

Sustainability statement



2024

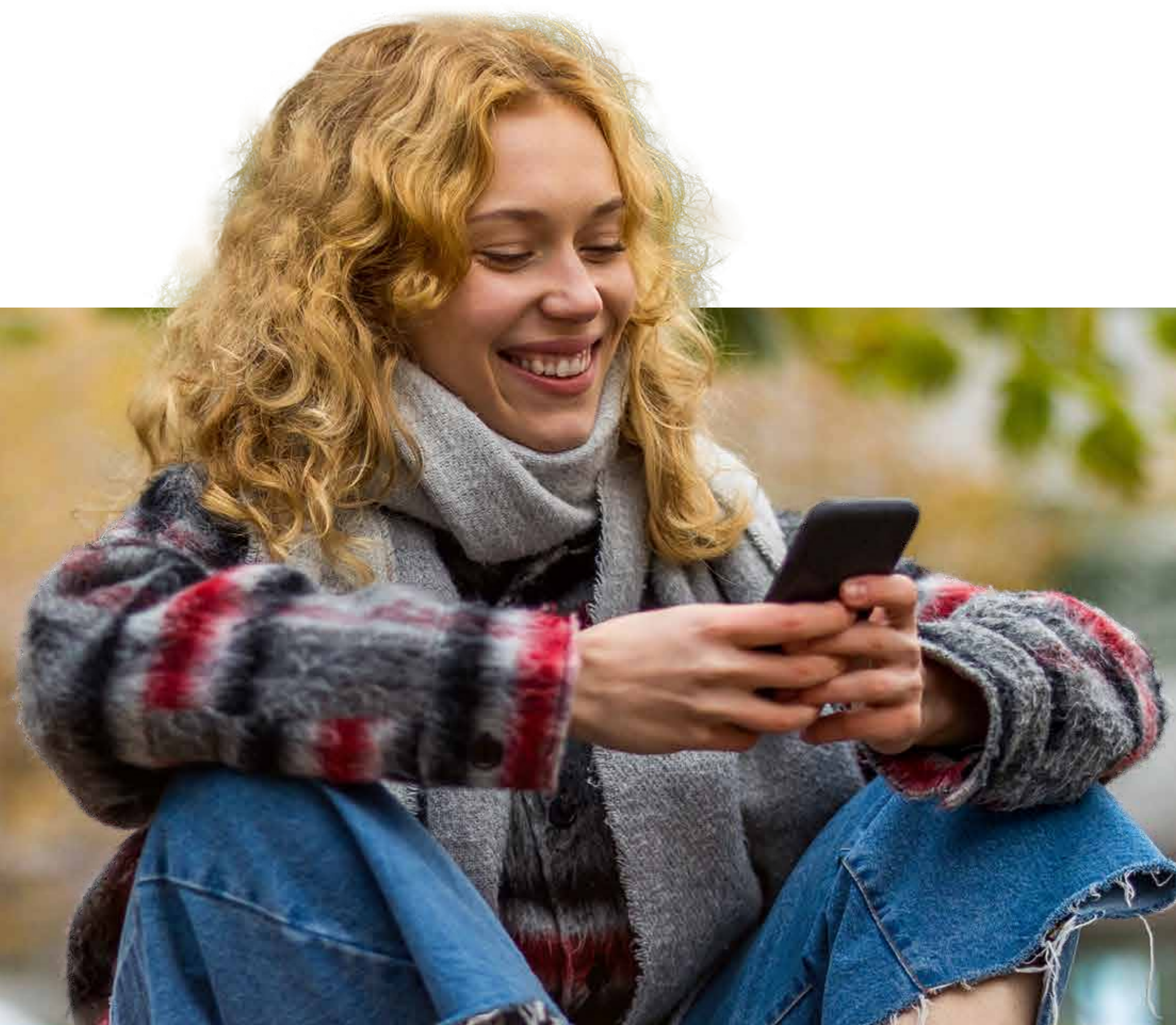




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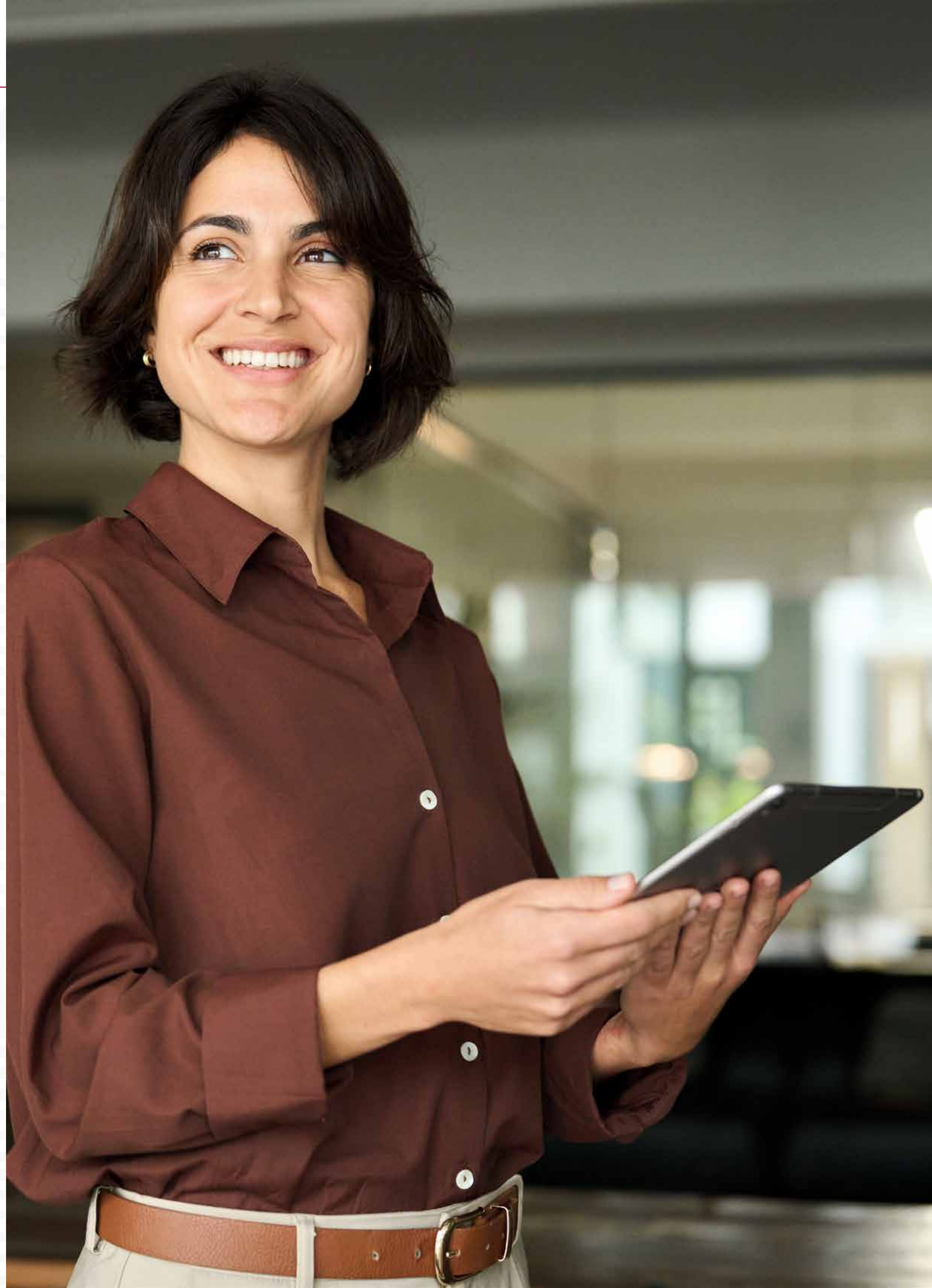
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General disclosures

ESRS 2





General basis for preparation of sustainability statements

BP-1

This sustainability statement for the Alior Bank Group consolidated under the full method covers the period from 1 January 2024 to 31 December 2024. The scope of consolidation is consistent with the consolidated financial statements of the Alior Bank Group. The statement forms part of the management board's business report in accordance with the Act of 6 December 2024 amending the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision, and Other Related Acts. This amendment modified the Accounting Act of 29 September 1994 (uniform text, Journal of Laws of 2023, item 120, as amended). The Act implements Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (Official Journal of the European Union L 322 of 16 December 2022, p. 15). The contents of this statement (hereinafter the "ESG 2024 report" or "report") comply with the Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards (Official Journal of the European Union of 2023, item 2772, as amended), Annex I, European Sustainability Reporting Standards (ESRS).

Alior Bank is the parent company of the Alior Bank Capital Group. Within the Group, subsidiaries carry out leasing activities aimed at business customers at Alior Leasing, individual customers at Alior Leasing Individual. AL Finance specialises in offering insurance to customers with financing and loan agreements. Alior Services Sp. conducts insurance agent activities for eight insurance companies and administers insurance contracts in the name and on behalf of the insurers. Within the Alior Bank Capital Group there is also Alior TFI, whose main activity is the management of the ALIOR SFIO investment fund, the distribution of participation units of which is carried out through Alior Bank S.A. However, the Company is still licensed to manage portfolios which include one or more financial instruments. The remaining companies provide information and computer technology services or are companies that provide services to Group companies. A detailed description of the activities of the Alior Bank Group's subsidiaries can be found in the Alior Bank Group Management Report in section ESRS 2.

Structure of the Alior Bank Group as at 31 December 2024

As at 31 December 2024, the Alior Bank SA Capital Group consists of Alior Bank SA as the parent company and subsidiaries in which the Bank holds a majority stake. There was no change in the structure of the Alior Bank SA Capital Group during the reporting period.

Subsidiary companies

The Bank has assessed its control in accordance with the regulations of IFRS 10 and has determined its status as a parent company to the following entities. All subsidiaries are consolidated using the full method. For a description of the principles for consolidation of subsidiaries, see note 3.2 of the Financial Statement.

Company name	Description of activity
Alior Services sp. z o.o.	insurance agent services to 7 insurance companies (contract administration)
Alior Leasing sp. z o.o.	financing of fixed assets through operational and financial leasing as well as leasing loans
Meritum Services ICB SA	information and computer technology services and other IT-related activities provision of IT software services
Alior TFI SA	asset management the Bank's cooperation with its subsidiary Alior TFI concerns mainly distribution of participation units of ALIOR SFIO the company continues to hold a licence to manage portfolios that include one or more financial instruments
Corsham sp. z o.o.	a company dedicated to venture capital investments includes, as part of its equity investments, minority stakes in entities operating in the area of new solutions on the financial and peri-financial market
RBL_VC sp. z o.o.	a company dedicated to venture capital investments, was entered in the register of Alternative Investment Company Managers (ZASI)
RBL_VC sp. z o.o. ASI spółka komandytowo-akcyjna	is an investment vehicle dedicated to making venture capital investments by Alior Bank SA



The statement covers the upstream and downstream value chain, as well as own transactions. Each of these levels has been considered in the assessment of impacts, risks, and opportunities. The scope also includes policies, actions, aims, and disclosed measures; however, not all of them apply to or affect each level of the value chain equally.

The undertaking has not used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation, nor the exemption from disclosure of impending developments or matters in course of negotiation under Article 19a(3) and Article 29a(3) of Directive 2013/34/EU.

The double materiality assessment contains forward-looking information and, as such, assumptions, judgements, projections and forecasts have been used in the identification and measurement of risks, in particular climate risks, and are therefore subject to uncertainty and may be subject to change in the future.

The sustainability statement has been attested with limited assurance in accordance with the National Standard on Attestation Engagements for Sustainability Reporting 3002 PL and the National Standard on Assurance Engagements Other than Audits and Reviews 3000 (Z) as set out in the International Standard on Assurance Engagements 3000 (revised) 'Assurance Engagements Other than Audits and Reviews of Historical Financial Information' based on which the attestation was performed.



Disclosures in relation to specific circumstances

BP-2

Pursuant to the ESRS standard, the Alior Bank Group has adopted the following time horizons:

- short-term time horizon that coincides with the reporting period (1 year),
- medium-term time horizon – 1 to 5 years,
- long-term time horizon –5 to 30 years
- and a perspective that includes all time horizons.

No indirect measures have been used for determination of the upstream and downstream value chain.

Scope 3 greenhouse gas emissions was determined based on estimated sources disclosed in this statement, including those reported under the SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.

The sustainability statement has been prepared for the first time in accordance with the ESRS guidelines - no data on changes in the preparation or presentation of information or reporting errors in previous periods can therefore be indicated. In previous years, sustainability data was disclosed based on the GRI standard.

The Alior Bank Group includes in this statement information disclosed under Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council (8), and Commission delegated regulations that specify this information and the methods of its disclosure. The Group incorporates information by reference to specific sections of the Management Board's 2024 Business Report, of which this statement is a part, as well as the Consolidated Financial Statement of Alior Bank Group for the year ended on 31 December 2024.

¹Alior Bank's long-term risk assessment is prepared over a 30-year horizon, so the same perspective is adopted for sustainability impacts, risks and opportunities.



The role of the administrative, management and supervisory bodies

GOV-1

In 2024, the Alior Bank Group was managed and supervised by the bodies of its parent company, i.e. Alior Bank which is a listed company supervised by the Polish Financial Supervision Authority (KNF). The Group is part of the PZU Conglomerate.

The Supervisory Board exercises supervision over the operations of the Bank across all areas. The Board oversees the implementation of internal governance at the Bank and assesses its adequacy and effectiveness at least annually. The Board may request information from the Management Board and employees of the Bank on any aspect of the Bank's activities and may require the Management Board to prepare expert reports and opinions in this regard. In order to ensure that its tasks are carried out effectively, the Supervisory Board has the option of using the services of external experts. In addition, the Board is responsible for the approval and supervision of the Alior Group's strategy and has a supervisory role over the work of the Bank's Strategy and Development Committee.

Alior Bank's Management Board and Supervisory Board oversee the implementation of the sustainability objectives in the business strategy. The President of the Management Board oversees the ESG area and the Vice-President in charge of the risk area is responsible for the ESG risk oversight. In addition, the organisation has a Sustainability Committee within which the President of the Management Board and the Vice-President responsible for the risk area are permanent members. The purpose of the Sustainability Committee is to build a platform for dialogue, decision-making and to provide recommendations to the Bank's Management Board regarding the implementation of ESG regulatory requirements and the impact of the Bank's activities on environmental, social and corporate governance issues.

In 2024, Members of the Management Board also participated in the double materiality assessment process, being responsible for the valuation of risks and opportunities. The Management Board and the Supervisory Board also reviewed the entire process and the conclusions and results of the double materiality assessment. A standing item was introduced into the cyclical Management Board meetings regarding the monitoring of the preparations for the publication of the Alior Bank Group Sustainability Statement. (The topic is discussed once every fortnight).

The Supervisory Board has an Audit Committee, which accepted the results of the double materiality assessment of sustainability issues in January 2025. The Audit Committee was also responsible for selecting the audit firm performing the attestation of sustainability reporting

The Board Member responsible for ESG risks was directly involved in the double materiality assessment process.

The members of the Management Board and the Supervisory Board did not undertake any additional sustainability learning.

As part of the division of its responsibilities, the Supervisory Board appoints an Audit Committee, a Risk Committee, an Appointments and Remuneration Committee and a Strategy and Development Committee from among its members. Alior Bank also establishes permanent or ad hoc advisory, opinion-giving, and decision-making committees through resolutions of the Management Board. The Bank's key permanent committees include the Capital, Assets, and Liabilities Management Committee (CALCO) and the Credit Committee.

The Management Board is responsible for implementing internal governance at the Bank and ensuring compliance. It must also assess and review internal governance at least once a year to adapt it to changes in the Bank's internal environment and external conditions. The Management Board reports to the Supervisory Board on the results of its assessment and any significant events that may impact the Bank's internal governance.

Number of Management Board members ¹	5
Number of executive members	5
Number of non-executive members	0
Number of female members	0
Percentage of female members	0%
Number of Supervisory Board members	8
Number of executive Supervisory Board members	0
Number of non-executive Supervisory Board members	8
Number of independent Supervisory Board members	3
Percentage of independent Supervisory Board members	38%
Number of female Supervisory Board members	0
Percentage of female Supervisory Board members	0%
Employee representatives in the Management and Supervisory Boards	0



As of 31 December 2024, the Alior Group Management Board consisted of six members, including a Supervisory Board member temporarily delegated to serve as Vice President of the Bank's Management Board. The Supervisory Board comprised eight members. The roles and responsibilities of the Management Board and Supervisory Board members are detailed in Section one of this Management Report. Sustainability matters were overseen by the following individuals.

The Vice President of the Bank's Management Board, Mr Piotr Żabski, is responsible for overseeing the Bank's Head Office units related to HR, PR, communications, CSR, personal data protection, support for the Bank's governing bodies, strategy, supervision of the Bank's subsidiaries. He also coordinates the work of the Head Office units responsible for internal audit and compliance risk management. He is also responsible for the day-to-day management of procedures for reporting legal violations, breaches of the Bank's policies, and business ethics rules, as well as for receiving related reports. In August 2024, Piotr Żabski assumed the position on the Bank's Management Board previously held by Grzegorz Olszewski until May 2024.

Since December 2024, Mr Marcin Ciszewski, Vice President of the Bank's Management Board, has been coordinating the work of the Bank's business units in managing material risks in operations and ESG risks. Prior to December 2024, Tomasz Miklas was responsible for ESG risks.

There were no employee representatives on the management or supervisory bodies of the Alior Bank Group in 2024.

In 2024, the Alior Bank Group did not have a system in place for monitoring and managing material sustainability topics. The parent company's management board approved the results of the double materiality assessment, and the risks identified in the process will be incorporated into Alior Bank's standard risk assessment system. The organisation has not yet implemented a formal division of responsibilities among the members of the Management Board regarding the material topics identified during the double materiality assessment, nor mechanisms for reporting these topics to management and supervisory bodies. Furthermore, in 2024, there was no formal mechanism in place for the Management Board to oversee the setting of objectives related to material impacts, risks, and opportunities.

Alior Bank's Management Board and Supervisory Board have continuous access to internal and external development activities to enhance their knowledge and skills in performing their duties. Training and other development methods are utilised to help members understand the Bank's internal governance, including its organisation, business model, risk profile, and their individual roles in these areas. These development activities are not limited to the business areas for which members are directly responsible. The Bank allocates time, budget, and other resources to support training and development initiatives. Training recommendations are prepared by the HR Division. Sustainability topics were covered in a training course organised in the first months of 2024. This training course was also conducted for new members of the Management Board and Supervisory Board in January 2025.





Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

GOV-2

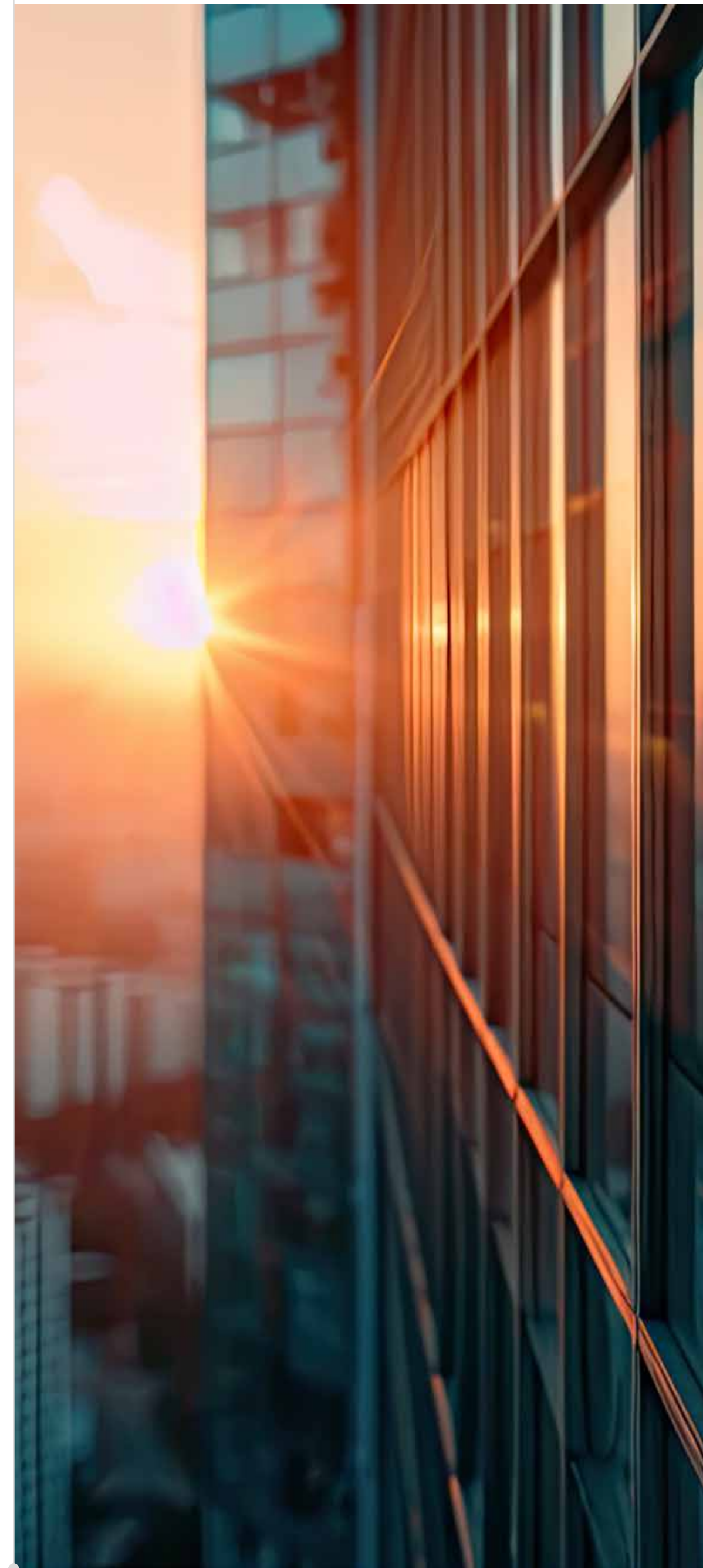
Supervision of sustainability issues within the Alior Bank Group is the responsibility of the Management Board of the parent company, Alior Bank. Elected members of the Bank's Management Board are directly responsible for the ESG area and ESG risks. They also chair the Sustainability Committee, which serves as a platform for dialogue within the organisation, uniting sustainability perspectives across various departments.

In 2024, Alior Bank also had an ESG Strategy Team (subsequently transformed into the ESG Strategy Unit) within the Strategy Department. Its responsibilities included activating, inspiring, and collaborating with all units across the organisation on sustainability topics, preparing the organisation for sustainability reporting disclosures, and coordinating related regulatory implementations. Furthermore, within the Bank's risk area, the Credit Risk Department is responsible for managing ESG risks, while the Operational Risk Management Department is tasked with identifying and calculating ESG risks within operational risks.

In 2024, a double materiality assessment was carried out for the first time at Alior Bank Group. Alior Bank plans to incorporate the material risks identified during the double materiality assessment into the standard risk system. The identified opportunities will be considered in the Bank's strategy for the coming years. It is also planned to introduce processes for monitoring performance and assessing the effectiveness of actions taken in terms of sustainable development.

In 2024, the Group conducted its first double materiality assessment to identify material impacts, risks and opportunities. In 2024, Alior Group's Management Board was informed of the results of the double materiality assessment and approved it in December 2024. A member of the Bank's Management Board was directly involved in the process of agreeing the methodology and valuing the risks and opportunities in the double materiality assessment. As part of the double materiality assessment, a workshop on the due diligence process was conducted. Its outcome was communicated to the Management Board as part of the presentation of the results of the double materiality assessment. The Management Board and members of the Supervisory Board are committed to ensuring that the Sustainability Statement meets the legal requirements and the sustainability reporting standards, ESRS. A summary of the double materiality assessment process was presented to the Audit Committee and representatives of the employee unions at Alior Bank in January 2025.

Moreover, the Supervisory Board will issue an assessment in the form of a resolution on the Financial Statement covering the Management Board Report of the Alior Bank Group for 2024, including the Management Board Report and the Sustainability Statement.



Integration of sustainability-related performance in incentive schemes

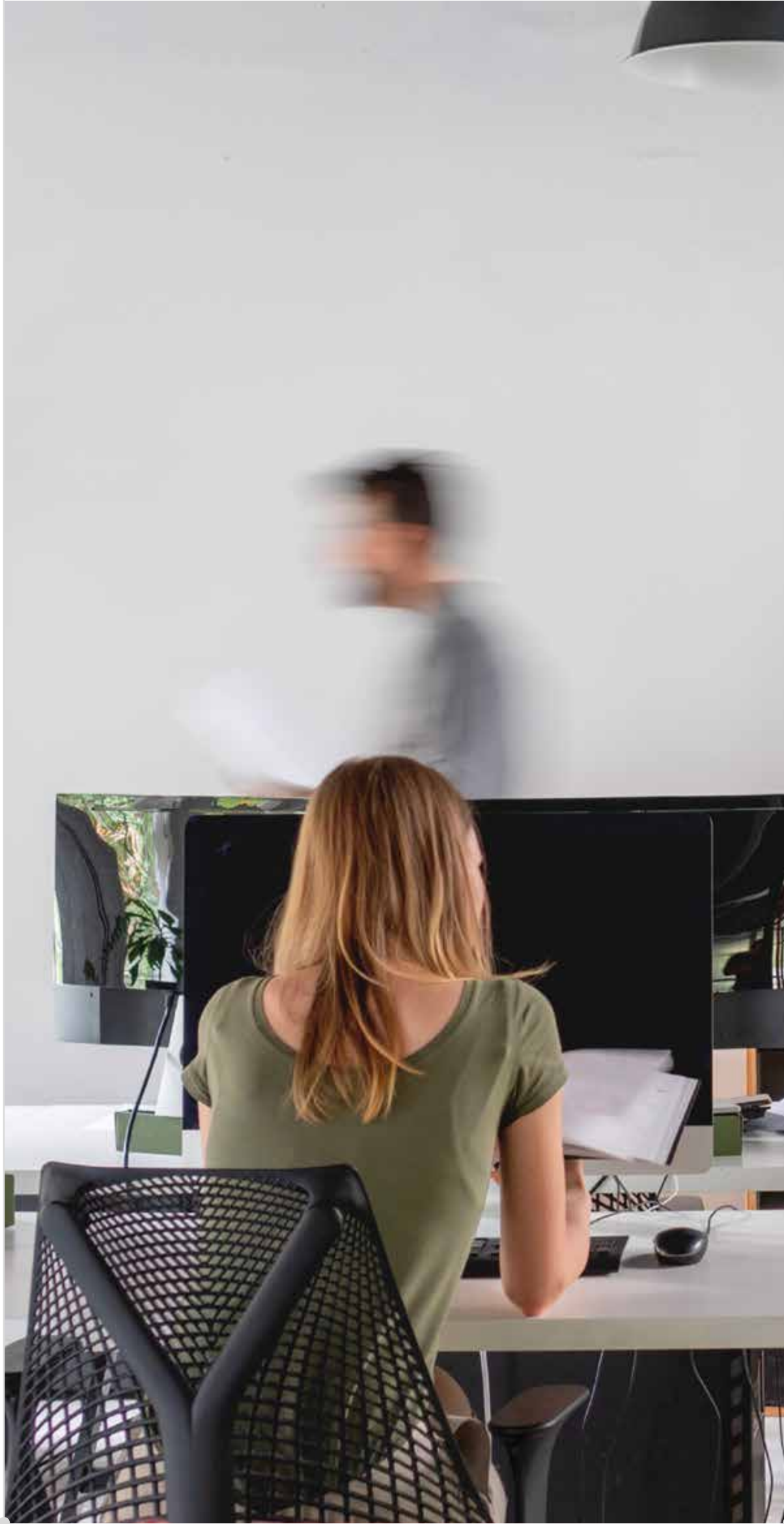
GOV-3

In 2024, the Alior Bank Group did not implement any incentive programmes or remuneration policies related to sustainability issues, including climate (in terms of greenhouse gas reduction targets), for members of the administrative, management, and supervisory bodies. The Bank's detailed remuneration policy is designed to support the implementation of its sustainability strategy and promote prudent risk management. Selected managers overseeing specific organisational units at the Bank's Head Office had defined objectives within particular ESG areas.



Statement on due diligence

GOV-4



Basic elements of the due diligence process

Basic elements of the due diligence process	Section of the sustainability statement
Incorporation of due diligence in corporate governance, strategy, and business model	GOV-1 – The role of the administrative, management and supervisory bodies GOV-2 – Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
Cooperation with stakeholders impacted by the Alior Group at all key stages of the due diligence process	SBM-2 – Interests and views of stakeholders GOV-2 – Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities
Identification and assessment of adverse impacts	SBM-2 – Interests and views of stakeholders SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities
Taking actions to mitigate the identified adverse impacts	E1-3 – Actions and resources in relation to climate change policies S1-4 – Taking action on material impacts on own workforce, adopting approaches to managing material risks and pursuing material opportunities related to own workforce, and the effectiveness of these actions S2-4 – Taking action on material impacts on workers in the value chain, adopting approaches to managing material risks and pursuing material opportunities related to workers in the value chain, and the effectiveness of these actions S4-4 – Taking action on material impacts on consumers and end-users, adopting approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and the effectiveness of these actions
Monitoring the effectiveness of these efforts and reporting on the results	SBM-2 – Interests and views of stakeholders

Risk management and internal controls over sustainability reporting

GOV-5

The Alior Bank Group has not implemented formal procedures for risk management and internal controls over sustainability reporting. All reporting within the Group is overseen by the Compliance Department, which also periodically monitors compliance with the regulatory requirements of sustainability reporting.

The information prepared by the Group for this statement was reviewed in two stages by the data owners, with additional verification in the context of compliance with the definitions carried out by the ESG Strategy Department. In addition, the sustainability statement is submitted to the Bank’s Management Board for signature and approved by the Supervisory Board.

The organisation is in the process of formalising all control issues within the full ESG reporting area.



Strategy, business model and value chain

SBM-1

The Alior Bank Group is a savings and loan institution that offers services to natural and legal persons (including foreigners). It provides services and products across three main segments: business, retail, and treasury operations.



Basic products categorised by segment and client

Business segment	<ul style="list-style-type: none"> □ credit products: <ul style="list-style-type: none"> □ overdraft facilities □ working capital facilities □ investment loans □ operating loans □ credit cards □ deposit and saving products: <ul style="list-style-type: none"> □ time deposits □ transaction and auxiliary accounts 	<ul style="list-style-type: none"> □ payment services: <ul style="list-style-type: none"> □ cash deposits and withdrawals □ bank transfers □ treasury products: <ul style="list-style-type: none"> □ currency exchange transactions (including currency forwards) □ derivatives □ leasing.
Retail segment	<ul style="list-style-type: none"> □ credit products: <ul style="list-style-type: none"> □ cash loans □ credit cards □ overdraft facilities □ real estate loans □ deposit and saving products: <ul style="list-style-type: none"> □ time deposits □ savings accounts 	<ul style="list-style-type: none"> □ brokerage products and investment funds □ personal accounts □ payment services: <ul style="list-style-type: none"> □ cash deposits and withdrawals □ bank transfers □ currency exchange transactions
Treasury operations	<ul style="list-style-type: none"> □ effects of managing global liquidity and currency positions resulting from the operations of the Group entities 	

In 2024, there were no material changes to the Group's client groups or the markets it serves. The only change in the markets served in 2024, which does not qualify as material in relation to the scale of operations, was the closure of the branch in Romania, which employed 52 people. The Group operates in the Republic of Poland, where it employs 7051 people.

