRS E1-9 Breakdown of the book value of immovable property by energy efficiency class, sec. 67(c)		Article 449a of Regulation (EU) No 575/2013; point (34) of Commission Implementing Regulation (EU) 2022/2453; Template 2: Banking portfolio – Transition risk related to climate change: loans secured by real estate – energy efficiency of collateral			Important, however, the information is not disclosed due to a transitional provision
ESRS E1-9 Degree of portfolio exposure to climate-related opportunities, sec. 69			Annex II to Delegated Regulation (EU) 2020/1818		Important, however, the information is not disclosed due to a transitional provision
ESRS E2-4 Amount of each pollutant listed in Annex II to the Regulation on E-PRTR (European Pollutant Release and Transfer Register) emitted into air, water and soil, sec. 28	Indicator 8 in Table 1 of Annex I, indicator 2 in Table 2 of Annex I, indicator 1 in Table 2 of Annex I and indicator 3 in Table 2 of Annex I				Not important
ESRS E3-1 Water and marine resources, sec. 9	Indicator 7 in Table 2 of Annex I				Not important
ESRS E3-1 Special policy, sec. 13	Indicator 8 in Table 2 of Annex I				Not important

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS E3-1 Sustainable practices in the field of seas and oceans, sec. 14	Indicator 12 in Table 2 of Annex I				Not important
ESRS E3-4 Total amount of water recycled and reused, sec. 28(c)	Indicator 6.2 in Table 2 of Annex I				Not important
ESRS E3-4 Total water consumption in m3 per net revenue from own operations item, sec. 29	Indicator 6.1 in Table 2 of Annex I				Not important
ESRS 2 SBM 3-E4 sec. 16(a) PPKT (i)	Indicator 7 in Table 1 of Annex I				Not important
ESRS 2 SBM 3-E4 sec. 16(b)	Indicator 10 in Table 2 of Annex I				Not important
ESRS 2 SBM 3-E4 sec. 16(c)	Indicator 14 in Table 2 of Annex I				Not important
ESRS E4-2 Sustainable land/agriculture practices or policies, sec. 24(b)	Indicator 11 in Table 2 of Annex I				Not important
ESRS E4-2 Sustainable ocean/sea practices or policies, sec. 24(c)	Indicator 12 in Table 2 of Annex I				Not important
ESRS E4-2 Policies to combat deforestation, sec. 24(d)	Indicator 15 in Table 2 of Annex I				Not important
ESRS E5-5 Non-recycled waste, sec. 37(d)	Indicator 13 in Table 2 of Annex I				Not important
ESRS E5-5 Hazardous and radioactive wastes, sec. 39	Indicator 9 in Table 1 of Annex I				Not important
ESRS 2 SBM-3-S1 Risk of forced labour, sec. 14(f)	Indicator 13 in Table 3 of Annex I				Not important

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS 2 SBM-3-S1 Risk of child labour , sec. 14(g)	Indicator 12 in Table 3 of Annex I				Not important
ESRS S1-1 Human rights policy commitments, sec. 20	Indicator 9 in Table 3 and indicator 11 in Table 1 in Annex I				17.1.3. Policies related to own workforce
ESRS S1-1 Due diligence policies on issues covered by the ILO Conventions 1 to 8, sec. 21			Annex II to Delegated Regulation (EU) 2020/1816		17.1.3. Policies related to own workforce
ESRS S1-1 Procedures and measures to prevent trafficking in human beings, sec. 22	Indicator 11 in Table 3 of Annex I				17.1.3. Policies related to own workforce
ESRS S1-1 Policy or management system for the prevention of accidents at work, sec. 23	Indicator 1 in Table 3 of Annex I				17.6.1. Policies related to employee health and safety
ESRS S1-3 Complaint-handling mechanisms, sec. 32(c)	Indicator 5 in Table 3 of Annex I				17.9.4. Processes for remediation of negative impacts and channels for reporting violations
ESRS S1-14 Number of work-related deaths and number and rate of work-related accidents, sec. 88(b) and (c)	Indicator 2 in Table 3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		17.6.4. Health and safety metrics
ESRS S1-14 Number of days lost due to injuries, accidents, fatalities or illnesses, sec. 88(e)	Indicator 3 in Table 3 of Annex I				17.6.4. Health and safety metrics
ESRS S1-16 Unadjusted gender pay gap, sec. 97(a)	Indicator 12 in Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		17.4.5. Compensation metrics
ESRS S1-16 Excessive remuneration of the Director-General, sec. 97(b)	Indicator 8 in Table 3 of Annex I				17.4.5. Compensation metrics

