Management Board Report

on Operations of ING Bank Śląski S.A. Group
in H1 2025

ING

Contents

About us

Who we are

Our history goes back to 1988. It was in that year, exactly on 11 April, that the Council of Ministers issued a regulation on the establishment of Bank Śląski in Katowice, and this is where our head office is still located today. Less than a year later, at the beginning of February 1989, Bank Śląski began its operations. In 1991, our bank was transformed from a state-owned bank into a public limited company. In 1993, we received approval from the Securities Commission to list our shares to the public. In January 1994, ING acquired 2.4 million shares in our bank which corresponded to 25.9% of the share capital. On 25 January 1994, the shares of Bank Śląski made their debut on the Warsaw Stock Exchange.

Since 6 September 2001 – following the merger of Bank Śląski with the ING branch – we have been operating under our current name, ING Bank Śląski S.A. At that time, ING Group N.V. became the majority shareholder in our bank (with a stake of 87.77%, which was reduced to 75.00% in March 2005).

The bank is effectively growing organically. The bank's mission is to inspire and assist clients in making the right life decisions. Achieving this requires a committed and responsive workforce. We pursue this mission through our bank, its subsidiaries and, above all, through our group of 7,890 employees (as at the end of June 2025).

After more than 30 years of continuous development, we are now ranked 4th in terms of total assets and commercial balance (total deposits and loans) in the Polish commercial banking sector. Our scale of operation contributes to the development of the Polish economy, but it also brings with it an awareness of the enormous responsibility for our employees, clients, society and the environment.

We are a universal bank that serves both retail clients and businesses. The Internet is the primary channel of communication with our over 5 million clients, with mobile banking playing a rapidly growing role. We also serve our clients through a network of 161 meeting places. These are places where our clients can ask for advice and talk about their financial needs.

In H1 2025, ING held a strong second position in terms of brand power (Demand Power) (Kantar Polska[1]). The high level of brand strength indicates the role of the ING brand and its perception in building the bank's market share. The ING brand stands out in the market by being responsive to client needs and is seen as a trend-setting brand for banking in Poland. Its particularly strong image dimension is the perception of ING as a brand for the resourceful and entrepreneurial among clients, which is reflected in its strong image position among companies. ING is seen as a bank with which companies can develop their business ventures. The strong image also translated into consumer preference for ING when choosing a savings account and a business account, and in second place when choosing a personal account, mortgages, pension and investment products, among others. The bank's ESG activities, including initiatives to educate entrepreneurs and children about cybersecurity, have translated into a perception of the bank as a brand that facilitates clients' sustainability initiatives.

[1] *In previous management reports, the results were based on a local tracking study, which ended in March 2025. Since May 2025, a new global tracking study has been carried out. The differences in these studies are mainly based on the expansion of the sample. Due to these changes, the results of the local survey cannot be compared with the current global survey.*

How the ING Group operates in Poland

ING Bank Śląski S.A. is the parent company of the ING Bank Śląski S.A. Group. As a group, we have established ourselves as one of the largest financial institutions in Poland over our more than 30 years of operation. Our core business is banking, i.e., inter alia, placing the funds entrusted to us by our clients at risk (this is indicated in detail in paragraph 8 of our charter). As a bank, together with our subsidiaries, we form a group in which we are also active in, among other things:

- leasing,
- factoring,
- payroll and accounting services,
- sales and implementation of business process robotisation software,
- the provision of payment services for the processing of e-commerce transactions.

Group companies are also founders of the ING for Children Foundation and the ING Polish Art Foundation.

In H1 2025, the bank and its subsidiaries did not enter into any transactions with related entities that would be individually or in aggregate material transactions entered into on other than arm's length terms.

ING Bank Śląski conducts interbank market operations with ING Bank N.V. and its subsidiaries. These include deposits, loans, borrowings and derivative operations. Our bank also maintains the bank accounts of ING Group N.V. entities, as well as providing outsourcing and advisory services. All of the above transactions take place on an arm's length basis.

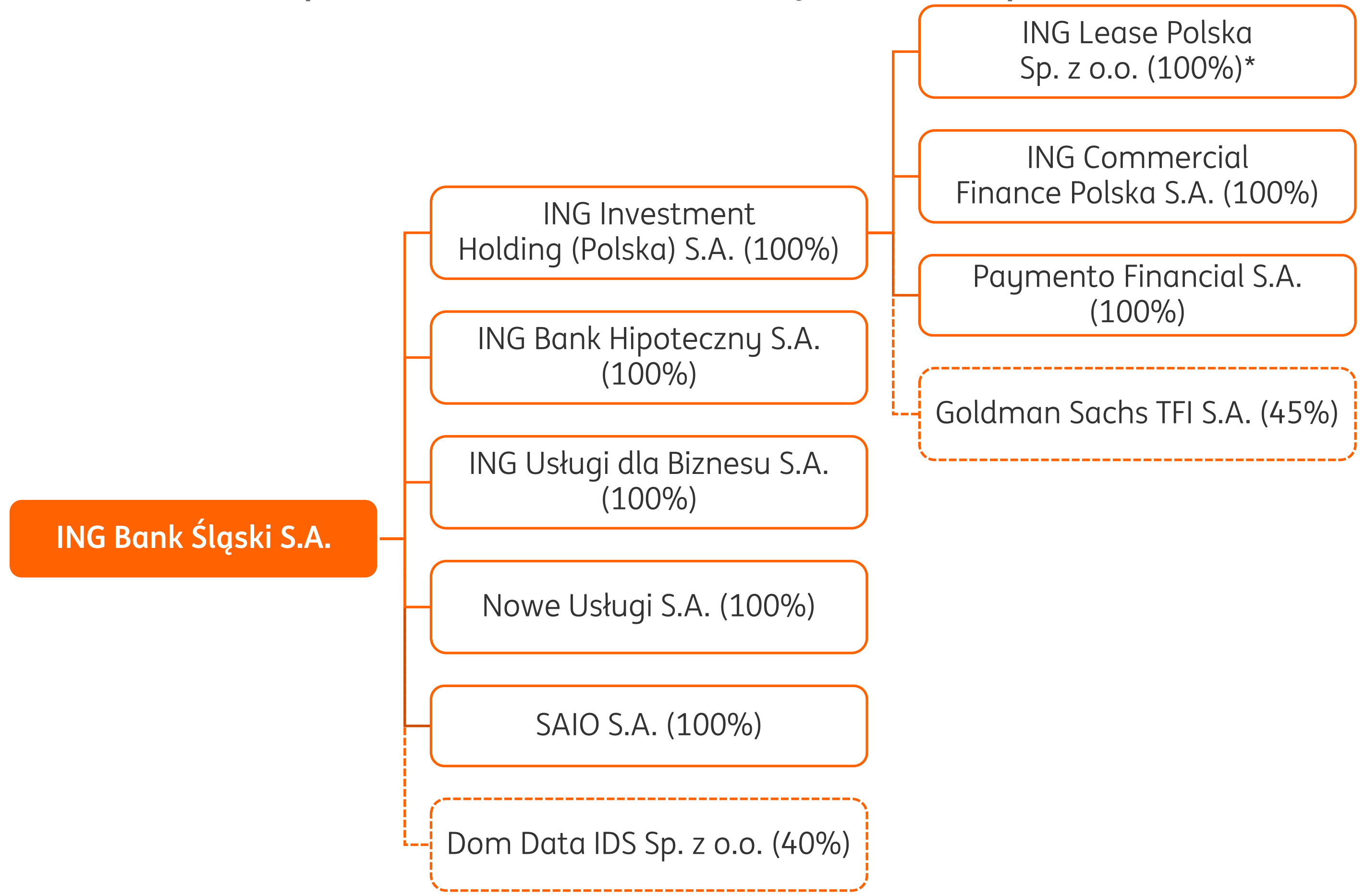
The operating expenses incurred by the bank for the parent company result primarily from agreements for consultancy and advisory services, operational support and data processing and analysis, the purchase of IT services and the provision of software licences.

In terms of costs incurred by our bank for other related entities, outsourcing agreements for the provision of system resource hosting services for various applications and IT security monitoring and penetration testing play a dominant role.

For more information on transactions with related entities, read the note "Transactions with related entities" in the Consolidated Semi-annual Report of the ING Bank Śląski S.A. Group for H1 2025.

ING Bank Śląski S.A. Group composition

Subsidiaries and associated companies within the ING Bank Śląski S.A. Group as at 30 June 2025



*A solid frame line indicates a subsidiary and a dashed frame line indicates an associated company; *the ING Lease (Polska) Group comprises an additional 5 subsidiaries in which ING Lease (Polska) Sp. z o.o. holds 100% of the shares..*

The Bank holds a 40% stake in Dom Data IDS Sp. z o.o. and, through ING Investment Holding (Polska) S.A., holds a 45% stake in Goldman Sachs TFI S.A. and treats these companies as associated companies. Subsidiaries are consolidated by our bank using the full method, and the associated companies (Dom Data IDS Sp. z o.o. and Goldman Sachs TFI S.A.) are accounted for using the equity method. In addition to its subsidiaries and associated companies, the bank holds minority equity investments in the following companies, among others:

- Biuro Informacji Kredytowej S.A. (9.0% of shares),
- Krajowa Izba Rozliczeniowa S.A. (5.7% of shares),
- Polski Standard Płatności S.A. (14.3% of shares).

ING Investment Holding (Poland) S.A.

ING Investment Holding (Poland) is a holding company. Through it, the Bank primarily holds shares in four companies: ING Lease Polska Sp. z o.o. (100%), ING Commercial Finance Polska S.A. (100%), Paymento Financial S.A. (100%) and Goldman Sachs TFI S.A. (45%).

ING Lease (Polska) Sp. z o.o.

ING Lease (Polska) has been present in the market since 1995. Since 2012, it has been a member of the Group of ING Bank Śląski S.A. ING Lease (Polska) offers leasing to finance both movables (in the form of cars, vans, heavy transport vehicles, machinery and equipment, construction, medical, equipment and IT equipment) and real estate. ING Lease (Polska) focuses on modern solutions, digital sales channels and tailoring offers to individual client needs.

The ING Lease (Polska) Group comprises an additional five subsidiaries in which ING Lease (Polska) Sp. z o.o. holds 100% of the shares. The company services are targeted at all market segments: large, medium-sized and small enterprises as well as micro clients (entrepreneurs).

In H1 2025, the company's new leasing production amounted to PLN 3.1 billion (-3.6% y/y). As at the end of June 2025, the company served more than 38,100 clients (up by 3.5% y/y) and the portfolio value was PLN 14.2 billion (+0.6% y/y; based on management accounting data).

ING Commercial Finance Polska S.A.

ING Commercial Finance Polska offers factoring and receivables financing services. The company was founded in 1994 under the name Handlowy Heller. Since 2006, it has been operating under the name ING Commercial Finance, having been integrated into ING Group N.V. Since 2012, it has been part of the ING Bank Śląski Group.

In H1 2025, ING Commercial Finance Polska's turnover amounted to PLN 36.7 billion (+19.9% y/y), representing around 14.9% of the turnover of the entire market. At the end of H1 2025, the company had 9,300 clients (up 11.8% y/y) and had purchased 1.9 million invoices (down 3.7% y/y).

Paymento Financial S.A.

Paymento Financial was founded in 2016 as an initiative by private individuals and an equity infusion by venture capital funds. The company became part of the Bank Group on 31 March 2023 as a result of the acquisition by ING Investment Holding (Polska) S.A. of 100% of the shares from existing shareholders.

The aim of the company is to provide e-commerce transaction processing services to financial market players, particularly in the white-label formula. The company is a regulated entity authorised by the Polish Financial Supervision Authority to provide payment services as a National Payment Institution.

The company entered into a partnership with ING Bank Śląski in 2017. The subject of the cooperation is the development and transaction handling of the imoje payment gateway, the cooperation is being gradually developed. The company also provides services to entities outside our group.

ING Bank Hipoteczny S.A.

ING Bank Hipoteczny S.A.'s strategic objective is to acquire and subsequently increase the share of long-term funding in the balance sheet of ING Bank Śląski S.A. Group through the issuance of mortgage bonds.

The achievement of the set goal will support:

- strengthening the stability of funding in the ING Bank Śląski S.A. Group,
- diversification of funding sources for the existing retail mortgage portfolio,
- matching the term structure of assets and liabilities in the balance sheet of the ING Bank Śląski S.A. Group,
- lowering the cost of financing the conducted lending activity in the part of the loan portfolio financed with other long-term instruments.

As at the end of June 2025, the nominal value of the bank's issued and outstanding mortgage bonds remained unchanged from the end of 2024 and amounted to PLN 500 million.

Mortgage bonds issued by the bank are listed on the Luxembourg Stock Exchange and the parallel market of the Warsaw Stock Exchange. The bank's mortgage bonds can serve as collateral for lombard loan, technical loan and repo operations conducted by the National Bank of Poland.

ING Usługi dla Biznesu S.A.

ING Usługi dla Biznesu was founded in 2012 and offers innovative business services that go beyond traditional banking. The company's main objective is to provide tools that make running a business easier. ING Usługi dla Biznesu currently offers the following solutions:

- ING Księgowość – an invoicing and payment management platform as well as accounting and payroll services for entrepreneurs,
- Firmove – a service supporting would-be and existing entrepreneurs in business creation and development,
- ALEO.com – the largest online database of companies (registration data, financial data).

In H1 2025, ING Usługi dla Biznesu consistently expanded its competences in supporting the acquisition of ING Bank Śląski S.A.'s companies through a number of initiatives aimed at promoting banking products, mainly a company account for sole proprietorships. Initiatives ranged from remote promotion through channels owned by ING UdB, to cooperation with external partners and processes with telephone assistance to help clients set up a business and a company account with ING Bank Śląski S.A.

Nowe Usługi S.A.

Nowe Usługi S.A. conducts educational and marketing activities. In terms of education, it runs the edukacjagieldowa.pl portal. This is a site about investing and the stock market, for both novice and advanced investors. The website publishes investment-related material on an ongoing basis and a knowledge base is available.

Marketing activities are carried out to popularise ING Turbo certificates in the Polish market. These are instruments listed on the Warsaw Stock Exchange, of which ING Bank N.V. is the issuer. The company's main activities include organising marketing campaigns, providing training, operating the ING Turbo helpline or providing technical support for the ingturbo.pl website.

SAIO S.A.

SAIO, the technology *spin-off* of ING Bank Śląski, was established in 2022. The company specialises in the sale and implementation of business process automation solutions based on its proprietary RPA (Robotic Process Automation) platform. We offer the SAIO platform to companies in a wide range of industries – it is successfully used in the areas of sales, finance, accounting, purchasing processes or HR, among others. SAIO provides clients with a full range of automation services and the product guarantees safety, speed of implementation and full control of the implemented robots. SAIO also supports companies in integrating and implementing artificial intelligence (AI) and other modern technologies, enabling them to use them effectively in their day-to-day business operations.

The development of SAIO's business is based on its own resources and cooperation with partners in Poland and internationally.

Goldman Sachs TFI S.A.

Goldman Sachs TFI is the second largest TFI on the Polish market in terms of assets in capital market funds. It is also one of the longest-established investment fund companies in Poland. It has been operating in the local market since 1997. It is authorised by the Polish Financial Supervision Authority to operate. According to data as at the end of June 2025, the company served over 732,000 individuals and institutions and managed assets worth PLN 49.6 billion.

Goldman Sachs TFI S.A. is part of Goldman Sachs Asset Management, a US-based asset management firm. For 150 years, Goldman Sachs Asset Management has provided investment and advisory services to the world's leading institutions, financial advisers and individuals. It benefits from a global network and a wealth of expertise in every region and market of the world. As at the end of March 2025, Goldman Sachs Asset Management managed USD 3.2 trillion of assets worldwide.

Dom Data IDS Sp. z o.o.

Dom Data IDS Sp. z o.o. is a special purpose vehicle created jointly by ING Bank Śląski S.A. and Dom Data AG Sp. z o.o. in order to provide services in a new, expanded formula, which offers much broader cooperation opportunities.

Dom Data AG is a Polish company operating in the IT market and implementing projects both in Poland and in the countries of the European Union. Among other things, it is the author of the Ferryt BPM process platform and additionally provides comprehensive solutions for the banking sector. The intention of the joint venture is to further automate and digitise the Bank's processes, accelerate technology transition, as well as migrate to the public cloud and develop and maintain the Ferryt platform (a lowcode platform for business process automation) and the IWA application.

Changes in the Group's structure

There were no changes in the composition and structure of the ING Bank Śląski S.A. Group in H1 2025.

Awards and distinctions

Our daily efforts in offering attractive products and services to our clients, our attention to high quality service and transparent communication, our sustainability measures and practices, and our outstanding commercial and financial performance are recognised by the market. The following are a selection of awards from the first half of 2025. Their full list is available here.

For overall performance

- ING Bank Śląski was among the “Best Banks of 2024”, in the 14th edition of the “Golden Banker” ranking, including being named the best bank in social media.
- ING was awarded “Benefactor of the Year 2025”, in the category “Successful Cooperation Between Business and Non-Governmental Organisations”. The chapter awarded the prize for cooperation with the Zwolnieni z Teorii Foundation (Free from Theory).
- ING was awarded the title Ethical Company 2024 by the editors of Puls Biznesu. The competition recognises the best role models in business.
- ING Bank Śląski was recognised in the Institution of the Year ranking and received awards in seven categories.
- ING Bank Śląski has been awarded the title of Poland’s Best Employers 2025.
- ING Bank Śląski was honoured by the National Securities Depository for its long-standing commitment to the development of the institution.
- ING was awarded in the 11th edition of Stars of Banking, a competition organised by the Dziennik Gazeta Prawna daily and BCG. First place in two categories: Client Relationship Star and Technology and Innovation Star and second place in the ESG Star category. ING was ranked 2nd in the overall Stars of Banking ranking, summing up its overall performance.
- ING Lease (Poland) has once again been recognised in the “Pearls of Polish Leasing” poll.
- ING Lease (Poland) received the Financial Order from the Gazeta Finansowa weekly for its contribution to the development of digitalisation in leasing on the Polish market.
- ING economists received an award from the editors of the daily newspapers Parkiet and Rzeczpospolita for the most accurate GDP forecast in 2024.
- Brunon Bartkiewicz, CEO of ING Bank Śląski until April 2025, was awarded the “Banker’s Ace” in two categories: “Achievements and achievements in 2024” and “Positive impact on the development of the Polish financial market”. Awarded by the editors of the Bankier.pl portal.
- Brunon Bartkiewicz was awarded the Officer’s Cross of the Order of Polonia Restituta by President Andrzej Duda for his outstanding contribution to the development of innovation and increased competitiveness of the Polish banking sector.
- Brunon Bartkiewicz received the Kopernik Bankowy award for his exceptional contribution to the building and development of a stable, secure banking sector, supporting the economic and socio-economic development of Poland, as well as implementing the principles of banking ethics and promoting economic knowledge in society.

For ESG activities and practices

- ING Bank Śląski has once again been awarded the prestigious Top Employer title. The bank has consistently pursued its mission of creating a friendly, supportive and developing working environment.
- ING received an award in the Equal Opportunities in Business Competition organised by the UN Global Compact Network Poland.
- ING Bank Śląski was awarded the Green and Gold ESG Leaf by Polityka. For the 14th time, Polityka magazine and its partners have honoured Polish leaders committed to sustainable development.
- The ING Grant Programme won first place in the Sustainable Narrative category. The award was presented during the 3rd ESG Compass 2025 Congress.
- A report by the Responsible Business Forum singled out 5 good practices of ING Bank Śląski. The annually published report “Responsible Business in Poland. Good Practices” is the largest overview of CSR and sustainability initiatives in Poland. The results of the report were presented at the Responsible Business Forum’s anniversary conference “Business Transformation – Scenarios for the Future”, organised on the occasion of the organisation’s 25th anniversary.
- ING Bank Śląski, ING Hubs Poland and ING Children's Foundation were among the 15 most advanced employers in diversity and inclusion management in Poland. The list is based on the results of the Diversity IN Check survey.
- The ING Children's Foundation received the CSR Poland Awards 2025 - a distinction for the ING Volunteers project - a programme that has been consistently implemented for many years, involving many people and setting a

good example and standards in the area of supporting children. This is a tremendous distinction for all ING Poland Volunteers who carry out social projects with great commitment.

For communication with clients, the market and employees

- ING Bank Śląski's "These Ends of the World" campaign has been awarded the 2024 YouTube Works Awards Grand Prix.

Our environment

Business environment

International economic environment

As expected, Donald Trump's second term as US President has opened up a period of new geopolitical orders and created heightened uncertainty and risks in the US and global economies. July marked only six months since the inauguration of Donald Trump's presidency, but his actions have triggered very thorough, not always coordinated, changes in US domestic policy (migration, trade, tax or regulatory) and have affected the existing balance between the executive, legislative and judicial branches of government.

Donald Trump decided to leapfrog tariffs on US imports in his first few months in office, motivating these decisions by a desire to rebuild US industry and encourage foreign investment in the US. After imposing so-called "fentanyl tariffs" on China, Canada and Mexico shortly after his inauguration, Donald Trump introduced so-called "reciprocal tariffs" on almost every country in the world, differentiated by rate, at the beginning of April 2025. After suspending higher tariffs for three months for most countries, but following responses and tariff increases from China, US-China tensions escalated. This translated into an increase in the average effective US tariff rate from around 2.5% in early 2025 to almost 30% at the end of April, triggering high volatility in the markets and strong declines in the value of US assets. In mid-May, the US-China trade conflict de-escalated and both sides cut tariffs by 115 p.p., bringing the average US tariff to around 13%. Following the increase in copper tariffs from July 2025, the average tariff rate was around 15%, which is six times higher in July than at the beginning of Donald Trump's term in office.

Donald Trump's return to power was also associated with hopes of a rapid extinguishing of the wars in Ukraine and the Middle East. Despite pressure from the US administration, there has been no agreement on a ceasefire on the Russian-Ukrainian front and July marks three and a half years since the start of the Russian full-scale invasion, which requires foreign financial support for Ukraine. However, global markets and the EU have become independent of energy resources from Russia and the continuation of the war is not causing turmoil in the markets. President Donald Trump took a soft approach to negotiations with Russia, but in July 2025 his rhetoric escalated. He announced increased arms supplies to Ukraine (largely funded by European NATO members) and threatened to impose high tariffs on goods from Russia.

H1 2025 saw a downward trend in global oil prices, which were above USD 80 per barrel at the beginning of the year and hovered around USD 70 in July, although there were strong fluctuations due to the escalation of the Israel-Iran war and the US bombing of nuclear targets in Iran. With decisive intervention by the US, however, Israel's war with Iran in late June and early July lasted only a dozen days and ended with a ceasefire that – for the time being – is being respected.

Moderate global economic conditions and normalisation in commodity markets have supported progress in curbing inflation. Consumer price growth in the US slowed in annual average terms to 3.0% in 2024 from 4.1% in 2023, in the euro area to 2.4% from 5.4% respectively, in Japan to 2.7% from 3.3%, and in China stabilised at 0.2% in 2024, the same as in 2023.

The continuation of the disinflation process, i.e. the lowering of the inflation rate, allowed for a further easing of monetary policy, in particular of the European Central Bank (ECB), in 2025, as inflation in the euro area was on a sustained downward trajectory towards the 2% inflation target. The ECB began a cycle of interest rate cuts in June 2024, and in H1 2025 the ECB deposit rate fell by a total of 100 bps to 2.0% in June 2025 from 3.0% in January. The US Federal Reserve Bank (Fed) began its monetary easing cycle with a 50 bps interest rate cut in September 2024 and cut rates twice at 25 bps in the following months. In 2025, the Fed has adopted a wait-and-see position due to the uncertainty surrounding the new Donald Trump administration's trade policies and concerns about tariffs driving up inflation. As of mid-December 2024, Fed interest rates remain in a range of 4.25%-4.50%.

In 2025, the process of monetary easing began with smaller central banks, including the Swiss National Bank (where rates fell to 0%) and the Czech National Bank. Another ECB cut is possible in September, at which point the interest rate would reach its target of 1.75% for the deposit rate. In the case of Fed policy, financial markets are pricing the next interest rate cut in September or October and another in December. The inflationary effects of Donald Trump's tariff hikes may become apparent in the summer and progress in curbing inflation is not expected until the autumn. The impact of tariff increases on inflation is being debated in the Fed's Open Market Committee. Some of its members do not see any threat from this, but others fear increased pressure on inflation even in 2026.

According to the latest IMF forecasts, US GDP growth will slow markedly to 1.8% in 2025 and 1.7% in 2026 from 2.8% in 2024, while in the eurozone, growth in 2025-26 will be 0.8% and 1.2% respectively after 0.9% in 2024, driven by increased arms and infrastructure spending. After two years of shallow recession in Germany, real GDP growth is expected to be 0.0% in 2025 and accelerate to 0.9% in 2026, driven by fiscal loosening and increased public spending.

ING Group economists expect the cycle of interest rate cuts in the euro area to end in the third quarter of this year, with the ECB deposit rate falling to 1.75%. For the Fed, interest rate cuts to 3.75-4.00% are forecast by the end of the year, with the monetary easing cycle continuing into 2026. The monetary policy outlook of other central banks remains mixed. Some (Switzerland) have completed interest rate cuts, others (UK, Australia) will continue them, and a period of monetary cost increases lies ahead for some (Japan).

Almost at the start of the year, the euro-dollar exchange rate began an upward trend, rising from 1.03 to almost 1.18. Such a dynamic strengthening of the euro was due to hopes of a revival of the German economy, supported by the new government's fiscal package, as well as the dollar's overvalued concerns surrounding the Donald Trump administration's economic policies. The trend of the euro strengthening against the dollar was at the same time supportive of the strengthening of the CEE currencies, including the zloty. In addition, the Polish currency benefited from positively outstanding economic performance compared to the region, but also economic forecasts, as well as relatively high NBP interest rates or the inflow of EU funds, including from the National Recovery Plan.

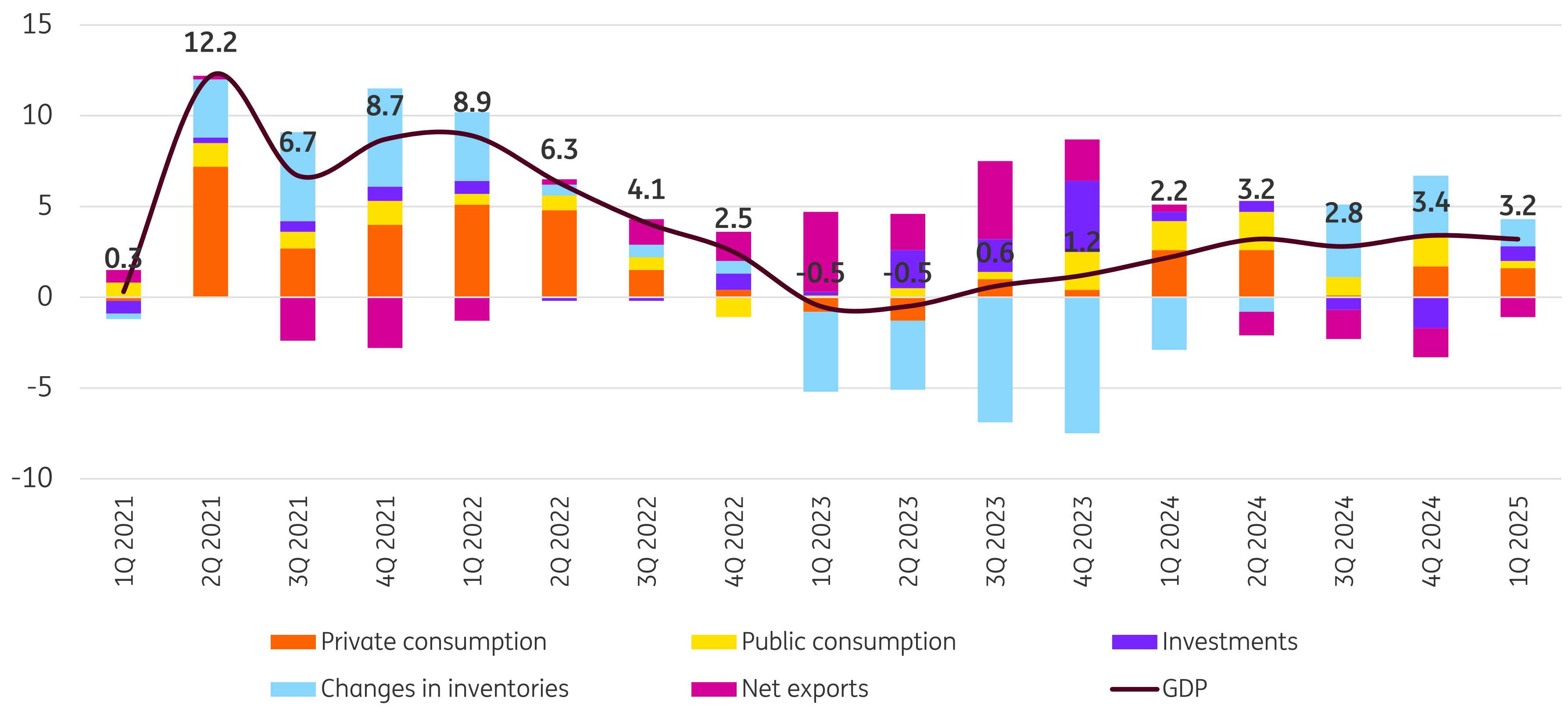
At the time, CEE government bonds were undergoing significant changes. The main determinant of the direction of change remained the outlook for monetary policy (Poland, Czech Republic, Hungary), although for some markets (Romania, Poland), political factors (the presidential election) periodically raised volatility. While the monetary outlook will remain key for sovereign debt of countries in this part of the region, the room for change on this account remains limited given advanced interest rate cycles or their market pricing. In the face of ongoing disinflation, the fiscal outlook of countries as an element in the pricing of government bonds may become more important.

Core trends in Poland's economy

Gross Domestic Product

H1 2025 saw a continuation of Poland's economic recovery, although its pace slowed slightly in Q1 compared to Q4 2024. In Q1 2025, Gross Domestic Product increased by 3.2% y/y, compared to an increase of 3.4% y/y in the fourth quarter of 2024. The slightly lower annual GDP growth rate than in the last quarter of last year was due to a smaller positive contribution from the change in inventories (1.7 p.p., vs. 3.4 p.p. a quarter earlier) and total consumption (2.0 p.p., vs. 3.3 p.p.). Growth in government consumption slowed to 2.0% y/y in Q1 2025 from 7.6% y/y in Q4 2024, and household consumption to 2.5% y/y from 3.5% y/y respectively. In the latter case, this was, inter alia, due to the postponement of Easter. In 2024, the majority of Christmas spending occurred in Q1 and in 2025 in Q2, as evidenced by, inter alia, monthly retail merchandise sales data. A positive development in early 2025 was the rebound in investment. Gross fixed capital formation increased by 6.3% y/y in Q1, following a 6.9% y/y decline in the Q4 of the previous year, mainly due to an increase in public sector investment activity. A faster recovery at home than abroad meant that imports of goods and services continued to grow faster than exports (0.6% y/y vs. 1.7% y/y), and the deterioration in the foreign trade balance made a negative contribution of 1.1 p.p. to GDP growth in Q1 2025.

Breakdown of GDP growth (%)



Source: CSO, projection by ING.

ING Bank Śląski economists estimate that Q2 2025 will bring a further improvement in the economy and an acceleration of annual GDP growth above 3% y/y (from 2.9% in 2024). The monthly data suggest an acceleration in private consumption, accompanied by further growth in investment, although probably at a slower pace than in Q1 2025. For 2025 as a whole, economic growth is forecast to be above 3% y/y (up from 2.9% in 2024), which should be supported by an acceleration in consumption following the robust growth in household disposable income in 2024, which has been used in significant part to build savings and could fuel consumer spending in subsequent periods. Consumption is likely to grow by around 3.6% this year, following an increase of 3.1% last year. At the same time, after declining by 2.2% in 2024, investment could increase by around 7.0% in 2025, mainly due to the support of public investment funded by the National Recovery Plan (NRP) and projects under the 2021-27 financial perspective. The role of stock changes in generating GDP growth should be slightly less in 2025 than in 2024, and the magnitude of the negative impact of the deterioration in the foreign trade balance should be similar to that in 2024.

Labour market and salary levels

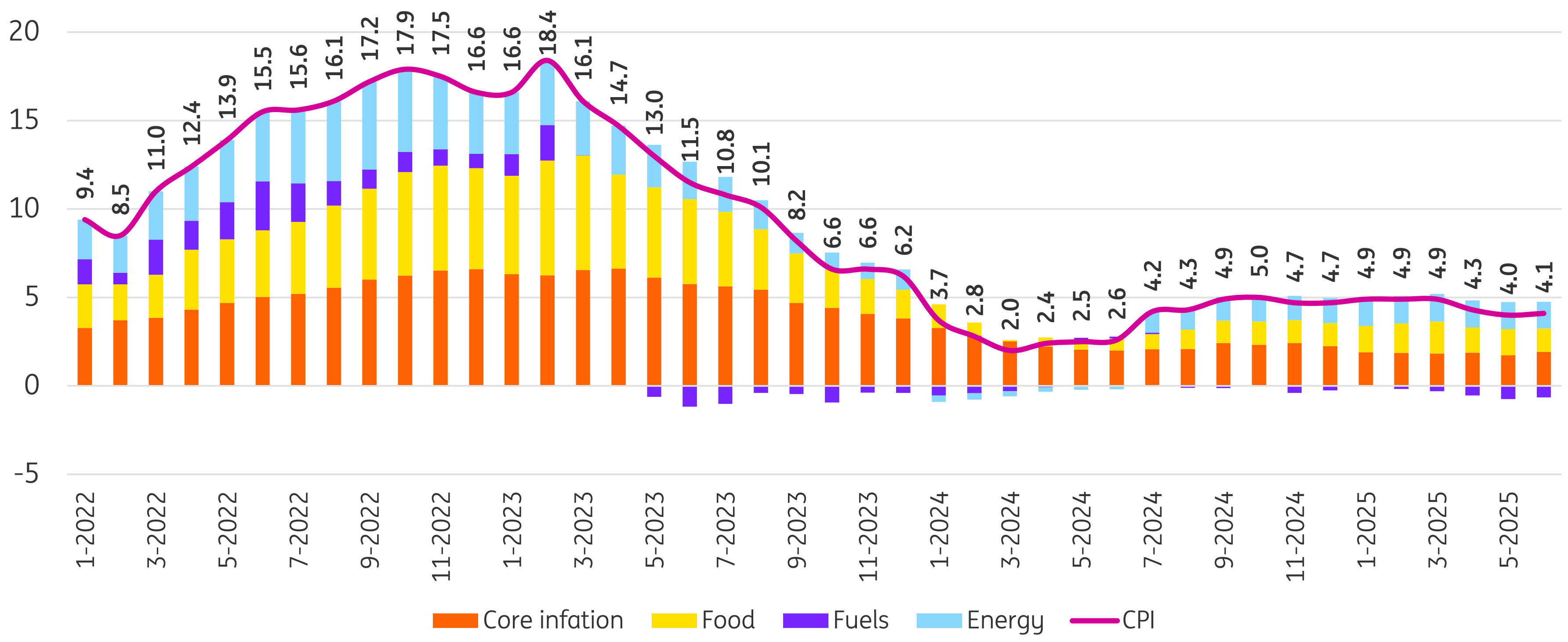
In H1 2025, a slight decline in labour demand was observed, which was reflected, inter alia, in a falling number of vacancies (65.4 thousand in May 2025 compared with 86.4 thousand in May a year earlier), a lower level of employment in the enterprises sector (in May, the number of people employed was 55 thousand lower than a year earlier, a decrease of 0.8% y/y), or an increase in the time taken to look for a new job (to 3.3 months in Q1 2025 from 2.8 months in the previous year, according to Randstad surveys). Despite the limited number of new recruitments and the decline in employment, the unemployment rate remains at one of the lowest levels among European Union countries. According to the Labour Force Survey (LFS), in Q1 2025 it stood at 3.4% (compared to 3.1% in Q1 2024), while according to the Ministry of Family, Labour and Social Policy, the registered unemployment rate in June 2025 stood at 5.1% (compared to 4.9% in June 2024). The explanation for the formation of the unemployment rate close to historical minima is the unfavourable demographic trends leading to a decrease in labour supply. LFS data shows that in Q1, the working-age population was 123,000 lower than a year ago (down 0.6% y/y), while CSO data shows that in April the population was 160,000 below the level of a year ago (down 0.4%). Due to the projected recovery and demographic changes, ING Bank Śląski economists expect the registered unemployment rate to remain around 5% and the LFS unemployment rate to remain close to 3%.

With inflation expected to return to target in H2 2025, lower labour demand and reduced enterprise profitability, ING Bank Śląski economists forecast that wage growth in the enterprises sector in 2025 will be 8%, a strong decline after three years of double-digit growth. In the following year, wage dynamics should decline further to 6.5%. A slowdown in wage dynamics is also indicated by surveys of enterprises, in which both the share of companies planning to raise wages and the planned scale of increases are falling. An important factor for the scenario of slowing wage dynamics will be the findings regarding the level of the minimum wage in 2026, which, according to the assumptions of the draft budget act for 2026, indicate a 3% increase to PLN 4 806.

Inflation

The beginning of 2025 saw inflation rise to around 5% y/y on the back of a low reference base and the partial unfreezing of household electricity prices from July 2024. In Q2 2025, there was a decrease in inflation due to the expiry of the effect of the reintroduction of VAT on food from April last year. In addition, pressure from core inflation excluding food and energy prices has decreased, which stood at 4.0% y/y at the end of 2024 and declined to 3.4% y/y in June 2025. This was accompanied by a marked y/y decline in fuel prices and relatively stable annual food inflation. In June 2025, the headline consumer inflation index (CPI) was 4.1% y/y, up from 4.7% y/y at the end of 2024.

Inflation (CPI) – breakdown (%)



Source: CSO, projection by ING.

According to ING Bank Śląski economists, in H2 2025, CPI inflation will fall to a range of 2.5%-3.0% y/y and will thus be within the range of acceptable deviations from the National Bank of Poland's (NBP) inflation target of 2.5% (+/- 1 p. p.). This will be supported primarily by the expiry of the base effect associated with the partial unfreezing of electricity and natural gas prices for households. As of July 2025, new lower natural gas tariffs for residential clients are in force, and the maximum price for household electricity of 500 PLN/MWh net has been extended to Q4 2025. Economists at ING Bank Śląski estimate average annual inflation in 2025 at 3.5%, and expect it to fall to 2.5% on average in 2026.

