

**Disclosures regarding capital adequacy of  
mBank S.A. Group  
as at 31 March 2026**



Warsaw, 6th May 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 March 2026.

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

- Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637 (Regulation 2024/3172),
- Guidelines EBA/GL/2014/14 of 23 December 2014 on materiality, proprietary and confidentiality and on disclosure frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) No 575/2013,
- Disclosure Policy of mBank S.A. on capital adequacy available on website [www.mbank.pl](http://www.mbank.pl).

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.

In the prudential consolidation process, the same accounting principles were applied as those used in preparing the mBank S.A. Group Consolidated Financial Report for the first quarter of 2026, which includes Condensed Consolidated Financial Statements of mBank S.A. Group for the first quarter of 2026, 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 March 2026 in accordance with the CRR Regulation.

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

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

The prudentially consolidated financial data as at 31 March 2026 include the following entities:

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

Detailed information on consolidated entities included in consolidation is presented in mBank S.A. Group Consolidated Financial Report for the first quarter of 2026, in the Note 1 Information regarding the Group of mBank S.A.

The scope of entities included in prudential consolidation for the first quarter of 2026 was the same as the scope of entities included in accounting consolidation based on International Financial Reporting Standards (IFRS).

**3. Own funds**

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

The increase in own funds observed during the first quarter of 2026 compared to the level of own funds as of December 31, 2025, was primarily due to the inclusion of profit for the fourth quarter of 2025, following the decision of the General Meeting of Shareholders of mBank S.A. dated March 31, 2026, regarding the distribution of net profit for the year 2025, as well as the related decrease in current adjustments for specific credit risk. These changes were partially offset by an increase in the shortfall of credit risk adjustments relative to expected losses calculated under the IRB approach.

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

		a	b	c	d	e
		31.03.2026	31.12.2025	30.09.2025	30.06.2025	31.03.2025
	<b>Available own funds (amounts)</b>					
1	Common Equity Tier 1 (CET1) capital	17 712 477	16 717 713	16 094 337	15 181 647	14 499 548
2	Tier 1 capital	19 212 477	18 217 713	17 594 337	16 681 647	15 999 548
3	Total capital	21 687 744	20 738 610	20 208 513	17 864 931	17 249 190
	<b>Risk-weighted exposure amounts</b>					
4	Total risk exposure amount	135 902 445	126 885 115	121 130 820	119 056 148	112 376 374*
4a	Total risk exposure pre-floor	135 902 445	126 885 115	121 130 820	119 056 148	112 376 374
	<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>					
5	Common Equity Tier 1 ratio (%)	13.03%	13.18%	13.29%	12.75%	12.90%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	13.03%	13.18%	13.29%	12.75%	12.90%
6	Tier 1 ratio (%)	14.14%	14.36%	14.53%	14.01%	14.24%
6b	Tier 1 ratio considering unfloored TREA (%)	14.14%	14.36%	14.53%	14.01%	14.24%
7	Total capital ratio (%)	15.96%	16.34%	16.68%	15.01%	15.35%
7b	Total capital ratio considering unfloored TREA (%)	15.96%	16.34%	16.68%	15.01%	15.35%
	<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>					
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%
	<b>Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)</b>					
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%	1.02%	1.01%	0.08%	0.08%
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%	4.02%	4.01%	3.08%	3.08%
EU-11a	Overall capital requirements (%)	12.02%	12.02%	12.01%	11.08%	11.08%
12	CET1 available after meeting the total SREP own funds requirements (%)	7.96%	8.34%	8.53%	7.01%	7.35%
	<b>Leverage ratio</b>					
13	Total exposure measure	316 511 631	306 117 076	285 241 160	279 808 594	264 039 199
14	Leverage ratio (%)	6.07%	5.95%	6.17%	5.96%	6.06%
	<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>					
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%
	<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>					
EU-14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU-14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	<b>Liquidity Coverage Ratio (PLN millions)</b>					
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	104 620	98 299	94 117	91 867	89 097
EU-16a	Cash outflows - Total weighted value	47 378	45 491	43 894	42 948	42 231
EU-16b	Cash inflows - Total weighted value	2 857	2 852	2 606	2 557	2 569
16	Total net cash outflows (adjusted value)	44 521	42 639	41 289	40 391	39 662
17	Liquidity coverage ratio (%)	235%	230%	228%	227%	225%
	<b>Net Stable Funding Ratio (PLN millions)</b>					
18	Total available stable funding	222 518	215 093	200 542	195 072	187 689
19	Total required stable funding	126 937	123 673	124 367	121 514	118 135
20	NSFR ratio (%)	175%	174%	161%	161%	159%

