

Disclosures regarding capital adequacy of mBank S.A. Group as at 30 September 2025



Warsaw, 13th November 2025

Contents

1.	Introduction	3
2.	Scope of prudential consolidation.....	4
3.	Own funds	5
4.	Capital requirement.....	8
4.1	<i>Assessment of adequacy of internal capital – description of the approach</i>	<i>8</i>
4.2	<i>Results of the internal capital adequacy assessment</i>	<i>9</i>
4.3	<i>Supervisory requirements regarding capital ratios</i>	<i>9</i>
4.4	<i>Quantitative data regarding capital adequacy</i>	<i>10</i>
5.	Liquidity risk.....	15

1. Introduction

This document is issued under the disclosure requirements resulting from Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012, as amended (the CRR Regulation), which was applicable as at the reporting date i.e. 30 September 2025.

This document contains information on the prudential consolidated basis of the mBank S.A. Capital Group (mBank Group) in accordance with the requirements set out in Article 13 of the CRR Regulation. The information is published in accordance with the following provisions:

- 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 (Regulation 2024/3172),
- Guidelines EBA/GL/2014/14 of 23 December 2014 on materiality, proprietary and confidentiality and on disclosure frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) No 575/2013,
- Disclosure Policy of mBank S.A. on capital adequacy available on website www.mbank.pl.

If not stated specifically further in the document, all amounts are presented in PLN thousand.

2. Scope of prudential consolidation

According to the CRR Regulation, mBank S.A. (mBank) as a large subsidiary of an EU parent institution discloses information about the capital adequacy on a sub-consolidated basis at the highest local level of prudential consolidation i.e. based on the data of mBank Group.

In the prudential consolidation process, the same accounting principles were applied as those used in preparing the mBank S.A. Group Consolidated Financial Report for the third quarter of 2025, which includes Condensed Consolidated Financial Statements of mBank S.A. Group for the third quarter of 2025, with exceptions of consolidation rules described below.

Entities included in prudential consolidation were taken into account in the process of calculation of consolidated own funds and consolidated own funds requirements as at 30 September 2025 in accordance with the CRR Regulation.

Entities included in prudential consolidation are defined in the CRR Regulation as institutions, financial institutions or ancillary services undertakings, which are subsidiaries or undertakings in which a participation is held, except for entities in which the total amount of assets and off-balance sheet items of the undertaking concerned is less than the smaller of the following two amounts:

- EUR 10 million;
- 1% of the total amount of assets and off-balance sheet items of the parent undertaking or the undertaking that holds the participation.

The prudentially consolidated financial data as at 30 September 2025 include the following entities:

1. mBank S.A.
2. mBank Hipoteczny S.A.
3. mFaktoring S.A.
4. mFinanse S.A.
5. mFinanse CZ s.r.o.
6. mFinanse SK s.r.o.
7. mLeasing Sp. z o.o.
8. mElements S.A.
9. Asekum Sp. z o.o.
10. LeaseLink Sp. z o.o.
11. mTowarzystwo Funduszy Inwestycyjnych S.A.
12. mZakupy Sp. z o.o.

Detailed information on consolidated entities included in consolidation is presented in mBank S.A. Group Consolidated Financial Report for the third quarter of 2025, in the Note 1 Information regarding the Group of mBank S.A.

The scope of entities included in prudential consolidation for the third quarter of 2025 was the same as the scope of entities included in accounting consolidation based on International Financial Reporting Standards (IFRS).

3. Own funds

The consolidated own funds of mBank Group consist of Common Equity Tier 1 capital, Additional Tier 1 capital and Tier 2 capital.

The increase in own funds observed during the third quarter of 2025 compared to the level of own funds as of June 30, 2025, was primarily due to the classification of subordinated bonds issued on June 25, 2025, with a nominal value of EUR 400 million, as Tier II capital instruments, in accordance with the decision of the Polish Financial Supervision Authority (KNF) dated August 29, 2025, as well as the inclusion of the profit for the second quarter of 2025 following the approval granted by the KNF, as referred to in Article 26(2) of the CRR Regulation. These changes were partially offset by the decision to early redeem subordinated bonds of series MBKO101030 issued on October 9, 2018, with a total nominal value of PLN 200 million, and by the prudential amortization of the value of other financial instruments classified as Tier II capital.