Situation on global financial markets

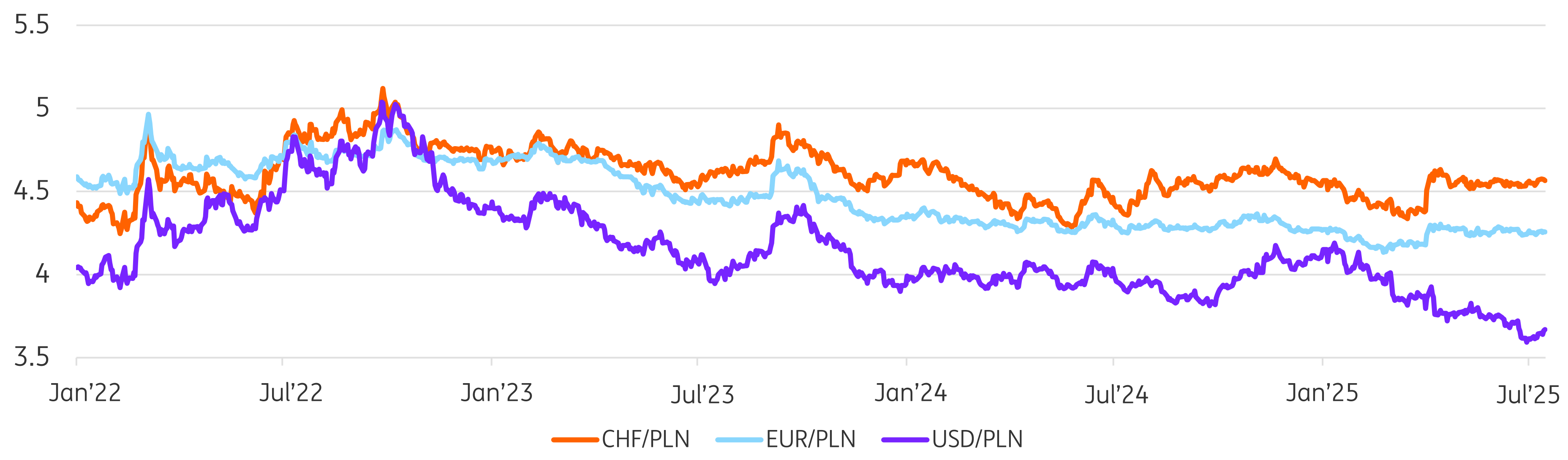
The valuation of the zloty against the euro has remained stable in recent quarters. Almost since 2024 – excluding short episodes – the EUR /PLN exchange rate has been concentrated in a range of 4.23-4.35. The Polish currency benefited from relatively high NBP interest rates, an optimistic economic outlook and less investor attentiveness to the geopolitical risks accompanying the war in Ukraine. The above factors were neutralisers of unfavourable news from the external environment for emerging market currencies. This year, the primary threat to currency stability is trade wars. Despite this, the zloty – partly due to its relatively lower trade exposure to the USA than countries in this part of the region – remained relatively stable. In addition, the actions of BGK exchanging some of the funds from the National Recovery Plan directly in the market were a factor limiting the overvaluation of the zloty in periods of heightened risk aversion. Other PLN exchange rates showed significantly greater volatility, reacting to global shifts in the value of the US dollar and Swiss franc. The USD/PLN exchange rate, for example, was at its lowest level since 2018 after falling by almost 14% in the first half of the year.

According to economists at ING Bank Śląski, the outlook for the Polish currency remains moderately optimistic. The EUR/PLN exchange rate should extend the narrowing sideways trend (4.20-4.30), although probably closer to its upper limit as the quarter progresses. This will be due, inter alia, to worsening *carry trade* conditions in the face of expected NBP interest rate cuts amid the near end of the euro area cycle. Periodically, nervousness in the zloty market may be reinforced by the fiscal outlook or the gradually deteriorating domestic current account balance. Still, the solid economic performance together with the expected accumulation of disbursements from the National Recovery Plan (NRP) in 2026 will be decisive for the value of the zloty.

In recent months, due to the different timing of monetary policy in Poland and the euro area (the MPC lowered interest rates when the ECB cycle was well under way), changes in the underlying markets have been a factor limiting the upside potential of Polish debt yields. They stabilised the upward pressure on yields resulting from the record high borrowing needs of the state budget and the traditional accumulation of debt supply in the first months of the year. It was only as the funding of borrowing needs progressed and the MPC's narrative changed that the yields on government bonds declined.

According to ING Bank Śląski economists, the trend of falling yields on treasury securities should continue. At the same time, we anticipate a steepening of the yield curve. The short end will follow the NBP's interest rate cuts, while bonds with longer maturities will react to lingering concerns about fiscal consolidation in the medium term and the actions of the major central banks (Fed, ECB).

PLN exchange rates



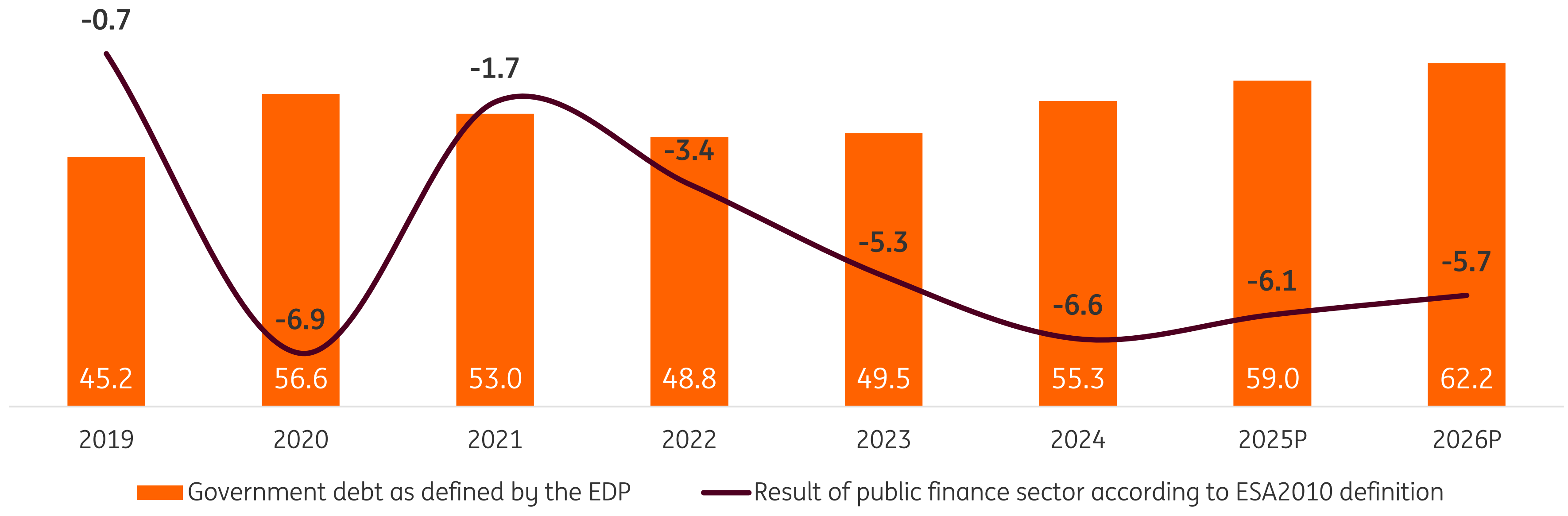
Source: NBP.

Public finances

2025 is another year in which fiscal policy remains expansionary. The scale of the fiscal imbalance in 2024 turned out to be higher than earlier government projections, with the general government deficit at 6.6% of GDP, proving higher than earlier government forecasts. At the end of 2023, the so-called "general exit clause", which suspended the functioning of the European fiscal rules under the Stability and Growth Pact for the duration of the pandemic, expired. In April 2024, the European Council adopted new, reformed rules for the coordination of fiscal policies in EU member states. In July 2024, the Council identified the existence of an excessive deficit in Poland on the basis of a deficit of 5.3% of GDP in 2023. This resulted in the imposition of the so-called "excessive deficit procedure" on Poland. In October, the Polish government presented a medium-term fiscal and structural plan in which the authorities committed to correcting the excessive deficit by 2028. In January, the European Council recommended that Poland correct its excessive deficit by 2028 and set a maximum path for nominal net fiscal expenditure for 2025-28. In April 2025, Poland – along with 11 other EU countries – requested the activation of the so-called national exit clause as part of the ReArm Europe package presented in March, which gives member states more fiscal space for increased defence spending and allows for deviations from the recommended public spending paths (up to 1.5% of GDP per year until 2028) under the excessive deficit procedure.

ING Bank Śląski economists forecast that the general government deficit will continue to exceed 6% of GDP in 2025 and will be slightly below this limit in 2026. As a result, we will see a further build-up of public debt to 59.0% of GDP in 2025 and 62.2% of GDP next year. Among other factors, the increasing indebtedness of budget funds at the Bank Gospodarstwa Krajowego (BGK), including the COVID-19 Fund, contributes to the accumulation of public debt.

Public debt and budget deficit according to EU methodology (ESA2010; %)



Source: CSO, projection by ING.

Monetary policy

Economists at ING Bank Śląski believe that the MPC will continue its cycle of interest rate cuts this year and next year. Comments from the MPC suggest that further cuts will occur in the coming months. The main argument in favour of monetary easing remains the disinflation trend, including the near fall of CPI inflation around the central bank's target. Moreover, forecasts indicate that the process of inflation returning to the NBP's acceptable range of fluctuations will be sustained. In such a situation, the MPC will reduce concerns about the impact of fiscal policy, the labour market situation and electricity prices on inflation. ING Bank Śląski economists believe that the reference rate will fall to 4.25% at the end of this year and 3.50% in 2026. The expected interest rate target is in line with the NBP President's statements. The risk to such a scenario remains a possible deterioration of growth prospects under the impact of global trade wars.

Summary

Some 3.5 years after the start of the Russian war in Ukraine, the European and Polish economies remain practically independent of Russian energy supplies. However, overcoming the 2022-2023 energy crisis required costly diversification of supply and new investments in energy infrastructure, including expansion of power capacity and networks, and resulted in high inflation and erosion of real household incomes, especially in 2023. Increased prices for energy carriers have challenged the international competitiveness of industry, and Poland is one of the EU countries with a relatively high share of industry in the value-added structure.

The European and Polish economies experienced a recovery in 2024, after a weak 2023, but the rebound during 2024 was quite gradual. H1 2025 saw its continuation, with the eurozone economy benefiting from an acceleration in orders amid fears of Donald Trump's tariff increases in Q1 2025(*frontloading*). However, Q2 was a return to economic stagnation in the euro area with reduced industrial activity and still weak consumer confidence indicators and an elevated saving rate. However, the gradual recovery scenario was realised in Poland and growth in Q2 probably accelerated slightly compared to 3.2% y/y in Q1 2025, but was mainly based on private consumption and public investment. The latter are supported by defence spending, while consumption is supported by solid nominal wage growth and falling inflation.

Faced with persistent external security risks from Russia and a reduced US military and financial commitment, the European Union has adopted the Re-Arm Europe / Readiness 2030 package, targeting EUR 800 billion in defence spending by 2030. Its implementation will lead to a doubling of EU defence spending and the mobilisation of defence spending to 3.5% of GDP and an additional 1.5% of GDP for other security-related expenditure categories. At the NATO summit in The Hague in June, member states pledged to increase this spending to 5% of GDP by 2035. This target will not be a challenge for Poland, which has been among the countries with the highest defence spending as a proportion of GDP for several years.

The war in Ukraine, geopolitical tensions and trade wars remain a major source of uncertainty for the prospects of the European and Polish economies. The scenario of an end to the war in Ukraine still seems remote, and Ukraine needs further financial and military support from Europe in light of the reduction in US involvement.

ING Bank Śląski economists expect a gradual improvement in Poland's economy in 2025, allowing growth to accelerate from 2.9% in 2024 to above 3% in 2025 and 3.4% in 2026. These are a favourable outlook in the face of weaker global industry (due to trade wars) and sluggish growth in the Eurozone, particularly in Germany. The economy of our largest trading partner should benefit from the Friedrich Merz government's fiscal stimulus in 2026. The recovery in Poland will be mainly based on the recovery of domestic demand, particularly consumer demand, thanks to solid real wage growth. After a 2.2% drop in investment spending in 2024, ING Bank Śląski economists expect investment to rebound in 2025 to 7.0% and to grow at a similar rate in 2026. This will be linked to an increase in the disbursement of EU funds (from the National Recovery Plan and cohesion funds) to final beneficiaries. However, a revival of private investment and a change in Poland's economic growth model are necessary to maintain economic growth in Poland in the medium term.

The need for changes in EU policies (level playing field with Asia, ambitions in climate policy, ESG requirements), national policies and company practices is indicated by a recent report by ING Bank Śląski economists on the drivers of Polish economic growth, based on more than 50 in-depth interviews with Polish business leaders, prepared in cooperation with the organiser of the European Economic Congress in Katowice. Continuing the process of catching up with the EU average income requires, inter alia, deregulation of the economy, support for innovation, scaling of economic activity and internationalisation of Polish business, and a deepening of the financial market, including greater availability of forms of finance with a greater appetite for risk.

With a difficult external environment and heightened security risks and geopolitical tensions, an opportunity for Polish companies will be to invest in the production potential of the defence industry and related other industries. At the enterprise level, an adequate response to negative demographic trends will be to invest in labour-saving technologies – automation, robotisation or the implementation of artificial intelligence (AI) solutions. With a low level of private debt in relation to GDP, the banking sector has room for significant credit growth and can act as a catalyst to change Poland's growth model in favour of greater investment and innovation.

Macroeconomic projections

	2022	2023	2024	2025P	2026P
GDP growth (%)*	5.3%	0.2%	2.9%	3.5%	3.4%
General government deficit according to EU methodology (% of GDP)	3.4%	5.3%	6.6%	6.1%	5.7%
General government sector debt according to EU methodology (% GDP)	48.8%	49.5%	55.3%	59.0%	62.2%
Average annual inflation (CPI) (%)	14.4%	11.4%	3.6%	3.5%	2.5%
Unemployment rate (%; CSO)	5.2%	5.1%	5.1%	5.1%	5.0%
USD/PLN exchange rate (year-end)	4.40	3.94	4.10	3.60	3.56
EUR/PLN exchange rate (year-end)	4.68	4.33	4.27	4.25	4.27
WIBOR 3M (year-end)	7.02%	5.88%	5.84%	4.25%	3.63%

** The GDP growth forecast for 2025 was revised from 3.2% to 3.5% on 11 July this year.*

Financial market

We look at sector data, just like our business, broken down into two segments:

- retail segment:
  - individuals;
- corporate segment:
  - individual entrepreneurs,
  - individual farmers,
  - enterprises,
  - non-profit institutions serving households,
  - non-monetary financial institutions,
  - local government institutions and the Social Security Funds (FUS).

Banking sector

Liabilities

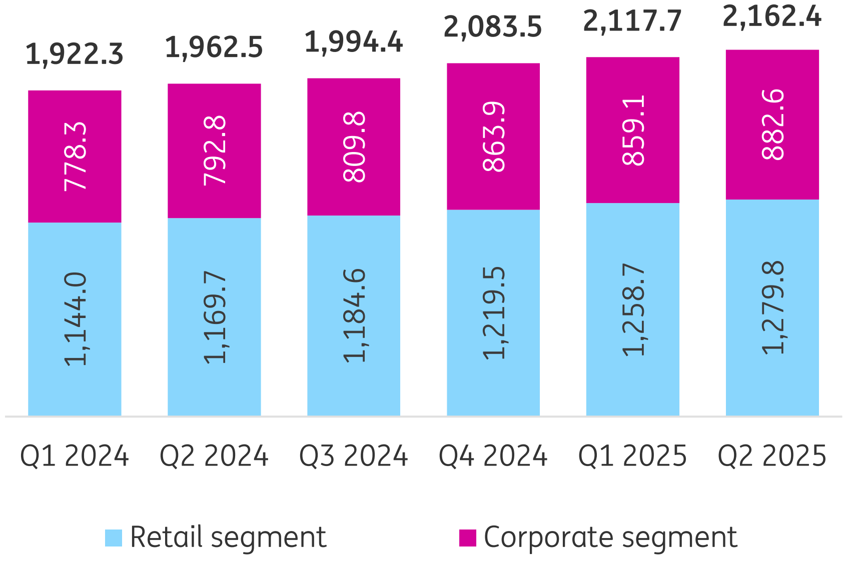
As at the end of June 2025, the basic cash categories were as follows:

- Total liabilities increased by 10.2% y/y to a total of PLN 2,162.4 billion (up by PLN 199.9 billion y/y) and were characterised by higher growth rates on the deposit side of the retail segment than the corporate segment.
- Liabilities to the retail segment reached PLN 1,279.8 billion, an increase of PLN 110.1 billion y/y (+9.4% y/y) compared to the end June 2024.
- Liabilities to the corporate segment amounted to PLN 882.6 billion, i.e. they were 11.3% higher than as at the end of June 2024. The y/y increase in volume by PLN 89.8 billion was achieved primarily due to an increase in liabilities to enterprises (+11.9%, i.e. by PLN 57.3 billion to PLN 539.3 billion), an increase in liabilities to local government institutions and the Social Insurance Fund (PLN +24.1 billion, +26.2% y/y to PLN 116.1 billion) and an increase in liabilities to non-monetary financial institutions (PLN +7.0 billion, +11.2% y/y to PLN 69.9 billion). Small increases in nominal terms were also recorded in corporate deposits (PLN +2.5 billion, +3.0% y/y).

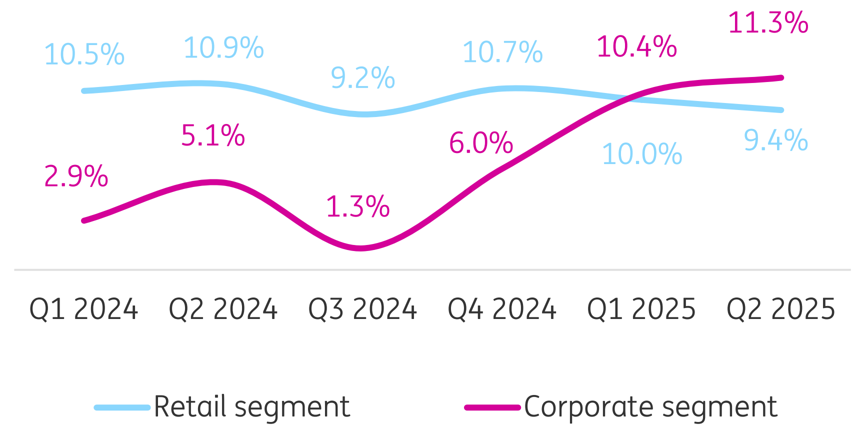
Receivables

- Total receivables at the end of June 2025 increased by 4.7% y/y (up by PLN 65.3 billion to a total of PLN 1,455.3 billion). The growth in the client receivables portfolio was driven by the momentum achieved in both the retail and corporate segments.
- Receivables from the retail segment reached PLN 727.9 billion in June 2025, 3.5% higher than a year ago. Housing loans, which form the main part of banks' credit exposure to the retail segment (they account for 68.8% of receivables from this group of clients, up from 69.6% a year ago), increased by 2.4% to PLN 500.9 billion. At the end of June 2025, the portfolio of PLN housing loans reached PLN 451.5 billion, up by PLN 28.1 billion y/y. Mortgage sales alone – based on NBP data – amounted to PLN 34.6 billion in the first five months of 2025 (-12.5% y/y). The portfolio of FX housing loans fell by PLN 16.3 billion y/y to PLN 49.4 billion due to the natural depreciation of the portfolio and the incurring of provisions for the legal risk of this portfolio and the implementation of settlement programmes with clients by banks. Other retail loans, including consumer loans, increased by 6.1% (by PLN 13.0 billion) compared to June 2024 to reach PLN 227.1 billion. Sales of other retail loans – based on NBP data – amounted to PLN 64.4 billion in the first five months of 2025, an increase of 29.6% y/y.
- Receivables from corporate clients increased by PLN 40.5 billion (+5.9% y/y) to PLN 727.4 billion by June 2024. Receivables from enterprises alone rose by PLN 30.6 billion (+7.7% y/y) to PLN 428.2 billion. Sales of loans to non-financial enterprises – based on NBP data – amounted to PLN 79.3 billion in the first five months of 2025, down 3.3% y/y. Receivables from individual entrepreneurs declined, with their balance falling by 8.3% y/y (PLN -4.3 billion) to PLN 47.7 billion.

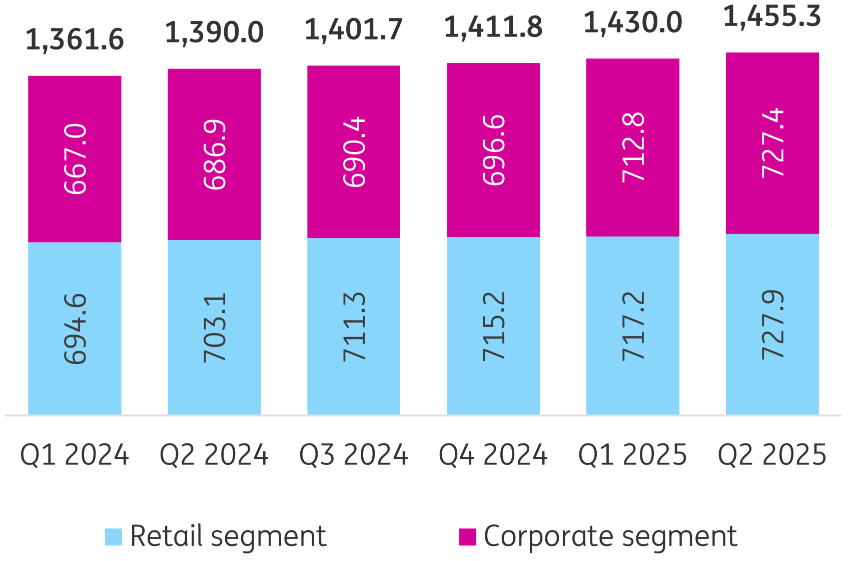
Balance of liabilities* (PLN billion)



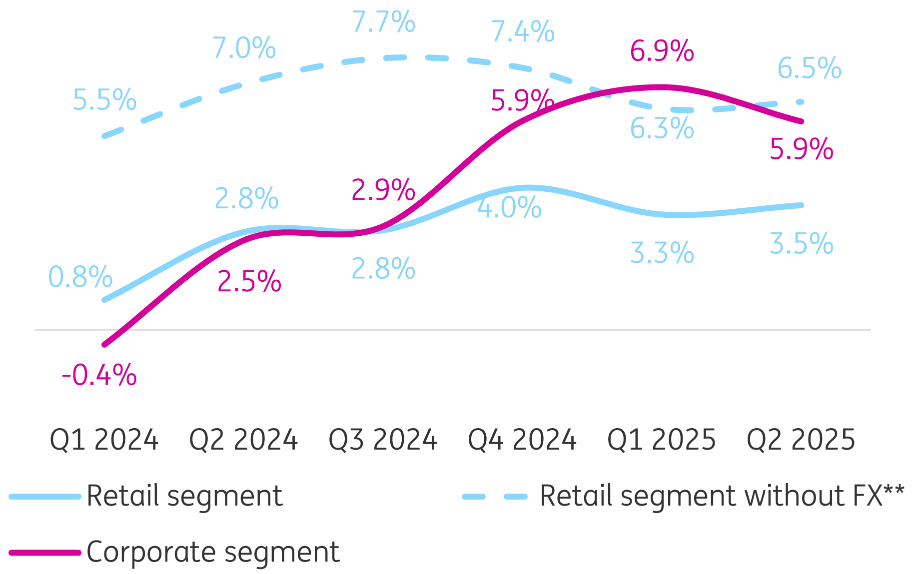
Growth rate of balance of liabilities*



Balance of receivables* (PLN billion)



Growth rate of balance of receivables*



** Based on NBP data; ** excluding foreign currency mortgage loan portfolio.*

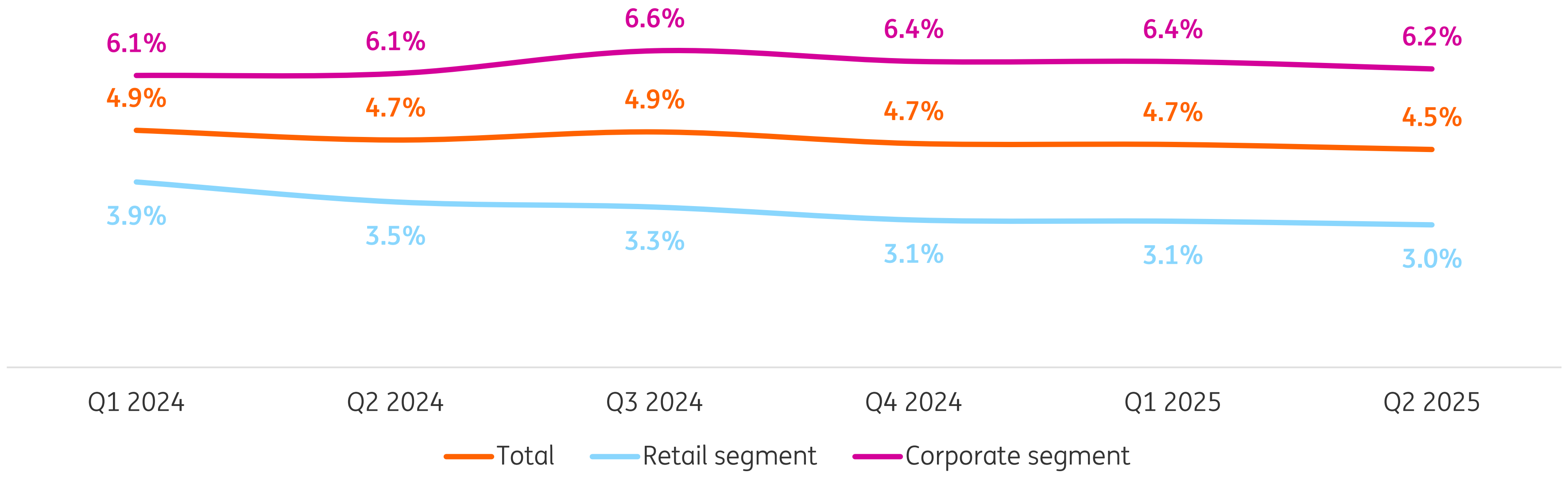
Asset quality

In terms of asset quality, in May 2025 the share of Stage 3 loans in total loans measured at amortised cost was 4.5% (-0,1 p.p compared to December 2024).

Asset quality in the retail segment was 3.0%, a slight improvement on the end of 2024. a slight improvement compared to the end of 2024 (-0.1 p.p.), as a result of higher quality for both real estate loans (down from 1.7% at the end of 2024 to 1.6% in May 2025) and other retail loans (-0.2 p.p. compared to the end of 2024).

In the corporate segment, the share of Stage 3 and POCI exposures was 6.2% at the end of May 2025, down 0.2 p.p. from the end of 2024.

Share of receivables at Stage 3



Source: estimates based on PFSA's data; data for May 2025 for Q2 2025.

Financial results

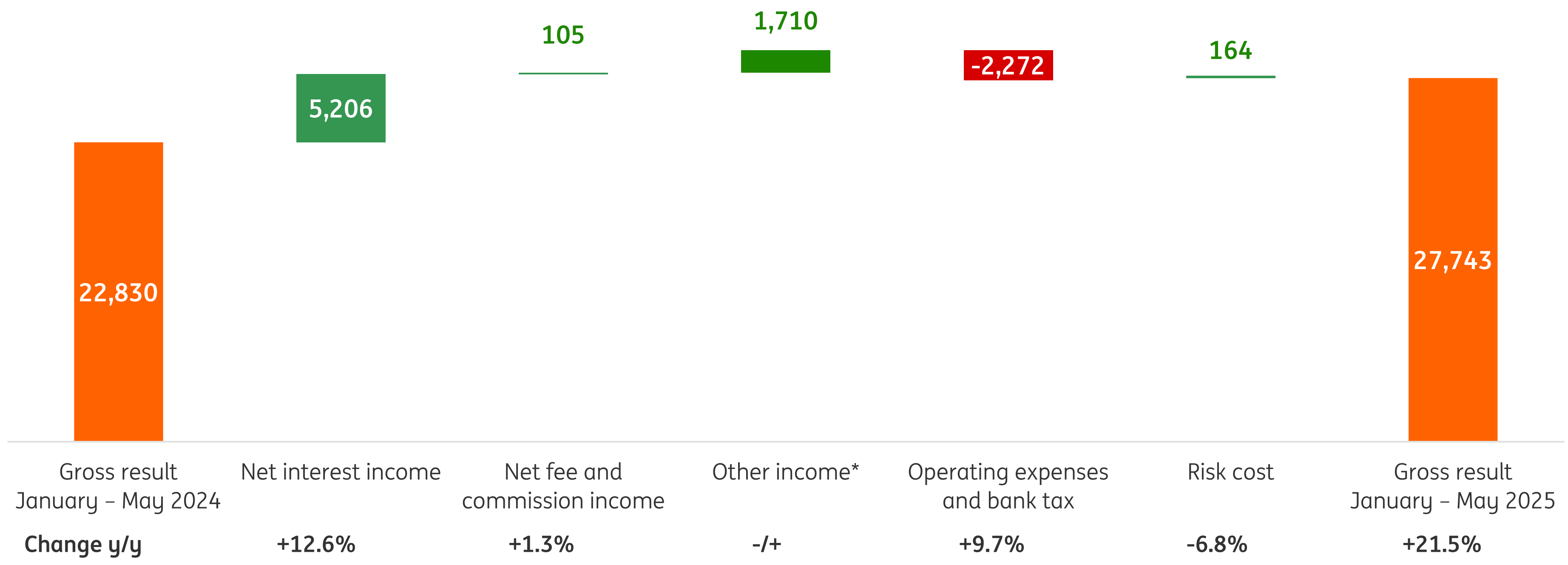
In the first five months of 2025, the banking sector's net profit increased to PLN 21.0 billion compared to PLN 17.4 billion in the same period of 2024. The banking sector's pre-tax result amounted to PLN 27.7 billion and was 21.5% higher vs. the first five months of 2024, mainly as a result of higher interest income (+12.6% y/y), with a negative impact of rising operating costs (+9.7% y/y). It should be noted that the sector's interest margin was at a marginally lower level in the 2025 period under review compared to the same period last year. In contrast, the C/I ratio in the first five months of 2025 was 46.1%, which was approximately 2 p.p. lower vs. 2024.

Fee and commission income was 1.3% higher in January-May 2025 compared to the first five months of 2024, while other income was PLN 1.7 billion higher, due, among others things, to lower provisions for the legal risk of FX mortgage loans.

The aforementioned increase in operating costs was mainly due to an increase in staff costs (+8.9%) – the effect of wage pressures – as well as an inflation-driven 11.7% y/y increase in material costs (including bank tax).

Risk costs were 6.8% lower y/y.

Change drivers for gross result of the banking sector in January – May 2025 (PLN million)



*Source: estimate based on PFSA data; *including share in profits of associates.*

Capital market

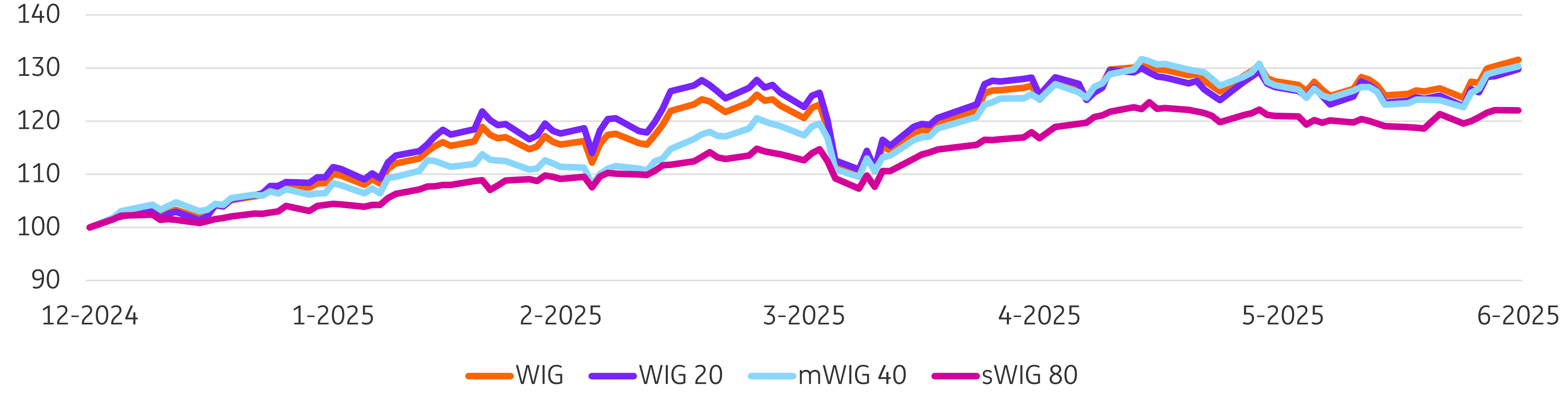
Warsaw Stock Exchange (WSE)

The main indices on the Warsaw Stock Exchange ended H1 2025 at a higher level than at the end of 2024. The broad market index, the WIG, has gained 31.6% compared to the end of 2024. In contrast, the index grouping the largest capitalisation companies, the WIG20, gained 29.8% and the mWIG40 gained 30.3%. The index of smaller companies – the sWIG80 – also ended H1 2025 in positive territory – gaining 22.0% compared to the end of 2024.

At the end of June 2025, 408 companies were listed on the WSE Main Market, including 43 foreign companies. The capitalisation of domestic companies amounted to PLN 951.0 billion, 29.9% higher compared to the end of 2024. The combined capitalisation of domestic and foreign companies amounted to PLN 2,040.7 billion, an increase of 36.8% from the end of 2024. There were three IPOs in the past six months, while six other companies were delisted.

H1 2025 was characterised by a marked increase in turnover on the Main Market. The value of session trading in shares, rights to shares and pre-emptive rights increased by 41.9% y/y to PLN 242.7 billion. The value of total turnover (including block trades) increased by 44.1% to PLN 252.6 billion.

Major WSE indices in H1 2025 (30 December 2024 = 100)



Source: Warsaw Stock Exchange (WSE).

Investment funds

At the end of June 2025, the assets of investment funds (based on IZFiA data) amounted to PLN 381.7 billion (+0.6% vs. the end of 2024). The slight increase in mutual fund assets of PLN 0.8 billion compared to the end of 2024 was due to a significant decrease in dedicated funds by PLN 39.1 billion compared to the end of 2024 to PLN 86.7 billion. The value of funds held in non-dedicated funds (available to a wide range of investors) increased by PLN 41.5 billion (to PLN 294.9 billion) vs. the end of 2024.

Within non-dedicated funds (excluding Employee Capital Plans), in H1 2025, in nominal terms, asset values gained primarily debt and cash funds (PLN +24.3 billion), followed by equity funds (PLN +4.4 billion) and mixed funds (PLN +2.9 billion) – a result of the scale of their popularity among clients and the size of funds under management.

Each of the months of H1 2025 was characterised by positive net inflows totalling PLN 19.9 billion. In comparison, net receipts in H1 2024 stood at PLN 22.3 billion

Source: Chamber of Fund and Asset Management Companies.

Open-End Pension Funds

At the end of June 2025, the assets of the Open Pension Funds (OFEs) amounted to PLN 264.6 billion, 51.5 billion (+24.2%) more than at the end of 2024. As at the end of June 2025, 90.8% of these assets consisted of shares of domestic and foreign issuers (89.3% at the end of 2024).

Source: Polish Financial Supervision Authority.

Employee Capital Plans

Based on data from the Employee Capital Plan Register, these funds had accumulated PLN 38.17 billion in assets at the end of June 2025 in a total of 4.75 million Employee Capital Plan accounts (PLN 30.24 billion and 4.43 million respectively at the end of 2024). At the end of June 2025, 333,000 entities allow their employees to save for their retirement through Employee Capital Plans, and participation in the programme was 53.72% (61.89% in the private sector and 30.50% in the public sector).

Source: mojeppk.pl

Our activity

Our business model

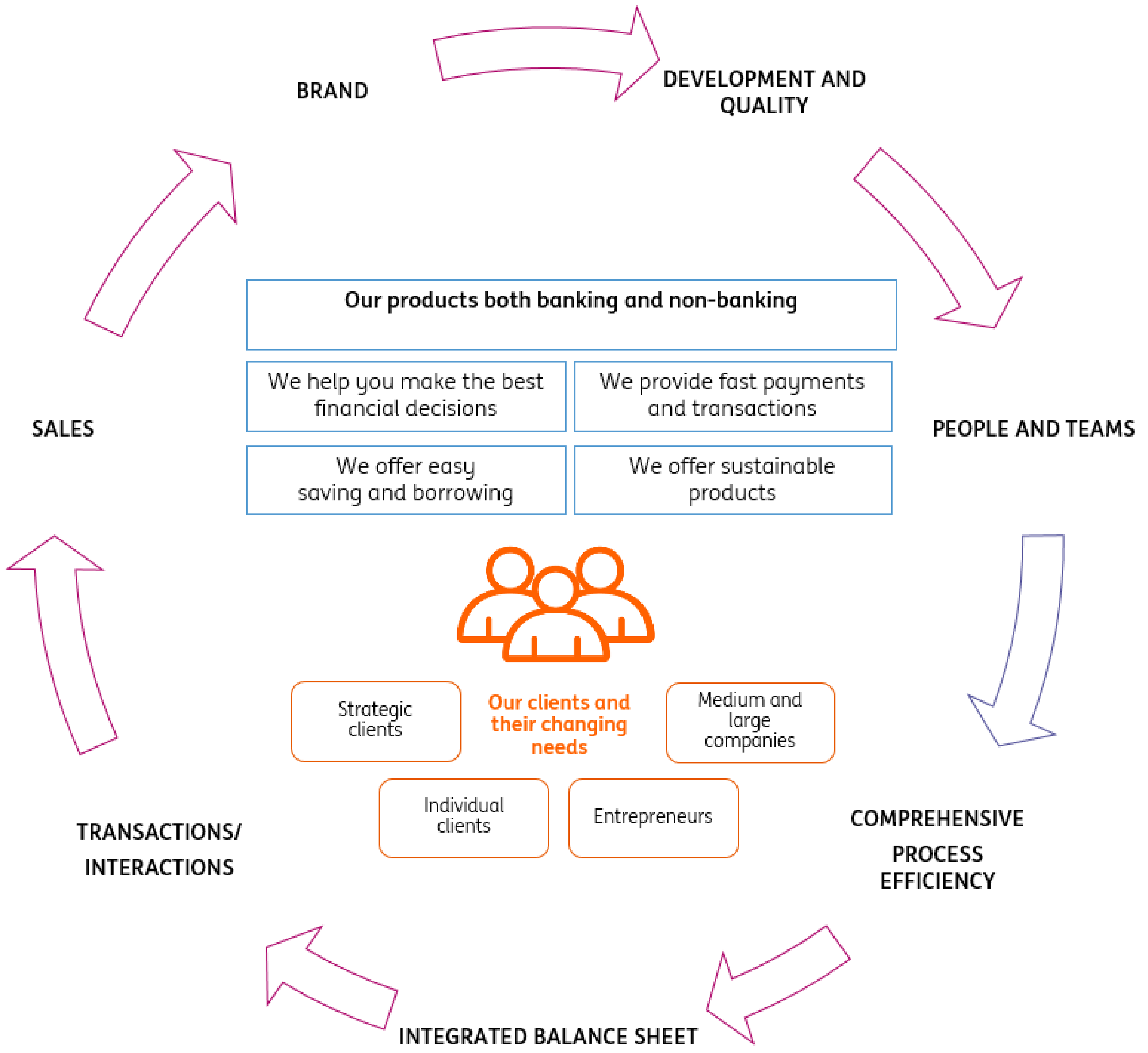
We are a universal bank which, together with the other companies in its group, serves both individual clients and companies as part of its operations. We want to be seen as the **bank of the future for entrepreneurial people** – a bank that provides its clients with practical solutions that they need and are happy to use. We want people to be able to achieve their goals with our support.

