



**Consolidated report of  
the Bank Millennium S.A.  
Capital Group for  
3<sup>rd</sup> quarter of 2025**

**Consolidated Financial Highlights**

	Amount '000 PLN		Amount '000 EUR	
	1.01.2025 – 30.09.2025	1.01.2024 – 30.09.2024	1.01.2025 – 30.09.2025	1.01.2024 – 30.09.2024
Interest income and other of similar nature	6 847 929	6 487 795	1 616 412	1 508 018
Fee and commission income	795 160	799 242	187 693	185 775
Profit (loss) before income tax	1 204 345	563 748	284 278	131 037
Profit (loss) after taxes	855 252	546 696	201 877	127 074
Total comprehensive income of the period	1 036 299	750 243	244 612	174 386
Net cash flows from operating activities	12 852 872	6 786 542	3 033 842	1 577 459
Net cash flows from investing activities	(11 615 299)	(12 664 481)	(2 741 721)	(2 943 722)
Net cash flows from financing activities	76 879	1 824 174	18 147	424 010
Net cash flows, total	1 314 452	(4 053 765)	310 268	(942 254)
Earnings (losses) per ordinary share (in PLN/EUR)	0.71	0.45	0.17	0.10
Diluted earnings (losses) per ordinary share	0.71	0.45	0.17	0.10
	<b>30.09.2025</b>	<b>31.12.2024</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
Total Assets	152 686 156	138 953 860	35 764 583	32 519 040
Liabilities to banks and other monetary institutions	193 004	204 459	45 208	47 849
Liabilities to customers	128 185 546	117 257 213	30 025 660	27 441 426
Equity	8 807 933	7 771 634	2 063 134	1 818 777
Share capital	1 213 117	1 213 117	284 156	283 903
Number of shares (pcs.)	1 213 116 777	1 213 116 777	1 213 116 777	1 213 116 777
Book value per share (in PLN/EUR)	7.26	6.41	1.70	1.50
Diluted book value per share (in PLN/EUR)	7.26	6.41	1.70	1.50
Total Capital Ratio (TCR)	15.97%	17.24%	15.97%	17.24%
Pledged or paid dividend per share (in PLN/EUR)	-	-	-	-

**Exchange rates accepted to convert selected financial data into EUR**

for items as at the balance sheet date	-	-	4.2692	4.2730
for items for the period covered by the report (exchange rate calculated as the average of exchange rates at the end of individual months of the period)	-	-	4.2365	4.3022

## BANK MILLENNIUM GROUP IN 9M25

### Key financial indicators



#### NET PROFIT / ROE

**PLN855mn**  
**ROE 14.2%**



#### COST-TO-INCOME

**36.7%** (reported)  
**35.1%** (adjusted)



#### TOTAL ASSETS

**PLN153bn**



#### CAPITAL RATIOS

**T1 14.4%**  
**TCR 16.0%**

### Key operating statistics



#### OUR CLIENTS

**3.2mn active retail**  
**clients**  
**39k active corpo/SME**  
**clients**



#### OUR EMPLOYEES

**6,824 FTEs**



#### ONLINE USERS

**>3.0mn active**  
**digital users**



#### TRANSACTIONS

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

### Basic facts for investors



#### MARKET CAP.\*

**PLN17.5bn**  
**(EUR4.1bn)**



#### SHARE PRICE\*

**PLN14.4**  
**+62% ytd**  
**+70% y/y**



#### INDICES

**WIG**  
**WIG30**  
**mWIG40**  
**WIG Banks**  
**MSCI Poland**



#### RATINGS

**Moody's: Baa2**  
(adjusted BCA: ba1)  
Positive outlook  
**Fitch: BBB-** (VR:  
bbb-) Stable outlook

(\*) on 30.09.2025

# INFORMATION ABOUT ACTIVITY OF BANK MILLENNIUM AND CAPITAL GROUP OF BANK MILLENNIUM S.A. IN 3Q25/9M25

## FINANCIAL RESULTS – KEY POINTS

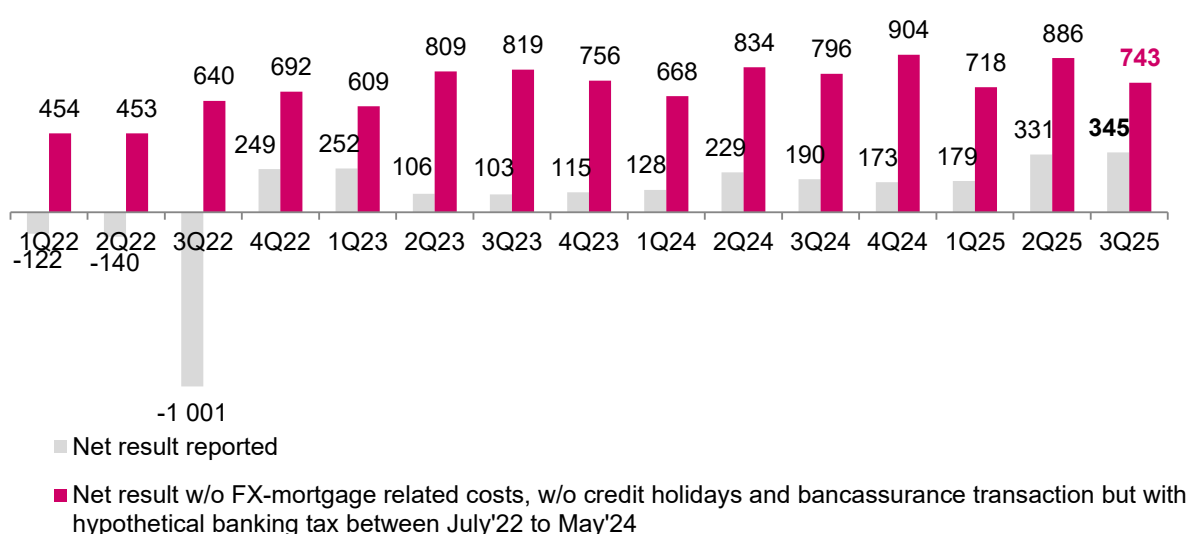
Bank Millennium S.A. Capital Group's ('BM Group', 'Group') reported net profit of PLN345 million in 3Q25 (up 4% q/q) and PLN855 million in 9M25 (up 56% y/y) translating into annualised quarterly ROE of 15.0% and 14.2% ROE in 9M25. 3Q25 was characterised by a relatively small number of extraordinary items and the still relatively elevated, although dropping, costs related to FX-mortgage portfolio. In 3Q25 the latter totalled PLN399 million after tax while in 9M25 they amounted to PLN1,492 million, dropping 17% y/y.

Core operating performance remained solid, generating the lion's share of this strong quarterly and year-to-date result. Total loans were marginally up in 3Q25 but growth in the corporate book accelerated further (+6% q/q) with y/y growth rate at 12%. Investment loans accounted for 42% of newly originated loans in 3Q25. In contrast, retail book showed negative q/q and y/y dynamics due to a combination of fast contracting FX-mortgage portfolio and low, although accelerating, origination of PLN mortgages. These more than offset the continuing solid origination of consumer loans. Liquidity surplus increased further with deposits up 5% q/q and up 12% y/y while L/D ratio reached a new low of 58%. Number of active retail clients remained in a steady uptrend (3.234 million, up 4% y/y), number of active digital clients crossed the 3 million threshold while volume of investment products grew 9% q/q to over PLN14.2 billion. Within these, funds managed by Millennium TFI, a mutual fund company, exceeded PLN10 billion.

Steady reduction of risk related to legacy FX-mortgage book continued. Inflow of new court cases against the Bank continued to slow (>900 cases in 3Q25 vs. 2024 quarterly average of 1.5 thousand), while the number of amicable settlements increased to over 1.2 thousand in 3Q25. To date, over 29 thousand such settlements took place, representing nearly half the number of active FX-mortgage loans at the end of 2019, when 'saga' started. The number of active claims against the Bank continued to decline while the ratio of legal risk provisions to gross active book crossed the level of 150%. 3Q25 net profit without FX-mortgage related costs would amount to PLN743 million, down 7% y/y, while 9M25 adjusted net profit would stand at PLN2,347 million, up 2% y/y.

Capital ratios improved in the period (group TCR at 16.0%, T1 at 14.4%) as the Bank / Group recognised in regulatory capital 1H25 net profit. This largely offset the increase of risk weighted assets. Capital buffers and MREL surpluses remained solid.

Quarterly net results: reported and adjusted (PLNmn)



Key Profit & Loss indicators (PLN million)	9M25	9M24	y/y	3Q25	2Q25	q/q
Net interest income	4,318	4,025	7%	1,446	1,448	0%
Net commission income	575	589	-2%	204	188	9%
<b>Core income</b>	<b>4,892</b>	<b>4,614</b>	<b>6%</b>	<b>1,650</b>	<b>1,636</b>	<b>1%</b>
Other non-interest income	273	177	54%	99	112	-12%
<b>Total operating income</b>	<b>5,165</b>	<b>4,791</b>	<b>8%</b>	<b>1,749</b>	<b>1,749</b>	<b>0%</b>
Personnel costs	(1,008)	(887)	14%	(339)	(347)	-2%
Other administrative costs	(889)	(769)	16%	(288)	(255)	13%
<b>Total operating costs</b>	<b>(1,897)</b>	<b>(1,656)</b>	<b>15%</b>	<b>(627)</b>	<b>(602)</b>	<b>4%</b>
Impairment provisions and other cost of risk *	(194)	(307)	-37%	(113)	6	-1950%
FX legal risk related cost	(1,570)	(2,131)	-26%	(485)	(589)	-18%
Banking tax	(301)	(134)	125%	(101)	(101)	0%
Pre-income tax profit	1,204	564	114%	424	463	-9%
Income tax	(349)	(17)	1947%	(79)	(132)	-40%
<b>Net profit – reported</b>	<b>855</b>	<b>547</b>	<b>56%</b>	<b>345</b>	<b>331</b>	<b>4%</b>
<b>Net profit – adjusted **</b>	<b>2,347</b>	<b>2,297</b>	<b>2%</b>	<b>743</b>	<b>886</b>	<b>-16%</b>
NIM	4.1%	4.4%	-0.3%	3.9%	4.1%	-0.2%
Cost/income reported	36.7%	34.6%	2.2%	35.8%	34.4%	1.4%
Cost/income <i>adjusted</i> ***	35.1%	30.5%	4.6%	37.2%	33.9%	3.3%
Cost of risk (bp)	32	53	-21	54	(3)	57
ROE	14.2%	10.4%	3.8%	15.0%	15.2%	-0.3%

(\*) Include depreciation and amortisation, (\*\*) Impairment provisions for financial and non-financial assets including also fair value adjustment (PLN0.4mn in 9M25 and PLN3.2mn in 9M24) 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 9M24); (\*\*\*\*) Without extraordinary income or cost and with linear distribution of BFG resolution fund fee throughout the year' (\*\*\*\*\*) Reported net profits adjusted for proportional allocation of annual BFG resolution fund fee / average equity in the period.

Key Balance Sheet indicators (PLN million)	30.09.2025	31.12.2024	ytd	30.09.2024	y/y
Loans to households	54,604	56,935	-4%	57,594	-5%
Loans to companies and public sector	20,125	18,040	12%	17,948	12%
<b>Total net loans to clients</b>	<b>74,729</b>	<b>74,975</b>	<b>0%</b>	<b>75,542</b>	<b>-1%</b>
<b>Total assets</b>	<b>152,686</b>	<b>138,954</b>	<b>10%</b>	<b>135,379</b>	<b>13%</b>
Deposits of individuals	94,178	87,567	8%	84,530	11%
Deposits of companies and public sector	34,008	29,690	15%	29,451	15%
<b>Total deposits</b>	<b>128,186</b>	<b>117,257</b>	<b>9%</b>	<b>113,981</b>	<b>12%</b>
Impaired loan ratio*	4.2%	4.5%	-0.3%	4.6%	-0.5%
CET1 = T1	14.4%	15.2%	-0.8%	15.3%	-0.9%
TCR	16.0%	17.2%	-1.3%	17.9%	-2.0%

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

## Key developments in the period

The key developments in 3Q25 were as follows:

- **Number of active digital users exceeded the 3 million threshold** in September 2025. This represents a growth of 188 thousand users or 4% year to date and compares with 2.86 million users in the same period last year. Bank Millennium's mobile app is the main access channel to our offer for most of customers. Over 70% of digital customers are using only the mobile app for their banking activity.
- **Assets managed by Millennium TFI, a mutual fund company, exceeded PLN10 billion** level in September after a 31% growth year to date. Number of customers increased to over 200k. Customers' assets totalled over PLN14 billion and grew 29% year to date.
- **NII remained resilient to interest rate changes** with no change in the quarter and with 9M25 NII up 7% y/y on a reported basis (up 3% y/y without credit holiday impact) despite four cuts of NBP's reference rate (combined effect of 100bps).
- **Growth in the corporate book including leasing and factoring accelerated to 12% y/y** with companies loan growth at 17% y/y. Origination totalled PLN3.4bn (up 22% q/q) with loans up 15% q/q and share of investment loans at 42%.
- **Origination of PLN mortgages in 3Q25 nearly doubled q/q to PLN1.1 billion (disbursement) with market share in sales increasing to 4.4%.** Though still below levels in the respective period last year, the growth marks a return of the trend that should over time contribute to a stabilisation of portfolio of PLN mortgages (down 2% q/q in 3Q25). Origination of cash loans remained very strong with PLN1.9bn originated in 3Q25 and market share of 10.0%.
- **Capital ratios improved** in 3Q25 following the inclusion of 1H25 net profit into regulatory capital. This largely offset the increase of risk weighted assets (i.a. amortising securitisation and increasing share of corporate lending) and as a result Group TCR increased to 16.0% while T1 to 14.4% with surpluses over the required regulatory levels solid at 4.2p.p. and 4.6p.p. respectively

## Substantial and extraordinary P&L items

3Q25 saw a very small number of substantial and extraordinary items affecting the results. As in previous quarters, FX-mortgage related costs had a material negative impact on the results (for a comment on change of presentation and detailed breakdown refer to a separate section in this report). PLN45 million provision for consumer protection related costs burdened other operating costs line (OOC). Nearly a half of the PLN14 million provision for unused holidays created in 2Q25 was reversed.

Last, but not least, the tax line saw a recalculation of effective annual tax rate (ETR). Dropping from 34.58% used in 1H25 to 28.99% in 9M25, the change largely reflected a higher proportion of tax deductible items in FX-mortgage related costs. More details are available further in the report (note 11).

## FX-mortgage portfolio and related costs

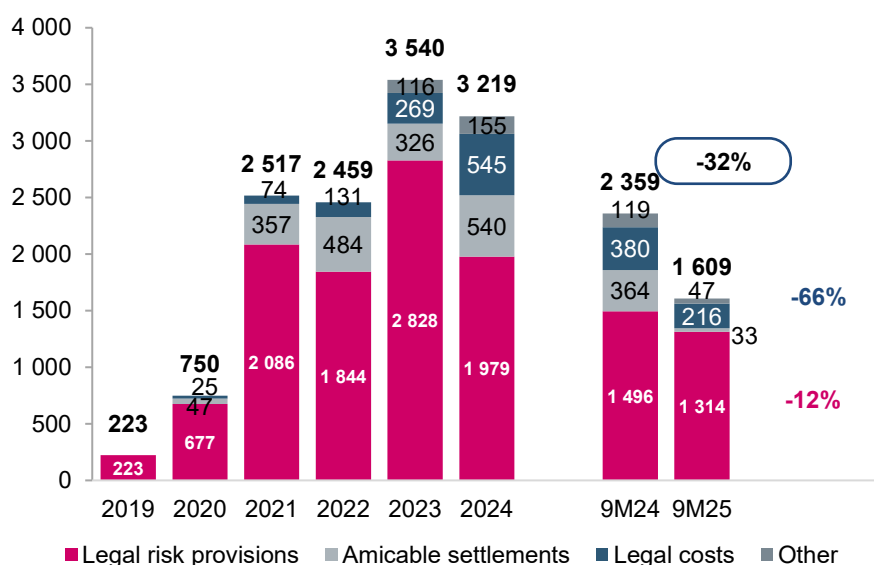
### *Total costs related to FX-mortgage portfolio*

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).

All-in quarterly 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), dropped 19% q/q to PLN442 million pre-tax (PLN399 million after tax) and continued to be a material drag on the core business of the Group. In 9M25 these costs totalled PLN1,609 million pre-tax (PLN1,492 million after tax) and were down 32% y/y. All items were visibly lower than in the same period last year.



### FX-mortgage related costs (PLNmN pre-tax)



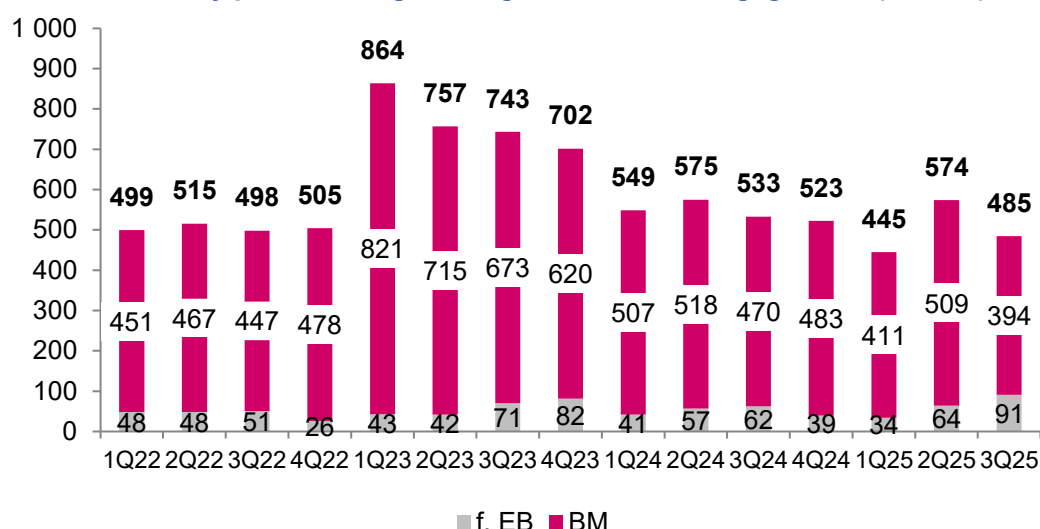
(\*) without legal risk costs related to FX-mortgages originated by former Euro Bank

### Legal risk provisions

Total cost of provisions against legal risk related to FX-mortgage portfolio ('FX-mortgage provisions') amounted to PLN485 million pre-tax in 3Q25 with PLN394 million (down 16% y/y) attributable to FX-mortgages originated by Bank Millennium. Post-tax cost of FX-mortgage related provisions attributable to portfolio originated by Bank Millennium totalled PLN359 million in 3Q25 vs. PLN425 million in 3Q24. In 9M25, pre-tax cost of FX-mortgage related provisions attributable to portfolio originated by Bank Millennium totalled PLN1,314 million (PLN1,252 million after tax) compared to PLN1,496 million (PLN1,091 million) in the comparable period last year.

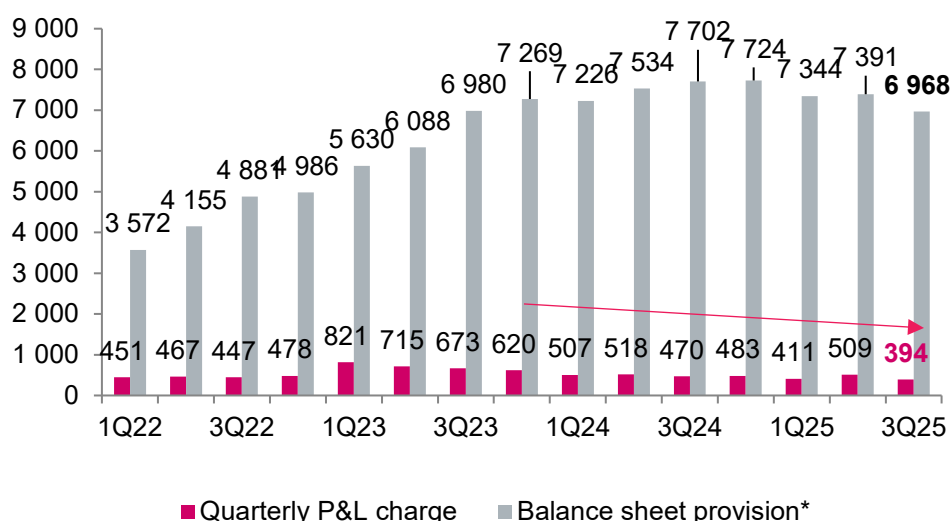
In 9M25, further provisioning was driven by updated inputs into the Bank's provisioning methodology, reflecting factors not related to the inflow of court claims, such as additional costs incurred upon invalidation verdicts of the loan agreements and present value of future losses.

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



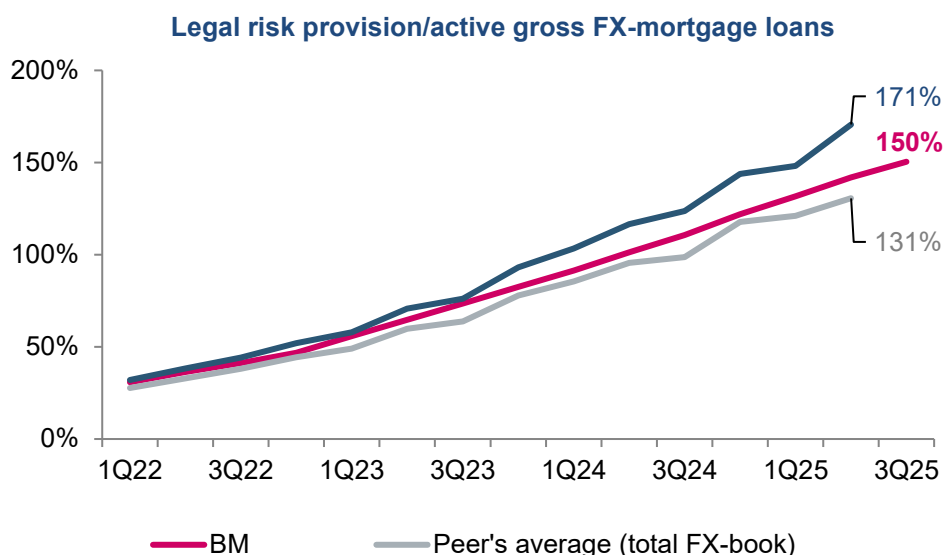
At the end of September, the balance sheet value of provisions for the portfolio originated by Bank Millennium was at the level of PLN6,938 million (an equivalent of 150% of the grossed-up active FX-mortgage book) and at PLN838 million for the portfolio originated by former Euro Bank. The y/y change of the balance of provisions for loans originated by Bank Millennium (drop of PLN734mn) contrasted with the respective 12-month P&L charge of PLN1,974 million. This was mainly due to the much increased use of these provisions which amounted to PLN2,584 million in the last 12-months. Allocated provisions, i.e. decreasing gross balance sheet value of the respective loan books, stood at PLN3,982 million for portfolio originated by Bank Millennium and PLN491 million for portfolio originated by former Euro Bank.

### Provisions against legal risk of FX-mortgage book (BM portfolio, PLNmnn)



(\*) actual outstanding B/S provisions not equal to the sum of P&L charges





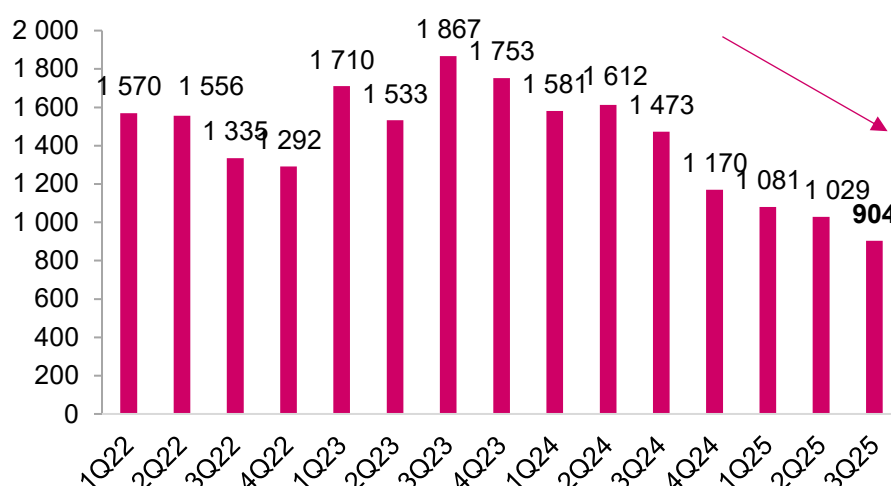
*Note: legal risk provisions/active gross FX mortgage book (post IFRS9 adjustments where necessary); excl. f. Euro Bank portfolio in case of BM*

### Claims against the Bank/Group

On September 30, 2025, the Bank had 18,950 loan agreements and additionally 2,334 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 court. A relatively small proportion of these (~23.0%) had been filed by borrowers who had repaid their FX-mortgages entirely or converted them into PLN mortgages at the date of submitting the court case (~29% at the end of September'25), although they represent a much higher share of recently filed cases (>50%).

3Q25 was another quarter when the number of active claims against the Bank dropped q/q, reflecting decelerating inflow of new cases, higher number of final verdicts and last but not least impact of amicable settlements of cases who were already during dispute in court. 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 3Q25 the number of new claims dropped to 904 cases, the lowest level since 1Q21. This compares with the quarterly average of ~1,500 in 2024 and 1,700+ cases quarterly in 2023.

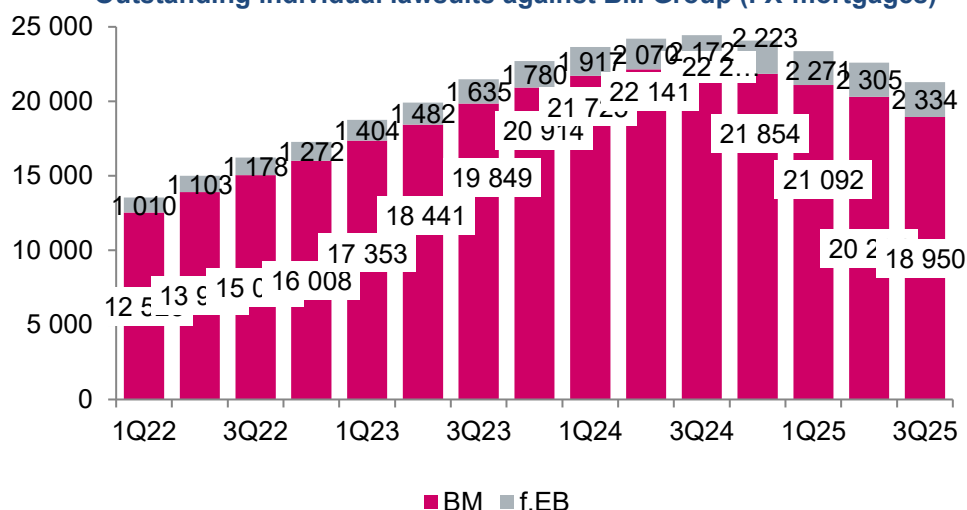
### New lawsuits against Bank Millennium\* (#)



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

Note: Number of claims may differ from the previously presented due to reclassification of c. 150 cases.

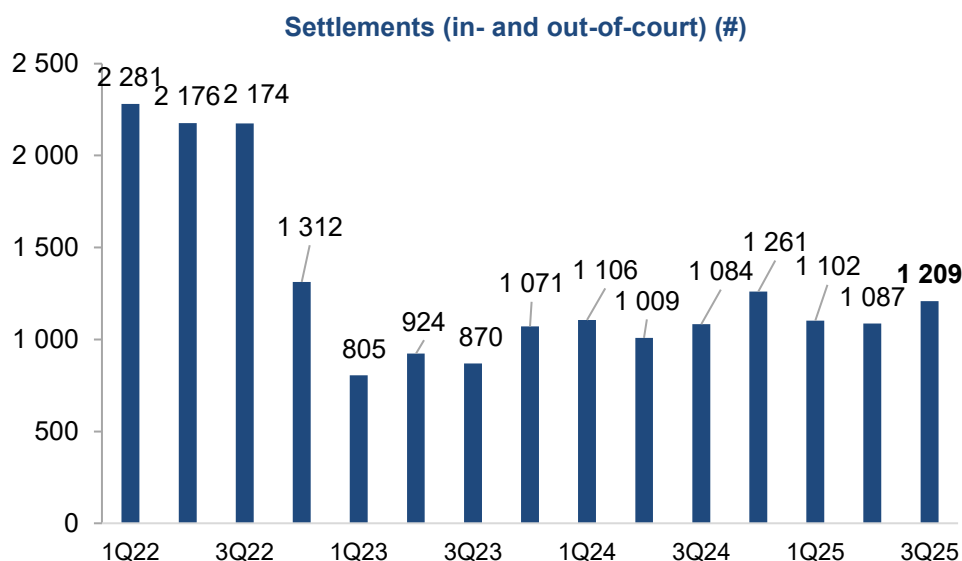
### Outstanding individual lawsuits against BM Group (FX-mortgages)



### 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 1,209 in 3Q25 (2Q25: 1,087, 1Q25: 1,102, 2024 overall: 4,458), the highest level this year, and again well exceeding the number of new cases filed against the Bank. Over 29,000 settlements were reached since early 2020 when a more intensive effort started. These represent over 48% 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 3Q25 the number of active FX-mortgage loans decreased by 2,477 to 17,779, following the drop by 2,245 in 2Q25 and by 2,072 drop in 1Q25 and 7,852 in 2024 overall.

The number and share of in-court settlements continued to increase. In 3Q25, 867 such settlements were achieved (71% of all settlements in the period), compared to 579 in 2Q25 (53%) and 515 in 1Q25 (47%) and 1,565 (35%) in 2024 overall.

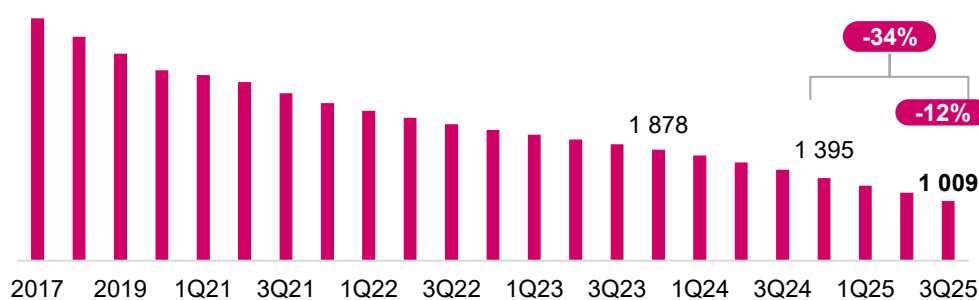


Note: values may differ from these previously presented

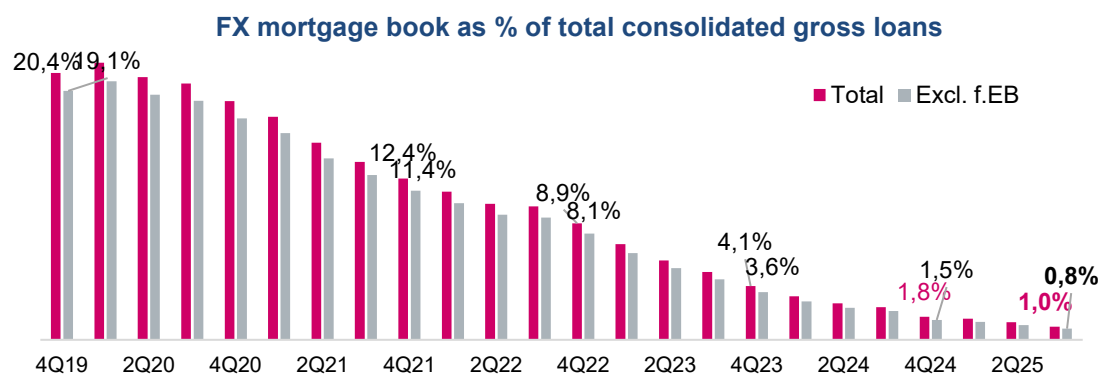
### FX-mortgage portfolio

As a result of these trends, the pace of BM's FX-mortgage portfolio's contraction remained high with q/q decrease rate at 10% and the y/y one at 34% (in CHF terms, gross, w/o 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 1.0% at the end of September'25, while the share of FX-mortgage loans originated by BM dropped to 0.8%.

### CHF mortgage portfolio (CHFmn) pre-provision\*



(\*) Originated by Bank Millennium and without the deduction of allocated legal risk provision



### Legal and court costs

Legal, court costs and additional cost of final verdicts, booked in admin costs, other operating costs and partially in the newly introduced P&L line, totalled PLN49 million before tax this quarter (9M25: PLN295 million) and were much lower than the comparable cost in 3Q24 and 9M25.

### Results adjusted for FX-mortgage related costs

Summing it all up, excluding all FX-mortgage related costs in 3Q25 (PLN442 million pre-tax / PLN399 million after tax) the BM Group would post 3Q25 net profit of PLN743 million with respective adjusted 9M25 net profit of PLN1,609 million. This compares against adjusted 3Q24 net profit of PLN796 million and 9M24 adjusted net profit of PLN2,359 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.

## FINANCIAL RESULTS IN DETAIL

### GROUP PROFIT AND LOSS ACCOUNT

<b>Net profit</b> (PLNmn)	<b>9M25</b>	<b>9M24</b>	<b>Change y/y</b>	<b>3Q25</b>	<b>2Q25</b>	<b>Change q/q</b>
Operating income	5,165	4,791	8%	1,749	1,749	0%
Operating costs	(1,897)	(1,656)	15%	(627)	(602)	4%
Impairment provisions and other cost of risk*	(194)	(307)	-37%	(113)	6	-
FX legal risk related provisions and settlement costs	(1,570)	(2,131)	-26%	(485)	(589)	-18%
Provision for credit holidays	-	(157)	-100%	-	-	-
Banking tax	(301)	(134)	125%	(101)	(101)	0%
Pre-tax profit	1,204	564	114%	424	463	-8%
Income tax	(349)	(17)	1947%	(79)	(132)	-40%
<b>Net profit – reported</b>	<b>855</b>	<b>547</b>	<b>56%</b>	<b>345</b>	<b>331</b>	<b>4%</b>
<b>Net profit – adjusted**</b>	<b>2,347</b>	<b>2,297</b>	<b>2%</b>	<b>743</b>	<b>886</b>	<b>-16%</b>

(\*) Impairment provisions for financial and non-financial assets including also fair value adjustment on loans (PLN0.4mn in 9M25 and PLN3.2mn in 9M24) 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 in 9M24) and hypothetical banking tax until the end of May 2024 and without negative impact of credit holidays (PLN157mn in 9M24)

<b>Group's operating income</b> (PLNmn)	<b>9M25</b>	<b>9M24</b>	<b>y/y</b>	<b>3Q25</b>	<b>2Q25</b>	<b>q/q</b>
Net interest income	4,318	4,025	7%	1,446	1,448	0%
Impact of credit holidays on Net interest income	0	(157)	-	0	0	-
Net interest income adjusted	4,318	4,182	3%	1,446	1,448	0%
Net commission income	575	589	-2%	204	188	9%
<b>Core income</b>	<b>4,892</b>	<b>4,614</b>	<b>6%</b>	<b>1,650</b>	<b>1,636</b>	<b>1%</b>
<b>Core income without credit holidays</b>	<b>4,892</b>	<b>4,771</b>	<b>3%</b>	<b>1,650</b>	<b>1,636</b>	<b>1%</b>
Other non-interest income*	273	177	54%	99	112	-12%
<b>Total operating income</b>	<b>5,165</b>	<b>4,791</b>	<b>8%</b>	<b>1,749</b>	<b>1,749</b>	<b>0%</b>
<b>Total operating income adjusted**</b>	<b>5,129</b>	<b>5,098</b>	<b>1%</b>	<b>1,688</b>	<b>1,750</b>	<b>-4%</b>

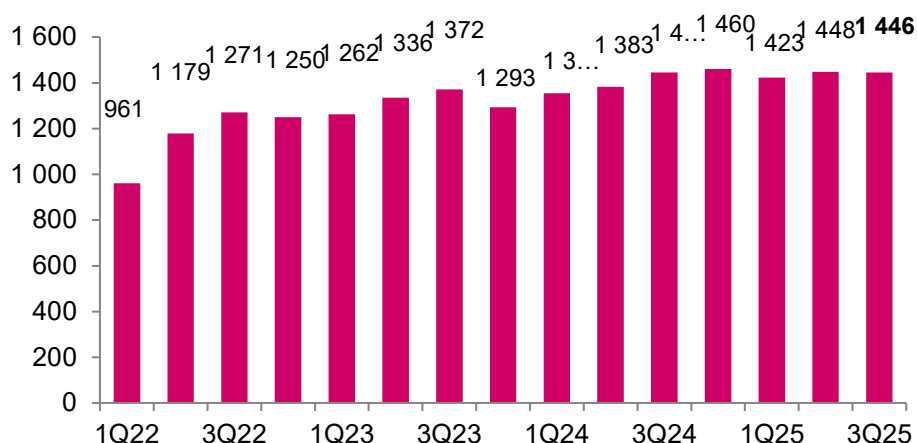
(\*) Without fair value adjustment of credit portfolio (PLN0.4mn in 9M25 and PLN3.2mn in 9M24), which is included in the cost of risk line

(\*\*) Without extraordinary items, i.e. FX mortgage loan related costs/incomes (in other operating income/cost including indemnity from Societe Generale) and negative impact of credit holidays (PLN157mn in 9M24)

**Net interest income (NII)** in 3Q25 without credit holiday impact last year was flat vs. 3Q24 at PLN 1,466mn (a drop of 3% on reported basis). The NII showed resilience compared to the 98bps y/y drop of quarterly average 3M WIBOR. NII was flat q/q while 3M WIBOR dropped 47bps to 4.88%. Interest income was marginally down y/y on reported basis as the impact of lower NIM (contracting yield on loans outweighed flat yield on bonds and falling deposit costs) outweighed higher interest earning assets (IEAs) while interest costs were marginally up.

9M25 NII totalled PLN6,848mn and was up 7% y/y on reported basis and up 3% y/y w/o 2024 credit holiday effect. Average 3M WIBOR in 9M25 was 5.36% vs. 5.86% in 9M24. Interest income was up 6% y/y on reported basis or up 3% while adjusted for credit holidays with interest income from bonds behind the growth. Interest cost was up 3% y/y with deposit costs lower y/y but higher other funding costs with EUR500mn issue in September'24 and cost of asset securitisations being major reasons.

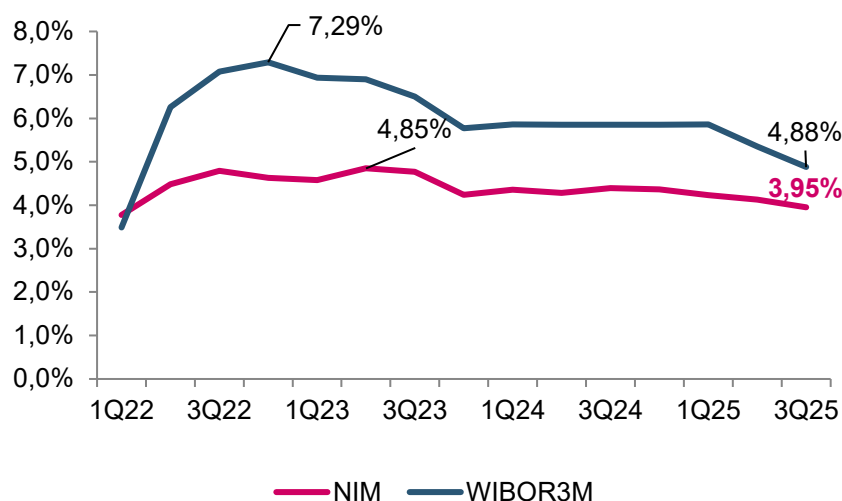
#### NII excluding cost of credit holidays (PLNmn)



**Net interest margin (over average interest earning assets) (NIM)** averaged 3.95% in 3Q25 and was 18bps lower vs. the previous quarter and 44bps vs. 3Q24. Corresponding drops of average 3M WIBOR in respective periods were 47bps and 98bps.

9M25 NIM averaged 4.10% and was 26bps lower compared to 9M24 level, while the respective drop of average 3M WIBOR was 50bps. 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 22 bps during 12 months to 2.04% in 3Q25) 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 3Q25 grew 9% q/q and with loan, card and bancassurance fees contributing most to the improvement.

9M25 net fees totalled PLN578mn and was 2% lower y/y mostly on lower bancassurance fees (down 54% 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 be up 9% y/y with the strongest 30% y/y generated by fees from investment products and 22% growth in card fees.

**Reported core income**, defined as a combination of net interest and net commission income, was slightly up in the quarter and down 2% y/y.

9M25 reported core income reached PL4,892mn and grew 6% y/y. Adjusted for the impact of credit holidays in 2024 the y/y growth rate would be 3%.

**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 PLN273mn in 9M25 and grew 54% y/y partly due to positive effects from the sale of a real estate and the revaluation of a participation in a company in 2Q25. Some costs related to court cases against FX mortgage loans borrowers (PLN139mn in 9M25, down from PLN293mn in 9M24) were booked in other operating costs and continued to negatively impact this line.

**Total operating income** of the Group reached PLN1,750mn in 3Q25, was flat q/q and down 2% y/y on a reported basis, 9M25 level amounted to PLN5,166 and was up 8% y/y.

**Total costs** amounted to PLN627mn in 3Q25, translating into a 13% increase y/y. Excluding BFG fees the y/y growth would be lower at 10%. 9M25 costs amounted to PLN1,897mn and were up 15% y/y, while the growth rate without BFG costs would be 11%.

<b>Operating costs</b> <i>(PLNmn)</i>	<b>9M25</b>	<b>9M24</b>	<b>y/y</b>	<b>3Q25</b>	<b>2Q25</b>	<b>q/q</b>
Personnel costs	(1,008)	(887)	14%	(339)	(347)	-2%
Other administrative costs*	(889)	(769)	16%	(288)	(255)	13%
<i>of which Banking Guarantee Fund (BFG) fees</i>	(131)	(61)	115%	(18)	(18)	0%
<b>Total operating costs</b>	<b>(1,897)</b>	<b>(1,656)</b>	<b>15%</b>	<b>(627)</b>	<b>(602)</b>	<b>4%</b>
<i>Total costs without BFG</i>	<i>(1,766)</i>	<i>(1,595)</i>	<i>11%</i>	<i>(609)</i>	<i>(584)</i>	<i>4%</i>
Cost/income – reported	36.7%	34.6%	2.2%	35.8%	34.4%	1.4%
<i>Cost/income – adjusted **</i>	<i>35.1%</i>	<i>30.5%</i>	<i>4.6%</i>	<i>37.2%</i>	<i>33.9%</i>	<i>3.3%</i>

(\*) Include depreciation and amortisation

(\*\*) without extraordinary income or cost and with linear distribution of BFG resolution fund fee throughout the year

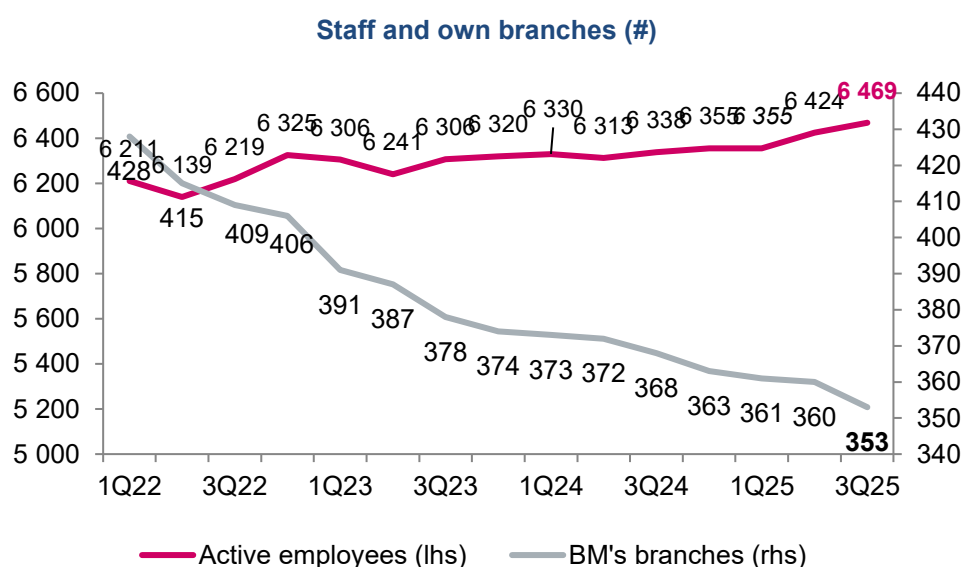
**Personnel costs** amounted to PLN339mn in 3Q25 and their y/y growth moderated to 12% from 23% in 2Q2Q. The 2% q/q drop was driven by a partial release of PLN14mn provision for unused holidays created in 2Q25.

9M25 personnel costs totalled PLN1,008mn and increased 14% y/y, mainly as a result of wage inflation feeding through 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 September 2025, the total number of own branches stood at 353 units with the y/y reduction at 15 units. Total Group's FTE's at the end of September 2025 amounted to 6,824, up 2% y/y and up 1% q/q. Without employees absent due to long leaves ('active FTEs'), the headcount was lower at 6,469 staff and grew at similar y/y and q/q rates of 2% and 1% respectively.



<b>Employment (FTEs)</b>	<b>30.09.2025</b>	<b>30.09.2024</b>	<b>Change y/y</b>	<b>30.06.2025</b>	<b>Change q/q</b>
Bank Millennium S.A.	6,548	6,434	2%	6,509	1%
Subsidiaries	276	262	6%	277	0%
<b>Total Bank Millennium Group</b>	<b>6,824</b>	<b>6,696</b>	<b>2%</b>	<b>6,786</b>	<b>1%</b>
<b>Total BM Group (active* FTEs)</b>	<b>6,469</b>	<b>6,338</b>	<b>2%</b>	<b>6,424</b>	<b>1%</b>

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



**Other administrative costs** (including depreciation) reached PLN288mn in 3Q25 and increased by 15% y/y. Higher IT and regulatory costs were the main reasons for the y/y growth. In contrast, advisory costs including legal costs were significantly lower than in the same period last year. The q/q growth of 4% and was mainly driven by a positive impact of a seasonal cost settlement with card company in 2Q25 (PLN37mn) presented in 'other cost' line but going forward this positive impact is likely to be lower due to the change of terms.

In 9M25 other administrative costs totalled PLN889mn and were 16% higher y/y. More than doubling costs of contributions to the Banking Guarantee Fund (BFG) (+ PLN70mn 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 (PLN55mn) 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 7%. Among the key groups of costs, the higher annual increase could be witnessed in IT and telecommunication costs. Legal and advisory costs were still a material item within other administrative costs. Legal costs relating to FX-mortgage portfolio remained significant (PLN76mn) but decreased visibly - 12% - y/y.

**Cost-to-income ratio (C/I)** for 3Q25 stood at 35.8% (reported) compared to 34.4% in 2Q25 and 31% in 3Q24. Cost-to-income ratio without extraordinary items mentioned above (mainly the cost of credit holidays and legal costs related to litigations/settlements with FX mortgage borrowers and with an even allocation of BFG costs) stood at 37.2% vs. 33.9% and 30.7% respectively.

9M25 reported cost-to-income ratio reached 36.7% vs. 34.6% in 9M24, while the adjusted one 35.1% vs. 30.5% respectively.

**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 increased to PLN113mn in 3Q25 from a negative PLN8mn in 2Q25. The change was driven by a low base effect (PLN86mn gain on sale of NPLs in 2Q25) and only small changes in risk models. Additionally, provisions for non-financial assets saw PLN10mn charge which was chiefly related to post court verdict FX-mortgage related receivables.

Total NPL ratio marginally improved to 4.18% from 4.22% at the end of June 2025 and 4.63% at the end of September 2025. Retail NPL ratio marginally increased to 4.3% from 4.25% at the end of June 2025 and dropped compared to 4.56% at the end of September 2025, while in the corporate segment it dropped to 3.7% from end of 2Q25 level 4.1% and end of 3Q24 level of 4.9%. Cost of risk in bps (i.e. net charges to average gross loans) in 3Q25 amounted to 53bps vs. -3bps in 2Q25 and 58bp in 3Q24.

9M25 risk charged totalled PLN194mn vs. PLN307mn in 9M24, with improving risk profile and higher gains from NPL sales (PLN86mn vs. PLN45mn). Retail segment charges totalled PLN84mn vs. PLN231mn in 9M24, while corporate/other PLN109mn vs. PLN76mn respectively. In basis points, 9M25 total risk charge stood at 32bps vs. 9M24 cost of 53bps, with retail segment risk charge at 19bps vs. 51bps and corporate/other at 79bps vs. 60bps respectively.

**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 3Q25 they amounted to PLN485mn (including provisions for loans originated by former Eurobank) vs. PLN589mn in 2Q25 and PLN698mn in 3Q24, while 9M25 charges totalled PLN1,570mn vs. PLN2,131mn in 9M24. More details on FX-mortgage related charges and costs are presented in the preceding chapter of this report.

The Group reported **net profit** of PLN345mn in 3Q25, 4% higher than in 2Q25 and 82% above the level in 3Q24. The q/q improvement was largely driven by lower CIT (see tax comment in note 11 of this report for details), while the y/y improvement was driven by better core operating performance and much lower FX-mortgage related costs. Adjusted for extraordinary items (i.a. FX-mortgage related costs and associated tax impacts) the Group would achieve net profit of PLN743mn in the period vs. PLN886mn in 2Q25 and PLN796mn in 3Q24.

9M25 reported net profit totalled PLN855mn and was 56% above the level in comparable period of the previous year. The improvement was driven by a number of factors such as improving core operating performance, lower FX-mortgage charges and no banking tax charge in the first five months of 2024. Adjusted, 9M25 net profit amounted to PLN2,347mn, 2% above the PLN2,297mn in 9M24.

