Consolidated sustainability statement of Santander Bank Polska Group for 2024

Santander

Contents

Basis for preparation 4
General basis for preparation of the sustainability statement (BP-1) 4
Disclosures in relation to specific circumstances (BP-2) 5

1. General Disclosures (Sustainability of the Group) 7
1.1. Impact, risk and opportunity management 7
Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1) 7
Description of the processes to identify and assess climate-related material impacts, risks and opportunities (E1.IRO-1) 12
1.2. Sustainability Strategy of the Group 14
Strategy, business model and value chain (SBM-1) 14
Interests and views of stakeholders (SBM-2) 18
Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) 19
1.3. Governance 27
The Role of the Management Board and the Supervisory Board (GOV-1) 27
Risk management and internal controls over sustainability reporting (GOV-5) 33

2. Environmental information – climate change (ESRS E1) 35
2.1. Strategy 35
Transition plan for climate change mitigation (E1-1) 35
2.2. Policies related to climate change mitigation and adaptation (E1-2) 37
Significant impacts, risks and opportunities related to climate change mitigation and adaptation 37
Policies on management of impacts, risks and opportunities related to climate change mitigation and adaptation (MDR-P) 37
2.3. Actions and resources in relation to climate change policies (E1-3) 38
2.4. Metrics and targets 42
Targets related to climate change mitigation and adaptation (E1-4) 42
Energy consumption and mix (E1-5) 43
Gross Scopes 1, 2 and 3 and Total GHG emissions (E1-6) 43
Other climate-related disclosures (E1-7, E1-8, E1-9) 47
Disclosures under Regulation no. 2020/852 47

3. Social information 80
3.1. Our People – own workforce (ESRS S1) 80
3.1.1 Impacts, risks and opportunity management 80
Policies related to own workforce (S1-1) 80
Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3) 85
Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4) (MDR-A) 86
3.1.2 Metrics and targets 87
Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5) 87
Characteristics of employees (S1- 6) 88
Characteristics of non-employees in the Group's own workforce (S1-7) 90
Collective bargaining coverage and social dialogue (S1-8) 90
Diversity metrics (S1-9) 91
Training and Skills Development metrics (S1-13) 92
Health and safety metrics (S1-14) 93
Work-life balance metrics (S-15) 93
Compensation metrics (pay gap and total compensation) (S1-16) 94
Incidents, complaints and severe human rights impacts (S1-17) 94
3.2. Our customers – consumers and end-users (ESRS S4) 95

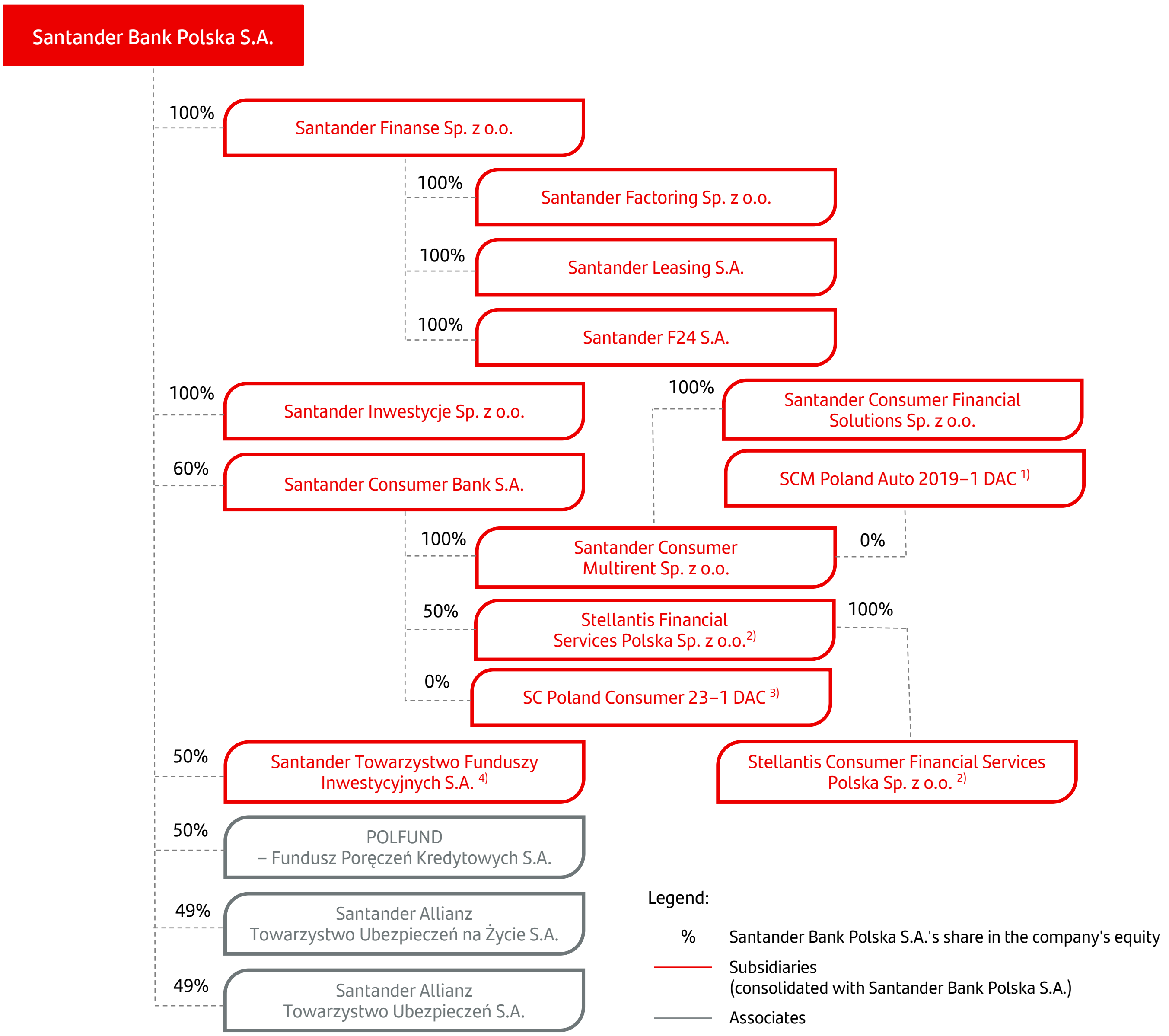
3.2.1 Impact, risk and opportunity management 95
Policies related to consumers and end-users (S4-1) 95
Actions on significant impacts on consumers and end-users and applying approaches to manage significant risks and opportunities related to consumers and end-users, and the effectiveness of these actions (S4-4) (MDR-A) 97
Processes for engaging with consumers and end-users about impacts (S4-2) 102
Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3) 103
3.2.2 Metrics and targets 104
Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5) 104
3.3. Affected communities 104
3.3.1 Impact, risk and opportunity management 104
Policies related to affected communities (S3-1) 104
Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions (S3-4) (MDR-A) 106
Processes for engaging with affected communities about impacts (S3-2) 108
Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3) 108
3.3.2 Metrics and targets 109
Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5) 109
4. Governance information – Business conduct (G1) 111
4.1. Governance 111
Business conduct policies and corporate culture (G1-1) 111
Prevention and detection of corruption and bribery (G1-3) 116
4.2. Measures and targets 118
Business conduct targets (MDR-T) 118
Incidents of corruption or bribery (G1-4) 118
5. Additional information 120
ESRS disclosure requirements covered by the entity's sustainability statement (IRO-2) 120

Basis for preparation

General basis for preparation of the sustainability statement (BP-1)

In accordance with the Accounting Act of September 29, 1994, Journal of Laws 1994 No. 121, item 591, as amended (hereinafter referred to as "Accounting Act") and the Directive of the European Parliament and of the Council (EU) 2022/2464[1] (known as the CSRD) on corporate sustainability reporting, the Santander Bank Polska Group (hereinafter: "the Group") has prepared its first Consolidated Sustainability Statement (hereinafter: "the sustainability statement" or "statement"). This statement has been developed in compliance with the European Sustainability Reporting Standards (hereinafter: "ESRS"[2]). We have incorporated the double materiality perspective and taken into account material impacts, risks, and opportunities related to environmental, social, and governance (ESG) matters. The reporting scope aligns with the consolidation scope applied in the Consolidated Financial Statements of the Santander Bank Polska Group for 2024.

The Group includes:



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1 *Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC, and Directive 2013/34/EU as regards corporate sustainability reporting.*

2 *Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards.*

If the statement refers to the Bank, it shall be understood as Santander Bank Polska S.A. If the statement refers to Santander Consumer Bank, it shall be understood as Santander Consumer Bank S.A. and its subsidiaries Santander Consumer Multirent Sp. z o.o. and Santander Consumer Financial Solutions Sp. z o.o. If the statement refers to Santander Leasing, it shall be understood as Santander Leasing S.A., Santander Finanse Sp. z o.o., and Santander F24 S.A.

Santander Consumer Bank Polska S.A. is a subsidiary of the Bank that is exempt from its own consolidated sustainability reporting based on Article 63u(1) of the Accounting Act.

The information contained in this sustainability statement takes into account material impacts, risks, and opportunities across the entire value chain, both upstream and downstream, arising from the business relationships of the Group, including its suppliers, partners, and customers.

To define the value chain, we referred to the guidelines set out in the CSRD, ESRS, and the supplementary ESRS "Implementation Guidance on the Value Chain" developed by European Financial Reporting Advisory Group (EFRAG). The value chain analysis, conducted as part of the double materiality assessment process, covered both the direct operations of the Bank and the Group as well as indirect impacts stemming from the activities of our partners at all stages of the supply chain and in relationships with customers (for more details on the value chain, see section “Strategy, business model and value chain” of this statement).

Since there was no such a necessity, for the purpose of disclosures in the Statement, the Group has not availed itself of the possibility to omit detailed information on intellectual property, know-how, and the results of innovation, as provided for in ESRS 1. Furthermore, we have not exercised the exemption from disclosing information on upcoming events or negotiations.

The publication covers the period from 1 January 2024 to 31 December 2024 and the information and indicators refer to the Group, unless otherwise specified in the text.

Disclosures in relation to specific circumstances (BP-2)

Time Horizons

The time horizons for impacts, risks, and opportunities that reflect the expected effects on stakeholders and the environment, or the anticipated financial effects, are identified in accordance with ESRS 1 as follows:

- Short-term time horizon: a period of one year, corresponding to the reporting period of the financial statements.
- Medium-term time horizon: a period from one to five years. This time horizon focuses on achieving strategic operational and financial objectives, considering material sustainability-related risks and opportunities.
- Long-term time horizon: a period beyond five years. This horizon encompasses our long-term commitments and aspirations related to sustainability, including goals associated with energy transition, innovation, and social and environmental impacts.

Metrics based on estimates or characterised by high levels of uncertainty

The majority of metrics used in our reporting are based on actual data obtained from direct sources. In cases where full actual data is not available, estimates are applied to ensure the continuity and completeness of the reported information. These estimates are based on best industry methods and practices to reflect actual data as accurately as possible.

The following indicators are determined using estimation methods due to the lack of complete actual data:

- Electricity consumption: Estimates are applied for certain locations, such as Santander zones, offsite locations, and selected ATMs, where individual energy consumption data is unavailable.
- Thermal energy: Thermal energy consumption is estimated for locations without direct measurements, using available cost data and average unit prices.
- Electricity and thermal energy consumption in the final quarter of the reporting period: Estimates are used due to the lack of invoices confirming actual consumption, resulting from the timing of invoice issuance and delivery by energy providers. These estimates are based on consumption during the same period in the previous reporting year.
- Greenhouse gases emissions ("GHG") linked to client activities: Most Scope 3 emissions are calculated using the Partnership for Carbon Accounting Financials (PCAF) methodology and are based on estimates, as access to actual data from clients is limited.
- Employee commuting (Scope 3): Emissions data related to employee commuting is estimated based on survey results, which account for the modes of transport employees use for commuting.

- Business travel (Scope 3): Emission metrics for business travel include both actual data (when available) and estimates, particularly for rail and bus travel, where average distances are applied.
- Number of beneficiaries of social initiatives: For social initiatives supported by multiple organizations (partners), the estimated number of beneficiaries attributable to the Group is proportional to our financial contribution to the initiative's total budget. In the lack of tools to calculate the exact number of beneficiaries of an initiatives, a 30% cap is applied due to potential double counting of beneficiaries.

Detailed information on the methodology for determining the above indicators and the estimation methods applied is presented in the relevant sub-sections. To improve the accuracy of metrics based on indirect data, we undertake ongoing efforts to enhance data quality. We engage in dialogue with clients and other stakeholders to obtain more comprehensive actual data and to gradually reduce reliance on estimates. At the same time, we refine estimation methods by applying available methodologies. We systematically verify data from external entities, cross-check it with invoices and accounting records, and analyze deviations from historical data. This allows us to identify and correct inaccuracies on an ongoing basis.

For the assessment of negative and positive impacts, risks and opportunities, as well as the applied measurement of indicators related to the financing of specific client groups, more detailed information can be expected in the future. This takes into account, among other factors, that clients will provide data in their sustainability reports, and that EFRAG guidelines and new sectoral standards will be published. As a Group, we are making use of transitional provisions, including in the area of the value chain. The double materiality assessment process and the Statement include forward-looking information. Therefore, assumptions, judgments, forecasts, and projections have been applied regarding, among other things, climate risks, transition risks, and opportunities. As a result, forward-looking information reflects the Group's current expectations and may be subject to uncertainty. It may also change, particularly due to economic developments, regulatory changes, market dynamics, or climate change.

Alignment with the EU Taxonomy

As part of the sustainability statement, in section "Disclosures under Regulation no. 2020/852), we disclose information prepared in accordance with Regulation (EU) 2020/852 of the European Parliament and of the Council (hereinafter: "EU Taxonomy").

Incorporation by reference

In this statement, we refer to matters described in other sections of the Management Board Report or in other documents of the Group. This includes topics such as:

- Detailed information about the experience of Management Board Members, which can be found in Chapter XII "Statement on corporate governance in 2024",
- Information on business segments in terms of customer profiles and product lines, which can be found in Chapter VIII "Business development in 2024".
- Detailed information on actions taken in the area of own workforce can be found in Chapter V "Relations with employees" and Chapter IV "Development strategy". Detailed information on actions taken in the area of consumers and end users can be found in Chapter VI "Relations with customers" and Chapter VIII "Business development in 2024". Detailed information on actions taken in the area of affected communities can be found in Chapter IV "Development strategy".

Application of phased-in disclosure requirements

The table below presents disclosures resulting from the phased-in disclosure requirements. By applying the provisions of the ESRS in this regard, the Group does not disclose the information listed in the table below in this statement.

ESRS	Required Disclosure	Description of Disclosure
ESRS 2	SBM-3, section 48 e)	Potential financial effects
ESRS E1	E1-9	Potential financial effects arising from significant physical and transition risks, as well as climate-related opportunities
ESRS S1	S1-14	Health and safety: Information on non-employees
ESRS 2	SBM-1	Breakdown of total revenue by material ESRS sectors

1. General Disclosures (Sustainability of the Group)

1.1. Impact, risk and opportunity management

Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)

In 2024, we conducted, together with experienced experts from an external consulting firm, a double materiality assessment in accordance with the ESRS and EFRAG guidelines[3]. The purpose of that assessment was to identify the material impacts, risks, and opportunities for the Group arising from sustainability-related issues. Understanding the results of this analysis serves as the foundation for the Group's disclosure of key ESG information. The assessment was carried out taking into account directional methodological assumptions consistent across the Banco Santander Group and included an assessment of:

- the Group's impact on the external environment (impact materiality),
- risks and opportunities affecting the Group (financial materiality).

The double materiality assessment process began with dialogue with key stakeholders, including employees, customers, investors, representatives of non-governmental organizations, regulators, academic institutions and business partners. The analysis was conducted in multiple stages and included both dialogue sessions and survey research.

- Employee survey: An online survey was conducted among employees of the Group between 10-14 June 2024, allowing participants to anonymously share their opinions on material ESG topics.
- Stakeholder dialogue session: A dialogue session with stakeholders of the Group was held on 17 June 2024 via the MS Teams online platform. This was the 12th session dedicated to sustainability and responsible business practices. The session was conducted in accordance with the AA1000SES international standard, with the participation of independent moderators. During the dialogue session, discussions were organized into three thematic groups:
  - Responsible business relationships and their impact on the environment and society,
  - Responsibility for employees and the Bank's social activities,
  - Sustainable financing and relationships with customers.

> Incorporating the opinions of key stakeholders in the double-materiality assessment

	Stakeholder Group	Impact Materiality	Financial Materiality
Stakeholders affected by impacts	Customers	X	
	Non-governmental organizations (NGOs)	X	
	Employees of the Group	X	
Users of reports	Investors/stakeholders (including Banco Santander Group)		X
	Top Management		X
	Regulatory and supervisory bodies	X	X

We also used portfolio analyses in the process. These included an assessment of impacts, risks and opportunities through the Group's portfolio of products and services. The analyses focused particularly on our loan portfolio and served to identify impacts, risks and opportunities, as well as to assess the materiality of identified risks and opportunities. The portfolio analyses used recognised methodologies and analytical tools, as well as solutions developed by the Group. These included:

- UNEP FI Impact Tool, for assessing the impacts, risk and opportunities of financial institutions,
- 'Heat maps' illustrating climate risks (including transition and physical risks), developed using, among others, the TCFD[4] methodology and NGFS[5] climate scenarios,
- Encore tool for assessing environmental risks,
- Bank's sales forecasts on, inter alia, green, social and sustainability-related financing.

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3 *European Financial Reporting Advisory Group*

4 *Task Force on Climate-Related Financial Disclosures created by the Financial Stability Board (FSB).*

5 *Network for Greening the Financial System.*

Stages of the Double Materiality Assessment in the Group

The double materiality analysis serves as the foundation for the Group's strategic approach to sustainability. It enables the Group to:

- Identify key ESG topics that are material from the perspective of stakeholders and the Group's operations,
- Assess risks and opportunities associated with each ESG issue, facilitating effective management,
- Prioritize actions in the area of sustainability.

The analysis process was conducted in four stages:

- **Stage 1:** Contextual Analysis

  In this stage, we defined the assumptions for the analysis and identified the Group's value chain, encompassing stakeholders across upstream operations, our own operations, and downstream operations. The analysis accounted for internal and external factors, such as regulations, stakeholder expectations and market trends. We used external sources mentioned above. We analysed the information gathered during the dialogue session and from the stakeholder survey on sustainability issues to use in the materiality assessment.

- **Stage 2:** Identification of Impacts, Risks and Opportunities (IROs)

  In the second stage, we reviewed sustainability topics in line with ESRS. The contextual analysis initially identified 100 IROs. We categorised them and assigned them to a topic or sub-topic, and key impacts, risks, and opportunities – within ESRS 1, AR 16. We also analysed the Group's portfolio of products and services, with particular focus on the loan portfolio.

  Each IRO was:

  - mapped to the value chain, assigned relationships between impacts and risks, assessing whether and how impacts could lead to new risks and opportunities, with a particular focus on potentially negative human rights impacts,
  - assigned to the responsible unit within the organisation for the process in question,
  - estimated for the potential financial impact resulting from the risks or opportunities.

  The methodology we used to measure materiality is based on EFRAG's guidance on materiality assessment . After applying it at this stage, we classified 32 IROs as material.

- **Stage 3:** Assessment of Materiality of Impacts, Risks and Opportunities

  We assessed impacts, risks, and opportunities based on the dimensions specified in ESRS: scale, scope, likelihood of occurrence, and, for negative impacts, the irrevocable nature. The assessment included both the impact of our activities on the external environment (impact materiality), and risks and opportunities that could affect the financial performance of the Group (financial materiality).

- **Stage 4:** Materiality thresholds and confirmation of results

  Finally, we ranked the identified material topics and developed a materiality matrix, which forms the basis for further strategic actions. To identify significant IROs, we adopted a threshold of 3.5 on a scale of 1 to 5 for both impact perspective and financial materiality. This means that IROs with materiality ranging from medium (3) to high or higher were considered material, taking as a reference point that values greater than 3.5 represent events of medium-high severity and events of medium-high probability of occurrence.

  We also assessed the validity and consistency of the list of IROs identified as material. From a quantitative perspective, assuming that the distribution of materiality events follows a normal distribution (mean = 3 and standard deviation = 0.5), the probability of a value of 3.5 is approximately 16%, which is considered reasonable for a material event.

The results of the analysis were confirmed by top management representatives and approved by the ESG Committee. The materiality matrix is designed to help effectively manage ESG issues within the strategic directions and to target the areas of greatest importance to the Group and its stakeholders. As the identification of IROs took place with reference to 2024, the Group as of 31 December 2024 did not yet have processes in place dedicated to the ongoing monitoring and management of material IROs as part of the integration of IROs into the overall management processes specific to the Group. In 2025, the Group will be taking steps to supplement existing processes with the component of material IROs.

Materiality Matrix of the Group

As a result of the process described above, we developed a materiality matrix that enables the identification of key impacts, risks, and opportunities significant both from the perspective of their impact on the external environment and the financial performance of the organization. Each material topic was classified based on its relevance to the operations of the Group.

The resulting matrix serves as the foundation for integrated management of ESG issues, strategic decision-making, and the implementation of actions within the Group's business model. The outcomes of the materiality analysis highlighted topics of critical importance as well as those of an informational nature. This allows for the prioritization of actions in a way that best addresses the risks and needs associated with the operations of the Group.

ESRS	Subtopic	Impact perspective		Financial perspective	
		+	–	Risk	Opport.
* E1: Climate Change	1. Climate change mitigation 2. Energy	Critical	Significant	Critical	Significant
E2: Pollution		Informative	Minimal	Informative	Minimal
E3: Water and Marine Resources		Minimal	Minimal	Informative	Minimal
E4: Biodiversity and Ecosystems		Informative	Informative	Informative	Minimal
E5: Circular Economy		Informative	Informative	Minimal	Minimal
* S1: Own Workforce	3. Working conditions 4. Equal treatment and opportunities for all 5. Other work-related rights	Significant	Critical	Significant	Minimal
S2: Workers in the Value Chain		Informative	Informative	Minimal	Minimal
* S3: Affected Communities	6. Communities' economic, social and cultural rights	Informative	Significant	Minimal	Minimal
* S4: Consumers and End-Users	7. Information-related impacts for consumers and/or end-users 8. Social inclusion of consumers and/or end users	Significant	Significant	Critical	Minimal
* G1: Business Conduct	9. Corporate culture 10. Protection of whistleblowers 11. Management of relationships with suppliers including payment practices 12. Corruption and bribery	Significant	Significant	Significant	Minimal

Legend

* Material topic

Topic evaluation: Critical ≥4.5 Significant 4.5>x≥3.5 Informative 3.5>x≥2.5 Minimal <2.5

Based on the double materiality assessment, we classified five sustainability-related topics for inclusion in this statement.

