

**Disclosures regarding capital adequacy of
mBank S.A. Group
as at 31 December 2025**



Warsaw, 24 February 2026

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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. 31 December 2025.

This document contains information on the prudential consolidation basis of the mBank S.A. Capital Group (mBank Group) in accordance with the requirements set out in Article 13 of the CRR Regulation. With the exception described below, 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 www.mbank.pl

On May 22nd, 2025, the European Banking Authority (EBA) published a Consultation Paper Draft Implementing Technical Standards amending Commission Implementing Regulation (EU) 2024/3172, as regards the disclosures on ESG risks, equity exposures and the aggregate exposure to shadow banking entities. The consultation document contains proposal to postpone the obligation to disclose environmental, social and governance risks (ESG risks) until the end of 2026, while significantly limiting the scope of these disclosures compared to the requirements that came into force in 2025. To prevent unintended disclosure obligations, particularly for institutions that have not previously been subject to Pillar 3 ESG disclosure obligations, and to support consistent and proportionate implementation across the sector, the EBA has advised in the consultation paper that the current requirements in this area should not be applied until the new provisions come into force. This position was further confirmed in the Opinion of the European Banking Authority on the application of the provisions relating to disclosures on ESG risks dated 5 August 2025.

Based on this position and considering the scope of the proposed changes and simplifications in the required disclosures, mBank has decided to adopt the solution proposed by the EBA and, during the transitional period, will not disclose the information currently required under Article 449a regarding ESG risks.

If not stated specifically further in the document, all amounts are presented in PLN thousand. Due to the presentation of data in thousands of PLN, there may be instances of mathematical inconsistencies in summations or discrepancies between individual tables.

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.

The mBank Group's prudentially consolidated financial data for the year 2025 prepared in accordance with the CRR Regulation (Prudentially Consolidated Financial Data 2025) are presented in Note 47 to the mBank S.A. Group Consolidated IFRS Financial Statements 2025 (Consolidated Financial Statements for the year 2025), approved on 24th February 2026.

The accounting policies applied for the preparation of the Prudentially Consolidated Financial Data 2025 are the same as those, which have been applied to prepare the mBank S.A. Group Consolidated Financial Statement for the year 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 31 December 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 for the year 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 Statements for the year 2025, in the Note 1 Information regarding the Group of mBank S.A.

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

3. Capital adequacy

One of the Bank's main tasks is to ensure an adequate level of capital. As part of the capital management strategy of mBank Group, the Bank creates a framework and guidelines for the effective planning and use of capital base which:

- are compliant with external and internal regulations in force,
- guarantee a continuity of financial targets achievement, which render an appropriate rate of return for shareholders,
- ensure the maintenance of a strong capital basis being a fundamental support for business development.

The capital management strategy in mBank Group is based on two pillars:

- aiming at optimal level and structure of own funds, assuring capital adequacy above the capital strategic targets (established above minimum requirement taking into account the risk appetite at approved level) as well as ensuring coverage against all material risks identified in mBank Group's activity,
- effective use of the capital base, guaranteeing achievement of expected returns, including return on regulatory capital and IFRS equity and thus creating stable basis for strengthening capital in future periods.

Above pillars of the capital management allows to maintain business development while meeting the supervisory requirements in the long perspective.

4. Own funds

The consolidated own funds of mBank Group consist of Common Equity Tier 1 capital, Additional Tier 1 capital and Tier 2 capital. Detailed information on particular elements of consolidated own funds of mBank Group as at 31 December 2025 is presented below on the basis of the templates EU CC1 and EU CC2 set out in Annex I to Regulation 2024/3172.

Template EU CC1 - Composition of regulatory own funds

		a)	b)
		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	3 637 446	Template EU CC2: Shareholders' Equity, row 1 and 2, column b)
2	Retained earnings	2 589 819	Template EU CC2: Shareholders' Equity, row 3, column b)
3	Accumulated other comprehensive income (and other reserves)	8 984 452	Template EU CC2: Shareholders' Equity, row 3 and 5, column b)
EU-3a	Funds for general banking risk	1 153 753	Template EU CC2: Shareholders' Equity, row 3, column b)
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	2 502 051	Template EU CC2: Shareholders' Equity, row 4, column b)
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	18 867 521	-
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	(41 661)	-
8	Intangible assets (net of related tax liability) (negative amount)	(1 444 627)	Template EU CC2: Assets, row 8, column b)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	18 384	Template EU CC2: Shareholders' Equity, row 5, column b)
12	Negative amounts resulting from the calculation of expected loss amounts	(310 392)	-
EU-20a	Exposure amount of the following items which qualify for a RW of 1 250%, where the institution opts for the deduction alternative	(30 444)	-
EU-20c	of which: securitisation positions (negative amount)	(30 444)	-
27a	Other regulatory adjustments	(341 067)	Template EU CC2: Liabilities, row 1, column b)
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(2 149 807)	-
29	Common Equity Tier 1 (CET1) capital	16 717 713	-
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	1 500 000	Template EU CC2: Shareholders' Equity, row 6, column b)
31	of which: classified as equity under applicable accounting standards	1 500 000	-
36	Additional Tier 1 (AT1) capital before regulatory adjustments	1 500 000	-
Additional Tier 1 (AT1) capital: regulatory adjustments			
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	-
44	Additional Tier 1 (AT1) capital	1 500 000	-
45	Tier 1 capital (T1 = CET1 + AT1)	18 217 713	-
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	2 520 897	Template EU CC2: Liabilities, row 2e, column b)
51	Tier 2 (T2) capital before regulatory adjustments	2 520 897	-
Tier 2 (T2) capital: regulatory adjustments			
57	Total regulatory adjustments to Tier 2 (T2) capital	-	-
58	Tier 2 (T2) capital	2 520 897	-
59	Total capital (TC = T1 + T2)	20 738 610	-
60	Total Risk exposure amount	126 885 115	-
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	13.18%	-
62	Tier 1 capital	14.36%	-
63	Total capital	16.34%	-
64	Institution CET1 overall capital requirements	8.52%	-
65	of which: capital conservation buffer requirement	2.50%	-
66	of which: countercyclical capital buffer requirement	1.02%	-
67	of which: systemic risk buffer requirement	-	-
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0.50%	-
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	-	-
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	8.34%	-
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)	57 264	Template EU CC2: Assets, row 3a, column b)
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)	255 401	Template EU CC2: Assets, row 3a, column b)
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)	1 326 537	Template EU CC2: Assets, row 11, column b)
Applicable caps on the inclusion of provisions in Tier 2			
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	402 196	

COMMON EQUITY TIER 1 CAPITALCapital instruments and the related share premium accounts

In the item Capital instruments and the related share premium accounts, the share capital and share premium capital from sales of shares over the nominal value of mBank Group prudentially consolidated were included as at 31 December 2025.

Capital instruments and the related share premium accounts	
Registered share capital	170 103
Capital instruments not eligible	(115)
Share premium	3 467 458
Total	3 637 446

Detailed information on share and supplementary capital from sales of shares over the nominal value is described in Explanatory Notes 37 and 38 of the Consolidated Financial Statements for the year 2025.

Retained earnings

Retained earnings item, amounting to PLN 2 589 819 thousand include the undistributed retained earnings of the prudentially consolidated mBank Group as of 31 December 2025.

Accumulated other comprehensive income (and other reserves)

Accumulated other comprehensive income as at 31 December 2025 amounted to PLN -27 224 thousand. The structure of accumulated other comprehensive income of mBank is presented below.

Accumulated other comprehensive income	
Exchange differences on translation of foreign operations	(31 583)
Cash flow hedges	(18 384)
Valuation of debt instruments at fair value through other comprehensive income	48 338
Actuarial gains and losses related to post-employment benefits	(25 595)
Total	(27 224)

Other reserves of mBank Group prudentially consolidated as at 31 December 2025 amounted to PLN 9 011 676 thousand. The structure of other reserves of mBank Group prudentially consolidated as at 31 December 2025 is presented below.

Other reserves	
Other supplementary capital	8 897 223
Other reserve capital	114 453
Total	9 011 676

Accumulated other comprehensive income and other reserves of mBank Group prudentially consolidated as at 31 December 2025 amounted to PLN 8 984 452 thousand.

Funds for general banking risk

mBank Group transfers some of its net profit to the funds for general banking risk to cover unexpected risk and future losses. The funds for general banking risk can be distributed only on consent of shareholders at the General Meeting. As at 31 December 2025 the funds for general banking risk of mBank Group prudentially consolidated amounted to PLN 1 153 753 thousand.

Independently reviewed interim profits net of any foreseeable charge or dividend

Independently reviewed interim profits net of any foreseeable charge or dividend, amounting to PLN 2 502 051 thousand, includes the recognized net profit of the mBank Group prudentially consolidated for the first three quarters of 2025.

THE COMMON EQUITY TIER 1 CAPITAL: REGULATORY ADJUSTMENTSAdditional value adjustments

In accordance with Article 34 of the CRR Regulation, additional value adjustments have been calculated to all assets measured at fair value in accordance with the requirements of Article 105 of the CRR Regulation and included in Common Equity Tier 1 capital of mBank Group prudentially consolidated as at 31 December 2025 in the amount of PLN -41 661 thousand.

Intangible assets

Adjustments relating to intangible assets were calculated in accordance with Articles 36 and 37 of the CRR Regulation and in accordance with Article 13a of the Commission Delegated Regulation (EU) No 241/2014 of 7 January 2014 supplementing the CRR Regulation, as amended, and included in the amount of PLN -1 444 627 thousand.

Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value

In accordance with Article 33 of the CRR Regulation, regulatory adjustments in the amount of PLN 18 384 thousand regarding accumulated other comprehensive income, constituting the fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value, adjusted the accumulated other comprehensive income item, mentioned above.

Negative amounts resulting from the calculation of expected loss amounts

IRB shortfall of credit risk adjustments to expected losses in the amount of PLN -310 392 thousand was included in the calculation of Common Equity Tier 1 capital as at 31 December 2025, in accordance with point d) of Article 36(1) CRR Regulation.

Exposure amount of the following items qualifying for a risk weight of 1 250 % if the institution opts for the deduction option - of which: securitisation items (negative amount)

Included in the calculation of Common Equity Tier 1 capital as at 31 December 2025 is the amount of the adjustment for synthetic securitisation transactions executed on the corporate and retail loan portfolios, for a total amount of PLN -30 444 thousand.

Other regulatory adjustments

Other regulatory adjustments include current specific credit risk adjustments, adjustment related to the exposures in the form of units or shares in collective investment undertakings, insufficient coverage for non-performing exposures and fair value gains and losses arising from the institution's own credit risk related to derivative liabilities calculated in accordance with Article 33(2) of the CRR Regulation.

Other regulatory adjustments	
CET1 capital elements or deductions	(271 252)
Insufficient coverage for non-performing exposures	(67 375)
Fair value gains and losses arising from the institution's own credit risk related to derivative liabilities	(2 440)
Total	(341 067)

ADDITIONAL TIER 1 CAPITAL

The AT1 Bonds issued on 6 December 2024, were included in Additional Tier 1 Capital in amount of PLN 1.5 billion. On 31 December 2024, the Bank received a decision of the Polish Financial Supervision Authority on the consent to qualify the bonds to own funds as additional instruments in Tier I capital.

TIER 2 CAPITALCapital instruments and the related share premium accounts

Pursuant to the PFSA decision of 29 March 2018, mBank obtained a permission to classify cash in the amount of CHF 250 000 thousand as instruments in Tier 2 capital, in accordance with the terms of the loan agreement concluded between mBank S.A. and Commerzbank AG. This instrument qualifies as an item in Tier 2 capital to the extent compliant with the depreciation principles referred to in Article 64 of the CRR Regulation.

Pursuant to the PFSA decision of 28 November 2018, mBank obtained a permission to classify subordinated bonds with a nominal value of PLN 550 000 thousand, issued by the Bank on 9 October 2018 with the redemption date on 10 October 2028, as instruments in Tier 2 capital. This instrument qualifies as an item in Tier 2 capital to the extent compliant with the depreciation principles referred to in Article 64 of the CRR Regulation.

Pursuant to the PFSA decision of 29 August 2025, mBank obtained a permission to classify subordinated bonds with a nominal value of EUR 400 000 thousand, issued by the Bank on 25 June 2025 with the redemption date on 25 September 2035, as instruments in Tier 2 capital.

As at 31 December 2025 in the consolidated Tier 2 capital in the item Equity instruments and related share premium accounts the amount of PLN 2 520 897 thousand was included from the above-mentioned tranches of capital instruments.

Template EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments

		a	b	c	d	e
		Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information
1	Issuer	mBank S.A.	mBank S.A.	mBank S.A.	mBank S.A.	mBank S.A.
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	PLBRE000012	ISIN: PLBRE0005227 Series: MBK01 GPW Ticker: MBK01PERP-K	Not applicable	ISIN: PLBRE0005193 Issue: MBK0101028	ISIN: XS3090129332 Issue: 14
2a	Public or private placement	Public	Public	Private placement	Private placement	Public
3	Governing law(s) of the instrument	Polish	Polish	German and Polish in relation to subordination	Polish	English, except for the status of the Bonds, the prohibition of set-off, the clause concerning the recognition of any decision of the resolution authority in respect of the write-down or conversion of the instrument, and the provisions concerning the recognition of powers to suspend or limit rights in the context of resolution and orderly liquidation, governed by Polish law.
3a	Contractual recognition of write down and conversion powers of resolution authorities	Not applicable	No	Not applicable	Not applicable	Not applicable
Regulatory treatment						
4	Current treatment taking into account, where applicable, transitional CRR rules	CET1 capital	Additional Tier 1 capital	Tier II capital	Tier II capital	Tier II capital
5	Post-transitional CRR rules	CET1 capital	Additional Tier 1 capital	Tier II capital	Tier II capital	Tier II capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and (sub-) consolidated	Eligible at solo and (sub-) consolidated	Eligible at solo and (sub-) consolidated	Eligible at solo and (sub-) consolidated	Eligible at solo and (sub-) consolidated
7	Instrument type (types to be specified by each jurisdiction)	Common shares - meeting the conditions set out in Art. 28 of the CRR Regulation	Capital bonds within the meaning of Article 27a (1) (a) of the Bond Act that meets the conditions set forth in Article 52 of the CRR.	Loan 'subordinated loans' - Polish Banking Act Art.127.2.2 - meeting the conditions set out in Art. 63 and 64 of the CRR Regulation	Bond 'Capital instruments' - Polish Banking Act Art.127.2.2 - meeting the conditions set out in Art. 63 and 64 of the CRR Regulation	Bond 'Capital instruments' - Polish Banking Act Art.127.2.2 - meeting the conditions set out in Art. 63 of the CRR Regulation
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	m PLN 170	m PLN 1 500	m PLN 504	m PLN 307	m PLN 1 710
9	Nominal amount of instrument	m PLN 170	m PLN 1 500	m CHF 250 (m PLN 1 135)	m PLN 550	m EUR 400 (m PLN 1 691)
EU-9a	Issue price	PLN 4	100%	Not applicable	100%	100%
EU-9b	Redemption price	PLN 4	100%	Not applicable	100%	100%
10	Accounting classification	Equity capital	Equity capital	Liability – amortised cost	Liability – amortised cost	Liability – amortised cost

	a	b	c	d	e	
	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	
11	Original date of issuance					
	1986: 10 000 000 shares	06.12.2024	21.03.2018	09.10.2018	25.06.2025	
	1986: 10 000 000 shares					
	1994: 2 500 000 shares					
	1995: 2 000 000 shares					
	1997: 4 500 000 shares					
	1998: 3 800 000 shares					
	2000: 170 500 shares					
	2004: 5 742 625 shares					
	2005: 270 847 shares					
	2006: 532 063 shares					
	2007: 144 633 shares					
	2008: 30 214 shares					
	2010: 12 395 792 shares					
	2011: 16 072 shares					
	2012: 36 230 shares					
	2013: 35 037 shares					
	2014: 36 044 shares					
	2015: 28 867 shares					
	2016: 41 203 shares					
2017: 31 995 shares						
2018: 24 860 shares						
2019: 13 385 shares						
2020: 16 673 shares						
2021: 17 844 shares						
2022: 48 611 shares						
2023: 31 672 shares						
2024: 31 806 shares						
2025: 28 868 shares						
12	Perpetual or dated	Perpetual	Perpetual	Dated	Dated	Dated
13	Original maturity date	No maturity date	Bonds without a fixed maturity / are perpetual	21.03.2028	10.10.2028	25.09.2035
14	Issuer call subject to prior supervisory approval	Not applicable	Yes	Yes	Yes	Yes

		a	b	c	d	e
		Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information
15	Optional call date, contingent call dates and redemption amount	Not applicable	<p>1) 06.12.2029; in full, subject to: (i) prior approval of the PFSA and (ii) that the current nominal value of the bonds on the redemption date equals the nominal value of the bonds on the issue date.</p> <p>2) Redemption for regulatory reasons; in full (prior approval of the PFSA & notification to investors required)</p> <p>3) Redemption for tax reasons; in full (prior approval of the PFSA & notification to investors required)</p>	<p>1) 21.03.2023; integral multiples of m CHF 10; notification of the lender, PFSA consent required;</p> <p>2) Redemption due to a tax or regulatory event (PFSA consent required); at the end of Interest Period; notification of the lender</p>	<p>1) 10.10.2023 No minimum amount; at price 100%</p> <p>2) Redemption due to a regulatory event (PFSA consent required, notification of investors) at a price of 100%, at any Interest Payment Date</p>	<p>Issuer call option: the Bonds may be redeemed on any Business Day from 25 June 2030 (inclusive) up to and including the first interest rate reset date, i.e. 25 September 2030 (inclusive), at 100% of their principal amount. Redemption is subject to: (i) obtaining the prior consent of the Polish Financial Supervision Authority (PFSA), (ii) notification of the Agent, and (iii) notification of the Bondholders.</p> <p>Issuer optional redemption – clean-up call: if at least 75% of the outstanding principal amount of the Bonds originally issued has been purchased and cancelled, the Issuer may redeem all Bonds then outstanding at 100% of their principal amount. Redemption is subject to: (i) obtaining the consent of the PFSA, (ii) notification of the Agent, and (iii) notification of the Bondholders.</p> <p>Tax redemption: the Bonds may be redeemed, at the Issuer's discretion, in whole, at 100% of their principal amount, at any time if there is a change in the tax treatment of the instruments.</p> <p>Redemption is subject to: (i) obtaining the consent of the Polish Financial Supervision Authority (PFSA), by demonstrating that such change is material and could not reasonably have been foreseen on the Issue Date, (ii) notification of the Agent, and (iii) notification of the Bondholders.</p> <p>Redemption upon the occurrence of a capital disqualification event: if, as a result of a change in regulations, a capital disqualification event occurs whereby the full or partial inclusion of the aggregate outstanding nominal amount of the Bonds in Tier II subordinated capital (on an individual or consolidated basis) becomes impossible, the Bank may redeem all the Bonds at 100% of their principal amount on a specified date. Redemption is subject to: (i) obtaining the consent of the Polish Financial Supervision Authority (PFSA), if required at the relevant time, (ii) notification of the Agent, and (iii) notification of the Bondholders.</p>
16	Subsequent call dates, if applicable	Not applicable	<p>Redemption of the bonds as an option of the Issuer: the Issuer may redeem the bonds then outstanding in full on any interest payment date falling not earlier than on the fifth anniversary of the issue date (prior approval of the PFSA & notification to investors required)</p>	<p>1) integral multiples of m CHF 10; notification of the lender, PFSA consent required; at the end of any Interest Period falling not earlier than the 5th anniversary of the Drawdown Date</p> <p>2) Redemption due to a tax or regulatory event (PFSA consent required); at the end of Interest Period; notification of the lender</p>	<p>Redemption due to a regulatory event (PFSA consent required, notification of investors) at a price of 100%, at any Interest Payment Date</p>	<p>1) Redemption at the option of the Issuer (clean-up call);</p> <p>2) Redemption for tax reasons;</p> <p>3) Redemption upon the occurrence of a capital disqualification event.</p>

		a	b	c	d	e
		Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information	Qualitative or quantitative information
Coupons / dividends						
17	Fixed or floating dividend/coupon	Floating dividend	Fixed coupon for five years, then reset and set for subsequent five-year periods based on the formula	Floating dividend	Floating dividend	Fixed coupon for five years and three months, then reset on the Reset Date and set at a fixed rate for the subsequent five-year period.
18	Coupon rate and any related index	Not applicable	Coupon set for five-year periods as PLN Swap 5Y rate + 6.00%	Compounded SARON 3M + 2.75%	WIBOR 6M + 1.80%	A fixed coupon of 4.7784% for five years and three months from the issue date, followed by a reset of the interest rate for the subsequent 5-year period, fixed at a level determined as the 5-year EUR swap rate plus 2.50%
19	Existence of a dividend stopper	No	No	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Not applicable	Not applicable	Not applicable
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Not applicable	Not applicable	Not applicable
21	Existence of step up or other incentive to redeem	No	No	No	No	No
22	Noncumulative or cumulative	Not applicable	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
25	If convertible, fully or partially	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
26	If convertible, conversion rate	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
27	If convertible, mandatory or optional conversion	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
28	If convertible, specify instrument type convertible into	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
29	If convertible, specify issuer of instrument it converts into	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
30	Write-down features	No	Yes	No	No	No
31	If write-down, write-down trigger(s)	Not applicable	Decrease in the Common Equity Tier I Capital Ratio to (i) below 5.125%, calculated at the individual level or (ii) below 5.125%, calculated at the consolidated level	Not applicable	Not applicable	Not applicable
32	If write-down, full or partial	Not applicable	Full (but not less than PLN 0.01 nominal value) or partial	Not applicable	Not applicable	Not applicable
33	If write-down, permanent or temporary	Not applicable	Temporary	Not applicable	Not applicable	Not applicable
34	If temporary write-down, description of write-up mechanism	Not applicable	The reduction in the current nominal value of the bonds will be equal to the amount needed to restore the Common Equity Tier I Capital Ratio to the level of 5.125% calculated both on a standalone and consolidated basis.	Not applicable	Not applicable	Not applicable
34a	Type of subordination (only for eligible liabilities)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
EU-34b	Ranking of the instrument in normal insolvency proceedings	Rank 10	Rank 9	Rank 8	Rank 8	Rank 8
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Not applicable	Receivables from liabilities included in the bank's own funds referred to in Article 62 of CRR Regulation, including interest and enforcement costs;	Receivables from subordinated liabilities not included in the Bank's own funds, including interest and costs of enforcement	Receivables from subordinated liabilities not included in the Bank's own funds, including interest and costs of enforcement	Receivables from subordinated liabilities not included in the Bank's own funds, including interest and costs of enforcement
36	Non-compliant transitioned features	No	No	No	No	No
37	If yes, specify non-compliant features	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
37a	Link to the full term and conditions of the instrument (signposting)	Not applicable	Link 1	Not applicable	Link 2	Link 3

Link 1: <https://www.mbank.pl/pdf/mssp-korporacje/relacje-inwestorskie/ratingi-instrumenty-dluzne/weo-mbank-at1-seria-mbk01-15-11-2024.pdf>

Link 2: https://www.mbank.pl/pdf/mssp-korporacje/relacje-inwestorskie/ratingi-instrumenty-dluzne/mbank_tier_ii_10nc5_weo-signed.pdf

Link 3: <https://www.mbank.pl/pdf/mssp-korporacje/relacje-inwestorskie/ratingi-instrumenty-dluzne/ratingi/emtn-mbank-final-terms-series-14.pdf>

Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		31.12.2025	31.12.2025	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and cash equivalents	40 481 387	40 481 387	-
2	Financial assets held for trading and hedging derivatives	4 280 130	4 280 130	-
3	Non-trading financial assets mandatorily at fair value through profit or loss, including:	779 355	779 355	-
3a	<i>Equity securities</i>	376 346	376 346	Template EU CC1: row 72 and 73, col. a)
3b	<i>Debt securities</i>	12 229	12 229	-
3c	<i>Loans and advances to customers</i>	390 780	390 780	-
4	Financial assets at fair value through other comprehensive income – Debt securities	33 807 473	33 807 473	-
5	Financial assets at amortised cost	193 254 235	193 254 235	-
6	Fair value changes of the hedged items in portfolio hedge of interest rate risk	7 642	7 642	-
7	Non-current assets and disposal groups classified as held for sale	10 779	10 779	-
8	Intangible assets	2 248 537	2 248 537	Template EU CC1: row 8, col. a)
9	Tangible assets	1 423 530	1 423 530	-
10	Current income tax assets	70 948	70 948	-
11	Deferred income tax assets	1 213 894	1 213 894	Template EU CC1: row 75, col. a)
12	Other assets	2 675 317	2 675 317	-
13	Total assets	280 253 227	280 253 227	-
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Financial liabilities held for trading and hedging derivatives	1 456 404	1 456 404	Template EU CC1: row 27a, col. a)
2	Financial liabilities measured at amortized cost, including:	249 246 861	249 246 861	-
2a	<i>Amounts owed to banks</i>	2 433 572	2 433 572	-
2b	<i>Amounts due to clients</i>	229 145 729	229 145 729	-
2c	<i>Lease liabilities</i>	652 757	652 757	-
2d	<i>Liabilities due to debt securities issued</i>	13 611 091	13 611 091	-
2e	<i>Subordinated liabilities</i>	3 403 712	3 403 712	Template EU CC1: row 46, col. a)
3	Fair value changes of the hedged items in portfolio hedge of interest rate risk	305 818	305 818	-
4	Liabilities classified as held for sale	529	529	-
5	Provisions	2 028 905	2 028 905	-
6	Current income tax liabilities	114 492	114 492	-
7	Other liabilities	5 691 093	5 691 093	-
8	Total liabilities	258 844 102	258 844 102	-
Shareholders' Equity				
1	Registered share capital	170 103	170 103	Template EU CC1: row 1, col. a)
2	Share premium	3 467 458	3 467 458	Template EU CC1: row 1, col. a)
3	Profit from the previous years	12 755 248	12 755 248	Template EU CC1: row 2, 3, EU-3a, col. a)
4	Profit for the current year	3 543 540	3 543 540	Template EU CC1: row EU-5a, col. a)
5	Other components of equity	(27 224)	(27 224)	Template EU CC1: row 3, 11, col. a)
6	Additional equity components	1 500 000	1 500 000	Template EU CC1: row 30, col. a)
7	Total shareholders' equity	21 409 125	21 409 125	-

OWN FUNDS AND ELIGIBLE LIABILITIES

The information below fulfils the requirements arising from Article 99a(6) of the Act of June 10, 2016 on the Bank Guarantee Fund, Deposit Guarantee Scheme and Resolution ("BFG Act").

The scope of information is in line with the provisions of Commission Implementing Regulation (EU) 2021/763 of 23 April 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 the supervisory reporting and public disclosure of the minimum requirement for own funds and eligible liabilities (as amended).

mBank is a resolution entity within the resolution group consisting of the Bank and its subsidiaries.

The Bank is subject to the requirements for own funds and eligible liabilities ("MREL") referred to in Article 98(1) of the BFG Act, transposing the provisions of Article 45 of the 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 in this respect.

mBank is not a global systemically important institution, nor is it the part of a group identified as a global systemically important institution. Therefore, the Bank is not subject to the requirements specified in Article 92a of the CRR Regulation concerning the minimum level of own funds and liabilities subject to write-down or conversion.

mBank is neither an entity referred to in Art. 97h section 1 of the BFG Act nor an entity against which the BFG made a decision referred to in Art. 97h section 3 of the BFG Act.

Based on the decision of the resolution college received on 6 May 2025, the MREL requirement for the Bank on consolidated level, excluding mBank Hipoteczny S.A. from consolidation in accordance with Article 97(4a) of the BFG Act, is 15.36% in relation to the total risk exposure amount ("TREA"), including 13.61% for own funds and eligible subordinated liabilities. In relation to total exposure measure ("TEM") the requirement is 5.91%, including 5.33% for own funds and eligible subordinated liabilities. The Bank shall fulfil these requirements from the day of decision reception.

Simultaneously, 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 has to maintain the MREL at 19.43% in relation to TREA, including subordination requirement at 17.68%.

As of 31 December 2025, the Bank met the applicable minimum requirements. The MREL ratio as at 31 December 2025 in relation to TREA was 24.84% while the MREL ratio including own funds and eligible subordinated liabilities was 23.16%. The MREL ratio in relation to TEM as of 31 December 2025 was 10.26%, while the MREL ratio including own funds and eligible subordinated liabilities was 9.56%.

EU KM2: Key metrics - MREL

		a	b	c	d	e	f
		Minimum requirement for own funds and eligible liabilities (MREL)	G-SII Requirement for own funds and eligible liabilities (TLAC)				
		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	31 129 030	-	-	-	-	-
EU-1a	Of which own funds and subordinated liabilities	29 015 680					
2	Total risk exposure amount of the resolution group (TREA)	125 299 875	-	-	-	-	-
3	Own funds and eligible liabilities as a percentage of TREA (row1/row2)	24.84%	-	-	-	-	-
EU-3a	Of which own funds and subordinated liabilities	23.16%					
4	Total exposure measure of the resolution group	303 536 163	-	-	-	-	-
5	Own funds and eligible liabilities as percentage of the total exposure measure	10.26%	-	-	-	-	-
EU-5a	Of which own funds or subordinated liabilities	9.56%					
6a	Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption)		-	-	-	-	-
6b	Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities instruments If the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption)		-	-	-	-	-
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 (%)		-	-	-	-	-
Minimum requirement for own funds and eligible liabilities (MREL)*							
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	13.61%					
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	5.33%					

* Without taking into account the combined buffer requirement

EU TLAC1 - Composition - MREL

		a	b	c
		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)	16 717 713	-	-
2	Additional Tier 1 capital (AT1)	1 500 000	-	-
3	Empty set in the EU			
4	Empty set in the EU			
5	Empty set in the EU			
6	Tier 2 capital (T2)	2 520 897	-	-
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	20 738 610	-	-
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)	7 403 058	-	-
EU-12a	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)	-	-	-
EU-12b	Eligible liabilities instruments that are subordinated to excluded liabilities, issued prior to 27 June 2019 (subordinated grandfathered)	-	-	-
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	874 012	-	-
13	Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre cap)	2 113 350	-	-
EU-13a	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)	-	-	-
14	Amount of non subordinated instruments eligible, where applicable after application of Article 72b (3) CRR	2 113 350	-	-
15	Empty set in the EU			
16	Empty set in the EU			
17	Eligible liabilities items before adjustments	10 390 419	-	-
EU-17a	Of which subordinated	8 277 069	-	-
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements				
18	Own funds and eligible liabilities items before adjustments	31 129 030	-	-
19	(Deduction of exposures between MPE resolution groups)		-	
20	(Deduction of investments in other eligible liabilities instruments)	-	-	
21	Empty set in the EU			
22	Own funds and eligible liabilities after adjustments	31 129 030	-	-
EU-22a	Of which own funds and subordinated	29 015 680		
Risk-weighted exposure amount and leverage exposure measure of the resolution group				
23	Total risk exposure amount	125 299 875	-	-
24	Total exposure measure	303 536 163	-	-
Ratio of own funds and eligible liabilities				
25	Own funds and eligible liabilities (as a percentage of total risk exposure amount)	24.84%	-	-
EU-25a	Of which own funds and subordinated	23.16%		
26	Own funds and eligible liabilities (as a percentage of total exposure measure)	10.26%	-	-
EU-26a	Of which own funds and subordinated	9.56%		
27	CET1 (as a percentage of TREA) available after meeting the resolution group's requirements	8.45%	-	
28	Institution-specific combined buffer requirement		-	
29	of which: capital conservation buffer requirement		-	
30	of which: countercyclical buffer requirement		-	
31	of which: systemic risk buffer requirement		-	
EU-31a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer		-	
Memorandum items				
EU-32	Total amount of excluded liabilities referred to in Article 72a(2) CRR		-	

EU TLAC3b: creditor ranking - resolution entity

		Insolvency ranking						Sum of 1 to n
		1 (most junior)	2	3	4	5	9 (most senior)	
1	Description of insolvency rank (free text)	Share capital	Equity instruments that qualify as Additional Tier 1 capital	Subordinated instruments that qualify as Tier 2 capital	Subordinated instruments not included in Tier 2 capital	Senior non-preferred liabilities	Other liabilities	
2	Empty set in the EU							
3	Empty set in the EU							
4	Empty set in the EU							
5	Own funds and liabilities potentially eligible for meeting MREL	17 003 012	1 500 000	3 394 909	-	7 403 058	2 113 350	31 414 329
6	of which residual maturity \geq 1 year < 2 years	-	-	-	-	5 289 708	-	5 289 708
7	of which residual maturity \geq 2 year < 5 years	-	-	1 684 750	-	-	2 113 350	3 798 100
8	of which residual maturity \geq 5 years < 10 years	-	-	1 668 105	-	2 113 350	-	3 781 455
9	of which residual maturity \geq 10 years, but excluding perpetual securities	-	-	-	-	-	-	-
10	of which perpetual securities	17 003 012	1 500 000	-	-	-	-	18 503 012

5. Capital requirement

5.1 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. On 27 October 2025, the Bank exercised the option to increase the portfolio's notional amount (ramp-up option) under this transaction from PLN 5 237 million up to an amount of PLN 7 000 million. As a result of exercising the option, the notional amount of the paid CLN bonds increased to PLN 560 million from an initial value of PLN 419 million. 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.