## BALANCE SHEET

### Assets

**The Group's assets** as at 30 September 2025, amounted to PLN152,686mn, recording growth of 10% vs. the end of December 2024. The structure of the Group's assets as well as changes of their particular components are presented in the table below:

<b>Group's Assets</b> (PLN million)	<b>30.09.2025</b>	<b>31.12.2024</b>	<b>Change ytd</b>	<b>30.09.2024</b>	<b>Change y/y</b>
Cash and operations with the Central Bank	4,941	5,179	-5%	7,092	-30%
Loans and advances to banks	499	435	15%	418	19%
Loans and advances to clients	74,729	74,975	0%	75,524	-1%
Receivables from securities bought with sell-back clause	583	194	200%	216	170%
Debt securities	67,774	54,207	25%	48,268	40%
Derivatives (for hedging and trading)	190	256	-26%	458	-59%
Shares and other financial instruments*	233	147	58%	166	40%
Tangible and intangible fixed assets**	1,132	1,067	6%	1,060	7%
Other assets	2,606	2,494	5%	2,404	8%
<b>Total assets*</b>	<b>152,686</b>	<b>138,954</b>	<b>10%</b>	<b>135,607</b>	<b>13%</b>

(\*) 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 PLN19.5bn or 40%). Similarly, in the last nine months, the growth of debt securities portfolio was also significant reaching PLN13.6bn or 25%.

### *Loans and advances to clients*

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

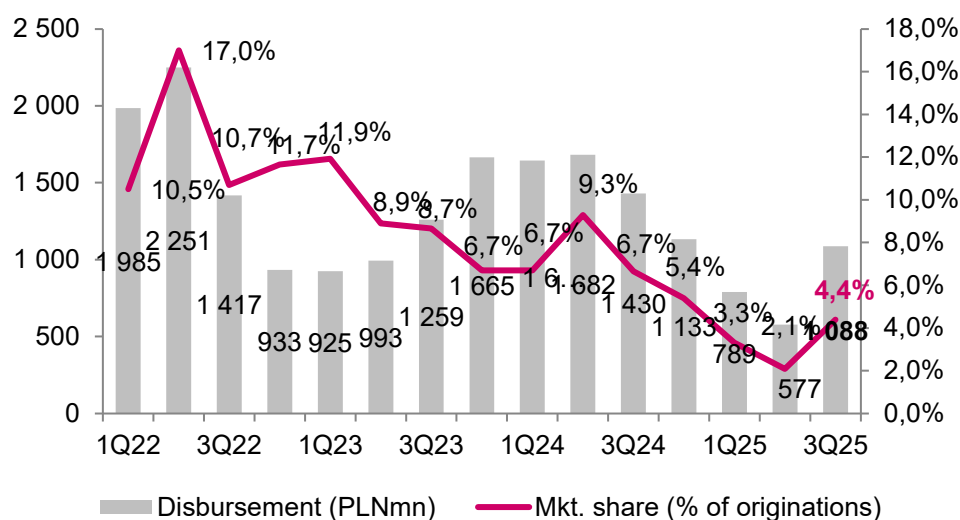
<b>Loans and advances to clients (PLNmn)</b>	<b>30.09.2025</b>	<b>31.12.2024</b>	<b>Change ytd</b>	<b>30.09.2024</b>	<b>Change y/y</b>
Loans to households	54,604	56,935	-4%	57,594	-5%
- <i>PLN mortgage loans</i>	35,070	37,321	-6%	37,548	-7%
- <i>FX mortgage loans</i>	728	1,314	-45%	1,849	-61%
- <i>of which Bank Millennium loans</i>	617	1,127	-45%	1,630	-62%
- <i>of which f.Euro Bank loans</i>	111	187	-41%	219	-50%
- <i>consumer loans</i>	18,806	18,301	3%	18,196	3%
Loans to companies and public sector	20,125	18,040	12%	17,948	12%
- <i>leasing</i>	7,130	6,948	3%	6,854	4%
- <i>other loans to companies and factoring</i>	12,995	11,092	17%	11,094	17%
<b>Net loans &amp; advances to clients</b>	<b>74,729</b>	<b>74,975</b>	<b>0%</b>	<b>75,542</b>	<b>-1%</b>
<i>Net loans and advances to clients excluding FX mortgage loans</i>	74,002	73,661	0%	73,693	0%
Impairment write-offs	2,518	2,514	0%	2,607	-3%
<b>Gross* loans and advances to clients</b>	<b>77,247</b>	<b>77,490</b>	<b>0%</b>	<b>78,150</b>	<b>-1%</b>

(\*) 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.

Total **net loans** of Bank Millennium Group reached PLN 74,729 million as of September 2025, showing flat performance in the last twelve months and a slight 1% drop since the beginning of the year. Loans excluding FX mortgage loans were flat y/y and year to date. FX mortgage loans net of provisions decreased significantly over the last twelve months (down 45%), 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 2.2% 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.

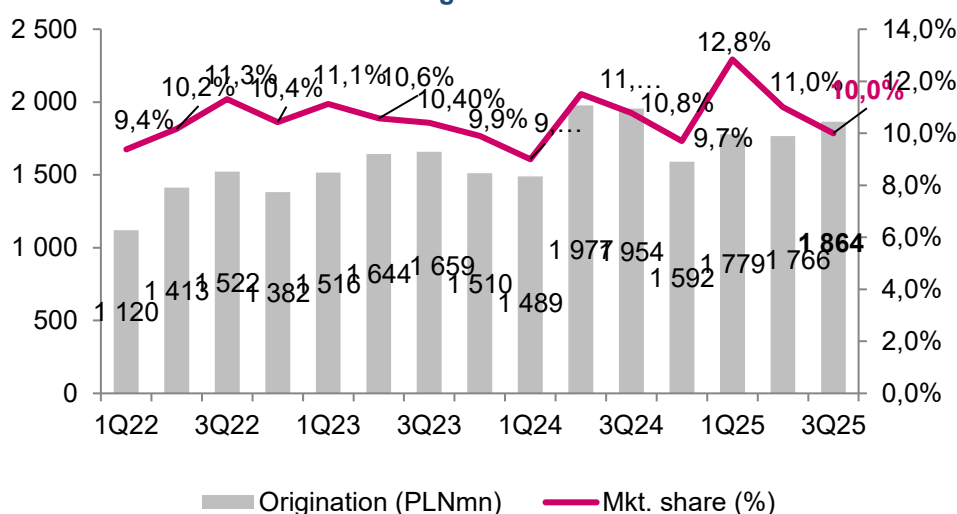
The net value of loans to households amounted to PLN 54,604 million on September 30 2025, reflecting a decrease of 4% y/y and a 5% drop since the beginning of the year. The contraction of this this portfolio was primarily due to the decline in the value of mortgage loans, both FX and PLN. Within the household loan segment, PLN mortgage loans amounted to PLN35,070 million and decreased by 6% y/y and 7% since the beginning of the year. Accelerating prepayments and low origination in 1H25 (PLN1.4 billion, down 59% y/y) were the main reasons for these dynamics. 3Q25 brought a noticeable increase of origination to nearly PLN1.1 billion, however.

### 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 reached PLN18,806mn on 30 September 2025, increasing by 3% y/y and 3% since the beginning of the year. Origination of consumer loans was high and stable y/y in 9M25, reaching PLN5.4 billion which despite relatively high turnover of the portfolio translated into a 3% y/y growth of non-mortgage retail loans.

### Cash loans: origination and market share



The net value of companies exposures amounted to PLN 20,125 million on 30 September 2025, showing a strong 12% growth y/y and nearly 12% since the beginning of the year). The growth of the loan portfolio was mostly visible in corporate loans sub-segment (up 17% y/y and year to date), while leasing portfolio increased 4% y/y and 3% year to date.

### Debt securities

Value of debt securities reached PLN67,734 million on 30 September 2025, which means a significant increase of 40% y/y and a 25% growth year to date.

A dominant part of the debt securities portfolio (86%) 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 assets/liabilities and interest margin management policy and was correlated with the much stronger growth of deposits versus loans. The share of this group of debt securities in the consolidated total assets was at 44% vs. 40% 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 further parts of the report in particular in Chapter 5.4. "Liquidity Risk".

#### *Deposits, loans and advances to banks*

Deposits, loans and advances to banks (including interbank deposits) stood at PLN494 million at the end of September 2025, which means an increase by 19% y/y (and a growth by 15% year to date) and it mainly refers to current accounts balances.

### **Liabilities**

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

<b>Liabilities and equity</b> <i>(PLN million)</i>	<b>30.09.2025</b>	<b>31.12.2024</b>	<b>Change ytd</b>	<b>30.09.2024*</b>	<b>Change y/y</b>
Deposits from banks	193	204	-6%	223	-14%
<b>Deposits from customers</b>	<b>128,186</b>	<b>117,257</b>	<b>9%</b>	<b>113,981</b>	<b>12%</b>
Liabilities from securities sold with buy-back clause	133	194	-31%	216	-39%
Financial liabilities valued at fair value through P&L and hedging derivatives	788	519	52%	757	4%
Liabilities from issue of debt securities	6,764	6,125	10%	5,594	21%
Provisions	3,600	2,952	22%	2,823	28%
Subordinated debt	1,556	1,562	0%	1,560	0%
Other liabilities*	2,658	2,369	12%	2,808	-5%
<b>Total liabilities</b>	<b>143,878</b>	<b>131,182</b>	<b>10%</b>	<b>127,962</b>	<b>12%</b>
<b>Total equity</b>	<b>8,808</b>	<b>7,772</b>	<b>13%</b>	<b>7,645</b>	<b>15%</b>
<b>Total liabilities and equity</b>	<b>152,686</b>	<b>138,954</b>	<b>10%</b>	<b>135,607</b>	<b>13%</b>

(\*) including tax liabilities

At the end of September 2025 liabilities accounted for 94%, while equity of the Group - for 6% of total liabilities and equity.

As on 30 September 2025 Group's total liabilities amounted to PLN143,878 million and were 10% higher relative to their value as on 31 December 2024. The main change to liabilities resulted from considerable increase of customer deposits by PLN10.9 billion or 9% during the first nine months of this year.

#### *Customers' deposits*

Customer deposits constituted the main item of the Group's liabilities accounting for, as on 30 September 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.

**Total customer deposits** amounted to PLN128,186 million on 30 September 2025 and grew 12% y/y and 9% year to date. Deposits of individuals reached PLN94,178 million on 30 September 2025 and posted high growth of 11% y/y and 8% year to date. The growth evolved very positively in terms of its

structure: term deposits from retail clients grew by 6% y/y whereas current and saving accounts grew by a high 14% y/y.

Deposits of companies and public sector, which reached PLN34,008 million on September 30 2025, increased 15% y/y due to a relatively strong growth in term deposits from companies, whereas current account deposits grew by 12% y/y.

Share of term deposits marginally increased in the quarter and stood at 35% of total deposits at the of September 2025.

Loan to deposit (L/D) ratio decreased to a new all-time low of 58% at the end of September 2025.

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

<b>Customer deposits</b> <i>(PLN million)</i>	<b>30.09.2025</b>	<b>31.12.2024</b>	<b>Change ytd</b>	<b>30.09.2024</b>	<b>Change y/y</b>
Deposits of individuals	94,178	87,567	8%	84,530	11%
Deposits of companies and public sector	34,008	29,690	15%	29,451	15%
<b>Total deposits</b>	<b>128,186</b>	<b>117,257</b>	<b>9%</b>	<b>113,981</b>	<b>12%</b>

#### *Deposits from banks*

Deposits from banks, including credits received, as on 30 September 2025, amounted to PLN193 million. Value of this item decreased by 6% 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.

#### *Provisions*

The value of provisions as on 30 September 2025 was PLN3,600 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 PLN3,453 million.

#### *Debt securities issued*

Securities issued by the Group amounted to PLN6,764 million as on 30 September 2025 recording significant increase by, PLN639 million relative to the balance as on 31 December 2024. The increase resulted mainly from the PLN800 million issue of covered bonds issued by Millennium Bank Hipoteczny, the Bank's subsidiary.

In December 2022 the Bank issued Credit Link Notes ('CLNs') in the amount of PLN242.5mn within a synthetic securitisation transaction related to corporate loans. Additionally, in 2023 as a part of synthetic securitisation transaction, the Bank issued PLN489mn worth of CLNs, while Millennium Leasing (a subsidiary of the Bank) issued PLN280mn worth of CLNs. In 2024 and in 9M25 the Bank redeemed part of its CLNs in the amount of PLN184.7mn. Total value of CLNs outstanding on 30 September 2025 stood at PLN827mn.

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 9M25 it issued covered bonds of total nominal value of PLN800 million.



### *Subordinated debt*

The value of subordinated debt amounted to PLN1,556 million on 30 September 2025, and remained at almost the same level vs. 30 June 2025 (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 30 September 2025, equity of the Group amounted to PLN8,809 million and recorded an increase by PLN1,163 million or 15% y/y (up 13 year to date). Apart from net profit generated in 12 months period (PLN1,028 million), the increase of equity was supported by positive impact of other comprehensive income items, mainly valuation of bonds and, to lesser extent, shares and hedge instruments.

Information on capital adequacy is presented in further part of this document and in particular in the report in Chapter 5.6 "Capital Management" of the Condensed Interim Consolidated Financial Statements of the Bank Millennium S.A. Capital Group for the 9 months ended 30 September 2025 part of this report.

## **LIQUIDITY, ASSET QUALITY AND SOLVENCY**

The liquidity position of Bank Millennium Group remained very strong in 3Q25. LCR ratio reached the level of 374% at the end of September 2025, well above the supervisory minimum of 100%. Loan-to-deposit ratio remained at secure level of 58% and the share of liquid debt securities (mainly bonds issued by the sovereigns, European Union, multilateral development banks and NBP bills) in the Group's total assets remains significant at 44%.

<b>Group loans quality and liquidity indicators (PLNmn)</b>	<b>3Q25</b>	<b>4Q24</b>	<b>Change</b>
Total impaired loans	3 228	3 450	-221
Impairment provisions	2 512	2 503	9
FV adjustment	6	11	-5
Total impairment provisions and FV adjustment	2 518	2 514	4
Impaired over total loans ratio (%)	4.2%	4.5%	-0.27pp
Loans past-due over 90 days /total loans (%)	2.3%	2.2%	0.06pp
<b>Coverage ratio</b> (Total provisions + FV adjustment/impaired loans) (%)	78.0%	72.9%	5.11pp
Total provisions and FV adjustment/loans past-due (>90d) (%)	144.4%	147.9%	-3.54pp
<b>Liquidity Coverage Ratio (LCR) for Group</b>	374%	371%	3pp

The Group continued to exhibit a very good asset quality: the share of impaired loans in total loan portfolio remained at the low level of 4.18%. The share of loans past-due more than 90 days in total portfolio slightly increased from 2.19% to 2.26% at the end of September 2025.

The impaired loan ratio in mortgage portfolio decreased from 2.29% to 2.22% at the end of September 2025, in other retail from 8.16% to 7.68%, while in the leasing portfolio increased from 4.86% to 4.94%. In corporate portfolio the ratio has improved from 4.50% to 2.80%.



Coverage ratio of impaired loans increased from 72.89% to 78.00%. Coverage of loans past-due by more than 90 days decreased during this year from 147.91% to 144.37%.

## Solvency

The Bank and the Group are obliged by law to meet minimum own funds and leverage ratio requirements, set in art. 92 of the Regulation (EU) 575/2013 of the European Parliament and of the Council as of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012 (CRR III).

<b>Main capital indicators</b> <i>(PLNmn)</i>	<b>3Q25</b>	<b>3Q24</b>	<b>Change</b> <b>y/y</b>	<b>2Q25</b>	<b>Change</b> <b>q/q</b>
Risk-weighted assets (RWA) Group	53 489	44 208	9 281	51 099	2 390
Risk-weighted assets (RWA) Bank	48 464	40 530	7 934	46 726	1 738
Own funds requirements for Group	4 279	3 537	743	4 088	191
Own funds requirements for Bank	3 877	3 242	635	3 738	139
Own funds for Group	8 543	7 929	614	7 963	580
Own funds for bank	8 118	7 521	597	7 608	510
<b>Total Capital Ratio (TCR) for Group</b>	<b>15.97%</b>	<b>17.94%</b>	<b>-1.97pp</b>	<b>15.58%</b>	<b>0.39pp</b>
Minimum required level TCR	11.75%	13.81%	-2.06pp	10.75%	1.00pp
Total Capital Ratio (TCR) Bank	16.75%	18.56%	-1.81pp	16.28%	0.47pp
Tier 1 ratio for Group	<b>14.36%</b>	<b>15.30%</b>	<b>-0.94pp</b>	<b>13.75%</b>	<b>0.61pp</b>
Minimum required level T1	9.75%	11.45%	-1.70pp	8.75%	1.00pp
Tier 1 ratio for bank	14.98%	15.68%	-0.70pp	14.28%	0.70pp
<b>Common Equity Tier 1 (=T1) ratio for Group</b>	<b>14.36%</b>	<b>15.30%</b>	<b>-0.94pp</b>	<b>13.75%</b>	<b>0.61pp</b>
Minimum required level CET1	8.25%	9.67%	-1.42pp	7.25%	1.00pp
Common Equity Tier1 (=T1) ratio for Bank	14.98%	15.68%	-0.70pp	14.28%	0.70pp
<b>Leverage Ratio (LR) for Group</b>	<b>5.01%</b>	<b>4.82%</b>	<b>0.19pp</b>	<b>4.65%</b>	<b>0.36pp</b>

In 3Q25, capital ratios improved - Tier 1 capital ratio (equal to Common Equity Tier 1 capital ratio) increased by 61bps, and total capital ratio by 39bps. T1 capital (CET1) increased by PLN 657 million (by 9.3%), which resulted primarily from the inclusion of net profit for the first half of 2025. At the same time, risk-weighted assets (RWA) increased by PLN 2,383 million (by 4.7%), which resulted from the increase in portfolio. Total own funds increased by PLN 580 million (by 7.3%).

The leverage ratio increased in 3Q25 by 36bps from 4.65% to 5.01%, which was mainly due to an increase in the T1 capital measure (by 9.3%), while the exposure measure increased by 1.5%. The excess over the regulatory minimum of 3% amounts to 201bps.

Minimum required level of capital includes:

- Pillar II RRE FX buffer - in accordance with KNF decisions from January and February 2025 P2R is 0.0%;
- 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 KNF every year,
- Systemic risk buffer at the level of 0%, reduced from 3% in March 2020,
- Countercyclical buffer at the 1% level in force from 25 September 2025; it will be increased to 2% from 25 September 2026.

In December 2024, the Bank received a letter from the Polish Financial Supervision Authority (KNF) not to impose an additional capital charge (P2G).

The minimum capital ratios required by the KNF in terms of the combined buffer requirement (OCR) and together with the additional P2G surcharge, are achieved with a significant surplus at the end of 1Q2025.

## MREL REQUIREMENTS

In terms of MRELTrea and MRELtem requirements, the Group is in excess of the minimum required levels as of 30 September 2025, and is also in compliance with the MRELTrea Requirement after including the Combined Buffer Requirement.

MRELTrea increased slightly to 25.51% (25.27% at end-June 2025), with a large excess above the required level (19.11% including CBR). MRELtem increased to 8.83% (8.56% at end-June 2025), also significantly above the required level of 5.91%.

## LONG-TERM FUNDING RATIO (LTFR)

According to the recommendation of the Polish Financial Supervision Authority from July 2024, banks will be required to maintain a Long-Term Funding Ratio (LTFR) of at least 40% from December 31, 2026. During 3Q2025 the LTFR for the Group was fluctuating at the level of around 33%. The Group intends to meet the requirements of the aforementioned recommendation through a series of actions, including issuance of mortgage-covered bonds by its the mortgage bank subsidiary - Millennium Bank Hipoteczny (MBH).

In June 2024 year, MBH conducted its first issuance of mortgage-covered bonds. In 2024 year, the total issuance had a total nominal value of PLN800 million directed at institutional investors. In March 2025 MBH conducted next 5-year covered bond, with a total nominal value of PLN800 million, which again was directed at institutional investors. The total demand exceeded PLN1.4 billion. The issuance date of the covered bonds was March 12, 2025, and their maturity date is March 12, 2030. The instruments were priced in the book-building process at 89 basis points above the 3M WIBOR rate.

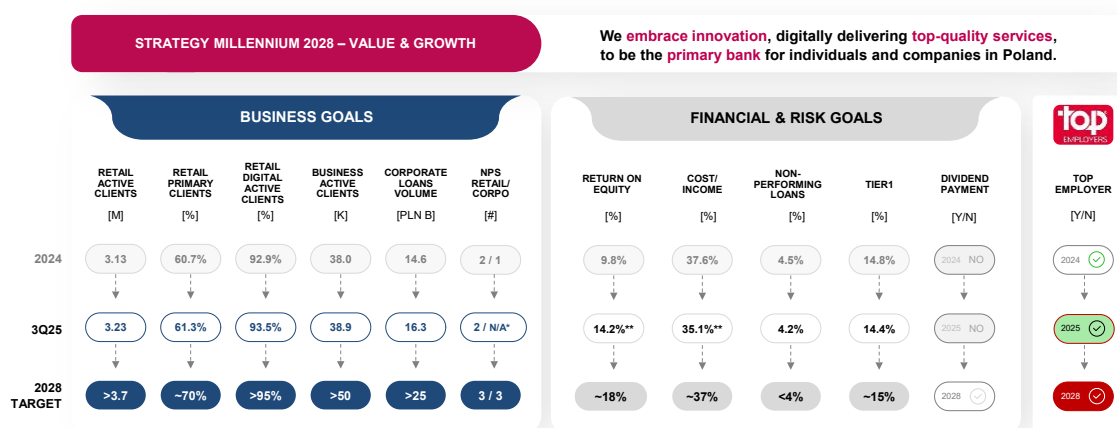
The bonds were assigned a rating of AAA with a stable outlook by the Fitch rating agency.

## STRATEGY IMPLEMENTATION

Strategy of Bank Millennium and the Bank Millennium Group – **“Strategy 2028: Value and Growth”** is a development plan for the coming years, focused on sustained growth in the retail segment, strengthening the Bank’s position in the medium and large enterprises segment, and improving profitability. The Bank prioritizes digitalization, the expansion of its product offering, including investment and savings product, and the continuous enhancement of customer service quality.

In the third quarter of 2025, the Bank continued the implementation of strategic initiatives and actively monitored key business and financial goals.

### Strategy 25-28: On the way through the strategic objectives of the ‘Value & Growth’ strategy



(\*) 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.

During the reporting period, a number of implementations were carried out to support the needs of both retail and corporate clients. The number of active digital users using the mobile app and online banking exceeded 3 million, marking a significant milestone in the execution of the **“Value & Growth”** strategy, under which the bank aims to have over 95% digitally active clients by 2028.

As part of the “To be and have” campaign launched in the third quarter, young influencers are promoting banking products such as the Millennium 360° Account, Profit Savings Account, and the mobile app, showcasing their practical applications. New features introduced in the mobile app include the ability to purchase eSIM cards with international data packages and to order cash delivery to a branch. Thanks to these new mobile functionalities, clients can now verify their identity on public administration and commercial platforms using biometrics or a PIN code. A new product, the “Your Goal” Savings Account, was also introduced, enabling convenient and automatic saving. Clients who save regularly benefit from higher interest rates.

In the area of corporate banking, Bank Millennium was one of the first institutions on the market to implement a digital e-signature in leasing area, enabling the leasing agreement process to be completed fully online. To expand its offering, the bank introduced the Development Loan. Corporate clients can also benefit from a multi-currency feature, allowing payments to be made directly from foreign currency accounts without the need for currency conversion. Companies that meet specific environmental criteria have access to KUKE S.A. green guarantees, which serve as loan collateral and facilitate access to financing.

Bank Millennium also continued its social and cultural activities, as well as support for employee initiatives. As part of its cultural patronage, the bank once again sponsored the “Złota Tarka” jazz festival. Another edition of the employee volunteer program “Our People” was also launched.

## BUSINESS TRENDS AND HIGHLIGHTS

**Bank Millennium cares about building positive customer experience at every stage of their cooperation with the Bank.** Quality of experience is a fundamental premise in product and service design and after-sales service – across all contact channels.

**The goal set out in Bank Millennium's strategy is to strengthen its position in the TOP3 of the best banks in Poland in terms of quality, measured by NPS – both in the retail and corporate banking segments.**

**For years, Bank Millennium has been consistently striving to ensure that the transition of customers to electronic service supports the quality of relations with the bank.** We combine mobile app service with access to qualified telephone and branch advisors - in all business lines. The service of remote advisors 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 implements projects focused on the customers' perspective in the area of education and security.

**Bank Millennium used research and qualitative and quantitative monitoring to support business projects.** Key areas of customer experience improvement, measured, among others, by NPS indicator, are diagnosed, prioritized, and forwarded to implementations on a continuous basis.

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

- satisfaction and loyalty monitoring,
- brand awareness among customers,
- evaluation of product concepts,
- employees' perspective.

**Bank Millennium has been conducting activities that directly affect customer satisfaction.** We use the model of working with the voice of the customer in the retail network, which includes:

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

We analyze the collected voice of the customer and work to eliminate the causes of dissatisfaction to improve the customer experience even more.

**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.

**Bank Millennium continues to work on simplifying the language of communication and the content of documents.** We change the texts provided to customers from the moment they open an account, to the information on how to operate their products.

**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 carried out training sessions during which employees could learn about the topic of accessibility and the guidelines to be followed during customer service and when creating documents.

## RETAIL BANKING

In 3Q25, the Bank increased its active client base by over 41 thousand. On September 30, 2025 the Bank provided services to over 3.23 million active retail clients.

Sale of current accounts in 3Q25 reached the level of almost 116 thousand, an increase over 14% vs. the previous quarter. The key product supporting acquisition of new clients was the Millennium 360° account.

3Q25 was another period of stable growth in the volume of retail deposits. Maintained relatively high interest rates on term deposits and savings accounts encouraged customers to take advantage of promotional offers. As a result, the Bank increased the volume of retail customer deposits in 3Q25 by PLN3.0 billion. This translated into a retail deposit balance of PLN97.3 billion at the end of September 2025. The Bank still enhanced its marketing communication regarding the savings offer and continued to acquire new volumes based on the Profit Savings Account (KO Profit) with attractive interest rates for new funds. Additionally in July, Bank released fully digitalized Goal Saving accounts which promote regular savings and enable collecting funds for individual and personalized goals.

In 3Q25, Bank Millennium concluded new contracts of mortgage loans with a total value of over PLN1.2 billion. The result placed the Bank with a market share in sales of 4.4%. The offer includes mortgage loans with a periodically fixed interest rate for the first 5 years. The Bank's lending operation was based on the unconditional 0% commission for granting the credit and 0% commission for early repayment.

In 3Q25, the Bank recorded cash loan sales of PLN1.86 billion. This gives 6% higher result compared to the level of the 2Q25. The Bank's market share in sales of cash loans in 3Q25 is estimated at 10%. The Bank's market share in cash loan balance at the end of 3Q25 was on the level of 8.7%.

90% of contracts in terms of quantity and 78% in terms of value were finished in digital channels, emphasizing the key importance of omnichannel in the lending process. Finalisation in digital channels complements the importance of the network of own and franchise branches and also telemarketing, thanks to which each customer can choose the most convenient path for themselves with or without the participation of advisors.

The Bank maintained the upward trend in the payment card portfolio with the result of 4.16 million cards at the end of September 2025 (+6% vs. 3Q24). The turnover in 3Q25 amounted to PLN23.2 billion on debit cards (+6% vs. 3Q24) and PLN2.1 billion on credit cards (+11% vs. 3Q24).

Business results were supported by new product solutions, including the implementation of VISA Millennium 360 Prestige. This new debit card for affluent clients, offers attractive FX payments, with preferable conversion rates and no additional fees.

3Q25 was a positive period on capital markets. The Polish mutual fund market saw positive net inflows supported by improved asset valuation. Capital markets sentiment and initiatives undertaken by the Bank had a positive impact on mutual fund sales and resulted in positive net sales of PLN852 million in 3Q25.

The Bank, especially in the retail customer segment, maintained the focus on developing and promoting regular investment, including, among others, the investment advisory service. This service provides customers with an easy and convenient way to access investment products, especially by investing even small amounts on a regular basis. All these efforts resulted in record 14.0 thousand of new regular fund registers opened in 1Q25 and reaching over 60 thousand regularly investing clients. The special strategy of rewarding the use of remote channels was also continued, with a reduction to 0% in handling

fees for the purchase of selected units through Millenet and the Mobile Application. Bank maintained the offer of structured deposits with guaranteed profit and capital protection.

In 3Q25 Bank Millennium opened 11 thousand business current accounts for Sole Traders. Compared to the third quarter of previous year this means 10.4% increase and compared to the previous quarter – increase of 11.2%.

85% of all business current accounts for Sole Traders during this period were opened in digital processes.

In 3Q25, Bank recorded the sales level of business loans for Sole Traders to the level of PLN291 million. Compared to the third quarter of last year this means a 23% increase and increase of 7.4% compared to the previous quarter.

The market share in sales of loans to the micro segment increased from 5.87% in 3Q24 to 6.48% in 3Q25.

## COPORATE BANKING PERFORMANCE

In Q3Q25, the value of new credit production increased by as much as 22% q/q and by as much as 83% y/y, mainly due to dynamic growth in the area of new investment loans, which accounted for as much as 42% of the value of new loans granted in 3Q25.

As a result, at the end of 3Q, the value of the loan portfolio in the corporate banking segment amounted to PLN14.9bn, which means an increase of 0.7 bn (i.e. 4,9%) q/q. This value consists of the following product groups:

- leasing PLN5.0bn
- current account overdrafts PLN3.4bn PLN
- factoring PLN2.6bn
- other loans PLN3.9bn.

At the end of the reporting period, the value of funds of corporate banking customers reached PLN 25.8 billion, was accounted for half-half by current accounts and term deposits (PLN 12.9 billion each).

In the area of small businesses, we recorded an increase in the loans volume by 7.5% to PLN876mn , and the deposits volume by 5% to PLN3.3bn.

## Credit products

### *Energy audits with 90% co-financing – a new offer for customers*

In effect of the signed cooperation agreement with the Employers of Poland, we have made available to customers from SME sector, small mid-cap and mid-cap sectors an offer of co-funding for energy audits.

The 90% subsidy applies to the costs incurred in connection with the preparation 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.



## Transaction and electronic banking

### *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 have been able to use the automatic renewal of direct debits function, which is unique on the market. This innovative solution significantly increases the effectiveness of direct debit payments, especially in the event of a temporary shortage of funds on the payer's account.

In the event of a rejection of the order due to lack of funds, customer can define the number of days for which the system will automatically retry the payment. This significantly increases the chance of effective collection of funds without 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 withdrawal requests even faster.

## Factoring

### *The new factoring supporting system*

We have designed a new factoring system with a new Millenet Faktor web application with user convenience in mind. The intuitive design allows for faster navigation, and the modern, clear interface ensures the convenience of using the system. The extended scope of data gives access to detailed information for each operation, which significantly facilitates the analysis and management of factoring processes. The graphical presentation of the information is user-friendly and allows for a quick overview of the current funding status and effective monitoring of available funds.

## Digitalisation of customer service processes

In 3Q25 of the current year 75% of agreements of credit type were signed by customers electronically, 77% of currency exchange transactions were made via the Millennium Forex Trader currency exchange platform, and 86% of guarantees were issued in the form of e-guarantees. Among the largest companies, 37.5% actively use a mobile app. The circulation rate of electronic documents exceeded 50%. Nearly 17 thousand documents have been processed in digital form of paper printouts.

The share of customers using Millennium Leasing's eBOK is also growing – at the end of September it was already 96% of leasing customers, while electronic applications regarding the management of contracts and leased items accounted in 3Q25 for 75% of all leasing applications submitted by customers.

Under the Deregulation Act, which came into force on 13 July 2025, Millennium Leasing was one of the first companies on the market to launch a new process for concluding a leasing agreement in documentary form. And we concluded the first leasing agreement on the market in this new form. Thanks to this change, customers can conclude leasing agreements remotely, without the need to have a qualified electronic signature.



More and more our customers conclude leasing agreements in electronic form. Currently, a significant part of contracts is signed with an e-Signature using a qualified electronic signature. During the 3 quarters of 2025, we concluded nearly 3900 agreements using e-Signature, and from 13 July 2025 - 126 agreements in documentary form.

### **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.

### **Millennium Leasing**

The total leasing production at the end of September 2025 was 12,425 contracts with a total net value PLN2,814.3mn. As at the end of September the value of capital committed in active leasing agreements was PLN7,15bn. The value of the portfolio at the end of September 2025 is higher by PLN274mn compared to the end of the corresponding period of 2024, which is an increase of 4%.

A significant portion of leasing production is carried out as part of the so-called vendor cooperation, i.e. with suppliers of leased assets. In 2025, we completed transactions for 2 870 customers, for a total net value of PLN860mn. Additionally, the base of vendors cooperating with us at the end of September 2025 was made up of almost 1,800 partners.

As part of our cooperation with brokers, at the end of September 2025, we completed transactions with 526 customers for a total net value of PLN79.7mn. Currently we cooperate with 15 brokers.

We are the market leader in the implementation of leasing agreements with BGK de minimis guarantees. During the 3 quarters of 2025, we signed 930 leasing agreements with this guarantee, for a total net value of PLN207.26mn. In March 2025, on the basis of an annex to the agreement signed with Bank Gospodarstwa Krajowego, we were able to cover leasing agreements with BGK's de minimis guarantee for a record total amount of PLN1.1bn.

### **Customer Events**

In the 3Q25, we were a co-organiser and substantive partner of the following initiatives:

- in September, a series of meetings began as part of the 8th edition of the Forbes Family Business Forum. This year, 9 local galas are planned in Poznań, Sopot, Lublin, Wrocław, Katowice, Krakow, Toruń, Łódź, Warsaw, during which the most valuable family businesses in Poland are distinguished;
- business breakfast as part of the CFO Club, organized together with the ICAN Institute with the participation of our experts. The main topic of the meeting was "Competences of the future and career paths of tomorrow".
- ESG Academy webinar with the participation of experts from the Department of Sustainable Development under the slogan: "ESG in the banking sector - how does it affect access to capital and investment?".
- business breakfast in cooperation with the Pomeranian Employers under the slogan: "Poland-China. Meeting of Markets, Culture and Business.", during which our experts discussed key issues related to doing business in China,

- we have started a series of podcasts "Digital offer for companies". Our broadcast is available on the most popular platforms: Apple Podcast, Spotify and YouTube.

## DIGITAL BANKING

In 3Q25, Bank Millennium exceeded 3 million customers active in digital channels. We ended the quarter with 3.02 million (+6% yr/y) active users of digital channels, of which 2.82 million (+9% y/y) are users of the mobile app, and 2.12 million (+8% y/y) are mobile only users. Mobile only users currently constitute 70% of all active digital users.

### Payments and Additional Services

In 3Q25, as many as 2.18 million customers used BLIK at least once (an increase of 10% y/y), accounting for 78% of all mobile users. In September, we surpassed 2 million customers active in e-commerce on a monthly basis. Already, 80% of digital users shop online. Customers are keen to use P2P transfers. In the third quarter, they initiated 18.6 million such transfers. 63% of mobile users are already using this feature.

In July, a new benefit period for the Dobry Start 300+ program began. Our customers have submitted 260 thousand applications to date. We have already exceeded the number of applications submitted last year (244 thousand). Applications can be submitted until the end of October.

### Digital share in sales and acquisition

The share of digital channels in sales remains stable. The share of digital channels in cash loan sales in 3Q25 accounted for 88%. The share of digital channels in the sale of term deposits remains unchanged at 95% in the third quarter of 2025. A clear increase in the role of digital channels in the acquisition of current accounts is evident, reaching 56% in 3Q25. For children's accounts, digital channels are already responsible for 77% of new accounts. In 3Q25, 84% of credit cards were ordered by customers via digital channels.

In July, we launched a new Savings Account with a goal (Konto Oszczędnościowe Twój Cel). Customers have already set up 13 thousand goals, with 73% opting to contribute to their goal on regular basis.

### Goodie application

3Q25 was a period of further development of the functionality of the goodie platform and intensification of promotional activities, which translated into an increase in user acquisition and activity.

During this period, the development of the price comparison website continued, which records an increasing interest of users. The tool allows users to search for products and compare prices and cashback amounts in shops participating in the cashback programme.

In addition, in 3Q25, goodie continued to see an increase in the number of cashback transactions carried out through the platform. Comparing the statistics on an annual basis, the value of transactions increased by almost 30% y/y.

In addition, in September, goodie won the title of Sales Champion for the highest sales of all ad publishers in one of the affiliate networks.

## ESG ACTIVITIES: ENVIRONMENTAL, SOCIAL, GOVERNANCE

**Bank Millennium conducts business in a responsible and ethical manner, with the environment and local communities in mind.** Sustainability plays an important role in our strategy and is one of the key success factors, with business and ESG goals forming a cohesive whole.

The Bank supports UN Sustainable Development Goals and is a signatory of the 10 UNGC principles and Diversity Charter.

### The most important ESG activities carried out in the 3<sup>rd</sup> quarter of 2025

#### Financing sustainable investments

Bank Millennium develops modern processes to prioritise investments supporting the green transition. In July, it introduced a convenient and effective digital process for collecting ESG data, which will be used to assess whether a client's transaction or business activity is sustainable, as well as to analyse the client's exposure to ESG risks.

In line with its development strategy in the area of corporate banking, Bank Millennium focuses on active financing of investments related to the green transformation of the economy. The Bank improved the existing process of collecting ESG data for selected transactions. In July the Bank introduced a process of collecting this data through electronic banking, which supports the assessment of the greenness of transactions and business customers' activities, based on specifically designed decision-making mechanisms.

This process also collects information on the exposure of customers' operations and investments to ESG risks, in particular on exposure to climate risks – related both to extreme weather events and to challenges of transition to a low-carbon economy. The obligation to collect this information results from the guidelines of the European Banking Authority on ESG risk management, which will apply to all banks from January 2026.

#### Loan for Company Development

Now, companies can finance their investment expenditures and their current needs easier. In August Bank Millennium expanded its offer for companies with the Loan for development, without the need to specify the purpose of the funds. In addition, companies whose activities will be classified by the Bank as 'green' will not pay an origination fee on the loan granted.

A development loan is flexible financing that does not require an indication of a purpose, so it can be used both as working capital and investment support: equity contribution or bridge financing for investments supported by grants, as well as financing projects that do not qualify for public support. The Bank offers preferential terms for companies whose activities are classified as "green" (the company generates most of its revenues from the sale of products or the provision of services related to sustainable development or environmental protection). This is a concrete support for companies that want to combine business development with environmental responsibility.

#### Establishing cooperation with Employers of Poland

Bank Millennium has established cooperation with Employers of Poland as part of the Energy of Employers of Poland project. It is implemented using the ELENA program, which allows entrepreneurs to obtain funding for up to 90% of the costs of preparing technical documentation for investments increasing energy efficiency.

The subsidy offered by the Employers of Poland can be used by micro, small and medium-sized companies as well as small and mid-cap companies employing up to 3000 employees. Financing does not constitute state aid or de minimis aid, and the preparation of documentation should be commissioned to contractors from the list recommended by the Employers of Poland.

Thanks to the Bank's cooperation with the Employers of Poland, clients gain access to proven documentation contractors and a simplified path of applying for public funds to finance technical documentation as part of ongoing or planned investments.

### **Bank Millennium promotes regular savings and provides a new savings account**

Bank Millennium has introduced the Your Goal Savings Account, which allows you to conveniently and automatically set money aside for a specific goal. Customers who save regularly will receive a higher interest rate.

When opening an account, the customer determines the goal of saving and decides how they intend to achieve it. He has a choice of different approaches, which he can flexibly adapt to a specific goal. Goals can also be used to better manage the budget. It allows customers to create virtual "envelopes" for various expenses, e.g. bills or purchases, making it easier to plan expenses in advance.

Savings goals can be set in the Millenet mobile application and online banking. Progress in saving is presented in a transparent way, and additional support is provided by proactive, engaging communication that helps build the habit of saving.

### **Millennium TFI wins the award for the best sustainable investment fund**

The Millennium SFIO Active Plan Fund has been recognised as the best sustainable fund promoting sustainability. The award was presented in September at the POLSIF Awards gala.

The Millennium SFIO Active Plan Fund consistently integrates ESG factors in its investment strategy – environmental, social and governance. It is a specialised investment fund whose goal is to invest at least 80% of its assets in foreign equity investment funds.

POLSIF AWARDS is the first industry award in Poland entirely dedicated to sustainable finance. The competition is organized by the POLSIF Association – Sustainable Investment Forum Poland. The aim is to distinguish institutions, funds and enterprises that implement solutions supporting the climate and energy transition and the development of a socially responsible economy in practice.

### **The 8th Edition of Forbes Family Business Forum has started**

The 8th edition of the Family Business Forum has started – a joint initiative of Forbes magazine and Bank Millennium. It is a cyclical event bringing together family businesses - a forum for debates and meetings, providing opportunities to build business relationships, gain new partners and distinguish the best family businesses across different regions of Poland.

The project was inaugurated by an editorial debate with the participation of representatives of companies and the Bank. This year's edition, under the slogan "Competitiveness in the world of fracturing alliances", was attended by Magdalena Zmitrowicz, Member of the Bank's Management Board. The Bank was represented in the discussion panel by Paweł Pęczak, Director in the Corporate Banking Department. Additionally, a presentation titled "Not only to survive, but to spread your wings. Flexible organisation" was delivered by Laura Kloch, an expert at the EU Funds Competence Centre.

Bank Millennium has been the strategic partner of the Family Business Forum since 2018.

### **Bank Millennium is a partner of the Golden Yorick 2025 competition**

Bank Millennium, which has been involved in the promotion of culture in Poland for nearly four decades, became a partner of the 2025 Golden Yorick award – the oldest and most prestigious award for Polish stagings of William Shakespeare's plays.

The Golden Yorick competition has been held continuously since 1994 and is a summary of Polish Shakespearean productions of a given artistic season. This year's 29th edition of the Gdańsk Shakespeare Festival was held from 25 July to 3 August 2025 under the slogan "Words, words, words". The festival is an international platform for the exchange of experiences and artistic dialogue, bringing together artistic communities and theatre lovers from all over the world. As the only festival from Poland and one of only five in Europe, it was honoured with the prestigious EFFE Award, given by the European Festivals Association in cooperation with the European Commission and the European Parliament.

This year's winner was the play "A Winter's Tale" directed by Pamela Leończyk, prepared by the Zygmunt Hübner Teatr Powszechny theatre in Warsaw. The award in the Golden Yorick 2025 competition was presented on behalf of the Bank by Iwona Jarzębska, Chairwoman of the Bank Millennium Foundation.

### **"Złota Tarka" Festival**

Bank Millennium has been a sponsor of the "Złota Tarka" festival for over two decades – one of the oldest and most respected jazz festivals in Europe. Złota Tarka is a unique event, bringing together generations, styles and emotions. For three days, Ława resounds with the sounds of jazz in its purest, traditional form, attracting both outstanding artists and young musicians who compete for the prestigious Złota Tarka award.

### **ESG Academy webinar with the participation of Bank Millennium experts**

Representatives of the Sustainability Department, Magdalena Trzynadłowska and Katarzyna Wójcik, shared their knowledge and experience in the ESG area by leading the ESG Academy webinar titled "ESG in Customer Relations – the bank's perspective" organised by GS1. The event was aimed at presenting the impact of ESG factors on financial institutions' practices and customer relationships.

### **ESG training for SMEs**

Katarzyna Wójcik from the Sustainability Department gave a lecture entitled "ESG from the perspective of the bank and your company" during the ESG training for representatives of small and medium-sized enterprises. The aim of the lecture was to help companies understand what financial institutions expect from them. The event was organised by GS1.

### **Expert commentary of the EU Funds Competence Centre**

Joanna Tytz from the EU Funds Competence Centre of Bank Millennium prepared an expert commentary summarising public funding opportunities available to entrepreneurs. It was published by, among others: Forbes, Next Gazeta.pl, Money.pl, Gomobi.pl and CEO Magazyn.

## **MACROECONOMIC SITUATION**

3Q25 marks the period when the most significant changes in tariff policy in decades - initiated by the President of the United States - began to take shape. In August 2025, new import tax rates came into effect, covering as many as 70 countries, including the European Union and China. The U.S. administration also introduced sector-specific tariffs, for example on steel, copper, aluminium, and automobiles. The final agreements are more moderate than the initial announcements, yet they remain at the highest levels in years. The changes are significant – not only because of the scale, but also due to the need to adapt supply chains, e.g., by looking for cheaper suppliers and new markets.

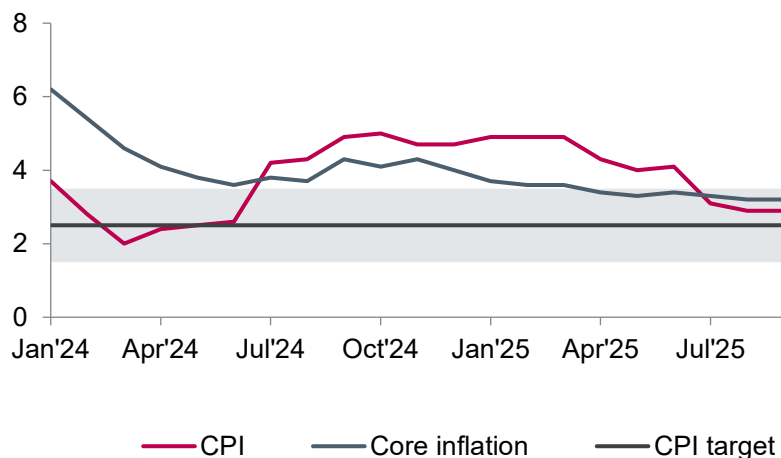
At the beginning of 4Q25, trade tensions between the United States and China escalated once again, underscoring that trade policy remains a significant source of risk for the global economy and financial markets. At the same time, other risk factors - particularly fiscal policy and international security concerns - are gaining increasing importance. In July 2025, a law was passed in the US that increases spending and lowers federal budget revenues, which translates into forecasts of further significant increases in public debt in the coming years. Fiscal problems also concern Europe. In September and October 2025, an attempt to implement austerity led to the collapse of the government in France, and due to the deterioration of the fiscal outlook, Fitch downgraded the country's rating. A similar decision was made for the US earlier in May 2025. Although currently countries with high deficits have no problems servicing their debt, negative budget results translate into rising interest costs and a higher risk premium, limiting the scope for fiscal stimulus and crowding out private investment. In an extremely pessimistic, although unlikely scenario, there could be a loss of creditworthiness and, as a result, an outflow of capital, making it difficult to meet borrowing needs.

Despite those negative trends, the global economy shows considerable resilience to protectionism in international trade and the uncertainty it generates. Business cycle indicators point to an acceleration in global GDP growth in 3Q25, although the pace of expansion in the largest economies - the United States, China, and the euro area - has likely weakened somewhat. At the same time, according to the International Monetary Fund's forecasts, global economic growth is expected to slow only slightly – from 3.3% last year to 3.2% in 2025 and to 3.1% in 2026. Nevertheless, the outlook for the euro area - Poland's main trading partner - remains subdued. As a result, in the coming quarters, foreign demand is unlikely to be a driver of Poland's GDP growth.

Poland, which has relatively fewer links with the economies most affected by protectionism, also proved resilient to changes in international trade conditions. According to the Bank's estimates, GDP growth in 3Q25 amounted to 3.5% y/y vs. 3.3% y/y a quarter earlier. The main driver of growth was private consumption, supported by rising household incomes and improved consumer sentiment. Growth, on the other hand, was limited by the weakness of investments, which can be attributed to the initial phase of implementation of projects co-financed by European funds. In addition, net exports – according to the Bank's estimates – did not provide support, experiencing the negative impact of weak demand from the euro area.

Household consumption was supported by the continuation of the downward trend in inflation. In 3Q25, CPI inflation stood at 3.0% y/y vs. 4.1% y/y a quarter earlier, returning to the range of permissible deviations from the inflation target. Core inflation also decreased - to 3.2% y/y from 3.4% y/y in 2Q25, driven by slower wage growth amid weaker labour demand, a strong złoty, and disinflation in Poland's external environment. Given the improved inflation outlook, the Monetary Policy Council lowered the National Bank of Poland's key interest rate by a total of 75 basis points at its July, September and October meetings, bringing it down to 4.50%. Nevertheless, the prospect of solid private consumption and low unemployment, combined with expansionary fiscal policy, prompts the Council to be cautious in further lowering interest rates.

**CPI and core inflation (% y/y)**

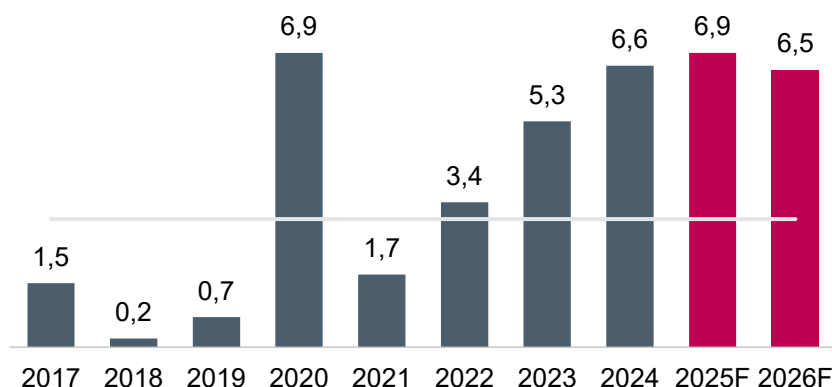


Source: Macrobond, NBP

In August 2025, the Polish government presented a draft budget law for 2026, which assumes that the deficit of the general government sector will amount to 6.9% of GDP in 2025 – significantly higher than planned a year ago – and 6.5% of GDP in 2026. This will therefore be the third year in a row with a deficit of more than 6% of GDP. Fiscal policy remains accommodative, and the political calendar - including parliamentary elections scheduled for 2027 - is unlikely to encourage steps toward consolidation. In view of such conditions, Fitch and Moody's have lowered the outlook for the Polish debt rating from neutral to negative. A downgrade of the rating itself seems unlikely in the near future.



