



INFORMATION ON CAPITAL ADEQUACY OF

Santander Bank Polska Group
as at 31 December 2025

I. Introduction	4
1. Capital Group	6
2. Outline of the differences in the scopes of consolidation	8
II. Risk Management.....	10
1. Objectives and strategies for risk management – general	10
2. Objectives and strategies for risk management – by risk category	17
Credit risk, Counterparty credit risk	17
Market risk	19
Liquidity risk	26
Operational risk	29
Compliance Risk	32
III. Own funds	36
1. Tier I	41
Common Equity Tier I	41
Adjustments and deductions from Common Equity Tier I	44
2. Tier II	45
Subordinated liabilities.....	45
3. Own funds and eligible liabilities	46
IV. Capital requirements	49
1. Total capital requirements	49
2. Credit risk	52
The structure of the exposure	52
Overdue and impaired items.....	59
Credit risk mitigation.....	60
Allocating risk weights to the credit portfolio	61
3. Counterparty credit risk	63
The structure of the exposition	63
Conterparty credit risk mitigation	64
4. Credit valuation adjustment risk	65
5. Market risk	66
V. Capital buffers.....	67
VI. Capital adequacy	74
1. Capital adequacy management	74

2. Regulatory capital adequacy	76
3. Internal capital adequacy	77
VII. Securitisation	78
VIII. Leverage ratio	85
IX. Encumbered assets and unencumbered assets	88
X. Liquidity risk measures	90
XI. ESG risks	93
XII. Events after the reporting date.....	105

I. Introduction

This document fulfils the Information Strategy of the Santander Bank Polska S.A. Capital Group resulting from the provisions of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, as amended (hereinafter referred to as CRR), including those introduced by Regulation (EU) 2019/876 of 20 May 2019 and Regulation (EU) 2024/1623 of 31 May 2024, which formed the legal basis of the reporting date i.e. 31 December 2025.

Since 1 January 2014, by decision of the European Parliament and of the Council (EU), the provisions of the so-called CRD IV/CRR package, comprising the CRD IV directives and the CRR regulation, have been in force. Amendments to these provisions have been introduced by subsequent regulatory packages, including CRD V/CRR II and CRD VI/CRR III. The Act of 5 August 2015 on macroprudential supervision of the financial system and crisis management in the financial system implements the provisions of the CRD IV Directive into the Polish legal system. The regulations are directly applicable in all Member States of the European Union.

As at 31 December 2025, Santander Bank Polska S.A. is the significant subsidiary of Banco Santander S.A. with its seat in Spain, which is the EU parent institution. Santander Bank Polska S.A. discloses information about the capital adequacy on a consolidated basis – at the highest local level of prudential consolidation – i.e. based on the data of Santander Bank Polska S.A. Group.

The objective of the report is to present information on the capital adequacy of the Santander Bank Polska S.A. Capital Group in accordance with the requirements set out in Article 13 of the CRR. The information is published in accordance with Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council (EU) No 575/2013 with regard to the public disclosure by institutions of information referred to in Part Eight, Titles II and III of that Regulation and repealing Commission Implementing Regulation (EU) 2021/637.

The data presented in the report have been prepared as at 31 December 2025. The information contained refers to the above regulations insofar as they apply to the Bank and the Santander Bank Polska S.A. Group. Unless otherwise stated, the figures presented in the Report are expressed in thousands of PLN. Any differences in totals and shares result from the presentation of the amounts with the specified precision.

Information on the remuneration policy pursuant to Article 450 of the CRR, which forms part of this report, is presented in a report entitled "Information on remuneration pursuant to Article 450 of the CRR of the Santander Bank Polska S.A. Group as at 31 December 2025".

This report and its appendix are available on the Santander Bank Polska website under the Investor Relations section and on the website of the European Banking Authority: <https://edap-public.eba.europa.eu/>.

Disclosure of capital adequacy	Guidelines on disclosures	Article of CRR
I. Introduction		
2. Capital Group		
3. Outline of differences in consolidation	Scope of application of the regulatory framework	Article 436
II. Risk Management	Risk management, objectives and policies	Article 435 (1), 446 (1), (2), 448, 451a (4)
III. Own funds	Own funds	Article 437 point a-f), 436 point e), 444 point e)
	Own funds and eligible liabilities	Article 438 point b), d), 447
IV. Capital requirements	Capital requirements	
1. Total capital requirements		Article 442, 453 a-e)
2. Credit risk	Credit risk and its mitigation	Article 444
	ECAI	Article 439 point e-m), 444 point e)
3. Counterparty credit risk	Counterparty credit risk	Article 445
4. Market risk	Market risk	Article 445a (1) point a-b), (3) point a)
V. Capital buffers	Macroprudential supervisory measures	Article 440
VI. Capital adequacy		Article 438
1. Capital adequacy management		
2. Regulatory capital adequacy		
3. Internal capital adequacy		Article 438 point a)
VII. Securitisation	Exposure to securitization positions	Article 449
VIII. Leverage ratio	Leverage ratio	Article 451
IX. Encumbered assets and unencumbered assets	Unencumbered assets	Article 443
X. Liquidity risk measures	Liquidity information	Article 435 (1), 448 (1), 451a (2),(3)
XI. ESG risks	Disclosure of environmental, social and corporate governance risks (ESG risks)	Article 449a
N/A	Disclosure of information on own funds requirements and risk-weighted exposure amounts	Article 438 point c), da), e), f), g), h)
N/A	Specialised lending	Article 441
N/A	Indicators of global systemic importance	Article 452
N/A	The IRB approach for credit risk purpose	Article 453 j), g)
N/A	The Advanced Measurement Approaches to operational risk	Article 454
N/A	Internal market risk measurement models	Article 455
N/A	Disclosure of aggregate exposure to shadow banking entities	Article 449 point b)
N/A	Disclosure of crypto-asset exposures and related activities	Article 451b

1. Capital Group

Santander Bank Polska S.A. forms a Group with following subsidiaries which are consolidated in accordance with IFRS 10 and associates which are accounted for using the equity method.

K_64.02 - EU LI3 – OUTLINE OF THE DIFFERENCES IN THE SCOPES OF CONSOLIDATION (ENTITY BY ENTITY) AS AT 31 DECEMBER 2025

Name of the entity	Method of accounting consolidation	Method of prudential consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	
Santander Factoring Sp. z o.o.	Full consolidation	X				Factoring activities
Santander F24 S.A.	Full consolidation	X				Lending activities
Santander Leasing S.A.	Full consolidation	X				Leasing activities
Santander Finanse Sp. z o.o.	Full consolidation	X				Financial, leasing and insurance brokerage
SPVXX04062025 Sp. z o.o. in liquidation	Full consolidation	X				Acquisition and disposal of shares and stocks in commercial companies and other securities. Activities related to seeking investors
						Management: open-ended investment funds and specialised open-ended investment funds, non-public closed-ended investment funds and portfolios comprising one or more financial instruments
Santander Towarzystwo Funduszy Inwestycyjnych S.A.	Full consolidation	X				
Santander Allianz Towarzystwo Ubezpieczeń S.A.	Equity method consolidation			X		Insurance activities, personal and property insurance
Santander Allianz Towarzystwo Ubezpieczeń na Życie S.A.	Equity method consolidation			X		Insurance activities, life insurance
						Granting credit guarantees, investing and managing entrusted funds, financial activities (granting loans)
Polfund - Fundusz Poręczeń Kredytowych S.A.	Equity method consolidation			X		Training and consulting activities, promotional activities, supporting initiatives promoting entrepreneurship.

Compared to the state as of 30 June 2025, the list of subsidiaries of Santander Bank Polska S.A. decreased by seven entities as a result of the sale of all shares in Santander Consumer Bank S.A. (SCB S.A.) held by the Bank. In addition to SCB S.A., the following subsidiaries of the Bank were deconsolidated:

- Santander Consumer Multirent Sp. z o.o. (SCM Sp. z o.o. – a subsidiary of SCB S.A.);
- Santander Consumer Financial Solutions Sp. z o.o. (a subsidiary of SCM Sp. z o.o.);
- SCM Poland Auto 2019-1 DAC (a subsidiary of SCM Sp. z o.o.);
- SC Poland Consumer 23-1 DAC (subsidiary of SCB S.A.);
- Stellantis Financial Services Polska Sp. z o.o. (subsidiary of SCB S.A.);
- Stellantis Consumer Financial Services Sp. z o.o. (subsidiary of Stellantis Financial Services Polska Sp. z o.o.).

The owners of Santander Towarzystwo Funduszy Inwestycyjnych S.A. (Santander TFI S.A.), i.e. Santander Bank Polska S.A. and Banco Santander S.A., were part of the global Santander Group until 9 January 2026 and held an equal 50% stake in the company's share capital. In 2025, Santander Bank Polska S.A. exercised control over Santander TFI S.A. within the meaning of International Financial Reporting Standard 10 (IFRS 10), as it had the practical ability to unilaterally direct the relevant activities of TFI. In addition, as the main business partner and distributor of investment products, it had a significant influence on the operations and results of Santander TFI S.A. At the same time, Santander Bank Polska S.A., through its ownership interest, was exposed to and had the right to variable returns generated by Santander TFI S.A. Taking into account the guidance in IFRS 10, paragraph B18, the Bank's Management Board assessed that, taking into account the legal requirements applicable to Santander TFI S.A. and its activities, it had the practical ability to unilaterally direct the relevant activities of Santander TFI S.A., even if it did not have a contractual right to do such. The Bank could effectively shape the composition of the Supervisory Board and, through it, the composition of the Management Board of Santander TFI S.A., i.e. the bodies making decisions concerning the significant activities of Santander TFI S.A. It should therefore be concluded that, having the power and the right to variable returns (benefits), the Bank exercised control over Santander TFI S.A. The transaction finalised by Banco Santander S.A. on 9 January 2026 involving the sale of 49% of the shares in Santander Bank Polska S.A. and 50% of the shares in Santander TFI S.A. to Erste Group Bank AG (Erste Group) did not affect the Bank's assessment of its control over Santander TFI S.A.

On 27 June 2025, the Extraordinary General Meeting of Shareholders of Santander Inwestycje Sp. z o.o. decided to commence the process of liquidation of the company as of 1 July, appoint a liquidator and change the name to SPV XX04062025 Sp. z o.o. in liquidation. The new name is effective as of 28 August 2025, i.e. from the moment of its registration in the National Court Register.

All subsidiaries of the Santander Bank Polska S.A. Capital Group as at 31 December 2025 are consolidated with the Bank in accordance with IFRS 10.

In the consolidated financial statements of Santander Bank Polska S.A. Group for 2024, the following companies are accounted for using the equity method in accordance with IAS 28:

- Santander Allianz Towarzystwo Ubezpieczeń S.A.
- Santander Allianz Towarzystwo Ubezpieczeń na Życie S.A.
- POLFUND – Fundusz Poręczeń Kredytowych S.A.

Compared with 31 December 2024, the list of associates did not change.

Detailed information on the structure of the Santander Bank Polska S.A. Capital Group and the sale of Santander Consumer Bank S.A. referred to above is included in the report entitled "Management Board Report on Santander Bank Polska Group Performance in 2025 (including the Report on Santander Bank Polska S.A. Performance)".

2. Outline of the differences in the scopes of consolidation

At Santander Bank Polska S.A. Group, there are no differences between consolidation for regulatory purposes and consolidation for accounting purposes in terms of entity structure. There are no subsidiaries which would not meet the definition of an institution, a financial institution or an ancillary services undertaking, which, as indicated in the CRR, could result in consolidation differences.

K_64.01 - EU LI1 – DIFFERENCES BETWEEN THE ACCOUNTING SCOPE AND THE SCOPE OF PRUDENTIAL CONSOLIDATION AND MAPPING OF FINANCIAL STATEMENT CATEGORIES WITH REGULATORY RISK CATEGORIES AS AT 31 DECEMBER 2025 (PLN K)

	Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items				Not subject to own funds requirements or subject to deduction from own funds
			Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	
Breakdown by asset classes according to the balance sheet in the published financial statements							
1 Cash and balances at central banks	30 504 739	30 504 739	30 504 739	0	0	0	0
2 Loans and advances to banks	2 371 648	2 371 648	2 371 648	0	0	0	0
3 Financial assets held for trading	15 278 611	15 278 611	0	10 949 909	0	14 292 745	0
4 Hedging derivatives	2 023 727	2 023 727	0	1 840 169	0	1 840 169	0
5 Loans and advances to customers	162 837 725	162 837 725	133 573 909	10 347 552	18 916 264	0	0
6 Buy-sell-back transactions	4 417 364	4 417 364	0	3 811 731	0	0	0
7 Investment securities	78 865 681	78 865 681	78 865 681	0	0	0	0
8 Assets pledged as collateral	2 575 358	2 575 358	0	2 575 358	0	2 575 358	0
9 Investments in associates	990 738	990 738	990 738	0	0	0	0
10 Intangible assets	987 651	987 651	634 162	0	0	0	353 489
11 Goodwill	1 688 516	1 688 516	0	0	0	0	1 688 516
12 Property, plant and equipment	764 514	764 514	764 514	0	0	0	0
13 Right of use assets	542 586	542 586	542 586	0	0	0	0
14 Current income tax assets	0	0	0	0	0	0	0
15 Net deferred tax assets	666 797	666 797	666 797	0	0	0	0
16 Assets classified as held for sale	8	8	8	0	0	0	0
17 Group assets classified as held for sale	0	0	0	0	0	0	0
18 Other assets	3 634 415	3 634 415	3 634 415	0	0	0	0
Total assets	308 150 078	308 150 078	252 549 198	29 524 718	18 916 264	18 708 272	2 042 005
Breakdown by liability classes according to the balance sheet in the published financial statements							
1 Deposits from banks	2 847 280	2 847 280	0	0	0	0	0
2 Hedging derivatives	192 875	192 875	0	155 922	0	155 922	0
3 Financial liabilities held for trading	12 363 423	12 363 423	0	11 071 227	0	10 940 044	0
4 Deposits from customers	230 142 564	230 142 564	0	0	0	0	0
5 Sell-buy-back transactions	2 580 543	2 580 543	0	2 580 543	0	0	0
6 Subordinated liabilities	1 601 965	1 601 965	0	0	0	0	0
7 Debt securities in issue	14 513 671	14 513 671	0	0	0	0	0
8 Lease liabilities	389 100	389 100	0	0	0	0	0
9 Current income tax liabilities	1 072 135	1 072 135	0	0	0	0	0
10 Deferred tax liability	432	432	0	0	0	0	0
11 Other provisions	2 381 834	2 445 562	0	0	0	0	0
12 Other liabilities	4 559 028	4 495 300	0	0	0	0	0
Total liabilities	272 644 852	272 644 852	0	13 807 691	0	11 095 966	0

The differences in the table above are for presentation purposes only. They have no impact on the total assets, liabilities or equity of Santander Bank Polska S.A. Group in the light of accounting standards or regulatory requirements.

Santander Bank Polska S.A. Group does not identify any impediments to the prompt transfer of own funds or to the repayment of liabilities within the Group.

K_64.03 - EU LI2 – MAIN SOURCES OF DIFFERENCES BETWEEN REGULATORY EXPOSURE AMOUNTS AND CARRYING VALUES IN FINANCIAL STATEMENTS AS AT 31 DECEMBER 2025 (PLN K)

	Total	Items subject to			
		Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1 Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	308 150 078	252 549 198	18 916 264	29 524 718	18 708 272
2 Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	272 644 852	0	0	13 807 691	11 095 966
3 Total net amount under the scope of prudential consolidation	35 505 226	252 549 198	18 916 264	15 717 026	7 612 306
4 Off-balance-sheet amounts	75 881 260	75 881 260	0	0	
5 Differences in valuations	79 380	0	0	79 380	
6 Differences due to different netting rules, other than those already included in row 2	0	0	0	0	
7 Differences due to consideration of provisions	-131 728	-131 728	0	0	
8 Differences due to the use of credit risk mitigation techniques (CRMs)	-13 701 222	2 190 551	0	-15 891 773	
9 Differences due to credit conversion factors	-64 872 655	-64 872 655	0	0	
10 Differences due to Securitisation with risk transfer	-18 916 264	0	-18 916 264	0	
11 Other differences	8 828 643	1 252 965	0	7 575 678	
12 Exposure amounts considered for regulatory purposes	281 962 209	266 869 592	0	7 480 310	7 612 306

The key factor underlying the difference presented in the line 'Other differences' in the table above is the impact of the methodology of calculating the exposure to counterparty credit risk in accordance with CRR.

II. Risk Management

1. Objectives and strategies for risk management – general

Risk management objectives

The business activity of Santander Bank Polska S.A. Group is exposed to a number of risks defined as the possibility to impact the Bank's capacity to deliver its strategic objectives through some events. The main objective of risk management is to ensure that while the Group increases the shareholder value, it also takes risk consciously and controllably. This is done through introduction of a formal risk management system aimed to ensure that the Bank has adequate process for setting and delivering objectives in its business activity.

The risk management system ensures compliance with the respective legal requirements for risk management, in particular with the Banking Law Act and the requirements detailing its operation laid down in the Regulation of the Minister Finance, Development Funds and Regional Policy and the recommendations issued by the Polish Financial Supervision Authority (KNF). The risk management system is comprehensively described in the „Strategy for risk management in Santander Bank Polska S.A.“, which was adopted by the Management Board and approved by the Supervisory Board.

The risk management system comprises:

- Principles of risk measurement and management;
- Processes applied to identify, measure, estimate and monitor risks to which the Bank is exposed, including foreseeable future risks;
- Risk limits and rules of conduct to be followed if the limits are exceeded;
- A reporting system to ensure that the risk level is monitored;
- An organisational structure adjusted to the size and profile of the risk incurred.

As part of its risk management system, the Bank exercises oversight over the risk inherent in its subsidiaries as well as monitors the risk related to outsourcing of activities.

To ensure consistency of the risk management processes, Santander Bank Polska S.A. Group implements relevant written policies, standards and procedures and monitors compliance with such regulations. Santander Bank Polska S.A. subsidiaries are obligated to implement internal regulations reflecting the risk management principles across the Group.

For risks embedded in the Group's activity, numerous risk identification and assessment processes have been developed. Such processes are also used for determining the most favourable risk-reward and for setting and verifying risk mitigation limits. The Group applies as well as modifies and develops risk management methods and takes into consideration changes in the Group's risk profile, economic environment, regulatory requirements and best market practice.

The main risks in the Group's activity are directly related to the applied business model:

- **Credit risk including concentration risk** - the risk of loss stemming from the fact that the customer or the counterparty is unable or unwilling to meet their contractual obligations and that the held collateral is insufficient to pay the Bank's claims. It also comprises counterparty credit risk, i.e. exposure to credit risk associated with treasury transactions, arising from changes in market parameters (e.g. fluctuations in exchange rates and/or interest rates, variability of options) during the tenor of the transaction. Depending on their direction, such fluctuations may give rise to a loss and credit exposure. This definition also comprises concentration risk, i.e. the risk of default by a single entity, entities that are connected through capital or organisational ties or groups of entities, in respect of which probability of default depends on the shared circumstances.
- **Operational risk** - the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. This definition includes legal risk, but excludes strategic or reputational risk.
- **Market risk on the banking book** (because the currency risk in the banking book is transferred and managed in the trading book, it is understood primarily as the interest rate risk in the banking book) is the likelihood of suffering losses due to the impact of interest rate movements on the Bank's equity structure (income, expenses, assets, liabilities and other off-balance

sheet operations). It is the Group's financial and economic exposure to interest rate movements. Interest rate risk is a significant element of the banking activity, having a significant impact on the net interest margin and market value of equity.

- **Market risk on the trading book** - the risk of loss arising from adverse changes in interest rates, exchange rates, equity instrument prices or credit spread.
- **Credit spread risk** - the risk related to the sensitivity of the exposure value to interest rate changes resulting from changes in the credit spread (i.e. changes in the creditworthiness of the debtor) and not from changes in market interest rates.
- **Liquidity risk** - the risk arising from the need to ensure that the Group always has sufficient funds to cover unconditional and contingent liabilities towards customers and contractors at an economic price.
- **Model risk** - the risk of implementation and use of incorrectly built/defined models or parameters, incorrect application of models or failure to update them. The risk also covers inadequate control and monitoring of performance of the models applied by the Bank.
- **Reputational risk** - the risk arising from any negative perception of the Bank and other members of the Group to which the Bank belongs by customers, counterparties, shareholders/investors and local communities.
- **Compliance risk** - the risk of legal or regulatory sanctions, significant financial loss impacting the results or negative impact on reputation that the Bank may suffer due to its failure to comply with the law, internal regulations and market standards.
- **Business risk** - the risk of losses arising from unfavourable changes in the business environment and internal environment of the Bank that may have a direct or indirect impact on the generated business or result in the adoption of an inadequate business strategy, incorrect implementation of the strategy or failure to take relevant actions in response to changes in the market. Business risk incorporates strategic risk. Business risk incorporates strategic risk.
- **Capital risk** - the risk of failure to ensure an adequate level and structure of own funds relative to the size of business and exposure to risk and, consequently, the risk that own funds are insufficient to absorb unexpected losses taking into account the growth plans and extreme conditions.
- **Risk of excessive financial leverage** – where the leverage (LR) is understood as the relative size of an institution's assets, off-balance sheet obligations and contingent obligations to pay or to deliver or to provide collateral, including obligations arising from received funding, made commitments, derivative or repurchase agreements, but excluding obligations which can only be enforced during the liquidation of an institution, compared to that institution's own funds, the of excessive financial leverage results from the institution's vulnerability due to leverage or contingent leverage that may require unintended corrective measures to its business plan, including distressed selling of assets which might result in losses or in valuation adjustments to its remaining assets.
- **ESG risks** – the risk of negative impact of ESG factors (environmental, social and corporate governance) on the balance sheet of the Santander Bank Polska S.A. Group and its customers and counterparties. This is a cross-cutting risk that affects the bank's traditional financial and non-financial risks to varying degrees and through diverse transmission channels. The bank considers the impact of this risk on: credit, operational, reputational and market risks, and compliance and business risks.

Risk management structure and organisation

Governance (committees)

Supervisory Board is responsible for ongoing supervision of the risk management system. The Board approves the strategy, key risk management policies and risk appetite, and monitors the use of internal limits from the perspective of current business strategy and the macroeconomic environment. It conducts reviews of key risk areas, the identification of threats and the process of defining and monitoring remedial actions. The Supervisory Board also assesses the effectiveness of measures taken by the Management Board, including risk management.

Audit and Compliance Committee of the Supervisory Board supports the Board in fulfilling the supervisory duties. The Committee makes annual reviews of the Group's internal mechanisms for financial control, accepts reports of the independent audit unit and compliance unit. The Committee receives quarterly reports on the delivery of post-audit recommendations and based on those reports, it assesses the quality of actions taken. The Audit Committee assesses the effectiveness of internal control system and risk management system. Moreover, the Committee's tasks include the monitoring of financial audit, in particular the inspection carried out by the audit company, the control and monitoring of independence of the chartered auditor and audit company, informing the Supervisory Board about outcomes of the inspection and making the assessment of the chartered auditor's and the audit company's independence. Moreover,

the Committee's role is to develop the policy and procedure for selecting the audit company and to present to the Supervisory Board the recommendations on election, re-election and recalling of External Auditor and on the External Auditor's fee.

The Risk Committee supports the Supervisory Board in assessing the effectiveness of the internal control and risk management systems and measures adopted and planned to ensure an effective management of material risks. The Committee meets at least 4 times a year. The Chief Risk Officer, who is in charge of Risk Management Division, provides the Risk Committee with comprehensive and understandable information about risk, enabling its Members to understand the Bank's risk profile.

Management Board is responsible for effective risk management. In particular it. Specifically, it sets up an organisational structure tailored to the size and profile of the risks taken, to segregate responsibilities in order that risk assessment and control functions remain independent of operational functions, to introduce and update a risk management strategy and ensure an adequate information policy. It reviews financial results of the Group. The Management Board has established a number of committees directly responsible for the development of risk management methods and for monitoring of risk levels in specific areas.

The Management Board fulfils its risk management role through its three committees: Risk Management Committee, Risk Management Sub-Committee, and Risk Control Committee, where the Management Board members are supported by key risk management officers.

Risk Management Committee (RMC) makes the most material credit decisions (above pre-defined levels) and approves the annual Model Plan (incl. for risk assessment models). RMC is also an executive committee to which requests from lower level committees may be escalated.

Risk Control Committee responsible for reviewing and controlling the overall enterprise wide risk management profile of the Santander Bank Polska S.A. Group as well as the compliance with the Group's Risk Appetite and reporting those aspects to the Management Board. With a comprehensive reporting procedure in place, the Committee has a full and consistent picture of the Bank's current risk profile and is able to control risk against the risk appetite. The Committee also ensures that appropriate rules are established for all material risks identification, assessment, management, and reporting. RCC also supervises other committees responsible for the management of risks identified in the Bank's operations.

The Risk Control Committee supervises the activities of the below-listed committees operating in the risk management field:

Credit Risk Committee, which approves and supervises the risk management policy and risk measurement methodology as well as monitors credit risk of consolidated credit portfolio or in cases pertaining to more than one business segment.

Credit Policy Forum for Retail Portfolios, Credit Policy Forum for SME Portfolios and Credit Policy Forum for Business & Corporate portfolios, which approve and supervise the risk management policy and risk measurement methodology as well as monitor credit risk pertaining exclusively to the business segment to which the given committee is dedicated.

Credit Committee, which takes credit decisions on the basis of the assigned lending discretions.

Provisions Committee takes decisions on impairment charges in individual and collective approach, for credit exposures, as well as other financial instruments and assets and on legal risk provisions. Moreover, the Committee formulates the methodology, reviews the adequacy of parameters applied when setting the impairment in individual and collective approach for Santander Bank Polska S.A. Group.

Restructuring Committee, responsible for decisions regarding the non-performing portfolio, such as approving strategy towards large credit exposures, approving cause of loss analyses, and for monitoring the portfolio and effectiveness of the recovery processes.

Information Management Committee, which takes decisions regarding the scope of data and information management processes so as to ensure proper risk management and compliance with the regulatory requirements.

Operational Risk Management Committee (ORMCo), which sets the direction for strategic operational risk actions in Santander Bank Polska S.A. Group in the area of business continuity, information security and fraud prevention.

Suppliers Panel, which establishes standards and carries out monitoring regarding providers and services, incl. outsourcing; main forum for discussion on risk resulting from the cooperation with suppliers.

Model Risk Management Committee, which is responsible for model risk management as well as supervises the methodology of models used in Santander Bank Polska S.A. Group.

Market and Investment Risk Committee, which approves and supervises the risk management policy and risk measurement methodology as well as monitors market risk in the banking book, market risk in the trading book, structural risk for the balance sheet, liquidity risk and investment risk.

Assets and Liabilities Management Committee (ALCO), whose responsibilities include: oversight over banking book transactions of the Bank and the Group, management of liquidity and interest rate risk in the banking book, funding and managing the balance sheet (including the pricing policy and foreign currency structure).

Liquidity Forum, which monitors liquidity position of the Bank, with a special focus on the dynamics of deposit and credit volumes, the Bank's needs for financing and the general market situation.

Capital Committee, which is responsible for the management of capital, especially for the ICAAP process.

Disclosure Committee, which verifies if the financial information of Santander Bank Polska S.A. Group published by the Bank meets the legal and regulatory requirements.

Local Marketing and Monitoring Committee, which approves new products and services before commercialisation, taking into account reputation risk analysis.

Compliance Committee responsible for supporting the supervisory process for ensuring compliance of the bank's activities and compliance with the applicable regulations, the Committee is responsible for compliance issues that have a cross-cutting impact on business units and supporting areas. It discusses and consults on key compliance proposals.

AML Decision Committee (Anti-Money Laundering), which it sets the standards and direction for strategic actions aimed to prevent money laundering and terrorist financing in Santander Bank Polska S.A. Group and monitors ML/TF risk management objectives. The Committee is also a control body in charge of preventing money laundering and terrorist financing across the Group activities and an advisory body for the Management Board Member responsible for the implementation of obligations specified in the Act of 1 March 2018 on the prevention of money laundering and terrorist financing.

AML Operational Committee, which takes decisions related to the fulfilment of duties aimed to prevent money laundering and terrorist financing in the Bank, including those related to: establishment and maintenance of business relations with high risk customers, also PEP customers, and approval of internal procedures in this area

The most important committee responsible for managing sustainability and ESG issues at the Bank is the **ESG Committee**. Its mandate is to support the Bank's Board of Directors in fulfilling its management responsibilities with regard to the Bank's strategic sustainability activities. The Committee sets the strategic direction and establishes and monitors sustainability objectives for all areas of the Bank's business. This committee is chaired by the CEO.

To coordinate the day-to-day implementation of activities related to the development and implementation of ESG solutions, including responsible banking, sustainable development, organisational culture, sustainable financing, ESG risks and the climate agenda, the Committee has established a working group called the ESG Forum.

ESG Panel is a cross-department panel of experts supporting business segments of Santander Bank Polska S.A. Group in the proper identification and classification of transactions and products as compliant with EU Taxonomy, the Internal Sustainable Finance Classification System and with other Polish and European regulations in this area in order to prevent greenwashing risk.

The Bank has dedicated authorities which are convened in crisis situations:

- **Gold Committee** - is the ultimate management authority which takes decisions in crisis situations (with the consideration of the roles of the Management Board and the Supervisory Board), it recommends the Management Board to activate the Recovery Plan, activates liquidity and capital contingency plans, and activates business continuity plans and the communication plan (if not already implemented at an earlier stage of an event).
- **Silver Committee** - the main special situations governance body following the activation of the contingency situation, which assesses the impact of that situation and coordinates activities as part of the special situation management, activates action plans (e.g. business continuity plans) and BAU restoration procedures, and draws lessons learned after the special situation is resolved. It supports the Gold Committee.
- **Bronze Group** - is responsible for the identification of and prompt response to threats or events that may pose a risk to the normal functioning of the Bank and/or the Group. It identifies new threats in cooperation with the committees which manage risks on a regular basis. It supports the Silver Committee.

Organizational structure (units)

In terms of organizational structure, the risk management system relies on three independent and complementary levels (lines of defence):

- **1st line of defence** comprises risk management as part of the Bank's operations and is based on business units, which generate risk that affects the achievement of the Bank's targets. The first line of defence includes activities carried out by each employee and business unit in respect of quality and correctness of the tasks performed. The first line of defence receives assessments, information and analyses of risk exposures from the risk management unit and takes them into account in the risk management process, including decision-making processes. However, it is the management of business units within the first line of defence who is responsible for business decisions made, and eventually the Bank's Management Board in line with their authorities;
- **2nd line of defence** includes risk management by employees holding dedicated job positions or working in dedicated organisational units as well as the activity of compliance function. Risk management as part of the second line of defence is independent from risk management in the first line of defence. The second line of defence is formed by functions which support the Bank's management in risk identification and management by providing the relevant tools, internal regulations and mechanisms for managing, monitoring, ongoing verification, testing and reporting risk as well as specialist functions which assess the effectiveness of the first line controls. Units in the second line of defence are also responsible for performing activities within vertical monitoring, comprising ongoing verification and vertical testing.

The second line of defence units are organisationally separate from the activities they are to monitor and control as they operate within separate organisational structures, specifically:

- ✓ The Risk Management Division, whose units report directly to the Head of the Risk Management Division (Chief Risk Officer (CRO)), who is a Vice-president of the Bank's Management Board responsible for risk management. Risk Management Division's role is to provide assurance that the key risks are being identified and managed by the management, and that the Bank acts in line with internal risk policies. The units support the Bank's management in the process of identifying and managing risk by providing relevant tools for risk management, monitoring and reporting. Within the Division there has been established, among others, the Internal Control Model Function that coordinates preparation, implementation and ongoing updates to the Internal Control Model (ICM). ICM covers the whole activity of Santander Bank Polska S.A. Group;
 - ✓ The Compliance function reporting directly to the Management Board Member in charge of the Legal and Compliance Division. Compliance function's goal is to support Santander Bank Polska S.A. Group 's management in managing non-compliance risks to ensure that Santander Bank Polska S.A. Group complies with legislation, regulatory requirements and best practices recognising that the Compliance unit is particularly responsible for controls safeguarding compliance with legislation, internal regulations and market standards related to the type of business. The responsibility for ensuring compliance in specialist areas, such as, inter alia, prudential rules, taxation, company law, employment law and health and safety, is allocated to an appropriate specialist function;
 - ✓ Financial Accounting and Control function that supports the Bank's management through assuring correct and reliable reflection of the Bank and Group's standing in (internal and external) financial information;
 - ✓ Special functions responsible for independent risk management, including the Control Centre.
- **3rd line of defence** is formed by the Internal Audit Area, which provides independent and objective examination and assurance of the first and second tier controls as well as the assessment of the management system of the Bank and its subsidiaries, including the effectiveness of managing the risk related to the Bank's business and the business of its subsidiaries. Internal Audit Area reports directly to the President of the Management Board (CEO).

The three lines of defence model ensures that the risk management function is independent of the business units responsible for risk-taking. The three lines of defence provide the Management and Supervisory Boards with up-to-date and accurate information about the risk profile and management quality.

Risk reporting and measurement systems

Santander Bank Polska S.A. Group assesses and reports the risk on an ongoing basis. The foundation of the risk management and control is valid, reliable and detailed management information. It enables risk identification, assessment, management and reporting at the relevant level. The Bank has defined the official List of reports for the Bank Executives Management Information System which presents the key management reports, including those for the risk management area, along with specification of units responsible for their preparation, bodies/ units to which the reports are addressed (the Bank management and committees), as well as, frequency and overall contents of said reports. The principles have been defined based on the list of significant risks and expert recommendations made by owners of individual risks which were developed in the consideration of external requirements, the Bank's internal needs and best corporate practice.

Data used for reporting the risk level are taken from numerous IT systems of Santander Bank Polska S.A. Group and are subject to strict certification ensuring high quality and transparency of metrics regarding risk management, in accordance with the European standards formulated by the Basel Committee.

The central risk management report is the Unit Report/Monthly Risk Report which includes comprehensive information prepared monthly by the Risk Management Division. The report covers: macroeconomic environment review, utilisation of the risk appetite limits, review of the credit portfolio quality, balance of provisions, current metrics relating to market risk, liquidity risk, structural risk, conduct risk, operational risk, compliance risk and legal risk, model risk, strategic risk and capital adequacy risk. The report is presented to the Risk Control Committee (the Management Board level) and to the Risk Committee (operating at the Supervisory Board level).

In response to the presented information, the management of the second line of defence units, as well as, the Committees and the Management Board and the Supervisory Board take adequate decisions, in line with the powers in place, thus causing potential modification of the risk management strategy.

Stress tests

The Bank and the Santander Bank Polska S.A. Group apply stress tests in order to assure adequate risk management. The purpose of stress tests is to analyse the impact of stressed conditions on: risk appetite, capital plans, liquidity contingency plans, recovery and resolution plans, strategic and business planning. Stress tests are performed at the Bank and the Group based on assumptions that ensure accurate risk assessment or measurement. The frequency of stress tests depends on the risk or process but it must not be lower than once a year.

Risk prevention and mitigation strategy

The Bank protects itself against risk or mitigates risk by introducing suitable risk controls adjusted to the size and complexity of the Bank's business, in particular through:

- Defining and monitoring of **watch threshold and limits** adjusted to the Bank's size and risk profile. Watch thresholds and limits are adjusted to the Bank's risk appetite;
- **Establishment of organisational units in charge of risk management** and structuring them into independent three lines of defence;
- **Establishment of committees** taking risk management decisions in accordance with powers delegated to them by the Management Board;
- **Introduction of internal control system**, i.e. establishment of effective controls for risk-generating processes, formally described in the Internal Control Model. Each year, the Bank carries out the assessment of the construction and effectiveness of the control and the Bank's Management Board and an independent external auditor make the certification of the Internal Control Model. The certification outcomes are reported to the engaged Committee operating at the Supervisory Board level;
- **Risk culture promotion**, i.e. enhancing the staff awareness of risk management issues (Intranet articles, mailing, contests, etc.), obligatory inclusion of risk management objectives in the performance review and risk management training;
- **Risk transfer instruments** (security measures, insurance, guarantees) adequate for individual risk types.

Risk appetite

Risk management in the Bank and the Group is consistent with the risk profile which corresponds to the general risk appetite defined by the Group. Risk appetite is expressed as quantitative limits and captured in the Risk Appetite Statement approved by the Management Board and the Supervisory Board.

The formulation of the Risk Appetite Statement is based on certain foundations reflecting the Bank's and the Group's targets in terms of risk that are in line with the strategy and business plans. The Bank's and the Group's risk appetite is set below its risk capacity. Additionally limits are set using stress tests and scenario analyses to ensure the stability of the bank's position even if adverse circumstances materialise. Main risk appetite limits are used to set watch limits and shape risk management policies. Risk levels covered

by the limits are subject to regular monitoring and reporting monthly to relevant committees up to the level of Risk Committee at Supervisory Board. There are also appropriate escalation paths in place to convey information of the limits excess.

Details about managing different risk types, the structure of corporate governance and roles of selected units in risk management oversight are presented in Note 4 *Risk management* of the Consolidated Financial Statements of Santander Bank Polska S.A. Group for 2025.

2. Objectives and strategies for risk management – by risk category

Credit risk, Counterparty credit risk

Introduction

Credit risk is defined as the possibility of suffering a loss if the borrower fails to meet their credit obligation, including payment of interest and fees. It results in the impairment of credit assets and contingent liabilities as a consequence of the borrower's worsening credit quality. Credit risk measurement is based on the estimation of credit risk weighted assets, with the relevant risk weights representing both the probability of default and the potential loss in the event of the borrower's default.

Credit risk in the Bank and Group arises mainly from lending activities on the retail, corporate and interbank markets. This risk is managed as part of the policy approved by the Management Board on the basis of the adopted credit procedures and discretionary limits. The internal system of credit grading and monitoring used by the bank and allows for the early identification of potential defaults that might impair the loan book. Additionally the Bank and the Group use a large set of credit risk mitigation tools, both collateral (financial and nonfinancial) and specific contractual terms and clauses (covenants).

Credit risk management in the Bank and Group involves actions taken as a result of the ongoing analysis of the macroeconomic environment and internal reviews of particular credit portfolios. These advanced credit risk assessment tools allow quick remedial actions to be effected in response to the first signs of any change in the portfolio's quality or structure.

Risk management structure and organisation

The credit risk oversight in Santander Bank Polska S.A. Group is performed by Credit Risk Committee. Its key responsibilities include development and approval of the best sectoral practice, industry analyses, credit policies as well as implementation of grading and assessment systems aimed at ensuring sustainable growth of the credit portfolio. To align the Group's management processes with the current strategic goals, three sub-committees (Credit Policy Forums) were additionally established with a responsibility for the key customer segments: retail segment, SME segment and the business/corporate segment. The oversight over the credit risk models is the responsibility of the Model Risk Management Committee.

The Risk Management Division is responsible for a consolidated credit risk management process, including management and supervision of credit delivery, defining credit policies, providing decision-making tools and credit risk measurement tools, quality assurance of the credit portfolio and provision of reliable management information on the credit portfolio.