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS S1-17 Cases of discrimination, sec. 103(a)	Indicator 7 in Table 3 of Annex I				17.9.4. Processes for remediation of negative impacts and channels for reporting violations
ESRS S1-17 Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines, sec. 104(a)	Indicator 10 in Table 1 and indicator 14 in Table 3 in Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		17.9.4. Processes for remediation of negative impacts and channels for reporting violations
ESRS 2 SBM-3-S2 Significant risk of child labour or forced labour in the value chain, sec. 11(b)	Indicators 12 and 13 in Table 3 of Annex I				Not important
ESRS S2-1 Human rights policy commitments, sec. 17	Indicator 9 in Table 3 and indicator 11 in Table 1 in Annex I				18.2. Managing impacts, risks and opportunities
ESRS S2-1 Policies related to workers in the value chain, sec. 18	Indicators 11 and 4 in Table 3 of Annex I				18.2. Managing impacts, risks and opportunities
ESRS S2-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines, sec. 19	Indicator 10 in Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		18.2. Managing impacts, risks and opportunities
ESRS S2-1 Due diligence policies for issues covered by the International Labour Organisation Conventions 1-8, sec. 19			Annex II to Delegated Regulation (EU) 2020/1816		18.2. Managing impacts, risks and opportunities

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS S2-4 Human rights issues and incidents related to the upstream and downstream value chain, sec. 36	Indicator 14 in Table 3 of Annex I				18.2. Managing impacts, risks and opportunities
ESRS S3-1 Policy commitments on respect for human rights, sec. 16	Indicator 9 in Table 3 of Annex I and Indicator 11 in Table 1 of Annex I				Not important
ESRS S3-1 Non-compliance with the UN Guiding Principles on Business and Human Rights, ILO Rules or OECD Guidelines, sec. 17	Indicator 10 in Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Not important
ESR, S3-4, Human rights issues and incidents, sec. 36	Indicator 14 in Table 3 of Annex I				Not important
ESRS S4-1 Policy relating to consumers and end-users, sec. 16	Indicator 9 in Table 3 and indicator 11 in Table 1 in Annex I				19.3. Respect for human rights in customer relations
ESRS S4-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines, sec. 17	Indicator 10 in Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		19.3. Respect for human rights in customer relations
ESRS S4-4 Human rights issues and incidents, sec. 35	Indicator 14 in Table 3 of Annex I				19.3. Respect for human rights in customer relations
ESRS G1-1 United Nations Convention against Corruption, sec. 10(b)	Indicator 15 in Table 3 of Annex I				20.2. Anti-corruption
ESRS G1-1 Whistleblower protection, sec. 10(d)	Indicator 6 in Table 3 of Annex I				20.3. Whistleblower reporting and protection

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability statement - section
ESRS G1-4 Fines for breaches of anti-corruption and anti-bribery laws, sec. 24(a)	Indicator 17 in Table 3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		20.2. Anti-corruption
ESRS G1-4 Anti-corruption and anti-bribery standards, sec. 24(b)	Indicator 16 in Table 3 of Annex I				20.2. Anti-corruption

A person wearing a white long-sleeved shirt is seated at a wooden desk. Their hands are clasped together in front of them. On the desk, there is a laptop on the left and several documents or books. In the foreground, another person's hand is visible, holding a pen and writing on a document. The background is slightly blurred, showing some indoor plants and a warm light source.

Part III

Statement of the

Management Board

Statement of the Management Board

According to the best knowledge of the Management Board, the annual financial statements of Bank Millennium S.A. and Capital Group of Bank Millennium S.A. as at 31 December 2025 and the comparable data, were prepared in line with the accounting principles, and reflect, truly, reliably, and clearly, the asset and financial position of the Bank and Capital Group of Bank Millennium and their financial results. This Management Board Report on activity of Bank Millennium S.A. and Capital Group of Bank Millennium S.A. has been prepared in accordance with the applicable legal regulations and contains a true picture of development, profitability and condition of Bank Millennium S.A. and the Capital Group of Bank Millennium S.A.

Furthermore, the Management Board declares that the Sustainability Reporting of Bank Millennium S.A. and the Capital Group of Bank Millennium S.A. for the year 2025 has been prepared in accordance with: the Accounting Act, the European Sustainability Reporting Standards (ESRS), and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, together with the delegated acts issued thereunder.