EU KM1 – Key metrics template, addressing disclosure requirements of Article 447 (a) to (g) and Article 438 (b)

		a	b	c	d	e
		30.09.2025	30.06.2025	31.03.2025	31.12.2024	30.09.2024
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	16 094 337	15 181 647	14 499 548	13 343 086	13 429 261
2	Tier 1 capital	17 594 337	16 681 647	15 999 548	14 843 086	13 429 261
3	Total capital	20 208 513	17 864 931	17 249 190	16 201 233	14 929 042
	Risk-weighted exposure amounts					
4	Total risk exposure amount	121 130 820	119 056 148	112 376 374*	102 215 740	96 941 573
4a	Total risk exposure pre-floor	121 130 820	119 056 148	112 376 374*		
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	13.29%	12.75%	12.90%	13.05%	13.85%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	13.29%	12.75%	12.90%		
6	Tier 1 ratio (%)	14.53%	14.01%	14.24%	14.52%	13.85%
6b	Tier 1 ratio considering unfloored TREA (%)	14.53%	14.01%	14.24%		
7	Total capital ratio (%)	16.68%	15.01%	15.35%	15.85%	15.40%
7b	Total capital ratio considering unfloored TREA (%)	16.68%	15.01%	15.35%		
	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 (%)	-	-	-	-	-
EU-7e	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU-7f	of which: to be made up of Tier 1 capital (percentage points)	-	-	-	-	-
EU-7g	Total SREP own funds requirements (%)	8.00%	8.00%	8.00%	8.00%	8.00%
	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 (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	1.01%	0.08%	0.08%	0.09%	0.09%
EU-9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU-10a	Other Systemically Important Institution buffer (%)	0.50%	0.50%	0.50%	0.50%	0.50%
11	Combined buffer requirement (%)	4.01%	3.08%	3.08%	3.09%	3.09%
EU-11a	Overall capital requirements (%)	12.01%	11.08%	11.08%	11.09%	11.09%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.53%	7.01%	7.35%	7.85%	7.40%
	Leverage ratio					
13	Total exposure measure	285 241 160	279 808 594	264 039 199	262 882 185	254 430 697
14	Leverage ratio (%)	6.17%	5.96%	6.06%	5.65%	5.28%
	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 (%)	-	-	-	-	-
EU-14b	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
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 (%)	-	-	-	-	-
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)	94 117	91 867	89 097	86 562	84 444
EU-16a	Cash outflows - Total weighted value	43 895	42 948	42 231	41 403	40 639
EU-16b	Cash inflows - Total weighted value	2 606	2 557	2 569	2 397	2 559
16	Total net cash outflows (adjusted value)	41 289	40 391	39 662	39 006	38 080
17	Liquidity coverage ratio (%)	228%	227%	225%	222%	222%
	Net Stable Funding Ratio					
18	Total available stable funding	200 542	195 072	187 689	187 775	181 022
19	Total required stable funding	124 367	121 514	118 135	114 388	113 766
20	NSFR ratio (%)	161%	161%	159%	164%	159%

*The value as of March 31, 2025, has been adjusted

EU KM1 – Key metrics template recalculated taking into account the retrospective including of the profit (following PFSA approvals), in line with the EBA's position expressed in Q&A 2018_3822 and Q&A 2018_4085.