Our mission is to **support and inspire people to be one step ahead in life and business.** As a bank, we support our clients in their financial decisions by, inter alia, providing knowledge and tools as well as simple, useful and tailored solutions and services.

Our core business is, on the one hand, to enable our clients you to save money safely and efficiently and, on the other hand, to finance loans. The financing granted supports purchases of housing, opening business activity or development of companies. We develop and offer products to support sustainable operations for both individuals and companies. In this way, we support the development of the economy and society.

We offer our clients banking products and services (such as loans or savings accounts and transfers), but also in the area of *beyond banking*, i.e. not related to traditional banking. Our expertise allows us to build a positive client experience. It is not solely insurance products, accounting services or investment products. We offer our clients a broad range of tools for financial management.

As the bank of the future, **we implement innovations** to meet the needs of our clients. We also use *big data* and artificial intelligence and cooperate with fintechs to reach beyond. We take care that our payment and transactional systems are effective. At the same time – with the growing popularity of cashless trading – an efficient electronic payment system is becoming increasingly important. We provide our clients with transactional banking, processing transfers, card, phone or BLIK payments and developing tools for cashless payments. To this end, we have provided specific solutions to support the development of e-commerce, such as the imoje payment gateway – the first online payment for online shops offered by a bank in Poland.



For us electronic and mobile banking are the core interaction channel with both retail and corporate clients. We want our clients to have tools that enable them to make modern payments and remotely deal with simple issues such as paying for public transport tickets, parking and motorway journeys. Our electronic banking also allows you to deal with official matters more conveniently, e.g. you can submit applications for social benefits.

We also note the changing role of bank branch offices. That is why, for several years now, we have no longer been talking about branches, but about meeting places. These are places where our advisers help clients to make important decisions – whether in everyday banking, improving their living conditions, growing their business, or securing their financial future. For corporate clients, we also provide a service at their company's premises, depending on their needs. The task of our employees is to support them in taking financial decisions, inter alia, by analysing their financial needs and goals, financial condition or risk levels of investments.

We integrate sustainability into our business

We are aware that, as a financial institution and a large organisation, we influence many economic processes and individual choices. Guided by our principles and values, we strive to respond to the challenges of the modern world. This is why we integrate sustainability principles into our business and non-business decisions – ESG goals are part of our strategy, This applies to the areas of climate and environment (E), society (S) and corporate governance (G). We support our clients in environmental transformation, entrepreneurship, and financial management. We work towards equal social opportunities and we care for the health of our employees. Our foundation is to operate ethically based on values, principles and processes and in accordance with regulations and with reference to market best practice.

We manage risk

As a public trust institution, we are aware of the importance of stability and an effective risk management system for the banking sector and the entire economy. In our bank, it is structured in accordance with the best market standards, based on the principles of the three lines of defence. The first line consists of business management, the second line includes risk and financial management, and the third line comprises internal audit and compliance. We manage ESG risks as an integral part of each group of risks, both financial (e.g. credit risk or market risk) and non-financial (e.g. operational risk). We also care for optimum management of the asset and liability structure of our balance sheet in line with our risk appetite limits.

Our strategy

We are currently working on a new operating strategy. Its assumptions will take into account both the continuation of the bank's existing lines of business and the need to adapt to changes in the economic and social environment.

At this stage of work, we are focusing on defining the main directions of the new strategy, which will be based on stable, sustainable, and balanced growth, building on the business model developed, reinforced by the bank's strong organisational culture, based on key values such as trust, cooperation, openness, courage and responsibility. The strategy will also take into account the high volatility of the political, economic and social situation at home and abroad, which will require identifying specific measures to reduce exposure which will require identifying specific measures to reduce exposure and minimise the impact of possible changes on the Bank's performance and development.

In Q4 2025, we plan to present an updated strategy, which will set out the strategic objectives (including financial objectives), possible risks of strategy implementation and the bank's opportunities and competitive advantages.

Retail banking

Number of clients

At the end of June 2025, 4.65 million individual clients (155,000 more y/y) were using ING Bank Śląski's services in the retail segment. We had a total of 2.32 million *primary* clients within the retail segment at the end of June 2025, 90.2 thousand more than at the end of June 2024 and 37.1 thousand more than at the end of December 2024. We consider *primary* clients in the retail segment to be clients with a current account with a balance of over PLN 100 (into which salary is paid) and who have another active product.

In H1 2025, our Bank acquired 167.3 thousand new individual clients which resulted in a growth of the number of clients serviced by 87.6 thousand clients versus the end of 2024.

Deposit activity

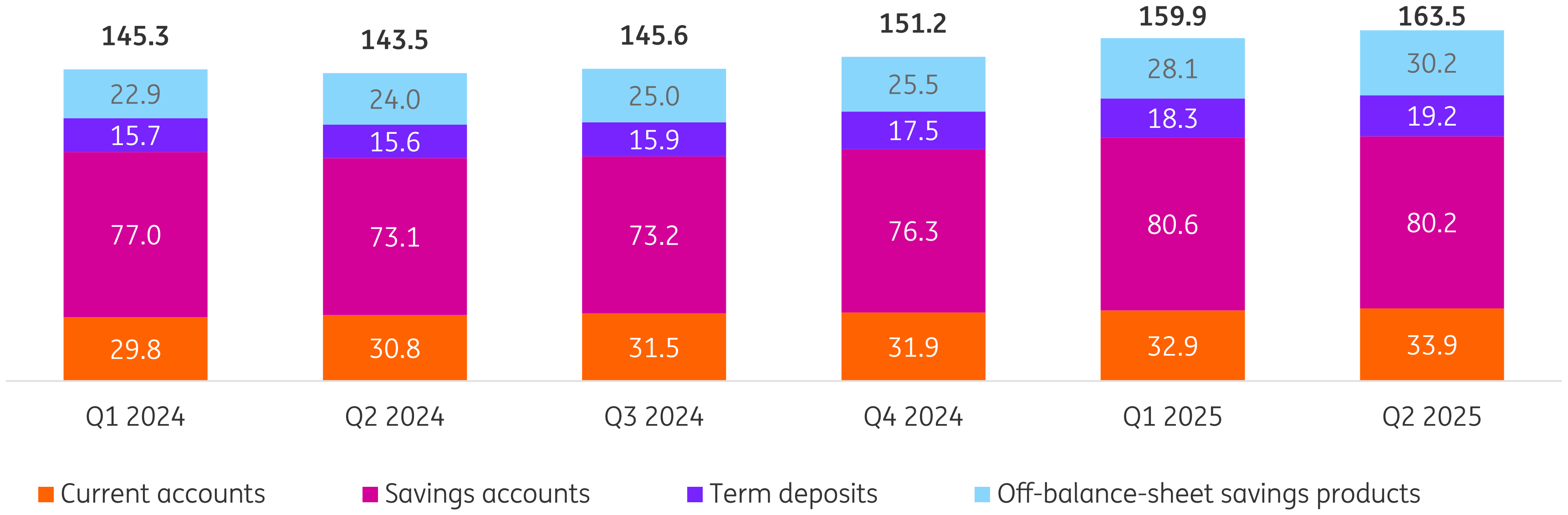
As at 30 June 2025, the total value of funds entrusted by our retail clients amounted to PLN 163.5 billion, an increase of PLN 12.3 billion (+8.2%) during H1 2025 and by PLN 20.0 billion (+13.9%) y/y.

The balance sheet funds of our retail clients amounted to PLN 133.3 billion at the end of June 2025, an increase of PLN 7.6 billion compared to the end of 2024. This was due to the higher value of funds accumulated in savings accounts (an increase of PLN 3.9 billion compared to the end of 2024).

The value of savings in our clients' off-balance-sheet products (financial instruments held in brokerage accounts and investment funds) amounted to PLN 30.2 billion at the end of June 2025, which was PLN 4.7 billion (+18.5%) higher than as at 2024 year-end and PLN 6.2 billion higher y/y (+25.9%). Assets held by TFIs at the end of June 2025 amounted to PLN 20.6 billion (PLN +2.9 billion, +16.4% compared to the end of 2024), of which the assets of funds complying with Articles 8 and 9 of the SFDR amounted to PLN 7.3 billion (+36.0% y/y). Financial assets held in brokerage accounts increased by PLN 1.8 billion (+23.3%) compared to the end of 2024 to a total of PLN 9.7 billion.

The faster growth rate of the bank's deposit base compared to the growth in volumes in the sector translated into an increase in the market share of retail deposits in H1 2025. As at the end of June, it was 10.3%, compared to 10.1% at the end of December 2024.

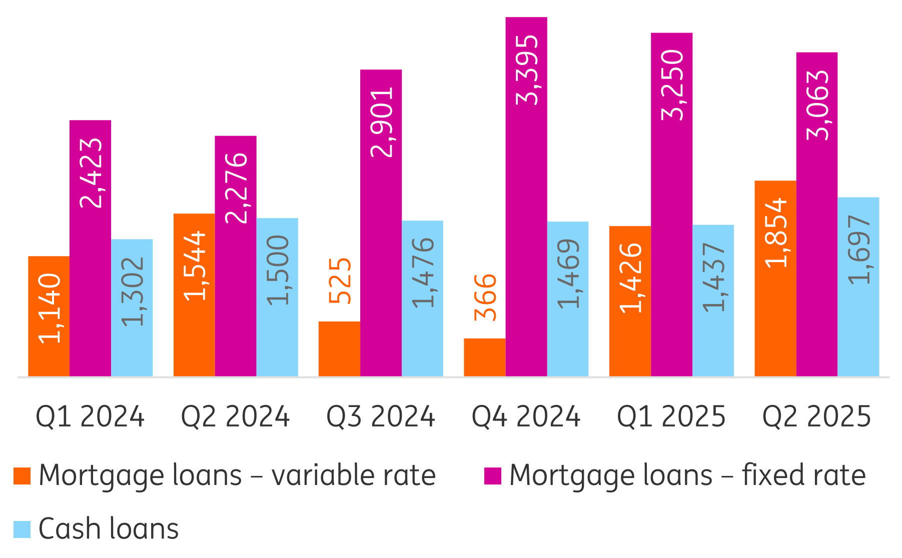
Portfolio of liabilities to clients of the segment by product (PLN billion)



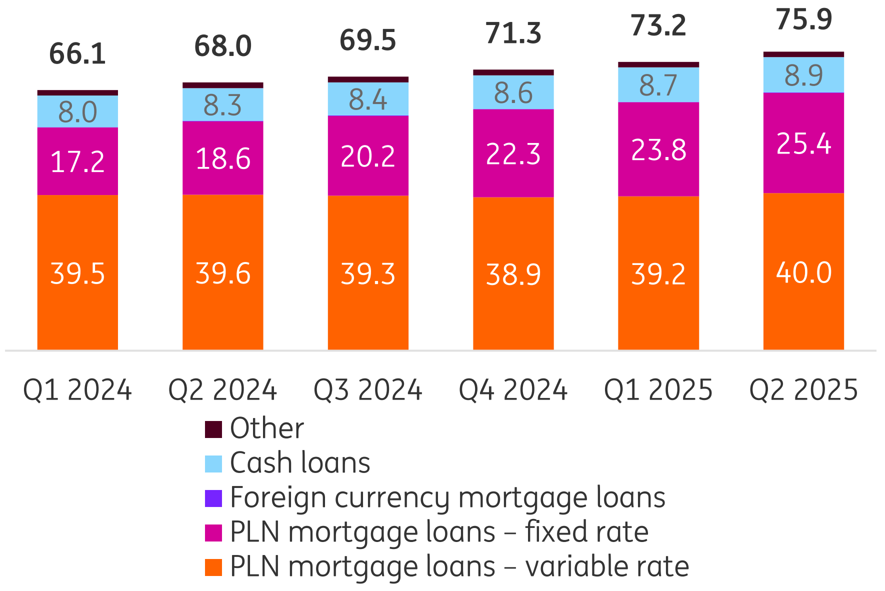
Lending activity

At the end of June 2025, gross retail client loan receivables amounted to PLN 75.9 billion. During H1 2025, the bank's credit exposure to this group of clients increased by PLN 4.6 billion, or +6.4%. The largest increase in volumes was in the area of fixed-rate mortgage loans (+3.1 billion, +14.0% vs. December 2024). As a result, we increased our market share of retail credit receivables to 10.3% (compared to 9.9% in December 2024). After excluding foreign currency mortgage loans from the portfolios, our market share in retail loans would be 11% (June 2025) and 10.7% (as at 2024 year-end), respectively.

Retail loan sales (PLN million)



Gross receivables portfolio from clients of the segment by product (PLN billion)



In H1 2025, the bank sold PLN 9,593.1 million of mortgage loans, an increase of PLN 2,209.3 million, or 29.9%, compared to H1 2024. According to data from the Polish Bank Association, in H1 2025 ING Bank Śląski held the second position in the market with a 21.8% share in sales of housing loans to private individuals.

In the area of cash loans, we granted loans totalling PLN 3,133.9 million in H1 2025, which represents an increase of 11.8% (PLN 331.4 million) compared to H1 2024. 94% of these sales were made through remote channels (90% the year before).

Corporate banking

Number of clients

At the end of June 2025, 584,500 corporate clients used ING Bank Śląski's services within the corporate segment, including:

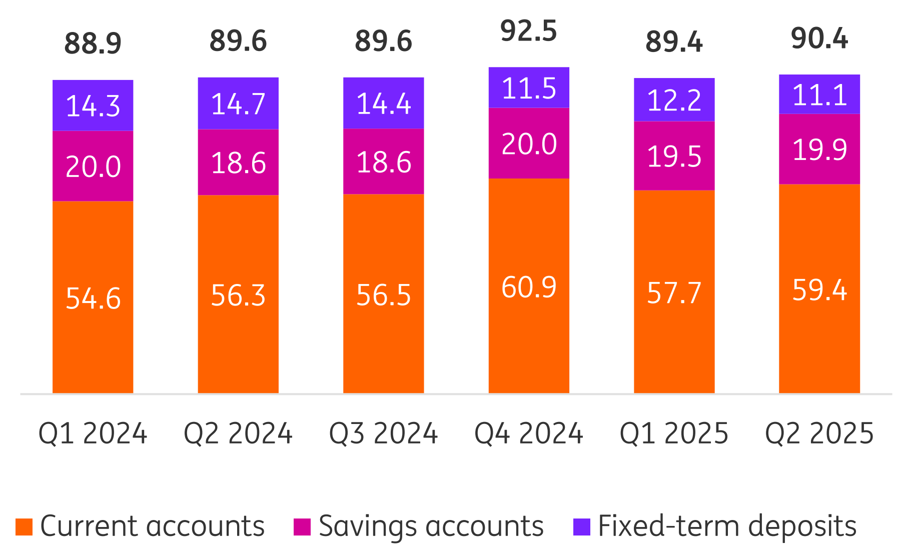
- 3.200 strategic clients,
- 120,800 medium-sized and large enterprises, and
- 460,500 entrepreneurs.

We had a total of 300,400 primary clients within the corporate segment at the end of June 2025, 10,500 more than a year earlier. During H1 2025, the bank acquired 35,800 new corporate clients, contributing to an increase of 12,100 clients served compared to the end of 2024.

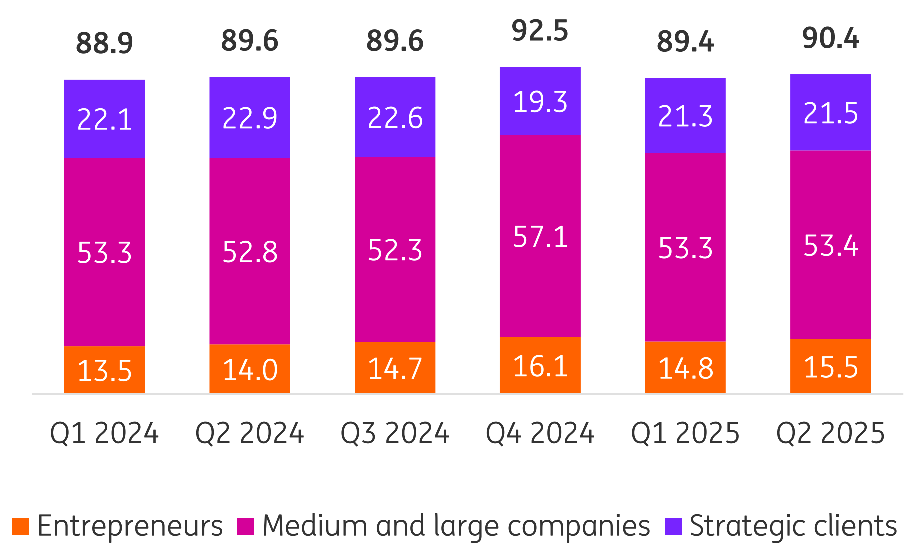
Deposit activity

At the end of June 2025, the total funds deposited by corporate clients with the bank amounted to PLN 90.4 billion, thus the bank held a 10.2% market share in corporate client deposits (10.3% as at 2024 year-end). The decrease in deposit volumes compared to the end of 2024 was due to lower deposit balances of medium-sized and large enterprises (PLN -3.7 billion) and entrepreneurs (PLN -0.6 billion), which was partly offset by an increase in the level of deposits of strategic clients (PLN +2.2 billion).

The portfolio of liabilities to clients in the segment by product (PLN billion)



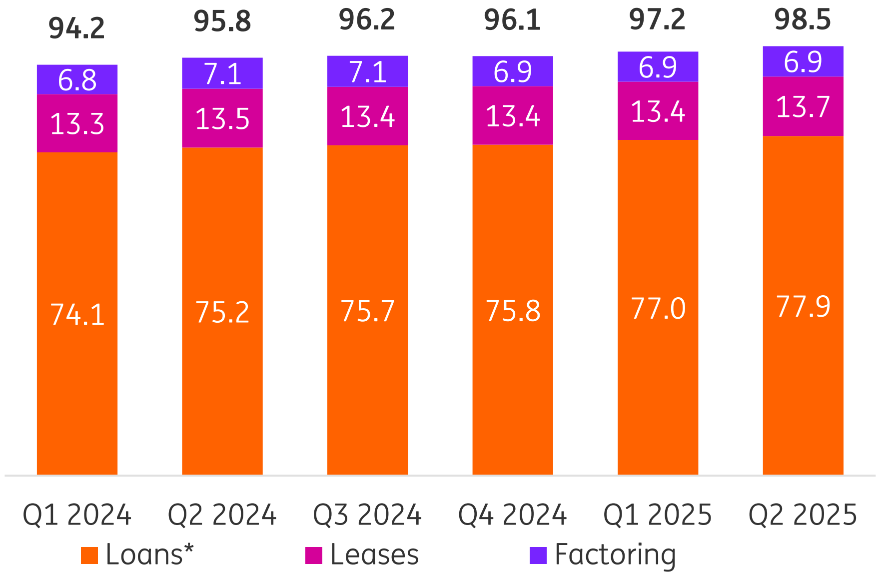
The portfolio of liabilities to clients in the segment by client group (PLN billion)



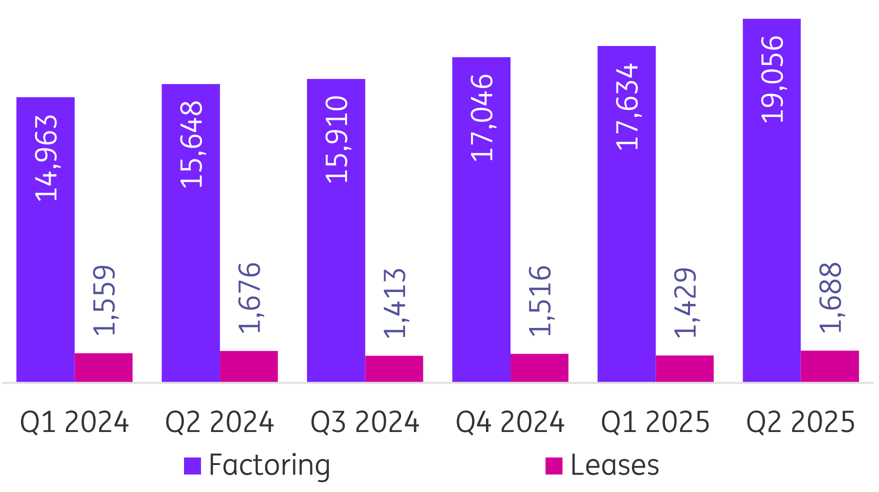
Lending activity

At the end of H1 2025, the gross value of financing provided by our group to corporate clients amounted to PLN 98.5 billion. In H1 2025, this amount increased by PLN 2.3 billion (+2.4%). During this period, our exposure to all corporate clients increased – from entrepreneurs (PLN +119 million) to medium-sized and large enterprises (PLN +2,093 million) to strategic clients (PLN +104 million). The increase in this exposure included bank financing (PLN +2.0 billion), but also in the form of leasing (PLN +0.2 billion) and factoring (PLN +0.1 billion). We estimate that in June 2025, our bank had a 11.9% market share in corporate loans (unchanged from the end of 2024).

Gross receivables portfolio from clients in the segment by product (PLN billion)



Turnover in factoring and leasing sales (PLN million)



** Including loans measured at fair value.*

Sustainable development

Achieving sustainability targets and ESG

At ING, sustainability issues are firmly embedded in the business strategy as one of the key priorities. This is a direct result of our mission and our values. We also see the area of sustainability as a field for building long-term competitive advantages – both ours and those of our clients. Our ambition is to be a partner to our clients, employees, and society in sustainable development.

For the period 2025-2027, we have adopted 7 strategic priorities in the ESG area for implementation. They are the result of extensive internal and external analysis, including, inter alia, an analysis of ESG commitments made to date and market trends. The five strategic priorities focus on two interrelated areas: environmental transition (E) and equal opportunities and entrepreneurship (S). We identified two more as success factors and a strong foundation (G) to achieve the ESG objectives set. With our actions set out in the ESG strategic priorities, we support the implementation of selected UN Sustainable Development Goals.

Information on the implementation of the ESG targets in the 2022-2024 business strategy can be found here. We also write about our commitment to sustainability on a dedicated website.

In the following section of the Report, we describe selected activities implemented in H1 2025.

ESG strategic priorities for 2025-2027

Strategic areas

Environmental transformation

1. We support our clients in their environmental transition by:
- financing and offering sustainable products and services
- building awareness and knowledge
- taking actions on biodiversity

2. We manage our loan portfolio - we strive for net-zero 2050 in line with "Roadmap for reducing GHG emissions ING Bank Śląski Group"

3. We continue our own environmental transition:
- in own operations
- shaping a sustainable supply chain

Equal opportunities and entrepreneurship

4. We strengthen entrepreneurship and level the playing field for clients, which includes:
- supporting clients' financial health
- ensuring security and accessibility
- supporting projects focused on social equality and just transition

5. We create a work environment where we take care of:
- personal development and entrepreneurship
- wellbeing (mental and physical health)
- diversity, equality and inclusion

Success factors

6. We co-create an ecosystem for sustainable development

- **We strengthen the ESG culture in the organization** by building employee knowledge, awareness and engagement
- **We support innovation and initiatives** for the environment and society
- **We intensify activities** in the areas of partnerships, joint sector initiatives, education and dialog

Our foundations

7. We build a stable and resilient bank based on a strong ESG foundation:

- We have embedded ESG and sustainability in our business strategy
- We operate under a permanent ESG governance structure
- We manage ESG risks and identify sectors and areas which are excluded from financing and subject to restrictions
- We adapt to the requirements of ESG regulations
- We effectively manage ESG data and we care about their quality
- Our ESG communication is engaging and transparent

Environmental transition (E)

Society is moving towards a low-carbon economy – our clients are doing it, ING Bank Śląski is also doing it. We fund many sustainable activities, but still more of those that are not. Key areas and measures for 2025-2027 for environmental transition include:

- Providing financing of PLN 5 billion for RES projects between 2024 and 2030 in the corporate segment;
- Every second zloty of a mortgage loan granted between 2025 and 2027 finances properties with an energy demand of up to 76kWh/m2 /year;
- Sales of ESG investment funds (Articles 8 and 9 of the SFDR) between 2025 and 2027 at PLN 1.8 billion, including PLN 600 million in 2025;
- Set priorities for reducing negative impacts on biodiversity in 2025;
- By the end of 2030, 80% of the clients covered by the cross-sector engagement-based transition plan have decarbonisation strategies understood as at least short- and medium-term decarbonisation targets approved by the company's management with identified initiatives to achieve them;
- Reduction in CO_2/m^2 emissions intensity of owned and leased building office space at the end of 2027 by 51% compared to 2019 (market-based), including a 38% reduction at the end of 2025 compared to 2019 (market-based).

1. We support clients in their environmental transition

We focus on aligning our activities and solutions to help clients strengthen their competitive advantages, including in the area of sustainability. We offer products that broadly address the needs arising from the transition process.

In H1 2025, we provided PLN 1.2 billion in financing for RES projects, and a total of PLN 1.7 billion from the beginning of 2024 to 30 June 2025.

Below are examples of transactions completed in H1 2025:

- ING, as part of an international consortium of financial institutions, has signed a loan agreement with the PGE Group. The transaction has been completed with partner Ørsted Group for the development of an offshore wind farm with a capacity of approx. 1.5 GW. The Baltica 2 offshore wind farm is the largest offshore wind power project in terms of generating capacity, the so-called stage 1 project currently being implemented in the Polish part of the Baltic Sea by the PGE Group and Ørsted. For more information follow the link.
- ING supported Polenergia and Equinor in the development of the Baltic 2 and Baltic 3 offshore wind farms by providing EUR 155 million in financing for two key infrastructure projects in Poland – wind farms with a total capacity of 1.4 GW. Full commercial energy production is planned for 2028. For more information follow the link.
- ING Bank Śląski has joined a financing consortium to provide a PLN 3.7 billion loan to Światłowód Inwestycje ("S-I"), of which ING Bank Śląski's share is PLN 300 million. Our bank acted as the interest rate hedge provider for the transaction, while ING Bank N.V. was involved in the transaction as debt advisor and sustainability coordinator. For more information (in Polish) follow the link.
- ING has entered into an agreement for a new international refinancing transaction for a portfolio of logistics properties in Poland and Romania owned by Fortress Real Estate Investments Limited. The EUR 57 million loan was provided by ING Bank Śląski and ING Romania, and all financing will comply with Green Loan Principles by the end of the year. ING Bank Śląski's share is EUR 40 million.

Continuation of financing and sustainability-related product offerings for the retail client segment

Retail clients can take advantage of the "Loan for Better," which can be used for energy-efficient solutions such as property upgrades or renewable energy sources, home energy storage units for own consumption, the purchase of a bicycle, scooter, or electric car. In addition, we offer retail clients a mortgage loan for an energy-efficient home with documented low energy consumption (Energy Efficient Home Loan) and an Energy Efficient Retrofit Mortgage. These are offers to support the fight against climate change by financing energy-efficient solutions.

Carbon footprint calculator for companies

A free carbon footprint calculator for companies is available on Firmove.pl. The calculator provides a calculation of Scope 1 and 2 GHG emissions. The calculator was prepared in cooperation with experts from the Climate Strategies Poland Foundation, which deals with counting the carbon footprint of companies and cities, decarbonisation strategies, climate education and efforts to provide reliable information on climate change. In H1 2025, we organised a pilot training course on carbon footprint calculation for the bank's clients, which was attended by more than 20 companies. The calculator was developed in response to the needs of companies that want to respond to the growing expectations of regulators or consumers in the area of sustainability. Link to the calculator (in Polish): Carbon footprint calculator | Firmove.

Developing the knowledge portal "ESG in your company"

For clients and companies looking for practical information on sustainability, we are running and developing a knowledge portal (in Polish) – ESG in your company. In H1 2025, the portal was supplemented with the following content:

- a dedicated website with information on established partnerships with companies that specialise in, inter alia, developing decarbonisation strategies, improving a company's energy efficiency and obtaining funding for e.g. RES or retrofits;
- educational articles on voluntary reporting standards;
- a publication presenting examples of decarbonisation measures that can generate additional savings for the company.

The range of published content covers both ESG and sustainability basics and corporate climate competitiveness, as well as providing examples of companies and transition solutions. The educational content focuses on selected topics, including: how to count a carbon footprint, how to increase energy efficiency in a company, how to prepare for sustainability reporting, whether electromobility in a company can pay off. Also available is the ESG Academy for companies – a series of 6 webinars for small and medium-sized companies that need practical knowledge on how to implement sustainability measures and practices in their companies.

Impact in the area of biodiversity

As a bank, we have the greatest impact through our financing activities. We can have a negative impact when we provide financing to clients/sectors whose activities negatively impact biodiversity. In terms of risk, we bear the risk of a negative financial impact resulting from providing financing to clients whose business models have a negative impact on biodiversity and/or where the loss of biodiversity materially impacts their business model. For this reason, we take our approach to biodiversity into account when deciding which clients we fund and which we exclude from funding (e.g. our approach to deforestation) or restrict funding, which is reflected in our regulations: ESG Instructions applicable to Business Clients and Wholesale Banking clients respectively. At the same time, we are building knowledge about biodiversity within the organisation and sharing good practice in the market. As part of Sustainability Week, we organised an interactive webinar for employees. The theme of the meeting was: "Biodiversity – what does it have to do with the bank? Facts and myths about the relationship between nature and business." The bank actively participates in the coordination of the UN Global Compact's Climate Positive Programme's Biodiversity Team.

2. We manage the loan portfolio

In the 2024 report, we presented GHG emissions data from more than 93% of the bank's assets. In 2023, we published ING BSK Group's Roadmap for reducing GHG emissions on our own economy and loan portfolio. In 2024, we announced the continuation of the document – we are broadening the activities to include a cross-sector transition plan to support clients to move towards more sustainable business models and a dialogue with companies operating in the most carbon-intensive sectors of the economy and the bank's portfolio. We report on progress on an annual basis.

Our transition plan focuses on how we drive transition in our financial operations, with priority given first to the residential, commercial property, energy generation sectors and a group of clients covered by a cross-sector transition plan based on engagement understood as a dialogue with clients to support their transformation.

The challenge in the area of emissions management is the client segment of large and medium-sized companies, which to date has not been covered by comprehensive measures to support their transformation. Given the lack of publicly available information in the large and medium-sized client segment, we designed a survey in H1 2025 to collect information on the decarbonisation plans of clients who are part of the initiative. The purpose of the survey will be to gather information on decarbonisation priorities and targets and adopted decarbonisation strategies, the emission values of each of Scopes 1, 2 and 3, as well as investment plans to support the achievement of the adopted targets by individual companies.

Round tables for clients in the Business Banking segment

In line with the cross-sector transition plan, the bank has taken a dialogue-based approach assuming that partnering with clients is the key to a successful transition towards sustainability. As a bank, we not only have a duty to finance, but also to actively support our clients in their decarbonisation journey. Our commitment means constantly sharing knowledge, jointly seeking the best solutions, and creating strategies that benefit both our clients and society. The basis for such dialogue are roundtables – a platform for discussion, knowledge exchange and experience sharing among companies that want to build their competitive advantage in the ESG area. Since the beginning of 2025, ING has organised four further meetings with Business Banking companies. The topic of discussion was the challenges of transition and possible directions for increasing the resilience of business models to change and risks. Meetings with the agricultural and transport sectors were held in Szczecin, Łódź, Opole and Katowice. A total of 58 companies have taken part in meetings since the beginning of the year.

Sectoral partnerships and joint sectoral initiatives

Effective implementation of ESG practices requires up-to-date, expert and industry knowledge. We try to systematically seek out best practices and partners in the market to support companies in their transformation. In 2025, we have established new partnerships with companies that specialise in, inter alia, creating decarbonisation strategies, improving the company's energy efficiency and obtaining subsidies for RES or retrofits, for example: KAPE National Energy Conservation Agency, DB Energy, VIVERNO. Since 2025, we have also collaborated with the Terra Nostra Foundation and the logistics company Rohlig Suus on topics relating to the opportunities and challenges of the agricultural and transport sector in Business Banking roundtables.

3. We continue our own environmental transition

We are consistently implementing measures to reduce GHG emissions in terms of our own management.

Examples of the activities we carry out:

- We are aiming for 100% of the energy purchased by the bank and its subsidiaries to come from renewable sources. Since 2016, in order to fulfil this provision, we have been purchasing certificates and guarantees of origin certifying that the electricity comes from renewable sources.
- We are changing existing solutions in our buildings, in H1 2025:
  - we completed the replacement of the main air handling units with heat recovery units in the building on Sokolska Street,
  - we replaced the heating source on the ground floor and 1st floor of the low-rise building on Sokolska Street in Katowice from district heating to electric heat with fan coil units and VRF outdoor units,
  - we have changed the way hot water is heated in the building on Sokolska Street in Katowice from district heating to a heat pump supported by solar collectors,
  - we carried out a new installation using a heat pump in the PvB area of a building on Chorzowska Street in Katowice,
  - we have switched off the heating substation in the office building on Roździeńska 41 Street in Katowice,
  - we changed the heating source from gas to electric with heat recovery at the outlet in Częstochowa, Dekabrystów,
  - we replaced the lifts with energy-efficient lifts (with energy recovery) in the building on Sokolska street in Katowice.
- We are carrying out a succession of external and internal lighting upgrades and replacing existing lighting with LED lighting.
- We conduct numerous education and awareness-raising campaigns among employees. To mark Earth Day, we held an electro-waste collection from 22 April until the end of May. We collected around 130 kg of electro-waste, which we sorted appropriately and sent for disposal.
- We donate office furniture and other office equipment to foundations and schools as in-kind donations, and organise furniture resale campaigns for employees.

Equal opportunities and entrepreneurship (S)

Because of the important role they play in the economy and society, financial institutions can have a material impact on social issues. At ING, we believe that through our actions targeting the entrepreneurial and financial health of our clients and employees, we support a just transition and contribute to strengthening the economy and supporting social development.

Key measures for 2025-2027 on equal opportunities and entrepreneurship include:

- Increasing in the number of clients with a pension product between 2025 and 2027 by 108,000, including 36,000 in 2025.
- Setting priorities in the area of just transition and social impact in 2025.
- Between 2025 and 2027, maintaining the unadjusted Gender Pay Gap rate at 31% – according to the new EBA methodology.

4. We strengthen entrepreneurship and level the playing field for clients

We support the financial health of our clients

We define financial health as a state in which we feel financial peace of mind and have a sense of security. That is why ING has for years been promoting attitudes and habits that help clients:

- understand how to meet their current financial obligations and needs,
- aware of how to deal with potential problems,
- build financial security for themselves and their families in order to achieve their life goals.

The bank supports clients – prompts, reminds, offers personalised solutions so that they can focus on their plans and do the things that are most important to them.

Offering pension products

At ING, we encourage you not only to think about retirement, but above all to act and take care of your future early. For many, it is a complex and off-putting subject. That is why we continue to focus on responsibly offering IKE and IKZE pension products based on long-term saving and investment. At the end of H1 2025, more than 200,000 clients were already putting money aside for retirement at ING Bank Śląski using one of the dedicated products. In 2024, one in four IKE products and one in five IKZE products on the market were opened through ING Bank Śląski.

New savings offers

In May 2025, the Bank launched a dedicated savings offer for Private Banking clients ("OKO Bonus Private Banking").

Supporting young people with Mobi account offer and financial education

ING, in its role as an active assistant, supports the Alpha and Zet generations in building financial resourcefulness that will enable them to better manage their money in the future. For children 6-12 years old, there is an offer of Mobi account with the secure Moje ING app, as well as educational activities in the ING City game in Roblox. In turn, for young people of generation Z, a series was created on Tik Tok called "Na wła$ny rachunek," which combines entertainment with practical financial knowledge in an interesting way. Until the end of July, new Mobi account holders were able to enjoy an attractive benefit – a sports pass for PLN 20 per month.

We share knowledge and build awareness of financial health principles

- The campaign encourages savings with the idea of a "white hour" – that is, what we want to see happen. We are reversing the popular narrative of "saving for a rainy day" (literal translation from Polish: "saving for a black hour"), redefining saving as something positive, enjoyable, and planned. Saving with ING is simple and friendly thanks to its savings account offering, and easy to use in-app.
- We suggest how to better manage household finances. We point out helpful tools in the banking application. In addition, we publish interesting articles on personal finance topics on the Financial Health – knowledge and tips website (in Polish) (ing.pl) . The most popular are: budgeting, saving in difficult times, and borrowing rationally. The choice of content is based on the needs reported in internal and external surveys. The website has an educational role and is not intended to promote our services.
- We support parents in teaching their children financial resourcefulness. In the campaign "Independent children are calm parents," ING, the parent-child assistant promotes the Mobi Account and in-app solutions that will increase children's financial resourcefulness. Financial savvy is the first step towards conscious money management in the future.

Daily support in building financial balance

ING clients in the banking app can use tools that support the planning and control of their daily finances. One of these is the "Financial Month," which enables comprehensive management of one's money – from withdrawals to planned payments, to ongoing analysis of spending with information on the rate of spending and approaching the limit set by the client. The bank is also constantly adding new features that make it even easier to manage finances in different contexts. Our initiatives in H1 2025:

- ING in May 2025 made the new BLIK Recurring Payments available to clients. This is another convenience for clients, allowing them to easily and conveniently manage recurring charges such as subscriptions or subscriptions. It is also a security feature, as you need to enter your BLIK code to activate the recurring payment.
- The bank was the first in Poland to allow accounts and cards from Revolut to be added to Moje ING in January 2025. This gives instant access to balances from these accounts, a shared transaction history and the ability to analyse spending in one place for ING accounts and a total of nine other banks. Clients using more than one bank gain convenience, transparency, and real support in their daily financial management in the Moje ING app.
- ING was the first in the Polish market to implement the new version of Visa Offers 2.0. It makes it even easier for ING's retail clients, from June 2025, to take care of their finances and take advantage of savings opportunities with their everyday purchases. Users with Visa cards issued by ING gain access to attractive cashback offers – without having to activate the promotion in advance. All you have to do is pay with your Visa card (including with your phone or smartwatch) at Programme partners to automatically receive a portion of your spending back in the form of points. The points collected in the wallet can be exchanged by the client for zlotys (1 point = 1 zloty).