**General Govt. sector deficit and assumptions from the draft budget bill (% of GDP)**

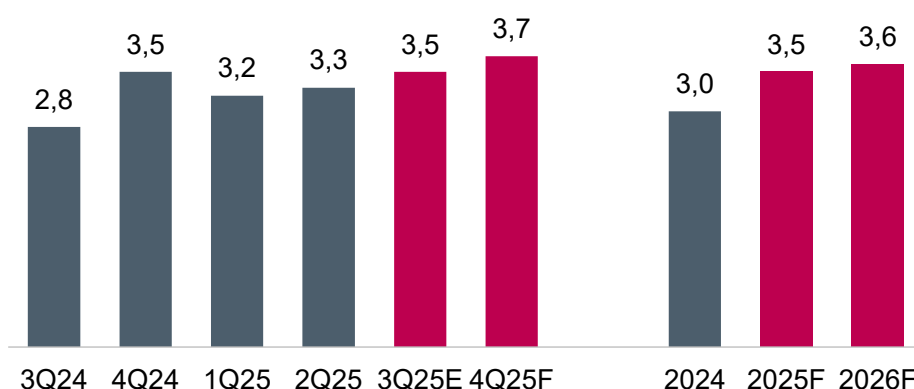


Source: Macrobond, Min, Fin, Bank Millennium, E - estimate, F - forecast

Positive real interest rates supported further dynamic growth in deposits in the banking sector in 3Q25. The value of deposits in August 2025 was 31.3 bn PLN higher than at the end of June 2025, which represents an increase of 10.5% y/y. With the National Bank of Poland lowering interest rates, July-August 2025 saw an increase in the value of new loans granted to households. Credit creation for non-financial corporations, on the other hand, was stable. The total value of newly granted loans in July and August 2025 was 20.1% higher than in the same period in 2024.

The Bank expects that in 4Q25, GDP growth will be higher than in 3Q and will amount to 3.7% y/y, with a higher contribution of corporate investments. For the whole of 2025, the Bank estimates Poland's economic growth at 3.5%, which means an acceleration from 3.0% in 2024. In 2026, GDP growth is expected to remain stable, although its breakdown will change. Investments are likely to have a greater contribution to the growth, especially those implemented under the European Union's cohesion policy and the National Recovery Plan. The Bank expects consumption to remain an important support for the economy. However, its growth is likely to moderate due to the slowdown in wage growth, which will be due to a lower minimum wage increase in 2026 than in recent years. At the same time, the slow recovery of the eurozone economy - as in 2025 - is likely to continue to limit the growth potential of the Polish economy.

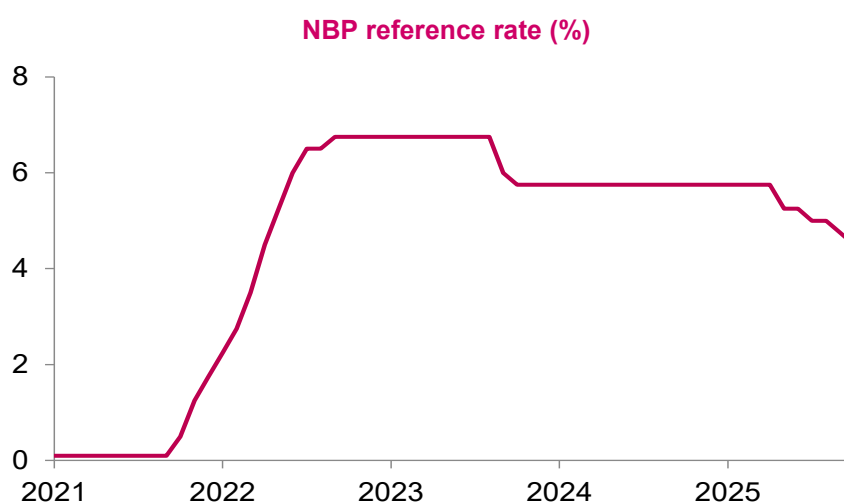
**GDP and its forecasts (% y/y)**



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



Following the government's decision to extend the freeze on electricity prices into 4Q25, inflation in Poland is expected to remain stable between October and December 2025, close to 3.0% year-on-year. According to the Bank's forecasts, average annual CPI inflation in 2025 will be 3.8% y/y and 3.1% y/y in 2026. Growth in food and energy prices is expected to slow down further, along with a continued downward trend in core inflation. However, the pace of its decline may be moderate, due to the expected low unemployment and sticky inflation in service prices, partly resulting from demographic factors. In 2026, however, there should be room for NBP interest rate cuts. The Bank assumes that in 2026 the NBP reference rate will fall to 3.50% from the current level of 4.50%. The main constraint on monetary policy easing in Poland remains the government's plans for expansionary fiscal policy. The coming quarters are likely to be a period of heightened uncertainty, mainly due to geopolitical factors. CPI inflation forecasts at the beginning of 2026 are also fraught with temporary risks related to the level of electricity fees and the scale of excise duty increases on alcohol.



Source: NBP

### Factors of uncertainty for the economy and the Bank Millennium Group

In 3Q25, the previously identified risk factors related to protectionism in international trade, the lack of fiscal consolidation in many economies, including Poland, the intensification of risks related to the Russia-Ukraine war, and the difficult relationship between the President and the Government in Poland materialised. However, this did not significantly affect the macroeconomic scenario for Poland. In the Bank's opinion, the above risk factors should remain valid also in the coming quarters.

- **Global political and military situation**

These include social unrest, the possibility of escalating military action between Russia and Ukraine, and prolonged tensions in 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 major economies as well as correction on global financial markets**

A risk factor for the global economic situation relates to debt problems of the public and private sectors in some major economies, as well as an adjustment of asset prices on global financial markets. This would affect 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, raising yields on domestic bonds and influencing the valuation of the Bank Millennium Group.

- **Increase in political, institutional and fiscal risks in Poland**

It would result from the lack of cooperation between the President and the Government and from possible early parliamentary elections. This could lead to disruptions in the implementation of economic policy, including delays in the implementation of programmes co-financed by EU funds. This factor as well as political instability could lead to a deterioration in the fiscal situation, a downgrade in credit ratings, an increase in risk premium, a weakening of the zloty, a decline in the value of government bonds and an increase in volatility on financial markets. A clear example of the fiscal risks triggered by high budget deficits is the announced planned increase in the corporate income tax for banks from 2026 on.

- **Further escalation of protectionist trade measures globally**

Such a scenario would result in continued heightened uncertainty, hampering economic planning, production disruptions, supply chain bottlenecks and a decline in economic efficiency. As a consequence, economic growth could weaken – primarily abroad, but also to a lesser extent in Poland. Prolonged protectionism and a slowdown in global growth could also result in lower inflation and deeper-than-expected interest rate cuts, which would adversely affect the Bank's financial results.

There is also a possibility that the economic situation in Poland will develop more favourably than assumed in the Bank's baseline scenario. This could materialise in the event of faster absorption of EU funds, the end of hostilities in Ukraine, an improvement in economic sentiment and a decline in the propensity of households to save, and an increase in investment demand from companies. A stronger-than-expected recovery abroad and a faster implementation of the investment programme in Germany would also support better economic performance.

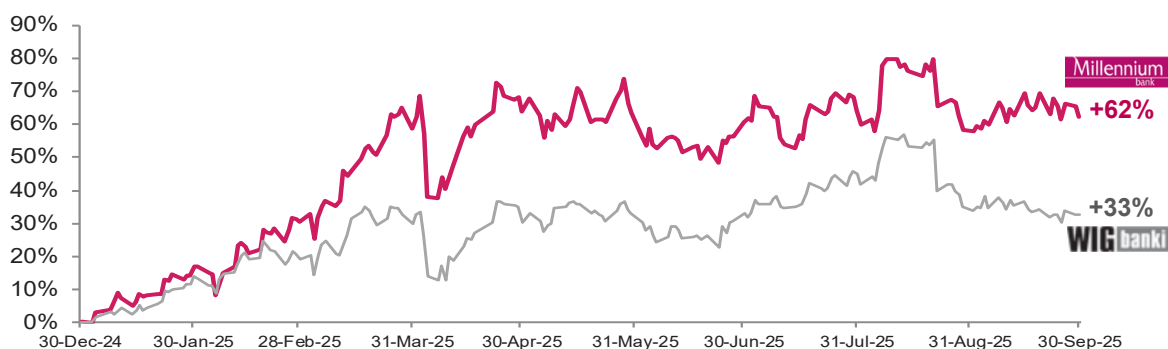
## INFORMATION ON SHARES AND RATINGS

In 9M25, global stock markets maintained upward trajectory, which was also reflected on the Warsaw Stock Exchange (WSE). Despite negative sentiment associated with the late August announcement of corporate tax increase for the Polish banking sector during 2026-2028 period, the remaining part of 3Q25 brought positive returns for investors on WSE.

Overall, in 9M25 the broad market index WIG advanced by 34%, WIG Banks increased by 33%, while Bank Millennium's shares gained 62%, ranking among top two performers in the banking sector.

During the 12 months ending 30 September 2025, the broad market index WIG grew by 28%, WIG20 index of the largest companies advanced by 22%, while WIG Banks outperformed the market significantly by gaining 31%. In the same period, the share price of Bank Millennium surged 70%, making it the undisputed top performer in the sector.

### Bank Millennium: ytd share price performance vs. WIG Banks



In 9M25 the average daily turnover of Bank Millennium shares was 123% higher than in the same period last year.

<b>Market ratios</b>	<b>30.09.2025</b>	<b>30.12.2024*</b>	<b>Change ytd</b>	<b>30.09.2024</b>	<b>Change y/y</b>
Number of the Bank's shares (th)	1,213,117	1,213,117	0.00%	1,213,117	0.00%
Average daily turnover in annual terms (PLN'000)	18,777	7,708	143.6%	8,407	123.4%
Bank share price (PLN)	14.44	8.9	62.3%	8.52	69.5%
Market capitalisation of the Bank (PLNmnn)	17,517	10,797	62.3%	10,336	69.5%
WIG Banks	16,369	12,346	32.6%	12,458	31.4%
WIG20	2,827	2,192	29.0%	2,324	21.6%
WIG30	3,665	2,806	30.6%	2,940	24.7%
WIG - main index	106,364	79,577	33.7%	83,274	27.7%

(\*) the last day of quotation in 2024.

Bank Millennium shares are constituents of the following WSE indices: WIG, WIG30, WIG Banks, mWIG 40, WIG Poland. Additionally, shares of Bank Millennium were reintroduced into MSCI Poland.

Bank Millennium tickers: ISIN PLBIG0000016, Bloomberg MIL PW, Reuters MILP.WA.

### Ratings of Bank Millennium

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+'.

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

<b>Rating</b>	<b>MOODY'S</b>
Long-term deposit	Baa2
Short-term deposit	Prime-2
Baseline Credit Assessment (BCA)/Adj. BCA	Ba2/ba1
LT Counterparty Risk Assessment (CRA)/ST CRA	Baa1(cr)/Prime-2(cr)
Rating outlook	Positive
SNP MREL bonds	Ba1

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-

## CONSOLIDATED REPORT OF THE BANK MILLENNIUM S.A. CAPITAL GROUP FOR 3<sup>RD</sup> QUARTER OF 2025

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**CONDENSED INTERIM CONSOLIDATED FINANCIAL  
STATEMENTS OF THE BANK MILLENNIUM S.A.  
CAPITAL GROUP FOR THE 9 MONTHS ENDED  
30 SEPTEMBER 2025**

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# 1. CONSOLIDATED FINANCIAL DATA (GROUP)

## CONSOLIDATED STATEMENT OF PROFIT AND LOSS

<b>Amount '000 PLN</b>	<b>Note</b>	<b>1.01.2025 - 30.09.2025</b>	<b>1.07.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>	<b>1.07.2024 - 30.09.2024 restated data</b>
Net interest income		4 317 515	1 445 717	4 024 899	1 489 082
Interest income and other of similar nature	1	6 847 929	2 279 576	6 487 795	2 313 169
Income calculated using the effective interest method		6 758 966	2 249 858	6 372 596	2 280 129
Interest income from Financial assets at amortised cost, of which:		5 472 635	1 786 079	5 377 150	1 922 516
- the impact of the adjustment to the gross carrying amount of loans due to credit holidays		0	0	(157 306)	43 740
Interest income from Financial assets at fair value through other comprehensive income		1 286 331	463 779	995 446	357 613
Result of similar nature to interest from Financial assets at fair value through profit or loss		88 963	29 718	115 199	33 040
Interest expenses	2	(2 530 414)	(833 859)	(2 462 896)	(824 087)
Net fee and commission income		574 978	204 344	588 755	198 634
Fee and commission income	3	795 160	277 655	799 242	274 671
Fee and commission expenses	4	(220 182)	(73 311)	(210 487)	(76 037)
Dividend income		4 266	719	3 539	150
Result on derecognition of financial assets and liabilities not measured at fair value through profit or loss	5	(3 259)	(870)	(1 133)	(400)
Results on financial assets and liabilities held for trading	6	17 930	4 659	(4 767)	(2 578)
Result on non-trading financial assets mandatorily at fair value through profit or loss	7	54 923	242	9 871	4 073
Result on hedge accounting		2 849	3 299	201	1 657
Result on exchange differences		166 646	56 986	169 369	55 960
Other operating income		315 418	124 977	275 958	106 280
Other operating expenses		(285 328)	(90 404)	(272 416)	(69 796)
Administrative expenses	8	(1 730 091)	(571 718)	(1 489 393)	(495 641)
Impairment losses on financial assets	9	(179 139)	(102 711)	(303 853)	(113 377)
Impairment losses on non-financial assets		(12 103)	(10 353)	(4 353)	(2 257)
Legal risk expenses connected with FX mortgage loans, of which:	10	(1 569 996)	(484 609)	(2 130 523)	(697 688)
Provisions for legal risk		(1 503 209)	(484 609)	(1 656 390)	(532 800)
Result on modification		(2 741)	(509)	(1 893)	(444)
Depreciation		(166 911)	(55 357)	(167 001)	(57 492)
Share of the profit of investments in subsidiaries		0	0	0	0
Banking tax		(300 612)	(100 794)	(133 512)	(98 990)
Profit before income taxes		<b>1 204 345</b>	<b>423 618</b>	<b>563 748</b>	<b>317 173</b>
Corporate income tax	11	(349 093)	(79 112)	(17 052)	(127 410)
Profit after taxes		<b>855 252</b>	<b>344 506</b>	<b>546 696</b>	<b>189 763</b>
Attributable to:					
Owners of the parent		855 252	344 506	546 696	189 763
Non-controlling interests		0	0	0	0
Weighted average number of outstanding ordinary shares (pcs.)		1 213 116 777	1 213 116 777	1 213 116 777	1 213 116 777
Profit (ordinary/diluted) per ordinary share (in PLN)		0.71	0.28	0.45	0.16

**CONSOLIDATED STATEMENT OF TOTAL COMPREHENSIVE INCOME**

<b>Amount '000 PLN</b>	<b>1.01.2025 - 30.09.2025</b>	<b>1.07.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024</b>	<b>1.07.2024 - 30.09.2024</b>
Profit after taxes	855 252	344 506	546 696	189 763
Other comprehensive income items that may be (or were) reclassified to profit or loss	223 515	71 540	251 293	137 058
Result on debt securities	206 731	67 920	225 569	128 289
Hedge accounting	16 784	3 620	25 724	8 769
Other comprehensive income items that will not be reclassified to profit or loss	0	0	0	0
Actuarial gains (losses)	0	0	0	0
Result on equity instruments	0	0	0	0
<b>Total comprehensive income items before taxes</b>	<b>223 515</b>	<b>71 540</b>	<b>251 293</b>	<b>137 058</b>
Corporate income tax on other comprehensive income items that may be (or were) reclassified to profit or loss	(42 468)	(13 593)	(47 746)	(26 041)
Corporate income tax on other comprehensive income items that will not be reclassified to profit or loss	0	0	0	0
<b>Total comprehensive income items after taxes</b>	<b>181 047</b>	<b>57 947</b>	<b>203 547</b>	<b>111 017</b>
<b>Total comprehensive income for the period</b>	<b>1 036 299</b>	<b>402 453</b>	<b>750 243</b>	<b>300 780</b>
Attributable to:				
Owners of the parent	1 036 299	402 453	750 243	300 780
Non-controlling interests	0	0	0	0

## CONSOLIDATED STATEMENT OF FINANCIAL POSITION

### ASSETS

<b>Amount '000 PLN</b>	<b>Note</b>	<b>30.09.2025</b>	<b>31.12.2024 restated data</b>	<b>01.01.2024 restated data</b>
Cash, cash balances at central banks		4 940 600	5 178 984	5 094 984
Financial assets held for trading	12	1 414 673	1 005 542	620 486
Derivatives		189 956	255 845	498 249
Equity instruments		177	115	121
Debt securities, of which:		745 015	555 364	110 554
Securities underlying the sale and repurchase agreements		132 978	194 088	0
Reverse sale and repurchase agreements		479 525	194 218	11 562
Non-trading financial assets mandatorily at fair value through profit or loss, other than Loans and advances to customers		172 806	118 399	147 623
Equity instruments		151 581	66 609	66 609
Debt securities		21 225	51 790	81 014
Financial assets at fair value through other comprehensive income	13	39 867 825	29 255 449	22 096 199
Equity instruments		36 857	36 712	28 793
Debt securities		39 830 968	29 218 737	22 067 407
Loans and advances to customers	14	74 729 231	74 975 315	73 615 096
Mandatorily at fair value through profit or loss		816	1 825	19 349
Valued at amortised cost		74 728 415	74 973 490	73 595 747
Financial assets at amortised cost other than Loans and advances to customers	15	27 778 978	24 816 002	20 695 024
Debt securities		27 176 294	24 381 485	18 749 907
Deposits, loans and advances to banks and other monetary institutions		499 102	434 517	793 436
Reverse sale and repurchase agreements		103 582	0	1 151 680
Derivatives – Hedge accounting	16	0	0	15 069
Investments in subsidiaries, joint ventures and associates		44 012	44 012	52 509
Tangible fixed assets		538 679	532 226	529 876
Intangible fixed assets		593 044	534 417	465 425
Income tax assets		547 654	713 777	486 803
Current income tax assets		3 466	343	1 810
Deferred income tax assets		544 188	713 434	484 993
Other assets		2 046 053	1 765 188	1 544 328
Non-current assets and disposal groups classified as held for sale		12 601	14 549	17 514
<b>Total assets</b>		<b>152 686 156</b>	<b>138 953 860</b>	<b>125 380 936</b>

**LIABILITIES AND EQUITY**

<b>Amount '000 PLN</b>	<b>Note</b>	<b>30.09.2025</b>	<b>31.12.2024 restated data</b>	<b>01.01.2024 restated data</b>
<b>LIABILITIES</b>				
Financial liabilities held for trading	12	760 962	417 073	579 553
Derivatives		262 548	226 304	576 833
Liabilities from short sale of securities		498 414	190 769	2 720
Financial liabilities measured at amortised cost		136 831 849	125 343 000	112 633 689
Liabilities to banks and other monetary institutions	17	193 004	204 459	504 368
Liabilities to customers	18	128 185 546	117 257 213	107 246 428
Sale and repurchase agreements	19	133 057	194 223	0
Debt securities issued	20	6 764 146	6 124 775	3 317 849
Subordinated debt	21	1 556 096	1 562 330	1 565 045
Derivatives – Hedge accounting	16	26 728	101 539	165 700
Provisions	22	3 600 320	2 951 752	1 493 799
Legal issues		3 452 797	2 847 003	1 403 105
Commitments and guarantees given		93 131	53 583	42 367
Retirement benefits		54 392	51 166	48 328
Income tax liabilities		11 856	223 767	461 456
Current income tax liabilities		9 247	220 659	461 217
Deferred income tax liabilities		2 609	3 108	240
Other liabilities		2 646 508	2 145 095	3 151 843
<b>Total Liabilities</b>		<b>143 878 223</b>	<b>131 182 226</b>	<b>118 486 041</b>
<b>EQUITY</b>				
Share capital		1 213 117	1 213 117	1 213 117
Own shares		(21)	(21)	(21)
Share premium		1 147 502	1 147 502	1 147 502
Accumulated other comprehensive income		121 063	(59 984)	(217 512)
Retained earnings		6 326 272	5 471 020	4 751 809
Total equity		8 807 933	7 771 634	6 894 895
Total equity and total liabilities		<b>152 686 156</b>	<b>138 953 860</b>	<b>125 380 936</b>

**CONSOLIDATED STATEMENT OF CHANGES IN EQUITY**

<i>Amount '000 PLN</i>	<b>Total consolidated equity</b>	<b>Share capital</b>	<b>Own shares</b>	<b>Share premium</b>	<b>Accumulated other comprehensive income</b>	<b>Retained earnings</b>	
						<b>Unappropriated result</b>	<b>Other reserves</b>
<b>01.01.2025 – 30.09.2025</b>							
Equity at the beginning of the period	7 771 634	1 213 117	(21)	1 147 502	(59 984)	953 897	4 517 123
Total comprehensive income for period (net)	1 036 299	0	0	0	181 047	855 252	0
net profit/ (loss) of the period	855 252	0	0	0	0	855 252	0
other comprehensive income items after taxes	181 047	0	0	0	181 047	0	0
Transfer between items of reserves	0	0	0	0	0	(660 989)	660 989
Equity at the end of the period	8 807 933	1 213 117	(21)	1 147 502	121 063	1 148 160	5 178 112

<i>Amount '000 PLN</i>	<b>Total consolidated equity</b>	<b>Share capital</b>	<b>Own shares</b>	<b>Share premium</b>	<b>Accumulated other comprehensive income</b>	<b>Retained earnings</b>	
						<b>Unappropriated result</b>	<b>Other reserves</b>
<b>01.01.2024 – 31.12.2024</b>							
Equity at the beginning of the period	6 894 897	1 213 117	(21)	1 147 502	(217 512)	792 278	3 959 533
Total comprehensive income for period (net)	876 737	0	0	0	157 528	719 209	0
net profit/ (loss) of the period	719 209	0	0	0	0	719 209	0
other comprehensive income items after taxes	157 528	0	0	0	157 528	0	0
Transfer between items of reserves	0	0	0	0	0	(557 590)	557 590
Equity at the end of the period	7 771 634	1 213 117	(21)	1 147 502	(59 984)	953 897	4 517 123

<i>Amount '000 PLN</i>	<b>Total consolidated equity</b>	<b>Share capital</b>	<b>Own shares</b>	<b>Share premium</b>	<b>Accumulated other comprehensive income</b>	<b>Retained earnings</b>	
						<b>Unappropriated result</b>	<b>Other reserves</b>
<b>01.01.2024 – 30.09.2024</b>							
Equity at the beginning of the period	6 894 895	1 213 117	(21)	1 147 502	(217 512)	792 276	3 959 533
Total comprehensive income for period (net)	750 243	0	0	0	203 547	546 696	0
net profit/ (loss) of the period	546 696	0	0	0	0	546 696	0
other comprehensive income items after taxes	203 547	0	0	0	203 547	0	0
Transfer between items of reserves	0	0	0	0	0	(553 622)	553 622
Equity at the end of the period	7 645 138	1 213 117	(21)	1 147 502	(13 965)	785 350	4 513 155

## CONSOLIDATED STATEMENT OF CASH FLOW

### A. CASH FLOWS FROM OPERATING ACTIVITIES

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>
Profit (loss) after taxes	855 252	546 696
Total adjustments:	11 997 620	6 239 846
Interest income/expense result (from the Profit and loss statement)	(4 317 515)	(4 024 898)
Interest received	6 687 127	6 308 238
Interest paid	(2 067 833)	(2 114 858)
Depreciation and amortization	166 911	167 001
Foreign exchange (gains)/ losses	(3 623)	(25 565)
Dividends	(4 266)	(3 539)
Changes in provisions	648 568	1 326 045
Result on sale and liquidation of investing activity assets	(37 612)	(2 320)
Change in financial assets held for trading	(151 771)	(115 018)
Change in loans and advances to banks	(105 699)	60 945
Change in loans and advances to customers	266 460	(1 839 396)
Change in receivables from securities bought with sell-back clause (loans and advances)	(388 889)	946 891
Change in financial liabilities valued at fair value through profit and loss (held for trading)	269 078	11 617
Change in deposits from banks	(12 287)	(279 818)
Change in deposits from customers	11 044 471	6 859 538
Change in liabilities from securities sold with buy-back clause	(61 166)	216 361
Change in debt securities issued	(18 006)	7 603
Income tax (from the Profit and loss statement)	349 093	17 051
Income tax paid	(438 742)	(588 180)
Change in other assets and liabilities	173 319	(687 852)
Net cash flows from operating activities	12 852 872	6 786 542

## B. CASH FLOWS FROM INVESTING ACTIVITIES

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>
Inflows:	424 066 230	443 098 175
Proceeds from sale of property, plant and equipment and intangible assets	54 523	7 415
Proceeds from sale of shares in related entities	0	0
Proceeds from sale of investment financial assets	424 007 441	443 087 221
Other	4 266	3 539
Outflows:	(435 681 529)	(455 762 656)
Acquisition of property, plant and equipment and intangible assets	(197 021)	(176 653)
Acquisition of shares in related entities	0	0
Acquisition of investment financial assets	(435 484 508)	(455 586 003)
Other	0	0
Net cash flows from investing activities	(11 615 299)	(12 664 481)

## C. CASH FLOWS FROM FINANCING ACTIVITIES

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>
Inflows from financing activities:	800 000	2 431 700
Long-term bank loans	0	0
Issue of debt securities	800 000	2 431 700
Increase in subordinated debt	0	0
Net proceeds from issues of shares and additional capital paid-in	0	0
Other inflows from financing activities	0	0
Outflows from financing activities:	(723 121)	(607 526)
Repayment of long-term bank loans	0	0
Redemption of debt securities	(56 000)	(86 948)
Decrease in subordinated debt	0	0
Issue of shares expenses	0	0
Redemption of shares	0	0
Dividends paid and other payments to owners	0	0
Payments of lease liabilities	(65 738)	(68 727)
Other outflows from financing activities	(601 383)	(451 851)
Net cash flows from financing activities	76 879	1 824 174
D. Net cash flows. Total (A + B + C)	1 314 452	(4 053 765)
- of which change resulting from FX differences	(8 912)	(4 938)
E. Cash and cash equivalents at the beginning of the reporting period	14 159 599	15 504 527
F. Cash and cash equivalents at the end of the reporting period (D + E)	15 474 051	11 450 762



## 2. GENERAL INFORMATION ABOUT ISSUER

Bank Millennium S.A. (the Bank) is a nationwide universal bank, offering its services to all market segments via a network of branches, corporate centres, individual advisors and mobile and electronic banking.

The Bank, entered under the number KRS 0000010186 in the National Court Register kept by the Local Court for the Capital City of Warsaw, 13th Business Department of the National Court Register, is seated in Warsaw, Stanisława Żaryna 2A.

The Bank is listed on the Warsaw Stock Exchange since 1992, first Bank ever to float its shares on the WSE.

The Bank is a parent company of Bank Millennium Capital Group (the Group) with over 6,800 employees with core business comprising banking (including mortgage bank), leasing, factoring, brokerage, capital operations, investment fund management and web portals activity.

### Supervisory Board and Management Board of Bank Millennium S.A. as at 30 September 2025

Composition of the Supervisory Board as at 30 September 2025 was as follows:

- Olga Grygier-Siddons - Chairman of the Supervisory Board,
- Nuno Manuel da Silva Amado – Deputy Chairman of the Supervisory Board,
- Katarzyna Sułkowska – Deputy Chairman and Secretary of the Supervisory Board,
- Małgorzata Bonikowska – Member of the Supervisory Board,
- Miguel de Campos Pereira de Bragança – Member of the Supervisory Board,
- Agnieszka Kłos-Siddiqui – Member of the Supervisory Board,
- Anna Mankiewicz-Rębkowska – Member of the Supervisory Board,
- Alojzy Nowak – Member of the Supervisory Board,
- Izabela Olszewska – Member of the Supervisory Board,
- Jose 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.

Composition of the Management Board at 30 September 2025 was as follows:

- Joao Nuno Lima Bras Jorge – Chairman of the Management Board,
- Fernando Maria Cardoso Rodrigues Bicho – Deputy Chairman of the Management Board,
- Wojciech Haase – Member of the Management Board,
- Jarosław Hermann – Member of the Management Board,
- Halina Karpińska – Member of the Management Board,
- Antonio Ferreira Pinto Junior – Member of the Management Board,
- Magdalena Zmitrowicz – Member of the Management Board.

## Capital Group of Bank Millennium S.A.

The Group's parent entity is Bank Millennium S.A. while the ultimate parent entity of the Bank Millennium S.A. is the Banco Comercial Portugues - company listed on the stock exchange in Lisbon. The companies that belong to the Capital Group as at 30 September 2025, are presented by the table below:

Company	Activity domain	Head office	% of the Group's capital share	% of the Group's voting share	Recognition in financial statements
MILLENNIUM BANK HIPOTECZNY S.A.	mortgage bank	Warsaw	100	100	full consolidation
MILLENNIUM LEASING Sp. z o.o.	leasing services	Warsaw	100	100	full consolidation
MILLENNIUM CONSULTING S.A.	advisory services	Warsaw	100	100	full consolidation
MILLENNIUM TFI S.A.	investment funds management	Warsaw	100	100	full consolidation
MILLENNIUM SERVICE Sp. z o.o.	rental and management of real estate, insurance and brokers activity	Warsaw	100	100	full consolidation
MILLENNIUM GOODIE Sp. z o.o.	web portals activity	Warsaw	100	100	full consolidation
MILLENNIUM TELECOMMUNICATION SERVICES Sp. z o.o.	financial operations - equity markets, advisory services	Warsaw	100	100	full consolidation
EUROPA MILLENNIUM FINANCIAL SERVICES Sp. z o.o.	activities of insurance agents and brokers	Wrocław	20	20	equity method valuation
LUBUSKIE FABRYKI MEBLI S.A. in liquidation*	furniture manufacturer	Świebodzin	50 (+1 share)	50 (+1 share)	(*)

\* The Group does not consolidate Lubuskie Fabryki Mebli S.A. due to the immateriality of this entity.

In the third quarter of 2025, the liquidation of Piast Expert Sp. z o.o. was completed, and as a result, the company ceased to be consolidated.

### 3. INTRODUCTION AND ACCOUNTING POLICY

These condensed consolidated interim financial statements have been prepared in accordance with International Accounting Standard IAS 34 Interim Financial Reporting as adopted by European Union. The condensed consolidated interim financial statement do not include all of the information which is presented in full annual financial statements, and should be read in conjunction with the consolidated financial statements of the Group as at and for the year ended 31 December 2024. The accounting principles adopted in the preparation of this condensed interim consolidated financial statement are the same as those applied in the Group's most recent annual financial statements for the year 2024, except for the principles related to income tax recognition, which are described in Note 11 'Corporate Income Tax' in Chapter 4 'Notes to the Consolidated Financial Data' and the changes in the presentation that have been described in this note.

Condensed interim consolidated financial statements of the Group prepared for the three and nine-month periods ended September 30, 2025.:

- include financial data of the Bank and its subsidiaries forming the Group, and data of associates accounted under the equity method;
- are prepared on the basis of the assumption of business continuity by the Group, namely scale of business is not to be reduced substantially in a period of not less than one year from the balance sheet date;
- have been prepared in PLN, and all values, unless otherwise indicated, are given in PLN rounded to one thousand.

Between July / August 2022 and May / June 2024 the Bank executed a Recovery Plan and a Capital Protection Plan in order to improve its capital ratios that had been impacted by the significant costs of the so-called credit holidays for PLN mortgage borrowers in addition to the significant costs that were being incurred related to FX mortgage legal risk.

All key assumptions of both plans were achieved, including all defined indicators reached mandatory levels, and the Group's profitability and financial results were improved. In the area of capital management, capital ratios have been restored to levels exceeding minimum regulatory requirements and the Bank and the Group also met MREL requirements, including the combined buffer requirements.

As of 30 September 2025, the Tier 1 ratio was 523 bps (Bank) and 461 bps (Group) above the minimum requirement, and the Total Capital Ratio (TCR) was 500 bps (Bank) and 422 bps (Group) above the minimum requirement.

In terms of MREL<sub>trea</sub> and MREL<sub>tem</sub> requirements, the Group presents a surplus compared to the minimum required levels (including the Combined Buffer Requirement) as of 30 September 2025 (MREL<sub>trea</sub> surplus was 640 pb. and MREL<sub>tem</sub> surplus 292 pb). Assuming no extraordinary factors, the Group plans to maintain both MREL ratios above the minimum required levels with a safe surplus.

The liquidity position of Bank Millennium Group remained strong in 3Q 2025; LCR ratio reached the level of 374% at the end of September 2025, loan-to-deposit ratio remained low at 58% and the share of liquid debt securities in the Group's total assets remains significant at 44%.

The Bank monitors, on the current basis, the financial situation in particular, the Bank is aware of the risks associated with further negative developments regarding the legal risk of FX mortgage loans that could imply the need to increase the level of provisions for such risk beyond the provisions that were recognized as at the balance sheet date and whose amount results from previous trends. In the Bank's view, these events, if materialized, would adversely affect the results of the Bank/Group in future, and would reduce the organic generation of capital that is envisaged, but would not prevent the Bank/Group from continuing to implement its strategy and the generation of results that would mitigate the impact of such events.

Taking into account the above circumstances and identified risks and uncertainties, the Bank's Management Board based on the analysis of all aspects of the Bank's operations and its current and forecast financial position, concluded that the application of the going concern assumption in the preparation of these financial statements is appropriate.

The Management Board approved these condensed consolidated interim financial statements on 23<sup>rd</sup> October 2025.

### **New standards, interpretations and amendments to published standards**

In this interim condensed consolidated financial statement, the Group has applied the following amendments to standards and interpretations that were endorsed by the European Union with an effective date for annual periods beginning on or after January 1, 2025:

<b>change</b>	<b>impact on the Group's financial statements</b>
Amendments to IAS 21 The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability	The amendment did not have a material impact on the financial statements

During the reporting period and up to the date of publication of these financial statements, the following accounting standards/amendments to standards were endorsed by the European Union.:

<b>change</b>	<b>impact on the Group's financial statements</b>
Contracts Referencing Nature-dependent Electricity: Amendments to IFRS 9 and IFRS 7	The Group estimates that the amendment will not have a material impact on the financial statements.
Amendments to the Classification and Measurement of Financial Instruments: Amendments to IFRS 9 and IFRS 7	The Group estimates that the amendment will not have a material impact on the financial statements.
Annual MSSF changes – version 11	The Group estimates that the amendment will not have a material impact on the financial statements.

### **Change in the presentation of data implemented in 2025 and the restatement of comparative data**

In this quarterly financial report for the IIIQ of 2025, compared to the report for the IIIQ of 2024 and the annual report for 2024, the Group has introduced below presented changes in the presentation of selected financial data in order to enhance the transparency of disclosures, better reflect the economic substance of the transactions concluded, and align with observed changes in market practice. The changes introduced had no impact on the net result for the 3- and 9-month periods ended September 30, 2024, nor on the value of equity as of December 31, 2024.

#### **1) Changes to the Income Statement:**

a) A dedicated line item "Legal risk costs related to foreign currency mortgage loans" has been introduced. This item includes not only the costs of provisions previously presented under 'Provisions for legal risk related to foreign currency mortgage loans' and included amounts related to the recognized adjustment of the gross carrying amount of foreign currency loans as well as amounts recorded under the 'Provisions' line item, but also period costs related to settlements concluded on the Bank's terms (previously included in 'Net trading income'), costs of settlements concluded under KNF terms (previously presented as 'Modification result'), as well as legal representation costs and statutory interest (previously included in 'Other operating expenses');

b) The modification result related to non-significant modifications of exposures with recognized impairment has been reclassified to 'Impairment losses on financial assets', previously, this result was presented under 'Modification result';

c) Interest related to the receivables from repurchase agreement transactions, for which a change in presentation was made to trading assets (as described in Note 2e), was transferred from the item 'Interest income from Financial assets at amortised cost' to the item 'Result of similar nature to interest from Financial assets at fair value through profit or loss'.

## 2) Changes to the Statement of Financial Position:

a) Within individual portfolios of financial assets, a separate line item 'Assets pledged as collateral' has been introduced. This item presents assets that may be pledged or sold by the collateral taker (in accordance with IFRS 9, such assets must be presented separately). This new item includes debt securities sold with a repurchase agreement clause under repo or sell-buy-back transactions;

b) Provisions for retirement benefits have been reclassified from "Other liabilities" to a separate line within the 'Provisions' section;

c) The values of variation margin deposits securing derivative transactions concluded via clearing houses have been offset against the valuation of derivatives;

d) Items 'Property, plant and equipment' and 'Intangible assets' were reduced by the amount of future expenditures, with a corresponding entry under 'Other liabilities' – costs payable;

e) A change in presentation was made for a part of receivables from repurchase transactions involving debt securities from the trading portfolio, from assets measured at amortised cost to financial assets held for trading.

## 3) Changes to the Statement of Cash Flows:

a) The definition of cash equivalents has been revised in the case of securities issued by the State Treasury or the Central Bank. Previously, all such securities with a maturity of up to 3 months as at the balance sheet date were classified as cash equivalents. Now, only those securities that had a maturity of up to 3 months at the time of acquisition and were acquired for the purpose of covering short-term financial liabilities, are included;

b) A separate line item "Interest income/expense result (from the Profit and loss statement)" has been introduced in the Cash flows from operating activities section. Previously, interest accrued during the reporting period was presented within changes in individual balance sheet items;

c) A separate line item 'Income tax (from the Profit and loss statement)' has been introduced and the amount presented under the line item 'Income tax paid' was adjusted accordingly;

d) Payments related to lease liabilities (principal portion) were presented under the line item 'Lease liability payments' in the Cash Flows from Financing Activities section; previously, these cash flows were presented under 'Change in amounts due to customers' in the Cash Flows from Operating Activities section;

e) Cash flows related to the issuance and repayment/redemption of financial liabilities arising from the issuance of debt securities were presented under Cash Flows from Financing Activities; previously, these cash flows were presented under Cash Flows from Operating Activities in the line item 'Change in liabilities from the issuance of debt securities'.

With a view to ensuring data comparability, all comparative data presented in this Group's financial statement have been appropriately restated, as shown below in tabular form.

**Changes to the Statement of Profit or Loss:**

Amount '000 PLN	01.01.2024 - 30.09.2024 data previously published	Change 1a)	Change 1b)	Change 1c)	01.01.2024 - 30.09.2024 restated data
Net interest income	4 024 899	0	0	0	4 024 899
Interest income and other of similar nature	6 487 795	0	0	0	6 487 795
Income calculated using the effective interest method	6 407 385	0	0	(34 789)	6 372 596
Interest income from Financial assets at amortised cost, of which:	5 411 939	0	0	(34 789)	5 377 150
- the impact of the adjustment to the gross carrying amount of loans due to credit holidays	(157 306)	0	0	0	(157 306)
Interest income from Financial assets at fair value through other comprehensive income	995 446	0	0	0	995 446
Result of similar nature to interest from Financial assets at fair value through profit or loss	80 410	0	0	34 789	115 199
Interest expenses	(2 462 896)	0	0	0	(2 462 896)
Net fee and commission income	588 755	0	0	0	588 755
Fee and commission income	799 242	0	0	0	799 242
Fee and commission expenses	(210 487)	0	0	0	(210 487)
Dividend income	3 539	0	0	0	3 539
Result on derecognition of financial assets and liabilities not measured at fair value through profit or loss	(1 133)	0	0	0	(1 133)
Results on financial assets and liabilities held for trading	(4 767)	0	0	0	(4 767)
Result on non-trading financial assets mandatorily at fair value through profit or loss	9 871	0	0	0	9 871
Result on hedge accounting	201	0	0	0	201
Result on exchange differences	(119 242)	288 611	0	0	169 369
Other operating income	275 958	0	0	0	275 958
Other operating expenses	(374 073)	101 657	0	0	(272 416)
Administrative expenses	(1 489 393)	0	0	0	(1 489 393)
Impairment losses on financial assets	(278 187)	0	(25 666)	0	(303 853)
Impairment losses on non-financial assets	(4 353)	0	0	0	(4 353)
Legal risk expenses connected with FX mortgage loans, of which:	(1 656 390)	(474 133)	0	0	(2 130 523)
Provisions for legal risk	(1 656 390)	0	0	0	(1 656 390)
Result on modification	(111 424)	83 865	25 666	0	(1 893)
Depreciation	(167 001)	0	0	0	(167 001)
Share of the profit of investments in subsidiaries	0	0	0	0	0
Banking tax	(133 512)	0	0	0	(133 512)
Profit before income taxes	563 748	0	0	0	563 748
Corporate income tax	(17 052)	0	0	0	(17 052)
Profit after taxes	546 696	0	0	0	546 696

Amount '000 PLN	01.07.2024 - 30.09.2024 data previously published	Change 1a)	Change 1b)	Change 1c	01.07.2024 - 30.09.2024 restated data
Net interest income	1 489 082	0	0	0	1 489 082
Interest income and other of similar nature	2 313 169	0	0	0	2 313 169
Income calculated using the effective interest method	2 290 552	0	0	(10 423)	2 280 129
Interest income from Financial assets at amortised cost, of which:	1 932 939	0	0	(10 423)	1 922 516
- the impact of the adjustment to the gross carrying amount of loans due to credit holidays	43 740	0	0	0	43 740
Interest income from Financial assets at fair value through other comprehensive income	357 613	0	0	0	357 613
Result of similar nature to interest from Financial assets at fair value through profit or loss	22 617	0	0	10 423	33 040
Interest expenses	(824 087)	0	0	0	(824 087)
Net fee and commission income	198 634	0	0	0	198 634
Fee and commission income	274 671	0	0	0	274 671
Fee and commission expenses	(76 037)	0	0	0	(76 037)
Dividend income	150	0	0	0	150
Result on derecognition of financial assets and liabilities not measured at fair value through profit or loss	(400)	0	0	0	(400)
Results on financial assets and liabilities held for trading	(2 578)	0	0	0	(2 578)
Result on non-trading financial assets mandatorily at fair value through profit or loss	4 073	0	0	0	4 073
Result on hedge accounting	1 657	0	0	0	1 657
Result on exchange differences	(32 641)	88 601	0	0	55 960
Other operating income	106 280	0	0	0	106 280
Other operating expenses	(104 472)	34 676	0	0	(69 796)
Administrative expenses	(495 641)	0	0	0	(495 641)
Impairment losses on financial assets	(105 857)	0	(7 520)	0	(113 377)
Impairment losses on non-financial assets	(2 257)	0	0	0	(2 257)
Legal risk expenses connected with FX mortgage loans, of which:	(532 800)	(164 888)	0	0	(697 688)
Provisions for legal risk	(532 800)	0	0	0	(532 800)
Result on modification	(49 575)	41 611	7 520	0	(444)
Depreciation	(57 492)	0	0	0	(57 492)
Share of the profit of investments in subsidiaries	0	0	0	0	0
Banking tax	(98 990)	0	0	0	(98 990)
Profit before income taxes	317 173	0	0	0	317 173
Corporate income tax	(127 410)	0	0	0	(127 410)
Profit after taxes	189 763	0	0	0	189 763



**Changes to the Statement of Financial Position:**
**ASSETS**

<i>Amount '000 PLN</i>	<i>2024-12-31 data previously published</i>	<i>Change 2a)</i>	<i>Change 2b)</i>	<i>Change 2c)</i>	<i>Change 2d)</i>	<i>Change 2e)</i>	<i>2024-12-31 restated data</i>
Cash, cash balances at central banks	5 178 984	0	0	0	0	0	5 178 984
Financial assets held for trading	811 324	0	0	0	0	194 218	1 005 542
Derivatives	255 845	0	0	0	0	0	255 845
Equity instruments	115	0	0	0	0	0	115
Debt securities, of which:	555 364	0	0	0	0	0	555 364
Securities underlying the sale and repurchase agreements	0	194 088	0	0	0	0	194 088
Reverse sale and repurchase agreements	0	0	0	0	0	194 218	194 218
Non-trading financial assets mandatorily at fair value through profit or loss, other than Loans and advances to customers	118 399	0	0	0	0	0	118 399
Equity instruments	66 609	0	0	0	0	0	66 609
Debt securities	51 790	0	0	0	0	0	51 790
Financial assets at fair value through other comprehensive income	29 255 449	0	0	0	0	0	29 255 449
Equity instruments	36 712	0	0	0	0	0	36 712
Debt securities	29 218 737	0	0	0	0	0	29 218 737
Loans and advances to customers	74 981 215	0	0	(5 900)	0	0	74 975 315
Mandatorily at fair value through profit or loss	1 825	0	0	0	0	0	1 825
Valued at amortised cost	74 979 390	0	0	(5 900)	0	0	74 973 490
Financial assets at amortised cost other than Loans and advances to customers	25 010 220	0	0	0	0	(194 218)	24 816 002
Debt securities	24 381 485	0	0	0	0	0	24 381 485
Deposits, loans and advances to banks and other monetary institutions	434 517	0	0	0	0	0	434 517
Reverse sale and repurchase agreements	194 218	0	0	0	0	(194 218)	0
Derivatives – Hedge accounting	112 365	0	0	(112 365)	0	0	0
Investments in subsidiaries, joint ventures and associates	44 012	0	0	0	0	0	44 012
Tangible fixed assets	588 741	0	0	0	(56 515)	0	532 226
Intangible fixed assets	557 309	0	0	0	(22 892)	0	534 417
Income tax assets	713 777	0	0	0	0	0	713 777
Current income tax assets	343	0	0	0	0	0	343
Deferred income tax assets	713 434	0	0	0	0	0	713 434
Other assets	1 765 188	0	0	0	0	0	1 765 188
Non-current assets and disposal groups classified as held for sale	14 549	0	0	0	0	0	14 549
<b>Total assets</b>	<b>139 151 532</b>	<b>0</b>	<b>0</b>	<b>(118 265)</b>	<b>(79 407)</b>	<b>0</b>	<b>138 953 860</b>

**LIABILITIES AND EQUITY**

<i>Amount '000 PLN</i>	<i>2024-12-31 data previously published</i>	<i>Change 2a)</i>	<i>Change 2b)</i>	<i>Change 2c)</i>	<i>Change 2d)</i>	<i>Change 2e)</i>	<i>2024-12-31 restated data</i>
<b>LIABILITIES</b>							
Financial liabilities held for trading	417 073	0	0	0	0	0	417 073
Derivatives	226 304	0	0	0	0	0	226 304
Liabilities from short sale of securities	190 769	0	0	0	0	0	190 769
Financial liabilities measured at amortised cost	125 455 365	0	0	(112 365)	0	0	125 343 000
Liabilities to banks and other monetary institutions	316 824	0	0	(112 365)	0	0	204 459
Liabilities to customers	117 257 213	0	0	0	0	0	117 257 213
Sale and repurchase agreements	194 223	0	0	0	0	0	194 223
Debt securities issued	6 124 775	0	0	0	0	0	6 124 775
Subordinated debt	1 562 330	0	0	0	0	0	1 562 330
Derivatives – Hedge accounting	107 439	0	0	(5 900)	0	0	101 539
Provisions	2 900 586	0	51 166	0	0	0	2 951 752
Legal issues	2 847 003	0	0	0	0	0	2 847 003
Commitments and guarantees given	53 583	0	0	0	0	0	53 583
Retirement benefits	0	0	51 166	0	0	0	51 166
Income tax liabilities	223 767	0	0	0	0	0	223 767
Current income tax liabilities	220 659	0	0	0	0	0	220 659
Deferred income tax liabilities	3 108	0	0	0	0	0	3 108
Other liabilities	2 275 668	0	(51 166)	0	(79 407)	0	2 145 095
<b>Total Liabilities</b>	<b>131 379 898</b>	<b>0</b>	<b>0</b>	<b>(118 265)</b>	<b>(79 407)</b>	<b>0</b>	<b>131 182 226</b>
<b>EQUITY</b>							
Share capital	1 213 117	0	0	0	0	0	1 213 117
Own shares	(21)	0	0	0	0	0	(21)
Share premium	1 147 502	0	0	0	0	0	1 147 502
Accumulated other comprehensive income	(59 984)	0	0	0	0	0	(59 984)
Retained earnings	5 471 020	0	0	0	0	0	5 471 020
Total equity	7 771 634	0	0	0	0	0	7 771 634
Total equity and total liabilities	139 151 532	0	0	(118 265)	(79 407)	0	138 953 860

**ASSETS**

<i>Amount '000 PLN</i>	<i>2023-12-31 data previously published</i>	<i>Change 2a)</i>	<i>Change 2b)</i>	<i>Change 2c)</i>	<i>Change 2d)</i>	<i>Change 2e)</i>	<i>2023-12-31 restated data</i>
Cash, cash balances at central banks	5 094 984	0	0	0	0	0	5 094 984
Financial assets held for trading	608 924	0	0	0	0	11 562	620 486
Derivatives	498 249	0	0	0	0	0	498 249
Equity instruments	121	0	0	0	0	0	121
Debt securities, of which:	110 554	0	0	0	0	0	110 554
Securities underlying the sale and repurchase agreements	0	0	0	0	0	0	0
Reverse sale and repurchase agreements	0	0	0	0	0	11 562	11 562
Non-trading financial assets mandatorily at fair value through profit or loss, other than Loans and advances to customers	147 623	0	0	0	0	0	147 623
Equity instruments	66 609	0	0	0	0	0	66 609
Debt securities	81 014	0	0	0	0	0	81 014
Financial assets at fair value through other comprehensive income	22 096 199	0	0	0	0	0	22 096 199
Equity instruments	28 793	0	0	0	0	0	28 793
Debt securities	22 067 407	0	0	0	0	0	22 067 407
Loans and advances to customers	73 643 060	0	0	(27 964)	0	0	73 615 096
Mandatorily at fair value through profit or loss	19 349	0	0	0	0	0	19 349
Valued at amortised cost	73 623 711	0	0	(27 964)	0	0	73 595 747
Financial assets at amortised cost other than Loans and advances to customers	20 706 586	0	0	0	0	(11 562)	20 695 024
Debt securities	18 749 907	0	0	0	0	0	18 749 907
Deposits, loans and advances to banks and other monetary institutions	793 436	0	0	0	0	0	793 436
Reverse sale and repurchase agreements	1 163 242	0	0	0	0	(11 562)	1 151 680
Derivatives – Hedge accounting	74 213	0	0	(59 144)	0	0	15 069
Investments in subsidiaries, joint ventures and associates	52 509	0	0	0	0	0	52 509
Tangible fixed assets	565 630	0	0	0	(35 754)	0	529 876
Intangible fixed assets	481 631	0	0	0	(16 206)	0	465 425
Income tax assets	486 803	0	0	0	0	0	486 803
Current income tax assets	1 810	0	0	0	0	0	1 810
Deferred income tax assets	484 993	0	0	0	0	0	484 993
Other assets	1 544 328	0	0	0	0	0	1 544 328
Non-current assets and disposal groups classified as held for sale	17 514	0	0	0	0	0	17 514
<b>Total assets</b>	<b>125 520 004</b>	<b>0</b>	<b>0</b>	<b>(87 108)</b>	<b>(51 960)</b>	<b>0</b>	<b>125 380 936</b>