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

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

		a	b	c	d	e
		31.03.2026	31.12.2025	30.09.2025	30.06.2025	31.03.2025
	<b>Available own funds (amounts)</b>					
1	Common Equity Tier 1 (CET1) capital	17 712 477	18 017 584	17 137 918	16 270 630	15 370 409
2	Tier 1 capital	19 212 477	19 517 584	18 637 918	17 770 629	16 870 409
3	Total capital	21 687 744	22 038 481	21 252 094	18 953 914	18 120 051
	<b>Risk-weighted exposure amounts</b>					
4	Total risk exposure amount	135 902 445	126 885 115	121 130 820	119 056 148	112 376 374
4a	Total risk exposure pre-floor	135 902 445	126 885 115	121 130 820	119 056 148	112 376 374
	<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>					
5	Common Equity Tier 1 ratio (%)	13.03%	14.20%	14.15%	13.67%	13.68%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	13.03%	14.20%	14.15%	13.67%	13.68%
6	Tier 1 ratio (%)	14.14%	15.38%	15.39%	14.93%	15.01%
6b	Tier 1 ratio considering unfloored TREA (%)	14.14%	15.38%	15.39%	14.93%	15.01%
7	Total capital ratio (%)	15.96%	17.37%	17.54%	15.92%	16.12%
7b	Total capital ratio considering unfloored TREA (%)	15.96%	17.37%	17.54%	15.92%	16.12%
	<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>					
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%
	<b>Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)</b>					
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%	1.02%	1.01%	0.08%	0.08%
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%	4.02%	4.01%	3.08%	3.08%
EU-11a	Overall capital requirements (%)	12.02%	12.02%	12.01%	11.08%	11.08%
12	CET1 available after meeting the total SREP own funds requirements (%)	7.96%	9.37%	9.39%	7.92%	8.12%
	<b>Leverage ratio</b>					
13	Total exposure measure	316 511 631	306 117 076	285 241 160	279 808 594	264 039 199
14	Leverage ratio (%)	6.07%	6.38%	6.53%	6.35%	6.39%
	<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>					
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%
	<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>					
EU-14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU-14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	<b>Liquidity Coverage Ratio (PLN millions)</b>					
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	104 620	98 299	94 117	91 867	89 097
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17	Liquidity coverage ratio (%)	235%	230%	228%	227%	225%
	<b>Net Stable Funding Ratio (PLN millions)</b>					
18	Total available stable funding	222 518	216 134	200 396	196 031	188 395
19	Total required stable funding	126 937	123 673	124 367	121 514	118 135
20	NSFR ratio (%)	175%	175%	161%	161%	159%

## 4. Capital requirement

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

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

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

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

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

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

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

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

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

On March 24, 2022, mBank concluded a synthetic securitization transaction carried out on a portfolio of corporate loans with a total value of PLN 8 922 million. As part of this transaction, mBank transferred a significant part to the investor credit risk from the selected securitization portfolio. As of 31 December 2025 a selected portfolio of the securitized loans remained on the Bank's balance sheet. The risk of a securitized portfolio was transferred through a recognized credit protection instrument in the form of a credit linked note. The transaction met the requirements set out in the CRR Regulation regarding the transfer of a significant part of the risk and was 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). In January 2026, the transaction was closed (exercise of the call option) and, from that date, it is no longer included in the calculation of RWA.

On 23 December 2022, mBank 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, mBank concluded a synthetic securitization transaction referencing a portfolio of retail non-mortgages loans with a total value of PLN 9 963 million. As part of the transaction, the Bank transferred a significant part of the credit risk of a selected securitized portfolio to an investor. The risk transfer of the securitized portfolio is performed through a recognized credit protection instrument, in the form of a credit linked notes. The transaction meets the requirements for significant risk transfer specified in the CRR Regulation and has been structured as meeting the STS criteria (simple, transparent and standardized) in accordance with Regulation 2021/557. Retained securitization positions are subject to the calculation of capital requirements in accordance with the securitization approach based on internal ratings (SEC-IRBA).