ING encourages Poles to be entrepreneurial

ING Bank commissioned a survey asking adult Poles how they rate their resourcefulness and entrepreneurship. Additionally, a team led by Professor Jacek Wasilewski of the University of Warsaw analysed how entrepreneurship was portrayed in pop culture – in films, TV series and music.

The results, published in May, show that despite the lack of positive entrepreneurial role models in pop culture, most Polish women and men think of themselves as entrepreneurial. Of the seven entrepreneurial types, the two most popular were Family Leader and Independent (23% each). For many people, entrepreneurship is not just about running a business – you can also be entrepreneurial in your everyday life.

Based on the results, the researchers prepared a quiz in which everyone can test their entrepreneurship. Almost 10,000 people have already used it, and it is still available (in Polish) https://quiz-ing.webankieta.pl/ .

Professional Artist Programme

Organised by the ING Polish Art Foundation, the Artist-in-Residence programme was the result of conversations with artists from the Foundation's collection. The aim of the programme is to supplement academic knowledge with practical tools – art market skills, studio organisation and finances. The Foundation supports this group in financial health and in being entrepreneurial. For years, she has been inviting top experts, curators, artists, critics, and gallerists to share their knowledge: she organises lectures and individual portfolio consultations for budding artists. This part of the project is organised by the foundation every spring in the form of online meetings. 9. edition of the programme started on 24 March 2025.

Safety and availability of products and services

Implementing digital accessibility standards

We systematically implement solutions in line with international digital accessibility standards. We are adapting the Moje ING mobile app, the Moje ING online banking system and the bank's website (www.ing.pl) to be used by visually impaired people in accordance with Web Content Accessibility Guidelines 2.1 (WCAG 2.1). We are also cooperating with the "Visible Foundation" in this area. In January 2025, we joined the Business Accessibility Forum. Bearing in mind the requirements for accessibility of products and services (European Accessibility Act directive), we aim to ensure that devices (ATMs, cash dispensers) are suitable for use by people with special needs.

We are actively involved in developing a sectoral approach to meeting the requirements of the new regulations introduced by the Act on Ensuring that Businesses Meet the Accessibility Requirements for Certain Products and Services. We are also working on additional guidelines and guidance for venue specialists in dealing with clients with special needs.

In the area of digital accessibility, we are guided by recommendations provided by external experts from the Visible Foundation, who audit our website for digital accessibility. By working with specialists, our team develops its competences and acquires knowledge of accessibility standards. The number of employees certified by the Plain Polish Language Lab at the University of Wrocław is also growing year by year. We want to introduce and consolidate plain language standards, educate staff, and develop their ability to speak and write intelligibly.

We adapt our regulations and any documents for clients in such a way that they are even more understandable, we write in simple language. On request, we will prepare regulations in Polish Sign Language, in a version to be listened to (audio), enlarged, with large font, written in Braille.

With concerted efforts to improve digital accessibility on the ing.pl website, the online banking system and the Moje ING mobile app:

- we take care of the logical structure of the content and comprehensible language – we use headings in the right hierarchy, label the lists, provide clear contrast of elements, include alternative descriptions for graphics where necessary, work on completing the video transcription,
- we improve and enrich the source code of the website with elements that allow the content to be understood by people using screen readers,
- we allow the content of the website to be enlarged in the web browser, the view adapts to the width of the device screen, the user can navigate the website with the keyboard and use screen readers,
- we are improving the forms to make them simple and clear for everyone,
- we publish documents and regulations in formats that can be read by software supporting people with special needs, and we use clear titles and descriptions to make them easy to find and recognise.

We are increasing the number of devices with the ING logo equipped with audio systems – a voice guide function that supports visually impaired people in completing transactions. We also ensure that ATMs/withdrawal machines with the ING logo are comprehensively labelled with stickers with messages in Braille. Where possible, we also adapt the height of the equipment to accommodate wheelchair users. On our “Bank without barriers” website dedicated to clients with special needs, we have listed the facilities available at our branches. In the bank outlet finder, each bank outlet is labelled with the outlets available and, thanks to predefined filters, clients can select the facility that best suits their needs.

We are helping clients in the fight against cybercrime, this time we are specifically addressing companies

A study commissioned by ING shows that more than half of Polish entrepreneurs have fallen victim to cybercriminals. 56% of respondents have encountered phishing – they have received messages with infected attachments or links to fake sites. 44% received a false invoice and the same number received a proposal for a non-existent investment. It is worrying that as many as 40% of respondents have never heard of an institution such as CERT Polska, and between 41 and 57% of companies do not take any action after encountering a fraud attempt.

ING has been supporting clients to take care of their online safety for years. In the campaign “Entrepreneur, don’t give cybercriminals a second chance,” it encourages companies to report fraud attempts to CERT Polska – a way to improve company security and promote a proactive attitude towards cybercrime.

In addition, for the purposes of the campaign, in cooperation with Piotr Konieczny, an expert on internet safety, ING prepared the “10 rules for a safe company online”. More about the campaign (in Polish): https://www.ing.pl/lp/cert.

Teaching children about online safety in the educational game Roblox

4. The ING City’s season at Roblox was a new opening. We have been regularly teaching children the principles of cyber-safety for the past 3 seasons and have now encouraged them to share their knowledge with others. We used the “Battle of the Rhymes” formula, which is well-known among young people. Cyber-safety rules in the form of simple, likeable, and rhyming tips were passed on in and out of the game, spreading the idea of safety to their friends.

In the ING City, more than 220,000 new players were added in Season 4 alone.

The ING City, the first Polish commercial game on Roblox has already exceeded 3.7 million visits. The principles of financial education and security through play have so far been taught to more than 1.2 million players.

Equalising social opportunities and a just transition

We see a just transition as a process of moving from a high-carbon economy to a low-carbon model that takes into account social and economic circumstances, fairly distributing the benefits of the transition while supporting those who will be negatively affected. Today, commitments to phase out carbon-based financing and established sectoral milestones linked to decarbonisation pathways are seen as key practices in the implemented transition strategies of financial institutions. ING has additionally initiated activities to map out areas of social impact by the end of 2025 and define priorities in the area of just transition for the following years.

5. We create the working environment

Developing and being entrepreneurial

At ING, we help you take responsibility for your own development, encourage self-directed learning and create an environment that enables the most effective learning and development based on digital platforms and practical application of skills in everyday work.

We have included information on working environment initiatives in the section Our Resources/Human Resources Management.

Success factors and our foundations (G)

6. We are co-creating an ecosystem for sustainable development

We act on the defined success factors within the strategic priorities in the ESG area. We want to co-create an ecosystem for sustainability – inside and outside the organisation – by building knowledge and awareness among employees, supporting innovation and initiatives for the environment and society, and intensifying activities in the area of partnerships, joint sector initiatives, education, and dialogue. Key measures in this regard:

- 100% of leaders and 80% of employees of ING Bank Śląski Group have ESG targets in their 2027 tasks (including 100% of leaders and 60% of employees in 2025 and 100% of leaders and 70% of employees in 2026).
- We will allocate PLN 2 million per year to the ING Grant Programme between 2025 and 2027.
- Volunteer activities within the main programmes of the ING for Children Foundation – ING volunteers will reach min. 10,000 children in 2025.

ESG goals in everyday tasks

An important element in strengthening the organisational culture of sustainability is the inclusion of ESG goals in individual employee assignments. In 2025, 100% of leaders and 94% of employees (with a target of 100% of leaders and 60% of employees) have a defined ESG and sustainability objective in their roles.

Development offer in the area of ESG

We have implemented and systematically developed a comprehensive ESG education programme to equip employees with the knowledge and skills necessary to build their commitment to sustainability.

The development offer takes into account the different needs and knowledge levels of employees – from basic knowledge (Fundamentals) to specialist issues (Professionals), to individual development paths for ESG experts. We provide a comprehensive 4-module training course on “ESG and sustainability” for all employees. The “Climate Mosaic” workshop in the form of an interactive workshop has become a permanent feature. Their aim is to understand the cause-and-effect relationships and the impact of climate change on both ecosystems and human life. A training offer of the ING Climate School course has also been made available to all employees in Polish in H1 2025.

ESG-focused communities

Our ambition is to differentiate ourselves in the market with knowledge and actions to support clients in their sustainable transition. That is why Wholesale Banking has an ESG Centre, through which we comprehensively support clients and area employees in activities related to ESG topics. In addition, a group of ESG Ambassadors in the Regions is actively involved in Business Banking. Its aim is to create competitive advantages and business opportunities based on ESG. Also in the retail area, we have a community of ESG Promoters, where employees learn, inter alia, how to talk to clients about energy efficiency.

Special events

In March 2025, we organised another edition of Sustainability Week – a week of sustainability within the bank and across the ING Group. 5 days, 11 events and over 22 hours of discussions, debates, workshops, and talks on ESG and sustainability! The theme of this year’s edition was: “Get inspired to take action.” We wanted to provide employees with concrete knowledge, best practices, and inspiration that they can use in their daily work and when supporting our clients in their transformation. Therefore, together with our experts and special guests, we shared data, the latest research, knowledge, and good practices in the field of ESG and sustainability. All of this translated into record attendance, with more than 1,600 employees signing up for events and up to 500 people attending 11 events at any one time.

ING Grant Programme for start-ups and young researchers

ING has announced the winners of the seventh edition of its Grant Programme aimed at start-ups and young researchers. In this edition, the bank has allocated PLN 1 million for innovative solutions to support sustainable urban development (UN Sustainable Development Goal 11).

Results of the seventh edition:

1. The top prize of PLN 400,000 went to Myco Renew for its technology for decomposing textile waste using fungi.
2. In second place was the solution submitted by SkyRes – unmanned aerial vehicles delivering an AED defibrillator to the injured – and its authors received PLN 300,000.
3. In third place was the idea presented by DRIP VISUAL – the PublicTwin platform for public participation in urban planning processes – and its creators received PLN 150,000.
4. In addition, the chapter awarded an accolade worth PLN 100,000 to RIFFSEC for a digital shield against cyber threats with alerts on data leaks, phishing, and other IT threats.
5. A special Audience Award of PLN 50,000 went to MUVA DESIGN, creators of the Svala leaf-shaped system for collecting rainwater on balconies.

The selection of the best solutions was made by a jury of representatives from ING Bank Śląski, business, investors, and NGOs. 7th edition of the competition was decided at the grand final held on 26 June 2025.

To date, the bank has already provided PLN 7 million for innovation. Each edition of the Grant Programme is dedicated to a selected UN Sustainable Development Goal. Link to the ING Grant Programme.

ING for Children Foundation programmes and employee volunteering

The mission of the ING for Children Foundation is to help children be one step ahead. Its implementation takes place through a number of community programmes, both in-house and in partnership with organisations across the country. The foundation is supported in its activities by ING volunteers.

Initiatives launched in H1 2025:

- ABC of Economics – In 2025, the ING for Children Foundation continues its collaboration with the Czepczyński Family Foundation. Together, it invites ING volunteers to participate in a financial and economic education project for the youngest. The project's purpose is to introduce children to the world of finance and develop sound financial habits. The programme is run on the basis of the publication entitled "The ABC of Economics or the First Steps in the World of Finance" dedicated to pre-schoolers and pupils in grades 1-3. This year, 62 packages were distributed to ING branches and volunteers. Classes were held in May and June in kindergartens and schools. They will continue after the summer holidays.
- Economics at Your Fingertips - The ING for Children Foundation prepared educational materials for grades 1-3 and 4-8. Employees of the CFO Division of ING Bank Śląski were involved in the creation of the second part. In addition, a webinar was held for staff with a methodologist and author of educational materials.
- ING's Orange Power – This is a programme that supports the sporting activities of children with disabilities, thanks to the funds run and marched by ING employees in the "Run Warsaw" mass run and the accompanying event I am marching – I am cheering. This year, the foundation allocated the funds raised to support as many as 15 organisations. Thanks to this cooperation, children all over the country take part in competitions, runs and subject contests, as well as regular sports activities during the school year. The first events realised in 2025 took place in the Będkowska Valley, Siedlce, Gorzów Wlkp., Szczecin, Gliwice, Tychy, Sosnowiec, and Wrocław. A list of all grantees is available at the link.

Good Idea Fund and My Environment

The Good Idea fund has managed to implement eight projects to the tune of PLN 44,700 by mid-year. In the new edition of My Environment, 35 projects were funded to the tune of PLN 293,000. Around 300 ING volunteers will take part.

The "Zwolnieni z Teorii" (Free from Theory) competition

In May, ING Bank Śląski, together with the ING for Children Foundation, completed the 2024/2025 edition of the ING Step Up challenge as part of the "Zwolnieni z Teorii" (Free from Theory) social project competition. The programme helps young people to implement their own projects for the benefit of their local communities and develops the competences of the future. In this year's edition, 9,306 male and female students from across the country – in response to current societal challenges – created 1,873 initiatives. As many as 86 teams completed their projects in the ING challenge. They were supported by 82 ING mentors.

7. We are building a stable and resilient bank based on strong foundations

The implementation of our strategy would not be possible without building a solid ESG foundation.

Permanent ESG governance structures

Sustainability management in the ING Bank Śląski Group involves both the Bank Management Board, Supervisory Board, and senior management. At the Supervisory Board level, there is a Sustainability Panel, which has a consultative and advisory role in supervisory activities. The bank operates:

- Committees: ESG Council and the ESG Risk Committee, which have decision-making functions for all business units of the bank and advisory functions to the Management Board for matters requiring its approval
- ESG Innovation Expert Centre
- ESG Risk Management Department
- Investor Relations, ESG Reporting and Market Research Bureau
- ESG programme
- ESG Data Model Project

The responsibilities of the listed ESG risk management structures can be found in our 2024 Report.

The documents and key internal policies governing the ESG area in our organisation can be found here.

We manage ESG risks

We define ESG risk as the risk of negative financial impact on the bank from ESG factors – the risk of their direct or indirect impact. We manage ESG risk by integrating mechanisms for its identification, measurement, assessment, mitigation, monitoring, reporting into our standard processes for managing credit, market, operational, liquidity and funding and non-financial risks. The bank has adapted its organisational structure to manage it as well as possible and to ensure that it is effectively supervised and that the intensity of the work involved in implementing mechanisms for managing this risk is taken care of.

We write about the activities implemented for ESG risk management in H1 2025 here.

Engaging and transparent ESG communication

Actively working with the ecosystem for sustainable development

We share knowledge and our best practices in the ESG area on an ongoing basis through publications and events (e.g. webinars, lectures) within social partnerships (e.g. UN Global Compact Network Poland, UNEP/GRID – Warsaw, the Responsible Business Forum, the Polish Chamber of Commerce or universities – e.g. the Warsaw School of Economics). Our representatives share their experience and good practices at numerous events and conferences (European Economic Congress in Katowice – 23.04-25.04, European Financial Congress in Sopot – 2.06-04.06). We also actively participate in working groups developing market standards – together with the Sustainable Investment Forum Poland (POLSIF), ING experts developed a common sector-wide survey on ESG risks in H1 2025, which will allow banks to comply with EBA requirements.

Sustainable business models at the ESG Leadership Academy

In February 2025, ING held workshops for participants of the Academy organised by the Lesław A. Paga Foundation. Bank representatives shared their practical approach to combining innovation and ESG, and talked about the role of innovation in implementing sustainability aspects in business. The teams used the Sustainable Business Model tool to talk about values, clients, business potential and the environmental and social impact of the solutions.

Report: Drivers of Polish economic growth. Business concerns and demands.

The joint report by ING Bank Śląski and PTWP Group, organiser of the European Economic Congress, is based on in-depth interviews with 25 managers, business leaders in Poland and the heads of 3 foreign chambers of commerce (German, Scandinavian, and Italian) – combined with macroeconomic and sectoral analysis by ING economists. The results indicate that Polish companies see the need to change towards a new model, based on higher value-added sectors and innovation and Polish business, despite global turbulence, is optimistic about the challenges of the future. The report was published on 24 April 2025 and is available (in Polish) here.

Our consolidated financial results

Key financial data

Abridged information on the financial performance of the ING Bank Śląski S.A. Group

PLN million	H1 2024	H2 2024	H1 2025	Change H1 2025 to H1 2024
Income*	5,462	5,817	5,839	6.9%
Cost	-2,067	-1,891	-2,257	9.2%
Risk cost	-515	-521	-402	-21.9%
Gross profit	2,514	3,031	2,786	10.8%
Net profit**	1,958	2,411	2,149	9.8%
Balance sheet total	249,278	260,359	281,980	13.1%
Liabilities to clients	213,541	219,996	241,938	13.3%
Loans granted and other receivables, net	161,411	166,698	173,332	7.4%
Equity**	14,173	17,170	17,616	24.3%

** Including the net profit of associates accounted for using the equity method; ** attributable to shareholders of the parent company.*

Key effectiveness ratios

Key effectiveness ratios of the Capital Group of ING Bank Śląski S.A.

	H1 2024	H2 2024	H1 2025	Amendment H1 2025 to H1 2024
Cost/income ratio* (C/I)	44.5%	38.9%	45.4%	0.9 p.p.
Return on assets (ROA)	1.82%	1.73%	1.73%	-0.1 p.p.
Return on equity (ROE)	28.7%	26.7%	27.1%	-1.6 p.p.
Return on equity (ROE) – adjusted**	21.1%	20.4%	21.4%	0.4 p.p.
Interest margin ratio (cumulative, adjusted***)	3.65%	3.57%	3.43%	-0.2 p.p.
LTD ratio	75.6%	75.8%	71.6%	-3.9 p.p.
LCR	197%	279%	243%	46.0 p.p.
NSFR	172%	178%	180%	8.0 p.p.
LR according to transitional definition	6.36%	6.60%	5.85%	-0.5 p.p.
MREL by TREA (standalone)	23.14%	24.15%	25.55%	2.4 p.p.
Total Capital Ratio (TCR)	15.42%	15.67%	15.66%	0.2 p.p.
Tier 1 capital ratio	14.20%	14.58%	14.69%	0.5 p.p.

** Costs including bank tax; **The sum of net profit for 4 consecutive quarters / average value of capital for 5 consecutive quarters net of revaluation reserve of instruments hedging cash flows; ***margin adjusted for the impact of credit moratoria.*

Income statement

Basic consolidated income statement figures of the ING Bank Śląski S.A. Group for H1 2025 and changes compared to the previous year are presented in the table below.

Basic figures of the consolidated profit and loss account in analytical terms

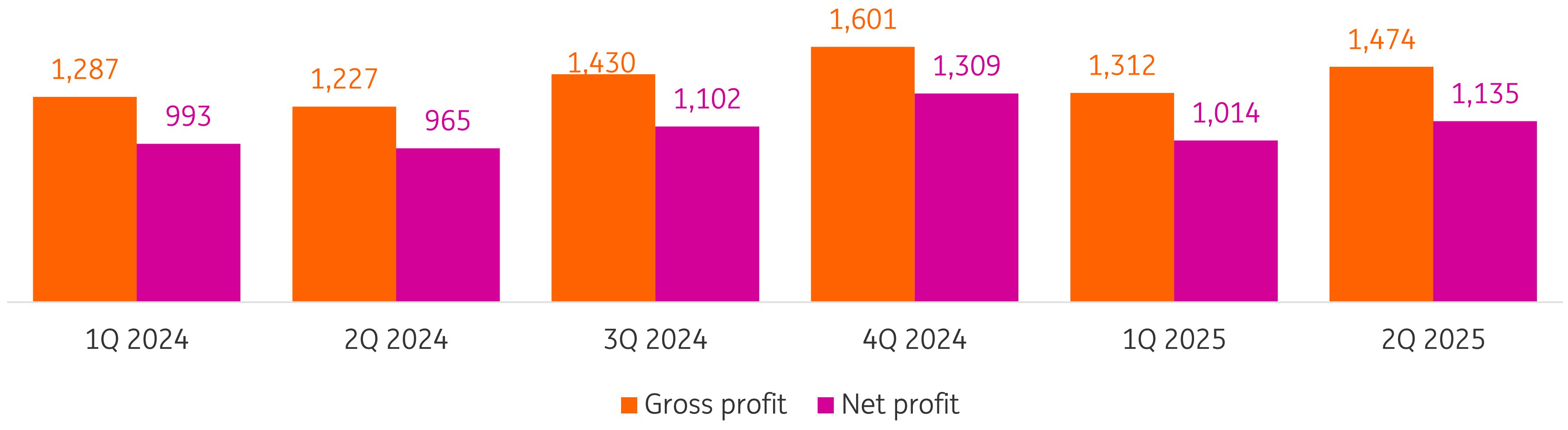
	H1 2024	H2 2024	H1 2025	Amendment H1 2025 to H1 2024	
PLN million				PLN million	%
Net interest income	4,204	4,521	4,384	180	4.3%
Net fee and commission income	1,147	1,147	1,163	16	1.4%
Other income*	111	149	292	181	163.1%
Total income	**5,462**	**5,817**	**5,839**	**377**	**6.9%**
Operating expenses	**-2,067**	**-1,891**	**-2,257**	**-190**	**9.2%**
Allowances for expected credit losses and legal risk costs of FX mortgage loans	-515	-521	-402	113	-21.9%
Bank tax	-366	-374	-394	-28	7.7%
Gross financial result	**2,514**	**3,031**	**2,786**	**272**	**10.8%**
Income tax	-556	-620	-637	-81	14.6%
Net result attributable to non-controlling shareholders	0	0	0	0	-
Net financial result	**1,958**	**2,411**	**2,149**	**191**	**9.8%**

** The result on financial instruments measured through income statement and net foreign exchange result, the result on sales of securities measured at amortised cost, the result on sales of securities measured at fair value through other comprehensive income and dividend income, the result on investments, the result on hedge accounting, the result on other core activities and net profit of associates consolidated using the equity method.*

Gross and net profit

In H1 2025, the ING Bank Śląski S.A. Group posted the net profit attributable to the shareholders of the parent company of PLN 2,149 million. This means that the net result was 9.8% higher compared to H1 2024. The gross result amounted to PLN 2,786 million (+10.8% y/y).

Gross and net profit of the ING Bank Śląski S.A. Group (PLN million)



The increase in the profit before tax for H1 2025 by PLN 272 million compared to H1 2024 was mainly driven by:

- an increase in interest income of PLN 180 million (+4.3% y/y),
- an increase in other income of PLN 181 million (+163.1% y/y),
- a decrease in the cost of risk by PLN 113 million (-21.9% y/y).

The gross result was negatively impacted by an increase in operating expenses by PLN 190 million (+9.2% y/y) and bank tax by PLN 28 million (+7.7% y/y).

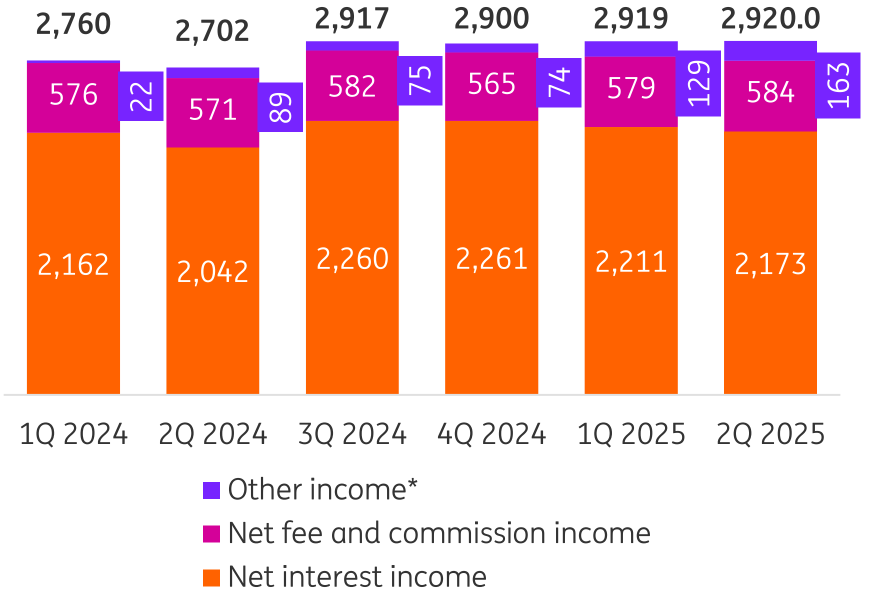
In addition, net interest income for Q2 2024 was subject to a one-off adjustment in respect of instalment suspensions (“credit moratoria”), estimated in accordance with the requirements of IFRS 9 and based on the assumptions used, which reduced the Group’s interest income by PLN 171 million.

Change drivers for gross result of the ING Bank Śląski S.A. Group in H1 2025 (PLN million)

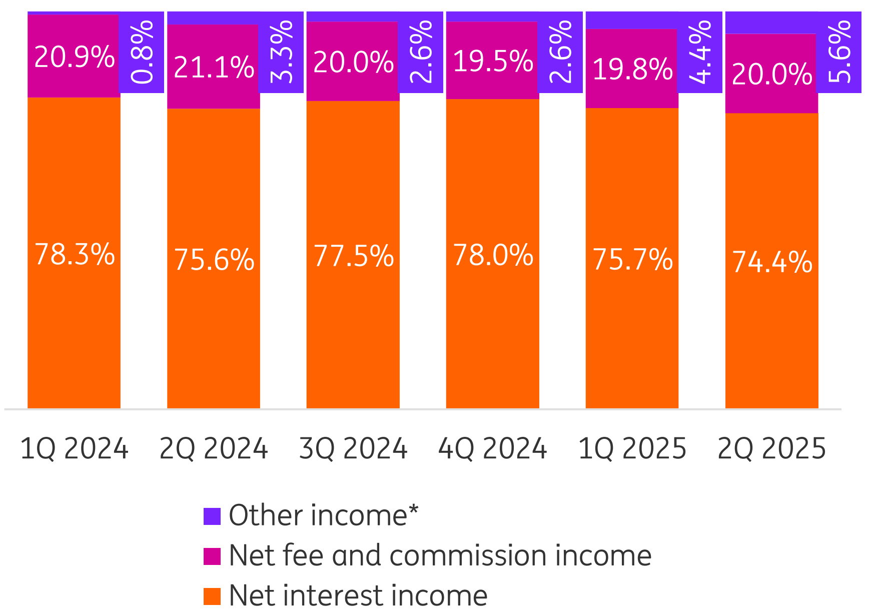
Change y/y	+4.3%	+1.4%	+163.1%	+5.8%	+19.8%	-21.9%	+10.8%

** Including costs of legal risk of FX mortgage loans.*

Income* by income statement categories (PLN million)



Income structure*



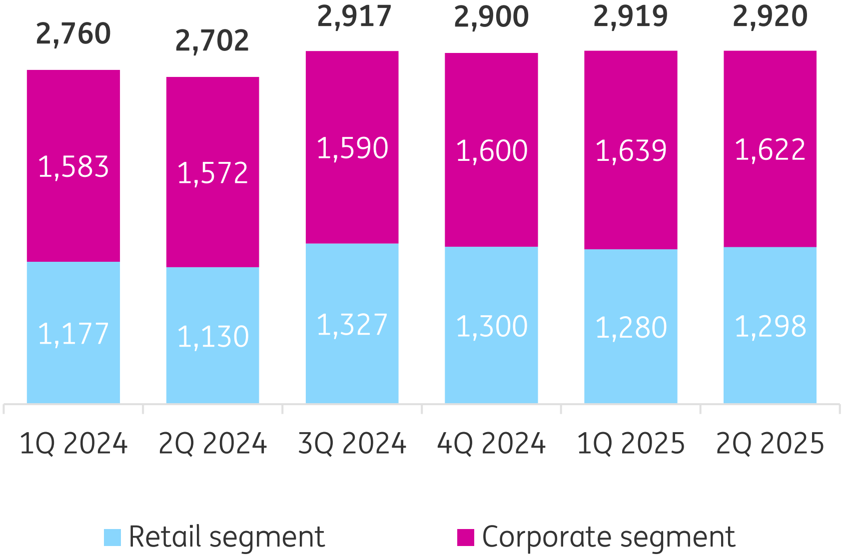
** Including the share in net profits of associates accounted for using the equity method.*

Income

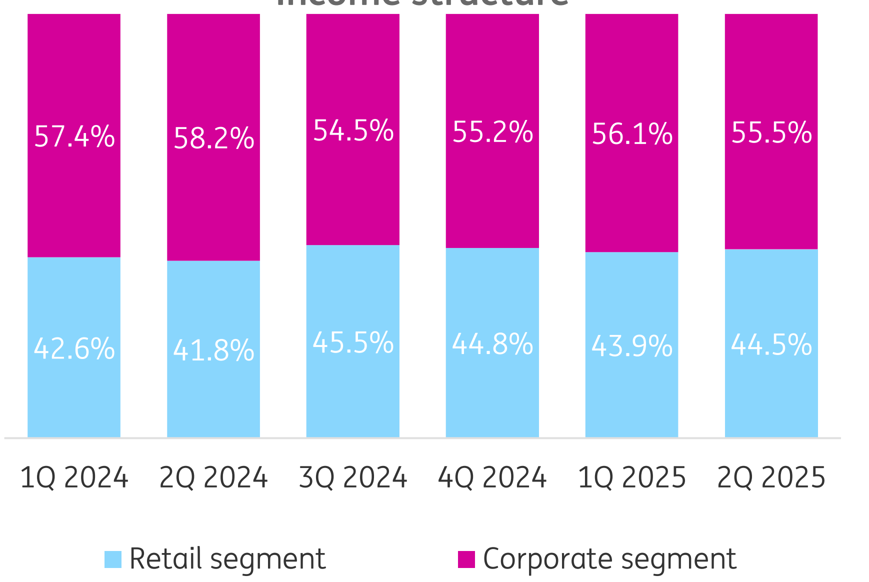
In H1 2025, total income of the ING Bank Śląski S.A. Group amounted to PLN 5,839 million. This means that the improvement compared to H1 2024 amounted to PLN 377 million or 6.9% and was mainly due to higher net interest income and other income.

In H1 2025, the retail segment was the main income growth contributor. Its income increased by PLN 271 million, or 11.7% y/y, to PLN 2,578 million. Consequently its share in the structure was up by 1.9 p.p. to the level of 44.2%. Corporate segment income increased by PLN 106 million, or 3.4%, to PLN 3,261 million.

Income* by segments (PLN million)



Income structure*



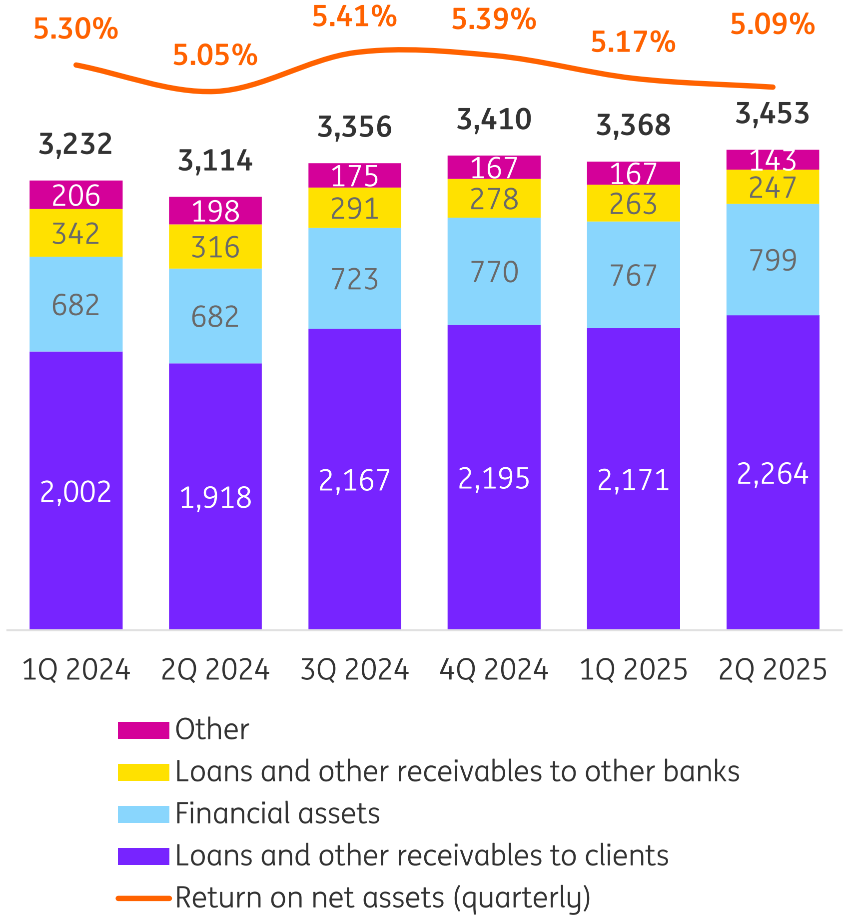
** Including the share in net profits of associates accounted for using the equity method.*

Net interest income

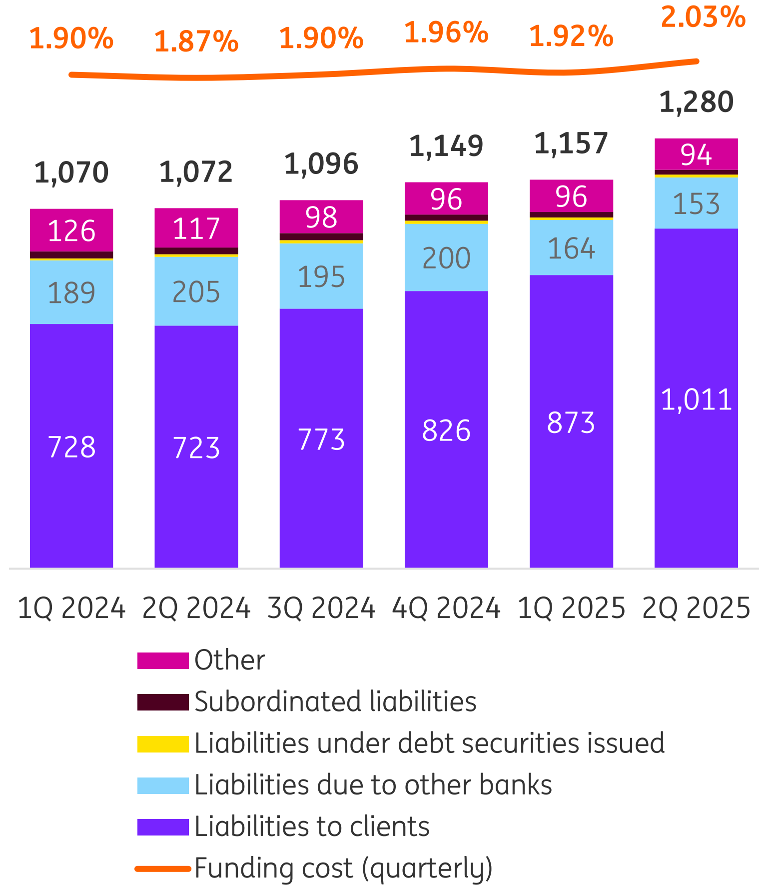
Interest income in H1 2025 was impacted by still high, albeit falling, market rates – throughout 2024, the NBP reference rate was 5.75%, while in May 2025 it was reduced by 50 bps to 5.25% (and by a further 25 bps in July).

In H1 2025, the bank's interest income increased by 7.5% compared to H1 2024, mainly due to higher interest on loans and other receivables granted to clients. On the other hand, interest expenses were up by 13.8% y/y, mainly due to higher costs of liabilities to clients. Consequently, the net interest income was up by 4.3% y/y, i.e. by PLN 180 million to the level of PLN 4,384 million. After adjusting the result for H1 2024 for the effect of credit holidays (PLN +171 million), the increase in interest income in H1 2025 vs H1 2024 would be +0.2%.

Interest income (PLN million)

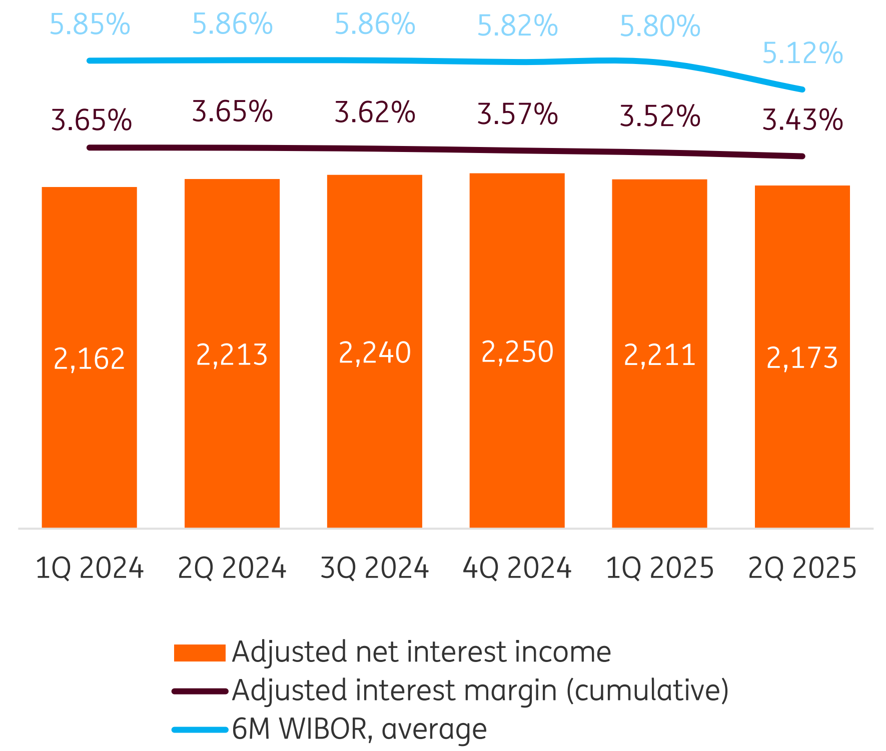


Interest expenses (PLN million)

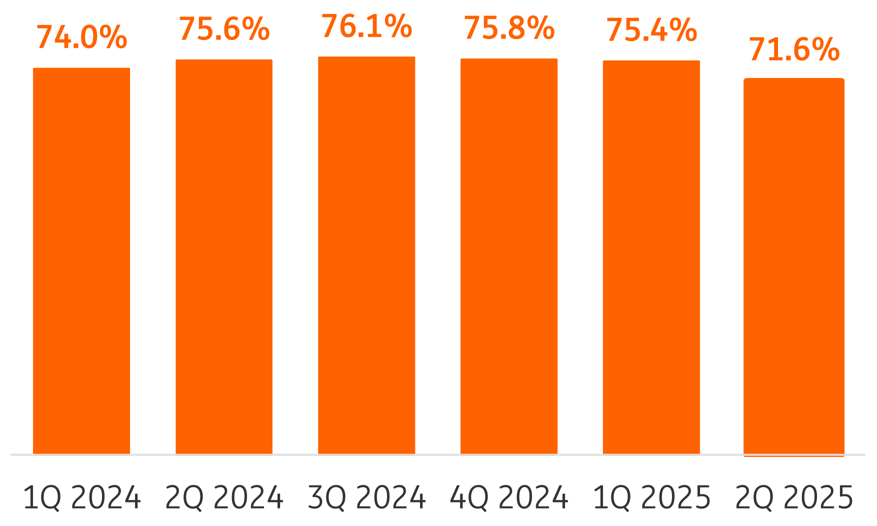


In H1 2025, the bank's cumulative reported interest margin was 3.44% vs. 3.57% at the end of H1 2024, representing a margin decrease of 13 bps y/y. On the other hand, after adjusting interest income for the impact of credit holidays costs, Q2, Q3 and Q4 2024, totalling PLN 140 million, the margin decline was 22 bps y/y.