**LIABILITIES AND EQUITY**

<i>Amount '000 PLN</i>	<i>2023-12-31 data previously published</i>	<i>Change 2a)</i>	<i>Change 2b)</i>	<i>Change 2c)</i>	<i>Change 2d)</i>	<i>Change 2e)</i>	<i>2023-12-31 restated data</i>
<b>LIABILITIES</b>							
Financial liabilities held for trading	579 553	0	0	0	0	0	579 553
Derivatives	576 833	0	0	0	0	0	576 833
Liabilities from short sale of securities	2 720	0	0	0	0	0	2 720
Financial liabilities measured at amortised cost	112 692 833	0	0	(59 144)	0	0	112 633 689
Liabilities to banks and other monetary institutions	563 512	0	0	(59 144)	0	0	504 368
Liabilities to customers	107 246 428	0	0	0	0	0	107 246 428
Sale and repurchase agreements	0	0	0	0	0	0	0
Debt securities issued	3 317 849	0	0	0	0	0	3 317 849
Subordinated debt	1 565 045	0	0	0	0	0	1 565 045
Derivatives – Hedge accounting	193 664	0	0	(27 964)	0	0	165 700
Provisions	1 445 471	0	48 328	0	0	0	1 493 799
Legal issues	1 403 105	0	0	0	0	0	1 403 105
Commitments and guarantees given	42 367	0	0	0	0	0	42 367
Retirement benefits		0	48 328	0	0	0	48 328
Income tax liabilities	461 456	0	0	0	0	0	461 456
Current income tax liabilities	461 217	0	0	0	0	0	461 217
Deferred income tax liabilities	240	0	0	0	0	0	240
Other liabilities	3 252 131	0	(48 328)	0	(51 960)	0	3 151 843
<b>Total Liabilities</b>	<b>118 625 109</b>	<b>0</b>	<b>0</b>	<b>(87 108)</b>	<b>(51 960)</b>	<b>0</b>	<b>118 486 041</b>
<b>EQUITY</b>							
Share capital	1 213 117	0	0	0	0	0	1 213 117
Own shares	(21)	0	0	0	0	0	(21)
Share premium	1 147 502	0	0	0	0	0	1 147 502
Accumulated other comprehensive income	(217 512)	0	0	0	0	0	(217 512)
Retained earnings	4 751 809	0	0	0	0	0	4 751 809
Total equity	6 894 895	0	0	0	0	0	6 894 895
Total equity and total liabilities	125 520 004	0	0	(87 108)	(51 960)	0	125 380 936

**Changes to the Statement of Cash Flows:**
**A. CASH FLOWS FROM  
OPERATING ACTIVITIES**

<i>Amount '000 PLN</i>	1.01.2024 - 30.09.2024 data previously published	Change 3a)	Change 3b)	Change 3c)	Change 3d)	Change 3e)	Adjustments resulting from changes in the statement of financial position	1.01.2024 - 30.09.2024 restated data
Profit (loss) after taxes	546 696	0	0	0	0	0	0	546 696
Total adjustments:	7 412 064	2 790	(1 722 816)	0	67 828	439 165	40 815	6 239 846
Interest income/expense result (from the Profit and loss statement)	0	0	(4 024 898)	0	0	0	0	(4 024 898)
Interest received	6 144 549	0	163 689	0	0	0	0	6 308 238
Interest paid	(2 467 075)	0	0	0	0	352 217	0	(2 114 858)
Depreciation and amortization	167 001	0	0	0	0	0	0	167 001
Foreign exchange (gains)/ losses	0	0	0	0	0	(25 565)	0	(25 565)
Dividends	(3 539)	0	0	0	0	0	0	(3 539)
Changes in provisions	1 325 816	0	0	0	0	0	229	1 326 045
Result on sale and liquidation of investing activity assets	(2 320)	0	0	0	0	0	0	(2 320)
Change in financial assets held for trading	(195 861)	2 790	67 168	0	0	0	10 885	(115 018)
Change in loans and advances to banks	40 277	0	20 668	0	0	0	0	60 945
Change in loans and advances to customers	(6 297 618)	0	4 468 159	0	0	0	(9 937)	(1 839 396)
Change in receivables from securities bought with sell-back clause (loans and advances)	912 102	0	34 789	0	0	0	0	946 891
Change in financial liabilities valued at fair value through profit and loss (held for trading)	1 680	0	0	0	0	0	9 937	11 617
Change in deposits from banks	(257 867)	0	(11 066)	0	0	0	(10 885)	(279 818)
Change in deposits from customers	8 810 064	0	(2 018 354)	0	67 828	0	0	6 859 538
Change in liabilities from securities sold with buy-back clause	243 551	0	(27 190)	0	0	0	0	216 361
Change in debt securities issued	196 766	0	(301 676)	0	0	112 513	0	7 603
Change in the balance of income tax-related receivables and payables	(387 212)	0	0	387 212	0	0	0	0
Income tax (from the Profit and loss statement)	0	0	0	17 051	0	0	0	17 051
Income tax paid	(177 780)	0	0	(410 400)	0	0	0	(588 180)
Change in the balance of other assets and liabilities	(734 575)	0	0	6 137	0	0	40 586	(687 852)
Change in other items	94 105	0	(94 105)	0	0	0	0	0
Net cash flows from operating activities	7 958 760	2 790	(1 722 816)	0	67 828	439 165	40 815	6 786 542

**B. CASH FLOWS FROM  
INVESTING ACTIVITIES**

Amount '000 PLN	1.01.2024 - 30.09.2024 data previously published	Change 3a)	Change 3b)	Change 3c)	Change 3d)	Change 3e)	Adjustments resulting from changes in the statement of financial position	1.01.2024 - 30.09.2024 restated data
Inflows:	443 098 175	0	0	0	0	0	0	443 098 175
Proceeds from sale of property, plant and equipment and intangible assets	7 415	0	0	0	0	0	0	7 415
Proceeds from sale of shares in related entities	0	0	0	0	0	0	0	0
Proceeds from sale of investment financial assets	443 087 221	0	0	0	0	0	0	443 087 221
Other	3 539	0	0	0	0	0	0	3 539
Outflows:	(458 311 795)	867 138	1 722 816	0	0	0	(40 815)	(455 762 656)
Acquisition of property, plant and equipment and intangible assets	(135 838)	0	0	0	0	0	(40 815)	(176 653)
Acquisition of shares in related entities	0	0	0	0	0	0	0	0
Acquisition of investment financial assets	(458 175 957)	867 138	1 722 816	0	0	0	0	(455 586 003)
Other	0	0	0	0	0	0	0	0
Net cash flows from investing activities	(15 213 620)	867 138	1 722 816	0	0	0	(40 815)	(12 664 481)

**C. CASH FLOWS FROM  
FINANCING ACTIVITIES**

Amount '000 PLN	1.01.2024 - 30.09.2024 data previously published	Change 3a)	Change 3b)	Change 3c)	Change 3e)	Change 3f)	Adjustments resulting from changes in the statement of financial position	1.01.2024 - 30.09.2024 restated data
Inflows from financing activities:	2 431 700	0	0	0	0	0	0	2 431 700
Long-term bank loans	0	0	0	0	0	0	0	0
Issue of debt securities	2 431 700	0	0	0	0	0	0	2 431 700
Increase in subordinated debt	0	0	0	0	0	0	0	0
Net proceeds from issues of shares and additional capital paid-in	0	0	0	0	0	0	0	0
Other inflows from financing activities	0	0	0	0	0	0	0	0
Outflows from financing activities:	(99 634)	0	0	0	(68 727)	(439 165)	0	(607 526)
Repayment of long-term bank loans	0	0	0	0	0	0	0	0
Redemption of debt securities	0	0	0	0	0	(86 948)	0	(86 948)
Decrease in subordinated debt	0	0	0	0	0	0	0	0
Issue of shares expenses	0	0	0	0	0	0	0	0
Redemption of shares	0	0	0	0	0	0	0	0
Dividends paid and other payments to owners	0	0	0	0	0	0	0	0
Payments of lease liabilities	0	0	0	0	(68 727)	0	0	(68 727)
Other outflows from financing activities	(99 634)	0	0	0	0	(352 217)	0	(451 851)
Net cash flows from financing activities	2 332 066	0	0	0	(68 727)	(439 165)	0	1 824 174
D. Net cash flows. Total (A + B + C)	(4 922 794)	869 928	0	0	(899)	0	0	(4 053 765)
- of which change resulting from FX differences	(4 938)	0	0	0	0	0	0	(4 938)
E. Cash and cash equivalents at the beginning of the reporting period	18 499 347	(2 994 820)	0	0	0	0	0	15 504 527
F. Cash and cash equivalents at the end of the reporting period (D + E)	13 576 553	(2 124 892)	0	0	(899)	0	0	11 450 762

## 4. NOTES TO CONSOLIDATED FINANCIAL DATA

### 1) INTEREST INCOME AND OTHER OF SIMILAR NATURE

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Interest income from Financial assets at fair value through other comprehensive income	1 286 331	463 779	995 446	357 613
Debt securities	1 286 331	463 779	995 446	357 613
Interest income from Financial assets at amortised cost	5 472 635	1 786 079	5 377 150	1 922 516
Balances with the Central Bank	163 688	51 803	163 690	56 661
Loans and advances to customers, of which:	4 404 524	1 419 715	4 465 422	1 605 306
- the impact of the adjustment to the gross carrying amount of loans due to credit holidays	0	0	(157 306)	43 740
Debt securities	866 999	297 203	727 370	252 307
Deposits, loans and advances to banks	16 794	6 848	20 668	8 242
Hedging derivatives	20 630	10 510	0	0
Result of similar nature to interest of which:	88 963	29 718	115 199	33 040
Loans and advances to customers mandatorily at fair value through profit or loss	911	91	2 737	1 049
Financial assets and liabilities held for trading - derivatives	30 606	11 428	68 729	18 967
Financial assets held for trading - debt securities	17 957	5 116	8 944	2 601
Financial assets held for trading - Transactions with repurchase agreements	39 489	13 083	34 789	10 423
<b>Total</b>	<b>6 847 929</b>	<b>2 279 576</b>	<b>6 487 795</b>	<b>2 313 169</b>

Interest income for the 3 quarters 2025 contains interest accrued on impaired loans in the amount of PLN 123,416 thous. (for corresponding data in the year 2024 the amount of such interest stood at PLN 138,871 thous.).

In the line „Hedging derivatives” the Group presents net interest income from derivatives set as and being effective cash flow and fair value hedges. A detailed description of the hedging relations used by the Group is presented in **note (16)**.

### 2) INTEREST EXPENSES AND OTHER OF SIMILAR NATURE

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Financial liabilities measured at amortised cost	(2 530 414)	(833 859)	(2 462 896)	(824 087)
Liabilities to banks and other monetary institutions	(12 026)	(4 510)	(11 066)	(4 812)
Liabilities to customers	(1 972 774)	(648 267)	(2 009 789)	(665 037)
Transactions with repurchase agreement	(23 045)	(5 444)	(27 190)	(12 528)
Debt securities issued	(422 616)	(143 596)	(301 676)	(104 344)
Subordinated debt	(89 533)	(28 409)	(94 104)	(31 475)
Liabilities due to leasing agreements	(10 420)	(3 633)	(8 566)	(2 979)
Hedging derivatives	0	0	(10 505)	(2 912)
Other	0	0	0	0
<b>Total</b>	<b>(2 530 414)</b>	<b>(833 859)</b>	<b>(2 462 896)</b>	<b>(824 087)</b>



### 3) FEE AND COMMISSION INCOME

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Resulting from accounts service	84 760	28 395	84 812	28 554
Resulting from money transfers, cash payments and withdrawals and other payment transactions	80 725	27 314	75 612	25 996
Resulting from loans granted	146 800	47 619	153 423	48 280
Resulting from guarantees and sureties granted	10 320	3 430	10 237	3 367
Resulting from payment and credit cards	253 397	89 361	237 179	82 190
Resulting from sale of insurance products	54 495	24 018	106 419	39 190
Resulting from distribution of investment funds units and other savings products	23 207	7 509	21 083	7 247
Resulting from brokerage and custody service	11 758	3 655	10 157	3 381
Resulting from investment funds managed by the Group	88 623	32 620	64 023	23 618
Other	41 075	13 734	36 297	12 848
<b>Total</b>	<b>795 160</b>	<b>277 655</b>	<b>799 242</b>	<b>274 671</b>

### 4) FEE AND COMMISSION EXPENSE

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Resulting from accounts service	(37 347)	(10 439)	(32 813)	(10 689)
Resulting from money transfers, cash payments and withdrawals and other payment transactions	(3 356)	(1 063)	(3 341)	(1 048)
Resulting from loans granted	(42 640)	(15 668)	(26 486)	(11 721)
Resulting from payment and credit cards	(73 358)	(25 091)	(89 788)	(33 040)
Resulting from brokerage and custody service	(2 485)	(664)	(2 045)	(650)
Resulting from investment funds managed by the Group	(12 586)	(4 368)	(9 541)	(3 259)
Resulting from insurance activity	(6 326)	(1 441)	(6 693)	(1 634)
Other	(42 084)	(14 577)	(39 780)	(13 996)
<b>Total</b>	<b>(220 182)</b>	<b>(73 311)</b>	<b>(210 487)</b>	<b>(76 037)</b>

### 5) RESULT ON DERECOGNITION OF FINANCIAL ASSETS AND LIABILITIES NOT MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Operations on debt instruments	(1 311)	17	143	6
Costs of financial operations	(1 948)	(887)	(1 276)	(406)
<b>Total</b>	<b>(3 259)</b>	<b>(870)</b>	<b>(1 133)</b>	<b>(400)</b>

## 6) RESULTS ON FINANCIAL ASSETS AND LIABILITIES HELD FOR TRADING

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Result on debt instruments	7 611	4 086	2 314	1 233
Result on derivatives	10 291	560	(7 093)	(3 805)
Result on other financial operations	28	13	12	(6)
<b>Total</b>	<b>17 930</b>	<b>4 659</b>	<b>(4 767)</b>	<b>(2 578)</b>

## 7) RESULTS NON-TRADING FINANCIAL ASSETS MANDATORILY AT FAIR VALUE THROUGH PROFIT OR LOSS

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Loans and advances to customers	451	255	3 173	(414)
Result on equity instruments	85 036	30 065	45 285	45 285
Result on debt instruments	(30 564)	(30 078)	(38 587)	(40 798)
<b>Total</b>	<b>54 923</b>	<b>242</b>	<b>9 871</b>	<b>4 073</b>

## 8) ADMINISTRATIVE EXPENSES

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Staff costs:	(1 007 608)	(338 980)	(887 213)	(303 250)
Salaries	(818 041)	(284 335)	(726 233)	(249 675)
Surcharges on pay	(143 771)	(48 700)	(128 872)	(43 265)
Employee benefits, of which:	(45 796)	(5 945)	(32 108)	(10 310)
- provisions for retirement benefits	(4 565)	(1 522)	(4 385)	(1 462)
- provisions for unused employee holiday	(9 658)	5 825	(19)	(13)
- other	(31 573)	(10 248)	(27 704)	(8 835)
Other administrative expenses:	(722 484)	(232 739)	(602 180)	(192 391)
Costs of advertising, promotion and representation	(69 144)	(23 135)	(59 970)	(18 876)
IT and communications costs	(159 636)	(64 796)	(122 511)	(44 151)
Costs of renting	(40 608)	(13 206)	(43 636)	(14 250)
Costs of buildings maintenance, equipment and materials	(41 037)	(13 089)	(40 623)	(14 006)
ATM and cash maintenance costs	(26 809)	(8 697)	(27 089)	(8 902)
Costs of consultancy, audit and legal advisory and translation	(109 300)	(30 110)	(117 097)	(39 485)
Taxes and fees	(37 882)	(11 275)	(35 447)	(11 697)
KIR - clearing charges	(11 895)	(3 898)	(11 016)	(3 671)
PFRON costs	(7 619)	(2 614)	(7 085)	(2 390)
Banking Guarantee Fund costs	(130 898)	(18 277)	(60 850)	0
Financial Supervision costs	(15 316)	(5 080)	(13 088)	(4 327)
Other	(72 339)	(38 561)	(63 768)	(30 636)
<b>Total</b>	<b>(1 730 091)</b>	<b>(571 718)</b>	<b>(1 489 393)</b>	<b>(495 641)</b>

## 9) IMPAIRMENT LOSSES ON FINANCIAL ASSETS

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Impairment losses on loans and advances to customers	(139 490)	(62 892)	(311 881)	(119 102)
Impairment charges on loans and advances to customers	(1 070 246)	(287 818)	(1 260 747)	(349 835)
Reversal of impairment charges on loans and advances to customers	827 594	218 358	900 478	229 741
Amounts recovered from loans written off	26 223	7 281	28 804	8 501
Sale of receivables	86 430	0	45 221	0
Other directly recognised in profit and loss	(9 491)	(713)	(25 637)	(7 509)
Impairment losses on securities	(8)	0	(1)	4
Impairment charges on securities	(8)	0	(1)	4
Reversal of impairment charges on securities	0	0	0	0
Impairment losses on off-balance sheet liabilities	(39 641)	(39 819)	8 029	5 720
Impairment charges on off-balance sheet liabilities	(88 550)	(50 674)	(32 125)	(4 661)
Reversal of impairment charges on off-balance sheet liabilities	48 909	10 855	40 154	10 381
<b>Total</b>	<b>(179 139)</b>	<b>(102 711)</b>	<b>(303 853)</b>	<b>(113 378)</b>

## 10) LEGAL RISK COSTS RELATED TO FOREIGN CURRENCY MORTGAGE LOANS

In the case of the portfolio of foreign currency mortgage loans, claims filed by customers, primarily concerning the declaration of invalidity of the agreement and the return of paid principal and interest installments, as well as settlements offered to borrowers by the Bank, have a significant impact on the amount and repayment dates of the expected cash flows resulting from the loan agreement estimated by the Bank. Taking the above into account, the Bank believes that the appropriate way to reflect the legal risk related to the portfolio of active foreign currency mortgage loans is to apply the provisions of IFRS 9 paragraph B5.4.6, which in practice means reducing the gross carrying amount of these loans in order to reflect the current estimates of cash flows from these agreements.

As regards following:

- (i) repaid foreign currency mortgage loans;
- (ii) active loans, for which the loss due to legal risk exceeds the current carrying amount (for that excess);
- (iii) for the expected outflow of cash that does not represent a return of contractual cash flows, the provisions of IAS 37 are applied, according to which the Bank creates a provision for court cases, recognizing it in the balance sheet as a component of provisions for claims.

**Legal risk costs related to foreign currency mortgage loans**

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Costs of provisions for legal risk related with FX mortgage loans	(1 503 209)	(484 609)	(1 656 390)	(532 800)
Other costs	(66 787)	0	(474 133)	(164 887)
Total	(1 569 996)	(484 609)	(2 130 523)	(697 687)

In the first half of 2025, the Bank introduced changes to the presentation of financial data, among others in the area of legal risk costs related to foreign currency mortgage loans. Details of these changes are presented in Chapter 3. INTRODUCTION AND ACCOUNTING POLICIES – Changes in data presentation implemented in 2025, item 1) a.

**Costs of provisions for legal risk related with FX mortgage loans**

01.01.2025 – 30.09.2025	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	8 463 696	5 665 224	2 798 472
Utilization of provisions during the period	(2 197 186)	(1 304 823)	(892 363)
Costs of provisions for legal risk connected with FX mortgage loans	1 503 209	77 346	1 425 862
Change of provisions due to FX rates differences	36 161	36 161	0
Balance at the end of the period	7 805 881	4 473 909	3 331 971

01.07.2025 – 30.09.2025	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	8 168 994	4 819 527	3 349 467
Utilization of provisions during the period	(886 725)	(507 221)	(379 504)
Costs of provisions for legal risk connected with FX mortgage loans	484 609	122 600	362 009
Change of provisions due to FX rates differences	39 003	39 003	0
Balance at the end of the period	7 805 881	4 473 909	3 331 971

01.01.2024 – 30.09.2024	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	7 871 789	6 516 460	1 355 329
Utilization of provisions during the period	(886 986)	(636 345)	(250 641)
Costs of provisions for legal risk connected with FX mortgage loans	1 656 390	71 473	1 584 917
Change of provisions due to FX rates differences	(217 793)	(217 793)	0
Balance at the end of the period	8 423 401	5 733 795	2 689 606

01.07.2023 - 30.09.2024	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	8 206 595	6 030 633	2 175 962
Utilization of provisions during the period	(386 242)	(261 835)	(124 407)
Costs of provisions for legal risk connected with FX mortgage loans	532 800	(105 251)	638 051
Change of provisions due to FX rates differences	70 247	70 247	0
Balance at the end of the period	8 423 401	5 733 795	2 689 606

## 11) CORPORATE INCOME TAX

In accordance with IAS 34, the tax burden for the first half of 2025 was calculated on the basis of the weighted average of the annual income tax rate (effective tax rate - ETR) that the Bank expects in the full financial year. If the estimated ETR changes, the amounts of the income tax burden will be adjusted in the next mid-year period of a given financial year.

The forecasted annual ETR used to calculate the income tax burden in the third quarter of 2025 was 28.99%, excluding the impact from the revaluation of deferred tax assets and liabilities resulting from the increase in the CIT rate for banks from 19 to 30% from 1 January 2026 adopted by the Sejm on 17 October 2025 (with a gradual reduction of the rate to 26 and 23% in 2027 and 2028). The revaluation of deferred tax assets and provisions will be carried out after the signing of the act by the President of the Republic of Poland. The positive financial impact on the net result from this revaluation will be significant.

The costs of legal risk related to CHF loans, bank tax and contributions to the Bank Guarantee Fund had the greatest impact on the amount of ETR in relation to the nominal income tax rate of 19%.

## 12) FINANCIAL ASSETS HELD FOR TRADING

### 12A. FINANCIAL ASSETS HELD FOR TRADING

	30.09.2025	31.12.2024
Debt securities	745 015	555 364
Issued by State Treasury	745 015	555 364
a) bills	2157	0
b) bonds	742 858	555 364
Equity instruments	177	115
Quoted on the active market	177	115
a) financial institutions	53	35
b) non-financial institutions	125	80
Positive valuation of derivatives	189 956	255 845
Repurchase agreement transactions	479 525	194 218
<b>Total</b>	<b>1 414 673</b>	<b>1 005 542</b>

### 12B. FINANCIAL ASSETS AND LIABILITIES HELD FOR TRADING - VALUATION OF DERIVATIVES, ADJUSTMENT FROM FAIR VALUE HEDGE AND SHORT POSITIONS AS AT:

	Fair Values 30.09.2025		Fair Values 31.12.2024	
	Assets	Liabilities	Assets	Liabilities
1. Interest rate derivatives	18 778	4 966	9 971	13 446
Forward Rate Agreements (FRA)	0	0	0	0
Interest rate swaps (IRS)	16 720	2 908	2 909	6 384
Other interest rate contracts: options	2 058	2 058	7 062	7 062
2. FX derivatives	50 465	135 138	63 350	26 867
FX contracts	3 077	9 936	2 061	16 983
FX swaps	42 679	121 565	59 128	8 906
Other FX contracts (CIRS)	4 709	3 637	2 161	978
FX options	0	0	0	0
3. Embedded instruments	0	120 134	0	181 662
Options embedded in deposits	0	120 134	0	181 662
Options embedded in securities issued	0	0	0	0
4. Indexes options	120 713	2 310	182 524	4 329
<b>Total</b>	<b>189 956</b>	<b>262 548</b>	<b>255 845</b>	<b>226 304</b>
Liabilities from short sale of debt securities	-	498 414	-	190 769

### 13) FINANCIAL ASSETS AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME

	30.09.2025	31.12.2024
<b>Debt securities</b>	39 830 968	29 218 737
Issued by State Treasury*	29 262 799	20 090 261
a) bills	2 548 562	0
b) bonds	26 714 237	20 090 261
Issued by Central Bank	10 288 212	8 692 224
a) bills	10 288 212	8 692 224
b) bonds	0	0
Other securities	279 957	436 252
a) listed	279 957	436 252
b) not listed	0	0
Shares and interests in other entities	36 857	36 712
<b>Total financial assets at fair value through other comprehensive income</b>	<b>39 867 825</b>	<b>29 255 449</b>

\* It also includes securities issued by the governments of other EU member states

### 14) LOANS AND ADVANCES TO CUSTOMERS

#### 14A. LOANS AND ADVANCES TO CUSTOMERS MANDATORILY AT FAIR VALUE THROUGH PROFIT OR LOSS

<b>Balance sheet value:</b>	30.09.2025	31.12.2024
Mandatorily at fair value through profit or loss	816	1 825
Companies	108	70
Individuals	708	1 755

#### 14B. LOANS AND ADVANCES TO CUSTOMERS VALUED AT AMORTISED COST

	Balance sheet value, gross			Accumulated impairment allowances			Balance sheet value, net
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	
Valued at amortised cost, as at 30.09.2025	67 631 016	6 387 322	3 222 027	(332 360)	(324 087)	(1 855 503)	74 728 415
Companies	17 333 130	2 407 340	870 329	(155 709)	(85 527)	(302 763)	20 066 800
Individuals	50 239 198	3 979 982	2 351 698	(176 473)	(238 560)	(1 552 740)	54 603 105
Public sector	58 688	0	0	(178)	0	0	58 510
Valued at amortised cost, as at 31.12.2024	67 807 545	6 230 694	3 438 697	(337 808)	(305 667)	(1 859 971)	74 973 490
Companies	16 079 105	1 473 418	937 199	(142 967)	(55 758)	(306 352)	17 984 645
Individuals	51 672 955	4 757 275	2 501 498	(194 544)	(249 909)	(1 553 619)	56 933 656
Public sector	55 485	1	0	(297)	0	0	55 189

The Bank writes down the gross carrying amount of a financial asset when there is no reasonable probability that it will be fully (total write-off) or partially (partial write-off) recovered. Following the recorded partial write-off the Bank provisioned (deducting the carrying value of gross receivables) penalty interest amounting to PLN 542 million as at 30.09.2025 (PLN 498 million as at 31.12.2024).

**14C. LOANS AND ADVANCES TO CUSTOMERS**

	30.09.2025		31.12.2024	
	Valued at amortised cost	Mandatorily at fair value through profit or loss	Valued at amortised cost	Mandatorily at fair value through profit or loss
Loans and advances	67 600 783	0	68 139 509	0
▪ to companies	13 107 043	0	11 190 253	0
▪ to private individuals	54 443 038	0	56 903 904	0
▪ to public sector	50 702	0	45 352	0
Receivables on account of payment cards	1 346 702	816	1 281 389	1 825
▪ due from companies	12 307	108	12 911	70
▪ due from private individuals	1 334 395	708	1 268 478	1 755
Purchased receivables	142 355	-	148 514	-
▪ from companies	142 355	-	148 514	-
▪ from public sector	0	-	0	-
Guarantees and sureties realised	0	-	321	-
Debt securities eligible for rediscount at Central Bank	0	-	0	-
Financial leasing receivables	7 289 649	-	7 095 187	-
Other	134 464	-	104 033	-
Interest	726 412	-	707 983	-
<b>Total:</b>	<b>77 240 365</b>	<b>816</b>	<b>77 476 936</b>	<b>1 825</b>
Impairment allowances	(2 511 950)	-	(2 503 446)	-
<b>Total balance sheet value:</b>	<b>74 728 415</b>	<b>816</b>	<b>74 973 490</b>	<b>1 825</b>

**14D. QUALITY OF LOANS AND ADVANCES TO CUSTOMERS PORTFOLIO VALUED AT AMORTISED COST**

	30.09.2025	31.12.2024
Loans and advances to customers (gross)	77 240 365	77 476 936
impaired	3 222 027	3 438 697
not impaired	74 018 338	74 038 239
Impairment write-offs	(2 511 950)	(2 503 446)
for impaired exposures	(1 855 503)	(1 859 971)
for not impaired exposures	(656 447)	(643 475)
<b>Loans and advances to customers (net)</b>	<b>74 728 415</b>	<b>74 973 490</b>

**14E. LOANS AND ADVANCES TO CUSTOMERS PORTFOLIO VALUED AT AMORTISED COST BY METHODOLOGY OF IMPAIRMENT ASSESSMENT**

	30.09.2025	31.12.2024
Loans and advances to customers (gross)	77 240 365	77 476 936
case by case analysis	522 199	642 481
collective analysis	76 718 166	76 834 455
Impairment allowances	(2 511 950)	(2 503 446)
on the basis of case by case analysis	(191 468)	(212 925)
on the basis of collective analysis	(2 320 482)	(2 290 521)
<b>Loans and advances to customers (net)</b>	<b>74 728 415</b>	<b>74 973 490</b>

**14F. LOANS AND ADVANCES TO CUSTOMERS PORTFOLIO VALUED AT AMORTISED COST BY KIND OF CUSTOMERS**

	30.09.2025	31.12.2024
Loans and advances to customers (gross)	77 240 365	77 476 936
corporate customers	20 669 487	18 545 209
individuals	56 570 878	58 931 727
Impairment allowances	(2 511 950)	(2 503 446)
for receivables from corporate customers	(544 177)	(505 374)
for receivables from private individuals	(1 967 773)	(1 998 072)
<b>Loans and advances to customers (net)</b>	<b>74 728 415</b>	<b>74 973 490</b>

**14G. MOVEMENTS IN IMPAIRMENT ALLOWANCES FOR LOANS AND ADVANCES TO CUSTOMERS CARRIED AT AMORTISED COST**

	01.01.2025 – 30.09.2025	01.01.2024 – 31.12.2024
Balance at the beginning of the period	2 503 446	2 496 554
Change in value of allowances:	8 504	6 892
Impairment allowances created in the period	1 070 057	1 566 924
Amounts written off	(86 304)	(247 871)
Impairment allowances released in the period	(827 553)	(1 123 163)
Sale of receivables	(180 369)	(255 131)
KOIM created in the period*	49 253	69 359
Changes resulting from FX rates differences	(261)	(5 662)
Other	(16 319)	2 436
<b>Balance at the end of the period</b>	<b>2 511 950</b>	<b>2 503 446</b>

\* In accordance with IFRS 9, the Group calculates interest on the loan portfolio with a recognized impairment based on the net exposure value. For this purpose, the so-called impaired interest adjustment ("KOIM") is calculated and recorded as a reduction of interest income. Aforementioned KOIM adjustment in the balance sheet is presented as an impairment allowances, and as a consequence the reconciliation of the change in impairment allowances requires consideration of the KOIM recognized in the interest income.



The Group records POCI assets in the balance sheet mainly as a result of recognition of impaired loans after the merger with Euro Bank and takeover of SKOK Piast. At the time of the merger, the aforementioned assets included in the Bank's books at fair value.

The value of POCI assets is as follows:

	Gross balance sheet value	Accumulated impairment	Net balance sheet value
<b>30.09.2025</b>			
- Companies	24 149	686	24 834
- Individuals	53 789	(38 917)	14 872
<b>31.12.2024</b>			
- Companies	12 566	(868)	11 698
- Individuals	69 669	(32 758)	36 911

#### 14H. LOANS AND ADVANCES TO CUSTOMERS PORTFOLIO VALUED AT AMORTISED COST BY CURRENCY

	30.09.2025	31.12.2024
in Polish currency	71 833 375	71 893 141
in foreign currencies (after conversion to PLN)	5 406 990	5 583 795
currency: USD	94 264	61 794
currency: EUR	4 525 469	4 137 732
currency: CHF	763 760	1 360 546
other currencies	23 497	23 723
<b>Total gross</b>	<b>77 240 365</b>	<b>77 476 936</b>

### 15) FINANCIAL ASSETS AT AMORTISED COST OTHER THAN LOANS AND ADVANCES TO CUSTOMERS

#### 15A. FINANCIAL ASSETS AT AMORTISED COST OTHER THAN LOANS AND ADVANCES TO CUSTOMERS

30.09.2025	Balance sheet value, gross			Accumulated impairment allowances			Balance sheet value, net
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	
Debt securities	27 176 309	0	0	(15)	0	0	27 176 294
Deposits, loans and advances to banks and other monetary institutions	499 268	0	0	(166)	0	0	499 102
Repurchase agreements	103 582	0	0	0	0	0	103 582

31.12.2024	Balance sheet value, gross			Accumulated impairment allowances			Balance sheet value, net
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	
Debt securities	24 381 493	0	0	(8)	0	0	24 381 485
Deposits, loans and advances to banks and other monetary institutions	434 535	0	0	(18)	0	0	434 517
Repurchase agreements	0	0	0	0	0	0	0

**15B. DEBT SECURITIES**

	30.09.2025	31.12.2024
credit institutions	1 907 526	2 305 192
other companies	0	0
public sector*	25 268 768	22 076 293
Total	27 176 294	24 381 485

\* also includes securities issued by governments of other EU countries

**15C. DEPOSITS, LOANS AND ADVANCES TO BANKS AND OTHER MONETARY INSTITUTIONS**

	30.09.2025	31.12.2024
Current accounts	204 895	278 629
Deposits	291 090	154 662
Other	0	0
Interest	3 283	1 244
Total (gross) deposits, loans and advances	499 268	434 535
Impairment allowances	(166)	(18)
<b>Total (net) deposits, loans and advances</b>	<b>499 102</b>	<b>434 517</b>

**15D. REPURCHASE AGREEMENTS**

	30.09.2025	31.12.2024
credit institutions	0	0
other customers	103 568	0
interest	14	0
Total	103 582	0

## 16) DERIVATIVES – HEDGE ACCOUNTING

### 16A. HEDGE RELATIONS

Detailed information on cash flow hedge relations applied by the Group, items designated as hedged and hedging and presentation of the result (active as at 30.09.2025) is shown in a tables below:

	<b>Hedge of volatility of the cash flows generated by PLN denominated financial assets</b>	<b>Fair value hedge of a fixed interest rate debt instrument</b>	<b>Cash flow volatility hedge due to future income and interest costs denominated in foreign currencies</b>
Description of hedge transactions	The Group hedges the risk of the volatility of cash flows generated by PLN denominated financial assets. The volatility of cash flows results from interest rate risk.	The Group hedges part of the interest rate risk associated with the change in the fair value of a fixed-rate debt instrument recorded in other comprehensive income, resulting from fluctuations in market interest rate.	The Group hedges the risk of the volatility of cash flows generated by income and interest costs denominated in foreign currencies. The volatility of cash flows results from the currency risk.
Hedged items	Cash flows resulting from PLN denominated financial assets.	A portfolio of fixed coupon debt securities classified as financial assets measured at fair value through other comprehensive income denominated in PLN.	Cash flows resulting from income and interest costs denominated in foreign currencies.
Hedging instruments	IRS transactions	IRS transactions	FX position resulting from recognized future leasing liabilities.
Presentation of the result on the hedged and hedging transactions	Effective part of the valuation of hedging instruments is recognised in revaluation reserve; interest on both: the hedged and the hedging instruments are recognised in net interest income. Ineffective part of the valuation of hedging instruments is recognized in the income statement as a result on hedge accounting.	The result on the change in the fair value measurement of hedged items in the hedged risk is referred to the result on hedge accounting. The remaining part of the change in fair value measurement is recognized in other comprehensive income. Interest on debt securities is recognized in net interest income. The change in fair value measurement of derivative instruments being a hedge is presented in the result on hedge accounting, and interest on these instruments is recognized in the interest result.	The effective part of the spot revaluation of hedging instruments is recognized in the revaluation reserve. The ineffective part of the valuation of the hedging item is recognized in the income statement as a result on hedge accounting

	Hedging the fair value of cash flows from issued fixed-rate liabilities denominated in foreign currencies	Hedging the fair value of the risk profile assigned to a portfolio of homogeneous, non-interest-bearing current accounts in PLN and separately foreign currencies (portfolio hedging)	Hedging the fair value of the risk profile assigned to portfolios of homogeneous, non-interest-bearing current accounts, separately in PLN and in foreign currencies (portfolio hedge) and fixed-rate debt instruments denominated in foreign currencies)
Description of hedge transactions	The Group hedges part of the interest rate risk related to changes in the fair value of cash flows from issued fixed-rate liabilities denominated in foreign currencies, resulting from the volatility of market interest rates.	The Group hedges part of the interest rate risk related to the change in the fair value of the risk profile assigned to the portfolios of homogeneous, non-interest-bearing current accounts in PLN and separately foreign currencies, resulting from the volatility of market interest rates.	The Group hedges part of the interest rate risk related to the change in the fair value of the risk profile assigned to the portfolios of homogeneous, non-interest-bearing current accounts, separately in PLN and in foreign currencies, and risk related to the change in the fair value of a fixed-rate debt instrument denominated in foreign currencies measured through other comprehensive income, resulting from the volatility of market interest rates.
Hedged items	Cash flows from issued fixed-rate liabilities denominated in foreign currencies	Risk profile assigned to a portfolios of homogeneous, non-interest-bearing current accounts in PLN and separately in foreign currencies.	Risk profile assigned to portfolios of homogeneous, non-interest-bearing current accounts, separately in PLN and foreign currencies, and a portfolio of fixed-coupon debt securities classified as financial assets valued at fair value through other comprehensive income denominated in foreign currencies.
Hedging instruments	IRS transactions	IRS transactions	CIRS transactions
Presentation of the result on the hedged and hedging transactions	The result from the change in the fair value measurement of flows from hedged items in terms of the hedged risk is recognized in the result from hedge accounting. Interest on debt securities is recognized in interest income. The change in the fair value measurement of derivative instruments constituting hedging is presented in the result from hedge accounting, and interest on these instruments is recognized in net interest income.	The result from the change in fair value measurement determined for hedged items in terms of the hedged risk is recognized in the result from hedge accounting. The change in the fair value measurement of derivative instruments constituting security is presented in the result from hedge accounting, and interest on these instruments is recognized in net interest income.	The result of the change in fair value measurement designated for hedged items to the extent of the hedged risk is recorded in the result on hedge accounting. The remaining part of the change in fair value measurement of the debt instrument is recorded in other comprehensive income. The change in fair value measurement of derivative instruments constituting the hedge is presented in the result on hedge accounting, and interest on these instruments is recorded in the interest result.

**16B. HEDGE ACCOUNTING - BALANCE SHEET VALUATION**

	Fair values 30.09.2025			Fair values 31.12.2024		
	Total	Assets	Liabilities	Total	Assets	Liabilities
1. Derivative instruments constituting cash flow hedges related to interest rate and/or exchange rate						
CIRS contracts	0	0	0	(100 751)	0	100 751
IRS contracts	0	0	0	(788)	0	788
FXS contracts	0	0	0	0	0	0
2. Derivatives used as interest rate hedges related to interest rates						
IRS contracts	(26 728)	0	26 728	0	0	0
3. Total hedging derivatives	(26 728)	0	26 728	(101 539)	0	101 539

**17) LIABILITIES TO BANKS AND OTHER MONETARY INSTITUTIONS**

	30.09.2025	31.12.2024
In current account	33 160	31 840
Term deposits	158 451	172 057
Loans and advances received	0	0
Interest	1 393	562
<b>Total</b>	<b>193 004</b>	<b>204 459</b>

**18) LIABILITIES TO CUSTOMERS**

	30.09.2025	31.12.2024
Amounts due to private individuals	94 177 873	87 566 756
Balances on current accounts	63 481 591	57 540 848
Term deposits	30 140 338	29 463 221
Other	335 413	293 855
Accrued interest	220 531	268 832
Amounts due to companies	26 425 733	24 967 949
Balances on current accounts	14 294 040	14 896 746
Term deposits	11 765 308	9 725 173
Other	327 883	301 393
Accrued interest	38 502	44 637
Amounts due to public sector	7 581 940	4 722 508
Balances on current accounts	5 551 038	4 281 851
Term deposits	2 018 601	434 813
Other	4 104	1 683
Accrued interest	8 197	4 161
<b>Total</b>	<b>128 185 546</b>	<b>117 257 213</b>

**19) LIABILITIES FROM SECURITIES SOLD WITH BUY-BACK CLAUSE**

	30.09.2025	31.12.2024
to banks and other credit institutions	133 039	194 162
to customers	0	0
interest	18	61
<b>Total</b>	<b>133 057</b>	<b>194 223</b>

**20) CHANGE OF DEBT SECURITIES**

	01.01.2025 – 30.09.2025	01.01.2024 – 31.12.2024
Balance at the beginning of the period	6 124 775	3 317 849
Increases, on account of:	1 222 616	3 368 571
issue of bonds by the Bank	0	2 131 700
issue of covered bonds by Millennium Bank Hipoteczny	800 000	800 000
issue of Millennium Leasing bonds	0	0
valuation of the Bank's bonds designated to fair value hedged relationship	0	3 159
interest accrual	422 616	433 712
Reductions, on account of:	(583 245)	(561 645)
change in the valuation of the Bank's bonds designated to fair value hedged relationship	(18 006)	0
redemption of the Bank's bonds	(26 000)	(128 731)
redemption of the Millennium Leasing bonds	(30 000)	0
other changes in carrying amount - (including exchange rate differences)	(3 623)	(34 240)
interest payment	(505 616)	(398 674)
<b>Balance at the end of the period</b>	<b>6 764 146</b>	<b>6 124 775</b>

**21) CHANGE OF SUBORDINATED DEBT**

	01.01.2025 – 30.09.2025	01.01.2024 – 31.12.2024
Balance at the beginning of the period	1 562 330	1 565 045
Increases, on account of:	89 533	125 557
interest accrual	89 533	125 557
Reductions, on account of:	(95 767)	(128 272)
interest payment	(95 767)	(128 272)
<b>Balance at the end of the period</b>	<b>1 556 096</b>	<b>1 562 330</b>

During 2025 and 2024 the Group did not have any delays in the payment of principal and interest instalments, nor did it infringe any contractual provisions resulting from its subordinated liabilities.

## 22) PROVISIONS

### 22A. PROVISIONS

	30.09.2025	31.12.2024
Provision for commitments and guarantees given	93 131	53 583
Provision for legal issues	3 452 797	2 847 003
Retirement benefits	54 392	51 166
<b>Total</b>	<b>3 600 320</b>	<b>2 951 752</b>

### 22B. CHANGE OF PROVISION FOR COMMITMENTS AND GUARANTEES GIVEN

01.01.2025 – 30.09.2025	Total	Stage 1	Stage 2	Stage 3
Balance at the beginning of the period	53 583	30 305	16 613	6 665
Charge of provision	88 550	39 500	40 698	8 352
Release of provision	(48 908)	(36 974)	(7 930)	(4 004)
Movement between stages	0	13 461	(12 763)	(698)
FX rates differences	(94)	(3)	(7)	(84)
<b>Balance at the end of the period</b>	<b>93 131</b>	<b>46 289</b>	<b>36 611</b>	<b>10 231</b>

01.01.2024 – 31.12.2024	Total	Stage 1	Stage 2	Stage 3
Balance at the beginning of the period	42 367	21 612	10 127	10 628
Charge of provision	52 289	21 030	26 166	5 093
Release of provision	(40 993)	(27 432)	(5 749)	(7 812)
Movement between stages	0	15 180	(13 933)	(1 247)
FX rates differences	(80)	(85)	2	3
<b>Balance at the end of the period</b>	<b>53 583</b>	<b>30 305</b>	<b>16 613</b>	<b>6 665</b>

### 22C. CHANGE OF PROVISION FOR LEGAL ISSUES

	01.01.2025 – 30.09.2025	01.01.2024 – 31.12.2024
Balance at the beginning of the period	2 847 003	1 403 105
Creation of provisions for legal risk connected with FX mortgage loans *	1 425 862	1 857 142
Charge of provision for other legal issues	92 664	13 553
Release of provision	(10 310)	(9 186)
Utilisation of provision	(904 602)	(420 111)
Reclassification	2 180	2 500
<b>Balance at the end of the period</b>	<b>3 452 797</b>	<b>2 847 003</b>

\* Creation of provisions for legal risk related to foreign currency mortgage loans is described in more detail in **Chapter 10 Legal risk related to foreign currency mortgage loans.**

## 22D. CHANGE OF PROVISION FOR RETIREMENT BENEFITS

	01.01.2025 – 30.09.2025	01.01.2024 - 31.12.2024
Balance at the beginning of the period	51 166	48 328
Charge/Release of provision	4 565	6 227
Utilization of provisions	(1 339)	(1 456)
Actuarial gains/losses	0	(1 928)
Inne	0	(5)
Balance at the end of the period	54 392	51 166



## 5. RISK MANAGEMENT

Risk management performs a key role in the strategy of balanced and sustainable development of the Group, supporting optimization of relationships between risk and returns within various business lines and maintenance of adequate risk profile relative to capital and liquidity.

To ensure effective risk management and coherent policy the Group has implemented risk management model under which credit, market, liquidity, operational risks, and capital requirements are managed in an integrated manner.

### 5.1. CREDIT RISK

In the third quarter of 2025 the Bank Millennium Group, both in the corporate and retail segments, focused on introducing changes to the lending policy aimed at ensuring the appropriate quality of the portfolio in the new, demanding economic environment.

In the area of credit risk, the Group has focused on adapting regulations, credit processes and monitoring to changed conditions.

In the retail segment, in line with its current strategy, the Group focused primarily on developing small businesses. The concept of identifying a new customer segment and adapting lending processes to its specific needs was further developed. In the area of personal loans and mortgages, development efforts continued to optimize and digitalize the process, while simultaneously adapting it to the evolving market situation and regulatory environment.

In the corporate segment, the Group continued to be focused on optimal use of capital while maintaining the current profitability and maintaining a good risk profile. The Group also carried out activities aimed at streamlining and accelerating credit processes, including decision-making processes. As in previous periods, work continued on improving IT tools supporting the credit process. A comprehensive project is being developed in order to enable a stronger presence of the Bank in the corporate segment. The Group also continued close monitoring of the loan portfolio, as well as individual monitoring of the largest exposures.

The Group assesses credit risk regardless of the method of classifying the portfolio of receivables from customers in the financial statements as a portfolio measured at amortized cost or a portfolio measured at fair value through profit or loss.

The table below contains data on the entire portfolio of receivables from customers broken down into regular and past due exposures.

Changes in the loan portfolio of the Group after 9 months of 2025 are summarized below:

	30.09.2025		31.12.2024	
	Loans and advances to customers	Loans and advances to banks	Loans and advances to customers	Loans and advances to banks
Not overdue and without impairment	72 589 005	499 268	72 521 213	434 534
Overdue*, but without impairment	1 430 071	0	1 524 695	0
Total without impairment	74 019 076	499 268	74 045 908	434 534
With impairment	3 228 220	0	3 449 694	0
<b>Total</b>	<b>77 247 296</b>	<b>499 268</b>	<b>77 495 601</b>	<b>434 534</b>
Impairment write-offs	(2 511 951)	(166)	(2 503 446)	(18)
Fair value adjustment**	(6 114)	0	(10 940)	0
<b>Total, net</b>	<b>74 729 231</b>	<b>499 102</b>	<b>74 981 215</b>	<b>434 517</b>
Loans with impairment / total loans	4.18%	0.00%	4.45%	0.00%

(\*) Loans overdue not more than 4 days are treated as technical and are not shown in this category.

(\*\*) Fair value adjustment is defined as the difference between the nominal value and the fair value of the portfolio measured at fair value through profit or loss. The fair value adjustment is influenced by considering the credit risk of the portfolio.

## 5.2. MARKET RISK

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 (10-days holding period) and with specified probability (99% confidence level) from an adverse market movement. The market risk measurement, monitoring and reporting is conducted daily.

The market risk limits are revised at least once a year and to consider, inter alia, the change of the consolidated Own Funds, current and projected balance sheet structure as well as the market environment. The market risk limits valid in 3Q 2025 reflected the assumptions and risk appetite defined under Risk Strategy 2025 - 2028. The current limits in place have been valid since 30<sup>th</sup> September 2024. All excesses of market risk limits are always reported, documented, and ratified at the proper competence level. In the 3Q 2025, no excesses of the market risk limits were recorded.

Open positions mostly included interest rate and FX risk instruments. According to the Risk Strategy approved in the Group, the FX open position is allowed, however should be kept at low levels. For this purpose, the Group has introduced a system of limits for FX open positions (both Intraday and Overnight limits) and allows keeping FX open positions only in Trading Book. In the 3Q 2025, the FX Total open position (Intraday as well as Overnight) remained below internal limits in place.

In 3Q 2025, the VaR remained on average at the level of approx. PLN203.9 million for the total Group, which is jointly Trading Book and Banking Book (35% of the limit) and at approx. PLN3.6 million for Trading Book (17% of the limit). The exposure to market risk at the end of September 2025 was approx. PLN245.6 million for Global Bank (43% of the limit) and approx. PLN4.6 million for Trading Book (22% of the limit). It should be noted that the value at risk in Banking Book is only complementary risk measurement tool as most of positions are expected to be held to maturity and are in large majority not a subject to marked to market (see next section - Interest rate risk in Banking Book, IRRBB).

The market risk exposure in 3Q 2025 in terms of value at risk for Trading Book, together with risk type division, is presented in the table below (PLN thousands).