		a	b	c	d	e
		30.09.2025	30.06.2025	31.03.2025	31.12.2024	30.09.2024
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	16 094 337	16 270 630	15 370 409	14 589 931	14 193 250
2	Tier 1 capital	17 594 337	17 770 629	16 870 409	16 089 931	14 193 250
3	Total capital	20 208 513	18 953 914	18 120 051	17 448 078	15 693 031
	Risk-weighted exposure amounts					
4	Total risk exposure amount	121 130 820	119 056 148	112 376 374	102 430 304	96 941 573
4a	Total risk exposure pre-floor	121 130 820	119 056 148	112 376 374		
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	13.29%	13.67%	13.68%	14.24%	14.64%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	13.29%	13.67%	13.68%		
6	Tier 1 ratio (%)	14.53%	14.93%	15.01%	15.71%	14.64%
6b	Tier 1 ratio considering unfloored TREA (%)	14.53%	14.93%	15.01%		
7	Total capital ratio (%)	16.68%	15.92%	16.12%	17.03%	16.19%
7b	Total capital ratio considering unfloored TREA (%)	16.68%	15.92%	16.12%		
	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 (%)	-	-	-	-	-
EU-7e	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU-7f	of which: to be made up of Tier 1 capital (percentage points)	-	-	-	-	-
EU-7g	Total SREP own funds requirements (%)	8.00%	8.00%	8.00%	8.00%	8.00%
	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 (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	1.01%	0.08%	0.08%	0.09%	0.09%
EU-9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU-10a	Other Systemically Important Institution buffer (%)	0.50%	0.50%	0.50%	0.50%	0.50%
11	Combined buffer requirement (%)	4.01%	3.08%	3.08%	3.09%	3.09%
EU-11a	Overall capital requirements (%)	12.01%	11.08%	11.08%	11.09%	11.09%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.53%	7.92%	8.12%	9.03%	8.19%
	Leverage ratio					
13	Total exposure measure	285 241 160	279 808 594	264 039 199	262 968 011	254 430 697
14	Leverage ratio (%)	6.17%	6.35%	6.39%	6.12%	5.58%
	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 (%)	-	-	-	-	-
EU-14b	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
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 (%)	-	-	-	-	-
EU-14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%

4. Capital requirement

4.1 Assessment of adequacy of internal capital – description of the approach

On 4 July 2012 PFSA and Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) granted consent to the application of the advanced internal rating based approach (AIRB approach) by mBank to the calculation of the capital requirement for credit risk for the corporate portfolio and the retail mortgage loan portfolio.

Additionally, on 27 August 2012 BaFin in cooperation with PFSA granted consent to the application of internal rating based approach concerning the risk weighting for specialized lending exposures (IRB slotting approach) by mBank Hipoteczny S.A. (mBH) to the calculation of the capital requirement for credit risk.

On 6 May 2015 mBank S.A. received conditional consent of PFSA to use AIRB approach for retail mortgage loan portfolio (micro companies) and for the portfolio of commercial banks.

On 25 July 2016 mLeasing S.A. (mLeasing) obtained approval from ECB and PFSA to the application of the AIRB approach to the calculation of capital requirement for credit risk.

On 22 September 2016 mBank S.A. obtained approval from ECB and PFSA to the application of AIRB approach to the calculation of the capital requirement for credit risk for the specialized lending exposures - income producing real estate.

On 31 January 2018 mBank S.A. obtained approval from European Central Bank and PFSA to the application of material change in PD model for subsidiary mLeasing.

On 31 March 2021 mBank obtained approval from PFSA for the use of a new LGD model for retail portfolio.

Starting from the process of the calculation of consolidated total capital ratio as at 30 June 2021 mBank Group implemented PFSA requirements (multipliers) related to the recommendations after the implementation of a New Definition of Default.

On March 24, 2022, mBank concluded a synthetic securitization transaction carried out on a portfolio of corporate loans with a total value of PLN 8 922 million. As part of this transaction, mBank transferred a significant part to the investor credit risk from the selected securitization portfolio. A selected portfolio of the securitized loans remain on the Bank's balance sheet. The risk of a securitized portfolio is transferred through a recognized credit protection instrument in the form of a credit linked note. The transaction meets the requirements set out in the CRR Regulation regarding the transfer of a significant part of the risk and it has been structured as STS-compliant (simple, transparent and standardized securitization) in line with Regulation 2021/557. The capital requirements for the retained securitization positions are calculated under the Securitization Internal Ratings Based Approach (SEC-IRBA).

On 23 December 2022, the Bank concluded a synthetic securitization transaction referencing a portfolio of corporate as well as small and medium enterprises loans with a total value of EUR 801 million of which 55.3% were credit exposures secured on commercial real estate (CRE). As part of the transaction, the Bank transferred a significant part of the credit risk of a selected securitised portfolio to an investor. The risk transfer of the securitised portfolio is performed through a recognised credit protection instrument, in the form of a credit linked notes. The transaction meets the requirements for significant risk transfer specified in the CRR Regulation. Retained securitization positions are subject to the calculation of capital requirements in accordance with the securitization approach based on internal ratings (SEC-IRBA).