The results of the assessment include distribution of impacts, risks, and opportunities according to the ESRS thematic standards.

ESRS E1 Climate Change

Material Subtopic	Type of IRO	Description and location of Impact, Risk or Opportunity (IRO)
Climate Change Mitigation	Impact	Negative environmental impact resulting from financing borrowers who are unable to adapt their business models to a low-carbon economy.
	Impact	Increase in greenhouse gas emissions related to portfolio activities (retail banking loans).
	Impact	Increase in greenhouse gas emissions related to portfolio activities (institutional banking loans).
	Opportunity	Increase in revenues due to (1) the growth in the volume of financing granted for real estate that meets the criteria of our Sustainable Finance and Investment Classification System, (2) financing and advisory services for the expansion of electric vehicle charging infrastructure, (3) financing and advisory services for the transition to electric vehicles, and (4) financing for water, waste, and soil treatment, improved energy efficiency, and lower emissions.
	Opportunity	Increased customer trust by offering loans and advisory services to help identify opportunities for property modernization.
	Opportunity	Market leadership through (1) funding of technologies to support low-carbon mobility and (2) funding and advice on emission reduction technologies in agriculture.
	Opportunity	Differentiation in the market through (1) encouraging and supporting clients across the entire value chain in adopting more sustainable business practices and (2) providing financing and advisory services for early-stage companies focused on solutions enabling the energy transition.
	Opportunity	Growth in green bonds, green loans, and sustainability-linked financial instruments.
	Opportunity	Increased revenue by financing the development of new technologies, such as hydrogen, carbon capture, utilization and storage (CCUS), biofuels, and energy storage in a broader sense.
	Risk	Reputational risk stemming from perceptions by customers, investors, and other stakeholders that banks are not doing enough to achieve low-carbon goals or are acting contrary to their policies.

	Risk	Reputational risk due to failure to achieve climate and environmental goals, including those related to the bank's own operations and those of its clients, which may result in financial losses.
	Risk	Risks arising from activities in various sectors that hinder climate mitigation.
Energy	Impact	Contributing to environmental protection through increased use of renewable energy and other low-carbon technologies.

ESRS S1 Own workforce

Material Subtopic	Type of IRO	Description and location of Impact, Risk or Opportunity (IRO)
Working conditions	Impact	Flexible working conditions enabling employees to balance work with their personal circumstances.
	Impact	Promoting employee health and well-being through appropriate monitoring and best practices, as well as health and safety initiatives.
	Impact	Potential harm to employees through exposure to longer working hours, controversies related to corruption and human rights violations, or proven breaches.
	Impact	Protecting employees through adequate wages and benefits.
	Impact	Positive impact on employee wages due to adjustments aligned with the current economic situation in Poland.
Equal treatment and equal opportunities for all	Impact	Upskilling employees through training and professional development initiatives.
	Impact	Gender pay gaps and underrepresentation of women across all levels of employment.
Other work-related rights	Impact	Lack of employee privacy protection due to the database infrastructure and data management software used by the Bank to host and manage all operations.

ESRS S3 Affected Communities

Material Subtopic	Type of IRO	Description and location of Impact, Risk or Opportunity (IRO)
Economic, social, and cultural rights of communities	Impact	Human rights are not guaranteed due to financing activities with known past and recurring incidents, without prior validation processes.
	Impact	Failure to consider human rights issues in the assessment of financial projects.
	Impact	Lack of protection for affected communities due to the absence of monitoring mechanisms and compliance reviews for funds used in sectors and/or activities with a high risk of environmental and social impacts.
	Impact	Financing clients engaged in activities deemed unauthorized, contrary to the Bank's policies and ethical standards, which could pose risks to society.
	Impact	Adverse impacts on human rights due to insufficient or preliminary evaluation and/or monitoring of financed projects.

ESRS S4 Consumers and End-Users

Material Subtopic	Type of IRO	Description and location of Impact, Risk or Opportunity (IRO)
Impact of information on consumers or end-users	Impact	Educating retail customers on online threats and ways to mitigate them.
	Impact	Quality of information and data protection are not guaranteed for vulnerable customers regarding how their data is used, stored, and shared, or ensuring that customers sufficiently understand how their data is managed.
	Impact	Customer inquiries, complaints, and claims are not addressed or do not result in necessary changes and modifications due to a lack of systems and processes.
	Impact	Lack of price transparency for customers caused by the Bank engaging in price abuses without prior notice or justification.
	Impact	Lack of customer privacy protection due to the database infrastructure and data management software used by the Bank to host and manage all operations.
	Impact	High trust among Polish customers in data security reflects the positive impact of banks on data protection.
	Risk	Risk of cyberattacks threatening customer data privacy.
	Risk	Risk of severe security breaches caused by malicious practices or human errors by employees, such as the use of unauthorized software, technical user violations, or data exfiltration and leaks.
	Risk	Risk of violating personal data protection regulations concerning vulnerable customers.
	Risk	Risk of not addressing customer inquiries, complaints, and claims due to ineffective systems.

	Risk	Risk of lack of price transparency for customers due to the Bank engaging in price abuses without prior notice or justification.
Inclusion of consumers or end-users	Impact	Lack of access to products and services for vulnerable customers due to the absence of inclusive and accessible product/service identification in the catalogue.
	Impact	Failure to ensure financial well-being, utility, and accessibility of financial services for customers due to a lack of product modifications or monitoring of their effective implementation.
	Impact	Insufficient reach and utility of products for the entire population and/or contributing to barriers in access to financial products due to product and service design processes.
	Impact	Lack of additional conditions for vulnerable customers in debt collection or recovery processes due to improper identification.
	Impact	Financial abuse of vulnerable customers due to a lack of preventive transaction monitoring for individuals with legal guardians.

ESRS G1 Business conduct

Material Subtopic	Type of IRO	Description and location of Impact, Risk or Opportunity (IRO)
Corporate Culture	Impact	Acting responsibly by considering not only the interests of investors and the Bank but also the impacts on employees, society, and the environment, including paying taxes.
	Impact	Failure to uphold commitments to respect human rights due to a lack of appropriate governance structures, communication channels, and scalability.
	Risk	Risk arising from the absence of adequate governance structures, internal regulations, and scalability to manage and address ESG issues.
Whistleblower Protection	Impact	Protecting the confidentiality of whistleblower information through an effective communication system where the Bank provides uniform information to authorities via robust, unified rules and procedures in whistleblowing channels.
	Impact	Increase in recurring incidents due to the lack of internal measures to effectively address issues reported through complaint channels and the failure to implement continuous improvements.
Supplier Relationship Management, including Payment Practices	Risk	Risk resulting from the failure to implement operational resilience solutions, such as meeting DORA (Digital Operational Resilience Act) requirements across the entire value chain.
Corruption and Bribery	Impact	Combating all forms of corruption.

During the double materiality analysis, we conducted an assessment of impacts, risks, and opportunities arising from various sustainability areas, based on the list of reporting topics indicated in ESRS 1, paragraph AR 16. As part of this analysis, we utilized tools such as UNEP FI Impact Analysis and Encore (providing data on dependencies between production processes and ecosystem services), opinions from our stakeholders (both internal and external), as well as an analysis of activities financed by the Group.

Based on the results obtained, the following topics were not deemed material, meaning that the related impacts, risks, and opportunities do not meet the materiality thresholds:

- ESRS E2: Pollution
- ESRS E3: Water and Marine Resources
- ESRS E4: Biodiversity and Ecosystems
- ESRS E5: Resource Use and Circular Economy
- ESRS S2: Workers in the Value Chain

The key considerations behind this assessment include:

- Qualitative and quantitative analysis (including established materiality thresholds).
- Portfolio structure, where approximately 60% of exposures relate to households, and the implemented "Environmental, Social, and Climate Change Risk Management Policy" limits the Group's exposure to financing companies from polluting or resource-intensive industries. As a result, the Group’s impact and exposure to issues related to pollution, water, biodiversity, and the circular economy were assessed as immaterial.
- Stakeholder engagement sessions and surveys have shown that our stakeholders perceive the above-mentioned issues as less critical in the context of the Group’s activities.

Description of the processes to identify and assess climate-related material impacts, risks and opportunities (E1.IRO-1)

The Group's climate-related impacts

The materiality of the Group's impact on climate has been assessed in accordance with the methodology discussed in the previous subsection. As part of the materiality assessment process, the Group considered its energy consumption from own operations (see disclosures in subsection E1-5), as well as its greenhouse gas (GHG) emissions across the value chain – a review of the Group's activities to identify sources of GHG emissions across its entire value chain was conducted in line with the methodological assumptions outlined in the GHG Protocol (see disclosures in subsection E1-6). Through these analyses and in line with the characteristics specific to the banking sector, no significant climate-related impacts were identified within the upstream segment of the Group's value chain. However, as is typical for financial institutions and considering the structural aspects of the Group's portfolios, significant climate-related impacts were identified in connection with GHG emissions financed by the Group, which represent downstream value chain impacts. Financial institutions' own operations are not characterized by high emissions, as they primarily involve office-based activities. Nevertheless, the Group acknowledges the importance of responsible energy management, which translates into Scope 1 and Scope 2 GHG emissions, and has also deemed its impact in this area as material. The analysis also considered the strategic plans and objectives of the Group, which are discussed in more detail in subsection E1-4. A complete list of the Group's identified material climate-related impacts can be found in the previous subsection.

Climate change risks and their impact on the business

Properly identifying the risks associated with climate change allows us to take action to increase our resilience to these risks. It also allows us to better take advantage of opportunities and address challenges posed by climate change in order to improve the growth dynamics, financial performance and the reputation of the Group. In line with available regulatory guidance, we identify and analyse climate change risks under two categories: physical and transition risks. Based on market practice, available literature and the results of our double materiality assessment, we assume that climate change risks are of key importance in the financial industry for the entities financed by a given institution through their impact on the profitability of exposures to these entities and on the institution's reputation arising from business relationships with financed entities. Compared to the financial risks potentially arising from the impact of climate change risks on the financial instruments portfolio, the potential financial risks associated with the impact of climate change on the Group's own operations and suppliers are negligible.

Physical risks

Physical risks arise from the increasing severity and frequency of extreme weather events, such as severe storms or flooding (acute physical risks). In many sectors, these can cause direct damage to assets and disruption to infrastructure. These risks can also affect companies indirectly, by necessitating a change in their business profile, increasing costs (e.g. insurance) or even preventing them from conducting business.

The second group of physical risks are those associated with gradual and prolonged changes in climate patterns over the medium to long term, particularly as a result of increases in average temperatures (chronic physical risks). In this category, the agricultural sector has a particular risk exposure, due to an increase in the risk of land erosion, which has an impact on the quality and quantity of the crops. In the medium and long term, the deteriorating hydrological situation in Poland and the threat of drought are also risk factors. Lack of adequate water retention systems and water shortages can have a number of negative effects. They may affect various sectors of the economy, including, among others, the energy sector (e.g. thermal power plants using river water in cooling systems may have to reduce energy production during periods of drought). Deterioration of hydrological conditions may also mean an increase in fire risk and potential losses in, among others, timber production.

Transition risks

Transition risks are associated with the transition towards a low-carbon economy, in line with the goals of the Paris Agreement and the strategic direction set by the European Green Deal. Such a transition implies major structural changes in the global economy, entailing many risks, including rapidly emerging losses from so-called stranded assets. The consequences of these processes are complex and multidimensional, making the assessment of transition risks difficult, but extremely important. From the Group's perspective, these risks can affect the Group both directly and indirectly through their impact on the Group's customers.

One category of transition risks is regulatory risks. These are related to the amendment of regulations to combat climate change and promote adaptation to it. New, stricter regulations that will force climate-friendly solutions may translate into higher operating costs for some companies. Sectors dependent on coal and other fossil fuels, on which the Polish energy mix is predominantly based, are particularly vulnerable to these risks. Regulatory risks arise from the rising cost of CO_2 emissions, stricter reporting and data collection requirements and even regulatory changes restricting the operation of some particularly high-emission entities. A risk not yet so widespread in Poland, but already noticeable in Western European countries, are lawsuits brought, for example, by NGOs.

These are aimed at holding companies legally responsible for contributing to climate change or fighting greenwashing practices. The risk of litigation applies largely to companies operating in the most polluting and carbon-intensive sectors.

Technological risks are another group, as decarbonisation and the transformation of the economy will require support in the form of technological innovation. For many companies and industries, profound technological change may mean the loss of asset and infrastructure value, as well as the need to invest in R&D and the implementation of new technologies.

The transformation and structural changes of the economy are also associated with market risks. Changes in the demand and supply of raw materials and commodities will affect their prices and, as a result, the production costs of companies. Consumer choices and the broad macroeconomic environment, including the level of competitiveness of the economy or the level of interest rates, will also be subject to change.

The last group of transition risks are reputational risks. These relate to increased consumer awareness and unethical or unconscious greenwashing actions by companies.

Analysis and assessment of the transmission of climate risks to banking risks

Climate risks, and ESG risks more broadly, have not been singled out as a separate category of risks relevant to our Group. The approach taken is to analyse and assess the transmission of climate risks into traditional financial risk categories, in line with currently available supervisory and regulatory guidance.

The results of the analysis we carried out for the Bank are shown in the table below.

Impact of physical risks	Impact of transition risks	Risk management approach in the Bank
Credit risk (downstream)		
Climate risk can negatively affect borrowers and reduce their ability to service their debt. More frequent and intense weather emergencies and natural disasters may also reduce the value of the loan collateral.	EU or national regulations may reduce the debt servicing capacity of business borrowers operating in certain sectors, primarily in high-carbon sectors such as: → energy, → fuel sector, → transport.	We integrate ESG risks into the credit risk assessment and monitoring process, both at the customer level and at the loan portfolio level. The following section describes the changes that are gradually being introduced into the credit process. ESG issues are becoming increasingly important in sector analyses and strategies.
Market risk (downstream)		
Risk of losses arising from changes in the value of the Bank's assets and liabilities caused by natural disasters and sudden weather events.	The cost of CO_2 emissions may increase costs for some companies (particularly in carbon-intensive sectors such as energy and fuel). This may lead to a reduction in revenue for these companies and, consequently, a reduction in investment capacity. This, in turn, may reduce the number of new credit applications. Regulatory pressures may indirectly affect the financial market by reducing investment in selected customer groups.	Due to the current structure of the trading book, the Bank does not identify a quantifiable impact of ESG factors on market risk. This means that there is no material impact of supply, demand or instrument prices on the Bank's result or on the level of risk incurred. At the same time, the Bank continuously analyses whether the impact of ESG factors on market risk is becoming material, in particular with regard to potential changes in the structure of the trading book.
Liquidity risk (downstream)		
Climate change, including natural disasters and sudden weather events, can cause a sudden increase in the need for cash.	No significant impact of transition risk was identified.	Appropriate procedures have been defined so that ESG risks are included in the annual liquidity adequacy assessment process (ILAAP) in which we estimate net outflows.
Operational risk (own operations and upstream)		
Sudden weather events may affect the conduct of business in the Bank's branches (e.g. flooding, lack of power supply).	Higher energy costs may increase the burden on the Bank (e.g. increase in the cost of renting space).	ESG risks are identified, valued and monitored as part of the risk self-assessment process. They are mandatory risks in this process. As part of the scenario analyses, a scenario is examined that assumes the materialisation of events whose cause lies in ESG factors. Under current regulations, the bank's units are required to report ESG events to the operational event database. In November 2023, operational risk indicators monitoring ESG risks were included in the reporting.
Business risks (entire value chain)		
No significant impact of physical risk was identified.	In the short term, there is an increase in costs associated with the transition to a low-carbon economy. Some of these costs are passed on to consumers, which may reduce their willingness and/or ability to take out consumer loans (e.g. to buy new cars).	The impact of transition risks on the Bank's business operations is analysed on an ongoing basis, and this is reflected in the Bank's strategic activities and product portfolio.

	Regulations and shifts in customer decisions may create new opportunities to offer products or services. Failure to act appropriately may lead to a loss of customers to competitors.	
Reputational risk (entire value chain)		
No significant impact of physical risk was identified.	Continued financing of sectors negatively perceived by regulators, the market and rating agencies (this is mainly in relation to carbon-intensive sectors) could negatively affect the Bank's rating. Possible inadequacies in the management of communications to customers (greenwashing) may negatively affect the Bank's reputation. Possible collaboration with suppliers with controversial sustainability practices may negatively affect the Bank's reputation.	We pay particular attention to the transparent communication of sector policies. We apply reputational risk management policies. We seek to engage clients in addressing climate change and environmental conditions. We conduct appropriate analysis in terms of reputational risk and analyse clients' climate plans.
Compliance risk (entire value chain)		
No significant impact of physical risk was identified.	Regulatory pressures are likely to intensify, which may increase in-house and/or consultancy costs as a result of meeting the obligation to comply with new regulations. In the event of non-compliance with the new regulations, there may be a risk of penalties imposed by market regulators.	We keep our Bank's regulations under review and fully comply with the requirements set by EU and national regulators. As an entity of the global Santander Group, we are one of the founding members of the Net Zero Banking Alliance.

Group companies are developing their approach to managing climate risks in line with their regulatory schedules. In particular, at Santander Consumer Bank, as an independent banking institution, an analysis of the materiality of the impact of ESG risk factors, with a particular focus on climate risks on traditional financial risks, was conducted in 2024. Based on the analysis, Santander Consumer Bank will carry out further activities to develop its approach to managing climate risks in its current processes. Meanwhile, in the subsidiaries Santander Leasing and Santander Factoring, the Bank's subsidiaries, best practices derived from the banking approach are being implemented, taking into account the specific nature of these activities.

We also considered the risks associated with climate change when preparing the financial statements in accordance with International Financial Reporting Standards – detailed information can be found in the "Climate-related risk" chapter of the financial report. Based on our analysis, we found no material impact of environmental issues on the financial statements as a whole.

More details regarding the process of identifying and assessing the materiality of climate risks can be found in the SBM-3 disclosures in the section of the report titled "Qualitative and quantitative analysis of the resilience of the strategy and business model to climate risks supporting the overall resilience assessment of the Group's strategy and business model", which describes the results of scenario analyses for the credit portfolio (downstream in the value chain), including the application of the so-called high-emission scenario. The scenario analyses were based on the scenarios defined by the Network for Greening the Financial System (NGFS) that were up-to-date at the time of their execution. As indicated at the beginning of this section, based on its expert knowledge, the Group has not identified any material physical climate-related risks concerning its own operations and the upstream part of the value chain.

Climate opportunities

The opportunities facing our Group relate in particular to the development of the renewable energy sources (RES) market and the possibility of investing in projects and companies related to this sector, as well as the possibility of engaging in the financing of transport electrification projects, including the adoption of electric and low-emission cars and low-emission public transport. Another growing area includes projects focused on the construction and redevelopment of energy-efficient buildings, as well as investments in circular economy processes. The possibility to participate in the financing of clients' transformation projects is also an opportunity. New business opportunities identified in the longer term will be related to cooperation with companies operating in the area of the transformation of the Polish energy sector, the development of advisory services for selecting low-emission and optimisation solutions for the agricultural sector, and the expansion of financial services in this area.

1.2. Sustainability Strategy of the Group

Strategy, business model and value chain (SBM-1)

Description of the business model – products and services offered

The business model of the Group is based on providing financial solutions to individual clients, micro, small, and medium-sized enterprises, as well as Polish and international corporations. We offer a wide range of banking and financial services for both domestic and international markets. Our priority is to foster customer loyalty and employee engagement, which drives growth in revenue, receivables, and deposits.

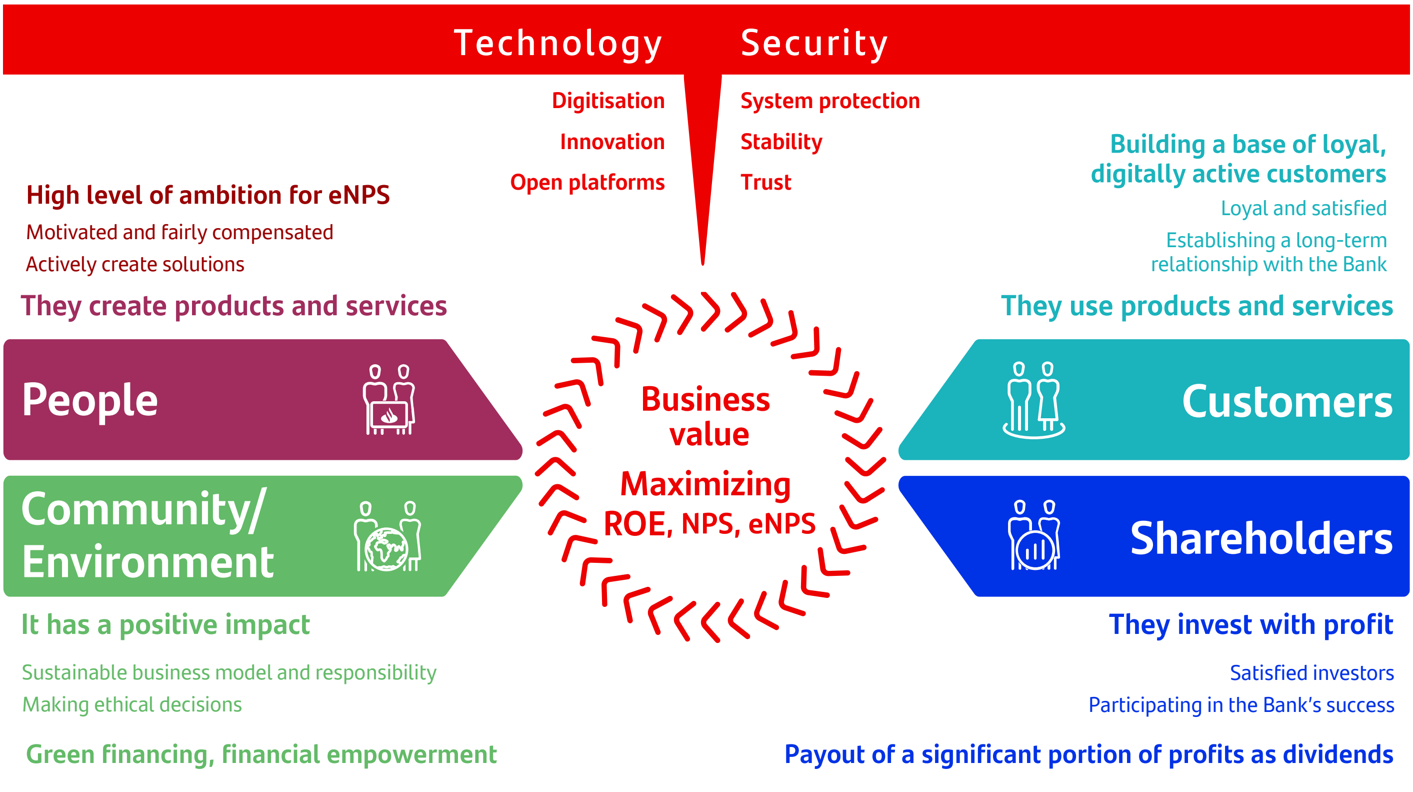
The Bank's offering is comprehensive and tailored to meet diverse customer needs, covering banking accounts, credit products, savings and investment products, payment solutions, insurance, and card services. The Bank's services are developed based on technology, innovation and open platforms. They include cash management, payment processing, foreign trade support, operations in the capital, money, and foreign exchange markets, derivatives transactions, as well as guarantee and brokerage activities.