Risk identification, measurement and risk reporting

Credit risk management is based on existing credit policies. Credit policies refer to particular business segments, loan portfolios and banking products. They contain guidelines for the identification of the areas where specific types of risks manifest themselves, specifying the methods of their measurement and mitigation to the level acceptable to the Group (e.g. loan-to-value ratios, FX risk in the case of foreign currency loans).

The Group reviews and updates its credit policies on a regular basis, aiming to bring them in line with the Group's strategy, current macroeconomic situation, legal developments and changes in regulatory requirements.

The credit decision-making process being part of the risk management policy is based upon Individual Credit Discretions vested in credit officers, commensurate with their knowledge and experience within the business segments. Credit exposures in excess of PLN 50m are referred to the Credit Committee composed of senior management and top executives. Transactions above certain thresholds (ranging from PLN 85m to PLN 920m, depending on the type of transaction and the level of credit risk) are additionally approved by the Risk Management Committee functioning at Board level.

The Group continually strives to ensure best quality credit service while satisfying the borrowers' expectations and ensuring security of the credit portfolio. To this end, the credit risk approval function has been segregated from the sales function.

Intensive work has been undertaken to further develop credit risk assessment tools to conform to the recommendations of the Polish Financial Supervision Authority, requirements International Financial Reporting Standards and the best practice in the market.

The Group uses credit risk grading models for its key credit portfolios, including corporate customers, SMEs, home loans, property loan, cash loans, credit cards and personal overdrafts. The Group regularly monitors its credit grading using the rules specified in its Lending Manuals. Additionally, for selected models, an automated process of credit grade verification is carried out based on the number of overdue days or an analysis of the customer's behavioural data. Credit grade is also verified at subsequent credit assessments.

The Group performs regular reviews to determine the actual quality of the credit portfolio, confirm that adequate credit grading and provisioning processes are in place, verify compliance with the procedures and credit decisions and to objectively assess professionalism in credit management. The reviews are performed by the two specialised units: Non-Retail Process Control Office and Financial Crime Control and Prevention Department, which are independent of the risk-taking units.

Risk prevention and mitigation

In the Group's security model, the Collateral and Credit Agreements Centre is the central unit responsible for creation and maintenance of securities. The Security Manual as a procedure describing legal standards for the application of collateral security is managed by the Legal and Compliance Division. The role of the department is to ensure that security covers are duly established and held effective in line with the lending policy for all business segments. The unit is also responsible for developing standardised internal procedures with respect to perfecting and maintaining validity of collateral as well as ensuring that establishment, monitoring and release of security covers is duly effected. The department also manages the bank's real estate appraisal process.

Furthermore, the Collateral Centre provides assistance to credit units in credit decision making and development of credit policies with respect to collateral. The unit gathers data on collateral and ensures appropriate management information.

The tables below show types of collateral that can be used to secure loans and advances to customers from non-banking sector.

RETAIL CUSTOMERS

Type	Type of collateral
Cash loan	bills, guarantees, credit insurance
Credit on liquid assets	guaranty deposit, amounts frozen on account, investment funds
Student loan	sureties
Housing loan	mortgage, credit insurance, transfer of claim
Leasing	bills, guarantees, transfer of rights to bank's account; court registered pledge on movables; transfer of ownership, open mortgage, obligation of the leased asset supplier to buy the asset back (buy-back guarantee)

BUSINESS CUSTOMERS

Type	Type of collateral
Commercial credit	guaranty deposit, registered pledge, bills
Revolving credit	assignment of credit, bills, guarantees, registered pledge
Building credit	mortgage
Investment credit	mortgage, sureties, warranty
Granted and with supplements	guarantees, warranty
Leasing	bills, guarantees, transfer of rights to bank's account; court registered pledge on movables; transfer of ownership, open mortgage, obligation of the leased asset supplier to buy the asset back (buy-back guarantee)

Before a credit decision is approved, in the situations provided for in internal regulations, the Collateral and Credit Agreements Centre assesses the collateral quality and value, a process that includes:

- Verification of property valuations prepared by real estate appraisers and assessment of the value of the collateral for commercial loans;
- Assessment of the legal status of the collateral object for commercial loans;
- Evaluation of documentation related to the real estate investment process (applies to certain cases);
- Legal consultation on proposed collateral.

The Collateral and Credit Agreements Centre actively participates in credit processes, executing tasks including:

- Verification of the completeness of signed collateral documents received from the Registry and compliance with the Bank's internal procedures (verification done before or immediately after the launch);

- Recording and verification of data in information systems;
- Monitoring of collateral and evaluation of the correctness of the establishment of collateral;
- Reporting on the status of collateral in each segment;
- Releasing of the security.

In managing its receivables, the Group carries out the process of collateral liquidation. Selection of proper actions towards the liquidation of specific collateral depends on the type of the collateral (personal or tangible). In principle the Group aims at voluntary proceedings in the course of collateral liquidation. When there is no evidence of cooperation with a collateral provider, the Group's rights are exercised in compliance with the law and internal regulations in the bankruptcy and enforcement proceedings.

Counterparty credit risk

The exposure to counterparty risk in the scope of estimating the capital requirement is determined in accordance with the standardised approach for counterparty credit risk provided for under CRR.

Counterparty credit risk is managed using the adopted credit procedures and the system of treasury limits established in the respective credit decisions, including as a result of the counterparty credit assessment. The credit decision also determines how the limit allocated to the customer is to be secured. Limits are set taking into consideration potential exchange rate or interest rate fluctuations. The customer's exposure in respect of the allocated limit is monitored on a daily basis.

The Bank can additionally limit counterparty risk by obtaining additional collateral, i.e. on a margin call basis as stated in the master agreement signed with customer, or by signing CSAs (Credit Support Annex) with customers as they considerably limit transaction risk.

Such solutions hedge counterparties against exposure changes resulting from changes in the market value of instruments underlying derivative contracts, independent of the level of repayment capacity of the Bank or its counterparties.

In addition, counterparty credit risk is limited through posting the initial margin.

For entities with an appropriate contract type that allows for netting, a formula that takes netting into account is used when calculating counterparty risk exposures.

If the event of a customer's credit deterioration or the customer defaults on the transaction and a long-term claim arise, the Bank decides to create a credit reserve.

Market risk

Introduction

Market risk is defined as an adverse earnings impact of changes in interest rates, FX rates, share quotations, stock exchange indices, etc. It arises both in trading and banking activity (FX products, interest rate products, equity linked trackers).

Santander Bank Polska S.A. Group is exposed to market risk arising from its activity in money and capital markets and services provided to customers. Additionally, the Group undertakes the market risk related to the active management of balance sheet structure (assets and liabilities management).

The activity and strategies on market risk management are directly supervised by the Market and Investment Risk Committee and are pursued in accordance with the framework set out in the Market Risk Policy and the Structural Risk Policy approved by the Management Board and the Supervisory Board.

Risk management structure and organisation

The key objective of the market risk policy pursued by the Group is to reduce the impact of variable market factors on the Group's profitability and to grow income within the strictly defined risk limits while ensuring the Group's liquidity and market value.

The market risk policies of Santander Bank Polska S.A. Group establish a number of risk measurement and mitigation parameters in the form of limits and metrics. Risk limits are periodically reviewed to align them with the Group's strategy.

Interest rate and FX risks linked to the banking business are managed centrally by the Financial Management Division. The Division is also responsible for acquiring funding, managing liquidity and making transactions on behalf of ALCO Committee (Assets and Liabilities Management Committee). This activity is controlled by the measures and limits approved by the Market and Investment Risk Committee, the bank's Management Board and the Supervisory Board.

The debt securities and the interest rate and FX hedging portfolio is managed by ALCO Committee, which takes all decisions on the portfolio's value and structure.

The market risk on the trading portfolio is managed by the Corporate and Investment Banking Division, which is also responsible for the activities of Santander Brokerage Poland. The Group's trading activity is subject to a system of measures and limits, including Value at Risk, stop loss, position limits and sensitivity limits. These limits are approved by the Market and Investment Risk Committee, the bank's Management Board and the Supervisory Board.

The Banking Book Risk Office and Trading Book Risk Office within the Risk Management Division is responsible for ongoing risk measurement, implementation of control procedures and risk monitoring and reporting. The Offices are also responsible for shaping the risk policies, proposing risk measurement methodologies and ensuring consistency of the risk management process across the Group. Owing to the fact that the Banking Book Risk Office and Trading Book Risk Office are a part of the Risk Management Division, the risk measurement and monitoring processes are separate from the risk-taking units.

The market risk of equity instruments held by Santander Brokerage Poland (shares, index-linked securities) is managed by Santander Brokerage Poland itself and supervised by the Market and Investment Risk Committee of Santander Bank Polska S.A.

The bank's Market and Investment Risk Committee, chaired by the Management Board member in charge of the Risk Management Division, is responsible for independent control and monitoring of market risk in the banking and trading books.

Risk identification and measurement

The trading book of Santander Bank Polska S.A. Group contains securities and derivatives held by the Corporate and Investment Banking Division for trading purposes. The instruments are marked to market each day, and any changes in their value are reflected in the profit and loss. Market risk in the trading book includes interest rate risk, currency risk and repricing risk.

The interest rate risk in the Group's banking book is the risk of adverse impact of interest rate changes on the Group's income and the value of its assets and liabilities. Interest rate risk arises primarily on transactions entered in the bank's branches and in the business and corporate centres, as well as the transactions made in the wholesale market by the Financial Management Division. Additionally, interest rate risk can be generated by transactions concluded by other units, e.g. through acquisition of municipal/ commercial bonds or the bank's borrowings from other sources than the interbank market.

Santander Bank Polska S.A. Group uses several methods to measure its market risk exposure. The methods employed for the banking portfolio are the MVE and NII sensitivity measures, stress tests and Value at Risk (VaR), while the methods used for the trading portfolio include: VaR, stop loss, sensitivity measures (PV01) and stress tests. The risk measurement methodology is subject to an independent initial and periodic validation, the results of which are presented for approval to the Models and Methodology Panel (part of the Market and Investment Risk Committee).

At Santander Bank Polska S.A. Group, the VaR in the trading portfolio is determined using a historical method as a difference between the mark-to-market value of positions and the market values based on the most severe movements in market rates from a determined observation window. VaR is calculated separately for interest rate risk, FX risk and the two risks at the same time. VaR is also calculated for the repricing risk of the equity instruments portfolio of Santander Brokerage Poland.

Due to the limitations of the VaR methodology, the Group additionally performs sensitivity measurement (showing how position values change in reaction to price/profitability movements), Stressed VaR measurement and stress tests.

Risk reporting

The responsibility for reporting market risk rests with the Risk Management Division, specifically the Trading Book Risk Office.

Each day, the Trading Book Risk Office controls the market risk exposure of the trading book in accordance with the methodology laid down in the Market Risk Policy. It verifies the use of risk limits and reports risk levels to units responsible for risk management in the trading book, to Santander Group and to the Market and Investment Risk Committee.

Once a month, the Trading Book Risk Office provides information about the risk exposure of the trading book and selected measures to the Market and Investment Risk Committee and prepares the Risk Dashboard (in cooperation with other units of the Risk Management Division), which is presented to the Risk Management Committee.

The results of market risk measurement with regard to the banking book are reported by the Banking Book Risk Office to persons responsible for operational management of the bank's balance sheet structure and to persons in charge of structural risk management on a daily basis (information about the ALCO portfolio) or on a monthly basis (interest rate gap, NII and MVE sensitivity measures, stress test results, VaR). This information is also reported each month to the bank's senior executives (Market and Investment Risk Committee, ALCO). The selected key interest rate risk measures, including risk appetite measures defined for the Group's banking book, are reported to the bank's Management Board and Supervisory Board.

Risk prevention and mitigation

The Bank has adopted a conservative approach to risk-taking both in terms of the size of exposures and the types of products. A large portion of the Financial Market Area activity revolves around mitigating the risk related to customer transactions at the retail and corporate level. In addition, flows from customer transactions are generally for non-market amounts and tenors and thus risk capacity is required to manage these mismatches with wholesale transactions.

From the Bank's perspective, the market risk limits are small and are in place to allow sufficient capacity and time to neutralise interest rate and foreign exchange risks, while at the same time allowing the Financial Market Area to hold some of portfolio positions opened to add value to the organisation.

There is a greater emphasis placed on market making over pure mark to market trading and this is reflected in both limit utilisation and budgetary targets.

The combination of transactions made by the Financial Market Area and positions transferred from the Bank arising from customers' FX and derivative activity create the overall interest rate and currency risk profiles, which are managed under the policy and operational limits in place. The Financial Market Area subsequently decides either to close these positions or keep them open in line with market view and approved limits. The return earned is a mix of flow management and market making. However, there is no intention to keep aggressive trading positions.

The interest rate and currency risk of the Financial Market Area is managed via the trading book in accordance with the Market Risk Policy approved by the Management Board. Accounting and risk systems help to ensure allocation of each position into appropriate books. Relevant teams (desks) are responsible for individual types of market risk (interest rate risk and currency risk).

To ensure that the trading book positions are marketable, the Bank controls the gross value of the positions (separately long and short positions) versus the entire market. This is to check if it is technically possible to close an open position one way, without taking into account other closings. The control is performed by the Trading Book Risk Office separately for currency positions and interest rate positions. The control results are reported to the first line of defence.

As regards market risk in the Banking book, all positions that generate repricing risk are transferred for management to the Financial Management Division, responsible for shaping the Bank's balance sheet structure, including by entering into transactions in the interBank market so as to manage the interest rate risk profile according to the approved risk strategy and in compliance with the allocated risk limits.

The Bank's subsidiaries also mitigate their exposure to interest rate risk. If there is a mismatch between the repricing of assets and liabilities, the company enters into appropriate transactions via the standard Bank accounts held with the Bank or makes derivative transactions with the Bank, which from the transaction date manages the risk as part of the global limit of Santander Bank Polska S.A. Group.

The interest rate risk in the banking book is managed based on the following measures:

- NII sensitivity (the sensitivity of net interest income to a parallel shift of the yield curve by 100 bp);
- MVE sensitivity (the sensitivity of the market value of equity to a parallel shift of the yield curve by 100 bp);
- CSRBB – credit spread risk in banking book;
- VaR - Value-at-Risk;
- Basis risk;
- Gap risk;
- Stress scenarios (stress-tests, reverse stress-tests);

- Duration, BPV.

The Bank calculates all the above-mentioned measures at least monthly.

The basic scenario for calculating MVE sensitivity and NII sensitivity is a parallel shift of the yield curve by 100 basis points (bps). For both of these measures, on a monthly basis, the Bank conducts extended analyses addressing internal and regulatory demand.

The following are primarily used for MVE sensitivity:

- Parallel and non-parallel shocks described in the EBA Guidelines (EBA/RTS/2022/10) in relation to Tier 1 Capital;
- Parallel shocks of interest rate changes by +/-100 bps;
- Reverse stress tests, which indicate the size of the shock that will exceed the established threshold.

For NII sensitivity, the following are primarily used:

- Parallel shocks described in the EBA Guidelines (EBA/RTS/2022/10) in relation to Tier 1 Capital;
- Parallel interest rate shocks of +/-100 bps;
- Reverse stress tests, which indicate the size of the shock that will exceed the established threshold.

The table below presents the sensitivity of net interest income (NII) and economic value of equity (MVE) to a parallel shift in the yield curves by 100 bps as of the end 2025 and in the comparative period. It presents the results of scenarios in which the impact of interest rate changes on net interest income and economic value of capital would be negative, data in PLN k.

1 day holding period (PLN thousands)	NII sensitivity		MVE sensitivity	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024
Santander Bank Polska	-258 347	-313 223	-1 070 404	-963 007
Grupa Santander Bank Polska	-273 675	-375 990	-1 075 075	-1 142 856

The table above presents data for the Bank and the Santander Group. In the 2025 data, the Group's scope includes Santander Bank Polska S.A., Santander Leasing S.A. and Santander Factoring Sp. z o.o., while in the comparative year it was expanded to include Santander Consumer Bank S.A.

Exposure levels for interest income sensitivity decreased in 2025. The sensitivity of the economic value of equity increased both individually and for the Group, taking into account the same scope (excluding Santander Consumer Bank S.A.). The decrease in MVE sensitivity for the Group, visible in the table above, results from the exclusion of SCB from the measurement in 2025. The main reason for these changes was the implementation of a strategy for hedging interest income sensitivity, which increased the duration of the assets side of the balance sheet. This hedging strategy was primarily based on entering into cash flow hedge transactions under hedge accounting and expanding the ALCO portfolio, primarily with fixed-coupon debt securities.

In order to hedging the interest rate risk on the banking book, the Bank conducts an annual limit planning process. The limit structure distinguishes limits within the risk appetite statement (RAS) and operational limits. RAS limits are approved by the Management Board and the Supervisory Board, while operational limits are approved by the Market and Investment Risk Committee. For the most important measures, i.e. MVE sensitivity and NII sensitivity, the limit structure includes both operational limits and RAS. The interest rate risk management strategy in the banking book is approved by the Asset and Liability Management Committee (ALCO), mainly within the mandates for the first line of defence. The main instruments of rate risk management are:

- Balance sheet management to ensure structural exposure is aligned with expected risk appetite;
- Interest rate swaps. They are used for both hedge accounting and economic hedging;
- ALM bond portfolio management.

As part of the 2025 operating limit grid, the SOT NII measure has been added and the limits for interest income sensitivity have been reduced.

K_68.00 - EU IRRBB1 - INTEREST RATE RISKS OF NON-TRADING BOOK ACTIVITIES
AS AT 31 DECEMBER 2025 AND IN THE COMPARATIVE PERIOD, (PLN K)

Supervisory shock scenarios	Changes of the economic value of equity		Changes of the net interest income (NII)	
	31.12.2025	30.06.2025	31.12.2025	30.06.2025
1 Parallel up	-2 726 362	-3 165 558	239 048	348 144
2 Parallel down	463 760	627 367	-988 451	-1 005 628
3 Steepener	616 011	470 263		
4 Flattener	-2 055 039	-1 735 138		
5 Short rates up	-2 734 806	-2 631 740		
6 Short rates down	1 162 511	1 072 091		

The sensitivities included in the table above were determined for the Santander Bank Polska S.A. Group, which, in the June data, consisted of Santander Bank Polska S.A., Santander Leasing S.A. and Santander Factoring Sp. z o.o., and Santander Consumer Bank S.A., while the year-end data did not include Santander Consumer Bank S.A.

The decrease in MVE and NII sensitivity for the worst-case scenarios, as seen in the EU IRRBB1 table, results primarily from ignoring the sensitivities generated by Santander Consumer Bank S.A. at year-end. Considering the same range of entities (excluding Santander Consumer Bank S.A.) for the dates indicated in the table, an increase in sensitivity for the worst-case MVE and NII sensitivity would have been observed. The increase in the sensitivity of the economic value of equity resulted from investments in fixed-coupon debt securities. Meanwhile, the increase in the sensitivity of net interest income was caused by greater involvement in transactions with short revaluation periods at the end of the year and a greater impact of automatic optionality in the form of maximum interest rates on loans and lower limits on interest rates on deposits, as a result of interest rate cuts.

IRRBB sensitivity measures subject to regulatory limits were as follows: on a standalone basis, SOT NII was 3.98% and SOT MVE was 11.55%, while on a consolidated basis, SOT NII was 3.82% and SOT MVE was 10.57%. In both cases, the measures are below the regulatory thresholds of 5% and 15% of Tier 1 capital, respectively.

In the period since the previous Pillar III disclosures, there have been no significant changes to the modelling assumptions or parameters used.

Most of the key modelling assumptions and parameters used for the purposes of the disclosures included in the EU IRRBB1 table (under Annex XXXVIII - Instructions for interest rate risk on positions not held in the trading book disclosure templates) are consistent with the Bank's assumptions adopted for the internal measurement of interest rate risk in the banking book. For the internal purposes of calculating the total MVE sensitivity and NII sensitivity, the Bank uses an internal aggregation model of position sensitivity in different currencies, which takes into account correlations between currencies and their historical volatilities. It is also worth noting that in the measurement for internal purposes, the Bank does not apply a lower bound (floor) to the curves used.

In measuring IRRBB, behavioral models used for both internal and regulatory purposes play an important role. The greatest impact on risk measures are:

- The prepayment model for loans, which distinguishes cash loans (divided into fixed and variable interest rates), mortgage loans (divided into fixed-variable and variable interest rates) and for the SME and BCB segments;
- The model of term deposit terminations (divided into retail and wholesale customers);
- The model for deposits without a maturity date, within which a sub-model operates that takes into account the relationship between market interest rates and the amortization profile of the deposit balance.

The models are subject to regular monitoring to assess their correctness and adjustment to the changing regulatory and legal environment and the changing market and internal situation of the Bank.

AVERAGE AND LONGEST REPRICING PERIOD FOR DEPOSITS WITHOUT A MATURITY DATE AS AT 31 DECEMBER 2025

Product	Average period (in years)	Maximum period (in years)
Retail current accounts	4,29	10
Retail saving accounts	0,09	10
Wholesale current accounts	1,01	10
Wholesale saving accounts	0,01	10

VaR and EaR in the banking portfolio are calculated separately. The key methods of measurement of the interest rate risk in the trading book include the VaR methodology, stop loss, PV01 sensitivity measurement and stress tests.

The VaR is calculated for open positions in the Trading Book using the historical simulations method. Under this method the Group estimates the value of portfolio for 520 scenarios generated on the basis of historically observable daily changes in market parameters. VaR is estimated as the 99th percentile of the lowest valuations P&L vector based on the change in the valuation of all trading portfolio in a given historical scenario.

The stop-loss mechanism is used to manage the risk of loss on trading positions subject to fair value measurement through profit or loss.

Stress tests are used in addition to these measures by providing an estimate of the potential losses in the event of materialisation of the stressed conditions in the market. The results of stress scenarios are based on sensitivity reports and on a given stress test scenario. Scenarios are based on historical periods of extreme market rate movements and on scenarios derived using expert judgement to account for additional potential changes in risk factors.

RISK MEASURES AT THE END OF 2025 AND 2024 FOR 1-DAY POSITION HOLDING PERIOD (PLN K)

Interest rate risk	VaR	
	31.12.2025	31.12.2024
1 day holding period		
Average	4 300	8 203
Maximum	12 576	12 892
Minimum	1 781	3 913
as of the end of period	4 240	3 913
Limit	15 343	16 036

The values presented refer to the VaR of the trading book. The observed values of the VaR in 2025 were lower than in 2024 reflecting lower volatility and stabilization in the interest rate market. In terms of the maximum observable level of interest rate VaR, it was lower than in the previous year. Approved for 2025 VaR-like limit levels were, in average, larger by several percent than those in effect in 2024 for values expressed in USD, but the decline in the dollar-zloty exchange rate during the year resulted in a decrease in the PLN limits. Based on that, average VaR position held across the year remains in line with expected risk exposure for 2025.

FX risk is the risk that adverse movements in foreign exchange rates will have an impact on performance (and result in losses). This risk is managed on the basis of the VaR limit for the open currency positions in the Group's trading portfolio and the portfolio of Santander Brokerage Poland which manages open positions linked to the market maker activity. Stress tests are used in addition to this measure by providing an estimate of the potential losses in the event of materialisation of the stressed conditions in the market. Stress tests use the currency exposure and the scenarios of extreme movements in currency rates based on historical data. Furthermore, the stop-loss mechanism is used for managing the risk of losses on trading positions.

In 2025, the Group's policy changed, allowing for the maintenance of open positions in currency and interest rate options on trading book portfolios. This change resulted in the introduction of a new VAR Vega metric, which is calculated daily and includes the VAR value for open options positions. The VaR Vega limit for 2025 was set at PLN 180,000k.

Open FX positions of subsidiaries are negligible and are not included in the daily VaR estimation.

RISK MEASURES AT THE END OF DECEMBER 2025 AND 2024 (PLN K)

FX risk	VaR	
	31.12.2025	31.12.2024
1 day holding period		
Average	465	679
Maximum	1 838	1 742
Minimum	67	234
as of the end of period	501	356
Limit	3 241	3 691

The values presented refer to the VaR of the trading book. In 2025, there were no VaR-type limit exceedances, which confirms the adequacy of VaR-type limit levels set, remaining in line with Bank's business activity and related to its exposure to market risk. The absence of exceedances suggests that the limit level was properly calibrated to the actual risk profile of the portfolio, as even with the observed market movements, losses did not reach the values predicted by the VaR model.

In regards to the structural exposure to currency risk in the Group's balance sheet, in 2025 the share of foreign currency assets in the balance sheet decreased. This was due to a smaller increase in the balance of assets in foreign currencies compared to the increase in total assets, with further gradual decrease of CHF loans, as a result of the continuing amortisation of the CHF mortgage portfolio.

The liquidity gap in individual currencies was closed with the use of swap transactions on the currency market.

GROUP'S KEY FX POSITIONS AS AT 31 DECEMBER 2025 AND IN THE COMPARABLE PERIOD (PLN K)

31.12.2025	PLN	EUR	CHF	USD	Other	Total
ASSETS						
Cash and operations with central banks	21 436 892	4 285 141	49 451	2 996 591	1 736 664	30 504 739
Receivables from banks	323 480	2 048 158	0	10	0	2 371 648
Receivables from customers	135 015 699	26 045 829	7 007	1 686 849	82 340	162 837 724
Financial assets	71 686 090	7 230 214	0	454 607	0	79 370 911
Selected assets	228 462 161	39 609 342	56 458	5 138 057	1 819 004	275 085 022
LIABILITIES						
Liabilities to banks	1 288 465	1 344 062	32 608	181 072	1 073	2 847 280
Liabilities to customers	185 514 101	32 722 604	1 078 688	8 992 387	1 834 784	230 142 564
Subordinated liabilities	1 014 851	587 114	0	0	0	1 601 965
Selected liabilities	187 817 417	34 653 780	1 111 296	9 173 459	1 835 857	234 591 809
31.12.2024 converted data						
	PLN	EUR	CHF	USD	Pozostate	Razem
ASSETS						
Cash and operations with central banks	16 960 183	5 565 737	48 542	4 827 492	1 601 552	29 003 506
Receivables from banks	155 307	3 875 858	0	0	0	4 031 165
Receivables from customers	147 298 313	25 094 119	394 980	1 833 642	155 227	174 776 281
Financial assets	65 943 117	4 456 849	0	517 065	0	70 917 031
Selected assets	230 356 920	38 992 563	443 522	7 178 199	1 756 779	278 727 983
LIABILITIES						
Liabilities to banks	2 453 600	2 473 078	557	219 742	1 683	5 148 660
Liabilities to customers	189 591 445	30 566 962	965 744	9 168 360	1 736 251	232 028 762
Subordinated liabilities	1 118 875	1 110 023	0	0	0	2 228 898
Selected liabilities	193 163 920	34 150 063	966 301	9 388 102	1 737 934	239 406 320

The data as at 31 December 2024 includes information on Santander Consumer Bank S.A. and its subsidiaries, while the restatement of data for this period results from a change in the scope of the item "Cash and cash equivalents".

The risk attached to the prices of equity instruments listed in active markets is managed by Santander Brokerage Poland which operates within the Corporate and Investment Banking Division. This risk is generated by own trades of Santander Brokerage Poland concluded in regulated markets (spot market instruments and futures).

It is measured using a Value at Risk model based on the historical analysis method.

The market risk management process at the Brokerage is overseen by the Market and Investment Risk Committee of Santander Bank Polska. The Committee sets the VaR limit for Santander Brokerage Poland, approves changes in the risk measurement methodology and oversees the risk management process.

RISK MEASURES IN 2025 AND 2024 (PLN K)

Equity risk 1 day holding period	VaR	
	31.12.2025	31.12.2024
Average	1 717	761
Maximum	2 301	2 059
Minimum	1 070	439
as of the end of period	2 002	2 059
Limit	2 881	1 638

The values presented refer to the VaR of the trading book. In 2025, there was no excess of the VAR limit for the BH equity risk.

Liquidity risk

Introduction

Liquidity risk is the risk that the bank fails to meet its contingent and non-contingent obligations towards customers and counterparties as a result of a mismatch of financial cash flows.

The activity and strategies on liquidity risk management are directly supervised by the Market and Investment Risk Committee and are pursued in accordance with the framework set out in the Liquidity Risk Policy approved by the Management Board and the Supervisory Board.

Risk management structure and organisation

The objective of the Liquidity Risk Policy of Santander Bank Polska S.A. Group is to:

- Ensure the ability to finance assets and satisfy claims, both current and future, in a timely manner and at an economic price;
- Manage the maturity mismatch between assets and liabilities, including the intraday mismatch of cash flows;
- Set a level of the liquidity risk in the form of various internal limits;
- Ensure proper organisation of the liquidity management process within the whole Santander Bank Polska S.A. Group ;
- Prepare the organisation for emergence of adverse factors, either external or internal;
- Ensure compliance with regulatory requirements, both qualitative and quantitative.

The general principle adopted by Santander Bank Polska S.A. Group in its liquidity management process is that all expected outflows occurring within one month in respect of deposits, current account balances, loan drawdowns, guarantee payments and transaction settlements should be at least fully covered by the anticipated inflows or available High Quality Liquid Assets (HQLA, liquidity buffer) assuming normal or predictable conditions for the Group's operations. As of December 2025, 31st the value of liquidity buffer was PLN 102.0 bn, and consists of: extremely liquid securities (mainly Treasury Bonds or bonds fully guaranteed by Central Government of Poland and Treasury Bonds issued by governments of Germany, Spain, France, United States, UK and bonds issued by European Investment Bank) in total 92.0%, central bank assets (including NBP bills) 5.9%, cash 1.5%, surplus in current accounts of National Bank of Poland (NBP) over the amount of mandatory reserve 0.6%. All components of liquid buffer are recognized as level 1 of liquid assets.

The purpose of this policy is also to ensure an adequate structure of funding in relation to the growing scale of the Group's business by maintaining structural liquidity ratios at pre-defined levels.

The Group uses a suite of additional watch limits and thresholds with respect to the following:

- Loan-to-deposit ratio;
- Ratios of reliance on wholesale funding, which are used to assess the concentration of foreign currency funding from the wholesale market;
- Concentration of deposit funding;
- Encumbrance assets ratio;
- Ratios laid down in CRR – LCR and NSFR;
- Survival horizon under stressed conditions;

- The HQLA buffer;
- The buffer of assets which might be liquidated over an intraday horizon.

The internal liquidity risk limits, including the limits established in the Risk Appetite Statement, are set on the basis of both historical values of the selected liquidity risk ratios as well as their future values which are estimated against a financial plan. The limits also take into account the results of stress tests.

At least once a year, Santander Bank Polska S.A. Group carries out the Internal Liquidity Adequacy Assessment Process (ILAAP), which is designed to ensure that the Group can effectively control and manage liquidity risk. In particular, the ILAAP ensures that the Group:

- Maintains sufficient capacity to meet its obligations as they fall due;
- Reviews the key liquidity risk drivers and ensures that stress testing reflects these drivers and that they are appropriately controlled;
- Provides a record of both the liquidity risk management and governance processes;
- Carries out assessment of counterbalancing capacity.

The ILAAP results are subject to approval by the Management Board and the Supervisory Board to confirm adequacy of the liquidity level of Santander Bank Polska S.A. Group in terms of liquid assets, prudent funding profile and the Group's liquidity risk management and control mechanisms.

The Asset and Liability Management Department (DZAP), located within the Bank's structures, takes actions to optimize the financing of Santander Bank Polska S.A. Group, in particular in the case of entities 100% dependent on the Bank. The aforementioned activities are aimed at optimizing the structure and cost of financing the Group, while ensuring an appropriate level of security and stability of financing sources. DZAP, as the owner of the Bank's Liquidity Emergency Plan, also takes care of the synchronization of activities and the flow of information within the Group in the event of a liquidity crisis.

Risk identification and measurement

The responsibility for identification and measurement of liquidity risk rests with the Risk Management Division, specifically the Banking Book Risk Office.

The role of the Department is to draft liquidity risk management policies, carry out stress tests and to measure and report on risk on an ongoing basis.

Liquidity risk is measured by means of the modified liquidity gap, which is designed separately for the PLN and currency positions. The reported future contractual cash flows are subject to modifications based on: statistical analyses of the deposit and credit base behaviour and assessment of product/ market liquidity – in the context of evaluation of the possibility to liquidate Treasury securities by selling or pledging them in repo transactions or using liquidity support instruments with NBP, as well as the possibility of transaction rolling in the interbank market.

When measuring liquidity risk, the bank additionally analyses the degree of liquidity outflows arising from potential margin calls due to changes in the value of derivative transactions and collateral needs related to secured financing transactions resulting from the downgrade of the bank's credit rating, among other things.

Concurrently, liquidity risk is measured in accordance with the requirements laid down in the CRD/CRR package and in their implementing provisions.

In order to establish a detailed risk profile, the Group conducts stress tests using the following 9 scenarios:

- a) Standard scenarios with imposed operating limits and included in the liquidity risk appetite:
 - Baseline scenario, which assumes non-renewability of wholesale funding;
 - Idiosyncratic liquidity crisis scenarios (specific to the bank);
 - Local systemic liquidity crisis scenario;
 - Global systemic liquidity crisis scenario;
 - Combined scenarios (combination of idiosyncratic and local crisis scenarios - with an operational limit not included in the risk appetite and as a separate combined scenario of idiosyncratic crisis and global systemic crisis);
- b) Supporting / ad hoc scenarios without imposed limits:

- Deposit outflows in a one-month horizon;
- Scenario for an accelerated outflow of deposits that can be terminated via electronic access channels;
- ESG liquidity scenario.

For each of the above scenarios, the Group estimates the minimum survival horizon. The survival horizon, assessed through the prism of risk appetite, as at December 31, 2025 was 260 days.

In addition, the bank performs stress tests for intraday liquidity risk as well as reverse stress tests.

Risk reporting

The responsibility for reporting liquidity risk rests with the Risk Management Division, specifically the Banking Book Risk Office.

The results of liquidity risk measurement are reported by the Banking Book Risk Office on a daily basis to persons in charge of operational management of the bank's liquidity and to persons responsible for liquidity risk management (information about intraday and current liquidity risk, including FX funding ratios and LCR) and – on a monthly basis – to senior executives (other liquidity risk ratios, including regulatory ratios).

Risk prevention and mitigation

The responsibility for supervision over the liquidity risk management process rests with the Assets and Liabilities Committee (ALCO), which also provides advice to the Management Board. ALCO prepares management strategies and recommends to the Management Board appropriate actions with regard to strategic liquidity management, including strategies of funding the bank's activity. Day-to-day management of liquidity is delegated to the Financial Management Division. The Assets and Liabilities Management Department, which is a part of the Division, is responsible for developing and updating the relevant liquidity management strategies.

The bank has a liquidity contingency plan approved by the Management Board and Supervisory Board to cater for unexpected liquidity problems, whether caused by external or internal factors. The plan, accompanied by stress tests, includes different types of scenarios and enables the bank to take adequate and effective actions in response to unexpected external or internal liquidity pressure through:

- Identification of threats to the bank's liquidity on the basis of a set of early warning ratios which are subject to ongoing monitoring, including intraday liquidity risk ratios;
- Effective management of liquidity/ funding, using a set of possible remedial actions and the management structure adjusted to the stressed conditions;
- Communication with customers, key market counterparties, shareholders and regulators.

In 2025, the Santander Bank Polska S.A. Group focused on the maintenance adequate level of liquidity buffer and effective allocation of the liquidity. With falling market interest rates in PLN and of the persistent liquidity surplus on the market we observed moderate competition for customer deposits in the banking sector. At the end of December 2025, the loan-to-deposit ratio was 68%, compared to 71% at the end of December 2024, while the liquidity coverage ratio on a consolidated basis was 2020%, compared to 216% in the previous year. The Bank also took care of the proper diversification of financing sources by limiting the funds obtained from the wholesale market and from the strategic investor. The wholesale market financing concentration ratio (financing concentration ratios from the wholesale market are calculated as the ratio of financing obtained in the form of issues or from financial and non-financial customers not classified as retail customers to total financing) for the Bank as at 31 December 2025 amounted to 36.6% compared to 33.7% at the end of 2024, while the financing ratio from the strategic investor was 0% and it hasn't changed over the year .

In 2025 and in the comparable period, all key regulatory ratios as well as liquidity risk measures identified as part of the risk appetite applicable to the Bank and Group were maintained at the levels required by regulations or approved by the Bank's Supervisory Board.

CUMULATED LIQUIDITY GAP ON AN CONSOLIDATED LEVEL AS AT 31 DECEMBER 2025 AND IN THE COMPARATIVE PERIOD.
NOMINAL VALUES ARE PRESENTED (PLN K)

31.12.2025	A'vista	up to 1 month	from 1 to 3 months	from 3 to 6 months	from 6 to 12 months	from 1 to 2 years	from 2 to 5 years	above 5 years	TOTAL
Assets	32 797 580	22 413 915	18 628 737	9 979 523	21 679 032	34 634 506	69 224 603	76 093 025	285 450 921
including:	0	0	0	0	0	0	0	0	0
- Sell-buy-back transactions	15 219 424	15 134 994	0	0	0	0	0	0	30 354 418
- Deposits from banks	0	0	5 000	10 000	100 000	2 189 420	0	0	2 304 420
- Deposits from customers	17 032 280	5 521 523	9 301 098	8 096 031	11 786 392	19 671 792	33 922 223	57 119 990	162 451 327
- Deposits from customers	0	507 294	2 990 907	1 385 611	7 735 969	12 773 295	33 979 556	18 973 035	78 345 667
Liabilities and equity	166 139 486	40 890 566	26 053 958	3 587 514	3 622 808	5 922 094	1 633 910	3 472 504	251 322 841
including:	0	0	0	0	0	0	0	0	0
- Sell-buy-back transactions	0	2 579 714	0	0	0	0	0	0	2 579 714
- Deposits from banks	1 583 623	271 491	454 492	78 923	160 375	136 438	130 000	0	2 815 341
- Deposits from customers	164 555 864	34 264 360	25 019 467	3 433 341	1 743 594	319 407	503 910	130 705	229 970 648
- Debt securities in issue	0	3 775 000	580 000	0	1 800 000	4 900 000	0	3 341 799	14 396 799
- Subordinated liabilities	0	0	0	0	0	579 481	1 000 000	0	1 579 481
Contractual liquidity gap	-133 341 907	-18 476 650	-7 425 221	6 392 008	18 056 224	28 712 412	67 590 693	72 620 521	34 128 079
Cummulated contractual liquidity gap	-133 341 907	-15 181 857	-159 243 779	-152 851 770	-134 795 546	-106 083 134	-38 492 442	34 128 079	0
Off Balance positions Total	57 927 473	8 451 651	1 088 123	267 323	667 937	641 242	380 924	1 166 057	70 590 730
-guarantees & letters of credits	16 686 917	0	0	0	0	0	0	0	16 686 917
31.12.2024	A'vista	up to 1 month	from 1 to 3 months	from 3 to 6 months	from 6 to 12 months	from 1 to 2 years	from 2 to 5 years	above 5 years	TOTAL
Assets	30 472 121	24 809 518	18 000 451	15 931 558	23 836 286	31 931 701	67 395 754	69 108 307	281 485 696
including:	0	0	0	0	0	0	0	0	0
- Cash and their equivalents	11 558 138	17 331 392	0	0	0	0	0	0	28 889 530
- Deposits from banks	789 049	34 651	1 709 200	1 281 900	0	0	0	290 000	4 104 800
- Deposits from customers	18 124 932	7 013 126	10 833 113	10 323 920	13 585 426	21 458 086	38 002 003	54 650 305	173 990 911
- Investment securities	0	119 928	2 504 989	3 095 378	10 250 859	10 473 616	29 393 751	14 168 002	70 006 524
Liabilities and equity	159 022 784	36 776 683	31 370 417	8 097 268	7 201 452	4 287 173	4 985 931	110 757	251 852 466
including:	0	0	0	0	0	0	0	0	0
- Sell-buy-back transactions	0	1 198 068	0	0	0	0	0	0	1 198 068
- Deposits from banks	2 101 134	423 790	1 466 046	235 342	248 328	348 350	416 438	0	5 239 427
- Deposits from customers	156 921 651	34 953 553	29 441 940	6 778 802	2 766 088	343 276	216 599	12 285	231 434 194
- Debt securities in issue	0	200 000	459 933	1 079 332	4 179 391	3 068 637	2 653 794	98 472	11 739 559
- Subordinated liabilities	0	0	0	0	0	512 760	1 685 828	0	2 198 588
- Lease liabilities	0	1 493	36 222	37 749	75 542	59 096	182 749	0	392 853
Contractual liquidity gap	-128 550 664	-11 967 165	-13 369 966	7 834 290	16 634 833	27 644 528	62 409 823	68 997 551	29 633 230
Cummulated contractual liquidity gap	-128 550 664	-140 517 828	-153 887 794	-146 053 504	-129 418 671	-101 774 143	-39 364 320	29 633 230	0
Off Balance positions Total	59 628 874	6 285 776	934 587	587 866	761 252	371 504	633 572	23	69 203 453
-guarantees & letters of credits	21 341 713	0	0	0	0	0	0	0	21 341 713

The data as at 31 December 2024 has been restated as a result of a change in the presentation of the item 'Cash and cash equivalents', details of which are described in note 2.5. *Comparability with the results of previous periods* Consolidated financial statements of the Santander Bank Polska S.A. Capital Group for 2025.