On 27 September 2023, the Bank concluded a synthetic securitization transaction referencing a portfolio of retail non-mortgages loans with a total value of PLN 9 963 million. As part of the transaction, the Bank transferred a significant part of the credit risk of a selected securitized portfolio to an investor. The risk transfer of the securitized portfolio is performed through a recognized credit protection instrument, in the form of a credit linked notes. The transaction meets the requirements for significant risk transfer specified in the CRR Regulation and has been structured as meeting the STS criteria (simple, transparent and standardized) in accordance with Regulation 2021/557. Retained securitization positions are subject to the calculation of capital requirements in accordance with the securitization approach based on internal ratings (SEC-IRBA).

On 6 November 2024, mBank concluded a synthetic securitization transaction executed on a portfolio of corporate non-mortgage loans with a total value of PLN 5 237 million as at 30 August 2024. As part of the transaction, the Bank transferred a significant part of the credit risk of a selected securitized portfolio to an investor. The risk transfer of the securitized portfolio is performed through a recognized credit protection instrument in the form of a partially paid credit linked notes. The transaction meets the requirements for significant risk transfer specified in the CRR Regulation and has been structured as meeting the STS criteria (simple, transparent and standardized) in accordance with Regulation 2021/557. Retained securitization positions are subject to the calculation of capital requirements in accordance with the securitization approach based on internal ratings (SEC-IRBA).

On 30 September 2024 mBank obtained approval from PFSA for the use of the new generation of PD, LGD and CCF models for the retail portfolio and the corporate portfolio and the new generation of PD and LGD models for the subsidiary mLeasing.

In the calculation of the total capital ratio of mBank Group as of 30 September 2025, when calculating the total capital charge, the mBank Group applies the IRB approach pursuant to the provisions of the CRR Regulation to calculate a capital charge for credit and counterparty credit risk and pursuant to obtained IRB approvals.

4.2 Results of the internal capital adequacy assessment

The below information addresses the scope of disclosure from table EU OVC – ICAAP Information set out in Annex I to Regulation 2024/3172.

mBank Group adjusts the own funds (both in regulatory and in economic terms) to the level and type of risk, mBank Group is exposed to and to the nature, the scale and the complexity of its operations. For that purpose Internal Capital Adequacy Assessment Process (ICAAP) is realized in mBank Group. The aim of this process is to maintain regulatory own funds (under Pillar I) and own funds under economic perspective (under Pillar II) at the level adequate to the profile and the level of risk in mBank Group's operations.

Capital adequacy is monitored:

- in regulatory terms, with reference to capital ratios, including the leverage ratio (which is described in more detail later in this document); and
- on an economic basis (internal), in relation to calculated internal capital.

Internal capital is the amount of capital estimated by mBank and required to cover all material risks identified in mBank Group's operations. Internal capital is the total sum of the economic capital to cover risks included in economic capital calculation and capital necessary to cover other risks (including hard to quantify risks).

In 2025 mBank calculated the economic capital at the 99.90% confidence level over a one-year time horizon for credit, market and business risk. The economic capital for operational risk was calculated based on the Standardised Measurement Approach (SMA) described in the updated Basel III standard: Finalising post-crisis reforms. Starting from June 2024, mBank included environmental, social and governance risks (ESG risks) in its internal capital calculation. The bank designated capital for other, including hard-to-measure risks. In calculating total internal capital, the Bank did not take into account the effect of diversification between different types of risk.

The internal capital adequacy assessment process runs continuously in mBank Group and includes the following stages implemented by organizational units of mBank and mBank Group subsidiaries:

- risk inventory in mBank Group,
- calculation of internal capital under Pillar II and Pillar I capital requirements to provide for sufficient risk coverage,
- capital aggregation,
- stress tests,
- setting limits on the utilization of capital resources,
- planning and allocation of capital,
- monitoring consisting in a permanent identification of risk involved in the business of mBank Group and the analysis of the level of capital for risk coverage,
- annual process review and assessment.