The Bank's own offering is complemented by specialized products provided by entities capital-linked to and forming the Group, such as Santander TFI (Santander Investment Fund Company), Santander Leasing, Santander Factoring, and Santander Consumer Bank. Through collaboration with these entities, the Bank enables its customers to access investment funds, asset portfolios, leasing and factoring products, and consumer loans:

Santander Bank Polska S.A.	Universal bank, which provides a full range of services for individual clients, small and medium-sized enterprises, large companies, corporations, and public sector institutions.
Santander Towarzystwo Funduszy Inwestycyjnych S.A.	The company manages assets of investment funds. It has extensive experience in creating and managing Employee Pension Plans (EPPs) and Individual Pension Accounts (IPAs).
Santander Leasing S.A.	It offers financing for a wide range of fixed assets to clients from the small and medium-sized business sector as well as corporate clients. Santander Leasing's main products include operating leasing, financial leasing, loans for purchasing fixed assets and land, as well as vehicle rentals.
Santander Factoring Sp. z o.o.	It provides sales financing (receivables factoring) for domestic and international buyers and purchase financing (payables factoring) for suppliers operating in Poland and abroad. The company serves small and medium-sized enterprises, corporations, and international firms with a global reach.
Santander Consumer Bank S.A.	Focused on meeting the credit needs of households, mainly in the consumer finance sector and the car loan market. It also finances business entities, primarily car dealers and importers. Santander Consumer Bank's offering includes consumer loans, car financing (via car loans, leasing, and factoring), dealer financing, retail and business deposits, and insurance products.

More information about the customer profile of the Group, the main product lines, and the service model can be found in Chapter IX in the section "Organisational and infrastructure development". As a Group, we operate in compliance with local and international regulations and therefore do not offer products or services prohibited in respective jurisdictions.

Value Creation in the Group



The foundations of the value built by the Group are as follows:

- Stable funding sources,
- A strong capital and liquidity base,

- A diversified asset portfolio,
- A clear, cohesive, and consistently implemented strategic vision, focused on customer and operational efficiency,
- Streamlined processes, digital technologies, and the adoption of agile principles,
- An effective and straightforward business model,
- A diversified scope of operations and belonging to the global Banco Santander Group, which allows us to leverage international experience.

All our actions are guided by the needs and expectations of our customers. We design products, processes, and communication channels using service design principles to ensure that our customers will have high-level satisfaction and interest in continued cooperation. Our employees are a key driver of the value we create for our customers. As a Group, we place emphasis on building friendly work environment and organizational culture that promotes collaboration, equality, diversity, and inclusivity, while enhancing employee motivation, engagement, and professional development.

Our team

As of 31 December 2024, the Group employed 11,959 people in Poland, many of whom are specialists in customer service, financial analysis, and risk management. Detailed information about the employment structure can be found in the "Our Employees" section further in the statement.

More information about the profile of our operations can be found in Chapter II "Basic Information about the Bank and Santander Bank Polska Group."

Group Strategy for 2024–2026

We continue to live our purpose of helping people and bussineses prosper in order to become the most profitable bank in Poland

Our Mission	Help customers and employees prosper.					
Our Vision	The best open **PLATFORM** for financial services, operating **RESPONSIBLY** and earning the lasting **LOYALTY** our people, customers, shareholders and communities.					
Our Values	Simple | Personal | Fair					
Behaviours	Think Customer	Embrace Change	Act Now	Move Together	Speak up	risk pro
Strategic Directions	TOTAL Experience		TOTAL Digitalisation		TOTAL Responsibility	

For the years 2024-2026, the Bank's Management Board adopted the strategy titled "We help you achieve more", which is based on the mission: "Helping customers and employees prosper" and focuses on three strategic directions: "Total Experience", "Total Digitalisation" and "Total Responsibility". This strategy applies to the entire Group, except for Santander Consumer Bank, which holds its own banking license and therefore independently develops its own operational strategy.

Key Assumptions of the "We help you achieve more" strategy:

- People – Customers and Employees – are at the core of our strategy. As a Group, we are committed to creating positive emotions by offering exceptional experiences that exceed the expectations of our stakeholders. We aim to deliver these experiences in the world our customers live in-a world that is increasingly digital yet still requires human interaction. We understand that customer satisfaction and employee engagement are critical to achieving success. This is embodied in the first strategic direction – "Total Experience",
- We know that positive emotions and experiences depend largely on digital interactions. With growing determination, we pursue the path of digital innovation, providing new opportunities to customers through remote channels and ensuring efficient processes for employees. This commitment is reflected in the second strategic direction – "Total Digitalisation",
- The challenges we face as a Bank and as a society demand great responsibility. We consciously make ethical decisions, ensuring we consider our impact on communities and the environment. Through a sustainable business model, we create value for customers, employees, shareholders, and local

communities, while working toward a better future for us, our children, and our planet. This idea is captured in the third strategic direction – "Total Responsibility".

More details about our strategy can be found in Chapter IV of the Management Report titled "Development strategy".

Integration of sustainability goals into the strategy

All three strategic directions included in the strategy complement each other. Sustainability has been embedded in each of them, particularly in the strategic direction Total Responsibility, which defines a series of ambitions across the ESG areas:

- Environmental: We aim to be a role model for sustainability and transformation, supporting its clients in navigating the green transition.
- Social: We support society by promoting education, preventing financial and digital exclusion, and implementing social investments. It fosters inclusivity and diversity among employees and ensures a high level of cybersecurity.
- Governance: We fulfil our commitments to all stakeholders by complying with regulatory requirements, ensuring security and stability, and building customer trust. Additionally, we engage in dialogue with regulators and industry organizations on new legislative directions and develop the risk management culture.

Through our activities as a Group, we focus on the eight UN Sustainable Development Goals. These goals also reflect our impact on our key stakeholder groups:

Revenues of the Group

In 2024, the total revenues of the Group amounted to PLN 23,440,451 thousand. Our consolidated revenues primarily stem from banking activities and operations in capital markets (mainly through Santander TFI). This year, we are not publishing a quantitative analysis of revenues by industry sectors in which we operate, due to the lack of published sectoral ESRS.

More information about our financial performance can be found in Chapter I "Overview of activities of Santander Bank Polska S.A. and its Group in 2024".

The Group's activities in the fossil fuels sector and controversial industries

The Group's activities in these sectors are governed by internal policies, such as the ‘Social, Environmental and Climate Risk Management Policy’, the ‘Sensitive sector financing policy’, and the ‘Defence sector policy’. According to these policies:

- **Fossil fuels (coal, oil, gas):** in 2020 we committed to eliminate all exposures financing thermal coal mining by 2030, regardless of location. Currently, as a Group, we do not hold such exposures and have introduced a zero limit for the exposures in the acceptable risk level Declaration.
- **Weapons:** we do not collaborate with entities involved in the production or distribution of controversial weapons, including anti-personnel mines, cluster munitions, nuclear weapons, chemical and biological weapons, and depleted uranium ammunition. Prior to entering into cooperation, entities from the defence sector are required to sign a declaration that they will not produce, sell, or distribute these products.
- **Tobacco cultivation and production:** we enforce a strict prohibition on financing and investment activities in the tobacco sector if their production, trade, or distribution violates the World Health Organisation Framework Convention on Tobacco Control or fails to meet legal standards regarding packaging and health warnings. The prohibition also includes next-generation products such as nicotine inhalers and e-cigarettes. Products containing cannabinoids are subject to additional regulations under the criteria for the cannabis industry.

Value Chain

The value chain of the Group encompasses three key areas: upstream activities, internal operations, and downstream activities. These areas reflect our position in relationships with suppliers, customers, and stakeholders at every stage of our operations. When defining the value chain, we considered the requirements of ESRS and the EFRAG Implementation Guidance on the Value Chain.

Upstrem	Own operations	Downstream
• **Financial institutions and supervisory bodies** • **Regulators** • **Suppliers of products and services**	• **Group's assets** • **Departments and functions in the headquarters**	• **Retail** (Retail banking) • **Consumer** (Santander Consumer Bank) • **CIB** (Corporate and Investment Banking) • **BCB** (Business and Corporate Banking) • **Associated companies** • **Points of sale** (including partner locations) • **Payments and withdrawals from ATMs**

→ **Upstream**
At the upstream level of the value chain, we collaborate with a wide range of suppliers, partners, and regulatory institutions. Key contributors include providers of technology, services, and infrastructure that support banking operations. In our partnerships, we place particular emphasis on adherence to ESG standards to ensure that our supply chain supports sustainability goals.

→ **Own operations**
Our own operations encompass the Group's activities related to managing financial products and services. Our resources are focused on delivering innovative solutions, supporting clients in achieving their financial goals, and implementing principles of responsible business. This part of the value chain includes strategic actions related to risk management, operational efficiency, and the implementation of solutions that comply with regulatory requirements and ESG principles.

→ **Downstream**
At the downstream level of the value chain, we work directly with clients, offering a broad range of financial services. Our key customer groups include individual clients, small and medium-sized enterprises, corporations, and public institutions. Downstream activities also involve developing long-term relationships with business partners and financing projects that promote sustainability, such as the green transition, investments in renewable energy, and support for local communities.

Interests and views of stakeholders (SBM-2)

Stakeholders of the Group and the Bank

The Group maintains a dialogue and engagement with our stakeholders to understand their interests and views, set priorities, and identify opportunities and areas for improvement. We identify specific stakeholder groups[6] and update their profiles. We not only listen to stakeholders but also strive to ensure that the voice of the Group is heard. Therefore, we use various communication channels in our interactions.

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6 The stakeholder identification process is based on a qualitative analysis, carried out for the sustainability disclosures purposes, among others, and on dialogue sessions held in accordance with AA1000SES since 2014.

Retail customers

Communication channels:
- bank outlets
- website and other online channels (bank's blog, Facebook, X, LinkedIn, Tik Tok, Instagram)
- customer satisfaction surveys
- meetings, conferences and training sessions
- conversation with an advisor
- video chat
- web form

Business customers

Communication channels:
- bankers and customer advisers
- Business and Corporate Banking Centres
- conferences
- virtual trade missions
- opinion and satisfaction surveys
- online advisor

Employees

Communication channels:
- employee opinion surveys
- intranet
- newsletters, bulletins, mailings
- meetings with top management
- team-building events, workshops and training courses

Shareholders and the investment community

Communication channels:
- quarterly performance presentations (meetings, conferences, stock exchange and press releases)
- General Meeting of Shareholders

Regulators

Communication channels:
- reports
- formal correspondence
- day-to-day cooperation during supervisory inspections

Media and public opinion

Communication channels:
- conferences and press briefings
- interviews, expert commentaries
- face-to-face meetings
- press releases
- social media channels

Santander Group

Communication channels:
- reports
- regular correspondence
- meetings and experience sharing

Natural environment

Communication channels:
- ESG reports
- reports to institutions
- contacts and cooperation with environmental organisations

Suppliers and business partners

Communication channels:
- direct contact
- conferences and industry events

Social partners

Communication channels:
- face-to-face meetings and cooperation
- dialogue sessions with stakeholders
- activities of the Santander Bank Polska Foundation
- participation in conferences and local events
- corporate volunteering

Industry organisations and associations

Communication channels:
- direct meetings and cooperation

The Management Board and the Supervisory Board are informed about the views and expectations of stakeholders in the context of sustainability primarily through the presentation of such information at the meetings of the relevant committees.

Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

The strategy of the Group forms the foundation for the preparation of business and financial plans by individual units, whose implementation leads to the achievement of strategic objectives. The Management Board of the Bank is responsible for the overall strategic planning processes, while the Finance Management Division is the owner of the Strategic Planning Policy. The integral stages of strategic planning include: quarterly and annual reviews of the current strategy's implementation; preparation of strategic analyses and insights (market, business model, financial and business plans, as well as resource and competency analyses); development and approval of the strategy; implementation of the strategy; and monitoring the degree of its delivery.

Although the Group's strategy for 2024-2026 was developed prior to the 2024 double materiality assessment, the material impacts, risks, and opportunities identified in the medium-term horizon are closely linked to the strategy and serve as the foundation for its further development and the adaptation of activities to the evolving socio-economic and regulatory environment. The double materiality analysis provided valuable insights, enabling a better understanding of the impacts of the Group's activities on the environment and society, as well as an assessment of how these factors translate into development opportunities and potential financial risks. Currently, the Group, is in the process of analysing the identified impacts, risks, and opportunities across business units to better align our policies, objectives, and activities.

The table below presents the key material impacts, risks, and opportunities and how they are linked to our strategy. The resources allocated to manage significant impacts, risks and opportunities are described in dedicated sections of the statement.

ESRS	Subtopic	Type of IRO	Description and location of IRO	Area of the Group's strategy
Climate Change (E1)	Climate change mitigation	Impacts	Negative environmental impact due to financing borrowers unable to adapt their business models to a low-carbon economy.	Total Responsibility: ▶ Incorporating environmental risks into the business model and transforming the investment portfolio towards low-emission assets. ▶ Development of products supporting the green transition of clients and society.
			Increase in greenhouse gas emissions related to portfolio activities (retail banking loans).	
			Increase in greenhouse gas emissions related to portfolio activities (institutional banking loans).	
		Opportunities	Increase in revenues due to (1) growth in the volume of financing granted for real estate that meets the criteria of our Sustainable Finance and Investment Classification System, (2) financing and advisory services for the expansion of electric vehicle charging infrastructure, (3) financing and advisory services for the transition to electric vehicles, and (4) financing for water, waste, and soil treatment, improved energy efficiency, and lower emissions.	Total Responsibility: ▶ Development of advisory services for clients on green transition
			Increased customer trust by offering loans and advisory services to help identify opportunities for property modernization	
			Market leadership through (1) funding of technologies to support low-carbon mobility and (2) funding and advice on emission reduction technologies in agriculture	
			Differentiation in the market through (1) encouraging and supporting clients across the entire value chain in adopting more sustainable business practices and (2) providing financing and advisory services for early-stage companies focused on solutions enabling the energy transition.	
			Growth in green bonds, green loans, and sustainability-linked financial instruments	
			Increased revenue by financing the development of new technologies, such as hydrogen, carbon capture, utilization and storage (CCUS), biofuels, and energy storage in a broader sense	
		Risks	Reputational risk stemming from perceptions by customers, investors, and other stakeholders that banks are not doing enough to achieve low-carbon goals or are acting contrary to their policies.	
			Reputational risk due to failure to achieve climate and environmental goals, including those related to the bank's own operations and those of its clients, which may result in financial losses.	Total Responsibility: ▶ Proactive management of regulatory initiatives and transparent communication of ESG activities.
			Risks arising from activities in various sectors that hinder climate mitigation.	
	Energy	Impacts	Contributing to environmental protection through increased use of renewable energy and other low-carbon technologies.	Total Responsibility: ▶ Supporting the energy transition by promoting the use of renewable energy sources and low-emission technologies, both in operational activities and in client offerings.
Own workforce (S1)	Working conditions	Impacts	Flexible working conditions enabling employees to balance work with their personal circumstances.	Total Experience: ▶ Building an exceptional organisational culture that supports work-life balance.
			Promoting employee health and well-being through appropriate monitoring and best practices, as well as health and safety initiatives.	
			Potential harm to employees through exposure to longer working hours, controversies related to corruption and human rights violations, or proven breaches.	
			Protecting employees through adequate wages and benefits.	

			Positive impact on employee wages due to adjustments aligned with the current economic situation in Poland.	
	Equal treatment and equal opportunities for all	Impacts	Upskilling employees through training and professional development initiatives.	
			Gender pay gaps and underrepresentation of women across all levels of employment.	
	Other work-related rights	Impacts	Lack of employee privacy protection due to the database infrastructure and data management software used by the Bank to host and manage all operations.	
Affected communities (S3)	Economic, social, and cultural rights of communities	Impacts	Human rights are not guaranteed due to financing activities with known past and recurring incidents, without prior validation processes.	Total Responsibility: ▶ Ensuring the alignment of financial processes with ESG requirements and monitoring social impacts.
			Failure to consider human rights issues in the assessment of financial projects.	
			Lack of protection for affected communities due to the absence of monitoring mechanisms and compliance reviews for funds used in sectors and/or activities with a high risk of environmental and social impacts.	
			Financing clients engaged in activities deemed unauthorized, contrary to the Bank's policies and ethical standards, which could pose risks to society.	
			Adverse impacts on human rights due to insufficient or preliminary evaluation and/or monitoring of financed projects.	
Consumers and end-users (S4)	Impact of information on consumers or end-users	Impacts	Educating retail customers on online threats and ways to mitigate them.	Total Responsibility: ▶ High cybersecurity standards and educational programs on finance and cybersecurity. Total Experience: ▶ We design and test products and services with customers based on a catalogue of Total Experience principles.
			Quality of information and data protection are not guaranteed for vulnerable customers regarding how their data is used, stored, and shared, or ensuring that customers sufficiently understand how their data is managed.	
			Customer inquiries, complaints, and claims are not addressed or do not result in necessary changes and modifications due to a lack of systems and processes.	
			Lack of price transparency for customers caused by the Bank engaging in price abuses without prior notice or justification.	
			Lack of customer privacy protection due to the database infrastructure and data management software used by the Bank to host and manage all operations.	
			High trust among Polish customers in data security reflects the positive impact of banks on data protection.	
		Risks	Risk of cyberattacks threatening customer data privacy.	Total Responsibility: ▶ Ensuring a high level of digital security for clients and employees.
			Risk of severe security breaches caused by malicious practices or human errors by employees, such as the use of unauthorized software, technical user violations, or data exfiltration and leaks.	
			Risk of violating personal data protection regulations concerning vulnerable customers.	
			Risk of not addressing customer inquiries, complaints, and claims due to ineffective systems.	
			Risk of lack of price transparency for customers due to the Bank engaging in price abuses without prior notice or justification.	

	Inclusion of consumers or end-users	Impacts	Lack of access to products and services for vulnerable customers due to the absence of inclusive and accessible product/service identification in the catalogue.	Total Responsibility: ▸ The Bank is developing a range of user-friendly digital products and financial services that are easily accessible and designed for vulnerable clients. One initiative may include reviewing available products to ensure compliance with principles of inclusivity and accessibility, as well as introducing appropriate product labels in the catalogue so that clients can easily identify them.
			Failure to ensure financial well-being, utility, and accessibility of financial services for customers due to a lack of product modifications or monitoring of their effective implementation.	
			Insufficient reach and utility of products for the entire population and/or contributing to barriers in access to financial products due to product and service design processes.	
			Lack of additional conditions for vulnerable customers in debt collection or recovery processes due to improper identification.	
			Financial abuse of vulnerable customers due to a lack of preventive transaction monitoring for individuals with legal guardians.	
Business conduct (G1)	Corporate Culture	Impacts	Acting responsibly by considering not only the interests of investors and the Bank but also the impacts on employees, society, and the environment, including paying taxes.	Total Responsibility: ▸ Building trust through responsible ESG management and combating greenwashing.
			Failure to uphold commitments to respect human rights due to a lack of appropriate governance structures, communication channels, and scalability.	
		Risks	Risk arising from the absence of adequate governance structures, internal regulations, and scalability to manage and address ESG issues.	Total Responsibility: ▸ Strengthening the risk culture and the effectiveness of the control system in the ESG context.
	Whistleblower Protection	Impacts	Protecting the confidentiality of whistleblower information through an effective communication system where the Bank provides uniform information to authorities via robust, unified rules and procedures in whistleblowing channels.	Total Responsibility: ▸ A comprehensive whistleblower protection system ensuring the confidentiality of reports and uniform reporting procedures, in line with regulatory requirements.
			Increase in recurring incidents due to the lack of internal measures to effectively address issues reported through complaint channels and the failure to implement continuous improvements.	
	Supplier Relationship Management, including Payment Practices	Risks	Risk resulting from the failure to implement operational resilience solutions, such as meeting DORA (Digital Operational Resilience Act) requirements across the entire value chain.	Total Digitalisation: ▸ We recognise digital and process management competencies, including robotics, as key to a successful transformation. Total Responsibility: ▸ We ensure the safety of our clients in their digital interactions with us.
	Corruption and Bribery	Impacts	Combating all forms of corruption.	Total Responsibility: ▸ We build trust among clients, employees, investors, and regulators as a safe and reliable bank.

As a Group, we currently do not identify any financial effects of material risks or opportunities on our balance sheet, financial result, or cash flows that are not already reflected in our financial statements and could result in a significant adjustment to the previously reported figures in the following year.

In order to take full advantage of sustainability opportunities and efficiently manage potential risks, as a Group we take actions, both strategic and operational, which are described in dedicated environmental, social and governance sections of the disclosure. These actions lead to capital and operating expenditures, which are now embedded in the Group's overall operating mechanism. We measure the progress of our sustainability strategy and actions through strategic objectives and operational metrics – these are reviewed periodically by the Management Board, but are not validated by an external entity other than the assurance provider. The setting of strategic targets and their revision are done taking into account the expectations of stakeholders such as the Banco Santander Group and regulators.

Assessment of the resilience of the Group's strategy and business model in relation to material impacts and risks and in relation to its ability to take advantage of significant opportunities

As indicated in the SBM-1 disclosure, the Group's business model is based on a wide range of complementary products and services for specific customer segments, a network of branches and franchise outlets throughout Poland, banking technologies and remote distribution channels under development. The Group's business model consists in offering financial services to a diverse range of institutional and individual customers located mainly in Poland. The Group's services can be and are continuously adapted to the evolving market environment, taking into account customer preferences and regulatory and technological changes. The Group's business model is characterised by flexibility in the design and implementation of customised services and is not dependent on fossil fuels or on locations significantly exposed to physical climate risks – consequently, it is reasonable to conclude that the Group's business model is resilient to significant climate change impacts and risks (see the next section for detailed analysis of the resilience of the strategy and business model to climate risks). In addition, given its operations in the European Union and the extensive regulation and supervision to which the banking sector is subject, it is reasonable to conclude that the Group's business model is resilient to material impacts and risks related to employee resources, consumer and end-user relationships and corporate governance.