Details about the Risk Management are presented in Note 4 *Risk management* to the Consolidated Financial Statements of Santander Bank Polska S.A. Group for 2025.

Operational risk

Introduction

Santander Bank Polska S.A. Group adopted the operational risk definition of the Basel Committee on Banking Supervision, which says that **operational risk** is the risk of a loss resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk contains also legal risk but does not contain strategic risk or reputational risk.

The objective of the **operational risk management** is to minimize the likelihood and/or reduce the impact of unexpected and adverse events.

Risk management structure and organisation

Santander Bank Polska S.A. Group has implemented an integrated risk management framework to ensure that all risks which have a significant impact on Santander Bank Polska S.A. Group business are identified, measured, monitored and controlled. Operational risk management in Santander Bank Polska S.A. Group involves employees at all levels of the organization and consists of a number of interrelated components. Operational risk is inherent in all the Group's business processes, including the outsourced functions or services delivered in cooperation with third parties.

Santander Bank Polska S.A. Group has defined the **Operational Risk Management Strategy**. In addition, detailed politics, procedures and guidelines are used to define how risks are identified, estimated, monitored and mitigated.

The Operational Risk Management Committee (ORMCo) established by the Management Board is responsible for setting operational risk management standards for Santander Bank Polska S.A. Group . ORMCo is the main forum for discussions on operational risk. It sets out the strategic direction for operational risk management, determines and monitors objectives for managing operational risk, including business continuity, information security, outsourcing / insourcing and crime preventing.

Taking into consideration growing importance of cyber threats in the world, bank has a DREAM (Digital Risk Express Active Meetings), which is the function responsible for, among others, reporting and monitoring technological and operational risks, escalating important aspects related to IT risk; review of IT strategy, Cybersecurity and Operations, review of the most important IT, Cyber and Operations projects. DREAM takes steps to make decisions quickly and effectively to mitigate identified risks.

Awareness of employees and customers plays a key role in combating cyber threats. This is why bank has a CyberEducation Forum, whose role is to provide opinions and coordinate the implementation of all initiatives promoting a culture of cybersecurity among the bank's clients and employees. The forum is responsible for holistic shaping of the bank's image as a safe institution and consistent promotion of cyber principles.

Risk identification and measurement

The basic tool to identify and assess operational risk is self-assessment. In the self-assessment process, Santander Bank Polska S.A. Group identifies the risks it may be exposed to when delivering its functions, assesses inherent and residual risks in terms of their likelihood and impact, and evaluates the construction and the control environment functioning.

In the process of risk self-assessment the specialised risks are assessed, such as technology risk, vendors risk, cyber risk, fraud risk, compliance risk, model risk and risk of AML, corruption and bribery, data management and ESG.

Additionally, the operational risk identification and assessment process is supported by other tools, e.g. scenario analysis, business impact analysis (BIA), risk analysis in new initiatives.

Risk reporting

Each organizational unit is required to report operational events identified in its area of activity. A quick communication path to higher management is prepared for key operational events. The Group runs a database of operational events identified across the whole organization. The collected data is used to analyse the root causes and consequences of the events, define lessons to be learned and take preventive and corrective measures.

OPERATIONAL INCIDENTS IN SANTANDER BANK POLSKA S.A. GROUP IN 2025 GROSS LOSSES (PLN K)

Event types	Operational event class		PLN k	%
		Event category		
1. Internal fraud	1.1. Unauthorised activity		407	0,0%
	1.2. Theft and fraud		3 915	0,2%
2. External fraud	2.1. Theft and fraud		14 020	0,8%
	2.2. Security of systems		5 581	0,3%
3. Occupational safety and health, employment practices	3.1. Labour relations		358	0,0%
	3.2. Safety and health in the workplace		0	0,0%
	3.3. Discriminations		0	0,0%
4. Customers, products and operating practices	4.1. Adaptation, disclosure of information and trust		17	0,0%
	4.2. Inappropriate business or market practices		-2 006	-0,1%
	4.3. Defective products		1 723 898	96,9%
	4.4. Selection, Sponsorship and Risks		-774	0,0%
	4.5. Consulting services		0	0,0%
5. Damage to tangible assets	5.1. Natural disasters and other incidents		1 918	0,1%
6. Business interruption and system errors	6.1. Systems		208	0,0%
	7.1. Reception, execution, execution and maintenance of transactions		32 494	1,8%
7. Execution of transactions, delivery and management of operating processes	7.2. Monitoring and presentation of reports		0	0,0%
	7.3. Acceptance of customers and documentation		0	0,0%
	7.4. Customer account management		0	0,0%
	7.5. Trade counterparties other than the Bank's clients (e.g. clearing chambers)		-246	0,0%
	7.6. Distributors and suppliers		27	0,0%

The data presented in the table above does not include events bordering on credit risk; the data includes provisions, but does not include recoveries or gains from operational risk.

In 2025 the highest level of operational losses was observed in category "Customers, products and operating practices – Defective products" (4.3). The level of losses was mainly caused by provisions and losses for legal risk concerning the portfolio of foreign currency mortgage loans: PLN 1 724m (data includes exchange rate differences). The high level of operational risk losses in the aforementioned category results from the questioning of contractual provisions in terms of abusiveness, and the change in the level of write-offs reflects the changing trends in jurisprudence and the increase in court cases.

The Santander Bank Polska S.A. Group S.A. also belongs to the external database of operational incidents conducted by The Polish Bank Association (ZBP) and uses other sources of information concerning the external operational incidents. The analysis of the collected data enables to carry out benchmark and defines lessons to be learned regarding the incidents materialized out of the Group.

The Santander Bank Polska S.A. Group S.A. is monitoring the risk indicators. Monitoring is based on financial, operational and technological indicators. The indicators provide early warning of emerging threats and supports observation of the risk profile placed in the Bank and in the Group.

Operational risk reporting process is aimed at delivering the current and adequate information to the management. Operational issues reporting includes information on inter alia, operational events and losses, incidents in the area of information security and business continuity, risk indicators and defined risk mitigation actions.

Information on risk protection and mitigation

The process of mitigating action management is to eliminate or reduce operational risk. The analysis conducted with the help of the operational risk tools (like operation events database, risk indicators, risk self-assessment, scenario analysis, internal controls certification results) are the basis to define risk mitigating actions.

Ensuring an appropriate level of information security and security of the ICT environment is a key aspect of the Bank's operations. At Santander Bank Polska S.A., there is an Information Security Management System that is certified in accordance with ISO / IEC 27001:2022. Information security management includes supervision over processes supporting information security in the Santander Bank Polska S.A. Group business environment and assessment of adequacy of information security and information systems requirements.

One of the elements of risk mitigation is business continuity management process. Each organisation unit is required to develop and update its business continuity management plans to prevent from interrupting the key business processes in case of unplanned disruption. BCM plans are tested on a regular basis to provide assurance to Santander Bank Polska S.A. Group that key business processes

are able to be restored at the required service level and within the agreed timeframe. The Group has backup solutions which makes it able to restore activity in case of any crisis takes place.

For the purpose of operational risk mitigation, Santander Bank Polska S.A. Group is also protected against the materialization of operational risk by means of an operational risk insurance policy, covering individual types of financial risk, property insurance, cyber risk, civil liability, as well as a motor insurance policy.

The Santander Bank Polska S.A. Group does not disclose EU OR1, EU OR2 and EU OR3 tables in accordance with Article 13 (1) of the CRR Regulation.

Compliance Risk

Introduction

Santander Bank Polska S.A. as a universal bank providing a wide array of financial services to retail and business customers, a parent company in a capital group providing a number of additional specialised financial services, and as an important member of the Polish banking system, is exposed to the compliance risk mainly in the following areas:

- Domestic and international regulations concerning the type of offered products and service delivery methods applied by the bank and Capital Group (in particular: the legislation on consumer and competition protection, capital markets, financial markets etc.);
- Good practice codes and other regulations that the Capital Group has adopted for application, i.a. in connection with membership in domestic or international sectoral associations;
- Generally applicable laws regarding the employment law, health and safety at work, taxes, accounting, personal data protection etc. which are binding for all enterprises operating in Poland;
- Domestic and international (mainly: EU) sectoral regulations in the area of reporting, prudential standards, functioning on capital and investment market, prevention of money laundering and terrorist financing etc.

Risk management structure and organisation

Compliance risk is defined as the risk of legal or regulatory sanctions, significant financial loss or negative impact on reputation that the Bank may suffer due to its failure to comply with the law, internal regulations and market standards. Compliance risk consists of the following risk categories:

- Regulatory risk;
- Conduct risk;
- Reputational risk;
- Financial crime risk.

The Bank attaches particular importance to compliance delivered through management and control of compliance risk in the form of identification and risk assessment, controls, independent monitoring and reporting.

The control function is rendered by the so-called three lines of defence. The first line of defence is the operational risk management, the second line consists in on-going vertical verification and vertical testing, while the internal audit units provide the third line of defence.

Compliance duties of the second line of defence in the Bank are rendered by the Compliance Unit and other organisational units operating under internal regulations, in particular:

- For obligations in the field of counteracting money laundering and terrorist financing and in the field of compliance with international sanction programs - the AML unit;
- Compliance with employment law – HR Division;
- Compliance with company law – Corporate Governance unit;

- Compliance with health and safety regulations – the Business Partnership Division;
- Compliance with taxation law and reporting requirements – Financial Accounting and Control Division;
- Compliance with prudential regulations – Risk Management Division;
- Compliance with data protection – Data Protection Officer Unit;
- Separated business of Santander Brokerage House – Support and Compliance Office, Supervision Inspector.

The bank's Management Board adopted an amended Compliance Policy (recent update in May 2025), which was approved by the Supervisory Board. As part of the implementation of the Policy the Compliance Unit have the relevant mandate to support senior managers in effective management of the compliance risk and to report all compliance issues to the Bank's Management Board and Audit and Compliance Committee of the Supervisory the Management Board and to the Audit and Compliance Committee of the Supervisory Board. These bodies ensure compliance with regulatory obligations and approve internal control rules and the Policy framework, and make sure that the Compliance Unit is independent from business units and has relevant resources to perform its tasks. The head of the Compliance Unit reports directly to the Member of the Management Board responsible for the compliance risk supervision and has direct access to the Audit and Compliance Committee of the Supervisory Board and to the Supervisory Board.

The bank's Management Board and the Supervisory Board – especially through the Audit and Compliance Committee - regularly review key compliance issues identified by the Compliance Unit:

- As part of monitoring of products;
- As part of compliance monitoring;
- As part of the monitoring of proprietary transactions effected by employees;
- Based on the information on regulators' activity;
- As part of the review of upcoming legislative initiatives;
- As part of the review of anti-money laundering initiatives;
- As part of the review of ethical issues;
- As part of the review of customers' complaints.

The Compliance Unit's tasks are delivered through:

- Independent identification, assessment and monitoring of compliance risk that the Group is exposed to (with the focus on new products and services, prevention of money laundering and terrorist financing, protection of confidential information, conflicts of interest or private account shares dealing by employees);
- Providing advice and reporting to the Risk Management Committee, the bank's Management Board and Audit and Compliance Committee on the effectiveness of the processes established to ensure compliance with laws and regulations within its area of responsibility;
- Publication of policies and procedures, providing the management and staff with guidance on compliance risk;
- Centralisation of the approval of new products;
- Strengthening of the principles regarding ethical business conduct;
- Maintaining a communication channel that enables employees to provide (also anonymously) information about suspected unethical behaviour;
- Cooperation with compliance units within the Bank's Capital Group.

Apart from the aforementioned activities, the Compliance Unit actively cooperates with the Corporate Communications and Brand Experience and Risk Management Division in terms of managing of the reputational risk defined as the risk of current or potential negative economic impact to the Bank due to damage to the perception of the Bank on the part of customers, employees, shareholders/investors and the wider community.

Santander Bank Polska Capital Group also has specialised committees supporting the management of the compliance risk in specific areas. These committees consist of the representatives of key organisational units who are competent and duly authorised to make decisions and provide high-quality advice. These committees are as follows:

- Compliance Committee;
- Local Product Marketing and Monitoring Committee;
- AML Decision Making Committee;
- AML Operating Committee.

Risk identification and measurement

With regard to the process of compliance risk management, all employees in the Bank are obliged to identify risk. Compliance Unit is responsible for the implementation of procedures which define the scope and type of information necessary to identify risk, as well as is responsible for their application. Main sources used in the process of compliance risk identification are the following:

- Information on changes and planned changes in the applicable laws;
- Information on new potential abusive contractual clauses;
- Outcomes of the analysis of bank's products and services;
- Outcomes of the analysis of complaints and claims;
- Outcomes of the risk-self assessment processes;
- Analysis of the operational events database;
- Findings of the Compliance Unit in the course of independent monitoring proces and findings of the internal audit unit;
- Information from anonymous channel dedicated to reporting identified non-observance cases;
- Conclusions resulting from supervisory activities executed by authorized institutions (e.g. the Polish Financial Supervision Authority) and activities carried out by other authorized institutions (e.g. the President of the Competition and Consumer Protection Office, Financial Ombudsman).

Compliance risk measurement is carried out as part of the independent monitoring process, risk self-assessment and observation of risk indicators.

Based on information obtained as part of risk identification and risk measurement, the bank performs quarterly overall assessment of the compliance risk.

Risk reporting

Compliance Unit submits periodical reports on the process of compliance risk management, to the Bank's Management Board, Audit and Compliance Committee and directly to Supervisory Board.

Reports are submitted on a quarterly basis and covers in particular:

- Outcomes of the identification of compliance risk, including major changes in applicable laws, internal regulations and market standards;
- Outcomes of the compliance risk Assessment, including level of the overall compliance risk assessment;
- Outcomes of functioning of the most important mechanisms of compliance risk control (analysis of new products and services, compliance risk indicators);
- Outcomes of compliance monitoring process (including vertical testing of control mechanisms);
- Level of implementation of the Compliance Assurance Programme.

Conflict management

Santander Bank Polska S.A. and its subsidiaries effectively manage potential and actual conflicts of interest that might give rise to risks of damage to the interests of Customers and other parties.

The Bank effectively manages conflicts of interest on three levels. The first level is to avoid situations that may lead to a potential conflict. The second level is to take organisational actions by the Bank to prevent conflicts of interest and, should such conflicts happen, to ensure they are managed in a way that does not violate the interests of any entities concerned. If the existing procedures and organisational solutions do not effectively prevent the risk of conflicts of interest, on the third the conflict of interest is disclosed.

In order to manage such situations, the Bank has implemented the Conflict of Interest Prevention Policy ("Policy").

This document establishes:

- Circumstances which may lead to or represent an actual conflict of interest (with a particular focus on conflicts between the Bank and its customers, conflicts among customers; as well as conflicts between the Bank and its shareholders, the Bank and its associates/ subsidiaries, and the Bank and members of its governing bodies);
- Procedures and organisational measures to prevent and manage conflicts of interest effectively, including: appropriate assignment of roles and responsibilities, transparent procedures governing transactions with related persons/ entities, segregation of tasks related to the provision of services from those related to oversight and reporting; setting up information barriers; preventing undue influence on a given activity by persons actively engaged in that task (including persons from outside the Bank), preventing situations where the same person performs activities related to different services simultaneously or consecutively if it could have an adverse impact on the proper management of conflicts of interest, assessing business partners with regard to their compliance with the obligation to prevent conflicts of interest.

The Policy is in addition to the rules of preventing and managing conflicts of interest set out in other internal regulations of the Bank, including in:

- General Code of Conduct;
- Guidelines for Bank employees concerning non-competition and membership in supervisory and management boards of commercial companies on their own behalf outside the Bank;
- Guidelines on gifts and invitations at Santander Bank Polska S.A.;
- Code of Conduct in Securities Markets;
- Code of Conduct for Research Activity;
- Procurement Policy;
- Remuneration Policy of Santander Bank Polska S.A. Group .

III. Own funds

The level of own funds of the Santander Bank Polska S.A. Group is adjusted to the Group's business.

Own funds are calculated in accordance with the Banking Law and the rules set out in Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 as amended.

According to CRR, own funds of the Group are a sum of:

- Tier I capital;
- Tier II capital.

Tier I capital consists of:

- Common Equity Tier I capital, which is a sum of items of Common Equity Tier I capital items after adjustments, deductions and inclusions;
- Additional Tier I capital.

Tier II capital includes items of Tier II capital after deductions.

Common Equity Tier I consists of:

1. Share capital, fully paid and registered at its nominal value.
2. Emission premium.
3. Supplementary capital.
4. Profit or loss eligible– pursuant to Art. 26 of CRR, the non-audited profit for the current period or the annual profit may be included in Common Equity Tier I capital, as long as the Bank is granted approval from a relevant authority (KNF in this case). Relevant authority shall issue the approval on conditions that:
 - a. Profits have been verified by institution-independent persons responsible for analysing financial statements of the institution;
 - b. The institution has satisfactorily proved that the profit amount has been reduced by all foreseeable encumbrances and dividends.
5. Accumulated other comprehensive income.
6. Other reserves.
7. Funds for general banking risk.
8. Minority interest recognised in Common Equity Tier I capital – calculated in line with the standards indicated in Art. 84 of CRR.
9. Adjustment and deductions from Common Equity Tier I items:
 - a. Additional value adjustments due to the requirements of prudent valuation – acc. to Article 34 and 105 of CRR;
 - b. Goodwill arising on acquisition;
 - c. Other intangible assets;
 - d. Surplus of deferred tax assets or liabilities exceeding 10% of Tier I - according to EBA's interpretation re. inclusion of assets and reserves under deferred tax, in line with the answer Q&A 2014_980, the Bank nets deferred tax assets and deferred tax liabilities in order to determine the threshold value necessary to calculate the deductible amount;
 - e. Surplus of material exposure in financial sector institutions exceeding 10% of Tier I;

- f. Portion of deferred income tax assets depending on future profitability and arising from temporary differences, as well as direct and indirect holdings in Common Equity Tier I instruments, where the institution has invested a considerable amount of funds, which shall be deducted;
- g. Defined benefit pension fund assets;
- h. Cash flow hedge reserve;
- i. Securitisation positions which can alternatively be subject to a 1 250% risk weight;
- j. Shortage of coverage due to non-performing exposures acc. to Article 47 of CRR;
- k. Own CET1 instruments.

Tier II capital includes eligible subordinated loans of the bank and instruments issued by subsidiaries that are given recognition in Tier II Capital.

Reconciliation between balance sheet items used to calculate own funds and regulatory own funds, according to methodology described in Annex to the Commission Implementing Regulation (UE) 2024/3172, is presented in the table below.

K_66.02 - EU CC2 - RECONCILIATION OF REGULATORY OWN FUNDS TO BALANCE SHEET IN THE AUDITED FINANCIAL STATEMENTS AS AT 31 DECEMBER 2025 (PLN K)

	Balance sheet as in published financial statements		Reference
	As at period end	Under regulatory scope of consolidation	
	As at period end	As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements			
1 Cash and balances at central banks	30 504 739	30 504 739	
2 Loans and advances to banks	2 371 648	2 371 648	
3 Financial assets held for trading	15 278 611	15 278 611	
4 Hedging derivatives	2 023 727	2 023 727	
5 Loans and advances to customers	162 837 725	162 837 725	
6 Buy-sell-back transactions	4 417 364	4 417 364	
7 Investment securities	78 865 681	78 865 681	
8 Assets pledged as collateral	2 575 358	2 575 358	
9 Investments in associates	990 738	990 738	
10 Intangible assets	987 651	987 651	(g)
11 Goodwill	1 688 516	1 688 516	(g)
12 Property, plant and equipment	764 514	764 514	
13 Right of use assets	542 586	542 586	
14 Current income tax assets	0	0	
15 Net deferred tax assets	666 797	666 797	(f)
16 Assets classified as held for sale	8	8	
17 Group assets classified as held for sale	0	0	
18 Other assets	3 634 415	3 634 415	
Total assets	308 150 078	308 150 078	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements			
1 Deposits from banks	2 847 280	2 847 280	
2 Hedging derivatives	192 875	192 875	
3 Financial liabilities held for trading	12 363 423	12 363 423	
4 Deposits from customers	230 142 564	230 142 564	
5 Sell-buy-back transactions	2 580 543	2 580 543	
6 Subordinated liabilities	1 601 965	1 601 965	(e)
7 Debt securities in issue	14 513 671	14 513 671	
8 Lease liabilities	389 100	389 100	
9 Current income tax liabilities	1 072 135	1 072 135	
10 Deferred tax liability	432	432	
11 Other provisions	2 381 834	2 445 562	
12 Other liabilities	4 559 028	4 495 300	
Total liabilities	272 644 852	272 644 852	
Equity			
Equity attributable to owners of Santander Bank Polska S.A.	35 425 671	35 425 671	
13 Share capital	1 021 893	1 021 893	(a)
14 Share premium	7 981 974	7 981 974	(a)
15 Accumulated other comprehensive income (and other reserve capital)	15 680 258	15 680 258	(c)
16 General banking risk funds	649 810	649 810	(d)
17 Retained earnings	3 612 923	3 612 923	(b)
18 Profit for the current period	6 478 814	6 478 814	
19 Non-controlling interests in equity	79 554	0	
20 Total equity	35 505 226	35 425 671	
Total liabilities and equity	308 150 078	308 070 524	

As at 31 December 2025, the total own funds of the Santander Bank Polska S.A. Group amounted to PLN 26 533 804k. Subordinated liabilities are subject to prudential consolidation, taking into account amortization.

K_66.01 - EU CC1 - COMPOSITION OF REGULATORY OWN FUNDS OF SANTANDER BANK POLSKA S.A. GROUP AS AT 31 DECEMBER 2025 (PLN K)

	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	9 003 867 (a)
	of which: Instrument type 1	9 003 867 (a)
	of which: Instrument type 2	0
	of which: Instrument type 3	0
2	Retained earnings	3 612 923 (b)
3	Accumulated other comprehensive income (and other reserves)	15 680 258 (c)
EU-3a	Funds for general banking risk	649 810 (d)
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	0
5	Minority interests (amount allowed in consolidated CET1)	0
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	0
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	28 946 858
Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments (negative amount)	-79 380
8	Intangible assets (net of related tax liability) (negative amount)	-2 042 005 (g)
9	Not applicable	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	0
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-704 118
12	Negative amounts resulting from the calculation of expected loss amounts	0
13	Any increase in equity that results from securitised assets (negative amount)	0
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	0
15	Defined-benefit pension fund assets (negative amount)	-583
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	0
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0
20	Not applicable	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-171 350
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	0
EU-20c	of which: securitisation positions (negative amount)	-171 350
EU-20d	of which: free deliveries (negative amount)	0
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	0
22	Amount exceeding the 17,65% threshold (negative amount)	0
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	0
24	Not applicable	
25	of which: deferred tax assets arising from temporary differences	0
EU-25a	Losses for the current financial year (negative amount)	0
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	0
26	Not applicable	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	0
27a	Other regulatory adjustments	-64 569
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-3 062 005
29	Common Equity Tier 1 (CET1) capital	25 884 853
Additional Tier 1 (AT1) capital: instruments		
30	Capital instruments and the related share premium accounts	0
31	of which: classified as equity under applicable accounting standards	0
32	of which: classified as liabilities under applicable accounting standards	0
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	0
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	0
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	0
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	0
35	of which: instruments issued by subsidiaries subject to phase out	0
36	Additional Tier 1 (AT1) capital before regulatory adjustments	0

Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	0	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	0	
41	Not applicable		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	0	
42a	Other regulatory adjustments to AT1 capital	0	
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	0	
44	Additional Tier 1 (AT1) capital	0	
45	Tier 1 capital (T1 = CET1 + AT1)	25 884 853	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	648 951	(e)
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	0	
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	0	
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	0	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	0	
49	of which: instruments issued by subsidiaries subject to phase out	0	
50	Credit risk adjustments	0	
51	Tier 2 (T2) capital before regulatory adjustments	648 951	(e)
Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	0	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0	
54a	Not applicable		
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	0	
56	Not applicable		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	0	
EU-56b	Other regulatory adjustments to T2 capital	0	
57	Total regulatory adjustments to Tier 2 (T2) capital	0	
58	Tier 2 (T2) capital	648 951	(e)
59	Total capital (TC = T1 + T2)	26 533 804	
60	Total Risk exposure amount	132 664 295	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	19,51%	
62	Tier 1 capital	19,51%	
63	Total capital	20,00%	
64	Institution CET1 overall capital requirements	4,99%	
65	of which: capital conservation buffer requirement	2,50%	
66	of which: countercyclical capital buffer requirement	0,99%	
67	of which: systemic risk buffer requirement	0,00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1,50%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0,00%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	15,01%	
National minima (if different from Basel III)			
69	Not applicable		
70	Not applicable		
71	Not applicable		
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	1 763	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	1 409 874	
74	Not applicable		
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	666 797	(f)
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	0	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	0	

78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	0
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	0
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	0
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	0
82	Current cap on AT1 instruments subject to phase out arrangements	0
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	0
84	Current cap on T2 instruments subject to phase out arrangements	0
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	0

1. Tier I

Common Equity Tier I

Share capital in accordance with the Bank's Statutes and the entry to the Court Register as at 31 December 2025 amounted to **PLN 1 021 893k**.

Supplementary capital resulting from the sale of shares above their nominal value amounted to of **PLN 7 981 974k**.

Other reserves are created from net profit allocations in an amount approved by the General Meeting of Shareholders. Other reserves are used to cover balance sheet losses if they are greater than the supplementary capital. The decision to resort to the reserve capital is taken by the General Meeting of Shareholders. As at 31 December 2025, after including prudential consolidation adjustments, the other reserves and accumulated other comprehensive income in own funds were **PLN 15 680 258k**.

Funds for general banking risk is intended to cover costs and losses related to unidentified risks of banking activities for which the Bank has not created a separate provision. As at 31 December 2025, the general risk fund for unidentified risks of banking activities amounted to **PLN 649 810k**.

Net profit of Santander Bank Polska S.A. Group from 1 January 2025 to 31 December 2025 totaled **PLN 6 764 845k**, including **PLN 286 031k** of profit attributable to shareholders who do not exercise control. The net profit attributable to shareholders of the parent company in the above period amounted to **PLN 6 478 814k**.

As at 31 December 2025, no part of the profit generated for 2025 was included in own funds.

As at 31 December 2025, **retained earnings** of **PLN 3 612 923k** were included in the own funds of Santander Bank Polska S.A. Group .

In April 2025, the General Meeting of Santander Bank Polska S.A. Shareholders agreed on the distribution of the net profit of **PLN 5 197 480k** for the accounting year from 1 January 2024 to 31 December 2024 as follows:

- PLN 3 897 632k was allocated to the dividend for shareholders;
- PLN 104 130k was allocated to capital reserves;
- PLN 1 195 718k kept undistributed.

Additionally, It was decided to allocate to dividend for shareholders the amount of **PLN 840 887k** out of the Dividend Reserve created by force of resolution no. 6 of the Annual General Meeting of 22 March 2021 on profit distribution and creation of capital reserve ("Resolution No. 6/2021"). Total amount allocated for Dividend was **PLN 4 738 518k**.

102,189,314 (say: one hundred two million, one hundred eighty nine thousand and three hundred fourteen) series A, B, C, D, E, F, G, H, I, J, K, L, M, N and O shares give entitlement to the Dividend.

Dividend per one share was **PLN 46.37**.

The Dividend record day was 13 May 2025 and the Dividend was paid out on 20 May 2025.

EU CCA: MAIN FEATURES OF REGULATORY OWN FUNDS INSTRUMENTS AND ELIGIBLE LIABILITIES INSTRUMENTS AS AT 31 DECEMBER 2025 (PLN MLN)

1	Issuer	Santander Bank Polska S.A.	Santander Bank Polska S.A.	Santander Bank Polska S.A.	Santander Bank Polska S.A.	Santander Bank Polska S.A.	Santander Bank Polska S.A.	Santander Bank Polska S.A.
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	PLBZ00000044	n/a	PLBZ00000275	PLBZ00000341	PLBZ00000358	XS3200021684	PLBZ00000366
2a	Public or private placement	Public	Private	Public	Public	Public	Public	Public
3	Governing law(s) of the instrument	polish	english	polish	polish	polish	english	polish
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	Yes	Yes	Yes	Yes	Yes	Yes
	Regulatory treatment	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier I	Tier II	Tier II	eligible liabilities	eligible liabilities	eligible liabilities	eligible liabilities
5	Post-transitional CRR rules	Common Equity Tier I	Tier II	Tier II	eligible liabilities	eligible liabilities	eligible liabilities	eligible liabilities
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	solo and consolidated	solo and consolidated	solo and consolidated	solo and consolidated	solo and consolidated	solo and consolidated	solo and consolidated
7	Instrument type (types to be specified by each jurisdiction)	shares - Common Equity Tier I as published in CRR article 28	Tier II as published CRR article 63	Tier II as published in CRR article 63	Senior non preferred	Senior non preferred	Senior non preferred	Senior unsecured
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	PLN 1 021,893 m	PLN 579.48 m	PLN 1 000 m	PLN1 900 m	PLN 1 800 m	PLN 2 113.35 m	PLN 3 0000 m
9	Nominal amount of instrument	10 PLN Series A: 10 PLN; Series B: 10 PLN Series C: 10 PLN; Series D: 102 PLN Series E: 102 PLN; Series F: 40 PLN Series G: 10 PLN; Series H: 10 PLN Series I: 212.60 PLN; Series J: "Share Exchange Ratio" re. the merger of Santander Bank Polska S.A. with Kredyt Bank, pursuant to Resolution no. 2 of the Extraordinary Meeting of Santander Bank Polska S.A. Shareholders, dd. 30.07.2012 r. Series K: 10 PLN; Series L: PLN 400.53; Series M: 10 PLN Series N: "Share Exchange Ratio" re. the merger of Santander Bank Polska S.A. with Deutsche Bank Polska S.A., pursuant to Resolution no. 3 of the Extraordinary Meeting of Santander Bank Polska S.A. Shareholders, dd. 29.05.2018 r. Series O: 10 PLN	EUR 137.1 m	PLN 1 000 m	PLN1 900 m	PLN 1 800 m	EUR 500 m	PLN 3 0000 m
EU-9a	Issue price	Shareholders, dd. 30.07.2012 r. Series K: 10 PLN; Series L: PLN 400.53; Series M: 10 PLN Series N: "Share Exchange Ratio" re. the merger of Santander Bank Polska S.A. with Deutsche Bank Polska S.A., pursuant to Resolution no. 3 of the Extraordinary Meeting of Santander Bank Polska S.A. Shareholders, dd. 29.05.2018 r. Series O: 10 PLN	100% of nominal value	100% of nominal value	100% of nominal value	100% of nominal value	99.815% of nominal value	100% of nominal value
EU-9b	Redemption price	N/A	100% of nominal value	100% of nominal value	100% of nominal value	100% of nominal value	100% of nominal value	100% of nominal value
10	Accounting classification	Shareholders' equity Series A: 08.11.1991 Series B: 21.12.1996 Series C: 31.12.1996 Series D: 25.10.1999 Series E: 17.05.2000 Series F: 30.11.2000 Series G: 13.06.2001 Series H: 10.07.2009 Series I: 09.08.2012 Series J: 04.01.2013 Series K: 11.07.2014 Series L: 18.07.2014 Series M: 03.08.2017 Series N: 27.11.2018 Series O: 25.09.2020	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance		22-05-2017	05-04-2018	02-04-2024	30-09-2024	07-10-2025	01-12-2025

III. OWN FUNDS

12	Perpetual or dated	N/A	dated	dated	dated	dated	dated	dated
13	Original maturity date	No maturity	22-05-2027	05-04-2028	02-04-2027	30-09-2027	07-10-2031	01-12-2028
14	Issuer call subject to prior supervisory approval	N/A	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	2022-05-22, EUR 137,1 m	05.04.2023, PLN 1 000 m	2026-04-02, PLN 1 900 m	2026-09-30, PLN1 800 m	2030-10-07, EUR 500 m	2027-12-01, 2028-06-01, PLN 3 000 m
16	Subsequent call dates	N/A	each interest period, every 6 months (after five years)	each interest period, every 6 months (after five years)	Event of default	Event of default	Event of default	Event of default
Coupons / dividends								
17	Fixed or floating dividend/coupon	Floating	Floating	Floating	Floating	Floating	Fixed	Floating
18	Coupon rate and any related index	N/A	EURIBOR 6M + spread	WIBOR6M + spread	WIBOR6M + 0,015	WIBOR6M + 0,014	3,50%	WIBOR6M + 0,011
19	Existence of a dividend stopper	No	N/A	N/A	N/A	N/A	N/A	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	N/A	N/A	N/A	N/A	N/A	N/A
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	N/A	N/A	N/A	N/A	N/A	N/A
21	Existence of step up or other incentive to redeem	N/A	No	No	No	No	No	No
22	Noncumulative or cumulative	Noncumulative	N/A	N/A	N/A	N/A	N/A	N/A
23	Convertible or non-convertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	No	No	No	No	No	No	No
31	If write-down, write-down trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	N/A	Statutory	Statutory	Statutory	Statutory
EU-34b	Ranking of the instrument in normal insolvency proceedings	Category 10	Category 8	Category 8	Category 6	Category 6	Category 6	Category 3d
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	N/A	the lowest priority of satisfaction and will rank only to the extent permitted by applicable laws relating to creditors' right	the lowest priority of satisfaction and will rank only to the extent permitted by applicable laws relating to creditors' right	SNP debt in subordination hierarchy	SNP debt in subordination hierarchy	SNP debt in subordination hierarchy	senior debt in subordination hierarchy
36	Non-compliant transitioned features	No	No	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A	N/A	N/A	https://www.santander.pl/en/investor-relations/reports/reports-list/current-report-no-15-2024	https://www.santander.pl/en/investor-relations/reports/reports-list/current-report-no-36-2024	https://www.santander.pl/en/investor-relations/reports/reports-list/current-report-no-30-2025	https://www.santander.pl/en/investor-relations/reports/reports-list/current-report-no-31-2025

All shares issued by the Santander Bank Polska S.A. are admitted and introduced to public trading on the Warsaw Stock Exchange.

Adjustments and deductions from Common Equity Tier I

Goodwill reducing Tier I capital at the consolidated level as at 31 December 2025 amounted to PLN **(1 688 516)k**. Goodwill arose as a result of the merger of Santander Bank Polska S.A. with bank Kredyt Bank S.A. on 4 January 2013. The above goodwill was recognised as at the date of the merger with Kredyt Bank S.A. and represents a control premium. It resulted from the possibility of achieving additional benefits from anticipated synergies, revenue growth, market share gained, and the combination of employee competencies and increased process efficiency in relation to the fair value of the net assets acquired.

As at 31 December 2025, deduction from Common Equity Tier I regarding other intangible assets amounted to PLN **(353 489)k**. The value of the shortage in coverage due to non-performing exposures amounted to PLN **(64 569)k**. The value of securitisation positions which can alternatively be subject to a 1 250% risk weight amounted to PLN **(171 350)k**.

Santander Bank Polska S.A. Group has calculated the additional value adjustments due to the requirements for prudent valuation according to articles 34 and 105 of CRR. It amounted to PLN **(79 380)k**.

K_65.00 - EU PV1 - PRUDENT VALUATION ADJUSTMENTS (PVA) AS AT 31 DECEMBER 2025 (PLN K)

Category level AVA	Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification		
	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book	
1 Market price uncertainty	22 517	11 567	0	34 662	0	415	0	34 580	1 112	33 468
2 Not applicable										
3 Close-out cost	0	27 442	0	1 392	0	1 057	0	14 946	3 701	11 245
4 Concentrated positions	24 253	0	0	0	0	0	0	24 253	0	24 253
5 Early termination	0	0	0	0	0	0	0	0	0	0
6 Model risk	0	0	0	0	0	1 296	0	648	648	0
7 Operational risk	1 143	1 980	0	1 830	0	0	0	4 953	481	4 471
8 Not applicable										
9 Not applicable										
10 Future administrative costs	0	0	0	0	0	0	0	0	0	0
11 Not applicable										
12 Total Additional Valuation Adjustments (AVAs)								79 380	5 942	73 438

For the purposes of assessing its capital adequacy, the Santander Bank Polska S.A. Capital Group did not take into account the full impact of the implementation of IFRS 9 until the end of 2024, applying transitional solutions provided for in Regulation No. 2017/2395 amending Regulation (EU) No. 575/2013, and subsequently updated in accordance with Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020. Based on the above changes, the Group applied a derogation in the form of assigning a risk weight of 100% to the value of the adjustment included in own funds. From the beginning of 2025, after the end of the transitional period, the Group will take into account the full impact of the implementation of IFRS 9.