In order to assess the capital adequacy under economic perspective mBank calculates risk coverage potential (RCP), i.e. economic own funds, in addition to regulatory own funds. Having estimated internal capital as well as RCP both under normal and under stressed conditions Bank determines risk bearing capacity. On this basis and taking into account the forecast values limits for economic capital for particular risks are determined.

Both the value of the regulatory own funds as well as the value of the risk coverage potential in mBank Group are well above the value of the internal capital.

The Bank's Management Board is responsible for the ICAAP process in mBank Group. The main principles of the internal capital adequacy assessment process (ICAAP) are approved by the Supervisory Board of mBank. The whole internal capital adequacy assessment process is reviewed annually. The results of the annual review are reported in a dedicated report which is approved by the Supervisory Board of mBank.

4.3 Supervisory requirements regarding capital ratios

According to provisions of the CRR Regulation the Bank and the mBank Group are required to meet minimum regulatory level of capital ratios, i.e. to maintain a minimum total capital ratio above 8%. Tier 1 capital ratio above 6% and common equity Tier 1 capital ratio above 4.5%.

Provisions of CRD IV, in particular provisions regarding capital buffers, were transposed into a national legislation, which took place in 2015 with the endorsement of the Act on Macro-prudential Supervision over the Financial System and Crisis Management in the Financial System (Act) and with an update of the Banking Law. The act stipulates capital buffers banks in Poland should meet once buffers are implemented by competent authorities indicated in the Act.

As of 30 September 2025 mBank Group was obliged to ensure adequate own funds to meet conservation capital buffer of 2.5% of total risk exposure amount, as defined in the Act.

As of 30 September 2025 the countercyclical capital buffer rate set for relevant exposures in Poland amounted to 1% in accordance with the Regulation of the Minister of Finance dated 18 September 2024 on the countercyclical buffer rate. Until 25 September 2025 the applicable rate amounted to 0%.

Countercyclical capital buffer is calculated in accordance with the provisions of the Act as the weighted average of the countercyclical buffer rates that apply in the countries where the relevant credit exposures of the mBank Group are located. As at the end of September 2025 this ratio amounted to 1.01%.

In addition to exposures located in Poland, exposures of foreign branches in Czech Republic and in Slovakia, where countercyclical buffer rates as of 30 September 2025 amounted to 1.25% and 1.5% respectively, had an impact on the mBank Group specific countercyclical capital buffer.

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

		30.09.2025
1	Total risk exposure amount	121 130 820
2	Institution specific countercyclical capital buffer rate	1.0145%
3	Institution specific countercyclical capital buffer requirement	1 228 872

In 2016 Bank received an administrative decision of the PFSA (KNF), in which mBank has been identified as other systemically important institution (O-SII), mBank was subject to a capital buffer which on the basis of KNF administrative decision of October 29th, 2020 amounted to 0.50% of the total risk exposure amount, calculated in accordance with article 92(3) of CRR Regulation. The amount of the buffer is verified by the KNF on an annual basis. Buffer should be maintained on individual and consolidated levels. The buffer value specified in this decision was in force as at 30 September 2025.

Starting from 1st January 2018 the Regulation of the Minister of Development and Finance with regard to systemic risk buffer entered into force. The Regulation introduced systemic risk buffer of 3% of the total risk exposure amount applied to all exposures located in Poland. Due to the exceptional socio-economic situation that arose after the outbreak of the global COVID-19 pandemic, this requirement was lifted by repealing the Regulation of the Minister of Finance, which was in force since 19 March 2020 and was applied as at 30 September 2025.

Consequently, the combined buffer requirement set for the mBank Group as of the 30 September 2025 amounted to 4.01% of the total risk exposure amount.

Capital ratios both on consolidated and individual basis as at the end of September 2025 were above the required values.

With a surplus mBank Group meets the combined buffer requirement.

4.4 Quantitative data regarding capital adequacy

Capital ratios are calculated on the basis of total risk exposure amount that corresponds to the sum of risk exposure amounts for particular risk types that are calculated according to provisions of the CRR Regulation.

Total risk exposure amount of mBank Group consists of:

- risk weighted exposure amount for credit risk, counterparty credit risk, securitization transactions, dilution risk and free deliveries calculated under IRB approach as regards the large part of the credit exposures portfolio,
- risk exposure amount for market risk, including position risk, foreign exchange risk and commodities risk calculated under standardised approaches,
- risk exposure amounts for operational risk,
- risk exposure amount for credit valuation adjustments, calculated under basic approach,
- other risk exposure.