VaR measures for market risk in Trading Book ('000 PLN)

	30.09.2025		VaR (3Q2025)			31.12.2024	
	Exposure	Limit usage	Average	Maximum	Minimum	Exposure	Limit usage
<b>Total risk</b>	4 636	22%	3 605	4 898	2 457	784	4%
Generic risk	4 634	n.a.	3 603	4 896	2 455	780	n.a.
Interest Rate VaR	4 629	28%	3 597	4 903	2 453	780	5%
FX Risk	22	1%	68	830	15	44	1%
Equity Risk	13	13%	9	16	4	13	13%
Diversification Effect	0.6%					7.3%	
Specific risk	3	0%	2	4	2	4	0%

In addition to above mention market risk limits, the stop loss limits are introduced for the financial markets' portfolios. The aim is to limit the maximum losses of the trading activity of the Group. In case of the limit is reached, a review of the management strategy and assumptions for the positions in question must be undertaken. Stop loss limits were not reached.

### 5.3. INTEREST RATE RISK IN BANKING BOOK (IRRBB)

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 balance sheet, arising from adverse movements in interest rates that affect interest rate sensitive positions. The risk includes repricing gap risk, basis risk, Client's option risk and credit spread risk (CSRBB).

The framework of market risk and interest rate risk management and its controls 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 variations in market interest rates have an influence on the Group's net interest income, both under a short and medium-term perspective, at the same time affecting economic value of net equity in the long term. The measurement of both is complementary in understanding the complete scope of interest rate risk in Banking Book. For this reason, apart from daily market risk measurement in terms of value at risk, the scope of the additional measurement of interest rate risk covers both earnings-based and economic value measures and their forecasts considering expected balance-sheet development, investment, and hedging strategy. Results of measurement are reported monthly:

- The impact on net interest income (NII) over a time horizon of next 12 months resulting from one-off, parallel interest rate shock of 100 basis points and the supervisory outlier test (SOT NII) with a set of two interest rate risk stress scenarios.
- The impact on the economic value of equity (EVE) resulting from 100 bps parallel upward/downward yield curve movements as well as from supervisory outlier test (SOT EVE) with set of six interest rate risk stress scenarios.
- The interest rate sensitivity in terms of BPVx100, that is the change of the portfolio's value caused by a parallel shift of the yield curve by 1 basis point multiplied by 100.

The interest rate risk measurement is carried out across all the risk management areas in the Bank, with the particular attention on Banking Book.

The results of the above-mentioned analysis for net interest income (NII), BPVx100 and economic value measures are regularly monitored and reported to the Capital, Assets and Liabilities Committee, to Risk Committee, the Management Board and Supervisory Board.

The exposure to interest rate risk in the Banking Book is primarily generated by the differences in frequency and repricing dates of the assets and liabilities, as well as contractually used reference indexes or sensitivity of client rate to market rates. It is specifically affected by the imbalance between assets and liabilities that have fixed rate and specificity products with floating rate, in particular by:

- The liabilities – for those, whose sensitivity (i.e. pass-through rate) is reduced, as the interest rate offered to Client cannot be lower than zero, therefore rate cuts result in smaller scope for reduction of the respective cost.
- The assets - for variable-rate loans the transfer of market rate movements is proportional and automatic at next repricing. On top of that due to specificity of the polish legal system, the interest rate of credits is capped (it cannot exceed two times Reference Rate of the National Bank of Poland increased by 7 percentage points). In case of some consumer- or fixed-rate loans and decreasing interest rates, the impact on Net Interest Income can be negative and can exceed the nominal rate cuts due to the multiplier effects.

Consequently, sensitivity of the NII to interest rate changes is influenced by the absolute level of interest rates taken as a reference, in particular it increases when market rates are low due to margin compression. Therefore, assumptions regarding the timing and magnitude of deposits repricing and automatic activation of loan rate caps in response to market rate movements are especially important when assessing the interest rate sensitivity and risk.

Regarding the interest rate risk in Banking Book, the following principles are in place:

- The market risk that results from the commercial banking activity transferred on the monthly basis to areas that actively manage market risk and that are measured in terms of risk and profit and loss,
- The Bank uses natural hedging between loans and deposits, complemented by fixed and floating rate bonds and derivatives to manage interest rate risk with the main purpose of protecting the net interest income, while reducing the variability of market value of the portfolios recognised through Profit and Loss or Other Comprehensive Income (OCI).

Although, a simultaneous maintenance of supervisory limit for the SOT NII and SOT EVE metrics remains a key challenge for the Group, as well as for the entire banking sector, the results for outlier stress test scenarios (SOT) as of September 2025 show that even under the most severe outlier stress test scenario, the decline of both EVE and NII for Banking Book is below supervisory limit of i.e. below 15% of Tier 1 and 5% of Tier 1, respectively.

In case of internal metrics for net interest income's sensitivity, which is results under a scenario of parallel shift of interest rates by 100 basis points over a 12-month horizon after 30 September 2025 is presented in the table below (the worst scenario for all currencies - decrease of interest rates). The results remained within internal limits in place.

Sensitivity of NII for position in Polish Zloty:

<b>- 100 bps change of interest rates</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
PLN million	-64	4
% of last 12 months	-1.09%	0.08%

Sensitivity of NII for position in significant currencies:

<b>- 100 bps change of interest rates</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
PLN million	-100	-27
% of last 12 months	-1.71%	-0.49%

The above results of internal metrics for sensitivity of NII for the next 12 months after 30<sup>th</sup> September 2025 in Polish Zloty in Banking Book are conducted 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 if all assets and liabilities with variable interest rate already reflect market interest rates levels as of 30<sup>th</sup> September 2025 (for example, the NBP Reference rate was set to 4.75%, i.e. reflecting a cumulative cut of 100 bps in 2025, of which 50 bps in 3Q 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 30<sup>th</sup> September 2025 and is set at the repricing date of the assets and liabilities that happens during the 12 following months,

Apart from reference date for the analysis that is set in the context of a lower interest rate environment in Poland (decision of the Monetary Policy Council to cut interest rates in 2025), the increase of the NII sensitivity metric observed in September 2025 compared to the one published for the end of 2024 is primarily due to a revision of methodology for non-maturity products. As part of this process, the sensitivity of non-maturing deposits (NMD) to interest rate cuts specifically was reassessed resulting in a more limited scope of adjustment in case of interest rate cut shocks. It means that smaller part of the decrease in interest rate shock is expected to be reflected in lowering of the cost of funding. This adjustment for NMD was applied only for internal NII measures (+/- 100 bps shock) and aims to provide a more conservative representation of interest rate risk in the banking book, in line with Bank's pricing policy as well as prevailing market practices.

## 5.4. 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 3Q 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 3Q 2025, the Group maintained Loan-to-Deposit ratio well below 100%. This ratio was equalled 58% at the end of September 2025 (64% at the 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 September 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. PLN67.2 billion (44% of total assets), whereas at the end of December 2024 was at the level of approx. PLN53.9 billion (39% of total assets).

<b>Main liquidity ratios</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
Loans/Deposits ratio (%)	58%	64%
Liquid assets portfolio (PLN million)*	67 405	53 646
Liquidity Coverage requirement, LCR (%)	374%	371%

(\*) *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).*

Total Clients' deposits of the Group reached the level of PLN128.2 billion (PLN117.3 billion at the end of December 2024). The share of funds from individuals in total Client's deposits equalled to approx. 73.5% at the end of September 2025 (74.7% at the end of December 2024). The maintenance of high share of funds from individuals had a positive impact on the Group's liquidity and supported the safe compliance of the supervisory measures.

The main source of financing of the Group remains its deposits base, with a large, diversified, and stable funding from retail, corporate and public sectors. The source of medium-term funding included mainly subordinated debt, own EUR bonds issue and covered bonds issued by Millennium Mortgage Bank.

The level of deposit concentration is regularly monitored and did not have any negative impact on the stability of the deposit base in 3Q 2025. However, in case of significant increase of the share of the largest depositors, the additional funds from the depositors are not treated as stable. Despite of that, to prevent deposit base fluctuations, the Group maintains the reserves of liquid assets in the form of securities portfolio as described above.

The Group carried out ongoing monitoring and reporting of key supervisory liquidity indicators, including daily calculation of Liquidity Coverage Requirement (LCR) and monthly of Net Stable Funding Requirement (NSFR). In 3Q 2025, the regulatory minimum of 100% for both LCR and NSFR was fulfilled by the Group. The LCR stayed at 374% at the end of September 2025 (371% at the end of December 2024). The liquidity position was kept due to increase of the retail Clients' deposits that guaranteed safe level of liquid assets portfolio. The NSFR was kept above supervisory minimum of 100% in each of the reporting month.

In accordance with the Recommendation of the Polish Financial Supervision Authority (KNF) on the Long-Term Funding Ratio (LTFR or WFD), the Group monitors and reports this indicator on a regular basis as part of its internal liquidity risk management framework. The Group acknowledges the supervisory expectation to reach a minimum for LTFR of 40% by December 2026. Although supervisory threshold is not yet binding, the Group actively monitors long-term market funding opportunities and takes proactive measures to align its funding structure with the expected requirement. The LTFR has been gradually increasing, and fluctuated around 33% in 3Q2025 (28% at the end of December 2024).

Additionally, the Group employs an internal structural liquidity analysis based on cumulative liquidity gaps calculated on an actuarial basis (i.e., assuming a certain probability of cash flow occurrence). In 3Q 2025 the internally defined limit of 12% total assets was not breached, and the liquidity position was confirmed as solid.

Stress tests as regards structural liquidity are conducted at least quarterly to understand the Group's liquidity risk profile, to make sure that the Group can meet its commitments in the event of a liquidity crisis and to contribute to preparing a contingency plan regarding liquidity and management decisions.

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 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 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.

## 5.5. OPERATIONAL RISK

In the third quarter of 2025 there could be observed a continuous use of standards implemented for the purpose of management of operational risk, which are in line with legal provisions in force and the best practice of national and international financial institutions.

The operational risk management model, implemented by the Group is reviewed and accepted on a regular basis by the Management Board.

In keeping with the adopted solution, risk management is a process of continuous improvement as regards identification, assessment, monitoring, control/mitigating, and reporting by complementary activities, which effectively translates into a real reduction in the level of operational risk in the business tasks.

In the third quarter of 2025 the registered level of operational risk losses was within the limit.

## 5.6. CAPITAL MANAGEMENT

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, the Group/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 macroeconomic conditions.

The Bank and the Group are obliged by law to meet minimum own funds and leverage ratio requirements, set in art. 92 of the Regulation (EU) 575/2013 of the European Parliament and of the



Council on prudential requirements for credit institutions as amended and amending Regulation (EU) No 648/2012 (CRR II). At the same time, the following levels, recommendations, and buffers were included in capital limits/targets setting:

- Pillar II FX mortgage loans buffer (P2R buffer) - KNF decisions from January and February 2025 setting that buffer at 0.0%;
- 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 KNF each year,
  - Systemic risk buffer at the level of 0%, reduced from 3% in March 2020,
  - Countercyclical buffer at 1% in force from the 25<sup>th</sup> of September 2025, and it will be elevated to 2% from the 25<sup>th</sup> of September 2026.

In December 2024, the Bank received the letter from PFSA informing on non-imposing an additional capital charge ("P2G").

Capital adequacy of the Group was as follows (PLN mn, %):

<b>Capital adequacy</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
Risk-weighted assets	53 489.46	45 116.23
Own Funds requirements, including:	4 279.16	3 609.30
- Credit risk and counterparty credit risk	3 243.30	3 086.63
- Market risk	37.68	19.81
- Operational risk	979.42	500.38
- Credit Valuation Adjustment CVA	18.75	2.47
Own Funds, including:	8 542.91	7 776.35
Common Equity Tier 1 Capital	7 683.66	6 688.43
Tier 2 Capital	859.25	1 087.93
<b>Total Capital Ratio (TCR)</b>	<b>15.97%</b>	<b>17.24%</b>
<b>Tier 1 Capital ratio (T1)</b>	<b>14.36%</b>	<b>14.82%</b>
<b>Common Equity Tier 1 Capital ratio (CET1)</b>	<b>14.36%</b>	<b>14.82%</b>
<b>Leverage ratio</b>	<b>5.01%</b>	<b>4.64%</b>



Capital adequacy showed as surpluses/deficits on required or recommended levels is presented in the below table.

<b>Capital adequacy</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
<b>Total Capital ratio (TCR)</b>	<b>15.97%</b>	<b>17.24%</b>
Minimum required level (OCR)	11.75%	12.21%
Surplus(+) / Deficit(-) of TCR capital adequacy (p.p.)	4.22%	5.03%
Minimum recommended level TCR (OCR+P2G)	11.75%	13.81%
Surplus(+) / Deficit(-) on recommended level (p.p.)	4.22%	3.43%
<b>Tier 1 Capital Ratio (T1)</b>	<b>14.36%</b>	<b>14.82%</b>
Minimum required level (OCR)	9.75%	9.85%
Surplus(+) / Deficit(-) of T1 capital adequacy (p.p.)	4.61%	4.97%
Minimum recommended level (OCR+P2G)	9.75%	11.45%
Surplus(+) / Deficit(-) on recommended level (p.p.)	4.61%	3.37%
<b>Common Equity Tier 1 Capital Ratio (CET1)</b>	<b>14.36%</b>	<b>14.82%</b>
Minimum required level (OCR)	8.25%	8.07%
Surplus(+) / Deficit(-) of CET1 capital adequacy (p.p.)	6.11%	6.75%
Minimum recommended level (OCR+P2G)	8.25%	9.67%
Surplus(+) / Deficit(-) on recommended level (p.p.)	6.11%	5.15%
<b>Leverage ratio</b>	<b>5.01%</b>	<b>4.64%</b>
Minimum required level	3.00%	3.00%
Surplus(+) / deficit (-) on leverage ratio (p.p.)	2.01%	1.64%

In Q3 2025, capital ratios increased – the Tier 1 capital ratio (equal to the Common Equity Tier 1 capital ratio) by 62 basis points, and the total capital ratio by 39 basis points. Tier 1 capital (CET1) increased by PLN 657 million (9.3%), mainly as a result of the inclusion of the net financial result for the first half of 2025 (PLN 511 million). Own funds increased by PLN 580 million (7.3%), with Tier 2 capital decreasing by PLN 77 million, which is related to the shortened maturity of issued subordinated bonds. Capital requirements increased by 4.7% (PLN 191 million), with credit risk requirements increasing by PLN 193 million (6.3%), primarily due to portfolio growth. Changes in other capital requirement categories were not significant.

The leverage ratio increased by 36 basis points in Q3 2025 (5.01% vs. 4.65%). The excess over the regulatory minimum of 3% is 201 basis points.

The minimum capital ratios required by the Polish Financial Supervision Authority (KNF) for the combined buffer requirement (OCR) plus the additional P2G surcharge are being met with a surplus at the end of Q3 2025.

### 5.6.1 MINIMUM REQUIREMENTS FOR OWN FUNDS AND LIABILITIES SUBJECT TO WRITE DOWN OR CONVERSION (MREL)

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

In terms of the MRELTrea and MRELtem requirements, the Group presents a surplus compared to the minimum required levels as of September 30, 2025, and also meets the MRELTrea Requirement after the inclusion of the Combined Buffer Requirement.

MREL	30.09.2025	31.12.2024
<b>MRELTrea ratio</b>	<b>25.51%</b>	<b>28.06%</b>
Minimum required level MRELTrea	15.36%	18.03%
Surplus(+) / Deficit(-) of MRELTrea (pp)	10.15pp	10.03pp
Minimum required level including Combined Buffer Requirement (CBR)	19.11%	20.78%
Surplus(+) / Deficit(-) of MRELTrea+CBR (pp)	6.40pp	7.28pp
<b>MRELtem ratio</b>	<b>8.83%</b>	<b>8.71%</b>
Minimum required level of MRELtem	5.91%	5.91%
Surplus(+) / Deficit(-) of MRELtem (pp)	2.92pp	2.80pp

In May 2025, the Bank received a letter from the Bank Guarantee Fund regarding the joint decision of the Single Resolution Board (SRB) and the BFG obliging the Bank to meet the communicated MRELTrea requirements in the amount of 15.36% (previously 18.03% in the decision received June 2023) and 14.15% taking into account the subordination criterion and MRELtem requirements in the amount of 5.91% (as in the decision received in 2024) and 5.54% taking into account the subordination criterion.

## **6. OPERATIONAL SEGMENTS**

Information about operating segments has been prepared based on the reporting structure which is used by the Management Board of the Bank for evaluating the results and managing resources of operating segments. Group does not apply additional breakdown of activity by geographical areas because of the insignificant scale of operations performed outside the Poland, in result such complementary division is not presented.

The Group's activity is pursued on the basis of diverse business lines, which offer specific products and services targeted at the market segments listed below:

### **Retail Customer Segment**

The Retail Customers Segment covers activity targeted at mass-market Customers, affluent Customers, small companies and individual entrepreneurs.

The activity of the above business lines is developed with use of the full offer of banking products and services as well as sales of specialised products offered by subsidiaries in the Group. In the credit products area the key products are mortgage loans, retail credit products, credit card revolving credit as well as leasing products for small companies. Meanwhile key Customers funds include: current and saving accounts, term deposits, mutual funds and structured products. Additionally the offer comprises insurance products, mainly linked with loans and credit cards, as well as specialised savings products. The product offer for affluent customers was enriched to include selected mutual funds of other financial intermediaries and foreign funds.

### **Corporate Customer Segment**

The Corporate Customers Segment is based on activity targeted at Small and Medium sized Companies as well as Large Corporations. The offer is also addressed to Customers from the Public Sector. As part of the Bank's new strategy for 2025-2028, this segment also includes companies other than sole proprietorships, previously serviced in the Retail Segment as small entrepreneurs.

Business in the Corporate Customers segment is pursued with use of an offer of typical banking products (loans for day-to-day activity, investment loans, current accounts, term deposits) supplemented by a range of cash management products as well as treasury products (including derivatives) and leasing and factoring services.

### **Treasury, ALM (assets and liabilities management) and Other**

This segment covers the Group's activity as regards investments by the Treasury Department, brokerage, inter-bank market transactions and taking positions in debt securities, which are not assigned to other segments.

This segment includes other assets and other liabilities, assets and liabilities connected with hedging derivatives, liabilities connected with external funding of the Group and deferred income tax assets not assigned to any of the segments.

For each segment the pre-tax profit is determined, comprising:

- Net interest income calculated on the basis of interest on external working assets and liabilities of the segment as well as allocated assets and liabilities generating internal interest income or cost. Internal income and costs are calculated based on market interest rates with internal valuation model applied;
- Net commission income;
- Other income from financial transactions and FX gains, such as: dividend income, result on investment and trading activity, FX gains/losses and result on other financial instruments;
- Other operating income and expenses;
- Costs on account of impairment of financial and non-financial assets;
- Segment share in operating costs, including personnel and administration costs;
- Segment share in depreciation costs;
- Operating profit calculated as a measure of segment profit differs from the IFRS financial result before tax due to: share in net profits of associates and charge of bank tax. These items and the income tax burden were presented only at the Group level.

The assets and liabilities of commercial segments are the operating assets and liabilities used by the segment in its operations, allocated on business grounds. The difference between operating assets and liabilities is covered by money market assets/liabilities and debt securities. The assets and liabilities of the Treasury, ALM & Other segment are money market assets/liabilities and debt securities not allocated to commercial 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. New 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. Following P&L categories are presented as part of financial performance of new 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 FX mortgage portfolio legal risk including provisions for legal risk and other costs, 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. 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).

## Income statement 1.01.2025 – 30.09.2025

<i>In '000 PLN</i>	<b>Retail Banking</b>	<b>Corporate Banking</b>	<b>Treasury. ALM &amp; Other</b>	<b>FX mortgage</b>	<b>TOTAL</b>
Net interest income	3 519 929	617 143	183 152	(2 709)	4 317 515
Net fee and commission income	417 849	151 370	3 024	2 735	574 978
Dividends, other income from financial operations and foreign exchange profit	71 483	81 079	32 468	3 402	188 432
Result on non-trading financial assets mandatorily at fair value through profit or loss	451	0	54 472	0	54 923
Other operating income and cost	(16 983)	5 041	(41 581)	83 613	30 090
Operating income	3 992 729	854 633	231 535	87 041	5 165 938
Staff costs	(787 707)	(194 012)	(25 890)	0	(1 007 609)
Administrative costs, including:	(462 685)	(80 160)	(103 837)	(75 800)	(722 482)
- BGF costs	(53 562)	(1 329)	(76 007)	0	(130 898)
Depreciation and amortization	(141 662)	(22 122)	(3 127)	0	(166 911)
Operating expenses	(1 392 054)	(296 294)	(132 854)	(75 800)	(1 897 002)
Impairment losses on assets	(89 635)	(94 285)	(12 103)	4 781	(191 242)
Results on modification	(13)	(2 728)	0	0	(2 741)
Costs of legal risk connected with FX mortgage loans	0	0	0	(1 569 996)	(1 569 996)
<b>Total operating result</b>	<b>2 511 027</b>	<b>461 326</b>	<b>86 578</b>	<b>(1 553 974)</b>	<b>1 504 957</b>
Share in net profit of associated companies					0
Banking tax					(300 612)
<b>Profit / (loss) before income tax</b>					<b>1 204 345</b>
Income taxes					(349 093)
<b>Profit / (loss) after taxes</b>					<b>855 252</b>

## Income statement 1.07.2025 – 30.09.2025

<i>In '000 PLN</i>	<b>Retail Banking</b>	<b>Corporate Banking</b>	<b>Treasury. ALM &amp; Other</b>	<b>FX mortgage</b>	<b>TOTAL</b>
Net interest income	1 112 491	203 168	129 813	245	1 445 717
Net fee and commission income	152 916	50 124	529	775	204 344
Dividends, other income from financial operations and foreign exchange profit	22 076	25 433	16 504	780	64 793
Result on non-trading financial assets mandatorily at fair value through profit or loss	255	0	(13)	0	242
Other operating income and cost	(3 400)	2 000	(33 196)	69 169	34 573
Operating income	1 284 338	280 725	113 637	70 969	1 749 669
Staff costs	(263 863)	(66 253)	(8 866)	0	(338 982)
Administrative costs, including:	(176 315)	(27 295)	(9 820)	(19 306)	(232 736)
- BGF costs	(17 834)	(443)	0	0	(18 277)
Depreciation and amortization	(46 906)	(7 404)	(1 047)	0	(55 357)
Operating expenses	(487 084)	(100 952)	(19 733)	(19 306)	(627 075)
Impairment losses on assets	(67 059)	(37 309)	(10 353)	1 657	(113 064)
Results on modification	3	(512)	0	0	(509)
Costs of legal risk connected with FX mortgage loans	0	0	0	(484 609)	(484 609)
<b>Total operating result</b>	<b>730 198</b>	<b>141 952</b>	<b>83 551</b>	<b>(431 289)</b>	<b>524 412</b>
Share in net profit of associated companies					0
Banking tax					(100 794)
<b>Profit / (loss) before income tax</b>					<b>423 618</b>
Income taxes					(79 112)
<b>Profit / (loss) after taxes</b>					<b>344 506</b>

## Balance sheet items as at 30.09.2025

<i>In '000 PLN</i>	<b>Retail Banking</b>	<b>Corporate Banking</b>	<b>Treasury. ALM &amp; Other</b>	<b>FX mortgage</b>	<b>TOTAL</b>
Loans and advances to customers	58 782 511	15 219 214	0	727 505	74 729 231
Debt securities (AC and HTCFS portfolios)	0	0	67 007 262	0	67 007 262
Liabilities to customers	93 508 072	34 677 473	0	0	128 185 546

## Income statement 1.01.2024 – 30.09.2024

<i>In '000 PLN</i>	<b>Retail Banking</b>	<b>Corporate Banking</b>	<b>Treasury. ALM &amp; Other</b>	<b>FX mortgage</b>	<b>TOTAL</b>
Net interest income	3 383 981	652 110	(8 242)	(2 950)	4 024 899
Net fee and commission income	427 519	152 954	3 253	5 029	588 755
Dividends, other income from financial operations and foreign exchange profit	82 483	76 295	3 907	4 524	167 209
Result on non-trading financial assets mandatorily at fair value through profit or loss	3 173	0	6 698	0	9 871
Other operating income and cost	(8 595)	3 242	39 524	(30 628)	3 543
Operating income	3 888 561	884 601	45 140	(24 025)	4 794 277
Staff costs	(712 356)	(152 713)	(22 143)	0	(887 212)
Administrative costs, including:	(363 826)	(66 951)	(84 840)	(86 564)	(602 181)
- BGF costs	(9)	0	(60 841)	0	(60 850)
Depreciation and amortization	(143 725)	(20 190)	(3 086)	0	(167 001)
Operating expenses	(1 219 907)	(239 854)	(110 069)	(86 564)	(1 656 394)
Impairment losses on assets	(257 924)	(69 262)	(4 353)	23 333	(308 206)
Results on modification	38	(1 932)	0	0	(1 894)
Costs of legal risk connected with FX mortgage loans	0	0	0	(2 130 523)	(2 130 523)
<b>Total operating result</b>	<b>2 410 768</b>	<b>573 553</b>	<b>(69 282)</b>	<b>(2 217 779)</b>	<b>697 260</b>
Share in net profit of associated companies					0
Banking tax					(133 512)
<b>Profit / (loss) before income tax</b>					<b>563 748</b>
Income taxes					(17 052)
<b>Profit / (loss) after taxes</b>					<b>546 696</b>

## Income statement 1.07.2024 – 30.09.2024

<i>In '000 PLN</i>	<b>Retail Banking</b>	<b>Corporate Banking</b>	<b>Treasury. ALM &amp; Other</b>	<b>FX mortgage</b>	<b>TOTAL</b>
Net interest income	1 276 001	218 665	(1 893)	(3 691)	1 489 082
Net fee and commission income	145 842	50 543	1 055	1 194	198 634
Dividends, other income from financial operations and foreign exchange profit	27 148	24 649	1 833	1 159	54 789
Result on non-trading financial assets mandatorily at fair value through profit or loss	(413)	0	4 486	0	4 073
Other operating income and cost	(3 893)	3 187	18 159	19 031	36 484
Operating income	1 444 685	297 044	23 640	17 693	1 783 062
Staff costs	(244 109)	(51 708)	(7 432)	0	(303 249)
Administrative costs, including:	(132 855)	(24 617)	(7 800)	(27 120)	(192 392)
- BGF costs	0	0	0	0	0
Depreciation and amortization	(49 572)	(6 897)	(1 023)	0	(57 492)
Operating expenses	(426 536)	(83 222)	(16 255)	(27 120)	(553 133)
Impairment losses on assets	(83 422)	(38 457)	(2 257)	8 501	(115 635)
Results on modification	38	(482)	0	0	(444)
Costs of legal risk connected with FX mortgage loans	0	0	0	(697 687)	(697 687)
<b>Total operating result</b>	<b>934 765</b>	<b>174 883</b>	<b>5 128</b>	<b>(698 613)</b>	<b>416 163</b>
Share in net profit of associated companies					0
Banking tax					(98 990)
<b>Profit / (loss) before income tax</b>					<b>317 173</b>
Income taxes					(127 410)
<b>Profit / (loss) after taxes</b>					<b>189 763</b>

## Balance sheet items as at 31.12.2024

<i>In '000 PLN</i>	<b>Retail Banking</b>	<b>Corporate Banking</b>	<b>Treasury. ALM &amp; Other</b>	<b>FX mortgage</b>	<b>TOTAL</b>
Loans and advances to customers	58 597 069	15 064 253	0	1 313 993	<b>74 975 315</b>
Debt securities (AC and HTCFS portfolios)	0	0	53 600 222	0	<b>53 600 222</b>
Liabilities to customers	91 029 506	26 227 707	0	0	<b>117 257 213</b>



## 7. TRANSACTIONS WITH RELATED ENTITIES

All and any transactions between entities of the Group in 3 quarters 2025 resulted from the current operations.

Apart from transactions described herein, in the indicated period neither Bank Millennium S.A., nor subsidiaries of Bank Millennium S.A. made any other transactions with related entities, which individually or jointly may have been significant and concluded under terms and conditions other than market-based.

### 7.1. TRANSACTIONS WITH THE PARENT GROUP

The following are the amounts of transactions with the Capital Group of Bank's parent company - Banco Comercial Portugues (ultimate parent company), these transactions are mainly of banking nature (in '000 PLN):

	With parent company		With other entities from parent group	
	30.09.2025	31.12.2024	30.09.2025	31.12.2024
<b>ASSETS</b>				
Loans and advances to banks – accounts and deposits	7 468	1 788	0	0
Financial assets held for trading	0	0	0	0
Hedging derivatives	0	0	0	0
Other assets	0	0	0	0
<b>LIABILITIES</b>				
Loans and deposits from banks	83	121	0	0
Debt securities	0	0	0	0
Financial liabilities held for trading	0	0	0	0
Hedging derivatives	0	0	0	0
Other liabilities	374	234	27	14

	With parent company		With other entities from parent group	
	1.01.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.01.2025 - 30.09.2025	1.01.2024 - 30.09.2024
<b>Income from:</b>				
Interest	1 122	4 939	0	0
Commissions	203	155	0	0
Financial assets and liabilities held for trading	0	2 552	0	0
<b>Expense from:</b>				
Interest	0	0	0	0
Commissions	0	0	0	0
Financial assets and liabilities held for trading	0	0	0	0
Other net operating	0	0	0	0
Administrative expenses	140	138	45	0

	With parent company		With other entities from parent group	
	30.09.2025	31.12.2024	30.09.2025	31.12.2024
Conditional commitments	43 710	24 680	0	0
granted	0	0	0	0
obtained	43 710	24 680	0	0
Derivatives (par value)	0	0	0	0

## 7.2. BALANCE OF THE BANK'S SHARES HELD BY THE BANK'S SUPERVISORY AND MANAGEMENT BOARD MEMBERS

Name and surname	Position/Function	Number of shares as of delivery date of IIIQ 2025 report			Number of shares as of delivery date of annual report for year 2024
		TOTAL	including those received under the incentive program, blocked in investment accounts until: 05.05.2026 r.	05.06.2026 r.	
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	Member of the Management Board	198 469	22 525	24 837	151 107
Jaroslawn Hermann	Member of the Management Board	47 362	22525	24837	0
Halina Karpińska	Member of the Management Board	11 995	/-/	/-/	/-/
Antonio Ferreira Pinto Junior	Member of the Management Board	60 975	22 525	24 837	13 613
Magdalena Zmitrowicz	Member of the Management Board	0	/-/	/-/	/-/

Name and surname	Position/Function	Number of shares as of delivery date of IIIQ 2025 report	Number of shares as of delivery date of annual report for year 2024
Olga Grygier-Siddons	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	/-/
Małgorzata Bonikowska	Member of the Supervisory Board	0	/-/
Miguel de Campos Pereira de Bragança	Member of the Supervisory Board	0	0
Agnieszka Kłos-Siddiqui	Member of the Supervisory Board	0	/-/
Anna Mankiewicz-Rębkowska	Member of the Supervisory Board	0	/-/
Alojzy Nowak	Member of the Supervisory Board	0	0
Izabela Olszewska	Member of the Supervisory Board	0	/-/
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	Member of the Supervisory Board	0	0

## 8. FAIR VALUE

The best reflection of fair value of financial instruments is the price which can be obtained for the sale of assets or paid for the transfer of liability in case of market transactions (an exit price). For many products and transactions for which market value to be taken directly from the quotations in an active market (marking-to-market) is not available, the fair value must be estimated using internal models based on discounted cash flows (marking-to-model). Financial cash flows for the various instruments are determined according to their individual characteristics, and discounting factors include changes in time both in market interest rates and margins.

According to IFRS 13 "Fair value measurement" in order to determinate fair value the Group applies models that are appropriate under existing circumstances and for which sufficient input data is available, based to the maximum extent on observable input whereas minimizing use of unobservable input, namely:

Level 1 - valuation based on the data fully observable (active market quotations) for identical transactions;

Level 2 - valuation models using the information not constituting the data from level 1, but observable, either directly or indirectly;

Level 3 - valuation models using unobservable data (not derived from an active market).

Valuation techniques used to determine fair value are applied consistently. Change in valuation techniques resulting in a transfer between these methods occurs when:

- transfer from Level 1 to 2 takes place when for the financial instruments measured according to Level 1 quoted market prices from an active market are not available at the balance sheet day (previously used to be);
- transfer from Level 2 to 3 takes place when for the financial instruments measured according to the Level 2 value of parameters not derived from the market has become significant at the balance sheet day (and previously used to be irrelevant).

### 8.1. FINANCIAL INSTRUMENTS NOT RECOGNIZED AT FAIR VALUE IN THE BALANCE SHEET

All estimation models are arbitrary to some extent and this is why they reflect only the value of those instruments for which they were built. Fair value of these instruments is determined solely in order to meet the disclosure requirements of IFRS 13 and IFRS 7.

The main assumptions and methods applied in estimating fair value of assets and liabilities of the Group are as follows:

#### *Receivables and liabilities with respect to banks*

The fair value of these instruments was determined by discounting the future principal and interest flows with current rates, assuming that the flows arise on contractual dates.

#### *Loans and advances granted to customers valued at amortised cost*

The fair value of such instruments without specified repayment schedule, given their short-term nature and the time-stable policy of the Group with respect to this portfolio, is close to balance-sheet value.

With respect to floating rate leasing products fair value was assessed by adjusting balance-sheet value with discounted cash flows resulting from difference of spreads.

The fair value of instruments with defined maturity is estimated by discounting related cash flows on contractual dates and under contractual conditions with the use of current zero-coupon rates and credit risk margins.

In case of mortgage loans due to their long-term nature estimation of the future cash flows also includes: the effect of early repayment and liquidity risk in foreign currencies.

#### *Debt securities valued at amortised cost*

The fair value of debt securities at amortised cost (mainly Treasury bonds in the Held to Collect portfolio) was estimated based on market quotations basis.

#### *Liabilities to customers*

The fair value of such instruments without maturity or with maturity under 30 days is considered by the Group to be close to balance-sheet value.

Fair value of instruments due and payable in 30 days or more is determined by discounting future cash flows from principal and interest (including the current average margins by major currencies and time periods) using current interest (including the original average margins by major currencies and time periods) in contractual terms.

#### *Subordinated liabilities, debt securities issued and medium-term loans*

The fair value of these financial instruments is estimated on the basis of a model used for determining the market value of floating-rate bonds with the current level of market rates and historical margin for credit risk and in the case of fixed-rate coupon bonds, by discounting cash flows at the current level of market rates and the original credit risk margin. Similar as in loan portfolio the Bank includes the level of the original margin as a part of mid-term cost of financing obtained in the past in relation to the current margin level for the comparable instruments, as long as reliable assessment is possible. Due to lack of the mid-term loans liquid market as a reference to estimate current level of margins, the Bank used the original margin.

The table below presents results of the above-described analyses as at 30.09.2025 (data in PLN thousand):

	Note	Balance sheet value	Fair value
<b>ASSETS MEASURED AT AMORTISED COST</b>			
Debt securities	15	27 176 294	27 561 149
Deposits, loans and advances to banks and other monetary institutions	15	499 102	498 355
Loans and advances to customers	14	74 728 415	75 210 932
<b>LIABILITIES MEASURED AT AMORTISED COST</b>			
Liabilities to banks and other monetary institutions	17	193 004	192 944
Liabilities to customers	18	128 185 546	128 197 641
Debt securities issued	20	6 764 146	6 764 748
Subordinated debt	21	1 556 096	1 555 671

The fair value of debt securities measured at amortized cost, for which market quotations are available, is determined on their basis and, consequently, these assets are included in the first valuation category. Models used for determination of the fair value of other financial instruments presented in the above table and not recognized at fair value in Group's balance sheet, use techniques based on parameters not derived from the market. Therefore, they are considered as the third level of valuation.

The table below presents data as at 31.12.2024 (data in PLN thousand):

	Note	Balance sheet value	Fair value
<b>ASSETS MEASURED AT AMORTISED COST</b>			
Debt securities	15	24 381 485	24 490 907
Deposits, loans and advances to banks and other monetary institutions	15	434 517	434 304
Loans and advances to customers*	14	74 973 490	74 398 190
<b>LIABILITIES MEASURED AT AMORTISED COST</b>			
Liabilities to banks and other monetary institutions	17	204 459	204 459
Liabilities to customers	18	117 257 213	117 251 765
Debt securities issued	20	6 124 775	6 127 207
Subordinated debt	21	1 562 330	1 563 653

\* The negative impact of fair value valuation of the loans portfolio is largely attributable to growth of loan spreads. The methodology, which the Bank uses for valuation of the loans portfolio, assumes that current spreads best reflect existing market conditions and economic situation. In result, paradoxically whenever the spreads of new loans increase, fair value of the "old" loans portfolio falls.

## 8.2. FINANCIAL INSTRUMENTS RECOGNIZED AT FAIR VALUE IN THE BALANCE SHEET

The table below presents balance-sheet values of instruments measured at fair value, by applied fair value measurement technique:

Data in PLN'000, as at 30.09.2025

	Note	Quoted market prices Level 1	Valuation techniques - observable inputs Level 2	Valuation techniques - significant unobservable inputs Level 3
<b>ASSETS</b>				
Financial assets held for trading	12			
Valuation of derivatives		0	69 243	120 713
Equity instruments		177	0	0
Debt securities		745 015	0	0
Transactions with repurchase agreement		479 525	0	0
Non-trading financial assets mandatorily at fair value through profit or loss	14			
Equity instruments		30 001	0	121 580
Debt securities		0	0	21 225
Loans and advances		0	0	816
Financial assets at fair value through other comprehensive income	13			
Equity instruments		626	0	36 231
Debt securities		29 542 756	10 288 212	0
Derivatives – Hedge accounting	16	0	0	0
<b>LIABILITIES</b>				
Financial liabilities held for trading	12			
Valuation of derivatives		0	140 104	122 444
Short positions		498 414	0	0
Derivatives – Hedge accounting	16	0	26 728	0

Data in PLN'000, as at 31.12.2024

	Note	Quoted market prices Level 1	Valuation techniques - observable inputs Level 2	Valuation techniques - significant unobservable inputs Level 3
<b>ASSETS</b>				
Financial assets held for trading	12			
Valuation of derivatives		0	73 321	182 524
Equity instruments		115	0	0
Debt securities		555 364	0	0
Transactions with repurchase agreement		194 218		
Non-trading financial assets mandatorily at fair value through profit or loss	14			
Equity instruments		0	0	66 609
Debt securities		0	0	51 790
Loans and advances		0	0	1 825
Financial assets at fair value through other comprehensive income	13			
Equity instruments		481	0	36 231
Debt securities		20 526 513	8 692 224	0
Derivatives – Hedge accounting	16	0	0	0
<b>LIABILITIES</b>				
Financial liabilities held for trading	12			
Valuation of derivatives		0	40 312	185 991
Short positions		190 769	0	0
Derivatives – Hedge accounting	16	0	101 539	0

The impact of credit valuation adjustments estimated by the Group was not material in relation to individual derivative transactions entered into by the Bank. Consequently, the Bank does not consider the impact of unobservable inputs used in the valuation of derivative transactions to be significant and, in accordance with IFRS 13.73, does not classify such transactions within Level 3 of the fair value hierarchy, with the exception of index options and options embedded in deposits.

Using the criterion of valuation techniques as at 30.09.2025 Group classified into the third category following financial instruments:

- credit exposures with a leverage / multiplier feature inbuilt in the definition of interest rate (these are credit card exposures and overdraft limits for which the interest rate is based on a multiplier: 4 times the lombard rate).
- index options, option transactions are measured at fair value with use of option measurement models, the model measurement is supplemented with impact on fair value of the estimated credit risk parameter;
- VISA Inc. engagement shares; the method of fair value calculation of this instrument considers the time value of money and the time line for conversion of preferred stock in common stock of VISA.
- other equity instruments measured at fair value (unquoted on an active market), in particular, the valuation of one of the companies classified under the category 'Financial assets other than those held for trading, mandatorily measured at fair value through profit or loss', was carried out using three methods: discounted cash flows (DCF), the comparative method, and the method of implied market multiples in two variants (P/E and P/BV)

In the reporting period, the Group did not make transfers of financial instruments between the techniques of fair value measurement.

Changes of fair values of instruments measured on the basis of valuation techniques with use of significant parameters not derived from the market are presented in the table below (in '000 PLN):

	Valuation of derivatives - Indexes options	Valuation of derivatives - Options embedded in deposits	Equity instruments	Debt securities	Loans and advances
<b>Balance on 01.01.2025</b>	<b>178 195</b>	<b>(181 662)</b>	<b>102 840</b>	<b>51 790</b>	<b>1 825</b>
Settlement/sell/purchase	28 767	(27 062)	0	0	(2 371)
Change of valuation recognized in equity	0	0	0	0	0
Interest income and other of similar nature	0	0	0	0	911
Results on financial assets and liabilities held for trading	(88 559)	88 590	0	0	0
Result on non-trading financial assets mandatorily at fair value through profit or loss	0	0	54 971	(30 565)	451
Result on exchange differences	0	0	(5)	0	0
<b>Balance on 30.09.2025</b>	<b>118 403</b>	<b>(120 134)</b>	<b>157 806</b>	<b>21 225</b>	<b>816</b>

For options on indexes concluded on an inactive market, and FX options the Group concludes back-to-back transactions on the interbank market.

	Valuation of derivatives - Indexes options	Valuation of derivatives - Options embedded in deposits	Equity instruments	Debt securities	Loans and advances
<b>Balance on 01.01.2024</b>	<b>405 612</b>	<b>(414 200)</b>	<b>95 154</b>	<b>81 014</b>	<b>19 349</b>
Settlement/sell/purchase	(248 040)	251 045	(46 959)	0	(21 554)
Change of valuation recognized in equity	0	0	7 847	0	0
Interest income and other of similar nature	0	0	0	0	3 285
Results on financial assets and liabilities held for trading	20 623	(18 507)	0	0	0
Result on non-trading financial assets mandatorily at fair value through profit or loss	0	0	46 803	(29 224)	745
Result on exchange differences	0	0	(5)	0	0
<b>Balance on 31.12.2024</b>	<b>178 195</b>	<b>(181 662)</b>	<b>102 840</b>	<b>51 790</b>	<b>1 825</b>

## 9. CONTINGENT LIABILITIES AND ASSETS

### 9.1. LAWSUITS AND RELEVANT PROCEEDINGS

Below please find the data on the court cases pending, brought up by and against entities of the Group.

#### **Court cases brought up by the Group**

Value of the court litigations, as at 30.09.2025, in which entities of the Group were a plaintiff, totaled PLN 3,234.7 million.

#### *Proceedings on infringement of collective consumer interests*

On January 3 2018, the Bank received a decision of the Chairman of the Office for Protection of Competition and Consumers (OPCC Chairman), in which the OPCC Chairman found infringement by the Bank of the rights of consumers. In the opinion of the OPCC Chairman the essence of the violation is that the Bank informed consumers (it regards 78 agreements) in responses to their complaints, that the court verdict stating the abusiveness of the provisions of the loan agreement regarding exchange rates does not apply to them. According to the position of the OPCC Chairman the abusiveness of contract's clauses determined by the court in the course of abstract control is constitutive and effective for every contract from the beginning. As a result of the decision, the Bank was obliged to:

- 1) send information on the UOKiK's decision to the said 78 clients,
- 2) place the information on decision and the decision itself on the website and on Twitter,
- 3) to pay a fine amounting to PLN 20.7 mln.

The Bank lodged an appeal within the statutory time limit.

On January 7, 2020, the first instance court dismissed the Bank's appeal in its entirety. The Bank appealed against the judgment within the statutory deadline. The court presented the view that the judgment issued in the course of the control of a contractual template (in the course of an abstract control), recognizing the provisions of the template as abusive, determines the abusiveness of similar provisions in previously concluded contracts. Therefore, the information provided to consumers was incorrect and misleading. As regards the penalty imposed by OPCC, the court pointed out that the policy of imposing penalties by the Office had changed in the direction of tightening penalties and that the court agrees with this direction.

In the Bank's assessment, the Court should not assess the Bank's behaviour in 2015 from the perspective of today's case-law views on the importance of abstract control (it was not until January 2016 that the Supreme Court's resolution supporting the view of the OPCC Chairman was published), the more penalties for these behaviours should not be imposed using current policy. The above constitutes a significant argument against the validity of the judgment and supports the appeal which the Bank submitted to the Court of second instance.

The second instance court, in its judgment of February 24, 2022, completely revoked the decision of the OPCC Chairman. On August 31, 2022, the OPCC Chairman lodged a cassation appeal to the Supreme Court. On July 3, 2024, the Supreme Court issued a decision accepting the cassation appeal for consideration. The Bank believes that the prognosis regarding the litigation chances of winning the case before the Supreme Court is positive and therefore no provision has been recognized.

#### *Proceedings on competition-restricting practice*



The Bank (along with other banks) is also a party to the dispute with OPCC, in which the OPCC Chairman recognized the practice of participating banks, including Bank Millennium, in an agreement aimed at jointly setting interchange fee rates charged on transactions made with Visa and Mastercard cards as restrictive of competition, and by decision of 29 December 2006 imposed a fine on the Bank in the amount of PLN 12.2 million. The Bank, along with other banks, appealed the decision.

In connection with the judgment of the Supreme Court and the judgment of the Court of Appeal in Warsaw of November 23, 2020, the case is currently pending before the court of first instance - the Court of Competition and Consumer Protection. The Bank has created a provision in the amount equal to the imposed penalty.

### **Court cases against the Group**

As at 30.09.2025, the most important proceedings, in the group of the court cases where the Group's companies were defendant, were following:

- The Bank is a defendant in two court proceedings, in which the subject of the dispute is the amount of the interchange fee. The total value of claims reported in these cases is PLN 729.2 million. The procedure with the highest value of the reported claim is the case brought by PKN Orlen SA, the plaintiff demands payment of PLN 635.7 million. The plaintiff in this proceeding alleges that the banks acted under an agreement restricting competition on the acquiring services market by jointly setting the level of the national interchange fee in the years 2006-2014. In this case, the Bank was sued jointly with another bank and card organizations. In the case brought by LPP S.A. the allegations are similar to those raised in the case brought by PKN Orlen SA, while the period of the alleged agreement is indicated as 2008-2014. In this case, the Bank is sued jointly and severally with another bank. The case was resolved positively for the Bank by the courts of both instances, and is currently at the stage of a cassation appeal filed by LPP S.A. The Supreme Court did not issue a decision regarding the acceptance of the cassation appeal for consideration. According to current estimates of the risk of losing a dispute in these matters, the Bank did not create a provision. In addition, we point out that the Bank participates as a side intervener in three other proceedings regarding the interchange fee. Other banks are the defendant. Plaintiffs in these cases also accuse banks of acting as part of an agreement restricting competition on the acquiring services market by jointly setting the level of the national interchange fee in the years 2008-2014.

- A lawsuit brought up by shareholder of PCZ S.A. in bankruptcy (PHM, then the European Foundation for Polish-Belgian Cooperation - EFWP-B, currently called The European Foundation for Polish-Kenyan Cooperation) against Bank Millennium S.A., worth of the dispute 521.9 million PLN with statutory interest from 05.04.2016 until the day of payment. The plaintiff filed the suit dated 23.10.2015 to the Regional Court in Warsaw; the suit was served to the Bank on 04.04.2016. According to the plaintiff, the basis for the claim is damage to their assets, due to the actions taken by the Bank and consisting in the wrong interpretation of the Agreement for working capital loan concluded between the Bank and PCZ S.A., which resulted in placing the loan on demand. The Bank is requesting complete dismissal of the suit, stating disagreement with the charges raised in the claim. Supporting the position of the Bank, the Bank's attorney submitted a binding copy of final verdict of Appeal Court in Wrocław favourable to the Bank, issued in the same legal state in the action brought by PCZ SA against the Bank. On May 10, 2023, the Court of First Instance announced a judgment dismissing the claim in its entirety. The verdict is not final, the plaintiff filed an appeal.

On May 6, 2024, the Bank's representative submitted a response to the appeal, requesting that it be dismissed in its entirety as unfounded. On December 17, 2024, the Court of Appeal in Warsaw issued a judgment favorable to the Bank, dismissing the Plaintiff's appeal. The judgment is final. The Bank has been served with the Plaintiff's cassation complaint and has submitted a formal response. The Bank is of the opinion that there is a strong likelihood that the Supreme Court will decline to admit the cassation complaint for substantive review.

### **The class action related to the LTV insurance :**

On the 3 of December 2015 a class action was served on the Bank. A group of the Bank's debtors (454 borrowers party to 275 loan agreements) is represented by the Municipal Consumer Ombudsman in Olsztyn. The plaintiffs demanded payment of the amount of PLN 3.5 million, claiming that the clauses of the agreements, pertaining to the low down payment insurance, are unfair and thus not binding. Plaintiff extended the group in the court letter filed on the 4th of April 2018, therefore the claims increased from PLN 3.5 million to over PLN 5 million.

Actual status:

On the 1 of October 2018, the group's representative corrected the total amount of claims pursued in the proceedings and submitted a revised list of all group members, covering the total of 697 borrowers – 432 loan agreements. The value of the subject of the dispute, as updated by the claimant, is PLN 7,371,107.94.

By the resolution of 1 April 2020 the court established the composition of the group as per request of the plaintiff and decided to take witness evidence in writing. On 18.10.2024, the Court adjourned the hearing without setting a new date. The court decided to disregard the evidence from the hearing of the parties and obliged the parties to submit documents - agreements concluded between the group members and the Bank and final judgments regarding the agreements in question. The court adjourned the hearing without specifying a new date. The Bank submitted the above-mentioned documents in a letter dated December 17, 2024, while the group representative, in performance of the obligation, submitted two letters containing documents confirming the legitimacy of individual group members. The court obliged the Bank to submit a position in response to the letters of the group representative. The obligation has been fulfilled.

The Bank has recognized a provision for this case in the amount of PLN 4.4 million

As at 30 September 2025, there were also 70 individual court cases regarding LTV insurance (cases in which only a claim for the reimbursement of the commission or LTV insurance fee is presented).