2. Tier II

Subordinated liabilities

Own funds of Santander Bank Polska S.A. Group include:

- Pursuant to the KNF decision of 19 October 2017 (letter No. DBK/DBK 2/7100/1/14/2017), the subordinated bonds of EUR 137.1m issued by Santander Bank Polska S.A. on 22 May 2017, maturing on 22 May 2027 and taken up by an investor, were allocated to Tier II capital;
- Pursuant to the Decision of KNF of 6 June 2018 (document DBK-DBK2.7100.3.2018.) subordinated loan PLN 1b, issued by Santander Bank Polska S.A. on 5th April 2018, with maturity of 5 May 2028 were allocated to Tier II capital.

The subordinated liabilities listed above are subject to amortisation in accordance with Article 64 of the CRR. Pursuant to the decision of the Polish Financial Supervision Authority of 1 September 2025 authorising the early repayment of Tier II capital instruments in the form of subordinated bonds with a total nominal value of EUR 120 000 000, issued on 2 December 2016, the Bank exercised the call option on these instruments on 3 December 2025, thereby reducing the value of subordinated liabilities recognised in Tier II capital.

From 3 December 2021, the amount of the first and from 22 May 2022, the amount of the second and from 5 April 2023, the amount of the third of the above-mentioned subordinated loans are amortized due to the final 5 years of maturity, in accordance with Art. 64 CRR.

Hence, as at 31 December 2025, own funds include subordinated liabilities of PLN **648 951k**.

More details about the subordinated liabilities are presented in Note 34 to the Consolidated Financial Statements of the Santander Bank Polska S.A. Group for 2025.

3. Own funds and eligible liabilities

The information presented is in accordance with the requirements set forth by Commission Implementing Regulation (EU) 2021/763 of April 23, 2021, laying down implementing technical standards for the application of Regulation (EU) No. 575/2013 of the European Parliament and of the Council and Directive 2014/59/EU of the European Parliament and of the Council with regard to supervisory reporting in the area of minimum own funds requirement and eligible liabilities, and public disclosure thereof. Santander Bank Polska S.A., as a subsidiary that is part of the Santander cross-border group with its parent company, Banco Santander, belongs to a group defined as a global systemically important institution.

Santander Bank Polska S.A. as subsidiary of Santander Group, a global systemically important institution, is required to comply with Article 92a of the CRR with respect to the obligation to satisfy the requirements for own funds and bailed-in liabilities laid down in the CRR.

According to Article 92a of the CRR, the requirements for own funds and eligible liabilities are calculated as 18% of the total risk exposure amount ("TREA") and 6.75% of the total exposure measure ("TEM").

Based on these provisions, the required minimum regulatory TLAC (total loss-absorbing capacity) is increased by the value of capital buffers that the Bank is required to maintain.

This means that the minimum regulatory TLAC must be maintained at 22,99% of the TREA as at 31 December 2025.

For Santander Bank Polska S.A. Group, the TLAC calculated as own funds and eligible liabilities in relation to the TREA as at 31 December 2025 is 27.35%. The TLAC calculated as own funds and eligible liabilities in relation to the TEM as at 31 December 2025 is 11.21%.

In relation to the minimum requirements specified in Article 92a of the CRR, the Bank obtained the approval from resolution authorities, in accordance with the conditions laid down in Article 72b(3) of the CRR, to use the liabilities that do not meet the subordination requirement defined in Article 72b(2)(d) of the CRR in the amount not exceeding 3.5% of the TREA.

The Bank is also required to meet the requirements for own funds and eligible liabilities (MREL) based on Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms.

Based on the decision provided by the Bank Guarantee Fund of 22 April 2025, the target value of the MREL requirement for the Bank is 15.36% in relation to the total risk exposure amount (the subordination requirement is 15.22%) and 5.91% in relation to the total exposure measure.

At the same time in accordance with Article 19(2)(3), Article 21(3)(3), Article 42(3) and Article 48(3) of the Act on macro-prudential supervision, which transposes Article 128 of the CRD, Common Equity Tier 1 instruments maintained by the entity in accordance with the combined buffer requirement are not eligible for the MREL requirement expressed as a percentage of the total risk exposure. This rule does not apply to the MREL requirement expressed as a percentage of the total exposure measure.

As a result, the Bank needs to maintain the target MREL as at 31 December 2025 at 20.35% in relation to the total amount of risk exposure, including in respect of subordination at 20.21%.

As at 31 December 2025, the Bank met the applicable minimum MREL requirements. The MREL ratio in relation to TREA was 27.35%, while the MREL including own funds and eligible subordinated liabilities was 25.08%. As at 31 December 2025, the MREL in relation to the TEM was 11.21%, in relation to subordinated debt 10.28%.

K_90.01 - EU KM2: KEY METRICS – MREL SANTANDER BANK POLSKA S.A. GROUP (PLN K)

	Minimum requirement for own funds and eligible liabilities (MREL)		G-SII Requirement for own funds and eligible liabilities (TLAC)			
	a	b	c	d	e	f
	31.12.2025	31.12.2025	30.09.2025	30.06.2025	31.03.2025	31.12.2024
Own funds and eligible liabilities, ratios and components						
1 Own funds and eligible liabilities	36 277 683	36 277 683	34 922 548	34 690 117	34 413 017	34 272 990
EU-1a Of which own funds and subordinated liabilities	33 277 683					
2 Total risk exposure amount of the resolution group (TREA)	132 664 295	132 664 295	148 884 973	148 260 004	144 593 326	147 720 782
3 Own funds and eligible liabilities as a percentage of TREA (row1/row2)	27,35%	27,35%	23,46%	23,40%	23,80%	23,20%
EU-3a Of which own funds and subordinated liabilities	25,08%					
4 Total exposure measure of the resolution group	323 557 262	323 557 262	333 706 772	328 865 883	331 862 729	319 718 445
5 Own funds and eligible liabilities as percentage of the total exposure measure	11,21%	11,21%	10,47%	10,55%	10,37%	10,72%
EU-5a Of which own funds or subordinated liabilities	10,28%					
6a Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption)		No	No	No	No	No
6b Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities in instruments if the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption)		3 000 000	3 100 000	3 100 000	3 100 000	3 100 000
6c Pro-memo item: If a capped subordination exemption applies under Article 72b (3) CRR, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)		100%	100%	100%	100%	100%
Minimum requirement for own funds and eligible liabilities (MREL)*						
TLAC expressed as a percentage of TREA		18,00%	18,00%	18,00%	18,00%	18,00%
TLAC expressed as a percentage of TEM		6,75%	6,75%	6,75%	6,75%	6,75%
EU-7 MREL requirement expressed as percentage of the total risk exposure amount	15,36%					
EU-8 Of which to be met with own funds or subordinated liabilities	15,22%					
EU-9 MREL requirement expressed as percentage of the total exposure measure	5,91%					
EU-10 Of which to be met with own funds or subordinated liabilities	5,91%					

The table above presents the minimum requirement for own funds and eligible liabilities (MREL), excluding the combined buffer requirement.

The data for the reporting periods from December 2024 to September 2025 include information on Santander Consumer Bank S.A. and its subsidiaries. The data for the reporting periods December 2024 and March 2025 include profits included in own funds, in accordance with the applicable EBA guidelines.

The Santander Bank Polska S.A. Group does not disclose the EU ILAC, EU TLAC2a, EU TLAC2b, EU TLAC3b tables. These tables apply to institutions that are not subject to resolution, global systemically important institutions (G-SIIs) or entities outside the EU.

III. OWN FUNDS

K_91.00 - EU TLAC1 - POSITION OF SANTANDER BANK POLSKA S.A. GROUP AS AT 31 DECEMBER 2025 (PLN K)

	Minimum requirement for own funds and eligible liabilities (MREL)	G-SII requirement for own funds and eligible liabilities (TLAC)	Memo item: Amounts eligible for the purposes of MREL, but not TLAC
Own funds and eligible liabilities and adjustments			
1 Common Equity Tier 1 capital (CET1)	25 884 853	25 884 853	0
2 Additional Tier 1 capital (AT1)	0	0	0
3 Empty set in the EU			
4 Empty set in the EU			
5 Empty set in the EU			
6 Tier 2 capital (T2)	648 951	648 951	0
7 Empty set in the EU			
8 Empty set in the EU			
11 Own funds for the purpose of Articles 92a CRR and 45 BRRD	26 533 804	26 533 804	0
Own funds and eligible liabilities: Non-regulatory capital elements			
12 Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	5 813 350	5 813 350	0
EU-12a Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)	0	0	0
EU-12b Eligible liabilities instruments that are subordinated to excluded liabilities, issued prior to 27 June 2019 (subordinated grandfathered)	0	0	0
EU-12c Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	930 529	930 529	0
13 Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre cap)	3 000 000	3 000 000	0
EU-13a Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)	0	0	0
14 Amount of non subordinated instruments eligible, where applicable after application of Article 72b (3) CRR	3 000 000	3 000 000	0
15 Empty set in the EU			
16 Empty set in the EU			
17 Eligible liabilities items before adjustments	9 743 879	9 743 879	0
EU-17a Of which subordinated	6 743 879	6 743 879	0
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements			
18 Own funds and eligible liabilities items before adjustments	36 277 683	36 277 683	0
19 (Deduction of exposures between MPE resolution groups)		0	
20 (Deduction of investments in other eligible liabilities instruments)		0	
21 Empty set in the EU			
22 Own funds and eligible liabilities after adjustments	36 277 683	36 277 683	0
EU-22a Of which own funds and subordinated	33 277 683		
Risk-weighted exposure amount and leverage exposure measure of the resolution group			
23 Total risk exposure amount	132 664 295	132 664 295	0
24 Total exposure measure	323 557 262	323 557 262	0
Ratio of own funds and eligible liabilities			
25 Own funds and eligible liabilities (as a percentage of total risk exposure amount)	27,35%	27,35%	0,00%
EU-25a Of which own funds and subordinated	25,08%		
26 Own funds and eligible liabilities (as a percentage of total exposure measure)	11,21%	11,21%	0,00%
EU-26a Of which own funds and subordinated	10,28%		
27 CET1 (as a percentage of TREA) available after meeting the resolution group's requirements	9,35%	9,35%	
28 Institution-specific combined buffer requirement		4,99%	
29 of which: capital conservation buffer requirement		2,50%	
30 of which: countercyclical buffer requirement		0,99%	
31 of which: systemic risk buffer requirement		0,00%	
EU-31a of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer		1,50%	
Memorandum items			
EU-32 Total amount of excluded liabilities referred to in Article 72a(2) CRR		125 508 177	

K_97.00 - EU TLAC3A: CREDITOR RANKING - RESOLUTION ENTITY AS AT 31 DECEMBER 2025 (PLN K)

1 Description of insolvency ranking	Insolvency ranking					Sum of 1 to n
	1	2	3	4	5	
	(most junior)				highest junior	
2 Liabilities and own funds	26 620 711	0	658 591	944 354	8 900 254	37 123 911
3 of which excluded liabilities	0	0	9 640	13 825	86 904	110 369
4 Liabilities and own funds less excluded liabilities	26 620 711	0	648 951	930 529	8 813 350	37 013 542
5 Subset of row 4 that are own funds and liabilities potentially eligible for meeting [choose as appropriate: TLAC/ MREL]	26 620 711	0	648 951	930 529	8 813 350	37 013 542
6 of which residual maturity ≥ 1 year < 2 years	0	0	176 979	402 502	3 700 000	4 279 481
7 of which residual maturity ≥ 2 year < 5 years	0	0	471 973	528 027	3 000 000	4 000 000
8 of which residual maturity ≥ 5 years < 10 years	0	0	0	0	2 113 350	2 113 350
9 of which residual maturity ≥ 10 years, but excluding perpetual securities	26 620 711	0	0	0	0	26 620 711
10 of which perpetual securities	0	0	0	0	0	0

IV. Capital requirements

1. Total capital requirements

The capital requirements of Santander Bank Polska S.A. Group are set in accordance with part III of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, as amended, which was the official legal basis as at 31 December 2025.

In 2025, Santander Bank Polska S.A. applied the standardised approach to the calculation of capital requirement for credit and market risks and a new standardized approach for calculating the capital requirement for operational risk. Under this approach the total capital requirement for credit risk is calculated as a sum of risk-weighted assets multiplied by 8%. To calculate risk-weighted exposures, risk weights are allocated to all exposures in accordance with the CRR as amended. The Group measures its balance sheet assets and liabilities in accordance with International Accounting Standards and International Financial Reporting Standards.

The Bank calculates and monitors capital requirements for all key risks, including:

- Capital requirement for credit risk;
- Capital requirement for market risk, including:
 - ✓ Capital requirement for positions risk, including:
 - Specific and general risk of debt instruments;
 - Specific and general risk of equity instruments;
 - ✓ Capital requirement for FX risk;
- Capital requirement for the settlement, supplier and counterparty credit risk;
- Capital requirement for credit valuation adjustments;
- Capital requirement for the excess of large exposures limit;
- Capital requirement for the excess of capital concentration limit;
- Capital requirement for operational risk;
- Capital requirement for securitisation.

Santander Bank Polska S.A. Group calculates capital requirement separately for the exposures classified into the banking and trading book.

As at 31 December 2025, the total capital requirements of Santander Bank Polska S.A. Group calculated in line with the CRR was **PLN 10 613 144k**, including:

- for credit risk and counterparty credit risk, credit valuation adjustment risk, securitisation **PLN 8 639 652k**;
- for market risk **PLN 222 788k**;
- for operational risk **PLN 1 750 704k**.

With regard to the operational risk requirement, in connection with the sale of shares in Santander Consumer Bank S.A., pursuant to Article 315(2) of the CRR, the Bank applied to the Polish Financial Supervision Authority for permission to exclude amounts relating to the sold entities or types of activity from the business indicator. The Bank has data allowing it to adjust the business ratio by excluding the relevant categories of income and expenses, thus obtaining an adjusted business ratio for continuing operations. The reduction in the business indicator as a result of the sale of shares in Santander Consumer Bank S.A. will be recognised in the operational risk requirement after obtaining the required approval.

PERCENTAGE BREAKDOWN OF CAPITAL REQUIREMENTS AS AT 31 DECEMBER 2025 AND 31 DECEMBER 2024



K_61.00 - EU KM1 - KEY METRICS TEMPLATE (PLN K)

	31.12.2025	30.09.2025	30.06.2025	31.03.2025	31.12.2024
Available own funds (amounts)					
1 Common Equity Tier 1 (CET1) capital	25 884 853	25 878 657	25 664 598	25 413 073	25 249 668
2 Tier 1 capital	25 884 853	25 878 657	25 664 598	25 413 073	25 249 668
3 Total capital	26 533 804	26 892 238	26 780 173	26 630 101	26 578 050
Risk-weighted exposure amounts					
4 Total risk exposure amount	132 664 295	148 884 973	148 260 004	144 593 326	147 720 782
4a Total risk exposure pre-floor	132 664 295	148 884 973	148 260 004	144 593 326	
Capital ratios (as a percentage of risk-weighted exposure amount)					
5 Common Equity Tier 1 ratio (%)	19,51%	17,38%	17,31%	17,58%	17,09%
5a Not applicable					
5b Common Equity Tier 1 ratio considering unfloored TREA (%)	19,51%	17,38%	17,31%	17,58%	
6 Tier 1 ratio (%)	19,51%	17,38%	17,31%	17,58%	17,09%
6a Not applicable					
6b Tier 1 ratio considering unfloored TREA (%)	19,51%	17,38%	17,31%	17,58%	
7 Total capital ratio (%)	20,00%	18,06%	18,06%	18,42%	17,99%
7a Not applicable					
7b Total capital ratio considering unfloored TREA (%)	20,00%	18,06%	18,06%	18,42%	
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7d Additional own funds requirements to address risks other than the risk of excessive leverage (%)	0,00%	0,00%	0,00%	0,00%	0,01%
EU 7e of which: to be made up of CET1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 7f of which: to be made up of Tier 1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 7g Total SREP own funds requirements (%)	8,00%	8,00%	8,00%	8,00%	8,01%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8 Capital conservation buffer (%)	2,50%	2,50%	2,50%	2,50%	2,50%
EU 8a Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0,00%	0,00%	0,00%	0,00%	0,00%
9 Institution specific countercyclical capital buffer (%)	0,99%	1,00%	0,02%	0,02%	0,02%
EU 9a Systemic risk buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
10 Global Systemically Important Institution buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 10a Other Systemically Important Institution buffer (%)	1,50%	1,00%	1,00%	1,00%	1,00%
11 Combined buffer requirement (%)	4,99%	4,50%	3,52%	3,52%	3,52%
EU 11a Overall capital requirements (%)	12,99%	12,50%	11,52%	11,52%	11,53%
12 CET1 available after meeting the total SREP own funds requirements (%)	12,00%	10,06%	10,06%	10,42%	9,98%
Leverage ratio					
13 Total exposure measure	323 557 262	333 706 772	328 865 883	331 862 729	319 718 445
14 Leverage ratio (%)	8,00%	7,75%	7,80%	7,66%	7,90%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14b of which: to be made up of CET1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14c Total SREP leverage ratio requirements (%)	3,00%	3,00%	3,00%	3,00%	3,00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d Leverage ratio buffer requirement (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14e Overall leverage ratio requirement (%)	3,00%	3,00%	3,00%	3,00%	3,00%
Liquidity Coverage Ratio					
15 Total high-quality liquid assets (HQLA) (Weighted value -average)	96 656 075	92 637 584	88 277 146	83 932 106	80 153 395
EU 16a Cash outflows - Total weighted value	64 186 172	61 716 162	58 461 208	55 601 152	53 178 983
EU 16b Cash inflows - Total weighted value	17 308 789	17 091 538	15 999 047	15 034 456	14 770 379
16 Total net cash outflows (adjusted value)	46 877 383	44 624 624	42 462 161	40 566 696	38 408 604
17 Liquidity coverage ratio (%)	206,6%	207,8%	207,8%	206,7%	209,0%
Net Stable Funding Ratio					
18 Total available stable funding	215 313 116	221 426 855	225 289 087	224 341 645	220 903 388
19 Total required stable funding	136 500 669	146 625 099	146 355 502	141 768 384	142 507 759
20 NSFR ratio (%)	157,7%	151,0%	153,9%	158,3%	155,0%

The data for the reporting periods from December 2024 to September 2025 include information on Santander Consumer Bank S.A. and its subsidiaries. However, data for the reporting periods December 2024 and March 2025 include profits recognised as own funds in accordance with the applicable EBA guidelines. The disclosure requirement in lines 4a, 5b, 6b and 7b was introduced in connection with the entry into force of Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 (CRR III).

K_60.00 - EU OV1 – OVERVIEW OF RWA (PLN K)

	Total risk exposure amounts (TREA)		Total own funds requirements
	a	b	c
	31.12.2025	30.09.2025	31.12.2025
1 Credit risk (excluding CCR)	100 177 048	115 884 575	8 014 164
2 Of which the standardised approach	100 177 048	115 884 575	8 014 164
3 Of which the Foundation IRB (F-IRB) approach	0	0	0
4 Of which slotting approach	0	0	0
EU 4a Of which equities under the simple riskweighted approach	0	0	0
5 Of which the Advanced IRB (A-IRB) approach	0	0	0
6 Counterparty credit risk - CCR	4 182 403	4 239 134	334 592
7 Of which the standardised approach	3 334 979	3 444 360	266 798
8 Of which internal model method (IMM)	0	0	0
EU 8a Of which exposures to a CCP	679 643	665 923	54 371
9 Of which other CCR	167 781	128 850	13 422
10 Credit valuation adjustments risk - CVA risk	1 868 732	1 607 609	149 499
EU 10a Of which the standardised approach (SA)	0	0	0
EU 10b Of which the basic approach (F-BA and R-BA)	1 868 732	1 607 609	149 499
EU 10c Of which the simplified approach	0	0	0
11 Not applicable			
12 Not applicable			
13 Not applicable			
14 Not applicable			
15 Settlement risk	0	0	0
16 Securitisation exposures in the non-trading book (after the cap)	1 767 585	1 725 985	141 407
17 Of which SEC-IRBA approach	0	0	0
18 Of which SEC-ERBA (including IAA)	0	0	0
19 Of which SEC-SA approach	1 767 585	1 725 985	141 407
EU 19a Of which 1250% / deduction	0	0	0
20 Position, foreign exchange and commodities risks (Market risk)	2 784 721	3 543 864	222 778
21 Of which the Alternative standardised approach (A-SA)	0	0	0
EU21a Of which the Simplified standardised approach (S-SA)	2 784 721	3 543 864	222 778
22 Of which the Alternative Internal Models Approach (A-IMA)	0	0	0
EU 22a Large exposures	0	0	0
23 Reclassifications between trading and non-trading books	0	0	0
24 Operational risk	21 883 805	21 883 805	1 750 704
EU 24a Exposures to crypto-assets	0	0	0
25 Amounts below the thresholds for deduction (subject to 250% risk weight)	5 191 678	5 211 552	415 334
26 Output floor applied (%)	0	0	
27 Floor adjustment (before application of transitional cap)	0	0	
28 Floor adjustment (after application of transitional cap)	0	0	
29 Total	132 664 295	148 884 973	10 613 144

As at 31 December 2025, the largest item in the total capital requirement of Santander Bank Polska S.A. Group was the capital requirement for credit risk in the amount of PLN **8 014 164k**, which accounted for 75.5% of the total capital requirement. The Santander Bank Polska S.A. Group manages credit risk as the most significant risk in its operations, using internal rating systems, credit concentration limits and industry limits, striving to maintain the best possible quality of its loan portfolio.

The Santander Bank Polska S.A. uses contractual netting according to art. 295-298 of CRR.

2. Credit risk

The structure of the exposure

In the capital adequacy assessment process, Santander Bank Polska S.A. Group classified each of these exposures in accordance with the standardised approach as provided for in Article 112 CRR. The tables below present details of exposures in accordance with (UE) 2024/3172 Regulation.

Pursuant to Article 1 of Commission Delegated Regulation (EU) No 183/2014 of 20 December 2013 (supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms with regard to regulatory technical standards for specifying the methodology for calculating specific and general credit risk adjustments) in its capital adequacy calculation, Santander Bank Polska S.A. Group includes amounts of adjustments for general and specific credit risk by which Tier I capital has been reduced in order to reflect losses related exclusively to credit risk in accordance with applicable accounting standards and recognised as such in the profit and loss account, regardless of whether they result from impairment, value adjustments or provisions for off-balance sheet items.

K_21.01 - EU CR1: PERFORMING AND NON-PERFORMING EXPOSURES AND RELATED PROVISIONS AS AT 31 DECEMBER 2025 (PLN K)

	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Collateral and financial guarantees received			
	Performing exposures		Non-performing exposures				Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Accumulated partial write-off	On performing exposures	On non-performing exposures	
	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3								
005 Cash balances at central banks and other demand deposits	13 547 813	13 547 813	0	0	0	0	0	0	0	0	0	0	0	0	0	0
010 Loans and advances	177 067 599	158 918 324	18 026 386	6 134 189	0	5 620 766	-1 202 123	-301 674	-898 712	-2 937 277	0	-2 839 111	-1 128 635	120 342 206	2 178 485	
020 Central banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
030 General governments	2 143 594	2 140 673	2 921	5	0	5	-2 762	-2 749	-13	-4	0	-4	0	4 333	0	
040 Credit institutions	15 337 016	15 337 016	0	0	0	0	-601	-601	0	0	0	0	0	14 152 259	0	
050 Other financial corporations	7 075 549	7 004 550	70 994	29 838	0	27 928	-20 627	-17 184	-3 443	-19 429	0	-19 267	-9 526	3 308 346	9 443	
060 Non-financial corporations	71 310 027	63 952 206	7 354 323	3 801 827	0	3 383 362	-569 914	-162 698	-407 162	-1 699 371	0	-1 641 692	-710 873	46 425 843	1 573 721	
070 Of which SMEs	51 438 480	45 814 523	5 620 459	3 298 139	0	2 994 515	-509 818	-135 470	-374 293	-1 669 430	0	-1 613 062	-709 962	36 929 973	1 530 743	
080 Households	81 201 412	70 483 878	10 598 148	2 302 519	0	2 209 471	-608 220	-118 442	-488 094	-1 218 473	0	-1 178 148	-408 235	56 451 425	595 321	
090 Debt securities	84 879 319	84 879 319	0	27 270	0	27 270	0	0	0	-26 876	0	-26 876	0	0	0	
100 Central banks	5 995 633	5 995 633	0	0	0	0	0	0	0	0	0	0	0	0	0	
110 General governments	67 503 401	67 503 401	0	0	0	0	0	0	0	0	0	0	0	0	0	
120 Credit institutions	10 796 860	10 796 860	0	0	0	0	0	0	0	0	0	0	0	0	0	
130 Other financial corporations	583 426	583 426	0	0	0	0	0	0	0	0	0	0	0	0	0	
140 Non-financial corporations	0	0	0	27 270	0	27 270	0	0	0	-26 876	0	-26 876	0	0	0	
150 Off-balance-sheet exposures	78 679 496	76 602 593	2 070 078	110 221	0	66 202	55 066	38 527	16 512	24 263	0	13 267		6 795 498	3 030	
160 Central banks	0	0	0	0	0	0	0	0	0	0	0	0		0	0	
170 General governments	5 185 258	5 185 258	0	0	0	0	117	117	0	0	0	0		13 728	0	
180 Credit institutions	9 540 636	9 540 636	0	0	0	0	479	479	0	0	0	0		3 136 027	0	
190 Other financial corporations	5 867 483	5 831 310	36 173	0	0	0	5 018	4 910	107	0	0	0		1 828 263	0	
200 Non-financial corporations	51 867 433	50 322 522	1 539 842	102 065	0	60 592	43 290	30 344	12 934	24 259	0	13 263		1 817 078	3 030	
210 Households	6 218 687	5 722 868	494 062	8 156	0	5 611	6 163	2 677	3 471	4	0	4		401	0	
220 Total	354 174 228	333 948 049	20 096 464	6 271 681	0	5 714 239	-1 257 189	-340 201	-915 224	-2 988 417	0	-2 879 255	-1 128 635	127 137 704	2 181 515	

As at 31 December 2025, the gross carrying amount of NPLs calculated in accordance with Regulation (EU) 2024/3172 was 3.35%.

K_21.02 - EU CR1-A: MATURITY OF EXPOSURES AS AT 31 DECEMBER 2025 (PLN K)

	Net exposure value					Total
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	
1 Loans and advances	27 602 242	35 047 365	90 854 160	75 755 007	-	229 258 774
2 Debt securities	217 747	15 881 649	21 687 423	2 963 464	-	40 750 283
3 Total	27 819 988	50 929 014	112 541 583	78 718 471	-	270 009 057

K_80.00 - EU CQ1: CREDIT QUALITY OF FORBORNE EXPOSURES AS AT 31 DECEMBER 2025 (PLN K)

	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures		
	Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures			
		Of which defaulted	Of which impaired						
005 Cash balances at central banks and other demand deposits	0	0	0	0	0	0	0	0	0
010 Loans and advances	2 203 450	1 859 121	1 859 121	1 859 121	-116 918	-647 326	2 249 754		665 272
020 Central banks	0	0	0	0	0	0	0		0
030 General governments	0	0	0	0	0	0	0		0
040 Credit institutions	0	0	0	0	0	0	0		0
050 Other financial corporations	24 417	4 469	4 469	4 469	-1 097	-3 535	24 037		835
060 Non-financial corporations	1 237 839	1 382 295	1 382 295	1 382 295	-88 696	-435 878	1 304 888		484 494
070 Households	941 194	472 356	472 356	472 356	-27 125	-207 913	920 829		179 944
080 Debt Securities	0	0	0	0	0	0	0		0
090 Loan commitments given	51 180	27 185	27 185	27 185	931	10 600	0		0
100 Total	2 254 630	1 886 306	1 886 306	1 886 306	-117 849	-657 926	2 249 754		665 272

K_82.00 - EU CQ3: CREDIT QUALITY OF PERFORMING AND NON-PERFORMING EXPOSURES BY PAST DUE DAYS AS AT 31 DECEMBER 2025 (PLN K)

	Gross carrying amount/nominal amount											
	Performing exposures		Non-performing exposures									Of which defaulted
	Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years			
005 Cash balances at central banks and other demand deposits	13 547 813	13 547 813	0	0	0	0	0	0	0	0	0	0
010 Loans and advances	177 067 599	176 400 697	666 902	6 134 189	2 287 163	775 570	651 264	1 216 868	721 362	248 315	233 647	6 134 189
020 Central banks	0	0	0	0	0	0	0	0	0	0	0	0
030 General governments	2 143 594	2 143 593	1	5	0	0	0	4	1	0	0	5
040 Credit institutions	15 337 016	15 337 016	0	0	0	0	0	0	0	0	0	0
050 Other financial corporations	7 075 549	7 074 654	896	29 838	17 224	2 425	1 864	2 269	4 438	1 205	413	29 838
060 Non-financial corporations	71 310 027	71 127 471	182 556	3 801 827	1 391 592	504 186	274 652	828 086	414 588	200 924	187 800	3 801 827
070 Of which SMEs	51 438 480	51 261 656	176 824	3 298 139	1 177 096	504 007	274 585	560 813	406 747	187 105	187 785	3 298 139
080 Households	81 201 412	80 717 963	483 449	2 302 519	878 347	268 960	374 748	386 509	302 335	46 186	45 434	2 302 519
090 Debt securities	84 879 319	84 879 319	0	27 270	0	0	0	0	0	27 270	0	27 270
100 Central banks	5 995 633	5 995 633	0	0	0	0	0	0	0	0	0	0
110 General governments	67 503 401	67 503 401	0	0	0	0	0	0	0	0	0	0
120 Credit institutions	10 796 860	10 796 860	0	0	0	0	0	0	0	0	0	0
130 Other financial corporations	583 426	583 426	0	0	0	0	0	0	0	0	0	0
140 Non-financial corporations	0	0	0	27 270	0	0	0	0	0	27 270	0	27 270
150 Off-balance-sheet exposures	78 679 496			110 221								110 221
160 Central banks	0			0								0
170 General governments	5 185 258			0								0
180 Credit institutions	9 540 636			0								0
190 Other financial corporations	5 867 483			0								0
200 Non-financial corporations	51 867 433			102 065								102 065
210 Households	6 218 687			8 156								8 156
220 Total	354 174 228	274 827 830	666 902	6 271 681	2 287 163	775 570	651 264	1 216 868	721 362	275 585	233 647	6 271 681

K_83.01 - EU CQ4: QUALITY OF NON-PERFORMING EXPOSURES BY GEOGRAPHY AS AT 31 DECEMBER 2025 (PLN K)

010	On-balance-sheet exposures	Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing			Of which subject to impairment			
			Of which defaulted					
		281 656 191	6 161 459	6 161 459	281 656 190	-4 166 276	0	
MX	25 895	3	3	25 895	-114	0		
GB	796 613	4 656	4 656	796 613	-4 240	0		
ZW	59	4	4	59	-4	0		
JE	0	0	0	0	0	0		
TR	437	40	40	437	-32	0		
NP	125	28	28	125	-19	0		
ZA	4	0	0	4	0	0		
MD	343	76	76	343	-52	0		
TH	31	0	0	31	0	0		
SK	309	22	22	309	-17	0		
BR	17	0	0	17	0	0		
KH	0	0	0	0	0	0		
CH	14 487	1 679	1 679	14 487	-321	0		
LT	100	24	24	100	-14	0		
VE	17	0	0	17	0	0		
CY	262	47	47	262	-29	0		
GR	50	1	1	50	-1	0		
IT	434	7	7	434	-7	0		
DE	241 294	763	763	241 294	-594	0		
AE	147	0	0	147	-1	0		
CN	470	9	9	470	-7	0		
FI	85 575	1	1	85 575	-32	0		
PT	5 167	3	3	5 167	-10	0		
ES	1 249 832	130	130	1 249 832	-270	0		
KR	27	1	1	27	-1	0		
IS	18	0	0	18	0	0		
CA	1 829	18	18	1 829	-11	0		
CZ	148 401	25	25	148 401	-1 166	0		
UA	5 138	1 265	1 265	5 138	-687	0		
HU	8 214	4	4	8 214	-3	0		
MC	0	0	0	0	0	0		
BY	175	56	56	175	-36	0		
RO	7 638	16	16	7 638	-11	0		
BG	20	4	4	20	-3	0		
NZ	13	0	0	13	0	0		
AU	22 447	2	2	22 447	-2	0		
IN	193	40	40	193	-29	0		
SI	1	0	0	1	0	0		
HK	9 299	0	0	9 299	0	0		
DK	172 436	5	5	172 436	-3	0		
PA	5	0	0	5	0	0		
SG	348	1	1	348	-1	0		
BE	40 654	264	264	40 654	-162	0		
GI	492	1	1	492	0	0		
FR	10 923 586	83	83	10 923 586	-61	0		
AR	123	1	1	123	0	0		
SA	5	1	1	5	-1	0		
US	47 400	96	96	47 400	-71	0		
DZ	8	0	0	8	0	0		
NO	5 397	103	103	5 397	-43	0		
LU	8 366 538	12	12	8 366 538	-3 327	0		
PL	257 277 125	6 148 135	6 148 135	257 277 125	-4 149 795	0		
QA	43	0	0	43	-2	0		
IE	392 937	794	794	392 937	-264	0		
NL	1 140 651	440	440	1 140 651	-790	0		
IL	28	2	2	28	-2	0		
AT	241 607	2	2	241 607	-1 115	0		
PE	4	0	0	4	0	0		
MT	391 236	222	222	391 236	-652	0		
SE	4 392	748	748	4 392	-739	0		
NG	9	1	1	9	-1	0		
JO	5	1	1	5	0	0		
BI	3	0	0	3	0	0		
BB	0	0	0	0	0	0		
MW	0	0	0	0	0	0		
DO	1	1	1	1	0	0		
BJ	1	1	1	1	-1	0		
EC	2	0	0	2	0	0		
CG	3	1	1	3	-1	0		
HR	0	0	0	0	0	0		
LK	8	1	1	8	-1	0		
KE	4	0	0	4	0	0		
SR	0	0	0	0	0	0		
AO	0	0	0	0	0	0		
BO	1	0	0	1	0	0		
MA	13	4	4	13	-2	0		

IV. CAPITAL REQUIREMENTS

LC	0	0	0	0	0	0
SO	1	0	0	1	0	0
PS	1	1	1	1	0	0
KG	38	3	3	38	-3	0
KP	0	0	0	0	0	0
EE	39	33	33	39	-21	0
MV	0	0	0	0	0	0
ML	0	0	0	0	0	0
KN	0	0	0	0	0	0
BW	0	0	0	0	0	0
CU	2	0	0	2	0	0
HT	0	0	0	0	0	0
KW	0	0	0	0	0	0
RW	20	1	1	20	-1	0
MK	10	0	0	10	0	0
PR	0	0	0	0	0	0
TW	19	5	5	19	-3	0
GT	16	1	1	16	-1	0
TL	0	0	0	0	0	0
NE	0	0	0	0	0	0
EG	10	1	1	10	-1	0
YT	0	0	0	0	0	0
CI	0	0	0	0	0	0
GS	6	3	3	6	-2	0
RE	0	0	0	0	0	0
FJ	0	0	0	0	0	0
GW	0	0	0	0	0	0
PK	47	38	38	47	-22	0
ID	55	8	8	55	-6	0
AD	0	0	0	0	0	0
MM	0	0	0	0	0	0
MU	3	0	0	3	0	0
LI	1 307	1 306	1 306	1 307	-1 293	0
TJ	19	2	2	19	-2	0
UY	0	0	0	0	0	0
JM	0	0	0	0	0	0
YE	0	0	0	0	0	0
KM	0	0	0	0	0	0
AL	17	2	2	17	-1	0
SC	0	0	0	0	0	0
CL	0	0	0	0	0	0
LB	1	0	0	1	0	0
TZ	1	0	0	1	0	0
GG	0	0	0	0	0	0
TM	29	0	0	29	-1	0
CD	0	0	0	0	0	0
AG	0	0	0	0	0	0
PF	0	0	0	0	0	0
BH	0	0	0	0	0	0
MO	0	0	0	0	0	0
AF	0	0	0	0	0	0
PY	0	0	0	0	0	0
LV	25	12	12	25	-7	0
BD	35	8	8	35	-5	0
GM	1	0	0	1	0	0
TC	0	0	0	0	0	0
IO	0	0	0	0	0	0
OM	2	0	0	2	0	0
KZ	64	11	11	64	-8	0
CM	1	0	0	1	0	0
UG	2	0	0	2	0	0
VG	0	0	0	0	0	0
LY	1	0	0	1	0	0
KY	0	0	0	0	0	0
ER	0	0	0	0	0	0
GN	0	0	0	0	0	0
ET	57	8	8	57	-6	0
AZ	68	7	7	68	-6	0
LA	0	0	0	0	0	0
DM	0	0	0	0	0	0
IR	0	0	0	0	0	0
SD	0	0	0	0	0	0
GH	5	1	1	5	-1	0
ME	2	1	1	2	0	0
UZ	140	26	26	140	-19	0
SZ	0	0	0	0	0	0
BA	1	0	0	1	0	0
SH	0	0	0	0	0	0
RS	35	2	2	35	-2	0
BZ	0	0	0	0	0	0
BT	1	1	1	1	-1	0
CO	89	9	9	89	-9	0
MH	0	0	0	0	0	0

IV. CAPITAL REQUIREMENTS

NI	1	0	0	1	0	0
SL	1	0	0	1	0	0
SN	0	0	0	0	0	0
NU	0	0	0	0	0	0
TD	0	0	0	0	0	0
AM	14	1	1	14	-1	0
TG	0	0	0	0	0	0
GQ	0	0	0	0	0	0
PH	15	0	0	15	-1	0
SY	0	0	0	0	0	0
MY	4	2	2	4	-1	0
LS	0	0	0	0	0	0
JP	23 301	1	1	23 301	-1	0
HN	1	0	0	1	0	0
SV	0	0	0	0	0	0
MG	0	0	0	0	0	0
TN	3	0	0	3	0	0
IQ	8	2	2	8	-1	0
NA	0	0	0	0	0	0
AS	0	0	0	0	0	0
GE	457	81	81	457	-57	0
MN	5	0	0	5	0	0
ZM	1	0	0	1	0	0
CF	0	0	0	0	0	0
VN	3	0	0	3	0	0
CR	0	0	0	0	0	0
FO	0	0	0	0	0	0
BS	0	0	0	0	0	0
RU	16	1	1	16	-1	0
MZ	1	0	0	1	0	0
VI	0	0	0	0	0	0
AI	36	36	36	36	-36	0
BF	0	0	0	0	0	0
CV	0	0	0	0	0	0
DJ	0	0	0	0	0	0
GA	0	0	0	0	0	0
IM	0	0	0	0	0	0
PG	0	0	0	0	0	0
TT	0	0	0	0	0	0
080 Off-balance-sheet exposures	78 789 717	110 221	110 221		79 330	
MX	0	0	0		0	
GB	133 418	1	1		9	
ZW	4	0	0		0	
JE	8	0	0		0	
TR	313 057	0	0		45	
NP	0	0	0		0	
ZA	5	0	0		0	
MD	0	0	0		0	
TH	8	0	0		0	
SK	1 853	0	0		1	
BR	44	0	0		0	
KH	6	0	0		0	
CH	6 566	6	6		1	
LT	10 020	0	0		2	
VE	4	0	0		0	
CY	136	0	0		0	
GR	91	0	0		0	
IT	10 715	0	0		2	
DE	1 132 524	32	32		48	
AE	253	0	0		0	
CN	5 716	0	0		0	
FI	2	0	0		0	
PT	12 893	0	0		1	
ES	274 905	0	0		25	
KR	2 597 683	0	0		200	
IS	12	0	0		0	
CA	15	0	0		1	
CZ	91 616	0	0		53	
UA	119	0	0		0	
HU	425 137	0	0		621	
MC	60	0	0		0	
BY	7	0	0		0	
RO	3	0	0		0	
BG	25	0	0		0	
NZ	18	0	0		0	
AU	15	0	0		0	
IN	27	0	0		0	
SI	10 022	0	0		7	
HK	1 180 531	0	0		79	
DK	42 486	0	0		131	
PA	49	0	0		0	
SG	5	0	0		0	
BE	29 630	0	0		4	