Adjusted* net interest income (PLN million) and adjusted* interest margin against average 6M WIBOR



LTD ratio



** After adjustment for the impact of credit holidays for mortgage loans.*

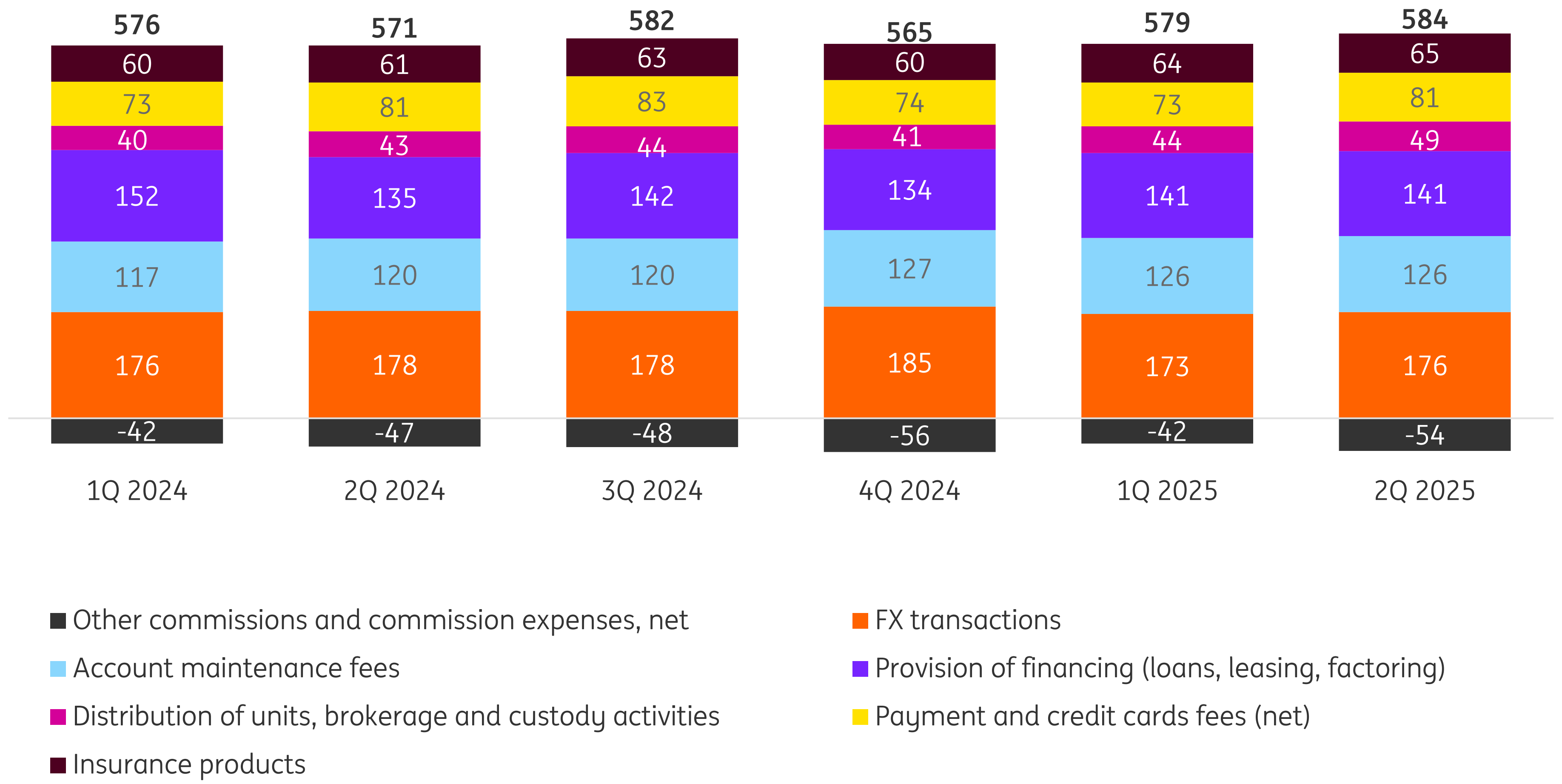
Net fee and commission income

In H1 2025, net fee and commission income of the ING Bank Śląski S.A. Group was up by PLN 16 million or by 1.4% compared to H1 2024 to PLN 1,163 million.

The most significant increase in fee and commission income was recorded for the following items:

- fees and commissions for client accounts – by PLN 15 million (+6.3% y/y),
- fees and commissions for unit distribution, brokerage and custody activities – by PLN 10 million (+12.0% y/y),
- fees and commissions for insurance products – by PLN 8 million (+6.6% y/y).

Net fee and commission income (PLN million)



Other income

In H1 2025, the Group's other income (including the share in the net result of associated entities accounted for under the equity method) amounted to PLN 292 million and was up by PLN 181 million versus the first half of the previous year. A higher result on financial instruments measured at fair value through profit or loss and the result on foreign exchange positions were mainly responsible for this increase. Income from this category was higher in H1 2025 by PLN 193 million y/y.

Operating expenses (including bank tax)

In H1 2025, the ING Bank Śląski S.A. Group's operating expenses (including bank tax) increased by 9.0% y/y up to PLN 2,651 million.

Our own costs (excluding regulatory costs and bank tax) increased by PLN 110 million (+5.8% y/y) in H1 2025. This is due, among other things, to increases in wage costs (+5.7% y/y), costs of operation and general management (+7.5% y/y; here we see high dynamics in, among other things, IT costs +23.3% y/y) and marketing and promotion costs (+ 12.8% y/y). Depreciation and amortisation costs were 3.8% lower y/y.

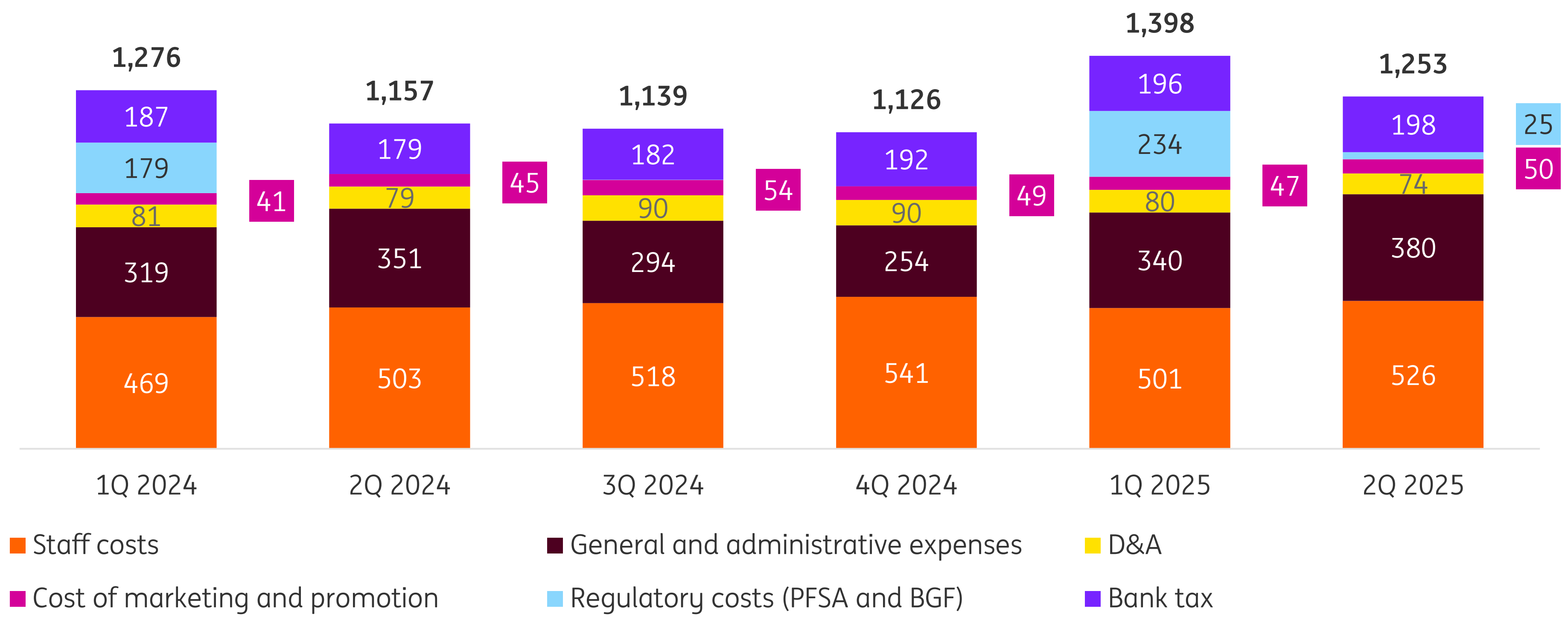
Regulatory costs, including the bank tax, were PLN 108 million higher in H1 2025 vs. the same period last year:

- the contribution to the banks' forced restructuring fund increased by PLN 23 million y/y to PLN 174 million in H1 2025,
- the contribution to the guarantee fund amounted to PLN 50 million in the first half of 2025, with no analogous fee in the previous year (the contribution to the guarantee fund in 2024 was not charged – pursuant to Article 294(1) of the BGF Act, the Council of the Bank Guarantee Fund decided not to charge a contribution to the guarantee fund of banks in 2023 and 2024),
- fees to the PFSA increased to PLN 35 million against PLN 28 million a year earlier (+25.0% y/y).

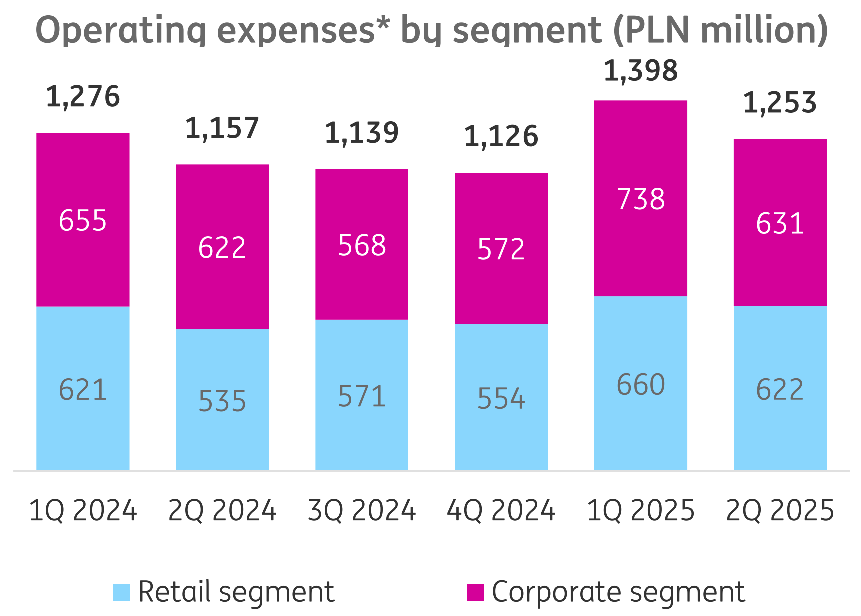
In H1 2025, the ING Bank Śląski S.A. Group paid tax on certain financial institutions (the so-called bank tax) in the amount of PLN 394 million (+7.7% versus the previous year).

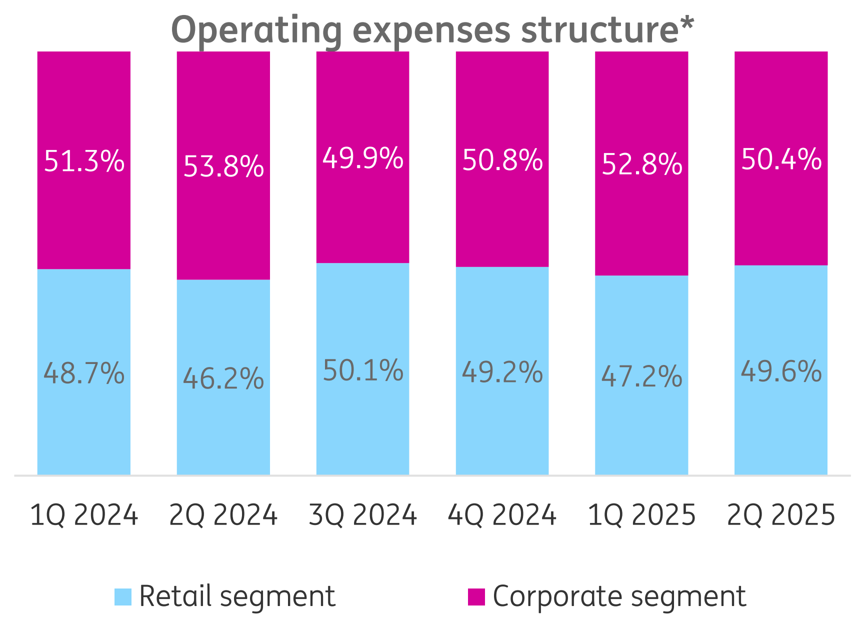
Employment in the ING Bank Śląski S.A. Group decreased from 8,194 FTEs at the end of June 2024 and 7,947 at the end of December 2024 to 7,840 FTEs at the end of June 2025.

Operating expenses (PLN million)



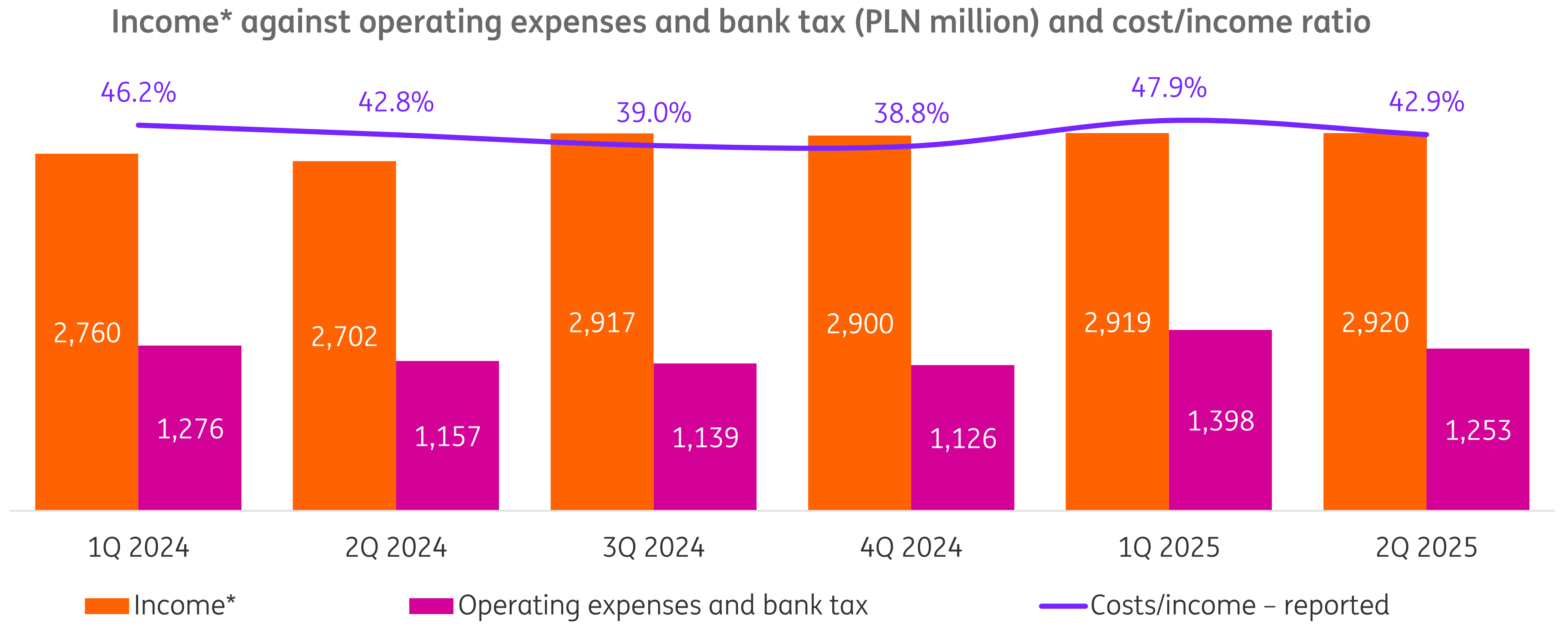
The operating expenses (including bank tax) of the retail segment increased by PLN 126 million y/y (+10.9%) to PLN 1,282 million, while the operating expenses of the corporate segment increased by PLN 92 million y/y (+7.2%) to PLN 1,369 million. Consequently, the retail segment's share of costs increased by 0.8 p.p. to 48.4% compared to H1 2024.





* Including bank tax.

Due to a higher growth rate in operating expenses (including bank tax) than in total income, the efficiency ratio – costs to income – decreased in H1 2025 versus the previous year. It was 45.4%, which means a growth by 0.9 p.p. r/r. The ratio of own costs alone (excluding regulatory costs and bank tax) to revenue was 34.2% in H1 2025 (-0.3 p.p. y/y).



** Including the share in net profits of associates accounted for using the equity method.*

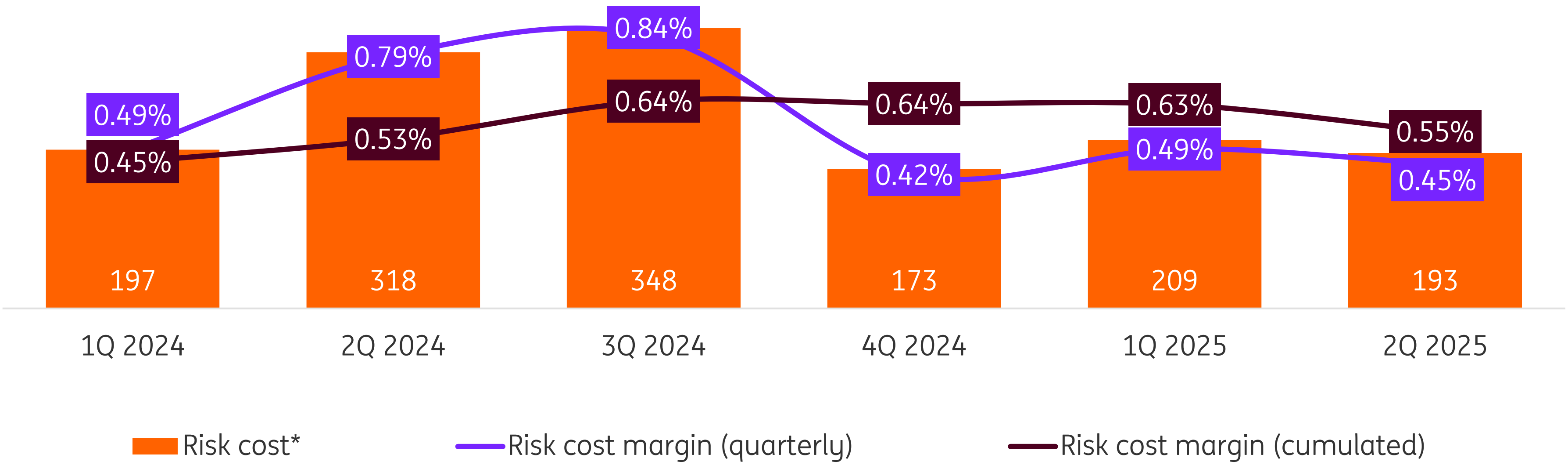
Allowances for expected losses

In H1 2025, there was a slight increase in the ratio of the cumulative (for the last four quarters) risk cost margin (the ratio of the allowance for expected losses and legal risk costs of FX mortgages to the gross loan portfolio), to 0.55% from 0.53% in the previous year.

In the retail segment, the cumulative cost of risk margin (including legal risk costs of FX mortgage loans) decreased from 0.18% in H1 2024 to 0.02% in H1 2025. This was due, among other things, to lower provisions for the legal risk of FX mortgage loans: PLN 66 million of provisions between Q3 2024 and Q2 2025 against PLN 133 million of provisions between Q3 2023 and Q2 2024. The second factor that had a positive impact on the retail cumulative risk cost margin was the sale of impaired portfolios: PLN -100 million of provisions between Q3 2024 and Q2 2025 versus PLN -22 million of provisions between Q3 2023 and Q2 2024.

In the corporate segment, the cumulative risk cost margin increased from 0.77% in H1 2024 to 0.94% in H1 2025, driven by the increase of risk for several clients in this segment.

Consolidated allowances for expected net credit losses and legal risk costs of foreign currency mortgage loans (PLN million)

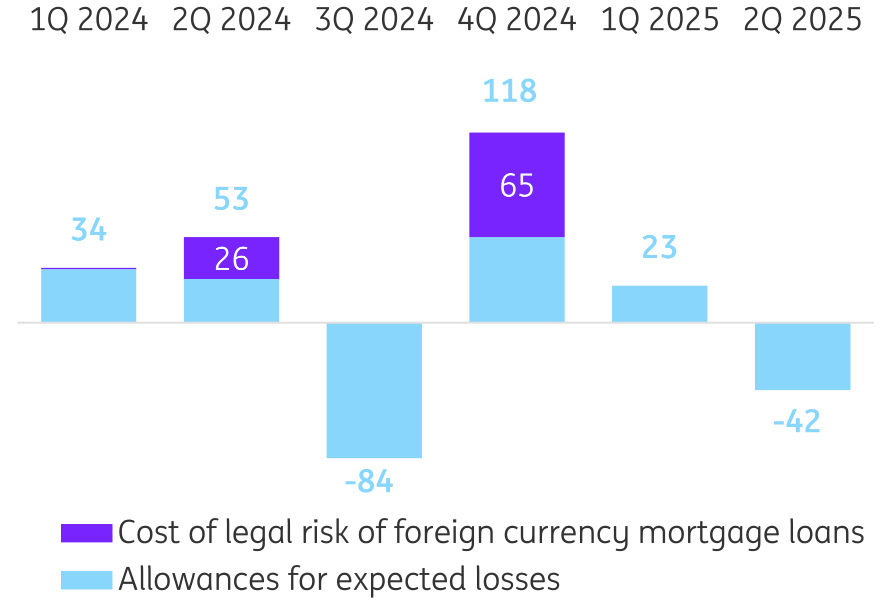


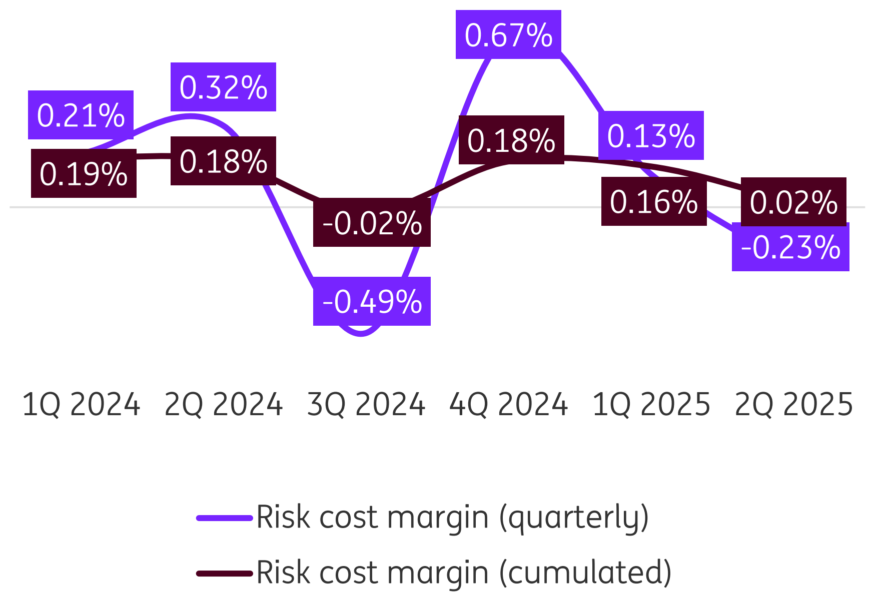
** Allowance for expected losses and legal risk costs of foreign currency mortgage loans.*

In H1 2025, the change in macroeconomic parameters in the models had a small positive impact on the level of expected credit loss allowances (reducing) of PLN 1 million (PLN -19 million in the retail segment and PLN +18 million in the corporate segment). In H1 2024, this impact amounted to PLN 53 million.

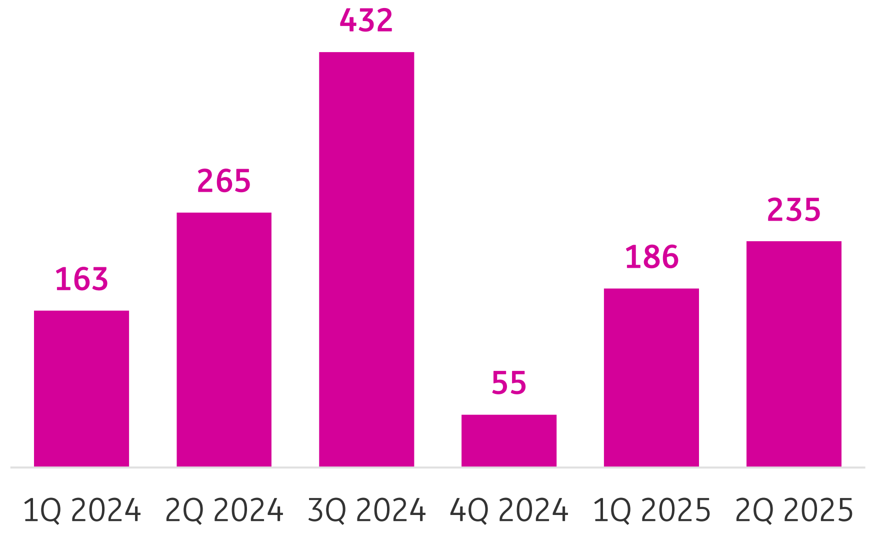
In H1 2025, the bank sold Stage 3 retail and corporate receivables. The positive impact of these transactions on the cost of risk amounted to PLN 45 million. The bank regularly sells Stage 3 receivables portfolios under its credit risk management policy. However, similar transactions did not take place in H1 2024.

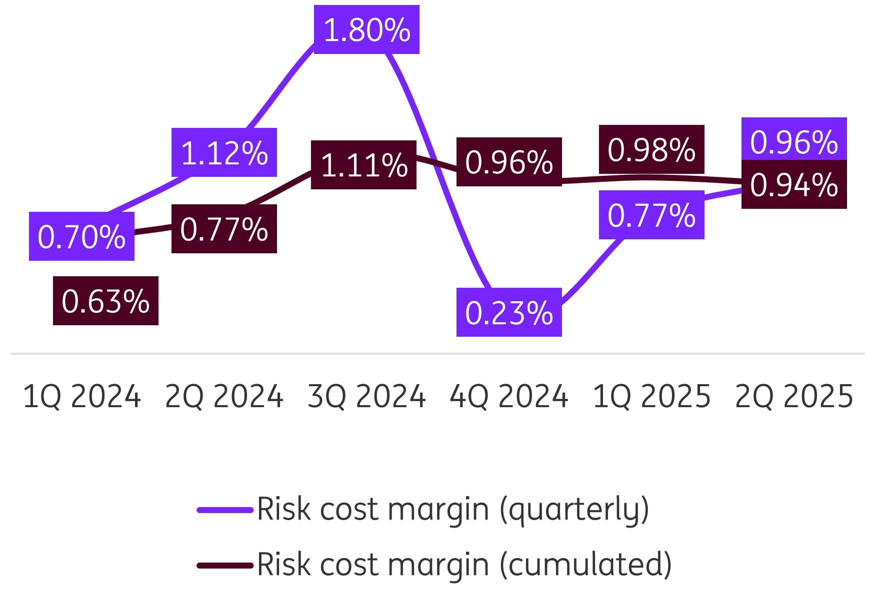
Allowances (and margin) for expected losses on net financial assets and legal risk costs on foreign currency mortgage loans in the retail segment (PLN million)





Allowances (and margin) for expected losses on net financial assets in the corporate segment (PLN million)





Income tax

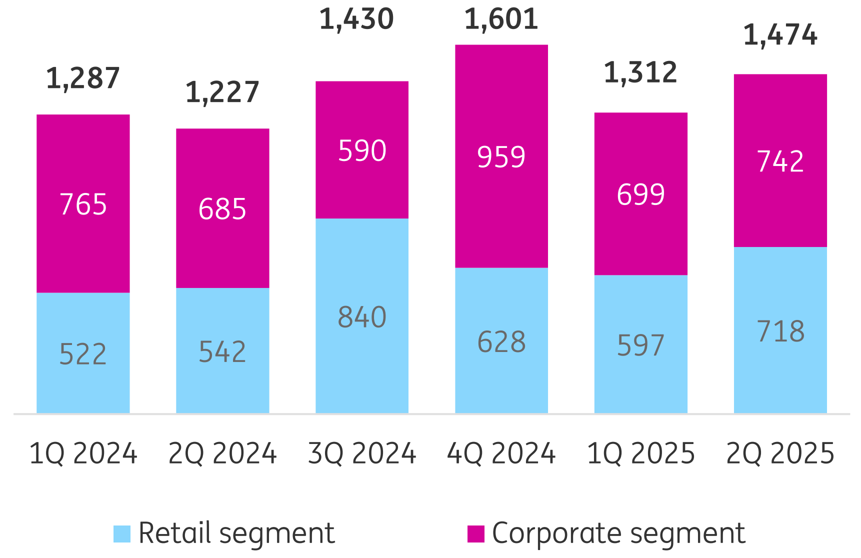
The ING Bank Śląski S.A. Group recognised income tax income of PLN 637 million in H1 2025. This was 14.6% higher than the previous year. The effective income tax rate was 22.9% versus 22.1% a year earlier.

Report by business segment

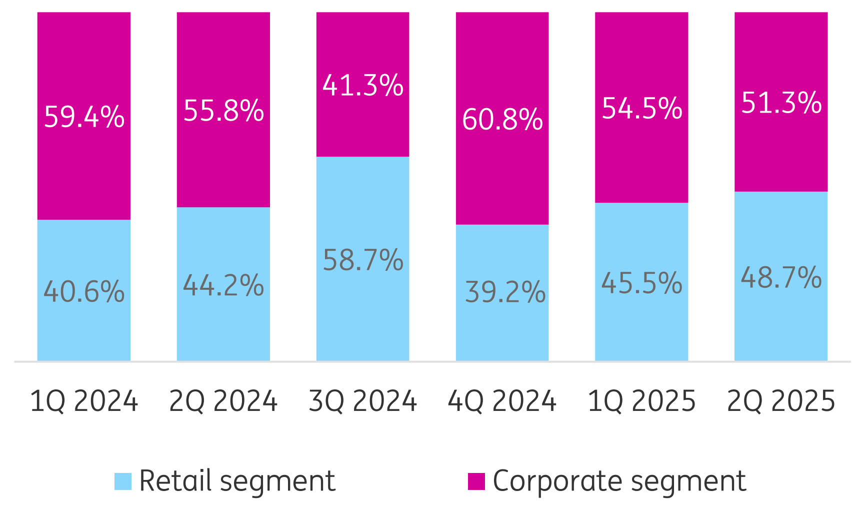
Our bank's business model is divided into two major segments:

- the retail banking segment, which serves individuals, including Private Banking clients,
- the corporate banking segment, which comprises service of entrepreneurs, institutional clients (commercial companies) and operations in financial market products.

Gross profit by segment (PLN million)



Gross profit structure



In H1 2025, results of the retail banking segment and of the corporate banking segment accounted for 47.2% and 52.8% of the Group's gross result respectively (last year: 42.3% and 57.7% respectively).

Gross result in retail banking segment

	H1 2024	H2 2024	H1 2025	Change H1 2025 to H1 2024	
PLN million				PLN million %	PLN million
Net interest income	1,942	2,211	2,123	181	9.3%
Net commission income	327	344	352	25	7.6%
Other income*	38	72	103	65	171.1%
Total income	**2,307**	**2,627**	**2,578**	**271**	**11.7%**
Operating expenses	**-1,007**	**-971**	**-1,116**	**-109**	**10.8%**
Risk cost**	-87	-34	19	106	-121.8%
Bank tax	-149	-154	-166	-17	11.4%
Gross financial result	**1,064**	**1,468**	**1,315**	**251**	**23.6%**

** Including net profit of associates accounted for using the equity method; **including legal risk costs of foreign currency mortgage loans.*

Gross result in corporate banking segment

	H1 2024	H2 2024	H1 2025	Change H1 2025 to H1 2024	
PLN million				PLN million %	PLN million
Net interest income	2,262	2,310	2,261	-1	0.0%
Net commission income	820	803	811	-9	-1.1%
Other income*	73	77	189	116	158.9%
Total income	**3,155**	**3,190**	**3,261**	**106**	**3.4%**
Operating expenses	**-1,060**	**-920**	**-1,141**	**-81**	**7.6%**
Risk cost	-428	-487	-421	7	-1.6%
Bank tax	-217	-220	-228	-11	5.1%
Gross financial result	**1,450**	**1,563**	**1,471**	**21**	**1.4%**

** Including net profit of associates consolidated using the equity method.*

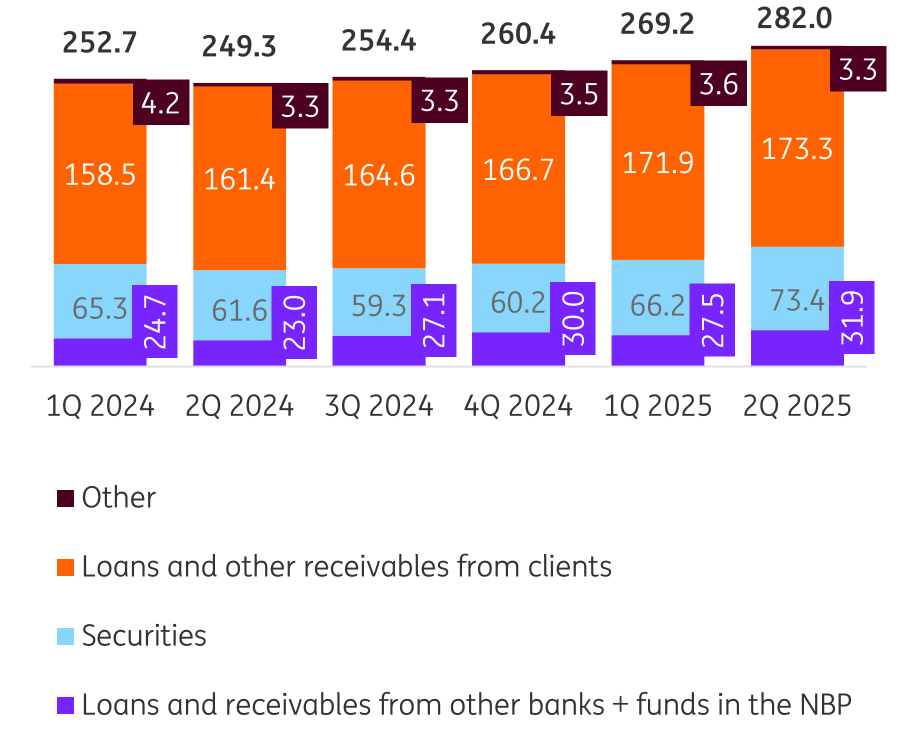
Statement of financial position

Assets

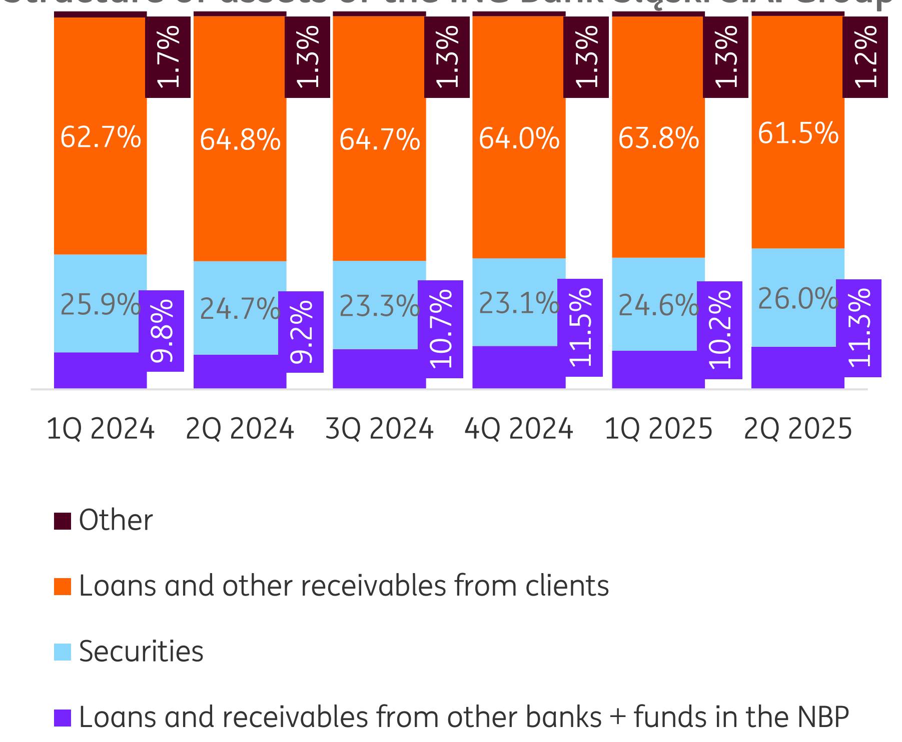
Total assets of the ING Bank Śląski S.A. Group amounted to PLN 282.0 billion at the end of June 2025. This implies that they were up by 8.3% (PLN 21.6 billion) compared to the end of 2024. The main growth factor was:

- securities portfolio, which increased by PLN 13.2 billion (+22.0% vs. 2024 year-end),
- the portfolio of loans and other receivables from clients with an increase of PLN 6.6 billion (+4.0% vs. 2024 year-end), and
- portfolio of loans and receivables from other banks and funds in the NBP (+6.5% vs. 2024 year-end).