On 21 October 2025, the Bank concluded a synthetic securitization transaction executed on a portfolio of corporate project finance loans (comprising predominantly projects financing renewable energy sources) with a total value of PLN 3 778 million as at 29 August 2025. 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 Standardised Approach for Securitisation (SEC-SA).

In the calculation of the total capital ratio of mBank Group as of 31 December 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.

5.2 Results of the internal capital adequacy assessment process

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 algorithm using the Standardised Measurement Approach (SMA). The bank also designated capital for other, including hard-to-measure risks. Starting from June 2024, mBank included environmental, social and governance risks (ESG risks) in its internal capital calculation. 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.

5.3 Additional information regarding IRB

Description of the internal rating process, provided separately for each class of exposures, addressing disclosure requirements of art. 452 (c) of CRR

Corporates and Commercial Banks

The process of rating corporate banking clients is an integral part of the lending process. Without a rating it is impossible to make a credit decision.

There are two types of rating used to assess corporate clients and exposures:

1. PD-rating - (PD - Probability of Default) assessment of the client's risk of default construed as the probability of default (client's default on obligations) over a 12-month period,
2. EL-rating - (EL - Expected Loss) assessment of the probability of a loss, considering the client's risk of default, structure and nature of credit products, and type and size of accepted collateral.

To ensure unbiased assessment and management of credit risk, mBank applies uniform rules based, in particular, on the separation of credit risk assessment function from the sales function at all levels. The sales units make the initial assessment of a client and propose a PD-rating which is then subject to independent assessment and approval of Risk Line representatives. By approving the credit risk level, the Risk Line representatives take full responsibility for its correct assessment.

Correct assessment of credit risk requires complete, valid and reliable information on the client. At a further stage of the analysis, the information affects not only PD-rating, but also other risk parameters (Exposure at Default (EAD), Loss Given Default (LGD), and consequently EL-rating). mBank indicated a list of documents which the clients are obliged to submit for the purpose of assessing their risk level and required collateral. Furthermore, in the credit agreements mBank specifies a list of documents the clients undertake to submit to mBank for the purpose of verifying/updating their assessment and updating the valuation of collateral and obliges the clients to notify mBank of any events affecting their creditworthiness. When submitted, the documents are verified in terms of compliance with mBank's requirements and formal correctness.

Acting in line with the Banking Law and Basel recommendations, when assessing credit risk mBank takes into account the mutual relations and links between entities, as they may lead to a situation when financial problems faced by one entity translate into financial problems of another. The relations referred to above are verified by way of analysing the entity's affiliation to a group of related entities (GPP), and then are taken into account in credit risk assessment, mainly through:

- calculating PD-rating based on consolidated data, provided that the entity draws up Consolidated Financial Statements,
- including the PD-rating of the dominant entity in the assessment of its subsidiary, proportionally to the degree of the group's integration.

When assessing foreign entities (non-residents), mBank takes into account the risk of the country of their origin.

The assessment and PD-rating calculation for corporate clients take place in one of the following systems:

- 1) RC-POL,
- 2) Central Commerzbank PD model for Commercial Banks,
- 3) System for Property Insurance Institutions,
- 4) System for Life Insurance Institutions,
- 5) System for Investment Funds,
- 6) System for Pension Funds,
- 7) System for Local Governments (JST),
- 8) System for Specialized Lending Entities (SPL),
- 9) Brokerage operations – expert system for selected clients (who meet specific criteria) who conduct brokerage operations connected with the securities and commodities market,
- 10) Model PD for Sovereigns (central Commerzbank model for governments and central banks)
- 11) Expert System – dedicated to the remaining corporate banking clients.

The RC-POL system covers 2 segments (SME and Corporations) used depending on the amount of the client's average, annual net revenues from the sales of products, commodities and materials:

- a. RC-POL SME revenues ≤ PLN 50 million,
- b. RC-POL Corporations revenues > PLN 50 million.

The detailed principles for assigning corporate banking clients to a given rating system are set out in Bank's internal regulations.

The process of assigning PD-rating is supported by Credit System (SK) or CRM 2.0, an IT application based on a workflow platform. The process takes place individually for each entity applying to mBank for a credit risk product. The calculation of PD-rating takes the following into account: analysis of financial data comprised in the annual financial statements, analysis of mid-year financial data, quality analysis and analysis of other factors.

The complete course of the PD-rating calculation process is registered in Bank's Credit System or CRM 2.0, including all the data which forms a basis for the assessment, and decisions of authorities approving the assessment.

Upon completing the analysis, the system automatically proposes the final PD-rating, which in exceptional and justified cases may be corrected on an expert basis (the so-called overriding). The maximum liberal correction is limited to one notch on a 25-point rating scale, there is no limit for the conservative correction. The Bank allows a wider scope of overriding:

- full-scale overriding is possible in the case of non-residents and selected client classes,
- extended overriding (by a maximum of 5 notches) in a limited scope (defined in Bank's internal regulations) is allowed for entities for which during the financial year an unitary business event occurred, which due to the accounting method could not be included in the rating model.

mBank systematically analyses all the events of overriding, which is aimed at preventing its excessive use. On the basis of results of the client's risk assessment and his financial needs, the amount and structure of the General Limit (LG) are determined. LG is the maximum permissible financial exposure of Bank to the client. The LG structure defines the permissible structure of credit products, amounts and terms, required minimum level and type of collateral, and other conditions specific to particular types of funding.

EL-rating, which determines the maximum risk acceptable by mBank in the case of a given client or GPP under the conditions established in the decision, constitutes a comprehensive assessment of the risk posed by the entire exposure to the client or GPP. Exposures to clients and GPP must go through a multi-level system of credit decisions. The key criteria qualifying exposures to particular decision-making levels include total exposure and EL-rating/PD-rating. When taking a decision on total exposure to a given client, mBank takes into account also the client's exposure to mBank Group subsidiaries (i.e. mLeasing and mFactoring). Clients generating high capital requirements must undergo a special decision-making procedure. In such a case, the decisions are made by Bank's Management Board.

PD-rating of each credit client is updated at least once a year based on the latest audited annual financial statements and the most recent information on the client. According to the monitoring matrix Bank reviews all its credit clients in order to check whether the PD-rating determined during the annual review is adequate to their current situation assessed on the basis of the latest mid-year data. Each mid-year monitoring may end with the reassignment of rating. Moreover, each time mBank obtains new and relevant information on its obligors or exposures in the time between the mid-year assessments, another analysis of their situation may be carried out and on the basis of its results mBank may decide to take new actions. Once a year, the client's assessment is combined with a review of his exposures; consequently, a credit decision is made on further cooperation with the client.

For the assessment of exposures classified as specialized lending, the Bank uses two independent rating models:

- a model built internally by the Bank, dedicated to the assessment of specialized lending exposure, classified as financing of goods, facilities, projects, leveraged acquisition (SPL TOP),
- a model, dedicated to the assessment of specialized lending exposures, classified as the financing of commercial real estate (SPL FN).

Both models are based on a list of questions covering supervisory requirements and results in the EL parameter in accordance with the values predefined by the Supervisor.

Bank applies individualized rating sheets within a given rating model. The individualization of rating sheets under the specialized lending consists in the fact that:

- for SPL FN depending on the type of real estate (under construction, completed),
- for SPL TOP, depending on the type of financing (goods, facilities, projects, leveraged acquisition) an appropriate, separate format of the rating sheet is used.

The rating for SPL TOP and SPL FN is supported by Bank's systems through dedicated calculation processes for this parameter.

The Bank performs transactions generating credit risk in relation to banks, credit institutions and international financial institutions within the limits of credit exposure designated for these entities. The element used in determining these limits is PD rating of the entity, obtained from Commerzbank AG and setting on the basis of a central rating model dedicated to the appropriate institution type.

The process of setting exposure limits for these entities is carried out using the methodology contained in the "Criteria for assessment and setting limits of banks and international financial institutions credit exposure".

The criteria include:

- a. the rating of the financial strength of the counterparty / issuer based on:
 - o assessment of the probability of incurring losses by the bank / international financial institution (analysis of credit risk of assets and liabilities, analysis of liquidity risk, assessment of other relevant information indicating the possibility of bank losses),
 - o assessment of the bank's ability to withstand critical situations in relation to the risks incurred (analysis of financial results, assessment of capital adequacy, assessment of other relevant information indicating the ability to withstand critical situations),
- b. rating including the assessment of counterparty / issuer integration in the group,
- c. the financial rating of the counterparty / issuer - rating including a credit risk assessment of the country of origin and country of risk of the counterparty / issuer (in accordance with the "Criteria for credit risk assessment of the country and setting the county credit exposure limit").

An integral part of the criteria is the Business Model Risk Assessment Block consisting of:

- a. identification of the structure of used intangible assets,
- b. analysis of the features of the broadly understood business model (analysis of the intangible assets model),
- c. assessing the sensitivity of the broadly understood business model.

In addition, the criteria include:

- a. the method of setting the maximum limit of credit exposure,
- b. rules for updating temporary tenors for which limits on transactions are set,
- c. the method of setting the financial rating of the counterparty / issuer according to the shortened credit risk assessment formula,
- d. an early warning model.

Retail

The assessment of a retail banking customer, applying for a loan or change of loan terms, is focused, in accordance with the provisions of the Banking Law and PFSA recommendations, on two areas:

- assessment of the customer's credit capacity, which consists in determining the loan amount available to the customer,
- assessment of the customer's creditworthiness, that is assessment of default risk during the service of the loan, expressed in the form of PD Rating.

These areas are assessed independently from each other, that is the lack of credit capacity may not be compensated for with a very good PD Rating; and high credit capacity may not offset unacceptable PD Rating. In order to ensure the high accuracy of the determined PD Rating, data from all available sources are used, i.e.:

- data from the loan application (application scoring, specific for different product segments of the portfolio),
- data on customers behaviour in relations with mBank (internal behavioural scoring),
- data on customers behaviour in relations with other banks (external behavioural scoring based on BIK - Credit Bureau information).

Depending on the availability of data from individual areas and the context of making the assessment (customer's credit application or offer provided to the customer by mBank), the above data sources are used in various combinations. Each application for a credit product for individuals / small enterprises is registered in a loan application processing IT system. After registering the application, the information from internal and external data sources are downloaded. The verification results are again registered in the application processing system, and then the set of data required for calculating risk parameters is handed over to the decision-making engine, integrated with application processing system.

On the basis of the information obtained, PD score is calculated in the decision-making engine and the customer is assigned to the appropriate rating class (consistently within the Commerzbank Group). Moreover, risk parameters LGD and EL are calculated on the basis of data related to the assessed transaction. At the subsequent stage of the process, decision rules based on threshold values of risk parameters (PD Rating, LGD, EL) are applied, in accordance with the rules of the decision-making policy accepted at mBank. The result of the assessment is then returned to the application system. The process of PD Rating assignment and the calculation of the remaining risk parameters is strictly structured and automated thanks to the use of IT applications.

Customer's rating and the values of other risk parameters are made available to persons taking credit decisions. The level of authority required for taking an individual credit decision is dependent, i.a. on the value of risk parameters (PD Rating / LGD / EL). In the case of retail customers, Bank does not allow for arbitrary rating amendments, hence the persons taking credit decisions are not allowed to modify the registered values.

Taking a positive decision in spite of a negative assessment in the system (PD Rating or another risk parameter that is beyond the accepted range) is treated as a non-standard decision and requires approval by a superior decision-making level. mBank monitors the quality of loans granted on the basis of non-standard decisions that is independent from the quality monitoring of the entire credit portfolio. In retail banking, risk parameter values (including PD Rating) are updated:

- periodically – on the basis of a monthly recalculation of behavioral scoring and updating the delinquency data,
- ad hoc – in the process of customer's applying for new loans.

The rating process is under constant supervision in terms of quality of data that are used. Data quality assessment is conducted by a dedicated unit.

The information below meets the disclosure requirements of template EU CRE – Qualitative information on the IRB approach, in accordance with Article 452 of the CRR.

The competent authority's permission of the approach or approved transition.

Within the rating system for the **retail exposures portfolio**, three crucial risk models are used: the PD12M model, the LGD model and the CCF model. All the above-mentioned models are statistical models with expert's knowledge influence, which have been built locally, using internal institution data. The rating system is used for the following exposure classes:

- the retail exposures: secured by mortgage,
- the retail exposures: qualifying revolving retail exposures,
- the retail exposures: other.

Within the rating system of the **corporation exposures portfolio**, three crucial risk models are used: the PD12M model, the LGD model and the CCF model. All the above-mentioned models are statistical models with expert's knowledge influence, which have been built locally, using internal institution data. In addition, the PD12M model is a group model also used in mLeasing Sp. z o.o. The rating system is used for the following exposure classes:

- the corporate exposure to enterprises.

Within the rating system for the **corporation exposure portfolio to financial institutions**, three crucial risk models are used: the PD12M model, the LGD model, and the CCF model. All these models are statistical models built using expert's knowledge with Commerzbank AG as the source of origin but they are used in Bank locally. The rating system is used for the following exposure classes:

- the corporate exposure to institution.

Within the rating system for the **corporation exposure portfolio – special lending of commercial real estate** one risk model of slotting approach type is used. The above-mentioned model is expert's model and is used in the following exposure classes:

- the corporation exposure, special lending: income-producing property.

Within the rating system for the **mLeasing retail exposure portfolio**, two crucial risk models are used: the PD12M model and the LGD model (which is general for the detail exposure and for mLeasing portfolio). These models are statistical models with expert's knowledge influence, which have been built locally, using internal institution data. The rating system is used for the following exposure classes:

- the retail exposures to mLeasing customers.

The control mechanisms for rating systems at the different stages of model development, controls and changes

The control mechanisms are used for all models covered by the AIRB's method:

- annual monitoring is performed by Modelling Team based on internal data. The scope and manner of the analyses are regulated by defined methodologies for monitoring of credit risk models.
- annual validation is performed by an independent (of Modelling Team) Validation Team. The scope and manner of the analyses are regulated by defined methodologies for validation of credit risk models.

The independence of Validation and Modelling Team function is provided by setting them into different units of Bank's organizations (departments). It is associated with reporting to independent senior Bank's management.

The role of the functions involved in the development, approval and subsequent changes of the credit risk models

The processing and implementation changes into models covered by the IRB's method are run by dedicated Bank's modelling units who are owners of risk parameters models. The Bank's independent validation unit is responsible for carrying out model reviews to verify their quality and consistency with regulatory

guidelines. The process of approving models and models' changes is a subject of decision by a dedicated committee (the Model Risk Committee) chaired by the Bank's Chief Risk Officer.

The scope and main content of the reporting related to credit risk models

The management reporting process for models covered by the IRB's method is regulated by a dedicated procedure of the Bank's work and is performed with at least annual frequency. The management report is presented at the Models Risk Committee, which is attended by, among others, the Bank's Chief Risk Officer and representatives of the Bank's senior management representing the units that are business users of the respective models. In accordance with the supervisory requirements of Article 189 CRR, the report shall include at least a comparison of modelled and realised values at the level of individual risk parameters as well as migration between risk categories. realised

The last management report was reported in December 2025. On the level of analyzed models, the report did not identify anomalies in terms of model value realisation and migration between risk categories.

A description of the internal ratings process by exposure class, including the number of key models used with respect to each portfolio and a brief discussion of the main differences between the models within the same portfolio

In the case of all models: PD12M, LGD, CCF, the definitions are compliant with external (CRR) and internal Bank's regulations including definition of 'bad' observation.

Within the rating system for the retail exposure portfolio, three crucial risk models are used: the PD12M model, the LGD model, and the CCF model.

The PD12M model

- the methods used during the construction: including logistic regression, ROC curve, WoE, kernel estimation,
- the methods used during the backtesting of the model: including GINI, Jeffrey test, binominal test,
- during the construction, application data, data from reports of Poland's Credit Information Bureau and behavioural data about quality of relation with customers are used with a time horizon of at least five years, involving all observations eligible for the rating system,
- within the rating system immaterial share of regulatory limit PDs (0.03%) was met but these affect <0.1% of the population.

The LGD model

- the methods used during the construction: including arithmetic mean, regression trees, fractional regression,
- the methods used during the backtesting of model: including ROC, GINI, error analysis (MAE, RMSE), CLAR, calibration of the model values to empirical values,
- during the construction, internal data are used with a time horizon of at least five years, involving all observations eligible for the rating system,
- the conservatism of approach: conservative adjustments and haircuts, including calibration of the LGD to the economic downturn based on internal data from a historical time series of losses,
- the average duration of a default is 19 months for non-mortgage-secured exposures and 31 months for mortgage-secured exposures.

The CCF model

- the methods used during the construction: including arithmetic mean, regression trees,
- the methods used during the backtesting of model: including ROC, GINI, error analysis (MAE, RMSE),
- during the construction, internal data are used with a time horizon of at least five years, involving all observations eligible for the rating system.

Within the rating system for the corporation exposure portfolio to enterprises, three crucial risk models are used: the PD12M model, the LGD model, and the CCF model.

The PD12M model

- the methods used during the construction: including logistic regression, WoE, ln(odds), kernel estimation,
- the methods used during the backtesting of the model: including GINI, ROC curve, Jeffrey test, binominal test,
- during the development internal Bank's and Bank's Group data were used with a time horizon of at least five years, involving all observations eligible for the rating system,
- within the rating system immaterial share of regulatory limit PDs (0.03%) was met but these affect <1% of the population.

The LGD model

- the methods used during the construction: including arithmetic mean, linear regression,
- the methods used during the backtesting of model: including ROC, GINI, CLAR, calibration of the model values to empirical values,
- during the construction, internal data are used with a time horizon of at least five years, involving all observations eligible for the rating system,
- the conservatism of approach: conservative adjustments and haircuts, including calibration of the LGD to the economic downturn based on internal data from a historical time series of losses,
- the average duration of a default is 40 months.

The CCF model

- the methods that were used during the construction: including arithmetic mean, regression trees,
- the methods that were used during the backtesting of the model: including ROC, GINI, error analysis (MAE, RMSE),
- during the construction, internal data is used with a time horizon of at least five years, involving all observations eligible for the rating system.

Within the rating system for the corporation exposure portfolio to financial institutions, single central risk model is used (the model's origin is Commerzbank): the PD12M model.

The PD12M model

- the definitions that were in order of external (CRR) and internal Commerzbank's regulations, including definition of 'bad' observation,
- the methods that were used during the construction: including logistic regression, LN(odds), kernel estimation,
- the methods that were used during the backtesting of the model: including AUC, GINI,
- during the construction, internal Commerzbank's data and external data (Bankscope base, Fitch agency) were used with a time horizon of at least five years, involving all observations eligible for the rating system,
- the possible differences between PD and default rate arise from specific of the low default portfolio in mBank.

A slotting approach type rating model is used within the rating system for the corporation exposure portfolio – specialise lending of commercial real estate

- the methods that were used during the construction: including slotting approach,
- the methods that were used during the backtesting of the model: including GINI,
- during the construction, internal data which come from Bank and the group's company, is used with a time horizon of at least five years, involving all observations eligible for the rating system,
- the result of model's operation is not the risk parameters (PD, LGD, CCF) but the supervisor risk category (slotting approach).

Within the rating system for the mLeasing detail exposure portfolio, two crucial risk models are used: the PD12M model and LGD model (which is shared for the retail exposure and for the corporation mLeasing portfolio).

The PD12M model

- the methods used during the construction: including logistic regression, WoE, kernel estimation,
- the methods that were used during the backtesting of the model: including GINI, ROC curve, Jeffrey test, binominal test,
- during the development internal group data with a time horizon of at least five years, involving all observations eligible for the rating system was used,
- the lower supervisory limits of the PD parameter were not observed.

The LGD model

- the methods that were used during the construction: including arithmetic mean, non-linear regression,
- the methods that were used during the backtesting of the model: including ROC, GINI, CLAR, calibration of the model values to empirical values,
- during the construction, internal data are used with a time horizon of at least five years, involving all observations eligible for the rating system,
- the conservatism of approach: conservative adjustments and haircuts, including calibration of the LGD to the economic downturn based on internal data from a historical time series of losses,
- the average duration of a default is 42 months.

Rating systems' validation

Validation is an internal, complex process of independent and objective assessment of model operation, which is consistent with Recommendation W requirements and, in the case of the IRB method, meets the supervisory guidelines set out in the CRR. The validation rules are set out in general in the "Model Management Policy" and described in details in other mBank's internal regulations. The validation covers models directly and indirectly used in the assessment of capital adequacy under the AIRB approach and other models indicated in the Model Register maintained in mBank.

The independence of validation unit is assured in the organizational structures of the Bank or the mBank Group's subsidiary in relation to the units involved in the model's construction/maintenance, i.e. the model owner and users. The Validation Unit (Division in Integrated Risk Management Department) is responsible for the validation in mBank.

The scope of validation performed by the Validation Unit covers the assessment of:

- models,
- model implementation,
- their application process.

Depending on the materiality and complexity of the model, as well as the type of validation task to be performed, the validation may be advanced (covers both quantitative and qualitative elements) or basic (mainly focused on the quantitative analyses and selected qualitative elements). The validation results are documented in the validation report containing, in particular, an assessment used for the purpose of approving the model, and recommendations, if any, in form of precautionary and remedial actions, about the irregularities found.

Validation tasks are performed in accordance with the annual validation plan. Both validation plan and the results of performed validation tasks are approved by the Model Risk Committee.

In the table below (with a breakdown to exposure classes) we present PD values, the number of obligors as well the default rate calculated in line with the rules described in EU CR9 form.

EU CR9 – IRB approach – Backtesting of PD per exposure class, addressing disclosure requirements of Art. 452 letter h) of CRR Regulation.

Exposure class	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		c	d				
a	b	c	d	e	f	g	h
Corporates - General (A-IRB)	0.00 to <0.15	505	47	9.31%	0.09%	0.08%	2.11%
	0.00 to <0.10	324	33	10.19%	0.07%	0.06%	2.36%
	0.10 to <0.15	181	14	7.73%	0.12%	0.12%	1.64%
	0.15 to <0.25	318	24	7.55%	0.20%	0.20%	1.79%
	0.25 to <0.50	977	64	6.55%	0.37%	0.39%	1.57%
	0.50 to <0.75	1 199	85	7.09%	0.62%	0.62%	2.05%
	0.75 to <2.50	4 307	328	7.62%	1.51%	1.48%	2.68%
	0.75 to <1.75	3 020	228	7.55%	1.22%	1.20%	2.52%
	1.75 to <2.5	1 287	100	7.77%	2.13%	2.12%	3.14%
	2.50 to <10.00	2 723	320	11.75%	4.46%	4.41%	5.83%
	2.5 to <5	1 989	207	10.41%	3.50%	3.51%	5.09%
	5 to <10	734	113	15.40%	6.84%	6.85%	8.00%
	10.00 to <100.00	881	158	17.93%	16.88%	29.92%	6.85%
	10 to <20	364	72	19.78%	13.57%	13.96%	10.14%
	20 to <30	103	29	28.16%	21.49%	24.33%	10.92%
30.00 to <100.00	414	57	13.77%	38.34%	45.35%	3.78%	
100.00 (default)		593	593	100.00%	100.00%	100.00%	n/d

EU CR9 – IRB approach – Backtesting of PD per exposure class (contd):

Exposure class	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
Retail – Secured by residential immovable property (A-IRB)	0.00 to <0.15	84 018	92	0.11%	0.09%	0.11%	0.11%
	0.00 to <0.10	22 110	2	0.01%	0.08%	0.09%	0.07%
	0.10 to <0.15	61 908	90	0.15%	0.12%	0.12%	0.15%
	0.15 to <0.25	31 187	92	0.29%	0.19%	0.18%	0.29%
	0.25 to <0.50	22 477	78	0.35%	0.35%	0.37%	0.54%
	0.50 to <0.75	9 160	50	0.55%	0.61%	0.61%	0.86%
	0.75 to <2.50	7 278	166	2.28%	1.23%	1.24%	2.72%
	0.75 to <1.75	6 136	120	1.96%	1.08%	1.09%	2.42%
	1.75 to <2.5	1 142	46	4.03%	2.09%	2.08%	4.25%
	2.50 to <10.00	2 203	200	9.08%	4.79%	4.77%	7.88%
	2.5 to <5	1 426	107	7.50%	3.54%	3.44%	5.71%
	5 to <10	777	93	11.97%	6.99%	7.20%	11.13%
	10.00 to <100.00	1 328	362	27.26%	32.48%	24.16%	27.17%
	10 to <20	616	136	22.08%	14.12%	14.33%	20.79%
	20 to <30	372	106	28.49%	24.91%	24.89%	33.07%
30.00 to <100.00	340	120	35.29%	51.74%	41.15%	48.20%	
100.00 (default)		3 231	3 231	100.00%	100.00%	100.00%	n/d

EU CR9 – IRB approach – Backtesting of PD per exposure class (contd):

Exposure class	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
Retail – Qualifying revolving (QRRE) (A-IRB)	0.00 to <0.15	48 700	46	0.09%	0.11%	0.12%	0.11%
	0.00 to <0.10	13 200	5	0.04%	0.00%	0.09%	0.08%
	0.10 to <0.15	35 500	41	0.12%	0.11%	0.13%	0.14%
	0.15 to <0.25	61 920	63	0.10%	0.20%	0.20%	0.14%
	0.25 to <0.50	115 225	162	0.14%	0.37%	0.36%	0.21%
	0.50 to <0.75	62 758	166	0.26%	0.61%	0.61%	0.50%
	0.75 to <2.50	112 971	1 117	0.99%	1.45%	1.41%	1.22%
	0.75 to <1.75	83 272	633	0.76%	1.19%	1.17%	0.98%
	1.75 to <2.5	29 699	484	1.63%	2.10%	2.09%	1.80%
	2.50 to <10.00	50 922	2 125	4.17%	4.68%	4.35%	4.75%
	2.5 to <5	37 159	1 182	3.18%	3.50%	3.44%	3.46%
	5 to <10	13 763	943	6.85%	6.93%	6.81%	7.73%
	10.00 to <100.00	13 881	3 758	27.07%	24.23%	25.64%	26.06%
	10 to <20	7 245	1 092	15.07%	14.10%	14.14%	15.86%
	20 to <30	2 766	705	25.49%	24.18%	24.35%	35.98%
30.00 to <100.00	3 870	1 961	50.67%	47.90%	48.08%	49.20%	
100.00 (default)		9 128	9 128	100.00%	100.00%	100.00%	n/d

EU CR9 – IRB approach – Backtesting of PD per exposure class (contd):

Exposure class	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
Retail - Other retail exposures (A-IRB)	0.00 to <0.15	12 135	258	2.13%	0.10%	0.12%	0.59%
	0.00 to <0.10	1 221	6	0.49%	0.08%	0.08%	0.23%
	0.10 to <0.15	10 914	252	2.31%	0.12%	0.13%	0.67%
	0.15 to <0.25	12 108	334	2.76%	0.19%	0.19%	0.78%
	0.25 to <0.50	35 245	746	2.12%	0.38%	0.41%	0.69%
	0.50 to <0.75	79 314	972	1.23%	0.62%	0.63%	0.67%
	0.75 to <2.50	224 205	3 620	1.61%	1.45%	1.40%	1.29%
	0.75 to <1.75	167 949	2 295	1.37%	1.20%	1.17%	1.03%
	1.75 to <2.5	56 256	1 325	2.36%	2.08%	2.09%	2.05%
	2.50 to <10.00	114 552	5 293	4.62%	4.47%	3.88%	4.07%
	2.5 to <5	94 653	3 339	3.53%	3.42%	3.26%	3.02%
	5 to <10	19 899	1 954	9.82%	6.86%	6.84%	7.07%
	10.00 to <100.00	19 896	6 364	31.99%	23.02%	24.01%	25.78%
	10 to <20	11 166	2 335	20.91%	14.27%	14.19%	15.90%
	20 to <30	4 111	1 328	32.30%	24.23%	24.29%	33.05%
30.00 to <100.00	4 619	2 701	58.48%	47.89%	47.49%	49.54%	
100.00 (default)		22 868	22 868	100.00%	100.00%	100.00%	n/d

EU CR9 – IRB approach – Backtesting of PD per exposure class (contd):

Exposure class	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
Institutions (F-IRB)	0.00 to <0.15	69	-	0.00%	0.05%	0.06%	0.32%
	0.00 to <0.10	64	-	0.00%	0.05%	0.05%	0.38%
	0.10 to <0.15	5	-	0.00%	0.12%	0.12%	0.00%
	0.15 to <0.25	7	-	0.00%	0.17%	0.21%	0.00%
	0.25 to <0.50	10	-	0.00%	0.31%	0.38%	0.00%
	0.50 to <0.75	5	-	0.00%	0.63%	0.65%	0.00%
	0.75 to <2.50	7	-	0.00%	1.84%	1.37%	0.00%
	0.75 to <1.75	4	-	0.00%	0.93%	0.81%	0.00%
	1.75 to <2.5	3	-	0.00%	2.14%	2.13%	0.00%
	2.50 to <10.00	2	-	0.00%	2.74%	4.42%	0.00%
	2.5 to <5	1	-	0.00%	2.74%	3.04%	0.00%
	5 to <10	1	-	0.00%	0.00%	5.81%	0.00%
	10.00 to <100.00	2	-	0.00%	47.34%	19.64%	0.00%
	10 to <20	1	-	0.00%	0.00%	11.61%	0.00%
	20 to <30	1	-	0.00%	0.00%	27.67%	0.00%
30.00 to <100.00	-	-	n/d	47.34%	n/d	0.00%	
100.00 (default)		-	-	n/d	0.00%	n/d	n/d

EU CR9 – IRB approach – Backtesting of PD per exposure class (contd):

Exposure class	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
Corporates - General (F-IRB)	0.00 to <0.15	8	-	0.00%	0.11%	0.08%	0.00%
	0.00 to <0.10	5	-	0.00%	0.05%	0.05%	0.00%
	0.10 to <0.15	3	-	0.00%	0.14%	0.11%	0.00%
	0.15 to <0.25	8	-	0.00%	0.18%	0.19%	0.00%
	0.25 to <0.50	7	2	28.57%	0.30%	0.36%	28.57%
	0.50 to <0.75	9	1	11.11%	0.56%	0.61%	11.11%
	0.75 to <2.50	26	9	34.62%	1.19%	1.43%	34.62%
	0.75 to <1.75	20	8	40.00%	1.17%	1.25%	40.00%
	1.75 to <2.5	6	1	16.67%	1.89%	2.05%	16.67%
	2.50 to <10.00	11	3	27.27%	5.47%	3.75%	27.27%
	2.5 to <5	10	3	30.00%	3.47%	3.16%	30.00%
	5 to <10	1	-	0.00%	8.84%	9.65%	0.00%
	10.00 to <100.00	3	1	33.33%	46.20%	22.23%	33.33%
	10 to <20	2	1	50.00%	0.00%	12.42%	50.00%
	20 to <30	-	-	n/d	0.00%	n/d	n/d
	30.00 to <100.00	1	-	0.00%	46.20%	41.85%	0.00%
100.00 (default)	-	-	-	n/d	0.00%	n/d	n/d

The following table presents the average model LGD values as of 31 December 2025 for retail mortgage, retail non-mortgage, corporate and mLeasing portfolio based on long-term historical series for non-defaulted exposures.