IV. CAPITAL REQUIREMENTS

GI	10	0	0		0
FR	705 800	38	38		0
AR	25	0	0		0
SA	68	0	0		0
US	40 935	0	0		3
DZ	5	0	0		0
NO	24	1	1		0
LU	871 635	0	0		238
PL	70 232 600	110 143	110 143		77 729
QA	95	0	0		2
IE	173	0	0		0
NL	201 813	0	0		61
IL	27	0	0		0
AT	34 538	0	0		42
PE	1 900	0	0		0
MT	118 125	0	0		6
SE	302 259	0	0		17
NG	0	0	0		0
JO	0	0	0		0
BI	0	0	0		0
BB	0	0	0		0
MW	0	0	0		0
DO	0	0	0		0
BJ	0	0	0		0
EC	0	0	0		0
CG	0	0	0		0
HR	0	0	0		0
LK	0	0	0		0
KE	0	0	0		0
SR	0	0	0		0
AO	0	0	0		0
BO	0	0	0		0
MA	0	0	0		0
LC	0	0	0		0
SO	0	0	0		0
PS	0	0	0		0
KG	0	0	0		0
KP	0	0	0		0
EE	0	0	0		0
MV	0	0	0		0
ML	0	0	0		0
KN	0	0	0		0
BW	0	0	0		0
CU	0	0	0		0
HT	0	0	0		0
KW	0	0	0		0
RW	0	0	0		0
MK	0	0	0		0
PR	0	0	0		0
TW	0	0	0		0
GT	0	0	0		0
TL	0	0	0		0
NE	0	0	0		0
EG	0	0	0		0
YT	0	0	0		0
CI	0	0	0		0
GS	0	0	0		0
RE	0	0	0		0
FJ	0	0	0		0
GW	0	0	0		0
PK	0	0	0		0
ID	0	0	0		0
AD	0	0	0		0
MM	0	0	0		0
MU	0	0	0		0
LI	0	0	0		0
TJ	0	0	0		0
UY	0	0	0		0
JM	0	0	0		0
YE	0	0	0		0
KM	0	0	0		0
AL	0	0	0		0
SC	0	0	0		0
CL	0	0	0		0
LB	0	0	0		0
TZ	0	0	0		0
GG	0	0	0		0
TM	0	0	0		0
CD	0	0	0		0
AG	0	0	0		0
PF	0	0	0		0
BH	0	0	0		0
MO	0	0	0		0

IV. CAPITAL REQUIREMENTS

AF	0	0	0		0		
PY	0	0	0		0		
LV	0	0	0		0		
BD	0	0	0		0		
GM	0	0	0		0		
TC	0	0	0		0		
IO	0	0	0		0		
OM	0	0	0		0		
KZ	0	0	0		0		
CM	0	0	0		0		
UG	0	0	0		0		
VG	0	0	0		0		
LY	0	0	0		0		
KY	0	0	0		0		
ER	0	0	0		0		
GN	0	0	0		0		
ET	0	0	0		0		
AZ	0	0	0		0		
LA	0	0	0		0		
DM	0	0	0		0		
IR	0	0	0		0		
SD	0	0	0		0		
GH	0	0	0		0		
ME	0	0	0		0		
UZ	0	0	0		0		
SZ	0	0	0		0		
BA	0	0	0		0		
SH	0	0	0		0		
RS	0	0	0		0		
BZ	0	0	0		0		
BT	0	0	0		0		
CO	0	0	0		0		
MH	0	0	0		0		
NI	0	0	0		0		
SL	0	0	0		0		
SN	0	0	0		0		
NU	0	0	0		0		
TD	0	0	0		0		
AM	0	0	0		0		
TG	0	0	0		0		
GQ	0	0	0		0		
PH	0	0	0		0		
SY	0	0	0		0		
MY	0	0	0		0		
LS	0	0	0		0		
JP	0	0	0		0		
HN	0	0	0		0		
SV	0	0	0		0		
MG	0	0	0		0		
TN	0	0	0		0		
IQ	0	0	0		0		
NA	0	0	0		0		
AS	0	0	0		0		
GE	0	0	0		0		
MN	0	0	0		0		
ZM	0	0	0		0		
CF	0	0	0		0		
VN	0	0	0		0		
CR	0	0	0		0		
FO	0	0	0		0		
BS	0	0	0		0		
RU	0	0	0		0		
MZ	0	0	0		0		
VI	0	0	0		0		
AI	0	0	0		0		
BF	0	0	0		0		
CV	0	0	0		0		
DJ	0	0	0		0		
GA	0	0	0		0		
IM	0	0	0		0		
PG	0	0	0		0		
TT	0	0	0		0		
150 Total	360 445 908	6 271 681	6 271 681	281 656 190	-4 166 276	79 330	0

K_84.01 - EU CQ5: CREDIT QUALITY OF LOANS AND ADVANCES TO NON-FINANCIAL CORPORATIONS BY INDUSTRY, AS AT 31 DECEMBER 2025 (PLN K)

	Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing		Of which loans and advances subject to impairment			
		Of which defaulted				
010 Agriculture, forestry and fishing	797 331	31 766	31 766	797 331	-14 569	0
020 Mining and quarrying	1 634 833	1 268	1 268	1 634 833	-1 637	0
030 Manufacturing	16 038 774	1 628 583	1 628 583	16 038 774	-621 842	0
040 Electricity, gas, steam and air conditioning supply	2 967 422	7 532	7 532	2 967 422	-45 457	0
050 Water supply	678 224	11 699	11 699	678 224	-11 120	0
060 Construction	3 657 004	216 188	216 188	3 657 004	-169 366	0
070 Wholesale and retail trade	14 774 434	776 651	776 651	14 774 434	-501 480	0
080 Transport and storage	4 565 504	242 701	242 701	4 565 504	-164 963	0
090 Accommodation and food service activities	2 380 339	190 075	190 075	2 380 339	-120 862	0
100 Information and communication	3 481 981	34 503	34 503	3 481 981	-60 465	0
110 Financial and insurance activities	304 809	137	137	304 809	-1 166	0
120 Real estate activities	11 822 799	400 996	400 996	11 822 799	-193 659	0
130 Professional, scientific and technical activities	5 503 898	111 503	111 503	5 503 898	-131 033	0
140 Administrative and support service activities	3 645 842	65 482	65 482	3 645 842	-51 012	0
150 Public administration and defense, compulsory social security	4 236	4	4	4 236	-79	0
160 Education	330 279	6 797	6 797	330 279	-7 838	0
170 Human health services and social work activities	1 373 255	33 884	33 884	1 373 255	-37 130	0
180 Arts, entertainment and recreation	653 435	9 856	9 856	653 435	-11 338	0
190 Other services	497 455	32 203	32 203	497 455	-124 270	0
200 Total	75 111 854	3 801 827	3 801 827	75 111 854	-2 269 285	0

As at 31 December 2025, Santander Bank Polska S.A. Capital Group does not identify any exposures to entities from the shadow banking system or exposures related to crypto-assets. Therefore, the Group does not disclose EU-SB1 and EU-CAE templates.

Overdue and impaired items

An exposure is considered as overdue if the obligor is in arrears with capital and/or interest payments. In such circumstances, the entire exposure is considered as delinquent, regardless of whether or not the payment delay relates to the whole exposure or a part thereof.

An exposure is considered as impaired, if the Group has objective evidence that it will not be able to recover the exposure in accordance with the underlying credit agreement.

Santander Bank Polska S.A. Group posts impairment allowances in accordance with International Financial Reporting Standard 9 Financial instruments (IFRS 9).

The IFRS 9 approach is based on estimation of the expected credit loss (ECL). ECL allowances reflect an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes, the time value of money; and reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions. ECL allowances are measured at an amount equal to a 12-month ECL or the lifetime ECL, when it is deemed there has been a significant increase in credit risk since initial recognition (stage 2) or impairment (stage 3). Accordingly, the ECL model gives rise to measurement uncertainty, especially in relation to:

- Measurement of a 12-month ECL or the lifetime ECL;
- Determination of when a significant increase in credit risk occurred;
- Determination of any forward-looking events reflected in ECL estimation, and their likelihood.

In accordance with IFRS 9, the recognition of expected credit losses depends on changes in credit risk level which occur after initial recognition of the exposure. The standard defines three main stages for recognising expected credit losses:

- Stage 1 – exposures with no significant increase in credit risk since initial recognition, i.e. the likelihood of the exposure being downgraded to the impaired portfolio (stage 3 exposures) has not increased. For such exposures, 12-month expected credit losses is recognised;

- Stage 2 – exposures with a significant increase in credit risk since initial recognition, but with no objective evidence of impairment. For such exposures, lifetime expected credit losses is recognised;
- Stage 3 – exposures for which the risk of default has materialised (objective evidence of impairment has been identified). For such exposures, lifetime expected credit losses is recognised.

Lifetime expected losses are recognised also for the exposures classified as POCL (purchased or originated credit-impaired).

In the case of classification into stage 3, the Group applies objective indications of impairment, as defined in accordance with the Basel Committee's recommendations and Recommendation R.

The Group estimates ECL using both an individual approach (for individually significant exposures with objectively evidenced impairment [stage 3]) and collective approach (individually insignificant exposures with objectively evidenced impairment, and incurred but not reported losses).

The Group on a periodically basis recalibrates its models and updates the forward-looking information used for estimating ECL, taking into account the impact of changes in economic conditions, modifications of the Group's credit policies and recovery strategies, which is designed to ensure appropriate level of impairment allowances.

Exposures which are overdue by more than 90 days, but which are not treated as impaired, have a negligible share in the total volume. These are mainly cases where the amount above which an exposure is classified into NPLs has not been exceeded. Under the current Credit Classification Policy, such exposures are classified in stage 2.

The Group applies debt forbearance defined as a repayment concession for customers experiencing financial difficulties or customers who will have problems servicing their debts owed to Santander Bank Polska S.A. Group on the original terms and conditions. The concession may involve a modification of the previous terms and conditions of a debt contract or its total or partial refinancing. The purpose of debt restructuring is to better align repayment terms with the current and projected financial standing of the customer, minimise default risk and/or maximise recovery.

Restructuring does not refer to a technical or operational modification of contractual terms, or changes attributable to other factors than payment difficulties (business or market conditions).

Detailed disclosures regarding credit risk are included in Note 4 *Risk management* of Consolidated Financial Statements of Santander Bank Polska S.A. Group for 2025.

The Santander Bank Polska S.A. Capital Group does not present information on collateral obtained through acquisitions and enforcement proceedings (EU CQ7, EU CQ8) due to the lack of such collateral. Tables EU-CR2, EU-CR2a, EU-CQ2 are not disclosed due to the non-performing loan ratio being below 5%.

Credit risk mitigation

The Santander Bank Polska S.A. Group uses credit risk mitigation techniques for both funded and unfunded protection.

The case of non-real credit protection, borrowers covered by credit protection in the form of guarantees receive a risk weight resulting from the risk group of the entity granting the guarantee. The dominant group of providers of non-real credit protection are banks, including Bank Gospodarstwa Krajowego and the Ministry of Finance as a State Treasury entity.

As at 31 December 2025, the Group's debt instruments portfolio included PLN **4 024 540k** worth of bonds of Bank Gospodarstwa Krajowego and PLN **583 426k** worth of bonds of Polski Fundusz Rozwoju (PFR), which were fully guaranteed by the State Treasury. In the case of debt issued in the domestic currency, a risk weight of 0% was assigned, while the remaining ones in EUR were assigned a risk weight of 4%.

In the case of funded credit protection, Santander Bank Polska S.A. Group recognizes exposures secured by financial collateral.

K_23.00 - EU CR3 – CRM TECHNIQUES OVERVIEW: DISCLOSURE OF THE USE OF CREDIT RISK MITIGATION TECHNIQUES AS AT 31 DECEMBER 2025 (PLN K)

	Secured carrying amount				
	Unsecured carrying amount	Of which secured by collateral			Of which secured by financial guarantees
		a	b	c	d
1 Loans and advances	70 089 511	122 520 691	107 983 544	14 537 147	0
2 Debt securities	84 879 714	0	0	0	
3 Total	154 969 224	122 520 691	107 983 544	14 537 147	0
4 Of which non-performing exposures	1 018 821	2 178 485	1 794 963	383 522	0
EU-5 Of which defaulted	1 018 821	2 178 485			

K_24.00 - EU CR4 – STANDARDISED APPROACH – CREDIT RISK EXPOSURE AND CRM EFFECTS AS AT 31 DECEMBER 2025 (PLN K)

Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
	a	b	c	d	e	f
1 Central governments or central banks	86 057 546	0	97 057 751	2 238 920	1 858 123	1,87%
2 Non-central government public sector entities	2 169 943	364 664	2 265 093	32 813	495 292	21,55%
EU 2a Regional government or local authorities	1 973 180	128 715	2 163 782	15 086	435 774	20,00%
EU 2b Public sector entities	196 763	235 949	101 311	17 726	59 519	50,00%
3 Multilateral development banks	6 772 319	0	10 877 111	0	0	0,00%
EU 3a International organisations	0	0	0	0	0	0,00%
4 Institutions	8 674 904	10 383 324	9 203 159	770 838	3 653 307	36,63%
5 Covered bonds	0	0	0	0	0	0,00%
6 Corporates	30 357 699	46 037 383	21 913 833	3 104 376	23 148 545	92,53%
6.1 Of which: Specialised Lending	2 101 735	906 700	2 101 735	35 757	1 716 266	80,29%
7 Subordinated debt exposures and equity	1 477 704	0	1 477 704	0	3 694 259	250,00%
EU 7a Subordinated debt exposures	0	0	0	0	0	0,00%
EU 7b Equity	1 477 704	0	1 477 704	0	3 694 259	250,00%
8 Retail	23 344 989	11 425 395	21 604 657	2 501 295	16 043 292	66,55%
9 Secured by mortgages on immovable property and ADC exposures	85 154 539	7 495 777	82 787 825	1 545 904	42 970 397	50,95%
9.1 Secured by mortgages on residential immovable property - non IPRE	57 611 029	280 656	56 973 744	70 320	21 656 677	37,96%
9.2 Secured by mortgages on residential immovable property - IPRE	964 181	20 693	964 181	8 277	524 852	53,97%
9.3 Secured by mortgages on commercial immovable property - non IPRE	15 870 634	5 024 804	14 261 776	974 685	10 889 727	71,47%
9.4 Secured by mortgages on commercial immovable property - IPRE	8 330 361	404 429	8 267 539	65 008	5 776 840	69,33%
9.5 Acquisition, Development and Construction (ADC)	2 378 335	1 765 195	2 320 586	427 614	4 122 300	150,00%
10 Exposures in default	2 885 827	83 860	2 591 210	31 281	3 099 175	118,18%
EU 10a Claims on institutions and corporates with a short-term credit assessment	0	0	0	0	0	0,00%
EU 10b Collective investment undertakings	0	0	0	0	0	0,00%
EU 10c Other items	6 865 823	0	6 865 823	0	5 214 658	75,95%
11 Not applicable						
12 TOTAL	253 761 292	75 790 403	256 644 166	10 225 426	100 177 048	37,54%

Allocating risk weights to the credit portfolio

The risk weights used in the calculation of capital requirement for credit risk in the standardised approach are based on the provision of Chapter 2, Title II, Part III of the CRR. Risk weights are allocated in line with the category of the exposure and the credit quality of the exposure or entity.

Defaulted exposures have their risk weight allocated in accordance with the rules laid down in Article 127 of the CRR.

Pursuant to Article 125(2) of the CRR, Santander Bank Polska S.A. Group additionally assigns a preferential risk weight of 20% to a part of an exposure which is fully and completely secured by a mortgage on a residential property and whose value does not exceed 55% of the value of the property in question calculated according to Article 229(1) CRR. Pursuant to Article 126 CRR a risk weight of 60% is applied to a part of exposure which is fully and completely secured by a mortgage on a commercial property. Santander Bank Polska S.A. Group identifies income producing real estate exposures ("IPRE") and land acquisition, development and construction exposures ("ADC"). For IPRE exposures secured by a residential property a preferential risk weight is assigned according to the derogation specified in Article 125(3) CRR. For IPRE exposures secured by commercial real estate the risk weight is assigned according to Article 125(2) CRR. For exposures that meet the requirements set out in Article 123 CRR Santander Bank Polska S.A. Group applies the factor of 1.5 to an exposure's risk weight. Santander Bank Polska S.A. Group identifies project finance exposures to which risk weights are assigned as set out in Article 122a CRR.

In each asset class, appropriate risk weight is allocated depending on the available credit rating of external rating institutions or export credit agencies. The Santander Bank Polska S.A. Group accepts ratings of the following agencies:

- Fitch Ratings;
- Moody's Investors Service;

IV. CAPITAL REQUIREMENTS

- Standard and Poor's Ratings Services.

If two credit ratings are available for an exposure and the ratings are linked to different risk weight of the particular exposure, the Santander Bank Polska S.A. Group S.A. uses the higher risk weight. If for an exposure three or more credit ratings are available, the Bank uses two ratings with the lowest risk weights and if the two are different, the higher risk weight is applied.

For exposures to institutions for which no credit assessment by a nominated ECAI is available the risk weight is assigned according to Article 121 CRR.

K_25.00 - EU CR5 – STANDARDISED APPROACH AS AT 31 DECEMBER 2025 (PLN K)

Exposure classes	Risk weight																				Total	Of which unrated						
	0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%			250%	370%	400%	1250%	Others	
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	
1 Central governments or central banks	96 025 849	0	2 032 509	0	571 521	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	99 296 871	98 988 503
2 Non-central government or public sector entities	0	0	0	0	2 178 869	0	0	0	0	119 037	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2 297 906	0
EU24 Regional governments or local authorities	0	0	0	0	2 178 869	0	0	0	0	119 037	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2 178 869	2 178 869
EU26 Public sector entities	0	0	0	0	0	0	0	0	0	119 037	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	119 037	119 037
3 Multilateral development banks	10 877 111	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10 877 111	10 877 111
EU3a International organisations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4 Institutions	0	146 763	0	0	791 217	7 748 072	0	500 065	0	182 710	0	0	0	0	0	0	62 702	0	0	0	542 468	0	0	0	0	0	9 973 997	5 471 774
5 Covered bonds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6 Corporate	0	0	0	0	50 777	0	0	0	0	194 767	0	0	532 241	0	23 560 030	0	0	680 393	0	0	0	0	0	0	0	0	25 018 209	26 018 524
6.1 Of which: Specialist lending	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1 457 099	0	0	680 393	0	0	0	0	0	0	0	0	2 137 492	2 137 492
7 Subordinated debt exposures and equity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1 477 704	0	0	0	0	1 477 704	0
EU7a Subordinated debt exposures	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EU7b Equity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1 477 704	0	0	0	0	1 477 704	0
8 Retail exposures	0	0	0	0	0	0	0	336 329	0	0	23 769 624	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24 105 952	0
9 Secured by mortgages on immovable property and ADC exposures	0	0	0	0	39 007 696	0	0	0	0	7 585 034	6 753 785	19 331 555	0	634 230	7 074 411	0	386 818	0	3 560 211	0	0	0	0	0	0	0	84 333 729	0
9.1 Secured by mortgages on residential immovable property - non IPRE	0	0	0	0	38 356 183	0	0	0	0	0	0	0	0	0	18 556 598	0	131 283	0	0	0	0	0	0	0	0	0	57 044 064	0
9.1.1 No loan splitting applied	0	0	0	0	0	0	0	0	0	0	0	0	0	11 942 397	0	0	127 648	0	0	0	0	0	0	0	0	0	12 070 046	0
9.1.2 loan splitting applied (secured)	0	0	0	0	38 356 183	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	38 356 183	0
9.1.3 loan splitting applied (unsecured)	0	0	0	0	0	0	0	0	0	0	0	0	0	6 614 201	0	0	3 635	0	0	0	0	0	0	0	0	0	6 617 836	0
9.2 Secured by mortgages on residential immovable property - IPRE	0	0	0	0	651 502	0	0	0	0	0	0	0	0	0	0	0	66 658	0	0	0	254 297	0	0	0	0	0	972 458	0
9.3 Secured by mortgages on commercial immovable property - non IPRE	0	0	0	0	0	0	0	0	0	7 585 034	0	774 957	0	0	6 876 470	0	0	0	0	0	0	0	0	0	0	0	15 236 460	0
9.3.1 No loan splitting applied	0	0	0	0	0	0	0	0	0	0	0	537 417	0	0	3 487 656	0	0	0	0	0	0	0	0	0	0	0	4 025 074	0
9.3.2 loan splitting applied (secured)	0	0	0	0	0	0	0	0	0	7 585 034	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7 585 034	0
9.3.3 loan splitting applied (unsecured)	0	0	0	0	0	0	0	0	0	0	237 539	0	0	0	3 388 814	0	0	0	0	0	0	0	0	0	0	0	3 626 353	0
9.4 Secured by mortgages on commercial immovable property - IPRE	0	0	0	0	0	0	0	0	0	0	6 753 785	0	0	634 230	0	0	386 818	0	557 714	0	0	0	0	0	0	0	8 332 547	0
9.5 Acquisition, Development and Construction (ADC)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2 748 200	0	0	0	0	0	0	0	2 748 200	0
10 Exposures in default	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1 669 122	0	0	0	953 369	0	0	0	0	0	0	0	2 622 491	0
Liabilities on institutions and corporates with a short-term credit	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EU 10a Assessment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EU 10b Collective investment undertakings (CIU)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EU 10c Other items	1 525 594	0	0	0	156 963	0	0	0	0	0	0	0	0	0	5 183 266	0	0	0	0	0	0	0	0	0	0	0	6 865 823	6 865 823
11 not applicable																												
EU 11c TOTAL	#####	146 763	2 032 509	0	42 757 032	7 748 072	0	500 065	336 329	496 515	7 585 034	6 753 785	43 633 420	0	634 230	37 549 531	0	386 818	680 393	5 056 048	2 144 501	0	0	0	0	#####	152 657 151	

Santander Bank Polska S.A. Group does not disclose the K_63.01 - EU CMS1 and K_63.02 - EU CMS2 tables due to the fact that it only calculates credit risk capital requirements under the standard method.

3. Counterparty credit risk

The structure of the exposition

The tables below present detailed information about instruments held in trading and non-trading portfolios in relation to counterparty credit risk (CCR).

Counterparty credit risk is calculated in accordance with the provisions of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 as amended.

Santander Bank Polska S.A. Group uses the standard approach (SA CCR) to calculate the exposures and risk weighted assets for counterparty credit risk.

K_02.00 - EU CCR1 – ANALYSIS OF CCR EXPOSURE BY APPROACH AS AT 31 DECEMBER 2025 (PLN K)

	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1 EU - Original Exposure Method (for derivatives)	0	0		1,4	0	0	0	0
EU-2 EU - Simplified SA-CCR (for derivatives)	0	0		1,4	0	0	0	0
1 SA-CCR (for derivatives)	1 383 018	3 533 223		1,4	6 882 738	6 882 738	6 882 738	3 334 979
2 IMM (for derivatives and SFTs)			0	0	0	0	0	0
2a Of which securities financing transactions netting sets			0		0	0	0	0
2b Of which derivatives and long settlement transactions netting sets			0		0	0	0	0
2c Of which from contractual cross-product netting sets			0		0	0	0	0
3 Financial collateral simple method (for SFTs)					0	0	0	0
4 Financial collateral comprehensive method (for SFTs)					16 489 346	597 572	597 572	167 781
5 VaR for SFTs					0	0	0	0
6 Total					23 372 084	7 480 310	7 480 310	3 502 760

K_03.00 - EU CCR3 – STANDARDISED APPROACH – CCR EXPOSURES BY REGULATORY EXPOSURE CLASS AND RISK WEIGHTS AS AT 31 DECEMBER 2025 (PLN K)

Exposure classes	Risk weight											Total exposure value
	a	b	c	d	e	f	g	h	i	j	k	
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1 Central governments or central banks	43 487	0	0	0	585 184	0	0	0	0	0	0	628 671
2 Regional government or local authorities	0	0	0	0	0	0	0	0	0	0	0	0
3 Public sector entities	0	0	0	0	0	0	0	0	0	0	0	0
4 Multilateral development banks	0	0	0	0	0	0	0	0	0	0	0	0
5 International organisations	0	0	0	0	0	0	0	0	0	0	0	0
6 Institutions	0	3 371 702	0	0	790 528	3 840	0	0	0	0	5 773 545	9 939 616
7 Corporates	0	0	0	0	5 237	112 750	0	343 012	1 815 930	0	39 022	2 315 951
8 Retail	0	0	0	0	0	0	0	0	0	0	0	0
9 Institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0	0	0	0	0	0
10 Other items	0	0	0	0	0	0	0	0	0	468	0	468
11 Total exposure value	43 487	3 371 702	0	0	1 380 949	116 590	0	343 012	1 815 930	468	5 812 567	12 884 706

K_08.00 - EU CCR8 – EXPOSURES TO CCPS AS AT 31 DECEMBER 2025 (PLN K)

	Exposure value	RWEA
1 Exposures to QCCPs (total)		69 838
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	3 371 702	67 434
3 (i) OTC derivatives	3 364 583	67 292
4 (ii) Exchange-traded derivatives	0	0
5 (iii) SFTs	7 120	142
6 (iv) Netting sets where cross-product netting has been approved	0	0
7 Segregated initial margin	0	
8 Non-segregated initial margin	0	0
9 Prefunded default fund contributions	120 185	2 404
10 Unfunded default fund contributions	0	0
11 Exposures to non-QCCPs (total)		609 805
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	2 032 693	609 805
13 (i) OTC derivatives	2 032 693	609 805
14 (ii) Exchange-traded derivatives	0	0
15 (iii) SFTs	0	0
16 (iv) Netting sets where cross-product netting has been approved	0	0
17 Segregated initial margin	0	
18 Non-segregated initial margin	0	0
19 Prefunded default fund contributions	0	0
20 Unfunded default fund contributions	0	0

Counterparty credit risk mitigation

The Santander Bank Polska S.A. uses contractual netting according to art. 295-298 of CRR.

K_05.00 - EU CCR5 – COMPOSITION OF COLLATERAL FOR CCR EXPOSURES AS AT 31 DECEMBER 2025 (PLN K)

Collateral type	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1 Cash – domestic currency	0	1 203 008	72 644	1 912	0	3 410 411	0	3 843 965
2 Cash – other currencies	0	623 693	447 418	553 940	0	0	0	9 828 121
3 Domestic sovereign debt	0	0	0	0	0	3 758 343	0	3 477 189
4 Other sovereign debt	0	156 561	0	0	0	9 423 775	0	0
5 Government agency debt	0	0	0	0	0	0	0	0
6 Corporate bonds	0	5 123	0	308 080	0	0	0	0
7 Equity securities	0	0	0	0	0	0	0	0
8 Other collateral	0	0	0	0	0	0	0	0
9 Total	0	1 988 385	520 063	863 932	0	16 592 529	0	17 149 274

Santander Bank Polska S.A. Group does not disclose the EU-CCR7 table as it has not been presented because the Group uses only the standardised approach to calculate capital requirements for counterparty credit risk.

4. Credit valuation adjustment risk

For the calculation of CVA risk Santander Bank Polska S.A. Group uses the Reduced BA-CVA method as specified in article 384 CRR.

K_18.01 - EU CVA 1 – CREDIT VALUATION ADJUSTMENT RISK UNDER THE REDUCED BASIC APPROACH (R-BA) AS AT 31 DECEMBER 2025 (PLN K)

	Components of Own Funds Requirements	Own Funds Requirements
1 Aggregation of systematic components of CVA risk	187 274	
2 Aggregation of idiosyncratic components of CVA risk	133 520	
3 Total		149 499

Given the use of the above method to calculate capital requirements for CVA, Santander Bank Polska S.A. Group does not present the EU CVA2, EU CVA3 and EU CVA4 tables.

5. Market risk

The table below presents the elements of own funds requirements for market risk under the standardized approach.

K_10.00 - EU MR1 - MARKET RISK UNDER THE STANDARDISED APPROACH AS AT 31 DECEMBER 2025 (PLN K)

	RWEAs
Outright products	
1 Interest rate risk (general and specific)	2 686 869
2 Equity risk (general and specific)	97 852
3 Foreign exchange risk	0
4 Commodity risk	0
Options	
5 Simplified approach	0
6 Delta-plus approach	0
7 Scenario approach	0
8 Securitisation (specific risk)	0
9 Total	2 784 721

As at December 31, 2025 there was no capital requirement in the Bank due to foreign exchange risk.

V. Capital buffers

The Act of 5 August 2015 on macroprudential supervision of the financial system and crisis management in the financial system implemented the provisions of CRD IV, as amended, into Polish law, including in particular the provisions on the maintenance of additional capital buffers by banks.

Moreover, the KNF set the minimum capital ratios for banks. Since 2018, banks should maintain Tier 1 capital ratios at the minimum levels under Pillar I as set out in Article 92 of CRR and under Pillar II ("add-on") arising from Article 138(1)(2a) of Banking Law (Journal of Laws of 2017, item 1876) and combined buffer requirement set out in Act of 5 August 2015 on macroprudential supervision over the financial system and crisis management (Journal of Laws of 2015, item 819).

From 1 January 2019 the conservation buffer is 2.5 p.p.

Based on the assessment of the systemic importance of the bank, the KNF in its decision of 19 December 2017, as presented in letter No DAZ/7105/5/7/2017, identified the bank as an other systemically important institution (O-SII) and imposed O-SII buffer on the Bank. Based on the Polish Financial Supervision Authority's decision dated 16 December 2022 the Bank is currently required to maintain the O-SII buffer in the amount equivalent to 1% of the total risk exposure amount calculated in accordance with art. 92 par. 3 of the CRR.

Pursuant to the decision of the Polish Financial Supervision Authority of 21 November 2025, the Bank is required to maintain a buffer for another systemically important institution in the amount equivalent to 1.50%. The Santander Bank Polska S.A. Group maintains its capital buffer at the same level.

On 12 November 2019 Bank received the decision of the Polish Financial Supervision Authority (no DBK.700.57.2019 dated 5 November 2019) regarding the expiry of a decision issued by Polish Financial Supervision Authority dated of 15 October 2018 (no DBK-DBK2.700.21.2018) in the subject of maintain own funds to cover the additional capital requirement to secure the risk arising from FX mortgage loans for households at over the amount calculated in accordance with the detailed rules set in Regulation. Thus, the Bank is not obliged to keep the additional capital requirement indicated in the expired decision.

The Bank received a letter from the Polish Financial Supervision Authority No. DBK-DBK2B. 700.2.2023 dated 21 December 2023, recommending that the Bank comply with an additional own funds requirement in excess of the value resulting from the requirements calculated in accordance with the detailed rules set out in CRR at the level of the Santander Bank Polska S.A. Capital Group. The Commission recommended maintaining own funds to cover the additional capital requirement to secure the risk arising from foreign currency mortgage loans to households at the level of the Capital Group in the amount of 0.013 p.p. for the total capital ratio referred to in Article 92(1)(c) CRR, which should consist of at least 75% Tier I capital (corresponding to a capital requirement of 0.010 p.p. above the Tier I capital ratio referred to in Article 92(1)(b) of CRR) and at least 56.25% of Common Equity Tier I capital (corresponding to a capital requirement of 0.007 p.p. above the Common Equity Tier I capital referred to in Article 92(1)(a) of CRR).

On 11 March 2025, the Bank received a decision from the Polish Financial Supervision Authority ("KNF") stating that the KNF decision of 21 December 2023 ordering the Bank to comply, on a consolidated basis, with an additional own funds requirement to secure the risk arising from mortgage-backed foreign currency loans and advances to households had expired. Therefore, the Bank is not required to maintain an additional own funds requirement in this respect.

To reduce the risk of credit availability in the economy being limited as a result of the COVID-19 pandemic, the Minister of Finance, based on a recommendation from the Financial Stability Committee, issued a regulation on 18 March 2020 exempting banks from maintaining a systemic risk buffer, which amounted to 3%.

On 25 November 2025, the Bank received a letter from the Polish Financial Supervision Authority informing it that, in the supervisory assessment process, the Bank's sensitivity to the possible materialisation of stress scenarios affecting the level of own funds and risk exposure was assessed as low. The total capital add-ons recommended under Pillar II, offset by the buffer requirement, amount to 0.00 p.p. at the individual level and 0.00 p.p. at the consolidated level. Therefore, the Polish Financial Supervision Authority does not impose an additional P2G capital charge to absorb potential losses resulting from extreme conditions.

Taking into account all requirements, the minimum capital ratios as at 31 December 2025 are as follows:

- Tier I capital ratio (T1) for the Bank and the Capital Group: 10.99%;
- Total capital ratio for the Bank and the Capital Group: 12.99%.

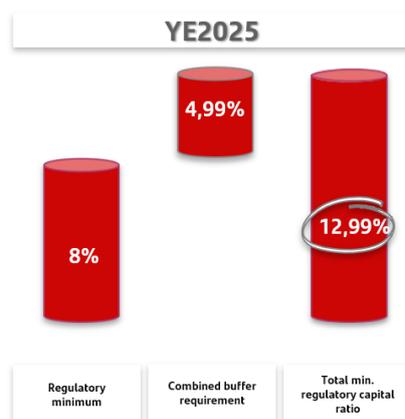
V. CAPITAL BUFFERS

The table below presents unconsolidated and consolidated minimum ratios.

CAPITAL BUFFERS OF SANTANDER BANK AND SANTANDER BANK POLSKA S.A. GROUP AT 31 DECEMBER 2025 AND 31 DECEMBER 2024

Components of the minimum capital requirement		31.12.2025	31.12.2024
Minimal capital ratios	Common Equity Tier 1 capital ratio	4.5%	4.5%
	Tier 1 capital ratio	6%	6%
	Total capital ratio	8%	8%
Additional capital requirement for Santander Bank Polska relating to the portfolio of FX mortgage loans for households	Santander Bank Polska	no requirement	no requirement
	Santander Bank Polska Capital Group:		
	· for total capital ratio:	✓ 0 p.p.	✓ 0.013 p.p.
	· Tier 1 capital ratio:	✓ 0 p.p.	✓ 0.010 p.p.
	· for Common Equity Tier 1 capital ratio:	✓ 0 p.p.	✓ 0.007 p.p.
The capital buffer for Santander Bank Polska as other systemically important institution		✓ 1.5 p.p.	✓ 1 p.p.
The capital conservation buffer maintained in accordance with the Macroprudential Supervision Act		✓ 2.5 p.p.	✓ 2.5 p.p.
The systemic risk buffer (SRB)		✓ 0 p.p.	✓ 0 p.p.
The institution specific countercyclical capital buffer		✓ 0.99 p.p.	✓ 0.02 p.p.
The bank's sensitivity to an unfavorable macroeconomic scenario measured using the supervisory stress tests results (P2G)	Santander Bank Polska	✓ 0 p.p.	✓ 0 p.p.
	Santander Bank Polska Capital Group	✓ 0 p.p.	✓ 0 p.p.

CAPITAL BUFFERS AND RATIOS OF SANTANDER BANK POLSKA S.A. GROUP AS AT 31 DECEMBER 2025



The Financial Stability Committee (hereinafter referred to as the Committee), by resolution of 14 June 2024, recommended a gradual increase in the countercyclical buffer for institutions with credit exposures in the Republic of Poland from the current level of 0% to a target level of 2%.

In accordance with the Act on Macroprudential Supervision, when deciding on the recommended level of the countercyclical buffer rate, the Committee takes into account, among other things, the credit gap, i.e. the deviation of the ratio of non-financial private sector debt to GDP from its long-term trend, and the phase of the financial cycle in Poland. When assessing the intensity of cyclical systemic risk in order to determine the appropriate level of the countercyclical buffer, the Committee also takes into account other indicators recommended by the European Systemic Risk Board, including the results of early warning models and a wide range of quantitative and qualitative information. In line with this approach, in Resolution No. 74/2024, the Committee recommended building a capital buffer with

V. CAPITAL BUFFERS

a target level of 2% of the total risk exposure of institutions with credit exposures in the territory of the Republic of Poland. At the same time, the Committee recommended a phased increase in the countercyclical buffer rate, first to 1% and then to 2%, with 12-month adjustment periods in each case. The Regulation of the Minister of Finance of 18 September 2024 on the countercyclical buffer rate implemented the first stage of Resolution No. 74/2024 by setting the countercyclical buffer rate at 1% from 25 September 2025. However, in accordance with the Regulation of the Minister of Finance and Economy of 25 September 2025 on the countercyclical buffer rate, a countercyclical buffer rate of 2% will be applied from 30 September 2026, which constitutes the implementation of the second stage of the introduction of the countercyclical buffer recommended by the Committee.

As at 31 December 2025, the countercyclical buffer rate, taking into account the exposure structure and applicable national buffers, was 0.99%.