The template presents all components of the total risk exposure amount of mBank Group, a denominator for capital ratios calculated according with art. 92 of CRR Regulation regard to template EU OV1 in Annex I to Regulation 2024/3172 addressing disclosure requirements of Article 438 (d) of the CRR Regulation.

EU OV1 - Overview of RWAs

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		30.09.2025	30.06.2025	30.09.2025
1	Credit risk (excluding CCR)	95 684 242	92 938 893	7 654 739
2	Of which the standardised approach	30 799 783	30 623 310	2 463 983
3	Of which the Foundation IRB (F-IRB) approach	2 060 242	1 952 834	164 819
4	Of which slotting approach	6 856 841	7 380 134	548 547
EU 4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	55 967 376	52 982 615	4 477 390
6	Counterparty credit risk - CCR	1 443 439	1 436 262	115 475
7	Of which the standardised approach	1 238 460	1 252 010	99 077
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	3 536	4 065	283
9	Of which other CCR	201 443	180 187	16 115
10	Credit valuation adjustments risk - CVA risk	233 152	203 876	18 652
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	233 152	203 876	18 652
EU 10c	Of which the simplified approach	-	-	-
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	4 951 869	5 712 780	396 150
17	Of which SEC-IRBA approach	4 951 869	5 712 780	396 150
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	-	-	-
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	1 100 820	1 047 039	88 066
21	Of which the Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S-SA)	1 100 820	1 047 039	88 066
22	Of which Alternative Internal Model Approach (A-IMA)	-	-	-
EU 22a	Large exposures	-	-	-
23	Reclassifications between the trading and non-trading books	-	-	-
24	Operational risk	17 717 298	17 717 298	1 417 384
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	3 318 018	3 632 054	265 441
26	Output floor applied (%)	50%	50%	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	Total	121 130 820	119 056 148	9 690 466

The templates present comparison of modelled and standardised risk weighted exposure amounts of mBank Group regard to templates EU CMS1 and EU CMS2 in Annex I to Regulation 2024/3172 addressing disclosure requirements of Article 438 (da) of the CRR Regulation.

EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

		a	b	c	d	EU d
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	64 884 459	30 799 783	95 684 242	106 649 759	104 169 914
2	Counterparty credit risk	829 902	613 537	1 443 439	1 596 717	1 596 717
3	Credit valuation adjustment		233 152	233 152	233 152	233 152
4	Securitisation exposures in the banking book	4 951 869	-	4 951 869	3 513 560	3 513 560
5	Market risk	-	1 100 820	1 100 820	1 100 820	1 100 820
6	Operational risk		17 717 298	17 717 298	17 717 298	17 717 298
7	Other risk weighted exposure amounts		-	-	-	-
8	Total	70 666 230	50 464 590	121 130 820	130 811 306	128 331 461

EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level

		a	b	c	d	EU d
Risk weighted exposure amounts (RWEAs)						
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Central governments and central banks	-	14 665	2 899 403	2 914 068	2 914 068
EU 1a	Regional governments or local authorities	-	-	9 088	9 088	9 088
EU 1b	Public sector entities	-	4	16 013	16 017	16 017
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	940 700	985 689	1 219 812	1 264 801	1 264 801
3	Equity	-	-	957 242	957 242	957 242
5	Corporates	24 467 621	23 752 987	39 059 101	40 222 952	38 344 466
5.1	Of which: F-IRB is applied	990 879	1 345 347	990 879	1 461 041	1 345 347
5.2	Of which: A-IRB is applied	23 476 742	22 407 640	23 476 742	24 170 432	22 407 640
EU 5a	Of which: Corporates - General	24 358 476	23 649 928	34 459 497	35 629 435	33 750 949
EU 5b	Of which: Corporates - Specialised lending	109 145	103 059	4 599 604	4 593 517	4 593 517
EU 5c	Of which: Corporates - Purchased receivables	-	-	-	-	-
6	Retail	16 614 573	22 326 270	21 574 012	27 285 709	27 285 709
6.1	Of which: Retail - Qualifying revolving	2 658 127	3 523 345	2 658 127	3 523 345	3 523 345
EU 6.1a	Of which: Retail - Purchased receivables	-	-	-	-	-
EU 6.1b	Of which: Retail - Other	13 953 967	10 481 700	13 953 967	15 441 139	18 802 925
6.2	Of which: Retail - Secured by residential real estate	2 479	8 321 225	2 479	8 321 225	8 321 225
EU 7a	Categorised as secured by immovable properties and ADC exposures in SA	13 779 502	20 246 390	20 156 992	27 225 239	26 623 880
EU 7b	Collective investment undertakings (CIU)	-	-	-	-	-
EU 7c	Categorised as exposures in default in SA	4 731 881	1 956 532	5 181 423	2 406 075	2 406 075
EU 7d	Categorised as subordinated debt exposures in SA	-	-	-	-	-
EU 7e	Categorised as covered bonds in SA	-	-	-	-	-
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-
8	Other non-credit obligation assets	4 350 182	4 087 594	4 611 156	4 348 568	4 348 568
9	Total	64 884 459	73 370 131	95 684 242	106 649 759	104 169 914