Indicators	Retail mortgages exposures	Retail non-mortgages exposures	Corporate exposures	mLeasing exposures
Mean model LGD (31.12.2025)	29.18%	79.76%	73.52%	26.57%
Mean model LGD weighted by EAD (31.12.2025)	28.25%	66.27%	53.40%	20.26%

5.4 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 31 December 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 31 December 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. Starting from September 2026, this rate will amount to 2%, in accordance with the Regulation of the Minister of Finance of 25 September 2025.

mBank S.A. Group

Disclosures regarding capital adequacy as at 31 December 2025

(PLN thousand)

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 December 2025 this ratio amounted to 1.02%.

In addition to exposures located in Poland, exposures of foreign branches in Czech Republic and in Slovakia, where countercyclical buffer rates as of 31 December 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

		31.12.2025
1	Total risk exposure amount	126 885 115
2	Institution specific countercyclical capital buffer rate	1.0151%
3	Institution specific countercyclical capital buffer requirement	1 288 011

Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c	d	e	f	g	h	i	j	k	l	m	
	General credit exposures		Relevant credit exposures - Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)	
	Exposures value under the standardized 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			Relevant credit risk exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures - Securitisation positions in the non-trading book					
10	Breakdown by country:													
20	Poland	27 300 230	112 603 110	5 496 675	-	17 589 333	162 989 348	6 906 855	40 662	406 396	7 353 913	91 923 911	93.6779%	1.00%
30	Czech Republic	7 104 409	884	-	-	-	7 105 293	293 212	-	-	293 212	3 665 149	3.7351%	1.25%
40	Slovakia	3 277 485	2 034	-	-	-	3 279 519	132 822	-	-	132 822	1 660 273	1.6920%	1.50%
50	Luxembourg	180 487	193 431	46 812	-	-	420 731	27 150	3 745	-	30 895	386 190	0.3936%	0.50%
60	Netherlands	1 444	157 246	-	-	-	158 690	10 555	-	-	10 555	131 940	0.1345%	2.00%
70	United States	37 922	25 919	-	-	-	63 841	8 294	-	-	8 294	103 678	0.1057%	-
80	Germany	55 716	89 976	-	-	-	145 691	7 425	-	-	7 425	92 810	0.0946%	0.75%
90	Russian Federation	42 276	11	-	-	-	42 287	5 073	-	-	5 073	63 415	0.0646%	-
100	Cyprus	514	36 497	-	-	-	37 011	2 533	-	-	2 533	31 661	0.0323%	1.00%
110	United Kingdom	950	26 579	-	-	-	27 529	1 333	-	-	1 333	16 663	0.0170%	2.00%
120	Austria	3	11 125	-	-	-	11 127	1 060	-	-	1 060	13 252	0.0135%	-
130	Ireland	1 287	11 249	-	-	-	12 537	684	-	-	684	8 545	0.0087%	1.50%
140	Belgium	2 788	555	-	-	-	3 344	517	-	-	517	6 458	0.0066%	1.00%
150	Malta	785	8 792	-	-	-	9 577	383	-	-	383	4 794	0.0049%	-
160	Switzerland	1 565	11 331	-	-	-	12 896	314	-	-	314	3 922	0.0040%	-
170	Slovenia	3 365	28	-	-	-	3 393	270	-	-	270	3 370	0.0034%	1.00%
180	United Arab Emirates	17	4 452	-	-	-	4 469	238	-	-	238	2 981	0.0030%	-
190	Sweden	606	1 848	-	-	-	2 454	96	-	-	96	1 206	0.0012%	2.00%
200	Spain	569	2 582	-	-	-	3 151	94	-	-	94	1 173	0.0012%	0.50%
210	Denmark	634	580	-	-	-	1 214	85	-	-	85	1 056	0.0011%	2.50%
220	Norway	683	1 152	-	-	-	1 835	75	-	-	75	941	0.0010%	2.50%
230	Portugal	259	917	-	-	-	1 176	45	-	-	45	565	0.0006%	-
240	Iceland	576	243	-	-	-	819	42	-	-	42	524	0.0005%	2.50%
250	France	414	1 118	-	-	-	1 532	32	-	-	32	398	0.0004%	1.00%
260	Canada	521	333	-	-	-	854	30	-	-	30	381	0.0004%	-

EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (contd):

	a	b	c	d	e	f	g	h	i	j	k	l	m	
	General credit exposures		Relevant credit exposures - Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)	
	Exposures value under the standardized 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			Relevant credit exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures - Securitisation positions in the non-trading book	Total				
270	Italy	66	416	-	-	-	482	30	-	-	30	372	0.0004%	-
280	Australia		520	-	-	-	520	28	-	-	28	347	0.0004%	1.00%
290	Hungary	1	108	-	-	-	108	18	-	-	18	221	0.0002%	1.00%
300	Egypt		132	-	-	-	132	17	-	-	17	212	0.0002%	-
310	Thailand		135	-	-	-	135	16	-	-	16	202	0.0002%	-
320	Saudi Arabia	288	508	-	-	-	797	15	-	-	15	191	0.0002%	-
330	New Zealand	347	180	-	-	-	527	9	-	-	9	107	0.0001%	-
340	Ukraine	4	338	-	-	-	342	8	-	-	8	105	0.0001%	-
350	Lithuania	8	87	-	-	-	95	8	-	-	8	101	0.0001%	1.00%
360	Virgin Islands, British	93	-	-	-	-	93	7	-	-	7	93	0.0001%	-
370	Finland		243	-	-	-	243	7	-	-	7	83	0.0001%	-
380	Israel	282	4	-	-	-	286	5	-	-	5	57	0.0001%	-
390	Colombia	265	16	-	-	-	281	4	-	-	4	54	-	-
400	Singapore	25	72	-	-	-	97	4	-	-	4	52	-	-
410	Estonia	1	51	-	-	-	52	2	-	-	2	29	-	1.50%
420	Chile	16	4	-	-	-	20	1	-	-	1	17	-	0.50%
430	Bulgaria	8		-	-	-	8	1	-	-	1	12	-	2.00%
440	Romania	5	-	-	-	-	5	1	-	-	1	7	-	1.00%
450	Greece		25	-	-	-	25		-	-		6	-	0.25%
460	Latvia	3	1	-	-	-	4		-	-		5	-	1.00%
470	Croatia		20	-	-	-	20		-	-		2	-	1.50%
480	Korea, Republic of		-	-	-	-	-	-	-	-	-	-	-	1.00%
490	Other	43	807	-	-	-	851	12	-	-	12	151	-	-
500	Total	38 016 961	113 195 660	5 543 488	-	17 589 333	174 345 441	7 399 412	44 407	406 396	7 850 214	98 127 680	100.0%	

In 2016 Bank received an administrative decision of the PFSA, 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 PFSA 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 PFSA 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 31 December 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 31 December 2025.

Consequently, the combined buffer requirement set for the mBank Group as of the 31 December 2025 amounted to 4.02% of the total risk exposure amount.

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

With a surplus mBank Group meets the combined buffer requirement.

mBank Group	31.12.2025		31.12.2024	
	Required level	Reported level	Required level	Reported level
Capital ratio				
Total capital ratio (TCR)	12.02%	16.34%	11.09%	17.03%
of which: combined buffer requirement	4.02%		3.09%	
Tier 1 ratio	10.02%	14.36%	9.09%	15.71%
of which: combined buffer requirement	4.02%		3.09%	
CET 1 ratio	8.52%	13.18%	7.59%	14.24%
of which: combined buffer requirement	4.02%		3.09%	

5.5 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.

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

		a	b	c	d	e
		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	16 717 713	16 094 337	15 181 647	14 499 548	13 343 086
2	Tier 1 capital	18 217 713	17 594 337	16 681 647	15 999 548	14 843 086
3	Total capital	20 738 610	20 208 513	17 864 931	17 249 190	16 201 233
	Risk-weighted exposure amounts					
4	Total risk exposure amount	126 885 115	121 130 820	119 056 148	112 376 374*	102 215 740
4a	Total risk exposure pre-floor	126 885 115	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 (%)	13.18%	13.29%	12.75%	12.90%	13.05%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	13.18%	13.29%	12.75%	12.90%	
6	Tier 1 ratio (%)	14.36%	14.53%	14.01%	14.24%	14.52%
6b	Tier 1 ratio considering unfloored TREA (%)	14.36%	14.53%	14.01%	14.24%	
7	Total capital ratio (%)	16.34%	16.68%	15.01%	15.35%	15.85%
7b	Total capital ratio considering unfloored TREA (%)	16.34%	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 (%)	1.02%	1.01%	0.08%	0.08%	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 (%)	4.02%	4.01%	3.08%	3.08%	3.09%
EU-11a	Overall capital requirements (%)	12.02%	12.01%	11.08%	11.08%	11.09%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.34%	8.53%	7.01%	7.35%	7.85%
	Leverage ratio					
13	Total exposure measure	306 117 076	285 241 160	279 808 594	264 039 199	262 882 185
14	Leverage ratio (%)	5.95%	6.17%	5.96%	6.06%	5.65%
	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)	98 299	94 117	91 867	89 097	86 562
EU-16a	Cash outflows - Total weighted value	45 491	43 894	42 948	42 231	41 403
EU-16b	Cash inflows - Total weighted value	2 852	2 606	2 557	2 569	2 397
16	Total net cash outflows (adjusted value)	42 639	41 289	40 391	39 662	39 006
17	Liquidity coverage ratio (%)	230%	228%	227%	225%	222%
	Net Stable Funding Ratio					
18	Total available stable funding	215 093	200 542	195 072	187 689	187 775
19	Total required stable funding	123 673	124 367	121 514	118 135	114 388
20	NSFR ratio (%)	174%	161%	161%	159%	164%

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

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

		a	b	c	d	e
		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	16 717 713	17 137 918	16 270 630	15 370 409	14 589 931
2	Tier 1 capital	18 217 713	18 637 918	17 770 629	16 870 409	16 089 931
3	Total capital	20 738 610	21 252 094	18 953 914	18 120 051	17 448 078
	Risk-weighted exposure amounts					
4	Total risk exposure amount	126 885 115	121 130 820	119 056 148	112 376 374	102 430 304
4a	Total risk exposure pre-floor	126 885 115	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 (%)	13.18%	14.15%	13.67%	13.68%	14.24%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	13.18%	14.15%	13.67%	13.68%	
6	Tier 1 ratio (%)	14.36%	15.39%	14.93%	15.01%	15.71%
6b	Tier 1 ratio considering unfloored TREA (%)	14.36%	15.39%	14.93%	15.01%	
7	Total capital ratio (%)	16.34%	17.54%	15.92%	16.12%	17.03%
7b	Total capital ratio considering unfloored TREA (%)	16.34%	17.54%	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 (%)	1.02%	1.01%	0.08%	0.08%	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 (%)	4.02%	4.01%	3.08%	3.08%	3.09%
EU-11a	Overall capital requirements (%)	12.02%	12.01%	11.08%	11.08%	11.09%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.34%	9.39%	7.92%	8.12%	9.03%
	Leverage ratio					
13	Total exposure measure	306 117 076	285 241 160	279 808 594	264 039 199	262 968 011
14	Leverage ratio (%)	5.95%	6.53%	6.35%	6.39%	6.12%
	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)	98 299	94 117	91 867	89 097	86 562
EU-16a	Cash outflows - Total weighted value	45 491	43 894	42 948	42 231	41 403
EU-16b	Cash inflows - Total weighted value	2 852	2 606	2 557	2 569	2 397
16	Total net cash outflows (adjusted value)	42 639	41 289	40 391	39 662	39 006
17	Liquidity coverage ratio (%)	230%	228%	227%	225%	222%
	Net Stable Funding Ratio					
18	Total available stable funding	215 093	200 396	196 031	188 395	188 761
19	Total required stable funding	123 673	124 367	121 514	118 135	114 388
20	NSFR ratio (%)	174%	161%	161%	159%	165%

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 total risk exposure amounts

		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)	95 872 909	95 684 242	7 669 833
2	Of which the standardised approach	29 601 556	30 799 783	2 368 124
3	Of which the Foundation IRB (F-IRB) approach	2 108 803	2 060 242	168 704
4	Of which slotting approach	6 352 046	6 856 841	508 164
EU 4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	57 810 505	55 967 376	4 624 840
6	Counterparty credit risk - CCR	1 426 966	1 443 439	114 157
7	Of which the standardised approach	1 276 975	1 238 460	102 158
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	4 977	3 536	398
9	Of which other CCR	145 014	201 443	11 601
10	Credit valuation adjustments risk - CVA risk	275 667	233 152	22 053
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	275 667	233 152	22 053
EU 10c	Of which the simplified approach	-	-	-
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	5 082 919	4 951 869	406 634
17	Of which SEC-IRBA approach	4 590 211	4 951 869	367 217
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	492 708	-	39 417
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	1 036 319	1 100 820	82 906
21	Of which the Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S-SA)	1 036 319	1 100 820	82 906
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	23 190 335	17 717 298	1 855 227
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	3 954 845	3 318 018	316 388
26	Output floor applied (%)	50%	50%	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	Total	126 885 115	121 130 820	10 150 809

EU CR10 – Specialized lending and equities, addressing disclosure requirements of Art. 438(e) of CRR Regulation.**EU CR10.2**

Specialised lending : Income-producing real estate and high volatility commercial real estate (Slotting approach)							
Regulatory categories	Remaining maturity	On-balancesheet exposure	Off-balancesheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
		a	b	c	d	e	f
Category 1	Less than 2.5 years	27 893	28 585	50%	40 986	18 305	-
	Equal to or more than 2.5 years	436 858	54 074	70%	463 895	285 835	1 856
Category 2	Less than 2.5 years	2 490 393	2 292 136	70%	3 507 036	2 361 215	14 028
	Equal to or more than 2.5 years	3 444 873	423 020	90%	3 620 456	2 918 355	28 964
Category 3	Less than 2.5 years	285 970	30 408	115%	298 416	297 278	8 356
	Equal to or more than 2.5 years	468 762	150	115%	468 884	471 057	13 129
Category 4	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Category 5	Less than 2.5 years	313 404	3 000	-	314 004	-	157 002
	Equal to or more than 2.5 years	87 792	50	-	87 842	-	43 921
Total	Less than 2.5 years	3 117 660	2 354 129		4 160 442	2 676 798	179 386
	Equal to or more than 2.5 years	4 438 286	477 293		4 641 077	3 675 247	87 869

EU CR10.5

Equity exposures under Articles 133 (3) to (6) and Article 495a(3) CRR						
Equity exposures	On-balancesheet exposure	Off-balancesheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
	a	b	c	d	e	f
Total	388 583	-	250%	388 583	971 458	-

Tables in accordance with: EU CR10.1 template, EU CR10.3 template, and EU CR10.4 template are not presented due to the absence of corresponding exposures in mBank Group's portfolio under the advanced AIRB model approach.

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
		31.12.2025
1	Risk weighted exposure amount as at the end of the previous reporting period	60 634 879
2	Asset size (+/-)	628 254
3	Asset quality (+/-)	587 825
4	Model updates (+/-)	-
5	Methodology and policy (+/-)	-
6	Acquisitions and disposals (+/-)	-
7	Foreign exchange movements (+/-)	(103 516)
8	Other (+/-)	753
9	Risk weighted exposure amount as at the end of the reporting period	61 748 195

The percentage coverage of the mBank Group's loan portfolios by the IRB approach is presented below, addressing disclosure requirements of art. 452 letter b) of CRR Regulation.

IRB stage	Asset class	% share in risk-weighted assets (% of RWA STA)
IRB first stage portfolios	mBank Group exposures, including:	
	AIRB	59%
	Corporate exposures	23%
	Specialised lending exposures – income producing real estate	6%
	Retail exposures – mortgage loans	5%
	Retail exposures – non-mortgage loans	11%
	Retail exposures of microenterprises – mortgage loans	1%
	Retail exposures of microenterprises – non-mortgage loans	6%
	Bank exposures	0%
	Exposures of mLeasing	7%
	FIRB	2%
	Bank exposures	1%
	Corporate exposures	1%
	Non-credit assets	4%
	Securitisation	5%
	IRB first stage	70%
	mBH - Retail exposures – mortgage loans	3%
Roll-out	3%	
Permanent partial use	27%	
Total	100%	

5.6 Information about the structure of risk-weighted assets

Templates below provide more information on risk weighted assets, applied approaches to calculate RWA and the scope of credit risk and counterparty credit risk mitigation techniques in place.

EU CR4 – Standardised approach – Credit risk exposure and counterparty credit risk with CRM effects, addressing disclosure requirements of art. 453 letters g) to i) and art. 444 letter e) of CRR Regulation.

	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	125 595 974	40	125 688 184	18 957	3 574 698	2.84%
2	Non-central government public sector entities	32 297	20 647	32 297	8 259	8 220	20.27%
EU 2a	Regional governments or local authorities	32 186	20 022	32 186	8 009	8 039	20.00%
EU 2b	Public sector entities	111	625	111	250	181	50.00%
3	Multilateral development banks	5 308 702	-	5 308 702	-	-	-
EU 3a	International organisations	343 869	-	343 869	-	-	-
4	Institutions	517 261	48 718	760 142	18 312	291 544	37.45%
5	Covered bonds	-	-	-	-	-	-
6	Corporates	9 305 857	12 995 701	8 976 351	4 044 737	12 660 007	97.23%
6.1	Of which: Specialised Lending	1 522 598	1 491 613	1 522 598	675 254	2 183 725	99.36%
7	Subordinated debt exposures and equity	388 583	-	388 583	-	971 458	250.00%
EU 7a	Subordinated debt exposures	-	-	-	-	-	-
EU 7b	Equity	388 583	-	388 583	-	971 458	250.00%
8	Retail	5 571 644	2 488 054	5 507 744	1 023 924	4 993 904	76.46%
9	Secured by mortgages on immovable property and ADC exposures	16 416 597	364 141	16 389 727	136 146	6 446 870	39.01%
9.1	Secured by mortgages on residential immovable property - non IPRE	15 523 345	27 318	15 523 345	13 659	5 130 382	33.02%
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	262 425	50 063	250 582	20 388	239 639	88.44%
9.4	Secured by mortgages on commercial immovable property - IPRE	630 796	-	615 770	-	923 654	150.00%
9.5	Acquisition, Development and Construction (ADC)	31	286 760	31	102 099	153 194	150.00%
10	Exposures in default	358 052	22 147	353 283	1 645	408 185	115.01%
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-
EU 10c	Inne pozycje	242 139	11 330	242 139	4 532	246 671	100.00%
12	OGÓLEM	164 080 976	15 950 779	163 991 021	5 256 512	29 601 556	17.49%

mBank S.A. Group

Disclosures regarding capital adequacy as at 31 December 2025

(PLN thousand)

EU CR5 - Standardised approach, addressing disclosure requirements of art. 444 letter e) of CRR Regulation and presents regulatory exposure values post conversion factor and post risk mitigation techniques for a part of credit and credit counterparty portfolio where mBank Group applies standardized approach, broken town by assets classes and risk weights.

	Exposure classes	Risk weight													
		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%
		a	b	c	d	e	f	g	h	i	j	k	l	m	n
1	Central governments or central banks	120 479 323	-	3 257 822	-	643 741	-	-	-	-	-	-	-	-	-
2	Non-central government public sector entities	-	-	-	-	40 195	-	-	-	-	361	-	-	-	-
EU 2a	Regional governments or local authorities	-	-	-	-	40 195	-	-	-	-	-	-	-	-	-
EU 2b	Public sector entities	-	-	-	-	-	-	-	-	-	361	-	-	-	-
3	Multilateral development banks	5 308 702	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 3a	International organisations	343 869	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Institutions	17 764	192 700	-	-	202 585	106 316	-	27 597	-	142 998	-	-	-	-
5	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Corporates	-	-	-	-	-	-	-	-	-	69 095	-	-	617	-
6.1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU-7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	6 145 570	-
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	11 868 776	-	-	-	-	25 777	-	3 657 036	-	-
9.1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	11 868 776	-	-	-	-	-	-	3 657 036	-	-
9.1.1	no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	9 053	-	-
9.1.2	loan splitting applied (secured)	-	-	-	-	11 868 776	-	-	-	-	-	-	291 332	-	-
9.1.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	3 356 651	-	-
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-	25 777	-	-	-	-
9.3.1	no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	25 777	-	-	-	-
9.3.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU-10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10c	Other items	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 11c	TOTAL	126 149 658	192 700	3 257 822	-	12 755 297	106 316	-	27 597	-	212 454	25 777	-	9 803 223	-

EU CR5 - Standardised approach (contd):

	Exposure classes	Risk weight											Total	Of which unrated
		90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Others		
		o	p	q	r	s	t	u	v	w	x	y		
1	Central governments or central banks	-	-	-	-	-	-	1 326 255	-	-	-	-	125 707 141	1 438 872
2	Non-central government public sector entities	-	-	-	-	-	-	-	-	-	-	-	40 556	1 223
EU 2a	Regional governments or local authorities	-	-	-	-	-	-	-	-	-	-	-	40 195	1 223
EU 2b	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	361	-
3	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	5 308 702	-
EU 3a	International organisations	-	-	-	-	-	-	-	-	-	-	-	343 869	343 869
4	Institutions	-	-	-	-	-	88 493	-	-	-	-	-	778 454	603 602
5	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Corporates	-	12 024 316	-	-	927 059	-	-	-	-	-	-	13 021 088	12 838 185
6.1	Of which: Specialised Lending	-	1 270 792	-	-	927 059	-	-	-	-	-	-	2 197 851	2 197 851
7	Subordinated debt exposures and equity	-	-	-	-	-	-	388 583	-	-	-	-	388 583	388 583
EU-7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	388 583	-	-	-	-	388 583	388 583
8	Retail exposures	-	386 098	-	-	-	-	-	-	-	-	-	6 531 668	6 531 668
9	Secured by mortgages on immovable property and ADC exposures	-	256 386	-	-	-	-	717 899	-	-	-	-	16 525 874	16 525 874
9.1	Secured by mortgages on residential immovable property - non IPRE	-	11 192	-	-	-	-	-	-	-	-	-	15 537 004	15 537 004
9.1.1	no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	9 053	9 053
9.1.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	-	12 160 108	12 160 108
9.1.3	loan splitting applied (unsecured)	-	11 192	-	-	-	-	-	-	-	-	-	3 367 843	3 367 843
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	245 194	-	-	-	-	-	-	-	-	-	270 971	270 971
9.3.1	no loan splitting applied	-	33 566	-	-	-	-	-	-	-	-	-	33 566	33 566
9.3.2	loan splitting applied (secured)	-	12 436	-	-	-	-	-	-	-	-	-	38 213	38 213
9.3.3	loan splitting applied (unsecured)	-	199 192	-	-	-	-	-	-	-	-	-	199 192	199 192
9.4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	615 770	-	-	-	-	-	615 770	615 770
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	102 130	-	-	-	-	-	102 130	102 130
10	Exposures in default	-	302 389	-	-	-	52 538	-	-	-	-	-	354 927	354 927
EU-10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10c	Other items	-	246 671	-	-	-	-	-	-	-	-	-	246 671	246 671
EU 11c	TOTAL	-	13 215 860	-	-	927 059	858 931	1 714 838	-	-	-	-	169 247 533	39 273 474

EU CR6 – IRB approach – Credit risk and counterparty credit exposures by exposure class and PD range, addressing disclosure requirements of art. 452 letter g) and i) to v) of CRR Regulation.

The table below presents exposure values, the amount of undrawn commitments, the average CCF, PD and LGD in percentage, risk-weighted exposure values for particular exposure classes for a part of credit and counterparty credit portfolio where mBank Group applies IRB approach.

A-IRB	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
Corporates - General													
	0.00 to <0.15	793 429	2 459 458	50.05%	2 024 270	0.09%	454	53.48%	2	493 989	24.40%	935	(546)
	0.00 to <0.10	489 114	1 407 742	51.51%	1 214 297	0.07%	292	57.31%	2	255 064	21.01%	465	(384)
	0.10 to <0.15	304 316	1 051 716	48.08%	809 973	0.12%	162	47.73%	2	238 925	29.50%	469	(162)
	0.15 to <0.25	1 017 169	1 443 067	51.13%	1 754 972	0.20%	315	51.91%	2	833 282	47.48%	1 804	(1 123)
	0.25 to <0.50	2 049 113	4 283 802	39.12%	3 724 809	0.37%	973	52.04%	2	2 422 953	65.05%	7 169	(4 126)
	0.50 to <0.75	1 769 203	2 594 382	48.31%	3 022 636	0.62%	1 105	50.97%	2	2 380 631	78.76%	9 486	(5 481)
	0.75 to <2.50	7 334 355	6 012 139	53.20%	10 532 672	1.51%	4 148	49.91%	2	10 423 096	98.96%	79 540	(41 547)
	0.75 to <1.75	4 838 869	4 430 240	53.24%	7 197 438	1.22%	2 898	49.49%	2	6 721 093	93.38%	43 258	(24 503)
	1.75 to <2.5	2 495 486	1 581 898	53.08%	3 335 234	2.13%	1 250	50.81%	2	3 702 003	111.00%	36 283	(17 044)
	2.50 to <10.00	5 121 047	3 178 787	53.45%	6 820 055	4.46%	2 978	45.78%	2	8 050 173	118.04%	137 884	(72 491)
	2.5 to <5	3 621 747	2 322 666	52.98%	4 852 407	3.50%	2 090	46.67%	2	5 488 609	113.11%	79 163	(42 707)
	5 to <10	1 499 300	856 121	54.71%	1 967 648	6.84%	888	43.57%	2	2 561 564	130.18%	58 722	(29 784)
	10.00 to <100.00	780 100	251 210	61.24%	933 931	16.88%	671	43.82%	2	1 690 230	180.98%	69 662	(29 624)
	10 to <20	545 683	130 079	71.46%	638 642	13.57%	354	42.18%	2	1 003 681	157.16%	36 227	(16 771)
	20 to <30	201 929	104 805	46.63%	250 797	21.49%	102	47.77%	2	594 492	237.04%	25 460	(8 584)
	30.00 to <100.00	32 489	16 326	73.52%	44 491	38.34%	215	45.16%	2	92 057	206.91%	7 975	(4 268)
	100.00 (Default)	1 109 747	105 217	55.56%	1 168 205	100.00%	572	61.79%	1	1 017 113	87.07%	664 267	(722 795)
	Subtotal	19 974 165	20 328 061	49.23%	29 981 549	6.09%	11 216	49.97%	2	27 311 468	-	970 748	(877 734)

EU CR6 – IRB approach – Credit risk and counterparty credit exposures by exposure class and PD range (contd):

A-IRB	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
Retail – Secured by residential immovable property													
	0.00 to <0.15	16 505 028	257 582	50.02%	16 633 881	0.09%	85 192	29.68%	-	1 154 829	6.94%	4 585	(3 367)
	0.00 to <0.10	10 401 321	161 684	50.00%	10 482 163	0.08%	54 900	28.95%	-	614 138	5.86%	2 325	(1 721)
	0.10 to <0.15	6 103 706	95 898	50.06%	6 151 717	0.12%	30 292	30.93%	-	540 691	8.79%	2 260	(1 647)
	0.15 to <0.25	4 284 670	77 243	50.16%	4 323 411	0.19%	26 276	28.39%	-	505 213	11.69%	2 386	(1 849)
	0.25 to <0.50	4 077 351	64 987	50.27%	4 110 020	0.35%	21 404	29.10%	-	757 949	18.44%	4 203	(6 975)
	0.50 to <0.75	1 230 475	9 217	51.29%	1 235 203	0.61%	6 987	28.44%	-	328 607	26.60%	2 132	(5 919)
	0.75 to <2.50	1 453 468	7 726	52.32%	1 457 510	1.23%	8 677	27.96%	-	602 470	41.34%	4 994	(9 173)
	0.75 to <1.75	1 238 043	7 372	52.07%	1 241 882	1.08%	7 314	27.93%	-	475 118	38.26%	3 731	(7 051)
	1.75 to <2.5	215 425	354	57.51%	215 629	2.09%	1 363	28.10%	-	127 352	59.06%	1 264	(2 122)
	2.50 to <10.00	452 507	2 010	57.63%	453 665	4.79%	2 979	27.49%	-	410 106	90.40%	5 984	(8 681)
	2.5 to <5	288 422	1 613	59.49%	289 380	3.54%	1 879	27.41%	-	226 217	78.17%	2 809	(4 382)
	5 to <10	164 086	397	50.04%	164 284	6.99%	1 100	27.63%	-	183 889	111.93%	3 175	(4 299)
	10.00 to <100.00	269 471	1 578	55.17%	270 341	32.48%	1 764	25.63%	-	372 500	137.79%	21 388	(16 077)
	10 to <20	101 261	346	63.18%	101 479	14.12%	634	27.35%	-	148 307	146.14%	3 919	(4 120)
	20 to <30	51 579	281	62.28%	51 754	24.91%	335	27.53%	-	86 601	167.33%	3 556	(2 970)
	30.00 to <100.00	116 631	951	50.16%	117 108	51.74%	795	23.30%	-	137 592	117.49%	13 912	(8 987)
	100.00 (Default)	436 570	1 534	51.90%	437 367	100.00%	2 515	55.98%	-	215 044	49.17%	228 437	(164 942)
	Subtotal	28 709 540	421 876	50.22%	28 921 396	2.11%	155 794	29.59%	-	4 346 717	-	274 108	(216 983)

EU CR6 – IRB approach – Credit risk and counterparty credit exposures by exposure class and PD range (contd):