Assets of the ING Bank Śląski S.A. Group (PLN billion)

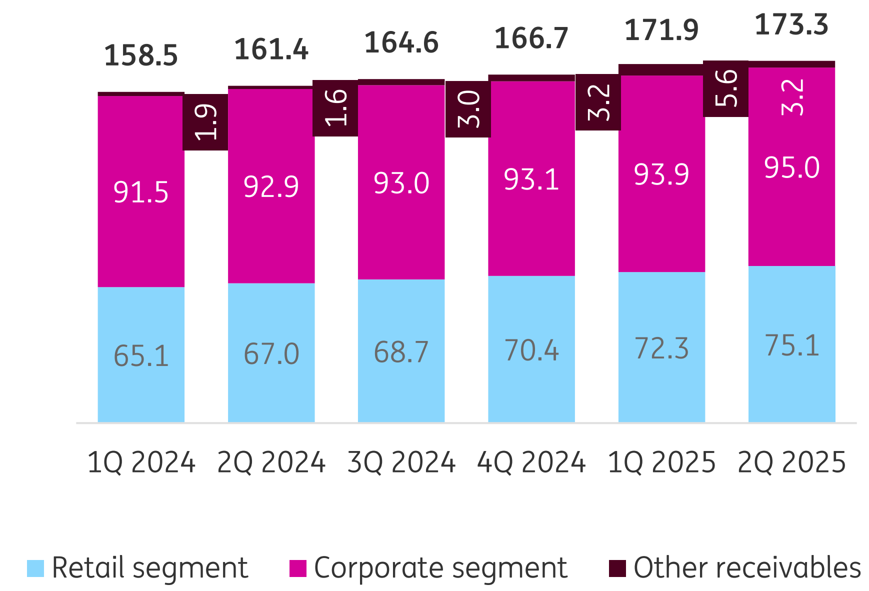


Structure of assets of the ING Bank Śląski S.A. Group

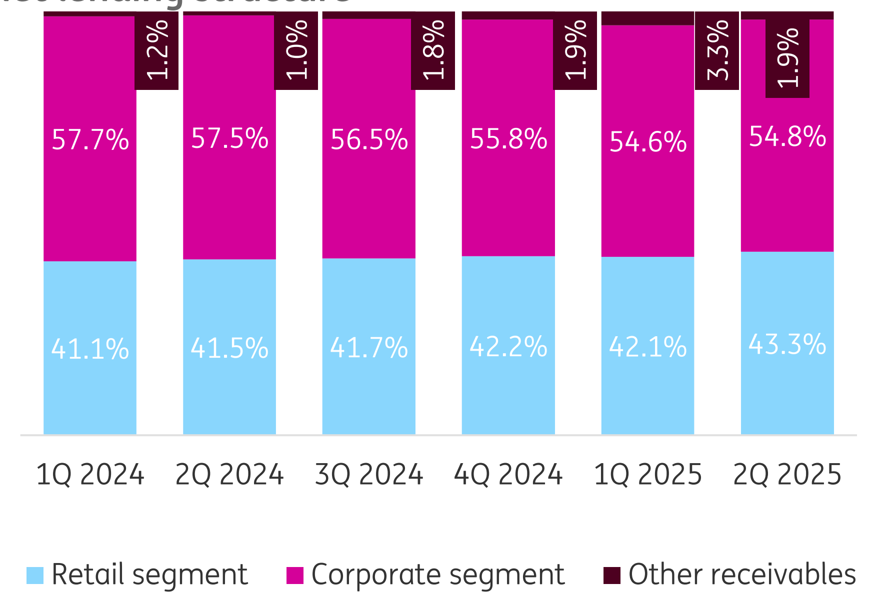


Retail segment receivables increased by PLN 4.7 billion versus the end of 2024 (+6.7%) and corporate segment receivables increased by PLN 1.9 billion (+2.1%). Thus, the share of the corporate segment in total receivables decreased by 1.0 p.p. to 54.8% versus 55.8% at the end of 2024, while the share of the retail segment increased by 1.1 p.p. to 43.3% at the end of H1 2025.

Net loans* by segment (PLN billion)



Net lending structure*



** Loans and other receivables from clients.*

Net receivables from clients					
	June 2024	December 2024	June 2025	Change June 2025 to June 2024	
PLN million				PLN million	%
measured at amortised cost	161,385	166,677	173,321	11,936	7.4%
measured at fair value through profit or loss	26	21	11	-15	-57.7%
Total	161,411	166,698	173,332	11,921	7.4%

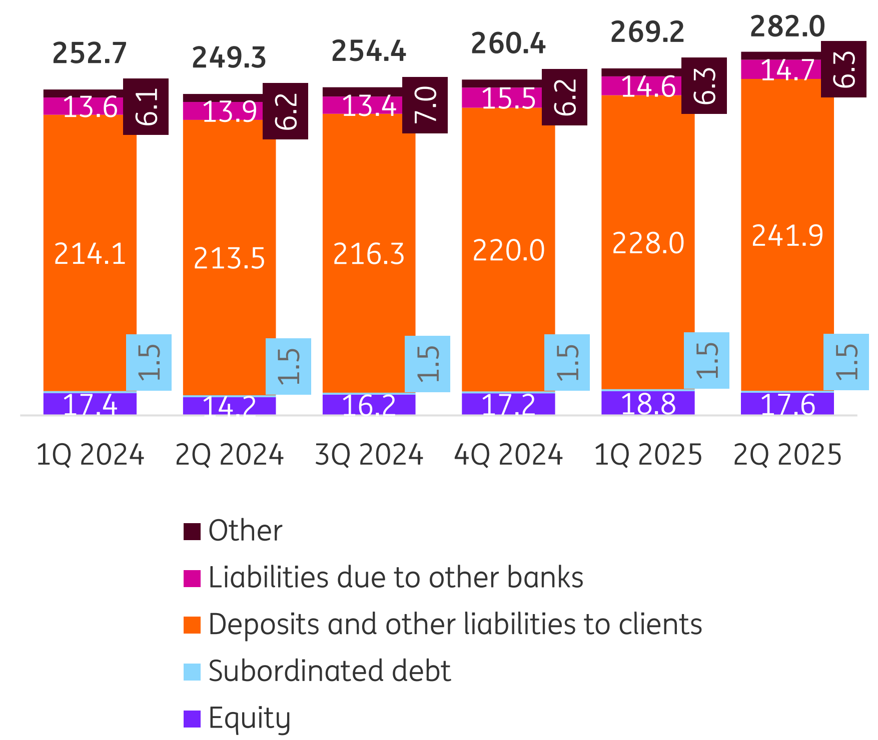
Net receivables from clients measured at amortised cost

	June 2024	December 2024	June 2025	Change June 2025 to June 2024	
PLN million				PLN million	%
Loan portfolio, of which:	**159,816**	**163,439**	**170,082**	**10,266**	**6.4%**
households	73,813	77,252	82,016	8,203	11.1%
business entities	82,956	83,355	84,662	1,706	2.1%
central and local government institutional sector	3,047	2,832	3,404	357	11.7%
Total, of which:	**159,816**	**163,439**	**170,082**	**10,266**	**6.4%**
Corporate banking	92,842	93,052	95,002	2,160	2.3%
overdrafts in current account	15,390	14,716	16,421	1,031	6.7%
term loans and borrowings	52,862	53,856	54,152	1,290	2.4%
lease receivables	13,399	13,342	13,552	153	1.1%
factoring receivables	7,011	6,571	6,524	-487	-6.9%
debt securities	4,180	4,567	4,353	173	4.1%
Retail banking	66,974	70,387	75,080	8,106	12.1%
mortgage loans and borrowings	58,080	61,114	65,336	7,256	12.5%
overdrafts in current account	622	624	617	-5	-0.8%
other loans and borrowings	8,272	8,649	9,127	855	10.3%
Other receivables, of which:	**1,569**	**3,238**	**3,239**	**1,670**	**106.4%**
opened call deposits	527	759	981	454	86.1%
receivables under repo agreements	0	1,040	1,100	1,100	-
other receivables	1,042	1,439	1,158	116	11.1%
Total	**161,385**	**166,677**	**173,321**	**11,936**	**7.4%**

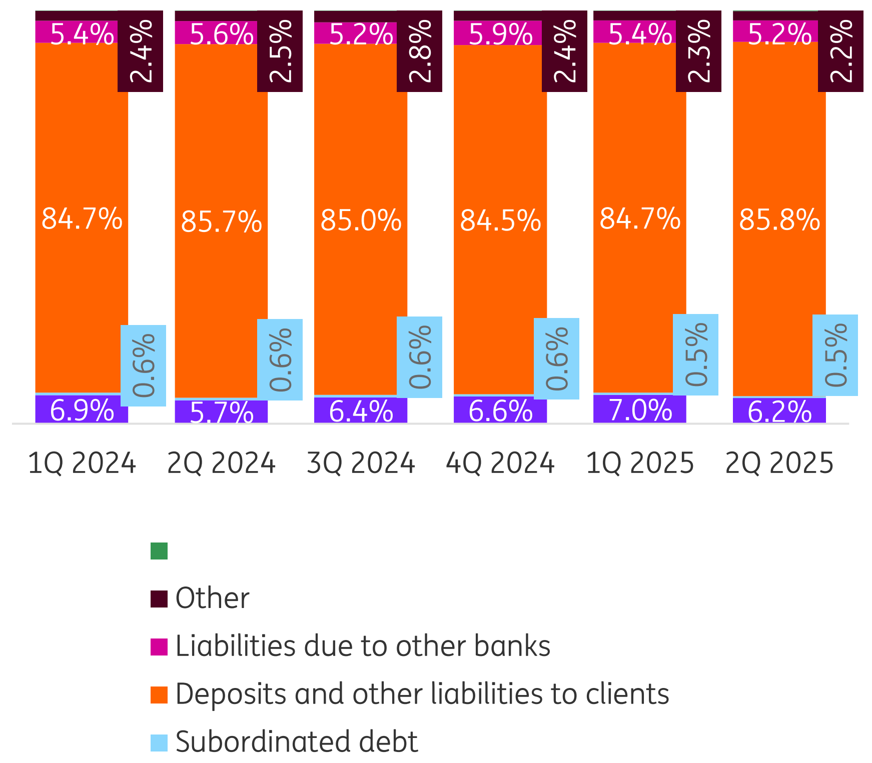
Equity and liabilities

The dominant source of financing of the ING Bank Śląski S.A. Group's operations was clients' funds. At the end of June 2025, liabilities to clients amounted to PLN 241.9 billion, or 85.8% of total liabilities. The bank's equity accounted for 6.2% of total assets and stood at PLN 17.6 billion at the end of June 2025. The increase in liabilities by PLN 21.6 billion compared to the end of 2024 was driven by an increase in deposits and other liabilities to clients by PLN 21.9 billion, with a slight increase in the bank's equity as a result of the payment of a total of PLN 3.3 billion in dividends to shareholders in the second quarter of this year (read more here).

Liabilities of the ING Bank Śląski S.A. Group (PLN billion)

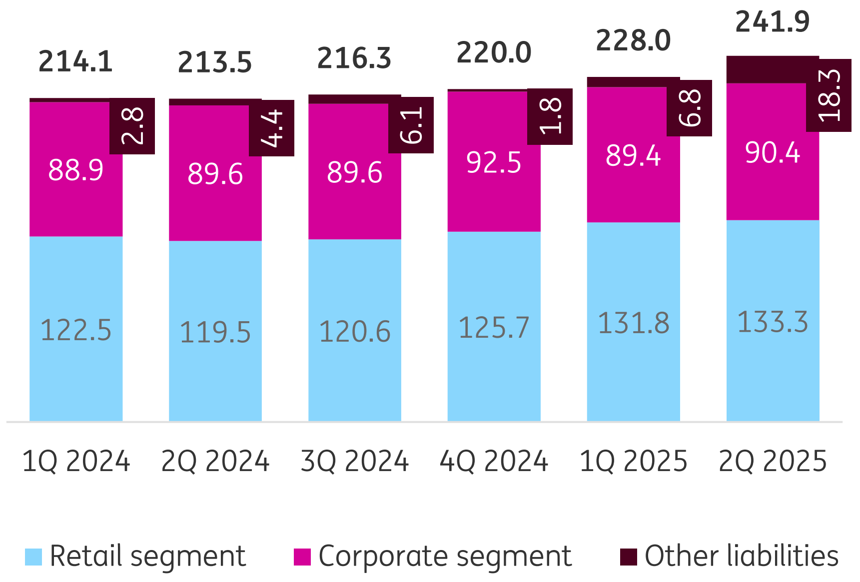


Structure of the ING Bank Śląski S.A. Group liabilities



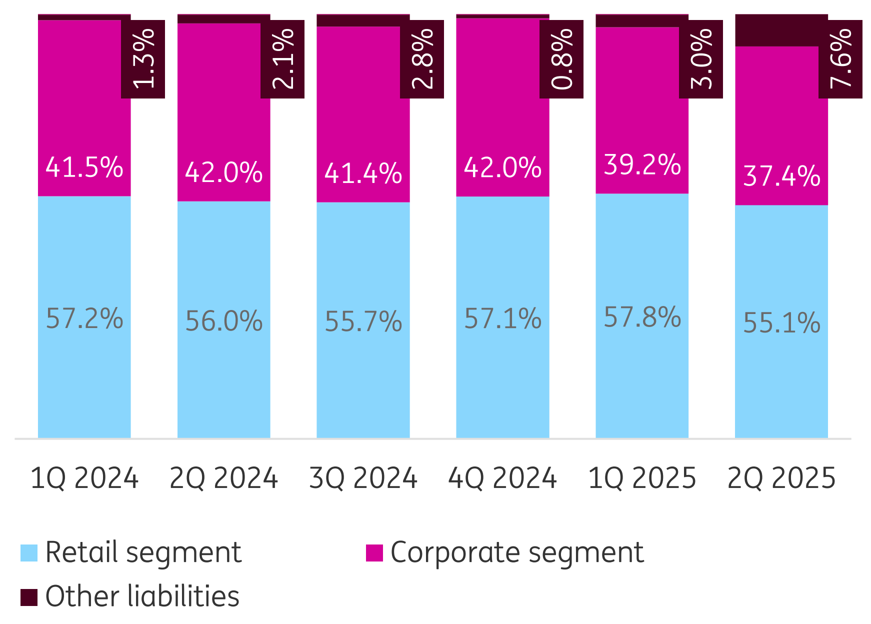
The 10.0% increase in deposits and other liabilities to clients compared to 2024 year-end was generated by repo liabilities (PLN +16.3 billion compared to 2024 year-end) and liabilities to clients in the retail segment (PLN +7.6 billion), with a decrease in liabilities to clients in the corporate segment (PLN -2.1 billion).

Deposits* by segment (PLN billion)



* *Deposits and other liabilities to clients.*

Structure of deposits*



Portfolio of liabilities to clients

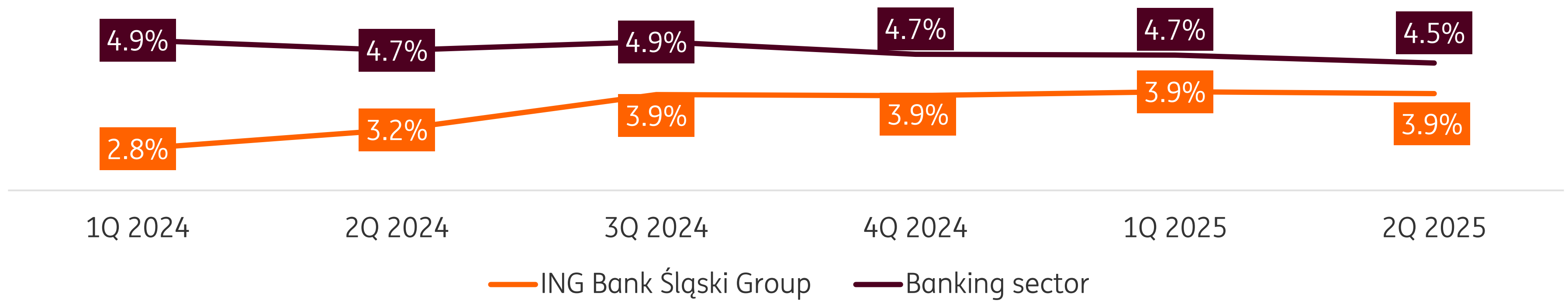
	June 2024	December 2024	June 2025	Change June 2025 to June 2024	
PLN million				PLN million	%
Deposits, including:	**209,157**	**218,148**	**223,650**	**14,493**	**6.9%**
households	131,808	139,725	146,145	14,337	10.9%
business entities	69,745	73,101	71,377	1,632	2.3%
central and local government institutional sector	7,604	5,322	6,128	-1476	-19.4%
Total, of which:	**209,157**	**218,148**	**223,650**	**14,493**	**6.9%**
Corporate banking	89,626	92,474	90,373	747	0.8%
current deposits	56,308	60,947	59,373	3,065	5.4%
saving deposits	18,595	20,010	19,910	1,315	7.1%
term deposits	14,723	11,517	11,090	-3633	-24.7%
Retail banking	119,531	125,674	133,277	13,746	11.5%
current deposits	30,757	31,850	33,868	3,111	10.1%
saving deposits	73,144	76,338	80,225	7,081	9.7%
term deposits	15,630	17,486	19,184	3,554	22.7%
Other liabilities, including:	**4,384**	**1,848**	**18,288**	**13,904**	**317.2%**
liabilities under monetary hedges	789	751	751	-38	-4.8%
repo transactions	1,998	0	16,307	14,309	716.2%
other liabilities	1,597	1,097	1,230	-367	-23.0%
Total	**213,541**	**219,996**	**241,938**	**28,397**	**13.3%**

Quality of the loan portfolio

Share of Stage 3 receivables and POCI

In H1 2025, the quality of our loan portfolio remained unchanged compared to the end of 2024. The share of Stage 3 and POCI loans in the ING Bank Śląski S.A. Group was 3.9% at the end of June 2025. Stage 3 and POCI loans in our group stood at PLN 6,719 million compared to PLN 6,462 million at the end of 2024 (up by 4.0%). In H1 2025, the quality of our loan portfolio was impacted by the sale of Stage 3 retail receivables. As a result of these transactions, gross loans decreased by PLN 224.2 million. There was no corresponding transaction in H1 2024. The quality of our bank's loan portfolios keeps being higher than the banking sector average when a comparison is made of the ratio of the share of Stage 3 loans. The share of Stage 3 receivables in the sector at the end of May 2025 was 4.5%.

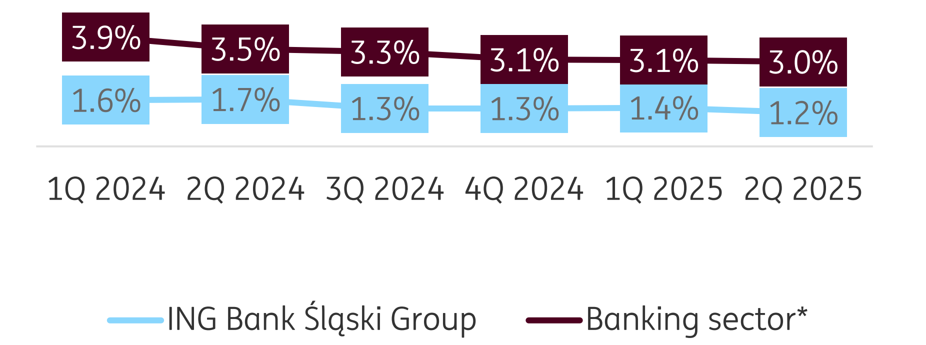
Share of Stage 3 loans at the ING Bank Śląski S.A. Group against sector average*



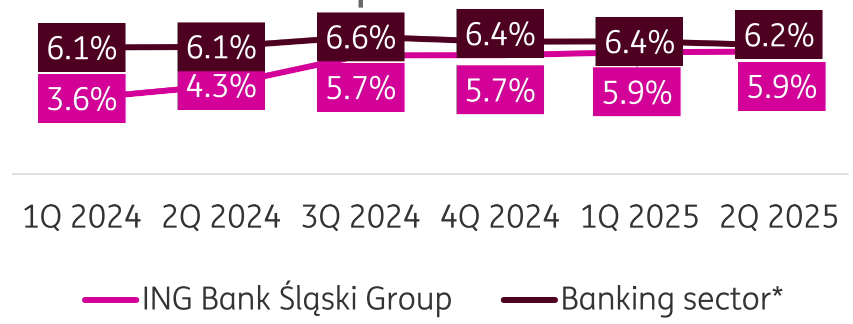
** Estimate on the basis of PFSA's data; data for May 2025 for Q2 2025 in the sector.*

Importantly, both our retail and corporate loans are of a higher credit quality than the respective averages for the entire banking sector. As at end of June 2025, the share of Stage 3 loans and POCI in the retail segment in the ING Bank Śląski S.A. Group accounted for 1.2% against 3.0% for private individuals in the sector (data for May 2025). Equivalent ratios for the corporate segment are 5.9% for the ING Bank Śląski S.A. Group and 6.2% for the corporate clients sector, respectively (data for May 2025).

Share of Stage 3 and POCI loans in the retail portfolio



Share of Stage 3 and POCI loans in the corporate portfolio

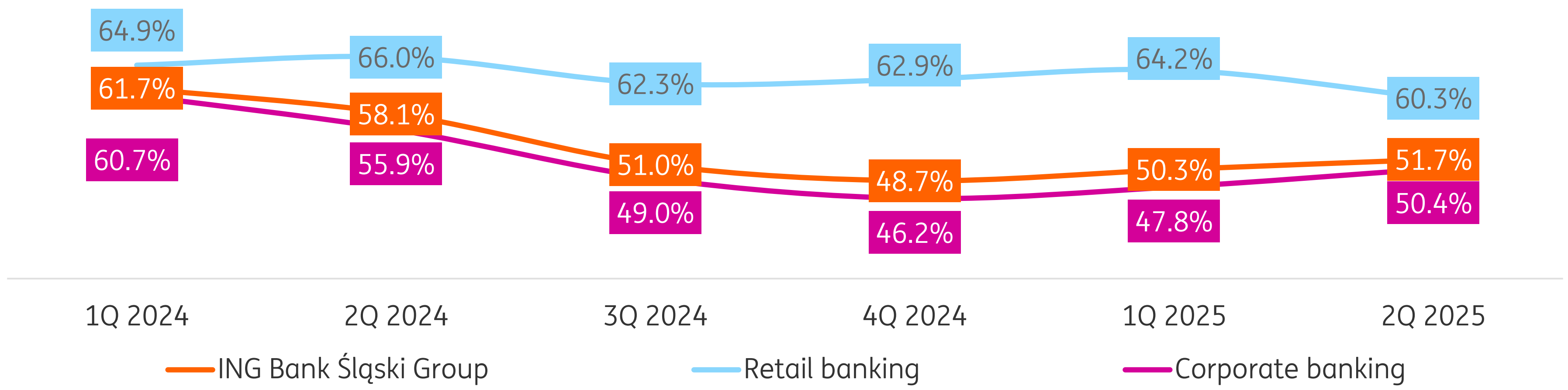


** Estimate on the basis of PFSA's data; data for May 2025 for Q2 2025 in the sector.*

Coverage of Stage 3 and POCI loan portfolio by allowances

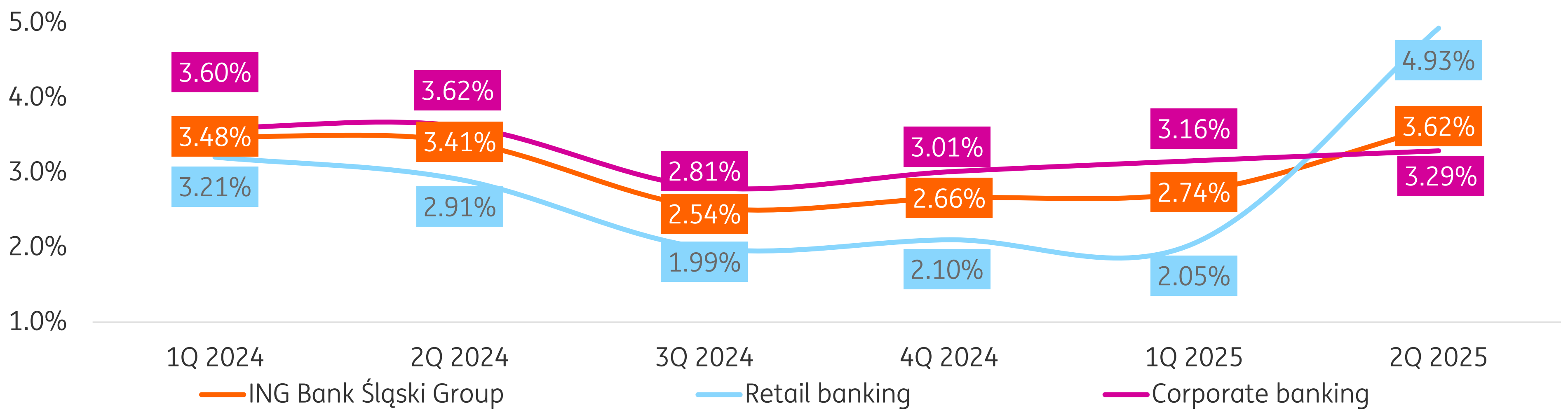
As at the end of June 2025, the ING Bank Śląski S.A. Group held provisions for the Stage 3 and POCI loan portfolio of PLN 3,472 million. The coverage of the Stage 3 and POCI loan portfolio with allowances was 51.7%.

Coverage ratio of the Stage 3 and POCI loan portfolio with allowances

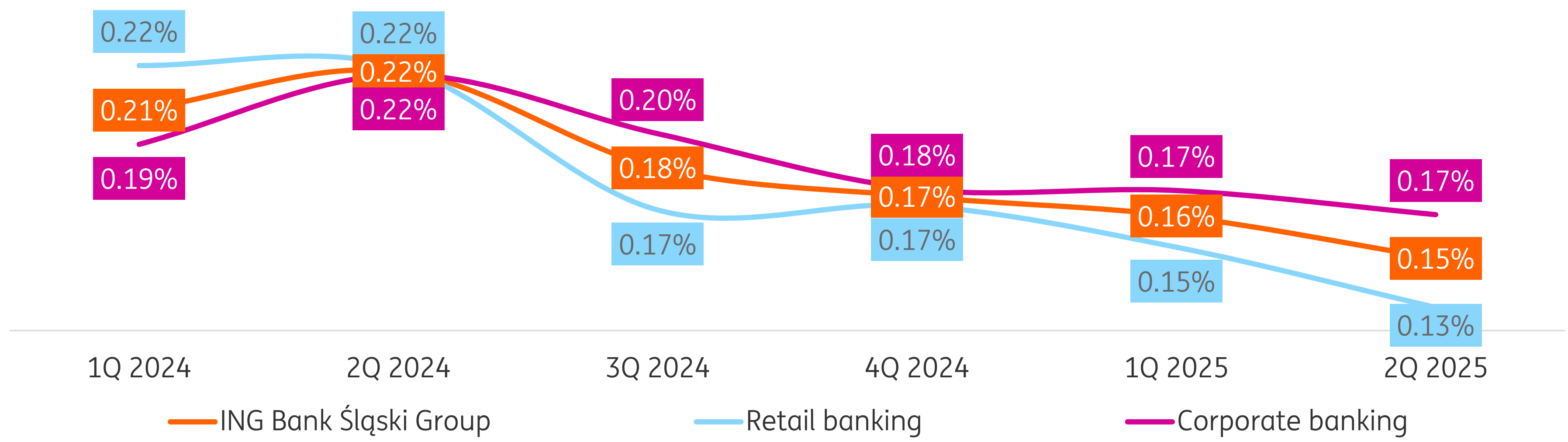


As at the end of June 2025, the ING Bank Śląski S.A. Group held provisions for the Stage 2 loan portfolio of PLN 526 million. The allowance coverage rate of the portfolio in stage 2 was 3.62% (+0.96 bps vis-à-vis the end of 2024). The increase in this coverage ratio was mainly due to the decrease in the retail segment's Stage 2 portfolio, particularly mortgages, as the impact of credit holidays on the quality of this portfolio was finally settled.

Coverage ratio of the Stage 2 loan portfolio with allowances



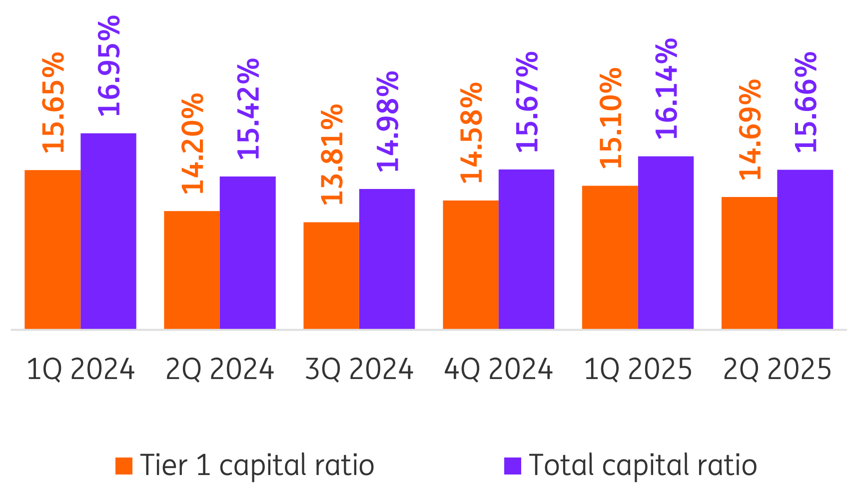
Coverage ratio of the Stage 1 loan portfolio with allowances



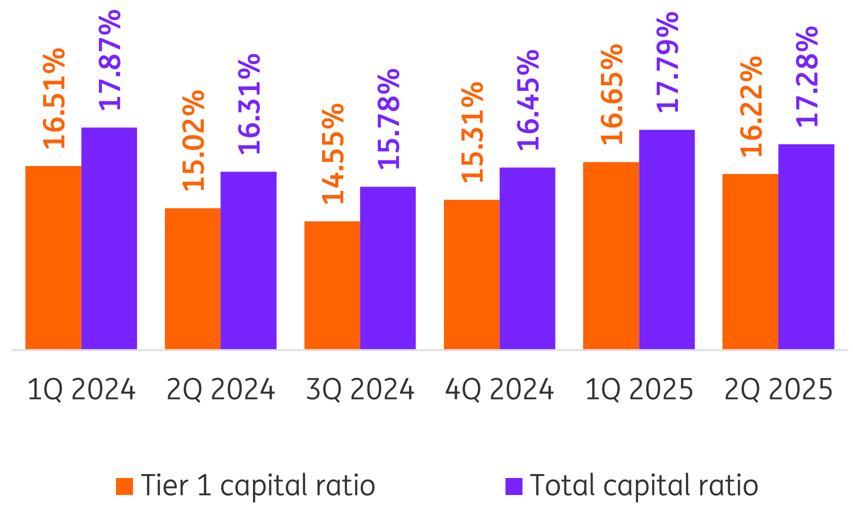
Capital adequacy

On 30 June 2025, the TCR (total capital ratio) for the ING Bank Śląski S.A. Group was 15.66%, compared to 15.67% at the end of 2024, and the Tier 1 ratio was 14.69% and 14.58% respectively.

Capital ratios for the ING Bank Śląski S.A. Group



Capital ratios for ING Bank Śląski



If the bank had not applied the transitional period for the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in accordance with Article 468 of the CRR, the total capital ratio and the Tier 1 capital ratio would have been respectively:

- at the consolidated level – 15.46% and 14.50%,
- at the standalone level – 17.06% and 16.00%.

Declared and paid dividend

Abridged history of dividend payment by ING Bank Śląski S.A.

	2020	2021	2022	2023*	2024
Dividend amount in a given year (PLN million)	663.5	689.5	0	4,338.8	3,275.9
Dividend amount per share (PLN)	5.10	5.30	0	33.35	25.18
Dividend payment rate (to consolidated profit)	49.6%	29.9%	0%	97.7%	75.0%
Dividend payment rate (to the share price on the dividend rights acquisition day)	2.0%	2.3%	0%	11.0%	8.5%

**Including: PLN 3,330.5 million from the bank's 2023 profit, representing 75% of ING Bank Śląski S.A.'s separate and consolidated 2023 profit, and PLN 1,008.3 million from the dividend reserve. The amount of PLN 1,008.3 million consists of: PLN 494.4 million in profit for 2019 and PLN 513.9 million in profit for 2022.*

Dividend from 2024 profit

In 2025, ING Bank Śląski paid a dividend from its 2024 profit.

The Bank Management Board recommended to the General Meeting a dividend for 2024 of PLN 3,275.9 million, representing 75% of ING Bank Śląski's separate and consolidated profit for 2024. The proposed dividend per share was PLN 25.18 gross. The amount of the dividend provides both for the current financial situation of the Group and the Bank and their development plans. We provided information in this regard current report of 5 March 2025. In the current report of 13 March 2025, the Bank Management Board informed of a letter from the PFSA containing an individual dividend recommendation.

The General Meeting of 29 April 2025 adopted a resolution on dividend payment as proposed by the Management Board. We reported on this in our current report of 29 April 2025. The dividend was distributed on 12 May 2025.

Dividend from 2023 profit

In 2024, ING Bank Śląski paid a dividend from its 2023 profit.

The Bank Management Board recommended to the General Meeting a dividend for 2023 of PLN 3,330.5 million, representing 75% of ING Bank Śląski's separate and consolidated profit for 2023, and PLN 1,008.3 million from the dividend reserve, totalling PLN 4,338.8 million. The total dividend per share is PLN 33.35 gross. The amount of the dividend provides both for the current financial situation of the Group and the Bank and their development plans. We provided information in this regard current report of 6 March 2024. In the current report of 21 February 2024, the Bank Management Board informed of a letter from the PFSA containing an individual dividend recommendation.

The General Meeting of 11 April 2024 adopted a resolution on dividend payment as proposed by the Management Board. We reported on this in our current report of 11 April 2024. The dividend was distributed on 6 May 2024.

More information on dividend policy of our Bank and the history of dividend distribution can be found at: https://en.ing.pl/company-profile/investor-relations.

Our resources and infrastructure

On-line banking

Moje ING is intuitive online and mobile banking that combines traditional financial products with modern digital services, responding to the real needs of users. In addition to managing accounts, savings and loans, clients can use additional functionality there to support their daily finances, including purchasing public transport tickets, controlling subscriptions and using budget analysis tools. Moje ING provides convenient and secure access, allowing you to handle most financial matters remotely.

Moje ING – individual clients

In H1 2025, we introduced solutions that enhance security and self-service for our clients and we kept developing our existing processes.

<u>**Security and accessibility**</u>

New authorisation factors:

- interactive mobile authorisation – we have introduced a new way of confirming operations to further protect against fraud. Now, in addition to entering the PIN code in the app, the client will be asked to provide some information about the instruction beforehand. This solution works in a similar way to the familiar question when confirming operations by voice (Voice Code);
- NFC-enabled card in the application activation process – we have introduced a change to further reduce fraud and provide an alternative to the Voice Code factor, which is problematic for hearing-impaired people to listen to. When authorising an instruction, the client is asked to apply the bank card to the NFC reader on the smartphone.

Greater accessibility in Moje ING

In preparation for the implementation of the EAA (European Accessibility Act) directive, we have introduced a number of changes and improvements in Moje ING related to process accessibility and facilitating clients' convenient access to information about their finances, including better visibility of the balance and details of the products held by clients, or a context menu to set the visibility of amounts, accounts and funds. These measures aim to ensure full compliance with regulatory requirements and improve the experience of all users, including those with disabilities.

<u>**Convenience and usability**</u>

Changes to the Offer section

We are introducing new home page views for the Offer section in Moje ING. This is the final stage of the redesign, which aims to adapt to WCAG requirements, the new illustrative style and the usability aspects of using the mobile app. The changes include, inter alia, a revamped menu, expanded segmentation and the implementation of a dedicated offer view for the minor, mass, Premium, Private Banking and business client segments.

VISA Offers 2.0

In June 2025 ING was the first bank in Poland to release a new version of its Visa Offers Programme for retail clients making payments with Visa cards. They do not need to activate the offer before purchasing – they just need to pay with a Visa card issued by ING, including using their phone or watch. Clients will be reimbursed a portion of the amount spent for Visa purchases from Programme partners.

Changes to the Parent Panel

Parents or legal guardians of children with ING records will be able to change the data of their children under the age of 18 themselves. Changes will be possible without the need to contact the helpline or visit a branch, which will significantly increase convenience and speed of service.

Development of ING Bank Śląski's Voicebot – Inga

- We taught Inga new information skills on a number of topics, such as the bank register, inheritance matters, BLIK – phone number, card fee, PIT return mailing, policy terms and conditions, phone payment activation and foreign currency account offers, among others.
- In terms of task skills, Inga is already able to cancel pre-ordered cash and activate cards on the hotline – without the involvement of a specialist.
- We have prepared Inga to be able to send PUSH notifications with a link to the self-service process on the following topics: card complaint/replacement, change of client details (statements), change of a card PIN code.

- We have implemented call transcription functionality, which allows specialists to quickly view a client's conversation history with Inga.
- We have also implemented the first version of the "James Bot", a solution that aims to reduce the time it takes for a specialist to talk to a client. During the client's conversation with Inga, information is retrieved in the background about what communication the client has previously received from the bank. When the call is switched to a specialist, he or she sees the downloaded data, eliminating the need to ask additional questions.

<u>Everyday banking</u>

BLIK recurring payments

We have made the new BLIK recurring payment service available to clients. This is a facility for clients to easily and conveniently manage recurring charges in the app such as for subscriptions. The new iteration of the service is based on the intuitive, simple activation of BLIK recurring payments and the ability to automatically collect payments of variable amount and frequency.

Possibility to add accounts and cards from Revolut to Moje ING

Based on the voices of our clients, we are developing services based on open banking and making it easier for them to bank. In January this year, we were the first in the market to provide a preview of accounts and cards from Revolut in Moje ING. Our clients can enjoy the convenience of viewing account balances, viewing history and analysing transactions all in one app.

Client card unlock management

Clients can confirm in the app the unblocking or stopping of a card that has been blocked by the bank for security reasons. We have provided functionality in Moje ING that allows clients to check for themselves why a card is blocked (a list of suspicious transactions) and decide whether to unblock or block it if, for example, they do not recognise the transaction and there is suspicion that it has been used by someone else.

VISA Infinite Card

We have made the Visa Infinite credit card application process fully automated in Moje ING. Clients can order the card together with a comprehensive travel insurance package and nominate beneficiaries. In the details of the card ordered, clients have information about additional programmes such as Priority Pass airport lounges, concierge, insurance.

Annexes for a cash loan

We have implemented a fully automatic annexation process for a cash loan. Clients can change the instalment payment date, shorten the loan period and change the instalment amount after overpayment of capital.

Moje ING – Entrepreneurs

In H1 2025, we introduced solutions that enhance security and self-service for our clients and we kept developing our existing processes.

New product page for foreign currency accounts

We have revised our foreign currency accounts product page to comply with WCAG 2.1 requirements. We have introduced updated and clearer communication on these accounts, which will give clients easier access to key information about our offering.

New authentication methods

We have prepared new authentication methods, such as support for mObywatel or NFC contactless cards. With these methods, our business clients, without visiting a branch, can activate their first U2F key themselves by confirming the instruction remotely.