The Group's periodically updated strategy, in which strategic directions are set and revised by qualified and experienced management, reflects the Group's willingness to recognise and pursue significant sustainability opportunities. At the same time, through its strategy and existing internal regulations (described in the next section), the Group limits or excludes financing or fossil fuel sectors and industries or locations with higher physical climate-related risks. The directions of the Group's Strategy 2024-2026, described in the SBM-1 disclosure, illustrate that the strategy seeks to set targets for the implementation of activities that reflect positive material sustainability impacts, and identifies and supports the realisation of material sustainability opportunities. Consequently, in the Group's assessment, it is reasonable to conclude that our strategy is resilient to significant sustainability impacts and risks and enables the realisation of significant sustainability opportunities.

Qualitative and quantitative analysis of the resilience of the strategy and business model to climate risks to support a combined assessment of the resilience of the Group's strategy and business model

The resilience of our strategy was verified through a sensitivity analysis of the Bank's portfolio to climate risks – details of this analysis are available below). We excluded the other elements of the value chain from the analysis as climate risks were not identified as material for them as a result of the double materiality test. Risks identified in other areas are assessed as part of the ongoing process of monitoring strategy implementation.

The Bank has a methodology for assessing the level of climate risks – physical and transition for individual climate sectors and real estate, which introduces a taxonomy of climate sectors to the Bank. It has enabled a portfolio analysis of the materiality of climate risks for the loan portfolio. These reports are already presented at selected committees and this information is used in the credit risk assessment of clients and transactions.

In the Group (excluding Santander Consumer Bank companies due to the specificity of their operations), the Social, Environmental and Climate Change Risk Management Policy applies, as approved by the Bank's Management Board. It defines the criteria conditioning the Bank's ability to cooperate with customers operating in selected sensitive sectors. The document defines areas of activity into two categories: prohibited activities and activities subject to additional analysis. In connection with the adaptation of credit processes to the provisions of the Policy, certain exposures characterised by excessive and unmanaged transition risk are not accepted.

Limits of concentration have been defined:

- → for sectors contributing most to climate change while being most exposed to transition risk
- → for business and mortgage-backed exposures in locations assessed as highly exposed to physical risks.

and measures of acceptable risk levels relating to the Bank's declarations included in the Social, Environmental and Climate Change Risk Management Policy. Issues related to the aforementioned asset groups exposed to climate risk are incorporated into the Bank's strategic objectives aimed at increasing the volume of environmentally sustainable exposures. This approach helps mitigate the risk associated with the concentration of exposures vulnerable to climate risks (see disclosures on objectives in subsection E1-4).

Depending on the level of assessment of climate risks for each sector, elements affecting the estimation of credit risk levels are added to the credit process. For selected customers in the business segments, an individual ESCC (Environmental, Social & Climate Change) risk analysis is performed for customers or transactions, operating in the sectors defined in the Bank's policies. The conducted ESCC risk analysis and recommendation is included in the customer's credit application and, if it affects the assessment of credit risk parameters, is taken into account in the customer's rating.

In 2024, the requirements for mortgage collateral valuation were strengthened to incorporate ESG factors. From this change onward, valuations must consider both transition risks related to the energy efficiency of properties and physical risks associated with their location. Conducted analyses have shown that, in the case of transition risk approximated by the energy efficiency level of buildings, valuation differences based on this risk level are already observable within the existing collateral portfolio.

In 2024, the Bank revised its sensitivity analysis of the portfolio to climate risks, taking into account the assessment of the sensitivity of the most exposed sectors. In order to capture the nature of climate risk, the analysis was performed over three long-term time horizons – i.e. for the years 2030, 2040 and 2050. For the purpose of this analysis, it was decided to use climate scenarios defined by the Network for Greening the Financial System (NGFS). We considered the following three scenarios[7]:

- **Below 2°C Scenario** assumes that, through the gradual tightening of climate policies (with a 67% probability), the rise in average temperature will be limited to below 2°C. This scenario falls under the category of Orderly Transition scenarios.
- **Delayed Transition Scenario** assumes no reduction in emission levels until 2030 and a limited scope of negative emissions. Restricting the temperature increase to below 2°C in this scenario will require very firm climate policy actions. This scenario belongs to the category of Disorderly Transition scenarios.
- **Current Policies Scenario** assumes that currently implemented actions will be continued, but goals that remain at the level of declarations will not be achieved. The implementation of this scenario will involve a high level of physical risks and belongs to the category of Hot House World scenarios.

In addition, for physical risks, an analysis was carried out based on external data defining the level of physical risks for more than 15 climate phenomena (acute and chronic) at the municipality level using RCP (representative concentration pathways) scenarios. These are four scenarios for changes in carbon dioxide concentrations that were accepted by the Intergovernmental Panel on Climate Change in the Global Climate Model Comparison Project.

We analysed the evolution of physical and transition risks in 11 sectors most sensitive to climate risks, in which Banco Santander Group's clients operate. Nine of these 11 sectors are materially represented in the Bank's portfolio. The table below presents the results of this analysis, along with the materiality of each sector in the Bank's portfolio, including information on their share of the Group's loan portfolio as of 31 December 2024. The remaining sectors were either excluded from the analysis as accounting for an insignificant part of the portfolio or their exposure to climate risks was assessed as minimal.

The gross value of the Group’s loan portfolio (gross loans and advances to customers) amounted to PLN 180,345,564 thousand as of 31 December 2024, including: loans and advances to enterprises: PLN 73,876,598 thousand, loans and advances to individuals: PLN 88,814,191 thousand (including PLN 55,931,181 thousand related to mortgage loans), other receivables: PLN 17,654,775 thousand. Further details are available in the “Consolidated Financial Statements of Santander Bank Polska Group for 2024”.

The sensitivity analysis performed is an analysis that identifies concentrations of credit exposures in sectors or locations for which publicly available and recognised climate scenarios assume increased climate change risks. Consequently, the analysis is subject to uncertainties mainly due to the long-term nature of the climate risks, the characteristics of the scenario analyses and the qualitative approach to the development of a heatmap illustrating the potential sensitivity of the portfolio to these risks over the assumed time horizons.

[7] *Defined by the NGFS as part of Phase III in September 2022.*

The impact of climate change on the Bank's operations has been defined at a high level, but we plan to expand this analysis with a deeper quantification of the impact of risks:

Sectors sensitive to climate risks	Quality assessment*		Transition risks (RT)									Physical risks (RF)									Current sector share in the segment**				
		RF	Orderly			Disorderly			Hot House World			Orderly			Disorderly			Hot House World			BCB	CIB	SME	Individual clients	Retail
			2030	2040	2050	2030	2040	2050	2030	2040	2050	2030	2040	2050	2030	2040	2050	2030	2040	2050					
Fossil Fuel																					0.2%	4.6%	0.0%	0.0%	1.0%
Mining and Metallurgy																					7.4%	4.5%	4.0%	0.0%	3.6%
Energy Sector – Conventional Energy Generation																					0.5%	11.6%	0.3%	0.0%	2.6%
Renewable Energy Generation (RES)																					0.0%	8.6%	0.0%	0.0%	1.0%
Transport																					6.7%	1.7%	10.0%	0.0%	3.6%
Consumer car loans and leasing***																									
Agriculture																					1.2%	0.2%	17.5%	0.0%	1.9%
Industrial Processing																					20.1%	6.6%	8.4%	0.0%	8.5%
Water Supply***																					1.1%	0.0%	0.6%	0.0%	0.4%
Construction																					9.6%	4.4%	10.8%	0.0%	4.9%
Real Estate and Mortgage Sector																					10.9%	2.6%	1.8%	70.9%	31.6%
Retail sector unsecured																					0.0%	0.0%	0.0%	29.1%	11.3%
Non-climate sectors																					42.3%	58.8%	46.6%	0.0%	29.8%
Total																					**100%**	**100%**	**100%**	**100%**	**100%**

** For the purpose of a rapid assessment of the portfolio structure, a simplified materiality matrix at the aggregate macro-sector level may also be used.*

*** Portfolio structure at the end of 2024.*

**** The Consumer Car Loans and Leasing and Water Supply sectors are locally immaterial to the bank's portfolio.*

BCB – Business & Corporate Banking

CIB – Corporate & Investment Banking

SME – Small and Medium-sized Enterprises

Risk:

- *Very low (1)*
- *Low (2)*
- *Average (3)*
- *High (4)*
- *Very high (5)*

Regarding physical risks, in most scenarios, the portfolio is predominantly composed of sectors assessed as being exposed to "low risk". A slightly higher risk assessment ("medium risk") applies to the energy and renewable energy (RES) sectors, as well as agriculture and water supply. This explains the higher share of this category and exposure to risk in the Corporate and Investment Banking (CIB) and SME segments. This applies to the entire analysis period, as significant materialisation of physical risks, according to the adopted NGFS scenarios, is projected to occur only after 2050. The exposure would look slightly different under the Current Policies scenario, where higher risk assessments would also apply to the fossil fuel sector and several other sectors by 2050, as physical risks may materialise somewhat earlier in this scenario.

Regarding transition risks, in the scenario of limiting the average temperature increase to below 2°C (Below 2°C), the portfolio's exposure to these risks is slightly higher in the period to 2030, due to the very high risk assessment for the fuel sector as well as the metallurgical and mining sectors. In the medium and long term, the risk ratings for these two sectors are slightly lower, resulting in lower portfolio exposure to climate risks across all segments. The highest exposure is observed in the Corporate and Investment Banking (CIB) segment due to the relatively large share of the energy sector and the mining and metallurgy sector in the portfolio. In other segments, exposure results from the share of the transport sector, while in the Business and Corporate Banking (BCB) segment, exposure is additionally driven by the significant presence of the metallurgy sector.

In the Delayed Transition scenario, exposure to climate risks is highest in the medium term – over 20% of the Corporate and Investment Banking (CIB) portfolio will fall into the very high-risk category (13% for the Business and Corporate Banking (BCB) segment). For comparison, this category does not appear within this time horizon if the transition is orderly. In the period by 2050), the share of the very high-risk category will decrease significantly (none in the portfolios of the Business and Corporate Banking (BCB) and SME segments).

The last scenario considered, Current Policies, does not assume rapid or ambitious actions within climate policy, resulting in significantly lower transition risk ratings compared to the other scenarios. Portfolio exposure to climate risks in this scenario will decrease slightly in the period by 2040. However, for the Corporate and Investment Banking (CIB) portfolio, exposure will increase in the 2050 horizon due to the energy sector's share.

Climate stress tests in 2024

In 2024, in Santander Bank Polska stress tests were carried out on the credit risk parameters of the credit portfolios, taking into account transition risk, and the result was taken into account in the process of assessing the adequacy of allocated internal capital. The results obtained do not indicate a significant dependence of the portfolio parameters over the time horizon analysed in the stress tests. In the following year, it is planned to extend the analyses performed as part of the stress tests carried out, including the consideration of the impact of physical risks on the scenario considered.

Applied methodology:

The stress tests were performed based on climate scenarios provided by the Network for Greening the Financial System (NGFS). In the transition scenario, the main macroeconomic policy factor is the carbon price, designed to alter relative prices and accelerate the transition. The scale of the carbon price increase in the scenario reflects, in a simplified manner, the strength of climate policies modelled in each scenario.

As part of the Internal Capital Adequacy Assessment Process (ICAAP) exercise, we focused on the scenario of short-term disorderly transition risks. To do this we use the Phase III NGFS Disorderly (Delayed) Transition scenario. In the NGFS Delayed Transition scenario, policy actions aimed at reducing carbon emissions are delayed. For governments to still meet the goals of the Paris Agreement, a sharp and unexpected increase in the carbon price is necessary. However, while in the long-term disorderly transition scenario the sharp increase in the carbon price occurs from 2030 onwards, the ICAAP scenario assumes that the economic effects appear as early as 2024.

Stress tests results:

- → The simulated shock in this scenario has a negative impact on the global economy.
- → The scenario is not as severe as a typical stress test scenario in terms of the aggregate decline in GDP, but it has significant effects on some particularly vulnerable sectors.
- → The impact on property prices is negative but moderate, consistent with the effects on GDP and inflation.
- → In the medium term, the scenario generates inflationary pressure, and overall, inflation at the end of the scenario exceeds the baseline level. However, in the short term, the negative effect of the shock on economic activity leads to a slightly negative impact on inflation.
- → Accordingly, central bank interest rates are initially lower than in the baseline scenario but exceed them by the end of the scenario.
- → Overall, the disruptions and reallocation of resources caused by the sudden increase in the carbon price are leading to a decline in asset values.
- → The abrupt policy response triggers volatility in financial markets, an initial loss of confidence, and a correction in financial market valuations, such as stock prices.

The results of the stress tests are subject to uncertainties mainly due to the long-term nature of the climate risks, the characteristics of the scenario analyses and the features associated with each modelling exercise of certain parameters – the stress tests represent a certain model of the consequences of occurrence arising from assumptions made in the scenario analyses

1.3. Governance

The Role of the Management Board and the Supervisory Board (GOV-1)

Composition of the Management Board

Below is the management structure of the Bank, as the parent company of the Group. Information about the management structure of other companies within the Group is available on their respective websites. The Bank operates under a dual governance model, in accordance with the Commercial Companies Code, which divides management and supervisory competencies between the Management Board (management body) and the Supervisory Board (supervisory body). The Chairperson of the Supervisory Board is not simultaneously a member of the Management Board. All members of the Management Board are executive members. All members of the Supervisory Board are non-executive members.

As of 31 December 2024, the Management Board consisted of 10 members, of whom 20% were women. Members of the Management Board did not hold other significant positions that would negatively affect their ability to allocate sufficient time to their duties, as confirmed by the suitability assessment (each member must receive a positive assessment regarding the availability of sufficient time to perform their functions). Employees and other persons employed did not have representation on the Bank's management or supervisory bodies.

As of 31 December 2024, the Management Board of Santander Bank Polska S.A. consisted of:

Michał Gajewski

President of the Management Board/ Chief Executive Officer of Santander Bank Polska S.A.

Andrzej Burliga
Vice President of the Management Board
of Santander Bank Polska S.A.
in charge of the Risk Management Division and Data and Models Area

Juan de Porras Aguirre
Vice President of the Management Board
of Santander Bank Polska S.A. in charge of the Corporate and Investment Banking Division and Wealth Management & Insurance Division

Dorota Strojkowska
Member of the Management Board
of Santander Bank Polska S.A.
in charge of the Business Partnership Division

Lech Gałkowski
Member of the Management Board
of Santander Bank Polska S.A. in charge of the Business and Corporate Banking Division

Artur Głembocki
Member of the Management Board
of Santander Bank Polska S.A. in charge of the Compliance and FCC Division

Wojciech Skalski
Member of the Management Board
of Santander Bank Polska S.A. in charge of the Financial Accounting and Control Division

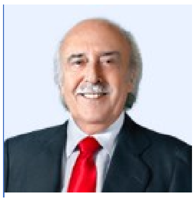
Patryk Nowakowski
Member of the Management Board
of Santander Bank Polska S.A.
in charge of the Digital Transformation Division
(resigned on 6 November 2024, effective as of 1 January 2025)

Magdalena Proga-Stępień
Member of the Management Board
of Santander Bank Polska S.A.
in charge of the Retail Banking Division and branch network

Maciej Reluga
Member of the Management Board
of Santander Bank Polska S.A.
in charge of the Financial Management Division,
Chief Economist

Composition of the Supervisory Board

As of 31 December 2024, the Supervisory Board of the Bank consisted of 10 members, of whom 40% were women. All members of the Supervisory Board are non-executive members, and 5 members (50%) were independent.



Antonio Escámez Torres
Chairman of the Supervisory Board, he does not meet the independence criteria.

José Luis De Mora
Deputy Chairman of the Supervisory Board
he does not meet the independence criteria.

Dominika Bettman
Member of the Supervisory Board
she meets the independence criteria.

José García Cantera
Member of the Supervisory Board,
he does not meet the independence criteria.

Adam Celiński
Member of the Supervisory Board,
he meets the independence criteria.

Danuta Dąbrowska
Member of the Supervisory Board,
she meets the independence criteria.

Isabel Guerreiro
Member of the Supervisory Board,
she does not meet the independence criteria.

Kamilla Marchewka-Bartkowiak
Member of the Supervisory Board,
she meets the independence criteria.

Tomasz Sójka
Member of the Supervisory Board,
he meets the independence criteria.

Jerzy Surma
Member of the Supervisory Board,
he does not meet the independence criteria.

Experience and competencies of the Members of the Management Board and Supervisory Board

Detailed information on the experience of the Members of the Management Board and the Supervisory Board of the Bank, including their expertise related to key sectors, products, and the geographic locations in which Group operates, is presented in the Chapter XII "Statement on corporate governance in 2024". This information is also available on the Bank's website.

All Members of the Management Board possess the knowledge, experience, and qualifications necessary to perform their functions effectively. As part of the process for assessing the individual suitability of Supervisory Board members (or candidates) and the collective suitability of the Supervisory Board as a whole (as well as the Management Board and its members), the Bank pays particular attention to expertise and skills related to sustainability. The Bank verifies whether the assessed individuals possess theoretical and practical knowledge, skills, or experience in risk management (identifying, assessing, monitoring, controlling, and mitigating key types of risks, including environmental, governance, and social (ESG) risks and risk factors) and collects relevant declarations. Additionally, the Bank provides Members of the Management Board and Supervisory Board with access to training, conducted by both internal and external experts, to facilitate continuous improvement of competencies in this area.

In 2024, the Bank conducted specialised training sessions on sustainability for Members of the Management Board and Supervisory Board, including:

- Strategy and leadership in ESG: The role and responsibilities of the Management Board and Supervisory Board in the context of regulatory requirements and market expectations.
- Managing ESG risks in the context of supervisory guidelines and disclosure requirements.

The training agenda included information on legal requirements, European regulatory frameworks, greenwashing, decarbonisation, climate-related risks and their impact on the Bank's activities (including the credit portfolio), methodologies for managing these risks, as well as the risks and opportunities they present. Furthermore, in 2024, Members of the Management Board participated in conferences and events focused on sustainability and ESG. These included, among others:

- Energy transition in the context of artificial intelligence – European Financial Congress
- Banks want to finance the green revolution. But not all projects will qualify – European Financial Congress
- The situation of the banking sector and the challenges of economic development – European Financial Congress
- Technological revolution: A new era of innovation – Impact 2024
- What a modern bank should look like – Banking Forum & Insurance Forum.

The active participation of the Bank's management staff in events dedicated to sustainability topics and presenting the Bank's and the Group's approach to a wide audience fosters the exchange of experiences with leaders and experts in ESG. This, in turn, contributes to expanding the knowledge and awareness of the management team and the entire organisation.

More information about the Bank’s governing bodies and their competencies can be found in Chapter XII "Statement on corporate governance in 2024".

Information provided to and sustainability matters addressed by the Management Board and the Supervisory Board (GOV-2)

The role of the Management Board and the Supervisory Board in the area of sustainability

The role of the Bank's Management Board includes:

- Joint management of the Bank's affairs,
- Representing the Bank's interests,
- Preparing business plan assumptions, approving them, and monitoring their implementation,
- Preparing financial plan assumptions, approving them, and monitoring their implementation,
- Defining the Bank's mission,
- Setting long-term plans and strategic objectives,
- Establishing standing and ad hoc committees and appointing individuals responsible for leading their work,
- Implementing corporate governance in the Bank and ensuring adherence to it,
- Evaluating, at least once a year, the level of compliance with ethical principles within the Bank.

Sustainability-related matters are discussed by the Management Board and the Supervisory Board, as well as by relevant committees. The Management Board and the Supervisory Board actively participate in setting objectives related to material impacts, risks, and opportunities by approving the business strategy, including in the ESG area. The Management Board oversees and approves the achievement of strategic objectives within the framework of Total Responsibility and is responsible for integrating impacts, risks, opportunities and ESG criteria into the business strategy (in the short-, medium-, or long-term perspective) and the risk management process. This includes, among other responsibilities, managing climate-related risks and including in the Group's ambition to seek Net Zero by the Santander Banco Group by 2050. Both governing bodies approve key policies and the internal control system and participate in reviews and acceptance of risks. The Management Board and the Supervisory Board are periodically presented with reports on the implementation of the strategy (quarterly reports and annual report), including the ESG objectives under the Total Responsibility strategic direction.

As part of the division of responsibilities among the Management Board members, the following allocation of tasks and duties related to the ESG agenda has been introduced:

- The Vice President of the Management Board responsible for the Risk Management Division is responsible for the management of ESG risks,
- The Member of the Management Board responsible for the Business and Corporate Banking Division is responsible for matters related to sustainable financing,
- The Head of the Communications and Brand Experience Area (former: Corporate Communication and Marketing Area, the name change was formally introduced in January 2025), operating outside the divisional structure, is responsible for coordinating the Group's activities related to responsible banking, including qualitative ESG reporting,
- The Member of the Management Board responsible for the Accounting and Financial Control Division is responsible for matters related to quantitative ESG reporting.

The Supervisory Board exercises continuous oversight of the Bank's activities, exercises the powers provided for in the Commercial Companies Code and the Bank's Articles of Association, and approves the annual and long-term development plans, financial plans, operational strategies, and the principles of prudent and stable management of the Bank, as developed by the Management Board. In accordance with its regulations, the Supervisory Board oversees the process of developing, implementing, and executing the responsible banking programme, as well as compliance with regulatory requirements related to the ESG area. From 2024, the competencies of the Supervisory Board's Committees, namely the Risk Committee and the Audit and Compliance Committee, have been expanded. It has been established that ESG risks will also be taken into account when verifying the risk profile of the Group, as well as during the review and recommendation to the Supervisory Board for approval of policies related to the general risk management framework applicable within the organisation. The Audit and Compliance Committee will review the Sustainability Statement and the ESG ratings awarded to the Bank and the Group.

In 2024, a dual-materiality analysis was carried out and the results were presented to the Management Board and the Supervisory Board. In addition, meetings were held with representatives of the units involved in the implementation of the objectives, dedicated to the identified impacts, risks and opportunities and their impact on the strategy and objectives of the Group.

Appointment of the Management Board and the Supervisory Board

The procedures for appointing and dismissing Members of the Management Board of Santander Bank Polska S.A. comply, among others, with:

- Commercial Companies Code,
- Banking Law,
- Statutes of Santander Bank Polska S.A.,
- Policy for the Appointment and Succession of Members of the Management Board of Santander Bank Polska S.A.