EU CR8 – RWA flow statements of credit risk exposures, including IRB approach, addressing disclosure requirements of Art. 438 letter h) of CRR Regulation.

		Risk weighted exposure amount
		30.09.2025
1	Risk weighted exposure amount as at the end of the previous reporting period	52 481 200
2	Asset size (+/-)	2 665 310
3	Asset quality (+/-)	(152 063)
4	Model updates (+/-)	-
5	Methodology and policy (+/-)	-
6	Acquisitions and disposals (+/-)	-
7	Foreign exchange movements (+/-)	65 532
8	Other (+/-)	5 574 899
9	Risk weighted exposure amount as at the end of the reporting period	60 634 878

5. Liquidity risk

The below table addresses the scope of disclosures from EU LIQB table.

As of September 30, 2025, the LCR of mBank Group reached 224% and the LCR measure remained on a safe level, significantly exceeding 100%.

In the third quarter of 2025, the slight decrease in the net outflow coverage ratio and the maintenance of a stable liquidity position were primarily driven by:

- an increase in the deposit base included in the LCR calculation by PLN 8.6 billion compared to the end of Q2 2025 (PLN 8.1 billion excluding FX effects), at simultaneous increase of outflows from deposits by approx. PLN 2.9 billion,
- an increase in lending activity by PLN 3.4 billion compared to the end of Q2 2025 (PLN 3.1 billion excluding FX effects),
- decision to early redeem Tier 2 subordinated bonds in the amount of PLN 200 million,
- repayment of maturing mortgage bonds of EUR 300 million (approx. PLN 1.3 billion).

As of September 30, 2025, the liquidity buffer remained high relative to expected net outflows over a 30-day horizon.

The high-quality liquid assets of mBank in the liquidity buffer (HQLA) used to calculate the LCR ratio consisted exclusively of Level 1 assets and included at the end of Q3 2025:

- Polish government bonds and treasury bills in PLN, EUR and USD,
- bills issued by the National Bank of Poland,
- government bonds and treasury bills issued by EU member states in EUR and by the U.S. government in USD,
- bonds issued by the European Investment Bank in PLN and USD,
- European Union bills in EUR,
- government-guaranteed bonds from the Polish Development Fund and Bank Gospodarstwa Krajowego in PLN and EUR,
- excess of the required reserve in the National Bank of Poland, the Czech National Bank and the National Bank of Slovakia,
- funds held at central banks in the form of deposits and reverse repo operations.

Within the mBank Group, mBank Hipoteczny also maintains liquidity buffer, consisting of Polish government bonds in PLN, NBP bills, and the excess of the required reserve at the National Bank of Poland.

The main source of financing are deposits, which as of September 30, 2025 accounted for 92.67% of all external sources of financing. The deposit base is diversified, and the deposits of the 10 largest customers as of September 30, 2025 accounted for 2.2% of the deposit base. The other sources of financing are:

- own issuances,
- subordinated liabilities,
- operations on the interbank market,
- loans.