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

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

On 21 October 2025, mBank 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).

On 15 January 2026, mBank obtained approval from the ECB and the KNF to implement a significant change to the definition of default covering all credit portfolios and all entities of mBank Group. The main change in the definition of default applied within the mBank Group, representing the implementation of the KNF and ECB recommendation of April 27, 2021, consisted in taking into account exposures from all entities belonging to the mBank S.A. Group when determining the client's days past due. The change was implemented and has been effective since February 2026.

In the calculation of the total capital ratio of mBank Group as of 31 March 2026, when calculating the total capital charge, the mBank Group applies the IRB approach pursuant to the provisions of the CRR Regulation to calculate a capital charge for credit and counterparty credit risk and pursuant to obtained IRB approvals.

## 4.2 Results of the internal capital adequacy assessment

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

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

Capital adequacy is monitored:

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

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

In the first quarter of 2026, mBank calculated the economic capital at the 99.90% confidence level over a one-year time horizon for credit, market and business risk. The economic capital for operational risk was calculated based on the Standardised Measurement Approach (SMA). In calculating total internal capital, the Bank did not take into account the effect of diversification between different types of risk.

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

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

In order to assess the capital adequacy under economic perspective mBank calculates risk coverage potential (RCP), i.e. economic own funds, in addition to regulatory own funds. Having estimated internal capital as well as RCP both under normal and under stressed conditions Bank determines risk bearing

capacity. On this basis and taking into account the forecast values limits for economic capital for particular risks are determined.

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

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

### 4.3 Supervisory requirements regarding capital ratios

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

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

As of 31 March 2026 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 March 2026 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.

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 March 2026 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 March 2026 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

		31.03.2026
1	Total risk exposure amount	135 902 445
2	Institution specific countercyclical capital buffer rate	1.0154%
3	Institution specific countercyclical capital buffer requirement	1 379 918

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 March 2026.

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 March 2026.

Consequently, the combined buffer requirement set for the mBank Group as of the 31 March 2026 amounted to 4.02% of the total risk exposure amount.

Capital ratios both on consolidated and individual basis as of the 31 March 2026 were above the required values.

With a surplus mBank Group meets the combined buffer requirement.

### 4.4 Quantitative data regarding capital adequacy

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

Total risk exposure amount of mBank Group consists of:

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

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

### EU OV1 - Overview of RWAs

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		31.03.2026	31.12.2025	31.03.2025
<b>1</b>	<b>Credit risk (excluding CCR)</b>	<b>103 741 307</b>	<b>95 872 909</b>	<b>8 299 305</b>
2	Of which the standardised approach	30 087 642	29 601 556	2 407 011
3	Of which the Foundation IRB (F-IRB) approach	4 739 941	2 108 803	379 195
4	Of which slotting approach	6 289 707	6 352 046	503 177
EU 4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	62 624 016	57 810 505	5 009 921
<b>6</b>	<b>Counterparty credit risk - CCR</b>	<b>2 363 087</b>	<b>1 426 966</b>	<b>189 047</b>
7	Of which the standardised approach	2 106 702	1 276 975	168 536
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	5 996	4 977	480
9	Of which other CCR	250 389	145 014	20 031
<b>10</b>	<b>Credit valuation adjustments risk - CVA risk</b>	<b>419 099</b>	<b>275 667</b>	<b>33 528</b>
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	419 099	275 667	33 528
EU 10c	Of which the simplified approach	-	-	-
<b>15</b>	<b>Settlement risk</b>	-	-	-
<b>16</b>	<b>Securitisation exposures in the non-trading book (after the cap)</b>	<b>4 968 565</b>	<b>5 082 919</b>	<b>397 485</b>
17	Of which SEC-IRBA approach	4 508 444	4 590 211	360 675
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	460 121	492 708	36 810
EU 19a	Of which 1250% / deduction	-	-	-
<b>20</b>	<b>Position, foreign exchange and commodities risks (Market risk)</b>	<b>1 220 053</b>	<b>1 036 319</b>	<b>97 604</b>
21	Of which the Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S-SA)	1 220 053	1 036 319	97 604
22	Of which Alternative Internal Model Approach (A-IMA)	-	-	-
<b>EU 22a</b>	<b>Large exposures</b>	-	-	-
<b>23</b>	<b>Reclassifications between the trading and non-trading books</b>	-	-	-
<b>24</b>	<b>Operational risk</b>	<b>23 190 335</b>	<b>23 190 335</b>	<b>1 855 227</b>
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	4 086 555	3 954 845	326 924
26	Output floor applied (%)	55%	50%	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
<b>29</b>	<b>Total</b>	<b>135 902 445</b>	<b>126 885 115</b>	<b>10 872 196</b>