Members of the Management Board are appointed by the Supervisory Board. In accordance with the regulations, the appointment of the President of the Management Board and the Member of the Management Board overseeing the management of significant risks at the bank requires the approval of the Polish Financial Supervision Authority (hereinafter: PFSA). Members of the Management Board may be dismissed by the Supervisory Board or the General Meeting at any time. The term of office for the Management Board and the Supervisory Board is three years. Members of the Supervisory Board, including the Chairman are elected and dismissed by the General Meeting of Shareholders.

As part of the process of appointing a Management Board Member, a suitability assessment is conducted in accordance with legal regulations, the Policy for the Selection and Suitability Assessment of Members of the Management Board and Key Function Holders at Santander Bank Polska S.A., and the Methodology for the Suitability Assessment of Members of Governing Bodies of Supervised Entities, published by the PFSA.

The Management Board and the Supervisory Board are appointed with consideration of criteria ensuring the versatility and diversity of these bodies. Each Member of the Management Board undergoes an individual, independent suitability assessment, while the Management Board as a whole is subject to a collective, independent suitability assessment. These assessments are conducted at least once a year and in situations specified in the Policy, such as a change in the composition of the Management Board or a significant change in the scope of responsibilities of individual Members. If a person is deemed unsuitable to perform the role of a Management Board Member, they immediately cease to hold their position.

The Supervisory Board monitors the effectiveness of the Management Board and its members. The process of assessing the qualifications of Management Board Members and other key function holders at the Bank is carried out by the Nomination Committee and the Remuneration Committee of the Supervisory Board. The Supervisory Board evaluates the Management Board at least once a year. The Supervisory Board consists of five members who meet the independence criteria (50% of its composition). The work of the Supervisory Board is evaluated by the General Meeting, i.e., the Bank's shareholders. Once every three years, the assessment is conducted by an independent external entity and approved by the General Meeting of Shareholders.

Committees

The most important committee responsible for managing sustainability and ESG matters at the Bank is **the ESG Committee** (by resolution of the Management Board dated 27 June 2024, the Responsible Banking and Corporate Culture Committee was renamed the ESG Committee).Its tasks include supporting the Management Board in fulfilling its management responsibilities concerning strategic sustainability activities within the Bank. The committee sets the direction for strategic actions and establishes and monitors sustainability goals across all areas of the Bank's operations. The Chairman of this committee is the President of the Management Board.

The ESG Committee consists of the following members:

- President of the Management Board of the Bank – Committee Chairperson,
- Vice President of the Management Board in charge of the Corporate and Investment Banking Division and Wealth Management and Insurance Division,
- Vice President of the Management Board in charge of the Risk Management Division,
- Member of the Management Board in charge of the Retail Banking Division,
- Member of the Management Board in charge of the Business Partnership Division,
- Member of the Management Board in charge of the Financial Management Division,
- Member of the Management Board in charge of the Business and Corporate Banking Division,
- Member of the Management Board in charge of the Digital Transformation Division,
- Member of the Management Board in charge of the Financial Accounting and Control Division,
- Member of the Management Board in charge of the Compliance and FCC Division,
- Head of the Corporate Governance Department,
- Head of the Legal Area,
- Head of the Corporate Communication and Marketing Area (currently the Communications and Brand Experience Area),
- Head of the Talent Management and Organisational Culture Transformation Department,
- Chief Employee Experience Officer.

To coordinate the ongoing implementation of activities related to developing and implementing ESG solutions, including responsible banking, sustainability, corporate culture, sustainable finance, ESG risks, and the climate agenda, the Committee established a working group called the ESG Forum. The tasks of the ESG Forum include: analysing challenges, opportunities, and risks associated with the EU Sustainable Finance agenda, planning and coordinating ESG activities, regularly reporting to the ESG Committee and the Bank's Management Board (at least four times a year). The Forum also monitors progress in the implementation of ESG strategic actions by the Bank's subsidiaries. The members of the ESG Forum include senior management representatives from all divisions and areas, as well as from Santander Leasing.

In addition to the ESG Committee, the management of the Bank's impact on the environment, society, and the economy is also carried out by, among others:

- Operational Risk Management Committee,
- Disclosure Committee,
- Information Management Committee,
- Risk Management Committee,
- Risk Management Forum,

- Compliance Committee,
- Credit Committee,
- Local Marketing and Product Monitoring Committee,
- Public Policy Committee.

Supervisory Board Committees in 2024:

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

All of the above committees – within the scope of their responsibilities – are tasked with making decisions and overseeing the management of the organisation's impact on the economy, the environment and people. From 2024, the competencies of the Supervisory Board Committees have been expanded. It has been established that the ESG risks are also taken into account when verifying the risk profile of the Group, as well as during the review and recommendation to the Supervisory Board for the approval of policies related to the general risk management framework in the organisation (Risk Committee) and indicated that the Audit and Compliance Committee approves the sustainability statement.

> Detailed information about the Bank's corporate governance, the nomination process, and the independence criteria for Members of the Bank's governing bodies can be found in the Statement on Corporate Governance of the Bank for 2024, the Statutes, and the Rules of the Supervisory Board of Santander Bank Polska S.A. Additional information on the division of responsibilities, key competencies, fulfilment of independence criteria, and the term of office of the Supervisory Board Members is available on the Bank's website in the "Investor Relations" section.

Integration of sustainability-related performance in incentive schemes (GOV-3)

Incentive Programs and Remuneration Policies Related to Sustainability Issues

The remuneration policies for the Bank's management ensure an appropriate level of compensation for the Management Board, Supervisory Board, and key members of senior management. The adopted principles enable the recruitment, retention, and motivation of individuals with the competencies necessary for effectively managing and overseeing the Bank.

The remuneration of the Management Board and Supervisory Board is governed by two documents: the "Remuneration Policy for Members of the Management Board of Santander Bank Polska S.A." and the "Remuneration Policy for Members of the Supervisory Board of Santander Bank Polska S.A." These policies include a link between remuneration of the Management Board salaries and the achievement of sustainability goals. The ESG component is one of the qualitative factors considered when calculating the bonus pool for Management Board, with a weight ranging from -5% to +5% of variable remuneration. In the context of climate targets, the evaluation takes into account metrics such as the level of implementation of the sustainable finance agenda and progress on Banco Santander Group's global climate agenda, including Net Zero efforts.

The Bank also has a long-term incentive program based on the Bank's shares, which incorporates ESG goals as one of the three key evaluation elements regarding the retention award. The weight of ESG goals within the program is 20%. This includes indicators such as the number of women in managerial positions and the gender pay gap (EPG/GPG).

It is worth noting that all Bank employees, in line with the new strategy, have mandatory goals related to the "Total Responsibility" direction as one of the key pillars.

The conditions of incentive programs, including ESG and climate goals, are approved and updated at the level of the Bank's Supervisory Board. The remuneration of Supervisory Board members is fixed and is not linked to the achievement of ESG or climate goals.

More details on the remuneration of the Supervisory and Management Boards, the Incentive Program, and Bank shares held by Members of the Management Board can be found in the Chapter XII "Statement on corporate governance for 2024".

Statement on due diligence (GOV-4)

The due diligence process in the Group has been designed in accordance with the guidelines outlined in ESRS 1. The table below indicates the sections of the statement where the various stages of the due diligence process are described.

Core element of due diligence	Chapters/Subchapters in the Sustainability Statement
a) Embedding due diligence in governance, strategy and business model	Management of risks and internal controls over sustainability reporting (GOV-5) Material impacts, risks, and opportunities and their interconnections with strategy and business model (SBM-3) Policies related to climate change mitigation and adaptation (E1-2) Policies related to own workforce (S1-1) Policies related to consumers and end-users (S4-1) Policies related to affected communities (S3-1) Business conduct policies and corporate culture (G1-1)
b) Engaging with affected stakeholders in all key steps of the due diligence	Interests and views of stakeholders (SBM-2) Employee engagement and procedures for cooperation with employees and their representatives (S1-8) Engagement processes regarding impacts on consumers and end-users (S4-2) Engagement processes regarding impacts on affected communities (S3-2)
c) Identifying and assessing adverse impacts	Processes for remediation of adverse impacts and channels for raising concerns by own workforce (S1-3) Processes for remediation of adverse impacts and channels for raising concerns by consumers and end-users (S4-3) Processes for remediation of adverse impacts and channels for raising concerns by affected communities (S3-3) Mechanisms for identifying, reporting, and investigating violations (S3-4)
d) Taking actions to address those adverse impacts	Actions and resources regarding climate policy (E1-3) Actions addressing material impacts on own workforce, and approaches to managing material risks and leveraging material opportunities related to own workforce, as well as the effectiveness of these actions (S1-4) Actions addressing material impacts on consumers and end-users, and approaches to managing material risks and leveraging material opportunities related to consumers and end-users, as well as the effectiveness of these actions (S4-4) Actions addressing material impacts on affected communities, and approaches to managing material risks and leveraging material opportunities related to these communities, as well as the effectiveness of these actions (S3-4)
e) Tracking the effectiveness of these efforts and communicating	Metrics and targets (E1) Metrics and targets (S1) Metrics and targets (S4) Metrics and targets (S3) Metrics and targets (G1)

Risk management and internal controls over sustainability reporting (GOV-5)

In the context of sustainability reporting, the main risks relate to the adequacy, accuracy, and completeness of the reported data (including the completeness of disclosures in sustainability reporting). We manage these risks in several ways. We have implemented appropriate internal regulations, including the "Guidelines for preparing sustainability reporting in accordance with CSRD" and the accompanying "Guidelines for double materiality assessment" according to which:

- The designated units of the Bank are responsible for analysing double materiality and preparing sustainability reporting in accordance with the regulations. This includes, among other things, the collection and verification of the quantitative and qualitative data used in the disclosures.
- The business owners responsible for the individual data points and reported metrics within the Group ensure the quality of the quantitative and qualitative data, including its completeness, accuracy and verifiability. These owners also implement the control processes to ensure this data quality.
- Sustainability reporting is subject to attestation by a certified auditor with appropriate qualifications.
- The content of the statement is approved together with the Management Board Report on Activities by the Bank's bodies, including the Management Board, Supervisory Board and relevant committees.

In 2024, work was carried out to adapt the Bank's systems to collect and process ESG data and to expand the central repository of this data. As part of the development of data governance processes, end-to-end solutions are being implemented to establish quantitative and qualitative controls at successive stages: data acquisition from source systems, data processing and finally calculation of sustainability metrics. The completeness of the entire process will increase along with the level of automation of the individual stages of the data management process. Another element that will affect data consistency is the achievement of stability in terms of the scope of reported metrics in subsequent reporting periods.

The Bank is also working on strengthening the control environment within the Internal Control Model (ICM)., Controls are being implemented to monitor the quality and reliability of the information contained in the Consolidated Sustainability Statement. The model is in line with international standards and guidelines established by the COSO Committee (Committee of Sponsoring Organisation of the Treadway Commission). Under ICM, the Bank identifies the most significant risks and then establishes necessary controls to mitigate them, which includes the process of reporting sustainability information. As with financial information, controls are periodically evaluated (at least annually) both in their design and implementation through the formal ICM certification process. This process is designed to ensure that the Internal Control Model is functioning properly. The Model will be developed and completed to cover all aspects of reporting of sustainability data.

More details can be found in Chapter XII-"Statement on corporate governance in 2024".

Issues relating to sustainability reporting, and more broadly ESG metrics reporting, are a standing item on the ESG Forum agenda. As part of the Forum's work, the status of the preparation of the current report is monitored, significant challenges and risks related to the reporting process are notified and solutions are developed. Conclusions and recommendations are then presented to the ESG Committee for decision, and if strategic decisions are required, to the Bank's Management Board.

Additionally, processes related to sustainability reporting are reviewed by the internal audit function. In 2024, the Bank fully implemented the recommendations of this function, which included:

- Ensuring an appropriate process for preparing reports, including defining the roles and responsibilities of involved units, the process of reviewing and approving disclosures, and updating the internal control system.
- Implementing internal regulations regarding the process for conducting the double materiality analysis and preparing reports.

2. Environmental information – climate change (ESRS E1)

2.1. Strategy

Material impacts, risks and opportunities in the area of climate change

As a Group, we are committed to making ethical decisions in managing our environmental impact. This is reflected in one of the pillars of our 2024-2026 Strategy – **Total Responsibility**. Our strategic environmental goals are:

- To be a role model in sustainability and transformation.
- To help clients navigate the green transition and advise them on how to carry it out.
- To build a business network by identifying trusted partners and assisting them in organising financing.

We intend to achieve our strategic goals through the transformation of the Group and our clients in line with the objectives adopted for the coming years:

How do we achieve our strategic goals?

Transformation of the Group

- We reduce our own emissions, including by increasing energy efficiency. 100% of the electricity purchased directly by the Bank comes from RES, for the remaining volume of electricity the Bank obtains guarantees of energy origin.
- We have initiated energy production from photovoltaics on our own buildings, to be expanded in the coming years. We are also testing solutions to reduce heat energy consumption in branches.
- We integrate environmental risks into our business model.
- We train and support employees in providing green transactions, identifying ESG risks and preventing greenwashing.
- We increase the Green Asset Ratio and diversify the portfolio of green assets and products.
- We analyse "Scope 3" emissions within our portfolio and identify decarbonisation levers.
- We develop transition plans that include adaptation and climate change mitigation goals, aligned with the Santander Group strategy.
- We are preparing preferential offers for employees for ecological purposes.

Transformation of Clients

- We create transformational products and advisory services across all segments.
- We identify and leverage synergies within supply chains.
- We develop a program for the transformation of cities.
- We provide solutions for agribusiness.
- We support the energy transformation of buildings.

To assess the impact of the Group on climate change, we performed a portfolio sensitivity analysis and calculated both our own emissions (applying the GHG Protocol assumptions) and financed portfolio emissions using an internal methodology based on the assumptions of the PCAF (Partnership for Carbon Accounting Financials) methodology. The double materiality assessment identified that key impacts, risks, and opportunities exist in the following areas:

- Climate change mitigation – key impacts include negative effects on the environment through financing entities not aligned with a low-emission economy and greenhouse gas emissions from portfolio activities. However, we see opportunities such as the development of green mortgages, financing the modernisation of buildings, electric vehicles, and charging infrastructure, as well as supporting low-emission technologies in agriculture and industry. Risks include reputational damage resulting from the failure of the Group or its clients to achieve climate goals.
- Energy – impacts in this area include contributing to environmental protection by increasing the use of renewable energy and supporting low-emission technologies.

Transition plan for climate change mitigation (E1-1)

The Santander Bank Polska Group plans to adopt a transition plan for climate change mitigation. We are currently at the stage of analytical works. This involves assessing current greenhouse gas emissions, analysing climate risks, and reviewing our actions and processes. To talk responsibly and credibly about a transition plan, reliable data on greenhouse gas emissions from our own operations is essential and, above all, greater availability of actual data on the emissions of the investments and customers we finance, and their analysis, combined with an understanding of conditions and regulatory and market trends.

Only when the necessary actual data has been collected and analysed, we will be able to indicate a date for the adoption of a transition plan, however, we assume that this should be no later than with the 2026 reporting.

As part of this statement, for the first time, we have calculated and disclosed the greenhouse gas emissions financed by us, particularly those resulting from the business activities of clients financed through our loan portfolio. These estimates were conducted using the knowledge and methodologies currently available on the market. More information can be found in section E1-6.

The foundation for developing the transition plan for the Group's loan portfolio lies in the activities we are gradually implementing as part of the global climate agenda of the Banco Santander Group, including the Net Zero efforts. This strategy assumes aligning our portfolio with the goals of the Paris Agreement and the European Union policy, which highlights the significant role of the financial sector in alleviating climate change. We strive to achieve net-zero emissions by 2050, including in the entire value chain of the Group.

Additionally, in our work on the transition plan, we consider international and EU initiatives and guidelines, including:

- UN Sustainable Development Goals,
- EU Taxonomy Regulation,
- Sustainable Finance Disclosure Regulation (SFDR),
- Corporate Sustainability Reporting Directive (CSRD),
- UNEP FI Principles for Responsible Banking,
- Equator Principles,
- Material industry aspects identified by ESG ratings, such as S&P ESG Scores and MSCI ESG,
- EBA/GL/2020/06 Guidelines on loan origination and monitoring,
- Draft guidelines of the European Banking Authority on ESG risk management.

The climate actions of the Group are based on three pillars

The ambition of the entire Group is striving to achieve net zero emissions by 2050.

Striving to align our portfolio and own operations with the goals of the Paris Agreement

Adjusting the portfolio to ensure that projected carbon emissions align with the goal **of limiting temperature increases to 1.5°C**, in line with NZBA and NZAM.

Sourcing electricity from renewable sources to reduce our environmental impact

Supporting our clients in their green transformation

Helping **clients transition to a low-emission economy** by providing guidance, advice, as well as investment and business solutions for clients

Integrating climate into risk management

Ensuring compliance with regulatory/supervisory expectations and incorporating climate considerations into risk management

Current goals for reducing the emissions of the loan portfolio:

- By no later than 2030, we will discontinue financing of energy companies where revenue from coal-based energy production exceeds 10%.
- We support clients in the transition process through comprehensive financing of renewable energy sources and the development of adequate financial products.

We support the transformation of the Polish economy towards a low-emission model by providing sustainable financing, particularly in the area of renewable energy sources (RES). We are systematically increasing the share of the RES portfolio among energy sector clients. Additionally, we offer loans linked to sustainability goals (SLL). We support both businesses and individual clients through tailored products aimed at financing solutions that enhance energy efficiency in buildings, electric vehicles, heat pumps, electric vehicle charging stations, and energy storage systems. We continuously analyse market conditions and identify further actions to most effectively support the transition of clients and to limit emissions of our portfolio. More information can be found in E1-3.

In 2024, we developed more detailed metrics related to ESG risks (including in the areas of energy sectors and those sensitive to climate change) and incorporated them into relevant internal reports. These metrics were included in the update of the risk appetite and in the determination of concentration and exposure limits. In the longer term, developments in this area will also include verifying the degree of implementation of decarbonisation levers (primarily the growth of financing for green buildings, RES and electric vehicles).

2.2. Policies related to climate change mitigation and adaptation (E1-2)

Significant impacts, risks and opportunities related to climate change mitigation and adaptation

As the Group, we are aware that we have a significant impact on the environment and the climate through the greenhouse gas emissions resulting from our loan portfolio, in particular from the financing of high-emission entities or those struggling to transition to low-carbon ways of doing business. We recognise and manage significant climate change risks on an ongoing basis,, in particular those related to the aforementioned financing of activities generating significant volumes of greenhouse gas emissions, which may translate negatively into the credit quality of such exposures, as well as our reputational risk. At the same time, we identify a number of significant business opportunities related to climate change, including in the context of financing activities that contribute to climate change mitigation. We see the opportunities as increasing the volumes of environmentally sustainable financing, as well as differentiating ourselves from the competition by funding and advising early-stage companies focused on solutions to enable energy transformation. Our approach to identifying and managing significant climate-related risks and opportunities is described in more detail later in this chapter in section E1.IRO-1.

Policies on management of impacts, risks and opportunities related to climate change mitigation and adaptation (MDR-P)

Policy	Description of policy content	Description of the scope of the policy or its exclusions
Responsible Banking and Sustainability Policy	The policy sets out the Group's approach to minimising the environmental impact of its activities. ***Addressed IRO:*** ▶ *Increase in greenhouse gas emissions associated with portfolio activities (retail and institutional banking).* ▶ *Increase in revenue through growth in the volume of financing granted for properties that meet the criteria of the internal Classification System for Sustainable Financing and Investment, financing and consulting on the expansion of electric vehicle charging infrastructure, financing and consulting on the transition to electric vehicles, and financing for water, waste and soil, greater energy efficiency and lower emissions.* ▶ *Market leadership through financing technologies that support low-carbon mobility and financing and advising on emission reduction technologies in agriculture.* ▶ *Increase customer trust through tailored offerings and advice to help them identify opportunities to upgrade their properties* ▶ *Growth in green bonds, green loans and sustainability-linked financial instruments.* ▶ *Increase revenue by financing the development of new technologies such as hydrogen, carbon capture, utilisation and storage, biofuels and energy storage in a broader sense.* ▶ *Contribute to environmental protection by increasing the use of renewable energy and other low-carbon technologies.*	Group
Social, Environmental and Climate Change Risk Management Policy	The policy sets out the Group's approach to analysing the environmental and social risks of financed customers and applicable investment exemptions. Application of the document's principles is intended to support customers in their transition to a low-carbon economy. ***Addressed IRO:*** ▶ *Standing out in the market by encouraging and supporting clients along the entire value chain to adopt more sustainable business practices and by financing and advising early-stage companies focused on solutions enabling the energy transition.* ▶ *Reputational risk due to clients, investors and other stakeholders believing that banks are not doing enough to achieve low-carbon goals or are acting inconsistently with their policies.*	Group

- *The reputational risk of not achieving climate and environmental goals, including those related to own and client activities, can result in loss.*
- *Risks from the activities of companies operating in various sectors that do not enable climate mitigation.*
- *Negative environmental impact due to financing borrowers who are unable to adapt their business models to a low-carbon economy.*

In matters relating to environmental impact, we operate according to the precautionary principle. This approach is described in the "Responsible Banking and Sustainability Policy", in which we include our actions and commitments in this regard. In line with the policy, recognising society's right to live in a healthy and clean environment, we aim at minimising the environmental impact of our activities by:

- analysis and identifying negative environmental impacts as part of the risk assessment process for financial and investment activities in a manner consistent with international standards,
- gradual development of transactional portfolios in line with the idea of promoting and financing a low-carbon and climate-resilient economy (in particular renewable energy sources or energy-efficient construction or infrastructure), which is essential for climate change mitigation,
- managing the environmental impact generated by the Bank's infrastructure by applying management systems based on international regulatory standards, taking into account continuous improvement, and by controlling the most important aspects of the energy efficiency of own operations (including the use of renewable energy sources), consumption, waste and emissions.

The Bank's Management Board is responsible for the implementation of the policy. It is applied accordingly in all Group Companies (excluding Stellantis – due to the size and nature of the company's operations) and is publicly available on the Bank's website. There were no significant changes to the content of the Policy in 2024.

We analyse environmental and social risks to clients operating in the oil and gas, energy, mining and metals and soft commodities sectors. These issues are governed by the "Social, Environmental and Climate Change Risk Management Policy", which sets out the criteria for identifying, assessing, monitoring and managing socio-environmental risks. In addition, it defines our standards for investing and cooperating with clients operating in industries with the greatest impact on the climate. The Bank's Management Board is responsible for the implementation of the policy and the policy is adapted and applied in all Group Companies (excluding Santander Consumer Bank entities due to the specific nature of their business) and it is publicly available on the Bank's website. The Policy has been revised and updated, but there were no significant changes to its content in 2024.