K_67.02 - EU CCYB2 THE AMOUNT OF THE INSTITUTION SPECIFIC COUNTERCYCLICAL CAPITAL BUFFER AS AT 31 DECEMBER 2025 (PLN K)

1 Total risk exposure amount	132 664 295
2 Institution specific countercyclical capital buffer rate	0,99%
3 Institution specific countercyclical capital buffer requirement	1 316 954

V. CAPITAL BUFFERS

K_67.01 - EU CCYB1 TABLE - GEOGRAPHICAL DISTRIBUTION OF CREDIT EXPOSURES RELEVANT FOR THE CALCULATION OF THE COUNTERCYCLICAL BUFFER AS AT 31 DECEMBER 2025 (PLN K)

General credit exposures		Relevant credit exposures – Market risk				Own fund requirements			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)		
Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book						
Breakdown by country:														
177	Total	161 057 923	0	4 253 973	0	18 652 413	183 964 310	7 701 676	933	141 407	7 844 015	98 050 188	100%	0.0099
2	PL	157 089 514	0	4 253 973	0	18 652 413	179 995 900	7 423 645	933	141 407	7 565 985	94 574 807	96,46%	0.0100
153	LU	1 712 645	0	0	0	1 712 645	1 712 645	130 423	0	0	130 423	1 630 287	1,66%	0.0050
76	NL	546 926	0	0	0	546 926	546 926	34 655	0	0	34 655	433 192	0,44%	0.0200
49	GB	522 623	0	0	0	522 623	522 623	30 136	0	0	30 136	376 705	0,38%	0.0200
143	MT	391 142	0	0	0	391 142	391 142	27 871	0	0	27 871	348 392	0,36%	0.0000
95	AT	241 862	0	0	0	241 862	241 862	19 338	0	0	19 338	241 729	0,25%	0.0000
167	CZ	148 922	0	0	0	148 922	148 922	11 914	0	0	11 914	148 928	0,15%	0.0125
107	ES	111 481	0	0	0	111 481	111 481	8 922	0	0	8 922	111 526	0,11%	0.0050
105	FR	88 276	0	0	0	88 276	88 276	1 365	0	0	1 365	17 067	0,02%	0.0100
5	DE	72 320	0	0	0	72 320	72 320	3 590	0	0	3 590	44 877	0,05%	0.0075
136	CL	37 964	0	0	0	37 964	37 964	3 037	0	0	3 037	37 964	0,04%	0.0050
103	FI	29 550	0	0	0	29 550	29 550	2 192	0	0	2 192	27 403	0,03%	0.0000
151	MX	25 683	0	0	0	25 683	25 683	1 821	0	0	1 821	22 765	0,02%	0.0000
13	JP	5 299	0	0	0	5 299	5 299	212	0	0	212	2 651	0,00%	0.0000
11	PT	5 098	0	0	0	5 098	5 098	274	0	0	274	3 424	0,00%	0.0000
92	LI	4 679	0	0	0	4 679	4 679	435	0	0	435	5 432	0,01%	0.0000
6	UA	4 386	0	0	0	4 386	4 386	365	0	0	365	4 556	0,01%	0.0000
139	CH	3 562	0	0	0	3 562	3 562	180	0	0	180	2 254	0,00%	0.0000
3	IE	2 218	0	0	0	2 218	2 218	139	0	0	139	1 733	0,00%	0.0150
152	BE	2 161	0	0	0	2 161	2 161	373	0	0	373	4 669	0,01%	0.0100
90	CA	1 811	0	0	0	1 811	1 811	156	0	0	156	1 953	0,00%	0.0000
135	HR	1 668	0	0	0	1 668	1 668	102	0	0	102	1 271	0,00%	0.0150
1	US	1 032	0	0	0	1 032	1 032	54	0	0	54	671	0,00%	0.0000
131	DK	555	0	0	0	555	555	24	0	0	24	301	0,00%	0.0250
172	HU	515	0	0	0	515	515	40	0	0	40	503	0,00%	0.0100
35	GI	492	0	0	0	492	492	12	0	0	12	148	0,00%	0.0000
89	GE	400	0	0	0	400	400	36	0	0	36	446	0,00%	0.0000
84	AU	400	0	0	0	400	400	20	0	0	20	252	0,00%	0.0100
19	PE	384	0	0	0	384	384	31	0	0	31	384	0,00%	0.0000
45	CN	383	0	0	0	383	383	13	0	0	13	158	0,00%	0.0000
80	IT	356	0	0	0	356	356	26	0	0	26	324	0,00%	0.0000
113	NO	345	0	0	0	345	345	25	0	0	25	309	0,00%	0.0250
44	SE	344	0	0	0	344	344	17	0	0	17	209	0,00%	0.0200
30	SG	322	0	0	0	322	322	8	0	0	8	97	0,00%	0.0000
42	MD	291	0	0	0	291	291	26	0	0	26	323	0,00%	0.0000
26	TR	275	0	0	0	275	275	25	0	0	25	307	0,00%	0.0000
63	SK	264	0	0	0	264	264	24	0	0	24	295	0,00%	0.0150
20	IN	147	0	0	0	147	147	13	0	0	13	164	0,00%	0.0000
150	BY	138	0	0	0	138	138	12	0	0	12	153	0,00%	0.0000
56	CY	132	0	0	0	132	132	12	0	0	12	145	0,00%	0.0100

V. CAPITAL BUFFERS

116	AR	122	0	0	0	0	122	3	0	0	3	39	0,00%	0.0000
115	UZ	121	0	0	0	0	121	11	0	0	11	135	0,00%	0.0000
15	NP	103	0	0	0	0	103	9	0	0	9	115	0,00%	0.0000
72	LT	89	0	0	0	0	89	8	0	0	8	98	0,00%	0.0100
61	CO	79	0	0	0	0	79	7	0	0	7	89	0,00%	0.0000
114	AZ	62	0	0	0	0	62	6	0	0	6	69	0,00%	0.0000
110	ZW	55	0	0	0	0	55	5	0	0	5	62	0,00%	0.0000
165	KZ	54	0	0	0	0	54	5	0	0	5	61	0,00%	0.0000
104	ET	51	0	0	0	0	51	5	0	0	5	57	0,00%	0.0000
75	ID	49	0	0	0	0	49	4	0	0	4	55	0,00%	0.0000
138	QA	39	0	0	0	0	39	3	0	0	3	44	0,00%	0.0000
147	KG	35	0	0	0	0	35	3	0	0	3	39	0,00%	0.0000
128	RS	34	0	0	0	0	34	3	0	0	3	38	0,00%	0.0000
48	RO	28	0	0	0	0	28	2	0	0	2	31	0,00%	0.0100
17	BD	28	0	0	0	0	28	3	0	0	3	31	0,00%	0.0000
123	TM	27	0	0	0	0	27	2	0	0	2	31	0,00%	0.0000
140	PK	25	0	0	0	0	25	2	0	0	2	27	0,00%	0.0000
133	IS	20	0	0	0	0	20	2	0	0	2	22	0,00%	0.0250
24	RW	19	0	0	0	0	19	2	0	0	2	21	0,00%	0.0000
157	LV	18	0	0	0	0	18	2	0	0	2	19	0,00%	0.0100
141	EE	18	0	0	0	0	18	1	0	0	1	18	0,00%	0.0150
93	TJ	17	0	0	0	0	17	2	0	0	2	19	0,00%	0.0000
37	PA	17	0	0	0	0	17	2	0	0	2	19	0,00%	0.0000
4	AL	16	0	0	0	0	16	1	0	0	1	18	0,00%	0.0000
162	TW	15	0	0	0	0	15	1	0	0	1	17	0,00%	0.0000
119	GT	15	0	0	0	0	15	1	0	0	1	17	0,00%	0.0000
47	RU	14	0	0	0	0	14	1	0	0	1	16	0,00%	0.0000
22	PH	14	0	0	0	0	14	1	0	0	1	15	0,00%	0.0000
170	AM	13	0	0	0	0	13	1	0	0	1	15	0,00%	0.0150
34	MA	11	0	0	0	0	11	1	0	0	1	12	0,00%	0.0000
149	EG	9	0	0	0	0	9	1	0	0	1	10	0,00%	0.0000
124	NG	8	0	0	0	0	8	1	0	0	1	9	0,00%	0.0000
132	GR	8	0	0	0	0	8	0	0	0	0	4	0,00%	0.0025
163	IL	7	0	0	0	0	7	1	0	0	1	8	0,00%	0.0000
14	KR	7	0	0	0	0	7	1	0	0	1	7	0,00%	0.0100
39	BR	7	0	0	0	0	7	1	0	0	1	7	0,00%	0.0000
96	LK	7	0	0	0	0	7	1	0	0	1	7	0,00%	0.0000
122	TH	6	0	0	0	0	6	1	0	0	1	7	0,00%	0.0000
120	IQ	6	0	0	0	0	6	1	0	0	1	7	0,00%	0.0000
64	MN	5	0	0	0	0	5	0	0	0	0	5	0,00%	0.0000
9	GH	5	0	0	0	0	5	0	0	0	0	5	0,00%	0.0000
166	GS	4	0	0	0	0	4	0	0	0	0	5	0,00%	0.0000
41	JO	4	0	0	0	0	4	0	0	0	0	5	0,00%	0.0000
134	DZ	4	0	0	0	0	4	0	0	0	0	4	0,00%	0.0000
33	BG	3	0	0	0	0	3	0	0	0	0	4	0,00%	0.0200
91	SA	3	0	0	0	0	3	0	0	0	0	4	0,00%	0.0000
112	KE	3	0	0	0	0	3	0	0	0	0	4	0,00%	0.0000
43	VN	3	0	0	0	0	3	0	0	0	0	4	0,00%	0.0000
111	JE	3	0	0	0	0	3	0	0	0	0	4	0,00%	0.0000
46	MY	3	0	0	0	0	3	0	0	0	0	3	0,00%	0.0000
121	CG	2	0	0	0	0	2	0	0	0	0	3	0,00%	0.0000

V. CAPITAL BUFFERS

86	TN	2	0	0	0	0	2	0	0	0	0	3	0,00%	0.0000
66	BI	2	0	0	0	0	2	0	0	0	0	3	0,00%	0.0000
100	MU	2	0	0	0	0	2	0	0	0	0	2	0,00%	0.0000
160	CU	2	0	0	0	0	2	0	0	0	0	2	0,00%	0.0000
62	EC	2	0	0	0	0	2	0	0	0	0	2	0,00%	0.0000
79	UG	2	0	0	0	0	2	0	0	0	0	2	0,00%	0.0000
21	ME	1	0	0	0	0	1	0	0	0	0	2	0,00%	0.0000
51	BO	1	0	0	0	0	1	0	0	0	0	2	0,00%	0.0000
23	OM	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
126	BA	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
158	MK	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
8	LB	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
7	VE	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
12	NI	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
31	GM	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
36	LY	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
94	PS	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
77	SO	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
168	AE	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
85	ZA	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
69	TZ	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
156	ZM	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
101	BJ	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
118	MZ	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
38	HN	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
65	BT	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
53	CM	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
55	NZ	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
71	SL	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0000
127	SI	1	0	0	0	0	1	0	0	0	0	1	0,00%	0.0100
87	VG	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
98	NA	0	0	0	0	0	0	0	0	0	0	1	0,00%	0.0000
97	KW	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
159	KM	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
27	BZ	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
54	BW	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
125	TD	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
50	DO	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
74	MM	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
70	AI	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
129	AO	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
59	CD	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
16	SV	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
164	BH	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
142	GN	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
29	CR	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
154	MW	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
10	AF	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
73	MG	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
28	HT	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
144	HK	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0050

V. CAPITAL BUFFERS

82	GA	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
102	UY	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
145	CF	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
78	SR	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
130	SZ	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
68	MH	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
83	KH	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
148	LC	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
174	KY	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
60	ER	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
32	LS	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
175	LA	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
137	YE	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
146	DJ	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
171	TG	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
173	CI	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
169	IM	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
18	MC	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
67	TT	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
25	PY	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
88	FJ	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
176	BF	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
81	PG	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
40	KN	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
52	SN	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
109	BS	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
99	ML	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
155	SH	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
161	CV	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
57	IO	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
58	NE	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
108	JM	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
117	GW	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000
106	DM	0	0	0	0	0	0	0	0	0	0	0	0	0,00%	0.0000

VI. Capital adequacy

1. Capital adequacy management

It is the policy of the Santander Bank Polska S.A. Group to maintain the level of capital adequate to the type and scale of operations and the level of risk. The level of own funds required to ensure safe operations of Santander Bank Polska S.A. Group and capital requirements estimated for the unexpected loss is determined in accordance with the CRD/CRR package as amended and KNF recommendations regarding national options.

The Bank's Management Board is responsible for all capital management, capital estimation and maintenance processes, including processes related to the assessment of capital adequacy in various economic conditions (including the assessment of stress test results) and their impact on the level of internal capital, regulatory capital and the capital ratio. The Bank's Supervisory Board exercises general supervision over internal capital estimation processes.

The Bank's Management Board has delegated day-to-day capital management powers to the Capital Committee. The Capital Committee assesses the capital adequacy of the Bank and the Santander Bank Polska S.A. Group on an ongoing basis, including under stress conditions, monitors the amount of capital held and required, and initiates actions affecting the amount of own funds held (e.g. by recommending the amount of dividend payments). The Capital Committee is the primary body within the Bank responsible for determining capital policy, capital management principles and internal capital adequacy assessment principles. All decisions regarding the level of capital maintained (increase or release of capital) are ultimately made in accordance with applicable law and the Bank's Articles of Association by the relevant statutory bodies of the Bank and its subsidiaries.

As the parent company, the Bank exercises control over the capital adequacy of the entities comprising the Santander Bank Polska S.A. Capital Group as part of its corporate governance.

One of the Bank's significant subsidiaries covered by CRR is Santander Consumer Bank S.A., in which the Bank was the majority shareholder until 23 December 2025. On 23 December 2025, a final agreement was concluded with Santander Consumer Finance S.A. for the sale of 3 120 000 shares in Santander Consumer Bank S.A., representing 60% of the share capital of that company and 60% of the total number of votes in Santander Consumer Bank S.A., for a total sale price of PLN 3 105 000 000. The Transaction was closed on 23 December 2025, and from that date, the Bank, no longer being a shareholder of the indicated entity, excluded the entity from consolidation under capital requirements.

Capital Policy

The capital management policy of Santander Bank Polska S.A. Group stipulates the minimum capital ratios, taking into account regulatory requirements, applicable capital buffers and additional own fund requirements under Pillar II.

Pursuant to CRR, institutions must at all times satisfy the following own funds requirements:

- Common Equity Tier 1 capital ratio of 4.5%;
- Tier 1 capital ratio of 6%;
- Total capital ratio of 8%.

As at 31 December 2025, the minimum capital ratios of the bank and Santander Bank Polska S.A. Group satisfying the regulatory recommendations and additional own fund requirements under Pillar II were as follows:

- 10.99% Tier I capital ratio at the level of Santander Bank Polska S.A. and its Capital Group;
- 12.99% total capital ratio at the level of Santander Bank Polska S.A. and its Capital Group.

The above minimum capital ratios take into account all current requirements for the combined buffer requirement.

Dividend Recommendations of the Polish Financial Supervision Authority

In the letter of 22 December 2025 the KNF presented its stance on the dividend policy of commercial banks in 2026.

In accordance with the requirements set by the Regulator, 50% of 2025 profit could only be distributed by the banks which meet the basic criteria, in particular:

- Their Tier I capital ratio is not lower than the minimum required level:
 - ✓ 6% +75%*add-on + combined buffer requirement (taking into account the announced target level of the countercyclical buffer, i.e. 2%) + P2G buffer;
- Their total capital ratio is not lower than the minimum required level:
 - ✓ 8% + add-on +combined buffer requirement (taking into account the announced target level of the countercyclical buffer, i.e. 2%) + P2G buffer.

As recommended by the KNF, banks may distribute up to 75% of their profit if they meet all the criteria for distribution of up to 50% of the profit and their portfolio of loans granted to the non-financial sector is of a good credit quality (the share of non-performing loans is not higher than 5%, taking into account debt instruments).

The maximum possible dividend payout from the profit generated in 2025 is limited to 75% due to the expectation of strengthening the capital base in order to absorb the possible materialisation of risks accumulated in the environment of the Polish banking sector.

For the banks with a sizeable portfolio of foreign currency home loans, the dividend yield should be prudentially adjusted in line with the following criteria:

Criterion 1 – share of foreign currency home loans in the total portfolio of loans granted to the non-financial sector:

- Banks with the share above 5% – dividend yield to be adjusted by 20 p.p.;
- Banks with the share above 10% – dividend yield to be adjusted by 40 p.p.;
- Banks with the share above 20% – dividend yield to be adjusted by 60 p.p.;
- Banks with the share above 30% – dividend yield to be adjusted by 100 p.p.

Criterion 2 – share of foreign currency home loans granted in 2007-2008 in the portfolio of foreign currency home loans:

- Banks with the share above 20% – dividend yield to be adjusted by 30 p.p.;
- Banks with the share above 50% – dividend yield to be adjusted by 50 p.p.

For banks that are overly sensitive to changes in interest rates in terms of their interest income or economic value of capital, i.e. higher than the regulatory thresholds of SOT NII > -5% and SOT EVE > -15%, both at the individual and consolidated levels, the dividend rate should be further reduced by 25 p.p. The Tier I capital ratio required for Santander Bank Polska S.A. to pay out up to 50% and up to 75% of its generated profit, at the consolidated and individual levels, is 11.99%.

The total capital ratio required for Santander Bank Polska S.A. to pay out up to 50% and up to 75% of its generated profit, at the consolidated and individual level, is 13.99%.

Taking into account the above requirements, as at December 31, 2025, Santander Bank Polska S.A. meets the criteria for paying a dividend of up to 75% of the annual profit generated in 2025, both at the separate and consolidated levels. Taking into account the sensitivity of the Bank's interest income or economic value of capital to changes in interest rates and the Bank's exposure to foreign currency housing loans to households as at December 31, 2025, the adjustment to the dividend payout ratio from annual profit based on the above criteria is 0 p.p.

2. Regulatory capital adequacy

Pursuant of Article 92 of CRR, total capital ratio is determined on the basis of own funds and total capital requirements multiplied by 12.5.

The capital requirement for Santander Bank Polska S.A. Group as at 31 December 2025 was determined in accordance with Regulation No. 575/2013 of the European Parliament and the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms as well as KNF recommendations regarding national options.

The capital requirements for credit, market and operational risks were calculated using a standardised approach. The capital requirement for credit risk is the most significant one.

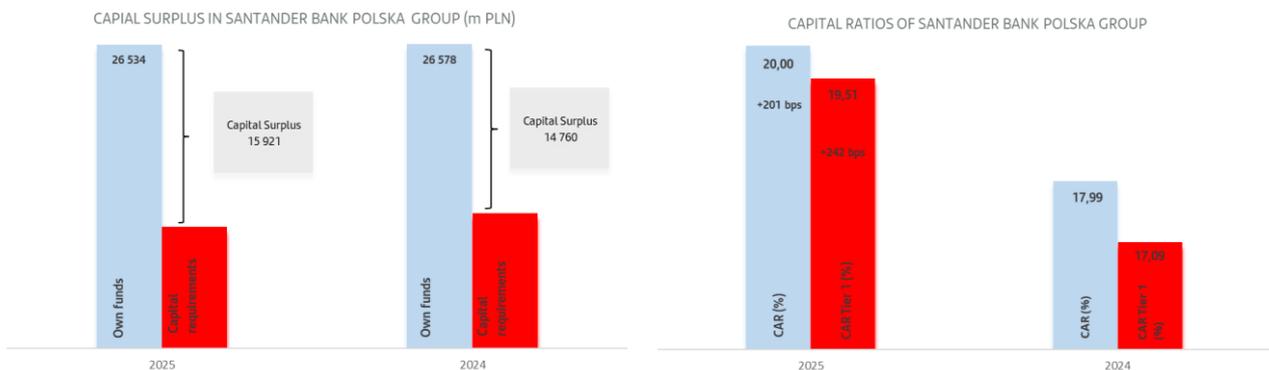
The value of asset exposure is the carrying value of the asset after adjustments for specific credit risk, additional value adjustments and other own fund deductions related to a particular asset. The off-balance sheet exposure is the percentage of the nominal value less adjustments for specific credit risk.

Considering the total capital requirement as at 31 December 2025 of PLN **10 613 144k** and own funds of PLN **26 533 804k**, the capital ratio of Santander Bank Polska S.A. Group stood at **20.00%**.

The total capital ratio as of 31 December 2025 compared to the total capital ratio as of 31 December 2024 was influenced by, among the following factors:

- A definitive agreement was concluded with Santander Consumer Finance S.A. for the sale of 3 120 000 shares in Santander Consumer Bank S.A., representing 60% of the share capital of that company and 60% of the total number of votes, for a total sale price of PLN 3 105 000 000, as a result of which the Bank excluded the aforementioned entity from prudential consolidation. The estimated impact of the deconsolidation of Santander Consumer Bank S.A. on the total capital ratio as at 31 December 2025 was +119 bp. After excluding the operational risk requirement, the estimated impact would be +152 bp in total;
- Distribution of profit generated in 2024 and payment of dividends to shareholders;
- Amortization of subordinated loans recognized in Tier II capital and early repayment of one of them;
- Implementation of CRR III regulations;
- Business development (both in terms of retail and corporate exposures);
- Reduction in the value of the portfolio of foreign currency loans secured on residential real estate;
- Completion of the following securitizations:
 - ✓ On 26 June 2025 synthetic securitization transaction concluded by Santander Bank Polska S.A. on a portfolio of corporate receivables;
 - ✓ On 9 December 2025 synthetic securitisation transaction concluded by Santander Bank Polska S.A. on a portfolio of cash loans granted to individuals.

CAPITAL ADEQUACY OF BANK GROUP IN 2025, 2024



3. Internal capital adequacy

Notwithstanding the regulatory methods for measuring capital requirements, Santander Bank Polska S.A. Group carries out an independent assessment of current and future capital adequacy as part of the internal capital adequacy process (ICAAP). The purpose of the process is to ensure that the level and nature of own funds guarantee the solvency and stability of the Bank's and the Group's operations.

The capital adequacy assessment is one of the fundamental elements of the Group's strategy, the process of defining risk appetite and the process of planning.

The internal capital estimation process is based on the internal capital estimation methodology approved by the Model Risk Management Committee. For specific risks identified in the Bank's and Group's business or recommended by local regulations or supervision authorities for inclusion in the internal capital estimation process, the Group applies internal risk measurement models or methodologies for measurable risks and add-ons approach for qualitative (difficult to measure) risks.

The following risks are subject to the statistical loss estimation models:

- Credit risk including credit concentration risk (credit risk);
- Operational risk;
- Market risk (in the trading book and banking book);
- ALM risk;
- Credit spread risk;
- Business risk.

In the case of credit risk the internal capital is estimated on the basis of risk parameters including the probability of default of Santander Bank Polska S.A. Group customers (PD - probability of default) and loss given default (LGD loss given default).

Other risks, e.g. reputational risk and compliance risk, are treated as quality risks that the Bank manages in line with written procedures and policies and supervises within the assigned ownerships and relevant committees.

Santander Bank Polska S.A. Group performs an internal assessment of capital requirements, including under stressed conditions, taking into account different macroeconomic scenarios.

Internal capital estimation models and methodologies are assessed and reviewed annually to adjust them to the scale and profile of the Group's business and to take account of any new risks and the management judgement.

The review and assessment is the responsibility of the Group's risk management committees, including: Capital Committee and Model Risk Management Committee.

VII. Securitisation

Santander Bank Polska S.A. Group presents information on securitisation in accordance with points j)-l) of Article 449 of the CRR.

The Santander Bank Polska S.A. Group does not disclose tables EU SEC2 and EU SEC4 because it does not have securitisation in its trading portfolio and does not act as an investor.

Santander Bank Polska S.A.

Synthetic securitisation 2022

On **31 March 2022**, Santander Bank Polska S.A. concluded with the International Finance Corporation (IFC) a securitisation transaction, as a result of which a portfolio of cash loans in the amount of PLN 2 443 520k was covered by the guarantee, with the possibility of increasing this amount in the future to the level of PLN 2 878 788k. The transaction is the first transaction concluded by the Bank and entities of the SBP Group with this investor. Its purpose is to release the capital that the Bank will allocate to finance climate projects (projects related to climate change mitigation, focusing mainly on renewable energy sources, energy efficiency and financing green real estate projects) with a total value of at least USD 600 000k.

The transaction is a synthetic securitisation without a financing element, and the selected portfolio of cash loans covered by it remains included in the Bank's balance sheet.

The transaction is set to expire by 31 January 2030. Santander Bank Polska S.A. is the originator of the synthetic securitisation and it does not perform any other roles in the synthetic structure in question. No Securitisation Special Purpose Entities (SSPE) participate in the transaction.

The transaction is an implementation of the Bank's Tier 1 capital optimization strategy by transferring a significant part of the risk (SRT) related to securitized credit exposures to a third party (IFC), in accordance with Art. 245 (1) (a) and Art. 245 (2) (a) of the CRR Regulation. The structure of the transaction assumes the division of the securitized portfolio into three tranches: the senior tranche (82.67% of the portfolio), the guaranteed mezzanine tranche (16.5% of the portfolio) and the first loss tranche junior (0.83% of the portfolio). Only the guaranteed tranche is covered by unfunded credit protection in the form of a guarantee granted to the Bank by IFC on the basis of the Guarantee Agreement. The IFC is qualified according to Art. 117 of the CRR Regulation as a multilateral development bank which, based on the principles set out in the CRR Regulation, can be assigned a risk weight of 0%.

As at 31 December 2025, the value of the securitised portfolio amounted to PLN 371 479k. The values of individual tranches were presented as follows:

- Senior tranche PLN 306 612k;
- Mezzanine tranche PLN 61 196k;
- Junior tranche PLN 3 671k.

The first loss tranche is deducted from Tier 1 capital, pursuant to Article 36(1)(k) of the CRR, as an alternative to applying a risk weight of 1 250%.

As at 31 December 2025, the total amount deducted from Tier 1 capital due to the above securitisation is PLN **1 528k**, and the senior tranche generated a risk-weighted exposure amount of PLN **133 851k**.

Synthetic securitisation 2024

On **26 June 2024**, Santander Bank Polska S.A. entered into a synthetic securitisation transaction on a corporate loans portfolio with a total nominal value of PLN 3 730 485k. The securitised portfolio was divided into three tranches, determining the order of credit loss allocation: senior (92.4% of the portfolio), mezzanine (6.85% of the portfolio) and first loss tranches (0.75% of the portfolio).

The junior tranche and senior tranche were acquired by Santander Bank Polska S.A. The mezzanine tranche was acquired in full by external investors. The transaction structure does not use the Synthetic Excess Spread. As part of the transaction, Santander

VII. SECURITISATION

Bank Polska S.A. obtained credit risk protection in a synthetic form in relation to the exposures from the portfolio, in the form of funded credit linked notes ("CLNs") issued directly by Santander Bank Polska S.A. The CLNs cover losses on the securitisation portfolio in the amount of the mezzanine tranche. The requirement to maintain a significant net economic share is met by retaining randomly selected eligible exposures representing at least 5% of the nominal value of the securitised loans.

The emission of CLN Bonds with a nominal value of PLN 256 000k was carried out on 26 June 2024 and introduced to trading in the alternative trading system on Vienna MTF, organised by Wiener Börse AG (Vienna Stock Exchange), with ISIN code XS2846982820, with a maturity date of 31 December 2033. The Bank has the option of early repayment of liabilities arising from CLN Bonds. However, the value of CLN bonds as at 31 December 2025 amounted to PLN 145 949k.

As at 31 December 2025, the value of the securitised portfolio amounted to PLN 1 750 302k. The values of individual tranches were presented as follows:

- Senior tranche PLN 1 614 941k;
- Mezzanine tranche PLN 126 221k;
- Junior tranche PLN 9 140k.

As of 31 December 2025, the senior tranche generated the amount of risk-weighted assets of PLN **331 671k**. Moreover, in connection with the application of a regulatory volatility adjustment in the event of a currency mismatch for the securitisation position resulting from the mezzanine tranche covered by credit protection, the Bank includes an additional amount of risk-weighted assets in the amount of PLN **34 801k**. The total amount of risk weighted assets for securitisation is PLN **366 472k**.

On 17 December 2024, Santander Bank Polska S.A. concluded a synthetic securitisation transaction on a portfolio of cash loans granted to natural persons with a total nominal value of PLN 4 499 975k.

The securitized receivables portfolio was divided into three tranches: senior tranche (89.49% of the portfolio), mezzanine (8.76% of the portfolio) and junior tranche, which is the first loss tranche (1.75% of the portfolio). The junior and senior tranches were taken up by the Bank. The mezzanine tranche was taken up in full by external investors not related to the Bank.

As part of the transaction, on December 17, 2024, Santander Bank Polska S.A. issued CLN Bonds marked with the ISIN code XS2944989313 with a maturity date of February 7, 2033, with a nominal value of PLN 394 000k. The Bank has the option of early repayment of liabilities arising from the CLN Bonds. On December 17, 2024, the CLN Bonds were introduced to trading in the alternative trading system on the Vienna MTF organized by Wiener Börse AG (Vienna Stock Exchange). However, the value of CLN bonds as at 31 December 2025 amounted to PLN 394 000k.

The requirement to maintain a significant net economic participation is met by retaining randomly selected eligible exposures representing at least 5% of the nominal value of the securitized loans. The agreement assumes a one-year replenishment period during which the Bank may supplement the transaction structure with the value of the amortized portfolio.

As at 31 December 2025, the value of the securitised portfolio amounted to PLN 4 382 264k. The values of individual tranches were as follows:

- Senior tranche PLN 3 924 616k;
- Mezzanine tranche PLN 383 961k;
- Junior tranche PLN 73 687k.

As at 31 December 2025, the total amount of deductions from Tier 1 capital due to the above securitisation amounted to PLN **48 921k**, and the senior tranche generated risk-weighted assets of PLN **412 132k**.

Synthetic securitisation 2025

On 26 June 2025, Santander Bank Polska S.A. entered into a synthetic securitisation transaction on a corporate loans portfolio with a total nominal value of PLN 4 182 447k. The securitised portfolio was divided into three tranches, determining the order of credit loss allocation: senior (91.5% of the portfolio), mezzanine (7.65% of the portfolio) and first loss tranches (0.85% of the portfolio).

VII. SECURITISATION

The junior tranche and senior tranche were acquired by Santander Bank Polska S.A. The mezzanine tranche was acquired in full by external investors. The transaction structure does not use the Synthetic Excess Spread. As part of the transaction, Santander Bank Polska S.A. obtained credit risk protection in a synthetic form in relation to the exposures from the portfolio, in the form of funded credit linked notes ("CLNs") issued directly by Santander Bank Polska S.A. The CLNs cover losses on the securitisation portfolio in the amount of the mezzanine tranche. The requirement to maintain a significant net economic share is met by retaining randomly selected eligible exposures representing at least 5% of the nominal value of the securitised loans. The agreement provides for an annual replenishment period during which the Bank may supplement the transaction structure with the value of the amortised portfolio.

As part of the transaction on 26 June 2025, Santander Bank Polska S.A. issued CLNs marked with ISIN code XS3097964541, maturing on 31 March 2036, with a nominal value of PLN 320 000k. The Bank has the option of earlier repayment of its bonds under the CLNs. On 26 June 2025, the CLNs were introduced to trading in the alternative trading system on the Vienna MTF organised by Wiener Börse AG (Vienna Stock Exchange). However, the value of CLN bonds as at 31 December 2025 amounted to PLN 320,000k.

As at 31 December 2025, the value of the securitised portfolio amounted to PLN 4 182 545k. The values of individual tranches were as follows:

- Senior tranche PLN 3 826 993k;
- Mezzanine tranche PLN 320 000k;
- Junior tranche PLN 35 552k.

As at 31 December 2025, the total amount of deductions from Tier 1 capital due to the above securitisation is PLN **23 554k**, and the senior tranche generated risk-weighted assets of PLN **445 622k**.

On 9 December 2025, Santander Bank Polska S.A. concluded a synthetic securitisation transaction on a portfolio of cash loans granted to individuals with a total nominal value of PLN 3 961 191k.

The securitised receivables portfolio was divided into three tranches: senior (89.5% of the portfolio), mezzanine (9.3% of the portfolio) and junior, which is the first loss tranche (1.2% of the portfolio). The junior and senior tranches were acquired by the Bank. The mezzanine tranche was acquired in full by external investors not affiliated with the Bank.

As part of the transaction, on 9 December 2025, Santander Bank Polska S.A. issued CLN Bonds with the ISIN code XS3237111789, maturing on 30 September 2034, with a nominal value of PLN 368 500k. The Bank has the option of early repayment of liabilities arising from CLN Bonds. On 9 December 2025, CLN Bonds were introduced to trading in the alternative trading system on Vienna MTF organised by Wiener Börse AG (Vienna Stock Exchange). However, value of CLN bonds as at 31 December 2025 amounted to PLN 368 500k.

The requirement to maintain a significant net economic interest is met by retaining randomly selected eligible exposures representing at least 5% of the nominal value of securitised loans. The agreement provides for an annual replenishment period during which the Bank may supplement the transaction structure with the value of the amortised portfolio.

As at 31 December 2025, the value of the securitised portfolio amounted to PLN 3 863 037k. The values of individual tranches were as follows:

- Senior tranche PLN 3 456 245k;
- Mezzanine tranche PLN 359 258k;
- Junior tranche PLN 47 534k.

As at 31 December 2025, the total amount of deductions from Tier 1 capital due to the above securitisation amounted to PLN **25 615k**, and the senior tranche generated risk-weighted assets of PLN **345 624k**.

In 2024 and 2025, Santander Bank Polska S.A. carried out securitisation transactions in which it acted as the originator, but did not perform any other roles within the analysed synthetic structure. No special purpose securitisation entities (SSPEs) participated in these transactions.

The transactions carried out took the form of synthetic STS securitisation with risk transfer, in accordance with Regulation (EU) No 2402/2017 of the European Parliament and of the Council on laying down a general framework for securitisation and creating a

specific framework for simple, transparent and standardised securitisation, and amending Directives 2009/65/EC, 2009/138/EC and 2011/61/EU and Regulations (EC) No 1060/2009 and (EU) No 648/2012, as amended – hereinafter referred to as the “Securitisation Regulation”. The securitisation involved selected loan portfolios that remain on the Bank’s balance sheet.

The transactions implement the Bank’s Tier 1 capital optimization strategy by transferring a significant part of the risk (SRT) related to securitized credit exposures to a third party, in accordance with Art. 245(1)(a) and Art. 245(2)(a) of the CRR Regulation.

The entire securitized portfolio is risk weighted according to the standard method. To calculate risk weights for individual tranches, the Bank used the SEC-SA method, in accordance with Art. 262 of the CRR Regulation.

First loss tranches are deducted from Common Equity Tier 1 capital items, based on Art. 36 section 1 letter k) CRR, as an alternative to the use of a risk weight of 1 250%.

Securitisation risks

The securitisation transactions carried out by the Bank are designed to reduce credit risk and release part of the capital. In the case of Santander Bank Polska S.A., securitisation risks include, but are not limited to risks resulting from the Bank’s role as the entity initiating and handling the transaction (monitoring of underlying transactions, reporting and debt collection). The Bank constantly analyses risks that may materialise after the conclusion of the securitisation transactions, as well as risks that may materialise in connection with the planned execution of subsequent securitisation transactions.

Santander Leasing S.A.

Synthetic securitisation 2020

On 19 June 2020 Santander Leasing S.A. made a guarantee agreement with the European Investment Fund (“EIF”). The pertinent guarantee relates to a lease and loan portfolio totalling approx. PLN 2 014 000k. The transaction is set to expire on 31 May 2031.

The guarantee agreement made by Santander Leasing conforms to the requirements set out in CRR Regulation regarding synthetic securitisation, however, it is not an STS transaction. The transaction is a synthetic securitisation which does not involve financing and it covers the selected portfolio of lease and loans which remain on the Company’s balance sheet.

Structure of the transaction is that the securitised portfolio is divided into three tranches: senior (85% portfolio), mezzanine (14.2%) and junior, i.e., the first loss tranche (0.8%). As at the guarantee activation date, the senior tranche totalled PLN 1 700 000k, the mezzanine tranche was PLN 284 000k and the junior tranche amounted to PLN 16 000k. The senior and mezzanine tranches are fully guaranteed by the EIF (in relation to the principal component of the underlying exposures). In addition, the mezzanine tranche is secured by a counter-guarantee from the European Investment Bank (EIB).

As at 31 December 2025, the value of the securitised loan portfolio amounted to PLN 138 800k. The values of individual tranches were as follows:

- Senior tranche PLN 112 121k;
- Mezzanine tranche PLN 11 347k;
- Junior tranche PLN 15 332k.

In the synthetic securitisation process, Santander Leasing S.A. acts as the initiating entity and does not play any other roles within the analyzed synthetic structure. The transaction does not involve special purpose entities for securitisation purposes (SSPE).

For the purposes of the said synthetic securitisation meeting capital adequacy, under Article 245(1)(b) of CRR the principal component of the junior tranche exposures will be deducted from Common Equity Tier 1. In addition, the value of Common Equity Tier 1 will be reduced by a value of the available Synthetic Excess Spread.

As at 31 December 2025 the cumulative deductions from Common Equity Tier 1 on account of securitisation amount to PLN **9 387k**.

On 9 January 2026, the early termination option (clean-up call) of the transaction was exercised. The company fulfilled all its contractual obligations. The early termination of the transaction resulted from the terms of the agreement, which provided for such a possibility in the event of a decrease in the value of the securitised portfolio below 10% of its initial value.

Synthetic securitisation 2021

On 16 December 2021 Santander Leasing S.A. made a guarantee agreement with the European Investment Fund ("EIF"). The pertinent guarantee relates to a lease and loan portfolio totalling approx. PLN 2 736 219k. The transaction is set to expire on 30 November 2030.

The guarantee agreement made by Santander Leasing S.A. conforms to the requirements set out in CRR Regulation regarding synthetic securitisation, however, it is not an STS transaction. The transaction is a synthetic securitisation which does not involve financing and it covers the selected portfolio of lease and loans which remain on SL's statement of financial position.

Structure of the transaction is that the securitised portfolio is divided into two tranches: senior (87.5% portfolio) and junior, i.e. the first loss tranche (12.5% portfolio). As at the guarantee activation date, the senior tranche was PLN 2 394 192k and the junior tranche amounted to PLN 342 027k. The junior tranche was guaranteed by EIF. Both the principal, as well as the interest components of the underlying exposures are covered by EIF guarantee. The Synthetic Excess Spread (SES) was not applied in the transaction.

As at 31 December 2025, the value of the securitised loan portfolio amounted to PLN 202 065k. The values of individual tranches were as follows:

- Senior tranche PLN 31 483k;
- Junior tranche PLN 170 582k.

In the synthetic securitisation process, Santander Leasing S.A. acts as the originator and does not perform any other roles within the analysed synthetic structure. No special purpose securitisation entities (SSPEs) are involved in the transaction.

The risk-weighted exposure amount for the retained tranche is calculated using the SEC-SA standardised approach, in accordance with Article 262 of the CRR.

As at 31 December 2025, the senior tranche generated a risk-weighted exposure amount of PLN 4 722k.

On 9 January 2026, the early termination option (clean-up call) of the transaction was exercised, with an annual settlement period for credit losses incurred. The company fulfilled all its contractual obligations. The early termination of the transaction resulted from the terms of the agreement, which indicated such a possibility in the event of a decrease in the value of the securitised portfolio below 10% of its initial value.

Synthetic securitisation 2023

On 28 September 2023 Santander Leasing S.A. made a guarantee agreement with the European Bank for Reconstruction and Development "EBRD". The pertinent guarantee relates to a lease and loan portfolio totalling approx. PLN 2 382 979k. The transaction is set to expire on 28 February 2032.

The guarantee agreement concluded by Santander Leasing S.A. meets the requirements specified in the CRR for synthetic securitisation. It does not contain a financing element, and the selected portfolio of lease and loan agreements covered by it remains recognised in the company's balance sheet.

