Disclosures regarding capital adequacy of mBank S.A. Group as at 30 September 2026



Warsaw, 3rd November 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. 30 September 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.

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, minor mathematical inconsistencies may occur in totals and subtotals due to rounding.

2. Scope of prudential consolidation

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

In the prudential consolidation process, the same accounting principles were applied as those used in preparing the mBank S.A. Group Consolidated Financial Report for the third quarter of 2026, which includes Condensed Consolidated Financial Statements of mBank S.A. Group for the third 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 30 September 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 30 September 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 third 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 third 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 in the third quarter of 2026, compared with the level as at 30 June 2026, was mainly driven by an increase in eligible profit. A positive impact also resulted from changes in the value of adjustments due to prudential filters. These changes were largely offset by a decrease in Tier 2 capital, a reduction in accumulated other comprehensive income, an increase in other deductions from CET1 capital, and a widening of the shortfall of credit risk adjustments to expected losses 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
		30.09.2026	30.06.2026	31.03.2026	31.12.2025	30.09.2025
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	18 623 318	18 240 382	17 712 477	16 717 713	16 094 337
2	Tier 1 capital	20 123 318	19 740 382	19 212 477	18 217 713	17 594 337
3	Total capital	22 357 353	22 165 626	21 687 744	20 738 610	20 208 513
Risk-weighted exposure amounts						
4	Total risk exposure amount	146 079 326	144 809 417	135 902 445	126 885 115	121 130 820
4a	Total risk exposure pre-floor	146 079 326	144 809 417	135 902 445	126 885 115	121 130 820
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	12.75%	12.60%	13.03%	13.18%	13.29%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	12.75%	12.60%	13.03%	13.18%	13.29%
6	Tier 1 ratio (%)	13.78%	13.63%	14.14%	14.36%	14.53%
6b	Tier 1 ratio considering unfloored TREA (%)	13.78%	13.63%	14.14%	14.36%	14.53%
7	Total capital ratio (%)	15.30%	15.31%	15.96%	16.34%	16.68%
7b	Total capital ratio considering unfloored TREA (%)	15.30%	15.31%	15.96%	16.34%	16.68%
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 (%)	1.95%	1.02%	1.02%	1.02%	1.01%
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 (%)	4.95%	4.02%	4.02%	4.02%	4.01%
EU-11a	Overall capital requirements (%)	12.95%	12.02%	12.02%	12.02%	12.01%
12	CET1 available after meeting the total SREP own funds requirements (%)	7.30%	7.31%	7.96%	8.34%	8.53%
Leverage ratio						
13	Total exposure measure	334 354 057	333 281 718	316 511 631	306 117 076	285 241 160
14	Leverage ratio (%)	6.02%	5.92%	6.07%	5.95%	6.17%
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 (PLN millions)						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	116 586	111 205	104 620	98 299	94 117
EU-16a	Cash outflows - Total weighted value	54 056	50 358	47 378	45 491	43 895
EU-16b	Cash inflows - Total weighted value	4 400	3 428	2 857	2 852	2 606
16	Total net cash outflows (adjusted value)	49 656	46 930	44 521	42 639	41 289
17	Liquidity coverage ratio (%)	235%	237%	235%	230%	228%
Net Stable Funding Ratio (PLN millions)						
18	Total available stable funding	236 039	232 705	222 518	215 093	200 542
19	Total required stable funding	143 683	136 020	126 937	123 673	124 367
20	NSFR ratio (%)	164%	171%	175%	174%	161%

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

		a	b	c	d	e
		30.09.2026	30.06.2026	31.03.2026	31.12.2025	30.09.2025
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	18 623 318	19 118 252	18 481 988	18 017 584	17 137 918
2	Tier 1 capital	20 123 318	20 618 252	19 981 988	19 517 584	18 637 918
3	Total capital	22 357 353	23 043 496	22 457 255	22 038 481	21 252 094
Risk-weighted exposure amounts						
4	Total risk exposure amount	146 079 326	144 809 417	135 902 445	126 885 115	121 130 820
4a	Total risk exposure pre-floor	146 079 326	144 809 417	135 902 445	126 885 115	121 130 820
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	12.75%	13.20%	13.60%	14.20%	14.15%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	12.75%	13.20%	13.60%	14.20%	14.15%
6	Tier 1 ratio (%)	13.78%	14.24%	14.70%	15.38%	15.39%
6b	Tier 1 ratio considering unfloored TREA (%)	13.78%	14.24%	14.70%	15.38%	15.39%
7	Total capital ratio (%)	15.30%	15.91%	16.52%	17.37%	17.54%
7b	Total capital ratio considering unfloored TREA (%)	15.30%	15.91%	16.52%	17.37%	17.54%
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 (%)	1.95%	1.02%	1.02%	1.02%	1.01%
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%
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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 (PLN millions)						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	116 586	111 205	104 620	98 299	94 117
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17	Liquidity coverage ratio (%)	235%	237%	235%	230%	228%
Net Stable Funding Ratio (PLN millions)						
18	Total available stable funding	236 039	233 448	223 183	216 134	200 396
19	Total required stable funding	143 683	136 020	126 937	123 673	124 367
20	NSFR ratio (%)	164%	172%	176%	175%	161%