A-IRB	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
Retail – Qualifying revolving (QRRE)													
	0.00 to <0.15	34 190	136 289	36.83%	84 388	0.11%	22 153	58.01%	-	3 304	3.91%	53	(40)
	0.00 to <0.10	-	-	-	-	-	-	-	-	-	-	-	-
	0.10 to <0.15	34 190	136 289	36.83%	84 388	0.11%	22 153	58.01%	-	3 304	3.91%	53	(40)
	0.15 to <0.25	168 026	993 093	25.45%	420 804	0.20%	117 424	64.73%	-	30 812	7.32%	551	(486)
	0.25 to <0.50	351 568	1 748 444	37.92%	1 014 626	0.37%	221 845	63.24%	-	117 519	11.58%	2 365	(2 104)
	0.50 to <0.75	251 075	720 396	47.96%	596 596	0.61%	109 230	67.18%	-	110 388	18.50%	2 465	(1 998)
	0.75 to <2.50	982 649	993 782	70.77%	1 685 871	1.45%	238 765	71.39%	-	636 794	37.77%	17 635	(24 506)
	0.75 to <1.75	657 394	828 312	64.23%	1 189 404	1.19%	178 501	70.60%	-	382 729	32.18%	9 995	(11 574)
	1.75 to <2.5	325 255	165 471	103.47%	496 468	2.10%	60 264	73.30%	-	254 065	51.17%	7 640	(12 931)
	2.50 to <10.00	835 901	160 707	196.52%	1 151 698	4.68%	116 546	75.40%	-	1 038 613	90.18%	40 820	(66 258)
	2.5 to <5	538 655	124 102	172.84%	753 145	3.50%	77 940	74.89%	-	563 221	74.78%	19 741	(35 186)
	5 to <10	297 245	36 605	276.78%	398 553	6.93%	38 606	76.36%	-	475 391	119.28%	21 079	(31 072)
	10.00 to <100.00	273 082	18 611	326.07%	333 765	24.23%	29 990	76.01%	-	657 607	197.03%	61 306	(53 703)
	10 to <20	146 875	12 747	336.23%	189 732	14.10%	18 208	76.24%	-	336 912	177.57%	20 415	(22 338)
	20 to <30	52 930	2 729	357.53%	62 689	24.18%	5 592	75.92%	-	139 665	222.79%	11 498	(10 605)
	30.00 to <100.00	73 276	3 135	257.39%	81 344	47.90%	6 190	75.54%	-	181 031	222.55%	29 393	(20 760)
	100.00 (Default)	171 967	13 169	153.94%	192 236	100.00%	11 753	83.84%	-	466 776	242.81%	125 607	(108 168)
	Subtotal	3 068 458	4 784 491	50.40%	5 479 984	6.57%	867 706	70.27%	-	3 061 812	-	250 803	(257 263)

EU CR6 – IRB approach – Credit risk and counterparty credit exposures by exposure class and PD range (contd):

A-IRB	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
Retail - Other retail exposures													
	0.00 to <0.15	4 584 582	662 732	49.15%	4 910 302	0.10%	36 445	39.28%	-	501 546	10.21%	1 940	(964)
	0.00 to <0.10	2 296 448	391 272	48.81%	2 487 421	0.08%	16 053	39.04%	-	214 999	8.64%	782	(399)
	0.10 to <0.15	2 288 134	271 460	49.64%	2 422 881	0.12%	20 392	39.52%	-	286 546	11.83%	1 158	(565)
	0.15 to <0.25	1 668 486	251 615	43.64%	1 778 286	0.19%	23 271	37.01%	-	273 184	15.36%	1 272	(740)
	0.25 to <0.50	2 776 085	1 128 438	44.11%	3 273 794	0.38%	68 749	35.70%	-	693 677	21.19%	4 432	(4 635)
	0.50 to <0.75	2 754 350	803 543	49.19%	3 149 628	0.62%	138 462	40.99%	-	1 005 653	31.93%	8 125	(8 801)
	0.75 to <2.50	10 156 940	1 345 726	58.68%	10 946 592	1.45%	649 583	61.79%	-	7 559 040	69.05%	100 259	(95 433)
	0.75 to <1.75	7 198 329	1 100 971	57.19%	7 827 961	1.20%	454 023	60.07%	-	4 945 058	63.17%	57 303	(52 653)
	1.75 to <2.5	2 958 612	244 755	65.38%	3 118 631	2.08%	195 560	66.09%	-	2 613 981	83.82%	42 955	(42 780)
	2.50 to <10.00	4 708 491	232 519	83.88%	4 903 524	4.47%	320 372	62.28%	-	4 211 620	85.89%	134 438	(174 792)
	2.5 to <5	3 273 719	185 055	78.63%	3 419 222	3.42%	197 239	63.61%	-	2 940 644	86.00%	74 115	(91 743)
	5 to <10	1 434 772	47 464	104.35%	1 484 302	6.86%	123 133	59.21%	-	1 270 975	85.63%	60 323	(83 048)
	10.00 to <100.00	1 295 014	22 203	105.38%	1 318 413	23.02%	80 469	55.02%	-	1 440 871	109.29%	177 985	(176 340)
	10 to <20	763 327	15 401	106.35%	779 709	14.27%	47 125	52.79%	-	747 418	95.86%	58 471	(70 285)
	20 to <30	274 870	2 304	146.29%	278 239	24.23%	16 011	52.35%	-	328 920	118.21%	35 226	(38 066)
	30.00 to <100.00	256 817	4 497	81.11%	260 465	47.89%	17 333	64.58%	-	364 533	139.95%	84 288	(67 989)
	100.00 (Default)	1 584 956	17 191	111.23%	1 604 076	100.00%	49 467	73.92%	-	2 951 144	183.98%	975 850	(888 857)
	Subtotal	29 528 905	4 463 966	52.77%	31 884 615	7.30%	1 366 818	52.61%	-	18 636 734	-	1 404 301	(1 350 61)
	Total	81 281 068	29 998 395		96 267 545		2 401 534			53 356 731		2 899 960	(2 702 541)

EU CR6 – IRB approach – Credit risk and counterparty credit exposures by exposure class and PD range (contd):

F-IRB	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
Institutions													
	0.00 do <0.15	339 983	4 548 364	36.51%	2 000 515	0.05%	94	45.00%	3	601 144	30.05%	462	(111)
	0.00 do <0.10	334 721	4 379 062	37.24%	1 965 281	0.05%	86	45.00%	3	592 026	30.12%	442	(86)
	0.10 do <0.15	5 262	169 303	17.70%	35 233	0.12%	8	45.00%	1	9 117	25.88%	19	(24)
	0.15 do <0.25	5 440	1 024	49.02%	5 942	0.17%	4	45.00%	1	1 719	28.93%	4	(6)
	0.25 do <0.50	170 695	50 000	40.00%	190 695	0.31%	3	45.00%	1	98 078	51.43%	262	(201)
	0.50 do <0.75	8 497	8 459	42.91%	12 126	0.63%	5	45.00%	1	7 431	61.28%	34	(33)
	0.75 do <2.50	32 623	5 429	35.99%	34 577	1.84%	7	45.00%	4	44 891	129.83%	287	(26)
	0.75 do <1.75	6 420	5 409	35.97%	8 366	0.93%	3	45.00%	1	5 915	70.71%	35	(26)
	1.75 do <2.5	26 203	20	40.00%	26 211	2.14%	4	45.00%	5	38 976	148.70%	252	-
	2.50 do <10.00	-	4 703	20.00%	941	2.74%	1	45.00%	1	1 003	106.58%	12	(14)
	2.5 do <5	-	4 703	20.00%	941	2.74%	1	45.00%	1	1 003	106.58%	12	(14)
	5 do <10	-	-	-	-	-	-	-	-	-	-	-	-
	10.00 do <100.00	730	-	-	730	47.34%	3	45.00%	5	1 890	259.04%	155	-
	10 do <20	-	-	-	-	-	-	-	-	-	-	-	-
	20 do <30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 do <100.00	730	-	-	730	47.34%	3	45.00%	5	1 890	259.04%	155	-
	100.00 (Default)	-	-	-	-	-	-	-	-	-	-	-	-
	Subtotal	557 967	4 617 980	36.54%	2 245 525	0.12%	117	45.00%	3	756 155		1 217	(391)

EU CR6 – IRB approach – Credit risk and counterparty credit exposures by exposure class and PD range (contd):

F-IRB	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
Corporates - General													
	0.00 do <0.15	3 512	330 071	34.42%	117 124	0.11%	7	40.00%	3	35 998	30.73%	52	(448)
	0.00 do <0.10	3 164	81 633	45.06%	39 951	0.05%	3	40.00%	1	4 325	10.83%	8	(1)
	0.10 do <0.15	348	248 438	30.92%	77 173	0.14%	4	40.00%	4	31 673	41.04%	44	(447)
	0.15 do <0.25	18 328	271 147	43.36%	135 897	0.18%	4	40.00%	1	39 058	28.74%	95	(134)
	0.25 do <0.50	256 578	688 077	28.59%	453 333	0.30%	15	40.00%	4	265 688	58.61%	536	(269)
	0.50 do <0.75	52 919	46 542	40.00%	71 535	0.56%	6	39.39%	1	41 174	57.56%	132	(62)
	0.75 do <2.50	565 527	697 690	34.53%	806 450	1.19%	30	39.97%	2	627 174	77.77%	3 725	(3 379)
	0.75 do <1.75	554 387	623 911	36.45%	781 798	1.17%	25	39.97%	2	606 578	77.59%	3 540	(3 214)
	1.75 do <2.5	11 140	73 779	18.31%	24 651	1.89%	5	40.00%	1	20 595	83.55%	186	(165)
	2.50 do <10.00	191 006	172 498	41.31%	262 269	5.47%	11	39.40%	2	342 525	130.60%	5 488	(2 546)
	2.5 do <5	102 996	147 988	41.53%	164 456	3.47%	7	39.21%	2	180 392	109.69%	2 238	(1 799)
	5 do <10	88 009	24 510	40.00%	97 814	8.84%	4	39.72%	2	162 133	165.76%	3 250	(747)
	10.00 do <100.00	-	1 367	41.83%	572	46.20%	2	35.63%	3	1 031	180.38%	95	(94)
	10 do <20	-	-	-	-	-	-	-	-	-	-	-	-
	20 do <30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 do <100.00	-	1 367	41.83%	572	46.20%	2	35.63%	3	1 031	180.38%	95	(94)
	100.00 (Default)	-	-	-	-	-	-	-	-	-	-	-	-
	Subtotal	1 087 870	2 207 391	34.40%	1 847 180	1.43%	75	39.88%	2	1 352 647	-	10 124	(6 933)
	Total	1 645 837	6 825 371		4 092 704		192			2 108 803		11 341	(7 324)

EU CR6-A – The scope of application of the IRB method and the standardized method

		Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to IRB Approach (%)	Percentage of total exposure value subject to a roll-out plan (%)
		a	b	c	d	e
1	Central governments or central banks	-	130 448 578	100.00%	-	-
2	Regional governments and local authorities	-	38 972	100.00%	-	-
3	Public sector entities	-	361	100.00%	-	-
4	Institutions	-	2 779 986	19.23%	80.77%	-
5	Corporates	40 527 953	56 594 788	19.81%	71.61%	8.58%
5,1	Of which Corporates - General	-	37 725 597	-	-	-
5,2	Of which Corporates - Specialised lending	-	13 680 222	0.90%	63.59%	35.51%
5.2.1	Of which Corporates - Specialised lending, excluding slotting approach	-	92	100.00%	-	-
5.2.2	Of which Corporates - Specialised lending under slotting approach	-	13 680 129	-	-	-
5.3	Of which Corporates - Purchased Receivables	-	5 188 970	100.00%	-	-
6	Retail	66 285 996	87 354 051	12.56%	75.88%	11.55%
6.1	of which Retail – Qualifying revolving	-	5 479 984	-	100.00%	-
6.2	of which Retail – Secured by residential immovable property	-	39 011 344	-	-	-
6.3	Of which Retail - Purchased Receivables	-	-	-	-	-
6.4	of which Retail - Other retail exposures	31 884 615	42 862 722	42.38%	157.61%	0.01%
7	Equity	-	388 583	100.00%	-	-
EU-7a	Collective investment undertakings (CIU)	-	-	-	-	-
8	Other non-credit obligation assets	5 742 352	6 542 335	12.23%	87.77%	-
9	Total	114 801 825	284 147 656	54.34%	40.40%	5.26%

EU CR7 – IRB approach – Effect on the RWAs of credit derivatives used as CRM techniques, addressing disclosure requirements of art. 453 letter j) of CRR Regulation.

mBank Group does not disclose this information as credit derivatives are not used as CRM techniques with an impact on RWA.

EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques, addressing disclosure requirements of art. 453 letter g) of CRR Regulation.

A-IRB		Total exposures	Credit risk Mitigation techniques				
			Funded credit Protection (FCP)				
			Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)
			a	b	c	d	e
1	Central governments and central banks	-	-	-	-	-	-
2	Regional governments and local authorities	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-
5	Corporates	38 680 773	2.50%	462.24%	413.20%	5.97%	43.07%
5.1	<i>Corporates – General</i>	29 981 549	3.23%	545.53%	482.36%	7.61%	55.57%
5.2	<i>Corporates – Specialised lending</i>	8 699 224	0.00%	175.16%	174.84%	0.32%	-
5.3	<i>Corporates - Purchased Receivables</i>	-	-	-	-	-	-
6	Retail	66 285 996	-	118.46%	107.75%	-	10.71%
6.1	<i>Retail – Qualifying revolving</i>	5 479 984	-	-	-	-	-
6.2	<i>Retail – secured by residential immovable property</i>	28 921 396	-	225.39%	225.39%	-	-
6.3	<i>Retail - Purchased Receivables</i>	-	-	-	-	-	-
6.4	<i>Retail - Other retail exposures</i>	31 884 615	-	41.84%	19.57%	-	22.27%
7	Total	104 966 769	0.92%	245.15%	220.31%	2.20%	22.63%

EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques (contd):

A-IRB		Credit risk Mitigation techniques						Credit risk Mitigation methods in the calculation of RWEAs	
		Funded credit Protection (FCP)				Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
		Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)		
								g	h
1	Central governments and central banks	-	-	-	-	-	-	-	-
2	Regional governments and local authorities	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-
5	Corporates	-	-	-	-	8.31%	-	33 592 395	33 592 395
5.1	<i>Corporates – General</i>	-	-	-	-	10.72%	-	27 311 468	27 311 468
5.2	<i>Corporates – Specialised lending</i>	-	-	-	-	-	-	6 280 927	6 280 927
5.3	<i>Corporates - Purchased Receivables</i>	-	-	-	-	-	-	-	-
6	Retail	-	-	-	-	-	-	26 045 263	26 045 263
6.1	<i>Retail – Qualifying revolving</i>	-	-	-	-	-	-	3 061 812	3 061 812
6.2	<i>Retail – secured by residential immovable property</i>	-	-	-	-	-	-	4 346 717	4 346 717
6.3	<i>Retail - Purchased Receivables</i>	-	-	-	-	-	-	-	-
6.4	<i>Retail - Other retail exposures</i>	-	-	-	-	-	-	18 636 734	18 636 734
7	Total	-	-	-	-	3.06%	-	59 637 658	59 637 658

EU CR7-A – F-IRB approach – Disclosure of the extent of the use of CRM techniques:

F-IRB		Total exposures	Credit risk Mitigation techniques					Part of exposures covered by Other funded credit protection (%)
			Funded credit Protection (FCP)					
			Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)	
1	Central governments and central banks	-	-	-	-	-	-	-
2	Regional governments and local authorities	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-
4	Institutions	2 245 525	-	-	-	-	-	-
5	Corporates	1 847 180	0.07%	3 749.55%	55.75%	0.81%	3 692.99%	-
5.1	<i>Corporates – General</i>	1 847 180	0.07%	3 749.55%	55.75%	0.81%	3 692.99%	-
5.2	<i>Corporates – Specialised lending</i>	-	-	-	-	-	-	-
5.3	<i>Corporates - Purchased Receivables</i>	-	-	-	-	-	-	-
6	Total	4 092 704	0.03%	1 692.30%	25.16%	0.37%	1 666.77%	-

EU CR7-A – F-IRB approach – Disclosure of the extent of the use of CRM techniques (contd):

F-IRB		Credit risk Mitigation techniques					Credit risk Mitigation methods in the calculation of RWEAs	
		Funded credit Protection (FCP)			Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
		Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)		
		1	Central governments and central banks	-	-	-	-	-
2	Regional governments and local authorities	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-
4	Institutions	-	-	-	-	-	756 155	756 155
5	Corporates	-	-	-	-	-	1 352 647	1 352 647
5.1	<i>Corporates – General</i>	-	-	-	-	-	1 352 647	1 352 647
5.2	<i>Corporates – Specialised lending</i>	-	-	-	-	-	-	-
5.3	<i>Corporates - Purchased Receivables</i>	-	-	-	-	-	-	-
6	Total	-	-	-	-	-	2 108 803	2 108 803

mBank S.A. Group

Disclosures regarding capital adequacy as at 31 December 2025

(PLN thousand)

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)	66 271 353	29 601 556	95 872 909	107 362 048	105 424 400
2	Counterparty credit risk	761 306	665 660	1 426 966	1 560 613	1 560 613
3	Credit valuation adjustment		275 667	275 667	275 667	275 667
4	Securitisation exposures in the banking book	5 082 919	-	5 082 919	3 614 599	3 614 599
5	Market risk	-	1 036 319	1 036 319	1 036 319	1 036 319
6	Operational risk		23 190 335	23 190 335	23 190 335	23 190 335
7	Other risk weighted exposure amounts		-	-	-	-
8	Total	72 115 578	54 769 536	126 885 115	137 039 581	135 101 933

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	-	15 550	3 574 698	3 590 248	3 590 248
EU 1a	Regional governments or local authorities	-	-	8 039	8 039	8 039
EU 1b	Public sector entities	-	76	181	256	256
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	756 155	870 841	1 047 699	1 162 385	1 162 385
3	Equity	-	-	971 458	971 458	971 458
5	Corporates	34 945 042	22 915 818	47 605 049	37 369 128	35 575 825
5.1	Of which: F-IRB is applied	1 352 647	1 489 286	1 352 647	1 722 444	1 489 286
5.2	Of which: A-IRB is applied	33 592 395	21 426 532	33 592 395	22 986 678	21 426 532
EU 5a	Of which: Corporates - General	28 664 115	22 915 818	39 140 397	35 185 403	33 392 100
EU 5b	Of which: Corporates - Specialised lending	6 280 927	-	8 464 651	2 183 725	2 183 725
EU 5c	Of which: Corporates - Purchased receivables	-	-	-	-	-
6	Retail	26 045 263	23 487 410	31 039 166	28 481 314	28 481 314
6.1	Of which: Retail - Qualifying revolving	3 061 812	3 506 817	3 061 812	3 506 817	3 506 817
EU 6.1a	Of which: Retail - Purchased receivables	-	-	-	-	-
EU 6.1b	Of which: Retail - Other	18 636 734	10 832 264	18 636 734	15 826 167	19 980 593
6.2	Of which: Retail - Secured by residential real estate	4 346 717	9 148 329	4 346 717	9 148 329	9 148 329
EU 7a	Categorised as secured by immovable properties and ADC exposures in SA	-	22 120 493	6 446 870	28 711 707	28 567 363
EU 7b	Collective investment undertakings (CIU)	-	-	-	-	-
EU 7c	Categorised as exposures in default in SA	-	1 976 105	408 185	2 384 290	2 384 290
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	4 524 893	4 436 551	4 771 564	4 683 221	4 683 221
9	Total	66 271 353	75 822 844	95 872 909	107 362 048	105 424 400

6. Leverage ratio

The table below provides synthetic information on the measure of total exposure that makes up the Tier 1 capital ratio and the leverage ratio.

EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

		a
		Applicable amount
1	Total assets as per published financial statements	280 253 227
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	-
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)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustment for derivative financial instruments	3 661 706
9	Adjustment for securities financing transactions (SFTs)	225 468
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	23 026 498
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(1 049 823)
13	Total exposure measure	306 117 076

The table below presents a breakdown of the total exposure measure applied to calculation of the leverage ratio, information on Tier 1 capital, leverage ratio and how the institution applies Article 499(2) of the CRR Regulation.

EU LR2 - LRCom: Leverage ratio common disclosure

		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)	266 589 198	232 607 574
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	-
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(1 582 127)	(1 398 503)
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	265 007 071	231 209 071
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	2 579 476	2 298 406
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	1 864 381	1 807 564
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivatives exposures	4 443 857	4 105 970
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	13 414 182	22 620 145
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	225 468	224 481
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	Total securities financing transaction exposures	13 639 650	22 844 626
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	59 058 558	53 731 170
20	(Adjustments for conversion to credit equivalent amounts)	(35 848 171)	(31 895 462)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	(183 889)	(186 780)
22	Off-balance sheet exposures	23 026 498	21 648 928
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m	(Total exempted exposures)	-	-

EU LR2 - LRCom: Leverage ratio common disclosure (contd)

		CRR leverage ratio exposures	
		a	b
		31.12.2025	30.06.2025
Capital and total exposure measure			
23	Tier 1 capital	18 217 713	17 770 629
24	Total exposure measure	306 117 076	279 808 594
Leverage ratio			
25	Leverage ratio (%)	5.95%	6.35%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5.95%	6.35%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	5.95%	6.35%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b	of which: to be made up of CET1 capital	-	-
27	Leverage ratio buffer requirement (%)	-	-
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	46 828 945	41 926 160
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	13 414 182	22 620 145
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)	339 531 840	299 114 609
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)	339 531 840	299 114 609
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)	5.37%	5.94%
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)	5.37%	5.94%

EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

		31.12.2025
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	265 884 718
EU-2	Trading book exposures	4 550 449
EU-3	Banking book exposures, of which:	261 334 269
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	119 548 785
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	32 297
EU-7	Institutions	1 045 239
EU-8	Secured by mortgages of immovable properties	44 637 620
EU-9	Retail exposures	35 847 834
EU-10	Corporates	36 038 960
EU-11	Exposures in default	2 094 354
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	22 089 179

Description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers.

The below information addresses the scope of disclosure from table EU LRA.

		31.12.2025	30.09.2025*
Total Leverage Ratio exposure measure		306 117 076	285 241 160
Capital and regulatory adjustments			
Tier 1 capital		18 217 713	18 637 918
Include Regulatory adjustments - Tier 1		(2 149 807)	(1 791 852)
Leverage ratio			
Leverage Ratio on mBank Group		5.95%	6.53%

*key metrics template recalculated taking into account the retrospective including of profit for the third quarter of 2025

The decrease in the Group's mBank leverage ratio level in the fourth quarter of 2025 was driven by an increase in the total exposure measure of the leverage ratio resulting from the growth in assets, as well as a decline in the Group's Tier I capital due to higher Tier I capital deductions.

Description of the processes used to manage the risk of excessive leverage.

The leverage ratio is regularly monitored, forecast and compared to peer group. mBank Group has aspiration to keep leverage ratio at a level highly exceeding minimal requirements amounting to 3%, which are in force since 28 June 2021. The fixed strategic target is monitored and verified at least on a yearly basis. Capital Management Committee performs the essential role in management of risk of excessive leverage in mBank Group.

Bank counteracts risk of excessive leverage taking into account potential increase in mentioned risk caused by own funds drop associated with expected or incurred losses. Additionally, annual planning process includes forecast of year end leverage ratio as well as plan of the ratio in a four-year time horizon. The projection is updated depending on the macroeconomic environment. Moreover, mBank also examines capital adequacy in adverse macroeconomic scenarios (ICAAP stress tests), including risk scenarios chosen by the Bank's Management Board. The Bank maintains an internal capital buffer for the leverage ratio, above the level required by banking supervision, to address the potential impact of the materialisation of adverse scenarios.

7. Credit risk mitigation techniques

The information presented in this chapter fulfill the presentation requirements of EU CRC Qualitative disclosure requirements related to CRM techniques.

7.1 Collateral valuation and management

The policies and processes for on- and off-balance sheet netting

Financial assets and financial liabilities are offset and the net amount is reported in the statement of financial position when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

The main types of guarantor and credit derivative counterparty and their creditworthiness

As at 31 December 2025 mBank Group did not hold credit derivatives.

Retail

mBank mitigates the credit risk of the retail portfolio by requesting legal collaterals for granted loans. In the case of property-secured transactions, major components of the collateral policy include maximum admissible levels of LtV (Loan to Value – the ratio of loan amount to value of property used as collateral) and the rules of accepting collaterals.

Retail properties

When drafting the LtV policy for mortgage loans, mBank adheres to Recommendation S, which is a set of good practices in the field of mortgage-secured retail credit exposure risk management. In the case of commercial real properties, due to lower liquidity of the collateral, mBank takes on a more prudent approach in terms of admissible LtV values than the one that is required by the regulator.

Bank carries out a careful selection of real properties which may serve as collateral. Within the analysis of a credit application, a liquidity assessment of a local real property market and of the nature of a real property (typical, non-typical) is conducted – that is aimed at ensuring the assumed effectiveness of recovery from the collateral accepted. Prior to taking a credit decision, mBank in each case determines the value of the real property accepted as collateral. When the value verification in the retail sales process is based on an appraisal report, which is verified in terms of its assumptions and parameters by analysts, the determined value is confirmed by the analysis of similar real estate transaction prices from the internal real estate database and the AMRON interbank database, rental rates or information from available publications regarding the real estate market. For standard types of residential real estate, the Bank has introduced the possibility of verifying the value of real estate valuation for typical residential properties located on developed markets, based on the analysis of transaction prices of similar real estate originating from the mentioned above real estate database and the note from the inspection of real estate. Additionally, property value verification may be carried out using an Automated Valuation Model (AVM). The valuations generated by the AVM are subsequently subject to final review and approval by an analyst.

The value of residential properties is updated regularly by analysts - at least once every 3 years in the case for exposures where the current LtV ratio is smaller than 80% and not less frequently than once a year in the case. The value of commercial properties is updated annually. The value of the selected pool of contracts is updated individually by a Bank analyst. The value of other residential real estate portfolio is updated using the price change index.

Corporates

The credit risk taken by mBank when granting credit products to clients may be mitigated by collateral. The types of collateral accepted by mBank, rules for establishing collateral, principles of evaluating and verifying value of collaterals and concerning management of collaterals are set out in detailed internal instructions of mBank. mBank has a dedicated collateral policy in the area of corporate banking. The most important elements of this policy are:

- indication of collateral preferred and not recommended,
- recommendations regarding the requirements of collateral in specific situations,
- principles for verifying the value of and monitoring collateral,
- Bank's approach to collateral with MRV parameter equal to zero.

mBank's policy is based on the assumption that mBank's decision to grant a credit product entails an effort to obtain collateral of the highest quality and value adequate to the scale of risk taken. The collateral value should be correlated not only with the borrower's creditworthiness, but also with the amount of the product posing credit risk and the risk level arising from the specific qualities of the credit product. In the case of mortgage-secured loans, mBank uses level of LtV ratio in line with regulatory requirements. Under justified circumstances, mBank may refrain from asking for collateral. Moreover, in the case of personal collateral (e.g. surety, guarantee) the standing and reliability of the collateral provider is evaluated using the standards applicable to the assessment of borrowers. The value of fixed assets accepted as collateral

is determined on the basis of an appraisal report compiled by a licensed expert. The report is submitted to mBank and verified by a team of specialists located in the risk area who analyse it in terms of correctness of the assumed market value and assess the liquidity of the collateral from mBank's viewpoint. On a regular basis, mBank monitors the quality of collateral.

The monitoring covers in particular the effectiveness of the legal establishment of collateral, validity of insurance policies and paid insurance premium, completeness of collateral documentation, update of collateral value and adequacy of collateral value and present amount of exposure. The process of valuing and monitoring collateral is supported by an IT application called CRM 2.0. The system gathers information on:

- necessary data on collateral and its providers/owners,
- original valuation and its updates,
- participants and course of the process of collateral registration, valuation and monitoring.

In addition, mBank systematically supervises the control of credit risk monitoring in the scope of accepted collateral.

7.2 Main types of collateral

Retail

Mortgage on real property

Mortgage on a financed (or other) real property is a basic collateral for mortgage loans. mBank accepts only a first lien mortgage.

The „de minimis“ guarantee

The guarantee provided by Polish state bank Bank Gospodarstwa Krajowego (BGK) within the governmental aid program addressed to entrepreneurs, covering the working capital loans and investment loans. The guarantee might secure up to the 60 % of the loan amount and not more than PLN 5 million.

Corporates

When making a decision on granting funding to a client, mBank aims at obtaining collateral adequate to the risk taken. mBank prefers highly liquid property collateral or personal collateral provided by entities characterised by high PD-rating and having assets and financial strength acceptable by mBank.

The accepted collateral acts as credit risk mitigant, provided that it carries a specified real value at the time of potential enforcement and meets the qualitative requirements making it possible to recover the debt by way of enforcement. The quality of property collateral is evaluated in terms of liquidity and market value, while the quality of personal collateral is assessed in terms of the financial standing of the collateral provider. The most frequently used collateral types include:

- property collateral, i.e. mortgage, , registered pledge, transfer of ownership rights,
- financial collateral, i.e. assignment of rights to the creditor, financial pledge, security deposit or blockade of funds on bank account,
- personal collateral, i.e. guarantee (e.g. BGK guarantees de minimis), surety, aval.

The assessment of collateral includes the evaluation of the possibility to establish the collateral and assessment of legal state of the subject of collateral, in particular analysis of any encumbrances in favour of other creditors (verification of land and mortgage registers, entries in the pledge register, etc.). It is essential that the validity period of collateral is longer than the maturity period of the product backed by it, so that mBank has enough time to perform all the legal acts necessary to satisfy its claims.

Moreover, in Bank's internal regulations, mBank indicates a separate group of properties which are not recommended as collateral due to their specific qualities making it impossible for mBank to satisfy its claims due to quick loss of value by the property or difficulties with its disposal.

EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques, addressing disclosure requirements of art. 453 letter f) of CRR Regulation, presenting the carrying amount of exposures net of allowances /impairments divided into unsecured and secured exposures, including collateral categories:

	Unsecured carrying amount	Secured carrying amount				
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives	
	a	b	c	d	e	
1	Loans and advances	109 640 386	76 044 378	72 762 038	3 282 340	-
2	Debt securities	81 072 404	-	-	-	-
3	Total	190 712 790	76 044 378	72 762 038	3 282 340	-
4	<i>Of which non-performing exposures</i>	987 552	1 161 668	1 007 036	154 632	-
5	<i>Of which defaulted</i>	981 033	1 158 522			

The template above presents all the credit risk mitigation techniques used in compliance with the accounting standards, whether or not they are recognized on the basis of CRR, including all the types of collateral and financial guarantees regarding all the collateralized exposures, whether for the calculation of risk weighted assets standardized approach or IRB are used.

In 2025 there was no significant change in the use of credit risk mitigation techniques.

7.3 Market or credit risk concentration

Taking into account the reduction of the concentration risk arising from the exposure to a single currency (or indexed to a single currency), mBank monitors - on a monthly basis the currency structure of the portfolio.

mBank reduces exposures to a single entity/group of affiliated entities by setting a General Limit (approved by the appropriate decision-making body) for exposures to a customer/group of affiliated customers.

On a daily basis, mBank monitors exposures in terms of identification of large exposures and exceeding of concentration limit of exposures defined in line with CRR Regulation.

mBank maintains a list of entities for which there is a risk a default (Watch List and LEW) and analyses (on a monthly basis) concentration risk of exposures exposed to the default risk.