In 2024, the parent company continued to implement the "Bank for Every Single Day, Bank for the Future" strategy, which has a two-year operational timeline (2023-2024) and an open strategic perspective. The strategy focuses on business development in line with ESG principles, which the bank plans to integrate into its operations and promote with its partners and clients.



The ESG areas included in the Strategy are:

- Responsibility for the social processes surrounding the organisation
- Readiness to respond to environmental and climate challenges
- Application of the highest governance standards.

In particular, Alior Bank declares a commitment to:

- Ensuring full compliance with sustainability regulations
- Implementing a detailed assessment of corporate clients' portfolios in terms of ESG factors
- Providing products enabling the use of EU and public administration funds for energy efficiency improvements.

In terms of stakeholder relations, the strategy aims for personalised communication based on a deep understanding of the client. This includes, among other things,

- a new and inclusive mobile app, with versions tailored to specific audience groups (such as seniors, children, and non-native speakers)
- real-time responses to client-generated events
- thousands of personalised message variants in active 1:1 communication.

One of the expected outcomes of these measures is to build secure digital habits among clients. The development of technology aims to enhance client acquisition across both remote and traditional channels through improved online accessibility, multichannel integration, increased sales efficiency, and reduced credit risk costs.

In terms of developing responsibility, the strategy includes, among other things, harnessing high IT efficiency, supported by one of the largest IT teams among Polish banks. One of the key pillars of the technological transformation is security, covering business continuity, trusted technology partnerships, and resilience. Cybersecurity is recognised as a fundamental element of innovative digital banking. Alior Bank acknowledges that the automation of processes and the increasing use of AI could potentially lead to digital exclusion for some clients. Although this issue is not part of the strategy, it is being closely monitored. However, the organisation expects that AI modelling will have a positive impact on clients by improving service quality and ensuring a better alignment of products with client needs.

As part of the New Production Model, the IT transformation will be aligned with ESG principles, and employees will be offered "Jobs of the Future" with flexible hybrid working as a key component. The strategy also aims for 52% female representation in management positions. Additionally, it seeks to foster a culture of development by implementing leadership, internship, and talent programmes to nurture individual talent.

The organisation aims to take responsibility for the social processes around it by prioritising the

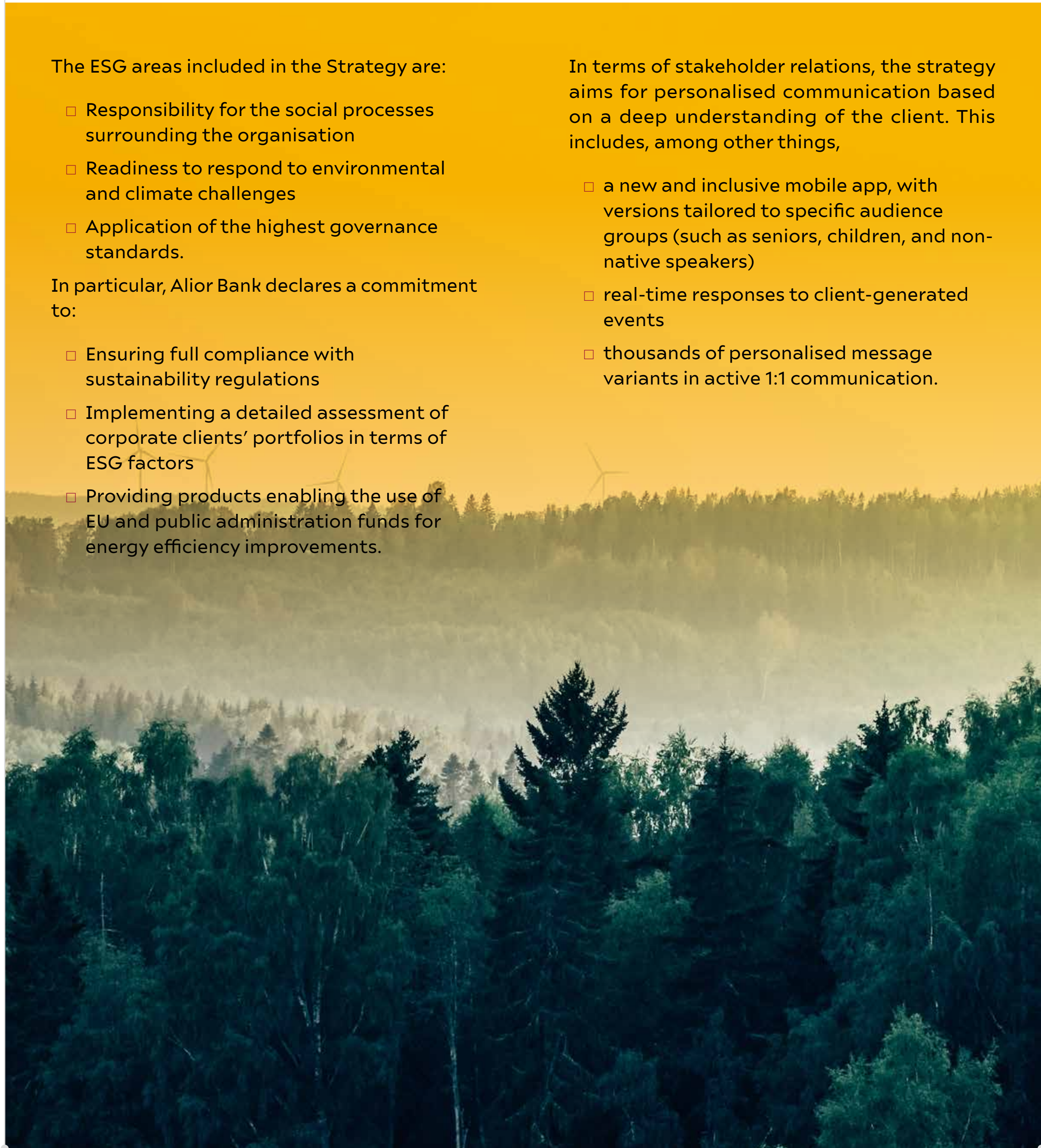
health of its employees and clients (facilitating access to co-funded health and psychological support, wellbeing programmes, and promoting preventive healthcare). Additionally, the organisation is committed to helping Ukrainian citizens in response to Russia's ongoing aggression against their country. It also plans to address environmental and climate challenges.

Supporting clients in the transformation process:

- implementing the evaluation of corporate client portfolios for ESG risks
- expanding the offering with sustainable banking products
- adding products that facilitate the use of EU and public funds.

Reducing the Bank's negative impact on the environment:

- developing the Bank's own zero-carbon energy source: a solar power system by the Data Centre in Krakow
- reducing the consumption of energy, paper, and plastics
- continuing measurements of scope 1 and 2 emissions, and initiating calculations for scope 3
- engaging employees in building an environment-friendly bank.





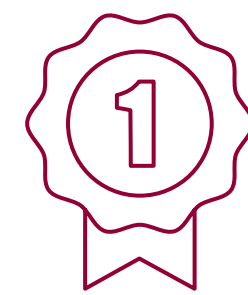
In its strategy the organisation committed to upholding the highest management standards. Consequently, as stated in the strategy, it plans to:

- improve its ESG ratings
- maintain high ratings for diversity policies
- provide ESG training for all employees
- develop ESG competencies in the bank's key areas
- publish its ESG policies and documents, including sustainability reports
- formulate a human rights policy and incorporate the Supplier Code of Ethics into the procurement process
- strengthen internal ESG risk management and ensure full compliance with sustainability regulations.

All of these targets were achieved by the end of 2024. Additionally, Alior Bank joined the Responsible Business Forum partnership and became a signatory of the Diversity Charter.

The 'Bank for Every Single Day, Bank for the Future' strategy was developed several months before the completion of the double materiality assessment process and therefore does not directly address the material risks, opportunities and impacts identified in the process.

Non-financial success metrics:



> 45

Net Promoter Score



> 65

employee engagement



²upplier Code of Ethics is available on the bank's website at <https://www.aliorbank.pl/dam/jcr:684db6f4-da46-4c6e-8bca-5f22022d2afc/kodeks-etyki-dostawcow-alior-bank.pdf>



Significant services (and examples of associated products) offered by companies from the Alior Bank Group

Entity and its clients	Products and services
Alior Bank S.A.	
Individual clients	<ul style="list-style-type: none"> □ Maintaining personal accounts tailored to the needs of specific client groups (e.g. Account for the Young, currency account). □ Offering savings accounts and deposits (e.g. Housing Account, Savings Account under the 800+ Family programme). □ Extending loans, i.e. offering clients financing and charging interest (e.g. Any Purpose Loan, consolidation loan). □ Mortgage lending – providing clients with financing for real estate purchases and related facilities (e.g. garage space) while charging interest, fees, and commissions (e.g. Mega-Mortgage loan, Own Flat in a Great City loan, credit bureau services). □ Additional services, including intermediation in the purchase of products and services, as well as handling administrative matters (e.g. e-Office).
Micro and small businesses	<ul style="list-style-type: none"> □ Day-to-day business services, including account management, transaction processing, intermediation in official processes, and cash services (e.g. iKonto Biznes, business account with payment terminal). □ Extending loans – providing clients with financing, credit card insurance, and refinancing (e.g. Business Credit, Selfie Loan). □ Servicing deposits, capitalising interest and providing security (e.g. time deposit for new funds for business clients).
Businesses	<ul style="list-style-type: none"> □ Day-to-day business services, including account management, transaction processing, intermediation in official processes, cash services, solutions for entrepreneurs (e.g. Business Account: Optymalny, Komfort 45, Agrokomfort). □ Extending loans, including financing RES projects and agribusiness, comprehensive credit agreement.
Housing cooperatives and associations	<ul style="list-style-type: none"> □ Account management, extending loans, bulk transaction processing (e.g. Loan with Thermo-modernisation or Renovation Bonus, Investment Loan, Association Account).
Others	<ul style="list-style-type: none"> □ Trade finance, including guarantees, factoring, lending, and residential escrow accounts. □ Treasury products, including hedging clients’ financial performance against fluctuations in market conditions. □ Issuing securities and raising capital on their market (e.g. shares listed on the WSE, bonds listed on the Catalyst market). □ Foreign currency transactions (e.g. foreign currency account, the eFX Trader platform).





Entity and its clients	Products and services
Alior Bank S.A. – Brokerage Department	<ul style="list-style-type: none"> □ Brokerage account management, intermediation of transactions on the WSE, New Connect, over-the-counter (OTC) market, foreign exchanges. □ Individual and bulk investment advice. □ Deferred payment services. □ Examples of products: Alior Exchange, Alior Trader 2 Platform, Online Quotes 3 and Quotes 5 Pro, Investor Dashboard).
Alior Bank S.A. – Logistics Department	<ul style="list-style-type: none"> □ Sale of real estate through a competitive bidding process without a minimum price.
Alior Leasing Sp. z o.o.	<ul style="list-style-type: none"> □ Enabling clients to use various assets without requiring immediate purchase, including cars, machinery, equipment, photovoltaic systems, and assets in the agricultural sector. □ Providing loans for the purchase of leased items. □ Auctions of post-lease vehicles. □ Providing a comprehensive monitoring system for the client’s fleet (e.g. Asystem GPS Alior Leasing platform).
AL Finance Sp. z o. o.	<ul style="list-style-type: none"> □ Intermediation in insurance contracts for leased assets.

The Alior Bank Group does not provide products or services that are banned in other EU markets, nor does it conduct business in the fossil fuel sector.

More information on expenditure and results in terms of present and anticipated benefits for clients, investors, and other stakeholders is provided in the Consolidated Financial Statement of Alior Bank Group for the year ended on 31 December 2024.

The Alior Bank Group provides a range of financial services, which may vary between its member companies.





Simplified value chain

Supply chain:	Own business:	Business banking:	Retail banking:	Leasing:	Investment funds:	Own investments:
<ul style="list-style-type: none"> □ Relations with suppliers, such as IT companies, data providers, cloud technologies, cards and payment systems □ Employee benefits □ Equipment - electronic equipment, furniture, payment terminals □ Natural resources/ media - water, electricity, renewable energy, fossil fuels □ Car fleet □ Physical security □ Equipment servicing, property protection, facility cleaning □ Credit agents 	<ul style="list-style-type: none"> □ Human resources management □ Investor relations and communication with capital market participants (fulfilment of disclosure obligations), □ Rental/lease of premises, management and modernisation, granting of property loans □ Offering and selling products and services and taking customer instructions □ Conducting debt collection activities in relation to customers □ Data processing 	<ul style="list-style-type: none"> □ Day-to-day business services, including account management, transaction processing, intermediation of official processes, cash handling, tools to facilitate business □ Trade finance, including guarantees, factoring, lending, housing trust accounts □ Currency operations □ Risk management □ Customer relationship building 	<ul style="list-style-type: none"> □ Account and account management, lending and borrowing bulk transaction processing □ Treasury products, including hedging of clients' financial performance against fluctuating market factors □ Brokerage account management, trade intermediation, investment advice: individual and bulk, OTP service □ Deposit processing, interest capitalisation, security provision □ Currency operations □ Risk management □ Customer relationship building 	<ul style="list-style-type: none"> □ Intermediation of insurance contracts for leased assets □ Provision of a comprehensive monitoring system for the customer's fleet □ Leasing services, including granting loans and organising post-lease auctions □ Building customer relationships 	<ul style="list-style-type: none"> □ Creation of commentaries, forecasts, reports and analyses concerning the economy and financial markets □ Asset management □ Currency operations 	<ul style="list-style-type: none"> □ Issuing securities and raising capital on the securities market □ Investment in renewable energy from own sources



Interests and views of stakeholders

SBM-2

The Alior Bank Group engages with stakeholders according to the Alior Bank S.A. Disclosure Policy governing communication with clients, capital market participants, and the media. In its communication with clients, it also adheres to Responsible Marketing Practices. The Group complies with all legal disclosure requirements for listed companies and strives to communicate regularly, timely, and effectively to meet stakeholder expectations.

Stakeholder identification was facilitated by the Group's value chain development, while dialogue (conducted through surveys and in-depth interviews) helped identify and assess impacts, risks, and opportunities as part of the double materiality process.

Key stakeholders:



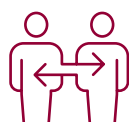
(Existing and future) business and retail clients



Employees



Shareholders



Suppliers and subcontractors



Regulatory and supervisory authorities



Media representatives



Clients

Clients represent a key stakeholder group for the Group. Their needs and expectations shape the business model and strategies related to products and services, which is why the organisation regularly conducts NPS surveys and has set a related target in its strategy. The Group respects the confidentiality of client information and manages this issue through measures such as its Security Policy, as well as ongoing technological advancements and safeguards.

Client communication channels:

- Helpline – it provides daily support for the bank's existing and potential clients (both individual and business clients), offering information and transaction services, including the acceptance of complaints and suggestions. It operates with full availability during selected hours, while support for security-related issues and unlocking access to online banking or the mobile application is available 24/7.
- Email – a contact form available on the website and dedicated mailbox; also used for informative purposes.
- CIB – messages in the electronic channels Alior Online and Alior Mobile, as well as Alior Kantor and Alior Kantor Mobile; information and transaction services for existing Alior Bank clients. This channel is used for responding to enquiries following a prior offline analysis of the issue, and accepting product service requests from clients.
- Social media – specifically, Facebook, Messenger and X. Social media are used to provide information to existing and potential clients.

- CzatBOT – available on both www.aliorbank.pl and after logging into Alior Online and Alior Mobile – serves an informative function for current and potential Alior Bank clients.
- BOT (voice) – streamlines information processes (e.g. branch opening hours, unblocking banking access) and transaction processes (e.g. loan repayment, loan overpayment, account balance/history).



Employees

The Bank conducts employee opinion and engagement surveys to reinforce the positive aspects of the jobs created and identify areas for improvement.

Employee communication channels:

- monthly one-hour meetings with President at the bank's head office, which employees can attend either in person or remotely. During these meetings, employees have the opportunity to ask questions directly to President.
- Company newsletter and intranet.
- Representatives of the HR division, empowered to handle matters related to social dialogue, take positions on behalf of the bank and mitigate related risks. They also keep the Management Board informed of ongoing discussions with employees. The HR division is equipped with the necessary tools to collect employee feedback on an ongoing basis, communicate Board decisions to staff, and conduct training, including on applicable policies.

- The e-NPS surveys provide valuable insights that enable fact-based decisions to be made about necessary measures in the employee area.
- Trade unions – Alior Bank is home to six trade unions, including two company-level and four inter-company organisations, which represent employees and advocate for their interests. Communication with the unions is conducted with respect for the principles of social coexistence, good faith, and legal compliance. Both parties are guided by mutual trust, aiming to reach compromises during negotiations. In cases of significant differences, they seek consensus on at least the most fundamental issues. The ongoing dialogue between the trade unions and the bank, as an employer, focuses on reaching agreements on matters that are economically and socially important, both on a macro and micro scale.



Shareholders and media

The Investor Relations and Corporate Governance Department is responsible for ensuring transparent and reliable communication with capital market participants. The Group acknowledges the critical importance of providing equal access to information for these stakeholders.

Shareholders and media communication channels:

Strona internetowa w języku polskim i angielskim, na której zamieszczone są informacje, które mają lub mogą mieć wpływ na kształtowanie się kursu akcji banku. Interesariusze mogą

- The website, available in both Polish and English, provides information that may impact the Bank's share price. Stakeholders can access current, interim, quarterly, and annual reports, performance presentations, and download editable files containing the most relevant data about the Bank at any time.
- Performance conferences – organised on the day of the publication of interim reports by the Investor Relations and Corporate Governance Department, in collaboration with the Communications and CSR Department. The main participants are journalists, investors, and stock market analysts. During these conferences, members of the Bank's Management Board present the financial results, discuss the most significant events of the period, and answer any questions. The Bank publishes recordings of the conferences on its website.

- Meetings, teleconferences, and videoconferences with investors and analysts – attended by members of the Management Board and representatives from departments responsible for risk management, capital strategy, controlling, and other areas. The goal is to discuss Alior Bank's current financial and operational situation, present the operating strategy, and outline the planned directions for further development.
- Investor conferences – attended by representatives of the Bank serve a similar informative function to other such meetings.



Suppliers and subcontractors

Relationships with suppliers are business-oriented, and communication primarily takes place through bank representatives. This is particularly true for the Supplier Qualification process, which introduces the organisation's cooperation standards and expectations while collecting necessary information to verify factors such as financial stability, so-called red flags (publicly available information), checklists (including the Polish Financial Supervision Authority's Public Warning List), taxpayer status, and any incidents that may threaten banking activities. When entering into a partnership, suppliers sign a Statement of Business Ethics, committing to adhere to certain ethical standards. Like other stakeholders, business partners can also use the bank's website as a communication channel.



Regulatory and supervisory authorities

The Alior Bank Group submits all legally required information to the regulatory authorities. This is a special category of stakeholders for whom the documents published by the Ban, such as policies, regulations, reports, procedures, and standards (including ethical standards), are crucial for verifying the implementation of the guidelines provided to the organisation.

Key stakeholders

In 2024, the Alior Bank Group was working on a new organisational strategy and did not have data to report regarding the extent to which stakeholder views had been incorporated into the document.

The double materiality assessment process involved a dialogue with stakeholders, including bank staff. They provided feedback on their perception of Alior Bank's environmental, social, and corporate governance impact through a questionnaire. A human rights due diligence workshop was also conducted with representatives from various employee groups. Through these efforts it was possible to identify the organisation's impacts, risks, and opportunities across the three ESG pillars. The most relevant topics and sub-topics for reporting were selected for inclusion in the sustainability disclosures within this statement, which is part of the Alior Bank S.A. Group Business Report prepared by the Management Board. The outcomes of this process were presented to the Management Board and received its approval. The results of the materiality analysis and the reporting topics were communicated to trade union representatives. The publication of this statement serves as a means of informing all stakeholders (both internal and external) about Alior Bank's sustainability efforts.



Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3

The Alior Bank Group, through its business activities in the financial sector, identified 57 impacts (both issues that are materially affected by the Group and issues that materially affect the Group's operations) positive and negative, of which 19 were considered material. 4 time perspectives were used to assess the impacts:

- short (1 year)
- medium (1 to 5 years)
- long (from 5 years to 30 years) or
- all time horizons.

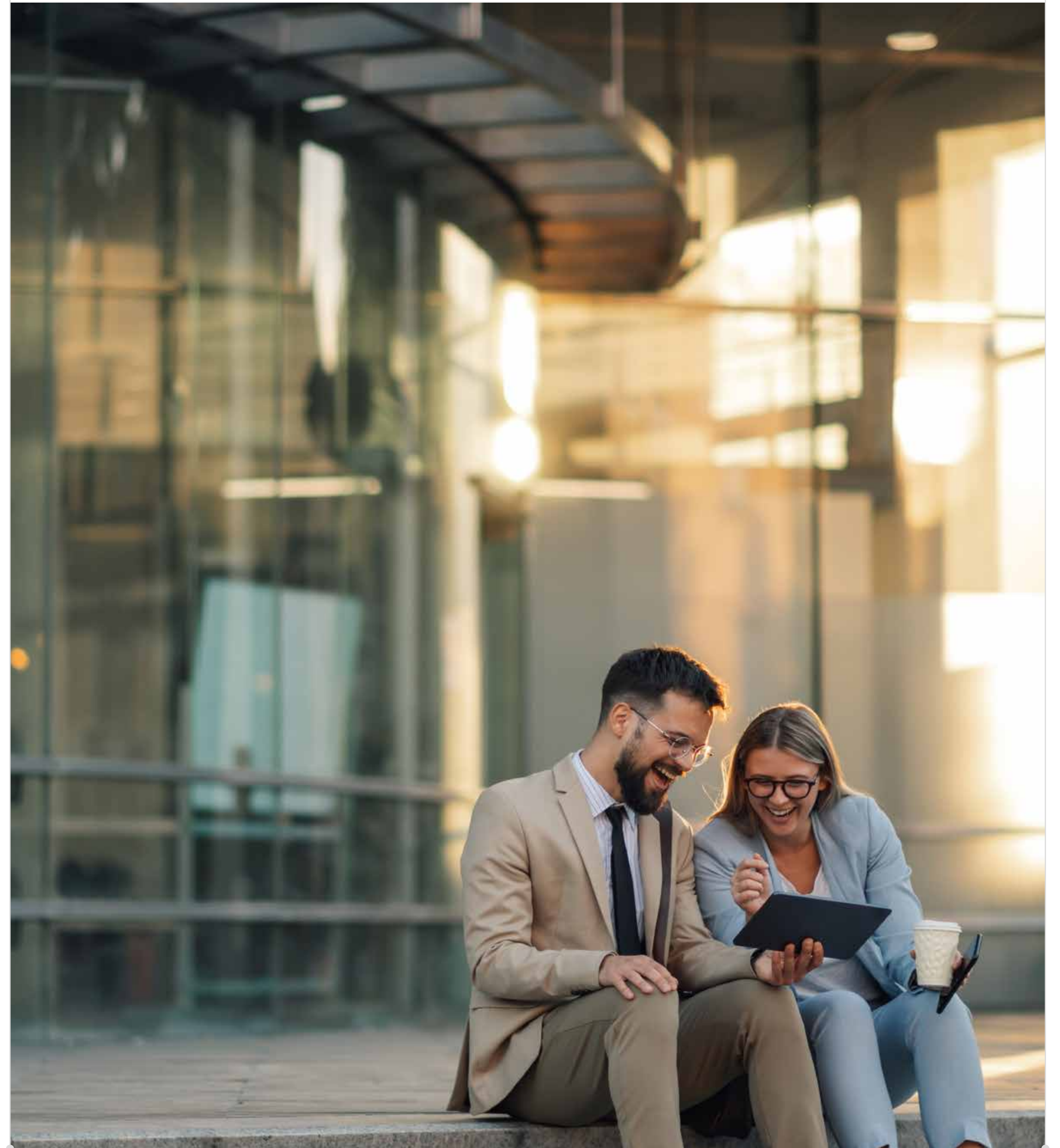
The following were also defined:

- their type: positive or negative
- the timing of their impact: actual or potential (i.e. likely to occur in the future)
- place in the value chain: downstream, upstream, own operations, entire value chain and
- related stakeholders.

278 risks were identified, of which 10 were categorised as material, including 4 in area E, 5 in area S and 1 as an own indicator in G, not included in the ESRS. Each risk was measured over the following horizons: one year, five years and 30 years, assuming balance sheet constancy. Two parameters were assigned to each risk: the total amount of potential loss/cost and the probability of occurrence. Three significant opportunities were identified in Area E.

The Group identifies material impacts, risks, and opportunities in the following areas:

- climate change in relation to greenhouse gas emissions and their mitigation in connection with the business model and strategy
- own employees and those in the value chain, such as in the areas of information processing, privacy rights, whistleblowing, and health and safety
- consumers and end users (clients) with a focus on protecting their consumer rights
- ethical business conduct, especially regarding anti-corruption, which also plays a significant role in the organisation's business model. Due to the Group's business sector and strategy, an own indicator - cybersecurity - was also added.





Material impacts, risks, and opportunities identified by the Alior Bank Group in the double materiality assessment process

Sustainability matters			Impacts	Type of impact	Location in the value chain	Time perspective	Risks and opportunities	Type	Location in the value chain	Time perspective
Topic	Sub-topic	Sub-sub-topics								
E1 Climate change	Climate change adaptation		No material impacts	-	-	-	Threats of violent events caused by extreme weather and long-term climate change, potentially leading to reduction in asset value (primarily mortgage-backed real estate), increase in production costs, and disruptions to business operations (physical risks)	Risk	Whole value chain	Long
E1 Climate change	Climate change adaptation		No material impacts	-	-	-	Incurring costs and allocating resources for emissions reporting, particularly across all scope 3 categories (political and legal transition risks)	Risk	Whole value chain	Medium
E1 Climate change	Climate change adaptation		No material impacts	-	-	-	A need to replace products and services in the supply chain with low-carbon alternatives	Risk	Whole value chain	Long
E1 Climate change	Climate change adaptation		No material impacts	-	-	-	Costs associated with implementing low-emission technologies in own operations	Risk	Lower level	Long
E1 Climate change	Climate change adaptation		No material impacts	-	-	-	Increase in revenue through expanding the range of green products, including issuing green bonds and offering green financing	Opportunity	Lower level	Medium
E1 Climate change	Climate change adaptation		No material impacts	-	-	-	Increase in revenue through developing an ESG investment fund	Opportunity	Lower level	Medium
E1 Climate change	Climate change adaptation		No material impacts	-	-	-	Expanding ESG advisory services within the brokerage department	Opportunity	Lower level	Medium
E1 Climate change	Climate change mitigation		Impact on climate change through greenhouse gas emissions resulting from the Group's operations	Actual negative	Whole value chain	Long	No material risks or opportunities	-	-	-



Sustainability matters			Impacts	Type of impact	Location in the value chain	Time perspective	Risks and opportunities	Type	Location in the value chain	Time perspective
Topic	Sub-topic	Sub-sub-topics								
E1 Climate change	Climate change mitigation		environmental impact through offering green loans to micro businesses, small and medium-sized enterprises, housing cooperatives and associations, planning to enhance energy efficiency through infrastructure upgrades	Potential positive	Lower level	Long	No material risks or opportunities	-	-	-
E1 Climate change	Climate change mitigation		Impact on improving air quality, reducing the carbon footprint, and contributing to the fight against climate change through making available the opportunity to apply for a Clean Air Programme loan or grant	Potential positive	Lower level	Long	No material risks or opportunities	-	-	-
E1 Climate change	Climate change mitigation		Financing the purchase of equipment and installations designed to reduce energy consumption and produce renewable energy through Ekorata offering	Potential positive	Lower level	Long	No material risks or opportunities	-	-	-
S1 Own workforce	Working conditions	Secure employment	No material impacts				Additional costs of recruiting and onboarding new staff due to employee turnover	Risk	Own operations	Short
S1 Own workforce	Working conditions	Social dialogue	Impact on labour law compliance due to insufficient communication regarding the possibility of reporting violations	Potential negative	Own operations	Short	No material risks or opportunities	-	-	-



Sustainability matters			Impacts	Type of impact	Location in the value chain	Time perspective	Risks and opportunities	Type	Location in the value chain	Time perspective
Topic	Sub-topic	Sub-sub-topics								
S1 Own workforce	Working conditions	Freedom of association, the existence of works councils and the information, consultation and participation rights of workers	Impact on good working conditions through regular employee satisfaction surveys, which help identify and address employee needs and areas for improvement, fostering a more engaged and satisfied team	Actual positive	Own operations	Short	No material risks or opportunities	-	-	-
S1 Own workforce	Working conditions	Health and safety	Impact on occupational health and safety through the development and implementation of internal health and safety regulations, building awareness of safe behaviour in the workplace and premedical assistance skills	Actual positive	Own operations	Medium	No material risks or opportunities	-	-	-
S1 Own workforce	Equal treatment and opportunities for all	Diversity	Impact on equal development opportunities regardless of gender due to the lack of representation of women at the highest levels of management	Actual negative	Own operations	Medium	Reputational risks related to the lack of diversity among members of the highest management	Risk	Own operations	Medium
S1 Own workforce	Other work-related rights	Privacy	Impact on privacy rights due to data breaches and the misuse of client or employee information	Potential negative	Own operations	Medium	No material risks or opportunities	-	-	-



Sustainability matters			Impacts	Type of impact	Location in the value chain	Time perspective	Risks and opportunities	Type	Location in the value chain	Time perspective
Topic	Sub-topic	Sub-sub-topics								
S2 Workers in the value chain	Working conditions	Social dialogue	Impact related to breaches by partner facility staff and intermediaries due to a lack of (initial and refresher) training on the Whistleblowing and Whistleblower Protection Policy and the Code of Ethics	Potential negative	Higher level	Short	No material risks or opportunities	-	-	-
S4 Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy	Impact on the privacy of client information through the development and implementation of a Security Policy and other applicable procedures	Actual positive	Lower level	All time horizons	No material risks or opportunities	-	-	-
S4 Consumers and end-users	Information-related impacts for consumers and/or end-users	Access to (quality) information	Impact on access to information through the development and implementation of a Disclosure Policy which, with regard to communication with clients, capital market participants and the media, sets out the principles of safe and friendly communication and defines its terms and forms	Actual positive	Lower level	All time horizons	Risk related to increased consumer protection in the future in terms of access to information, including in relation to the construction of contractual clauses (such as free credit sanctions, mortgage contracts indexed to foreign currencies)	Risk	Lower level	Medium
S4 Consumers and end-users	Personal safety of consumers and/or end-users	Security of a person	Impact on the financial security of customers through measures related to customer complaints	Potential negative	Lower level	Short	No material risks or opportunities	-	-	-



Sustainability matters			Impacts	Type of impact	Location in the value chain	Time perspective	Risks and opportunities	Type	Location in the value chain	Time perspective
Topic	Sub-topic	Sub-sub-topics								
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Access to products and services	Impact on greater social inclusion in financial services through the creation of no-fee bank accounts, microcredit and microfinance available to all, including low-income and young people	Actual positive	Lower level	Short	Portfolio risk related to failures in transmission infrastructure	Risk	Whole value chain	All time horizons
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Access to products and services	Impact related to digital exclusion from customer financial services through over-automation of customer service processes and use of AI	Potential negative	Lower level	Short	No material risks or opportunities	-	-	-
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Responsible marketing practices	Impact on responsible marketing practices through the development and implementation of an Anti-Misselling Policy that prevents misselling practices	Actual positive	Lower level	All time horizons	The risk of increased consumer protection in the future in terms of responsible marketing practices, such as the way in which investment fund participation certificates are distributed	Risk	Lower level	Medium
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Responsible marketing practices	Impact on the protection of customers' rights through the Client Ombudsman, who independently assesses the bank's actions and ensures reliable verification of compliance with contracts, which builds trust and transparency in customer relations	Actual positive	Lower level	All time horizons	No material risks or opportunities	-	-	-



Sustainability matters			Impacts	Type of impact	Location in the value chain	Time perspective	Risks and opportunities	Type	Location in the value chain	Time perspective
Topic	Sub-topic	Sub-sub-topics								
G1 Business conduct	Protection of whistle-blowers		Impact on the right to report violations and the protection of whistleblowers, ensured by the Whistleblowing and Whistleblower Protection Policy and its complementary Procedures for Reporting Unwanted Behaviour at Alior Bank S.A., regulating in detail the employer's actions upon receiving reports of irregularities in the work environment	Actual positive	Whole value chain	Short	No material risks or opportunities	-	-	-
G1 Business conduct	Corruption and bribery	Prevention and detection including training	Impact on preventing corruption and bribery through employee training in anti-fraud procedures and ethical conduct	Potential positive	Own operations	All time horizons	No material risks or opportunities	-	-	-
Entity specific	Cyber security		No material impacts				Cybersecurity risk from a DDoS attack, which could result in system unavailability for clients	Risk	Whole value chain	All time horizons



Material risks identified through the double materiality assessment will be integrated into Alior Bank's standard risk assessment system. Additionally, the identified opportunities will be incorporated into the bank's new strategy.