4. Capital requirements

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 Sp. z o.o. (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 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 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-mortgage 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 the investors. The risk transfer of the securitized portfolio is performed through a recognized credit protection instrument, in the form of 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 ECB and 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 6 November 2024, mBank concluded a synthetic securitization transaction executed on a portfolio of corporate loans with a total notional 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 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 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 Standardised Approach for Securitisation (SEC-SA).

On 15 January 2026, mBank obtained approval from the ECB and PFSA 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 PFSA 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.

On 6 August 2026, mBank concluded a synthetic securitization transaction executed on a portfolio of corporate loans secured by commercial real estate (CRE) in Poland, with a total value of EUR 1 132 million as at 29 May 2026. As part of the transaction, the Bank transferred a significant part of the credit risk of the securitized portfolio to an investor. The risk transfer of the securitized portfolio is performed through a credit protection instrument in the form of 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).

In the calculation of the total capital ratio of mBank Group as of 30 September 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 third 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; it monitors the capital position of the Group and the Bank on an ongoing basis. The main principles of the internal capital adequacy assessment process (ICAAP) are approved by the Supervisory Board of mBank. The whole internal capital adequacy assessment process is reviewed annually. The results of the annual review are reported in a dedicated report which is approved by the Supervisory Board of mBank.

4.3 Supervisory requirements regarding capital ratios

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

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

As of 30 September 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.

Starting from September 2026 the countercyclical capital buffer rate set for relevant exposures in Poland amounted to 2% in accordance with the Regulation of the Minister of Finance dated 29 September 2025 on the countercyclical buffer rate. Until September 2026, this rate amounted to 1%, in accordance with the Regulation of the Minister of Finance of 18 September 2024.

Countercyclical capital buffer is calculated in accordance with the provisions of the Act as the weighted average of the countercyclical buffer rates that apply in the countries where the relevant credit exposures of the mBank Group are located. As at the end of September 2026 this ratio amounted to 1.95%.

In addition to exposures located in Poland, exposures of foreign branches in Czech Republic and in Slovakia, where countercyclical buffer rates as of 30 September 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

		30.09.2026
1	Total risk exposure amount	146 079 326
2	Institution specific countercyclical capital buffer rate	1.9492%
3	Institution specific countercyclical capital buffer requirement	2 847 349

In 2016 mBank 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 30 September 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 30 September 2026.

Consequently, the combined buffer requirement set for the mBank Group as of 30 September 2026 amounted to 4.95% of the total risk exposure amount.

Capital ratios both on consolidated and individual basis as of 30 September 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
		30.09.2026	30.06.2026	30.09.2026
1	**Credit risk (excluding CCR)**	**113 848 406**	**112 025 779**	**9 107 873**
2	Of which the standardised approach	33 248 328	31 846 468	2 659 866
3	Of which the Foundation IRB (F-IRB) approach	8 471 271	8 205 892	677 702
4	Of which slotting approach	3 464 187	6 412 675	277 135
EU 4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	68 664 620	65 560 744	5 493 170
6	**Counterparty credit risk - CCR**	**2 635 073**	**2 939 962**	**210 806**
7	Of which the standardised approach	-	2 314 769	-
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	-	323 314	-
9	Of which other CCR	2 635 073	301 879	210 806
10	**Credit valuation adjustments risk - CVA risk**	**436 819**	**490 527**	**34 946**
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	436 819	490 527	34 946
EU 10c	Of which the simplified approach	-	-	-
15	**Settlement risk**	-	**-**	-
16	**Securitisation exposures in the non-trading book (after the cap)**	**4 095 405**	**4 503 103**	**327 632**
17	Of which SEC-IRBA approach	3 694 465	3 809 619	295 557
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	400 940	693 484	32 075
EU 19a	Of which 1250% / deduction	-	-	-
20	**Position. foreign exchange and commodities risks (Market risk)**	**1 873 287**	**1 659 710**	**149 863**
21	Of which the Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S-SA)	1 873 287	1 659 710	149 863
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**	**23 190 335**	**1 855 227**
EU 24a	Exposures to crypto-assets	**-**	**-**	**-**
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	3 535 513	3 319 836	282 841
26	Output floor applied (%)	55%	55%	
27	Floor adjustment (before application of transitional cap)	**-**	-	
28	Floor adjustment (after application of transitional cap)	**-**	-	
29	**Total**	**146 079 326**	**144 809 417**	**11 686 346**