In order to control and reduce concentration risk arising from exposures to entities representing the same sector, mBank sets the limits for sectors in which mBank's exposure exceeds 5% of the total amount of exposures.

mBank controls risk arising from concentration of exposures to entities representing the same geographical region as well as individual countries by setting and monitoring country or regional limits.

In the Corporate and Investment Banking, mBank monitors the level of exposure of credit facilities secured by the same type of collateral.

On a quarterly basis, mBank analyses the mBank Group's credit portfolio in terms of concentration, taking into account the largest exposures to customers/groups of affiliated customers.

The Bank monitors large exposures that are subject to exposure limit i.e. exposures after taking into account the effect of the credit risk mitigation (in accordance with art. 401-403 of CRR Regulation) and exemptions (art. 390(6), art. 400, art. 493(3) of CRR Regulation), which are equal or exceed 10% of Tier I capital. As of the end of 2025, the Group recorded a large exposure to the State Treasury amounting to PLN 3 885 million, which represented 21.3% of the Group's Tier I capital. Additionally, in accordance with art. 4(1)(39) of the CRR Regulation, the Group applies an alternative approach to exposures to central governments, under which the central government is included in each group of connected clients that are directly controlled by or directly connected with the central government. As a result of applying this approach, the Group identified an additional 27 large exposures to groups of entities connected with the State Treasury. The largest exposure, after applying the indicated approach amounted to PLN 4 333 million, which represented 23.8% of the Group's Tier I capital. On 28 January 2025, the Bank received approval from the PFSA, issued pursuant to art. 500a(2) of the CRR Regulation, to increase the large exposure limit for groups of entities connected to the State Treasury to 39% of Tier I capital. The approval is applicable until the end of 2027.

As at 31 December 2025 there was no substantial level of geographical concentration in the credit portfolio of mBank Group. In terms of exposure relating to countries other than Poland there was no substantial share of exposure with value loss.

8. Exposures to credit risk

8.1 Overdue and impaired exposures – definitions used

The following qualitative description addresses the requirements of the EU CRB table – Additional disclosed information related to the credit quality of assets.

mBank applies a uniform default definition in all areas of the credit risk management, i.e. for the purpose of calculating expected credit losses and capital requirement. The default definition is based on the definition included in CRR Regulation.

The customer is reclassified to the default category in the case of loss event occurrence. Reclassification of at least one customer credit liability to the default category reclassifies all credit and non-credit liabilities of the customer to the default category.

Corporate portfolio - Impairment triggers

The list of definite loss events in corporate portfolio:

1. The number of days past due of the principal, interest or fees is over 90 days (in the case of exposures to Banks over 14 days). Number of days past due is calculated at the debtor level and commences when both absolute and relative materiality thresholds have been exceeded, where:
 - absolute threshold refers to the sum of all overdue amounts related to the debtor's liabilities towards the Bank and amounts to PLN 2 000 for corporate and investment banking debtors and PLN 400 for Private Banking debtors registered in corporate systems,
 - relative threshold refers to the ratio of all overdue amounts related to the debtor's liabilities towards the Bank to the sum of balance sheet exposures related to given debtor and amounts to 1%.

The adopted definition of overdue credit obligations and materiality thresholds are in line with the Regulation of the Minister of Finance, Investment and Development of October 3, 2019 on the materiality level of an overdue credit commitment.
2. mBank's sale of the credit obligation with material economic loss related to change in creditworthiness of the debtor.
3. mBank performed distressed restructuring (the materiality threshold from which the Bank considers a diminished financial obligation to be defaulted is 1%).
4. Information about enforcement proceedings instigated against a debtor in the amount which in the Bank's opinion is likely to result in a loss of creditworthiness.
5. Information about a petition for bankruptcy, liquidation of a debtor, dissolution or annulment of a company, or about appointment of a guardian.
6. Declaration of bankruptcy of a debtor or acquiring by him a similar legal protection resulting in his evasion of or delay in repayment of credit obligations towards mBank, the parent or subsidiary entity of mBank.
7. Information about dismissal of a petition for bankruptcy of a debtor on grounds that the assets of the debtor are insufficient or are only sufficient to cover the costs of bankruptcy proceedings.
8. Debtor's failure to repay the amount of surety provided by the Government.
9. Termination of part or whole credit agreement by mBank or the beginning of restructuring or collection procedures.
10. Fraud (embezzlement) of the debtor .
11. Bank expecting suffering a loss on the client.
12. Occurrence of cross default default.
13. Information on filing a restructuring petition or instigating a restructuring proceedings with regard to a debtor within the meaning of the Restructuring Law Act.
14. Information on major financial problems suffered by a debtor.

In addition, mBank identifies loss-events specific to individual categories of entities, and so-called 'soft' loss events, introduced in order to indicate situations, which may result in the loss of the debtor's ability to repay the loan to mBank. In such a case, an additional analysis is carried out taking into account the entity's branch specificity, and as a result, an individual decision is made regarding stage classification.

Retail portfolio - Impairment triggers

The list of definite loss events in retail portfolio:

1. the number of days past due of the principal, interest or fees is over 90 days. Number of days past due is calculated at the debtor level and commences when both absolute and relative materiality thresholds have been exceeded, where:
 - absolute threshold refers to the sum of all overdue amounts related to the debtor's liabilities towards the Bank and amounts to PLN 400 for Polish branch, CZK 2 500 for the foreign branch of the Bank in Czech Republic and EUR 100 for the foreign branch of the Bank in Slovakia,
 - relative threshold refers to the ratio of all overdue amounts related to the debtor's liabilities towards the Bank to the sum of balance sheet exposures related to given debtor and amounts to 1%.
2. The adopted definition of overdue credit obligations and materiality thresholds are in line with the Regulation of the Minister of Finance, Investment and Development of October 3, 2019 on the materiality level of an overdue credit commitment.
2. mBank performed distressed restructuring (the materiality threshold from which the Bank considers a diminished financial obligation to be defaulted is 1%).
3. Termination of the agreement by the Bank in the event of breach of the loan agreement by the debtor.
4. Obtaining information on the submission of a petition for consumer bankruptcy by the debtor, conducting court proceedings in this matter or a judgment by the court of consumer bankruptcy.
5. Obtaining information about the submission of an application by the debtor to initiate or to conduct bankruptcy / restructuring proceedings against the debtor, which, in the Bank's opinion, may result in delay or failure to repay the liability.
6. Recognition of the contract as fraudulent.
7. mBank's sale of the credit obligation with material economic loss related to change in creditworthiness of the debtor.
8. Uncollectable status of debt.
9. Payout of low down payment insurance
10. Occurrence of cross default.

Forborne definition

The definition of a restructured exposure used for the implementation of point (d) of Article 178(3) CRR specified by the EBA Guidelines on default in accordance with Article 178 CRR is consistent with the definition of forborne exposure defined in Annex V to Commission Implementing Regulation (EU) 2021/451.

8.2 Quantitative information

The following subscriptions address the requirements of the EU CRB table – Additional disclosed information related to the credit quality of assets.

How exposures are classified to stages

In accordance with IFRS mBank classifies credit exposures to following stages:

- Stage 1 – exposures for which the risk did not increase significantly since the initial recognition in the loan portfolio,
- Stage 2 – exposures for which, as at the reporting date, a significant deterioration in credit quality was identified compared to the date of their initial recognition,
- Stage 3 – exposures for which credit-impairment was found during its lifetime in portfolio,
- POCI (purchased or originated credit-impaired asset) – assets identified as credit-impaired at initial recognition.

In mBank the assignment of exposure to Stage 2 takes place according to the Transfer Logic algorithm, which defines the qualitative and quantitative criteria indicating a significant increase of credit risk, while the classification exposure to the Stage 3 is determined by loss-events mentioned earlier.

Once the quantitative or qualitative criteria that were used to classify the exposure in Stage 2 at the reporting date are no longer met (the client and the exposure assigned to him or her no longer meet any of the Transfer Logic qualitative criteria or quantitative criteria), the exposure will be moved from Stage 2 to Stage 1. In the case of exposures classified as forbearance, the additional condition for reclassification to Stage 2 is the 24 month probation period during which the loan has a performing status.

The exposure may also be transferred from Stage 3 to Stage 2 or to Stage 1 if for each loss-events assigned to debtor, probation period has elapsed and debtor's assessment, carried out after probation period, has not shown that the debtor is unlikely to fully repay its obligations without recourse to realizing security.

Probation period refers to the period in which debtor properly fulfills its obligations, calculated from the moment event leading to loss-event ceases.

Probation period is calculated separately for each loss-event. Probation period is also maintained when the exposure due to which loss-event has occurred has been repaid, written off or sold. Probation period equals:

- for distressed restructuring – 12 months,
- for other loss-events – 3 months.

During probation period, the Bank assesses debtor's credit behavior, and the exit from probation period depends on proper service.

Significant deterioration of credit quality (classification to stage 2)

A significant deterioration in credit quality is recognised for the asset concerned on the basis of quantitative and qualitative criteria, with the asset being transferred to Stage 2 once at least one of such qualitative or quantitative criteria is met.

Qualitative criteria are:

- the number of days of delay in paying the amount due is greater than or equal to 31 days, taking into account materiality thresholds:
 - the absolute threshold refers to the past due exposure amount and amounts to PLN 400 for retail exposures in Polish branch and exposures of Private Banking debtors, registered in corporate systems, CZK 2 500 for retail exposures in the foreign branch of the Bank in Czech Republic, EUR 100 for retail exposures in the foreign branch of the Bank in Slovakia and PLN 2 000 for exposures in the area of corporate and investment banking,
 - the relative threshold refers to the ratio of the past due exposure amount to the total balance sheet exposure amount and amounts to 1%,
- the number of days of delay in paying the amount due of exposure is greater than or equal to 91 days (without materiality thresholds),
- occurrence of the Forborne performing flag (the client status shows that he or she is experiencing difficulties in repaying the loan commitment, as defined by mBank),
- threefold PD backstop indicator - at least threefold increase of current PD level in relation to PD at initial recognition date.
- Occurrence of the Watch List flag (the Bank's internal process designed to identify corporate clients who are subject to increased monitoring in terms of changes in credit quality, in accordance with the Watch List classification rules adopted by mBank),
- deterioration of the risk profile of the entire exposure portfolio, due to the type of product, industry or distribution channel (for retail customers),
- classification within a group of exposures subject to a collective approach (a group of exposures with similar characteristics, for which there are expectations of future credit quality deterioration resulting from the analysis of factors affecting this group that are not reflected in risk parameters).

The Bank quantifies the level of credit risk in relation to all exposures or clients for which credit exposures exists. In the absence of available information to assess the credit risk of an exposure at initial recognition, the Bank classifies such an exposure to stage 2 without the possibility to reclassify it to stage 1.

The quantitative criterion of the Transfer Logic is based on a significant deterioration in credit quality, which is assessed on the basis of relative and absolute long-term change in Probability of Default (PD), specified for the exposure at the reporting date, relative to the long-term PD specified on initial recognition.

Low credit risk criteria

For exposures whose characteristics are indicative of low credit risks (LCR), expected credit losses are always determined on a 12-month basis. Exposures designated as LCR may not be transferred from Stage 1 to Stage 2, although they can be moved from Stage 1 to Stage 3 upon being recognized as credit-impaired. The Bank applies the LCR criterion to clients from the government and central bank segment with investment grade ratings and to clients from Local Government Units segment. The LCR criteria is not used in the retail banking segment.

Calculation of expected credit losses

Valuation expected credit losses (ECL) are measured at the level of a single contract or exposure (agreement). In the portfolio approach, expected credit losses are the multiplication of individual for each exposure estimated value of PD, LGD and EAD and the final value of expected credit losses is the sum of expected credit losses in particular periods discounted with the effective interest rate. If on the reporting

date the exposure credit risk did not increase significantly since the initial recognition, expected credit losses are calculated in the minimum horizon of 12-month horizon and horizon to maturity. If the exposure credit risk increased significantly since the initial recognition (exposure is in the stage 2), the Bank calculates expected credit losses in the life-time horizon (Lt ECL).

In the case of non-financial guarantees, the mBank Group applied an approach that the expected credit losses are always included in lifetime horizon (Lt ECL).

The individual approach concerns all balance sheet and off-balance sheet credit exposures with an impairment in the corporate loan portfolio and Private Banking loan portfolio, which is registered in corporate systems. The expected credit losses are calculated as a difference between the value of exposure and the present value of the estimated future cash flows discounted with the effective interest rate.

The method of calculating the expected recoveries takes place in scenarios and depends on the Bank's chosen strategy for the client. In case of restructuring strategy, considered scenarios assume a significant share of recoveries from the customer's own payments. In case of debt collection strategy, the scenarios are focused mainly on recoveries from collateral. The Bank identifies scenarios at exposure level, minimum 2 scenarios are considered obligatory, with additional condition that one of them reflects a partial loss on exposure. Weight of particular scenario results from an expert assessment of the likelihood of scenarios based on the relevant facts of the case, in particular on existing security and their type, client's financial situation, client's willingness to cooperate, the risks that may occur in the case and micro- and macroeconomic factors.

Use of macroeconomics scenarios in ECL estimation

mBank is required to set an expected credit loss in a way which meets the expectations for various forward-looking macroeconomic scenarios. In the case of portfolio estimation of ECL, the non-linearity factor (NLF) is set in order to adjust the value of an expected credit loss (calculated every month). The values of NLF are used as scaling factors for individual ECLs. The NLF factor is determined separately for retail and corporate segments at least once a year. NLFs are used as scaling factors for individual ECLs that are determined at the level of individual exposures in each segment. NLFs are calculated based on results from three simulation calculations at the same reporting date, which result from relevant macroeconomic scenarios. In particular, NLF for a given segment is calculated as the ratio of:

- the probability-weighted average of the expected loss from three macroeconomic scenarios ('average estimation') comprising: baseline scenario, optimistic scenario and pessimistic scenario. The weights of scenarios are consistent with probabilities of realization for each scenario – 60% for base, 20% for optimistic and 20% for pessimistic,
- divided by the expected loss determined under baseline scenario (reference estimate).

Simulation calculations, whose results are used to calculate NLF, are carried out on the basis of the same input data on exposure characteristics, but involve different risk parameter vectors, if the macroeconomic expectations defined in the scenarios are such as to affect the value of these parameters.

Additionally, the inclusion of forward-looking information takes place in the models of all three credit risk parameters estimated in the lifetime horizon (LtPD, LtEAD, LtLGD). In the estimates the Bank uses, among others, generally available macroeconomic and financial indicators (GDP, employment in the enterprise sector, unemployment rate, level of export and import, salaries, monetary financial institutions receivables from households), expectations regarding interest rates and exchange rates, as well as changes in property prices, separately for residential and commercial properties.

In the case of individual ECL estimation, each time, based on an expert assessment, the Bank estimates the impact of macroeconomic factors and other general factors (e.g. the Bank's previous cooperation with the borrower, the nature of the product) on the probability of the adopted scenarios in the calculation of the estimated loss and on the assumed amounts and dates of inflow from operating cash flows and from collateral. This is done through a comprehensive expert assessment of above factors. Macroeconomic factors used in individual ECL estimation are based on assumptions for budget forecasts and financial plans used for management and reporting at mBank. Future economic conditions may not be taken into account in the process of estimating ECL if Bank does not identify connection between macroeconomic factors and the level of expected loss.

Fair Value for credit assets

If the conditions for the measurement of a credit asset at amortized cost (IFRS 9, point 4.1.2) are not met, then it is measured at Fair Value through Profit & Loss or at Fair Value through Other Comprehensive Income.

Fair value valuation of non-impaired credit assets

The valuation for non-impaired exposure is based on its discounted estimated future cash flows.

Future cash flows are determined taking into account:

- repayment schedule, and in the absence of a schedule (revolving products) - based on a statistical estimation of the annual credit limit utilization in expected behavioral exposure period,
- time value of money, based on risk-free interest rates set in the process of forecasting interest flows,
- cash flows amount and their schedule fluctuations stemming from the option of prepayment (early partial or full repayment of the principal) included in the loan agreement by application of prepayment factors,
- uncertainty of cash flows resulting from credit risk throughout the forecasted lifetime of the exposure by modification of contract flows using multi-year credit risk parameters Lt PD and Lt LGD,
- other factors that would be taken into consideration by the potential exposure buyer (overhead costs and the profit margin expected by market participants) during the process of calibration of the discount rate used in the valuation process.

Due to requirements of IFRS 13 for the exposures for which there are no quotes on an active market, the Bank calibrates the discount rate based on fair value at the date of the initial recognition (i.e. the cost price of exposure). Calibration margin reflects market valuation of costs related to maintaining exposures in the portfolio and market expectations about profit margin realized on similar exposures.

Fair value valuation of impaired financial assets

Impaired Financial assets are valued based on expected recoveries. In case of retail financial assets the valuation reflected by LGD parameters, and in the case of corporate exposures it refers to individual recovery scenarios.

EU CR1-A: Maturity of exposures, addressing disclosure requirements of art. 442 letter g) of CRR Regulation.

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	40 697 432	40 138 699	45 385 835	72 262 275	-	198 484 241
2	Debt securities	-	36 490 679	44 955 894	3 098 712	12 229	84 557 514
3	Total	40 697 432	76 629 378	90 341 729	75 360 987	12 229	283 041 755

Non-performing and forborne exposures

In accordance with the EBA/GL/2018/06 guidelines, banks are obliged to monitor and manage the NPL portfolio. Banks should strive to maintain the value of the NPL portfolio below the threshold set by the regulator at 5%. The NPL ratio for mBank Group calculated in accordance with the Guidelines EBA/GL/2018/06 remains at level below the threshold and as of December 31, 2025 was equal to 3.09%. In comparison to December 31, 2024, the ratio is lower by 0.6 p.p. The decrease of the indicator is related to both business lines and results from stable portfolio development and efficient management of debt collection.

EU CR1: Performing and non-performing exposures and related provisions, addressing disclosure requirements of art. 442 letter c) and e) of CRR Regulation.

	a	b	c	d	e	f
	Gross carrying amount/nominal amount					
	Performing exposures			Non-Performing exposures		
		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	39 282 593	39 281 884	709	-	-
010	Loans and advances	145 365 225	120 417 404	24 483 819	4 631 587	6
020	Central banks	11 812 403	11 812 403	-	-	-
030	General governments	31 395	13 295	17 961	1	1
040	Credit institutions	1 388 551	1 379 529	9 022	-	-
050	Other financial corporations	3 833 079	3 770 748	54 970	16 608	13 756
060	Non-financial corporations	54 095 089	40 268 970	13 749 879	2 395 732	2 199 194
070	Of which: SMEs	37 376 474	30 157 864	7 158 361	1 659 430	1 462 893
080	Households	74 204 708	63 172 459	10 651 987	2 219 246	1 862 636
090	Debt Securities	81 094 142	80 737 701	326 538	39 367	-
100	Central banks	15 058 093	15 058 093	-	-	-
110	General governments	54 538 004	54 538 004	-	-	-
120	Credit institutions	9 165 804	9 165 804	-	-	-
130	Other financial corporations	1 126 551	1 075 766	38 557	39 367	39 367
140	Non-financial corporations	1 205 690	900 034	287 981	-	-
150	Off-balance sheet exposures	51 929 199	44 438 599	7 485 082	143 756	-
160	Central banks	-	-	-	-	-
170	General governments	20 787	20 138	649	-	-
180	Credit institutions	4 671 231	4 644 698	26 533	-	-
190	Other financial corporations	2 493 752	2 415 130	78 622	365	334
200	Non-financial corporations	34 560 693	27 870 854	6 684 976	112 943	106 280
210	Households	10 182 736	9 487 779	694 302	30 448	29 100
220	Total	317 671 159	284 875 588	32 296 148	4 814 710	6

EU CR1: Performing and non-performing exposures and related provisions (contd):

	g	h	i	j	k	l	m	n	o	
	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals and financial guarantees received		
	Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures	
		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	(9 115)	(9 114)	(1)	-	-	-	-	-	
010	Loans and advances	(1 096 639)	(415 817)	(678 818)	(2 488 885)	-	(2 388 792)	-	74 882 711	1 161 668
020	Central banks	-	-	-	-	-	-	-	-	-
030	General governments	(671)	(86)	(585)	-	-	-	-	2 233	-
040	Credit institutions	(1 138)	(397)	(741)	-	-	-	-	593	-
050	Other financial corporations	(21 052)	(15 964)	(5 048)	(10 065)	-	(8 826)	-	264 136	870
060	Non-financial corporations	(423 670)	(218 219)	(211 987)	(1 374 418)	-	(1 402 771)	-	29 736 164	661 169
070	Of which: SMEs	(339 485)	(185 816)	(151 901)	(875 133)	-	(903 486)	-	21 421 792	476 008
080	Households	(650 108)	(181 151)	(460 457)	(1 104 402)	-	(977 195)	-	44 879 585	499 629
090	Debt Securities	(28 256)	(25 001)	(3 255)	(32 849)	-	(32 849)	-	-	-
100	Central banks	(4 761)	(4 761)	-	-	-	-	-	-	-
110	General governments	(16 801)	(16 801)	-	-	-	-	-	-	-
120	Credit institutions	(1 667)	(1 667)	-	-	-	-	-	-	-
130	Other financial corporations	(891)	(719)	(172)	(32 849)	-	(32 849)	-	-	-
140	Non-financial corporations	(4 136)	(1 053)	(3 083)	-	-	-	-	-	-
150	Off-balance sheet exposures	133 867	65 411	72 473	48 542	-	50 011	-	8 275 092	55 799
160	Central banks	-	-	-	-	-	-	-	-	-
170	General governments	95	19	76	-	-	-	-	-	-
180	Credit institutions	144	108	36	-	-	-	-	29 967	-
190	Other financial corporations	3 800	2 583	1 217	71	-	85	-	292 350	-
200	Non-financial corporations	85 794	46 747	43 862	41 228	-	43 190	-	7 697 673	55 520
210	Households	44 034	15 954	27 282	7 243	-	6 737	-	255 102	279
220	Total	(1 258 762)	(506 229)	(754 546)	(2 570 276)	-	(2 471 652)	-	83 157 803	1 217 467

EU CQ5: Credit quality of loans and advances to non-financial corporations by industry, addressing disclosure requirements of art. 442 letter c) and e) of CRR Regulation.

		a	b	c	d	e	f
		Gross carrying amount			of which: loans and advances subject to	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		of which: non-performing					
				of which: defaulted			
010	Agriculture, forestry and fishing	422 004	13 865	13 865	421 817	(14 527)	(133)
020	Mining and quarrying	175 961	4 857	4 857	175 917	(6 206)	-
030	Manufacturing	10 968 956	753 529	753 529	10 963 698	(529 306)	(699)
040	Electricity, gas, steam and air conditioning supply	3 351 258	30 279	30 279	3 351 258	(68 112)	-
050	Water supply	704 248	5 040	5 040	704 247	(11 336)	-
060	Construction	6 426 644	316 268	316 268	6 421 198	(156 017)	(1 241)
070	Wholesale and retail trade	11 530 050	515 545	515 545	11 518 956	(412 748)	(1 289)
080	Transport and storage	3 184 269	180 018	180 018	3 180 487	(126 173)	(394)
090	Accommodation and food service activities	925 897	41 507	41 507	924 150	(24 113)	(159)
100	Information and communication	2 733 170	50 310	50 310	2 731 070	(60 719)	(164)
110	Real estate activities	6 338 221	262 004	262 004	6 313 959	(147 641)	(2 574)
120	Financial and insurance activities	82 721	249	249	82 721	(721)	-
130	Professional, scientific and technical activities	4 117 616	83 029	83 029	4 114 130	(77 526)	(109)
140	Administrative and support service activities	2 070 332	64 665	64 665	2 067 997	(56 463)	(80)
150	Public administration and defense, compulsory social security	2 939	529	529	2 939	(501)	-
160	Education	320 246	5 291	5 291	319 570	(5 936)	-
170	Human health services and social work activities	1 877 728	20 138	20 138	1 876 899	(33 290)	-
180	Arts, entertainment and recreation	527 304	33 772	33 772	527 082	(20 602)	-
190	Other services	731 259	14 837	14 837	731 077	(39 292)	(16)
200	Total	56 490 823	2 395 732	2 395 732	56 429 172	(1 791 229)	(6 858)

EU CQ4: Quality of non-performing exposures by geography, addressing disclosure requirements of art. 442 letter c) and e) of CRR Regulation.

	a	b	c	d	e	f	g
	Gross carrying/Nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantee given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which: non-performing		of which: defaulted	of which: subject to impairment			
010	On balance sheet exposures	270 412 912	4 670 954	4 627 971	269 980 648	(3 626 488)	(29 256)
020	Poland	220 404 945	4 395 072	4 352 089	219 914 832	(3 456 961)	(29 212)
030	Czechia	21 551 746	150 004	150 004	21 551 741	(86 464)	-
040	Luxembourg	19 688 753	6	6	19 759 619	(118 052)	-
050	Slovakia	5 602 019	120 526	120 526	5 601 999	(2 563)	-
060	France	1 097 799	-	-	1 097 776	(349)	-
070	United States	675 502	462	462	663 191	(268)	-
080	Belgium	399 379	-	-	399 306	(1 031)	-
090	Germany	392 084	545	545	392 084	(53)	-
100	Netherlands	210 731	86	86	210 599	(203)	-
110	United Kingdom	192 795	531	531	192 786	(620)	-
120	Cyprus	74 048	-	-	74 031	(376)	-
130	Switzerland	29 273	57	57	29 150	(54)	-
140	Turkey	21 165	-	-	21 165	(43)	-
150	Ireland	15 238	26	26	15 180	(34)	-
160	Malta	9 156	950	950	9 143	(292)	-
170	United Arab Emirates	5 577	1 629	1 629	5 574	(26)	-
180	Slovenia	5 278	-	-	5 271	(55)	-
190	Spain	4 756	129	129	4 751	(85)	-
200	Sweden	4 536	118	118	4 433	(726)	(44)
210	Jordan	4 145	-	-	4 142	(20)	-
220	Norway	3 400	43	43	3 400	(33)	-
230	Denmark	3 213	150	150	3 185	(63)	-
240	Portugal	2 702	-	-	2 702	-	-
250	Iceland	2 115	-	-	2 114	-	-
260	Saudi Arabia	2 109	-	-	2 109	(9)	-
270	Canada	2 093	32	32	2 085	(41)	-
280	Malaysia	926	-	-	925	(9)	-
290	New Zealand	879	-	-	879	(1)	-
300	Italy	810	133	133	810	(11)	-
310	Australia	798	137	137	798	(1)	-
320	Austria	791	20	20	791	-	-
330	Ukraine	603	36	36	597	(39)	-
340	Israel	566	-	-	566	-	-
350	Colombia	500	-	-	500	(91)	-
360	Finland	500	-	-	500	(2)	-
370	Egypt	370	166	166	370	-	-
380	Thailand	342	86	86	342	(21)	-
390	Hungary	272	-	-	272	-	-
400	Lithuania	197	8	8	169	(3)	-
410	Dominican Republic	166	-	-	166	(78)	-
420	Singapore	162	-	-	162	-	-
430	Tanzania, United Republic of	114	-	-	114	(78)	-
440	Japan	68	-	-	68	1	-
450	South Africa	63	-	-	63	(9)	-
460	Monaco	60	-	-	35	-	-
470	Estonia	60	-	-	60	-	-
480	Virgin Islands, British	24	-	-	24	-	-
490	Curaçao	23	-	-	23	-	-
500	Greece	18	-	-	18	-	-
510	Romania	14	1	1	-	-	-
520	Gibraltar	14	-	-	14	-	-
530	Bulgaria	5	-	-	5	-	-
540	Latvia	4	-	-	4	-	-
550	Croatia	3	-	-	3	-	-
560	Mexico	1	1	1	1	(1)	-
570	Russian Federation	-	-	-	-	42 276	-
580	Other Countries	2	-	-	1	-	-

EU CQ4: Quality of non-performing exposures by geography (contd):

	a	b		c	d	e	f	g
		Gross carrying/Nominal amount		of which: non-performing	of which: defaulted	of which: subject to impairment	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantee given
590	Off balance sheet exposures	52 072 956	143 756	143 587	-	-	182 406	-
600	Poland	45 344 515	143 304	143 135			179 727	
610	Germany	3 261 560	2	2			186	
620	United Kingdom	1 266 079	-	-			105	
630	Czechia	580 007	314	314			1 297	
640	France	474 299	-	-			3	
650	Slovakia	219 829	111	111			442	
660	Austria	178 287	-	-			283	
670	Luxembourg	165 625	-	-			134	
680	Spain	128 739	-	-			10	
690	Denmark	121 002	-	-			4	
700	United States	113 108	2	2			22	
710	Ireland	103 024	-	-			4	
720	Japan	32 244	-	-			1	
730	Netherlands	25 516	-	-			7	
740	Switzerland	13 874	1	1			10	
750	Canada	9 355	-	-			14	
760	Egypt	4 703	-	-			14	
770	Qatar	3 975	-	-			-	
780	Italy	3 493	-	-			-	
790	Israel	2 900	-	-			-	
800	India	2 899	-	-			3	
810	Jordan	2 549	-	-			3	
820	Korea, Republic of	2 200	-	-			-	
830	Cyprus	1 802	-	-			39	
840	Malta	1 385	-	-			66	
850	Singapore	1 380	-	-			-	
860	Portugal	1 034	-	-			3	
870	South Africa	1 032	-	-			1	
880	Hungary	830	-	-			-	
890	Sweden	766	-	-			6	
900	United Arab Emirates	673	2	2			3	
910	Norway	597	-	-			2	
920	Belgium	493	-	-			1	
930	Turkey	485	-	-			-	
940	Australia	476	20	20			3	
950	Croatia	271	-	-			-	
960	Hong Kong	200	-	-			-	
970	Virgin Islands, British	190	-	-			2	
980	Lithuania	189	-	-			10	
990	Finland	169	-	-			1	
1000	Andorra	150	-	-			-	
1010	New Zealand	119	-	-			-	
1020	Gibraltar	95	-	-			-	
1030	Curaçao	86	-	-			-	
1040	Iceland	80	-	-			-	
1050	Thailand	68	-	-			-	
1060	Chile	58	-	-			-	
1070	Russian Federation	55	-	-			-	
1080	China	54	-	-			-	
1090	Argentina	50	-	-			-	
1100	Bahamas (the)	50	-	-			-	
1110	Slovenia	49	-	-			-	
1120	Tanzania, United Republic of	47	-	-			-	
1130	Colombia	43	-	-			-	
1140	Monaco	37	-	-			-	
1150	Cayman Islands	35	-	-			-	
1160	Greece	27	-	-			-	
1170	Bulgaria	20	-	-			-	
1180	Philippines	20	-	-			-	
1190	Guernsey	18	-	-			-	
1200	Estonia	10	-	-			-	
1210	Mexico	10	-	-			-	
1220	Malaysia	7	-	-			-	
1230	Latvia	5	-	-			-	
1240	Saudi Arabia	5	-	-			-	
1250	Moldova (the Republic of)	4	-	-			-	
1260	Total	322 485 868	4 814 710	4 771 558	230 698 055	(3 617 373)	182 406	(29 256)

EU CQ1: Credit quality of forborne exposures, addressing disclosure requirements of art. 442 letter c) of CRR Regulation.

		a	b	c	d	e		f	g	h
		Gross carrying amount/ Nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals 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	-	-	-	-	-	-	-	-	-
010	Loans and advances	1 140 700	1 636 639	1 636 054	1 618 898	(32 441)	(699 854)	1 323 244	453 918	
020	Central banks	-	-	-	-	-	-	-	-	
030	General governments	-	-	-	-	-	-	-	-	
040	Credit institutions	-	-	-	-	-	-	-	-	
050	Other financial corporations	906	5 622	5 622	5 622	(58)	(1 974)	844	641	
060	Non-financial corporations	561 846	979 585	979 585	962 104	(12 313)	(474 995)	733 887	254 088	
070	Households	577 948	651 432	650 847	651 172	(20 070)	(222 885)	588 513	199 189	
080	Debt Securities	-	-	-	-	-	-	-	-	
090	Loan commitments given	160 654	20 571	20 571	17 047	1 836	7 592	72 063	13 965	
100	Total	1 301 354	1 657 210	1 656 625	1 635 945	(34 277)	(707 446)	1 395 307	467 883	

Template EU CQ3: Credit quality of performing and non-performing exposures by past due days

		a	b	c	d	e	f	g	h	i	j	k	l	
		Gross carrying amount/nominal amount												
		Performing exposures			Non-performing exposures									
			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	Of which defaulted	
005	Cash balances at central banks and other demand deposits	39 282 593	39 282 593	-	-	-	-	-	-	-	-	-	-	
010	Loans and advances	145 365 225	140 147 282	5 217 943	4 631 587	2 297 862	382 975	548 317	596 527	549 008	132 961	123 938	4 627 971	
020	Central banks	11 812 403	11 812 403	-	-	-	-	-	-	-	-	-	-	
030	General governments	31 395	31 395	-	1	-	-	-	-	-	-	-	1	
040	Credit institutions	1 388 551	1 388 551	-	-	-	-	-	-	-	-	-	-	
050	Other financial corporations	3 833 079	3 823 680	9 400	16 608	9 993	843	1 967	1 178	256	344	2 028	16 608	
060	Non-financial corporations	54 095 089	49 110 992	4 984 097	2 395 732	1 252 883	180 093	227 550	344 149	290 179	80 846	20 033	2 395 732	
070	Of which SMEs	37 376 474	35 432 540	1 943 934	1 659 430	844 720	117 779	176 247	197 744	256 529	49 511	16 902	1 659 430	
080	Households	74 204 708	73 980 261	224 446	2 219 246	1 034 986	202 039	318 800	251 200	258 573	51 771	101 877	2 215 630	
090	Debt securities	81 094 142	81 094 142	-	39 367	39 367	-	-	-	-	-	-	-	
100	Central banks	15 058 093	15 058 093	-	-	-	-	-	-	-	-	-	-	
110	General governments	54 538 004	54 538 004	-	-	-	-	-	-	-	-	-	-	
120	Credit institutions	9 165 804	9 165 804	-	-	-	-	-	-	-	-	-	-	
130	Other financial corporations	1 126 551	1 126 551	-	39 367	39 367	-	-	-	-	-	-	-	
140	Non-financial corporations	1 205 690	1 205 690	-	-	-	-	-	-	-	-	-	-	
150	Off-balance-sheet exposures	51 929 199			143 756								143 587	
160	Central banks	-			-								-	
170	General governments	20 787			-								-	
180	Credit institutions	4 671 231			-								-	
190	Other financial corporations	2 493 752			365								365	
200	Non-financial corporations	34 560 693			112 943								112 774	
210	Households	10 182 736			30 448								30 448	
220	Total	317 671 159	260 524 017	5 217 943	4 814 710	2 337 229	382 975	548 317	596 527	549 008	132 961	123 938	4 771 558	

Changes in the stock of non-performing exposures

EU CR2: Changes in the stock of non-performing loans and advances, addressing disclosure requirements of art. 442 letter f) of CRR Regulation.

		a
		Gross carrying amount
010	Initial stock of non-performing loans and advances	5 011 720
020	Inflows to non-performing portfolios	2 805 724
030	Outflows from non-performing portfolios	(3 185 858)
040	Outflows due to write-offs	(755 962)
050	Outflow due to other situations	(2 429 896)
060	Final stock of non-performing loans and advances	4 631 586

The ratio changes of non-performing loans and advances were described on page 67 under the table EU CR1-A: Maturity of exposures.