The transaction structure provides for the securitised portfolio to be divided into three tranches: senior, mezzanine and junior (first loss). At the time the guarantee was activated, the amounts of the tranches were as follows: senior tranche PLN 2 097 021 thousand (88% of the portfolio), mezzanine tranche PLN 254 979k (10.7% of the portfolio) and junior tranche PLN 30 979k (1.30% of the portfolio). The mezzanine tranche was guaranteed by the EBRD.

The synthetic securitisation structure created under the guarantee agreement does not generate additional exposure for the company to risks characteristic of traditional securitisation transactions (e.g. liquidity risk associated with securitised assets).

As at 31 December 2025, the value of the securitised loan portfolio amounted to PLN 691 817k. The values of individual tranches were as follows:

- Senior tranche PLN 591 625k;
- Protected tranche PLN 71 936k;
- Junior tranche PLN 28 256k.

VII. SECURITISATION

As at 31 December 2025, the total amount of deductions from Tier 1 capital due to the above securitisation is PLN 24 953k, and the senior tranche generated a risk-weighted exposure amount of PLN 59 162k.

In the synthetic securitisation process, Santander Leasing S.A. acts as the originator and does not perform any other roles within the analysed synthetic structure. No special purpose securitisation entities (SSPEs) are involved in the transaction.

Synthetic securitisation 2024

On 20 November 2024, Santander Leasing S.A. signed a guarantee agreement with the European Investment Fund. The agreement assumes that the securitisation transaction covers a portfolio of receivables arising from leasing agreements and loan agreements worth PLN 3 945 652k.

The effective date of the Guarantee Agreement depends on the fulfillment of specified conditions. One of the key conditions determining the effective date of activation of the guarantee was the fulfillment of the obligation regarding the pre-allocation of capital released as part of the transaction for newly granted loans to the SME and MidCap sectors, in accordance with the requirements set by the European Investment Fund (EIF) and the European Investment Bank (EIB).

The Santander Bank Polska S.A. Group S.A. met all conditions necessary to activate the Guarantee Agreement on 16 December 2024. This means effective coverage of the securitized portfolio with credit protection in the form of a guarantee for 100% of the senior tranche and 100% of the mezzanine tranche. The first loss tranche (junior) has been retained in its entirety and will be deducted from Common Equity Tier 1 capital items, based on Art. 36 section 1 letter k) CRR, as an alternative to the use of a risk weight of 1.250%. Deduction from CET 1 capital implies the application of the "full deduction method" as set out in Art. 245 section 1 lit. b) of the CRR.

As at 31 December 2025, the total amount of deductions from Common Equity Tier 1 capital due to securitisation is PLN 37 391k.

The guarantee agreement assumes a two-year replenishment period, during which the entity may supplement the transaction structure with the value of the amortized portfolio. In order to maintain the stability of the portfolio structure, the transaction used the Synthetic Excess Spread (SES) mechanism with economic use-it-or-lose-it characteristics, enabling the allocation of losses outside the securitisation structure up to 0.7% of the portfolio size annually.

As of 31 December 2025, the value of the securitized portfolio is PLN 3 309 753k. The amounts of the tranches were as follows:

- Senior tranche PLN 2 813 290k;
- Mezzanine tranche PLN 469 985k;
- Junior tranche PLN 26 478k.

K_09.01 - EU-SEC1 - SECURITISATION EXPOSURES IN THE NON-TRADING BOOK AS AT 31 DECEMBER 2025 (PLN K)

	Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
	Traditional			Synthetic				Traditional		Synthetic	Traditional		Synthetic	Sub-total	
	STS	Non-STS		of which SRT	Sub-total	STS	Non-STS	Sub-total	STS		Non-STS				
		of which SRT	of which SRT							of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT
1 Total exposures	0	0	0	0	13 926 762	13 926 762	13 926 762	0	0	0	0	0	0	0	0
2 Retail (total)	0	0	0	0	8 458 378	8 458 378	8 458 378	0	0	0	0	0	0	0	0
3 residential mortgage	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4 credit card	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5 other retail exposures	0	0	0	0	8 458 378	8 458 378	8 458 378	0	0	0	0	0	0	0	0
6 re-securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7 Wholesale (total)	0	0	0	0	5 468 384	5 468 384	5 468 384	0	0	0	0	0	0	0	0
8 loans to corporates	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9 commercial mortgage	0	0	0	0	5 468 384	5 468 384	5 468 384	0	0	0	0	0	0	0	0
10 lease and receivables	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11 other wholesale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12 re-securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

VII. SECURITISATION

K_09.03 - EU-SEC3 - SECURITISATION EXPOSURES IN THE NON-TRADING BOOK AND ASSOCIATED REGULATORY CAPITAL REQUIREMENTS - INSTITUTION ACTING AS ORIGINATOR OR AS SPONSOR AS AT 31 DECEMBER 2025 (PLN K)

	Exposure values (by RW bands/deductions)				Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW
1 Total exposures	11 954 006	1 925 977	0	0	0	0	0	13 879 983	46 779	0	0	1 767 585	0	0	0	141 407	0
2 Traditional transactions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3 Securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4 Retail	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5 Of which STS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6 Wholesale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7 Of which STS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8 Re-securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9 Synthetic transactions	11 954 006	1 925 977	0	0	0	0	0	13 879 983	46 779	0	0	1 767 585	0	0	0	141 407	0
10 Securitisation	11 954 006	1 925 977	0	0	0	0	0	13 879 983	46 779	0	0	1 767 585	0	0	0	141 407	0
11 Retail underlying	8 103 459	308 140	0	0	0	0	0	8 411 599	46 779	0	0	955 492	0	0	0	76 439	0
12 Wholesale	3 850 547	1 617 838	0	0	0	0	0	5 468 384	0	0	0	812 093	0	0	0	64 967	0
13 Re-securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

K_09.05 - EU-SEC5 - EXPOSURES SECURITISED BY THE INSTITUTION - EXPOSURES IN DEFAULT AND SPECIFIC CREDIT RISK ADJUSTMENTS AS AT 31 DECEMBER 2025 (PLN K)

Exposures securitised by the institution - Institution acts as originator or as sponsor			
	Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
	Of which exposures in default		
1 Total exposures	18 916 264	130 872	31 841
2 Retail (total)	12 983 417	90 580	23 639
3 residential mortgage	0	0	0
4 credit card	0	0	0
5 other retail exposures	12 983 417	90 580	23 639
6 re-securitisation	0	0	0
7 Wholesale (total)	5 932 847	40 292	8 202
8 loans to corporates	0	0	0
9 commercial mortgage	5 932 847	40 292	8 202
10 lease and receivables	0	0	0
11 other wholesale	0	0	0
12 re-securitisation	0	0	0

VIII. Leverage ratio

The leverage ratio of Santander Bank Polska S.A. Group is set in accordance with Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 as amended and with the Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637.

The leverage ratio (LR) shall be calculated as an institution's capital measure divided by that institution's total exposure measure and shall be expressed as a percentage.

A reference day for the following data is 31 December 2025. Presented leverage ratio is calculated in relation to Tier 1 capital fully phased definition. Santander Bank Polska S.A. Group disclose the information on sub-consolidated basis. Fiduciary items are not eliminated from the total leverage ratio exposure.

K_70.00 - EU LR1 - LRSUM: SUMMARY RECONCILIATION OF ACCOUNTING ASSETS AND LEVERAGE RATIO EXPOSURES AS AT 31 DECEMBER 2025 (PLN K)

	Applicable amount
1 Total assets as per published financial statements	308 150 078
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	0
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	0
4 (Adjustment for temporary exemption of exposures to central banks (if applicable))	0
5 (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	0
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	0
7 Adjustment for eligible cash pooling transactions	0
8 Adjustment for derivative financial instruments	-1 099 923
9 Adjustment for securities financing transactions (SFTs)	586 627
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	14 751 186
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	0
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	0
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	0
12 Other adjustments	1 169 294
13 Total exposure measure	323 557 262

VIII. LEVERAGE RATIO

K_71.00 - EU LR2 - LRCOM: LEVERAGE RATIO COMMON DISCLOSURE AS AT 31 DECEMBER 2025 (PLN K)

	CRR leverage ratio exposures	
	a	b
	31.12.2025	30.06.2025
On-balance sheet exposures (excluding derivatives and SFTs)		
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	285 912 833	295 243 927
2 Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	281 391	339 303
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-531 293	-930 161
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	0	0
5 (General credit risk adjustments to on-balance sheet items)	0	0
6 (Asset amounts deducted in determining Tier 1 capital)	-3 062 005	-2 951 131
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	282 600 926	291 701 938
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	4 340 036	4 987 282
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	0	0
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	7 558 454	7 641 921
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	0	0
EU-9b Exposure determined under Original Exposure Method	0	0
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	0	0
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	0	0
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	0	0
11 Adjusted effective notional amount of written credit derivatives	0	0
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	0	0
13 Total derivatives exposures	11 898 491	12 629 203
Securities financing transaction (SFT) exposures		
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	13 720 032	11 501 698
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	0	0
16 Counterparty credit risk exposure for SFT assets	586 627	407 664
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	0	0
17 Agent transaction exposures	0	0
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	0	0
18 Total securities financing transaction exposures	14 306 659	11 909 362
Other off-balance sheet exposures		
19 Off-balance sheet exposures at gross notional amount	75 881 260	64 425 764
20 (Adjustments for conversion to credit equivalent amounts)	-61 130 074	-51 800 384
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	0	0
22 Off-balance sheet exposures	14 751 186	12 625 380
Excluded exposures		
EU-22a (Ekspozycje wyłączone z miary ekspozycji całkowitej zgodnie z art. 429a ust. 1 lit. c) i ca) CRR)	0	0
EU-22b (Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	0	0
EU-22c (Excluded exposures of public development banks (or units) - Public sector investments)	0	0
EU-22d (Excluded exposures of public development banks (or units) - Promotional loans)	0	0
EU-22e (Excluded passing-through promotional loan exposures by non-public development banks (or units))	0	0
EU-22f (Excluded guaranteed parts of exposures arising from export credits)	0	0
EU-22g (Excluded excess collateral deposited at triparty agents)	0	0
EU-22h (Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	0	0
EU-22i (Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	0	0
EU-22j (Reduction of the exposure value of pre-financing or intermediate loans)	0	0
EU-22k (Excluded exposures to shareholders according to Article 429a(1), point (da) CRR)	0	0
EU-22l (Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	0	0
EU-22m (Total exempted exposures)	0	0
Capital and total exposure measure		
23 Tier 1 capital	25 884 853	25 664 598
24 Total exposure measure	323 557 262	328 865 883
Leverage ratio		
25 Leverage ratio (%)	8,00%	7,80%
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	8,00%	7,80%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	8,00%	7,80%
26 Regulatory minimum leverage ratio requirement (%)	3,00%	3,00%
EU-26a Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%
EU-26b of which: to be made up of CET1 capital	0,00%	0,00%
27 Leverage ratio buffer requirement (%)	0,00%	0,00%
EU-27a Overall leverage ratio requirement (%)	3,00%	3,00%
Choice on transitional arrangements and relevant exposures		
EU-27b Choice on transitional arrangements for the definition of the capital measure	fully phased in	fully phased in
Disclosure of mean values		
28 Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	20 375 986	17 273 169
29 Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	13 720 032	11 501 698
30 Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	330 213 216	334 637 354
30a Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	330 213 216	334 637 354
31 Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7,84%	7,67%
31a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7,84%	7,67%

The data for June 2025 includes information on Santander Consumer Bank S.A. and its subsidiaries.

VIII. LEVERAGE RATIO

EU LR3 - LRSPL: SPLIT-UP OF ON BALANCE SHEET EXPOSURES (EXCLUDING DERIVATIVES, SFTS AND EXEMPTED EXPOSURES) AS AT 31 DECEMBER 2025 (PLN K)

	CRR leverage ratio exposures
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	285 662 931
EU-2 Trading book exposures	6 374 100
EU-3 Banking book exposures, of which:	279 288 831
EU-4 Covered bonds	0
EU-5 Exposures treated as sovereigns	104 224 405
EU-6 Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	2 265 093
EU-7 Institutions	9 328 344
EU-8 Secured by mortgages of immovable properties	82 884 227
EU-9 Retail exposures	21 605 905
EU-10 Corporates	22 637 935
EU-11 Exposures in default	2 592 042
EU-12 Other exposures (eg equity, securitisations, and other non-credit obligation assets)	33 750 880

As at 31 December 2025, the leverage ratio of Santander Bank Polska S.A. Group totalled 8,00% and was more than two fold higher than the minimum requirement of 3%.

The Santander Bank Polska S.A. Group has the Leverage & Excessive Leverage Risk Policy in place which defines the objectives and addresses the key aspects of measurement, monitoring and reporting the leverage ratio and its compliance with the regulatory requirements as well as identification, management and monitoring of excessive leverage risk. The document sets out the roles and responsibilities of the parties involved in the relevant processes.

Identifying the risk of excessive financial leverage is about identification of current and potential risk sources and factors and assessing their potential impact on activity of the Bank and the Bank's Capital Group.

Stress testing as per "Stress Testing Policy" is carried out under the risk measurement. Stress testing for the risk of excessive leverage takes place at least once a year as well as in the case of adverse events in the internal and external Bank environment.

When setting the limits of the risk appetite, Santander Bank Polska takes into account the results of stress testing. The overriding goal is to ensure stable revenues, liquidity and safe level of capital ratios.

Stress testing is performed based on objective scenario under regular analyses for the purpose of ICAAP.

The output received will be used for setting the right limits, these include the right credit portfolio concentration levels which guarantee optimal use of available capital and achievable return on the funds invested in lending.

Monitoring the risk of excessive leverage is, among others, about setting limits and watch level to keep the risk at a safe level and controlling these under the Bank's risk appetite.

The limits are set at least once a year and represent the appendix to the SBP Group Risk Appetite Statement. Utilisation of the limits is controlled monthly.

IX. Encumbered assets and unencumbered assets

An asset is treated as encumbered if it has been pledged or if it is subject to any form of arrangement to secure or credit-enhance any on-balance-sheet or off-balance-sheet transaction from which it cannot be freely withdrawn (for instance, to be pledged for funding purposes).

Presented information in according to 443 article of CRR.

K_20.01 - EU AE1 - ENCUMBERED AND UNENCUMBERED ASSETS OF SANTANDER BANK POLSKA S.A. GROUP AS AT 31 DECEMBER 2025 (PLN K)

	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA	
	010	030	040	050	060	080	090	100
010 Assets of the disclosing institution	7 343 165	3 517 456			306 124 905	86 446 450		
030 Equity instruments	0	0			729 519	0		
040 Debt securities	3 497 851	3 497 851	3 883 351	3 883 351	81 186 056	80 399 074	81 186 056	80 399 074
050 of which: covered bonds	1 147 567	0	0	0	21 598 564	0	0	0
060 of which: securitisations	0	0	0	0	0	0	0	0
070 of which: issued by general governments	3 219 175	3 219 175	3 614 316	3 614 316	65 542 700	65 254 561	65 542 700	65 263 633
080 of which: issued by financial corporations	1 262 392	278 676	278 676	278 676	11 396 324	10 888 722	11 396 324	10 888 827
090 of which: issued by non-financial corporations	81 925	0	0	0	1 566	0	1 566	0
120 Other assets	3 845 315	19 605			224 209 330	6 047 376		

K_20.02 - EU AE2 - COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED OF SANTANDER BANK POLSKA S.A. GROUP AS AT 31 DECEMBER 2025 (PLN K)

	Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
	of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA	
	010	030	040	060
130 Collateral received by the disclosing institution	0	0	11 749 049	8 213 201
140 Loans on demand	0	0	0	0
150 Equity instruments	0	0	0	0
160 Debt securities	0	0	11 749 049	11 424 898
170 of which: covered bonds	0	0	0	0
180 of which: securitisations	0	0	0	0
190 of which: issued by general governments	0	0	11 726 217	11 424 898
200 of which: issued by financial corporations	0	0	4 166	0
210 of which: issued by non-financial corporations	0	0	18 666	0
220 Loans and advances other than loans on demand	0	0	0	0
230 Other collateral received	0	0	0	0
240 Own debt securities issued other than own covered bonds or securitisations	0	0	0	0
241 Own covered bonds and securitisations issued and not yet pledged			0	0
250 TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	7 343 165	3 517 456		

K_20.03 - EU AE3 - SOURCES OF ENCUMBRANCE AS AT 31 DECEMBER 2025 (PLN K)

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
	010	030
010 Carrying amount of selected financial liabilities	3 988 186	5 614 257

The information contained in this disclosure regarding encumbered and unencumbered assets has been prepared on the basis of Commission Delegated Regulation (EU) No 2024/3172 of 29 November 2024 supplementing CRR with regard to regulatory technical standards for the disclosure of information on encumbered and unencumbered assets.

The scope of regulatory consolidation applied for the purposes of disclosure of encumbered assets is identical to the scope of application for the purposes of applying liquidity requirements on a consolidated basis as defined in Part Two, Chapter 2 CRR.

The figures in the above tables are presented at net carrying amount (including write-downs in accordance with IFRS 9).

As at 31 December 2025, Santander Bank Polska S.A. Group had assets which were encumbered on account of:

- Repo transactions;
- Financing agreements signed by Santander Bank Polska S.A. and subsidiaries with international financial institutions;
- Collateral connected with the Bank's operations in the derivatives market.

The development in time of encumbrances related to the Bank's financing agreements with international financial institutions results from:

- The value of assets constituting the collateral (an increase stemming from signing new financing agreements or subsequent tranches within the already concluded agreements, decreases stemming from payment of obligations under financing agreements);
- Parameters of financial instruments constituting collateral.

To secure financing agreements with international financial institutions, the Bank concluded agreements on financial pledge based on treasury bonds. The pledge coverage ratio depends on the Bank's rating and changes along with the rating upgrade/ downgrade. If the contractual collateral value goes below the required minimum level, the Bank is required to provide additional collateral.

The development in time in the encumbrances connected with the collateral provided in relation to the Group's operations in the derivatives market results from changes in the market value of the Bank's transactions with individual contractors in this market.

The category of unencumbered assets which the Group believes cannot be encumbered as part of the ordinary business includes selected credit portfolios.

All amounts and types of encumbered assets and off-balance sheet items, as presented in line 10 of EU AE3 are connected with liabilities.

In Santander Bank Polska S.A. Group there are no differences between the scope of regulatory consolidation for disclosing information on asset encumbrance and for the application of liquidity requirements on a consolidated basis. In both cases, the following entities are subject to consolidation:

- Santander Bank Polska S.A.;
- Santander Consumer Bank S.A. (until the third quarter of 2025 inclusively);
- Santander Leasing S.A.;
- Santander Factoring Sp. z o.o.

The value of exposure to be disclosed equals its net carrying amount. Average exposure values are estimated in two stages:

- First, mean values as at the end of the last four quarters are calculated. Each mean value includes values from four quarters (i.e. the current quarter and three previous ones);
- Next, the average of mean values from step one is calculated.

X. Liquidity risk measures

Santander Bank Polska S.A. presents information on liquidity risk measures in accordance with Article 451a para. 2 and 3 CRR.

The table below presents the disclosure of the amount and components of the net income coverage ratio.

K_73.00 - EU LIQ1 - QUANTITATIVE INFORMATION OF LCR (PLN K)

EU 1a Quarter ending on	Total unweighted value (average)				Total weighted value (average)			
	31.12.2025	30.09.2025	30.06.2025	31.03.2025	31.12.2025	30.09.2025	30.06.2025	31.03.2025
EU 1b Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS								
1 Total high-quality liquid assets (HQLA)					96 656 075	92 637 584	88 277 146	83 932 106
CASH - OUTFLOWS								
2 Retail deposits and deposits from small business customers, of which:	160 112 071	159 669 087	158 003 952	155 430 349	11 636 434	12 197 154	12 632 476	12 933 936
3 Stable deposits	111 591 603	107 774 080	103 101 397	98 045 146	5 579 580	5 388 704	5 155 070	4 902 257
4 Less stable deposits	47 945 606	51 407 970	54 445 977	56 821 151	6 056 854	6 808 450	7 477 406	8 031 679
5 Unsecured wholesale funding	74 066 566	71 442 143	68 184 879	64 776 730	33 332 697	31 633 070	29 934 450	28 297 459
Operational deposits (all counterparties) and deposits in networks of cooperative banks	13 450 111	12 874 044	11 881 385	10 998 927	2 888 338	2 825 450	2 671 661	2 534 929
7 Non-operational deposits (all counterparties)	58 507 560	57 279 606	55 412 752	53 161 718	28 335 465	27 519 126	26 372 047	25 146 445
8 Unsecured debt	2 108 894	1 288 493	890 742	616 085	2 108 894	1 288 493	890 742	616 085
9 Secured wholesale funding					0	0	0	0
10 Additional requirements	41 490 396	39 432 251	37 471 536	36 368 178	15 016 579	13 932 610	12 247 985	11 032 149
Outflows related to derivative exposures and other collateral requirements	10 499 675	9 917 916	8 917 708	8 001 625	10 499 675	9 917 916	8 917 708	8 001 625
12 Outflows related to loss of funding on debt products	0	0	0	0	0	0	0	0
13 Credit and liquidity facilities	30 990 721	29 514 335	28 553 829	28 366 554	4 516 904	4 014 694	3 330 277	3 030 524
14 Other contractual funding obligations	3 125 290	2 819 525	2 496 534	2 234 862	2 820 674	2 521 240	2 203 618	1 918 808
15 Other contingent funding obligations	27 595 738	28 641 774	28 853 585	28 376 009	1 379 787	1 432 089	1 442 679	1 418 800
16 TOTAL CASH OUTFLOWS					64 186 172	61 716 162	58 461 208	55 601 152
CASH - INFLOWS								
17 Secured lending (e.g. reverse repos)	6 653 869	6 055 709	5 864 161	5 970 178	0	0	0	0
18 Inflows from fully performing exposures	9 559 052	9 724 095	9 494 998	9 290 209	8 191 087	8 351 150	8 168 219	8 058 851
19 Other cash inflows	9 117 702	8 740 388	7 830 828	6 975 605	9 117 702	8 740 388	7 830 828	6 975 605
(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					0	0	0	0
EU-19a								
EU-19b (Excess inflows from a related specialised credit institution)					0	0	0	0
20 TOTAL CASH INFLOWS	25 330 623	24 520 192	23 189 986	22 235 992	17 308 789	17 091 538	15 999 047	15 034 456
EU-20a Fully exempt inflows	0	0	0	0	0	0	0	0
EU-20b Inflows subject to 90% cap	0	0	0	0	0	0	0	0
EU-20c Inflows subject to 75% cap	25 330 623	24 520 192	23 189 986	22 235 992	17 308 789	17 091 538	15 999 047	15 034 456
TOTAL ADJUSTED VALUE								
EU-21 LIQUIDITY BUFFER					96 656 075	92 637 584	88 277 146	83 932 106
22 TOTAL NET CASH OUTFLOWS					46 877 383	44 624 624	42 462 161	40 566 696
23 LIQUIDITY COVERAGE RATIO					207%	208%	208%	207%

The main factors influencing the Liquidity Coverage Ratio (hereinafter 'LCR') are:

- On the outflow side, retail deposits, and then non-operating non-retail deposits, additional outflows due to the impact of a negative market scenario on the valuation of derivatives and outflows due to irrevocable off-balance sheet liabilities, including those related to trade financing;
- On the inflows side, these are mainly the expected inflows from receivables from financial institutions (interbank and central bank deposits);
- On the side of liquid assets, the main part are liquid Treasury bonds or bonds fully guaranteed by the Treasury (including securities issued by the Polish Development Fund and Bank Gospodarstwa Krajowego as part of anti-crisis shields during the COVID-19 pandemic), government bonds of Germany, Spain, France, USA, UK and bonds issued by the European Investment Bank, NBP bills (NBP), and then cash and the surplus on NBP accounts over the amount of the required reserve.

The main factors remain substantially the same over time.

Disclosed LCR in December 2025 remains on high and safe level, much above both the regulatory and internal Group's limits. The indicator that remains at a high level is primarily the result of high level of deposit base (especially in 'stable retail deposits' category), realized issues, allocated mainly in high quality liquid assets and specification of operational deposits within non-retail customer deposits. An additional factor influencing the LCR ratio was the sale of the subsidiary Santander Consumer Bank S.A.

In line with the Liquidity Risk Policy, the Group prudently manages an appropriately diversified deposit base. Financing is mostly based on the current accounts and term deposits of individual clients and enterprises, mainly non-financial. The Group also focuses on diversifying sources of long-term financing, being present on wholesale markets by issuing debt and taking long-term loans on the financial market. A significant, but much smaller than the aforementioned, part of financing are own issues in the form of both subordinated and ordinary debt. It should be noted that in 2025 r. Bank has issued EUR 0.5 bn in September and PLN 3.0 bn in December, as well as two issues of Credit-linked notes as part of securitization in the total amount of PLN 689 mln, Santander Factoring Sp. z o.o. issued PLN 2 855 mln and Santander Leasing S.A. PLN 1.5 bn of new bonds. In the current strategy, the Group attempts to minimize the share of secured financing.

The main derivatives exposures of Group come from cross currency and fx swaps transactions. These transactions are aimed at obtaining funding in foreign currency (eg. CHF for financing of mortgages) from one side, and are the form of managing of liquidity surplus in currencies (eg. EUR) from the other hand.

LCR calculation include derivative payables and receivables during the next 30 days, posted and received collaterals (margin calls) due to valuation of derivative contracts and additional outflows due to impact of an adverse market scenario on derivative transactions (calculated with the usage of regulatory method of 'historical look back approach').

Notwithstanding the fulfillment of the required LCR limits at the aggregated level for all currencies, the Group maintains the LCR ratio above 100% for the domestic currency (PLN). In the case of the second currency identified as significant within the meaning of the CRR provisions, the periodically occurring mismatches are additionally monitored as part of the adjusted gap analysis and stress scenarios for the EUR currency. The Bank has the option of adjusting the liquidity position in EUR by acquiring liquid funds in this currency on the wholesale financial market, including, inter alia, FX swap transactions on dates beyond the LCR horizon (i.e. over 30 days).

The Group uses secured instruments to fund its activity to a limited degree only. In accordance with the existing contractual provisions, if the Group's rating is reduced no additional security on account of those instruments would be required.

X. LIQUIDITY RISK MEASURES

K_74.00 - EU LIQ2: NET STABLE FUNDING RATIO AS AT 31 DECEMBER 2025 (PLN K)

	Unweighted value by residual maturity				Weighted value
	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items					
1 Capital items and instruments	28 946 858	0	0	648 951	29 595 809
2 Own funds	28 946 858	0	0	648 951	29 595 809
3 Other capital instruments		0	0	0	0
4 Retail deposits		151 265 668	163 382	0	141 976 120
5 Stable deposits		113 656 659	142 857	0	108 109 541
6 Less stable deposits		37 609 008	20 525	0	33 866 580
7 Wholesale funding:		84 246 410	208 161	10 314 437	43 661 632
8 Operational deposits		14 732 701	0	0	7 366 351
9 Other wholesale funding		69 513 709	208 161	10 314 437	36 295 282
10 Interdependent liabilities		0	0	0	0
11 Other liabilities:	0	12 353 574	0	79 554	79 554
12 NSFR derivative liabilities	0				
13 All other liabilities and capital instruments not included in the above categories		12 353 574	0	79 554	79 554
14 Total available stable funding (ASF)					215 313 116
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					1 091 725
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		0	0	0	0
16 Deposits held at other financial institutions for operational purposes		0	0	0	0
17 Performing loans and securities:		33 493 154	9 399 476	129 831 702	115 241 203
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		12 846 788	0	0	0
19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1 612 970	78 040	7 177 264	7 377 581
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		9 272 825	8 217 601	80 214 549	76 927 580
21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		0	0	0	0
22 Performing residential mortgages, of which:		822 148	820 482	35 009 091	23 577 224
23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		822 148	820 482	35 009 091	23 577 224
24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		8 938 424	283 353	7 430 798	7 358 818
25 Interdependent assets		0	0	0	0
26 Other assets:		13 312 322	52 391	15 750 941	16 553 174
27 Physical traded commodities				0	0
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		0	0	0	209 979
29 NSFR derivative assets		163 967			163 967
30 NSFR derivative liabilities before deduction of variation margin posted		1 022 619			51 131
31 All other assets not included in the above categories		11 878 702	52 391	15 750 941	16 128 097
32 Off-balance sheet items		64 135 333	1 009 565	2 773 152	3 614 567
33 Total RSF					136 500 669
34 Net Stable Funding Ratio (%)					158%

XI. ESG risks

As at 31 December 2025, Santander Bank Polska S.A. Group presents information on ESG risks in accordance with Article 449a CRR, Commission Implementing Regulation (EU) 2024/3172, taking into account the consultation document EBA/CP/2025/07 of 22 May 2025, which is a draft of implementing technical standards amending Commission Implementing Regulation (EU) 2024/3172 with regard to the disclosure of information on ESG risks, capital exposures and total exposures to entities in the parallel banking system. Therefore, Santander Bank Polska S.A. Group does not disclose Templates 6-10.

Strategy and business processes

Santander Bank Polska S.A. Group adheres to the **Responsible Banking and Sustainability Policy** (hereinafter referred to as the Policy) which fosters the mitigation of ESG risks and complies with the following international conventions and standards:

- Equator Principles (International Finance Corporation guidelines);
- Universal Declaration of Human Rights;
- United Nations Global Compact;
- Principles for Responsible Banking (UNEP FI);
- United Nations Sustainable Development Goals;
- United Nations Guiding Principles on Business and Human Rights;
- OECD Guidelines for Multinational Enterprises;
- Fundamental conventions of the International Labour Organization.

According to the Policy, responsible banking is based on building sustainable value for all stakeholders. For this reason, the Group is committed to developing opportunities and managing the attendant risks. The document lays down the principles, ambitions and commitments in relation to shareholders, employees, customers and suppliers.

Under that Policy, Santander Bank Polska S.A. Group manages its **impact** in the **environmental area ("E")** in accordance with the prudence principle and strives to minimise its environmental footprint through sustainable banking operations and in-house management of environmental aspects. This approach involves: detection and analysis of environmental risks, opportunities and impacts as part of the assessment of financial transactions and investments, gradual development of portfolios that support energy transition and a climate-resilient economy, as well as incorporation of climate-related matters in risk management processes.

In the social area ("S"), Santander Bank Polska S.A. Group supports the development projects which contribute to financial inclusion, such as financial education, promotion of sound finances, entrepreneurship and employment, and mitigation of digital exclusion. As part of the social commitments contained in the Policy, the Group abides by the principle of equal treatment of all customers. As regards employee relations, we focus on building diverse teams of highly-skilled professionals. The Group exercises human rights due diligence in relation to its financial and investment operations as well as in dealings with suppliers. The Group abides by the following principles:

- To prevent the discrimination and practices against personal dignity;
- To prevent the forced labour or child labour;
- To respect the freedom of association and collective bargaining;
- To comply with Occupational Safety and Health Standards (OSHS);
- To offer fair conditions of employment;
- To facilitate work-life balance;
- To safeguard the right to the protection of personal data and privacy.

In the governance area ("G"), the Group promotes behaviours, processes and policies that support responsible conduct of business. The Group applies a solid and effective risk governance system. The Group maintains channels of dialogue and cooperation with stakeholders. Cooperation with business partners is based on the principle of equal treatment and non-corruption policy. At the same time, the Group encourages its suppliers to make commitments related to sustainability and transition to a low carbon economy. The

procurement process involves a CSR survey, which bidders participating in tender procedures are required to complete, and the results form part of the merit evaluation. The Bank also has a comprehensive ESG risk screening system for suppliers – a step toward full integration of environmental, social and corporate governance criteria into the management of relations with suppliers. In 2025, we also implemented the ESG Code for suppliers, which sets the minimum environmental, social and governance standards that the Group's counterparties are expected to comply with.

Under the above-mentioned Policy, environmental, social and governance (ESG) risks are recognised in the Group's **strategy**.

In 2025, the Group carried on with its new "We help you achieve more" strategy (launched in 2024). It emphasises that the challenges the Group and the society face require a huge responsibility. That is why the Bank takes ethical decisions, keeping in mind its impact on the community and the environment. With a sustainable business model, the Bank creates value for customers, employees, shareholders and local communities, working towards a better future for us, our children and the planet. This is what the Bank's third strategic direction – Total Responsibility – is about.

As part of its strategy, the Group takes steps to align its portfolio with the goals set in the Paris Agreement, regulatory requirements (in particular: ESRS and EBA guidelines) and EU policies which indicate that the financial sector plays a major role in mitigating the climate change. The Group's strategic objectives in this area are as follows:

- To stop providing financial services to power generation customers with more than 10% of revenues dependent on thermal coal by 2030 at the latest. This is with the exception of sustainable financing (in particular for: RES finance and energy transition finance) earmarked for improvement of energy efficiency, reduction of emissions and implementation of national plans for the transition to a low-carbon economy;
- To support customers in their transition process by providing comprehensive RES financing and developing adequate financial products.

The Group has been pursuing these goals by providing green financing (especially in the area of renewable energy sources), sustainable growth of the share of the RES portfolio among energy sector customers (currently approx. 30% of the total energy portfolio), and by providing sustainability-linked loans (SLL). This is done by means of the in-house Sustainable Finance and Investment Classification System (SFICS). It specifies the criteria to be met by specific and general purpose lending to be classified as green, social or sustainable finance. The system is based on the recognised market standards, including the EU taxonomy. Other guidelines that the system complies with are: ICMA Social and Green Bond Principles, Climate Bond Standards and LMA Sustainability Linked Loan Principles.

The regulation is updated on a regular basis in order to align it with evolving market standards and regulations. In 2025, we added new (additional) criteria concerning the closed loop economy and extended the scope of sustainable investment-related criteria. Please note that the SFICS is not the same system as the EU Taxonomy, even though it recognises a major part of technical criteria of the said Taxonomy (with respect to the criteria of substantial contribution to the environmental objectives of the EU Taxonomy). Specifically, it does not provide for a comprehensive verification of the "do no significant harm" criteria or the minimum social safeguards.

Sustainable finance initiatives are addressed both at corporate and retail customers. The Group supports business customers in their green transition as it helps them analyse their investments aimed to reduce GHG emissions. The offer addressed to retail customers comprises well-fitted products designed to finance energy efficiency solutions for buildings, electric vehicles, heat pumps, electric vehicle charging stations and energy storage systems. The market situation is monitored on an ongoing basis and further measures are determined to support the decarbonisation of the portfolio as effectively as possible.

In 2025, the total amount of green and sustainable financing extended in line with these criteria was PLN 10 156m which represents an increase compared to 2024, when the total amount was PLN 8 669m.

Since 2024, the Group has also been publishing green asset ratios (GAR). These show what proportion of assets are financed in accordance with the EU Taxonomy, environmentally sustainable in the context of climate change mitigation and adaptation. In 2024, the adjusted key green asset ratio in relation to the balance sheet according to the turnover ratio was 0.78%, and according to the investment expenditure ratio it was 1.06%. In 2025, they were 3.28% according to the turnover ratio and 3.56% according to the investment expenditure ratio.

It should be noted that the ratios for 2024 are not comparable to those for 2025. In accordance with regulatory guidelines, we present the ratios for 2024 according to the previous GAR calculation methodology, i.e. without recalculating them according to the new guidelines. This means that the denominator used to calculate last year's GAR ratios was higher than the denominator used to calculate the current ratios, which increases the level of the current ratios. In addition, the indicators for 2024 take into account the exposures of

Santander Consumer Bank S.A. and its subsidiaries, which have been assessed as compliant with the Taxonomy (mainly loans for renewable energy purposes).

The Bank applies the ESG risk criteria in its credit analyses. It specifies the criteria for cooperation, as well as identification, assessment, monitoring and management of environmental and social risks and other activities impacting climate change performed by customers, in particular those from the energy, oil and gas, soft commodities, mining and metal sectors. For more details, please see the section "ESG Risk Management".

In 2025, the Group adopted the Transition Plan for climate change mitigation. With regard to the loan portfolio, the Plan was based on the Guidelines of the European Banking Authority, and in particular the Guidelines on the management of ESG risks - EBA/GL/2025/01 (published in January 2025) – in particular chapter 6 – Plans compliant with Article 76(2) of the Directive 2013/36/EU. The Plan covers environmental and climate risks, in particular: the transition risk, physical risk and nature risk.

The Transition Plan covers the following sectors of the Group's loan portfolio:

- Power generation (Corporate and Investment segment) – total balance sheet exposure: PLN 2.6bn;
- Commercial real estate – total balance sheet exposure: PLN 8.4bn;
- Residential real estate (mortgages) – balance sheet exposure over PLN 58bn.

These sectors are treated as priorities in the Transition Plan, because:

- They represent a large share of the Group's portfolio (financial significance);
- They are sensitive to climate risks;
- Reference decarbonisation pathways are available.

The Transition Plan falls within the environmental ambitions defined in the Group Strategy for 2024–2026 and puts in practice the assumptions of the Environmental and Social Risk Management Policy (ESCC Policy). The Plan does not specify any quantified strategic decarbonisation targets at this point in time; however, the Group plans to set such goals in 2026 (in line with the last year's sustainability statement).

Corporate governance

Sustainability-related matters (including ESG risks) are discussed by the Bank's Management Board, the Supervisory Board and relevant committees. The Management Board and Supervisory Board approve the business strategy, also with respect to sustainable development. The Management Board oversees and approves the implementation of strategic objectives falling within the Total Responsibility framework as well as handles the integration of impacts, risks, opportunities and ESG criteria into the business strategy (in the short-, medium- or long-term perspective) and the risk management process. This includes climate risk management. Both of the Bank's decision-making bodies approve the key policies and internal control model as well as participate in risk review and approval processes. The Management Board and the Supervisory Board receive periodic reports on the implementation of the strategy, including the ESG objectives under the Total Responsibility strategic direction.

Strategic documents are drawn up by the Bank's relevant organisational units (stakeholders) and committees, in line with their responsibilities.

The allocation of powers within the Management Board provides for the following division of ESG agenda-related tasks and responsibilities:

- ESG risk management – Vice President of the Management Board in charge of the Risk Management Division;
- Green finance – member of the Management Board in charge of the Business and Corporate Banking Division;
- Coordination of the Group's responsible banking activities, including ESG qualitative reporting – Head of the Corporate Communication and Marketing Area operating outside the divisional structure;
- Quantitative reporting on ESG – member of the Management Board in charge of the Financial Accounting and Control Division.

In line with its terms of reference, the **Supervisory Board** oversees the development, implementation and execution of the responsible banking agenda and compliance with regulatory requirements on ESG. Starting from 2024, the powers of Supervisory Board committees, namely the Risk Committee and Audit and Compliance Committee, have been expanded. It was established that ESG risks would also be

addressed when reviewing the Group's risk profile, in the same way as when reviewing and making recommendations to the Supervisory Board with regard to risk policies comprising the general risk management framework of the organisation. The Audit and Compliance Committee monitors the Group's sustainability reporting process and reviews ESG ratings assigned to the Bank and the Group.

The key committee in charge of sustainability and ESG-related matters is the **ESG Committee**. Its tasks include supporting the Management Board in fulfilling its management responsibilities in relation to the strategic initiatives concerning sustainable development. The committee sets the direction for strategic actions and establishes and monitors sustainability goals across all areas of the Group's operations. The Chairman of this committee is the President of the Management Board.