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)	80 600 078	33 248 328	113 848 406	122 714 336	120 622 898
2	Counterparty credit risk	1 166 113	1 468 961	2 635 073	2 828 967	2 828 967
3	Credit valuation adjustment		436 819	436 819	436 819	436 819
4	Securitisation exposures in the banking book	3 694 465	400 940	4 095 405	5 666 061	2 733 946
5	Market risk	-	1 873 287	1 873 287	1 873 287	1 873 287
6	Operational risk		23 190 335	23 190 335	23 190 335	23 190 335
7	Other risk weighted exposure amounts		-	-	-	-
8	**Total**	**85 460 656**	**60 618 670**	**146 079 326**	**156 709 804**	**151 686 251**

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	-	16 695	3 093 316	3 110 011	3 110 011
EU 1a	Regional governments or local authorities	-	-	4 937	4 937	4 937
EU 1b	Public sector entities	-	18	9 996	10 014	10 014
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	1 469 290	1 573 242	1 640 330	1 744 283	1 744 283
3	Equity	-	-	1 096 844	1 096 844	1 096 844
5	Corporates	42 003 130	24 364 456	57 401 757	41 854 521	39 763 083
5.1	Of which: F-IRB is applied	7 001 981	6 865 793	7 001 981	7 928 657	6 865 793
5.2	Of which: A-IRB is applied	35 001 149	17 498 663	35 001 149	18 527 237	17 498 663
EU 5a	Of which: Corporates - General	38 573 392	24 364 456	51 621 080	39 503 582	37 412 144
EU 5b	Of which: Corporates - Specialised lending	3 429 738	-	5 780 677	2 350 939	2 350 939
EU 5c	Of which: Corporates - Purchased receivables	-	-	-	-	-
6	Retail	32 318 842	29 148 307	38 978 819	35 808 284	35 808 284
6.1	Of which: Retail - Qualifying revolving	2 917 879	3 497 925	2 917 879	3 497 925	3 497 925
EU 6.1a	Of which: Retail - Purchased receivables	-	-	-	-	-
EU 6.1b	Of which: Retail - Other	23 995 827	13 353 687	23 995 827	20 013 664	25 650 382
6.2	Of which: Retail - Secured by residential real estate	5 405 137	12 296 695	5 405 137	12 296 695	12 296 695
EU 7a	Categorised as secured by immovable properties and ADC exposures in SA	-	25 642 836	6 092 350	31 735 186	31 735 186
EU 7b	Collective investment undertakings (CIU)	-	-	-	-	-
EU 7c	Categorised as exposures in default in SA	-	2 135 441	488 379	2 623 820	2 623 820
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	4 808 816	4 493 574	5 041 679	4 726 436	4 726 436
9	**Total**	**80 600 078**	**87 374 570**	**113 848 406**	**122 714 336**	**120 622 898**

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

		Risk weighted exposure amount
		30.09.2026
1	**Risk weighted exposure amount as at the end of the previous reporting period**	**75 179 970**
2	Asset size (+/-)	1 685 571
3	Asset quality (+/-)	(1 230 304)
4	Model updates (+/-)	-
5	Methodology and policy (+/-)	-
6	Acquisitions and disposals (+/-)	-
7	Foreign exchange movements (+/-)	205 905
8	Other (+/-)	2 030
9	**Risk weighted exposure amount as at the end of the reporting period**	**75 843 171**

5. Liquidity risk

The table below addresses the scope of disclosures from EU LIQB table. As of September 30, 2026, the LCR of mBank Group reached 215% and the LCR measure remained on a safe level, significantly exceeding 100%. In 3Q 2026, the slight decrease in the net outflow coverage ratio were primarily driven by:

- an increase in the deposit base included in the LCR calculation by PLN 5.3 billion compared with June 30, 2026 (PLN 4.5 billion excluding FX effects),
- acceleration in lending activity - PLN 12.1 billion compared with June 30, 2026 (PLN 11.7 billion excluding FX effects).