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)	73 653 665	30 087 642	103 741 307	113 120 786	111 102 426
2	Counterparty credit risk	1 367 855	995 232	2 363 087	2 494 035	2 494 035
3	Credit valuation adjustment		419 099	419 099	419 099	419 099
4	Securitisation exposures in the banking book	4 508 444	460 121	4 968 565	3 709 291	1 931 201
5	Market risk	-	1 220 053	1 220 053	1 220 053	1 220 053
6	Operational risk		23 190 335	23 190 335	23 190 335	23 190 335
7	Other risk weighted exposure amounts		-	-	-	-
8	<b>Total</b>	<b>70 666 230</b>	<b>50 464 590</b>	<b>121 130 820</b>	<b>130 811 306</b>	<b>128 331 461</b>

**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	-	15 205	3 731 503	3 746 708	3 746 708
EU 1a	Regional governments or local authorities	-	-	8 642	8 642	8 642
EU 1b	Public sector entities	-	15	1 216	1 231	1 231
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	730 647	1 353 487	1 115 971	1 738 811	1 738 811
3	Equity	-	-	1 114 245	1 114 245	1 114 245
5	Corporates	38 944 780	23 964 252	52 112 741	39 150 572	37 132 212
5.1	Of which: F-IRB is applied	4 009 294	4 378 806	4 009 294	5 251 420	4 378 806
5.2	Of which: A-IRB is applied	34 935 486	19 585 446	34 935 486	20 731 192	19 585 446
EU 5a	Of which: Corporates - General	32 701 214	23 964 252	43 572 329	36 853 728	34 835 368
EU 5b	Of which: Corporates - Specialised lending	6 243 567	-	8 540 411	2 296 845	2 296 845
EU 5c	Of which: Corporates - Purchased receivables	-	-	-	-	-
6	Retail	29 146 225	24 880 749	34 446 793	30 181 318	30 181 318
6.1	Of which: Retail - Qualifying revolving	2 972 746	3 458 614	2 972 746	3 458 614	3 458 614
EU 6.1a	Of which: Retail - Purchased receivables	-	-	-	-	-
EU 6.1b	Of which: Retail - Other	21 362 011	10 367 707	21 362 011	15 668 276	21 422 135
6.2	Of which: Retail - Secured by residential real estate	4 811 467	11 054 428	4 811 467	11 054 428	11 054 428
EU 7a	Categorised as secured by immovable properties and ADC exposures in SA	-	23 564 433	5 728 315	29 292 748	29 292 748
EU 7b	Collective investment undertakings (CIU)	-	-	-	-	-
EU 7c	Categorised as exposures in default in SA	-	2 650 711	389 524	3 040 235	3 040 235
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	4 832 013	4 585 932	5 092 357	4 846 276	4 846 276
9	<b>Total</b>	<b>73 653 665</b>	<b>81 014 784</b>	<b>103 741 307</b>	<b>113 120 786</b>	<b>111 102 426</b>

**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
		31.03.2026
<b>1</b>	<b>Risk weighted exposure amount as at the end of the previous reporting period</b>	<b>61 748 195</b>
2	Asset size (+/-)	1 122 418
3	Asset quality (+/-)	711 795
4	Model updates (+/-)	5 148 558
5	Methodology and policy (+/-)	-
6	Acquisitions and disposals (+/-)	-
7	Foreign exchange movements (+/-)	171 989
8	Other (+/-)	1
<b>9</b>	<b>Risk weighted exposure amount as at the end of the reporting period</b>	<b>68 902 956</b>

## 5. Liquidity risk

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

As of March 31, 2026, the LCR of mBank Group reached 241% and the LCR measure remained on a safe level, significantly exceeding 100%.