Login sharing

We have provided clients with the option of combining their individual login with their company login, so that they can access all their banking in one place, without having to log in.

ING Business – corporate clients

The online banking platform – ING Business – is designed for corporate clients (companies operating as a company, i.e. other than entrepreneurs, who are serviced through Moje ING). The ING Business consists of a browser version, native smartphone applications and a H2H channel – ING WebService. We are successively working on further regular updates and releasing new important features.

Mobile application

In H1 2025, we provided clients with further features within the ING Business mobile app: the ability to verify the addition of a card to Apple Pay within the mobile app and a brand new Documentation module. The Documentation module provides a convenient overview of documents in force, as well as the ability to work on documents in development. Clients can add attachments, sign, send and reject new documents, exactly as in the browser-based version of ING Business.

Rights management

We have implemented a completely new, simplified entitlement management model for the smallest companies. Clients now have the ability to give or change permissions to their employees based on clear roles and, when necessary, adapt them to their needs.

Currency and domestic transfers

In H1 2025, we made the new domestic and foreign currency transfer formats – built with new technology and design – available to our first clients. Their implementation was preceded by a series of studies and experiments with clients, making it as simple as possible to fill them in. The new templates also allow transfers to be signed using mobile authorisation instead of text messages.

New applications in the system

We have made completely new applications available to clients in the system:

- WebService application – which allows you to apply for the service, learn about its capabilities and documentation, and start using it without signing an agreement;
- a request to manage login restrictions – in which clients can specify additional restrictions on user logins – such as limited time (selected hours or days of the week) or the IP range from which logins are possible.

Our meeting places

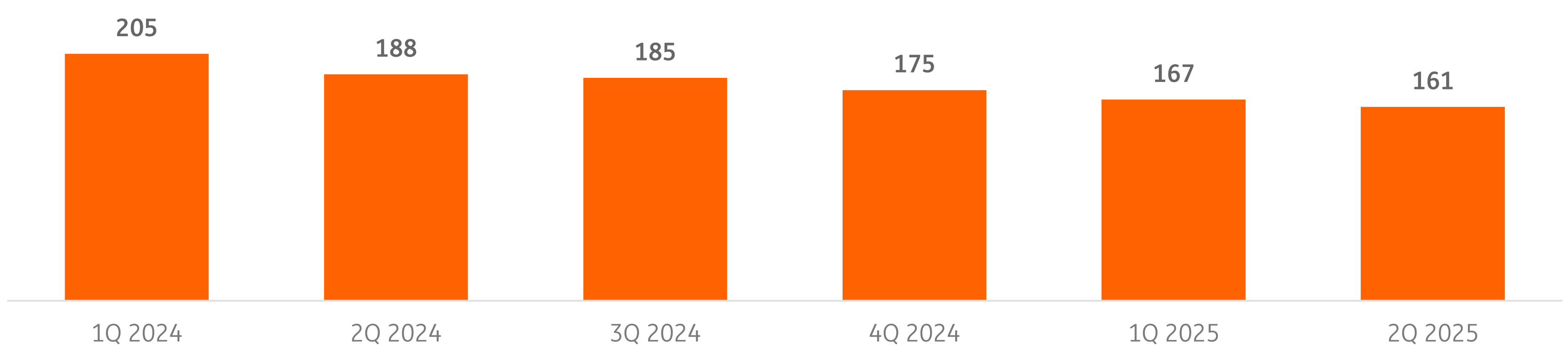
At the end of Q2 2025, ING Bank Śląski had 161 retail meeting places. All our meeting places are equipped with self-service areas where clients can both withdraw and deposit cash themselves. The bank continues to modernise its meeting places by replacing equipment and interior decoration and by implementing new functional solutions.

At the end of June 2025, the bank also had 56 ING Express sales outlets located in major shopping centres across Poland and 55 cash service points where only cash at the counter (deposits, withdrawals) can be dealt with.

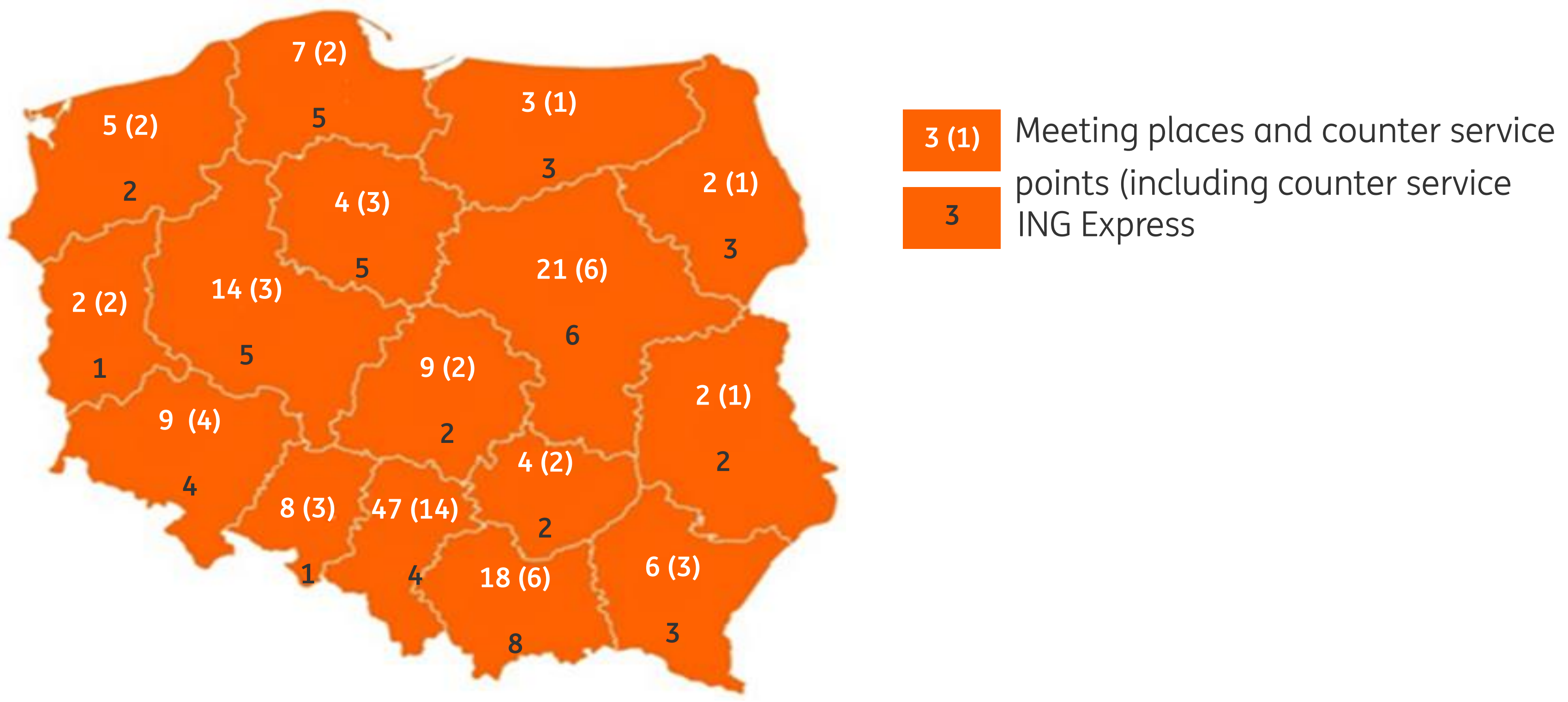
Our outlets were normally available to clients for seven hours (10 am – 5 pm) on Mondays, Tuesdays, Thursdays and Fridays and five hours on Wednesdays (10 am – 3 pm).

Contact Centre specialists were at our clients' disposal 24/7 at all times.

Number of our bank outlets



Structure of the distribution network at the end of Q2 2025



Our bank serviced corporate clients in the medium-sized and large business segment through 29 business banking centres and 14 corporate banking centres. Almost all of them operated in the same locations as retail branches. The largest strategic clients, meanwhile, were served by the Sector and Product Departments in the Strategic Client Area based in Warsaw and through the regional office in Katowice.

As at the end of June 2025, there was a network of 857 recyclers available to clients – devices with a deposit-withdrawal function, all with a contactless reader.

Human resources management

Headcount

As at 30 June 2025, the ING Bank Śląski S.A. Group employed 7,890 people (of which ING Bank Śląski S.A. employed 7,452 people). The number of employees increased by 111 versus December last year. The reported decrease in headcount is due to the continuation of a multi-year project to evolve the bank's organisational structure, including above all the further optimisation of the number of outlets and the development of digital channels in the retail segment, the redesign of the organisational structure and processes in the corporate segment and the optimisation and automation of processes in the bank's business area support units.

Employment in the ING Bank Śląski S.A. Group	31 December 2024	30 June 2025
Head Office in Katowice	3,744	3,716
Head Office in Warsaw	1,254	1,268
Branches	2,555	2,468
Total bank	**7,553**	**7,452**
ING Lease (Polska) Sp. zo.o.	218	212
ING Commercial Finance Polska S.A.	109	107
ING Bank Hipoteczny S.A.	32	30
ING Usługi dla Biznesu Sp. z o.o.	33	32
Nowe Usługi S.A.	3	3
SAIO S.A.	22	24
Paymento Financial S.A.	31	30
Total subsidiaries	**448**	**438**
ING Bank Śląski Group	**8,001**	**7,890**

Remuneration policy

At the Ordinary General Meeting held on 29 April 2025 a report was presented in the functioning of the remuneration policy at ING Bank Śląski in 2024 in line with the guidelines of the "Principles of Corporate Governance for Supervised Institutions". The General Meeting found the remuneration policy pursued by the Bank as supporting the development and security of the Bank's operations.

Fixed remuneration

In H1 2025, ING Bank Śląski S.A. maintained the core task of the remuneration policy to effectively support strategic objectives. The assumptions underlying the policy include market levels as well as transparency and consistency of remuneration offered to employees. We have followed a consistent remuneration policy for many years. In the last years, we have paid particular attention to the pay gap, which we identify on the basis of the *gender pay gap* and *equal pay for equal work* indicators, as well as pay benchmarks. These analyses allow us to plan the assumptions of pay rise actions so as to gradually eliminate the gap – which is one of the main objectives of the HR strategy.

Based on the results of a market analysis taking into account macroeconomic conditions and the level of inflation, the Bank Management Board has decided to launch a pay rise action targeting employees on 1 April 2025. The action assumed an increase in the ING Bank Śląski Group's base salary fund by 6%.

The main assumptions of the pay rise action were:

- An increase in the minimum salary to PLN 6,000 gross full-time. This represents an increase of PLN 500 versus the previous minimum.
- The introduction of a new pay scale, where we will increase the minimum wages in categories 11 to 15.
- Discretionary pay rises are intended for employees who stand out with their competence and good performance.

The indicated rises of the pay fund do not include higher salary costs related to completed employee promotions.

2025 is the next year of the hybrid working model, for which a remote working allowance is paid to offset its costs. In December 2024, the allowance was paid to all employees. This allowance compensates for the costs of remote working for 2025. In addition, after the end of each quarter, an adaptation allowance is paid to employees newly recruited and those returning from long-term absences.

Variable remuneration

The bonus amount for 2024 for each employee was subject to assessments in two areas:

- work results,
- orange behaviour.

The bank also settled the bonus of employees covered by the *Variable Remuneration Policy for Identified Staff of ING Bank Śląski*. In accordance with the policy, variable remuneration is deferred and at least 50% is paid in financial instruments.

In H1 2025, a portion of the non-deferred bonus for 2024 and a portion of the deferred bonus for 2018 and 2019 (applicable to the President of the Bank Management Board), 2020, 2021, 2022 and 2023 Identified Staff were paid. A portion of the variable remuneration awarded in phantom shares for these years was also settled.

Implementation of the new approach to variable remuneration for Identified Staff

Since 2022, the bank has had an incentive programme in place for persons with a significant influence on the bank's risk profile, under which treasury shares are awarded free of charge as a component of variable remuneration within the meaning of the Regulation of the Minister of Finance, Funds and Regional Policy.

We provide more information on this topic in the subsection Bank share-based incentive scheme

Recruitment and development of the image of the organisation as a desirable employer (*employer branding*)

The employer brand is based on a strong organisational culture in which all employees play a key role as ambassadors of our brand. The image of the organisation as an attractive, inclusive and responsible workplace is shaped in the eyes of both current and potential future working people. We are building it through consistent measures aimed at developing competence, fostering team commitment, creating a friendly working environment and transparently communicating the company's values.

In H1 2025, we realised our brand positioning through thoughtful and consistent actions in the external and internal spaces. We have been present at job fairs and industry conferences, where we are building recognition and trust in the organisation. We have also worked actively with the academic community, including through formal partnerships with universities. In order to strengthen visibility, we organised networking events such as meet-ups targeting specific groups of candidates. In addition, we have launched a new website dedicated to the career area, which presents our offer, values and promotes current job vacancies in a modern way.

Communication activities promoting the ING brand as an employer

In H1 2025, we supported recruitment activities on social media, mainly on LinkedIn, Instagram and the bank's career page. We reached out to candidates through the publication of content linked to the daily working life at the bank: from job offers, to recruitment activities, to the activity of managers, recruiters and employees building their networks. Our careers page provides a consistent and transparent search for jobs and internships, as well as information about working at ING. We maintain a high level of traffic to the careers site, both in terms of the number of users and time spent on the site, and it is the first source for male and female candidates in applying for job vacancies.

Job fair

In H1 2025, we carried out numerous activities targeting young people and professionals with work experience. We used varied forms of outreach from attending industry events such as conferences, webinars, workshops or expert speeches, also being at job fairs. In the past six months, we have been present at events such as B in Banking at the Warsaw School of Economics, Jobicon, the IT Job Fair at Warsaw University of Technology, Warsaw IT Days and at one of the largest events aimed at women working in IT, STEM and technology – the Women in Tech Summit.

Candidate experience survey

We keep paying particular attention to our candidates' experiences and impressions during and after the recruitment process at the Bank. On an ongoing basis, we measure the satisfaction of external and internal applicants with the recruitment processes conducted at the bank and its subsidiaries.

In H1 2025, the Net Promoter Score for external candidates was 65. This result indicates that the experience of male and female candidates in ING recruitment processes is very positive.

We also attach great importance to forming a positive and collaborative partnership with Hiring Managers. In order to accurately measure the experience, we launched the Hiring Managers' Satisfaction Survey on the recruitment process. The Net Promoter Score obtained in this survey – 95 – is our pride and indicates the very high quality of the service offered by the Recruitment Expert Team.

Based on the results of the survey and the NPS study of the recruitment process, we are developing on-going improvements to the process to foster an even better experience for applicants to the bank and its subsidiaries –

based on the voice of candidates and applicants from the H1 2025 surveys, in collaboration with Hiring Managers and Managers, we are placing particular emphasis on the timing of recruitment and the time and form of feedback given to applicants.

At the same time, we continue to publish a quarterly newsletter for bank recruiters, describing best recruitment practices on topics such as providing feedback to applicants, recommended recruitment times or the essence of the role of managers and hiring managers in the recruitment process.

Of particular importance in our activities are the candidates and candidates of internal recruitment, whose development and satisfaction are our priority. We regularly monitor the level of satisfaction with participation in internal recruitment processes, including through the NPS indicator survey, which allows us to systematically improve the quality of these processes. To ensure transparency and ongoing access to information, we operate a dedicated communication channel where current internal job vacancies are published and internal job fairs are held with open roles and developmental internships available. In addition, we offer simulated recruitment interviews to enable male and female employees to develop their competences and be better prepared to participate in processes, which directly supports their professional development and reinforces the organisation's culture based on internal career paths.

Effective recruitment

The Recruitment Department introduced a collaborative recruitment process policy called "Recruitment SLA" at the beginning of 2025, which aims to ensure the smooth and timely execution of recruitment processes, while ensuring a positive candidate experience, the application of good practices and compliance with the bank's security standards.

In H1 2025, the average recruitment time was 22 days, while the time from starting the recruitment process to making an offer to the selected person was 37 days.

The main source of candidates remains the ING Careers website, which confirms its effectiveness as a key channel for reaching jobseekers. Recruitment processes are carried out in a fast and safe manner, with high quality and attention to the bank's positive image as an employer.

In addition, it is worth noting that important brand ambassadors are the bank's male and female employees, who are actively involved in recommending new people for jobs. We are continually improving and making our Employee Referral Programme more attractive. In H1 2025, we received 747 referrals and, of these, we invited 36 people to work with us.

Student internships

In H1 2025, we launched 3 internship programmes dedicated to young talents seeking a path of development in the world of finance and banking. The programmes vary in the duration of the internship in order to adapt the offer to the needs of young people and their availability.

Internships have been promoted at university job fairs, as well as through career offices and widely communicated on social media. We are constantly communicating through the careers website, where we have updated information for candidates interested in internships.

Other programmes and activities

We continue to implement our existing programmes and activities for young talent:

- ChallengING internship programme – a one-year programme, currently continuing in the area of IT – data science.
- ING's promotion in the academic community is based on the established Strategy for Cooperation with the Academic Community. The plan includes participation in events organised by the universities or by student organisations and research clubs operating at the universities. A major role in the implementation of these activities is played by our experts, who are in contact with universities from their regions and actively promote the ING employer brand and initiate interaction between universities and the bank.

International Talent Programme (ITP) – is a programme dedicated to graduates (holders of Bachelor's or Master's degrees) from universities with up to two years' professional experience and fluency in English. ITP offers participants the opportunity to take part in important projects for the Bank, numerous development activities, and internships abroad. We offer programme participants a training budget to acquire internationally recognised certifications, such as the CFA. Individuals in the ITP programme rotate between different teams in our Bank as part of their specialisation track for the first 18 months at ING. The programme aims at providing a variety of experiences and establishing professional relationships, with a view to participants finding a permanent position within the Bank that matches their expectations and aspirations. Individuals in the ITP programme have the opportunity to complete a secondment abroad for several months in one of the countries where ING operates. There are seven participants in the programme this year who are developing within the following specialisations: Risk, Wholesale Banking, Finance, Operations, Retail Client Division. This year, five 2023 graduates completed the programme and are continuing their careers within the ING Group.

Employee development and culture of continuous learning

In response to the challenges of changing client expectations, constant evolution in the labour market and rapid technological transformation, our response is a deeply rooted culture of continuous learning. It is a vision of the organisation as a living knowledge ecosystem in which every employee, regardless of role or position, has the opportunity, and the responsibility, to continuously improve, educate and develop. Supported by digital learning tools and a modern approach to training, it is becoming our driving force. By focusing on the education of our employees, we are building an organisation that is ready for the future.

In H1 2025, we delivered development activities in line with the strategic objectives:

- We are improving the learning experience – we have implemented an internal ING University training platform where employees can gain expertise through mandatory and optional training, learning materials or global academies. In the first three months of implementation, more than 4,000 users used the platform.
- We focus on digital learning – we have integrated the training platform with Udemy Business, where employees can strengthen their competences and expertise. The most popular courses are invariably those related to technology (AI, Cloud, Python) and the tools that support our operational effectiveness (PowerBI, SQL, Excel). Employees also learn languages through the eTutor app. We provide English, German, Spanish, Italian and Polish language lessons for foreigners. The Legimi app, a virtual library with 250,000 ebooks and audiobooks, is also very popular.
- We have integrated educational activities on artificial intelligence into one effective programme where employees can gain knowledge at 3 levels – Undestand, Apply, Create. Anyone can take a level test and join a webinar, workshop, conference or knowledge-sharing community of their choice.
- We provide processes like mentoring, skills sharing, coaching and career counselling that empower employees to grow. We are looking for new solutions to improve these processes and thus the employee experience. This year, as part of the mentoring programme, we expanded the pool of mentors, introduced an app to guide the pairing process, inter alia, and implemented 2 pathways for employees to develop – expert and leadership. We have a database of certified in-house coaches and career advisors. Additional developmental support is provided by skills sharing, which is also an intergenerational bridge. Its participants and attendees are experienced leaders and people from Generation Z. During the meetings, there is a mutual exchange of experience and knowledge.
- We build development programmes for designated organisational units or identified audiences, responding to strategic challenges in areas such as leadership among others. In April, we completed the second edition of 30under30. The objectives of the programme were to strengthen the self-confidence of young women in the financial sector, to raise awareness of the female participants' own talents and potential, and to develop their skills. The programme was completed by 21 participants from the CFO, CRO, CIO Divisions.
- We are refining our development offer to support individuals in leadership roles in the implementation of the Individual Development Plan, but we are also showing direction on what competences are relevant to our strategy and organisational culture. Leaders develop their skills towards inclusive leadership and identifying unconscious attitudes through facilitated discussions and workshops, among others. We continue with invitations to a specially designed Inclusive Leadership workshop, where they develop inclusive skills in an interactive way and learn how to mitigate the risks of discrimination and other exclusionary abuses. For the fifth year, we continue to participate in global leadership development programmes, where successive groups of people develop awareness and leadership skills at two levels: fundamentals and advanced. In June, we gave leaders the use of another simulation in a virtual environment (VR), this time focused on managing change, communicating it or working with resistance. We completed the first edition of ING Academy's Leadership with impact programme in March, it was a space to develop key skills, an opportunity to work with feedback and build collaborative visibility beyond your vertical. We are already working on the second edition. We have refreshed our approach to mentoring programmes and have completed recruitment for the spring edition of two programmes – one for those in leadership roles or aspiring to do so, the other for all ING employees. We are also in the midst of a Skills Sharing programme, where there is an exchange of knowledge and experience between leaders and the youngest of the GenZ generation. This is a unique platform to exchange perspectives.

Diversity and Inclusion

We are greatly encouraged by the increased interest in diversity and inclusion measures. This has been driven by employee networks, which have gained almost 200 followers since the beginning of the year. We are pleased that one in three people working at the bank follows the employee network. In April, the second conference of our employee network, ING Women, was also held. A total of 449 people took part in the event.

Celebrating Diversity Month is now a tradition for us. This year, in addition to numerous educational activities, we organised Diversity Days with the Diverse employee network, which we dedicated to neurodiversity. This time, the event took the form of an exhibition – but one that was more of an experience than an exhibition. Four zones were available to visitors: focus, teamwork, regeneration and sensory tranquillity. We are very pleased with the interest in the exhibition, which was visited by more than 500 people. This is the beginning of our discussions on neuro-exceptionalism and supporting diverse ways of thinking in the workplace.

On 10 June at the Finance of Tomorrow conference: Competitiveness, Diversity, Talent had its premiere with the Good Practice Guide for Equal Opportunities, Inclusion and Social Responsibility in the Banking Sector published by the Polish Bank Association. We are proud to have contributed to this guide, sharing our approach, practices and lessons learned from our daily work. As part of this initiative, we have also signed a commitment included in the guide, which clearly defines the direction in which we want to develop as a sector. This declaration is another step on our path towards transparency in diversity issues.

In the fifth edition of the Diversity IN Check, we were among the top fifteen employers most advanced in diversity management and inclusion in Poland. We are delighted that this is yet another year in which we have been recognised for our efforts and commitment to building an inclusive workplace. The Diversity IN Check award confirms that we are doing something right, but it also reminds us that real change requires continuity and commitment.

This year we celebrated Pride month together with employee networks supporting the LGBTQ+ community from around the world. During the two-day meeting, we talked about the importance of the employee network, psychological safety and good practice as a source of support for community members in other countries. Together with ING Hubs Poland, we also took part in the equality parade in Warsaw.

The second half of June brought us yet another reason to be proud. As ING Group, we achieved the highest ranking in Workplace Pride for the second year running. This confirms that our efforts to create an inclusive, open and safe working environment are noticed and appreciated.

WellbeING activities

Following on from the 2024 WellbeING principles, we are taking action to raise awareness and encourage employees to look after their health, their own mental, physical and financial wellbeing.

In the area of FINANCES:

- we provided employees with access to meetings and training that gave guidance on how best to take care of finances;
- we organised Finance Days, during which employees had the opportunity to attend meetings and listen to webinars on tax returns;
- meetings were held on retirement planning, as well as PIT2 training on tax settlements and consumer rights;
- we organised 2 meetings with a representative of Goldman Sachs TFI on saving for your future pension in the Employee Pension Scheme.

In the area of HEALTH:

- the year-long HEALTH DAY campaign is underway, during which all employees can enjoy massages. This year we have expanded the list of locations where these services are performed;
- we promote prevention campaigns, including:
  - the preventive health review that is a regular part of our private medical care offer,
  - subsidising vaccination against tick-borne encephalitis and continuing the HPV vaccination campaign for employees' children;
- in April, we held our annual Health Week event. This year, the focus was on the prevention of skin diseases, giving employees the opportunity to benefit from dermatoscopy examinations at the bank's head offices. Employees had the opportunity to meet with a dermatologist and discuss prevention of skin diseases. In addition, meetings were held on the topics of menopause and andropause. Throughout the month, employees had the opportunity to have examinations with an optometrist. Deepening their knowledge of viral hepatitis, employees had the opportunity to meet a specialist in this field. Employees can benefit from hepatitis A vaccination reimbursement for themselves and their families;
- we are continuing with the activities of the oncology prevention programme, under which employees:
  - have the opportunity to sign up for a colonoscopy, gastroscopy, breast ultrasound or mammography together with the examination package. As part of the programme, we cooperate with renowned centres in Poland. The tests are combined with specialist consultations and offer the possibility of detecting diseases at early stages,

- benefit from the Research Genes programme and the 2024-introduced programme for diseases of old age, including Alzheimer's disease,
- we held a Cancer Day meeting on people's reactions to cancer.

In the area of ENERGY:

- we organise activities around the mental health of employees, supported by the MINDGRAM Mental Health Platform. Employees benefit from a range of webinars, podcasts, relaxation sessions and, most importantly, one-to-one consultations with psychotherapists in various fields;
- we also support our leaders and help them recognise the symptoms of burnout and other emotional difficulties that can arise in employees. Leaders have the opportunity to attend workshops or individual consultations with a business coach;
- in addition, we organise themed mental health days, e.g. an anti-depression day, during which employees are given tips on how to support those affected and how to recognise the symptoms of mental illness.

In the area of ACTIVITY:

- we support employees in developing their sporting passions by organising sports tournaments. This year we have had a table tennis tournament and a football tournament. We've got "Run Warsaw" and "I'm Marching and Cheering" and a volleyball tournament coming up. The sports budget is very popular with employees, so that we can support them in the sports activities they undertake;
- through the Worksmile platform, employees are encouraged to engage in healthy competition and teamwork through participation in competitions, sports activities and through individual recording and tracking of activities undertaken. In June, we invited employees to join the BurnING Calories campaign;
- as part of Activity Week, employees had the opportunity to participate in themed events, meetings with a personal trainer, take part in yoga classes and have individual consultations with a physiotherapist.

Core changes to risk and equity management

As part of the H1 2025 Management Board Report on Operations, we present the major changes in risk and capital management that have taken place since the end of 2024. The risk and capital management system, the description of risk types and their quantification are described in detail in the Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group for 2024 in the chapter "Risk and capital management" (starting on p. 134).

Equity management

In H1 2025, we continued to work towards our capital management strategy. In the process of assessing the adequacy of internal capital in Q1 2025, we summarised another Risk Materiality Assessment Workshop. The Workshop did not modify the credit risk subcategories, i.e. a new subcategory was created: portfolio quality risk, which included the existing residual risk and the risk of a reduction in the economic value of the credit exposure due to a deterioration in the counterparty's ability to service the obligation, transferred from default and counterparty risk. The changes were made to organise the classification and did not change the materiality of the individual credit risk components. All of the listed credit risk components were and continue to be classified as permanently material. The materiality classification of other risks has not changed.

We currently identify 9 permanently material risks (default and counterparty risk, portfolio impairment risk, concentration risk, residual value risk, currency risk, general and specific interest rate risk in the trading book, interest rate risk in the bank book, liquidity and funding risk and operational risk) and 2 material risks (risk of other non-credit assets and macroeconomic risk).

As at 30 June 2025, the minimum capital requirements for the ING Bank Śląski S.A. Group are:

- The Common Equity Tier 1 (CET1) capital requirement is 8.01%,
- The Tier 1 (T1) requirement is 9.51%,
- The total capital ratio (TCR) requirement is 11.51%.

On 10 December 2024, the Polish Financial Supervisory Authority published its position on dividend policy in 2025. An amount of up to 50% of the profit for 2024 can only be paid out by banks that meet the following criteria at the same time:

- do not implement a recovery programme,
- are positively evaluated as part of the Supervisory Revision and Evaluation Process (final SREP score not worse than 2.5),
- have a leverage ratio (LR) of more than 5%,
- have a Common Equity Tier 1 (CET1) capital ratio of not less than the required minimum: 4.5% + 56.25% * P2R requirement + combined buffer requirement* + P2G**,
- have a Tier 1 (T1) capital ratio of not less than the required minimum: 6% + 75% * P2R requirement + combined buffer requirement + P2G,
- have a total capital ratio (TCR) of not less than the required minimum: 8% + P2R requirement + combined buffer requirement + P2G.

** Taking into account the announced countercyclical buffer target of 2%.*

***Pillar 2 Guidance or Additional Capital Recommendation – measures a bank's vulnerability to an adverse macroeconomic scenario using the results of supervisory stress tests. Sensitivity defined as: the relative change in CET1 calculated between the lowest level of CET1 in the scenario horizon and CET1 at the start of the test, including supervisory adjustments.*

An amount of up to 75% of the 2024 profit can only be paid out by banks that meet the criteria for a 50% payout and also whose portfolio of receivables from the non-financial sector has good credit quality (share of NPLs, including debt instruments, of no more than 5%).

We should meet the criteria set out above both at the standalone and consolidated level, as at 2024 year-end and on the date the General Meeting decides to pay dividends.

The maximum dividend payout level is limited to 75% in order to ensure the stability of the Polish financial sector by aligning the capital base of supervised entities with the level of risk they undertake and protecting financial service consumers.

Detailed information on dividends declared and paid can be found here.

Credit risk

Major changes in the Bank's lending policy

Loans to retail clients

Mortgage and consumer loan segment

- We performed a periodic update of the cost of living.
- We approved RAS internal limits for 2025 for the retail segments (including new limits on the share of loans with DSTI>60% and tenor 30 years in the new acquisition).
- We have approved a new monitoring strategy for the CLN and MTG portfolio under the EBA LOM PIAS initiative.

Mortgage loan segment

- We have implemented haircuts on transition and physical risk in property valuation (in the process of monitoring property values) – principles and data control.
- We validated the analyses and agreed on the principles of using price change indicators in the land and garage monitoring process.
- We have implemented the principle of market value determination in all property valuation processes (abandoning forced value determination in favour of prudential value taking into account risks).
- We have monitored clients with a high DSTI ratio and a low income buffer – a requirement of Recommendation S.
- Together with the business, we implemented stage 2 and 3 of the automated EasyHipo mortgage process.

Consumer credit segment

- We increased credit card limits for Premium clients.
- We have increased the limit on the maximum amount of a single loan in the MING channel for new clients of the bank.
- We launched BIK Overdebt in the Intermediaries channel.

Loans to entrepreneurs (sole proprietorships) within the corporate segment

- We performed a periodic update of the cost of living.
- We approved the RAS internal limits for 2025.
- We have introduced the new PKD 2025 classification (Polish Classification of Activities).
- We have changed the rules for lending to clients with longer business tenure, despite their short time with the bank.

Loans to corporate clients (excluding loans to entrepreneurs

- We have introduced a new PD model for Large Corporates.
- We have covered the third revenue property financing route (transactions > EUR 9 million) with a process dedicated to Business Banking clients. To date, such transactions have followed processes as for Wholesale Banking.
- We have further optimised the process of granting and managing ABL limits within the framework of the One Financing approach, i.e. a joint credit process for ING Bank Śląski, ING Lease and ING Commercial Finance, which ensures the best possible match between the offer and the clients' financial needs.
- We have updated the provisions of the Safeguards Manual to comply with the requirements of CRR3.
- We have made changes to the prefixes and rating classes at which financing and renewals can be granted in Easy Lending processes.

Stress tests

In accordance with the Stress Testing Policy, the ING Bank Śląski S.A. Group regularly conducts stress tests (scenario and sensitivity analyses) to assess the bank's resilience to negative scenarios. A report with the results of the stress tests is approved by the ALCO Committee and presented to the Management Board and Supervisory Board. At the same time, the project to redesign the stress testing framework is ongoing, with the aim of increasing flexibility and shortening the duration of the process.

Market risk

In the area of market risk, the objectives and activities presented in the 2024 Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group are continued. The bank manages risks in accordance with established principles, methodologies and approved policies. In H1 2025, known risks were confirmed through a risk identification workshop. Systematic reviews of internal regulations and documents are carried out at the bank, and control processes, reporting processes and risk modelling continue to be improved.

Liquidity and funding risk

In H1 2025, we continued our efforts to mitigate liquidity and funding risks – in line with the Liquidity and Funding Risk Management Policy, the Bank's strategy as well as regulatory requirements. As part of the semi-annual consolidated financial statements of the ING Bank Śląski S.A. Group for H1 2025, we present detailed information on the management of liquidity and funding risks that have taken place since the end of 2024. All monitored measures remain within limits. We perform systematic reviews of internal regulations and documents and continue to improve our reporting and modelling processes.

Model risk

In the area of model risk, the bank manages risks in accordance with developed principles, methodologies and approved internal policies and regulations. Model risk management activities include, but are not limited to: quarterly reporting of model risks, model validations and monitoring of model performance in accordance with approved plans. In H1 2025, the Bylaw of the Model Risk Committee, the Model Validation Policy and the regulations detailing it were updated, along with the alignment of the model validation process. In addition, an annual review of the materiality of the models was carried out, as a result of which the materiality of the models was verified and updated where appropriate.

Operational risk

In the area of operational risk, the bank manages risks in accordance with developed principles, methodologies and approved policies in line with legal requirements and regulatory guidelines.

In H1 2025, operational risk remained at an acceptable level and was continuously monitored using a number of indicators such as risk appetite limits and key risk indicators. The bank focused on risk mitigation, mainly in the area of external fraud, as well as IT and business continuity risks.

Following the completion of the implementation of the DORA Regulation, as of 17 January 2025, the bank implements the requirements in this respect as part of its ongoing operations. This mainly concerns incident reporting to the regulator and analysis of contracts and suppliers. In addition, the bank reported the information register to the regulator within the required timeframe.

In H1 2025, some of the 2nd Line of Defence's operational risk activities were reorganised, the organisational structure was adapted to the changing internal and external environment, the work of the Non-Financial Risk Committee was intensified, and risk guidelines were updated in areas such as physical security, business continuity, risk, IT or internal event management. The model for calculating the bank's risk level, based on data metrics, has also been partly revised and the change management guidelines and risk culture principles have been updated.

Further optimisation of the allocation of operational risk management tasks in the bank between the 1st and 2nd Line of Defence and the review and update of the non-financial risk management framework in the bank's subsidiaries remain ongoing.

Compliance risk

In H1 2025, we continued our efforts to ensure compliance with regulatory requirements, in particular the guidelines of the EBA, the PFSA and the GIIF. We have updated internal regulations on compliance risks, including personal data.

As in the previous year, we are improving controls in business processes, particularly in the areas of Know Your Client (KYC), money laundering prevention and data protection. We regularly build and strengthen the awareness of the bank's employees on issues of professional ethics and applicable regulations in the area of compliance, including personal data.

ESG risks

In H1 2025, we continued our ESG risk management activities.

- We have been working to improve the precision of the estimation of physical risk exposure for the bank's credit exposures.
- In H1 2025, the local liquidity stress tests included a climate factor in the stress scenario.
- In H1 2025, the ICAAP stress tests for credit risk included a climate factor in the stress scenario.
- We have implemented a methodology and carried out a materiality assessment of climate and environmental risks for compliance risks.
- We have implemented a methodology and carried out a materiality assessment of climate and environmental risks for operational risk.
- We have introduced an Inventory of impacts, risks and opportunities in the ESG area.
- We have implemented the Methodology for assessing the materiality of ESG impacts, risks and opportunities – IRO (DMA methodology – double materiality methodology).
- We carried out the bank's carbon footprint calculations under categories 13 and 15 of Scope 3.

Business risk

Macroeconomic risk

Macroeconomic risk is the risk due to macroeconomic factors and their impact on the levels of minimum capital requirements. The bank manages this risk through regular internal stress testing, which allows for ongoing monitoring of the sensitivity of the minimum capital requirements to macroeconomic factors. The last update of the macroeconomic risk requirement took place in H1 2025 and was based on the results of the ICAAP stress tests as at 31 December 2024. The instructions for calculating this capital were also updated at this time. The current approach incorporates all ICAAP scenarios, with capital requirements calculated based on the scenario that results in the highest requirement. This allows a wider range of risks to which the bank is exposed to be included in the calculations.

Information for investors

Shares and shareholders of ING Bank Śląski S.A.

Shareholding structure

ING Bank Śląski S.A. is a subsidiary company of ING Bank N.V., which as at 30 June 2025, held a 75% shareholding in the share capital of ING Bank Śląski S.A. and 75% of the total number of votes at the General Meeting – the figures that have not changed since March 2005. The remaining shares of our bank (25.0%) are in free float. They are held by institutions investors, especially Polish pension funds and national and foreign investment funds, and also individual investors. The largest of these at the end of June 2025 were:

- Allianz Polska Otwarty Fundusz Emerytalny S.A., which, according to the Semi-Annual Information on the Structure of Assets of Allianz Polska OFE S.A. as at 30 June 2025, held a 6.62% share in the share capital and total number of votes at the GM,
- Nationale Nederlanden Powszechne Towarzystwo Emerytalne S.A., which, according to the notification of 9 July 2025, held a 5.18% share in the share capital and total number of votes at the GM.

As at the date of the report, we are not aware of any other shareholder exceeding the threshold of 5% of our company's capital. During H1 2025 the value of share capital of ING Bank Śląski S.A. and the shareholding of its core shareholder in capital were not changed.

	Number of shares/Number of votes at GM		Share in the share capital and the total number of votes at the General Meeting	
Shareholder name	31 December 2024	30 June 2025	31 December 2024	30 June 2025
ING BankN.V. (a subsidiary of ING Groep N.V.)	97,575,000	97,575,000	75.00%	75.00%
Allianz Polska OFE S.A.*	9,512,036	8,612,036	7.31%	6.62%
Nationale Nederlanden PTE S.A. **		6,735,296		5.18%
Others	23,012,964	17,347,162	17.69%	13.20%
Total	130,100,000	130,100,000	100.00%	100.00%

** Based on semi-annual asset structure information of Allianz Polska Otwarty Fundusz Emerytalny S.A. as at 30 June 2025; ** based on notification from Nationale Nederlanden Powszechne Towarzystwo Emerytalne S.A. of 9 July 2025.*

Characteristics of the dominating shareholder

ING Bank N.V. belongs to the ING Group N.V. (ING Groep N.V.) – Europe's leading universal bank with a global reach, offering retail and corporate banking services to some 40 million clients in more than 100 countries. ING Group N.V. has more than 60,000 employees. ING Group N.V.'s products include savings accounts, payments, investments, loans and mortgage loans in the retail markets in which it operates. For the largest corporate clients (Wholesale Banking), ING Group N.V. provides specialised loans, tailored corporate financing, debt and equity-based solutions in securities markets, sustainable financing, payments and cash management, and trading and treasury services.