Information on collateral obtained by taking possession and execution processes

Information on collateral obtained by taking possession and execution processes as at 31 December 2025 is presented below.

EU CQ7: Collateral obtained by taking possession and execution processes, addressing disclosure requirements of art. 442 letter c) of CRR Regulation.

		a	b
		Collateral obtained by taking possession accumulated	
		Value at initial recognition	Accumulated negative changes
010	Property Plant and Equipment (PP&E)	-	-
020	Other than Property Plant and Equipment	141 206	(47 257)
030	Residential immovable property	-	-
040	Commercial immovable property	54 796	(26 994)
050	Movable property (auto, shipping, etc.)	86 410	(20 263)
060	Equity and debt instruments	-	-
070	Other	-	-
080	Total	141 206	(47 257)

Information on exposures to entities of the shadow banking system

This disclosure fulfils the requirement of Article 449b of the CRR.

As of 31 December 2025, the total amount of exposures to entities of the shadow banking system within the mBank S.A. Group amounted to PLN 2 441 697 thousand.

Quantitative information in accordance with Attachment 1 to Recommendation R

Data is presented for the portfolio measured at amortized cost and fair value through other comprehensive income. The presented PD scale reflects the assessment at the time of initial recognition. Exposures that do not have a rating from the moment of initial recognition have been classified in the range 0.00% to <0.15%. Due to the use of the individual method for the impaired corporate portfolio, the average LGD parameter for portfolios in Stage 3 and POCI has been presented with a limitation to portfolios for which the individual method is not applicable. Average maturity is presented in the same way as in EU CR6.

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Institutions									
Stage 1	0.00 to <0.15%	443 617	4 118 306	1 764 707	0.02	611	38.21	3.94	89
	0.15% to <0.25%	208 266	207 236	272 432	0.12	47	38.00	2.81	4
	0.25% to <0.50%	251 293	196 339	305 412	0.22	43	38.01	1.73	143
	0.50% to <0.75%	128 883	12 964	133 953	0.33	15	38.45	1.75	153
	0.75% to <2.50%	36 660	99 192	68 134	0.37	31	38.78	3.27	95
	2.50% to <10.00%	503	169	611	2.49	5	15.15	2.56	3
	10.00% to <45.00%	-	-	-	-	-	-	-	-
	45.00% to <100.00%	194	-	194	47.34	7	6.85	2.17	6
Stage 2	0.00 to <0.15%	8 638	22 865	16 099	9.84	88	38.72	3.51	671
	0.15% to <0.25%	-	339	339	-	1	114.37	-	-
	0.25% to <0.50%	23	100	56	7.72	3	38.83	2.31	2
	0.50% to <0.75%	-	-	-	-	-	-	-	-
	0.75% to <2.50%	0.01	-	0.01	18.37	2	40.00	5.00	0.001
	2.50% to <10.00%	157	355	390	45.18	9	29.63	1.94	51
	10.00% to <45.00%	1 135	-	1 135	23.25	6	40.00	5.00	109
	45.00% to <100.00%	232	1	233	47.34	4	8.95	2.83	14
POCI non-default	-	-	-	-	-	-	-	-	

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Institutions					
Stage 3	to 12 months	-	-	-	-
	from 13 to 24 months	-	-	-	-
	from 25 to 36 months	-	-	-	-
	from 37 to 48 months	-	-	-	-
	from 49 to 60 months	-	-	-	-
	from 61 to 84 months	-	-	-	-
	above 84 months	-	-	-	-
POCI	to 12 months	-	-	-	-
	from 13 to 24 months	-	-	-	-
	from 25 to 36 months	-	-	-	-
	from 37 to 48 months	-	-	-	-
	from 49 to 60 months	-	-	-	-
	from 61 to 84 months	-	-	-	-
	above 84 months	-	-	-	-

mBank S.A. Group

Disclosures regarding capital adequacy as at 31 December 2025

(PLN thousand)

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Exposures to governments and central banks portfolio									
Stage 1	0.00 to <0.15%	98 086 665	-	98 022 251	0.11	142	25.64	2.20	4 304
	0.15% to <0.25%	310 140	-	310 071	0.17	1	25.00	2.15	-
	0.25% to <0.50%	-	-	-	-	-	-	-	-
	0.50% to <0.75%	-	-	-	-	-	-	-	-
	0.75% to <2.50%	-	-	-	-	-	-	-	-
	2.50% to <10.00%	-	-	-	-	-	-	-	-
	10.00% to <45.00%	-	-	-	-	-	-	-	-
	45.00% to <100.00%	-	-	-	-	-	-	-	-
Stage 2	0.00 to <0.15%	0.59	40	26.12	2.68	2	40.00	3.04	0.47
	0.15% to <0.25%	-	-	-	-	-	-	-	-
	0.25% to <0.50%	-	-	-	-	-	-	-	-
	0.50% to <0.75%	-	-	-	-	-	-	-	-
	0.75% to <2.50%	-	-	-	-	-	-	-	-
	2.50% to <10.00%	-	-	-	-	-	-	-	-
	10.00% to <45.00%	-	-	-	-	-	-	-	-
	45.00% to <100.00%	-	-	-	-	-	-	-	-
POCI non-default	-	-	-	-	-	-	-	-	-

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Exposures to governments and central banks portfolio					
Stage 3	to 12 months	-	-	-	-
	from 13 to 24 months	-	-	-	-
	from 25 to 36 months	-	-	-	-
	from 37 to 48 months	-	-	-	-
	from 49 to 60 months	-	-	-	-
	from 61 to 84 months	-	-	-	-
	above 84 months	-	-	-	-
POCI	to 12 months	-	-	-	-
	from 13 to 24 months	-	-	-	-
	from 25 to 36 months	-	-	-	-
	from 37 to 48 months	-	-	-	-
	from 49 to 60 months	-	-	-	-
	from 61 to 84 months	-	-	-	-
	above 84 months	-	-	-	-

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Retail non-mortgage portfolio (microfirms)									
Stage 1	0.00 to <0.15%	74 016	92 535	110 889	0.41	2 804	24.35	-	198
	0.15% to <0.25%	139 772	187 657	219 055	0.72	5 362	33.35	-	760
	0.25% to <0.50%	606 935	438 603	809 716	0.76	15 476	27.51	-	2 550
	0.50% to <0.75%	902 542	516 919	1 148 818	0.83	17 042	28.21	-	3 742
	0.75% to <2.50%	4 363 941	2 006 605	5 422 581	1.40	81 038	38.20	-	34 692
	2.50% to <10.00%	3 437 304	368 901	3 675 452	2.66	49 612	26.52	-	37 590
	10.00% to <45.00%	430 967	10 382	439 502	3.79	3 955	10.17	-	3 833
	45.00% to <100.00%	1 532	182	1 691	9.19	27	54.47	-	52
Stage 2	0.00 to <0.15%	117 698	17 141	127 156	1.48	2 206	13.02	-	1 825
	0.15% to <0.25%	99 889	10 962	106 842	3.01	1 816	22.46	-	4 451
	0.25% to <0.50%	254 725	31 393	275 445	4.30	4 890	27.45	-	14 887
	0.50% to <0.75%	294 349	37 724	322 720	4.46	5 857	26.25	-	16 019
	0.75% to <2.50%	987 645	133 614	1 090 637	8.00	21 329	39.11	-	98 586
	2.50% to <10.00%	698 012	63 398	756 325	14.30	15 662	26.29	-	69 732
	10.00% to <45.00%	145 826	13 978	159 631	15.88	1 935	10.36	-	6 355
	45.00% to <100.00%	7 417	246	7 584	15.66	189	57.32	-	1 208
POCI non-default		22 402	358	23 865	14.90	229	55.31	-	2 126

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Retail non-mortgage portfolio (microfirms)					
Stage 3	to 12 months	409 112	6 547	42.31	240 388
	from 13 to 24 months	191 160	2 938	38.11	141 152
	from 25 to 36 months	98 013	1 732	45.48	84 729
	from 37 to 48 months	42 376	899	40.87	39 651
	from 49 to 60 months	17 120	306	41.60	15 540
	from 61 to 84 months	23 648	441	35.86	23 021
	above 84 months	7 714	234	16.21	7 641
POCI	to 12 months	80 317	537	33.85	25 199
	from 13 to 24 months	49 568	333	49.36	22 084
	from 25 to 36 months	8 740	76	46.32	4 003
	from 37 to 48 months	1 679	15	59.56	1 071
	from 49 to 60 months	409	10	47.25	97
	from 61 to 84 months	153	4	22.94	0.10
	above 84 months	55	1	14.51	-

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Retail non-mortgage portfolio (natural persons)									
Stage 1	0.00 to <0.15%	490 548	329 062	687 096	0.12	48 306	40.28	-	326
	0.15% to <0.25%	515 238	139 676	600 367	0.26	35 470	44.47	-	702
	0.25% to <0.50%	771 633	151 216	864 833	0.49	49 981	42.91	-	1 748
	0.50% to <0.75%	952 418	64 701	990 287	0.79	57 410	45.49	-	3 394
	0.75% to <2.50%	7 591 675	90 096	7 645 222	1.61	412 272	51.96	-	61 700
	2.50% to <10.00%	2 563 570	11 600	2 570 531	3.50	164 407	53.23	-	45 798
	10.00% to <45.00%	44 958	361	45 186	8.97	3 536	51.50	-	2 010
	45.00% to <100.00%	923	6	927	18.24	35	54.11	-	89
Stage 2	0.00 to <0.15%	206 718	16 991	217 108	1.73	8 280	41.57	-	4 485
	0.15% to <0.25%	296 848	11 689	304 752	2.26	10 718	42.67	-	7 850
	0.25% to <0.50%	462 566	14 300	472 687	3.07	19 603	42.28	-	14 982
	0.50% to <0.75%	220 064	6 155	224 337	5.12	12 449	45.28	-	10 862
	0.75% to <2.50%	745 924	5 857	750 254	8.96	58 286	51.15	-	64 908
	2.50% to <10.00%	293 226	254	293 108	18.21	66 433	51.23	-	41 265
	10.00% to <45.00%	9 929	7	9 902	25.68	2 757	49.79	-	1 752
	45.00% to <100.00%	19 522	88	19 574	10.88	1 153	53.60	-	1 936
POCI non-default	35 440	30	44 040	15.60	1 007	54.69	-	2 325	

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Retail non-mortgage portfolio (natural persons)					
Stage 3	to 12 months	351 277	21 403	52.35	187 116
	from 13 to 24 months	108 228	5 191	58.74	63 360
	from 25 to 36 months	56 089	2 101	68.11	38 207
	from 37 to 48 months	24 819	858	67.66	16 935
	from 49 to 60 months	9 155	369	71.17	6 621
	from 61 to 84 months	4 691	252	85.25	4 056
	above 84 months	12 688	604	98.75	12 562
POCI	to 12 months	117 780	1 842	30.19	31 628
	from 13 to 24 months	58 702	782	48.87	24 709
	from 25 to 36 months	6 146	94	44.67	2 583
	from 37 to 48 months	1 124	28	46.78	345
	from 49 to 60 months	1 961	45	33.09	113
	from 61 to 84 months	465	9	54.98	41
	above 84 months	90	1	14.90	-

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Retail revolving loans portfolio									
Stage 1	0.00 to <0.15%	118 129	652 479	352 414	0.36	54 052	39.16	-	473
	0.15% to <0.25%	143 460	654 123	390 775	0.43	48 593	40.96	-	661
	0.25% to <0.50%	282 567	1 191 978	811 526	0.52	86 939	42.66	-	1 695
	0.50% to <0.75%	196 557	624 334	492 132	0.68	50 515	43.56	-	1 374
	0.75% to <2.50%	627 104	993 391	1 140 075	1.34	120 536	43.15	-	6 183
	2.50% to <10.00%	320 414	226 975	435 755	3.15	48 657	43.24	-	5 669
	10.00% to <45.00%	14 093	10 581	18 763	4.09	3 312	42.54	-	309
	45.00% to <100.00%	189	114	235	4.88	34	41.81	-	5
Stage 2	0.00 to <0.15%	69 922	113 253	120 256	2.79	12 416	43.33	-	5 425
	0.15% to <0.25%	74 908	57 462	103 322	4.40	7 295	46.18	-	7 366
	0.25% to <0.50%	161 269	82 643	206 161	5.44	13 268	47.60	-	17 572
	0.50% to <0.75%	140 720	56 780	174 015	5.86	11 005	47.65	-	15 387
	0.75% to <2.50%	417 410	83 746	472 449	8.63	32 678	46.51	-	52 140
	2.50% to <10.00%	179 985	20 305	194 053	14.16	15 060	45.78	-	27 887
	10.00% to <45.00%	7 746	843	8 191	19.13	929	44.61	-	1 398
	45.00% to <100.00%	1 650	1 373	2 237	6.06	302	42.67	-	158
POCI non-default		1 366	315	1 402	7.54	109	49.42	-	525

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Retail revolving loans portfolio					
Stage 3	to 12 months	113 866	6 575	56.03	63 846
	from 13 to 24 months	40 458	2 081	64.59	26 194
	from 25 to 36 months	16 108	660	62.96	10 227
	from 37 to 48 months	7 509	298	56.19	4 276
	from 49 to 60 months	2 332	109	47.24	1 141
	from 61 to 84 months	1 760	79	35.03	647
	above 84 months	595	34	33.23	209
POCI	to 12 months	50	3	30.98	20
	from 13 to 24 months	42	3	48.93	19
	from 25 to 36 months	103	5	54.22	52
	from 37 to 48 months	294	3	98.12	237
	from 49 to 60 months	-	-	-	-
	from 61 to 84 months	87	4	18.94	1
	above 84 months	-	-	-	-

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Retail mortgage portfolio (microfirms)									
Stage 1	0.00 to <0.15%	11 588	1 848	12 145	0.91	37	14.41	-	15
	0.15% to <0.25%	70 691	15 235	75 281	1.21	229	15.69	-	140
	0.25% to <0.50%	215 585	28 083	223 855	1.26	646	16.36	-	439
	0.50% to <0.75%	169 311	25 100	176 743	1.32	438	17.09	-	453
	0.75% to <2.50%	495 241	67 894	519 506	1.37	1 087	21.83	-	1 525
	2.50% to <10.00%	96 897	8 239	99 232	2.35	248	23.46	-	543
	10.00% to <45.00%	4 080	300	4 171	1.89	11	18.19	-	14
	45.00% to <100.00%	181	67	201	1.60	1	23.69	-	1
Stage 2	0.00 to <0.15%	18 905	3 143	19 781	2.73	54	17.65	-	336
	0.15% to <0.25%	45 481	3 953	46 677	2.81	115	16.72	-	788
	0.25% to <0.50%	82 681	9 084	85 418	6.69	233	15.70	-	2 441
	0.50% to <0.75%	57 855	5 686	59 538	4.56	165	16.91	-	1 617
	0.75% to <2.50%	135 389	13 800	139 309	5.43	360	18.90	-	4 965
	2.50% to <10.00%	25 709	2 221	26 436	6,00	90	19.13	-	867
	10.00% to <45.00%	4 065	-	4 066	6.49	10	16.81	-	137
	45.00% to <100.00%	1 778	311	1 871	6.44	4	20.33	-	43
POCI non-default	1 393	-	1 982	33.29	7	14.70	-	50	

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Retail mortgage portfolio (microfirms)					
Stage 3	to 12 months	53 981	92	18.92	10 523
	from 13 to 24 months	40 420	69	29.02	11 706
	from 25 to 36 months	20 254	48	23.07	4 663
	from 37 to 48 months	19 066	38	37.13	7 091
	from 49 to 60 months	13 749	26	39.84	5 437
	from 61 to 84 months	9 666	18	62.06	5 795
	above 84 months	14 224	22	94.46	12 665
POCI	to 12 months	6 179	4	27.16	1 231
	from 13 to 24 months	480	1	15.24	51
	from 25 to 36 months	5 939	2	18.70	226
	from 37 to 48 months	253	1	30.88	44
	from 49 to 60 months	3 620	3	37.53	3
	from 61 to 84 months	1 754	2	84.16	871
	above 84 months	3 782	7	93.74	2 013

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Retail mortgage portfolio (natural persons)									
Stage 1	0.00 to <0.15%	28 258 378	962 608	28 738 641	0.10	85 557	14.99	-	4 006
	0.15% to <0.25%	8 153 994	218 594	8 267 828	0.16	25 043	15.15	-	1 963
	0.25% to <0.50%	5 718 498	160 201	5 806 367	0.31	18 191	14.64	-	2 531
	0.50% to <0.75%	1 488 746	29 037	1 502 518	0.51	5 140	14.24	-	1 088
	0.75% to <2.50%	1 212 983	17 265	1 217 176	0.72	4 645	15.41	-	1 398
	2.50% to <10.00%	237 063	2 980	237 277	1.80	753	18.82	-	830
	10.00% to <45.00%	23 505	972	23 600	3.32	139	17.57	-	150
	45.00% to <100.00%	1 956	291	2 151	20.20	12	9.75	-	32
Stage 2	0.00 to <0.15%	4 080 101	17 398	4 037 356	1.57	11 717	15.25	-	30 430
	0.15% to <0.25%	1 025 899	3 852	1 017 418	2.93	2 952	14.46	-	11 743
	0.25% to <0.50%	729 759	4 273	725 285	4.79	2 260	13.80	-	10 714
	0.50% to <0.75%	205 899	370	204 441	7.59	648	13.75	-	4 269
	0.75% to <2.50%	194 365	830	193 466	10.33	781	13.74	-	4 990
	2.50% to <10.00%	19 881	61	19 809	17.04	123	12.46	-	723
	10.00% to <45.00%	5 047	16	5 061	14.18	39	12.79	-	174
	45.00% to <100.00%	15 683	619	16 008	2.15	97	20.05	-	163
POCI non-default	23 942	1	28 346	10.30	145	15.90	-	881	

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Retail mortgage portfolio (natural persons)					
Stage 3	to 12 months	203 153	596	19.21	41 912
	from 13 to 24 months	77 195	309	22.19	17 153
	from 25 to 36 months	51 389	193	31.07	15 924
	from 37 to 48 months	54 132	195	34.79	18 825
	from 49 to 60 months	16 496	112	51.08	8 365
	from 61 to 84 months	31 315	141	80.43	25 087
	above 84 months	63 406	194	99.53	59 938
POCI	to 12 months	4 275	24	16.66	386
	from 13 to 24 months	2 461	12	15.31	323
	from 25 to 36 months	3 776	10	40.90	1 364
	from 37 to 48 months	5 971	17	45.08	1 800
	from 49 to 60 months	10 052	10	66.03	4 768
	from 61 to 84 months	1 059	7	27.68	93
	above 84 months	8 705	23	95.60	4 888

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Corporations - specialized lending exposures									
Stage 1	0.00 to <0.15%	7 396 030	1 352 459	7 763 121	2.41	457	32.98	5.68	58 457
	0.15% to <0.25%	-	265	136	4.43	3	45.10	3,00	3
	0.25% to <0.50%	245 526	108 905	279 334	0.83	21	35.68	2.81	799
	0.50% to <0.75%	711 901	126 810	746 853	0.64	40	32.32	4.34	1 231
	0.75% to <2.50%	2 905 149	1 958 529	3 427 729	2.66	289	34.47	5.12	29 316
	2.50% to <10.00%	2 625 843	1 734 758	3 066 870	4.41	373	34.27	5.11	47 870
	10.00% to <45.00%	393 323	98 296	424 387	6.44	35	34.43	4.71	10 038
	45.00% to <100.00%	1	-	1	4.33	3	28.51	3.33	0.02
Stage 2	0.00 to <0.15%	519 193	10 304	520 875	4.99	51	32.56	4.94	21 041
	0.15% to <0.25%	2 687	4 400	4 431	1.73	3	22.97	1.34	22
	0.25% to <0.50%	-	953	784	4.43	2	26.10	2.21	30
	0.50% to <0.75%	-	-	-	-	-	-	-	-
	0.75% to <2.50%	80 462	52 118	94 210	4.00	19	22.61	3.76	6 734
	2.50% to <10.00%	402 483	33 567	446 562	5.08	36	26.54	3.24	16 422
	10.00% to <45.00%	4 897	-	4 897	5.60	2	17.79	0.41	88
	45.00% to <100.00%	-	-	-	-	-	-	-	-
POCI non-default	15 366	-	17 762	0.67	1	27.60	1.20	-	

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Corporations - specialized lending exposures					
Stage 3	to 12 months	132 165	16	-	81 840
	from 13 to 24 months	122 965	5	-	112 093
	from 25 to 36 months	172 620	14	-	93 449
	from 37 to 48 months	26 290	1	-	14 869
	from 49 to 60 months	-	-	-	-
	from 61 to 84 months	100	1	-	100
	above 84 months	1 200	2	-	1 200
POCI	to 12 months	142 684	1	-	19 757
	from 13 to 24 months	-	-	-	-
	from 25 to 36 months	-	-	-	-
	from 37 to 48 months	-	-	-	-
	from 49 to 60 months	-	-	-	-
	from 61 to 84 months	-	-	-	-
	above 84 months	42 276	1	-	0.0004

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Corporations - medium and small enterprises									
Stage 1	0.00 to <0.15%	194 322	484 068	513 984	0.09	870	28.12	2.24	128
	0.15% to <0.25%	142 219	333 713	328 855	0.19	499	26.60	2.59	180
	0.25% to <0.50%	208 845	686 481	603 383	0.40	973	26.34	2.06	671
	0.50% to <0.75%	319 951	628 607	676 915	0.66	953	25.87	2.09	1 023
	0.75% to <2.50%	2 715 086	2 550 301	4 237 108	1.45	4 067	25.18	2.33	14 508
	2.50% to <10.00%	1 320 433	1 037 546	1 870 631	3.03	1 734	23.38	1.77	12 054
	10.00% to <45.00%	34 010	59 201	74 970	8.00	139	23.96	2.55	1 198
	45.00% to <100.00%	55 547	59 084	80 937	1.67	152	20.15	3.70	271
Stage 2	0.00 to <0.15%	180 561	273 807	360 503	2.20	1 185	21.80	2.00	2 267
	0.15% to <0.25%	110 025	180 109	245 926	1.67	302	26.17	3.44	1 829
	0.25% to <0.50%	182 211	336 644	429 689	2.77	447	26.00	2.92	4 164
	0.50% to <0.75%	340 091	227 723	478 237	2.59	348	23.64	3.03	3 722
	0.75% to <2.50%	1 213 983	681 894	1 570 269	4.01	1 485	20.28	2.48	15 508
	2.50% to <10.00%	944 109	384 723	1 167 181	5.64	1 025	20.21	1.99	14 485
	10.00% to <45.00%	131 107	43 153	158 526	15.23	192	16.74	2.81	4 484
	45.00% to <100.00%	59	5 258	2 411	33.70	46	27.84	1.81	285
POCI non-default	67	-	309	3.42	1	2.30	1.08	-	

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Corporations - medium and small enterprises					
Stage 3	to 12 months	360 234	367	-	204 049
	from 13 to 24 months	128 076	234	-	86 990
	from 25 to 36 months	47 350	78	-	42 395
	from 37 to 48 months	34 291	19	-	17 658
	from 49 to 60 months	2 041	14	-	1 539
	from 61 to 84 months	13 664	50	-	12 132
	above 84 months	-	-	-	-
POCI	to 12 months	10 024	13	-	5 665
	from 13 to 24 months	42 874	15	-	23 642
	from 25 to 36 months	7 639	5	-	4 622
	from 37 to 48 months	4 531	4	-	1 747
	from 49 to 60 months	413	3	-	219
	from 61 to 84 months	1 112	2	-	363
	above 84 months	-	-	-	-

	PD scale	On-balance sheet exposures	Off-balance-sheet exposures	EAD (basis of ECL calculation)	EAD weighted average PD (%)	Number of exposures	EAD weighted average LGD (%)	EAD weighted average maturity (years)	Expected credit loss (ECL)
		a	b	c	d	e	f	g	h
Corporations - other									
Stage 1	0.00 to <0.15%	963 722	1 572 219	1 792 394	0.41	2 877	25.83	2.29	2 975
	0.15% to <0.25%	1 314 823	1 702 447	2 028 587	0.32	1 372	27.34	1.86	1 878
	0.25% to <0.50%	2 690 901	4 076 497	4 314 995	0.43	3 167	30.65	2.33	5 603
	0.50% to <0.75%	1 898 027	1 642 514	2 751 619	0.53	2 853	28.00	2.29	3 825
	0.75% to <2.50%	6 326 448	4 857 721	8 659 008	0.99	10 857	26.26	2.22	21 029
	2.50% to <10.00%	2 587 194	1 945 432	3 911 025	2.22	5 588	24.66	2.00	20 974
	10.00% to <45.00%	440 381	76 349	473 486	4.16	812	20.99	3.80	3 816
	45.00% to <100.00%	24 868	25 217	36 987	4.49	338	34.36	2.27	721
Stage 2	0.00 to <0.15%	378 526	481 294	627 132	1.80	4 266	23.40	2.27	4 917
	0.15% to <0.25%	187 879	313 937	358 107	1.16	944	20.38	1.93	1 431
	0.25% to <0.50%	1 756 177	925 265	2 106 922	1.08	2 439	22.05	2.59	10 133
	0.50% to <0.75%	736 694	384 184	919 125	2.54	2 112	21.36	2.12	5 916
	0.75% to <2.50%	3 199 402	1 370 182	4 024 774	2.42	6 209	19.47	2.85	34 427
	2.50% to <10.00%	1 450 431	726 466	1 882 633	6.29	3 596	18.70	2.18	25 281
	10.00% to <45.00%	86 298	20 015	100 571	16.61	382	16.97	3.26	3 837
	45.00% to <100.00%	40 166	7 813	44 755	8.23	217	23.33	4.58	1 777
POCI non-default		22 317	4 815	29 319	1.05	3	23.63	2.30	-

	Time in default	EAD (basis of ECL calculation)	Number of exposures	EAD weighted average LGD (%)	Expected credit loss (ECL)
		a	b	c	d
Corporations - other					
Stage 3	to 12 months	360 326	733	-	164 014
	from 13 to 24 months	191 074	963	-	130 605
	from 25 to 36 months	63 821	357	-	48 529
	from 37 to 48 months	25 582	118	-	21 126
	from 49 to 60 months	43 154	59	-	23 597
	from 61 to 84 months	50 615	74	-	37 772
	above 84 months	24 894	41	-	20 503
POCI	to 12 months	5 974	1	-	1 651
	from 13 to 24 months	430	3	-	129
	from 25 to 36 months	1 484	5	-	752
	from 37 to 48 months	647	4	-	412
	from 49 to 60 months	2 140	1	-	-
	from 61 to 84 months	-	-	-	-
	above 84 months	810	1	-	662

9. Operational risk

Operational risk is understood as the possibility of a loss resulting from inadequate or failed internal processes, people and systems or from external events, including also legal risk. It is comprehensive in nature, and can be caused by both factors in the Bank's environment and the Bank itself. External and internal factors affecting operational risk, due to their dynamic nature, are subject to constant analysis and evaluation.

Operational risk management is performed in mBank and, at the consolidated level, in mBank Group. While organizing the operational risk management process, the Bank takes into account regulatory requirements, which are the starting point for preparation of framework for the operational risk control and management system in the Bank and the mBank Group.

The aim of operational risk management in the Bank is to reduce the causes of operational events, the probability of their occurrence and the severity of potential consequences. mBank focuses its activities on an effective management process in each line of defense. An important factor for mBank Group is to deepen the awareness of operational risk and build an organizational culture that allows to develop appropriate risk mitigating mechanisms.