An additional factor affecting the mBank Group's LCR ratio in the third quarter of 2026 was the management of wholesale funding. Under the EMTN programme, mBank carried out early redemptions of bonds with a total nominal value of EUR 0.75 billion, including the redemption of EUR 0.5 billion settled on 11 September 2026 and EUR 0.25 billion settled on 21 September 2026. At the same time, on 29 September 2026, an AT1 instrument with a nominal value of EUR 0.25 billion was issued. These transactions were undertaken as part of capital management activities and MREL, including the management of the liability maturity profile and the reduction of concentrations of future debt instrument maturities.

As of September 30, 2026, the liquidity buffer remained high relative to expected net outflows over a 30-day horizon.

The high-quality liquid assets in the liquidity buffer (HQLA) used to calculate the LCR ratio consisted exclusively of Level 1 assets and included at the end of September 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 September 30, 2026 accounted for 92.8% of all external sources of financing. The deposit base is diversified, and the deposits of the 10 largest customers as of September 30, 2026 accounted for 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 activities of the foreign branches in the Czech Republic and Slovakia. The currency mismatch is limited at the level of the adjusted liquidity gap in individual currencies.

As of September 30, 2026, the impact of the adverse market scenario on derivatives accounted for 0.29% of the total unweighted outflow value included in the LCR.

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

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	30.09.2026	30.06.2026	31.03.2026	31.12.2025	30.09.2026	30.06.2026	31.03.2026	31.12.2025
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)					116 586	111 205	104 620	98 299
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers. of which:	165 916	158 848	152 089	146 070	13 516	12 722	11 862	11 117
3	*Stable deposits*	*111 588*	*109 261*	*107 346*	*105 135*	*5 579*	*5 463*	*5 367*	*5 257*
4	*Less stable deposits*	*54 328*	*49 587*	*44 743*	*40 935*	*7 937*	*7 259*	*6 495*	*5 860*
5	Unsecured wholesale funding	70 192	66 623	63 299	60 842	32 290	30 188	28 297	27 164
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	*9 096*	*8 856*	*8 636*	*8 425*	*2 187*	*2 127*	*2 072*	*2 020*
7	*Non-operational deposits (all counterparties)*	*60 308*	*57 228*	*54 357*	*52 024*	*29 314*	*27 523*	*25 919*	*24 750*
8	*Unsecured debt*	*788*	*539*	*306*	*393*	*788*	*539*	*306*	*393*
9	*Secured wholesale funding*					-	-	-	-
10	Additional requirements	37 700	35 968	34 632	33 041	4 573	4 265	4 171	4 131
11	*Outflows related to derivative exposures and other collateral requirements*	*1 409*	*1 338*	*1 382*	*1 432*	*1 409*	*1 338*	*1 382*	*1 432*
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	*36 291*	*34 630*	*33 250*	*31 609*	*3 164*	*2 928*	*2 789*	*2 699*
14	Other contractual funding obligations	2 398	2 250	2 391	2 542	1 999	1 864	2 011	2 163
15	Other contingent funding obligations	12 952	12 311	11 917	12 504	1 678	1 319	1 037	916
16	TOTAL CASH OUTFLOWS					54 056	50 358	47 378	45 491
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	20 342	18 601	17 545	17 340	-	-	-	-
18	Inflows from fully performing exposures	5 096	3 953	3 236	3 271	3 695	2 814	2 260	2 270
19	Other cash inflows	705	614	597	581	705	614	597	581
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	26 143	23 167	21 378	21 193	4 400	3 428	2 857	2 852
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-
EU-20b	*Inflows subject to 90% cap*	-	-	-	-	-	-	-	-
EU-20c	*Inflows subject to 75% cap*	26 143	23 167	21 378	21 193	4 400	3 428	2 857	2 852
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					116 586	111 205	104 620	98 299
22	TOTAL NET CASH OUTFLOWS					49 656	46 930	44 521	42 639
23	LIQUIDITY COVERAGE RATIO					235%	237%	235%	230%

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 these "Disclosures regarding capital adequacy of mBank S.A. Group as at 30 September 2026" has been prepared in accordance with the formal policies, internal procedures, systems and controls approved at Management Board level and accurately reflects the actual state of affairs. Furthermore, the risk-management arrangements are adequate and provide assurance that the risk-management systems in place are appropriate in view of the risk profile and strategy of the mBank Group.

The Management Board of mBank S.A. approves this "Disclosures regarding capital adequacy of mBank S.A. Group as at 30 September 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)*
Julia Nusser	Vice-President of the Management Board, Chief People & Regulatory Officer	*(signed electronically)*
Adam Pers	Vice-President of the Management Board, Head of Corporate & Investment Banking	*(signed electronically)*
Pascal Ruhland	Vice-President of the Management Board, Chief Financial Officer	*(signed electronically)*