### **Lawsuits filed by Financial Ombudsman for discontinuation of unfair market practices**

On 13 August 2020 the Bank received lawsuit from the Financial Ombudsman. The Financial Ombudsman, in the lawsuit, demands that the Bank and the Insurer (TU Europa) be ordered to discontinue performing unfair market practices involving, as follows:

- presenting the offered loan repayment insurance as protecting interests of the insured in case when insurance structure indicates that it protects the Bank's interests;
- use of clauses linking the value of insurance benefit with the amount of borrower's debt;
- use of clauses determining the amount of insurance premium without prior risk assessment (underwriting);
- use of clauses excluding insurer's liability for insurance accidents resulting from earlier causes.

Furthermore, the Ombudsman requires the Bank to be ordered to publish, on its web site, information on use of unfair market practices.

The lawsuit does not include any demand for payment, by the Bank, of any specified amounts. Nonetheless, if the practice is deemed to be abusive it may constitute grounds for future claims to be filed by individual clients.

The case is being examined by the court of first instance. The court is still continuing the evidentiary proceedings.

## **Court cases concerning the free loan sanction (within the meaning of the Consumer Credit Act)**

By September 30, 2025, the Bank received 2,073 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.

Based on publicly available information, it can be assumed that there will be an increase in the number of lawsuits 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.

As of September 30, 2025, 304 cases have been legally concluded, in 267 cases the Bank won the dispute and lost in 37 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. Currently, the Bank's litigation chances in the cases in question are assessed positively.

On 13 February 2025, the Court of Justice of the European Union issued a judgment in a case registered under the reference number C472/23 as a result of an application filed by the District Court for the Capital City of Warsaw. In its judgment, the CJEU, interpreting the provisions of Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on consumer credit agreements, found that:

(i) the fact that a credit agreement indicates an annual percentage rate which turns out to be inflated because certain terms of that agreement were subsequently found to be unfair within the meaning of Article 6(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts and therefore not binding on the consumer, does not in itself constitute an infringement of the obligation to provide information laid down in that provision of Directive 2008/48.

(ii) the fact that a credit agreement lists a number of circumstances justifying an increase in the fees related to the performance of the agreement, without a properly informed and sufficiently observant and reasonable consumer being able to verify their occurrence or their impact on those fees, constitutes an infringement of the information obligation laid down in that provision, provided that this indication may undermine the consumer's ability to assess the extent of his obligation.

(iii) Directive 2008/48 does not preclude national legislation which provides, in the event of a breach of the obligation to provide for information imposed on the creditor in accordance with Article 10(2) of that directive, a uniform penalty consisting in depriving the creditor of the right to interest and fees, irrespective of the individual degree of gravity of such a breach, provided that such breach may undermine the consumer's ability to assess the extent of his obligation.

Following the judgment of the Tribunal, it is still up to the domestic courts to assess the possibility of crediting non-interest costs of the loan and to assess compliance with the information obligation regarding the possibility of changing fees. The CJEU also noted that the right to benefit from the free loan sanction is updated only if a potential breach of the bank may undermine the consumer's ability to assess the scope of his liability. Law firms purchasing clients' receivables publicize the judgment as a ruling with a favorable ruling for consumers (opposite to the view of the Bank), which may translate into an increase in the number of new cases.

On 9 October 2025, the Court of Justice of the European Union, in case registered under reference C-80/24, following a request submitted by the District Court for Warsaw – Śródmieście in Warsaw, while interpreting the provisions of Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC, as well as Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts, held that:

(i) Article 22(2) of Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC must be interpreted as meaning that it does not preclude national legislation allowing a consumer to assign to a third party, who is not a consumer, a claim based on the infringement of a right granted to him under national provisions implementing that Directive.

(ii) Articles 6(1) and 7(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts must be interpreted as meaning that a national court is not required to examine of its own

motion the unfair nature of a term in an assignment agreement concluded by a consumer, where the dispute pending before that court between the assignee company and the trader does not concern that assignment agreement but rather the consumer's claim against that trader.

On March 21, 2025, the Financial Stability Committee issued a resolution (No. 79/2025) on the position regarding the risk associated with the sanction of free credit (SKD). The Committee noted that 'while the violations listed in the Consumer Credit Act are of a varied nature and severity, the sanction itself is not subject to gradation. The inability to moderate sanctions creates a system of incentives to instrumentally use the benefits of the SKD and to undermine credit agreements, regardless of whether the violation has economic consequences for the borrower or not'.

On 19 September 2025, the Financial Stability Committee convened. In the communiqué issued following the meeting, the Committee stated:

'in the context of SKD-related risk, the Committee concluded that the draft Consumer Credit Act presented for public consultation did not adequately reflect the FSC's position on the risks associated with the application of the free credit sanction. The Committee notes that no regulatory measures have been introduced that sufficiently restrict the scope and possibility of applying this sanction. The Committee continues to identify areas that may facilitate the misuse of legal provisions intended to protect consumers.'

As at September 30, 2025, the Bank had not recognized provisions for legal risk related to the free loan sanction.

### **Court cases regarding mortgage loans in PLN**

By September 30, 2025, the Bank recorded the receipt of 211 lawsuits by borrowers of mortgage loans in PLN for reimbursement of benefits provided under the loan agreement. Three final and favorable 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.

Based on publicly available information, it can be assumed that there will be an increase in the number of lawsuits concerning mortgage loans in PLN. This phenomenon affects the entire sector of banking services. It is possible that a "new 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.

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.

As at September 30, 2025, the Bank had not recognized provisions for legal risk related to mortgage loans in PLN.

### **Handling of unauthorised transactions**

Currently, in connection with the activities of Bank Millennium - as it is the case with the activities of other banks in Poland - the President of the Office of Competition and Consumer Protection is conducting proceedings on the use of practices infringing the collective interests of consumers as regards the so-called "unauthorized transactions". In the opinion of the President of the Office of Competition and Consumer Protection, in the case of Bank Millennium, such actions include the following: (i) failure – no later than by the end of the business day after the date of receipt of an appropriate notification from the consumer regarding the occurrence of an unauthorised payment transaction – to refund the amount of the unauthorised payment transaction or to restore the debited payment account to the state that would have existed if the unauthorised payment transaction had not taken place, despite the lack of justified and duly documented grounds to suspect fraud on the part of the consumer and informing the authorities appointed to prosecute crimes about this suspicion in writing, as well as (ii) providing consumers – in the replies to their reports regarding the occurrence of unauthorized payment transactions – with information about the verification by the payment service provider of the correct use of the payment instrument by using individual authentication data in a way suggesting that the Bank's demonstration only that the disputed payment transactions have been correctly authenticated constitutes at the same time demonstration of the authorization of such a transaction and excludes its obligation to return the amount of the unauthorized transaction and (iii) providing consumers – in the replies to their reports regarding the occurrence of unauthorized payment transactions – with false information about authorization of the transactions questioned by consumers, while presenting information indicating that the transactions took place as a result of an intentional or grossly negligent violation by consumers of at least one of the obligations referred to in Article 42 of the Payment Services Act and in the agreement between the consumer and the bank, as a result of which they are liable for the questioned payment transactions.

In the course of the proceedings, the Bank provided appropriate explanations and also substantively referred to the allegations formulated by the President of the Office of Competition and Consumer Protection. The proceedings have been extended until the end of 2025.

On 18.04.2025, the Bank filed an application for a binding decision pursuant to Article 28 section 1 of the Act on Competition and Consumer Protection. The application (proposal) includes all allegations presented by the UOKiK, i.e. changes in the procedure for handling reports regarding unauthorized payment transactions, changes in the classification of a given transaction as authorized and changes in complaint response templates. The application also includes a proposal for "compensation" for customers whose complaints were rejected. Currently, discussions with the President of the UOKiK regarding the issuance of a commitment decision are still ongoing.

In connection with the proceedings, the Bank recognized a provision as at the end of September 2025 in the amount of PLN 82 million based on estimated outflow of funds.

As of September 30, 2025, the Bank was a party to 348 court proceedings in which customers questioned the fact of their authorization of a transaction. In the cases in question, the Bank makes an individual assessment of the litigation chances in each of the court cases. In cases where, in the Bank's opinion, there is a greater probability of losing the dispute than winning it, provisions in the amount resulting from the potential loss of the Bank are created.

As at 30.09.2025, the total value of the subjects of the other litigations in which the Group's companies appeared as defendant, stood at PLN 5,563.2 million (excluding the class actions described in the **Chapter 10**). In this group the most important category are cases related with FX loans mortgage portfolio.

### FX mortgage loans legal risk

FX mortgage loans legal risk is described in the **Chapter 10**. "Legal risk related to foreign currency mortgage loans".

## 9.2. OFF – BALANCE ITEMS

<i>Amount '000 PLN</i>	<b>30.09.2025</b>	<b>31.12.2024</b>
Commitments granted:	15 470 760	13 441 260
loan commitments	13 579 574	11 754 380
guarantee	1 891 186	1 686 880
Commitments received:	2 846 168	2 730 692
financial	0	346
guarantee	2 846 168	2 730 346



## 10. LEGAL RISK RELATED TO FOREIGN CURRENCY MORTGAGE LOANS

On September 30, 2025, the Bank had 18,950 loan agreements and additionally 2,334 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 (45% loans agreements before the courts of first instance and 55% loans agreements before the courts of second instance) with the total value of claims filed by the plaintiffs amounting to PLN 3,955.2 million and CHF 324.0 million (Bank Millennium portfolio: PLN 3,452.6 million and CHF 312.1 million and former Euro Bank portfolio: PLN 502.6 million and CHF 11.9 million). 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 18,950 BM loan agreements in ongoing individual cases 450 are also part of class action. From the total number of individual litigations against the Bank approximately 4,400 or 23% were submitted by borrowers that had already naturally or early fully repaid the loan or were converted to polish zloty at the moment of submission. Approximately another 1,000 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.

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 1,517. Out of 1,517 loan agreements in class action 450 are also part of ongoing individual cases, 44 concluded settlements and 61 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 and October 6, 2025, the court issued orders setting aside the judgment and discontinuing the proceedings from the persons who entered into amicable settlements. Based on these orders, the number of credit agreements covered by the class action dropped from 3,273 to 1,517.

Until the end of 2019, 1,980 individual claims were filed against the Bank (in addition, 235 against former Euro Bank), in 2020 the number increased by 3,002 (265), in 2021 the number increased by 6,152 (421), in 2022 the number increased by 5,753 (407), in 2023 the number increased by 6,863 (645), in 2024 the number increased by 5,836 (655), while in the first three quarters of 2025 the number increased by 3,014 (356).

Based on ZBP (the Polish Banking Association) data gathered from all banks having FX mortgage loans, vast majority of disputes were finally resolved against the banks. As far as Bank Millennium (incl. former Euro Bank portfolio) is concerned, from 2015 until end of the third quarter of 2025, 14,613 cases were finally resolved (14,485 in claims submitted by clients against the Bank and 128 in claims submitted by the Bank against clients i.e. debt collection cases) out of which 4,631 were settlements, 121 were remissions, 83 rulings were favourable for the Bank and 9,778 were unfavourable including both invalidation of loan agreements as well as conversions into PLN+LIBOR. The Bank undertakes proper legal actions in order to secure repayment of initially disbursed capital of the loan.

The outstanding gross balance of the loan agreements under individual court cases and class action against the Bank (incl. former Euro Bank portfolio) on 30 September 2025 was CHF 945 million (of which the outstanding amount of the loan agreements under the class action proceeding was CHF 66 million).

In the 3 quarters of the year 2025, the Bank created PLN 1,314 million of provisions for Bank Millennium originated portfolio and PLN 189.2 million for the former Euro Bank originated portfolio. The balance sheet value of provisions for the Bank Millennium portfolio at the end of September 2025 was PLN 6,968.3 million, and for the former Euro Bank portfolio - PLN 837.6 million.

The methodology developed by the Bank of calculating provisions for legal risk involved with indexed loans is based on the following main parameters resulting from historical observations or expert assumptions::

- (i) the number of ongoing cases (including class action agreements);  
the number of potential future court case: the Bank monitors customer behaviors, analyzes 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 2.6 thousand 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 attributes a much lower probability of becoming the subject of a court case, Bank anticipates that approximately 1.8 thousand of the roughly 35,8 thousand repaid loans — those with the strong economic rationale for initiating legal proceedings against the Bank and which were not previously subject to a settlement — may result in future litigation initiated by the borrowers;
- (ii) estimates involved with amicable settlements with clients, concluded in court or out of court:
  - a. the bank assumes a 12% probability of success in concluding a settlement as part of negotiations conducted with clients in the course of court proceedings;
  - b. negotiations are conducted on a case-by-case basis and can be stopped at any time by the Bank;
  - c. due to significant negotiation efforts already made in the past, the probability of success in these negotiations in the future is decreasing, and at the same time most customers have already contacted the Bank regarding the possible conversion of loans into PLN.

The Bank is open to negotiate case by case conditions for early repayment or conversion of loans to PLN. As a result of these negotiations, the number of active FX mortgage loans originated by Bank Millennium decreased by 29,274. As of the end of the first three quarters of 2025, the Bank had 17,779 active FX mortgage loans.

Legal risk from former Euro Bank portfolio is fully covered by Indemnity Agreement with Société Générale S.A.

On December 8, 2020, Mr. Jacek Jastrzębski, the Chairman of the Polish Financial Supervision Authority ("PFSA") proposed a "sector" solution to address the sector risks related to FX mortgages. The solution would consist in offering banks' clients a voluntary possibility of concluding arrangements based on which a client would settle a CHF Mortgage Loan as if it was a PLN loan bearing interest at an appropriate WIBOR rate increased by the margin historically employed for such loans. The Bank in practice has been using elements of the proposal of above system solution on many individual negotiations with FX mortgage borrowers, including in the course of court proceedings.

Due to the circumstances stemming from the CJEU which excludes demanding by the Bank amounts exceeding the return of disbursed capital, the possibility of successful implementation of a general offer of KNF solution is low.



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 restitutionary 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, and thus increase the efficiency of the justice system and speed up 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.

### **The Court of Justice of the European Union and the Polish Supreme Court rulings relevant to risk assessment**

#### *Jurisprudence of the Court of Justice of the European Union*

On 3 October 2019, the Court of Justice of the European Union (the CJEU) issued the judgment in Case C-260/18 in connection with the preliminary questions formulated by the District Court of Warsaw in the case against Raiffeisen Bank International AG. The judgment of the CJEU, as regards the interpretation of European Union law made therein, is binding on domestic courts. The judgment in question interpreted Article 6 of Directive 93/13. In the light of the subject matter judgment the said provision must be interpreted in such a way that (i) the national court may invalidate a credit agreement if the removal of unfair terms detected in this agreement would alter the nature of the main subject-matter of the contract; (ii) the effects for the consumer's situation resulting from the cancellation of the contract must be assessed in the light of the circumstances existing or foreseeable at the time when the dispute arose and the will of the consumer is decisive as to whether he wishes to maintain the contract; (iii) Article 6 of the Directive precludes the filling-in of gaps in the contract caused by the removal of unfair terms from the contract solely on the basis of national legislation of a general nature or established customs; (iv) Article 6 of the Directive precludes the maintenance of unfair terms in the contract if the consumer has not consented to the maintenance of such terms. It can be noticed the CJEU found doubtful the possibility of a credit agreement being performed further in PLN while keeping interest calculated according to LIBOR.

The CJEU judgment concerns only the situation where the national court has previously found the contract term to be abusive. It is the exclusive competence of the national courts to assess, in the course of judicial proceedings, whether a particular contract term can be regarded as abusive in the circumstances of the case.

On 29 April 2021, the CJEU issued the judgement in the case C-19/20 in connection with the preliminary questions formulated by the District Court in Gdańsk in the case against of ex-BPH S.A., the CJEU said that:

- (i) it is for the national court to find that a term in a contract is unfair, even if it has been contractually amended by those parties. Such a finding leads to the restoration of the situation that the consumer would have been in in the absence of the term found to be unfair, except where the consumer, by means of amendment of the unfair term, has waived such restoration by free and informed consent. However, it does not follow from Council Directive 93/13 that a finding that the original term is unfair would, in principle, lead to annulment of the contract, since the amendment of that term made it possible to restore the balance between the obligations and rights of those parties arising under the contract and to remove the defect which vitiated it;
- (ii) the national court may remove only the unfair element of a term in a contract concluded between a seller or supplier and a consumer where the deterrent objective pursued by Council Directive 93/13 is ensured by national legislative provisions governing the use of that term, provided that that element consists of a separate contractual obligation, capable of being subject to an individual examination of its unfair nature. At the same time, provisions of the Directive preclude the referring court from removing only the unfair element of a term in a contract concluded between a seller or supplier and a consumer where such removal would amount to revising the content of that term by altering its substance;
- (iii) the consequences of a judicial finding that a term if a contract concluded between a seller or supplier and a consumer is unfair are covered by national law and the question of continuity of the contract should be assessed by the national court of its own motion in accordance with an objective approach on the basis of those provisions;
- (iv) the national court, finding that a term in a contract concluded between a seller or supplier and a consumer is unfair, shall inform the consumer, in the context of the national procedural rules after both parties have been heard, of the legal consequences entailed by annulment of the contract, irrespective of whether the consumer is represented by a professional representative.

On November 18, 2021, the Court of Justice of the European Union (CJEU) issued a judgment in case C-212/20 in connection with questions submitted by the District Court for Warsaw Wola in Warsaw in the case against Raiffeisen Bank International AG. The CJEU stated that:

- (i) the content of the clause of the loan agreement concluded between the entrepreneur and the consumer fixing the purchase and sale price of the foreign currency to which the loan is indexed should, on the basis of clear and comprehensible criteria, enable the consumer who is reasonably well informed and sufficiently observant and rational to understand how the exchange rate of the foreign currency used to calculate the amount of the loan instalments is determined, so that the consumer is able to determine himself at any time the exchange rate used by the entrepreneur;
- (ii) a national court which has found that a term of the agreement concluded between an entrepreneur and a consumer is unfair cannot interpret that term in order to mitigate its unfairness, even if such an interpretation would correspond to the common will of the parties.

On 10 June 2021, the Court of Justice of the European Union (CJEU) issued an order in case C-198/20 in connection with questions submitted by the District Court for Warsaw Wola in Warsaw in the case against Santander Bank Polska SA. The CJEU stated that the protection provided for in Council Directive 93/13/EEC is granted to all consumers, not just those who can be considered to be “duly informed and reasonably observant and circumspect average consumer”.

On 8 September 2022, the Court of Justice of the European Union (CJEU) issued a judgment in joined cases C-80/21, C-81/21, C-82/21 in connection with questions submitted by the District Court for Warsaw Śródmieście in Warsaw in cases against Deutsche Bank SA and mBank SA. The CJEU stated that:

- (i) a national court may find that the parts of a contractual term of the agreement concluded between a consumer and an entrepreneur which render it unfair are unfair, if such a deletion

- would not amount to a change in the content of that term that affects its substance, which is for the referring court to verify;
- (ii) a national court cannot, after annulling an unfair term contained in an agreement concluded between a consumer and an entrepreneur which does not render the agreement invalid in its entirety, replace that term with a supplementary provision of the national law;
  - (iii) a national court may not, after having declared invalid an unfair term contained in an agreement concluded between a consumer and an entrepreneur which entails the invalidity of that agreement in its entirety, replace the contractual term which has been declared invalid either by interpretation of the parties' declaration of intent in order to avoid the cancellation of that agreement or by a provision of national law of a supplementary nature, even if the consumer has been informed of the effects of the invalidity of that agreement, and accepted them;
  - (iv) the ten-year limitation period for a consumer's claim seeking reimbursement of sums unduly paid to the entrepreneur in performance of an unfair term of a loan agreement does not start to run on the date of each performance made by the consumer if the consumer was not able on that date to assess on his own the unfairness of the contractual term or if he had not become aware of the unfair nature of that term and without taking into account the circumstances that the agreement provided for a repayment period – in this case thirty years – well in excess of the ten-year statutory limitation period.

On March 16, 2023, the Court of Justice of the European Union issued a judgment in a case registered under case number C-6/22, following preliminary questions submitted by the District Court for Warsaw-Wola in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that:

- (i) in the event that a contract concluded between a consumer and a seller or supplier is declared invalid because one of its terms is unfair, it is for the Member States, by means of their national law, to make provision for the effects of that invalidation, in compliance with the protection granted to the consumer by that directive, in particular, by ensuring the restoration of the legal and factual situation that he or she would have been in if that unfair term had not existed;
- (ii) a national court is not allowed:
  - a. to examine of its own motion, without any prerogative conferred on it by national law in that regard, the financial situation of a consumer who has sought the invalidation of the contract between him or her and a seller or supplier on account of the presence of an unfair term without which the contract cannot legally continue to exist, even if that invalidation is liable to expose the consumer to particularly unfavorable consequences and
  - b. to refuse to declare that invalidation where the consumer has expressly sought it, after being objectively and exhaustively informed of the legal consequences and the particularly unfavorable financial consequences which it may have for him or her;
- (iii) a national court is not allowed, after it has found that a term in a contract concluded between a seller or supplier and a consumer is unfair, to fill gaps resulting from the removal of the unfair term contained therein by the application of a provision of national law which cannot be characterised as a supplementary provision. However, it is for the national court, taking account of its domestic law as a whole, to take all the measures necessary to protect the consumer from the particularly unfavorable consequences which annulment of the contract might entail for him or her.

On June 8, 2023, the Court of Justice of the European Union issued a judgment in a case registered under case number C-570/21, following preliminary questions submitted by the District Court in Warsaw in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that:

- (i) provisions of Council Directive 93/13 must be interpreted as meaning that the concept of 'consumer', within the meaning of that provision, covers a person who has concluded a loan contract intended for a purpose in part within and in part outside his or her trade, business or profession, together with a joint-borrower who did not act within his or her trade, business or

- profession, where the trade, business or professional purpose is so limited as not to be predominant in the overall context of that contract;
- (ii) provisions of Directive 93/13 must be interpreted as meaning that in order to determine whether a person falls within the concept of ‘consumer’, within the meaning of that provision, and, specifically, whether the trade, business or professional purpose of a loan contract concluded by that person is so limited as not to be predominant in the overall context of that contract, the referring court is required to take into consideration all the relevant circumstances surrounding that contract, both quantitative and qualitative, such as, in particular, the distribution of the borrowed capital between, on the one hand, a trade, business or profession and, on the other hand, a non-professional activity and, where there are several borrowers, the fact that only one of them is pursuing a professional purpose or that the lender made the grant of credit intended for consumer purposes conditional on a partial allocation of the amount borrowed to the repayment of debts connected with a trade, business or profession.

On June 15, 2023, the Court of Justice of the European Union issued a judgment in a case registered under case number C-287/22, following preliminary questions submitted by the District Court in Warsaw in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that provisions of the Directive 93/13 must be interpreted as precluding national case-law according to which a national court may dismiss an application for the grant of interim measures lodged by a consumer seeking the suspension, pending a final decision on the invalidity of the loan agreement concluded by that consumer on the ground that that loan agreement contains unfair terms, of the payment of the monthly instalments due under that loan agreement, where the grant of those interim measures is necessary to ensure the full effectiveness of that decision.

On June 15, 2023, the CJEU issued a judgment in a case registered under case number C-520/21, following preliminary questions submitted by the District Court in Warsaw in a case against Bank Millennium, in which indicated that Directive 93/13 does not expressly regulate the consequences of invalidity of a contract concluded between a credit institution and a consumer after the removal of unfair terms contained therein. The CJEU stated that:

- (i) the provisions of the Directive 93/13 do not preclude a judicial interpretation of national law, according to which the consumer has the right to demand compensation from the credit institution beyond the reimbursement of monthly instalments and costs paid for the performance of this contract and the payment of statutory default interest from the date of the request for payment provided that the objectives of Directive 93/13 and the principle of proportionality are respected;
- (ii) the provisions of Directive 93/13 preclude the judicial interpretation of national law, according to which a credit institution has the right to demand compensation from the consumer that goes beyond the return of the capital paid for the performance of this contract and beyond the payment of statutory default interest from the date of the request for payment.

On September 21, 2023, the CJEU issued a judgement in a case registered under case number C-139/22, following preliminary questions submitted by the District Court in Warsaw in a case against mBank. The CJEU stated that:

- (i) provisions of the Directive 93/13 must be interpreted as not precluding a contractual term which has not been individually negotiated from being regarded as unfair by the national authorities concerned merely by virtue of the fact that its content is equivalent to that of a standard contract term entered in the national register of standard business terms held to be unlawful;
- (ii) the contractual term which, because of the circumstances for the performance of certain obligations of the consumer concerned provided for in that term, must be regarded as unfair, may not cease to be considered unfair on account of another term of that contract which provides for the possibility for that consumer to perform those obligations under different circumstances;

- (iii) a seller or supplier is obliged to inform the consumer concerned of the essential characteristics of the contract concluded with that seller or supplier and the risks associated with that contract, even though that consumer is its employee and has relevant knowledge in the field of the contract.

On December 7, 2023, the CJEU issued the judgement in the case C-140/22 in connection with the preliminary questions formulated by the District Court in Warsaw in the case against of mBank S.A. The Court stated that provisions of the Directive 93/13 must be interpreted as meaning that, in the context of the cancellation, in its entirety, of a mortgage loan agreement concluded with a consumer by a banking institution on the ground that that agreement contains an unfair term without which it cannot continue in existence:

- (i) they preclude the judicial interpretation of national law according to which the exercise of the rights which that consumer draws from that directive is conditional on the lodging, by that consumer, before a court, of a declaration by which he or she states, first, not to consent to that unfair term remaining effective, secondly, to be aware of the fact that the nullity of that term entails the cancellation of that agreement and, moreover, of the consequences of that cancellation and, thirdly, to consent to the cancellation of that agreement;
- (ii) they preclude the compensation sought by the consumer concerned in respect of the restitution of the sums paid by him or her in the performance of the agreement at issue being reduced by the equivalent of the interest which that banking institution would have received if that agreement had remained in force.

The Court of Justice of European Union by an order of December 11, 2023, closed the case registered under case number C-756/22 initiated by the District Court in Warsaw in the case brought by Bank Millennium and ruled that the provisions of Directive 93/13 must be interpreted as meaning that, in the context of declaring a mortgage loan agreement concluded with a consumer by a banking institution to be invalid in its entirety on the grounds that, that the contract contains unfair terms without which it cannot be continued, they preclude a judicial interpretation of the law of a Member State according to which that institution is entitled to recover from that consumer amounts other than the capital paid in performance of that contract and statutory interest for delay from the time of the demand for payment.

On December 14, 2023, the CJEU issued the judgement in the case C-28/22 in connection with the preliminary questions referred by the District Court in Warsaw in the case of ex-Getin Noble Bank S.A. The Court stated that:

- (i) provisions of Directive 93/13 read in the light of the principle of effectiveness must be interpreted as precluding a judicial interpretation of national law according to which, following the cancellation of a mortgage loan agreement concluded with a consumer by a seller or supplier, on account of unfair terms contained in that agreement, the limitation period for the claims of that seller or supplier stemming from the nullity of that agreement starts to run only as from the date on which the agreement becomes definitively unenforceable, whereas the limitation period for the claims of that consumer stemming from the nullity of that agreement begins to run as from the day on which the consumer became aware, or should reasonably have become aware, of the unfair nature of the term entailing such nullity;
- (ii) provisions of the Directive 93/13 must be interpreted as not precluding a judicial interpretation of national law according to which it is not for a seller or supplier who has concluded a mortgage loan agreement with a consumer to ascertain whether the consumer is aware of the consequences of the removal of the unfair terms contained in that agreement or of that agreement being no longer capable of continuing in existence if those terms were removed;
- (iii) provisions of the Directive 93/13, read in the light of the principle of effectiveness, must be interpreted as precluding a judicial interpretation of national law according to which, where a mortgage loan agreement concluded with a consumer by a seller or supplier is no longer capable of continuing in existence after the unfair terms in that agreement have been removed, that seller or supplier may rely on a right of retention which allows him or her to make the restitution



of the sums which it has received from that consumer conditional on that consumer making an offer to repay the sums which he or she has himself or herself received from that seller or supplier or to provide a security for the repayment of those sums, where the exercise by that seller or supplier of that right of retention entails the loss, for that consumer, of the right to obtain default interest as from the expiry of the time limit set for performance by the seller or supplier concerned, following receipt by that seller or supplier of a request to repay the sums he or she had been paid in performance of that agreement.

The Court of Justice of the European Union by an order of January 15, 2024, closed the case registered under case number C-488/23 following a question from the District Court of Warsaw, indicating that the right of a financial institution to demand the valorization of the disbursed capital after a loan agreement has been declared invalid was excluded in the judgment of June 15, 2023 issued in case C-520/21.

On January 18, 2024, the CJEU issued the judgement in the case C-531/22 in connection with the preliminary questions referred by the District Court in Warsaw in the case of ex-Getin Noble Bank S.A. The Court stated that:

- (i) the provisions of Directive 93/13 preclude national legislation which provides that a national court may not examine of its own motion the potentially unfair nature of the terms contained in a contract and draw the consequences thereof, where it is supervising enforcement proceedings carried out on the basis of a final decision to issue an order for payment which is subject to res judicata:
  - a. if the regulations do not provide for such an examination at the stage of issuing a payment order, or
  - b. if such examination is provided for only at the stage of opposition to the order for payment in question, provided that there is a significant risk that the consumer in question will not file the required opposition either because the time limit specified for this purpose is very short, or because of the cost of the proceedings before the court in relation to the amount of the disputed debt, or because the national legislation does not provide for the obligation to provide that consumer with all the information necessary for him to establish the extent of his rights;
- (ii) the provisions of Directive 93/13 do not preclude national case law according to which the entry of a term of a contract in a national register of prohibited clauses has the effect of declaring that term unfair in any proceedings involving a consumer, including against a trader other than the one against whom proceedings for the entry of the said term in that national register were pending, and where that term does not have the same wording as the term entered in the said register, but has the same meaning and has the same effect with respect to the consumer in question.

By decision of 3 May 2024, the Court of Justice of the European Union closed the case registered under case no. C-348/23 following a question from the District Court in Warsaw, indicating that they preclude the recognition that the legal effects related to the declaration of invalidity of the contract are conditional on the fulfilment by the consumer of the condition precedent for that consumer to make a declaration before the national court, that it does not agree to maintain the contractual term in force and that it is aware that the invalidity of the said term entails the annulment of the loan agreement and its effects and that it consents to the annulment of the agreement.

By decision of 8 May 2024, the Court of Justice of the European Union closed the case registered under case no. C-424/22 as a result of a question from the Regional Court in Kraków, indicating that they preclude the application by a financial institution of the right of retention which makes the consumer's

receipt of the amounts awarded to him by the court conditional on the consumer's simultaneous offer of reimbursement or security for the return of the entire benefit received from that financial institution.

On June 19, 2025, the Court of Justice of the European Union issued a judgment in Case C-396/24 following preliminary questions referred by the District Court in Krakow in the case . The Court held that:

- (i) Article 7(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts must be interpreted as meaning that: It precludes national case-law according to which, where a term of a loan agreement found to be unfair leads to the invalidity of that agreement, the trader is entitled to demand from the consumer the return of the entire nominal amount of the loan granted, regardless of the amounts repaid by the consumer under that agreement and regardless of the remaining amount to be repaid.
- (ii) Article 7(1) of Directive 93/13 must be interpreted as meaning that: It precludes national provisions under which, in the event of the consumer acknowledging the trader's claim for the return of amounts paid under a loan agreement found to be invalid due to an unfair term contained therein, the court hearing the case is required ex officio to give the judgment upholding that claim immediate enforceability, unless national law allows that court to take all necessary measures to protect the consumer from particularly harmful consequences that may result from giving such enforceability to that judgment.

#### *Jurisprudence of the Polish Supreme Court*

On 7 May 2021, the Supreme Court composed of 7 judges of the Supreme Court, issued a resolution for which the meaning of legal principle has been granted, stating that:

- (i) an abusive contractual clause (art. 385(1) § 1 of the Civil Code), by force of the law itself, is ineffective to the benefit of the consumer who may consequently give conscious and free consent to this clause and thus restore its effectiveness retroactively;
- (ii) if without the ineffective clause the loan agreement cannot bind, the consumer and the lender shall be eligible for separate claims for return of monetary performances made in exercising this agreement (art. 410 § 1 in relation to art. 405 of the Civil Code). The lender may demand return of the performance from the moment the loan agreement becomes permanently ineffective.

On April 28, 2022 the Supreme Court issued a resolution (III CZP 40/22) in which it indicated that in disputes with consumers, the provision of Article 358(1) of the Civil Code is a special provision to Article 353(1) of the Civil Code, which means that if the prerequisites for the application of both provisions exist, the court should apply the special provision and declare the contractual provision permanently ineffective, rather than invalid. This decision of the Supreme Court should be perceived as significantly limiting the risk of the bank's claims for return of capital being time-barred.

The effect of the Supreme Court's resolution of 7 May 2021 is that the bank is entitled to a refund of the cash benefit provided by the bank in performance of a permanently ineffective contract. Taking into account the uncertainty as to the starting point of the limitation period for the bank's claims, the Bank, in order to protect its interests, files lawsuits for payment against borrowers in a court dispute with the Bank and in other circumstances where such risk may exist. The Bank's demand consists of a claim for return of the capital made available to the borrower under the contract. By 30 September 2025 the Bank filed 16,062 lawsuits against the borrowers.

On 25 April 2024, a session of the Civil Chamber of the Supreme Court was held to answer questions formulated by the First President of the Supreme Court, published on 29 January 2021, on key issues related to FX mortgage loan agreements. The Supreme Court, composed of the entire Civil Chamber, adopted a resolution having the force of a legal principle, in which it stated that:

- (i) When finding that a provision of an indexed or denominated credit agreement relating to the manner of determining the foreign currency exchange rate constitutes an unfair contractual provision and is not binding, then in currently existing legal situation it cannot be stated that such a provision could be replaced by another formula of defining the foreign currency exchange rate resulting from law or custom.
- (ii) In case of impossibility to determine the foreign currency exchange rate binding the parties in the indexed or denominated loan agreement, the agreement is not binding also in the remaining scope.
- (iii) If, in the performance of a credit agreement which is not binding due to the unfair nature of its provisions, the bank has disbursed to the borrower all or part of the amount of the credit and the borrower has made repayments of the credit, independent claims for repayment of the undue performance shall arise in favor of each party.
- (iv) If a credit agreement is not binding due to the unfair nature of its provisions, the statute of limitations of the bank's claim for repayment of amounts disbursed under the credit shall, as a rule, start to run from the day following the day on which the borrower challenges being bound by the provisions of agreement.
- (v) If a credit agreement is not binding due to the unfair nature of its provisions, there shall be no legal basis for any party to claim interest or other remuneration because of using party's pecuniary means during the period from the provision of undue benefit until the delay in the return of this benefit.

On 19 June 2024, the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 31/23) stating that:

The right of retention (Article 496 of the Civil Code) does not apply to the party that can set off its claim against the claim of the other party.

On 28 February 2025, the Supreme Court issued a resolution of 7 judges of the Supreme Court (III CZP 126/22), in which it stated that:

- (i) A bank loan agreement (Article 69(1) of the Banking Law Act of 29 August 1997) is a mutual agreement within the meaning of Article 487 § 2 of the Civil Code.

On 5 March 2025 the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 37/24), in which it stated that:

- (i) In the event of a claim for repayment from a bank of a consideration fulfilled on the basis of a credit agreement which has proved to be invalid, the bank is not entitled to the right of retention under Article 496 in connection with Article 497 of the Civil Code.

On May 15, 2025, the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 22/24), in which it indicated that:

- (i) Under the legal state in force until June 30, 2022, a request for a settlement attempt interrupted the limitation period of the claim, unless the circumstances of making this action indicate that it was not undertaken directly for the purpose of pursuing or determining, or satisfying or securing the claim (Article 123 § 1 point 1 of the Civil Code).

Due to the CJEU jurisprudence interpreting the causes and effects of invalidity of foreign currency mortgage loan agreements as well as above indicated resolution of the Civil Chamber of the Supreme Court, the area of interpretation of regulations by Polish courts in this respect appears to be limited. However, further jurisprudential practice of the Polish courts will play certain role in practical realisation of the CJEU's and the Supreme Court's guidance.





## 11. ADDITIONAL INFORMATION

### 11.1. DATA ABOUT ASSETS, WHICH SECURE LIABILITIES

As at 30.09.2025 (PLN'000):

No.	Type of assets	Portfolio	Secured liability	Par value of assets	Balance sheet value of assets
1.	Treasury Bonds PS0527	Held to maturity	Security of payment obligation to BFG contribution - guarantee fund	150 000	147 628
2.	Treasury Bonds DS0726	Held to maturity	Security of payment obligation to BFG contribution compulsory resolution fund	172 000	168 632
3.	Treasury Bonds PS0527	Held to maturity	financial and registered pledge on the Bank's account in the brokerage house	188 850	185 864
4.	Treasury Bonds PS0527	Held to maturity	financial pledge on the Bank's account in the brokerage house	583 659	574 429
5.	Treasury Bonds WZ1129	Held to maturity	pledge on the Bank's account related to a securitization transaction	102 000	102 191
6.	Treasury Bonds DS0727	Held to Collect and for Sale	pledge on the Bank's account related to a securitization transaction	565 000	550 570
7.	Treasury Bonds WZ0126	Held to maturity	pledge on the Millennium Leasing account related to a securitization transaction	275 000	277 248
8.	Cash	receivables	initial settlement deposit in KDPW CCP (MAGB)	15 000	15 000
9.	Cash	receivables	ASO guarantee fund (PAGB)	1 432	1 432
10.	Cash	receivables	appropriate security deposit at KDPW CCP (MATS)	2 027	2 027
11.	Cash	receivables	Settlement on transactions concluded	6 143	6 143
12.	Deposits placed	Deposits in banks	Settlement on transactions concluded	176 090	176 353
13.	Treasury Bonds WZ0330	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	30 000	29 168
14.	Treasury Bonds WZ0126	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	5 000	5 068
15.	Treasury Bonds WZ1129	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	15 000	14 914
16.	Treasury Bonds WZ1128	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	10 000	10 051
17.	Treasury Bonds WZ0528	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	10 000	10 093
18.	Treasury Bonds WZ1127	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	15 000	15 182
19.	Treasury Bonds WZ1131	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	35 000	34 180
20.	Mortgage loans*	Held to maturity	mortgage bonds Millennium Bank Hipoteczny	3 296 281	3 359 851
<b>TOTAL</b>				<b>5 653 482</b>	<b>5 686 021</b>

\* The carrying amount of the hedged liabilities (issued covered bonds) as at the reporting date amounted to PLN 1,604.996 thousand.

The Group presents, as a separate line item in the Consolidated Statement of Financial Position, assets pledged as collateral for liabilities that may be re-pledged or resold by the collateral taker. As at September 30, 2025, the Group had entered into short-term sale transactions with a repurchase agreement, involving treasury securities meeting the above criteria, with a carrying amount of PLN 132.978 thousand.

As at 31.12.2024 r. (PLN'000):

No.	Type of assets	Portfolio	Secured liability	Par value of assets	Balance sheet value of assets
1.	Treasury Bonds DS0727	Held to maturity	Securing the Fund for Protection of Funds Guaranteed as part of the Bank Guarantee Fund	267 000	247 461
2.	Treasury Bonds PS0527	Held to maturity	Security of payment obligation to BFG contribution - guarantee fund	142 000	139 128
3.	Treasury Bonds DS0726	Held to maturity	Security of payment obligation to BFG contribution compulsory resolution fund	150 000	144 743
4.	Treasury Bonds PS0425	Held to Collect and for Sale	pledge on the Bank's account related to a securitization transaction	550 000	545 358
5.	Treasury Bonds WZ0525	Held to Collect and for Sale	pledge on the Bank's account related to a securitization transaction	127 000	128 110
6.	Treasury Bonds PS0527	Held to maturity	financial and registered pledge on the Bank's account in the brokerage house	188 850	185 031
7.	Treasury Bonds PS0527	Held to maturity	financial pledge on the Bank's account in the brokerage house	583 659	571 855
8.	Treasury Bonds WZ0126	Held to maturity	pledge on the Millennium Leasing account related to a securitization transaction	311 835	321 623
9.	Cash	receivables	initial settlement deposit in KDPW CCP (MAGB)	11 000	11 000
10.	Cash	receivables	ASO guarantee fund (PAGB)	795	795
11.	Cash	receivables	appropriate security deposit at KDPW CCP (MATS)	321	321
12.	Cash	receivables	Settlement on transactions concluded	24 657	24 657
13.	Deposits placed	Deposits in banks	Settlement on transactions concluded	144 662	145 063
14.	Treasury Bonds WZ1127	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	15 000	14 960
15.	Treasury Bonds WZ0525	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	5 000	5 044
16.	Treasury Bonds WZ1129	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	15 000	14 657
17.	Treasury Bonds WZ0126	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	5 000	5 152
18.	Treasury Bonds WZ0528	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	10 000	9 955
19.	Treasury Bonds WZ1128	Held to Collect and for Sale	mortgage bonds Millennium Bank Hipoteczny	10 000	9 880
20.	Mortgage loans*	Held to maturity	mortgage bonds Millennium Bank Hipoteczny	1 673 857	1 707 557
<b>TOTAL</b>				<b>4 235 636</b>	<b>4 232 351</b>

\* The carrying amount of the hedged liabilities (issued covered bonds) as at the reporting date amounted to PLN 804,752 thousand

The Group presents, as a separate line item in the Consolidated Statement of Financial Position, assets pledged as collateral for liabilities that may be re-pledged or resold by the collateral taker. As at December 31, 2024, the Group had entered into short-term sale transactions with a repurchase agreement, involving treasury securities meeting the above criteria, with a carrying amount of PLN 194,088 thousand.

## 11.2. SECURITIES COVERED BY TRANSACTIONS WITH A BUY-BACK CLAUSE

Following securities (presented in the Group's balance-sheet) were underlying Sell-buy-back transactions (PLN'000):

As at 30.09.2025

Type of security	Par value	Balance sheet value
Treasury bonds	130 248	132 978
<b>TOTAL</b>	<b>130 248</b>	<b>132 978</b>

As at 31.12.2024

Type of security	Par value	Balance sheet value
Treasury bonds	194 346	194 088
<b>TOTAL</b>	<b>194 346</b>	<b>194 088</b>

In result of conclusion of Sell-Buy-Back transactions with the underlying securities presented in the table above, the Group is exposed to risks, which are the same as in case of holding securities with the same characteristics in its treasury portfolio.

### 11.3. 2024 DIVIDEND

Bank Millennium has a dividend policy of distribution between 35% and 50% of net profit, taking into account supervisory recommendations. Considering the position of the Commission on the dividend policy of commercial banks for 2025, formulated in the letter of the Polish Financial Supervision Authority dated 10 January 2025, the Bank's Management Board presented a proposal and the Annual General Meeting of the Bank, held on 27 March 2025, decided to allocate the entire profit generated in 2024 in the amount of PLN 643,103,011.05 to reserve capital.

### 11.4. EARNINGS PER SHARE

Profit per share calculated for 3 quarters 2025 (and diluted profit per share) on the basis of the consolidated data amounts to PLN 0.71.

### 11.5. SHAREHOLDERS HOLDING NO LESS THAN 5% OF THE TOTAL NUMBER OF VOTES AT THE GENERAL SHAREHOLDERS MEETING OF THE GROUP'S PARENT COMPANY – BANK MILLENNIUM S.A.

According to the information available to the Bank, with regard to shareholders holding over 5% of votes at the General Meeting, the Bank's shareholders are the following entities

Shareholder as at 30.09.2025	Number of shares	% share in share capital	Number of votes	% share in votes at Shareholders' Meeting
Banco Comercial Portugues S.A.	607 771 505	50.10	607 771 505	50.10
Nationale-Nederlanden Otwarty Fundusz Emerytalny	117 704 000	9.70	117 704 000	9.70
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

The data included in the table were collected in connection with the registration of shareholders entitled to participate in the Ordinary General Meeting of the Bank convened on March 27, 2025.

Shareholder as at 31.12.2024	Number of shares	% share in share capital	Number of votes	% share in votes at Shareholders' Meeting
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

## 11.6. INFORMATION ABOUT LOAN SURETIES OR GUARANTEES EXTENDED BY THE GROUP

In the IIIQ of 2025, the Group did not grant any sureties or guarantees for a loan or bank loan which would cause the Group's exposure on this account as at 30 September 2025 to be significant.

## 11.7. SEASONALITY AND BUSINESS CYCLES

In the Group's activity, there are no significant phenomena, which are cyclical or subject to seasonal variations.

## 11.8. OTHER ADDITIONAL INFORMATION AND EVENTS AFTER THE BALANCE SHEET DATE

### SALE OF TANGIBLES FIXED ASSETS

On June 18, the Bank sold a property located in Gdańsk. The net sale value amounted to PLN 31.2 million, while the net carrying amount of the property and related fixed assets at the time of sale was PLN 3.1 million.

### REFORM OF BENCHMARKS

#### WIBOR

In May 2022, the Polish government announced that WIBOR would be replaced by a different (lower) rate from 1 January 2023. In June 2022, a Working Group was established, including commercial banks, GPW Benchmark (Administrator of WIBOR), KNF.

In July 2022, the National Working Group on Reference Rate Reform (NWG) was established in connection with the planned reform of reference rates in Poland. The objective of the NGR's work to introduce a new interest rate benchmark and replace the currently used WIBOR index with it while ensuring the compliance with BMR, including in particular ensuring credibility, transparency and reliability in the development and application of the new benchmark.

The National Working Group involves representatives of the Ministry of Finance, the National Bank of Poland, the Office of the Financial Supervision Authority, the Bank Guarantee Fund, the Polish Development Fund, the Warsaw Stock Exchange, the National Depository for Securities, Bank Gospodarstwa Krajowego, the GPW Benchmark, as well as representatives of credit institutions, i.e. in particular, banks, financial institutions, including investment funds, insurance companies, factoring and leasing companies, entities that are bond issuers, including corporate and municipal bonds, clearing houses.

The work of the National Working Group is coordinated and supervised by a Steering Committee including representatives of key institutions: Financial Supervision Authority, the National Bank of Poland, the Ministry of Finance, the Bank Guarantee Fund, as well as the GPW Benchmark - the administrator of the reference rates, BondSpot S.A - and the Polish Bank Association (Polish: Związek Banków Polskich).

The NWG's activities are executed in a project formula, where project streams have been identified and where Bank Millennium representatives are actively contributing to the work.

The Bank uses the WIBOR reference rate in the following products (in PLN million as of 30 September 2025):

- mortgage loans: **17 575,53** mortgage loans based on WIBOR (excluding **13 439,27** mortgage loans currently with temporary fixed rate where the clients have the option to switch to variable rate indexed to WIBOR after the end of such temporary fixed rate initial period);
- loan products, factoring and corporate discounting products: **14 585,35**;
- debt instruments **14 814,18**;
  - Assets: 12 707,41
  - Liabilities: 2 106,77
- derivative instruments: **16 922,02**

The Bank also applies instruments based on WIBOR benchmarks in hedge accounting, details of the hedging relationships used by the Group, the items designated as hedged and hedging and the presentation of the result on these transactions are presented in Note 24 "Derivatives - Hedge accounting" in Chapter 13 "Notes to the Consolidated Financial Statements.

On March 28, 2025, the Steering Committee of the National Working Group approved the updated Roadmap for the process of replacing the WIBOR and WIBID reference rates and confirmed the final conversion date at the end of 2027. On June 2, 2025 official designation of the POLSTR (Polish Short Term Rate) Interest Rate Index and the indices from the POLSTR Composite Index Family has begun. As of September 1, 2025, POLSTR has obtained the status of a benchmark in accordance with the BMR Regulation.

The administrator of POLSTR is GPW Benchmark SA. In September 2025, the NGR Steering Committee (KS NGR) published updated NGR recommendations regarding the standards for applying the new target risk-free rate (RFR) index in new banking, leasing, and factoring products, as well as in financial instruments. Recommendations concerning legacy portfolios are currently under consultation.

For financial institutions, the key actions will include adapting IT systems, operational procedures, and legal frameworks related to the application of the target POLSTR index. In connection with this, Bank Millennium S.A. established, by resolution of the Bank's Management Board of 24 August 2022, an internal project reporting to the Management Board in order to duly manage the transition process of WIBOR to new index and to implement the work in accordance with the roadmap. This work involves representatives from a significant number of the Bank's business units, including, in particular, representatives responsible for product areas and risk management issues, including, in particular, interest rate risk and operational risk. The structure of the project includes the division into streams covering products and processes where the WIBOR benchmark is applied, the management of the project by a dedicated project manager and the periodical reporting of statuses on the individual streams.

At the current stage of the project, the Bank continuously monitors the work of the National Working Group and actively participates in the activities of individual workstreams. At the same time, appropriate project decisions are being made, and all developed recommendations are systematically incorporated into the Bank's initiatives.