Due to the dynamics of changes in the factors influencing operational risk, the key elements of the risk management process are: identification, control and monitoring, counteracting the materialization of operational risks and reporting risks.

In order to effectively manage operational risk, the bank uses methods and quantitative and qualitative tools that aim at cause-oriented management of this risk. The bank carries them out in conjunction with the control function, which is part of the internal control system.

The basic tools for operational risk management are: Operational Loss Register, Self-Assessment of Operational Risk, Operational Risk Scenarios, Key Risk Indicators, assessment of operational risk of products before the implementation of a new or modified product offer and analysis of the impact of the outsourcing agreement on the operational risk profile.

mBank Group conducts activities to protect mBank and its subsidiaries against the effects of operational risk materialization. To do this:

- a proactive operational risk control and management system for all significant business areas and at every level of the organizational hierarchy has been established,
- methods and tools for managing and controlling operational risk in organizational units of mBank and mBank Group subsidiaries are actively used,
- methods and tools for controlling and managing operational risk are coordinated across mBank Group.

The organization of the operational risk control and management system is designed to enable effective control and management of this risk at all levels of the Bank's organizational structure. The structure of operational risk control and management includes, in particular, the role of the Supervisory Board and its Committees, the Management Board of the Bank, the Risk Committees, the Vice President of Risk Management, the Non-Financial Risk Management Department, and the tasks of operational risk managers in individual organizational units and business areas of the bank within all lines of defense.

The central operational risk control function focuses on preparing and coordinating the Bank's operational risk control and management process, developing tools, raising awareness in the Bank about operational risk and the control function, and reporting the operational risk profile. Operational risk management, on the other hand, is carried out in each of the Bank's organizational units and Group subsidiaries. It involves identifying, assessing and monitoring operational risk and taking measures to avoid, reduce or transfer it.

Operating in a number of significant business areas, throughout the country as well as outside of Poland through foreign branches, as part of a broad and diversified product offering aimed at a very broad spectrum of customers, naturally makes mBank vulnerable to operational risks that can come from a wide variety of sources. The Bank has an Operational Risk Management Strategy that defines its operational risk appetite. This risk appetite is continuously monitored and periodically reported to the Management Board, the Risk Committee of the Supervisory Board, and the Supervisory Board.

The Bank maintains an appropriate structure of documents governing the operational risk management process, including the strategy, policies, and procedures for identifying, assessing, monitoring, and mitigating risk, as well as the operational risk reporting framework. The operational risk management system ensures effective monitoring of risk exposure and supports decision-making aimed at its mitigation.

In 2025, as part of operational risk management, the mBank Group faced in particular losses related to legal risk associated with the portfolio of foreign currency loans.

In the classification of operating losses by business line segregated in accordance with the CRR Regulation, the vast majority of the mBank Group's operating losses are in retail banking business line (99%).

The table below presents the distribution of gross losses* incurred in 2025 by the mBank Group, broken down by event categories within the event type:

Operational risk categories	Total gross losses (in PLN thousands)
	2025-12-31
Internal frauds	-
Unauthorized activities	-
Theft and internal fraud	-
External frauds	26 774
Theft and external fraud	26 766
Systems security	9
Employment practices and workplace safety	374
Employee relations	374
Workplace environment safety	-
Discrimination and workplace diversity	-
Clients, products and business practices excluding foreign currency loans	34 838
Suitability, disclosure & fiduciary	18 996
Improper business or market practices, excluding foreign currency loans	15 813
Product defects	20
Client classification and exposures	-
Consulting services	9
Clients, products and business practices for foreign currency loans (CHF)	2 039 726
Improper business or market practices for foreign currency loans (CHF)	2 039 726
Damages to physical assets	6
Disasters and other events	6
Business disruption and system failures	6 698
Systems	6 698
Execution, Delivery and Process Management	7 935
Transaction capture, execution & maintenance	5 689
Monitoring and reporting	2 165
Customer intake and documentation	3
Customer account management	3
Non-client counterparties (e.g. clearing houses)	-
Vendors and suppliers	74
Total	2 116 352

* gross losses are calculated in accordance with Articles 317 and 318 of the CRR Regulation. The amount of losses does not include operational risk event losses related to credit risk, which are included in the risk-weighted exposure amounts for credit risk.

The level of operational risk losses is monitored on an ongoing basis and reported regularly to the Bank's Management Board, the Bank's Supervisory Board and the Business and Risk Forum Committees. When operational loss thresholds are exceeded, there are monitoring and escalation mechanisms in the mBank Group. They ensure that operational events are analyzed appropriately and trigger corrective actions.

10. Liquidity risk

The below information addresses the scope of disclosure from table EU LIQA.

Liquidity risk is understood as the risk of losing the ability to fund assets and timely execute payments arising from mBank Group's balance sheet and off-balance sheet items on terms and conditions convenient for mBank Group and at a market price.

The purpose of liquidity risk management is to ensure and maintain mBank Group's ability to meet both current and future obligations. mBank Group accomplishes this goal by diversifying stable sources of funding in relation to customer groups (from which it obtains deposits), products and currencies, maintaining the liquidity buffer, while optimizing the balance sheet in terms of profitability. mBank Group's long-term activities in this area are implemented taking into account the conditions as to the possibility of obtaining funding and profitability of the business. To this end, mBank Group is preparing a funding strategy, which is an element of long-term liquidity management. It is to provide, among others effective diversification of sources and funding period. The strategy is based on business plans, describes the main sources of funding and factors affecting mBank Group's ability to obtain appropriate funding.

In 2025, the European Central Bank continued the cycle of interest rate reductions initiated in 2024. Following eight consecutive rate cuts, the deposit facility reference rate declined from 4.5% in September 2023 to 2.15% in December 2025.

In the same year, after a prolonged period of maintaining interest rates at an unchanged level, the National Bank of Poland (NBP) also implemented six interest rate cuts. As a result, the NBP reference rate decreased from 6% in September 2023 to 4% in December 2025. The reduction in policy rates led to a gradual decrease in the interest rates offered on term deposits by banks.

In 2025, the mBank Group operated in an uncertain geopolitical and market environment. Despite unpredictable market conditions, the mBank Group demonstrated high resilience to liquidity risk. The increase in the deposit base and the low growth rate of credit activity directly contributed to strengthening the liquidity position. In 2025, the three largest rating agencies raised their creditworthiness assessments for mBank, assigning a stable outlook.

The mBank Group maintained high liquidity due to the high share of retail deposits in the Bank's balance sheet, a large portfolio of liquid assets, and low concentration of liabilities. The high level of guaranteed deposits also was important.

As part of the EMTN program, mBank carried out two issuances in 2025: a EUR 400 million Tier II subordinated bond issue and a EUR 500 million green senior non-preferred (NPS) bond issue. Both transactions further strengthened the Group's liquidity position.

As part of the conclusions drawn from the analysis of market events, in 2025 mBank Group introduced new early warning indicators in the area of liquidity, aimed at monitoring the concentration of wholesale funding maturities and the concentration of liquid assets.

Despite such volatile market conditions, mBank's liquidity measures throughout the reporting period were well above minimum regulatory levels and internal levels that determine risk appetite.

Risk management organization

The organization of liquidity risk management in mBank Group has a hierarchical structure. mBank's Supervisory Board approves and supervises the implementation of the Liquidity Risk Management Strategy adopted by the Bank's Management Board.

mBank Group established the liquidity adequacy assessment process (ILAAP), the purpose of which is to define the framework of the liquidity risk management process ensuring the maintenance of a sufficient level of liquidity in relation to the established risk appetite, allowing for the survival of defined stress conditions in a defined time horizon.

Strategic liquidity risk management is the responsibility of the Bank's Management Board, which delegates part of its responsibilities to appropriate committees, i.e. the Capital, Asset and Liability Committee and the Financial Market Risk Committee.

The roles and tasks in the area of liquidity risk management were organized according to the three defense lines model. The following units participate in this process:

- **Treasury Department** - first line of defense, provides funds for settlements on the bank's accounts, maintains certain values of risk parameters and measures within the granted liquidity limits, maintains a portfolio of securities as a buffer in the event of a stress situation materializing, ensures long-term funding in the form of issuance of debt securities and provides funding for companies from the mBank Group,
- **Financial Resources Management Department** - first line of defense is responsible for operational management of long term liquidity,

- **Financial Markets Settlement and Services Department** – first line of defense, is responsible for the operational supervision of the correctness of cash flows on the bank's accounts and performs functions in the settlement of securities transactions,
- **Balance Risk Management Department** - second line of defense, is responsible for control and ongoing monitoring of the Bank's liquidity risk level. Monitors the level of financial liquidity on a daily basis,
- **Internal Audit Department** – third line of defense, makes independent assessments of first and second line of defense,
- **Validation Unit** – in the scope of models validation for liquidity risk use.

Centralization level of liquidity risk management

mBank is the parent company in mBank Group. Therefore, as part of consolidated supervision and liquidity risk management at the mBank Group level, the Bank's Management Board sets the rules for intra-group funding and sets liquidity limits for individual entities of the mBank Group. Nevertheless, the management boards of individual subsidiaries are responsible for managing liquidity risk in their companies. They are responsible for complying with intra-group limits accepted by them and commit to adhering to the principles of placing liquidity surpluses as established within the mBank Group.

Measuring, limiting and reporting liquidity risk

mBank has a process of cyclical reporting of liquidity risk. It includes both the delivery of a standard daily management information package for entities dealing with liquidity risk management and persons controlling the liquidity risk management process at the operational level and for the purposes of making strategic decisions regarding liquidity risk.

The following measures are reported daily:

- regulatory measures LCR and NSFR,
- level of liquidity gap for mBank, mBank Group and subsidiaries significant from the point of view of liquidity risk along with the use of limits imposed on them in:
 - base scenario within one year and above one year time horizons,
 - stress scenarios,
- SLRR (Stress Liquidity Reserve Requirement), i.e. the requirement of a stress reserve calculated as the difference between the base scenario and the minimum of the stress scenarios and SLRP (Stress Liquidity Reserve Portfolio) - a portfolio of liquid assets with funding positions that serve as a buffer for the survival of defined stress conditions. The value of the SLRP should exceed the SLRR over a survival horizon of 1 month,
- intraday liquidity,
- other internal measures of liquidity risk.

The following measures are reported weekly:

- early warning indicators, consisting of indicators monitoring the level of use of regulatory and internal limits, indicators monitoring significant changes in market factors, changes in the balance sheet structure (including concentrations) and volume changes, as well as the stability of the deposit base), as well as market perception of the Bank brand (selected early warning indicators are monitored on a daily basis),
- recovery indicators.

The following measures are reported monthly:

- regulatory and internal liquidity measures for members of the Bank's Management Board,
- regulatory and internal liquidity measures for the Financial Markets Risk Committee,
- regulatory measures, internal liquidity measures and forecasts of liquidity measures including business development forecasts for the Capital, Assets and Liabilities Management Committee.

Regulatory measures and internal liquidity measures are reported on a quarterly basis to the Bank's Supervisory Board.

The basic measure reflecting mBank Group's liquidity position is the mismatch gap resulting from the future cash flows, taking into account behavioral modeling for selected items. It includes all assets, liabilities and off-balance sheet items of mBank Group for all currencies within set time horizons.

For the purposes of ongoing liquidity monitoring, mBank Group calculates the values of the actual, cumulative cash flow mismatch gap. The adjusted gap is calculated on the basis of contractual flows.

Primarily, the subject to adjustment are the cash flows resulting from the portfolio of deposits of non-banking customers, the portfolio of overdraft facilities and cash flows of the portfolio of term loans. When calculating liquidity measures, mBank Group takes into account the potential possibilities of obtaining funds from liquidation or pledging of securities comprising the Liquidity Reserves.

Stress tests

Stress testing is a key component of the ILAAP. The mBank Group applies it on an ongoing basis in liquidity risk management. Stress tests make it possible to assess the Group's resilience to adverse external and internal events with different levels of probability.

The mBank Group conducts liquidity risk stress tests that encompass stress scenarios related to the Bank, the entire market, as well as combinations of these factors, across both short-term and long-term horizons. Tests are carried out on each reporting day. The results are included in the daily report sent to persons involved in the liquidity risk management process, as well as to bodies and committees operating in mBank Group.

Stress test results inform the Bank's Management Board and management about the impact of adverse and unexpected conditions associated with various types of risk on mBank Group's liquidity position, and also indicate the balancing capacity necessary to limit the adverse effects of stress scenarios.

The following stress tests are conducted annually:

- an integrated stress test, taking into account the impact of materialization of other types of risk on the liquidity risk,
- an in-depth long-term liquidity analysis, covering the scenario of credit risk materialization,
- following scenario analyses included in the mBank Group Recovery Plan :
 - a scenario analysis assuming an internal crisis, based on the case study of Credit Suisse,
 - a systemic scenario with a geopolitical nature,
 - a combined scenario,
- analysis of liquidity needs in two scenarios - an internal crisis and a market-wide crisis, for the purposes of the resolution process.

As a complement to the set of liquidity stress tests, a reverse stress test is conducted annually. Its purpose is to identify the most significant risk factors whose materialisation could threaten the viability of the mBank Group's business model, and to support the determination of the liquidity risk appetite as well as the severity of liquidity stress test scenarios.

In addition, a stress scenario for intraday liquidity risk is calculated on a monthly basis.

On a monthly basis, mBank Group also performs stress scenarios based on forecast liquidity risk measures. The first scenario assumes the inability to execute the planned issuances of debt securities, while the second scenario additionally assumes extreme conditions in the foreign exchange and interest rate markets, resulting in outflows to cover collateral deposits for derivative transactions, a decrease in the valuation of the securities portfolio, and outflows of deposits held by large depositors.

At least once a year, an LCR sensitivity analysis and a cumulative gap sensitivity analysis over a 1-month horizon are also conducted. Sensitivity analyses are a key tool for assessing the sensitivity of liquidity measures to changes in selected risk factors and help in designing and verifying the credibility of stress test scenarios.

The mBank Group uses stress test results, including:

- for defining liquidity risk appetite,
- for establishing the structure and size of limits that determine liquidity risk tolerance,
- for determining the set and size of possible funding sources in extreme liquidity conditions for the Contingency Plan in case of a threat of loss of financial liquidity by the mBank Group and the mBank Group Recovery Plan,
- for establishing the required structure and level of stress liquidity reserves in the event of stress conditions.

As part of the ILAAP process, the materiality of individual liquidity risk factors is assessed annually at the Group level based on a quantitative criterion. Currently, the material risk factors for mBank Group's are:

- volatility of deposit base, taking into account the division into major business,
- increase in potential drawing of unused off-balance sheet commitments,
- sensitivity to changes in the valuation of the liquid securities portfolio,
- increased demand for intraday liquidity,
- sensitivity to changes in the valuation of derivative transactions resulting in the need to top up collateral,
- increased liquidity needs of the Banks' subsidiaries,
- early repayment of loans,
- increased mandatory reserve requirement,
- losses from materialization of other risk types,
- risk of non-renewal of wholesale financing.

Depending on the obtained materiality assessment, the mBank Group considers a given liquidity risk factor within the appropriate process (measurement, stress tests, risk appetite setting, sensitivity analysis, financial planning).

Additionally, once a year the mBank Group assesses the materiality of environmental, social, and governance (ESG) risk factors, identifying the transmission channels through which ESG risks may affect liquidity risk.

ESG risk factors are incorporated into the ILAAP stress-testing framework primarily through their indirect impact on other risk categories. Although ESG risks are not modelled as standalone stress-test scenarios, they are integrated into ILAAP via their influence on credit, market, operational and reputational risks.

Furthermore, the Bank incorporates ESG transition risks into its annual funding planning process and ensures structural liquidity resilience by maintaining the capacity to issue green bonds on European financial markets. These activities reflect mBank's commitment to aligning its liquidity risk management with regulatory expectations regarding ESG and with market standards.

Contingency plan

mBank Group has a Liquidity Contingency Plan, which defines the strategy and procedure to be followed in the case of liquidity shortages in the event of a liquidity threat by mBank Group.

The provisions of the Contingency Plan specify the division of tasks between mBank's organizational units, in the scope of:

- ongoing assessment of mBank and mBank Group liquidity,
- analysis and identification of the risk of an emergency situation related to the threat of liquidity loss,
- the procedure to be followed in a situation when this risk materializes.

Description of the emergency procedure includes:

- general rules of conduct in case various emergency scenarios materialize, including:
 - scope of duties and responsibilities,
 - authorization to make a decision regarding the initiation and termination of emergency procedure,
 - determining the time needed to start actions,
 - decision-making paths,
- outline - when and how to act in the event of an emergency,
- identifying a set of alternative funding sources potentially available in an emergency,
- clarifying the rules for the internal exchange of information on mBank Group's current liquidity situation during emergency proceedings,
- developing communication rules with external entities and internal stakeholders to limit reputational risk.

In addition, tests of the Contingency Plan for mBank Group are conducted and based on their results changes are made to the provisions of the Plan. The results of the Contingency Plan test are reported and analyzed at the level of the Financial Markets Risk Committee and the Bank's Management Board. In 2025, as part of Contingency Plan testing, the Bank tested the ability to obtain secured funding from the Eurosystem through mBank's branch in Slovakia. This included transactions under the intraday credit facility as well as the Marginal Lending Facility with the National Bank of Slovakia.

Other information and quantitative data

The liquidity risk management strategy is implemented through active shaping of the balance sheet structure and cash flows, as well as maintaining liquidity reserves adequate to the needs of the mBank Group, the balance sheet structure, obligations to subsidiaries, market conditions, and the liquidity demand identified in stress testing.

The mBank Group conducts its operations in Poland, the Czech Republic and Slovakia. In both foreign locations, mBank is a direct participant in the respective local payment and settlement systems and holds the necessary master agreements enabling participation in open market operations carried out by the local central banks. This framework provides the mBank Group with access to instruments for placing liquidity surpluses as well as obtaining liquidity in line with the monetary policy mechanisms of the respective central banks, including operations conducted by the National Bank of Slovakia on behalf of the European Central Bank.

mBank keeps a surplus of liquid and unencumbered assets constituting the Liquidity Reserves, for which there is a possibility of pledging, transaction on repo market or selling at any time without significant loss in value. Liquidity reserves were composed mainly of the Polish government debt securities in PLN and EUR, bills issued by National Bank of Poland in PLN, government debt securities in CZK, EUR and USD and other debt securities meeting the criteria of collateral for a refinancing loan with National Bank of Poland and the eligibility criteria for secured financing transactions with the central banks of the Czech Republic and Slovakia.

The amount of mBank’s liquidity reserves as at 31 December 2025 and 31 December 2024 is presented in the table below.

mBank's value of Liquidity Reserves (in PLN million)	
31.12.2025	31.12.2024
68 921	68 247

In addition, mBank also maintains cash surpluses placed on accounts with central banks in Poland, the Czech Republic and Slovakia. As of December 31, 2025 the Bank accumulated a total PLN 39.3 billion on nostro accounts and interbank deposits (increase by around PLN 4 billion compared to 2024).

In mBank Group the Liquidity Reserves are held also by mBank Hipoteczny (mBH). Liquidity Reserves of mBH were composed of the Polish Government debt securities in PLN and bills issued by the National Bank of Poland in PLN. The value of the reserves as at 31 December 2025 and 31 December 2024 is presented below:

mBH's value of Liquidity Reserves (in PLN million)	
31.12.2025	31.12.2024
770	1 280

In order to support the process of liquidity risk management, a system of early warnings indicators was developed in the Bank. It is composed of indicators monitoring the level of regulatory and internal limits and additionally, indicators monitoring significant changes of market factors, as well as changes in mBank’s balance sheet structure (including concentrations) and volume changes, as well as the stability of the deposit base) and changes in the perception of the Bank’s Group brand by customers and other market participants.

Due to the lack of necessity of financing in foreign currencies through currency swaps and CIRS instruments, these instruments are used to invest surplus liquidity in foreign currencies. However, the Bank has an internal total limit for internal limits on the use of these instruments. Moreover, in order to limit the maturity concentration in FX swaps, the amounts obtained in such transactions are monitored in monthly time bands up to 1 year. Other measures of liquidity risk are calculated and reported in mBank as follows:

- concentration of sources and maturity dates of financing (in 2025, a new Early Warning Indicator was implemented as part of the early warning framework. The indicator serves as a tool for monitoring liquidity risk related to the maturity of long term funding),
- stability of deposit base,
- early withdrawals of deposits,
- ratio of long-term funding for the real estate market,
- long-term funding ratio (introduced by PFSA),
- liquidity risk concentration within off-balance sheet positions related to related to financial and guarantee liabilities.

For the purposes of ongoing liquidity monitoring, the mBank Group calculates the values of the adjusted, cumulative liquidity gap based on the internally adopted LAB methodology. In line with this methodology, the mBank Group calculates the adjusted liquidity gap in the baseline scenario (LAB Base Case) as well as in stress scenarios, assuming a conservative approach to the presentation of asset liquidity and the level of outflows resulting from the fulfilment of obligations. The adjusted gap is calculated on the basis of contractual cash flows. Adjustments are applied primarily to cash flows in the portfolios of non-bank customer deposits, overdraft loans, and term loans. When calculating liquidity measures, the mBank Group also takes into account potential possibilities of obtaining funds through the liquidation or pledging of securities held within the liquidity reserve.

In the LAB methodology, the LAB Base Case measure is the primary management measure and it is also used for limiting the liquidity gap in particular foreign currencies.

Value of realistic cumulative gap of cash flows misfit (in PLN million) on mBank Group level				
Time bucket	LAB Base Case - 31.12.2025		LAB Base Case - 31.12.2024	
	bucket	cumulative	bucket	cumulative
up to 1 working day	71 538	71 538	61 407	61 407
up to 3 working days	3 866	75 404	1 765	63 172
up to 7 calendar days	-	75 404	-	63 172
up to 15 calendar days	(3 105)	72 299	(2 822)	60 350
up to 1 month	(5 325)	66 974	(6 068)	54 282
up to 2 months	(5 470)	61 504	1 739	56 021
up to 3 months	(4 086)	57 418	(2 975)	53 046
up to 4 months	(3 215)	54 203	(1 956)	51 090
up to 5 months	(3 020)	51 183	(162)	50 928
up to 6 months	(1 625)	49 558	(1 522)	49 406
up to 7 months	(1 772)	47 786	(1 416)	47 990
up to 8 months	(1 521)	46 265	(1 627)	46 363
up to 9 months	(7 123)	39 142	(2 752)	43 611
up to 10 months	(1 992)	37 150	(977)	42 634
up to 11 months	(491)	36 659	(1 285)	41 349
up to 12 months	(1 366)	35 293	(1 436)	39 913

The above values should be interpreted as liquidity surpluses/shortages in the aforementioned time buckets. In 2025, an increase of deposit base and the moderate dynamics of lending had a direct impact on strengthening the liquidity position.

LAB cash flows gaps mismatch in terms up to 1 month and up to 1 year and values of regulatory measures LCR and NSFR at the end of 2025 and 2024 are presented in the following table:

	31.12.2025	31.12.2024
LAB Base Case 1M	66 974	54 282
LAB Base Case 1Y	35 293	39 913
LCR	244%	232%
NSFR	174%	164%*

LAB measures are shown in PLN million, LCR and NSFR are relative measures presented as as percentage ratios.

* Value before retrospective inclusion of profits.

The LCR and NSFR measures remained on safe level, significantly exceeding 100%.

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	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)					98 299	94 117	91 867	89 097
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	146 070	141 576	138 271	134 775	11 117	10 560	10 286	10 095
3	<i>Stable deposits</i>	105 135	103 288	100 450	96 990	5 257	5 164	5 022	4 849
4	<i>Less stable deposits</i>	40 935	38 288	37 821	37 785	5 860	5 396	5 264	5 246
5	Unsecured wholesale funding	60 842	59 019	57 599	56 688	27 164	26 298	25 450	25 009
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	8 425	8 176	8 183	8 058	2 020	1 959	1 961	1 932
7	<i>Non-operational deposits (all counterparties)</i>	52 024	50 412	49 172	48 376	24 750	23 908	23 245	22 823
8	<i>Unsecured debt</i>	393	431	244	254	393	431	244	254
9	<i>Secured wholesale funding</i>					-	-	-	-
10	Additional requirements	33 041	30 277	27 878	25 532	4 131	4 121	4 175	4 269
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	1 432	1 539	1 654	1 842	1 432	1 539	1 654	1 842
12	<i>Outflows related to loss of funding on debt products</i>	-	-	-	-	-	-	-	-
13	<i>Credit and liquidity facilities</i>	31 609	28 738	26 224	23 690	2 699	2 582	2 521	2 427
14	Other contractual funding obligations	2 542	2 426	2 540	2 259	2 163	2 056	2 179	1 919
15	Other contingent funding obligations	12 504	14 682	16 831	18 579	916	860	858	939
16	TOTAL CASH OUTFLOWS					45 491	43 895	42 948	42 231
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	17 340	16 700	16 412	15 571	-	-	-	-
18	Inflows from fully performing exposures	3 271	2 982	2 909	2 843	2 270	1 981	1 908	1 848
19	Other cash inflows	581	625	650	721	581	625	649	721
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	21 193	20 307	19 971	19 135	2 852	2 606	2 557	2 569
EU-20a	<i>Fully exempt inflows</i>	-	-	-	-	-	-	-	-
EU-20b	<i>Inflows subject to 90% cap</i>	-	-	-	-	-	-	-	-
EU-20c	<i>Inflows subject to 75% cap</i>	21 193	20 307	19 971	19 135	2 852	2 606	2 557	2 569
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					98 299	94 117	91 867	89 097
22	TOTAL NET CASH OUTFLOWS					42 639	41 289	40 391	39 662
23	LIQUIDITY COVERAGE RATIO					230%	228%	227%	225%

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

As of December 31, 2025, the LCR of mBank Group reached 244% and the LCR measure remained on a safe level, significantly exceeding 100%.

In 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 27.9 billion compared to the end of 2024 (PLN 28.8 billion excluding FX effects),
- an increase in lending activity by PLN 11.3 billion compared to the end of 2024 (PLN 11.5 billion excluding FX effects).

Under the EMTN program, the mBank carried out two bond issuances in 2025. These included the issuance of subordinated capital instruments qualifying as Additional Tier 1 (AT1) in the amount of PLN/EUR 400 million, which were recognised as Additional Tier 1 instruments, as well as the issuance of so-called green own bonds in the form of non-preferred senior (NPS) notes in the amount of EUR 500 million, what additionally increased the mBank Group liquidity.

As of December 31, 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 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,
- government-guaranteed bonds from the Polish Development Fund and Bank Gospodarstwa Krajowego– in PLN, EUR and USD,
- excess of the required reserve in the National Bank of Poland, the Czech National Bank and the National Bank of Slovakia,
- funds held with central banks in the form of deposits, and reverse repo transactions with central banks.

Within the mBank Group, mBank Hipoteczny S.A. also maintains liquidity buffer. The liquidity buffer of mBank Hipoteczny S.A. consisted of Polish Treasury bonds denominated in PLN, National Bank of Poland money market bills, and the surplus of the mandatory reserve held with the National Bank of Poland.

The main source of financing are deposits, which as of December 31, 2025 accounted for 92.37% of all external sources of financing. The deposit base is diversified, and the deposits of the 10 largest customers as of December 31, 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 December 31, 2025, the impact of the adverse market scenario on derivatives accounted for 0.27% of the total unweighted outflow value included in the LCR.

Information regarding NSFR

In the tables below, quantitative data on the NSFR ratio are presented as of 31 December 2025, 30 September 2025, 30 June 2025 and 31 March 2025 (data in millions of PLN). The data as of 30 September 2025, 30 June 2025, and 31 March 2025 has been recalculated after retrospective inclusion of profits.

EU LIQ2: Net Stable Funding Ratio, addressing disclosure requirements of art. 451a point 3) of CRR Regulation.

The following overview concerns the NSFR ratio as at 31 December 2025.

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1 rok	
Available stable funding (ASF) Items						
1	Capital items and instruments	20 368	-	-	3 404	23 771
2	Own funds	20 368	-	-	2 521	22 888
3	Other capital instruments		-	-	883	883
4	Retail deposits		158 522	-	-	148 066
5	Stable deposits		107 932	-	-	102 535
6	Less stable deposits		50 590	-	-	45 531
7	Wholesale funding:		68 736	818	13 155	43 161
8	Operational deposits		9 927	-	-	4 963
9	Other wholesale funding		58 809	818	13 155	38 197
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	-	19 017	14	88	95
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		19 017	14	88	95
14	Total available stable funding (ASF)					215 093
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					9 324
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		2	-	8 671	7 372
16	Deposits held at other financial institutions for operational purposes		200	-	-	100
17	Performing loans and securities:		13 416	7 920	99 620	90 361
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		273	315	1 890	2 075
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		11 033	5 535	45 678	47 085
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		267	197	123	312
22	Performing residential mortgages, of which:		2 062	1 810	50 062	39 334
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		479	472	25 773	17 228
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		49	259	1 990	1 868
25	Interdependent assets					
26	Other assets:		51 514	344	7 222	13 848
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	763	649
29	NSFR derivative assets		-	-	-	-
30	NSFR derivative liabilities before deduction of variation margin posted		48	-	-	2
31	All other assets not included in the above categories		51 466	344	6 458	13 196
32	Off-balance sheet Items		7 422	10 621	29 354	2 668
33	Total RSF					123 673
34	Net Stable Funding Ratio (%)					174%

As of December 31, 2025, the Net Stable Funding Ratio (NSFR) of mBank Group reached the level of 174% and remained at a safe level, significantly exceeding 100%.

The following overview concerns the NSFR ratio as at 30 September 2025.

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1 rok	
Available stable funding (ASF) Items						
1	Capital items and instruments	20 430	-	-	3 426	23 856
2	Own funds	20 430	-	-	2 614	23 044
3	Other capital instruments		-	-	812	812
4	Retail deposits		148 678	-	-	139 120
5	Stable deposits		106 187	-	-	100 877
6	Less stable deposits		42 491	-	-	38 242
7	Wholesale funding:		61 821	575	10 056	37 317
8	Operational deposits		8 365	-	-	4 182
9	Other wholesale funding		53 457	575	10 056	33 135
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	-	18 572	48	79	103
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		18 572	48	79	103
14	Total available stable funding (ASF)					200 396
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					6 715
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		1	-	8 556	7 273
16	Deposits held at other financial institutions for operational purposes		192	-	-	96
17	Performing loans and securities:		13 135	7 144	85 870	78 946
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		730	258	2 263	2 465
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		10 785	5 353	39 612	41 735
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		162	165	16	174
22	Performing residential mortgages, of which:		1 504	1 412	42 038	32 897
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		391	398	21 466	14 348
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		116	120	1 957	1 848
25	Interdependent assets		-	-	-	-
26	Other assets:		33 132	1 232	20 388	28 861
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	557	474
29	NSFR derivative assets		-	-	-	-
30	NSFR derivative liabilities before deduction of variation margin posted		64	-	-	3
31	All other assets not included in the above categories		33 067	1 232	19 831	28 385
32	Off-balance sheet items		7 650	8 600	27 558	2 476
33	Total RSF					124 368
34	Net Stable Funding Ratio (%)					161%

As of September 30, 2025, the Net Stable Funding Ratio (NSFR) of mBank Group reached the level of 161% and remained at a safe level, significantly exceeding 100%.