The Group did not have the data to report the ongoing financial impact of material risks and opportunities on its financial position, performance, and cash flows for 2024.

There was also no analysis of the resilience of the strategy and business model in terms of addressing material impacts and risks, as well as leveraging material opportunities.

An analysis of the resilience of the strategy and business model to climate-related risks was conducted in Q2 2024 as part of a double materiality assessment to identify risks and opportunities. All risks identified through this process, along with their respective positions in the value chain, were considered. A high emissions climate scenario based on the Intergovernmental Panel on Climate Change's Climate Change 2021 The Physical Science Basis and the International Energy Agency's Net Zero Emissions by 2050 climate scenario were analysed in detail. Based on the resilience analysis, climate change-related physical and transition risks have been identified.

The Group is aware of its potential impact on climate change and the associated risks and opportunities. The resilience analysis highlighted relevant climate risks, including the potential impact of sudden weather events such as floods, fires, and storms. These events could damage or destroy mortgage-backed properties or disrupt the operations of borrowers through damage to transmission infrastructure, leading to a decrease in the value of collaterals and an increase in credit risk. Such situations will necessitate additional loan loss provisions. Moreover, the financial sector faces specific challenges and responsibilities regarding the GHG Protocol. While direct emissions are generally lower in the financial sector compared to industrial sectors, indirect emissions can be significant due to the financing of various projects and economic activities. Investment is a key Scope 3 emission category for the financial sector. Banks, investment funds, and other financial institutions must account for emissions related to investments in companies and projects. Adapting to climate change under a net-zero scenario it is necessary to acknowledge the risks associated with accurately calculating and reporting the carbon footprint, ensuring the effective implementation of low-carbon technologies by borrowers, and adapting products and services across the value chain to a low-carbon model. At the same time, opportunities related to the development of sustainable products and ESG advisory services are also recognised.



The analysis was based on data such as:

- Net Zero Emissions by 2050 Scenario of the International Energy Agency (although it is one of several available scenarios, it was selected because UE law aims for its implementation)
- High Emissions Scenario (SSP5-8.5 'Fossil Fuel Driven Development') IPCC Climate Change 2021 Report: The Physical Science Basis
- specific guidance for the financial sector under the GHG Protocol (Accounting and Reporting Standard for the Financial Industry), which helps financial institutions measure and manage emissions associated with their investment activities. It includes methodologies for assessing emissions in investment and credit portfolios
- specific guidance for corporations under the GHG Protocol (Corporate Accounting and Reporting Standard)
- Partnership for Carbon Accounting Financials database.

This statement applies to all individuals employed with the Alior Bank Group. The Group recognises the following categories of employees within own workforce:

- individuals employed by the Bank on at least a 0.4 FTE basis ("employees"),
- individuals who are not employees but perform specific tasks or work for the Bank ("contracted individuals" – service providers).

Additionally, Alior Bank S.A. recognises the category of partners – sole traders.

Alior Bank considers individual clients to be the end-users significantly impacted by the organisation, and categorises them into deposit clients and credit clients. This group may include financially disadvantaged individuals who are particularly vulnerable to privacy issues or impacts of marketing and sales strategies.

Value chain employees who may be significantly impacted by Alior Bank are the employees of the Bank's partner facilities. They are included within the scope of this statement.

In accordance with its Human Rights Policy, Alior Bank S.A. firmly opposes all forms of modern slavery, forced labour, or torture. The Bank strictly adheres to minimum age regulations for its employees and ensures that all rights related to personal dignity are protected.

The Alior Bank Group has identified four risks arising from its impacts and dependencies related to own workforce, including two material: the risk of additional costs associated with recruiting and onboarding new staff due to employee turnover (employee resignations), and the reputational risk of insufficient diversity



among members of senior management in the short term. The latter is linked to the negative impact on equal development opportunities, particularly the lack of female representation in the senior management, which could affect gender equality in the medium term. The Alior Bank Group did not identify any opportunities or risks arising from the impact or dependence on employees within the value chain. The organisation also did not identify any material impacts on its own workforce resources that may result from transition plans.

The Bank operates exclusively in Poland, in accordance with applicable regulations, and does not engage in activities deemed to carry significant risk of forced, compulsory, or child labour. The Bank is not aware of any exposure to harm for individuals with specific characteristics, working in particular contexts, or engaged in certain activities.

The Alior Bank Group did not identify child labour, forced or compulsory labour, including those associated with specific geographic areas or services offered, as a material issue.

The double materiality assessment identified one potential negative impact related to employees within the value chain: the possibility of violations by employees of partner facilities and intermediaries due to a lack of training on the Whistleblowing and Whistleblower Protection Policy and the Code of Ethics (insufficient initial and refresher training). The topic has been identified as material.

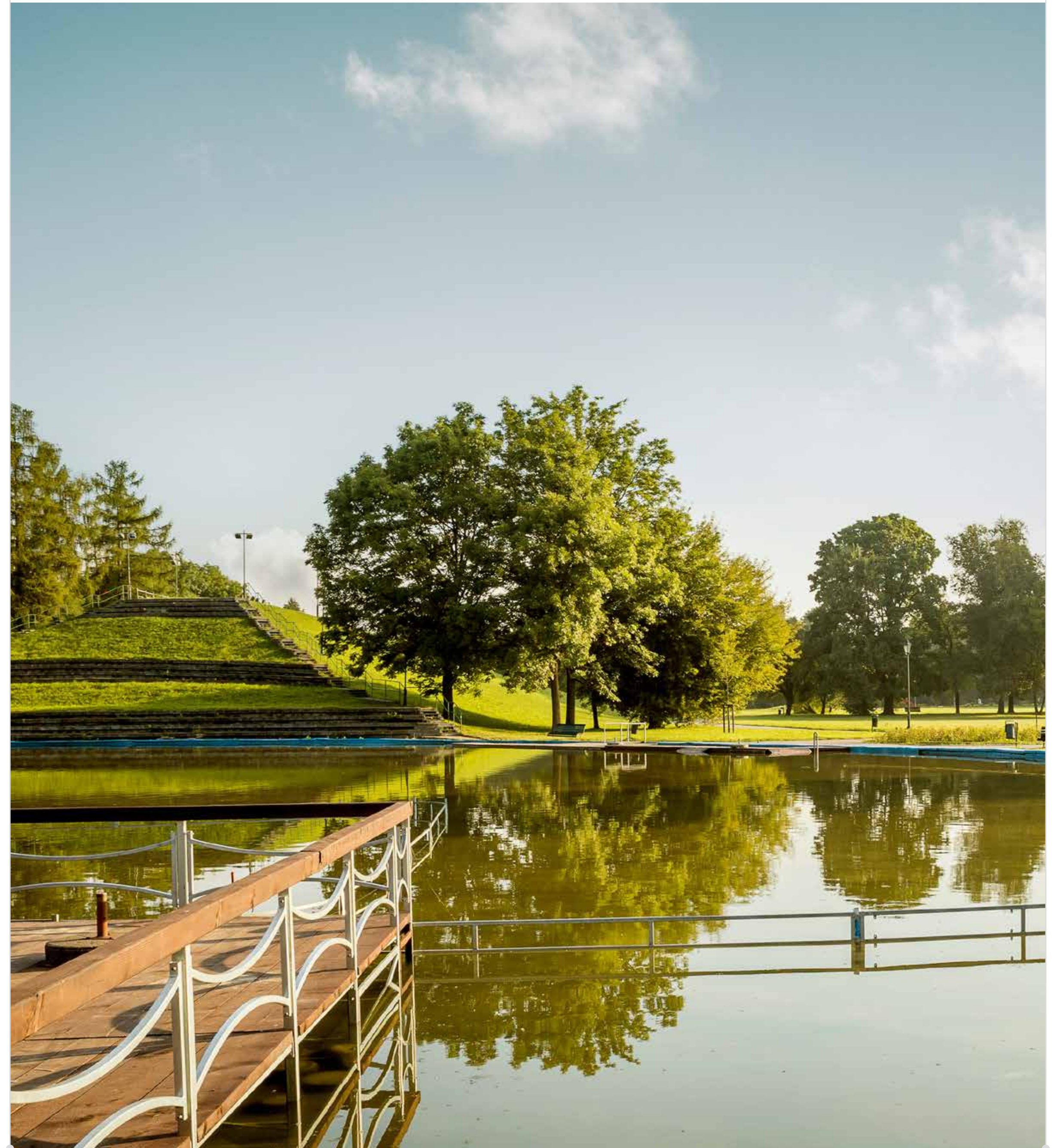
The double materiality assessment identified three consumer-related risks: risk associated with increased consumer protection in the future in terms of access to information, including those associated with the design of contractual clauses (such as free credit sanctions, mortgage contracts indexed to foreign currencies), portfolio risks associated with transmission infrastructure failures and risks associated with increased consumer protection in the future

in terms of responsible marketing practices, such as the way in which investment fund participation certificates are distributed. No material opportunities related to clients and end-users were identified. As for consumers, the double materiality assessment identified two potential negative impacts:

- related to digital exclusion of clients from financial services due to excessive automation of the customer service process and the use of AI, which can be considered systemic. This includes deaf individuals (who encounter barriers when trying to open an account with the Bank due to an IVR message and the absence of an online sign language interpreter), and blind individuals (who face challenges in managing their accounts through digital channels or, while they may be able to manage their accounts, they experience significant difficulties due to the lack of an internal policy requiring technology production units to adhere to accessibility guidelines during the implementation phase of digital services)
- impact on the financial security of customers through customer complaints handling

The following actual positive impacts of the Bank were identified:

- impact on access to information through the development and implementation of a Disclosure Policy governing communication with clients, capital market participants, and the media which sets out the principles for safe and friendly communication and defines its terms and forms
- impact on the protection of clients' rights through a Client Ombudsman, who independently evaluates the





Bank's actions and verifies compliance with agreements, fostering trust and transparency in client relationships

- impact on greater social inclusion in financial services by offering free bank accounts, microloans, and microfinance solutions accessible to all, including low-income individuals and young people;
- impact on responsible marketing practices by developing and implementing Anti-Unfair Sales Policy to prevent misselling practices, in a continuous perspective.

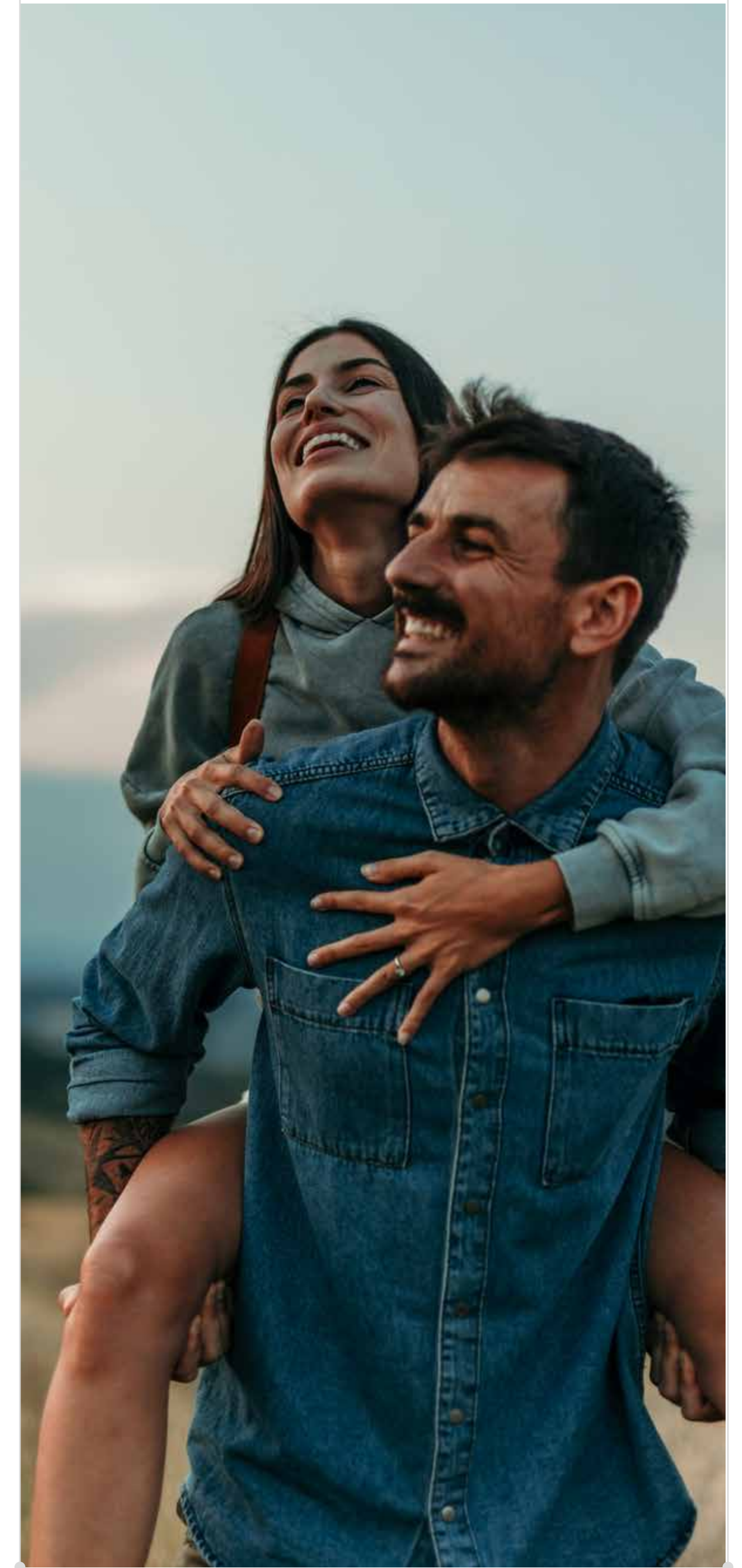
Actions taken by the Alior Bank Group companies that enable the above positive impacts include:

- ensuring transparent and understandable communication by simplifying the texts of agreements and regulations,
- establishing a dedicated unit within the company to address service accessibility issues, alongside conducting research on user needs and exploring ways to adapt the offer accordingly,
- introducing new functionalities in Alior Leasing's online Client Zone.

In 2024, Alior Bank implemented measures to help the organisation identify and better understand selected groups of vulnerable clients. The bank conducted research on how children aged 7-13 and seniors use its mobile app. The analysis of the results highlighted security concerns within both groups. Alior Bank did not conduct analyses on other groups of vulnerable consumers. No similar research was carried out at Alior Leasing in 2024.

As this statement is the first to be prepared in accordance with the ESRS standards, it is not possible to identify changes in the entity's material impacts, risks, and opportunities compared to the previous reporting period.

In this statement the Alior Bank Group reports one entity specific disclosure (not covered by the ESRS) related to ESRS G1 business conduct concerning cybersecurity risks, going beyond the topics covered in AR1 16 ESRS.





Description of the processes to identify and assess material impacts, risks and opportunities

IRO-1

In 2024, the Alior Bank Group identified material sustainability issues through a double materiality assessment process. In preparing the assessment, the Group examined its activities within the context of key impact areas, risks and opportunities. Internal documents, ongoing and planned activities, organisational practices, as well as legal regulations and other sources indicating potential topics, were reviewed. To determine the scope of impact, the Group also developed its value chain with input from representatives of various departments. The resources and activities mapped in the chain were expanded to include key stakeholder relationships. As this was the first time this process was conducted, it is not possible to identify changes from previous assessments.

The assessment covered the full list of sustainability issues included in the ESRS requirements, including these related to climate change, biodiversity and ecosystems, water, pollution, the circular economy, business conduct, own workforce, workers in the value chain, affected communities, and consumers and end-users. The impact workshop on due diligence looked at the impact on human rights along the value chain. The impact materiality perspective examined four parameters: the scale of the impact (how significant the impact is), its extent, probability, and irreversibility. Meanwhile, the risks and opportunities materiality perspective focused on two parameters: the financial scale (potential loss or gain) and probability. The parameters were assessed based on quantitative or qualitative thresholds, determined from a variety of sources, using a five-step scale. For risks and opportunities, the assessment was adjusted to align with the Group's existing evaluation system. Issues that were identified as being "on the borderline" of these thresholds were analysed individually, and the organisation then decided whether to include them in the catalogue of material issues or not.

The assessment involved representatives from management responsible for ESG, strategy, risk, compliance, human resources, health and safety, sales, purchasing, products, partner relations. A Client Ombudsman and a trade union representative were also engaged throughout the process. Additionally, external experts in environmental protection, social impact, and non-financial reporting supported the Group in conducting the materiality assessment.

To identify and assess impacts, risks, and opportunities, the Group's portfolio, including investments, loans, and other financial assets, was specifically analysed. This analysis enabled the Group to determine the extent to which its financial activities contribute to positive or negative impacts, such as greenhouse gas emissions, biodiversity impacts, or working conditions in the value chain. Additionally, environmental and social issues can directly affect the value of the bank's portfolio, presenting both risks and opportunities. Regulatory changes, climate-related risks, and evolving customer and investor expectations can influence asset valuation, credit risk levels, and the bank's reputation. The analysis focused on the 20 business activities (according to the codes in the Polish Classification of Business Activities) in which the Group has the largest share of funding, as well as the scale of the mortgage and leasing business.

For the Group, an essential element in identifying negative impacts is dialogue with stakeholders, primarily employees and key stakeholders, as part of the due diligence process.

Ensuring the completeness of the stakeholder list involved several steps. The process began with reviewing the list of stakeholders identified in the previous reporting process. In the next step, stakeholders were identified across various stakeholder groups.

Anonymous questionnaires and in-depth interviews were used to gather feedback and draw conclusions from stakeholders, helping to better understand the Group's impacts as well as associated risks and opportunities. The surveys included both closed and open-ended questions, covering all areas of sustainability. The issues addressed were identified based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Primarily, human rights outlined in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work were considered. During the analysis, special attention was given to considering issues relevant from an environmental perspective. A total of 249 responses were analysed from employees of the Alior Bank Capital Group. The 143 responses from external stakeholders included business and retail customers, shareholders, representatives of regulatory bodies, and representatives of non-governmental organisations.

To deepen the analysis, five interviews were conducted with representatives from the business partners, suppliers, and employees. Based on the results of the surveys and interviews, both negative and positive impacts of the bank, along with associated risks and opportunities, were identified. In the assessment of criteria such as scale, scope, irreversibility, and probability, particular attention was given to the relationship with specific human rights.



Individual clients were not included in the survey due to restrictions imposed by the Polish Financial Supervision Authority and GDPR. However, their interests were considered during the analysis through various methods, including the involvement of the Client Ombudsman, the analysis of issues reported to the complaints department, and the review of penalties imposed on the bank or investigations initiated by the Competition and Consumer Protection Office due to violations of consumer interests.

The Group is aware of its potential impact on climate change, biodiversity, and ecosystems, as well as the associated risks and opportunities, primarily through its financial products. A high-emissions climate scenario based on the Intergovernmental Panel on Climate Change's "Climate Change 2021: The Physical Science Basis" and the International Energy Agency's "Net Zero Emissions by 2050" scenario was analysed in detail. Based on this analysis, both physical and transition climate-related risks were identified. The time horizons for these risks are outlined in the table "Material Risks and Opportunities Identified by the Alior Bank Group in the Double Materiality Process" (for further information, including the scenario analysis, see SBM-3).

The Group assessed the identified environmental and social impacts based on criteria aligned with established standards: severity and probability for negative impacts, and scale, scope, and probability for positive impacts. A hierarchy of materiality was established using qualitative and quantitative thresholds. To determine these thresholds, the Group relied on studies by international organisations (e.g. the World Bank), industry best practices (primarily in the financial sector), competitor non-financial reports, sector studies, academic research, regulatory standards, and various analytical tools (e.g. Wage Indicator, Aqueduct Water Risk Atlas). Additionally, statistical data from sources such as the Central Statistical Office of Poland and Eurostat was considered.





Disclosure requirements in ESRS covered by the undertaking's sustainability statement

IRO-2

The entity identified information requiring disclosure on material impacts, risks, and opportunities by assigning them to thematic units during the double materiality assessment process and applying predefined thresholds.

List of the Disclosure Requirements complied with in preparing the sustainability statement

DR No.	Disclosure Requirement	Page No.
BP-1	General basis for preparation of the sustainability statements	4
BP-2	Disclosures in relation to specific circumstances	5
GOV-1	The role of the administrative, management and supervisory bodies	6
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	8
GOV-3	Integration of sustainability- related performance in incentive schemes	8
GOV-4	Statement on sustainability due diligence	9
GOV-5	Risk management and internal controls over sustainability reporting	9
SBM-1	Market position, strategy, business model(s) and value chain	10
SBM-2	Interests and views of stakeholders	16
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	18
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	28
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	30



DR No.	Disclosure Requirement	Page No.
E1-1	Transition plan for climate change mitigation	78
E1 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	18
E1 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	28
E1-2	Policies related to climate change mitigation and adaptation	78
E1-3	Actions and resources in relation to climate change policies Metrics and targets	79
E1-4	Targets related to climate change mitigation and adaptation	79
E1-5	Energy consumption and mix	79
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	80
E1-7	- GHG removals and GHG mitigation projects financed through carbon credits	83
E1-8	Internal carbon pricing	83
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	83
S1 SBM-2	Interests and views of stakeholders	16
S1 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	18
S1-1	Policies related to own workforce	85
S1-2	Processes for engaging with own workers and workers' representatives about impacts	88
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	89

S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	90
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	91
S1-6	Characteristics of the undertaking's employees	91
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	93
S1-8	Collective bargaining coverage and social dialogue	pominięto
S1-9	Diversity metrics	93
S1-10	Adequate wages	94
S1-11	Social protection	pominięto
S1-12	Persons with disabilities	pominięto
S1-13	Training and skills development metrics	94
S1-14	Health and safety metrics	95
S1-15	Work-life balance metrics	95
S1-16	Compensation metrics (pay gap and total compensation)	96
S1-17	Incidents, complaints and severe human rights impacts	pominięto
S2 SBM-2	Interests and views of stakeholders	16
S2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	18
S2-1	Policies related to value chain workers	97
S2-2	Processes for engaging with value chain workers about impacts	99
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	99



DR No.	Disclosure Requirement	Page No.
S2-4	Taking Action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions and approaches	100
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	100
S3-1	Policies related to affected communities	pominięto
S3-2	Processes for engaging with affected communities about impacts	pominięto
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	pominięto
S3-4	Taking action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions and approaches	pominięto
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	pominięto
S4 SBM-2	Interests and views of stakeholders	16
S4 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	18
S4-1	Policies related to consumers and end-users	101
S4-2	Processes for engaging with consumers and end-users about impacts	103
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	105
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and endusers, and effectiveness of those actions	106
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	107

G1 GOV-1	The role of the administrative, supervisory and management bodies	6
G1 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	28
G1-1	Corporate culture and business conduct policies and corporate culture	109
G1-2	Management of relationships with suppliers	pominięto
G1-3	Prevention and detection of corruption and bribery	113
G1-4	Confirmed incidents of corruption or bribery	115
G1-5	Political influence and lobbying activities	pominięto
G1-6	Payment practices	pominięto
G1 własny	Cybersecurity	116



List of datapoints in cross and topical standards that derive from other EU legislation

Disclosure Requirement	Datapoint No.	Datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page No.
ESRS 2 GOV-1	21 d	Board's gender diversity	x		x		6
ESRS 2 GOV-1	21 e	Percentage of board members who are independent			x		6
ESRS 2 GOV-4	30	Statement on due diligence	x				9
ESRS 2 SBM-1	40 d (i)	Involvement in activities related to fossil fuel activities	x	x	x		Not applicable
ESRS 2 SBM-1	40 d (ii)	Involvement in activities related to chemical production	x		x		Not applicable
ESRS 2 SBM-1	40 d (iii)	Involvement in activities related to controversial weapons	x		x		Not applicable
ESRS 2 SBM-1	40 d (iv)	Involvement in activities related to cultivation and production of tobacco			x		Not applicable
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				x	78
ESRS E1-1	16 g	Undertakings excluded from Paris-aligned Benchmarks		x	x		Not applicable
ESRS E1-4	34	GHG emission reduction targets	x	x	x		79
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	x				Not applicable
ESRS E1-5	37	Energy consumption and mix	x				79
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	x				Not applicable
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	x	x	x		80
ESRS E1-6	53-55	Gross GHG emissions intensity	x	x	x		80
ESRS E1-7	56	GHG removals and carbon credits				x	83
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			x		Not applicable
ESRS E1-9	66 a	Disaggregation of monetary amounts by acute and chronic physical risk		x			Not applicable
ESRS E1-9	66 c	Location of significant assets at material physical risk		x			Not applicable



Disclosure Requirement	Datapoint No.	Datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page No.
ESRS E1-9	67 c	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		x			Not applicable
ESRS E1-9	69	Degree of exposure of the portfolio to climate- related opportunities			x		Not applicable
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	x				Not applicable
ESRS E3-1	9	Water and marine resources	x				Not applicable
ESRS E3-1	13	Dedicated policy	x				Not applicable
ESRS E3-1	14	Sustainable oceans and seas	x				Not applicable
ESRS E3-4	28 c	Total water recycled and reused	x				Not applicable
ESRS E3-4	29	Total water consumption in m ³ per net revenue on own operations	x				Not applicable
ESRS 2 SBM 3-E4	16 a (i)	biodiversity sensitive areas	x				Not applicable
ESRS 2 SBM 3-E4	16 b	Impact on terrestrial ecosystems	x				Not applicable
ESRS 2 SBM 3-E4	16 c	Endangered species	x				Not applicable
ESRS E4-2	24 b	Sustainable land / agriculture practices or policies	x				Not applicable
ESRS E4-2	24 c	Sustainable oceans / seas practices or policies	x				Not applicable
ESRS E4-2	24 d	Policies to address deforestation	x				Not applicable
ESRS E5-5	37 d	Non-recycled waste	x				Not applicable
ESRS E5-5	39	Hazardous waste and radioactive waste	x				Not applicable
ESRS 2 SBM-3-S1	14 f	Risk of incidents of forced labour	x				18
ESRS 2 SBM-3-S1	14 g	Risk of incidents of child labour	x				18
ESRS S1-1	20	Human rights policy commitments	x				85



Disclosure Requirement	Datapoint No.	Datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page No.
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			x		86
ESRS S1-1	22	processes and measures for preventing trafficking in human beings	x				85
ESRS S1-1	23	workplace accident prevention policy or management system	x				86
ESRS S1-3	32 c	grievance/complaints handling mechanisms	x				86
ESRS S1-14	88 b i c	Number of fatalities and number and rate of work-related accidents	x		x		95
ESRS S1-14	88 e	Number of days lost to injuries, accidents, fatalities or illness	x				95
ESRS S1-16	97 a	Unadjusted gender pay gap	x		x		96
ESRS S1-16	97 b	Excessive CEO pay ratio	x				96
ESRS S1-17	103 a	Incidents of discrimination	x				Not applicable
ESRS S1-17	104 a	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	x		x		Not applicable
ESRS 2 SBM-3-S2	11 b	Significant risk of child labour or forced labour in the value chain	x				18
ESRS S2-1	17	Human rights policy commitments	x				97
ESRS S2-1	18	Policies related to value chain workers	x				97
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	x		x		97
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			x		97
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x				100
ESRS S3-1	16	Human rights policy commitments	x				Not applicable
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	x		x		Not applicable
ESRS S3-4	36	Human rights issues and incidents	x				Not applicable



Disclosure Requirement	Datapoint No.	Datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page No.
ESRS S4-1	16	Policies related to consumers and end-users	x				101
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x		101
ESRS S4-4	35	Human rights issues and incidents	x				106
ESRS G1-1	10 b	United Nations Convention against Corruption	x				109
ESRS G1-1	10 d	Protection of whistle- blowers	x				109
ESRS G1-4	24 a	Fines for violation of anti-corruption and anti-bribery laws	x		x		115
ESRS G1-4	24 b	Standards of anti- corruption and anti- bribery	x				115





Environmental information





Disclosures pursuant to Article 8 of the Regulation (EU) 2020/852 (Taxonomy Regulation)

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

	PLN million	Total environmentally sustainable assets by reference to turnover	KPI by reference to turnover (%)	KPI by reference to capital expenditure (%)	% coverage (over total assets)	% of assets excluded from the numerator for GAR calculation (Article 7(2) and (3) and Section I.1.2 of Annex V)	% of assets excluded from the denominator for GAR calculation (Article 7(I) and Section I.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	389,40	0,55%	0,60%	72,78%	22,31%	25,22%
Additional KPIs	GAR (flow)*	62,50	0,48%	0,48%	72,66%	11,90%	27,34%
	Trading book	N/A	N/A	N/A			
	Financial guarantees	31,45	3,18%	1,00%			
	Assets under management	N/A	N/A	N/A			
	Fees and commissions income	N/A	N/A	N/A	N/A		

* The key performance indicators were calculated as gross carrying amount of new exposure, i.e. new GAR assets.