Date	Name and surname	Position/Function	Signature
23.10.2025	Fernando Bicho	Deputy Chairman of the Management Board	Signed by a qualified electronic signature

**CONDENSED INTERIM STANDALONE FINANCIAL  
STATEMENTS OF THE BANK MILLENNIUM S.A.  
FOR THE 9 MONTHS ENDED 30 SEPTEMBER 2025**

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# 1. STANDALONE FINANCIAL DATA (BANK)

## STATEMENT OF PROFIT AND LOSS

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.07.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>	<b>1.07.2024 - 30.09.2024 restated data</b>
Net interest income	4 214 223	1 407 128	3 953 461	1 459 727
Interest income and other of similar nature	6 654 068	2 209 325	6 380 943	2 269 427
Income calculated using the effective interest method	6 565 199	2 179 601	6 266 027	2 236 512
Interest income from Financial assets at amortised cost, of which:	4 792 045	1 600 532	4 607 528	1 642 572
- the impact of the adjustment to the gross carrying amount of loans due to credit holidays	0	0	(145 346)	43 740
Interest income from Financial assets at fair value through other comprehensive income	1 773 154	579 069	1 658 499	593 940
Result of similar nature to interest from Financial assets at fair value through profit or loss	88 869	29 724	114 916	32 915
Interest expenses	(2 439 845)	(802 197)	(2 427 482)	(809 700)
Net fee and commission income	488 351	173 100	507 942	171 180
Fee and commission income	677 161	235 745	696 628	239 502
Fee and commission expenses	(188 810)	(62 645)	(188 686)	(68 322)
Dividend income	35 761	719	35 054	150
Result on derecognition of financial assets and liabilities not measured at fair value through profit or loss	4 403	3 999	319	(400)
Results on financial assets and liabilities held for trading	17 888	4 679	(4 121)	(1 888)
Result on non-trading financial assets mandatorily at fair value through profit or loss	54 923	242	4 973	4 073
Result on hedge accounting	2 849	3 299	201	1 657
Result on exchange differences	166 014	56 676	168 955	55 826
Other operating income	282 329	113 246	241 507	94 929
Other operating expenses	(256 353)	(80 760)	(249 364)	(62 623)
Administrative expenses	(1 673 034)	(552 702)	(1 437 614)	(478 618)
Impairment losses on financial assets	(151 888)	(91 705)	(277 597)	(104 240)
Impairment losses on non-financial assets	(12 103)	(10 353)	(4 353)	(2 257)
Legal risk expenses connected with FX mortgage loans, of which:	(1 569 996)	(484 609)	(2 130 523)	(697 688)
Provisions for legal risk	(1 503 209)	(484 609)	(1 656 390)	(532 800)
Result on modification	(2 743)	(511)	(1 882)	(445)
Depreciation	(164 605)	(54 520)	(164 352)	(56 610)
Banking tax	(300 612)	(100 794)	(133 512)	(98 990)
Profit before income taxes	<b>1 135 407</b>	<b>387 134</b>	<b>509 094</b>	<b>283 783</b>
Corporate income tax	(329 495)	(71 946)	(949)	(121 132)
Profit after taxes	<b>805 912</b>	<b>315 188</b>	<b>508 145</b>	<b>162 651</b>

**STATEMENT OF TOTAL COMPREHENSIVE INCOME**

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.07.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024</b>	<b>1.07.2024 - 30.09.2024</b>
Profit after taxes	805 912	315 188	508 145	162 651
Other comprehensive income items that may be (or were) reclassified to profit or loss	341 762	9 330	98 882	126 180
Result on debt securities	206 438	66 990	225 538	128 775
Result on credit portfolio designated for pooling to Mortgage Bank	118 540	(61 280)	(152 380)	(11 364)
Hedge accounting	16 784	3 620	25 724	8 769
Other comprehensive income items that will not be reclassified to profit or loss	0	0	0	0
Actuarial gains (losses)	0	0	0	0
Result on equity instruments	0	0	0	0
Total comprehensive income items before taxes	341 762	9 330	98 882	126 180
Corporate income tax on other comprehensive income items that may be (or were) reclassified to profit or loss	(64 935)	(1 773)	(18 788)	(23 974)
Corporate income tax on other comprehensive income items that will not be reclassified to profit or loss	0	0	0	0
Total comprehensive income items after taxes	<b>276 827</b>	<b>7 557</b>	<b>80 094</b>	<b>102 206</b>
Total comprehensive income for the period	1 082 739	322 745	588 239	264 857

## STATEMENT OF FINANCIAL POSITION

### ASSETS

<i>Amount '000 PLN</i>	<b>30.09.2025</b>	<b>31.12.2024 restated data</b>	<b>01.01.2024 restated data</b>
Cash, cash balances at central banks	4 940 600	5 178 984	5 094 984
Financial assets held for trading	1 416 231	1 006 791	620 814
Derivatives	191 514	257 094	498 577
Equity instruments	177	115	121
Debt securities, of which:	745 015	555 364	110 554
Securities underlying the sale and repurchase agreements	132 978	194 088	0
Reverse sale and repurchase agreements	479 525	194 218	11 562
Non-trading financial assets mandatorily at fair value through profit or loss, other than Loans and advances to customers	172 806	118 399	147 623
Equity instruments	151 581	66 609	66 609
Debt securities	21 225	51 790	81 014
Financial assets at fair value through other comprehensive income	39 547 317	29 023 647	21 924 652
Equity instruments	36 853	36 708	28 789
Debt securities	39 510 464	28 986 939	21 895 863
Loans and advances to customers	70 628 532	71 930 812	72 377 482
Mandatorily at fair value through profit or loss	815	1 825	19 349
Valued at fair value through other comprehensive income	9 609 638	11 135 416	11 799 748
Valued at amortised cost	61 018 079	60 793 571	60 558 385
Financial assets at amortised cost other than Loans and advances to customers	29 752 811	26 438 453	21 458 148
Debt securities	26 899 046	24 059 861	18 439 780
Deposits, loans and advances to banks and other monetary institutions	2 750 183	2 378 592	1 866 688
Reverse sale and repurchase agreements	103 582	0	1 151 680
Derivatives – Hedge accounting	0	0	15 069
Investments in subsidiaries, joint ventures and associates	610 476	517 214	399 223
Tangible fixed assets	524 433	518 145	517 333
Intangible fixed assets	597 957	537 425	464 922
Income tax assets	416 002	611 379	368 279
Current income tax assets	3 114	0	0
Deferred income tax assets	412 888	611 379	368 279
Other assets	1 807 751	1 620 941	1 360 160
Non-current assets and disposal groups classified as held for sale	0	0	0
<b>Total assets</b>	<b>150 414 916</b>	<b>137 502 190</b>	<b>124 748 689</b>

**LIABILITIES AND EQUITY**

<i>Amount '000 PLN</i>	<b>30.09.2025</b>	<b>31.12.2024 restated data</b>	<b>01.01.2024 restated data</b>
<b>LIABILITIES</b>			
Financial liabilities held for trading	761 097	417 518	579 331
Derivatives	262 683	226 749	576 611
Liabilities from short sale of securities	498 414	190 769	2 720
Financial liabilities measured at amortised cost	135 297 632	124 640 250	112 604 873
Liabilities to banks and other monetary institutions	200 553	210 931	506 240
Liabilities to customers	128 507 152	117 642 600	107 505 636
Sale and repurchase agreements	133 056	194 223	0
Debt securities issued	4 900 775	5 030 166	3 027 952
Subordinated debt	1 556 096	1 562 330	1 565 045
Derivatives – Hedge accounting	26 728	101 539	165 700
Provisions	3 597 457	2 947 927	1 489 400
Legal issues	3 452 592	2 846 010	1 401 798
Commitments and guarantees given	93 391	53 605	42 375
Retirement benefits	51 474	48 312	45 227
Income tax liabilities	0	215 590	460 456
Current income tax liabilities	0	215 590	460 456
Deferred income tax liabilities	0	0	0
Other liabilities	2 363 850	1 893 953	2 834 666
<b>Total Liabilities</b>	<b>142 046 764</b>	<b>130 216 777</b>	<b>118 134 426</b>
<b>EQUITY</b>			
Share capital	1 213 117	1 213 117	1 213 117
Own shares	(21)	(21)	(21)
Share premium	1 147 241	1 147 241	1 147 241
Accumulated other comprehensive income	165 532	(111 295)	(139 342)
Retained earnings	5 842 283	5 036 371	4 393 268
<b>Total equity</b>	<b>8 368 152</b>	<b>7 285 413</b>	<b>6 614 263</b>
<b>Total equity and total liabilities</b>	<b>150 414 916</b>	<b>137 502 190</b>	<b>124 748 689</b>

**STATEMENT OF CHANGES IN EQUITY**

<i>Amount '000 PLN</i>	<b>Total consolidated equity</b>	<b>Share capital</b>	<b>Own shares</b>	<b>Share premium</b>	<b>Accumulated other comprehensive income</b>	<b>Retained earnings</b>	
						<b>Unappropriated result</b>	<b>Other reserves</b>
<b>01.01.2025 – 30.09.2025</b>							
Equity at the beginning of the period	7 285 413	1 213 117	(21)	1 147 241	(111 295)	643 103	4 393 268
Total comprehensive income for period (net)	1 082 739	0	0	0	276 827	805 912	0
net profit/ (loss) of the period	805 912	0	0	0	0	805 912	0
other comprehensive income items after taxes	276 827	0	0	0	276 827	0	0
Transfer between items of reserves	0	0	0	0	0	(660 989)	660 989
Equity at the end of the period	8 368 152	1 213 117	(21)	1 147 241	165 532	788 026	5 054 257

<i>Amount '000 PLN</i>	<b>Total consolidated equity</b>	<b>Share capital</b>	<b>Own shares</b>	<b>Share premium</b>	<b>Accumulated other comprehensive income</b>	<b>Retained earnings</b>	
						<b>Unappropriated result</b>	<b>Other reserves</b>
<b>01.01.2025 – 31.12.2024</b>							
Equity at the beginning of the period	6 614 263	1 213 117	(21)	1 147 241	(139 342)	510 259	3 883 009
Total comprehensive income for period (net)	671 150	0	0	0	28 047	643 103	0
net profit/ (loss) of the period	643 103	0	0	0	0	643 103	0
other comprehensive income items after taxes	28 047	0	0	0	28 047	0	0
Transfer between items of reserves	0	0	0	0	0	(510 259)	510 259
Equity at the end of the period	7 285 413	1 213 117	(21)	1 147 241	(111 295)	643 103	4 393 268

<i>Amount '000 PLN</i>	<b>Total consolidated equity</b>	<b>Share capital</b>	<b>Own shares</b>	<b>Share premium</b>	<b>Accumulated other comprehensive income</b>	<b>Retained earnings</b>	
						<b>Unappropriated result</b>	<b>Other reserves</b>
<b>01.01.2024 – 30.09.2024</b>							
Equity at the beginning of the period	6 614 263	1 213 117	(21)	1 147 241	(139 342)	510 259	3 883 009
Total comprehensive income for period (net)	588 239	0	0	0	80 094	508 145	0
net profit/ (loss) of the period	508 145	0	0	0	0	508 145	0
other comprehensive income items after taxes	80 094	0	0	0	80 094	0	0
Transfer between items of reserves	0	0	0	0	0	(510 259)	510 259
Equity at the end of the period	7 202 502	1 213 117	(21)	1 147 241	(59 248)	508 145	4 393 268

## CASH FLOW STATEMENT

### A. CASH FLOWS FROM OPERATING ACTIVITIES

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>
Profit (loss) after taxes	805 912	508 145
Total adjustments:	12 743 459	6 595 509
Interest income/expense result (from the Profit and loss statement)	(4 214 223)	(3 953 461)
Interest received	6 486 801	6 205 951
Interest paid	(2 076 557)	(2 122 248)
Depreciation and amortization	164 606	164 352
Foreign exchange (gains)/ losses	(2 016)	(24 947)
Dividends	(35 761)	(35 054)
Changes in provisions	649 530	1 325 622
Result on sale and liquidation of investing activity assets	(26 361)	5 448
Change in financial assets held for trading	(152 078)	(116 163)
Change in loans and advances to banks	(412 004)	(129 987)
Change in loans and advances to customers	1 443 886	(1 318 249)
Change in receivables from securities bought with sell-back clause (loans and advances)	(388 889)	946 891
Change in financial liabilities valued at fair value through profit and loss (held for trading)	268 768	12 219
Change in deposits from banks	(11 209)	(278 699)
Change in deposits from customers	10 977 997	6 927 489
Change in liabilities from securities sold with buy-back clause	(61 167)	216 360
Change in debt securities issued	(18 006)	7 604
Income tax (from the Profit and loss statement)	329 495	950
Income tax paid	(414 643)	(574 768)
Change in other assets and liabilities	235 290	(663 801)
Net cash flows from operating activities	13 549 371	7 103 654

**B. CASH FLOWS FROM INVESTING ACTIVITIES**

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>
<b>Inflows:</b>	<b>419 914 052</b>	<b>439 073 589</b>
Proceeds from sale of property, plant and equipment and intangible assets	40 950	1 914
Proceeds from sale of shares in related entities	5 737	1 000
Proceeds from sale of investment financial assets	419 831 604	439 035 621
Other	35 761	35 054
<b>Outflows:</b>	<b>(431 557 435)</b>	<b>(451 755 406)</b>
Acquisition of property, plant and equipment and intangible assets	(196 908)	(174 296)
Acquisition of shares in related entities	(99 000)	(120 000)
Acquisition of investment financial assets	(431 261 527)	(451 461 110)
Other	0	0
<b>Net cash flows from investing activities</b>	<b>(11 643 383)</b>	<b>(12 681 817)</b>

**C. CASH FLOWS FROM FINANCING ACTIVITIES**

<i>Amount '000 PLN</i>	<b>1.01.2025 - 30.09.2025</b>	<b>1.01.2024 - 30.09.2024 restated data</b>
<b>Inflows from financing activities:</b>	<b>0</b>	<b>2 131 700</b>
Long-term bank loans	0	0
Issue of debt securities	0	2 131 700
Increase in subordinated debt	0	0
Net proceeds from issues of shares and additional capital paid-in	0	0
Other inflows from financing activities	0	0
<b>Outflows from financing activities:</b>	<b>(591 504)</b>	<b>(565 439)</b>
Repayment of long-term bank loans	0	0
Redemption of debt securities	(26 000)	(86 948)
Decrease in subordinated debt	0	0
Issue of shares expenses	0	0
Redemption of shares	0	0
Dividends paid and other payments to owners	0	0
Payments of lease liabilities	(65 451)	(69 179)
Other outflows from financing activities	(500 053)	(409 312)
<b>Net cash flows from financing activities</b>	<b>(591 504)</b>	<b>1 566 261</b>
<b>D. Net cash flows. Total (A + B + C)</b>	<b>1 314 484</b>	<b>(4 011 902)</b>
- of which change resulting from FX differences	(8 912)	(4 938)
<b>E. Cash and cash equivalents at the beginning of the reporting period</b>	<b>14 064 629</b>	<b>15 401 593</b>
<b>F. Cash and cash equivalents at the end of the reporting period (D + E)</b>	<b>15 379 113</b>	<b>11 389 691</b>

## 2. INTRODUCTION AND ACCOUNTING POLICY

These condensed interim financial statements have been prepared in accordance with International Accounting Standard IAS 34 Interim Financial Reporting as adopted by European Union. The condensed consolidated interim financial statement do not include all of the information which is presented in full annual financial statements, and should be read in conjunction with the financial statements of the Bank as at and for the year ended 31 December 2024. The accounting principles adopted in the preparation of this condensed interim separate financial statement are the same as those applied in the Bank's most recent annual financial statements for the year 2024 except for the tax charge, which, in accordance with the requirements of IAS 34, for the 3 quarters of 2025 was calculated based on the weighted average annual income tax rate (effective tax rate – ETR) that the Bank expects for the full financial year, and the changes in presentation described in this note.

Condensed interim financial statements of the Bank:

- are prepared on the basis of the assumption of business continuity by the Bank, namely scale of business is not to be reduced substantially in a period of not less than one year from the balance sheet date;
- have been prepared in PLN, and all values, unless otherwise indicated, are given in PLN rounded to one thousand.

In addition to financial data these condensed interim financial statements of the Bank also presents information and data that is important for appropriate assessment of the Bank's economic and financial situation and its financial performance, and which was not included in the condensed interim consolidated statements of the Group for the three and nine months periods ended 30 September 2025. Other information and explanations presented in the condensed interim consolidated financial statements of the Group for the three and nine months periods ended 30 September 2025 contain all important information, which also serves as explanatory data to these standalone statements of the Bank.

Between July / August 2022 and May / June 2024 the Bank executed a Recovery Plan and a Capital Protection Plan in order to improve its capital ratios that had been impacted by the significant costs of the so-called credit holidays for PLN mortgage borrowers in addition to the significant costs that were being incurred related to FX mortgage legal risk.

All key assumptions of both plans were achieved, including all defined indicators reached mandatory levels, and the Group's profitability and financial results were improved. In the area of capital management, capital ratios have been restored to levels exceeding minimum regulatory requirements and the Bank and the Group also met MREL requirements, including the combined buffer requirements.

As of 30 September 2025, the Tier 1 ratio was 523 bps (Bank) and 461 bps (Group) above the minimum requirement, and the Total Capital Ratio (TCR) was 500 bps (Bank) and 422 bps (Group) above the minimum requirement.

In terms of MREL<sub>trea</sub> and MREL<sub>tem</sub> requirements, the Group presents a surplus compared to the minimum required levels (including the Combined Buffer Requirement) as of 30 September 2025 (MREL<sub>trea</sub> surplus was 640 pb. and MREL<sub>tem</sub> surplus 292 pb). Assuming no extraordinary factors, the Group plans to maintain both MREL ratios above the minimum required levels with a safe surplus.

The liquidity position of Bank Millennium Group remained strong in 3Q 2025; LCR ratio reached the level of 374% at the end of September 2025, loan-to-deposit ratio remained low at 58% and the share of liquid debt securities in the Group's total assets remains significant at 44%.



The Bank monitors, on the current basis, the financial situation in particular, the Bank is aware of the risks associated with further negative developments regarding the legal risk of FX mortgage loans that could imply the need to increase the level of provisions for such risk beyond the provisions that were recognized as at the balance sheet date and whose amount results from previous trends. In the Bank's view, these events, if materialized, would adversely affect the results of the Bank/Group in future, and would reduce the organic generation of capital that is envisaged, but would not prevent the Bank/Group from continuing to implement its strategy and the generation of results that would mitigate the impact of such events.

Taking into account the above circumstances and identified risks and uncertainties, the Bank's Management Board based on the analysis of all aspects of the Bank's operations and its current and forecast financial position, concluded that the application of the going concern assumption in the preparation of these financial statements is appropriate.

The Management Board approved these condensed consolidated interim financial statements on 23<sup>rd</sup> October 2025.

### **New standards, interpretations and amendments to published standards**

In this interim condensed consolidated financial statement, the Bank has applied the following amendments to standards and interpretations that were endorsed by the European Union with an effective date for annual periods beginning on or after January 1, 2025:

<b>change</b>	<b>impact on the Group's financial statements</b>
Amendments to IAS 21 The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability	The amendment did not have a material impact on the financial statements

During the reporting period and up to the date of publication of these financial statements, the following accounting standards/amendments to standards were endorsed by the European Union.:

<b>change</b>	<b>impact on the Group's financial statements</b>
Contracts Referencing Nature-dependent Electricity: Amendments to IFRS 9 and IFRS 7	The Group estimates that the amendment will not have a material impact on the financial statements.
Amendments to the Classification and Measurement of Financial Instruments: Amendments to IFRS 9 and IFRS 7	The Group estimates that the amendment will not have a material impact on the financial statements.
Annual MSSF changes – version 11	The Group estimates that the amendment will not have a material impact on the financial statements.

## **Change in the presentation method in 2025 and the restatement of comparative data**

In this semi-annual financial condensed report for the IIIQ of 2025, compared to the report for the IIIQ of 2024 and the annual report for 2024, the Bank has introduced changes in the presentation of selected financial data in order to enhance the transparency of disclosures, better reflect the economic substance of the transactions concluded, and align with observed changes in market practice. The changes introduced had no impact on the net result for the 3- and 9-month periods ended September 30, 2024, nor on the value of equity as of December 31, 2024.

### **1) Changes to the Income Statement:**

a) A dedicated line item "Legal risk costs related to foreign currency mortgage loans" has been introduced. This item includes not only the costs of provisions previously presented under 'Provisions for legal risk related to foreign currency mortgage loans' and included amounts related to the recognized adjustment of the gross carrying amount of foreign currency loans as well as amounts recorded under the 'Provisions' line item, but also period costs related to settlements concluded on the Bank's terms (previously included in 'Net trading income'), costs of settlements concluded under KNF terms (previously presented as 'Modification result'), as well as legal representation costs and statutory interest (previously included in 'Other operating expenses');

b) The modification result related to non-significant modifications of exposures with recognized impairment has been reclassified to 'Impairment losses on financial assets', previously, this result was presented under 'Modification result';

c) Interest related to the receivables from repurchase agreement transactions, for which a change in presentation was made to trading assets (as described in Note 2e), was transferred from the item 'Interest income from Financial assets at amortised cost' to the item 'Result of similar nature to interest from Financial assets at fair value through profit or loss'.

### **2) Changes to the Statement of Financial Position:**

a) Within individual portfolios of financial assets, a separate line item 'Assets pledged as collateral' has been introduced. This item presents assets that may be pledged or sold by the collateral taker (in accordance with IFRS 9, such assets must be presented separately). This new item includes debt securities sold with a repurchase agreement clause under repo or sell-buy-back transactions;

b) Provisions for retirement benefits have been reclassified from "Other liabilities" to a separate line within the 'Provisions' section;

c) The values of variation margin deposits securing derivative transactions concluded via clearing houses have been offset against the valuation of derivatives;

d) Items 'Property, plant and equipment' and 'Intangible assets' were reduced by the amount of future expenditures, with a corresponding entry under 'Other liabilities' – costs payable;

e) A change in presentation was made for a part of receivables from repurchase transactions involving debt securities from the trading portfolio, from assets measured at amortised cost to financial assets held for trading.

### **3) Changes to the Statement of Cash Flows:**

a) The definition of cash equivalents has been revised in the case of securities issued by the State Treasury or the Central Bank. Previously, all such securities with a maturity of up to 3 months as at the balance sheet date were classified as cash equivalents. Now, only those securities that had a maturity of up to 3 months at the time of acquisition and were acquired for the purpose of covering short-term financial liabilities, are included;

b) A separate line item "Interest income/expense result (from the Profit and loss statement) has been introduced in the Cash flows from operating activities section. Previously, interest accrued during the reporting period was presented within changes in individual balance sheet items;

c) A separate line item 'Income tax (from the Profit and loss statement)' has been introduced and the amount presented under the line item 'Income tax paid' was adjusted accordingly;

d) Payments related to lease liabilities (principal portion) were presented under the line item 'Lease liability payments' in the Cash Flows from Financing Activities section; previously, these cash flows were presented under 'Change in amounts due to customers' in the Cash Flows from Operating Activities section;

e) Cash flows related to the issuance and repayment/redemption of financial liabilities arising from the issuance of debt securities were presented under Cash Flows from Financing Activities; previously, these cash flows were presented under Cash Flows from Operating Activities in the line item 'Change in liabilities from the issuance of debt securities'.

With a view to ensuring data comparability, all comparative data presented in this Bank's financial statement have been appropriately restated, as shown below in tabular form.

### Changes to the Statement of Profit or Loss:

Amount '000 PLN	01.01.2024 - 30.09.2024 data previously published	Change 1a)	Change 1b)	Change 1c)	01.01.2024 - 30.09.2024 restated data
Net interest income	3 953 461	0	0	0	3 953 461
Interest income and other of similar nature	6 380 943	0	0	0	6 380 943
Income calculated using the effective interest method	6 300 816	0	0	(34 789)	6 266 027
Interest income from Financial assets at amortised cost, of which:	4 642 317	0	0	(34 789)	4 607 528
- the impact of the adjustment to the gross carrying amount of loans due to credit holidays	(145 346)	0	0	0	(145 346)
Interest income from Financial assets at fair value through other comprehensive income	1 658 499	0	0	0	1 658 499
Result of similar nature to interest from Financial assets at fair value through profit or loss	80 127	0	0	34 789	114 916
Interest expenses	(2 427 482)	0	0	0	(2 427 482)
Net fee and commission income	507 942	0	0	0	507 942
Fee and commission income	696 628	0	0	0	696 628
Fee and commission expenses	(188 686)	0	0	0	(188 686)
Dividend income	35 054	0	0	0	35 054
Result on derecognition of financial assets and liabilities not measured at fair value through profit or loss	319	0	0	0	319
Results on financial assets and liabilities held for trading	(4 121)	0	0	0	(4 121)
Result on non-trading financial assets mandatorily at fair value through profit or loss	4 973	0	0	0	4 973
Result on hedge accounting	201	0	0	0	201
Result on exchange differences	(119 656)	288 611	0	0	168 955
Other operating income	241 507	0	0	0	241 507
Other operating expenses	(351 021)	101 657	0	0	(249 364)
Administrative expenses	(1 437 614)	0	0	0	(1 437 614)
Impairment losses on financial assets	(251 931)	0	(25 666)	0	(277 597)
Impairment losses on non-financial assets	(4 353)	0	0	0	(4 353)
Legal risk expenses connected with FX mortgage loans, of which:	(1 656 390)	(474 133)	0	0	(2 130 523)
Provisions for legal risk	(1 656 390)	0	0	0	(1 656 390)
Result on modification	(111 413)	83 865	25 666	0	(1 882)
Depreciation	(164 352)	0	0	0	(164 352)
Banking tax	(133 512)	0	0	0	(133 512)
Profit before income taxes	509 094	0	0	0	509 094
Corporate income tax	(949)	0	0	0	(949)
Profit after taxes	508 145	0	0	0	508 145

Amount '000 PLN	01.07.2024 - 30.09.2024 data previously published	Change 1a)	Change 1b)	Change 1c)	01.07.2024 - 30.09.2024 restated data
Net interest income	1 459 727	0	0	0	1 459 727
Interest income and other of similar nature	2 269 427	0	0	0	2 269 427
Income calculated using the effective interest method	2 246 935	0	0	(10 423)	2 236 512
Interest income from Financial assets at amortised cost, of which:	1 652 995	0	0	(10 423)	1 642 572
- the impact of the adjustment to the gross carrying amount of loans due to credit holidays	43 740	0	0	0	43 740
Interest income from Financial assets at fair value through other comprehensive income	593 940	0	0	0	593 940
Result of similar nature to interest from Financial assets at fair value through profit or loss	22 492	0	0	10 423	32 915
Interest expenses	(809 700)	0	0	0	(809 700)
Net fee and commission income	171 180	0	0	0	171 180
Fee and commission income	239 502	0	0	0	239 502
Fee and commission expenses	(68 322)	0	0	0	(68 322)
Dividend income	150	0	0	0	150
Result on derecognition of financial assets and liabilities not measured at fair value through profit or loss	(400)	0	0	0	(400)
Results on financial assets and liabilities held for trading	(1 888)	0	0	0	(1 888)
Result on non-trading financial assets mandatorily at fair value through profit or loss	4 073	0	0	0	4 073
Result on hedge accounting	1 657	0	0	0	1 657
Result on exchange differences	(32 775)	88 601	0	0	55 826
Other operating income	94 929	0	0	0	94 929
Other operating expenses	(97 299)	34 676	0	0	(62 623)
Administrative expenses	(478 618)	0	0	0	(478 618)
Impairment losses on financial assets	(96 720)	0	(7 520)	0	(104 240)
Impairment losses on non-financial assets	(2 257)	0	0	0	(2 257)
Legal risk expenses connected with FX mortgage loans, of which:	(532 800)	(164 888)	0	0	(697 688)
Provisions for legal risk	(532 800)	0	0	0	(532 800)
Result on modification	(49 576)	41 611	7 520	0	(445)
Depreciation	(56 610)	0	0	0	(56 610)
Banking tax	(98 990)	0	0	0	(98 990)
Profit before income taxes	283 783	0	0	0	283 783
Corporate income tax	(121 132)	0	0	0	(121 132)
Profit after taxes	162 651	0	0	0	162 651

**Changes to the Statement of Financial Position:**
**ASSETS**

Amount '000 PLN	2024-12-31 data previously published	Change 2a)	Change 2b)	Change 2c)	Change 2d)	Change 2e)	2024-12-31 restated data
Cash, cash balances at central banks	5 178 984	0	0	0	0	0	5 178 984
Financial assets held for trading	812 573	0	0	0	0	194 218	1 006 791
Derivatives	257 094	0	0	0	0	0	257 094
Equity instruments	115	0	0	0	0	0	115
Debt securities, of which:	555 364	0	0	0	0	0	555 364
Securities underlying the sale and repurchase agreements	0	194 088	0	0	0	0	194 088
Reverse sale and repurchase agreements	0	0	0	0	0	194 218	194 218
Non-trading financial assets mandatorily at fair value through profit or loss, other than Loans and advances to customers	118 399	0	0	0	0	0	118 399
Equity instruments	66 609	0	0	0	0	0	66 609
Debt securities	51 790	0	0	0	0	0	51 790
Financial assets at fair value through other comprehensive income	29 023 647	0	0	0	0	0	29 023 647
Equity instruments	36 708	0	0	0	0	0	36 708
Debt securities	28 986 939	0	0	0	0	0	28 986 939
Loans and advances to customers	71 936 712	0	0	(5 900)	0	0	71 930 812
Mandatorily at fair value through profit or loss	1 825	0	0	0	0	0	1 825
Valued at fair value through other comprehensive income	11 135 416	0	0	0	0	0	11 135 416
Valued at amortised cost	60 799 471	0	0	(5 900)	0	0	60 793 571
Financial assets at amortised cost other than Loans and advances to customers	26 632 671	0	0	0	0	(194 218)	26 438 453
Debt securities	24 059 861	0	0	0	0	0	24 059 861
Deposits, loans and advances to banks and other monetary institutions	2 378 592	0	0	0	0	0	2 378 592
Reverse sale and repurchase agreements	194 218	0	0	0	0	(194 218)	0
Derivatives – Hedge accounting	112 365	0	0	(112 365)	0	0	0
Investments in subsidiaries, joint ventures and associates	517 214	0	0	0	0	0	517 214
Tangible fixed assets	574 660	0	0	0	(56 515)	0	518 145
Intangible fixed assets	560 317	0	0	0	(22 892)	0	537 425
Income tax assets	611 379	0	0	0	0	0	611 379
Current income tax assets	0	0	0	0	0	0	0
Deferred income tax assets	611 379	0	0	0	0	0	611 379
Other assets	1 620 941	0	0	0	0	0	1 620 941
Non-current assets and disposal groups classified as held for sale	0	0	0	0	0	0	0
<b>Total assets</b>	<b>137 699 862</b>	<b>0</b>	<b>0</b>	<b>(118 265)</b>	<b>(79 407)</b>	<b>0</b>	<b>137 502 190</b>

**LIABILITIES AND EQUITY**

Amount '000 PLN	2024-12-31 data previously published	Change 2a)	Change 2b)	Change 2c)	Change 2d)	Change 2e)	2024-12-31 restated data
<b>LIABILITIES</b>							
Financial liabilities held for trading	417 518	0	0	0	0	0	417 518
Derivatives	226 749	0	0	0	0	0	226 749
Liabilities from short sale of securities	190 769	0	0	0	0	0	190 769
Financial liabilities measured at amortised cost	124 752 615	0	0	(112 365)	0	0	124 640 250
Liabilities to banks and other monetary institutions	323 296	0	0	(112 365)	0	0	210 931
Liabilities to customers	117 642 600	0	0	0	0	0	117 642 600
Sale and repurchase agreements	194 223	0	0	0	0	0	194 223
Debt securities issued	5 030 166	0	0	0	0	0	5 030 166
Subordinated debt	1 562 330	0	0	0	0	0	1 562 330
Derivatives – Hedge accounting	107 439	0	0	(5 900)	0	0	101 539
Provisions	2 899 615	0	48 312	0	0	0	2 947 927
Pending legal issues	2 846 010	0	0	0	0	0	2 846 010
Commitments and guarantees given	53 605	0	0	0	0	0	53 605
Retirement benefits	0	0	48 312	0	0	0	48 312
Income tax liabilities	215 590	0	0	0	0	0	215 590
Current income tax liabilities	215 590	0	0	0	0	0	215 590
Deferred income tax liabilities	0	0	0	0	0	0	0
Other liabilities	2 021 672	0	(48 312)	0	(79 407)	0	1 893 953
<b>Total Liabilities</b>	<b>130 414 449</b>	<b>0</b>	<b>0</b>	<b>(118 265)</b>	<b>(79 407)</b>	<b>0</b>	<b>130 216 777</b>
<b>EQUITY</b>							
Share capital	1 213 117	0	0	0	0	0	1 213 117
Own shares	(21)	0	0	0	0	0	(21)
Share premium	1 147 241	0	0	0	0	0	1 147 241
Accumulated other comprehensive income	(111 295)	0	0	0	0	0	(111 295)
Retained earnings	5 036 371	0	0	0	0	0	5 036 371
<b>Total equity</b>	<b>7 285 413</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7 285 413</b>
<b>Total equity and total liabilities</b>	<b>137 699 862</b>	<b>0</b>	<b>0</b>	<b>(118 265)</b>	<b>(79 407)</b>	<b>0</b>	<b>137 502 190</b>

**ASSETS**

Amount '000 PLN	2023-12-31 data previously published	Change 2a)	Change 2b)	Change 2c)	Change 2d)	Change 2e)	2023-12-31 restated data
Cash, cash balances at central banks	5 094 984	0	0	0	0	0	5 094 984
Financial assets held for trading	609 252	0	0	0	0	11 562	620 814
Derivatives	498 577	0	0	0	0	0	498 577
Equity instruments	121	0	0	0	0	0	121
Debt securities, of which:	110 554	0	0	0	0	0	110 554
Securities underlying the sale and repurchase agreements	0	0	0	0	0	0	0
Reverse sale and repurchase agreements	0	0	0	0	0	11 562	11 562
Non-trading financial assets mandatorily at fair value through profit or loss, other than Loans and advances to customers	147 623	0	0	0	0	0	147 623
Equity instruments	66 609	0	0	0	0	0	66 609
Debt securities	81 014	0	0	0	0	0	81 014
Financial assets at fair value through other comprehensive income	21 924 652	0	0	0	0	0	21 924 652
Equity instruments	28 789	0	0	0	0	0	28 789
Debt securities	21 895 863	0	0	0	0	0	21 895 863
Loans and advances to customers	72 405 446	0	0	(27 964)	0	0	72 377 482
Mandatorily at fair value through profit or loss	19 349	0	0	0	0	0	19 349
Valued at fair value through other comprehensive income	11 799 748	0	0	0	0	0	11 799 748
Valued at amortised cost	60 586 349	0	0	(27 964)	0	0	60 558 385
Financial assets at amortised cost other than Loans and advances to customers	21 469 710	0	0	0	0	(11 562)	21 458 148
Debt securities	18 439 780	0	0	0	0	0	18 439 780
Deposits, loans and advances to banks and other monetary institutions	1 866 688	0	0	0	0	0	1 866 688
Reverse sale and repurchase agreements	1 163 242	0	0	0	0	(11 562)	1 151 680
Derivatives – Hedge accounting	74 213	0	0	(59 144)	0	0	15 069
Investments in subsidiaries, joint ventures and associates	399 223	0	0	0	0	0	399 223
Tangible fixed assets	553 087	0	0	0	(35 754)	0	517 333
Intangible fixed assets	481 128	0	0	0	(16 206)	0	464 922
Income tax assets	368 279	0	0	0	0	0	368 279
Current income tax assets	0	0	0	0	0	0	0
Deferred income tax assets	368 279	0	0	0	0	0	368 279
Other assets	1 360 160	0	0	0	0	0	1 360 160
Non-current assets and disposal groups classified as held for sale	0	0	0	0	0	0	0
<b>Total assets</b>	<b>124 887 757</b>	<b>0</b>	<b>0</b>	<b>(87 108)</b>	<b>(51 960)</b>	<b>0</b>	<b>124 748 689</b>

**LIABILITIES AND EQUITY**

<i>Amount '000 PLN</i>	2023-12-31 data previously published	Change 2a)	Change 2b)	Change 2c)	Change 2d)	Change 2e)	2023-12-31 restated data
<b>LIABILITIES</b>							
Financial liabilities held for trading	579 331	0	0	0	0	0	579 331
Derivatives	576 611	0	0	0	0	0	576 611
Liabilities from short sale of securities	2 720	0	0	0	0	0	2 720
Financial liabilities measured at amortised cost	112 664 017	0	0	(59 144)	0	0	112 604 873
Liabilities to banks and other monetary institutions	565 384	0	0	(59 144)	0	0	506 240
Liabilities to customers	107 505 636	0	0	0	0	0	107 505 636
Sale and repurchase agreements	0	0	0	0	0	0	0
Debt securities issued	3 027 952	0	0	0	0	0	3 027 952
Subordinated debt	1 565 045	0	0	0	0	0	1 565 045
Derivatives – Hedge accounting	193 664	0	0	(27 964)	0	0	165 700
Provisions	1 444 173	0	45 227	0	0	0	1 489 400
Pending legal issues	1 401 798	0	0	0	0	0	1 401 798
Commitments and guarantees given	42 375	0	0	0	0	0	42 375
Retirement benefits	0	0	45 227	0	0	0	45 227
Income tax liabilities	460 456	0	0	0	0	0	460 456
Current income tax liabilities	460 456	0	0	0	0	0	460 456
Deferred income tax liabilities	0	0	0	0	0	0	0
Other liabilities	2 931 853	0	(45 227)	0	(51 960)	0	2 834 666
<b>Total Liabilities</b>	<b>118 273 494</b>	<b>0</b>	<b>0</b>	<b>(87 108)</b>	<b>(51 960)</b>	<b>0</b>	<b>118 134 426</b>
<b>EQUITY</b>							
Share capital	1 213 117	0	0	0	0	0	1 213 117
Own shares	(21)	0	0	0	0	0	(21)
Share premium	1 147 241	0	0	0	0	0	1 147 241
Accumulated other comprehensive income	(139 342)	0	0	0	0	0	(139 342)
Retained earnings	4 393 268	0	0	0	0	0	4 393 268
<b>Total equity</b>	<b>6 614 263</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6 614 263</b>
<b>Total equity and total liabilities</b>	<b>124 887 757</b>	<b>0</b>	<b>0</b>	<b>(87 108)</b>	<b>(51 960)</b>	<b>0</b>	<b>124 748 689</b>



## Changes to the Statement of Cash Flows

### A. CASH FLOWS FROM OPERATING ACTIVITIES

Amount '000 PLN	1.01.2024 - 30.09.2024 data previously published	Change 3a)	Change 3b)	Change 3c)	Change 3d)	Change 3e)	Adjustments resulting from changes in the statement of financial position	1.01.2024 - 30.09.2024 restated data
Profit (loss) after taxes	508 145	0	0	0	0	0	0	508 145
Total adjustments:	7 787 151	2 790	(1 701 052)	0	69 179	396 626	40 815	6 595 509
Interest income/expense result (from the Profit and loss statement)	0	0	(3 953 461)	0	0	0	0	(3 953 461)
Interest received	6 042 262	0	163 689	0	0	0	0	6 205 951
Interest paid	(2 431 926)	0	0	0	0	309 678	0	(2 122 248)
Depreciation and amortization	164 352	0	0	0	0	0	0	164 352
Foreign exchange (gains)/ losses	0	0	0	0	0	(24 947)	0	(24 947)
Dividends	(35 054)	0	0	0	0	0	0	(35 054)
Changes in provisions	1 326 138	0	0	0	0	0	(516)	1 325 622
Result on sale and liquidation of investing activity assets	5 448	0	0	0	0	0	0	5 448
Change in financial assets held for trading	(196 724)	2 790	66 886	0	0	0	10 885	(116 163)
Change in loans and advances to banks	(212 453)	0	82 466	0	0	0	0	(129 987)
Change in loans and advances to customers	(5 629 867)	0	4 321 555	0	0	0	(9 937)	(1 318 249)
Change in receivables from securities bought with sell-back clause (loans and advances)	912 102	0	34 789	0	0	0	0	946 891
Change in financial liabilities valued at fair value through profit and loss (held for trading)	2 282	0	0	0	0	0	9 937	12 219
Change in deposits from banks	(256 552)	0	(11 262)	0	0	0	(10 885)	(278 699)
Change in deposits from customers	8 884 474	0	(2 026 164)	0	69 179	0	0	6 927 489
Change in liabilities from securities sold with buy-back clause	243 550	0	(27 190)	0	0	0	0	216 360
Change in debt securities issued	153 965	0	(258 256)	0	0	111 895	0	7 604
Change in the balance of income tax-related receivables and payables	(401 714)	0	0	401 714	0	0	0	0
Income tax (from the Profit and loss statement)	0	0	0	950	0	0	0	950
Income tax paid	(164 368)	0	0	(410 400)	0	0	0	(574 768)
Change in the balance of other assets and liabilities	(712 868)	0	0	7 736	0	0	41 331	(663 801)
Change in other items	94 104	0	(94 104)	0	0	0	0	0
Net cash flows from operating activities	8 295 296	2 790	(1 701 052)	0	69 179	396 626	40 815	7 103 654

### B. CASH FLOWS FROM INVESTING ACTIVITIES

Amount '000 PLN	1.01.2024 - 30.09.2024 data previously published	Change 3a)	Change 3b)	Change 3c)	Change 3d)	Change 3e)	Adjustments resulting from changes in the statement of financial position	1.01.2024 - 30.09.2024 restated data
Inflows:	439 073 589	0	0	0	0	0	0	439 073 589
Proceeds from sale of property, plant and equipment and intangible assets	1 914	0	0	0	0	0	0	1 914
Proceeds from sale of shares in related entities	1 000	0	0	0	0	0	0	1 000
Proceeds from sale of investment financial assets	439 035 621	0	0	0	0	0	0	439 035 621
Other	35 054	0	0	0	0	0	0	35 054
Outflows:	(454 282 781)	867 138	1 701 052	0	0	0	(40 815)	(451 755 406)
Acquisition of property, plant and equipment and intangible assets	(133 481)	0	0	0	0	0	(40 815)	(174 296)
Acquisition of shares in related entities	(120 000)	0	0	0	0	0	0	(120 000)
Acquisition of investment financial assets	(454 029 300)	867 138	1 701 052	0	0	0	0	(451 461 110)
Other	0	0	0	0	0	0	0	0
Net cash flows from investing activities	(15 209 192)	867 138	1 701 052	0	0	0	(40 815)	(12 681 817)

**C. CASH FLOWS FROM FINANCING ACTIVITIES**

<i>Amount '000 PLN</i>	1.01.2024 - 30.09.2024 data previously published	Change 3a)	Change 3b)	Change 3c)	Change 3d)	Change 3e)	Adjustments resulting from changes in the statement of financial position	1.01.2024 - 30.09.2024 restated data
Inflows from financing activities:	2 131 700	0	0	0	0	0	0	2 131 700
Long-term bank loans	0	0	0	0	0	0	0	0
Issue of debt securities	2 131 700	0	0	0	0	0	0	2 131 700
Increase in subordinated debt	0	0	0	0	0	0	0	0
Net proceeds from issues of shares and additional capital paid-in	0	0	0	0	0	0	0	0
Other inflows from financing activities	0	0	0	0	0	0	0	0
Outflows from financing activities:	(99 634)	0	0	0	(69 179)	(396 626)	0	(565 439)
Repayment of long-term bank loans	0	0	0	0	0	0	0	0
Redemption of debt securities	0	0	0	0	0	(86 948)	0	(86 948)
Decrease in subordinated debt	0	0	0	0	0	0	0	0
Issue of shares expenses	0	0	0	0	0	0	0	0
Redemption of shares	0	0	0	0	0	0	0	0
Dividends paid and other payments to owners	0	0	0	0	0	0	0	0
Payments of lease liabilities	0	0	0	0	(69 179)	0	0	(69 179)
Other outflows from financing activities	(99 634)	0	0	0	0	(309 678)	0	(409 312)
Net cash flows from financing activities	2 032 066	0	0	0	(69 179)	(396 626)	0	1 566 261
D. Net cash flows. Total (A + B + C)	(4 881 830)	869 928	0	0	0	0	0	(4 011 902)
- of which change resulting from FX differences	(4 938)	0	0	0	0	0	0	(4 938)
E. Cash and cash equivalents at the beginning of the reporting period	18 396 413	(2 994 820)	0	0	0	0	0	15 401 593
F. Cash and cash equivalents at the end of the reporting period (D + E)	13 514 583	(2 124 892)	0	0	0	0	0	11 389 691

### 3. SUPPLEMENTARY INFORMATION FOR STANDALONE FINANCIAL DATA

#### Sale of tangibles fixed assets

On June 18, the Bank sold a property located in Gdańsk. The net sale value amounted to PLN 31.2 million, while the net carrying amount of the property and related fixed assets at the time of sale was PLN 3.1 million.

#### Impairment losses on financial assets

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Impairment losses on loans and advances to customers	(112 000)	(51 878)	(285 617)	(109 973)
Impairment charges on loans and advances to customers	(849 789)	(216 438)	(1 077 992)	(293 493)
Reversal of impairment charges on loans and advances to customers	637 220	158 864	747 873	183 310
Amounts recovered from loans written off	23 647	6 426	24 947	7 731
Sale of receivables	67 413	(19 017)	45 221	0
Other directly recognised in profit and loss	9 509	18 287	(25 666)	(7 521)
Impairment losses on securities	(8)	0	(1)	4
Impairment charges on securities	(8)	0	(1)	4
Reversal of impairment charges on securities	0	0	0	0
Impairment losses on off-balance sheet liabilities	(39 880)	(39 827)	8 021	5 728
Impairment charges on off-balance sheet liabilities	(88 789)	(50 682)	(32 133)	(4 653)
Reversal of impairment charges on off-balance sheet liabilities	48 909	10 855	40 154	10 381
<b>Total</b>	<b>(151 888)</b>	<b>(91 705)</b>	<b>(277 597)</b>	<b>(104 241)</b>

#### Movements in impairment allowances for loans and advances to customers carried at amortised cost

	01.01.2025 – 30.09.2025	01.01.2024 – 31.12.2024
Balance at the beginning of the period	2 298 327	2 299 364
Change in value of provisions:	(2 843)	(1 037)
Impairment allowances created in the period	803 641	1 229 349
Amounts written off	(64 970)	(218 506)
Impairment allowances released in the period	(594 953)	(831 022)
Sale of receivables	(179 029)	(247 429)
KOIM created in the period(*)	49 253	69 359
Changes resulting from FX rates differences	(466)	(5 260)
Other	(16 319)	2 472
<b>Balance at the end of the period</b>	<b>2 295 484</b>	<b>2 298 327</b>

\* In accordance with IFRS 9, the Bank calculates interest on the loan portfolio with a recognized impairment based on the net exposure value. For this purpose, the so-called impaired interest adjustment ("KOIM") is calculated and recorded as a reduction of interest income. Aforementioned KOIM adjustment in the balance sheet is presented as an impairment allowances, and as a consequence the reconciliation of the change in impairment allowances requires consideration of the KOIM recognized in the interest income.

**Change of Provision for commitments and guarantees given**

<b>01.01.2025 – 30.09.2025</b>	<b>Total</b>	<b>Stage 1</b>	<b>Stage 2</b>	<b>Stage 3</b>
Balance at the beginning of the period	53 605	30 327	16 613	6 665
Charge of provision	88 789	39 739	40 698	8 352
Release of provision	(48 908)	(36 974)	(7 930)	(4 004)
Movement between stages	0	13 461	(12 763)	(698)
FX rates differences	(95)	(4)	(7)	(84)
Balance at the end of the period	93 391	46 549	36 611	10 231

<b>01.01.2024 – 31.12.2024</b>	<b>Total</b>	<b>Stage 1</b>	<b>Stage 2</b>	<b>Stage 3</b>
Balance at the beginning of the period	42 375	21 620	10 127	10 628
Charge of provision	52 302	21 043	26 166	5 093
Release of provision	(40 993)	(27 432)	(5 749)	(7 812)
Movement between stages	0	15 180	(13 933)	(1 247)
FX rates differences	(79)	(84)	2	3
Balance at the end of the period	53 605	30 327	16 613	6 665

**Change of Provision for legal issues**

	<b>01.01.2025 – 30.09.2025</b>	<b>01.01.2024 – 31.12.2024</b>
Balance at the beginning of the period	2 846 010	1 401 798
Creation of provision for legal risk connected with FX mortgage loans	1 425 862	1 857 142
Charge of provision for other legal issues	92 664	13 553
Release of provision	(9 523)	(8 872)
Utilisation of provision	(904 602)	(420 111)
Reclassification	2 181	2 500
Balance at the end of the period	<b>3 452 592</b>	<b>2 846 010</b>

**Change of Provision for Retirement benefits**

	<b>01.01.2025 – 30.09.2025</b>	<b>01.01.2024 – 31.12.2024</b>
Balance at the beginning of the period	48 312	45 227
Charge/Release of provision	4 500	5 816
Utilization of provisions	(1 338)	(1 400)
Actuarial gains/losses	0	(1 331)
Inne	51 474	48 312
Balance at the end of the period	48 312	45 227

**Legal risk costs related to foreign currency mortgage loans**

	1.01.2025 - 30.09.2025	1.07.2025 - 30.09.2025	1.01.2024 - 30.09.2024	1.07.2024 - 30.09.2024
Costs of provisions for legal risk related with FX mortgage loans	(1 503 209)	(484 609)	(1 656 390)	(532 800)
Other costs	(66 787)	0	(474 133)	(164 887)
<b>Total</b>	<b>(1 569 996)</b>	<b>(484 609)</b>	<b>(2 130 523)</b>	<b>(697 687)</b>

In the first half of 2025, the Bank introduced changes to the presentation of financial data, among others in the area of legal risk costs related to foreign currency mortgage loans. Details of these changes are presented in Chapter 2. INTRODUCTION AND ACCOUNTING POLICIES – Changes in data presentation implemented in 2025, item 1) a.

**Costs of provisions for legal risk related with FX mortgage loans**

01.01.2025 – 30.09.2025	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	8 463 696	5 665 224	2 798 472
Utilization of provisions during the period	(2 197 186)	(1 304 823)	(892 363)
Costs of provisions for legal risk connected with FX mortgage loans	1 503 209	77 346	1 425 862
Change of provisions due to FX rates differences	36 161	36 161	0
<b>Balance at the end of the period</b>	<b>7 805 881</b>	<b>4 473 909</b>	<b>3 331 971</b>

01.07.2025 – 30.09.2025	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	8 168 994	4 819 527	3 349 467
Utilization of provisions during the period	(886 725)	(507 221)	(379 504)
Costs of provisions for legal risk connected with FX mortgage loans	484 609	122 600	362 009
Change of provisions due to FX rates differences	39 003	39 003	0
<b>Balance at the end of the period</b>	<b>7 805 881</b>	<b>4 473 909</b>	<b>3 331 971</b>

01.01.2024 – 30.09.2024	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	7 871 789	6 516 460	1 355 329
Utilization of provisions during the period	(886 986)	(636 345)	(250 641)
Costs of provisions for legal risk connected with FX mortgage loans	1 656 390	71 473	1 584 917
Change of provisions due to FX rates differences	(217 793)	(217 793)	0
<b>Balance at the end of the period</b>	<b>8 423 401</b>	<b>5 733 795</b>	<b>2 689 606</b>

01.07.2024 - 30.09.2024	TOTAL	Decreasing gross value of credit portfolio	Provisions for legal issues
Balance at the beginning of the period	8 206 595	6 030 633	2 175 962
Utilization of provisions during the period	(386 242)	(261 835)	(124 407)
Costs of provisions for legal risk connected with FX mortgage loans	532 800	(105 251)	638 051
Change of provisions due to FX rates differences	70 247	70 247	0
<b>Balance at the end of the period</b>	<b>8 423 401</b>	<b>5 733 795</b>	<b>2 689 606</b>

## 4. TRANSACTIONS WITH RELATED ENTITIES

All transactions among members of the Group made during 3 quarters 2025 and 2024 were driven by current activity. The below table presents major amounts of intergroup transactions, these were transactions with the following entities:

- MILLENNIUM BANK HIPOTECZNY,
- MILLENNIUM LEASING,
- MILLENNIUM CONSULTING
- MILLENNIUM TFI
- MILLENNIUM SERVICE,
- MILLENNIUM TELECOMMUNICATION SERVICES,
- MILLENNIUM GOODIE.

and with the Capital Group of Bank parent company - Banco Comercial Portugues (ultimate parent company), these transactions are mainly of banking nature.