The following overview concerns the NSFR ratio as at 30 June 2025.

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1 rok	
Available stable funding (ASF) Items						
1	Capital items and instruments	19 513	-	-	1 896	21 409
2	Own funds	19 513	-	-	1 183	20 696
3	Other capital instruments		-	-	713	713
4	Retail deposits		129 189	-	14 908	135 938
5	Stable deposits		95 210	-	10 218	100 667
6	Less stable deposits		33 979	-	4 689	35 271
7	Wholesale funding:		60 957	339	12 114	38 510
8	Operational deposits		8 595	-	-	4 297
9	Other wholesale funding		52 362	339	12 114	34 212
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	755	19 645	183	83	175
12	NSFR derivative liabilities	755				
13	All other liabilities and capital instruments not included in the above categories		19 645	183	83	175
14	Total available stable funding (ASF)					196 031
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					7 661
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		1	-	8 410	7 149
16	Deposits held at other financial institutions for operational purposes		298	-	-	149
17	Performing loans and securities:		13 949	7 166	86 592	79 860
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1 068	131	2 090	2 262
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		10 959	5 651	41 121	43 255
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		160	156	13	167
22	Performing residential mortgages, of which:		1 699	1 307	41 628	32 642
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		387	395	21 225	14 187
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		223	77	1 753	1 701
25	Interdependent assets		-	-	-	-
26	Other assets:	-	31 662	880	16 340	24 276
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	770	654
29	NSFR derivative assets		-	-	-	-
30	NSFR derivative liabilities before deduction of variation margin posted		-	-	-	-
31	All other assets not included in the above categories		31 662	880	15 570	23 622
32	Off-balance sheet items		7 824	8 127	26 873	2 418
33	Total RSF					121 514
34	Net Stable Funding Ratio (%)					161%

As of June 30, 2025, the Net Stable Funding Ratio (NSFR) of mBank Group reached the level of 161% and remained at a safe level, significantly exceeding 100%.

The following overview concerns the NSFR ratio as at 31 March 2025.

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1 rok	
Available stable funding (ASF) Items						
1	Capital items and instruments	18 549	-	-	1 875	20 424
2	Own funds	18 549	-	-	1 250	19 798
3	Other capital instruments		-	-	626	626
4	Retail deposits		125 733	-	14 670	132 422
5	Stable deposits		91 854	-	10 707	97 969
6	Less stable deposits		33 879	-	3 963	34 453
7	Wholesale funding:		57 871	430	9 648	35 419
8	Operational deposits		8 717	-	-	4 358
9	Other wholesale funding		49 154	430	9 648	31 060
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	102	20 528	91	84	130
12	NSFR derivative liabilities	102				
13	All other liabilities and capital instruments not included in the above categories		20 528	91	84	130
14	Total available stable funding (ASF)					188 395
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					7 293
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		2	-	8 186	6 960
16	Deposits held at other financial institutions for operational purposes		256	-	-	128
17	Performing loans and securities:		12 054	6 614	82 871	75 782
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		510	169	1 895	2 030
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		9 794	5 167	39 717	41 235
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		131	134	26	149
22	Performing residential mortgages, of which:		1 657	1 171	39 533	30 889
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		377	380	20 640	13 795
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		92	108	1 725	1 627
25	Interdependent assets		-	-	-	-
26	Other assets:		29 345	1 085	16 917	25 560
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	1 324	1 126
29	NSFR derivative assets		-	-	-	-
30	NSFR derivative liabilities before deduction of variation margin posted		176	-	-	9
31	All other assets not included in the above categories		29 169	1 085	15 592	24 425
32	Off-balance sheet items		6 749	8 961	26 754	2 412
33	Total RSF					118 135
34	Net Stable Funding Ratio (%)					159%

As of March 31, 2025, the Net Stable Funding Ratio (NSFR) of mBank Group reached the level of 159% and at a safe level, significantly exceeding 100%.

11. Remuneration Policy for employees having material impact on the risk profile

Under the CRR and the Banking Law Act, mBank is obliged to publicly disclose qualitative and quantitative information regarding its remuneration policy. The information provided below complies with the scope of disclosures in table EU REMA.

Information on the process of determining the policy of variable components of remuneration

mBank has in place the Remuneration Policy for Employees Having a Material Impact on the Risk Profile of mBank S.A. (hereinafter referred to as the "Remuneration Policy"), which was adopted for the first time by the Supervisory Board in December 2011. Since then, the Remuneration Policy has been subject to annual verification. The Remuneration Policy applicable in 2024 was approved by Resolution of the Supervisory Board No. 39/24 of December 12, 2024 and Resolution No. 138/25 of December 12, 2025.

The adopted Remuneration Policy is compliant with:

1. Polish Banking Law Act of 29 August 1997 implementing Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (as amended – Directive (EU) 2019/878 of the European Parliament and of the Council of 20 May 2019),
2. Regulation of the Minister of Finance, Development Funds and Regional Policy of June 8, 2021 on the Risk Management System, Internal Control System and Remuneration Policy at Banks,
3. Guidelines on sound remuneration policies under Directive 2013/36/EU (EBA/GL/2021/04 of 2 July 2021),
4. Recommendation Z of the Polish Financial Supervision Authority on the Principles of Internal Governance at Banks.

The adopted Remuneration Policy:

1. supports sound and effective risk management and does not encourage employees to take excessive risk exceeding the general acceptable risk level approved by the Supervisory Board of the Bank,
2. supports the implementation of the Bank management strategy and risk management strategy, including environmental, social and governance (ESG) risk, its corporate culture and values, risk culture, including with regard to long-term interests of the Bank, and limits conflicts of interest,
3. supports responsible and prudent capital management. In particular, prior to making a decision on the payment of variable components of remuneration, the following is taken into consideration: the current and forecast capital position and the provisions of the Act on Macroprudential Supervision over the Financial System and Crisis Management in the Financial System pertaining to the calculation of the maximum distributable amount (MDA),
4. sets out the remuneration rules for employees identified as having a material impact on the risk profile of the Bank („Risk Takers”) by determining fixed and variable components of remuneration,
5. ensures transparent rules of determining and paying the bonus, being a component of variable remuneration,
6. is gender neutral.

The Risk Takers Identification Policy (hereinafter referred to as the "Identification Policy"), approved by the Bank's Management Board, the Remuneration and Nomination Committee and the Supervisory Board of the Bank, sets out criteria and the process for identifying persons whose professional activities have a material impact on mBank's risk profile (Risk Takers); the document meets the requirements arising from:

1. Commission Delegated Regulation (EU) 2021/923 of 25 March 2021 supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to regulatory technical standards setting out the criteria to define managerial responsibility, control functions, material business units and a significant impact on a material business unit's risk profile, and setting out criteria for identifying staff members or categories of staff whose professional activities have an impact on the institution's risk profile that is comparably as material as that of staff members or categories of staff referred to in Article 92 (3) of that Directive,
2. Regulation of the Minister of Finance, Development Funds and Regional Policy of June 8, 2021 on the Risk Management System, Internal Control System and Remuneration Policy at Banks,

The Identification Policy, similarly to the Remuneration Policy, is subject to annual verification.

Moreover, in line with Article 90d (1) of the Act of July 29, 2005 on Public Offering and Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, on March 27, 2024, the General Meeting of mBank S.A. adopted the Remuneration Policy for Members of the Management Board and Members of the Supervisory Board of mBank S.A. In 2025 the wording introduced by Resolution of the Supervisory Board No. 97/25 of March 27, 2025 was in force. With regard to Management Board Members, the Remuneration Policy for Members of the Management Board and Members of the Supervisory Board of mBank S.A. is applied only to the extent not governed by the Remuneration Policy. With regard to

Supervisory Board Members, the Remuneration Policy for Members of the Management Board and Members of the Supervisory Board of mBank S.A. indicates that the remuneration of Supervisory Board Members is determined by way of a resolution of the General Meeting.

Remuneration and Nomination Committee of the Supervisory Board of mBank

The Remuneration and Nomination Committee operates as part of the Supervisory Board. The Committee provides consultancy and advisory to the Supervisory Board and performs other tasks arising from its rules, applicable laws, and regulatory recommendations and guidelines. As at December 31, 2025, the Committee was composed as follows:

- Prof. Agnieszka Słomka-Gołębiowska – Committee Chairwoman,
- Tomasz Bieske,
- Aleksandra Gren,
- Carsten Schmitt,
- Bernhard Spalt.

Pursuant to the applicable Rules of the Remuneration Committee, its main tasks include:

1. issuing opinions, at least once a year, on the remuneration policies adopted at the Bank, submitting proposals for changes and providing opinions to the Supervisory Board in this respect,
2. monitoring the remuneration policies applicable at the Bank and supporting the Bank's governing bodies in the scope of the supervision, development and implementation of these policies,
3. verifying the Identification Policy on an annual basis, including reviewing the criteria and the process for taking decisions, submitting proposals for changes and providing opinions to the Supervisory Board in this respect,
4. assessing the functioning of the remuneration policies on an annual basis and assessing, at least once every four years, the Remuneration Policy for Members of the Management Board and Members of the Supervisory Board of mBank S.A., taking into account the applicable regulatory requirements, as well as providing the assessment results to the Supervisory Board,
5. verifying indicators (KPIs) for a given calendar year adopted to calculate the bonus pool and verifying the final bonus pool of mBank Group,
6. monitoring the level and structure of remuneration, in particular remuneration for the Risk Takers, and issuing recommendations on general guidelines for the Management Board regarding the level and structure of remuneration for Risk Takers, with particular emphasis on persons holding managerial positions in the independent control function, including risk management, compliance and internal audit functions as well as the security function,
7. With respect to the Bank's Management Board Members, the tasks of the Committee include:
 - a) considering matters related to the remuneration rules applicable to Management Board Members and the level of their remuneration, including approving templates of management contracts and recommending to the Supervisory Board the amount of base remuneration, benefits and the amount of severance pay,
 - b) setting and evaluating objectives and results for Management Board Members, including their scorecards,
 - c) recommending to the Supervisory Board the definitions of key performance indicators (KPIs) that underlie the calculation of the bonus pool for a given calendar year, the number of KPIs, and the percentage share of each KPI in the bonus pool; verifying the bonus pool for Management Board Members and recommending to the Supervisory Board the distribution of this pool among individual Management Board Members,
 - d) determining, on an annual basis, the situation of mBank Group in connection with Article 142 (2) of the Banking Law Act (i.e. solvency / liquidity status of mBank Group) for the purposes of determining the amount of bonuses for Management Board Members; recommending to the Supervisory Board a suspension in whole or a decrease in the amount of the aforementioned bonus,
 - e) issuing opinions for the Supervisory Board on reducing, suspending or returning the payment in whole or on decreasing the amount of the non-deferred and deferred bonus of Management Board Members in accordance with the provisions of the Remuneration Policy,
 - f) issuing opinions for the Supervisory Board on suspending the payment in whole or in part or decreasing the amount of severance pay for Management Board Members in line with the provisions of management contracts,
 - g) presenting opinions on granting permission to Management Board Members to engage in competitive activity or to sit on management or supervisory boards of companies outside mBank Group,

- h) making other decisions or carrying out other activities defined in or arising from the Remuneration Policy or the contracts concluded with Management Board Members.

On 12 December 2025, the Supervisory Board adopted the new Rules of the Remuneration and Nomination Committee. New points have been added to the Remuneration and Nomination Committee tasks:

1. recommending the adoption of the report on remuneration of members of the Management Board and the Supervisory Board of mBank S.A. to the Supervisory Board,
2. proposing a higher maximum ratio of variable to fixed remuneration to the Supervisory Board,

The scope of responsibilities of the Remuneration and Nomination Committee has also been updated with regard to the members of the Management Board of mBank S.A., which includes, among other things, concerning the remuneration principles and the amount of remuneration of the Management Board members, in particular:

- a) approving model management contracts signed with the Management Board members,
- b) determining the detailed terms of contracts with the Management Board members within the framework of terms adopted by the Supervisory Board,
- c) recommending the amounts of base remuneration, benefits and severance pay to the Supervisory Board,
- d) setting and evaluating MbO (Management by Objectives) goals for the Management Board members as well as evaluating the MbO target achievement of the Management Board members,
- e) determining annually the financial situation of mBank Group, i.e. its solvency/liquidity status, for the purpose of determining the amount of bonuses for the Management Board members, and recommending the non-payment or reduction of these bonuses to the Supervisory Board,
- f) recommending the reduction, non-payment or full clawback of non-deferred and deferred bonuses of the Management Board members to the Supervisory Board in accordance with the Risk Takers Remuneration Policy,
- g) recommending the non-payment in whole or in part or reduction of the amounts of severance pay for the Management Board members to the Supervisory Board in accordance with the management contracts signed with the Management Board members,
- h) taking other decisions or actions as set forth in Risk Takers Remuneration Policy or in the management contracts signed with the Management Board members.

The amendments to the Rules of the Remuneration and Nomination Committee, in the part concerning remuneration, were primarily aimed at ensuring consistency with the bank's internally binding legal acts and the business models adopted by the bank.

In 2025, the Remuneration and Nomination Committee and the Supervisory Board, which supervises the remuneration area at the Bank, held nine and ten meetings, respectively.

Process of determining the policy of variable remuneration components

The annual process of verifying and introducing appropriate amendments to the Remuneration Policy and the Identification Policy is coordinated by the Director of the Employee Relations and Organisation Culture Department (organisational unit reporting directly to the President of the Management Board), who is supported by a team of employees responsible for risk management, legal issues and compliance (among others, with regard to issues related to the selection of criteria for indicating the positions having a material impact on the risk profile and compliance of applicable policies with regulatory requirements and market practices in this scope).

The Remuneration Policy and the Identification Policy are assessed and modified by the Supervisory Board based on the recommendation of the Bank's Management Board and taking into account the opinion of the Remuneration and Nomination Committee.

Key information concerning the determination of remuneration in 2025

The total remuneration of the Members of the Management Board of the Bank and other employees having a material impact on the risk profile of the Bank has been divided into a fixed part (annual base remuneration and fixed benefits) and a variable part. The bonus, which is awarded and paid in accordance with the rules laid down in the Remuneration Policy, is a part of the variable remuneration.

The variable remuneration is determined in a clear and verifiable manner that ensures effective implementation of the Remuneration Policy. The maximum level of variable remuneration components of persons subject to the Remuneration Policy cannot exceed 100% of the base remuneration (in the case of Management Board Members) or the fixed remuneration (in the case of other employees) for a given calendar year.

The variable remuneration is partially paid in the form of subscription warrants issued and exercisable on the terms and within the time limits set forth in the Incentive Programme and in the Incentive Programme Rules.

The maximum ratio of the average total gross remuneration of the Management Board Members on an annual basis to the average total gross remuneration of other Bank employees on an annual basis was set as the amount not higher than 50 times the average total remuneration of an employee of the Bank.

Members of the Bank's Management Board (Risk Takers I):

The Supervisory Board determines the bonus amount for a given calendar year for every Management Board Member individually based on their performance assessment result. The assessment result is the weighted average of results from the calendar year for which the bonus is awarded and the two preceding years. The content of the scorecards for a given year, the definition of each objective, the manner of determining how objectives are to be achieved and the assessment result are decided by the Supervisory Board.

If a Management Board Member's performance assessment result reaches 100%, the bonus amounts to eight times their monthly base salary. Base salary is the average of monthly salaries from a given calendar year (or months in a calendar year when the individual concerned served as a Management Board Member). A result above or below 100% entails a proportional recalculation of the bonus.

In principle, one of the conditions for the payment of variable remuneration components to Management Board Members is reaching a performance assessment result of at least 50%. However, the Supervisory Board, taking into consideration external macroeconomic, fiscal and regulatory circumstances, has the right to award a bonus to a Management Board Member who achieved all their objectives at a level below 50%.

MbO structure and categories of goals

Goals for the Management Board Members are derived from:

- 1/ strategic aspirations of mBank Group, including sustainability risk aspirations,
- 2/ long-term objectives set out in the multi-year financial plan,
- 3/ annual financial plan.

The objectives for Management Board Members for a given calendar year are subject to the Supervisory Board's approval based on the recommendation of the Remuneration and Nomination Committee.

In 2025, the Bank implemented a new Management by Objectives (MbO) model for the Management Board Members. This revised approach reflects the collective accountability of the Management Board for the Group's strategy, which considers sustainability a key strategic area.

The new approach incorporates both the Group's key performance indicators (KPIs) and individual contributions of the Management Board Members within their respective areas of responsibility. The MbO model is based on three categories of goals applicable to all Management Board Members, with each category carrying the same weight for every Management Board Member.

- 1/ **Group goals (60% weight)** are critical to the overall level of goal achievement and thus are the main factor affecting variable compensation. Group goals are aligned with the group's strategy and the medium-term plan, supporting sustainable, performance-oriented growth.

In 2025, the group goal category includes three objectives:

- operating result,
- cost/income (C/I) ratio,
- ESG.

Sustainability-related goals are an integral part of the Management Board's responsibility and are a core component of the group goals category, reflecting the importance of ESG across all key stakeholder groups.

- 2/ **Segmental goals (30% weight)** are set for each Management Board member in accordance with their areas of business responsibility. They are derived from the corporate and segment strategy as well as the multi-year plan. They can also relate to material issues, such as regulatory aspects and compliance assurance.
- 3/ **Individual goals (10% weight)** may also reflect other priorities related to the area of responsibility of an individual Management Board Member.

The maximum level of achievement for each group, sectoral and individual goal is capped at 150%.

The bonus consists of the non-deferred part (40% of the bonus) and the deferred part (60% of the bonus).

Both the deferred part and the non-deferred part are divided into equal portions: 50% paid in cash and 50% paid in subscription warrants. The non-deferred part in cash is paid in the year in which the bonus is awarded. The other half of the non-deferred part (50%) is paid in the form of subscription warrants, not earlier than after 12 months from the date on which the consolidated financial statements for a given calendar year are approved.

The deferred part, both the cash portion and the subscription warrant portion, is paid in the subsequent calendar years, starting from the year following the year for which the bonus is awarded, in five equal annual tranches. In each tranche, the cash portion is paid after the consolidated financial statements of mBank Group for the previous calendar year are approved, while the subscription warrant portion is paid not earlier than after 12 months from the date of approval of the consolidated financial statements.

In particularly justified cases when there is a need to mitigate the risk connected with maintaining a sound capital base of the Bank, enabling it to effectively respond to the economic situation in Poland and external circumstances beyond the Bank's control, the Supervisory Board may adopt a resolution to pay the cash tranche in whole or in part (both the non-deferred and deferred tranche) in the form of subscription warrants, in accordance with the rules set out above.

Employees who are not Management Board Members and who have a material impact on the Bank's risk profile (Risk Takers II):

The Bank's Management Board assesses the performance of an employee on an annual basis and in longer periods; where the employee is found to have accomplished the objectives, the Bank's Management Board can decide to set a bonus amount, taking into account the total remuneration of the employee. The decision on the bonus amount is made at the sole discretion of the Bank's Management Board, which in accordance with its independent assessment and decision confirms the accomplishment of the employee's objectives, taking into account the situation in financial markets in the last financial period / previous financial periods. The bonus amount cannot be higher than the employee's annual fixed remuneration (total of the base remuneration paid to the employee every month in the year for which the bonus and fixed benefits are awarded).

Risk Takers II have set objectives in accordance with the OKR (Objectives and Key Results) approach. In accordance with the OKR approach, objectives are transparent, monitored quarterly and can be set for several areas jointly (cross area objectives).

The objectives for Risk Takers II to be achieved in the next calendar year are set in cooperation with the Bank's Management Board Members by December 31 of the previous year, and then communicated to managers and teams. As a general rule, objectives are either financial or qualitative. The proportions between them depend on the priorities of a given area.

The variable remuneration paid to the heads of the internal audit unit, the compliance unit, the legal unit and the units responsible for second-level risk management and HR issues depends on achieving goals resulting from their functions and does not depend on the financial performance of the Bank's areas supervised by them.

If the amount of the variable remuneration determined by the Bank's Management Board does not exceed:

1. one-third of the total annual remuneration (base remuneration plus bonus), or
2. the PLN equivalent of EUR 50,000 (specified in the decision granting the bonus),

the Bank's Management Board may decide not to defer the variable remuneration and pay the variable remuneration in whole in the form of non-deferred cash instead. This rule does not apply to Risk Taker II, whose position is identified as a senior management position at the Bank (Managing Directors of the Bank) or as a Member of an mBank Group subsidiary's Management Board.

If the amount of the variable remuneration exceeds the assumed limits, the bonus consists of the non-deferred part (60% of the bonus) and the deferred part (40% of the bonus). Where the bonus for a Risk Taker II is particularly high, i.e. amounts to EUR 180,000 or more, then the proportions are reversed and amount to 40% non-deferred and 60% deferred.

Both the deferred part and the non-deferred part are divided into equal portions: 50% paid in cash and 50% paid in financial instruments, i.e.:

- 1/ subscription warrants – in the case of a Risk Taker II – bank employee and Risk Taker II – Member of the Management Board of a subsidiary, excluding Members of the Management Board of mBank Hipoteczny S.A. and mTFI S.A.,
- 2/ phantom shares – in the case of a Risk Taker II – Member of the Management Board of mBank Hipoteczny S.A., pursuant to the rules stipulated in the regulations of mBank Hipoteczny S.A.,

- 3/ shares in the funds managed by the investment fund company – in the case of a Risk Taker II – Member of the Management Board of mTFI S.A. pursuant to the rules stipulated in regulations of mTFI S.A.

The non-deferred part in cash is paid in the year in which the bonus is awarded. The other half of the non-deferred part (50%) is paid in the form of the aforesaid financial instruments, not earlier than after 12 months from the approval date of the consolidated financial statements of mBank Group for the previous calendar year, and in the case of a subsidiary, not earlier than after 12 months from the approval date of the financial statements of the subsidiary for the previous calendar year.

The deferred part, both paid in cash and in the aforesaid financial instruments, is paid in the subsequent calendar years, starting from the year following the year for which the bonus is awarded:

1. in five equal tranches to Risk Takers II – Managing Directors of the Bank, and Risk Takers II – Members of the Management Board of an mBank Group subsidiary,
2. in four equal tranches to the remaining Risk Takers II – the Bank's employees.

In each tranche, the cash portion is paid to Risk Takers II after the consolidated financial statements of mBank Group for the previous calendar year are approved, while in the case of the subsidiaries, not earlier than after 12 months from the approval date of the subsidiary's financial statements of the previous calendar year. The other portion is paid in the form of the aforesaid financial instruments, not earlier than after 12 months from the approval date of the consolidated financial statements of mBank Group for the previous calendar year, and in the case of a subsidiary, not earlier than after 12 months from the approval date of the financial statements of the subsidiary for the previous calendar year.

In particularly justified cases when there is a need to mitigate the risk connected with maintaining a sound capital base of the Bank, enabling it to effectively respond to the economic situation in Poland and external circumstances beyond the Bank's control, the Bank's Management Board may adopt a resolution to pay the cash tranche in whole or in part (both the non-deferred and deferred tranche) in the form of subscription warrants, in accordance with the rules set out above.

The costs resulting from the deferred tranches in the form of subscription warrants are settled in accordance with the IFRS.

Information on the performance assessment criteria which form the basis for the entitlement to remuneration components

In the case of Management Board Members (Risk Takers I), the Supervisory Board, based on a recommendation of the Remuneration and Nomination Committee, may decide not to award any bonus or withhold in whole or reduce the amount of the deferred cash and non-cash tranche if:

- 1/ it finds, as part of the annual assessment covering at least three years conducted in accordance with the Suitability Policy for Members of the Bank's Bodies, that a Management Board Member did not guarantee proper performance of duties entrusted to them, encompassing reputation, integrity, reliability, ethical conduct, and the ability to manage the Bank's affairs in a prudent and stable manner,
- 2/ the C/I ratio¹ is above the average C/I ratio of the Polish banking sector for the bonus year concerned,
- 3/ the Bank makes a loss on its core activity (operating profit is negative), or

any of the premises stipulated in Article 142 of the Banking Law Act, in particular in Article 142 (2), has occurred.

The full withholding or reduction of a bonus, as well as of any deferred tranche, may also apply to a bonus or a deferred tranche payable after the expiry or termination of the contract.

Accordingly, the Subsidiary's Supervisory Board, in the case of the Members of a Subsidiary's Management Board, and the Management Board of the Bank, in the case of Bank employees who are not Management Board Members, may decide not to award any bonus or withhold in whole or reduce the amount of the deferred cash and non-cash tranche if at least one condition set out in the scorecard is not met, in particular when the Management Board concludes that in a longer time horizon (i.e. a period of at least three years) a Risk Taker:

- a) had direct and negative impact on the financial result or the market position of the Bank or mBank Group in the period under assessment, or directly contributed to significant financial losses, or

¹ C/I (cost/income) ratio – relation of the Bank's operating costs and amortisation/depreciation to net banking income adjusted for net other operating income.

- b) materially violated the generally applicable laws or internal regulations, or
- c) violated the rules and standards adopted at mBank Group, among others, the rules and standards pertaining to mobbing, harassment, sexual harassment, other forms of discrimination and illegal or unethical behaviour that violates the rules of social coexistence, or
- d) has directly contributed to significant financial losses being the consequence of their deliberate adverse actions to the detriment of mBank Group or has contributed to financial sanctions being imposed on the Bank by supervisory bodies,

or if any of the premises stipulated in Article 142 of the Banking Law Act, in particular in Article 142 (2), has occurred.

Suspending the bonus or any deferred tranche in whole or decreasing its amount may also apply to the bonus or the deferred tranche paid out upon expiry or termination of the contract / contract of employment.

Moreover, a Risk Taker may be obliged, under the rules and within the time limit determined under a decision of, accordingly, the Bank's Supervisory Board or Management Board, to return the bonus awarded and paid for a given calendar year (i.e. the non-deferred part and all deferred parts), if the Risk Taker materially violated the generally applicable laws or internal regulations, violated the rules and standards adopted in mBank Group, or directly contributed to significant financial losses being the consequence of their deliberate adverse actions to the detriment of mBank Group, or contributed to financial sanctions being imposed on the Bank by supervisory bodies under a final and non-appealable decision.

The decision determining whether the said events occurred may be taken by the end of the calendar year in which the last tranche of the deferred part of the bonus awarded for the year in which the event occurred is paid.

Aggregated quantitative data regarding the remuneration paid to holders of managerial positions in the mBank S.A. Group

Template EU REM1 – Remuneration awarded for the financial year

		a	b	c	d	
		MB Supervisory function	MB Management function	Other senior management	Other identified staff	
1	Fixed remuneration	Number of identified staff	10	7	12	112
2		Total fixed remuneration	1 960	18 931	10 090	52 367
3		Of which: cash-based	1 915	14 400	9 619	50 552
4		(Not applicable in the EU)				
EU-4a		Of which: shares or equivalent ownership interests	-	-	-	-
5		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-5x		Of which: other instruments	-	-	-	-
6		(Not applicable in the EU)				
7		Of which: other forms	45	4 531	471	1 815
8	(Not applicable in the EU)					
9	Variable remuneration	Number of identified staff	-	-	-	-
10		Total variable remuneration	-	-	-	-
11		Of which: cash-based	-	-	-	-
12		Of which: deferred	-	-	-	-
EU-13a		Of which: shares or equivalent ownership interests	-	-	-	-
EU-14a		Of which: deferred	-	-	-	-
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-14b		Of which: deferred	-	-	-	-
EU-14x		Of which: other instruments	-	-	-	-
EU-14y	Of which: deferred	-	-	-	-	
15	Of which: other forms	-	-	-	-	
16	Of which: deferred	-	-	-	-	
17	Total remuneration (2 + 10)	1 960	18 931	10 090	52 367	

As of the publication date of this report, the variable remuneration for 2025 for the employees listed in the table above has not yet been approved by the relevant bodies of the mBank Group. This document will be amended promptly once the relevant bodies grant the variable remuneration for 2025 to the identified employees of the mBank Group.

Template EU REM 2 Special payments to employees whose professional activity has a material impact on the Bank's risk profile.

In 2025, no payments subject to disclosure under the REM2 form occurred within the mBank S.A. Group.

Template EU REM3 Deferred remuneration

	a	b	c	d	e	f	EU - g	EU - h
Deferred and retained remuneration	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1 MB Supervisory function	-	-	-	-	-	-	-	-
2 Cash-based	-	-	-	-	-	-	-	-
3 Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
4 Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
5 Other instruments	-	-	-	-	-	-	-	-
6 Other forms	-	-	-	-	-	-	-	-
7 MB Management function	22 925	8 289	14 636	-	-	-	6 129	2 160
8 Cash-based	9 036	3 118	5 918	-	-	-	3 118	-
9 Shares or equivalent ownership interests	13 889	5 171	8 719	-	-	-	3 011	2 160
10 Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
11 Other instruments	-	-	-	-	-	-	-	-
12 Other forms	-	-	-	-	-	-	-	-
13 Other senior management	12 092	6 112	5 980	-	-	-	4 420	1 692
14 Cash-based	4 936	2 201	2 736	-	-	-	2 201	-
15 Shares or equivalent ownership interests	7 156	3 911	3 244	-	-	-	2 219	1 692
16 Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
17 Other instruments	-	-	-	-	-	-	-	-
18 Other forms	-	-	-	-	-	-	-	-
19 Other identified staff	27 756	18 610	9 146	-	-	-	15 388	3 222
20 Cash-based	15 917	11 787	4 130	-	-	-	11 787	-
21 Shares or equivalent ownership interests	10 566	6 084	4 482	-	-	-	3 261	2 823
22 Share-linked instruments or equivalent non-cash instruments	618	345	272	-	-	-	150	195
23 Other instruments	655	393	262	-	-	-	189	204
24 Other forms	-	-	-	-	-	-	-	-
25 Total amount	62 773	33 010	29 763	-	-	-	25 936	7 074

Template EU REM4 - Remuneration of 1 million EUR or more per year

	EUR	a Identified staff that are high earners as set out in Article 450(i) CRR
1	1 000 000 to below 1 500 000	1
2	1 500 000 to below 2 000 000	-
3	2 000 000 to below 2 500 000	-
4	2 500 000 to below 3 000 000	-
5	3 000 000 to below 3 500 000	-
6	3 500 000 to below 4 000 000	-
7	4 000 000 to below 4 500 000	-
8	4 500 000 to below 5 000 000	-
9	5 000 000 to below 6 000 000	-
10	6 000 000 to below 7 000 000	-
11	7 000 000 to below 8 000 000	-

Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	a	b	c	d	e	f	g	h	i	j
	Management body remuneration			Business areas						
	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff									141
2	Of which: members of the MB	10	7	17						
3	Of which: other senior management			2	3	1	5	1	-	
4	Of which: other identified staff			6	36	9	23	31	7	
5	Total remuneration of identified staff	1 960	18 931	20 891	5 731	21 111	4 288	16 205	14 069	1 052
6	Of which: variable remuneration	-	-	-	-	-	-	-	-	-
7	Of which: fixed remuneration	1 960	18 931	20 891	5 731	21 111	4 288	16 205	14 069	1 052

As of the publication date of this report, the variable remuneration for 2025 for the employees listed in the table above has not yet been approved by the relevant bodies of the mBank Group. This document will be amended promptly once the relevant bodies grant the variable remuneration for 2025 to the identified employees of the mBank Group.

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 31 December 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 S.A. Group.

The Management Board of mBank S.A. approves this "Disclosures regarding capital adequacy of mBank S.A. Group as at 31 December 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)
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)