PLN million		ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk	
		31.12.2023													
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)							
	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling			
GAR - covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation														
2	Financial undertakings														
3	Credit institutions														
4	Loans and advances														
5	Debt securities, including UoP														
6	Equity instruments														
7	Other financial corporations														
8	of which investment firms														
9	Loans and advances														
10	Debt securities, including UoP														
11	Equity instruments														
12	of which asset management companies														
13	Loans and advances														
14	Debt securities, including UoP														
15	Equity instruments														
16	of which insurance undertakings														
17	Loans and advances														
18	Debt securities, including UoP														
19	Equity instruments														
20	Non-financial undertakings														
21	Loans and advances														
22	Debt securities, including UoP														
23	Equity instruments														
24	Households														
25	of which loans collateralised by residential immovable property														
26	of which building renovation loans														
27	of which motor vehicle loans														
28	Local governments financing														
29	Housing financing														
30	Other local governments financing														
31	Collateral obtained by taking possession: residential and commercial immovable properties														
32	Other assets excluded from the numerator for GAR calculation (covered in the denominator)														
33	Financial and Non-financial undertakings														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations														
35	Loans and advances														
36	of which loans collateralised by commercial immovable property														
37	of which building renovation loans														
38	Debt securities														
39	Equity instruments														
40	Non-EU country counterparties not subject to NFRD disclosure obligations														
41	Loans and advances														
42	Debt securities														
43	Equity instruments														
44	Derivatives														
45	On demand interbank loans														
46	Cash and cash-related assets														
47	Other assets (e.g. goodwill, commodities etc.)														
48	Total GAR assets														
49	Other assets not covered for GAR calculation														
50	Central governments and Supranational issuers														
51	Central banks exposure														
52	Trading book														
53	Total assets														
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations															
55	Financial guarantees														
56	Assets under management														
57	Of which debt securities														
58	Of which equity instruments														



		s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31.12.2024												
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
PLN million		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Proceeds	Use of Proceeds	Of which enabling	Of which Proceeds	Use of Proceeds	Of which enabling	Of which Proceeds	Use of Proceeds	Of which enabling	Of which transitional	Of which enabling		
GAR - covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0,04	0,00	0,00	0,00	0,08	0,00	0,00	0,00	21014,72	424,19	0,00	19,14	10,22
2	Financial undertakings	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
3	Credit institutions	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
4	Loans and advances	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
5	Debt securities, including UoP	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
6	Equity instruments	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
7	Other financial corporations	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
8	of which investment firms	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
9	Loans and advances	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
10	Debt securities, including UoP	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
11	Equity instruments	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
12	of which asset management companies	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
13	Loans and advances									0,00	0,00	0,00	0,00	0,00
14	Debt securities, including UoP	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
15	Equity instruments	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
16	of which insurance undertakings	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
17	Loans and advances	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
18	Debt securities, including UoP	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
19	Equity instruments	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
20	Non-financial undertakings	0,04	0,00	0,00	0,00	0,08	0,00	0,00	0,00	240,29	63,40	0,00	19,14	10,22
21	Loans and advances	0,04	0,00	0,00	0,00	0,08	0,00	0,00	0,00	240,29	63,40	0,00	19,14	10,22
22	Debt securities, including UoP	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
23	Equity instruments	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
24	Households									20774,44	360,79	0,00	0,00	0,00
25	of which loans collateralised by residential immovable property									20405,13	360,79	0,00	0,00	0,00
26	of which building renovation loans									369,31	0,00	0,00	0,00	0,00
27	of which motor vehicle loans									0,00	0,00	0,00	0,00	0,00
28	Local governments financing	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
29	Housing financing	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
30	Other local governments financing	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
32	Other assets excluded from the numerator for GAR calculation (covered in the denominator)													
33	Financial and Non-financial undertakings													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations													
35	Loans and advances													
36	of which loans collateralised by commercial immovable property													
37	of which building renovation loans													
38	Debt securities													
39	Equity instruments													
40	Non-EU country counterparties not subject to NFRD disclosure obligations													
41	Loans and advances													
42	Debt securities													
43	Equity instruments													
44	Derivatives													
45	On demand interbank loans													
46	Cash and cash-related assets													
47	Other assets (e.g. goodwill, commodities etc.)													
48	Total GAR assets	0,04	0,00	0,00	0,00	0,08	0,00	0,00	0,00	21014,72	424,19	0,00	19,14	10,22
49	Other assets not covered for GAR calculation													
50	Central governments and Supranational issuers													
51	Central banks exposure													
52	Trading book													
53	Total assets	0,04	0,00	0,00	0,00	0,08	0,00	0,00	0,00	21014,72	424,19	0,00	19,14	10,22
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations														
55	Financial guarantees	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	49,68	9,87	0,00	0,00	0,00
56	Assets under management	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
57	Of which debt securities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
58	Of which equity instruments	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



PLN million		31.12.2023												
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which enabling
ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk		
GAR - covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation													
2	Financial undertakings													
3	Credit institutions													
4	Loans and advances													
5	Debt securities, including UoP													
6	Equity instruments													
7	Other financial corporations													
8	of which investment firms													
9	Loans and advances													
10	Debt securities, including UoP													
11	Equity instruments													
12	of which asset management companies													
13	Loans and advances													
14	Debt securities, including UoP													
15	Equity instruments													
16	of which insurance undertakings													
17	Loans and advances													
18	Debt securities, including UoP													
19	Equity instruments													
20	Non-financial undertakings													
21	Loans and advances													
22	Debt securities, including UoP													
23	Equity instruments													
24	Households													
25	of which loans collateralised by residential immovable property													
26	of which building renovation loans													
27	of which motor vehicle loans													
28	Local governments financing													
29	Housing financing													
30	Other local governments financing													
31	Collateral obtained by taking possession: residential and commercial immovable properties													
32	Other assets excluded from the numerator for GAR calculation (covered in the denominator)													
33	Financial and Non-financial undertakings													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations													
35	Loans and advances													
36	of which loans collateralised by commercial immovable property													
37	of which building renovation loans													
38	Debt securities													
39	Equity instruments													
40	Non-EU country counterparties not subject to NFRD disclosure obligations													
41	Loans and advances													
42	Debt securities													
43	Equity instruments													
44	Derivatives													
45	On demand interbank loans													
46	Cash and cash-related assets													
47	Other assets (e.g. goodwill, commodities etc.)													
48	Total GAR assets													
49	Other assets not covered for GAR calculation													
50	Central governments and Supranational issuers													
51	Central banks exposure													
52	Trading book													
53	Total assets													
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations														
55	Financial guarantees													
56	Assets under management													
57	Of which debt securities													
58	Of which equity instruments													



2. GAR sector information by reference to turnover

Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p		
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)					
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD			
		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]			
PLN million		Of which environmentally sustainable (CCM)		PLN million		Of which environmentally sustainable (CCA)		PLN million		Of which environmentally sustainable (WMR)		PLN million		Of which environmentally sustainable (CE)		PLN million		Of which environmentally sustainable (CE)	
1	C20.14	0,91	0,00			0,00	0,00			0,00	0,00			0,00	0,00				
2	C21.20	0,04	0,00			0,00	0,00			0,00	0,00			0,00	0,00				
3	D35.11	20,44	1,50			0,28	0,00			0,00	0,00			0,03	0,00				
4	D35.12	9,79	3,25			0,00	0,00			0,00	0,00			0,13	0,00				
5	E38.12	2,36	0,00			0,00	0,00			0,00	0,00			0,00	0,00				
6	F41.20	31,36	1,32			0,00	0,00			0,00	0,00			0,00	0,00				
7	F42.11	23,42	18,88			23,42	0,00			0,00	0,00			0,00	0,00				
8	J60.10	0,94	0,73			2,92	2,92			0,00	0,00			0,00	0,00				
9	M72.19	0,04	0,01			0,00	0,00			0,00	0,00			0,00	0,00				

Breakdown by sector - NACE 4 digits level (code and label)		q	r	s	t	u	v	w	x	y	z	aa	ab	
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		
		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		
PLN million		Of which environmentally sustainable (PPC)		PLN million		Of which environmentally sustainable (BIO)		PLN million		Of which environmentally sustainable (CCM + CCA + WMR + CE + PPC + BIO)				
1	C20.14	0,00	0,00			0,00	0,00			0,91	0,00			
2	C21.20	0,00	0,00			0,00	0,00			0,04	0,00			
3	D35.11	0,00	0,00			0,00	0,00			20,76	1,50			
4	D35.12	0,00	0,00			0,00	0,00			9,91	3,25			
5	E38.12	0,00	0,00			0,00	0,00			2,36	0,00			
6	F41.20	0,00	0,00			0,00	0,00			31,36	1,32			
7	F42.11	0,00	0,00			0,00	0,00			23,42	18,88			



		r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		31.12.2024												
		Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not for trading, eligible for GAR calculation	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	41,93%	0,78%	0,00%	0,00%	0,01%
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which asset management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	15,14%	3,73%	0,00%	0,00%	0,83%
21	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	15,14%	3,73%	0,00%	0,00%	0,83%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households									42,35%	0,74%	0,00%	0,00%	0,00%
25	of which loans collateralised by residential immovable property									96,15%	1,70%	0,00%	0,00%	0,00%
26	of which building renovation loans									100,00%	0,00%	0,00%	0,00%	0,00%
27	of which motor vehicle loans									-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	29,42%	0,55%	0,00%	0,00%	0,01%



		ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk	
		31.12.2023														
		Pollution prevention and control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)						
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional		Of which enabling		
	GAR - covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not for trading, eligible for GAR calculation	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	37,94%	0,40%	0,00%	0,00%	0,08%	59,02%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
12	of which asset management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
20	Non-financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	16,03%	5,76%	0,00%	0,00%	5,35%	0,98%	
21	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	16,03%	5,76%	0,00%	0,00%	5,35%	0,98%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
24	Households									38,28%	0,31%	0,00%	0,00%	0,00%	58,04%	
25	of which loans collateralised by residential immovable property									86,04%	0,72%	0,00%	0,00%	0,00%	23,42%	
26	of which building renovation loans									141,25%	0,00%	0,00%	0,00%	0,00%	0,63%	
27	of which motor vehicle loans									-	-	-	-	-	5,12%	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
29	Housing	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	29,47%	0,31%	0,00%	0,00%	0,06%	77,82%	



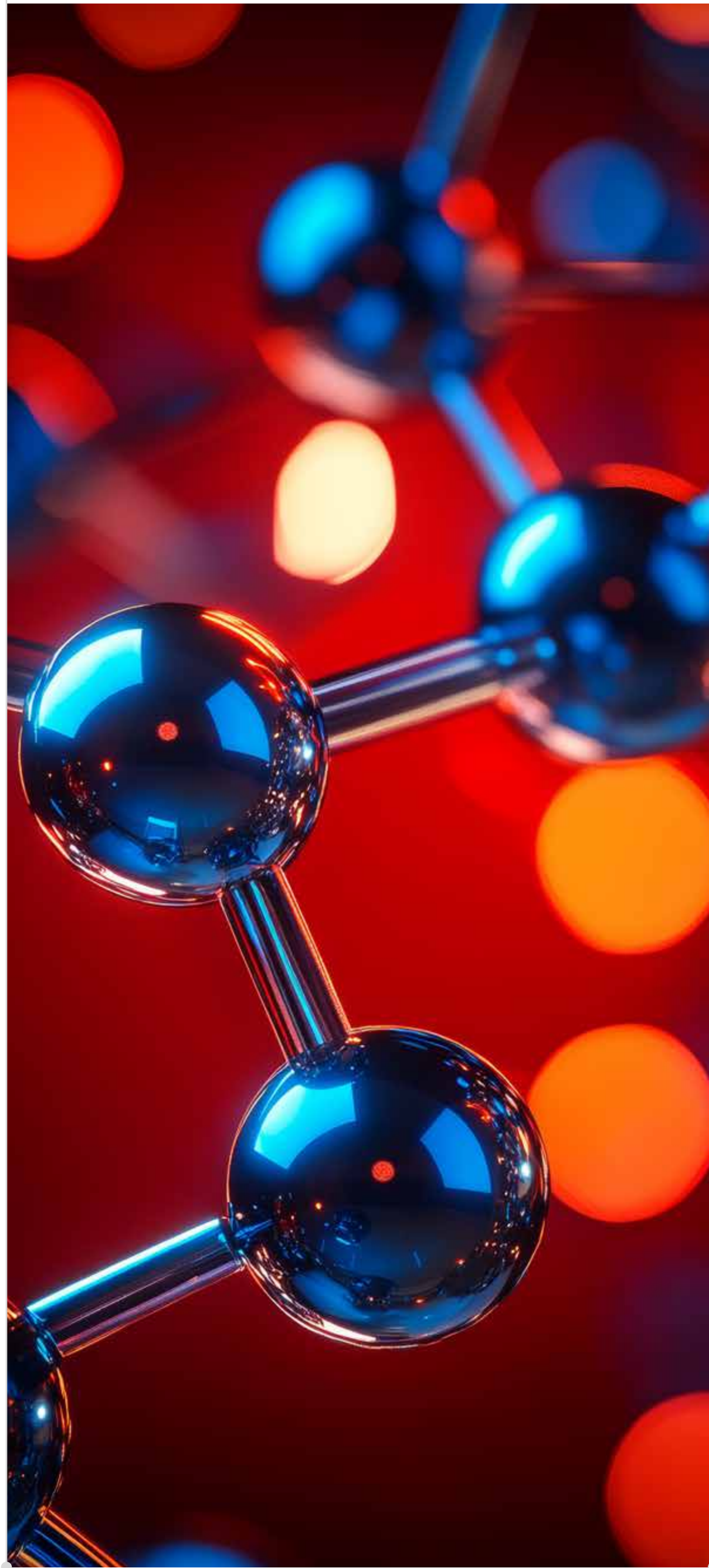
		ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk	
		31.12.2023														
		Pollution prevention and control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)						
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transition al		Of which enabling		
GAR - covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not for trading, eligible for GAR calculation	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	39,30%	0,73%	0,00%	0,00%	0,36%	59,02%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
12	of which asset management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
20	Non-financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	43,58%	26,04%	0,00%	0,00%	21,53%	0,98%	
21	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	43,58%	26,04%	0,00%	0,00%	21,53%	0,98%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
24	Households									39,27%	0,32%	0,00%	0,00%	0,00%	58,04%	
25	of which loans collateralised by residential immovable property									94,59%	0,79%	0,00%	0,00%	0,00%	23,42%	
26	of which building renovation loans									100,00%	0,00%	0,00%	0,00%	0,00%	0,63%	
27	of which motor vehicle loans									0,00%	0,00%	0,00%	0,00%	0,00%	5,12%	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
29	Housing	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	0,00%	
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	123,34%	2,28%	0,00%	0,00%	1,12%	18,81%	



		r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
		31.12.2024														
		Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)						Proportion of total covered assets
% (compared to flow of total eligible assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitiona		Of which enabling		
	GAR - covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not for trading, eligible for GAR calculation	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	26,92%	0,48%	0,00%	0,00%	0,00%	100,00%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-		-	-	-		-	-	-		-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-		-	-	-		-	-	-		-	-	-	
12	of which asset management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-		-	-	-		-	-	-		-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-		-	-	-		-	-	-		-	-	-	
20	Non-financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%	
21	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-		-	-	-		-	-	-		-	-	-	
24	Households									27,18%	0,49%	0,00%	0,00%	0,00%	100,00%	
25	of which loans collateralised by residential immovable property									98,46%	1,89%	0,00%	0,00%	0,00%	100,00%	
26	of which building renovation loans									100,00%	0,00%	0,00%	0,00%	0,00%	100,00%	
27	of which motor vehicle loans									-	-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	26,92%	0,48%	0,00%	0,00%	0,00%	100,00%	



		r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31.12.2024													
		Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				Proportion of total covered assets	
% (compared to flow of total eligible assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
GAR - covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not for trading, eligible for GAR calculation	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	26,94%	0,48%	0,00%	0,00%	0,00%	100,00%
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which asset management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	2,43%	0,00%	0,00%	0,00%	0,00%	100,00%
21	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	2,43%	0,00%	0,00%	0,00%	0,00%	100,00%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households									27,18%	0,49%	0,00%	0,00%	0,00%	100,00%
25	of which loans collateralised by residential immovable property									98,46%	1,89%	0,00%	0,00%	0,00%	100,00%
26	of which building renovation loans									100,00%	0,00%	0,00%	0,00%	0,00%	100,00%
27	of which motor vehicle loans									-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	26,94%	0,48%	0,00%	0,00%	0,00%	100,00%



Disclosures of Indicators Related to Nuclear Energy and Natural Gas Activities in Accordance with Annex XII to Regulation 2021/2178

Below, the Group presents disclosures related to activities described in sections 4.26 - 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in accordance with the scope defined in Templates 1-5 of Annex XII to Regulation 2021/2178.

Template I. Activities Related to Nuclear Energy and Natural Gas

Nuclear Energy Activities		
1.1	The undertaking is engaged in, funds, or is exposed to, research, development, demonstration, and deployment of innovative power generation facilities based on nuclear processes to produce energy with minimal fuel cycle waste.	NO
1.2	The undertaking is engaged in, funds, or is exposed to, construction and safe operation of new nuclear facilities for generation of electricity and/or process heat, including for district heating and industrial applications such as hydrogen production, and upgrades them using cutting-edge technology.	NO
1.3	The undertaking is engaged in safe operation and safety upgrading of, funds, or is exposed to, existing nuclear facilities that generate electricity or process heat, including for district heating and industrial applications such as hydrogen production from nuclear energy.	NO
Natural Gas Activities		
1.4	The undertaking is engaged in, funds, or is exposed to, construction or operation of power generation facilities using gaseous fossil fuels.	NO
1.5	The undertaking is engaged in, funds, or is exposed to, construction, upgrading and operation of combined heat/cooling energy and power generation facilities using gaseous fossil fuels.	YES
1.6	The undertaking is engaged in, funds, or is exposed to, construction, upgrading and operation of heat/cooling energy generation facilities using gaseous fossil fuels.	YES

**Template 2. Taxonomy-Aligned Business Activities (Denominator) in relation to turnover [PLN milion]**

Type of Business Activity	Amount and share (monetary amount and percentage share)						
	CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
2.1	Amount and share of taxonomy-aligned economic activities referred to in 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.2	Amount and share of taxonomy-aligned economic activities referred to in 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.3	Amount and share of taxonomy-aligned economic activities referred to in 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.4	Amount and share of taxonomy-aligned economic activities referred to in 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.5	Amount and share of taxonomy-aligned economic activities referred to in 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.6	Amount and share of taxonomy-aligned economic activities referred to in 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.7	Amount and share of other taxonomy-aligned economic activities not listed in 1–6 above in the denominator of applicable KPI	389,40	0,55%	386,48	0,54%	2,92	0,00%
2.8	Total applicable KPI	389,40	0,55%	386,48	0,54%	2,92	0,00%




Template 2. Taxonomy-Aligned Business Activities (Denominator) in relation to capital expenditure [PLN milion]

Type of Business Activity		Amount and share (monetary amount and percentage share)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
2.1	Amount and share of taxonomy-aligned economic activities referred to in 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.2	Amount and share of taxonomy-aligned economic activities referred to in 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.3	Amount and share of taxonomy-aligned economic activities referred to in 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.4	Amount and share of taxonomy-aligned economic activities referred to in 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.5	Amount and share of taxonomy-aligned economic activities referred to in 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.6	Amount and share of taxonomy-aligned economic activities referred to in 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
2.7	Amount and share of other taxonomy-aligned economic activities not listed in 1–6 above in the denominator of applicable KPI	424,19	0,00%	423,41	0,00%	0,78	0,00%
2.8	Total applicable KPI	424,19	0,00%	423,41	0,00%	0,78	0,00%



**Template 3. Taxonomy-Aligned Business Activities (Numerator) in relation to turnover [PLN million]**

Type of Business Activity	Amount and share (monetary amount and percentage share)						
	CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
3.1	Amount and share of taxonomy-aligned economic activities referred to in 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.2	Amount and share of taxonomy-aligned economic activities referred to in 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.3	Amount and share of taxonomy-aligned economic activities referred to in 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.4	Amount and share of taxonomy-aligned economic activities referred to in 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.5	Amount and share of taxonomy-aligned economic activities referred to in 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.6	Amount and share of taxonomy-aligned economic activities referred to in 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.7	Amount and share of other taxonomy-aligned economic activities not listed in 1–6 above in the numerator of applicable KPI	389,40	100,00%	386,48	100,00%	2,92	100,00%
3.8	Total amount and total share of taxonomy-aligned economic activities in the numerator of applicable KPI	389,40	100,00%	386,48	100,00%	2,92	100,00%



**Template 3. Taxonomy-Aligned Business Activities in relation to capital expenditure (Numerator) [PLN million]**

Type of Business Activity	Amount and share (monetary amount and percentage share)						
	CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
3.1	Amount and share of taxonomy-aligned economic activities referred to in 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.2	Amount and share of taxonomy-aligned economic activities referred to in 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.3	Amount and share of taxonomy-aligned economic activities referred to in 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.4	Amount and share of taxonomy-aligned economic activities referred to in 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.5	Amount and share of taxonomy-aligned economic activities referred to in 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.6	Amount and share of taxonomy-aligned economic activities referred to in 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the numerator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
3.7	Amount and share of other taxonomy-aligned economic activities not listed in 1–6 above in the numerator of applicable KPI	424,19	100,00%	423,41	100,00%	0,78	100,00%
3.8	Total amount and total share of taxonomy-aligned economic activities in the numerator of applicable KPI	424,19	100,00%	423,41	100,00%	0,78	100,00%



**Template 4. Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities in relation to turnover [PLN million]**

Type of Business Activity		Amount and share (monetary amount and percentage share)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
4.1	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
4.2	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
4.3	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
4.4	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,00	0,00%	0,00	0,00%	0,00	0,00%
4.5	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	1,32	0,01%	1,11	0,01%	0,21	0,89%
4.6	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI	0,07	0,00%	0,07	0,00%	0,00	0,00%
4.7	Amount and share of other taxonomy-eligible taxonomy-non-aligned economic activities not listed in 1–6 above in the denominator of applicable KPI	20499,58	99,99%	20476,09	99,99%	23,49	99,11%
4.8	Total amount and total share of taxonomy-eligible taxonomy-non-aligned economic activities in the denominator of applicable KPI	20500,97	100,00%	20477,27	99,88%	23,70	0,12%

**Template 4. Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities in relation to capital expenditure [PLN million]**

Type of Business Activity	Amount and share (monetary amount and percentage share)											
	CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)							
	Amount	%	Amount	%	Amount	%						
4.1	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI						0,00	0,00%	0,00	0,00%	0,00	0,00%
4.2	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI						0,00	0,00%	0,00	0,00%	0,00	0,00%
4.3	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI						0,00	0,00%	0,00	0,00%	0,00	0,00%
4.4	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI						7,12	0,03%	7,12	0,03%	0,00	0,00%
4.5	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI						3,27	0,02%	3,27	0,02%	0,00	0,00%
4.6	Amount and share of taxonomy-eligible taxonomy-non-aligned economic activities referred to in 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139 in the denominator of applicable KPI						0,80	0,00%	0,80	0,00%	0,00	0,00%
4.7	Amount and share of other taxonomy-eligible taxonomy-non-aligned economic activities not listed in 1–6 above in the denominator of applicable KPI						20578,46	100,38%	20551,75	100,36%	26,71	112,67%
4.8	Total amount and total share of taxonomy-eligible taxonomy-non-aligned economic activities in the denominator of applicable KPI						20589,65	100,00%	20562,94	99,87%	26,71	0,13%



Template 5. Non-Taxonomy-Eligible Business Activities in relation to turnover [PLN million]

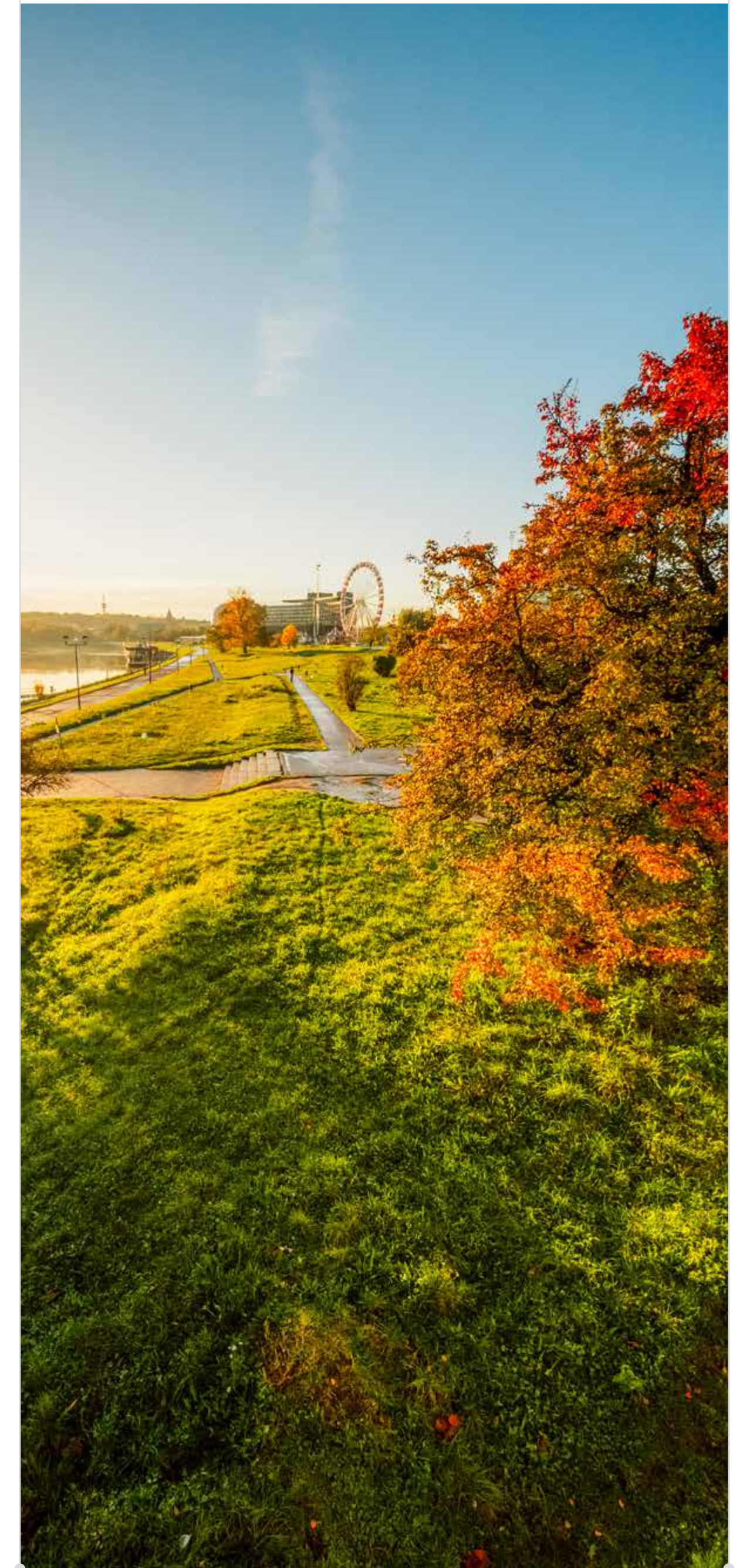
Type of Business Activity		Amount	Percentage share
5.1	Amount and share of the economic activities referred to in Line 1 of Template 1, which is taxonomy-non-eligible activity under 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.2	Amount and share of the economic activities referred to in Line 2 of Template 1, which is taxonomy-non-eligible activity under 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.3	Amount and share of the economic activities referred to in Line 3 of Template 1, which is taxonomy-non-eligible activity under 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.4	Amount and share of the economic activities referred to in Line 4 of Template 1, which is taxonomy-non-eligible activity under 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.5	Amount and share of the economic activities referred to in Line 5 of Template 1, which is taxonomy-non-eligible activity under 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.6	Amount and share of the economic activities referred to in Line 6 of Template 1, which is taxonomy-non-eligible activity under 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.7	Amount and share of other taxonomy-non-eligible economic activities not listed in 1-6 above in the denominator of applicable KPI	50118,58	70,58%
5.8	Total amount and total share of taxonomy-non-eligible economic activities in the denominator of applicable KPI	50118,58	70,58%





Template 5. Non-Taxonomy-Eligible Business Activities in relation to capital expenditure [PLN million]

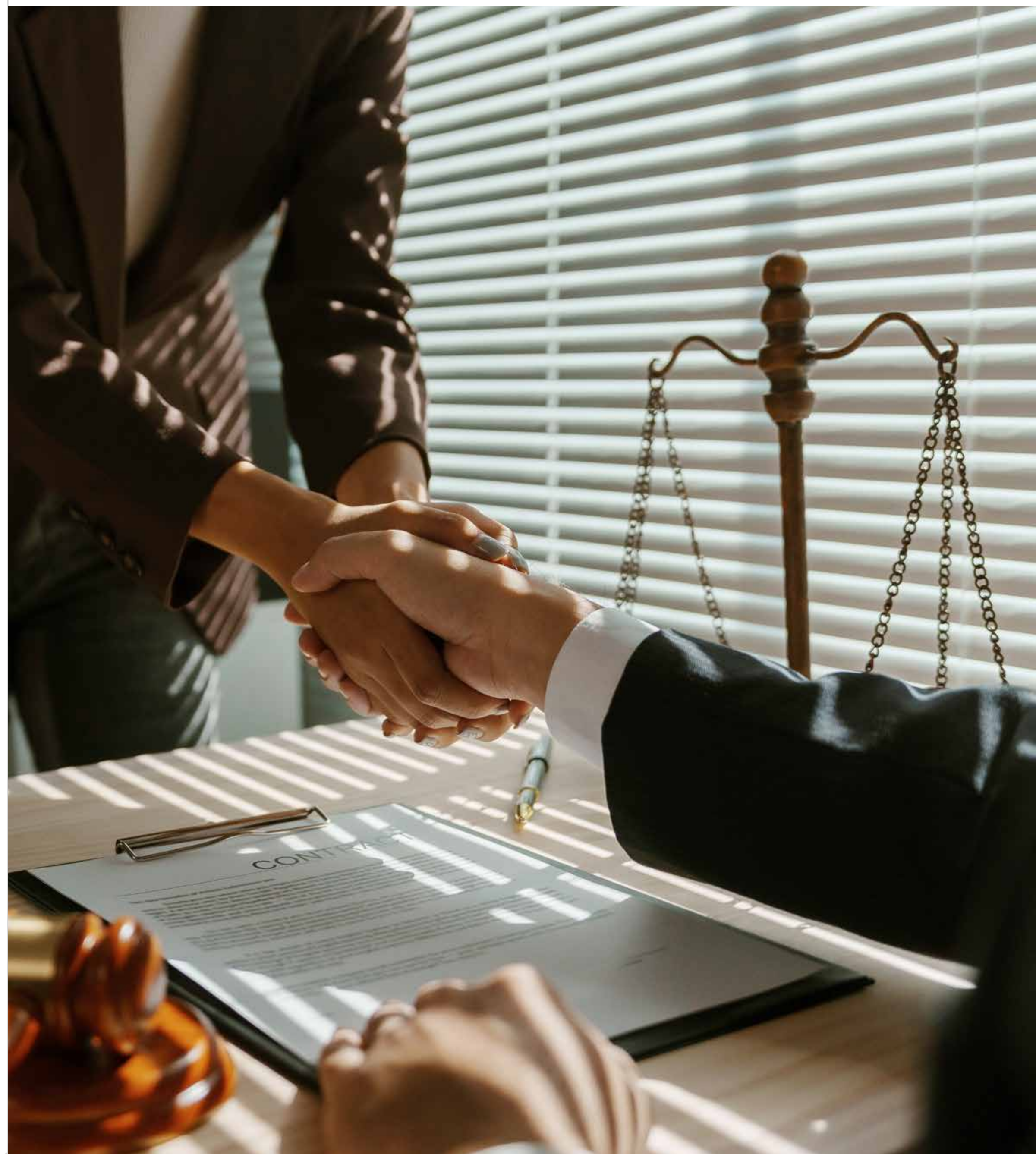
Type of Business Activity		Amount	Percentage share
5.1	Amount and share of the economic activities referred to in Line 1 of Template 1, which is taxonomy-non-eligible activity under 4.26 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.2	Amount and share of the economic activities referred to in Line 2 of Template 1, which is taxonomy-non-eligible activity under 4.27 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.3	Amount and share of the economic activities referred to in Line 3 of Template 1, which is taxonomy-non-eligible activity under 4.28 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.4	Amount and share of the economic activities referred to in Line 4 of Template 1, which is taxonomy-non-eligible activity under 4.29 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.5	Amount and share of the economic activities referred to in Line 5 of Template 1, which is taxonomy-non-eligible activity under 4.30 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.6	Amount and share of the economic activities referred to in Line 6 of Template 1, which is taxonomy-non-eligible activity under 4.31 of Annex I and II to Delegated Regulation (EU) 2021/2139, in the denominator of applicable KPI	0,00	0,00%
5.7	Amount and share of other taxonomy-non-eligible economic activities not listed in 1-6 above in the denominator of applicable KPI	49994,38	0,00%
5.8	Total amount and total share of taxonomy-non-eligible economic activities in the denominator of applicable KPI	49994,38	0,00%





The 2024 disclosures for the EU Taxonomy templates have been prepared based on the following regulations:

- Regulation 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (“EU Taxonomy”),
- Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives,
- Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation 2020/852 by specifying the content and presentation of information on sustainable economic activity to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU, and specifying the methodology to comply with that disclosure obligation (“Disclosures Regulation”),
- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives,



- Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

The above regulations impose a variety of reporting obligations on credit institutions. In 2024, the Bank for the first time made full disclosures for 2023 under the EU Taxonomy in compliance with the guidelines set out in the Disclosures Regulation (2021/2178). In preparing this year’s disclosures, the Bank took into account the guidelines and interpretations contained in all published EU Commission Notices. However, the implementation of some of the new guidelines was not possible due to the short period between their publication and the release of this Statement. In its disclosures, the Alior Bank Group considered the following environmental objectives:



- Climate Change Mitigation (CCM)
- Climate Change Adaptation (CCA)
- Sustainable use and protection of water and marine resources (WMR)
- Transition to a circular economy (CE)
- Prevention and control of pollution (PPC)
- Protection and restoration of biodiversity and ecosystems (BIO)

The Green Asset Ratio (GAR) represents the percentage of assets related to EU Taxonomy-compliant business activities in relation to total covered assets.