The committee is composed of the President of the Management Board of Santander Bank Polska S.A. (Chair), all members of the Management Board and:

- Head of the Corporate and Investment Banking Division;
- Head of the Corporate Governance Department, outside the divisional structure;
- Head of the Corporate Communication and Brand Experience Area, outside the divisional structure;
- Head of the Strategic Partnerships and Leadership Area;
- Chief Employee Experience Officer, Business Partnership Division.

The Committee established the ESG Forum, a working group that coordinates the ongoing delivery of initiatives concerning responsible banking and sustainable development, including corporate culture, sustainable finance, ESG risks and climate strategy. It also monitors the progress in the implementation of ESG strategic actions by the Bank's subsidiaries. The ESG Forum submits periodic reports to the ESG Committee. The Forum is composed of the top executives from all divisions and areas.

In addition to the ESG Committee, the following decision-making bodies are responsible for the management of the Group's impact on ESG dimensions:

- Operational Risk Management Committee;
- Disclosure Committee;
- Information Management Committee;
- Risk Management Committee;
- Risk Management Forum;
- Compliance Committee;
- Credit Committee;
- Local Marketing and Monitoring Committee;
- Public Policy Committee.

Supervisory Board committees in 2025:

- Audit and Compliance Committee;
- Risk Committee;
- Nominations Committee;
- Remuneration Committee.

ESG powers are defined in the terms of reference of decision-making bodies, organisational units and committees, as well as in the **Responsible Banking Model**. This internal regulation defines the key responsibilities and processes in the area of responsible banking and sustainable development that comply with the Bank's applicable policies and strategies. It assigns the roles, tasks and accountability for key activities and processes so that they are delivered effectively. The Bank's subsidiaries have adopted the Model to the extent relevant to their operations.

To support the delivery of its commitments and objectives, the Bank recognises ESG factors in its incentive systems and management-by-objectives (MBO) systems. All of the Bank's employees have Total Responsibility-related goals assigned as obligatory targets recognised in their performance assessment (Total Responsibility being one of the key pillars of our strategy). These goals support the implementation of the sustainability strategy throughout the organization. In addition, the ESG component is one of the qualitative

factors taken into account in calculating the bonus pool for top executives, with weights ranging from -5% to +5% of their variable salary. The assessment takes into account the following aspects (above all): progress in the delivery of the sustainable finance agenda and the climate agenda, indicators related to employee equality and diversity, as well as the appropriate framework for managing sustainability issue across the Group and adequate reporting of sustainability information in compliance with regulatory requirements.

The ESG risk management in the Bank lies within the remit of the **ESG Risk Management Office** in the Risk Management Division. ESG risks are reflected in:

- The Division's strategy (by defining risk transmission channels to traditional banking risks);
- The Division's terms of reference (roles and responsibilities).

Oversight of this area is exercised through reports submitted at meetings of the Management Board committees (ESG Committee, Risk Control Committee), the Management Board, the Risk Committee of the Supervisory Board, and the Supervisory Board.

The Risk Management Division also includes the **ESG Panel** which is responsible for certification of sustainable finance in the context of internal and external regulations. This contributes to the prevention of greenwashing risk.

ESG risk management

When defining the ESG risk management framework, the Group relies on a number of regulations, guidelines and acknowledged standards. These comprise, inter alia:

- Guidelines of the European Central Bank;
- Guidelines of the European Banking Authority;
- Recommendations of the TCFD;
- United Nations Principles for Responsible Investment (UNPRI);
- Obligatory and voluntary standards for non-financial disclosures, including the CSRD and the GRI standard;
- Guidelines of the Polish Financial Supervision Authority (KNF) outlined in the "Letter to commercial banks on supervisory expectations in the ESG area".

The Bank does not recognise ESG risk as a separate material risk, but indicates its transmission channels to the following risks: credit, liquidity, compliance, reputational, business, and operational. At the same time, the Bank keeps extending its analysis of risk transmission channels and currently the analysed impact is being expanded to include market risk in the trading book and liquidity risk. The use of this approach has implications for the process of estimating and quantifying material risks.

ESG risk is also considered in the Bank's annual risk profile assessment.

The risk report presented to the Bank's Management Board and Supervisory Board includes qualitative information about ESG risk management.

The Group follows the **Environmental and Social Risk Management Policy** approved by the Management Board. It specifies the conditions of cooperation with customers from sensitive sectors such as oil and gas, energy production and transmission, mining and metals, and soft commodities. The document divides the activities in the above sectors into two categories: prohibited activities and activities subject to additional analysis. The adopted criteria are consistent with best practice and standards applicable in Santander Group and worldwide.

As regards the mining sector, the Group committed to terminate all of its exposures to thermal coal mining worldwide by 2030. The Group fulfilled these commitments in 2023 upon expiry of the last loan agreements. Also, a zero limit for this item was introduced in the Risk Appetite Statement. This is with the exception of sustainable financing (in particular for: RES finance and energy transition finance) earmarked for improvement of energy efficiency, reduction of emissions and implementation of national plans for the transition to a low-carbon economy. The underlying purpose is to provide financial support to those companies from the power-generation industry that implement sustainable and transformational projects even if their current operating model depends on the coal-based energy.

Environmental and Social Risk Management Policy also provides for such limitations as:

- No financing for any projects or activities related to oil and gas extraction, power generation or transmission, mining and metals, manufacturing, plantations or other major infrastructure projects located in the areas classified as Ramsar Sites, World Heritage Sites or by the International Union for Conservation of Nature (IUCN) as categories I, II, III or IV;
- No financing for any projects or expansion of existing facilities of the gas and oil sector located north of the Arctic Circle;
- No financing for the extraction, processing or wholesale distribution of asbestos.

Specific regulations are set out in implementing rules, such as the environmental and social risk analysis procedures for customers from the Corporate and Investment Banking (CIB) segment and the Business and Corporate Banking (BCB) segment.

The environmental and social risk for CIB customers are analysed locally for capital groups that operate in the sectors defined in the Policy (in particular: oil and gas, power generation and transmission, mining and metals and soft commodities sectors). Analysts investigate the ESCC (*Environmental, Social, Climate Change*) risk which is reflected in the customer's credit application and must be covered by periodic reviews. The assessment process is expanded to include new sensitive sectors, such as: automotive, food and chemical – in particular: production of plastics and agrochemicals.

In addition, a structured analysis of plans for transition into lower emissions is carried out for customers from high-carbon industries such as energy production based on fossil fuels, coal mining, airlines, and steelmaking.

Project finance is analysed in line with the Equator Principles (a market standard). It is a common language for assessment of environmental and social risks in projects, applied by large financial institutions worldwide. This assessment is carried out by the business line and ESCC analysts acting together. In the first step, the analyst determines the category of potential ESG risk attaching to the investment project, based on the project's scope, location and impact (among other criteria). The analysis as such involves the project documentation, the degree of detail being contingent on the assigned category. The follow-up recommendation has been added to the credit application.

The assessment of other corporate customers is currently largely automated and uses an algorithm which enables the preselection of climate risks. Customers are assigned environmental flags indicating the level of those risks. The flags are assigned to all customers as part of portfolio preselection carried out on the basis of the characteristics of specific companies (including their PKD business code indicating the nature of their business).

Moreover, if a potential higher ESG risk is identified by any participant of the lending process (the banker, the credit analyst or the Credit Committee), the ESG Risk Management Office will be requested to carry out an additional, individual analysis.

In 2024, the Bank put even more effort to comprehensively include ESG factors in the structured risk assessment process for BCB customers. In 2025, we implemented a solution dedicated to this segment.

With regard to personal customers, the Bank is primarily working on extending the scope of held and analysed data about transition risk and the risk of a change in consumer preferences in respect of the mortgage loan portfolio. In 2025, the Bank obtained information about the carbon intensity of mortgage loans raised with respect to buildings without energy certificates, using a dedicated model to estimate this parameter. Those data will also be crucial for developing the assessment of ESG risks (including climate risks) in the real estate segment.

Sector	Examples of sub-sectors
Agriculture	Crop growing, animal husbandry, horticulture, forestry
Industry	Food, beverages, tobacco, wood products, chemicals, plastics, building materials, machinery
Mining and metallurgy	Coal and metal ore mining, coke production, metal and steel production
Oil and gas	Mining, processing, distribution, integrated companies
Generation of electricity, with the split into conventional and renewable sources	All energy sources: coal, gas, oil, nuclear energy, solar energy, wind, biomass, energy distribution
Real estate, construction, mortgage loans	Mortgage loan for personal customers, financing of commercial real estate, construction
Transport	Production of cars and trucks and other means of transport, maritime transport, air transport, rail transport, car transport

In 2025, the Group extended the scope of its loan portfolio sensitivity analysis to cover climate risks, taking into account the nature risk and the full scope of sectors indicated by the EBA. We considered physical and transition risks in the 11 sectors which are most sensitive to climate risks. Nine out of those 11 sectors are strongly represented in the portfolio of Santander Bank Polska S.A. Group. Renewable energy generation was included as a separate sector, just as the year before. The sectors identified in the above process were assessed as relatively sensitive to climate risks. Other sectors and the non-mortgage retail credit portfolio were assessed as relatively insensitive to climate risk.

A climate risk materiality matrix was prepared for the identified sectors. The matrix is used as a basis for reporting for the following portfolios: the Corporate and Investment Banking (CIB), the Business and Corporate Banking (BCB), SME customers and mortgage loans (the remaining portfolios will be covered with the assessment as the methodology evolves).

The analysis looked at three horizons: by 2030, by 2040 and by 2050. The Group used climate scenarios defined by the Network for Greening the Financial System (NGFS), the world's leading group of central banks and supervisory authorities with more than 130 members (including the biggest institutions such as the European Central Bank, the Bank of England and the US Federal Reserve System) determined to ensure a better understanding and management of climate risks. The NGFS methodology provides for the following three scenarios:

- The Orderly Transition scenario, which assumes that climate policies are introduced early and become gradually more stringent, letting both physical and transition risks to become relatively subdued;
- The Disorderly Transition scenario, which assumes that climate policy efforts will be delayed or divergent across countries and sectors, thus increasing transition risks
- The Hot House World scenario, which assumes that global efforts are insufficient to halt significant global warming, leading thus to severe physical risks and irreversible impacts.

The main types of risks from both categories (physical risks and transition risks) were considered during the analysis. The risk was graded on a 1 to 5 scale, with 1 representing very low risk and 5 – very high risk. The analysis was qualitative, but it included the concept of double materiality: it considered both the channels of the Group's impact on climate change and the impact of climate change on the Group's performance. The methodology and scope of this analysis are being constantly developed to more accurately reflect the impact of climate risks on the Bank's portfolio. As a result of the methodology change (which involves e.g. a change in the taxonomy of sectors sensitive to climate risks), the results of the conducted analysis cannot be directly compared with the ones presented in reports 2022.

In the majority of scenarios, most sectors in the portfolio will be exposed to low **physical risks**. The risk was assessed slightly higher (as medium) for the energy and renewable energy sectors and for the agriculture and water supply sectors – hence the higher share and risk exposure of that category in the CIB and SME segments. This situation applies to the entire analysis period because NGFS scenarios predict that physical risks will only start to materialise in a significant way after 2050. The exposure would look slightly different in the Hot House World scenario, in which the risk is also assessed higher for the fuel sector and several other sectors in 2050 as physical risks may start to materialise a bit earlier in this scenario.

In the case of transition risks, the portfolio exposure to the transformation risk in the Orderly Transition scenario is slightly higher in the 2030 perspective owing to the very high risk assessment of the fuel sector and the metal and mining sector. The risk assessment of those two sectors is slightly lower in the 2040 and 2050 perspectives, which results in a lower portfolio exposure across all segments. The exposure is largest for the Corporate and Investment Banking (CIB) segment, given that the energy, mining and metal sectors represent a relatively sizable part of that portfolio. For other segments, the exposure results from the share of the transport sector in the said portfolio, and – in the case of the Business and Corporate Banking (BCB) segment – additionally from the considerable share of the metal sector.

In the slower-than-expected (Disorderly Transition) scenario, the exposure to climate risks remains at the top level until 2040: more than 20% of the CIB portfolio will be classified as very high risk (for the BCB portfolio, this figure will be 13%). For comparison, this category is not present at all within this time horizon if the transformation is orderly. In the period until 2050, the percentage share of high-risk categories will be much lower, especially in the BCB and SME segments.

The last of the analysed scenarios ("Hot House World") does not assume any fast or ambitious climate policy efforts, which leads to a significantly lower transition risk assessment compared to other scenarios. The exposure will slightly decline further by 2040. It is only the CIB portfolio where the exposure will grow by 2050 due to the share of the power sector.

The **results of the analyses of physical and transition climate risks** are included in the definition of transmission channels for relevant risks.

Credit risk:

- Impact of physical risk – a negative impact on borrowers and their repayment capacity, particularly in the case of the agri sector, where physical risk may reduce crop yields. More frequent and severe weather conditions and natural disasters may also decrease the value of loan collateral;
- Impact of transition risk – EU or national regulations may cause deterioration in the repayment capacity of business borrowers operating in specific sectors, notably high-carbon sectors such as energy, fuel, transport and logistics, or agriculture.

Liquidity and funding risk:

- Impact of physical risk – climate changes, including natural disasters and severe weather conditions, may cause a sudden increase in liquidity needs;
- Impact of transition risk – no significant impact of transition risk was identified.

Market risk:

- Impact of physical risk – risk of losses arising from changes in the value of the Group's assets and liabilities caused by natural disasters and severe weather conditions;
- Impact of transition risk – higher costs related to CO₂ emissions may result in an increase in costs for some companies (notably in the high-carbon sectors such as energy or fuel sectors). This may lead to a decrease in income generated by those companies and then in their investment capacity, which in turn may cause a reduction in the number of new credit applications. Furthermore, regulatory pressure may indirectly affect the financial market through the limitation of investments in specific customer groups.

Operational risk:

- Impact of physical risk – severe weather conditions may affect the operations of the Bank's branches (e.g. flood, power outage);
- Impact of transition risk – increased costs of energy may cause a rise in expenses incurred by the Bank (e.g. higher rental costs).

Reputational risk:

- Impact of physical risk – no significant impact of physical risk was identified;
- Impact of transition risk – continued financing of sectors which are negatively perceived by regulators, market participants and rating agencies (mainly high-carbon sectors) may adversely affect the perception of the Group.

The Bank and other Group entities considered climate change risks when preparing the financial statements in accordance with International Financial Reporting Standards, and where necessary, as appropriate. The analysis concluded that environmental issues do not have any significant impact on the financial statements as a whole.

In 2025, the Group delivered the following projects to develop the environmental risk quantification system:

- Full implementation of a systemic solution for obtaining data about the environmental and social aspects concerning the customers and for including that information in the credit risk assessment of corporate customers from segments lower than CIB;
- Estimation of the emission rate linked with the portfolios of business and retail mortgage loans. The Group uses the PCAF methodology. The Group has been working to improve the accuracy of estimates, by sourcing new types of data and having its business units engaged in direct communication with customers.

The Group manages environmental risk using internal data (collected during the lending process), publicly available data (e.g. non-financial reports of its counterparties) and data from external suppliers (e.g. rating agencies and physical risk data providers). The availability of the data of some counterparties about their exposure to environmental risks is currently limited. The Group monitors data availability on an ongoing basis and takes measures to obtain additional information from its counterparties. Moreover, the Group cooperates with BIK to develop the taxonomy data platform. The Group has been amending its current processes on an ongoing basis so as to collect the widest-possible range of environmental risk data. It is also building an analytical database to collect ESG-related data. The database will be used as a single data source for all business lines and risk units of the Group. The above solutions are implemented in stages. Their purpose is to create as accurate an ESG data repository as possible.

When developing the risk framework, supervising and managing the delivery of objectives and adherence to the strategy and policies related to **social and governance risk management**, the Bank takes into account the employee relationships and labour standards at its counterparties. In particular, when selecting suppliers, the Bank takes into consideration the implementation of policies regarding ethical conduct, compliance with law and social standards such as occupational health and safety requirements, diversity and inclusion in the workplace as well as adherence to the UN Global Compact principles. Currently, the Bank's assessment of counterparties does not include an analysis of their assessment of customer protection and responsibility for products.

XI. ESG RISKS

K_41.00 - TEMPLATE 1: BANKING PORTFOLIO - INDICATORS OF POTENTIAL TRANSITION RISK RELATED TO CLIMATE CHANGE: CREDIT EXPOSURE BY SECTOR, EMISSIONS, AND RESIDUAL MATURITY, AS AT 31 DECEMBER 2025 (MLN. EUR)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p			
	Gross carrying amount										Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting				Average weighted maturity
Balance sheet values disclosed in published financial statements	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation			Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	Of which Scope 3 financed emissions	of which Scope 3 financed emissions			<= 5 years	> 5 years <= 10 years	> 10 years <= 20 years	> 20 years			
1 Exposures towards sectors that highly contribute to climate change	13 856	176	1 297	737	-437	-69	-325	7 206 986	4 962 563	0	9 638	1 847	576	1 795	5				
2 A - Agriculture, forestry and fishing	188	0	11	6	-3	0	-2	309 372	84 620	0	109	73	4	1	5				
3 B - Mining and quarrying	387	0	8	0	0	0	0	268 688	121 866	1	24	2	0	361	19				
4 B.05 - Mining of coal and lignite	0	0	0	0	0	0	0	4	3	0	0	0	0	0	4				
5 B.06 - Extraction of crude petroleum and natural gas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4			
6 B.07 - Mining of metal ores	361	0	0	0	0	0	0	238 076	110 734	1	0	0	0	361	3				
7 B.08 - Other mining and quarrying	20	0	3	0	0	0	0	26 652	9 698	0	18	1	0	0	7				
8 B.09 - Mining support service activities	6	0	5	0	0	0	0	3 812	1 379	0	6	0	0	0	2				
9 C - Manufacturing	3 747	0	413	333	-148	-16	-121	3 155 066	2 399 639	0	2 659	617	49	421	5				
10 C.10 - Manufacture of food products	801	0	44	37	-21	-2	-16	1 049 116	919 613	0	605	148	6	42	1				
11 C.11 - Manufacture of beverages	133	0	1	0	0	0	0	81 377	71 572	0	27	10	0	84	5				
12 C.12 - Manufacture of tobacco products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4			
13 C.13 - Manufacture of textiles	70	0	2	1	-1	0	-1	42 201	34 362	0	60	5	2	2	2				
14 C.14 - Manufacture of wearing apparel	35	0	3	5	-5	0	-3	334	61	0	26	8	2	0	5				
15 C.15 - Manufacture of leather and related products of other materials	3	0	1	1	-1	0	-1	825	642	0	3	0	0	0	20				
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	131	0	19	11	-7	-1	-6	70 757	49 837	0	114	10	3	4	9				
17 C.17 - Manufacture of paper and paper products	182	0	16	4	-3	-1	-2	72 325	51 257	0	142	34	1	4	5				
18 C.18 - Printing and reproduction of recorded media	70	0	4	4	-4	0	-3	42 472	29 961	0	50	14	3	3	7				
19 C.19 - Manufacture of coke and refined petroleum products	55	0	18	35	-25	0	-25	30 269	17 294	0	43	0	0	12	3				
20 C.20 - Manufacture of chemicals and chemical products	234	0	6	74	-4	0	-3	594 672	395 996	0	121	13	1	98	3				
21 C.21 - Manufacture of basic pharmaceutical products and pharmaceutical preparations	31	0	2	0	0	0	0	14 841	8 453	0	6	24	0	0	1				
22 C.22 - Manufacture of rubber and plastic products	385	0	54	26	-13	-1	-10	220 348	125 885	0	268	87	1	29	5				
23 C.23 - Manufacture of other non-metallic mineral products	192	0	41	33	-13	-1	-12	157 231	89 556	0	147	25	2	17	5				
24 C.24 - Manufacture of basic metals	55	0	20	0	-1	0	0	43 385	31 374	0	36	7	1	11	10				
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	505	0	70	29	-20	-4	-15	396 788	285 711	0	356	94	12	39	4				
26 C.26 - Manufacture of computer, electronic and optical products	24	0	2	1	0	0	0	9 819	8 187	0	19	1	1	3	4				
27 C.27 - Manufacture of electrical equipment	162	0	11	1	-1	0	0	72 171	62 339	0	109	43	1	9	3				
28 C.28 - Manufacture of machinery and equipment n.e.c.	143	0	19	5	-4	0	-3	68 962	59 006	0	121	10	3	9	7				
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	157	0	38	10	-4	-1	-3	81 203	72 993	0	98	18	0	41	6				
30 C.30 - Manufacture of other transport equipment	65	0	3	38	-10	0	-9	23 536	21 090	0	49	9	1	7	2				
31 C.31 - Manufacture of furniture	164	0	14	9	-5	-1	-4	2 298	835	0	119	37	5	3	7				
32 C.32 - Other manufacturing	77	0	9	2	-2	0	-1	27 471	20 069	0	65	9	2	1	4				
33 C.33 - Repair, maintenance and installation of machinery and equipment	83	0	12	6	-4	-1	-3	35 921	27 984	0	69	9	3	2	5				
34 D - Electricity, gas, steam and air conditioning supply	700	176	41	1	-11	-8	-1	342 430	78 996	0	94	96	333	176	13				
35 D35.1 - Electric power generation, transmission and distribution	666	176	39	1	-11	-8	-1	302 563	69 694	0	61	96	333	176	13				
36 of which: D35.11 - Production of electricity from non-renewable sources	440	0	38	1	-10	-8	-1	137 485	31 670	0	13	94	333	0	12				
37 D.35.2 - Manufacture of gas, and distribution of gaseous fuels through mains	7	0	1	0	0	0	0	7 030	1 681	0	7	0	0	0	2				
38 D35.3 - Steam and air conditioning supply	26	0	0	0	0	0	0	32 814	7 557	0	26	0	0	0	1				
39 E - Water supply; sewerage, waste management and remediation activities	164	0	20	3	-3	-1	-1	119 540	51 343	0	90	54	3	17	6				
40 F - Construction	1 328	0	150	47	-43	-11	-29	285 446	234 102	0	1 043	224	29	32	3				
41 F.41 - Construction of residential and non-residential buildings	939	0	69	12	-13	-4	-7	70 040	56 510	0	727	188	14	11	4				
42 F.42 - Civil engineering	152	0	32	8	-7	-2	-5	69 213	59 080	0	123	9	3	17	4				
43 F.43 - Specialised construction activities	346	0	50	27	-23	-4	-17	150 676	122 312	0	299	28	14	3	8				
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3 527	0	356	157	-118	-16	-89	1 644 975	1 377 046	0	2 422	300	68	736	6				
45 H - Transportation and storage	1 072	0	148	56	-39	-8	-28	818 542	478 170	0	858	158	14	42	4				
46 H.49 - Land transport and transport via pipelines	826	0	135	47	-34	-7	-24	736 808	432 523	0	704	77	12	33	4				
47 H.50 - Water transport	47	0	0	0	0	0	0	11 520	6 824	0	0	46	0	0	6				
48 H.51 - Air transport	16	0	0	0	0	0	0	8 018	4 717	0	12	4	0	0	4				
49 H.52 - Warehousing, storage and support activities for transportation	175	0	12	7	-4	-1	-3	61 512	33 934	0	134	31	1	9	4				
50 H.53 - Postal and courier activities	10	0	1	2	-1	0	-1	1 165	442	0	9	0	0	0	5				
51 I - Accommodation and food service activities	552	0	46	44	-28	-3	-24	138 139	101 515	0	365	150	32	5	4				
52 L - Real estate activities	2 192	0	104	90	-42	-7	-30	124 789	35 326	0	1 973	173	43	3	3				
53 Exposures towards sectors other than those that highly contribute to climate change	3 937	1	443	63	-100	-27	-63				3 051	489	138	260	5				
54 K - Financial and insurance activities	87	0	4	0	-1	0	0				72	0	0	15	6				
55 Exposures to other sectors (NACE codes J, M-U)	3 850	1	439	63	-100	-27	-63				2 979	489	138	245	5				
56 TOTAL	17 793	178	1 740	800	-537	-96	-388	7 206 986	4 962 563	0	12 688	2 336	714	2 055	5				

The values presented in the ESG templates are presented in EUR million, calculated according to the average exchange rate of the National Bank of Poland as of 31 December 2025.

The Bank presents information on its banking book exposures (including loans and advances, debt securities, and equity instruments) to non-financial corporations by economic activity sector in the European Union (NACE) that significantly contributes to climate change, as well as a subtotal of exposures to other sectors. The data presented specifically covers the sectors listed in Sections A-H and L of Annex I to Regulation (EC) No 1893/2006, which includes the oil, gas, mining, and transport sectors as sectors that significantly contribute to climate change, in accordance with point 6 of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council with regard to minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks.

Counterparties that are excluded from the EU Paris-aligned benchmarks, as specified in Article 12.1, points (d) to (g) and Article 12.2 of Commission Delegated Regulation (EU) 2020/1818, meet the criteria:

- 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;

- 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
- 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
- 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 g CO₂ e/kWh;
- as well as companies that are found or estimated to significantly harm one or more of the environmental objectives.

The data on financed emissions presented in Template 1 (columns i-k) show the results of the Bank's carbon footprint calculation for Scope 3, Group 15 (investments) for the corporate customer financing portfolio, corresponding to individual sectors. In the process of estimating emissions, the Bank uses the PCAF methodology, which, in the absence of information on emissions directly from the contractor, provides the possibility of estimating emissions based on its physical or economic activity.

K_42.00 - TEMPLATE 2: BANKING BOOK - CLIMATE CHANGE TRANSITION RISK: LOANS COLLATERALISED BY IMMOVABLE PROPERTY - ENERGY EFFICIENCY OF THE COLLATERAL, AS AT 31 DECEMBER 2025 (MLN. EUR)

Counterparty sector	Gross carrying amount (Mln EUR)																
	Energy efficiency level (energy performance indicator in kWh/m ² of collateral)						Energy efficiency level (energy performance certificate label of the collateral)							Without an energy performance certificate label for the collateral			
	0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G	Including estimated energy efficiency level (energy performance indicator in kWh/m ² of collateral)			
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	
1 Total EU area	19119	6174	4956	3177	696	62	646	0	0	0	0	0	0	0	0	19119	64%
2 Of which Loans collateralised by commercial immovable property	6550	480	1463	1026	173	31	19	0	0	0	0	0	0	0	0	6550	38%
3 Of which Loans collateralised by residential immovable property	12569	5694	3493	2151	523	31	627	0	0	0	0	0	0	0	0	12569	78%
4 Including collateral obtained through foreclosure: residential and commercial real estate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100%
5 Including estimated energy efficiency level (energy performance indicator in kWh/m ² of collateral)	12252	4529	3574	2900	614	24	611									12252	100%
6 Total EU area	9	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0%	
7 Of which Loans collateralised by commercial immovable property	9	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0%	
8 Of which Loans collateralised by residential immovable property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	
9 Including collateral obtained through foreclosure: residential and commercial real estate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	
10 Including estimated energy efficiency level (energy performance indicator in kWh/m ² of collateral)	0	0	0	0	0	0	0								0	0%	

Columns H-N presenting information on the energy performance certificate label remain empty because the regulations in force in Poland do not require energy performance certificates to include letter grades from A to G.

Template 2 presents the gross carrying amount of the commercial and residential real estate distribution and the foreclosed security on the real estate, including information on energy capacity, measured by taking into account the ownership of non-renewable primary energy in [kWh/(m² · year)] based on the security performance certificate referred to in Article 2(12) of Directive 2010/31/EU. The Bank presented a disclosure based on data from energy performance certificates and expert determination of the basic non-renewable primary energy demand based on the year of construction of the property and its type (according to the building's intended use), as well as the basic values of the annual primary energy demand counter for individual types of uses, which are based on the year of construction and intended use, Ministry of Development and Technology.

Template 2 presents the gross carrying amount of loans secured by commercial and residential real estate and repossessed real estate security, including information on the energy efficiency level of the security measured in terms of non-renewable primary energy demand in [kWh/(m² · year)] based on the security's energy performance certificate referred to in Article 2(12) of Directive 2010/31/EU. The Bank prepared the disclosure based on data from energy performance certificates and an expert estimate of the average non-renewable primary energy demand based on the year of construction of the property and its type (according to the building's purpose) and the average values of the annual primary energy demand indicator for individual building types depending on the year of construction and purpose from the Ministry of Development and Technology, which is an annex to Resolution No. 23/2022 of the Council of Ministers of February 9, 2022. In the case of buildings constructed after December 31, 2020, the maximum value of the primary energy demand indicator was estimated based on the provisions of the Regulation of the Minister of Infrastructure of April 12, 2002 on the technical conditions to be met by buildings and their location. For some of the exposures, actual values regarding the energy efficiency of security measures were disclosed, collected from customers or obtained from the central register of building energy performance. The bank is gradually increasing the level and accuracy of data in its internal systems.

The table below presents information on the Santander Bank Polska S.A. Group 's portfolio alignment indicators to the global decarbonization goals for 2030 in the Net Zero 2050 scenario defined in the International Energy Agency's (IEA) "Net Zero Roadmap – A Global Pathway to Keep the 1.5 oC Goal in Reach ("World Energy Outlook 2025" - update)" document.

K_43.00 - TEMPLTE 3: BANKING PORTFOLIO - INDICATORS OF POTENCIAL TRANSITION RISK RELATED TO CLIMATE CHANGE- ADJUSTMENT INDICATORS, AS AT 31 DECEMBER 2025 (MLN. EUR)

a	b	c	d	e	f	g
Sector	Sectors NACE (minimum)	Gross carrying amount (Mln EUR)	Adjustment indicator	Reference year	Value missing to reach the target defined in the MAE scenario NZE2050, w %	Target (reference year + 3 years)
1 Energy	35.11	439,66	0,38 t CO2eq / MWh	2024	95,3%	
	35.12	40,11	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	
	35.13	176,61	0,22 t CO2eq / MWh	2024	12,5%	
	35.14	9,79	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	
	27.1 27.2 27.3 27.4 27.5 27.9	162,35	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
	33.1	5,00	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	
	35.3	26,41	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	
	43.2	70,70	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	
2 Fossil fuel combustion	19.2 46.7 20.1 08.1 35.2 09.1 46.1 09.9 06.1 06.2	111,27	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
	29.3 29.1 29.2 28.1	159,71	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
3 Automotive	51.2 51.1 33.1 30.3 52.2	18,45	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
4 Aviation	52.2 50.2 30.1 33.1 50.4 50.1 50.3	145,53	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
5 Maritime transport	23.6 23.5 08.1 08.9	76,79	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
6 Cement, lime and coal production	07.29	361,33	9,88 t CO2eq / t	2024	25,0%	
7 Iron and steel, coke and metal ore production	25.1 25.6 25.9 25.7 25.2 25.4 25.5 25.3	502,99	6,30 t CO2eq / t	2024	25,0%	
	24.5 24.1 24.4 24.3 24.2	55,23	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
	46.7	10,99	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	
	20.1 20.5 20.4 20.3 20.2 20.6	217,61	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - sector with a share below 2% of the total portfolio	n/a - none
8 Chemicals						

As at 31 December 2025, the Group had not yet defined its business decarbonisation targets. Column F shows the value missing as at the reporting date to achieve the data points set for 2030 in the NZE2050 scenario, in % (for each indicator).

This disclosure applies only to high-emission sectors specified in the rows of the above disclosure template (the so-called 'IAE sectors') and thus applies only to 14.6% of the total exposure of Santander Bank Polska S.A. Group to non-financial companies.

Due to the significant operational challenges associated with obtaining reliable source data for calculating the alignment indicators, it was assumed that the alignment indicators are determined only for those MEA sectors where exposure exceeds 2% of the total exposure to non-financial corporations.

Therefore, Santander Bank Polska S.A. Group has determined adjustment indicators for the following IEA sectors:

- "Energy" (under NACE codes 35.11 and 35.13);
- "Production of iron and steel, coke and metal ores" (under NACE codes 07.29 and NACE code group 25).

The adjustment indicators in the "Energy" sector were determined as the gross balance sheet value-weighted average greenhouse gas emission intensity per MWh of electricity produced. For targeted financing of solar and wind energy, an emission intensity of zero was assumed. For other exposures, the greenhouse gas and energy production volumes disclosed by customers or the emission intensity published by KOBiZE in its document "Emission Indicators for Electricity for 2024, published in December 2025" were used. The global decarbonization target for 2030 comes directly from the IEA publication mentioned above.

The adjustment indicator for the "Production of iron and steel, coke and metal ores" sector under NACE code "07.29 Mining of other non-ferrous metal ores" was estimated based on information published by the reference market-leading Polish capital group engaged in

non-ferrous metal mining and smelting. In turn, the adjustment indicator for NACE code group 25 (activities related to the production of various types of metal objects) was estimated based on the average carbon intensity of enterprises financed by the Group (using PCAF indicators) and the average volume of metal product production per enterprise based on data from the Central Statistical Office. The IEA does not explicitly provide a 2030 decarbonization target for these industries. Based on the assumptions described by the IEA for heavy industry in the document Net Zero Roadmap – A Global Pathway to Keep the 1.5 oC Goal in Reach (“World Energy Outlook 2025” - update)”, it was assumed that the 2030 target assumes a 20% emission reduction compared to the base year.

K_45.00 - TEMPLATE 5: BANKING BOOK - CLIMATE CHANGE PHYSICAL RISK: EXPOSURES SUBJECT TO PHYSICAL RISK, AS AT 31 DECEMBER 2025 (MLN. EUR)

Variable: Geographical area subject to climate change physical risk - acute and chronic events	Gross carrying amount (Mln EUR)												
	Of which exposures sensitive to impact from climate change physical events											Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions	
	Breakdown by maturity classes					Average weighted maturity	of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	of which Stage 2 exposures	Of which non-performing exposures
	<= 5 lat	> 5 lat <= 10 lat	> 10 lat <= 20 lat	> 20 lat									
A - Agriculture, forestry and fishing	99	0	0	0	0	0	0	0	0	0	0	0	0
B - Mining and quarrying	379	0	0	0	0	0	0	0	0	0	0	0	0
C - Manufacturing	2 426	0	0	0	0	0	0	0	0	0	0	0	0
D - Electricity, gas, steam and air conditioning supply	680	0	0	0	0	0	0	0	0	0	0	0	0
E - Water supply; sewerage, waste management and remediation activities	133	0	0	0	0	0	0	0	0	0	0	0	0
F - Construction	880	0	0	0	0	0	0	0	0	0	0	0	0
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	2 591	0	0	0	0	0	0	0	0	0	0	0	0
H - Transportation and storage	874	0	0	0	0	0	0	0	0	0	0	0	0
L - Real estate activities	476	0	0	0	0	0	0	0	0	0	0	0	0
Loans collateralised by residential immovable property	12 569	17	51	231	358	20	0	657	0	0	0	0	0
Loans collateralised by commercial immovable property	6 559	221	62	21	2	4	0	307	0	0	-29	-1	-26
Reposessed collaterals	0	0	0	0	0	0	0	0	0	0	0	0	0
Other relevant sectors (breakdown below where relevant)	3 121	0	0	0	0	0	0	0	0	0	0	0	0

In Template 5, the Bank presents information on banking book exposures (including loans and advances, debt securities, and equity instruments) to non-financial corporations and loans secured by real estate, which are sensitive to the impact of both long-term and acute climate change-related risks. Data is presented by economic activity sector (NACE) and by geographic area in which the counterparty is registered or where the collateral is located. The Bank identifies exposures sensitive to physical risk based on data on physical risk factors provided by external providers. For loans and advances secured by mortgages on real estate and reposessed collateral, the Bank collects data on the collateral's location and matches it to individual climate risks using hazard maps. Due to limited availability of information on the precise coordinates of the company's operations, the company's registered office address was used in the data disclosed in the above template.

Template 4 concerns engagement with the world's 20 largest carbon emissions companies and entities within their capital groups. For this purpose, the Bank used the Carbon Majors Database 2024 report, updated in January 2026. The Bank analysed its exposures to the entities included in the above-mentioned list, as well as to their subsidiaries, identified on the basis of consolidated financial statements. As a result of the analysis, as at 31 December 2025, no significant exposure to the indicated companies (PLN 1.5k) was identified, and therefore the Bank does not present Template 4.

XII. Events after the reporting date

On May 5, 2025, Banco Santander S.A. published an announcement informing about an agreement to conclude a transaction between Erste Group Bank AG (Erste Group) and Banco Santander S.A. (Santander Group) was published, pursuant to which the Erste Group planned to acquire from the Santander Group: 49% of the shares in Santander Bank Polska S.A. and 50% of the shares in Santander Towarzystwo Funduszy Inwestycyjnych S.A. (Santander TFI S.A.).

Santander Bank Polska S.A. announced that on 9 January 2026 it received:

- from shareholder Erste Group Bank AG, notification of the acquisition from Banco Santander, S.A. of shares representing approx. 49% of the total number of votes in the Bank, and
- from Banco Santander, S.A. shareholder, a notification of a change in the share in the total number of votes in the Bank.

As of the date of preparation of this document, in connection with ownership changes, the Santander Bank Polska S.A. Group identified an exceedance of the regulatory large exposure limit to the parent entity, which until January 9, 2026, was Banco Santander S.A. The Santander Bank Polska S.A. Group is taking appropriate actions to eliminate the exceedance.

On 14 Jan 2026 Fitch Ratings has affirmed Santander Bank Polska S.A. Long-Term Issuer Default Rating (IDR) at 'A-' and Shareholder Support Rating(SSR) at 'a-' and removed the ratings from Rating Watch Negative (RWN).

In a statement dated February 2, 2026, Moody's Ratings announced the maintenance of all assessments and ratings of Santander Bank Polska S.A. The outlook for long-term deposit ratings remained stable. According to the statement, the BCA credit rating – confirmed by Moody's at baa2 – reflects the Bank's strong revenues from core activities and solid capital buffers.

Statement of the Management Board of Santander Bank Polska S.A.

The Management Board of Santander Bank Polska S.A. discloses information required by Part Eight of the CRR in accordance with adopted policies and internal procedures, as well as control systems and mechanisms that verify whether the disclosure of information is carried out in an appropriate manner and in accordance with the requirements set out in the CRR.

The Management Board of Santander Bank Polska S.A. declares that, to the best of its knowledge, the arrangements contained in this "Information on Capital Adequacy of Santander Bank Polska S.A. Group as at 31 December 2025" give a true view of the facts, while the risk management arrangements, notably with regard to liquidity risk, give assurance that the risk management systems in use are appropriate in terms of the risk profile and strategy of the Bank's Group.

The Management Board of Santander Bank Polska S.A. approves this "Information on Capital Adequacy of Santander Bank Polska S.A. Group as at 31 December 2025", which contains details about risks, discusses the general risk profile of the Bank and the Bank's Group associated with the business strategy, and includes key metrics and figures that provide external stakeholders with a comprehensive view of risk management by the Bank's Group, including interaction between the Bank's risk profile and risk appetite expressed in the form of strategic risk tolerance limits, as determined by the Management Board and approved by the Supervisory Board.