In 1Q 2026, 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 7.7 billion compared to the end of 4Q 2025 (PLN 6.9 billion excluding FX effects),
- an increase in lending activity by PLN 5.8 billion compared to the end of 4Q 2025 (PLN 5.5 billion excluding FX effects).

An additional factor contributing to the decrease in the LCR ratio was an approximately PLN 1 billion impairment of liquid assets related to the US–Iran conflict.

As of March 31, 2026, 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 March 2026:

- 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 March 31, 2026 accounted for 92.60% of all external sources of financing. The deposit base is diversified, and the deposits of the 10 largest customers as of March 31, 2026 accounted for 2.5% 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 March 31, 2026, the impact of the adverse market scenario on derivatives accounted for 0.24% of the total unweighted outflow value included in the LCR.

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

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	31.03.2026	31.12.2025	30.09.2025	30.06.2025	31.03.2026	31.12.2025	30.09.2025	30.06.2025
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
<b>HIGH-QUALITY LIQUID ASSETS</b>									
1	Total high-quality liquid assets (HQLA)					104 620	98 299	94 117	91 867
<b>CASH - OUTFLOWS</b>									
2	Retail deposits and deposits from small business customers, of which:	152 089	146 070	141 576	138 271	11 862	11 117	10 560	10 286
3	Stable deposits	107 346	105 135	103 288	100 450	5 367	5 257	5 164	5 022
4	Less stable deposits	44 743	40 935	38 288	37 821	6 495	5 860	5 396	5 264
5	Unsecured wholesale funding	63 299	60 842	59 019	57 599	28 297	27 164	26 298	25 450
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	8 636	8 425	8 176	8 183	2 072	2 020	1 959	1 961
7	Non-operational deposits (all counterparties)	54 357	52 024	50 412	49 172	25 919	24 750	23 908	23 245
8	Unsecured debt	306	393	431	244	306	393	431	244
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	34 632	33 041	30 277	27 878	4 171	4 131	4 121	4 175
11	Outflows related to derivative exposures and other collateral requirements	1 382	1 432	1 539	1 654	1 382	1 432	1 539	1 654
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	33 250	31 609	28 738	26 224	2 789	2 699	2 582	2 521
14	Other contractual funding obligations	2 391	2 542	2 426	2 540	2 011	2 163	2 056	2 179
15	Other contingent funding obligations	11 917	12 504	14 682	16 831	1 037	916	860	858
16	TOTAL CASH OUTFLOWS					47 378	45 491	43 895	47 378
<b>CASH - INFLOWS</b>									
17	Secured lending (e.g. reverse repos)	17 545	17 340	16 700	16 412	-	-	-	-
18	Inflows from fully performing exposures	3 236	3 271	2 982	2 909	2 260	2 270	1 981	1 908
19	Other cash inflows	597	581	625	650	597	581	625	649
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	21 378	21 193	20 307	19 971	2 857	2 852	2 606	2 557
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	21 378	21 193	20 307	19 971	2 857	2 852	2 606	2 557
<b>TOTAL ADJUSTED VALUE</b>									
EU-21	LIQUIDITY BUFFER					104 620	98 299	94 117	91 867
22	TOTAL NET CASH OUTFLOWS					44 521	42 639	41 289	40 391
23	LIQUIDITY COVERAGE RATIO					235%	230%	228%	227%

**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 March 2026" were prepared in accordance with the formal policies and internal processes, as well as, systems and controls agreed upon at the Management Board level, and give a true view of the facts. Furthermore, the risk management arrangements are adequate and give assurance that the risk management systems in use are appropriate in terms of the risk profile and strategy of the mBank Group.

The Management Board of mBank S.A. approves this "Disclosures regarding capital adequacy of mBank S.A. Group as at 31 March 2026".

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)