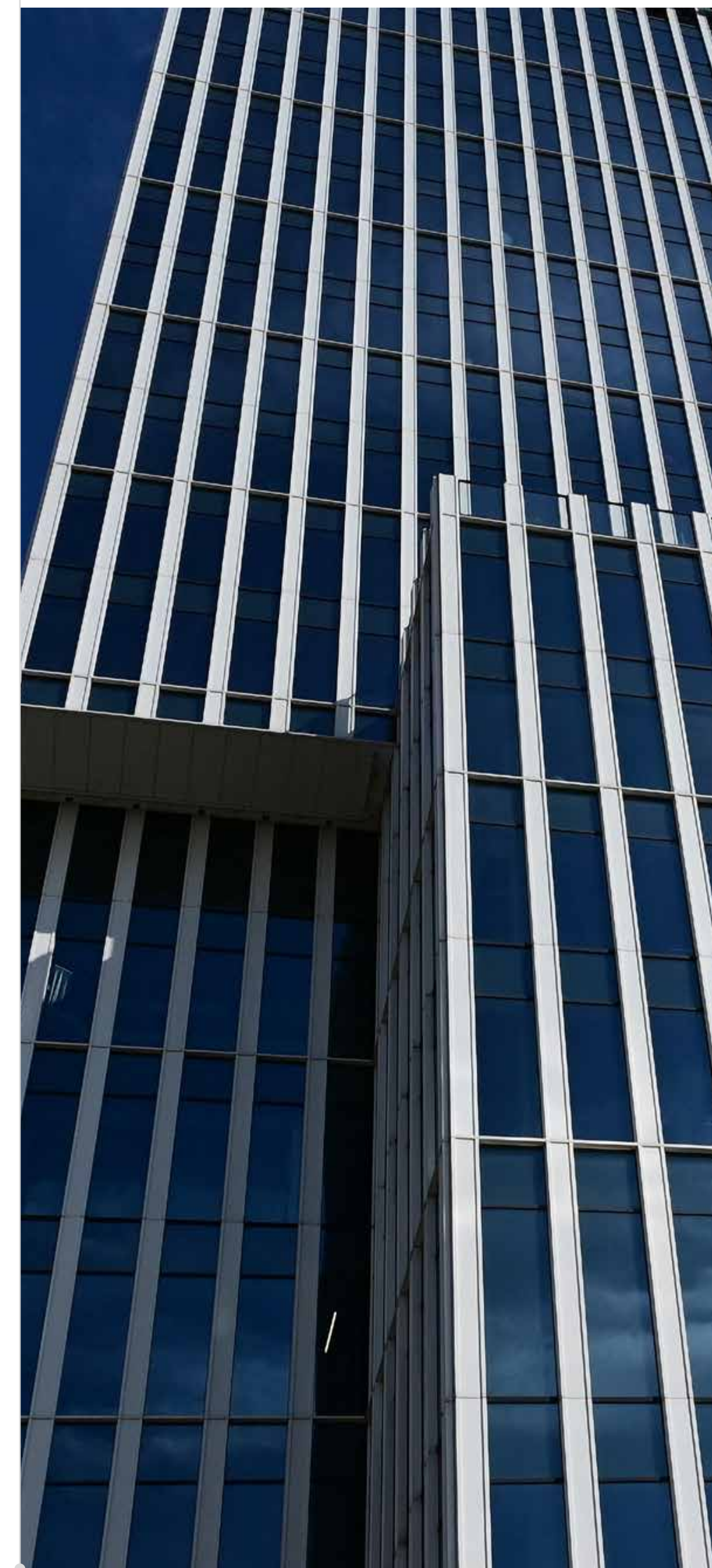
The Bank discloses the relevant key performance indicators based on the scope of prudential consolidation defined in accordance with Title II, Chapter 2, Section 2 of Regulation (EU) No. 575/2013. As of December 31, 2024, the Bank's scope of prudential consolidation includes Alior Bank S.A. and Alior Leasing sp. z o.o. Group, whose loans and advances are reported under the heading "SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations," according to the classification of leasing clients.

The Bank did not have any exposures from credit/loan, debt or equity instruments to financial institutions subject to sustainability reporting obligations under the Directive on Corporate Sustainability Reporting (CSRD).

Exposures from credit/loan, debt or equity instruments in the context of financing provided to clients required to publish non-financial information under the Directive on Corporate Sustainability Reporting (CSRD), the list of these clients in the banking system was verified by comparing it with data from the BIK ESG Platform and the InStrat Foundation's list of companies subject to the CSRD. Additionally, data from the BIK ESG Platform was used for analysis. The assessment of financing in terms of taxonomy eligibility and taxonomy alignment was based on indicators disclosed in clients' sustainability reports. In its analysis, the Bank relied on the latest available sustainability reports published by its clients in 2023.

The exposure size to financial and non-financial enterprises not subject to the obligation to publish information on sustainability reporting has been determined based on an analysis of internal data.

The definition of households used in calculating the EU Taxonomy indicators was consistent with that used for financial reporting purposes. Disclosures of taxonomy-eligible financing were prepared based on the characteristics of the products offered to clients. When classifying mortgage loans as aligned with the EU Taxonomy, those that met the established criteria for significant impact (for activity 7.7 Acquisition and ownership of buildings) were considered, based on an analysis of data included in the central register of building energy performance, thresholds for primary energy demand, in accordance with information published by the Ministry of Development and Technology, and in line with the principle of „do no significant harm“ to climate change adaptation, based on data from the Cenatorium database. The analysis did not cover compliance with minimum safeguards.





The Bank did not separately report exposure to financing activities related to local authorities. As defined in Section 1.2.1.4 of Annex V to the Disclosures Regulation (2021/2178), the Bank's business model does not significantly rely on public housing financing. Additionally, in reference to Section 15 of the Commission Notice of 21 December 2023, local government financing is excluded from the numerator for GAR calculation. The Bank does not hold collaterals obtained by taking possession of residential or commercial properties.

Pursuant to the Disclosures Regulation, assets excluded from the calculation of the Green Asset Ratio include: exposures to central governments and supranational issuers, exposures to central banks, and the trading book.

The Bank's trading book does not contain debt securities or equity instruments that must be reported by

1. financial corporations,
2. non-financial corporations and,
3. financial and non-financial corporations, including SMEs and non-financial corporations, and non-EU country counterparties.

The Bank did not independently verify the minimum safeguards within the taxonomy disclosures for 2024 due to the absence of reported target-financed activities classified as aligned with the Taxonomy in the business client sector.

The assessment of minimum safeguards in the context of individual clients should focus on producers and suppliers of goods and services they purchase. These guidelines were issued on 8 November 2024 in the Commission Notice C/2024/6691, and as a result, the Group did not have the required information to assess minimum safeguards for this portfolio. Due to the lack of available information and the insufficient time to adapt to the new guidelines in the 2024 reporting, the verification of minimum safeguards was not conducted for mortgage loans secured by residential real estate for individual clients. Therefore, the Group applied the same approach as in the previous year to the retail portfolio, as the available guidelines indicated that the assessment of minimum safeguards does not apply to individual clients.

- Explanations regarding the nature and objectives of the business activities in line with the EU Taxonomy and the development of these activities over time:
- The Group's activities in line with the EU Taxonomy primarily involved providing loans to households secured by residential real estate (over 90% of the eligible assets), and, to a lesser extent, loans to non-financial enterprises.

- This report includes a correction of an error regarding the position in Template 1, where exposures of companies within the Bank Group were reported. In last year's report, loans and advances provided by Alior Leasing Sp. z o.o. Group were reported under the „Financial undertakings“ section. The change in presentation has no impact on the reported green assets ratio for 2023.
- Additionally, this report includes a change resulting from the interpretation of the EU Taxonomy requirements. In last year's report, under Template 1, Box 55 „Financial Guarantees“ included guarantees granted to companies subject to the sustainability reporting obligation under the NFRD directive. In this year's report, the “total [gross] carrying amount” section includes all guarantees provided by the Bank, categorised by environmental purpose, based on guarantees issued to companies covered by the CSRD.
- Compared to the previous year, no changes were made to the approach for qualifying activities in line with the EU Taxonomy. The principles, methodology, and areas covered by the EU Taxonomy remain unchanged, and the Bank has not introduced any modifications or expansions to these activities compared to the previous period.

Alior Bank has not specified detailed objectives regarding the financing that qualifies as compliant with the EU Taxonomy.

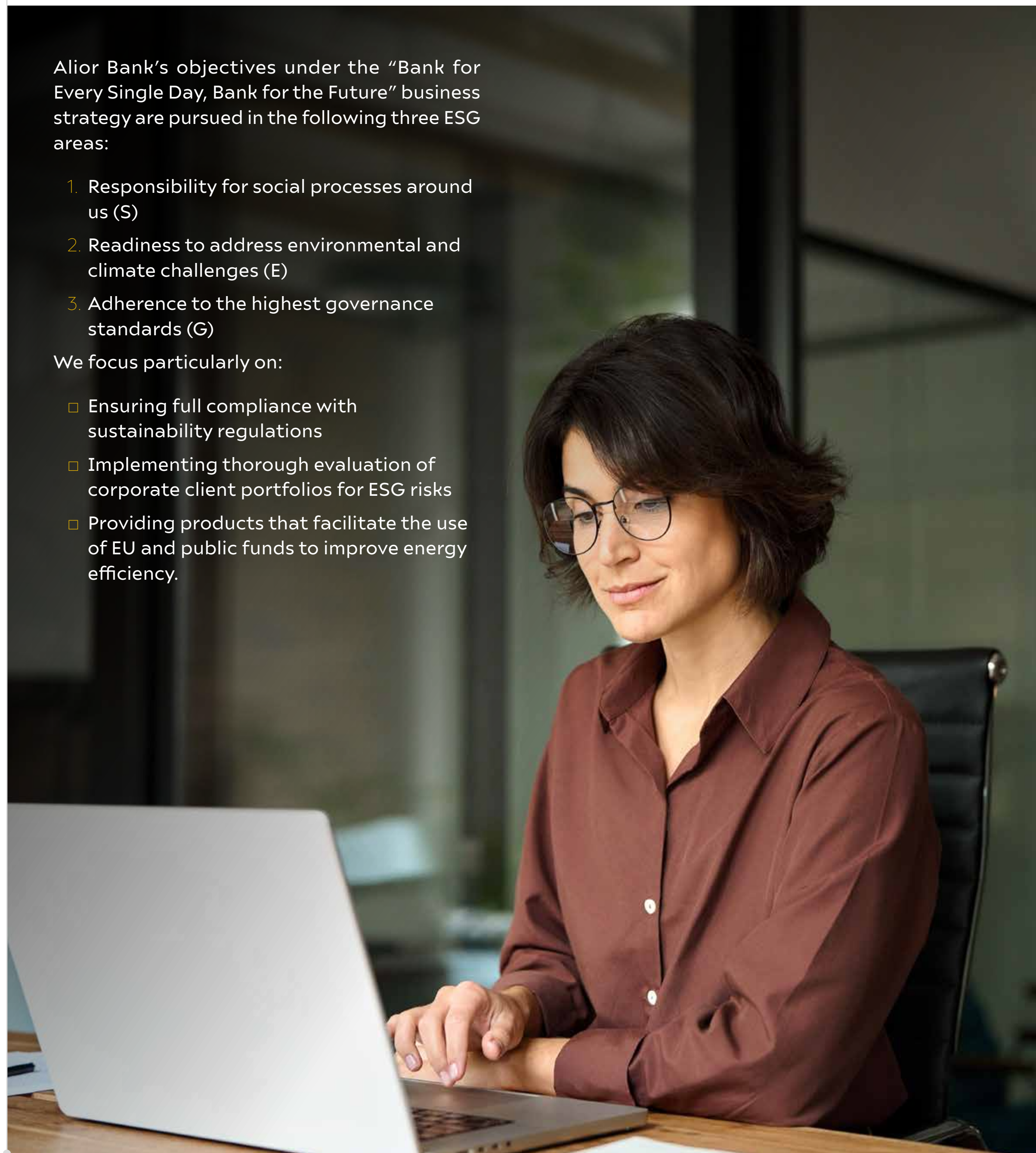


Alior Bank's objectives under the "Bank for Every Single Day, Bank for the Future" business strategy are pursued in the following three ESG areas:

1. Responsibility for social processes around us (S)
2. Readiness to address environmental and climate challenges (E)
3. Adherence to the highest governance standards (G)

We focus particularly on:

- Ensuring full compliance with sustainability regulations
- Implementing thorough evaluation of corporate client portfolios for ESG risks
- Providing products that facilitate the use of EU and public funds to improve energy efficiency.



Only a small portion of the Bank's loan portfolio consists of large companies subject to the CSRD. The business client segment is predominantly composed of sole proprietorships and small and medium-sized enterprises. In the individual client segment, Alior Bank's distinctive feature is its consumer finance segment. In addition to the data required by the EU Taxonomy, the exposure within households will be reported under the voluntary indicators disclosed above.

In line with the European Banking Federation's January 2024 letter, the Bank has prepared voluntary disclosures to demonstrate its commitment to financing climate change mitigation in 2023. For consistency, disclosures have been made on a gross carrying amount basis. Data was sourced from the Data Warehouse based on banking reports. In terms of mortgages in the individual client segment, in accordance with Commission Delegated Regulation (EU) 2021/2139, for residential buildings built before 31 December 2020 this is 15% of the most energy-efficient buildings, as per the information provided by the Ministry of Development and Technology. For residential buildings constructed after 31 December 2020, the criterion is primary energy consumption which must be 10% lower than the threshold set for near-zero energy buildings.

Voluntary disclosure for the consumer finance segment:

- Financing of solar power systems in the Consumer Finance segment: PLN 237,962,214

Voluntary disclosure for mortgage financing:

- Mortgage loans in the individual client segment intended to finance properties that meet the energy efficiency criterion: PLN 176,253,598.47

Voluntary disclosure of renewable energy (RES) financing in the business customer segment:

- RES financing in the business client segment: PLN 164,078,479.78





CLIMATE CHANGE

ESRS E1

Transition plan for climate change mitigation

E1-1

In 2024, the Alior Bank Group did not have a transformation plan in place to mitigate climate change. However, the Group plans to develop and publish a decarbonisation plan for its operations in the coming years.

Policies related to climate change mitigation and adaptation

E1-2

In 2024, the Alior Bank Group companies did not have uniform policies related to climate change mitigation and adaptation.

Alior Bank

Alior Bank has been implementing its 2023-2024 strategy. The highest level responsible for implementing the strategy is the management board. The environmental section of the document outlines the following objectives:

- developing the Bank's own zero emission energy sources, including a solar power system by the Data Centre in Krakow
- reducing the consumption of energy, paper, and plastics
- measuring Scope 1 and Scope 2 emissions, and initiating calculations for Scope 3.

In Q4 2024, the Alior Bank S.A. Sustainable Financing Policy, which defines the Framework for Sustainable Financing at Alior Bank S.A., was adopted by a resolution of the Management Board. Sustainable financing provided by the Bank is allocated to projects that contribute to achieving specific environmental including: climate change mitigation; climate change adaptation; sustainable use and protection of water and marine resources; transition to a circular economy; pollution prevention and control; and protection and restoration of biodiversity and ecosystems or social objectives. The Bank aims to ensure that the projects financed do not negatively impact sustainability factors and that the companies receiving sustainable financing adhere to good management and corporate governance practices. The Bank is committed to publishing annual allocation reports and will strive to publish annual reports on the expected and achieved impact (effect) of financing, ensuring that impact reports include qualitative indicators. Where possible, the Bank will disclose quantitative metrics along with a description of key assumptions and methodologies used for measurement.

In 2024, Alior Bank required its suppliers to comply with the Alior Bank S.A. Supplier Code of Ethics. The Code sets out the Bank's expectations that suppliers, in specific cases related to the scale and nature of their business, systematically manage the environmental impact of their activities, including greenhouse gas emissions.

Alior Leasing

Alior Leasing plans to develop an ESG strategy that will address, among other aspects, climate-related issues. Work on the ESG strategy and decarbonisation plan is scheduled to begin in Q1 2025.





Actions and resources in relation to climate change policies

E1-3

In 2024, the Alior Bank Group did not take any action related to climate change mitigation and adaptation. Its member companies did not incur significant operating or investment expenses for such actions.

Targets related to climate change mitigation and adaptation

E1-4

In 2024, the Alior Group did not have any common targets for climate change mitigation and adaptation.

Alior Bank

Alior Bank's targets in this regard are outlined in the 2023-2024 Strategy and disclosed in this statement under the "Policies related to climate change mitigation and adaptation" section. The Bank has not adopted specific metrics for these targets. Key performance indicators for ESG areas will be included in the new strategy that Alior Bank plans to publish in 2025. Simultaneously, the Bank intends to set targets for the decarbonisation of its operations.

Alior Leasing

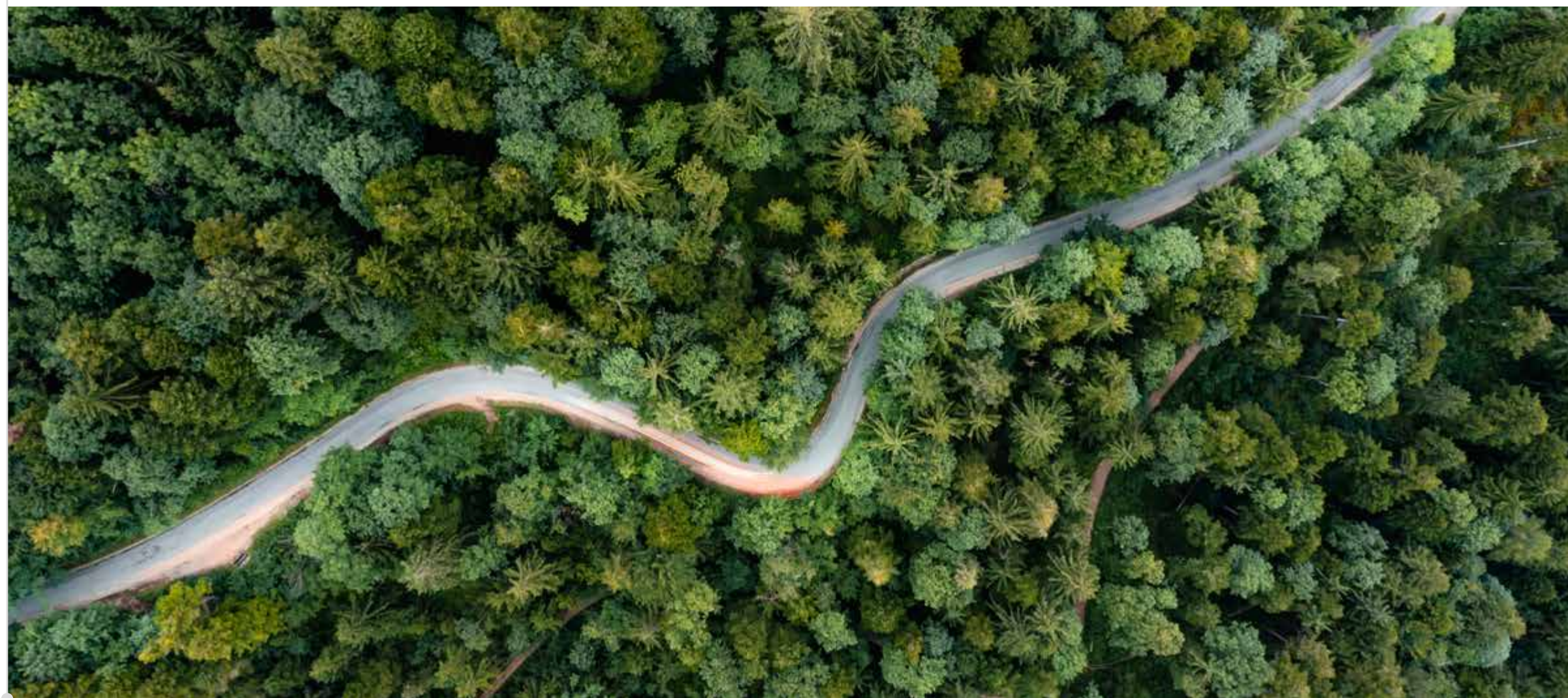
Alior Leasing has not established any climate change mitigation and adaptation targets.

Energy consumption and mix

E1-5

Information on energy consumption and energy mix

Energy consumption and energy mix	Unit	2024
Fuel consumption from coal and coal products	MWh	0
Fuel consumption from crude oil and petroleum products	MWh	13,619
Fuel consumption from natural gas	MWh	1,307.66
Fuel consumption from other fossil sources	MWh	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	22,809.06
Total fossil energy consumption	MWh	37,735.66
Share of fossil sources in total energy consumption	%	100
Consumption from nuclear sources	MWh	0
Share of consumption from nuclear sources in total energy consumption	%	0
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	0
Consumption of self-generated non-fuel renewable energy	MWh	0
Total renewable energy consumption	MWh	0
Share of renewable energy in total energy consumption	%	0
Total energy consumption	MWh	37,735.36





Gross Scopes 1, 2, 3 and Total GHG emissions

E1-6

In 2024, the Alior Bank Group calculated its carbon footprint for the first time. The process applied two calculation methodologies: PCAF and GHG Protocol, and employed emission databases, including KOBIZE, Defra and PCAF for the calculation of the portfolio emissions.

The analysis of the assets and activities of the companies within the Group, as well as their estimated contribution to the total carbon footprint in Scope 1 and 2, indicated the possibility of excluding companies other than the largest ones, namely the Alior Bank and Alior Leasing, from the emission calculation. Both the energy consumption and the estimated emissions of the other companies represent an insignificant portion of the total emissions (below 5%). Scope 1 and Scope 2 cover all activities related to direct and indirect emissions from Alior Bank and Alior Leasing.

For Scope 3, emissions were estimated for all categories deemed relevant to the Group. Similar to Scope 1 and 2, in Scope 3, the value chain of Alior Bank and Alior Leasing was considered, with the proportional contribution of other entities within the Group to Scope 3 emissions being estimated as immaterial. Within the material categories of Scope 3, namely category 15 Investments and category 13 Leasing by lessors, the other companies in the Group do not generate any emissions, as they do not have investment, credit, or leasing portfolios (in these categories, the emission calculation includes all relevant assets of the Group). Other categories within Scope 3 were excluded as immaterial based on the estimated share of emissions below 5% of the Group's total emissions. An additional qualitative criterion was the low quality of the data used for the emission estimates or the irrelevance of the category to the nature of the Group's activities.

The calculation did not include assets within the value chain, particularly assets/investments managed by the Group but not recognized on the Group's balance sheet, such as assets managed by the Group's investment funds.

Alior Bank Group's 2024 carbon footprint

Scope 1 Direct emissions	Emissions [tCO2]
Fuel consumption in buildings	382.61
Refrigerant consumption	68.96
Fleet	3,288.66
Scope 2 Indirect emissions	Emissions [tCO2]
Electricity (location-based method)	11,041.81
Electricity (market-based method)	11,075.25
District heating	1,765.29
Scope 1 + 2 [location-based method]	16,547.33
Scope 1 + 2 [market-based method]	16,580.77

Zakres 3 Emisje pośrednie	Emisje [tCO2]
Category 13 Leased assets	4,687,504.21
Category 13 Biogenic emissions	377.73
Category 15 Investments	3,409,240.49
Business Loans	1,819,144.71
Project Finance	182,736.05
Commercial Real Estate	18,226.49
Mortgages	200,343.27
Motor vehicle loans	223,866.28
Sovereign debt	964,923.70
Scope 3	8,096,744.70
Scope 1 + 2 + 3 [location-based method]	8,113,292.03
Scope 1 + 2 + 3 [market-based method]	8,113,325.47
Scope 1 + 2 + 3 Emission intensity [location-based method] [tCO2/mIn PLN]	944.91
Scope 1 + 2 + 3 Emission intensity [market-based method] [tCO2/mIn PLN]	944.91



The Alior Bank Group has established a carbon footprint calculation methodology aligned with regulations, guidelines, and standards. The regulatory framework considered in this methodology is continuously reviewed and validated.

Scope 1 carbon footprint includes:

- natural gas consumption – the calculation considers data on the number of facilities using natural gas and the volume consumed. CO2 emissions are determined using physical conversion factors and data from the National Centre for Emissions Management (KOBIZE).
- heating oil consumption – emissions from diesel combustion in buildings, primarily for power generator operation. Calculations are based on density values specified in the current Regulation of Minister of Climate and Environment on Quality Requirements for Liquid Fuels, along with fuel type and emissions data from the latest KOBIZE reports.
- refrigerant usage – emissions from refrigerant leakage are based on the volume of refrigerant refilled or replaced. The calculation considers the quantity of refrigerant used and its corresponding Global Warming Potential (GWP) values.
- fuel consumption from company cars - the amount of fuel consumed is used to calculate emissions fuel (petrol, diesel and LPG) and the corresponding KOBIZE and DEFRA factors.

Scope 2 carbon footprint includes:

- electricity consumption – emissions from electricity use are calculated based on the emission intensity of Poland’s power system. This is based on the current data provided by KOBIZE.
- district heating consumption – emissions from district heating are determined using the benchmark for the national district heating system. The benchmark is calculated by dividing CO2 emissions (kg) and the volume of heat produced, based on data from the KOBIZE database.

Emissions from electricity and district heating are calculated using two methodologies: a location-based approach which uses benchmarks from the KOBIZE database, and a market-based approach which relies on benchmarks provided by the energy supplier and district heating provider.

Data for calculating scope 3 in the context of the primary data:

- Category 13: In this category, data on average annual mileage, fuel type, vehicle make and model and number of contracts were obtained from Alior Leasing’s systems.
- Category 15 by asset class:
 - Business Loans - data on the amount owed on the last day of the year and sector codes were obtained from the banks’ internal systems.
 - Project Finance - data on the amount of debt as at the last day of the year and sector codes were obtained from internal banking systems.

- Mortgages - information on property type, debt amount as at the last day of the year, property valuation, area, primary energy were mostly taken from internal banking systems.
- Commercial Real Estate - information on property type, amount owed on the last day of the year, property valuation and area was taken from internal banking systems.
- Motor Vehicle Loans - data on the value of assets and the amount of debt as at the last day of the year was taken from Alior Leasing’s internal systems.
- Sovereign Debt - information on the nominal values of government bonds was extracted from internal banking systems.

Primary data:

Asset class	Emissions [tCO2e]	Total Scope 3 emissions [tCO2]	% of Scope 3 emissions
Business Loans CSRD	264,058		3.26%
Mortgages	200,343.27	8,096,744.70	2.47%
Commercial Real Estate	18,226.49		0.23%
Contribution of primary data [%]			5.96%



Scope 3 includes:

- Category 13: Leased Assets. This category covers Alior Leasing's portfolio of vehicles, machinery, and equipment. The portfolio includes both internal combustion and electric vehicles. As for machinery and equipment, the majority run on electric power, with some using combustion engines. Vehicle emissions were calculated based on annual mileage, average fuel consumption, and the type of fuel used.
- For machinery and equipment, emissions were calculated based on fuel consumption or estimated electricity usage derived from operating power, depending on the type of machine.

Emissions in this category were calculated in accordance with the GHG Protocol methodology and benchmarks specified in the National Inventory Report. Data on operating power or average fuel consumption was sourced from publicly available sources.

- Category 15: Investments. Calculations were performed in accordance with the PCAF methodology and its set of indicators. The following asset groups were included in this category:
 - Business Loans (Working Capital Facilities): This group includes all credit limits granted to finance day-to-day operations. The calculation is based on the debt amount on the last day of the year. The emission benchmark for each credit limit was sourced from the PCAF database by matching it to the indebted entities based on PKD (Polish Classification of Business Activities) codes. For clients subject to the CSRD from 2024 onwards, data for the calculation was sourced from the BIK ESG Platform, and the calculation was based on the debt amount on the last day of the year and EVIC.