ING Group N.V. was established in 1991 as a result of a merger between the Dutch insurance company Nationale-Nederlanden and the national postal bank NMB Postbank. Over the years, ING Group N.V. has grown both organically and through mergers and acquisitions. After the global financial crisis of 2008-2009, the insurance business was sold and ING Group N.V. continued to operate as a European-focused retail bank and a global bank for the largest corporate clients (Wholesale Banking).

ING Groep NV is a public company listed on the stock exchange in Amsterdam (INGA NA, INGA.AS), Brussels and New York (ADR: ING US, ING.N). ING Groep N.V. has a diversified ownership structure. At the end of H1 2025, shareholders with a holding in excess of 3% (based on Dutch AFM filings) were BlackRock Inc. and Capital Research and Management Company.

More information on the dominant shareholder is available at https://www.ing.com/Home.htm.

Shares and share capital

In accordance with its Charter, the share capital of ING Bank Śląski S.A. is split into 130,100,000 shares with the nominal value of PLN 1 each share. All the shares issued by the Bank are ordinary bearer shares. No special control rights are attached to the bank shares. The Charter of ING Bank Śląski does not provide for any restrictions as to transfer of title to the shares issued by the bank, exercising voting rights and contains no provisions according to which equity rights related to securities are separate from holdings of securities.

Additionally, the Charter authorises the Management Board to increase the share capital but maximum PLN 26 million (or issues of maximum 26 million shares) by 26 April 2026 (authorised capital) and to waive pre-emption rights at share issues of the authorised capital. The decisions taken by the Management Board on the share issue price and waiver of pre-emption rights require approval by the Supervisory Board. The authorisation to issue the target capital will enable the Management Board to take, if necessary, quick actions aimed at the capital strengthening of the bank. The full justification in this regard was attached to the draft resolution of the General Meeting on this matter (p. 19 of this document).

Share price

In H1 2025, the price of ING Bank Śląski shares on the WSE fluctuated from PLN 243.5 to PLN 340.0. On 30 June 2025, our bank's share price stood at PLN 311.5 at the close of trading, 29.0% higher than on the last trading day of 2024 (the dynamic excludes the dividend payment, which took place on 12 May 2025, a dividend yield of 8.5%). For comparison, the WIG-banks sector index grew by 33.1% at that time.

Our bank has been part of the WIG and mWIG40 indices since their inception.

Participation in the main stock indices of ING Bank Śląski SA (based on the last revision in a given year)

	2021	2022	2023	2024	H1 2025
WIG	2.3694%	1.8698%	2.065%	1.9371%	1.940%
mWIG40	9.9999%	8.6946%	9.995%	9.1380%	9.293%

As at the end of June 2025, the market value of our bank was PLN 40.5 billion, while the book value of the bank's capital group was PLN 17.6 billion.

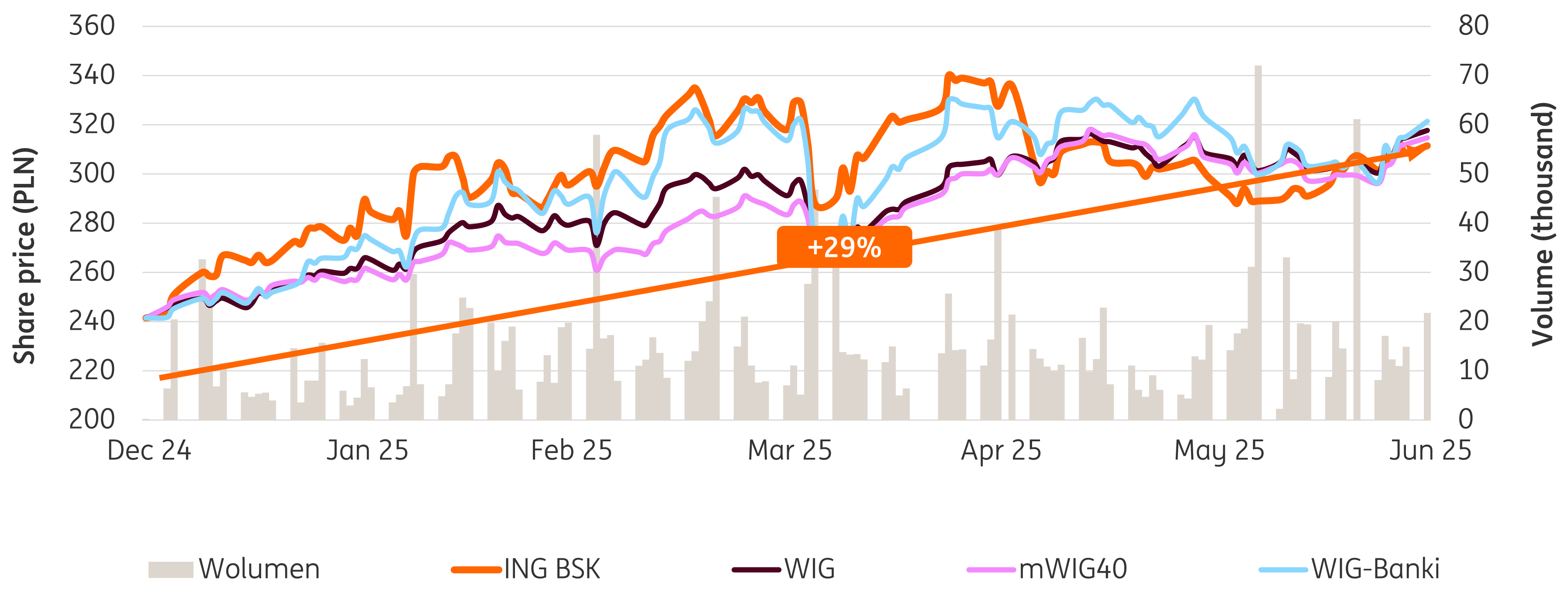
ING Bank Śląski S.A. shares data

	2021	2022	2023	2024	H1 2025
Share price as at the end of the period (PLN)	267.0	164.8	256.0	241.5	311.5
Top share price (PLN)	282.0	287.0	275.5	357.5	341.0
Bottom share price (PLN)	167.2	130.0	151.6	223.5	238.5
Turnover weighted average *spread* (basis points)	43	50	41	39	36
Yearend capitalisation (PLN billion)	34.7	21.4	33.3	31.4	40.5
Number of shares (thousands)	130,100	130,100	130,100	130,100	130,100
Total number of transactions	60,865	63,709	68,759	119,544	86,986
Number of block trades	2	1	0	18	6
Average number of transactions per session	242	254	275	480	707
Trading volume	2,404,219	2,203,660	2,840,678	3,354,489	1,860,695
Average trading volume per session	9,579	8,780	11,363	13,472	15,128
Market makers' share in turnover	8.78%	8.39%	9.23%	7.58%	12.01%
Dealers' share in turnover	2.50%	0.61%	0.99%	1.83%	0.13%
Earnings per share in PLN	17.7	13.2	34.1	33.6	35.0
Share book value (PLN)	104.0	71.8	128.6	132.0	135.4
Dividend per share* (PLN)	5.10	5.30	0.00	33.35	25.18
P/E ratio**	15.0	12.5	7.5	7.2	8.9
C/WK** ratio	2.6	2.3	2.0	1.8	2.3

** Paid in the year; **index calculated based on the share price at the end of the given year / half-year in question.*

Our Bank's shares are under the number ISIN PLBSK0000017. The ticker on the WSE market is "ING", and information about our bank on Bloomberg and Reuters is available under "ING PW" and "INGP.WA", respectively.

ING Bank Śląski S.A. share quotations in H1 2025 versus comparable selected WSE indexes



ING Bank Śląski ratings

Confirmation of our stable financial position and very good sustainability performance is provided by external credit and ESG ratings. Our bank works with three rating agencies:

- on credit ratings:
  - Fitch Ratings and
  - Moody's Investors Service,
- in terms of ESG ratings from Sustainable Fitch.

The history of the changes in credit ratings assigned by the two agencies can be found on our website.

Fitch Ratings Ltd.

Fitch Ratings agency (Fitch Ratings Ireland Limited with its seat in Dublin) assigns a full rating under the agreement between our bank and the agency. As at the date of signing of the 2025 semi-annual management report, the rating assigned to our Bank from the Agency is as follows:

Fitch Ratings Ltd.	
Long-Term IDR	A+
Outlook for sustaining the rating	Stable
Short-Term IDR	F1+
Viability Rating (VR)	bbb+
Shareholder Support Rating	a+
National Long-Term Rating	AAA (pol)
Outlook for sustaining the above rating	Stable
National Short-Term Rating	F1+ (pol)

In an announcement published by Fitch Ratings on 30 June 2025, as part of its annual review, the agency upgraded ING Bank Śląski's Viability Rating to 'bbb+' from 'bbb' and affirmed its long-term credit rating at 'A+' with a stable outlook. The agency indicated that the VR increase primarily reflects an improved assessment of the operating environment of the banking sector in Poland and takes into account the bank's strengthened business profile, based on sustained high profitability, good asset quality and an adequate level of capitalisation.

Moody's Investors Service Ltd.

Moody's Investors Service (Moody's Investors Service Cyprus Ltd.) assigns their rating to our bank on the basis of public information. As at the date of signing of the semi-annual management report for 2025, the Bank's rating from the Agency is as follows:

Moody's Investors Service Ltd.	
LT Rating	A2
ST Rating	P-1
Baseline Credit Assessment (BCA)	baa2
Adjusted BCA	baa1
Rating Outlook	Stable
Long-term/ short-term CR Assessment	A1 (cr) / P-1 (cr)
CR Rating	A1 / P-1

In the press releases published on 04 March 2025, the agency sustained the ratings assigned to the bank. In it, she stressed that the bank's rating reflects the bank's good capitalisation and profitability, which provide sufficient risk absorption buffers and a stable funding profile.

Sustainable Fitch Ltd.

In 2022, our bank started working with Sustainable Fitch Agency (Sustainable Fitch Limited, based in London).

In an announcement published by Sustainable Fitch Limited on 01 July 2025, as part of its annual review, the agency sustained the ESG rating for ING Bank Śląski at "2" on a five-point scale, with "1" being the best rating and "5" being the worst. The rating reflects the bank's strong commitment to sustainability, including in particular its decarbonisation and climate impact transformation plan, and the integration of environmental and social criteria and corporate governance principles into its operations, strategy and management. The confirmation of the "2" rating demonstrates the bank's stable position among financial institutions striving for sustainable growth.

ING Bank Hipoteczny ratings

Moody's Investors Service Ltd.

Moody's Investors Service assesses the risk of both ING Bank Hipoteczny S.A. and mortgage bonds issued by the bank under an agreement between the bank and the agency. As at the date of signing this report, the rating of ING Bank Hipoteczny S.A. was as follows:

Moody's Investors Service Ltd.	
Rating of covered bonds	Aa1
Long-term rating (LT Issuer Ratings)	A3
Short-term rating (ST Issuer Ratings)	P-2
Long-term counterparty risk rating (LT Counterparty Risk)	A1
Short-term counterparty risk rating (ST Counterparty Risk)	P-1
Rating Outlook	Stable
Long-term/ short-term CR Assessment	A1 (cr) / P-1 (cr)

The agency stresses that the rating assigned to ING Bank Hipoteczny reflects:

- 100% ownership of ING Bank Śląski and its stable growth prospects,
- the significant strategic importance of the bank and its operational integration within the structures of the ING Bank Śląski S.A. Group,

a commitment from ING Bank Śląski S.A. to support the capital and liquidity position of ING Bank Hipoteczny S.A. in order to meet regulatory requirements.

Changes to statutory bodies

Supervisory Board

H1 2025 saw no changes made to the composition of the Supervisory Board or the Board Committees. The existing composition of the Board was retained, for which – in accordance with the bank's practice in this respect – the Ordinary General Meeting adopted a suitability assessment on 29 April 2025 (Resolution No. 29 of the Ordinary General Meeting on the assessment of the fulfilment of the requirements referred to in Article 22aa of the Banking Law Act (suitability assessment) by the existing members of the Supervisory Board). The assessment of the individual and collective suitability of the members of the Supervisory Board was adopted by the General Meeting as recommended by the Remuneration and Nomination Committee on 27 March 2025.

Thus, the composition of the Supervisory Board and the Board Committees as at 30 June 2025 was as follows:

Composition of the Supervisory Board as at 30 June 2025				
Member of the Supervisory Board	Function in the Supervisory Board	Audit Committee	Remuneration and Appointment Committee	Risk Committee
Ms Monika Marcinkowska	Chair, Independent Member	●	●	●
Ms Małgorzata Kołakowska	First Deputy Chair		●	●
Mr Michał Szczurek	Deputy Chair		●	

Mr Stephen Creese	Member			Member
Ms Dorota Dobija	Independent Member	Member	Member	Chair
Ms Aneta Hryckiewicz-Gontarczyk	Independent Member		Chair	Member
Mr Arkadiusz Krasowski	Independent Member	Chair		Member
Mr Hans de Munck	Member	Member		
Mr Serge Offers	Member	Member		

● – Chair ● – Member

On 27 June 2025, Mr Stephen Creese resigned as a member of the Bank Supervisory Board with effect from 31 August 2025. The reason for the resignation is his plan to leave the ING Group.

Bank Management Board

H1 2025 saw the following changes to the composition of the Bank Management Board in consequence of expiry of the term of office of the Bank Management Board which started in 2020.

As of the date of the General Meeting approving the financial statements for 2024, i.e. 29 April 2025, the term of office of the Bank Management Board ended and thus Mr Brunon Bartkiewicz's mandate as President of the Bank Management Board expired. The mandate of Mr Sławomir Soszyński, who resigned on 29 November 2024 to seek election to the Bank Management Board for the next term, also expired.

At the same time, on 29 April 2025, pursuant to a resolution of the Supervisory Board of 3 September 2024 and with the approval of the Polish Financial Supervision Authority of 20 December 2024, Mr Michał Bolesławski assumed the position of President of the Bank Management Board. Also on 29 April 2025, the Supervisory Board, on the basis of a positive recommendation of the Remuneration and Nomination Committee, approved the individual and collective assessment of the suitability of the candidates for the Bank Management Board and thus appointed the following Bank Management Board for the new term: Ms Joanna Erdman – Vice-President of the Management Board of the Bank, Mr Marcin Giżycki – Vice-President of the Management Board of the Bank, Ms Bożena Graczyk – Vice-President of the Management Board of the Bank, Mr Marcin Kościński – Vice-President of the Management Board of the Bank, Mr Michał H. Mrożek – Vice-President of the Management Board of the Bank, Mr Maciej Ogórkiewicz – Vice-President of the Management Board of the Bank and Ms Alicja Żyła – Vice-President of the Management Board of the Bank.

In addition, the Supervisory Board resolved to appoint Ms Ewa Łuniewska to the Management Board of the Bank for a new term of office, effective from the date of entry in the Register of Entrepreneurs of the National Court Register of the amendment to Article 26 section 1 of the Charter of ING Bank Śląski Spółka Akcyjna (concerning the number of members of the Management Board of the Bank), covered by Resolution No. 28 of the Ordinary General Meeting of 29 April 2025. As agreed with Ms Ewa Łuniewska, she will serve as Vice-President of the Management Board until 31 December 2025.

Ms Joanna Erdman, Mr Marcin Giżycki, Ms Bożena Graczyk, Ms Ewa Łuniewska, Mr Michał H. Mrożek and Ms Alicja Żyła all served on the Board in the previous term.

The composition of the Bank Management Board and responsibilities of members of the Management Board as of 29 April 2025 were as follows:

Composition and responsibilities of the Management Board since 29 April 2025

Management board member	Responsibility area
Mr. Michał Bolesławski	**President of the Bank Management Board**, supervising the CEO Division
Ms Joanna Erdman	**Vice-President of the Bank Management Board**, supervising the CRO Division
Mr Marcin Giżycki	**Vice-President of the Bank Management Board** overseeing the Individual Client Division, the Private Banking and Investment Client Division, including the Brokerage Office, and supervising the subsidiary, Nowe Usługi S.A.
Ms Bożena Graczyk	**Vice-President of the Bank Management Board** overseeing the CFO Division and a subsidiary – ING Bank Hipoteczny S.A.
Mr Marcin Kościński	**Vice-President of the Bank Management Board** supervising the Business Client Division and the following subsidiaries: ING Usługi dla Biznesu S.A. and ING Investment Holding (Polska) S.A.,
Mr Michał H. Mrożek	**Vice-President of the Bank Management Board**, supervising the Wholesale Banking Division
Mr Maciej Ogórkiewicz	**Vice-President of the Bank Management Board**, supervising the CIO Division
Ms Alicja Żyła	**Vice-President of the Bank Management Board** supervising the COO Division and supervising a subsidiary – SAIO S.A.

At the same time, in connection with the registration on 9 May 2025 in the National Court Register of the amendment to Article 26(1) of the Bank Charter regarding the number of members of the Management Board in a nine-member composition, the function of Vice-President of the Management Board was assumed by Ms Ewa Łuniewska.

As a result, the composition of the Bank Management Board and responsibilities of members of the Management Board as of 9 May 2025 were as follows:

Composition and responsibilities of the Management Board since 9 May 2025

Management board member	Responsibility area
Mr. Michał Bolesławski	**President of the Bank Management Board**, supervising the CEO Division
Ms Joanna Erdman	**Vice-President of the Bank Management Board**, supervising the CRO Division
Mr Marcin Giżycki	**Vice-President of the Bank Management Board** supervising the Individual Client Division and a subsidiary – Nowe Usługi S.A.
Ms Bożena Graczyk	**Vice-President of the Bank Management Board** overseeing the CFO Division and a subsidiary – ING Bank Hipoteczny S.A.
Mr Marcin Kościński	**Vice-President of the Bank Management Board** supervising the Business Client Division and the following subsidiaries: ING Usługi dla Biznesu S.A. and ING Investment Holding (Polska) S.A.,
Ms Ewa Łuniewska	**Vice-President of the Bank Management Board**, supervising the Private Banking and Investment Client Division, including the Brokerage Office
Mr Michał H. Mrożek	**Vice-President of the Bank Management Board**, supervising the Wholesale Banking Division
Mr Maciej Ogórkiewicz	**Vice-President of the Bank Management Board**, supervising the CIO Division
Ms Alicja Żyła	**Vice-President of the Bank Management Board** supervising the COO Division and supervising a subsidiary – SAIO S.A.

Remuneration of the Management Board and the Supervisory Board members

Remuneration due to members of the Management Board of ING Bank Śląski S.A. (PLN million)

Period	Remuneration	Other benefits*	Total
H1 2024	6.8	1.3	8.1
H1 2025	7.6	2.0	9.6

** Other benefits, inter alia, include insurance, deposits to an investment fund, medical care and other benefits approved by the bank Supervisory Board.*

The benefits for 2025 for the members of the Management Board of ING Bank Śląski under the Variable Compensation Scheme have not yet been awarded.

In keeping with our Bank's remuneration system, the Bank Management Board members may be entitled to a 2025 bonus to be disbursed in 2026–2033. Accordingly, a provision was set up for the payment of the 2025 bonus for the Management Board members, which as at 30 June 2025 stood at PLN 5.5 million. The final decision on the amount of this bonus will be taken by the Bank Supervisory Board;

Remuneration paid to members of the Management Board of ING Bank Śląski S.A. (PLN million)

Period	Remuneration	Awards*	Other benefits**	Total
H1 2024	6.8	7.6	1.3	15.7
H1 2025	7.6	6.2	2.0	15.8

**The bonus for H1 2025 covers the following components: 1) Bonus resulting from the Variable Compensation Plan: for 2024 non-deferred cash, for 2023 1st tranche deferred cash, for 2022 2nd tranche deferred cash, for 2021 3rd tranche deferred cash, for 2020 3rd tranche deferred cash, for 2019 4th tranche deferred cash and for 2018 5th tranche deferred cash; 2) Phantom Shares resulting from the Variable Compensation Plan: for 2022 1st tranche deferred, for 2021 2nd tranche deferred, for 2020 2nd tranche deferred, for 2019 3rd tranche deferred, for 2018 4th tranche deferred and for 2017 5th tranche deferred.*

**The bonus for H1 2024 covers the following components: 1) Bonus resulting from the Variable Compensation Plan: for 2023 cash not deferred, for 2022 cash 1st tranche deferred, for 2021 cash 2nd tranche deferred, for 2020 cash 2nd tranche deferred, for 2019 cash 3rd tranche deferred, for 2018 cash 4th tranche deferred and for 2017 cash 5th tranche deferred; 2) Phantom Shares resulting from the Variable Compensation Plan: for 2022 held, for 2021 1st tranche deferred, for 2020 1st tranche deferred, for 2019 2nd tranche deferred, for 2018 3rd tranche deferred and for 2017 4th tranche deferred.*

***Other benefits, inter alia, include insurance, deposits to an investment fund, medical care and other benefits approved by the bank Supervisory Board.*

In H1 2025 the total amount of remuneration due and disbursed by ING Bank Śląski S.A. to members of the Supervisory Board was PLN 0.8 million.

Remuneration of members of the Supervisory Board of ING Bank Śląski S.A. (PLN million)			
Period	Remuneration	Bonus and other benefits	Total
H1 2024	0.6	0.0	0.6
H1 2025	0.8	0.0	0.8

As part of the Incentive Scheme addressed to people with a significant impact on the Bank's risk profile, the Bank awards treasury shares free of charge as a component of variable remuneration. As at 30 June 2025, the members of the Bank Management Board held a total of 21,149 shares, consisting of:

- non-deferred treasury shares for the period from 1 July to 31 December 2022 (4,725 shares),
- the first part of the deferred shares for the period from 1 July to 31 December 2022 (751 shares),
- the second part of the deferred shares for the period from 1 July to 31 December 2022 (805 shares),
- non-deferred shares for the period from 1 January to 31 December 2023 (6,625 shares),
- the first part of the deferred shares for the period from 1 January to 31 December 2023 (1,641 shares),
- non-deferred shares for the period from 1 January to 31 December 2024 (6,602 shares).

Bank share-based incentive scheme

In 2022, an incentive scheme was established at the Bank aimed at persons with a significant influence on the Bank's risk profile, under which treasury shares are awarded free of charge as a component of variable remuneration within the meaning of the Regulation of the Minister of Finance, Funds and Regional Policy.

In December 2024 and March 2025, we completed the repurchase of the 4th and 5th tranches of treasury shares, acquiring 47,726 shares for a total amount of PLN 13.7 million, representing approx. 0.03669% of the share capital and approx. 0.03669% in the total number of votes at our General Meeting. We reported on the completion of the repurchase of both the 4th and 5th tranches with our current reports numbered 36/2024 (including the appendix) and 8/2025 (including the appendix), respectively.

The 4th and 5th tranches of shares acquired represent the second part of the deferred financial instruments granted for the period from 1 July to 31 December 2022, the first part of the deferred financial instruments granted for the period from 1 January to 31 December 2023 and the non-deferred part of the financial instruments for the period from 1 January to 31 December 2024. The shares are subject to a holding period of one year from the date of grant – in the case of members of the Management Board, transactions in the acquired shares may take place after 20 March 2026, and in the case of other Identified Staff after 18 March 2026 (in the case of employees of the bank) or after 31 March 2026 (in the case of employees of the bank's subsidiaries).

The tables below present information on the number of shares granted in our Bank to members of the Management Board in 2025. We also reported on the acquisition of shares by members of the Management Board in our current reports numbered 6/2025 (with appendix) and 10/2025 (with appendix).

Ownership of bank shares by members of the Management Board as at 30 June 2025 – as allocated in 2025	
Management board member	Number of shares
Ms Joanna Erdman	1,443
Mr Marcin Giżycki	1,569
Ms Bożena Graczyk	1,565
Mr Marcin Kościński	713
Ms Ewa Łuniewska	1,272
Mr Michał H. Mrożek	1,272
Mr Maciej Ogórkiewicz	13
Ms Alicja Żyła	1,201
Total	**9,048**

Independence of Supervisory Board Members and Board Committees

According to Article 19(3) of the Bank's Charter, , the composition of the Supervisory Board includes minimum two independent members who are free of any relations with the Bank, its shareholders or employees, that could materially affect the ability of such member to take impartial decisions – independent members. In addition, Article 22(6) of the Bank's Charter provides that the criteria of independence should be met by the majority of members of the Board Committees, i.e. the Audit Committee, the Remuneration and Nomination Committee and the Risk Committee, including the chairmen of these Committees. In accordance with the above provisions, reflected in the Supervisory Board Bylaw (Article 3(4)), there are four independent members of the Bank Supervisory Board who are free from any relationship with the Bank and ING Group. Independent members furthermore form the majority of the Board Committees and serve as chairs of the Remuneration and Nomination Committee, the Risk Committee and the Audit Committee.

These are:

- Ms Monika Marcinkowska, President of the Supervisory Board,
- Ms Dorota Dobija, Chair of the Supervisory Board, Chair of the Risk Committee,
- Ms Monika Marcinkowska, Member of the Supervisory Board, Chair of the Audit Committee,
- Ms Aneta Hryckiewicz-Gontarczyk, Member of the Supervisory Board, Chair of the Remuneration and Nomination Committee.

The criteria for the independence of independent members derive from the law, inter alia, and the Best Practice for WSE Listed Companies adopted by the Bank, and are described in detail in the Supervisory Board Bylaw (Article 3(5)).

Internal Audit

Also our Bank has an independent internal audit unit with the task of reviews and assessment – in an independent and objective manner – the adequacy and effectiveness of the risk management system and the internal control system, with the exception of the internal audit unit. The independence of the audit unit from other units of the Bank is ensured, inter alia, by the direct contact of the head of the audit unit with members of the Bank Management Board, Audit Committee, Supervisory Board and the auditor on matters requiring their attention and by the fact that the appointment and dismissal of the head of the audit unit is subject to the approval of the Supervisory Board, after recommendation by the Audit Committee.

Diversity policy for supervisory, managing and administrative bodies

ING Bank Śląski has a *Diversity Policy for ING Bank Śląski S.A Management Board and Supervisory Board Members* in place. The Policy seeks to:

- reach a broad spectrum of competence when appointing Supervisory Board and Management Board members so as to have diverse points of view and experience and to facilitate independent opinions and take reasonable decisions to be issued by a given body,
- ensure the high quality of tasks performed by managing bodies by way of selecting competent individuals to the Supervisory Board and Management Board, primarily applying objective business-related criteria and taking into account benefits stemming from diversity.

As regards business-related criteria, the diversity strategy ensures selection of persons with diverse knowledge, skills and experience, suitable for positions held by them and duties entrusted to them, who complement each other at the level of the Management Board and Supervisory Board. The criteria are verified in the suitability assessment process described in the *Policy for the Assessment of the Suitability of the Members of the Supervisory Board, Management Board and Key Function Holders at ING Bank Śląski S.A.* Moreover, apart from knowledge, competences and professional experience, the diversity policy covers gender- and age-related differences, and applies them to arrive at the best outcome. In making its decision when appointing members to the governing bodies, the bank takes into account that more diverse governing bodies foster constructive dissent and discussion based on different points of view.

The policy assumes aiming at ensuring representation of both genders in the processes of selection and succession plans, keeping in mind the laws on fair treatment while establishing employment relationship. The Remuneration and Nomination Committee of the Supervisory Board of ING Bank Śląski S.A. sets a target value for the representation of the underrepresented gender on the Management Board and Supervisory Board of the Bank and adopts a plan to achieve the target value. The target value is determined according to the term of office of the

Supervisory Board and the Management Board of the Bank, i.e. once every four consecutive full financial years counted from the beginning of the term of office of a given body.

Since the implementation of the policy in 2018, the target for under-represented gender has been set at 30% women and 70% men.

Following the creation of a new Division in the Bank's organisational structure in April 2025, the composition of the Bank Management Board has expanded (currently nine members). At the end of H1 2025, the Management Board comprised 4 women out of 9 members (44% of the number of Management Board members) and the Supervisory Board comprised 4 women out of 9 members (44% of the number of Supervisory Board members).

Supplementary information

Position of the Management Board on the feasibility of the previously published forecasts

The Bank has not published its projected financial performance for 2025.

Proceedings before the President of the Office of Competition and Consumer Protection (OCCP)

Detailed information on proceedings pending before the UOKiK is included in the Consolidated semi-annual report of ING Bank Śląski S.A. Group for H1 2025.

Legal risks of the Swiss franc-indexed mortgage portfolio

Information on the legal risk of the Swiss franc-indexed mortgage loan portfolio is presented in the Consolidated semi-annual report of ING Bank Śląski S.A. Group for H1 2025. The information contained therein relates, inter alia, to the value of the subject matter of the litigation and the provisions established, the number of litigation cases and the ongoing programme of settlements with clients.

Major events in H1 2025

A list and description of core events in H1 2025 can be found in item 2 of the Consolidated semi-annual report of ING Bank Śląski S.A. Group for H1 2025.

Contingent commitments granted

ING Bank Śląski and its subsidiaries provide sureties to loans and guarantees as part of its statutory activity. The value of off-balance-sheet financial liabilities granted at the end of H1 2025 was PLN 1,667.2 billion.

Off-balance liabilities of the ING Bank Śląski S.A. Group

PLN billion	Q1 2024	Q2 2024	Q3 2024	Q4 2024	Q1 2025	Q2 2025
Contingent liabilities granted	54.7	53.4	55.3	54.5	55.0	57.2
unused credit lines	43.5	42.0	42.5	42.5	43.0	45.0
guarantees	7.8	8.0	9.2	8.0	8.3	8.5
undrawn overdrafts in current account	1.4	1.4	1.4	1.4	1.3	1.3
credit card limits	1.7	1.8	1.8	1.9	2.0	2.0
letters of credit	0.3	0.3	0.2	0.4	0.4	0.4
reverse repo	-	-	0.1	0.3	0.1	0.0
Contingent liabilities received	20.7	22.7	22.5	26.2	26.0	26.2
Off-balance-sheet financial instruments	1,509.2	1,498.1	1,556.7	1,552.7	1,496.7	1,584.5
Total off-balance items	**1,584.6**	**1,574.2**	**1,634.5**	**1,633.4**	**1,577.7**	**1,667.9**

Detailed information on off-balance sheet liabilities is included in the Consolidated semi-annual report of ING Bank Śląski S.A. Group for H1 2025.

Changes in the banking sector regulations

Changes in the banking sector regulations		
Name	**Effective date**	**Description**
Act of 6 November 2024 on compensatory taxation of component units of international and national groups	1 January 2025	The Act implemented into the Polish legal order the provisions of Council Directive (EU) 2022/2523 of 14 December 2022 on ensuring the global minimum level of taxation of multinational enterprise groups and large domestic groups in the European Union (Journal of Laws of EU L 328 of 22.12.2022, p. 1), also referred to as a top-up tax. The new rules applied to constituent entities of a multinational group or a national group if, in at least two of the four tax years immediately preceding the tax year, they had group revenue (as shown in the group's consolidated accounts) of at least EUR 750 million. The equalisation tax is a new type of taxation (a new tax in the sense of the Tax Ordinance) that aims to ensure that the income of the constituent entities of international and domestic groups is taxed at least at a minimum rate of 15 per cent in each jurisdiction in which they operate. This is in response to the challenges of tax optimisation and shifting profits to low-tax jurisdictions. This law introduced 3 main types of compensatory taxes: Global Income Inclusion Rule (IIR), a tax levied on the ultimate parent company in a group, which will be liable to pay the relevant compensation tax if its low-taxed subsidiaries in other jurisdictions do not achieve the minimum effective tax rate. Qualified Domestic Minimum Top-up Tax (QDMTT), unlike IIR, the right to collect this tax stays in the state where the low-taxed component units of the group are located. This tax is designed to ensure that income generated in Poland is taxed at a minimum level, even if the parent company is located in another country. Undertaxed Payments Rule (UTPR), a tax imposed on group entities located in a jurisdiction when the parent company operates in a country that has not implemented the IIR rules. In such cases, Polish entities will be required to pay a top-up tax. The introduction of the regulation made it necessary for Polish companies that are part of international capital groups to adapt to the new regulations. In the event that the effective tax rate calculated according to the standards of these regulations is less than 15%, companies will be required to pay a national or global top-up tax. Global tax calculations will be based on specific provisions introduced by the Act. Due to differences in the tax systems of countries obliged to implement the global tax principles, tax calculations for the purposes of compensatory taxation will, in principle, be based on data resulting from the accounts (with appropriate adjustments).
Act of 19 November 2024 amending the Act on Agricultural Tax, the Act on Local Taxes and Fees and the Act on Stamp Duty	1 January 2025	The amendment introduced changes to the property tax, among other things necessitated by the implementation of the Constitutional Court's judgment of 4 July 2023, ref. SK 14/21. The changes in this respect include the introduction of new legal definitions of the terms building, structure, construction work, permanent connection to the ground, and the residential part of a residential building, as well as the introduction of appendix 4 to the Act, which contains categories of objects that are constructions.

Regulation of the Minister of Finance of 16 August 2024 on additional data to be added to the accounts to be submitted under the Corporate Income Tax Act	1 January 2025	From 1 January 2025, the largest CIT taxpayers have been obliged to keep their accounts exclusively in electronic form and to send the JPK_KR_PD and JPK_ST structure (collectively as "**JPK-CIT**") to the tax authorities on an annual basis. JPK, or the Single Control File, is an electronic document containing a collection of taxpayers' data that contains information on the economic operations of a specific period of the fiscal year. Its purpose is to facilitate the monitoring, analysis and detection of tax irregularities. JPK-CIT is a new way to send ledger data in an xml data schema. With JPK CIT files, their structure will be based on the JPK_KR structure adapted to the specifics of corporate income tax payers.
Act of 6 December 2024 amending the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision and certain other acts	1 January 2025	The law is related to the implementation of the (EU) Directive 2022/2464 (CSRD). The provisions of the Act relate to the imposition of new sustainability reporting obligations, the attestation of such reports by auditors, and the obligations of audit committees in this regard. For large entities (such as a Bank), reporting under the new rules for the first time occurred for 2024 (report published in 2025).
Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the minimum capital threshold	09 July 2024 / 01 January 2025	The CRR3 Regulation is part of a package of legislation that implements elements of the Basel III regulatory reforms into EU law. CRR3 introduces changes to the rules on capital requirements in all areas of risk. The changes concern, inter alia, the minimum capital threshold, credit, market and operational risks, as well as ESG risks.
Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024 amending Directive 2013/36/EU as regards supervisory powers, sanctions, third-country branches and environmental, social and corporate governance risks	11 January 2026 (requires implementation into national law)	CRD6 aims to further harmonise the framework for banking supervision. Changes related to supervision include, inter alia, the grounds for withdrawal of authorisation, the obligations of banks in relation to the acquisition or disposal of a material holding, the transfer of assets and liabilities of material value and mergers and demergers, the involvement of the supervisor in the assessment of the suitability of all members of the management board and the chair of the supervisory board, and the sanctions applied (including the power to impose periodic fines) and other supervisory measures. The directive also includes changes to the risk management and internal control system, including reference to the management of ESG risk, as well as the risk of exposure to cryptocurrency.
Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on operational digital resilience in the financial sector and amending Regulations (EC) No 1060/2009, (EU) No 648/2012, (EU) No 600/2014, (EU) No 909/2014 and (EU) 2016/1011	17 January 2025	A new regulation (known as DORA) sets out requirements for financial entities in relation to the management of risks associated with the use of information and communication technologies (ICTs), including the reporting of serious ICT-related incidents and the testing of operational digital resilience. DORA also contains provisions on agreements entered into by financial entities with external ICT service providers and rules on the establishment and operation of a framework for the supervision of key external ICT service providers providing services to financial entities.
Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 on laying down harmonised rules on artificial intelligence (Artificial Intelligence Act)	2 February 2025 / 2 August 2026	The new regulations set out the obligations of providers and users of AI-based systems. The extent of the requirements depends on the level of risk represented by the system in question. Among others, systems for credit assessment, as well as employee recruitment and management, were classified as high-risk systems. The regulation also identifies prohibited AI practices.
Act of 4 April 2025 amending the Act – Tax Ordinance and certain other acts	01 May 2025	The Act implemented the CJEU judgment (C-322/22) by amending the Tax Ordinance by establishing a regulation according to which interest on a tax overpayment arising as a result of a decision of the Constitutional Tribunal or a decision of the Court of Justice of the European Union is due from the date on which the overpayment arose until the date on which it is repaid, irrespective of the timing of the application in this regard.

Act of 26 April 2024 on ensuring that economic operators meet the accessibility requirements of certain products and services	28 June 2025	The Act sets out the accessibility requirements for products and services and the related obligations of economic operators. The provisions of the Act apply, inter alia, to products such as payment terminals, ATMs and deposit machines, as well as services such as retail banking. The requirements of the Act relate in particular to the provision of information in a specific, accessible form, websites and mobile apps. With regard to retail banking, in particular, the perceptibility, functionality, comprehensibility and compatibility of consumer identification methods, electronic signatures, security and payment services are to be ensured.
Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purpose of money laundering or terrorist financing	10 July 2027	The AML Regulation, together with Regulation 2024/1620 on the establishment of the Anti-Money Laundering and Countering the Financing of Terrorism Authority (AMLA) and Directive 2024/1640, make up the package of new EU legislation related to AML and terrorist financing. Regulations are directly applicable in all EU Member States, the Directive requires implementation into national law. The new rules will replace the existing Directive 2015/849. The AML Regulation contains provisions on: • measures to be applied by obliged entities to prevent money laundering and terrorist financing, • transparency requirements on beneficial ownership for legal entities, trusts created by deed and similar legal arrangements, • measures to limit the misuse of anonymous instruments.

Representations of the Management Board of ING Bank Śląski S.A.

Correctness and reliability of the presented financial statements

To the best knowledge of the Bank Management Board, the semi-annual abbreviated consolidated financial statements and the comparable data were prepared in line with the applicable accounting standards and in a manner reliably and clearly presenting the economic and financial condition of the Bank Group and its financial result. The semi-annual management report from operations of the Bank Group contains a true picture of development and achievements and of the condition of the Bank Group in H1 2025, including a description of core hazards and risks.

SIGNATURES OF MEMBERS OF THE MANAGEMENT BOARD OF ING BANK ŚLĄSKI S.A.

2025-07-30	**Michał Bolesławski** President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Joanna Erdman** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Marcin Giżycki** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Bożena Graczyk** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Marcin Kościński** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Ewa Łuniewska** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Michał H. Mrożek** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Maciej Ogórkiewicz** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*
2025-07-30	**Alicja Żyła** Vice-President of the Bank Management Board	*/Signed by qualified electronic signature/*