Apart from transactions described herein, in the indicated period neither Bank Millennium S.A., nor subsidiaries of Bank Millennium S.A. made any other transactions with related entities, which individually or jointly may have been significant and concluded under terms and conditions other than market-based.

Assets and liabilities from transactions with related parties (data in '000 pln) as at 30.09.2025

	With subsidiaries	With parent company	With other entities from parent group
<b>ASSETS</b>			
Loans and advances to banks – accounts and deposits	2 251 080	7 468	0
Loans and advances to customers	7 012 909	0	0
Investments in associates	558 976	0	0
Financial assets valued at fair value through profit and loss (held for trading)	1 558	0	0
Hedging derivatives	0	0	0
Other assets	16 894	0	0
<b>LIABILITIES</b>			
Deposits from banks	7 879	83	0
Deposits from customers	321 607	0	0
Liabilities from securities sold with buy-back clause	0	0	0
Liabilities arising from debt securities	0	0	0
Financial liabilities valued at fair value through profit and loss (held for trading)	135	0	0
Subordinated debt	0	0	0
Other liabilities, including:	26 863	374	27
- financial leasing liabilities	18 355	0	0

Assets and liabilities from transactions with related parties (data in '000 pln) as at 31.12.2024

	With subsidiaries	With parent company	With other entities from parent group
<b>ASSETS</b>			
Loans and advances to banks – accounts and deposits	1 944 076	1 788	0
Loans and advances to customers	6 863 794	0	0
Investments in associates	465 714	0	0
Financial assets valued at fair value through profit and loss (held for trading)	1 249	0	0
Hedging derivatives	0	0	0
Other assets	17 835	0	0
<b>LIABILITIES</b>			
Deposits from banks	6 803	121	0
Deposits from customers	385 388	0	0
Liabilities from securities sold with buy-back clause	0	0	0
Liabilities arising from debt securities	0	0	0
Financial liabilities valued at fair value through profit and loss (held for trading)	652	0	0
Subordinated debt	0	0	0
Other liabilities, including:	33 908	234	14
- financial leasing liabilities	27 074	0	0

Profit and loss on transactions with related parties (data in '000 pln) for the period 1.01-30.09.2025

	With subsidiaries	With parent company	With other entities from parent group
<b>Income from:</b>			
Interest	355 489	1 122	0
Commissions	29 422	203	0
Financial instruments valued at fair value through profit and loss	824	0	0
Dividends	31 495	0	0
Other net operating	30 694	0	0
<b>Expense from:</b>			
Interest	11 404	0	0
Commissions	1	0	0
Financial instruments valued at fair value through profit and loss	0	0	0
Other net operating	0	0	0
General and administrative expenses	13 362	140	45

**Profit and loss on transactions with related parties (data in '000 pln) for the period 1.01-30.09.2024**

	<b>With subsidiaries</b>	<b>With parent company</b>	<b>With other entities from parent group</b>
Income from:			
Interest	340 348	4 939	0
Commissions	23 173	155	0
Financial instruments valued at fair value through profit and loss	2 677	2 552	0
Dividends	26 618	0	0
Other net operating	14 764	0	0
Expense from:			
Interest	8 240	0	0
Commissions	3	0	0
Financial instruments valued at fair value through profit and loss	0	0	0
Other net operating	0	0	0
General and administrative expenses	12 487	138	0

**Off-balance transactions with related parties (data in '000 pln) as at na 30.09.2025**

	<b>With subsidiaries</b>	<b>With parent company</b>	<b>With other entities from parent group</b>
Conditional commitments	2 821 029	43 710	0
granted	2 503 031	0	0
obtained	317 998	43 710	0
Derivatives (par value)	221 708	0	0

**Off-balance transactions with related parties (data in '000 pln) as at 31.12.2024**

	<b>With subsidiaries</b>	<b>With parent company</b>	<b>With other entities from parent group</b>
Conditional commitments	1 744 559	24 680	0
granted	1 428 155	0	0
obtained	316 404	24 680	0
Derivatives (par value)	180 379	0	0



## 5. FAIR VALUE

The methodology used by the Bank for valuation of assets and liabilities at fair value is described in detail in Chapter 8. Condensed interim consolidated financial statements of Bank Millennium S.A. for the 9 months ended 30 September 2025

The following tables show the figures for Bank Millennium S.A.

### 5.1. FINANCIAL INSTRUMENTS NOT RECOGNIZED AT FAIR VALUE IN THE BALANCE SHEET

30.09.2025	Balance sheet value	Fair value
ASSETS MEASURED AT AMORTISED COST		
Debt securities	26 899 046	27 282 386
Deposits, loans and advances to banks and other monetary institutions	2 750 183	2 749 436
Loans and advances to customers	61 018 079	61 442 839
LIABILITIES MEASURED AT AMORTISED COST		
Liabilities to banks and other monetary institutions	200 553	200 493
Liabilities to customers	128 507 152	128 519 247
Debt securities issued	4 900 775	4 904 260
Subordinated debt	1 556 096	1 555 671

31.12.2024	Balance sheet value	Fair value
ASSETS MEASURED AT AMORTISED COST		
Debt securities	24 059 861	24 169 924
Deposits, loans and advances to banks and other monetary institutions	2 378 592	2 378 379
Loans and advances to customers (*)	60 793 571	60 262 345
LIABILITIES MEASURED AT AMORTISED COST		
Liabilities to banks and other monetary institutions	210 931	210 931
Liabilities to customers	117 642 600	117 637 152
Debt securities issued	5 030 166	5 035 868
Subordinated debt	1 562 330	1 563 653

\* The negative impact of fair value valuation of the loans portfolio is largely attributable to growth of loan spreads. The methodology, which the Bank uses for valuation of the loans portfolio, assumes that current spreads best reflect existing market conditions and economic situation. In result, paradoxically whenever the spreads of new loans increase, fair value of the "old" loans portfolio falls.

## 5.2. FINANCIAL INSTRUMENTS RECOGNIZED AT FAIR VALUE IN THE BALANCE SHEET

The table below presents balance-sheet values of instruments measured at fair value, by applied fair value measurement technique:

Data in PLN'000, as at 30.09.2025

	Quoted market prices	Valuation techniques - observable inputs	Valuation techniques - significant unobservable inputs
	Level 1	Level 2	Level 3
<b>ASSETS</b>			
Financial assets held for trading			
Valuation of derivatives	0	70 801	120 713
Shares	177	0	0
Debt securities	745 015	0	0
Transactions with repurchase agreement	479 525	0	0
Non-trading financial assets mandatorily at fair value through profit or loss			
Equity instruments	30 001	0	121 580
Debt securities	0	0	21 225
Loans and advances	0	0	815
Financial assets at fair value through other comprehensive income			
Equity instruments	626	0	36 227
Debt securities	29 317 190	10 193 274	0
Loans and advances	0	0	9 609 638
Derivatives – Hedge accounting	0	0	0
<b>LIABILITIES</b>			
Financial liabilities held for trading			
Valuation of derivatives	0	140 239	122 444
Short positions	498 414	0	0
Derivatives – Hedge accounting	0	26 728	0

Data in PLN'000, as at 31.12.2024

	Level 1	Level 2	Level 3
<b>ASSETS</b>			
Financial assets held for trading			
Valuation of derivatives	0	74 570	182 524
Shares	115	0	0
Debt securities	555 364	0	0
Transactions with repurchase agreement	194 218	0	0
Non-trading financial assets mandatorily at fair value through profit or loss			
Equity instruments	0	0	66 609
Debt securities	0	0	51 790
Loans and advances	0	0	1 825
Financial assets at fair value through other comprehensive income			
Equity instruments	481	0	36 227
Debt securities	20 389 685	8 597 254	0
Loans and advances	0	0	11 135 416
Derivatives – Hedge accounting	0	0	0
<b>LIABILITIES</b>			
Financial liabilities held for trading			
Valuation of derivatives	0	40 758	185 991
Short positions	190 769	0	0
Derivatives – Hedge accounting	0	101 539	0

Changes of fair values of instruments measured on the basis of valuation techniques with use of significant parameters not derived from the market are presented in the table below (in '000 PLN).

	Valuation of derivatives - Indexes options	Valuation of derivatives - Options embedded in deposits	Equity instruments	Debt securities	Loans and advances at fair value through profit or loss	Loans and advances at fair value through other comprehensive income
<b>Balance as at 01.01.2025</b>	<b>178 195</b>	<b>(181 662)</b>	<b>102 836</b>	<b>51 790</b>	<b>1 825</b>	<b>11 135 416</b>
Settlement/sell/purchase/transfer to the portfolio	28 767	(27 062)	0	0	(2 372)	(2 143 209)
Change of valuation recognized in equity	0	0	0	0	0	118 540
Interest income and other of similar nature	0	0	0	0	911	498 891
Results on financial assets and liabilities held for trading	(88 559)	88 590	0	0	0	0
Result on non-trading financial assets mandatorily at fair value through profit or loss	0	0	54 971	(30 565)	451	0
Result on exchange differences	0	0	(1)	0	0	0
<b>Balance as at 30.09.2025</b>	<b>118 403</b>	<b>(120 134)</b>	<b>157 806</b>	<b>21 225</b>	<b>815</b>	<b>9 609 638</b>

	Valuation of derivatives - Indexes options	Valuation of derivatives - Options embedded in deposits	Equity instruments	Debt securities	Loans and advances at fair value through profit or loss	Loans and advances at fair value through other comprehensive income
<b>Balance as at 01.01.2024</b>	<b>405 612</b>	<b>(414 200)</b>	<b>95 151</b>	<b>81 014</b>	<b>19 349</b>	<b>11 799 748</b>
Settlement/sell/purchase/transfer to the portfolio	(248 040)	251 045	(46 959)	0	(21 554)	(1 298 422)
Change of valuation recognized in equity	0	0	7 847	0	0	(160 097)
Interest income and other of similar nature	0	0	0	0	3 285	794 187
Results on financial assets and liabilities held for trading	20 623	(18 507)	0	0	0	0
Result on non-trading financial assets mandatorily at fair value through profit or loss	0	0	46 803	(29 224)	745	0
Result on exchange differences	0	0	(6)	0	0	0
<b>Balance as at 31.12.2024</b>	<b>178 195</b>	<b>(181 662)</b>	<b>102 836</b>	<b>51 790</b>	<b>1 825</b>	<b>11 135 416</b>

## 6. LEGAL RISK RELATED TO FOREIGN CURRENCY MORTGAGE LOANS

On September 30, 2025, the Bank had 18,950 loan agreements and additionally 2,334 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 (45% loans agreements before the courts of first instance and 55% loans agreements before the courts of second instance) with the total value of claims filed by the plaintiffs amounting to PLN 3,955.2 million and CHF 324.0 million (Bank Millennium portfolio: PLN 3,452.6 million and CHF 312.1 million and former Euro Bank portfolio: PLN 502.6 million and CHF 11.9 million). 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 18,950 BM loan agreements in ongoing individual cases 450 are also part of class action. From the total number of individual litigations against the Bank approximately 4,400 or 23% were submitted by borrowers that had already naturally or early fully repaid the loan or were converted to polish zloty at the moment of submission. Approximately another 1,000 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.

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 1,517. Out of 1,517 loan agreements in class action 450 are also part of ongoing individual cases, 44 concluded settlements and 61 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 and October 6, 2025, the court issued orders setting aside the judgment and discontinuing the proceedings from the persons who entered into amicable settlements. Based on these orders, the number of credit agreements covered by the class action dropped from 3,273 to 1,517.

Until the end of 2019, 1,980 individual claims were filed against the Bank (in addition, 235 against former Euro Bank), in 2020 the number increased by 3,002 (265), in 2021 the number increased by 6,152 (421), in 2022 the number increased by 5,753 (407), in 2023 the number increased by 6,863 (645), in 2024 the number increased by 5,836 (655), while in the first three quarters of 2025 the number increased by 3,014 (356).

Based on ZBP (the Polish Banking Association) data gathered from all banks having FX mortgage loans, vast majority of disputes were finally resolved against the banks. As far as Bank Millennium (incl. former Euro Bank portfolio) is concerned, from 2015 until end of the third quarter of 2025, 14,613 cases were finally resolved (14,485 in claims submitted by clients against the Bank and 128 in claims submitted by the Bank against clients i.e. debt collection cases) out of which 4,631 were settlements, 121 were remissions, 83 rulings were favourable for the Bank and 9,778 were unfavourable including both invalidation of loan agreements as well as conversions into PLN+LIBOR. The Bank undertakes proper legal actions in order to secure repayment of initially disbursed capital of the loan.

The outstanding gross balance of the loan agreements under individual court cases and class action against the Bank (incl. former Euro Bank portfolio) on 30 September 2025 was CHF 945 million (of which the outstanding amount of the loan agreements under the class action proceeding was CHF 66 million).

In the 3 quarters of the year 2025, the Bank created PLN 1,314 million of provisions for Bank Millennium originated portfolio and PLN 189.2 million for the former Euro Bank originated portfolio. The balance sheet value of provisions for the Bank Millennium portfolio at the end of September 2025 was PLN 6,968.3 million, and for the former Euro Bank portfolio - PLN 837.6 million.

The methodology developed by the Bank of calculating provisions for legal risk involved with indexed loans is based on the following main parameters resulting from historical observations or expert assumptions::

- (i) the number of ongoing cases (including class action agreements);  
 the number of potential future court case: the Bank monitors customer behaviors, analyzes 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 2.6 thousand 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 attributes a much lower probability of becoming the subject of a court case, Bank anticipates that approximately 1.8 thousand of the roughly 35,8 thousand repaid loans — those with the strong economic rationale for initiating legal proceedings against the Bank and which were not previously subject to a settlement — may result in future litigation initiated by the borrowers;
- (ii) estimates involved with amicable settlements with clients, concluded in court or out of court:
  - a. the bank assumes a 12% probability of success in concluding a settlement as part of negotiations conducted with clients in the course of court proceedings;
  - b. negotiations are conducted on a case-by-case basis and can be stopped at any time by the Bank;
  - c. due to significant negotiation efforts already made in the past, the probability of success in these negotiations in the future is decreasing, and at the same time most customers have already contacted the Bank regarding the possible conversion of loans into PLN.

The Bank is open to negotiate case by case conditions for early repayment or conversion of loans to PLN. As a result of these negotiations, the number of active FX mortgage loans originated by Bank Millennium decreased by 29,274. As of the end of the first three quarters of 2025, the Bank had 17,779 active FX mortgage loans.

Legal risk from former Euro Bank portfolio is fully covered by Indemnity Agreement with Société Générale S.A.

On December 8, 2020, Mr. Jacek Jastrzębski, the Chairman of the Polish Financial Supervision Authority ("PFSA") proposed a "sector" solution to address the sector risks related to FX mortgages. The solution would consist in offering banks' clients a voluntary possibility of concluding arrangements based on which a client would settle a CHF Mortgage Loan as if it was a PLN loan bearing interest at an appropriate WIBOR rate increased by the margin historically employed for such loans. The Bank in practice has been using elements of the proposal of above system solution on many individual negotiations with FX mortgage borrowers, including in the course of court proceedings.

Due to the circumstances stemming from the CJEU which excludes demanding by the Bank amounts exceeding the return of disbursed capital, the possibility of successful implementation of a general offer of KNF solution is low.

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 restitutionary 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, and thus increase the efficiency of the justice system and speed up 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.

### **The Court of Justice of the European Union and the Polish Supreme Court rulings relevant to risk assessment**

#### *Jurisprudence of the Court of Justice of the European Union*

On 3 October 2019, the Court of Justice of the European Union (the CJEU) issued the judgment in Case C-260/18 in connection with the preliminary questions formulated by the District Court of Warsaw in the case against Raiffeisen Bank International AG. The judgment of the CJEU, as regards the interpretation of European Union law made therein, is binding on domestic courts. The judgment in question interpreted Article 6 of Directive 93/13. In the light of the subject matter judgment the said provision must be interpreted in such a way that (i) the national court may invalidate a credit agreement if the removal of unfair terms detected in this agreement would alter the nature of the main subject-matter of the contract; (ii) the effects for the consumer's situation resulting from the cancellation of the contract must be assessed in the light of the circumstances existing or foreseeable at the time when the dispute arose and the will of the consumer is decisive as to whether he wishes to maintain the contract; (iii) Article 6 of the Directive precludes the filling-in of gaps in the contract caused by the removal of unfair terms from the contract solely on the basis of national legislation of a general nature or established customs; (iv) Article 6 of the Directive precludes the maintenance of unfair terms in the contract if the consumer has not consented to the maintenance of such terms. It can be noticed the CJEU found doubtful the possibility of a credit agreement being performed further in PLN while keeping interest calculated according to LIBOR.

The CJEU judgment concerns only the situation where the national court has previously found the contract term to be abusive. It is the exclusive competence of the national courts to assess, in the course of judicial proceedings, whether a particular contract term can be regarded as abusive in the circumstances of the case.

On 29 April 2021, the CJEU issued the judgement in the case C-19/20 in connection with the preliminary questions formulated by the District Court in Gdańsk in the case against of ex-BPH S.A., the CJEU said that:



- (i) it is for the national court to find that a term in a contract is unfair, even if it has been contractually amended by those parties. Such a finding leads to the restoration of the situation that the consumer would have been in in the absence of the term found to be unfair, except where the consumer, by means of amendment of the unfair term, has waived such restoration by free and informed consent. However, it does not follow from Council Directive 93/13 that a finding that the original term is unfair would, in principle, lead to annulment of the contract, since the amendment of that term made it possible to restore the balance between the obligations and rights of those parties arising under the contract and to remove the defect which vitiated it;
- (ii) the national court may remove only the unfair element of a term in a contract concluded between a seller or supplier and a consumer where the deterrent objective pursued by Council Directive 93/13 is ensured by national legislative provisions governing the use of that term, provided that that element consists of a separate contractual obligation, capable of being subject to an individual examination of its unfair nature. At the same time, provisions of the Directive preclude the referring court from removing only the unfair element of a term in a contract concluded between a seller or supplier and a consumer where such removal would amount to revising the content of that term by altering its substance;
- (iii) the consequences of a judicial finding that a term in a contract concluded between a seller or supplier and a consumer is unfair are covered by national law and the question of continuity of the contract should be assessed by the national court of its own motion in accordance with an objective approach on the basis of those provisions;
- (iv) the national court, finding that a term in a contract concluded between a seller or supplier and a consumer is unfair, shall inform the consumer, in the context of the national procedural rules after both parties have been heard, of the legal consequences entailed by annulment of the contract, irrespective of whether the consumer is represented by a professional representative.

On November 18, 2021, the Court of Justice of the European Union (CJEU) issued a judgment in case C-212/20 in connection with questions submitted by the District Court for Warsaw Wola in Warsaw in the case against Raiffeisen Bank International AG. The CJEU stated that:

- (i) the content of the clause of the loan agreement concluded between the entrepreneur and the consumer fixing the purchase and sale price of the foreign currency to which the loan is indexed should, on the basis of clear and comprehensible criteria, enable the consumer who is reasonably well informed and sufficiently observant and rational to understand how the exchange rate of the foreign currency used to calculate the amount of the loan instalments is determined, so that the consumer is able to determine himself at any time the exchange rate used by the entrepreneur;
- (ii) a national court which has found that a term of the agreement concluded between an entrepreneur and a consumer is unfair cannot interpret that term in order to mitigate its unfairness, even if such an interpretation would correspond to the common will of the parties.

On 10 June 2021, the Court of Justice of the European Union (CJEU) issued an order in case C-198/20 in connection with questions submitted by the District Court for Warsaw Wola in Warsaw in the case against Santander Bank Polska SA. The CJEU stated that the protection provided for in Council Directive 93/13/EEC is granted to all consumers, not just those who can be considered to be “duly informed and reasonably observant and circumspect average consumer”.

On 8 September 2022, the Court of Justice of the European Union (CJEU) issued a judgment in joined cases C-80/21, C-81/21, C-82/21 in connection with questions submitted by the District Court for Warsaw Śródmieście in Warsaw in cases against Deutsche Bank SA and mBank SA. The CJEU stated that:

- (i) a national court may find that the parts of a contractual term of the agreement concluded between a consumer and an entrepreneur which render it unfair are unfair, if such a deletion would not amount to a change in the content of that term that affects its substance, which is for the referring court to verify;
- (ii) a national court cannot, after annulling an unfair term contained in an agreement concluded between a consumer and an entrepreneur which does not render the agreement invalid in its entirety, replace that term with a supplementary provision of the national law;

- (iii) a national court may not, after having declared invalid an unfair term contained in an agreement concluded between a consumer and an entrepreneur which entails the invalidity of that agreement in its entirety, replace the contractual term which has been declared invalid either by interpretation of the parties' declaration of intent in order to avoid the cancellation of that agreement or by a provision of national law of a supplementary nature, even if the consumer has been informed of the effects of the invalidity of that agreement, and accepted them;
- (iv) the ten-year limitation period for a consumer's claim seeking reimbursement of sums unduly paid to the entrepreneur in performance of an unfair term of a loan agreement does not start to run on the date of each performance made by the consumer if the consumer was not able on that date to assess on his own the unfairness of the contractual term or if he had not become aware of the unfair nature of that term and without taking into account the circumstances that the agreement provided for a repayment period – in this case thirty years – well in excess of the ten-year statutory limitation period.

On March 16, 2023, the Court of Justice of the European Union issued a judgment in a case registered under case number C-6/22, following preliminary questions submitted by the District Court for Warsaw-Wola in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that:

- (i) in the event that a contract concluded between a consumer and a seller or supplier is declared invalid because one of its terms is unfair, it is for the Member States, by means of their national law, to make provision for the effects of that invalidation, in compliance with the protection granted to the consumer by that directive, in particular, by ensuring the restoration of the legal and factual situation that he or she would have been in if that unfair term had not existed;
- (ii) a national court is not allowed:
  - a. to examine of its own motion, without any prerogative conferred on it by national law in that regard, the financial situation of a consumer who has sought the invalidation of the contract between him or her and a seller or supplier on account of the presence of an unfair term without which the contract cannot legally continue to exist, even if that invalidation is liable to expose the consumer to particularly unfavorable consequences and
  - b. to refuse to declare that invalidation where the consumer has expressly sought it, after being objectively and exhaustively informed of the legal consequences and the particularly unfavorable financial consequences which it may have for him or her;
- (iii) a national court is not allowed, after it has found that a term in a contract concluded between a seller or supplier and a consumer is unfair, to fill gaps resulting from the removal of the unfair term contained therein by the application of a provision of national law which cannot be characterised as a supplementary provision. However, it is for the national court, taking account of its domestic law as a whole, to take all the measures necessary to protect the consumer from the particularly unfavorable consequences which annulment of the contract might entail for him or her.

On June 8, 2023, the Court of Justice of the European Union issued a judgment in a case registered under case number C-570/21, following preliminary questions submitted by the District Court in Warsaw in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that:

- (i) provisions of Council Directive 93/13 must be interpreted as meaning that the concept of 'consumer', within the meaning of that provision, covers a person who has concluded a loan contract intended for a purpose in part within and in part outside his or her trade, business or profession, together with a joint-borrower who did not act within his or her trade, business or profession, where the trade, business or professional purpose is so limited as not to be predominant in the overall context of that contract;
- (ii) provisions of Directive 93/13 must be interpreted as meaning that in order to determine whether a person falls within the concept of 'consumer', within the meaning of that provision, and, specifically, whether the trade, business or professional purpose of a loan contract concluded by that person is so limited as not to be predominant in the overall context of that contract, the



referring court is required to take into consideration all the relevant circumstances surrounding that contract, both quantitative and qualitative, such as, in particular, the distribution of the borrowed capital between, on the one hand, a trade, business or profession and, on the other hand, a non-professional activity and, where there are several borrowers, the fact that only one of them is pursuing a professional purpose or that the lender made the grant of credit intended for consumer purposes conditional on a partial allocation of the amount borrowed to the repayment of debts connected with a trade, business or profession.

On June 15, 2023, the Court of Justice of the European Union issued a judgment in a case registered under case number C-287/22, following preliminary questions submitted by the District Court in Warsaw in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that provisions of the Directive 93/13 must be interpreted as precluding national case-law according to which a national court may dismiss an application for the grant of interim measures lodged by a consumer seeking the suspension, pending a final decision on the invalidity of the loan agreement concluded by that consumer on the ground that that loan agreement contains unfair terms, of the payment of the monthly instalments due under that loan agreement, where the grant of those interim measures is necessary to ensure the full effectiveness of that decision.

On June 15, 2023, the CJEU issued a judgment in a case registered under case number C-520/21, following preliminary questions submitted by the District Court in Warsaw in a case against Bank Millennium, in which indicated that Directive 93/13 does not expressly regulate the consequences of invalidity of a contract concluded between a credit institution and a consumer after the removal of unfair terms contained therein. The CJEU stated that:

- (i) the provisions of the Directive 93/13 do not preclude a judicial interpretation of national law, according to which the consumer has the right to demand compensation from the credit institution beyond the reimbursement of monthly instalments and costs paid for the performance of this contract and the payment of statutory default interest from the date of the request for payment provided that the objectives of Directive 93/13 and the principle of proportionality are respected;
- (ii) the provisions of Directive 93/13 preclude the judicial interpretation of national law, according to which a credit institution has the right to demand compensation from the consumer that goes beyond the return of the capital paid for the performance of this contract and beyond the payment of statutory default interest from the date of the request for payment.

On September 21, 2023, the CJEU issued a judgement in a case registered under case number C-139/22, following preliminary questions submitted by the District Court in Warsaw in a case against mBank. The CJEU stated that:

- (i) provisions of the Directive 93/13 must be interpreted as not precluding a contractual term which has not been individually negotiated from being regarded as unfair by the national authorities concerned merely by virtue of the fact that its content is equivalent to that of a standard contract term entered in the national register of standard business terms held to be unlawful;
- (ii) the contractual term which, because of the circumstances for the performance of certain obligations of the consumer concerned provided for in that term, must be regarded as unfair, may not cease to be considered unfair on account of another term of that contract which provides for the possibility for that consumer to perform those obligations under different circumstances;
- (iii) a seller or supplier is obliged to inform the consumer concerned of the essential characteristics of the contract concluded with that seller or supplier and the risks associated with that contract, even though that consumer is its employee and has relevant knowledge in the field of the contract.

On December 7, 2023, the CJEU issued the judgement in the case C-140/22 in connection with the preliminary questions formulated by the District Court in Warsaw in the case against of mBank S.A. The Court stated that provisions of the Directive 93/13 must be interpreted as meaning that, in the context

of the cancellation, in its entirety, of a mortgage loan agreement concluded with a consumer by a banking institution on the ground that that agreement contains an unfair term without which it cannot continue in existence:

- (i) they preclude the judicial interpretation of national law according to which the exercise of the rights which that consumer draws from that directive is conditional on the lodging, by that consumer, before a court, of a declaration by which he or she states, first, not to consent to that unfair term remaining effective, secondly, to be aware of the fact that the nullity of that term entails the cancellation of that agreement and, moreover, of the consequences of that cancellation and, thirdly, to consent to the cancellation of that agreement;
- (ii) they preclude the compensation sought by the consumer concerned in respect of the restitution of the sums paid by him or her in the performance of the agreement at issue being reduced by the equivalent of the interest which that banking institution would have received if that agreement had remained in force.

The Court of Justice of European Union by an order of December 11, 2023, closed the case registered under case number C-756/22 initiated by the District Court in Warsaw in the case brought by Bank Millennium and ruled that the provisions of Directive 93/13 must be interpreted as meaning that, in the context of declaring a mortgage loan agreement concluded with a consumer by a banking institution to be invalid in its entirety on the grounds that, that the contract contains unfair terms without which it cannot be continued, they preclude a judicial interpretation of the law of a Member State according to which that institution is entitled to recover from that consumer amounts other than the capital paid in performance of that contract and statutory interest for delay from the time of the demand for payment.

On December 14, 2023, the CJEU issued the judgement in the case C-28/22 in connection with the preliminary questions referred by the District Court in Warsaw in the case of ex-Getin Noble Bank S.A. The Court stated that:

- (i) provisions of Directive 93/13 read in the light of the principle of effectiveness must be interpreted as precluding a judicial interpretation of national law according to which, following the cancellation of a mortgage loan agreement concluded with a consumer by a seller or supplier, on account of unfair terms contained in that agreement, the limitation period for the claims of that seller or supplier stemming from the nullity of that agreement starts to run only as from the date on which the agreement becomes definitively unenforceable, whereas the limitation period for the claims of that consumer stemming from the nullity of that agreement begins to run as from the day on which the consumer became aware, or should reasonably have become aware, of the unfair nature of the term entailing such nullity;
- (ii) provisions of the Directive 93/13 must be interpreted as not precluding a judicial interpretation of national law according to which it is not for a seller or supplier who has concluded a mortgage loan agreement with a consumer to ascertain whether the consumer is aware of the consequences of the removal of the unfair terms contained in that agreement or of that agreement being no longer capable of continuing in existence if those terms were removed;
- (iii) provisions of the Directive 93/13, read in the light of the principle of effectiveness, must be interpreted as precluding a judicial interpretation of national law according to which, where a mortgage loan agreement concluded with a consumer by a seller or supplier is no longer capable of continuing in existence after the unfair terms in that agreement have been removed, that seller or supplier may rely on a right of retention which allows him or her to make the restitution of the sums which it has received from that consumer conditional on that consumer making an offer to repay the sums which he or she has himself or herself received from that seller or supplier or to provide a security for the repayment of those sums, where the exercise by that seller or supplier of that right of retention entails the loss, for that consumer, of the right to obtain default interest as from the expiry of the time limit set for performance by the seller or supplier concerned, following receipt by that seller or supplier of a request to repay the sums he or she had been paid in performance of that agreement.

The Court of Justice of the European Union by an order of January 15, 2024, closed the case registered under case number C-488/23 following a question from the District Court of Warsaw, indicating that the right of a financial institution to demand the valorization of the disbursed capital after a loan agreement has been declared invalid was excluded in the judgment of June 15, 2023 issued in case C-520/21.

On January 18, 2024, the CJEU issued the judgement in the case C-531/22 in connection with the preliminary questions referred by the District Court in Warsaw in the case of ex-Getin Noble Bank S.A. The Court stated that:

- (i) the provisions of Directive 93/13 preclude national legislation which provides that a national court may not examine of its own motion the potentially unfair nature of the terms contained in a contract and draw the consequences thereof, where it is supervising enforcement proceedings carried out on the basis of a final decision to issue an order for payment which is subject to *res judicata*:
  - a. if the regulations do not provide for such an examination at the stage of issuing a payment order, or
  - b. if such examination is provided for only at the stage of opposition to the order for payment in question, provided that there is a significant risk that the consumer in question will not file the required opposition either because the time limit specified for this purpose is very short, or because of the cost of the proceedings before the court in relation to the amount of the disputed debt, or because the national legislation does not provide for the obligation to provide that consumer with all the information necessary for him to establish the extent of his rights;
- (ii) the provisions of Directive 93/13 do not preclude national case law according to which the entry of a term of a contract in a national register of prohibited clauses has the effect of declaring that term unfair in any proceedings involving a consumer, including against a trader other than the one against whom proceedings for the entry of the said term in that national register were pending, and where that term does not have the same wording as the term entered in the said register, but has the same meaning and has the same effect with respect to the consumer in question.

By decision of 3 May 2024, the Court of Justice of the European Union closed the case registered under case no. C-348/23 following a question from the District Court in Warsaw, indicating that they preclude the recognition that the legal effects related to the declaration of invalidity of the contract are conditional on the fulfilment by the consumer of the condition precedent for that consumer to make a declaration before the national court, that it does not agree to maintain the contractual term in force and that it is aware that the invalidity of the said term entails the annulment of the loan agreement and its effects and that it consents to the annulment of the agreement.

By decision of 8 May 2024, the Court of Justice of the European Union closed the case registered under case no. C-424/22 as a result of a question from the Regional Court in Kraków, indicating that they preclude the application by a financial institution of the right of retention which makes the consumer's receipt of the amounts awarded to him by the court conditional on the consumer's simultaneous offer of reimbursement or security for the return of the entire benefit received from that financial institution.

On June 19, 2025, the Court of Justice of the European Union issued a judgment in Case C-396/24 following preliminary questions referred by the District Court in Krakow in the case . The Court held that:

- (i) Article 7(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts must be interpreted as meaning that: It precludes national case-law according to which, where a term of a loan agreement found to be unfair leads to the invalidity of that agreement, the trader is entitled to demand from the consumer the return of the entire nominal amount of the loan

granted, regardless of the amounts repaid by the consumer under that agreement and regardless of the remaining amount to be repaid.

- (ii) Article 7(1) of Directive 93/13 must be interpreted as meaning that: It precludes national provisions under which, in the event of the consumer acknowledging the trader's claim for the return of amounts paid under a loan agreement found to be invalid due to an unfair term contained therein, the court hearing the case is required *ex officio* to give the judgment upholding that claim immediate enforceability, unless national law allows that court to take all necessary measures to protect the consumer from particularly harmful consequences that may result from giving such enforceability to that judgment.

#### *Jurisprudence of the Polish Supreme Court*

On 7 May 2021, the Supreme Court composed of 7 judges of the Supreme Court, issued a resolution for which the meaning of legal principle has been granted, stating that:

- (i) an abusive contractual clause (art. 385(1) § 1 of the Civil Code), by force of the law itself, is ineffective to the benefit of the consumer who may consequently give conscious and free consent to this clause and thus restore its effectiveness retroactively;
- (ii) if without the ineffective clause the loan agreement cannot bind, the consumer and the lender shall be eligible for separate claims for return of monetary performances made in exercising this agreement (art. 410 § 1 in relation to art. 405 of the Civil Code). The lender may demand return of the performance from the moment the loan agreement becomes permanently ineffective.

On April 28, 2022 the Supreme Court issued a resolution (III CZP 40/22) in which it indicated that in disputes with consumers, the provision of Article 358(1) of the Civil Code is a special provision to Article 353(1) of the Civil Code, which means that if the prerequisites for the application of both provisions exist, the court should apply the special provision and declare the contractual provision permanently ineffective, rather than invalid. This decision of the Supreme Court should be perceived as significantly limiting the risk of the bank's claims for return of capital being time-barred.

The effect of the Supreme Court's resolution of 7 May 2021 is that the bank is entitled to a refund of the cash benefit provided by the bank in performance of a permanently ineffective contract. Taking into account the uncertainty as to the starting point of the limitation period for the bank's claims, the Bank, in order to protect its interests, files lawsuits for payment against borrowers in a court dispute with the Bank and in other circumstances where such risk may exist. The Bank's demand consists of a claim for return of the capital made available to the borrower under the contract. By 30 September 2025 the Bank filed 16,062 lawsuits against the borrowers.

On 25 April 2024, a session of the Civil Chamber of the Supreme Court was held to answer questions formulated by the First President of the Supreme Court, published on 29 January 2021, on key issues related to FX mortgage loan agreements. The Supreme Court, composed of the entire Civil Chamber, adopted a resolution having the force of a legal principle, in which it stated that:

- (i) When finding that a provision of an indexed or denominated credit agreement relating to the manner of determining the foreign currency exchange rate constitutes an unfair contractual provision and is not binding, then in currently existing legal situation it cannot be stated that such a provision could be replaced by another formula of defining the foreign currency exchange rate resulting from law or custom.
- (ii) In case of impossibility to determine the foreign currency exchange rate binding the parties in the indexed or denominated loan agreement, the agreement is not binding also in the remaining scope.
- (iii) If, in the performance of a credit agreement which is not binding due to the unfair nature of its provisions, the bank has disbursed to the borrower all or part of the amount of the credit and the borrower has made repayments of the credit, independent claims for repayment of the undue performance shall arise in favor of each party.

- (iv) If a credit agreement is not binding due to the unfair nature of its provisions, the statute of limitations of the bank's claim for repayment of amounts disbursed under the credit shall, as a rule, start to run from the day following the day on which the borrower challenges being bound by the provisions of agreement.
- (v) If a credit agreement is not binding due to the unfair nature of its provisions, there shall be no legal basis for any party to claim interest or other remuneration because of using party's pecuniary means during the period from the provision of undue benefit until the delay in the return of this benefit.

On 19 June 2024, the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 31/23) stating that:

The right of retention (Article 496 of the Civil Code) does not apply to the party that can set off its claim against the claim of the other party.

On 28 February 2025, the Supreme Court issued a resolution of 7 judges of the Supreme Court (III CZP 126/22), in which it stated that:

- (i) A bank loan agreement (Article 69(1) of the Banking Law Act of 29 August 1997) is a mutual agreement within the meaning of Article 487 § 2 of the Civil Code.

On 5 March 2025 the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 37/24), in which it stated that:

- (i) In the event of a claim for repayment from a bank of a consideration fulfilled on the basis of a credit agreement which has proved to be invalid, the bank is not entitled to the right of retention under Article 496 in connection with Article 497 of the Civil Code.

On May 15, 2025, the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 22/24), in which it indicated that:

- (i) Under the legal state in force until June 30, 2022, a request for a settlement attempt interrupted the limitation period of the claim, unless the circumstances of making this action indicate that it was not undertaken directly for the purpose of pursuing or determining, or satisfying or securing the claim (Article 123 § 1 point 1 of the Civil Code).

Due to the CJEU jurisprudence interpreting the causes and effects of invalidity of foreign currency mortgage loan agreements as well as above indicated resolution of the Civil Chamber of the Supreme Court, the area of interpretation of regulations by Polish courts in this respect appears to be limited. However, further jurisprudential practice of the Polish courts will play certain role in practical realisation of the CJEU's and the Supreme Court's guidance.

## 7. ADDITIONAL INFORMATION

### 7.1. ISSUE, REDEMPTION OR REPAYMENT OF DEBT OR EQUITY INSTRUMENTS

Issued debt securities movements

	01.01.2025 – 30.09.2025	01.01.2024 – 31.12.2024
Balance at the beginning of the period	5 030 166	3 027 952
Increases, on account of:	320 917	2 502 429

issue of bonds by the Bank	0	2 131 700
valuation of the Bank's bonds designated to fair value hedged relationship	0	3 159
interest accrual	320 917	367 570
<b>Reductions, on account of:</b>	<b>(450 308)</b>	<b>(500 215)</b>
redemption of the Bank's bonds	(26 000)	(128 731)
other changes in carrying amount - (including exchange rate differences)	(2 016)	(32 701)
valuation of the Bank's bonds designated to fair value hedged relationship	(18 006)	0
interest payment	(404 286)	(338 783)
<b>Balance at the end of the period</b>	<b>4 900 775</b>	<b>5 030 166</b>

## 7.2. CAPITAL MANAGEMENT

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, the Group/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 macroeconomic conditions.

The Bank is obliged by law to meet minimum own funds and leverage ratio requirements, set in art. 92 of the Regulation (EU) 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions as amended and amending Regulation (EU) No 648/2012 (CRR II). At the same time, the following levels, recommendations, and buffers were included in capital limits/targets setting:

- Pillar II FX mortgage loans buffer (P2R buffer) - KNF decisions from January and February 2025 setting that buffer at 0.0%;
- 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 KNF each year,
  - Systemic risk buffer at the level of 0%, reduced from 3% in March 2020,
  - Countercyclical buffer at 1% in force from the 25<sup>th</sup> of September 2025, and it will be elevated to 2% from the 25<sup>th</sup> of September 2026.

In December 2024, the Bank received the letter from PFSA informing on non-imposing an additional capital charge ("P2G").

Capital adequacy of the Bank was as follows (PLN mn, %):

<b>Capital adequacy</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
Risk-weighted assets	48 463.78	40 928.26
Own Funds requirements. including:	3 877.10	3 274.26
- Credit risk and counterparty credit risk	2 853.81	2 773.83
- Market risk	37.68	19.81
- Operational risk	966.60	478.00
- Credit Valuation Adjustment CVA	19.01	2.61
Own Funds. including:	8 118.03	7 352.52
Common Equity Tier 1 Capital	7 258.78	6 264.59
Tier 2 Capital	859.25	1 087.93
<b>Total Capital Ratio (TCR)</b>	<b>16.75%</b>	<b>17.96%</b>
<b>Tier 1 Capital ratio (T1)</b>	<b>14.98%</b>	<b>15.31%</b>
<b>Common Equity Tier 1 Capital ratio (CET1)</b>	<b>14.98%</b>	<b>15.31%</b>
<b>Leverage ratio</b>	<b>5.13%</b>	<b>4.67%</b>



Capital adequacy showed as surpluses/deficits on required or recommended levels is presented in the below table.

<b>Capital adequacy</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
<b>Total Capital ratio (TCR)</b>	<b>16.75%</b>	<b>17.96%</b>
Minimum required level (OCR)	11.75%	12.22%
Surplus(+) / Deficit(-) of TCR capital adequacy (p.p.)	5.00%	5.74%
Minimum recommended level TCR (OCR+P2G)	11.75%	13.81%
Surplus(+) / Deficit(-) on recommended level (p.p.)	5.00%	4.15%
<b>Tier 1 Capital Ratio (T1)</b>	<b>14.98%</b>	<b>15.31%</b>
Minimum required level (OCR)	9.75%	9.85%
Surplus(+) / Deficit(-) of T1 capital adequacy (p.p.)	5.23%	5.46%
Minimum recommended level (OCR+P2G)	9.75%	11.44%
Surplus(+) / Deficit(-) on recommended level (p.p.)	5.23%	3.87%
<b>Common Equity Tier 1 Capital Ratio (CET1)</b>	<b>14.98%</b>	<b>15.31%</b>
Minimum required level (OCR)	8.25%	8.07%
Surplus(+) / Deficit(-) of CET1 capital adequacy (p.p.)	6.73%	7.24%
Minimum recommended level (OCR+P2G)	8.25%	9.66%
Surplus(+) / Deficit(-) on recommended level (p.p.)	6.73%	5.65%
<b>Leverage ratio</b>	<b>5.13%</b>	<b>4.64%</b>
Minimum required level	3.00%	3.00%
Surplus(+) / deficit (-) on leverage ratio (p.p.)	2.13%	1.64%

In Q3 2025, capital ratios increased – the Tier 1 capital ratio (equal to the Common Equity Tier 1 capital ratio) by 70 basis points, and the total capital ratio by 47 basis points. Tier 1 capital (CET1) increased by PLN 587 million (8.3%), mainly as a result of the inclusion of the net financial result for the first half of 2025 (PLN 491 million). Own funds increased by PLN 510 million (6.7%), with Tier 2 capital decreasing by PLN 77 million, which is related to the shortened maturity of issued subordinated bonds. Capital requirements increased by 3.7% (PLN 138 million), with credit risk requirements increasing by PLN 141 million (5.2%), primarily due to portfolio growth. Changes in other capital requirement categories were not significant.

The leverage ratio increased by 46 basis points in Q3 2025 (5.13% vs. 4.67%). The excess over the regulatory minimum of 3% is 213 basis points.

The minimum capital ratios required by the Polish Financial Supervision Authority (KNF) for the combined buffer requirement (OCR) plus the additional P2G surcharge are being met with a surplus at the end of Q3 2025.

## **MINIMUM REQUIREMENTS FOR OWN FUNDS AND LIABILITIES SUBJECT TO WRITE DOWN OR CONVERSION (MREL)**

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

In terms of the MREL<sub>trea</sub> and MREL<sub>tem</sub> requirements, the Group presents a surplus compared to the minimum required levels as of September 30, 2025, and also meets the MREL<sub>trea</sub> Requirement after the inclusion of the Combined Buffer Requirement.



<b>MREL</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
<b>MRELTrea ratio</b>	<b>25.51%</b>	<b>28.06%</b>
Minimum required level MRELTrea	15.36%	18.03%
Surplus(+) / Deficit(-) of MRELTrea (pp)	10.15pp	10.03pp
Minimum required level including Combined Buffer Requirement (CBR)	19.11%	20.78%
Surplus(+) / Deficit(-) of MRELTrea+CBR (pp)	6.40pp	7.28pp
<b>MRELtem ratio</b>	<b>8.83%</b>	<b>8.71%</b>
Minimum required level of MRELtem	5.91%	5.91%
Surplus(+) / Deficit(-) of MRELtem (pp)	2.92pp	2.80pp

In May 2025, the Bank received a letter from the Bank Guarantee Fund regarding the joint decision of the Single Resolution Board (SRB) and the BFG obliging the Bank to meet the communicated MRELTrea requirements in the amount of 15.36% (previously 18.03% in the decision received June 2023) and 14.15% taking into account the subordination criterion and MRELtem requirements in the amount of 5.91% (as in the decision received in 2024) and 5.54% taking into account the subordination criterion.

### 7.3. OFF BALANCE SHEET ITEMS

Structure of off-balance sheet liabilities was as follows:

<b>Amount '000 PLN</b>	<b>30.09.2025</b>	<b>31.12.2024</b>
<b>Commitments granted:</b>	<b>17 973 791</b>	<b>14 869 414</b>
- financial	16 058 787	13 155 721
- guarantee	1 915 004	1 713 693
<b>Commitments received:</b>	<b>3 164 166</b>	<b>3 047 096</b>
- financial	0	346
- guarantee	3 164 166	3 046 750

### 7.4. REFORM OF BENCHMARKS

#### WIBOR

In May 2022, the Polish government announced that WIBOR would be replaced by a different (lower) rate from 1 January 2023. In June 2022, a Working Group was established, including commercial banks, GPW Benchmark (Administrator of WIBOR), KNF.

In July 2022, the National Working Group on Reference Rate Reform (NWG) was established in connection with the planned reform of reference rates in Poland. The objective of the NGR's work to introduce a new interest rate benchmark and replace the currently used WIBOR index with it while ensuring the compliance with BMR, including in particular ensuring credibility, transparency and reliability in the development and application of the new benchmark.

The National Working Group involves representatives of the Ministry of Finance, the National Bank of Poland, the Office of the Financial Supervision Authority, the Bank Guarantee Fund, the Polish Development Fund, the Warsaw Stock Exchange, the National Depository for Securities, Bank Gospodarstwa Krajowego, the GPW Benchmark, as well as representatives of credit institutions, i.e. in particular, banks, financial institutions, including investment funds, insurance companies, factoring and leasing companies, entities that are bond issuers, including corporate and municipal bonds, clearing houses.

The work of the National Working Group is coordinated and supervised by a Steering Committee including representatives of key institutions: Financial Supervision Authority, the National Bank of Poland, the Ministry of Finance, the Bank Guarantee Fund, as well as the GPW Benchmark - the administrator of the reference rates, BondSpot S.A - and the Polish Bank Association (Polish: Związek Banków Polskich).

The NWG's activities are executed in a project formula, where project streams have been identified and where Bank Millennium representatives are actively contributing to the work.

The Bank uses the WIBOR reference rate in the following products (in PLN million as of 30 September 2025):

- mortgage loans: **17 575,53** mortgage loans based on WIBOR (excluding **13 439,27** mortgage loans currently with temporary fixed rate where the clients have the option to switch to variable rate indexed to WIBOR after the end of such temporary fixed rate initial period);
- loan products, factoring and corporate discounting products: **14 585,35**;
- debt instruments **14 814,18**;
  - Assets: 12 707,41
  - Liabilities: 2 106,77
- derivative instruments: **16 922,02**

The Bank also applies instruments based on WIBOR benchmarks in hedge accounting, details of the hedging relationships used by the Group, the items designated as hedged and hedging and the presentation of the result on these transactions are presented in Note 24 "Derivatives - Hedge accounting" in Chapter 13 "Notes to the Consolidated Financial Statements.

On March 28, 2025, the Steering Committee of the National Working Group approved the updated Roadmap for the process of replacing the WIBOR and WIBID reference rates and confirmed the final conversion date at the end of 2027. On June 2, 2025 official designation of the POLSTR (Polish Short Term Rate) Interest Rate Index and the indices from the POLSTR Composite Index Family has begun. As of September 1, 2025, POLSTR has obtained the status of a benchmark in accordance with the BMR Regulation.

The administrator of POLSTR is GPW Benchmark SA. In September 2025, the NGR Steering Committee (KS NGR) published updated NGR recommendations regarding the standards for applying the new target risk-free rate (RFR) index in new banking, leasing, and factoring products, as well as in financial instruments. Recommendations concerning legacy portfolios are currently under consultation.

For financial institutions, the key actions will include adapting IT systems, operational procedures, and legal frameworks related to the application of the target POLSTR index. In connection with this, Bank Millennium S.A. established, by resolution of the Bank's Management Board of 24 August 2022, an internal project reporting to the Management Board in order to duly manage the transition process of WIBOR to new index and to implement the work in accordance with the roadmap. This work involves representatives from a significant number of the Bank's business units, including, in particular, representatives responsible for product areas and risk management issues, including, in particular, interest rate risk and operational risk. The structure of the project includes the division into streams covering products and processes where the WIBOR benchmark is applied, the management of the project by a dedicated project manager and the periodical reporting of statuses on the individual streams.

At the current stage of the project, the Bank continuously monitors the work of the National Working Group and actively participates in the activities of individual workstreams. At the same time, appropriate project decisions are being made, and all developed recommendations are systematically incorporated into the Bank's initiatives.

Date	Name and surname	Position/Function	Signature
23.10.2025	Fernando Bicho	Deputy Chairman of the Management Board	Signed by a qualified electronic signature