- Project Finance (Investment Loans): The calculation considers the amount of debt as of the last day of the year and emission benchmarks sourced from the PCAF database, matched to the indebted entities based on PKD codes.
- Mortgages (Mortgage Loans): The calculation is based on the debt amount on the last day of the year and the value of the property. To calculate the final emissions from the loan, the energy consumption of the property and its associated carbon emissions were considered. The indicators were taken from the PCAF database.
- Commercial Real Estate (Commercial Real Estate Loans): The calculation is based on the debt amount as of the last day of the year, the value of the property, its energy consumption and emissions. The indicators were taken from the PCAF database.
- Motor Vehicle Loans: This category covers all loans granted for motor vehicles. The calculation considers the amount of debt as of the last day of the year, the value of the asset in question, and emissions estimated internally based on Alior Leasing's portfolio.
- Sovereign Debt: This category includes all government bonds by issuer from different countries. The nominal value of the bonds converted into USD and issuance rates were used for the calculation. GDP data were taken from the World Bank website, while country-specific issuances were taken from the EDGAR database.

All emission values are expressed in tonnes of CO2-equivalent, taking into account all greenhouse gases as defined in the Kyoto Protocol. For the calculation of emissions for exposures denominated in foreign currencies, the average NBP exchange rates as at 31.12.2024 were used.

For the calculation of GHG intensity on the basis of the Alior Bank Group's net income, net income defined as net income from: interest, commissions and dividends (values are consistent with the Alior Bank Group Financial Statement for 2024).

Interest income calculated using the effective interest rate method [PLN K]	6.663.692
Income of a similar nature [PLN K]	570.025
Fee and commission income [PLN K]	1.352.300
Dividend income [PLN K]	322
Total [PLN K]	8.586.339





GHG removals and GHG mitigation projects financed through carbon credits

E1-7

The entity, as a financial services business, does not conduct or plan greenhouse gas removal and storage projects as part of its own operations. It has not participated or is not participating in upstream or downstream projects in its value chain.



Internal carbon pricing

E1-8

As a financial services provider, the entity does not use internal carbon pricing systems.

Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

E1-9

Alior Bank CG uses the option to omit disclosure of this information in accordance with Appendix C of the Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, as the entity is reporting for the first time in accordance with the ESRS requirements.



Social information

Information on Alior Bank Group employees and employees in the value chain includes data on the parent company, Alior Bank S.A. and Alior Leasing Sp. z o.o. and do not include employees of other group companies. This simplification is due to the lack of detailed employment data for the other group companies. The average employment in FTEs in 2024 at Alior Bank and Alior Leasing represents 98% of the value of the average employment in FTEs in 2024 at the entire Alior Bank Group.





OWN WORKFORCE

ESRS S1

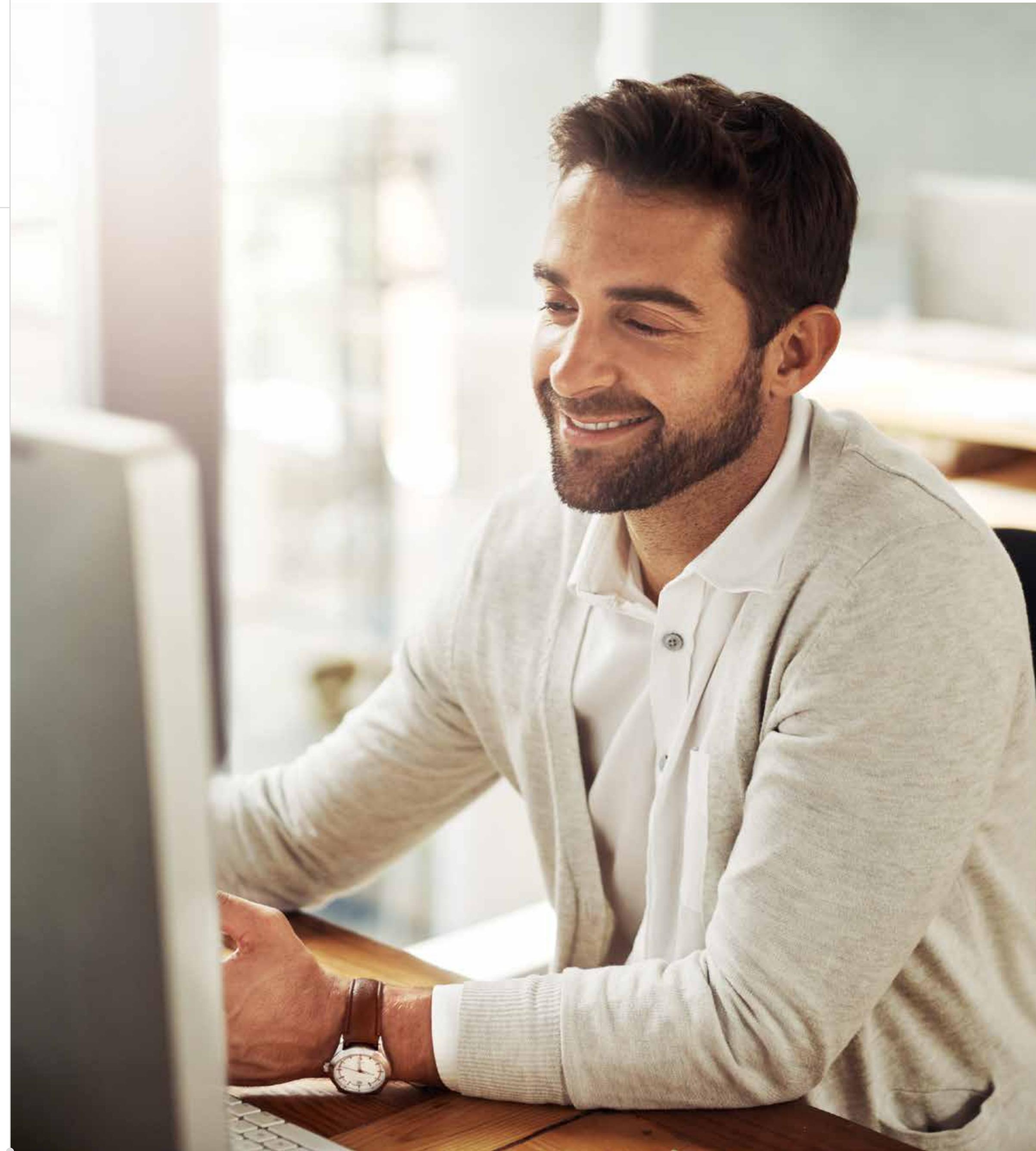
Policies related to own workforce

S1-1

In the Alior Group material impacts, risks and opportunities related to own employees are managed individually by members of the group. At Alior Bank and Alior Leasing, the management boards of each company are responsible for the implementation of relevant policies. The policies are publicly available on the respective entities' websites.

Alior Bank adopted the following policies:

- Human Rights Policy applicable to employees and the Bank's other stakeholders
- Policy for an Unwanted-Behaviour-Free Workplace⁴
- Diversity Policy⁵



Alior Bank recognises respect for human rights and dignity as a fundamental societal value and an essential condition for the company's development. The company is aware of the growing importance of human rights for employees, shareholders, suppliers, clients, and the community. This commitment is reflected in the Human Rights Policy adopted in 2023. This policy stipulates the following:

- Supporting and respecting human rights as recognised by the international community and eliminating any human rights violations by the company
- Respecting freedom of association
- Effectively combating discrimination in employment
- Adopting a preventive approach to environmental issues and promoting an environmentally responsible attitude
- Countering corruption in all its forms, including extortion and bribery
- Utilising and promoting environmentally friendly technologies.

The policy also expresses Alior Bank's categorical opposition to all forms of modern slavery, forced labour, and torture. The parent company strictly complies with regulations on the legal working age, ensuring that child labour is not accepted in any form.

⁴The Diversity Policy and Policy for an Unwanted-Behaviour-Free Workplace apply to all employees bound to the Bank by an employment contract, commission contract, or other similar agreements.

⁵Alior Bank's Diversity Policy is available at: <https://www.aliorbank.pl/dam/jcr:460f2f52-e3ca-43c2-92b2-4fc87960b2d3/polityka-roznorodnosci-alior-bank.pdf>



The policy also expresses Alior Bank’s categorical opposition to all forms of modern slavery, forced labour, and torture. The parent company strictly complies with regulations on the legal working age, ensuring that child labour is not accepted in any form.

The policy aligns with the Minimum Guarantees for Compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights outlined in the eight fundamental conventions specified in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as those set forth in the International Bill of Human Rights and the Ten Principles of the UN Global Compact. The policy is accessible to all employees of the Bank and applies to every individual employed by the organisation. Employees may report any suspected violations of this policy through the channels specified in the Whistleblowing and Whistleblower Protection Policy.

The Diversity Policy at Alior Bank establishes the conditions for strengthening corporate culture values and fostering a work environment where every employee feels respected, valued, and empowered to reach their full potential. The company affirms its commitment to diversity by upholding fundamental human rights and freedoms and preventing discrimination. The organisation ensures equal treatment, fair and equitable remuneration, and safe, ergonomic working conditions for all employees. Additionally, employees have the right to freedom of association, privacy, and freedom of speech and expression.

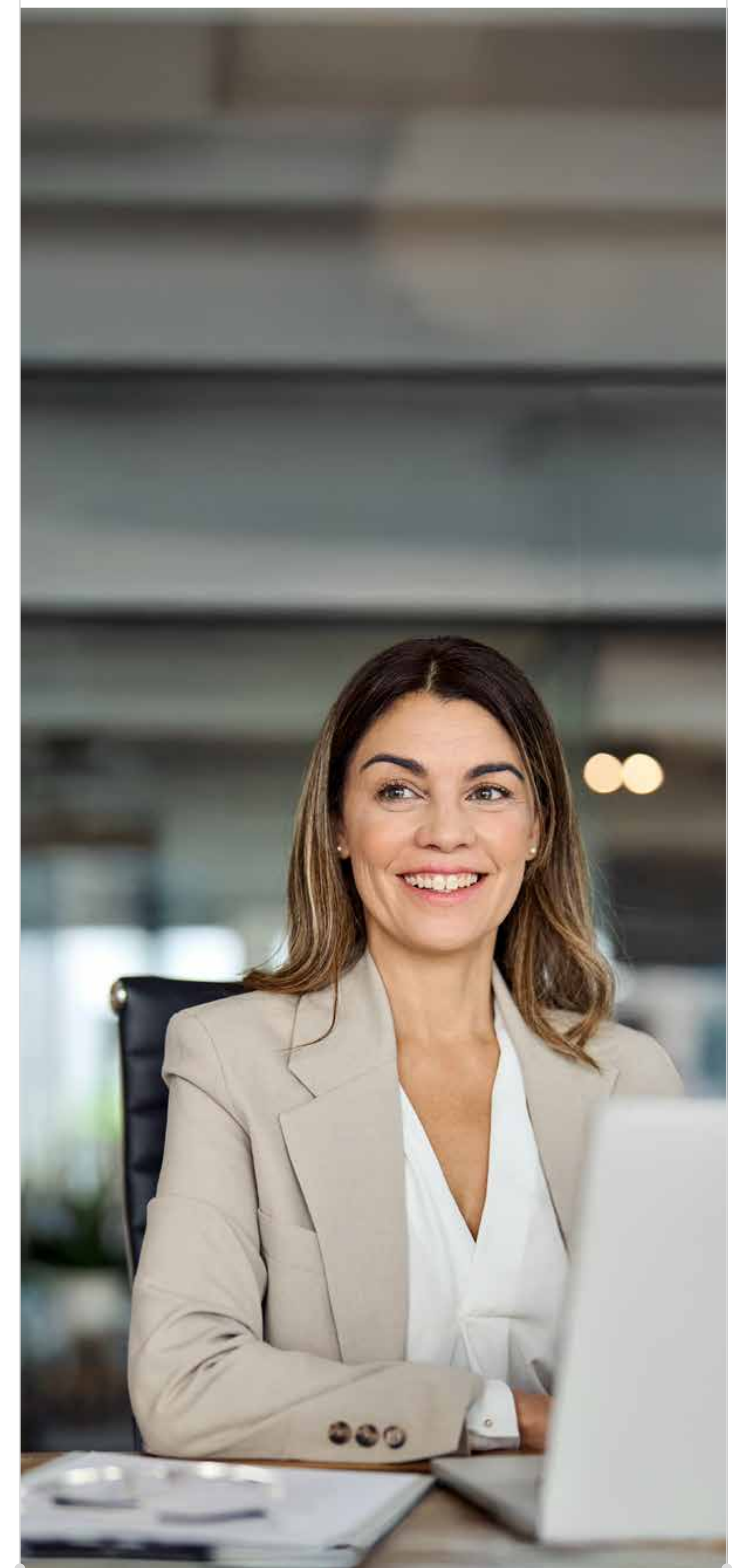
The provisions of the Unwanted-Behaviour-Free Workplace Policy emphasise the company’s commitment to mutual respect in business relations, equal opportunities and its firm opposition to any actions or statements that violate the rights and dignity of others. In line with this policy, bullying, discrimination, harassment, sexual harassment, and any other undesirable behaviour that contravenes the law or principles of social coexistence are deemed unacceptable and will not be tolerated by Alior Bank. Discrimination means unequal treatment of Employees with regard to the establishment and termination of the employment relationship, terms and conditions of employment, promotion and access to training to improve professional qualifications, in particular on the basis of gender, age, disability, race, religion, nationality, political opinion, union membership, ethnic origin, religion, sexual orientation, employment for a definite or indefinite period of time, full-time or part-time employment.

The Policy for an Unwanted-Behaviour-Free Workplace also outlines the preventive measures implemented by Alior Bank. These include providing employees with access to the policy regulations, mandatory e-learning training on undesirable behaviour, and ongoing monitoring of employee relations. Any employee within the organisation can report breaches of the policy, either stating their name or anonymously, to their HR Business Partner, manager, or via a dedicated email. The procedure for conducting investigations is detailed in the Procedures for Reporting Unwanted Behaviour at Alior Bank, as outlined under the Information Related to Corporate Governance section of this statement. The employer (either alone or in consultation with the trade unions), assesses every six months the effectiveness of the measures taken as a result of the Policy for an Unwanted-Behaviour-Free Workplace.

These regulations have been adopted in the company by the Board of Directors and are

available to employees on the company’s intranet. The Human Rights Policy is also published on Alior Bank’s website. Updates to the procedures are communicated to employees through internal information channels.

The Bank guarantees equal treatment for both external and internal candidates, particularly in the establishment of employment relationships. The primary criteria for candidate selection are professional experience and skills. The criteria for selecting individuals for the most important positions at Alior Bank, as well as members of the bodies of the Brokerage Department, are outlined in the Selection and Assessment Policy for Persons Holding Key Functions at Alior Bank and the Suitability Assessment Policy for Members of the Bodies of the Brokerage Department of Alior Bank, respectively. The criteria for assessing the suitability of members of the Management Board and Supervisory Board are specified in the Selection and Suitability Assessment Policy for Members of the Management Board of Alior Bank and the Selection and Suitability Assessment Policy for Members of the Supervisory Board of Alior Bank. The rules regarding members of the Management Board, individuals performing key functions, and members of the bodies of the Brokerage Department are implemented by the Supervisory Board of Alior Bank. The rules concerning the Supervisory Board are implemented by the General Meeting.





96%

percentage of Alior Bank's employees who took part in the 2024 Engagement Survey



64%

engagement index

Alior Bank's ambition is to foster employee engagement, which is understood as a positive attitude of employees toward the organisation and its values. The company strives to build and nurture commitment, which requires a two-way relationship between the employee and the employer. The employer is responsible for creating working conditions that foster such commitment. Efforts in this area are directed at all employees, and a diagnostic tool used to build proper support is, among other things, a periodic engagement survey directed to all or selected units and organisational departments of Alior Bank. Based on the results, the company draws conclusions and makes decisions about necessary actions.

Alior Bank has not implemented a separate policy specifically to prevent workplace accidents.

At Alior Leasing, material risks, impacts, and opportunities related to own employees are addressed, among other areas, in:

- Human Rights Policy that, like at Alior Bank, also applies to the company's other stakeholders
- Alior Leasing's Policy for an Unwanted-Behaviour-Free Workplace
- Code of Ethics
- Diversity Policy

These regulations have been adopted at Alior Leasing by the Management Board and are available to employees on the company's intranet. The Human Rights Policy is also published on Alior Leasing's website. Updates to the procedures are communicated to employees through internal channels.

Alior Leasing's Human Rights Policy⁶ aims to ensure the following for employees:

- open and tolerant working environment
- employer's commitment to the wellbeing of employees, including their psychological, social, and health-related needs
- freedom of association and cooperation with social partners
- equality in employment
- disapproval of forced and child labour
- prevention of discrimination, harassment (mobbing), and other irregularities in the workplace.

The provisions of the Policy align with the human rights standards outlined in the UN International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Economic, Social, and Cultural Rights, and the International Covenant on Civil and Political Rights. The policy also acknowledges the core labour standards set by the International Labour Organization and commits Alior Leasing to adhere to the recommendations on responsible business conduct outlined in the OECD Guidelines for Multinational Enterprises and the Ten Principles of the UN Global Compact.

Employees may report violations of the company's Human Rights Policy in accordance with Alior Leasing's Whistleblowing and Whistleblower Protection Policy and the Policy for an Unwanted-Behaviour-Free Workplace.

The provisions of Alior Leasing's Policy for an Unwanted-Behaviour-Free Workplace, Code of Ethics, and Diversity Policy follow the regulations adopted by its parent company.

⁶ Alior Leasing's Human Rights Policy is available at: https://aliorleasing.pl/wp-content/uploads/2024/06/zal-nr-1-do-UZ.62.2024_-_Polityka-Praw-Czlowieka.pdf



In both the Code of Ethics, the Policy for an Unwanted-Behaviour-Free Workplace, and the Human Rights Policy, Alior Leasing broadly defines discrimination and outlines its prevention. Alior Leasing understands discrimination as unequal treatment of employees in relation to the establishment and termination of the employment relationship, terms and conditions of employment, promotion, and access to training for improving professional qualifications. Discrimination also includes encouraging or directing another person to violate the principle of equal treatment in employment. According to the company's rules, the owner of the regulation is required to review it annually and update it if necessary. These matters are monitored by the Compliance Unit.

Incidents of discrimination, mobbing, or other unwanted behaviour can be reported at Alior Leasing in accordance with the provisions of the Policy for an Unwanted-Behaviour-Free Workplace, as outlined in this statement under the Information Related to Corporate Governance section.

Alior Leasing does not have specific policy commitments regarding the inclusion of individuals from vulnerable groups within own workforce. Employee engagement activities undertaken by Alior Leasing in 2024 include:

- the Give a Gift campaign, in which staff had the opportunity to help fulfil the dreams expressed in letters from seniors who lost their possessions in the 2024 floods
- the Littles' Grand Tour campaign, aimed at raising money for children affected in road accidents
- Two Hours for the Family, a campaign designed to promote family bonding, allowing employees to take an extra two hours off work to spend with their families or loved ones.

The company has not implemented a separate policy specifically to prevent workplace accidents.

Processes for engaging with own workforce and workers' representatives about impacts

S1-2

At the Alior Bank Group, interactions with own workforce are governed by regulations adopted individually by specific member companies.

Alior Bank

Cooperation with Alior Bank's own workforce occurs both directly and indirectly, contributing to the improvement of working conditions and the implementation of various initiatives. Direct cooperation includes annual employee engagement surveys, analysis of onboarding and offboarding interview surveys, and addressing complaints and requests. Indirect cooperation takes place through the bank's active trade union organisations. The bank consults with union representatives on key employee matters in line with the Trade Union Act. In 2024, 18 meetings were held with unions. Additionally, the company has appointed a representative for cooperation with trade unions. In 2024, this role was held by Managing Director of the HR Division.

At Alior Bank S.A., there are no existing agreements that can be interpreted as global framework agreements with employee representatives. The agreements concluded have resolved collective disputes, and their scope addresses employee rights and issues related to remuneration principles, including measures against gender-based pay discrimination.

Alior Bank views the results of the Engagement Survey as a measure of the effectiveness of its collaboration with own workforce.

The agreements reached by Alior Bank through its cooperation with employees include:

- Agreements on base salary raises,
- Agreements regarding the establishment of bonus rules for employees of the Head Office, Audit Department, and Compliance Department,
- Agreements concerning amendments to the Regulations of the Company Social Benefits Fund.

In 2024, Alior Bank has not taken steps to gain insight into the opinions of members of its own workforce who may be particularly vulnerable or marginalised.

Alior Leasing

Alior Leasing has not established any general process for engaging with own workforce.





Processes to remediate negative impacts and channels for own workforce to raise concerns

S1-3

Alior Bank takes preventive measures to avoid material negative impacts on its employees. The company, with particular emphasis on the role of managers and the HR department, supports initiatives aimed at fostering positive working relationships based on legal compliance and the principles of social coexistence. This applies to employer-employee relations as well as interactions between employees and with business partners and clients. The Bank expects all employees to adhere to the principle of mutual respect in their business relationships, meaning their behaviour and statements must not violate the rights or personal dignity of others. Any action or behaviour that constitutes mobbing, discrimination, harassment, sexual harassment, or any other unwanted behaviour violating the law or social coexistence principles is unacceptable and will not be tolerated by Alior Bank. In the event of a negative impact on an employee or staff member, remedial measures are recommended within the framework of the Procedure for dealing with complaints of undesirable behaviour, described in the chapter Information related to corporate governance, and the timely implementation of these recommendations is verified through email communication to the units responsible for their implementation.

Within the Alior Bank Group, channels for employees to raise concerns or issues, and the methods for addressing them, have been established for individual companies separately. At the parent company, Alior Bank, these are outlined in the Whistleblowing and Whistleblower Protection Policy and the Policy for an Unwanted-Behaviour-Free Workplace. At Alior Leasing, this is governed by the Alior Leasing Whistleblowing and Whistleblower Protection Policy. More information on the policies implemented in the companies is provided in the Information Related to Corporate Governance section of this statement. This section also includes details on the whistleblower protection policies in place across individual Group companies.

The Alior Bank Group does not have specific procedures to assess employees' awareness of reporting channels. However, employees are informed about their operation during mandatory training sessions, and their knowledge is updated annually. Additionally, all new hires are required to complete whistleblowing training.





Taking action on material impacts on own workforce, adopting approaches to managing material risks and pursuing material opportunities related to own workforce, and the effectiveness of these actions

S1-4

Alior Bank addresses the material negative impact identified during the double materiality assessment regarding the lack of female representation in the senior management. In 2024, Alior Bank became a signatory to the Diversity Charter, committing to prohibit discrimination in the workplace and promote diversity. The Charter also reflects the company's commitment to involving all employees, as well as business and social partners, in these efforts. Following the adoption of the Charter, Alior Bank updated its Diversity Policy, which includes recruitment standards aligned with the EU Directive on equal treatment in employment, diversity in development, interests, and communication, as well as equality in pay and benefits. The policy also outlines the channels through which employees can report any violations (non-compliance with the provisions of the Policy or suspected non-compliance). Alior Bank joined the Diversity and Inclusion Committee of the Polish Bank Association in January 2025. In 2024, Alior Bank did not use leverage in its business relationships to address material adverse impacts on employees.

In accordance with the company's policies for selecting and assessing the suitability of Management Board and Supervisory Board members, the company strives to ensure diversity on both boards, including in terms of gender. The Appointments and Remuneration Committee of the Supervisory Board ensures that both genders are considered in the selection process, with a minimum gender minority of 30%.

At the Group's parent company, measures to create a positive impact on employees are developed based on regular engagement surveys. This enables the identification and addressing of their needs and areas for improvement. Alior Bank also periodically evaluates the effectiveness of its actions through satisfaction surveys conducted after development activities and organised events.

The company identifies the necessary and appropriate actions in response to the impact on its employees and tracks and evaluates their effectiveness through periodic Engagement Surveys.

At Alior Leasing, plans, actions, and resources to manage material impacts, risks, and opportunities related to own employees are identified and implemented by the Health and Safety, Internal Audit, Compliance, and HR units. In 2024, the company did not implement actions related to identified material adverse impacts on own workforce. To ensure a positive material impact, the company conducted regular health and safety training, operational risk training, and educational activities related to AML. The effectiveness of these initiatives is tracked and evaluated through knowledge tests conducted after training sessions. The company does not have a formal process in place for identifying activities related to actual or potential negative impacts on employees.

The Alior Bank Group has not identified any material opportunities related to own workforce, nor has it identified any negative impact on employees resulting from its transition to a greener, climate-neutral economy.

The Alior Bank Group has no information to report on planned or ongoing measures to mitigate material risks arising from its influence and dependence on own employees, nor on how their effectiveness is monitored. The Group also does not have data on the resources allocated to managing its impact on employees.

In 2024, Alior Leasing did not implement additional measures specifically aimed at ensuring a positive impact on its employees.





Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S1-5

The Alior Bank Group has not set targets for managing material employee-related impacts, risks, and opportunities. The double materiality assessment process concluded in December 2024, and the Group did not establish performance-related targets during the reporting period.

Characteristics of the undertaking's employees

S1-6

Characteristics of Alior Bank Capital Group employees include consolidated data for the companies: Alior Bank S.A., Alior Leasing Sp. z o.o., Alior TFI SA, Alior Services sp. z o.o. Other companies of the Alior Bank Capital Group do not have a significant impact on the presented data.

Number of employees by gender

Gender	Alior Bank S.A.	Alior Bank Group
Men	2,475	2,661
Women	4,164	4,415
Others	0	0
Undisclosed	0	0
Total employees	6,639	7,076



⁷ Liczba osób zatrudnionych na 31.12.2024 roku. W liczbie pracowników nie uwzględniono pracowników na etatach mniejszych niż 0,4 pełnego wymiaru czasu pracy ani pracowników zatrudnianych na podstawie umów-zleceń.



Employees by contract type and gender

	Women	Men	Others	Undisclosed	Total
Alior Bank S.A.					
Employees (total number)	4,164	2,475	0	0	6,639
Indefinite-term employees (total number)	3,525	2,076	0	0	5,601
Fixed-term employees (total number)	639	399	0	0	1,038
Employees with no guaranteed hours (total number)	0	0	0	0	0
Full-time employees (total number)	4,054	2,455	0	0	6,509
Part-time employees (total number)	110	20	0	0	130
Alior Bank Group					
Employees (total number)	4,416	2,664	0	0	7,080
Indefinite-term employees (total number)	3,748	2,234	0	0	5,982
Fixed-term employees (total number)	667	427	0	0	1,094
Employees with no guaranteed hours (total number)	0	0	0	0	0
Full-time employees (total number)	4,296	2,636	0	0	6,932
Part-time employees (total number)	119	25	0	0	144

Number of employees who left the organisation during the reporting period and employee turnover rate

	2024
Alior Bank S.A.	
Number of employees who left the organisation during the reporting period	1,017
2024 turnover rate	15.5%
Alior Bank Group	
Number of employees who left the organisation during the reporting period	1,181
2024 turnover rate	15.65%



Characteristics of non-employees in the undertaking's own workforce

S1-7

In 2024, the Alior Bank Group had no data to report on the aggregate characteristics of individuals who are not employees but qualify as own workforce. The largest number of people belonging to this category are employed in Alior Bank's IT Division, through external companies under employee leasing. In December 2024, Alior Bank had agreements with 11 such intermediaries and used the services of 97 specialists under the employee leasing formula.

Diversity metrics

S1-9

At Alior Bank, "senior management" for the purposes of this statement refers to employees leading the Bank's Head Office units and organisational units, up to two reporting levels below a member of the Bank's Management Board. Alior Leasing has adopted the same definition, considering employees up to two reporting levels below a Management Board member as senior management.

Gender diversity in the senior management

	2024			
	Women	Men	Others	Undisclosed
Alior Bank S.A.				
Number of senior management members	32	59	0	0
Proportion of genders in senior management (%)	35.16%	6.84%	0.00%	0.00%
Alior Bank Group				
Number of senior management members	44	84	0	0
Proportion of genders in senior management (%)	34.38%	65.63%	0.00%	0.00%

Age structure of the workforce of Alior Bank and AliorBank Group

Total number of employees, including:	2024	
	Number	%
Alior Bank S.A.		
Age group: under 30	1,102	16.6
Age group: 30-50	4,843	72.9
Age group: over 50	694	10.5
Alior Bank Group		
Age group: under 30	1,154	16.31
Age group: 30-50	5,170	73.06
Age group: over 50	752	10.63





Adequate wages

S1-10

In 2024, the Alior Bank Group did not pay any employees below the legal minimum wage threshold. At the Group's parent company, the minimum wage, excluding bonuses and employee benefits, was PLN 700 higher than the legal minimum and amounted to PLN 5,000 gross⁸.

100%

Employees who receive fair pay

0%

Percentage of employees who receive remuneration below the adequate pay

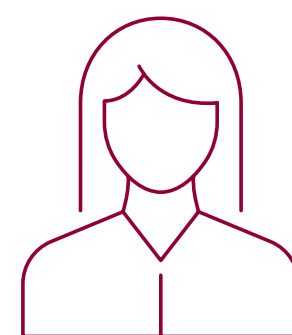
Training and skills development metrics

S1-13

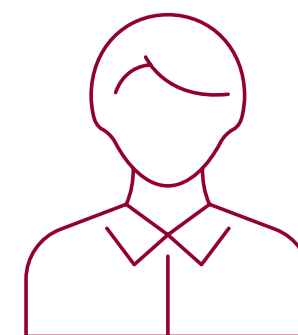
Percentage of employees who took part in regular performance reviews and career development programmes

	Number of employees	Number of performance review and career development programme participants	Percentage
Alior Bank S.A.			
Women	4,164	3,779	90.75%
Men	2,475	2,442	98.67%
Total	6,639	6,221	93.70%
Alior Bank Group			
Women	4,415	4,029	91.26%
Men	2,661	2,627	98.72%
Total	7,076	6,656	94.06%

Average number of training hours by gender

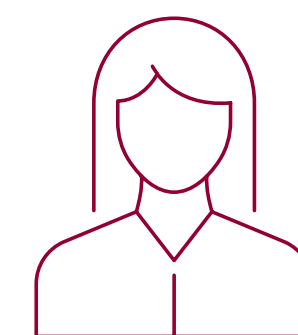


Women
32,5h

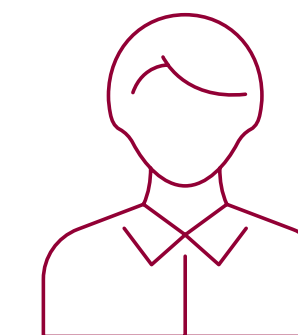


Men
32h

Alior Bank



Women
31,10h



Men
30,64h

Alior Bank Group

Średnia liczba godzin szkoleniowych na osobę

32h

Alior Bank

30,63h

Grupa Alior Bank

⁸Since September 2024



Health and safety metrics

S1-14

The Alior Bank Group has not implemented a unified Health and Safety Management System covering employees across all companies within the Group. Instead, this matter is regulated at the individual company level.