These criteria apply to clients in all segments (CIB, BCB and SME), as well as to the Group as a whole in relation to financing, advisory services, capital management services, asset management and insurance. "Social, Environmental and Climate Change Risk Management Policy" identifies the types of activities subject to prohibitions or restrictions. These include:

- **Oil and gas:** exploration, production, production and processing, including refining, transportation, storage and wholesale distribution.
- **Power generation and transmission:** All power plants regardless of energy source, and construction and maintenance of transmission lines.
- **Mining:** prospecting and mining exploration, mine construction and operation, restoration and reclamation of natural areas.
- **Metals:** processing of ores to extract the metal they contain, production of alloys from ingots, processing of by-products: scree, waste rock, slag and sand.
- **Soft commodities:** manufacture and wholesale distribution of wood products processed into lumber, wood-based cellulose, paper and textiles; soya; palm oil; rubber; cocoa; coffee; cotton; sugar cane; biomass or biofuel; beef production in high-risk geographical areas. This includes customers who purchase these commodities directly from plantations or farms, accounting for more than 10% of their total purchases.

In addition, we ended our credit services for power station coal producers in 2023 (according to the Policy, this was to be achieved by 2030 at the latest). We also introduced a zero limit for this item in the Declaration of Acceptable Risk Level.

2.3. Actions and resources in relation to climate change policies (E1-3)

Key actions we are taking to implement climate policies

The key measures we are taking to implement our climate policy relate to our own operations and the downstream part of our value chain. The downstream activities are carried out for clients, for the loan portfolio and investment funds and are mainly related to our Sustainable Finance and Investment Classification System (SFICS) and to counteracting greenwashing.

The expected outcomes of the measures described below are expressed in the strategic objectives defined by the Bank for climate issues in the area of climate policy – these objectives and the associated time horizons are presented in subchapter E1-4.

Own operations

The internal measures we undertake within the framework of the "Responsible Banking and Sustainability Policy" are:

- promoting environmental protection in accordance with international regulatory standards and a system of continuous improvement – in 2024, the Bank received ISO14001 certification, which confirmed that the environmental management system for the Bank's head office buildings meets the requirements of the standard. Santander Leasing is also ISO 14001 certified,
- measuring and monitoring natural resource consumption, emissions and waste production in most of the Bank's facilities.

Currently we do not implement activities that qualify as nature-based solutions. Due to the nature of our business, the implementation of planned climate change mitigation and adaptation activities is not dependent on the availability or allocation of resources. These activities are an internal part of our strategy and determined primarily by regulatory requirements and market demand.

In the Group companies, we are taking measures to mitigate the Group's negative impact on the climate. We are identifying sources of greenhouse gas emissions and changing our vehicles to low-emission ones. We are increasing the efficiency of energy consumption. In 2024, 100% of electricity purchased directly by the Bank came from RES, for the remaining volume of electricity used by the Bank we have obtained guarantees of energy origin. Percentage consumption of electricity from RES in Group's subsidiaries:

Santander Consumer Bank*	100%
Santander Leasing	32%
Santander TFI	79%
Santander Stellantis Financial Services	75%

**Order of companies based on energy consumption – from highest to lowest. Since Santander Factoring subleases space from Santander Bank Polska, the company's electricity consumption is counted as the Bank's consumption.*

The Bank has also started producing its own energy from photovoltaics (in 2024 we produced 32 MWh – the total consumption of the Group is 23,609 MWh), we are continuing to replace lighting with LED and we are testing solutions to reduce the consumption of thermal energy in branches. Educational activities are also being carried out to raise climate awareness among employees.

	MWh	% of own production RES energy
Energy from our own RES production	32	
Energy from RES in the Group	23,486	0.14%
Total energy in the Group	23,609	0.13%

Credit portfolio

Actions taken towards external stakeholders are:

- limiting financing for activities that may have a direct negative impact on the environment and society and cause long-term effects related to climate change,
- engaging in dialogue with customers to encourage them to change their business practices to more sustainable ones,
- supporting the transformation of clients in the above-mentioned area through funding,
- encouraging suppliers to adopt environmental commitments and to move towards a low-carbon economy.

In the Group, we have carried out a decarbonisation leverage analysis. Based on the analysis of transition risk for our clients (presented in section E1.SBM-3) and market trends, we highlighted four sectors that could prove to be such levers in our loan portfolio:

- real estate (both commercial and residential),
- industry – while we see potential for decarbonisation measures here, given the complexity of this sector and the lack of reliable data, further analysis is required. In addition, this sector is heavily dependent on the national energy mix,

- energy sector – funding renewable energy sources (RES),
- transport – leasing electric cars, financing low-emission public transport.

The barriers to leveraging these opportunities include, in our view, the low level of public support for the transition, technological challenges (in many cases, a lack of competitive low- or zero-carbon alternatives), and logistical barriers (e.g., insufficient charging infrastructure for electric vehicles).

In 2024, the effective fund distribution occurred in two programmes – support for electromobility and decarbonisation of residential buildings. However, a broad distribution of funds from the National Recovery Plan programmes was not launched. There is also a lack of a comprehensive approach to reducing the main existing sources of emissions. In the mortgage portfolio, a significant challenge relates to the low coverage of the real estate market by energy performance certificates, energy prices are regulated (which reduces the economic motivation for thermo-modernisation from the users' perspective) and the substantial part of the carbon footprint is related to emissions generated by systemic heating and electricity generation. An additional difficulty, from the customers' perspective, is the change in the billing system for RES systems.

Regardless of the above-mentioned barriers, in 2024 we acted on the above-mentioned decarbonisation levers and saw an increase in green financing, in line with the internal classification system (data in 'Measures and targets' chapter). It was influenced mainly by the financing of RES, energy efficiency and low-carbon transport (i.a. as a part of 'My Electric Car' programme). The last two areas are a significant component of our clients' cost base, crucial in the face of high inflation and strong competition.

Our focus is on education activities that address needs of customers in the investment decision-making process. These efforts aim to help clients understand the economic benefits of transitioning to a more sustainable business model. The green financing initiatives in the retail and corporate customer segment focused on:

- Commercialising a 'Santander New Energy' platform targeting SME and corporate segment customers. It allows to estimate the carbon footprint and calculate the cost-effectiveness of investments to support the decarbonisation of the main asset classes responsible for generating it in scope 1 and 2, including using public support schemes (assuming their expansion in scope/scale and bankability in the future).
- Delivering a commercial training programme to equip advisors and bankers with the knowledge to have practical discussions with clients on the quantifiable benefits of investing in energy efficient assets and/or upgrading assets to improve operational efficiency and reduce business costs.
- Educational activities for clients. These included a series of podcasts called 'Z nową energią o finansach' (With new energy about finance) and a cycle of nationwide customer meetings focused on demonstrating the business benefits of using the technology in retrofitting corporate assets to reduce emissions, and outlining the future regulatory pressures associated with sustainability that could translate into increased costs of doing business across industries.

In 2024, the Bank offered products to support the economy transition (below). In 2025, the Bank plans to continue and expand these activities, with the exact direction of these activities depending on the launch of a public support programme calibrated to the actual needs of customers.

- Transformation Loan for sustainable investments (Business New Energy):
  - segment: SMEs
  - financing objectives: photovoltaic panels, electric cars, energy storage, EV charging stations, heat pumps.
- Environmental Credit with BGK (loan partially repaid with a subsidy in the form of an ecological bonus paid by Bank Gospodarstwa Krajowego from the European Funds for a Modern Economy 2021-2027 Programme):
  - segment: SMEs, Small-midcaps
  - Financing objectives: the loan is intended to finance expenditure related to the modernisation of infrastructure – to make the company more energy efficient.
- Ekomax Loan – investment loan with BGK guarantee and loan capitalization refund. Intended to finance a modernisation investment, including obligatorily a thermo-modernisation element (unless otherwise indicated by the thermo-modernisation audit) and additionally, among other things, investments related to renewable energy sources, circular economy and construction and replacement of heating systems.

In the Corporate and Investment Banking segment, which includes the largest companies, the Bank supports the country's energy transition by providing financing for the construction of wind farms and photovoltaic installations. The total renewable energy sources (RES) portfolio value at the end of the year amounted to approximately PLN 7.8 billion, of which at least one-third represents project financing. The total capacity of the RES projects we financed in 2024 is 170 MW.

Although financing renewable energy sources is a cornerstone of the energy transition, it is not the only crucial element of this complex process. In addition to direct project finance and green bond issuance, we support our clients through advisory services. We provide guidance in areas such as the purchase and sale of green assets, structuring sustainability-linked loans (SLL), and developing energy transition plans. In 2024, we granted five SLL financings for clients operating in the retail, information technology, transportation and logistics sectors.

For clients operating in high-emission sectors, such as energy, fossil fuels, and aviation, we conduct detailed analyses of greenhouse gas emissions, decarbonization targets, and energy transition plans. Since these sectors are particularly sensitive to climate change, we help our clients understand the opportunities and risks associated with the transition.

We also regularly meet with clients from other sectors. Among other topics, we discuss sustainability-linked financing options, which often include commitments to reduce greenhouse gas emissions. We also address current regulatory requirements, investor expectations, and best market practices.

Environmental considerations, as part of ESG factors, are also integrated into our investment analysis. Within our Group, we see the inclusion of non-financial factors as an opportunity to gain a more comprehensive view of the assets we manage and to make more balanced investment decisions. Our analysis includes aspects such as environmental strategy and management, climate change impact, resource utilization, and pollution prevention

Funds compliant with SFDR

Santander TFI offers investment funds classified as Article 8 of the SFDR (so-called light green) and Article 9 of the SFDR (so-called dark green) products.

As at 31 December 2024, Santander TFI managed 6 such funds:

- 5 sub-funds classified as Article 8 products under SFDR (-light green): Santander Prestiż Global Responsible Investment, Santander Prestiż European Equity, Santander Prestiż Future Wealth and Santander Prestiż Technology and Innovation which are sub-funds of the Santander Prestiż SFIO fund and Santander Equity Growth, sub-fund of the Santander FIO fund.
- 1 sub-fund classified as an Article 9 SFDR product (so-called dark green): Santander Prestiż Prosperity a sub-fund of the Santander Prestiż SFIO fund.

As of 31 December 2024, the share of ESG funds' net assets in the total net assets of investment funds managed by TFIs was 4.4%.

Internal regulations for sustainable finance

Actions described above are in line with the internal classification system and the product commercialisation process. Environmental and climate issues are taken into account in the development of products and services, as well as in credit analysis.

Sustainable Finance and Investment Classification System (SFICS)

Since 2022, we have had an internal methodology within the Santander Bank Polska Group for classifying sustainable financial and investment products and services, in particular describing how we define green, social and sustainable financing. The system applies to financial products, investments and services, among others, and is common to the entire Banco Santander Group. The document is periodically updated to reflect regulatory changes and market practices. The last update in 2024 mainly concerned the inclusion of some of the technical criteria of the EU Taxonomy (with regard to the criteria of material contribution to the environmental goals of the EU Taxonomy). However, it should be noted that SFICS is not identical to the EU Taxonomy. In particular, it does not assume full verification of the 'do no significant harm' (DNSH) and minimum social safeguards (MSS) criteria.

In general, the classification system distinguishes between two types of financing: use-of-proceeds transactions and sustainability-linked transactions. Instruments, products and financial services with a dedicated purpose are those for which it can be guaranteed that 100% or a certain part of the funds from the transaction will be allocated to activities or projects that comply with the guidelines mentioned in the regulation. In order to be categorised as compliant, the financing must relate to a specific sector or economic activity and meet the definitions and technical eligibility criteria specified for them in the SFICS. The SFICS is based on internationally recognised guidelines and industry principles, such as the ICMA Social and Green Bond Principles, Climate Bond Standards and the aforementioned EU Taxonomy.

It defines the scope, criteria, applicable due diligence requirements in the environmental and social fields and the approach to their verification. It serves as a reference point for the creation of sustainable financial products and services.

Tackling greenwashing

To mitigate the risk of greenwashing, we have established an ESG Panel. The task of this working group is to support the Group's business segments in correctly identifying and classifying sustainable credit transactions and products, both in terms of compliance with the criteria of the internal Sustainable Finance and Investment Classification System (SFICS) as well as the EU Taxonomy. The Panel is chaired by the Head of ESG Risks (Risk Management Division) and overseen by the Risk Control Committee at the Bank Management Board level.

Regulations relating to the implementation of new products and services ensure that consultation with the Compliance Department and the Sustainability and ESG Team is required for all ESG-related products and services, including non-credit ones.

With regard to greenwashing risk, further policies, procedures and guidelines are gradually being defined to address this risk, which occurs across all of the Bank's operations. So far:

- we have aligned the approach to defining sustainable transactions and products through the Sustainable Finance and Investment Classification System (SFICS),
- we have developed the 'Sustainability Communication and Advertising' guidelines, applicable to staff preparing marketing and branding messages,
- we have incorporated the risk of greenwashing in the 'Compliance Assurance Area Guidelines for working with partners'.

We are developing 'Greenwashing Management and Control Guidelines' (to be implemented at the beginning of 2025).

Additional information on undertaken actions

This report has been prepared in accordance with ESRS standards for the first time. Due to the fact that this is the first reporting cycle, the Group has not defined a previous base year in relation to which it could disclose the achieved GHG emission reductions. In connection with the described completed or planned activities, the Group does not identify capital expenditures or operating expenses that would be significant in relation to the scale of the entire Group's operations.

2.4. Metrics and targets

Targets related to climate change mitigation and adaptation (E1-4)

Targets and metrics related to climate change mitigation and adaptation depend on the development of the transition plan. Targets and metrics may be set as the transition plan is being developed, in line with the agreed strategy. In particular, the transition plan is crucial for defining GHG emission reduction targets. As at the end of 2024, the Group did not have a transition plan in place and, consequently, did not set targets for reducing GHG emissions from its own operations or those financed as part of the portfolio.

For the environmental area, we set two basic targets (MDR-T) that are linked to the Group’s strategy and policies. They are subject to formal approval processes by the Management Board, periodic verification and updates depending on the market situation and the financial and operational results of the Bank. These objectives have been set on the basis of the knowledge and business experience of the Bank's employees and Management Board and do not refer to specific studies or scientific research.

- Purchased electricity from renewable sources.

  The target is 100% share of electric energy from renewable sources (RES) in Bank’s total electric energy consumption. The target supports the ambition related to the reduction of emissions in scope 1 and 2 (market-based own operations). The target measured is as a percentage of electricity from renewable sources. The starting point was 87% of electric energy from renewable sources in 2023 at the Bank. The target was to achieve 100% renewable electric energy in 2024 and to maintain this performance in subsequent years, currently looking ahead to 2027.

  We currently ensure the purchase of 100% of electric energy for the Bank from renewable sources through direct green energy supply contracts and guarantees of origin for the remainder of consumption. Implementation is monitored on a quarterly basis as part of the strategy implementation progress report delivered to the Management Board and Supervisory Board and as part of the sustainability objectives reporting at the ESG Committee. Implementation of the target is progressing according to plan.

- Volume of financing in line with the internal classification system SFICS

The target relates to the volume of new finance provided according to the criteria of the internal SFICS classification system (as described in the section 'Sustainable Finance and Investment Classification System (SFICS)'). This system comprises financing with dedicated purpose (use of proceeds) and sustainability-linked transactions. This objective supports the redirection of capital to environmentally sustainable projects.

The target is set in accordance with the planning processes applicable at the Bank, at the moment within the 2027 horizon. The target covers customers (downstream), and applies to the Group excluding Santander Consumer Bank which has its own banking licence, which means that it autonomously creates its own operating strategy, including and objectives.

In line with the above assumptions, we have planned to mobilise PLN 31,046 million of new financing according to SFICS in the planning horizon for 2024-2027. In 2024, the volume of new financing according to SFICS amounted to PLN 8,669 million.

Progress is evaluated quarterly in reports presented to the ESG Committee, and presented to the Management Board and the Supervisory Board. The target level is reviewed in annual planning processes, taking into account internal factors such as changes in methodology and external factors, including regulatory changes.

Energy consumption and mix (E1-5)

The following table presents information on the Group's energy consumption during the reporting period.

We calculated the volumes of energy consumed on the basis of consumption data provided by the Group companies (data primarily from invoices from suppliers and meter readings, and in the absence of actual data, consumption estimates). Our renewable energy consumption is attributed to the Group's purchase of guarantees of origin for renewable electric energy issued by energy suppliers.

Energy consumption and energy mix	2024
Fuel consumption from coal and coal products (MWh)	–
Fuel consumption from crude oil and petroleum products (MWh)	32.54
Fuel consumption from natural gas (MWh)	5,919.97
Fuel consumption from other fossil sources (MWh)	0.00
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	123.48
Total fossil energy consumption (MWh)	**7,424.13**
Share of fossil sources in total energy consumption (%)	20%
Consumption from nuclear sources (MWh)	–
Share of consumption from nuclear sources in total energy consumption (%)	–
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	–
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	23,485.76
The consumption of self-generated non-fuel renewable energy (MWh)	32.00
Total renewable energy consumption (MWh)	**23,517.76**
Share of renewable sources in total energy consumption (%)	80%
Total energy consumption (MWh)	**29,437.73**

As a Group, we do not operate in sectors with a significant climate impact, such as mining, coal, cement, steel or other industries associated with intensive fossil fuel consumption.

Gross Scopes 1, 2 and 3 and Total GHG emissions (E1-6)

In the table below, we present information on our carbon footprint in relation to our own operations and the emissions financed within our financial asset portfolios.

Detailed information on the financial asset portfolio is available in the Consolidated Financial Statements of Santander Bank Polska Group for 2024. As of 31 December 2024, the Group held, in particular, a portfolio of net amounts due from customers amounting to PLN 174,776,281 thousand and a portfolio of investment financial assets amounting to PLN 76,912,655 thousand.

Greenhouse gas (GHG) emissions in tonnes CO_2eq	2024
Gross Scope 1 GHG emissions	5,817.57
Gross location-based Scope 2 GHG emissions	21,745.58
Gross market-based Scope 2 GHG emissions	7,163.71
Scope 3 – Category 6 (business travel)	770.39
Scope 3 – Category 7 (employee commuting)	2,062.32
Scope 3 – Category 15 – GHG emissions financed by the Group	14,620,548.48
Total Gross indirect (Scope 3) GHG emissions:	
Group's Total GHG Scope 3 emissions (location-based)	**14,623,381.19**
Group's Total GHG Scope 3 emissions (market-based)	**14,623,381.19**

For the calculation of CO_2 emission levels, we used the Greenhouse Gas Protocol (GHG Protocol) standards, based on the revised version: 'A Corporate Accounting and Reporting Standard Revised Edition, GHG Protocol Scope 2 Guidance Amendment to the GHG Protocol Corporate Standard' and "Corporate Value Chain (Scope 3) Accounting and Reporting Standard, Supplement to the GHG Protocol Corporate Accounting and Reporting Standard" as required by the ESRS. We use the PCAF standard – The Global GHG Accounting and Reporting Standard for the Financial Industry – for portfolio emission disclosures.

The biogenic emissions of Group are generated by the consumption of fuel with biocomponents by its vehicle fleet. We calculated biogenic emissions using indicators published by the Department for Environment, Food and Rural Affairs (DEFRA). In 2024, they amounted to 280.4 tCO_2e due to diesel oil consumption and 8.72 tCO_2e due to gasoline use.

Methodological assumptions used to calculate the carbon footprint for the own operations:

We used emission factors developed by the UK Department for Environment Food & Rural Affairs (DEFRA 2022), the National Centre for Balancing and Emissions Management (KOBiZE) and the Energy Regulatory Authority (URE). We assess these emission factors as published by reliable institutions and suitable for application to the Group's operations. We have also applied these coefficients in previous years and have updated their values accordingly this year. The emission factors used for the calculations do not exclude the emission of gases other than CO_2 (e.g. CH_4 or N_2O), with the exception of the metrics used for Scope 2 for electricity and heat emissions published by KOBiZE and URE respectively (KOBiZE and URE metrics refer to CO_2 only). GHG emissions were calculated using data consolidation based on operational control. The calculations were performed for the entire Group using calculation sheets specifically designed for this purpose.

The following table describes the scope of the emissions calculation, the emission sources and the calculation methodology:

Scope	Emission sources included in the report		Calculation methodology
Scope 1	Leakage of refrigerants	R410A R417A R32	Emissions calculated on the basis of replenishment volume data for R410A, R417A, R32 provided by Santander Group companies and the emission factor obtained from DEFRA 2024 and EPA / Schiessl (R32) databases.
	Emissions from mobile sources	1. diesel 2. petrol	Emissions calculated using diesel oil and petrol consumption data for the transport fleet, provided by Santander Group companies, and an emissions factor obtained from DEFRA 2024.
	Emissions from stationary sources	1. natural gas 2. fuel oil 3. diesel fuel	Emissions calculated using consumption data for heating oil and natural gas for heating, and diesel for emergency generators, and an emissions factor obtained from DEFRA 2022.
Scope 2	Electricity	Offices	Emissions calculated on the basis of electricity consumption data and an emission factor obtained from the KOBiZE. Market-based emissions were calculated from data on the fuel mix of suppliers. Due to the lack of data on suppliers for some of the premises used by Santander, an average indicator determined from available indicators for suppliers of Santander Group companies was used.
	District heating	Offices	Emissions were calculated on the basis of consumption data provided by Group subsidiaries and an emission factor obtained from URE. Market-based emissions calculated from data on the fuel mix of suppliers. Due to the lack of knowledge of suppliers in some of the premises used by Santander, an average indicator determined from available indicators for suppliers Group companies was used.

Scope 3	Business trips	By private car	Emissions were calculated on the basis of consumption data provided by Group subsidiaries (from HR systems to account for business travel) and an emissions factors obtained from DEFRA.
		By bus	Emissions were calculated on the basis of consumption data provided by Group subsidiaries (from HR systems to account for delegations) and an emissions factors obtained from DEFRA.
		By train	Emissions were calculated on the basis of consumption data provided by Group subsidiaries (from HR systems to account for delegations) and an emissions factors obtained from DEFRA.
		Flights	Emissions were calculated on the basis of consumption data provided by Group subsidiaries (from HR systems to account for delegations) and an emissions factors obtained from DEFRA.
	Employee commuting	Employee commuting	Emissions were calculated using data provided Group subsidiaries and emission factors obtained from DEFRA. Data on the distance travelled by employees came from surveys conducted among employees. The surveys were conducted in 2024 (except for Santander Consumer Bank S.A., where the survey was conducted in 2023). On average, 66% of employees took part in the survey.