The mBank Group identifies three significant currencies in accordance with Art. 4(5) of the EU Commission Delegated Regulation 2015/61 and with Art. 415(2) of the CRR Regulation: PLN, CZK and EUR, for which the LCR ratio was above 100%. CZK and EUR currencies are related to running two foreign branches in the Czech Republic and Slovakia. The currency mismatch is limited at the level of the real liquidity gap in individual currencies.

As of September 30, 2025, the impact of the adverse market scenario on derivatives accounted for 0.30% of the total unweighted outflow value included in the LCR.

EU LIQ1 – Quantitative information of LCR, addressing disclosure requirements of art. 451a point 2) of CRR Regulation (in PLN million)

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	30.09.2025	30.06.2025	31.03.2025	31.12.2024	30.09.2025	30.06.2025	31.03.2025	31.12.2024
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)					94 117	91 867	89 097	86 562
2	Retail deposits and deposits from small business customers, of which:	141 576	138 271	134 775	131 745*	10 560	10 286	10 095	9 948
3	Stable deposits	103 288	100 450	96 990	94 027*	5 164	5 022	4 849	4 701
4	Less stable deposits	38 288	37 821	37 785	37 718*	5 396	5 264	5 246	5 247
5	Unsecured wholesale funding	59 019	57 599	56 688	55 904*	26 298	25 450	25 009	24 416
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	8 176	8 183	8 058	7 940*	1 959	1 961	1 932	1 904
7	Non-operational deposits (all counterparties)	50 412	49 172	48 376	47 818*	23 908	23 245	22 823	22 366
8	Unsecured debt	431	244	254	146*	431	244	254	146
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	30 277	27 878	25 532	23 712	4 121	4 175	4 269	4 362
11	Outflows related to derivative exposures and other collateral requirements	1 539	1 654	1 842	2 067	1 539	1 654	1 842	2 067
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	28 738	26 224	23 690	21 645	2 582	2 521	2 427	2 295
14	Other contractual funding obligations	2 426	2 540	2 259	2 007	2 056	2 179	1 919	1 692
15	Other contingent funding obligations	14 682	16 831	18 579	19 632	860	858	939	985
16	TOTAL CASH OUTFLOWS					43 895	42 948	42 231	41 403
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	16 700	16 412	15 571	14 432	-	-	-	-
18	Inflows from fully performing exposures	2 982	2 909	2 843	2 645	1 981	1 908	1 848	1 643
19	Other cash inflows	625	650	721	754	625	649	721	754
EU-19a	(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)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	TOTAL CASH INFLOWS	20 307	19 971	19 135	17 831	2 606	2 557	2 569	2 397
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	20 307	19 971	19 135	17 831	2 606	2 557	2 569	2 397
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					94 117	91 867	89 097	86 562
22	TOTAL NET CASH OUTFLOWS					41 289	40 391	39 662	39 006
23	LIQUIDITY COVERAGE RATIO					228%	227%	225%	222%

*The values as of December 31, 2024, have been adjusted

Representation of the Management Board of mBank S.A.

The Management Board of mBank S.A. declares that, to the best of its knowledge, the information presented in this "Disclosures regarding capital adequacy of mBank S.A. Group as at 30 September 2025" were prepared in accordance with the formal policies and internal processes, as well as, systems and controls agreed upon at the Management Board level, and give a true view of the facts. Furthermore, the risk management arrangements are adequate and give assurance that the risk management systems in use are appropriate in terms of the risk profile and strategy of the mBank Group.

The Management Board of mBank S.A. approves this "Disclosures regarding capital adequacy of mBank S.A. Group as at 30 September 2025".

First and last name	Position	Signature
Cezary Kocik	President of the Management Board	(signed electronically)
Krzysztof Bratos	Vice-President of the Management Board, Head of Retail Banking	(signed electronically)
Krzysztof Dąbrowski	Vice-President of the Management Board, Head of Operations and IT	(signed electronically)
Marek Lusztyn	Vice-President of the Management Board, Chief Risk Officer	(signed electronically)
Julia Nusser	Vice-President of the Management Board, Chief People & Regulatory Officer	(signed electronically)
Adam Pers	Vice-President of the Management Board, Head of Corporate & Investment Banking	(signed electronically)
Pascal Ruhland	Vice-President of the Management Board, Chief Financial Officer	(signed electronically)