Selection of an entity authorized to audit financial reports and to provide assurance of sustainability reporting

The entity authorized to review the financial reports and to provide assurance on sustainability reporting, responsible for auditing the annual financial statements of Bank Millennium S.A. and the Capital Group of Bank Millennium S.A. prepared as at the balance-sheet date of 31 December 2025 as well as providing assurance on the Sustainability reporting of Bank Millennium S.A. and the Capital Group of Bank Millennium S.A. for the year 2025, was selected in accordance with the applicable legal provisions. This entity, together with the statutory auditors conducting the audit of the financial statements and the assurance engagement on the sustainability reporting, met all conditions necessary to issue an impartial and independent opinion on the audit, in compliance with the relevant national legal requirements.

Signatures:

Date	Name and surname	Position/ Function	Signature
27.02.2026	Joao Bras Jorge	Chairman of the Management Board	signed with a qualified electronic signature
27.02.2026	Fernando Bicho	Deputy Chairman of the Management Board	signed with a qualified electronic signature
27.02.2026	Wojciech Haase	Member of the Management Board	signed with a qualified electronic signature
27.02.2026	Jarosław Hermann	Member of the Management Board	signed with a qualified electronic signature
27.02.2026	Halina Karpińska	Member of the Management Board	signed with a qualified electronic signature
27.02.2026	António Pinto Júnior	Member of the Management Board	signed with a qualified electronic signature
27.02.2026	Magdalena Zmitrowicz	Member of the Management Board	signed with a qualified electronic signature

Glossary

Adjusted BCA - Adjusted Baseline Credit Assessment

AML - Anti-Money Laundering

AuM - Assets under Management

BCA - Baseline Credit Assessment

BFG (Bankowy Fundusz Gwarancyjny) – The Polish Bank Guarantee Fund that secures bank deposits and finances financial institution restructuring.

BLIK (BLIK mobile payment system) – A Polish mobile payment system based on one-time codes generated in a banking app.

BPV - Basis Point Value

CRR / CR Assessment - Counterparty Risk Rating / Assessment

CRR3 - Capital Requirements Regulation III

CTF - Counter-Terrorism Financing

DTA - Deferred Tax Asset

eBOK (Elektroniczna Baza Obsługi Klienta) – An electronic system allowing leasing clients to access contract and payment information online.

EMTN - Euro Medium Term Note Programme

ESG - Environmental, Social, Governance

ETR - Effective Tax Rate

EVE - Economic Value of Equity

FOMC - Federal Open Market Committee

FTE - Full-Time Equivalent

IEA - Interest-Earning Assets

IKE (Indywidualne Konto Emerytalne) – A tax-advantaged retirement savings account in Poland.

IRB Method (Internal Ratings-Based) – A method allowing the Bank to calculate capital requirements using internal credit risk models.

IRRBB - Interest Rate Risk in the Banking Book

ISIN - International Securities Identification Number

KNF (Komisja Nadzoru Finansowego) – The Polish Financial Supervision Authority overseeing the financial market.

KYC - Know Your Customer

KUKE (Korporacja Ubezpieczeń Kredytów Eksportowych) – An institution supporting Polish exports through guarantees and insurance.

L/D - Loans-to-Deposits ratio

LCR - Liquidity Coverage Ratio

LGD - Loss Given Default

LT IDR / LC LT IDR - Long-Term Issuer Default Rating / Long-Term Local Currency Issuer Default Rating

LTFR (*pol. WFD*) - Long-term Funding Ratio - a measure of stable sources funding mortgage portfolio

SICR Methodology (Significant Increase in Credit Risk) – A process for identifying significant credit risk increases in line with IFRS 9.

MiFID II - Markets in Financial Instruments Directive II

MREL - Minimum Requirement for Own Funds and Eligible Liabilities

MRELtem / MRELtrea - MREL temporary / MREL transitional

NFOŚiGW (Narodowy Fundusz Ochrony Środowiska i Gospodarki Wodnej) – Polish institution financing environmental protection projects.

NII - Net Interest Income

NIM - Net Interest Margin

NPL - Non-Performing Loans

NSFR - Net Stable Funding Ratio

OCR - Overall Capital Requirement

OSII Buffer - Other Systemically Important Institution Buffer

P2G (Pillar 2 Guidance) – A supervisory capital add-on to enhance Bank's resilience to risk.

PPK (Pracownicze Plany Kapitałowe) – A voluntary retirement savings system co-financed by employees and employers.

Retail credit exposures (RRE, QRRE) – RRE secured by residential property, QRRE are revolving exposures like credit lines.

SICR - Significant Increase in Credit Risk

SOT - Supervisory Outlier Test

T1 - Tier 1 Capital Ratio

TCR - Total Capital Ratio

VaR - Value at Risk

VAS - Value-Added Services

VR - Viability Rating

WSE - Warsaw Stock Exchange

2nd Fillar Buffer (P2R) – An additional capital buffer set by the Polish Financial Supervision Authority to strengthen credit loss resilience.