As a financial institution, the Group is not directly covered by the EU ETS (European Emissions Trading Scheme), therefore the above calculations do not include greenhouse gas emissions from regulated emission trading schemes.

Emissions from the credit portfolio

The table below presents the financed emissions of the Santander Bank Polska Group's portfolio, broken down into business loans, retail loans, and government and corporate bonds. **In business loans**, we disclose emissions related to: general financing of companies and other entities, project financing, commercial real estate and corporate bonds. Definitions of the individual financing categories can be found on the following page. **Retail real estate** refers to mortgage-backed emissions. These categories and their definitions are taken from the PCAF methodology. The PCAF standard also defines a Data Quality Score ranging from 1 (highest) to 5 (lowest), which is applied to each asset class covered by the standard. The Group uses the emission metrics indicated by PCAF, which are expressed as CO_2 equivalents (CO_2e). This means that they include not only the emissions of carbon dioxide (CO_2) itself, but also other greenhouse gases (e.g. methane – CH_4, nitrous oxide – N_2O) converted to their equivalent impact on global warming in relation to CO_2.

The scope of data covered by the calculation for business loans is approximately 98% of the total portfolio, while for mortgage loans it is 96%. The lack of full coverage is due to the exclusion of intangible parts of the balance sheets of subsidiaries and cases of lack of sufficient data in the systems.

Product type	Financed emissions (tCO_2)	Total exposure (PLN million)	Exposure with calculated emissions (PLN million)	Intensity ($kgCO_2$/PLN 1)	Average Data Quality Score
Business loans	9,461,333.02	81,196.52	79,174.23 (98%)	0.120	4.03
Retail real estate	864,869.45	58,509.38	56,044.82 (96%)	0.015	3.91
Government bonds	4,294,346.01	66,831.71	66,831.71 (100%)	0.064	1.00
Total	**14,620,548.48**	**206,537.61**	**202,049.76 (98%)**	**0.072**	**3.09**

The following product types were excluded:

- Listed shares and interests in associated companies (due to the immateriality of the exposure),
- Central bank securities and trading assets (due to the non-investment nature of these products),
- Motor vehicles (leasing under Scope 3, Category 13 of financed emissions)) – a significant portion of the Group's finance leases consists of assets other than cars (e.g., agricultural machinery), for which an emissions calculation methodology has not yet been developed. The Group is actively participating in the work of the Polish Leasing Association on a comprehensive methodology, which, once completed, will enable full disclosure of emissions for this category. At the same time, initial estimates indicate that motor vehicles account for less than 1% of total financed emissions, making this exposure immaterial from an emissions perspective.

Annual emissions are presented in tonnes of CO_2-equivalent (tCO_2e) and converted into PLN per unit of exposure. The calculation includes all three scopes of customer emissions. The exceptions are mortgages and commercial real estate, where only scope 1 and 2 are considered. Depending on the availability of data needed for the calculation, an average Data Quality Score (on a scale of 1-5) is assigned for each category. The level of detail provided depends on the availability of data in the Bank's systems and the extent of actual emission data from customer disclosures.

Methodological assumptions used to calculate the carbon footprint for emissions financed by the portfolio of financial assets:

When calculating financed emissions, we use an internal methodology based on the PCAF standard ('The Global GHG Accounting and Reporting Standard for the Financial Industry'). According to the PCAF standard, GHG emissions associated with loans and investments (category 15) are calculated based on the proportional share of a given loan or investment in the entity that benefits from the financing or is the subject of the investment. The allocation is based on the annual GHG emissions of the borrower or the invested entity for the year 2023.

Financed emissions are always calculated by multiplying the allocation factor (determined separately for each asset class) by the emissions of the borrower or investment entity. This is the proportion of the borrower's or investment entity's total annual greenhouse gas emissions accounted for by a given financing or investment. The allocation factor is calculated by determining the outstanding amount – the outstanding value of the loan or investment – relative to the sum of the equity and liabilities of the entity, project etc. benefiting from the financing or capital investment.

→ **BUSINESS LOANS:**

We disclose emissions related to all loans and credit lines (included in the balance sheet records) to companies, non-profit organisations and any other entities. These loans are not traded on the market and are for general corporate purposes, i.e. with no specified use of the funds, as defined in the GHG Protocol. We include here also emissions from our material corporate bond exposures. The business loans category represents the predominant share of financed emissions.

For this part of the portfolio, estimated emissions are calculated on the basis of data collected from the client's reports (resulting in the highest Data Quality Score = 1) or based on the size of the company (capital and own assets), its revenue and type of business. In the absence of sufficient client information, emissivity is calculated based on the amount of exposure and the client's type of business (lowest Data Quality Score = 5). We are currently working to collect as much emissivity information as possible directly from the client in the future, thus strengthening the relationship and establishing a dialogue to support their transformation. We have implemented a free carbon footprint calculator for small and medium-sized enterprises, which should also support the data collection and reporting process.

This category also includes **financed projects**, i.e., financing (recorded in the balance sheet) for specific investments or activities with a clearly identified use of the funds as defined in the GHG Protocol. For example, this could be the financing of a specific activity or activities, e.g. concerning a wind or photovoltaic farm or an energy efficiency project. Emissions are calculated only for the ring-fenced activities being financed. Emissions and financial data unrelated to the funded project are excluded. This is an important part of our business portfolio due to the significant volume of energy project financing, with a high share of RES projects (around 30% of the total energy portfolio). The data quality score for this category is better than in other categories (2.89) – we assume that the financed GHG emissions from this type of projects (RES) are approximately 0 and treat them as the actual reported emissions from the project.

Another category aggregated under this item includes **commercial real estate (CRE)** loans (recorded in the balance sheet) designated for specific corporate purposes: the purchase and refinancing of commercial real estate (CRE) and balance sheet investments in CRE, where the financial institution does not exercise operational control over the property. According to this definition, the financed property is used for commercial purposes, such as retail and service facilities, hotel, office, industrial, or residential spaces (large multi-family buildings for rental purposes). In all these cases, the property owner utilizes the real estate for profit-generating activities (general construction is outside the scope of CRE). The methodology for estimating emissions is described in the section on retail real estate (below).

→ **RETAIL REAL ESTATE:**

We disclose loans (recorded in the balance sheet) for specific consumer purposes, such as the purchase and refinancing of residential real estate, including single-family houses and multi-family buildings with a small number of flats. This definition indicates that the property is used exclusively for residential purposes and is not used for commercial activities. We disclose here Santander Bank Polska's portfolio, excluding Santander Consumer Bank's mortgage portfolio, under which new loans are no longer granted, the value of which has been gradually decreasing and has been deemed immaterial. At the end of 2024 the mortgage portfolio of Santander Consumer Bank represented 0.01% of the mortgage exposure of the Santander Bank Polska Group. The methodology for calculating emissivity is the same as for commercial real estate. We rely here on the emissivity factors assigned to the type and size of the building from the publicly available PCAF factor database and on information from the energy certificates of buildings.
To improve data quality, we are working towards using emissivity factors assigned to the energy labels of buildings, which are based on primary energy demand. This information is obtained directly from energy performance certificates. Next year, we plan to use a model to estimate emissivity for mortgages where we lack certificates, covering the rest of the portfolio's collateral or commercial real estate.

→ **GOVERNMENT BONDS**

Financed emissions from government bonds include investments in securities issued by national governments and public institutions. For these types of assets, the financial institution does not have direct operational control over how the funds are used. According to the PCAF methodology, emissions attributed to government bonds are estimated based on the total greenhouse gas emissions of a given country's economy and its total debt. The methodology relies on emission intensity factors available in the PCAF database, which provides the highest-quality data (Data Quality Score 1). These data are based on verified annual greenhouse gas emission reports submitted by countries to the UNFCCC. The PCAF database provides emission intensities expressed as annual GHG emissions per unit of a country's international debt, taking into account purchasing power parity-adjusted GDP (PPP-adjusted GDP). The analysis can use emission factors that either include or exclude emissions from land use, land-use change, and forestry (LULUCF).

The figures presented in the table above include emissions related to LULUCF, meaning that financed emissions also reflect the impact of the land use sector on a country's overall emissions balance. Financed emissions values are allocated proportionally to the value of the held bonds relative to the country's total government debt. The category includes also exposures of bonds not directly issued by the Treasury but fully guaranteed by it, which implies an allocation of issuance according to the national issuance profile.

Greenhouse gas intensity based on net revenue

The Group's carbon footprint per unit of net revenue is 0.62 kg CO_2e/1PLN.

GHG intensity per net revenue	
Total greenhouse gas emissions (location-based method) per net revenue (tCO_2-equivalent/monetary unit)	0.00062
Total greenhouse gas emissions (market-based method) per net revenue (tCO_2-equivalent/monetary unit)	0.00062

The denominator assumes the value of consolidated net revenue amounting to PLN 23,440,451 thousand determined in accordance with ESRS 2 as the sum of the following items from the Consolidated Financial Statements of the Santander Bank Polska Group for 2024. Consolidated income statement of the Group: 'Interest income and similar to interest', 'Commission income', 'Dividend income', 'Net profit on shares in affiliates', 'Trading income and revaluation', 'Profit on other financial instruments', 'Profit on discontinued recognition of financial instruments measured at amortized cost' and 'Other operating income', less the value of the result on exchange items in the amount of PLN 375,075 thousand.

Other climate-related disclosures (E1-7, E1-8, E1-9)

As a Group, we do not engage in direct activities related to the removal and storage of greenhouse gases within our own operations or in the value chain. However, in 2024, we purchased 13,658 CER units, which offset 13,657.54 tonnes of CO_2 equivalent emissions. These are an additional environmental measure by the Banco Santander Group, and their purchase does not affect the objectives or activities of the Santander Bank Polska Group in terms of reducing its own emissions or financed emissions. Credits are obtained from two projects that are carried out outside the value chain and outside the European Union. These are reduction projects that are validated by the Gold Standard (GS) and the Verified Carbon Standard (VCS). The purchase of credits for all subsidiaries is coordinated by the Banco Santander Group, which carries out the selection and due diligence process.

We do not apply internal carbon pricing (E1-8).

With respect to disclosures regarding expected financial impacts from significant physical and transition risks and potential climate-related opportunities (E1-9), we have chosen to apply a "phase-in" period and therefore we do not disclose this information in this statement.

Disclosures under Regulation no. 2020/852

EU Taxonomy for sustainable activities

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (EU Taxonomy) lays down a unified classification system for sustainable activities designed to increase the transparency and comparability across the market and support investors in taking investment decisions.

The six environmental objectives of the EU Taxonomy are: climate change mitigation (CCM), climate change adaptation (CCA), sustainable use and protection of water and marine resources (WTR), transition to a circular economy (CE), pollution prevention and control (PPC), and protection and restoration of biodiversity and ecosystems (BIO).

Taxonomy-eligible finance includes exposures financing the objectives or projects related to the activities referred to in Delegated Regulation no. 2021/2139 as amended (Climate Delegated Act), Delegated Regulation no. 2023/2486 (Taxonomy Environmental Delegated Act), irrespective of whether such activities meet the Taxonomy's technical screening criteria for environmental sustainability.

Environmentally sustainable finance, that is Taxonomy-aligned finance, includes exposures financing the objectives or projects related to the activities which meet all the following criteria:

- contribute substantially to at least one of the six environmental objectives;
- do no significant harm to any of the other environmental objectives (DNSH);
- are carried out in compliance with the minimum (social) safeguards.

Activities contribute substantially to an environmental objective and do no significant harm to other environmental objectives if they meet the strict technical screening criteria defined in the above-mentioned delegated acts (Climate Delegated Act or Taxonomy Environmental Delegated Act).

Activities comply with the minimum safeguards if they are carried out in alignment with the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The minimum safeguards require companies to have due diligence processes in place that cover the following topics addressed in the OECD Guidelines for Multinational Enterprises: human rights, employment and industrial relations, environment, combating bribery and other forms of corruption, consumer interests, science and technology, competition and taxation.

Quantitative disclosures

Scope of Taxonomy disclosures

Pursuant to Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 as regards corporate sustainability reporting (CSRD), which replaced the previous Directive on non-financial reporting (NFRD), Santander Bank Polska Group, as a public-interest entity preparing sustainability reports, must disclose information on the percentage share of its portfolio financing environmentally sustainable activities. The content, methodology and presentation of information about environmentally sustainable economic activities are defined in Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021.

In the case of credit institutions, including Santander Bank Polska S.A., the reporting obligations concerning Taxonomy disclosures became fully effective as of 2024 (except for two templates applicable as of 2026) following the two-year transition period.

As part of GAR reporting for 2024, Santander Bank Polska Group conducted a full assessment of transactions in terms of Taxonomy eligibility and Taxonomy alignment with regard to the first two environmental objectives (CCM and CCA) defined in the Climate Delegated Act (as amended). As regards the other four environmental objectives specified in the Taxonomy Environmental Delegated Act, the assessment of transactions as part of reporting for 2024 covered only Taxonomy eligibility, as required under the applicable regulatory schedule.

Summary of KPIs

The key performance indicator for sustainable activities of credit institutions is the green asset ratio (GAR), which represents investments and exposures related to Taxonomy-aligned activities with regard to the six environmental objectives as a proportion of the assets included in the GAR calculation. This ratio covers the main lending and investment activities of credit institutions, including loans and advances, debt securities, and equity instruments in the banking book. It reflects the proportion of a credit institution's assets that finance environmentally sustainable activities.

The GAR numerator includes the following types of exposures and counterparties:

- debt and equity exposures in the banking book for financial or non-financial entities required to make their own Taxonomy disclosures (directly or indirectly as part of the consolidated Taxonomy disclosures of the parent entity).
- loans secured by residential properties, building renovation loans and car loans for households;
- loans for local governments for the purpose of financing housing needs and other specific purpose investments;
- collateral obtained by repossessing residential and commercial properties.

The GAR denominator includes total gross assets excluding exposures to central governments and supranational institutions, exposures to central banks and the trading book.

The table below presents the summary of Taxonomy KPIs of Santander Bank Polska Group for 2024 and the comparative period, providing static (as at the balance sheet date) and dynamic view (flow in the reporting period in respect of active exposures as at the balance sheet date) in two variants for each view. As part of the static view, exposures financing general corporate purposes of entities were assessed on the basis of turnover KPIs published by those entities. The dynamic view is based on capex KPIs. Off-balance sheet exposures (financial guarantees and assets under management) were included as well. The same approach was also applied to other reporting templates published later in this chapter.

The KPIs are presented using template 0 contained in Annex VI to Commission Delegated Regulation (EU) 2021/2178 (as amended).

Summary of KPIs as at 31.12.2024

		Total environmentally sustainable assets (TURNOVER)	Total environmentally sustainable assets (CAPEX)	KPI (TURNOVER)	KPI (CAPEX)	% coverage (over total assets)	% of assets excluded from the numerator of the GAR	% of assets excluded from the denominator of the GAR
Main KPI Green asset ratio (GAR) stock	Green asset ratio (GAR) stock	1,445,912	1,382,353	0.63%	0.60%	73.43%	38.49%	26.57%

		Total environmentally sustainable assets (TURNOVER)	Total environmentally sustainable assets (CAPEX)	KPI (TURNOVER)	KPI (CAPEX)	% coverage (over total assets)	% of assets excluded from the numerator of the GAR	% of assets excluded from the denominator of the GAR
Additional KPIs Green asset ratio (GAR)	Green asset ratio (GAR) flow	574,850	476,829	0.99%	0.66%	79.20%	43.03%	20.80%
	Trading book	n/a	n/a	n/a	n/a			
	Financial guarantees	0.00	0.00	0.00%	0.0%			
	Assets under management	383,377	653,861	1.58%	2.70%			
	Fees and commissions income	n/a	n/a	n/a	n/a			

Summary of KPIs as at 31.12.2023

		Total environmentally sustainable assets (TURNOVER)	Total environmentally sustainable assets (CAPEX)	KPI (TURNOVER)	KPI (CAPEX)	% coverage (over total assets)	% of assets excluded from the numerator of the GAR	% of assets excluded from the denominator of the GAR
Main KPI Green asset ratio (GAR) stock	Green asset ratio (GAR) stock	826,727,422	1,127,250,261	0.38%	0.52%	76.1%	39.30%	23.86%

		Total environmentally sustainable assets (TURNOVER)	Total environmentally sustainable assets (CAPEX)	KPI (TURNOVER)	KPI (CAPEX)	% coverage (over total assets)	% of assets excluded from the numerator of the GAR	% of assets excluded from the denominator of the GAR
Additional KPIs Green asset ratio (GAR)	Green asset ratio (GAR) flow	256,134,838	225,849,521	0.41%	0.36%	85.28%	50.20%	14.72%
	Trading book	n/a	n/a	n/a	n/a			
	Financial guarantees	0.00	0.00	0.00%	0.0%			
	Assets under management	128,785,430	128,785,430	9.6%	9.6%			
	Fees and commissions income	n/a	n/a	n/a	n/a			

Santander Bank Polska Group's assets classified as environmentally sustainable total PLN 1,445,912k by turnover KPI and PLN 1,382,353k by capex KPI. They include:

- PLN 962,234k of mortgage loans for purchase of residential property which meet the EU Taxonomy alignment criteria;
- PLN 174,954k of a credit exposure to a customer from the energy sector related to the electricity generation from wind power, certified internally as Taxonomy-aligned as part of an individual assessment;
- other general purpose loans and advances to NFRD/CSRD customers, calculated as a product of their exposures as at 31 December 2024 and turnover and capex KPIs published by those customers.

Key and partial performance indicators

The tables below present quantitative information reflecting the extent to which the activities of Santander Bank Polska Group are Taxonomy-eligible or Taxonomy-aligned, broken down by six environmental objectives, customer segments and financial instruments.

The quantitative disclosures have been prepared using templates 1–5 contained in Annex VI to Commission Delegated Regulation (EU) 2021/2178 (as amended). The Group does not publish disclosures on fees and commissions income from services other than lending and asset management (template 6) or trading portfolio (template 7). They will become effective and will be reported as of 1 January 2026. Accordingly, the Group does not publish the qualitative disclosure on the trade portfolio referred to in Annex XI to the aforementioned regulation either.

The figures presented in the tables come from the FINREP ITS, i.e. prudentially consolidated financial statements prepared for central banks. Information about customers and products (including leasing and factoring ones in respect of Santander Leasing S.A. and Santander Factoring Sp. z o.o.) which was not available in FINREP ITS was taken from the corporate data warehouse in accordance with the FINREP granularity. The Group also used information from specialised systems of the Business and Corporate Banking Division (BCBD), Corporate and Investment Banking Division (CIBD) and Risk

Management Division, as well as non-financial data from the system developed by Santander Bank Polska S.A. for the purpose of ESG reporting. Lastly, the Group used external databases (ESG BIK and Clarity) to obtain information about customers required to publish non-financial reports and Taxonomy KPIs derived from publicly available annual reports. Total assets presented in the balance sheet templates are reconciled with FINREP ITS.

Data about customers and products of Santander TFI S.A. and Santander Consumer Bank S.A. and its subsidiaries (including Santander Consumer Multirent sp. z o.o. and Stellantis Financial Services Polska sp. z o.o.) were obtained directly from those entities.

Assets for the calculation of GAR by stock as at 31.12.2024 - based on turnover KPIs

Disclosure reference date 31.12.2024

	PLN k	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	108,764,620	54,504,976	1,395,358	174,954	42	18,274	51,141	50,486	0	44,047	20	18	0	6	2,401	17	0	6	52	17	0	6	513	17	0	6	54,559,103	1,445,912	174,954	42	62,345
2	Financial undertakings	6,659,975	387,720	235,170	0	7	7	3,242	2,899	0	6	20	18	0	6	20	17	0	6	19	17	0	6	19	17	0	6	391,039	238,138	0	7	37
3	Credit institutions	6,647,521	387,720	235,170	0	7	7	3,242	2,899	0	6	20	18	0	6	20	17	0	6	19	17	0	6	19	17	0	6	391,039	238,138	0	7	37
4	Loans and advances	84,606	1,000	139	0	7	7	361	18	0	6	20	18	0	6	20	17	0	6	19	17	0	6	19	17	0	6	1,438	226	0	7	37
5	Debt securities, including UoP	6,562,915	386,720	235,031	0	0	0	2,881	2,881	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	389,601	237,912	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	12,454	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
20	Non-financial undertakings	9,594,703	814,115	197,954	174,954	35	18,268	47,898	47,587	0	44,040	0	0	0	0	2,381	0	0	0	32	0	0	0	495	0	0	0	864,922	245,541	174,954	35	62,308
21	Loans and advances	9,594,703	814,115	197,954	174,954	35	18,268	47,898	47,587	0	44,040	0	0	0	0	2,381	0	0	0	32	0	0	0	495	0	0	0	864,922	245,541	174,954	35	62,308
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	Households	92,438,334	53,258,013	962,234	0	0	0	0	0	0	0					0	0	0	0									53,258,013	962,234	0	0	0
25	of which loans collateralised by residential immovable property	52,043,946	51,364,633	962,234	0	0	0	0	0	0	0					0	0	0	0									51,364,633	962,234	0	0	0
26	of which building renovation loans	737,571	737,571	0	0	0	0	0	0	0	0					0	0	0	0									737,571	0	0	0	0
27	of which motor vehicle loans	1,155,808	1,155,808	0	0	0	0																					1,155,808	0	0	0	0
28	Local governments financing	71,609	45,128	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45,128	0	0	0	0
29	Housing financing	1,484	1,484	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	1,484	0		0	0
30	Other local government financing	70,125	43,645	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	43,645	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	119,780,744	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Disclosure reference date 31.12.2024																													
	PLN k	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
33	Financial and Non-financial undertakings	103,856,924																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	72,049,439																														
35	Loans and advances	71,949,645																														
36	of which loans collateralised by commercial immovable property	21,572,182																														
37	of which building renovation loans	501																														
38	Debt securities	27,270																														
39	Equity instruments	72,523																														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,160,321																														
41	Loans and advances	1,150,455																														
42	Debt securities	1,247																														
43	Equity instruments	8,619																														
44	Derivatives	1,401,753																														
45	On demand interbank loans	2,195,369																														
46	Cash and cash-related assets	1,226,432																														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	11,100,267																														
48	Total GAR assets	228,545,364	54,504,976	1,395,358	174,954	42	18,274	51,141	50,486	0	44,047	20	18	0	6	2,401	17	0	6	52	17	0	6	513	17	0	6	54,559,103	1,445,912	174,954	42	62,345
49	Assets not covered for GAR calculation	82,684,345																														
50	Central governments and Supranational issuers	56,793,626																														
51	Central banks exposure	15,344,299																														
52	Trading book	10,546,421																														
53	Total assets	311,229,710	54,504,976	1,395,358	174,954	42	18,274	51,141	50,486	0	44,047	20	18	0	6	2,401	17	0	6	52	17	0	6	513	17	0	6	54,559,103	1,445,912	174,954	42	62,345
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	218,144	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	24,188,345	1,783,253	328,698	174,512	6,907	147,279	302,258	53,696	46,404	7,293	533	463	455	8	277,529	338	126	211	79,079	182	182	0	4,471	0	0	0	2,447,123	383,377	221,679	6,907	154,791
56	Of which debt securities	20,237,146	1,159,565	249,800	160,308	1,843	87,649	139,653	6,298	5,864	434	114	48	40	8	43,824	313	125	188	55,297	179	179	0	3,558	0	0	0	1,402,011	256,638	166,516	1,843	88,279
57	Of which equity instruments	3,848,746	623,687	78,897	14,203	5,064	59,630	162,605	47,398	40,540	6,858	418	415	415	0	233,705	25	2	23	23,782	2	2	0	912	0	0	0	1,045,109	126,737	55,162	5,064	66,511