At Alior Bank, the management of occupational health and safety is based on the provisions of the Labour Code and secondary legislation concerning working conditions. In 2024, there were no fatal accidents or cases of occupational diseases at the bank. However, 9 occupational accidents were recorded, resulting in 79 days of employee absenteeism.

Alior Leasing has not implemented an OSH management system, however, all employees are covered by the Management Board's resolution approving an OSH policy.

In 2024, Alior Leasing:

- had no fatalities due to work-related injuries or illnesses
- had no fatalities as a result of work-related injuries or ill-health among other workers on the premises
- recorded two work-related accidents involving its own employees
- had no cases of work-related ill-health among workers
- recorded 8 days of absence due to work-related injuries
- had no cases of work-related ill-health among former employees.

The accident rate at Alior Leasing in 2024 was 0.4%.

In total, there were 11 work-related accidents among Alior Bank Group's own employees. In both group companies, there were no fatalities as a result of work-related injuries and ill-health of other employees working on the premises.

Work-life balance metrics

S1-15

All employees of the Alior Bank Group are entitled to family leave, which includes maternity, paternity, and parental leave.

Percentage of entitled employees who have used family leave

Alior Bank S.A.	
Total	10.94
Women	12.99
Men	7.47
Alior Bank Group	
Total	10.77
Women	12.81
Men	7.37





Remuneration metrics (pay gap and total remuneration)

S1-16

Starting with the 2023 reporting, the Bank calculates the pay gap in accordance with the methodology for calculating the indicators in Part 6 of the Guideline of 30 June 2022 on benchmarking of remuneration practices, the gender pay gap and approved higher ratios of variable to fixed components of remuneration under Directive 2013/36/EU (EBA/GL/2022/06). According to the current guidelines, the gender pay gap is calculated among all employees including the Executive Board, based on total remuneration.

For the analysis of the data, exclusions have been applied in accordance with EBA/GL/2022/06 Part 6, point 51 and, for consistency of analysis, acting in accordance with the best effort principle, employees in positions of less than 0.4 full-time equivalents have been excluded.

Below we present data for the wage gap for the Bank and on a consolidated basis for the Alior Bank Group calculated on the basis of average salaries.



Remuneration metrics (pay gap and total remuneration) SI-16

	2023 (after the variable remuneration update for 2023 in June 2024)	2024 (as at as of December 2024)
Unadjusted gap Alior Bank Group *	N/A	25.74%
Unadjusted gap Alior Bank S.A.	28.45%	25.74%**

* The consolidated ratio for the Alior Bank Group was calculated by applying the employee-weighted average for the companies: Alior Bank and Alior Leasing.

** The pay gap calculation will be updated in June 2025 to include all paid variable remuneration components earned and payable for 2024, which have not yet been awarded as at the date of the report. Updated pay gap data including variable components in terms of the EBA/GL/2022/06 methodology will be provided by the Bank to the NBP in accordance with the set reporting deadlines.

In 2024, the unadjusted wage gap between women and men was 25.74%. The reported ratio is lower by approximately 5 p.p. than the ratio calculated for the CSO section - Financial and Insurance Activity (Alior Bank S.A.'s own calculations according to CSO data: remuneration measures by PKD section and gender in July 2024, on the basis of average salaries).

In addition, at the Bank we monitor the weighted pay gap, which compares salaries in homogeneous groups, comparing the amount of remuneration for work of the same or similar value (calculation on the basis of basic salary taking into account grade levels and job families). The pay gap at Alior Bank, expressed as a weighted average of women's base salaries to men's base salaries, was 1.9% in December 2024.

Pay Ratio - ratio of annual total remuneration

2024	Alior Bank Group *	Alior Bank S.A.
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Ratio of annual total remuneration for the top earner in the organisation to the median annual total remuneration for all employees (excluding the top earner)

* The consolidated ratio for Alior Bank Group was calculated by applying the employee-weighted average for the companies: Alior Bank and Alior Leasing.

Due to changes in the Bank's Management Board in 2024, the highest total remuneration in the organisation was calculated by compiling the remuneration amounts of the highest paid position in a given month of the year, even if other people worked in this position in particular months.



WORKERS IN THE VALUE CHAIN

ESRS S2

Policies related to value chain workers

S2-1

In the Alior Bank Group, policies related to individuals working within the value chain, i.e. employees and female employees of partner offices, are adopted at the company level for each entity within the organisation.

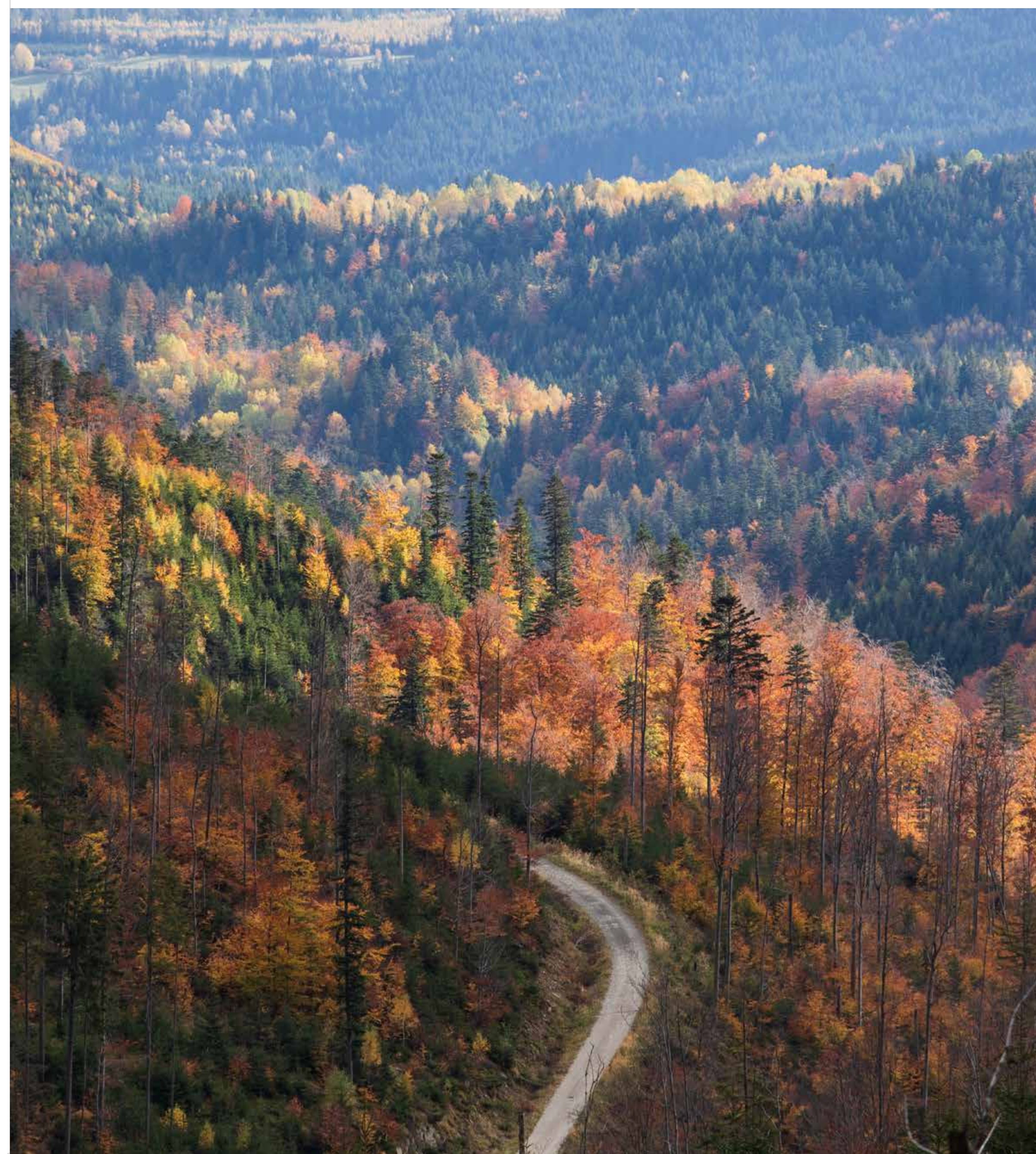
Alior Bank

At Alior Bank, the principles for managing the material impact related to workers in the value chain are not addressed in the company's existing policies. In 2024, the bank's partner facilities did not have access to the IT banking network for e-learning. However, Alior Bank has begun analysing the technical feasibility of providing access, with plans to complete the work in the first half of 2025.

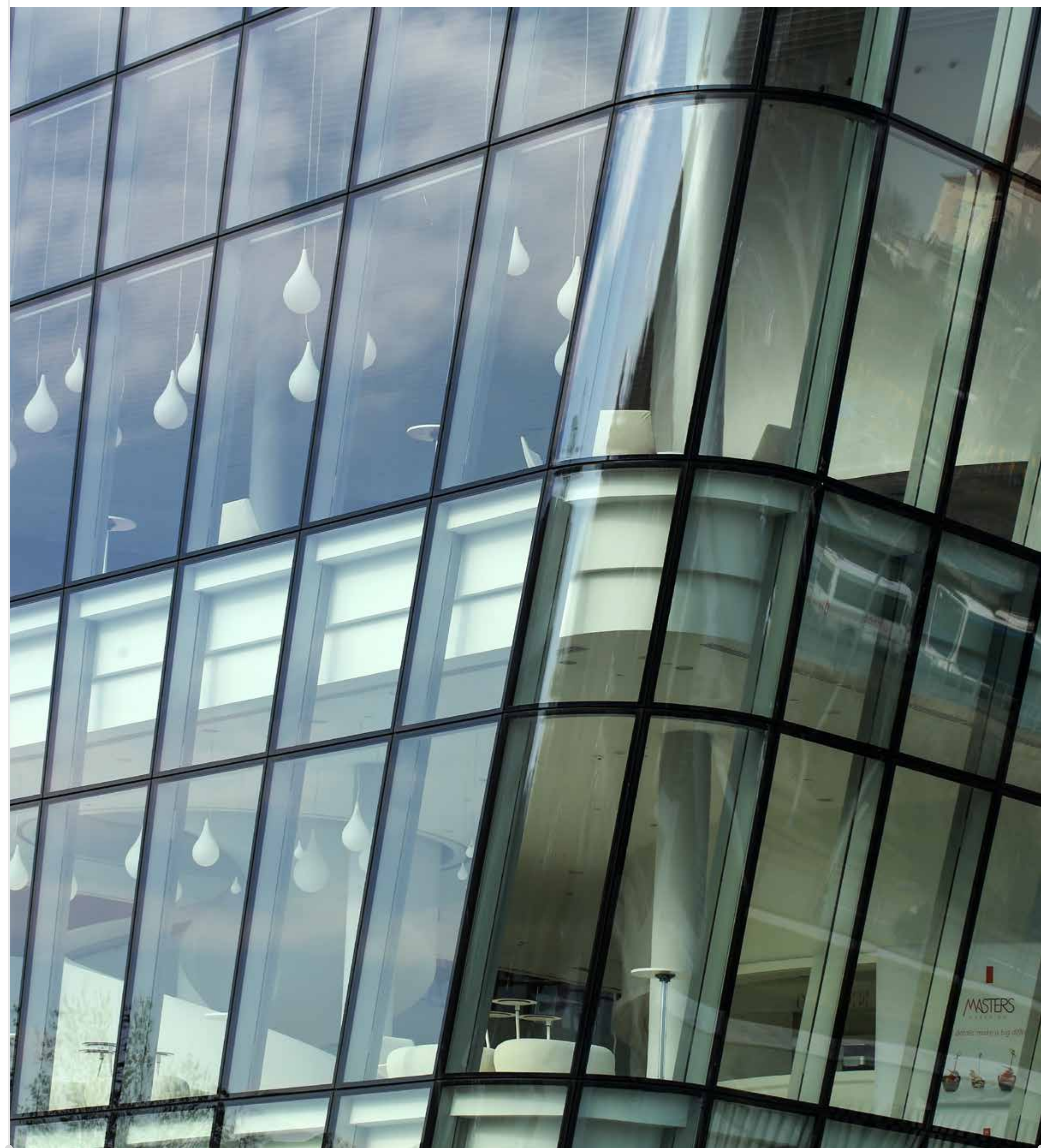
Alior Bank's human rights obligations concerning workers in the value chain are outlined in the company's Supplier Code of Ethics, adopted by the Alior Bank Management Board. The company requires suppliers to:

- provide their employees with pay and benefits that meet or exceed applicable legal provisions and ensure these are settled on time and regularly,
- guarantee other employee benefits, such as days off and holidays,
- not benefit in any way from slavery, forced labour, human trafficking, or child labour,
- uphold the right of workers to freely associate, in accordance with or exceeding legal requirements,
- provide a workplace that is free from discrimination and harassment, respecting rules where abuse is unacceptable, particularly regarding age, disability, social or ethnic origin, gender, gender identity, nationality, race, sexual orientation, marital status, political opinion, religion, trade union membership, and family status,
- Guarantee appropriate working conditions, including a hygienic, safe, and hazard-free environment, and have plans in place to ensure the safety of workers.

Alior Bank also expects its suppliers to implement mechanisms that raise awareness among their employees about the human rights outlined in the Supplier Code of Ethics. Additionally, the company encourage suppliers to promote diversity, inclusion, and integration within both the workplace and the supply chain.



⁹ Alior Bank's Supplier Code of Ethics: <https://www.aliorbank.pl/dam/jcr:684db6f4-da46-4c6e-8bca-5f22022d2afc/kodeks-etyki-dostawcow-alior-bank.pdf>



Alior Bank's Supplier Code of Ethics reserves the right to audit or inspect suppliers to ensure compliance with the Code. This issue is addressed in the majority of contracts concluded, although in exceptional cases contracts are signed to the exclusion of the right of inspection. Within the scope of applicable legislation, the supplier is obligated to provide necessary information and documents confirming compliance with the human rights outlined in the Code. The Company also allows workers in the value chain to report violations of the Code by sending information to the dedicated email address: naruszenia@alior.pl.

The human rights-related document applicable to Alior Bank is also the Alior Bank Human Rights Policy, as described in this statement in section S1 - Own workforce. Its provisions apply both to the company's own workforce and to other stakeholders, particularly employees of partner facilities. Any violations resulting from suspected non-compliance with the provisions of the Human Rights Policy can be reported by employees of these outlets in accordance with the Whistleblowing and Whistleblower Protection Policy.

The Alior Bank Supplier Code of Ethics and Human Rights Policy align with key international standards, including the OECD Guidelines for Multinational Enterprises, the human rights standards defined in the Universal Declaration of Human Rights which consists of the Universal Declaration of Human Rights and the two covenants implementing it, as well as the ILO Declaration on Fundamental Principles and Rights at work and the fundamental conventions that form its basis. In 2024, the company did not record any instances of non-compliance with these regulations with respects to workers in the value chain.

Alior Bank has not adopted any regulations regarding a general approach to the engagement of workers in the value chain.

Alior Leasing

At Alior Leasing, the principles for managing the material impact related to workers in the value chain have not been formalised. However, in 2024, the company took steps to establish and monitor access to training for workers in the value chain.

Alior Leasing's obligations regarding human rights for workers in the value chain are outlined in the Business Ethics - Supplier's Statement document, which is published on the company's website. The company considers the submission of any offer as acceptance of its terms. Regarding human rights for workers in the value chain, the Business Ethics rules are aligned with the company's Human Rights Policy. Alior Leasing expects its suppliers to:

- refrain from employing minors,
- ensure no discrimination against employees on any grounds, particularly based on gender, age, race, disability, nationality, ethnic origin, sexual orientation, political views, trade union membership, or religion,
- comply with legal requirements regarding minimum wages and working hours,
- provide employees with safe and hygienic working conditions.

The text of the Business Ethics - Supplier's Statement document has been approved by the Management Board of Alior Leasing, and it does not refer to any international standards. The company has no additional Supplier Policy.

Requirements for business partners, identical to those outlined in the Business Ethics - Supplier's Statement document, are also included in Alior Leasing's Human Rights Policy. This policy aligns with key international standards, including the OECD Guidelines for Multinational Enterprises, the human rights standards defined in the



Universal Declaration of Human Rights, and the core labour principles established by the International Labour Organization. The company also provides workers in the value chain with a mechanism to report suspected violations of the Human Rights Policy, in accordance with the Whistleblowing and Whistleblower Protection Policy and the Policy for Unwanted-Behaviour-Free Workplace.

Alior Leasing has not adopted any regulations regarding a general approach to the engagement of workers in the value chain.

Processes for engaging with value chain workers about impacts

S2-2

Within the Alior Bank Group, the processes for engaging with workers in the value chain about impacts are established for each company individually. The policies of parent companies are cascaded down to subsidiary companies.

Alior Bank

At Alior Bank, the departments responsible for ensuring cooperation with value chain workers include the External Network Department and the HR Division, supported by other organisational units at the company's head office.

The parent company of the Group ensures that agents and their employees receive onboarding training through signed agency agreements. This training covers banking products, legal regulations, security principles, and regulatory guidelines necessary for agency operations. Additionally, the company provides development training for them. Every three months, partner facilities undergo inspections and employee knowledge assessments. If the results are unsatisfactory or serious irregularities are detected, this may result in the employee being blocked from working at the facility.

Alior Bank uses post-training surveys to assess participant satisfaction with training sessions

at partner facilities. The survey results are analysed, and if areas requiring improvement are identified, the company develops appropriate actions. The company does not take separate measures to gain insight into the perspectives of value chain workers who are particularly vulnerable to impacts or marginalised.

Alior Bank is not a party to global framework agreements or other contracts with global trade unions regarding the respect for human rights of workers in the value chain. The company also does not have regulations in place for considering the opinions of value chain workers when making decisions about their working conditions.

Alior Leasing

In 2024, Alior Leasing had no processes in place for engaging value chain workers, and the company has no plans to develop or implement such processes.

Processes to remediate negative impacts and channels for value chain workers to raise concerns

S2-3

The double materiality assessment identified one potential negative impact related to workers in the value chain: the possibility of violations by employees of partner facilities and intermediaries due to a lack of training on the Whistleblowing and Whistleblower Protection Policy and the Code of Ethics. In 2024, Alior Bank began offering training on this subject to employees at partner facilities.

The companies within the Alior Bank Group provides value chain workers with channels through which they can directly report their concerns or needs to the company. These channels are described in the Whistleblowing and Whistleblower Protection Policies, which are implemented in Alior Bank and Alior Leasing. The regulations specify that any person providing work under the supervision and direction of a contractor, subcontractor, or supplier has the right to report information via a dedicated phone number ensuring anonymity, in writing to a dedicated email address, by traditional mail, or orally to designated employees, President of the Management Board or the Supervisory Board. Under the procedures implemented in the company, whistleblowers are protected from retaliatory actions.



Investigations conducted in accordance with the procedures outlined in the Policy are subject to confidentiality requirements regarding all information determined both during and after the investigation. The procedure is described in detail in the chapter Business conduct - ESRS G1. In the event of a negative impact on an employee or employee in the value chain, remedial measures are recommended within the framework of the Procedure for dealing with complaints about the occurrence of undesirable behaviour, as described in the chapter Information related to corporate governance, and the timely implementation of these recommendations is verified through email communication to the units responsible for their implementation.

The Policy is accessible to all workers in the value chain, including on the websites of Alior Bank and Alior Leasing. The companies have not implemented regulations to assess the extent to which value chain workers are aware of and trust the processes that allow them to report their concerns or needs and receive responses.

Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action

S2-4

Actions related to impacts on value chain workers are taken individually by each company within the Alior Bank Group. The Group has not identified any material risks or opportunities resulting from the impact or dependence on value chain workers.

Alior Bank

In 2024, the actions of Alior Bank that involved potential negative impact on workers in the value chain concerned the way training on ethics and reporting channels was provided to employees at partner facilities. The scope of training on security and data protection is the same as the training provided to the company's employees. These trainings are conducted at all partner facilities. Alior Bank evaluates the effectiveness of these actions through monitoring of the partner facilities carried out by their supervisors – Sales Directors. Additionally, facilities may be subject to inspections by the Structured Credit Department and the Security Division.

The company does not have data to determine the resources allocated in 2024 to manage material impacts on value chain workers.

A potentially negative impact on workers in the value chain was identified during the double materiality assessment completed in December 2024. Alior Bank plans to review the results of the analysis in 2025 and determine whether, and if so to what extent, the company will take additional actions in response to the identified impact. At the same time, Alior Bank provides its employees with comprehensive ethics training and does not identify any situations in which its own practices would cause or contribute to a material negative impact on employees of partner facilities.

In 2024, Alior Bank also implemented actions aimed at exerting a positive impact on workers in the value chain, including competitions and special initiatives.

In 2024, Alior Bank did not record any incidents related to human rights concerning workers in the value chain.

Alior Leasing

In 2024, Alior Leasing did not take any actions related to negative impacts on workers in the value chain due to the absence of partner facilities.



Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S2-5

The Alior Bank Group has not set measurable goals related to managing the material impact on value chain workers identified in December 2024: the lack of initial and refresher training on the Whistleblowing and Whistleblower Protection Policy and the Code of Ethics. The bank is working on implementing training in this area for employees at partner facilities and intermediaries.





CONSUMERS AND END-USERS

ESRS S4

Policies related to consumers and end-users

S4-1

The companies within the Alior Bank Group have not yet adopted consistent policies for the monitoring and management of material impacts, risks and opportunities related to consumers and end-users.

Alior Bank

The double materiality assessment, completed within the Alior Bank Group in December 2024, revealed these impacts, risks, and opportunities. During the reporting period, the parent company did not begin updating or developing regulations to directly address its results. However, the policies in force within the Group in 2024 covered some of the identified impacts, risks, and opportunities. Areas not covered by these regulations will be analysed in the near future to determine whether additional regulations are needed.

Impact

Impact on access to information through the development and implementation of a Disclosure Policy governing communication with clients, capital market participants, and the media.

The Bank positively contributes to the protection of clients' rights through a Client Ombudsman, who independently evaluates the Bank's actions and verifies compliance, fostering trust and transparency in client relationships.

Impact on greater social inclusion in financial services by offering free bank accounts, microloans, and microfinance solutions accessible to all, including low-income individuals and young people.

Impact on responsible marketing practices by developing and implementing Anti-Unfair Sales Policy to prevent misselling practices.

Impact on clients' financial security through effective complaint handling procedures

Digital exclusion of clients from financial services due to excessive automation of the customer service process and the use of AI

Rules and regulations

The Alior Bank Disclosure Policy¹⁰ defines the rules for secure and consumer-friendly communication and specifies the deadlines and methods of communication.

The appointment and role of a Client Ombudsman, who operates independently from other customer service functions within the Bank. This enables assessment of any irregularities in Alior Bank's operations, reported by clients.

No policy

The Anti-Unfair Sales Policy and Responsible Marketing Practices¹¹ prevent misselling. Alior Bank has established rules for the proper development and distribution of its products. Certain products may only be distributed through authorised channels and by employees with the necessary expertise.

The establishment of procedures for filing complaints and ensuring their investigation and resolution in accordance with the law and internal regulations.

Alior Bank SA Disclosure Policy governing communication with clients, capital market participants, and the media



¹⁰ Alior Bank Disclosure Policy is available at: https://www.aliorbank.pl/dam/jcr:9a2e129c-0c6e-4d20-ad42-28f6885adcf7/Polityka_informacyjna_Alior_Bank_SA_w_zakresie_komunikacji_z_klientami_uczestnikami_rynku_kapitalowego_i_mediami.pdf

¹¹ Responsible Marketing Practices are available at <https://www.aliorbank.pl/dam/jcr:88d545df-dbed-46d9-9a54-d76c85cd8775/zasady-odpowiedzialnego-marketingu.pdf>



Risk

Overview

Risks related to increased consumer protection in the future in terms of access to information, including in relation to the construction of contractual clauses (such as free credit sanctions, mortgage contracts indexed to foreign currencies)

Lawsuits concerning the reimbursement of credit costs due to defects in a consumer credit agreement. The primary cause of dispute identified by the plaintiffs concerns the provisions of the loan agreements concerning the Bank's use of conversion rates, leading to claims for the partial or total invalidity of the loan agreements. Information on this risk is provided in the Consolidated Financial Statement of Alior Bank Group for the year ended on 31 December 2024 (note no. 40).

The risk of increased consumer protection in the future in terms of responsible marketing practices, such as the way in which investment fund participation certificates are distributed.

The court is adjudicating on the Bank's liability for damage caused by its failure to properly fulfil its disclosure obligations to clients and its improper execution of agreements for accepting and transmitting orders to purchase or sell investment certificates of the funds. More information on this risk is provided in the Consolidated Financial Statement of Alior Bank Group for the year ended on 31 December 2024 (note no. 40).

Additionally, Alior Bank is a member of the Polish Bank Association (ZBP) and follows the Guidelines of the Good Banking Practice developed by ZBP.



At Alior Bank, respect for the human rights of consumers is upheld through the Human Rights Policy and the Bank's commitment to adhere to the Universal Declaration of Human Rights adopted by the United Nations. The Bank recognises recommendations for responsible business conduct included in the OECD Guidelines for Multinational Enterprises, and the Ten Principles of the UN Global Compact. Alior Bank is guided by the principle of reliability and honesty in the services it provides to its customers. It complies with Polish banking law protecting the interests of its customers through internal regulations adopted and implemented for use. Alior Bank's customers are guaranteed, among other things: access to complete and clear information at every stage of concluding an agreement; the right to withdraw from an agreement; and the right to access and protect their personal data. The Human Rights Policy adopted by the company designates Alior Bank's Compliance Unit as the entity responsible for receiving reports of potential violations. In 2024, Alior Bank did not register any violations of these standards with respect to consumers and end-users.

The relationship with consumers is governed primarily by Alior Bank's Disclosure Policy. According to this Policy, the Bank aims to present information about its products and services in an approachable, effective, and convenient manner, while considering the impact of communication on reputation risk. In this Policy the Bank commits to responding to enquiries, client complaints, and appeals to the Client Ombudsman in a fair and objective manner, upholding the highest ethical standards in communication, and respecting clients' privacy. Additionally, the Bank promises thorough analysis of clients' comments, applications, and complaints, and to implement solutions aimed at continuously improving quality.

Alior Leasing

Alior Leasing's services are not aimed at individual clients; the company serves exclusively corporate clients.



Processes for engaging with consumers and end-users about impacts

S4-2

Within the Alior Bank Group, the process for engaging with individual clients about impacts is established for each company separately.

Alior Bank

At Alior Bank, the relationship with clients is not formalised by any internal regulations. In 2024, client engagement was shaped by the decisions of individual business units. Alior Bank has no plans to adopt regulations in this regard. The consumer engagement area is overseen by Director of the Marketing and Client Relationships Department, Managing Director of the Operations and Settlements Division, and Department Directors.

The perspectives of consumers and end-users of the Group's parent company are identified through a Net Promoter Score (NPS) survey. The survey allows the company to assess client loyalty in long-term and short-term perspectives, identify the company's strengths and weaknesses, and respond to identified client needs. It is primarily conducted by telephone across a selected group of clients and includes:

- relationship analysis that focuses on clients' overall perception of the brand,
- transaction analysis that focuses on individual transactions.

In addition to the NPS survey, Alior Bank conducts focus group interviews, client satisfaction surveys, and dedicated client surveys. Moreover, the company regularly conducts interviews with its partners directly involved in the sales process and client interactions.

Client responses help the company understand the key factors affecting client satisfaction and provide appropriate recommendations for process improvements and client segmentation. [S4-2_03] The preparation of qualitative and quantitative research, along with result analysis, is handled by the product owners, business process owners, and the UX Design Team, particularly the UX and Product Research Team. The results are taken into consideration at the stage of:

- definition of new functionalities of the systems,
- implementation of new business ideas as part of idea validation (quantitative research), or client needs analysis (in-depth interviews),
- verification of project's alignment with clients' expectations and its usability (usability testing before and after the implementation of a service / interface).



Feedback from Alior Bank’s clients is not considered when setting goals for individual units, defining key performance indicators, or shaping the company’s strategic vision.

Clients can contact Alior Bank using the following communication channels:

- bank outlets and branches,
- helpline,
- electronic banking,
- email,
- contact form on Alior Bank’s website,
- e-Doręczenia platform,
- traditional post.

Every piece of information provided to Alior Bank is considered by the company to be an essential part of the client relationship. The Bank addresses each report individually, ensuring high communication standards and using plain language. Client reports on the accessibility of digital services are forwarded to the relevant unit responsible for accessibility, which then engages in further dialogue with clients on the matter.

In 2024, Alior Bank implemented special measures to gain insight into the perspectives of clients who may be at a higher risk of being impacted or marginalised. The company conducted a series of studies on children aged 7 to 13 and seniors over 80. The studies on children aged 7 to 13 involved in-depth interviews and usability testing. A parent was present throughout the whole meeting. The studies were conducted remotely and in person. Every session required parent’s written consent for the child’s participation in the study.



In 2025, the Bank plans to conduct research and consultations involving disabled individuals, people diagnosed with dementia, and legally incapacitated individuals. These plans are linked to the enactment of the Polish Accessibility Act.

Additionally, in 2024, Alior Bank launched a series of training sessions on the accessibility of products and services, delivered by a specialised third-party firm. The sessions are aimed at designers, researchers, analysts, product owners, and production teams involved in developing the Alior Mobile and Currency Exchange apps. In 2024, Alior Bank introduced the role of Digital Accessibility Manager. The role of Digital Accessibility Manager is to advocate for individuals with special needs, including those with disabilities, and to promote inclusive design. This includes ensuring that various Alior Bank units consider the perspectives of individuals with special needs when developing products and services.

The company does not have a formal procedure for assessing the effectiveness of consumer and end-user engagement. In certain cases client loyalty and satisfaction are evaluated on the basis of NPS surveys and, for the mobile app, user reviews posted on app platforms.

Alior Leasing

Alior Leasing’s services are not aimed at individual clients; the company serves exclusively corporate clients.



Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

S4-3

The processes for remediating negative impacts and channels for consumers and end-users to raise concerns are established individually for each company within the Alior Bank Group.

Alior Bank

Alior Bank's clients can file complaints concerning products and services in the following ways:

- by visiting any bank branch and raising concerns orally or in writing,
- by calling the helpline,
- through the electronic banking system,
- by traditional post,
- electronically at the address for electronic service.

In addition to the dedicated complaint channels, Alior Bank also offers clients the option to contact the Bank via email and a contact form on the website. Clients are informed about these contact options on the website, in product terms and conditions, and through written correspondence. As a rule, the reports received by Alior Bank pertain to identified clients. If the Bank receives an anonymous report, each report is handled individually, depending on whether Alior Bank's procedures allow for a response.

The total number of complaints in 2024 was 63,741, which were reported by 50,346 customers. This means that 1.1% of all the bank's customers made a complaint in the last year. In recent years, the bank has seen a consistent downward trend in the number of complaints. Over the last five

years, their number has decreased by 25%, which is the result of continuous efforts to improve the quality of service and process improvements. The Bank's priority is to create the best possible customer experience and minimise the number of complaints through continuous service improvements.

In 2024, some communication channels failed to meet accessibility requirements. The Bank failed to provide an option to contact the helpline with the assistance of a sign language interpreter. Some clients who called the helpline were advised to visit a bank branch, including:

- individuals who were fully or partially incapacitated, or their guardians,
- individuals who were under 18, whose legal guardian lodged an objection in the CES system,
- individuals acting as attorneys-in-fact, including for those with special needs, whose power of attorney was not found in the CES system,
- individuals declared bankrupt.

The standard procedure at Alior Bank is to handle complaints no later than 15 working days for payment services or 30 calendar days for other cases¹². The response to the complaint is provided in writing, in paper form. Upon the client's request, the reply may also be delivered via Internet Banking or SMS.

Each complaint is thoroughly reviewed, and when responding to rejected complaints, Alior Bank provides a detailed explanation of its position, referencing, for example, the content of agreements, terms and conditions, or the fee and commission schedule. If, despite the provided explanations, the client disagrees with Alior Bank's decision, they may appeal the response by submitting a new complaint to the Bank or by lodging an appeal with the Alior Bank Client Ombudsman. A client who is dissatisfied with how



a complaint has been resolved is also entitled to approach the Bank Consumer Arbitration at the Polish Bank Association or the Financial Ombudsman.

If the Alior Bank Client Ombudsman agrees with the client and identifies faults in the product, processes, or service quality, the issue must be addressed and brought into compliance with the agreements, terms and conditions, and fee schedules. If the Ombudsman determines that the issue may affect a larger group of clients, they issue a special recommendation addressed to the Change Recommendations Committee. If the complaint review reveals a significant operational risk, the issue is referred to the Operational Risk Committee.

Additionally, the Change Recommendations Committee and the Operational Risk Committee may receive information and recommendations from the Complaints Team, based on the analysis of individual cases as well as broader trends and client reports.

Alior Bank identifies issues and monitors the effectiveness of corrective measures through NPS surveys that assess client loyalty and satisfaction. A low NPS indicates a potentially dissatisfied client, which could negatively impact client loyalty and the company's image. By implementing remedial measures in areas identified by clients, the Bank can improve its performance and strengthen client trust. The survey provides valuable feedback needed for planning measures in specific business areas.

Alior Leasing

Alior Leasing's services are not aimed at individual clients; the company serves exclusively corporate clients.

¹²In exceptionally complex situations this period may be extended.



Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

S4-4

Actions related to material impacts on consumers are developed and implemented separately for each member of the Alior Bank Group. Following the double materiality assessment completed at the end of the reporting period, actions related directly to the identified material impacts will be implemented by the Group members in the coming years. Accordingly, no resources have been allocated for the management of significant impacts in 2024. The activities related to material risks are described in the Consolidated Financial Statements of the Alior Bank Group for the year ended 31 December 2024 (note 40).

Alior Bank

Alior Bank analyses client complaints and reports, identifies their causes, and implements corrective actions to improve product quality. The company focuses on:

- monitoring the number of complaints
- developing detailed reports in the case of multiple complaints about a specific product or process
- developing recommendations for corrective actions and forwarding them to product, process, and IT system owners
- controlling the implementation of corrective actions and linking the complaints to the business targets set by the product or service owners
- mystery shopping and customer service quality surveys.

Alior Bank prevents the negative effects of its products by ensuring compliance with legal requirements, supervisory authority recommendations, industry best practices, and internal regulations. When developing new products and services, the Bank prioritises protection of clients' interests, specifically by consulting relevant company units to maintain the highest standards of regulatory compliance.

The company regularly conducts NPS surveys and uses the results to formulate recommendations for its business units, aiming to enhance positive impacts on clients. Every quarter survey findings are reviewed in a meeting of the Management Board, Managing Directors, and Product Owners to help guide future development.



Marketing materials are prepared in consultation with product departments and relevant organisational units of the Head Office. Additionally, marketing campaign assumptions are reviewed to identify potential events that could negatively impact the Bank's reputation.

More information on actions addressing identified risks concerning consumers is provided in the Consolidated Financial Statement of Alior Bank Group for the year ended on 31 December 2024 (note no. 40).

Alior Leasing

Alior Leasing's services are not aimed at individual clients; the company serves exclusively corporate clients.



Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S4-5

In 2024, the Alior Bank Group companies did not have consistent targets, compliant with the ESRS minimum disclosure requirements, related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.

Alior Bank

When it comes to managing material impacts, the goal of Alior Bank is to:

- support clients in resolving complex and multidimensional issues at every stage of their relationship with Alior Bank. To achieve this goal, the company has appointed the Alior Bank Client Ombudsman
- ensure fair and simple communication with clients, as well as education on digitisation, security, and financial services. To achieve this goal, the company has adopted Responsible Marketing Practices
- ensure that all products and processes align with clients' needs and expectations while maintaining compliance with legal requirements and internal procedures. To achieve this goal, Alior Bank has adopted Procedures for Launching, Modifying, and Withdrawing Products and Services at Alior Bank S.A. These procedures define client needs, market depth analysis, revenue model, and other variables.

When developing products and processes, the Bank considers client expectations and needs, maintaining compliance with legal requirements and internal procedures.

The Bank has not defined any metrics for assessing the achievement of its targets. Consumers were not involved in target setting, however, Alior Bank takes their feedback into account when developing new banking products. Information on client needs comes from focus group interviews, surveys, reports from internal units responsible for customer service, and insights from Alior Bank's external partners.

Alior Leasing

Alior Leasing's services are not aimed at individual clients; the company serves exclusively corporate clients.



IV

Governance information





BUSINESS CONDUCT

ESRS G1

Business conduct policies and corporate culture

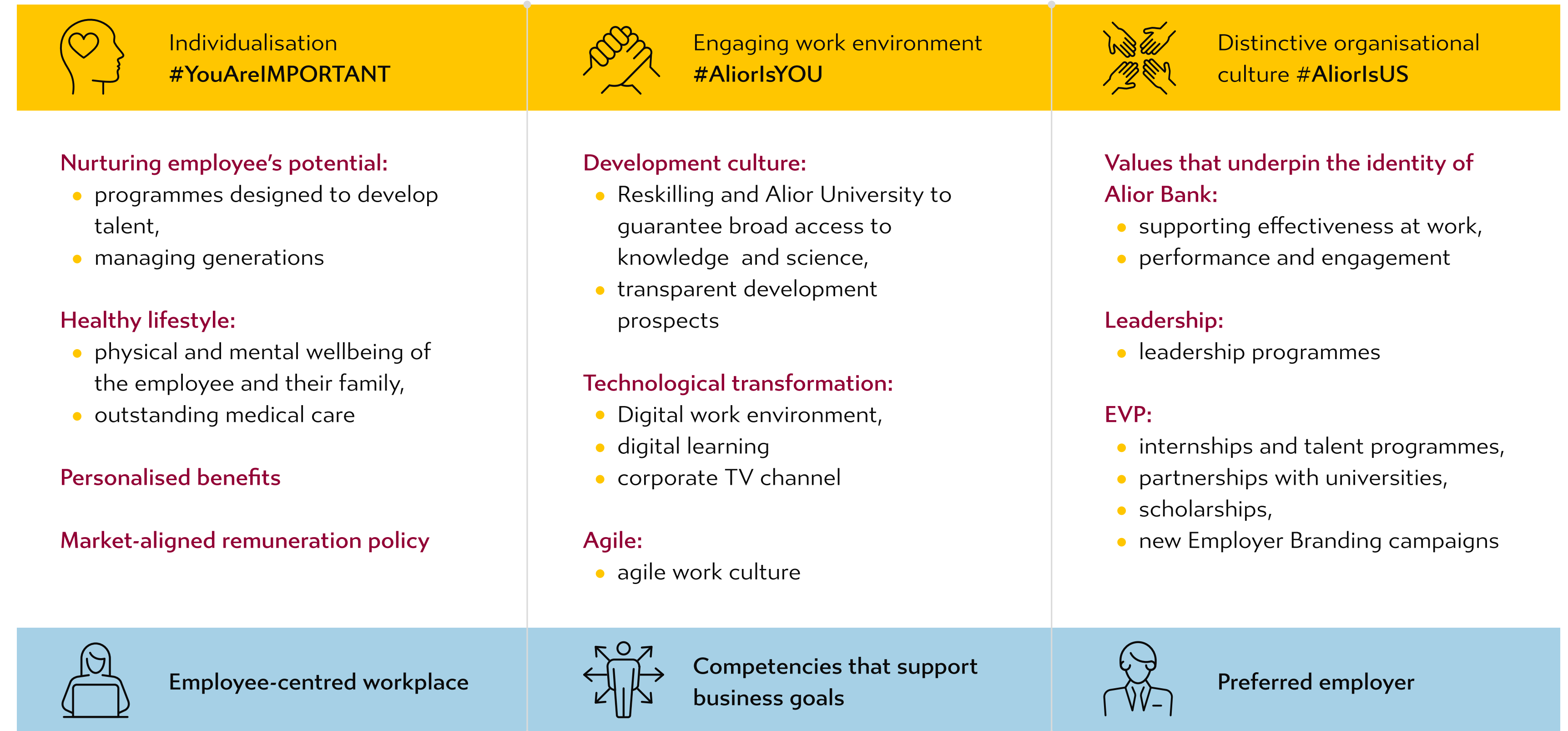
G1-1

Development of corporate culture

The development of the corporate culture within the Alior Bank Group is aligned with the unique characteristics of its member companies.

At Alior Bank, the HR strategies that underpin its corporate culture are aligned with the company's business strategy. In 2024, the Bank pursued a strategy titled "Bank for Every Single Day, Bank for the Future", with the employee-focused area built on three pillars: an individualised approach to employees, an engaging work environment, and a distinctive organisational culture.

Alior Bank's corporate culture and strategic pillars





As part of the #AliorIsYOU pillar, the company offers its employees an engaging work environment and supports them through technological transformation and a digital work environment. The company provides, e.g. digital learning opportunities and a corporate TV channel along with a professional recording studio for broadcasting internal and external events (e.g. performance conferences). In line with the #AliorIsYOU pillar, Alior Bank aims to provide agile work methods, clearly defined development perspectives for employees, and broad access to knowledge and science through reskilling programmes and Alior University.

The #YouAreIMPORTANT pillar emphasises the value of a personalised approach and employee potential, with programmes designed to develop individual talent, foster intergenerational management, and promote initiatives that support the physical and mental wellbeing of employees and their families. Alior Bank offers comprehensive medical insurance packages, personalised employee benefits, and a market-aligned remuneration policy.

The #AliorIsUS pillar is aimed at both current and prospective employees. Through #AliorIsUS, the company promotes effective work, performance, and engagement, while strengthening leadership with dedicated programmes. The pillar supports prospective employees by partnering with higher education institutions, offering internships, talent programmes, and scholarships.

An important part of Alior Bank's corporate culture are its corporate values: responsibility, openness, innovation, and client orientation. These values shape the relationships with the Bank's clients and partners and guide employee interactions.

In 2024, to promote and strengthen these values, Alior Bank organised initiatives such as:

- Development Festival Week of Values: A series of 18 inspiring lectures and activities promoting the pillars of corporate culture. The online meetings gathered 7,248 participants
- Alior Summer Chill: A series of picnics for employees and their families organised in Gdańsk, Katowice, Kraków, Rzeszów, and Warsaw
- Make a Gift: A Christmas charity event where Alior Bank employees prepare gifts by children and seniors in need, as depicted in their letters to Santa.
- Blood donation events and registration of bone marrow donors
- Activities promoting health and a healthy lifestyle, such as vision and skin examinations, along with access to the Mindgram platform
- Facilitating voluntary work: The option to use 16 hours for volunteering with full compensation for that time
- A paid day off for medical examinations, excluding preliminary or periodic exams
- A tree-planting campaign in which the Brokerage's employees planted more than 1,000 trees.





Alior Bank's corporate culture and values are reinforced and promoted through the online platform, Alior University. Every employee of the company can access the platform to find information on:

- current training opportunities,
- development and educational programmes,
- reskilling and development initiatives implemented in partnership with particular business units of the Academy (e.g. Risk Academy, Investment Academy, Robotisation Academy),
- language courses,
- specialised training opportunities and development programmes aimed at managerial staff.

As part of its corporate culture, Alior Bank's strategy includes assessing engagement. The company aspires to exceed the national average. At the end of 2024, employee engagement was at 64%, with a turnout rate of 94%. Another metric used to evaluate the implementation of the Bank's values is the growth in client loyalty, assessed based on NPS, with a target score exceeding 45.

At Alior Leasing, the corporate culture is built and developed through the company's Diversity Policy and Human Rights Policy.

Raising concerns

Each member of the Alior Bank Group has its own defined mechanisms for identifying, reporting, and analysing concerns related to unlawful conduct or violations of internal policies. Both Alior Bank and Alior Leasing are subject to whistleblowing protection requirements.

All Alior Bank employees are subject to the Whistleblowing and Whistleblower Protection Policy¹³ and the Procedures for Reporting Unwanted Behaviour at Alior Bank.

The purpose of the Whistleblowing and Whistleblower Protection Policy is to prevent irregularities in the workplace as specified in the Labour Code, the Workplace Regulations of Alior Bank SA, the Code of Ethics¹⁴, and the Directive (EU) of the European Parliament and of the Council on the protection of persons who report breaches of Union law. The Policy defines internal channels for submitting non-anonymous or anonymous reports of alleged breaches, ensuring safe reporting, including confidentiality and anonymity. Employees can report concerns through the following channels:

- dedicated phone number, ensuring safe reporting, including confidentiality and anonymity,
- internal ICT system,
- traditional written report,
- face-to-face meeting or a report to President of Management Board.

The ultimate decision rests with the employee. If the potential violation involves a member of the Management Board, the report should be submitted in writing and addressed specifically to the Supervisory Board.

According to the Policy, upon receiving a report, President of the Management Board of Alior Bank designates employees or organisational units responsible for investigating the report and taking follow-up steps. The President is supported in this process by the Regulatory Compliance Department. Employees of this Department conduct an initial review of the report and recommend further actions. The Ethics Team or Committee, appointed to coordinate the proceedings, has a maximum of three months from the date of receipt to investigate the report. In justified cases, this timeframe may be extended.

The Policy requires employees of the Regulatory Compliance Department to remain fair and objective, conduct and document interviews, gather necessary evidence, and formulate an opinion that includes an analysis of events, an assessment of whether the report is justified, and conclusions with recommendations for further action. The Department's final report is submitted to designated members of the managerial staff, with recipients selected based on the specific circumstances of the case.

The review proceedings and all disclosed information remain confidential both during and after the process.

The Whistleblowing and Whistleblower Protection Policy explicitly prohibits any form of retaliation against whistleblowers or witnesses. The protection extends to employees who assisted the whistleblowers in making a report, as well as anyone connected to the report or involved in the review proceedings. The prohibition of retaliation remains in effect even if, upon investigation, it is determined that the report made in good faith was unjustified.

Alior Bank has posted the Policy on its website and educates employees on its contents. Employees receive training on the reporting channels and methods, as well as the protections available to them. Each new employee is required to complete the "Management of Non-Compliance Risk" training and formally acknowledge that they have read the Whistleblowing and Whistleblower Protection Policy.

¹³The whistleblower reporting and protection policy is available at: <https://www.aliorbank.pl/dam/jcr:277cc48e-4572-414b-8c16-d84d5b48dfd4/polityka-zglaszania-naruszen-i-ochrony-sygnalistow.pdf>

¹⁴The Code of Ethics is available at: <https://www.aliorbank.pl/dam/jcr:8ed0db4d-92da-4130-85be-39fb16c36876/kodeks-etyki-alior-banku.pdf>



In addition to the above Policy, the Procedures for Reporting Unwanted Behaviour at Alior Bank outline how the Ethics Committee should proceed upon receiving a complaint concerning unwanted behaviour, including discrimination, mobbing, harassment, or sexual harassment. The procedure does not provide training on how to receive notifications for those who receive them. In its proceedings, the Committee adheres to the principle of impartiality. Its role is to conduct an objective review of the reported circumstances and, if necessary, issue appropriate decisions to ensure the work environment complies with both external and internal regulations.

As outlined in the Procedures, unwanted behaviour may be reported through the channels specified in the Whistleblowing and Whistleblower Protection Policy, as well as by email at naruszenia@alior.pl or by post to Alior Bank's address. Upon initial review, each complaint is investigated by a dedicated Ethics Committee appointed by Managing Director of the HR Division, Regulatory Compliance Director, and Director of the relevant HR BP Department (depending on the origin of the complaint). The Committee consists of representatives from the Regulatory Compliance Department and HR Division, who are responsible for employer-employee relationships, Network HR BP Department, and Head Office HR BP Department (depending on the origin of the complaint).

After completing the review process, the Ethics Committee determines whether the complaint is justified and prepares a final report with case analysis and recommendations. This report is presented to President of the Management Board and the Member of the Management Board responsible for the complaint before any recommended follow-up steps are taken. The bank plans to introduce a survey for those using the internal whistleblowing channel in 2025 to monitor its effectiveness.



At Alior Leasing, the procedures for identifying, reporting, and investigating concerns about unlawful conduct or violations of internal regulations are set out in the Alior Leasing Whistleblowing and Whistleblower Protection Policy, the Code of Ethics, and the Instructions for Managing Conflicts of Interest. According to these regulations, Alior Leasing employees can report violations of ethical rules in the following ways:

- via email at: etyka@aliorleasing.pl,
- by post to the Compliance Department
- in person to employees of the Compliance Department.

If the report involves a member of the Management Board, the report should be submitted in writing and addressed specifically to the Supervisory Board.

As outlined in the Alior Leasing Whistleblowing and Whistleblower Protection Policy, reports can be reviewed through one of the following procedures:

- simplified procedure: reports are reviewed by two Compliance employees. Reports reviewed through this procedure involve compliance issues, including violations of the Alior Leasing Compliance Policy, the Alior Leasing Code of Ethics, and the Alior Leasing Policy for Managing Conflicts of Interest,
- basic procedure: reports are reviewed by a Review Team with a standard personal composition,
- expert procedure: reports are reviewed by a Review Team comprising representatives from areas related to the subject matter of the report. This procedure is used for complex reports, where the review requires expertise in the relevant area.

When reviewing reports, members of the Review Team are required to maintain confidentiality and remain objective, impartial, and independent. The role of the Team is to conduct a thorough analysis of events, objectively determine whether the report is justified, and prepare a report for the Alior Leasing Management Board with its findings and recommendations for further actions.

Similar to Alior Bank, Alior Leasing's regulations prohibit any form of retaliation against whistleblowers, witnesses, or members of the Review Team.

The Alior Leasing Whistleblowing and Whistleblower Protection Policy is available on the company website, as well as on the AL Net intranet, alongside the Code of Ethics and procedures for preventing conflicts of interest.

Animal welfare

The Alior Bank Group is not engaged in any activities related to animal welfare. As a result, this area is not covered in any of the company's strategic documents or reports. The Group has no plans to introduce policies addressing such issues.



Prevention and detection of corruption and bribery

G1-3

Within the Alior Bank Group, the prevention of corruption is regulated separately for each company.

Alior Bank has adopted an Anti-Corruption Policy that sets out the rules to be followed in internal relationships and interactions with clients, business partners, and members of the Alior Bank Group. Additionally, the Policy outlines the procedures to be followed in the event Alior Bank becomes aware of any act of corruption in internal or external relationships. The company enforces a strict 'zero tolerance for corruption' policy, with no tolerance for acts of corruption, and actively combats all forms of corruption across its operations. The Policy explicitly prohibits employees from offering, promising, or accepting, directly or indirectly, any financial or personal gains, as well as from granting or receiving financial, personal, or other non-financial forms of gratification. Any form of retaliation against an individual who refuses to accept or grant an undue benefit is strictly prohibited. Moreover, the Anti-Corruption Policy outlines the rules to be followed in interactions with clients and business partners regarding business gifts granted or accepted by employees of the Bank, and also governs sponsorships and donations. The Bank manages potential and actual conflicts of interest according to the Policy for Managing Conflicts of Interest. According to this Policy, the managerial function must be separate from the control function. Reports to the competent bodies are submitted according to Alior Bank's Management Information System.

There is no direct reference to the UN Convention against Corruption in the Policy.

All Alior Bank employees are required to read the Policy and complete anti-corruption training, repeated annually. The company has not identified any roles that are exposed to a higher risk of corruption.

The Bank has one training on anti-corruption in the form of e-learning, which has been made available at the Bank in October 2024.

In accordance with the provisions of the Anti-Corruption Policy, the Bank recognises that all persons working for the Bank, irrespective of the form of employment/cooperation and the place occupied in the Bank's organisational structure, should be equally familiar with all the anti-corruption principles referred to in the policy, which is why the training is dedicated to all employees.

The training defines the principles of conduct aimed at counteracting corruption in internal relations or in relations with Clients, Contractors, the Bank's business partners or entities from the Alior Bank S.A. Group and applies to every activity undertaken by the Bank.

The training defines the basic concepts of activities of a corrupt nature, such as economic corruption, personal benefit, paid patronage, extortion, fraud, among others, and includes numerous examples of circumstances indicating a possible risk of corruption in the framework of: cooperation with contractors, gift policy, sponsoring and donations, the Bank's participation in public procurement or conduct in internal relations.



Every employee of the Bank is equally responsible for counteracting the phenomenon of corruption and is obliged, in the event of a suspected case of corruption or attempted corruption, to immediately inform the Anti-Corruption Coordinator at naruszenia@alior.pl.

Upon completion of the training, the employee declares that he/she has familiarised himself/herself with the Anti-Corruption Policy and undertakes to adhere to it unconditionally and to report any suspected violation of the Anti-Corruption Policy in accordance with the content of the Policy.

Since the launch of the e-learning on the platform, 2049 employees have completed the training.

Prior to the launch of the training focused exclusively on corruption, the area of corruption was part of the compliance risk management training, which addressed issues such as the gift policy, giving and accepting gifts, inviting Customers/Contractors to meals and events and attending events at the invitation of a Customer/Contractor.

As part of the regular initial training on compliance risk management, 1,050 new employees of the Bank were trained and 2,389 employees (in the group dedicated to renewal) completed renewal training.

The Anti-Corruption Policy is available on the company website and can also be accessed by employees on the company intranet. Additionally, Alior Bank regularly reinforces the rules for corruption prevention. Employees can report violations of the Policy through the channels specified in the Whistleblowing and Whistleblower Protection Policy. The provisions of that Policy also govern the review proceedings. In the review process, Alior Bank separates the control functions from the managerial functions in line with the principles outlined in the Policy for Managing Conflicts of Interest. Reports

detailing the findings from the review of alleged corruption involving administrative, managerial, or supervisory bodies are prepared according to the company's Management Information System. The Anti-Corruption Policy includes control mechanisms, and the Bank conducts independent monitoring of these mechanisms through compliance testing.

The anti-corruption training must also be completed by members of the managerial and supervisory bodies of Alior Bank. Members of the Management Board and Supervisory Board receive the training materials in electronic form.

As for business conduct training, Alior Bank has adopted a Training and Development Policy. This Policy sets out the rules for cooperation between the business unit requesting training and the production unit responsible for delivering training materials. According to this Policy, the responsibility for the execution, contents, and settlement of the training rests with the business unit that requested it. The relevant areas are supported by Alior University through developmental events aimed at promoting and reinforcing Alior Bank's values.

At Alior Leasing, the rules governing interactions with business partners, granting or accepting gifts, participation in events, and cooperation with public authorities and institutions are outlined in the Instructions for Managing Conflicts of Interest. In this respect, 'Compliance' training is mandatory in the Company. In 2024 in Alior Leasing an Anti-Corruption Policy has been prepared but not implemented. In February 2025, it was being processed for resolution by the Supervisory Board. The Policy outlines general rules aimed at preventing corruption in internal and external relationships, including guidelines for sponsorships and procedures to be followed in the event of any corrupt practices.

Employees of the company are obliged to report suspicions of corruption according to the Alior Leasing Whistleblowing and Whistleblower Protection Policy. The Review Team is appointed in accordance with the Policy and consists of employees designated on an ad hoc basis. A separate team is appointed for managerial functions as it cannot include any members of the managerial staff. Additionally, members of the team formally acknowledge that there is no conflict of interest. The company believes that this ensures there is no unwanted connection to the case under review.

According to the Alior Leasing Whistleblowing and Whistleblower Protection Policy, as with any other case handled by Review Teams, information on closed corruption proceedings is forwarded to the Management Board and the Supervisory Board.





Training on anti-corruption matters, including rules for granting and accepting gifts, inviting to and participating in events, reporting irregularities or violations, is provided in electronic form by the Compliance Unit and can be accessed by employees on the training platform. The training is mandatory for all employees, including members of the Management Board, senior-level officers, and the Supervisory Board¹⁵. The level of achievement is assessed through a final knowledge test. The training is the same for all roles and functions, as Alior Leasing has not identified any roles exposed to a higher risk of corruption or bribery. In addition to anti-corruption training, the Compliance Unit also conducts training on non-compliance, ethical issues, preventing conflicts of interest, and reporting violations.

Employees can access the anti-corruption documents (Alior Bank Whistleblowing and Whistleblower Protection Policy and Instructions for Managing Conflicts of Interest) on the company intranet. Additionally, the Alior Leasing Whistleblowing and Whistleblower Protection Policy is available on the company website. Once the company adopts an Anti-Corruption Policy, it plans to publish it on its website.

Incidents of corruption or bribery

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In 2024, no incidents of corruption or bribery were recorded in the Alior Bank Group.

Number of convictions and amounts of fines for violations of anti-corruption and anti-bribery legislation

the number of convictions	0
the amount of fines	0 PLN
actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery	Not applicable



¹⁵ Members of the Management Board and Supervisory Board of Alior Leasing receive the training materials in electronic form.



Cybersecurity

(ENTITY-SPECIFIC DISCLOSURE)

The Alior Bank Group's digital security is managed across the organisation to ensure IT security, in line with industry best practices. The individual solutions used by Group entities are tailored to the specific nature of each company's activities.

Alior Bank

Through its implemented cybersecurity processes, Alior Bank ensures the security of client data and funds. The Bank has up-to-date information on the security of its IT environment and is able to take systematic measures to mitigate risks in this area.

In accordance with the National Cybersecurity System Act, Alior Bank holds the status of Key Service Operator. The company fully complies with all cybersecurity requirements set by law and the recommendations of the Polish Financial Supervision Authority (KNF). The Bank ensures comprehensive and effective protection against cyber threats. The company has a comprehensive information security management system (ISMS) in place, including metrics such as the number of cyber-attacks carried out and blocked, which are not disclosed in detail by the parent company in the Alior Bank Group. The Company has internal targets related to cyber security. These were adopted prior to the date of the European Sustainability Reporting Standards and are therefore not aligned with the requirements of these standards.

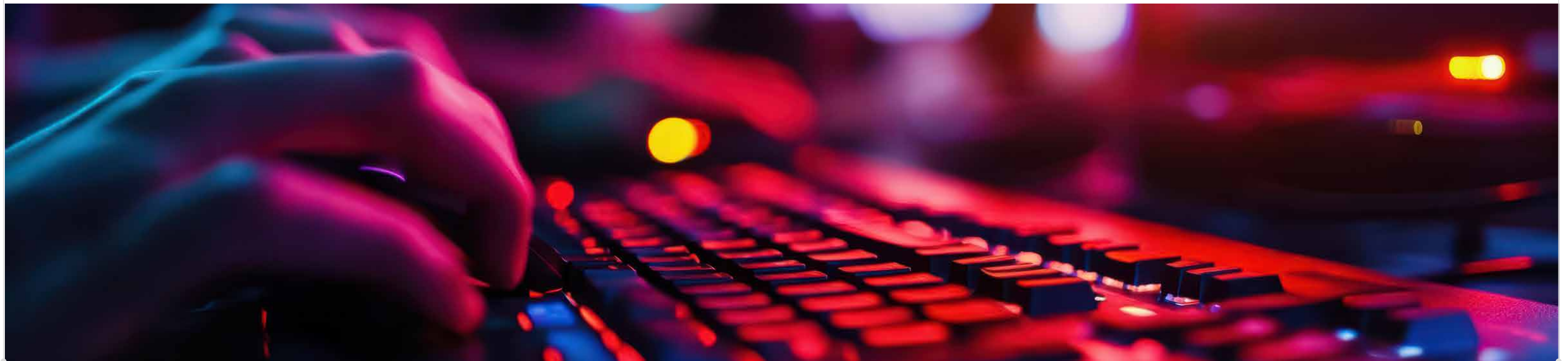
In 2024, Alior Bank implemented cybersecurity risk estimation tools and established procedures to ensure the early detection and effective management of risks. The company has also developed IT incident response plans designed to minimise the impact of cyberattacks on critical services and prevent identity theft. Additionally, cybersecurity information is reported periodically to the Management Board.

All of Alior Bank's key IT systems that process client data and facilitate financial transactions undergo thorough external and internal manual security tests. Every three months, the Bank also conducts an automated vulnerability scan for cyberattacks, with the results providing comprehensive insights into the security state of the IT environment and enabling systematic risk mitigation.

In addition, Alior Bank's team of specialists monitors the security of banking infrastructure and clients' financial transactions 24/7. The company's experts also track emerging threats and analyse cybersecurity trends, making necessary adjustments to internal security systems.

All Alior Bank employees regularly undergo mandatory training to raise awareness of IT security risks. The training materials are reviewed annually and updated as needed. Additionally, training courses, which conclude with a knowledge test, are mandatory for every new employee. Cyber threat awareness is further promoted through email communications and information provided on the intranet platform.

Each year, Alior Bank's IT teams conduct controlled phishing tests targeting employees. Those who fail to meet the required standards must retake dedicated training in this area. The results of these tests are analysed and incorporated into training materials.





Alior Bank is also committed to raising awareness about security and IT threats among its clients. Materials on potential threats are regularly published on the Bank's homepage, social media platforms, newsletters, and mobile app. Additionally, Alior Bank has launched a dedicated website for cybersecurity, Phishing-Stop. The Bank also collaborates with the Polish Bank Association and engages in media partnerships to carry out further activities in this area. Alior Bank plans to expand its educational initiatives aimed at clients.

Alior Leasing

Alior Leasing has implemented cybersecurity protection systems and comprehensive procedures to ensure the early detection of threats. The company also utilises cybersecurity risk estimation tools. Similar to Alior Bank, Alior Leasing does not disclose details regarding its methods for protecting IT assets or information about the number and types of attacks carried out and blocked on its digital systems. Cybersecurity issues are regularly reported to Alior Leasing's Management Board.

All of Alior Leasing's key systems undergo static security tests before installation in test environments and dynamic tests after installation. If necessary, additional tests are conducted by external firms. The company performs quarterly vulnerability scans of its IT environment, and the knowledge of potential security gaps allows Alior Leasing's IT teams to respond effectively to emerging threats. The company's digital security unit also monitors emerging threats in the market and analyses trends in the activities of cybercrime groups. Based on its observations, IT protection systems

are updated and optimised.

Everyone at Alior Leasing is familiar with cyber threats and the basic methods for minimising cyber risks. Information on this topic is provided to all new employees, and the training materials are reviewed and updated annually as needed. In addition, training videos and information on IT threats are available to all staff on an intranet subpage managed by the cybersecurity unit. If there is an increase in phishing campaigns or identified attempts at social engineering attacks, Alior Leasing employees receive relevant alerts via email.



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