Assets for the calculation of GAR by stock as at 31.12.2023 - based on turnover KPIs

		Disclosure reference date 31.12.2023																														
	PLN k	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	104,042,038	55,366,053	826,727	0	2	54,604	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	55,366,053	826,727	0	2	54,604
2	Financial undertakings	11,765,209	2,437,189	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,437,189	0	0	0	0
3	Credit institutions	11,730,707	2,437,016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,437,016	0	0	0	0
4	Loans and advances	11,210,991	2,208,341	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,208,341	0	0	0	0
5	Debt securities, including UoP	519,716	228,675	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	228,675	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
7	Other financial corporations	34,501	173	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	173	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
12	of which management companies	2,179	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0	0
13	Loans and advances	2,179	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
16	of which insurance undertakings	32,323	162	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	162	0	0	0	0
17	Loans and advances	32,323	162	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	162	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
20	Non-financial undertakings	5,758,051	819,146	82,472	0	2	54,604	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	819,146	82,472	0	2	54,604
21	Loans and advances	5,758,051	819,146	82,472	0	2	54,604	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	819,146	82,472	0	2	54,604
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	Households	86,413,599	52,109,718	744,256	0	0	0	0	0	0	0					0	0	0	0									52,109,718	744,256	0	0	0
25	of which loans collateralised by residential immovable property	50,439,911	50,439,911	285,200	0	0	0	0	0	0	0					0	0	0	0									50,439,911	285,200	0	0	0
26	of which building renovation loans	743,558	743,558	459,055	0	0	0	0	0	0	0					0	0	0	0									743,558	459,055	0	0	0
27	of which motor vehicle loans	926,250	926,250	0	0	0	0																					926,250	0	0	0	0
28	Local governments financing	105,180	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	92,241	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
30	Other local government financing	12,939	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	110,980,826	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0
33	Financial and Non-financial undertakings	95,459,227																														

	Disclosure reference date 31.12.2023																															
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
	PLN k	Total gross carrying amount	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	95,134,773																														
35	Loans and advances	80,478,214																														
36	of which loans collateralised by commercial immovable property	0																														
37	of which building renovation loans	0																														
38	Debt securities	14,385,278																														
39	Equity instruments	271,281																														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	324,454																														
41	Loans and advances	308,764																														
42	Debt securities	4,011																														
43	Equity instruments	11,679																														
44	Derivatives	1,575,056																														
45	On demand interbank loans	2,019,785																														
46	Cash and cash-related assets	2,609,876																														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	9,316,882																														
48	Total GAR assets	215,022,864																														
49	Assets not covered for GAR calculation	67,379,900																														
50	Central governments and Supranational issuers	46,276,174																														
51	Central banks exposure	12,054,012																														
52	Trading book	9,049,714																														
53	Total assets	282,402,764																														
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	22,197	188	0	0	0	0	0	0	0	0	188	0	0	0	0	22,197	188	0	0	0	0	0	0	0	0	188	0	0	0	0	22,197
55	Assets under management	19,188,939	1,112,753	128,715	0	12,969	115,746	228,163	71	0	71	1,340,916	128,785	0	12,969	115,817	19,188,939	1,112,753	128,715	0	12,969	115,746	228,163	71	0	71	1,340,916	128,785	0	12,969	115,817	19,188,939
56	Of which debt securities	15,530,810	683,442	63,402	0	6,965	56,437	149,502	62	0	62	832,945	63,464	0	6,965	56,499	15,530,810	683,442	63,402	0	6,965	56,437	149,502	62	0	62	832,945	63,464	0	6,965	56,499	15,530,810
57	Of which equity instruments	3,652,406	436,933	65,780	0	6,048	59,732	79,556	9	0	9	516,489	65,789	0	6,048	59,741	3,652,406	436,933	65,780	0	6,048	59,732	79,556	9	0	9	516,489	65,789	0	6,048	59,741	3,652,406

Assets for the calculation of GAR by stock as at 31.12.2024 - based on CapEx KPIs

	PLN k	Disclosure reference date 31.12.2024																														
		Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	108,764,620	54,540,147	1,300,199	174,954	49,841	43,982	65,569	32,236	0	3,948	30	27	0	9	7,345	26	0	9	120	25	0	9	163,011	49,841	0	9	54,776,223	1,382,353	174,954	49,841	47,966
2	Financial undertakings	6,659,975	1,010	148	0	10	10	371	27	0	10	30	27	0	9	29	26	0	9	29	25	0	9	148	10	0	9	1,618	263	0	10	56
3	Credit institutions	6,647,521	1,010	148	0	10	10	371	27	0	10	30	27	0	9	29	26	0	9	29	25	0	9	148	10	0	9	1,618	263	0	10	56
4	Loans and advances	84,606	1,010	148	0	10	10	371	27	0	10	30	27	0	9	29	26	0	9	29	25	0	9	148	10	0	9	1,618	263	0	10	56
5	Debt securities, including UoP	6,562,915	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	12,454	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
20	Non-financial undertakings	9,594,703	1,235,996	337,817	174,954	49,831	43,972	65,198	32,209	0	3,939	0	0	0	0	7,316	0	0	0	91	0	0	0	162,863	49,831	0	0	1,471,464	419,857	174,954	49,831	47,910
21	Loans and advances	9,594,703	1,235,996	337,817	174,954	49,831	43,972	65,198	32,209	0	3,939	0	0	0	0	7,316	0	0	0	91	0	0	0	162,863	49,831	0	0	1,471,464	419,857	174,954	49,831	47,910
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	Households	92,438,334	53,258,013	962,234	0	0	0	0	0	0	0				0	0	0	0	0									53,258,013	962,234	0	0	0
25	of which loans collateralised by residential immovable property	52,043,946	51,364,633	962,234	0	0	0	0	0	0	0					0	0	0	0									51,364,633	962,234	0	0	0
26	of which building renovation loans	737,571	737,571	0	0	0	0	0	0	0	0					0	0	0	0									737,571	0	0	0	0
27	of which motor vehicle loans	1,155,808	1,155,808	0	0	0	0																					1,155,808	0	0	0	0
28	Local governments financing	71,609	45,128	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45,128	0	0	0	0
29	Housing financing	1,484	1,484	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,484	0	0	0	0
30	Other local government financing	70,125	43,645	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	43,645	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	119,780,744	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0
33	Financial and Non-financial undertakings	103,856,924																														

Disclosure reference date 31.12.2024																															
PLN k	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	72,049,439																														
35 Loans and advances	71,949,645																														
36 of which loans collateralised by commercial immovable property	21,572,182																														
37 of which building renovation loans	501																														
38 Debt securities	27,270																														
39 Equity instruments	72,523																														
40 Non-EU country counterparties not subject to NFRD disclosure obligations	1,160,321																														
41 Loans and advances	1,150,455																														
42 Debt securities	1,247																														
43 Equity instruments	8,619																														
44 Derivatives	1,401,753																														
45 On demand interbank loans	2,195,369																														
46 Cash and cash-related assets	1,226,432																														
47 Other categories of assets (e.g. Goodwill, commodities etc.)	11,100,267																														
48 Total GAR assets	228,545,364	54,540,147	1,300,199	174,954	49,841	43,982	65,569	32,236	0	3,948	30	27	0	9	7,345	26	0	9	120	25	0	9	163,011	49,841	0	9	54,776,223	1,382,353	174,954	49,841	47,966
49 Assets not covered for GAR calculation	82,684,345																														
50 Central governments and Supranational issuers	56,793,626																														
51 Central banks exposure	15,344,299																														
52 Trading book	10,546,421																														
53 Total assets	311,229,710	54,540,147	1,300,199	174,954	49,841	43,982	65,569	32,236	0	3,948	30	27	0	9	7,345	26	0	9	120	25	0	9	163,011	49,841	0	9	54,776,223	1,382,353	174,954	49,841	47,966
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54 Financial guarantees	218,144	12,408	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12,408	0	0	0	0
55 Assets under management	24,188,345	1,743,789	597,594	224,868	38,739	333,987	151,814	55,103	52,975	2,128	1,045	685	682	3	8,173	217	143	74	43,671	261	261	0	2,322	1	1	0	1,950,814	653,861	278,930	38,739	336,192
56 Of which debt securities	20,237,146	1,224,257	405,538	146,656	18,891	239,991	49,969	6,869	6,832	36	343	19	16	3	7,781	213	141	72	41,732	256	256	0	2,148	0	0	0	1,326,230	412,895	153,901	18,891	240,102
57 Of which equity instruments	3,848,746	519,532	192,055	78,212	19,848	93,995	101,844	48,234	46,142	2,092	702	666	666	0	392	4	2	2	1,939	5	5	0	173	1	1	0	624,582	240,965	125,028	19,848	96,089

Assets for the calculation of GAR by stock as at 31.12.2023- based on CapEx KPIs

Disclosure reference date 31.12.2023

	PLN k	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	104,042,038	56,212,008	1,127,250	0	9,087	235,855	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	56,212,008	1,127,250	0	9,087	235,855
2	Financial undertakings	11,765,209	2,381,289	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,381,289	0	0	0	0
3	Credit institutions	11,730,707	2,380,977	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,380,977	0	0	0	0
4	Loans and advances	11,210,991	2,152,302	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,152,302	0	0	0	0
5	Debt securities, including UoP	519,716	228,675	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	228,675	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
7	Other financial corporations	34,501	312	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	312	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
12	of which management companies	2,179	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	21	0	0	0	0
13	Loans and advances	2,179	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	21	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
16	of which insurance undertakings	32,323	291	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	291	0	0	0	0
17	Loans and advances	32,323	291	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	291	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0			0	0		0	0
20	Non-financial undertakings	5,758,051	1,721,001	382,994	0	9,087	235,855	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,721,001	382,994	0	9,087	235,855
21	Loans and advances	5,758,051	1,721,001	382,994	0	9,087	235,855	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,721,001	382,994	0	9,087	235,855
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	Households	86,413,599	52,109,718	744,256	0	0	0	0	0	0	0					0	0	0	0									52,109,718	744,256	0	0	0
25	of which loans collateralised by residential immovable property	50,439,911	50,439,911	285,200	0	0	0	0	0	0	0					0	0	0	0									50,439,911	285,200	0	0	0
26	of which building renovation loans	743,558	743,558	459,055	0	0	0	0	0	0	0					0	0	0	0									743,558	459,055	0	0	0
27	of which motor vehicle loans	926,250	926,250	0	0	0	0																					926,250	0	0	0	0
28	Local governments financing	105,180	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	92,241	0	0		0	0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0	0		0	0
30	Other local government financing	12,939	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	110,980,826	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	Financial and Non-financial undertakings	95,459,227																														

Disclosure reference date 31.12.2023

	PLN k	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	95,134,773																													
35	Loans and advances	80,478,214																													
36	of which loans collateralised by commercial immovable property	0																													
37	of which building renovation loans	0																													
38	Debt securities	14,385,278																													
39	Equity instruments	271,281																													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	324,454																													
41	Loans and advances	308,764																													
42	Debt securities	4,011																													
43	Equity instruments	11,679																													
44	Derivatives	1,575,056																													
45	On demand interbank loans	2,019,785																													
46	Cash and cash-related assets	2,609,876																													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	9,316,882																													
48	Total GAR assets	215,022,864																													
49	Assets not covered for GAR calculation	67,379,900																													
50	Central governments and Supranational issuers	46,276,174																													
51	Central banks exposure	12,054,012																													
52	Trading book	9,049,714																													
53	Total assets	282,402,764																													
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																														
54	Financial guarantees	22,197	188	0	0	0	0	0	0	0	0	188	0	0	0	0	22,197	188	0	0	0	0	0	0	0	0	188	0	0	0	0	22,197
55	Assets under management	19,188,939	1,112,753	128,715	0	12,969	115,746	228,163	71	0	71	1,340,916	128,785	0	12,969	115,817	19,188,939	1,112,753	128,715	0	12,969	115,746	228,163	71	0	71	1,340,916	128,785	0	12,969	115,817	19,188,939
56	Of which debt securities	15,530,810	683,442	63,402	0	6,965	56,437	149,502	62	0	62	832,945	63,464	0	6,965	56,499	15,530,810	683,442	63,402	0	6,965	56,437	149,502	62	0	62	832,945	63,464	0	6,965	56,499	15,530,810
57	Of which equity instruments	3,652,406	436,933	65,780	0	6,048	59,732	79,556	9	0	9	516,489	65,789	0	6,048	59,741	3,652,406	436,933	65,780	0	6,048	59,732	79,556	9	0	9	516,489	65,789	0	6,048	59,741	3,652,406

GAR sector information as at 31.12.2024- based on turnover KPIs

	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL			
		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
		PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable	PLN k	of which environmentally sustainable
1	20.14 - Manufacture of other organic basic chemicals	347	0			0	0			0	0			0	0			0	0			0	0			347	0		
2	20.15 - Manufacture of fertilisers and nitrogen compounds	457,715	0			0	0			0	0			0	0			0	0			0	0			457,715	0		
3	22.19 - Manufacture of other rubber products	4,937	0			0	0			0	0			0	0			0	0			0	0			4,937	0		
4	22.22 - Manufacture of plastic packing goods	34,494	0			0	0			0	0			34,494	0			0	0			0	0			34,494	0		
5	25.11 - Manufacture of metal structures and parts of structures	17,039	0			0	0			0	0			0	0			0	0			0	0			17,039	0		
6	27.12 - Manufacture of electricity distribution and control apparatus	5,123	0			0	0			0	0			5,123	0			0	0			0	0			5,123	0		
7	27.51 - Manufacture of electric domestic appliances	533	0			0	0			0	0			533	0			0	0			0	0			533	0		
8	28.12 - Manufacture of fluid power equipment	6,143	0			0	0			0	0			0	0			0	0			0	0			6,143	0		
9	28.21 - Manufacture of ovens, furnaces and furnace burners	9,802	0			0	0			0	0			0	0			0	0			0	0			9,802	0		
10	29.31 - Manufacture of electrical and electronic equipment for motor vehicles	7,818	5,680			0	0			0	0			0	0			0	0			0	0			7,818	5,680		
11	30.20 - Manufacture of railway locomotives and rolling stock	18	0			0	0			0	0			0	0			0	0			0	0			18	0		
12	35.11 - Production of electricity	216,979	175,035			0	0			0	0			0	0			0	0			0	0			216,979	175,035		
13	35.13 - Distribution of electricity	1,029,035	0			0	0			0	0			0	0			0	0			0	0			1,029,035	0		
14	38.11 - Collection of non-hazardous waste	2,403	889			0	0			0	0			2,403	0			0	0			0	0			2,403	889		
15	38.21 - Treatment and disposal of non-hazardous waste	2,447	905			0	0			0	0			2,447	0			2,447	0			0	0			2,447	905		
16	41.10 - Realization of building projects related to erection of buildings	25,053	0			0	0			0	0			25,053	0			0	0			0	0			25,053	0		
17	41.20 - Building works related to erection of residential and non-residential buildings	50	0			0	0			0	0			50	0			0	0			0	0			50	0		
18	42.11 - Works related to construction of roads and motorways	55,959	70			0	0			0	0			55,959	0			0	0			0	0			55,959	70		
19	46.35 - Wholesale of tobacco products	0	0			0	0			0	0			85,575	0			0	0			0	0			85,575	0		
20	46.42 - Wholesale of clothing and footwear	0	0			0	0			0	0			238,848	0			0	0			0	0			238,848	0		
21	46.46 - Wholesale of pharmaceutical goods	0	0			0	0			0	0			53,306	0			0	0			0	0			53,306	0		
22	46.69 - Wholesale of other machinery and equipment	0	0			0	0			0	0			13,748	0			0	0			0	0			13,748	0		
23	46.90 - Non-specialised wholesale trade	0	0			0	0			0	0			641,306	0			0	0			0	0			641,306	0		
24	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	0	0			0	0			0	0			75	0			0	0			0	0			75	0		
25	47.41 - Retail sale of computers, peripheral units and software in specialised stores	0	0			0	0			0	0			37,018	0			0	0			0	0			37,018	0		
26	47.71 - Retail sale of clothing in specialised stores	0	0			0	0			0	0			801,133	0			0	0			0	0			801,133	0		
27	47.72 - Retail sale of footwear and leather goods in specialised stores	0	0			0	0			0	0			37,039	0			0	0			0	0			37,039	0		
28	47.91 - Retail sale via mail order houses or via Internet	0	0			0	0			0	0			3,476	0			0	0			0	0			3,476	0		
29	61.10 - Wired telecommunications activities	169,212	0			0	0			0	0			169,212	0			0	0			0	0			169,212	0		
30	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	1,195,449	0			0	0			0	0			1,195,449	0			0	0			0	0			1,195,449	0		
31	61.30 - Satellite telecommunications activities	182,735	5,957			0	0			0	0			182,735	0			0	0			0	0			182,735	5,957		
32	63.12 - Web portals	0	0			0	0			0	0			71,844	0			0	0			0	0			71,844	0		

Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
	PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable	PLN k	of which environmentally sustainable
33 68.10 - Buying and selling of own real estate	75,448	702			0	0			0	0			0	0			0	0			0	0			75,448	702		
34 68.20 - Rental and operating of own or leased real estate	52,856	0			0	0			0	0			0	0			0	0			0	0			52,856	0		
35 71.12 - Engineering activities and related technical consultancy	11,190	0			11,190	0			0	0			0	0			11,190	0			0	0			11,190	0		
36 77.11 - Rental and leasing of cars and light motor vehicles	46,698	0			0	0			0	0			46,698	0			0	0			0	0			46,698	0		
37 77.12 - Rental and leasing of other motor vehicle, excluding motorcycles	200,006	0			0	0			0	0			200,006	0			0	0			0	0			200,006	0		

GAR sector information as at 31.12.2024- based on CapEx KPIs

	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL			
		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
		PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable	PLN k	of which environmentally sustainable
1	20.14 - Manufacture of other organic basic chemicals	347	0			0	0			0	0			0	0			0	0			0	0			347	0		
2	20.15 - Manufacture of fertilisers and nitrogen compounds	457,715	0			0	0			0	0			0	0			0	0			0	0			457,715	0		
3	22.19 - Manufacture of other rubber products	4,937	0			0	0			0	0			0	0			0	0			0	0			4,937	0		
4	22.22 - Manufacture of plastic packing goods	34,494	0			0	0			0	0			34,494	0			0	0			0	0			34,494	0		
5	25.11 - Manufacture of metal structures and parts of structures	17,039	0			0	0			0	0			0	0			0	0			0	0			17,039	0		
6	27.12 - Manufacture of electricity distribution and control apparatus	5,123	0			0	0			0	0			5,123	0			0	0			0	0			5,123	0		
7	27.51 - Manufacture of electric domestic appliances	533	0			0	0			0	0			533	0			0	0			0	0			533	0		
8	28.12 - Manufacture of fluid power equipment	6,143	0			0	0			0	0			0	0			0	0			0	0			6,143	0		
9	28.21 - Manufacture of ovens, furnaces and furnace burners	9,802	0			0	0			0	0			0	0			0	0			0	0			9,802	0		
10	29.31 - Manufacture of electrical and electronic equipment for motor vehicles	7,818	6,909			0	0			0	0			0	0			0	0			0	0			7,818	6,909		
11	30.20 - Manufacture of railway locomotives and rolling stock	18	0			0	0			0	0			0	0			0	0			0	0			18	0		
12	35.11 - Production of electricity	216,979	175,704			0	0			0	0			0	0			0	0			0	0			216,979	175,704		
13	35.13 - Distribution of electricity	1,029,035	0			0	0			0	0			0	0			0	0			0	0			1,029,035	0		
14	38.11 - Collection of non-hazardous waste	2,403	1,081			0	0			0	0			2,403	0			0	0			0	0			2,403	1,081		
15	38.21 - Treatment and disposal of non-hazardous waste	2,447	1,101			0	0			0	0			2,447	0			2,447	0			0	0			2,447	1,101		
16	41.10 - Realization of building projects related to erection of buildings	25,053	0			0	0			0	0			25,053	0			0	0			0	0			25,053	0		
17	41.20 - Building works related to erection of residential and non-residential buildings	50	0			0	0			0	0			50	0			0	0			0	0			50	0		
18	42.11 - Works related to construction of roads and motorways	55,959	85			0	0			0	0			55,959	0			0	0			0	0			55,959	85		
19	46.35 - Wholesale of tobacco products	0	0			0	0			0	0			85,575	0			0	0			0	0			85,575	0		
20	46.42 - Wholesale of clothing and footwear	0	0			0	0			0	0			238,848	0			0	0			0	0			238,848	0		
21	46.46 - Wholesale of pharmaceutical goods	0	0			0	0			0	0			53,306	0			0	0			0	0			53,306	0		
22	46.69 - Wholesale of other machinery and equipment	0	0			0	0			0	0			13,748	0			0	0			0	0			13,748	0		
23	46.90 - Non-specialised wholesale trade	0	0			0	0			0	0			641,306	0			0	0			0	0			641,306	0		
24	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	0	0			0	0			0	0			75	0			0	0			0	0			75	0		
25	47.41 - Retail sale of computers, peripheral units and software in specialised stores	0	0			0	0			0	0			37,018	0			0	0			0	0			37,018	0		
26	47.71 - Retail sale of clothing in specialised stores	0	0			0	0			0	0			801,133	0			0	0			0	0			801,133	0		
27	47.72 - Retail sale of footwear and leather goods in specialised stores	0	0			0	0			0	0			37,039	0			0	0			0	0			37,039	0		
28	47.91 - Retail sale via mail order houses or via Internet	0	0			0	0			0	0			3,476	0			0	0			0	0			3,476	0		
29	61.10 - Wired telecommunications activities	169,212	0			0	0			0	0			169,212	0			0	0			0	0			169,212	0		
30	61.20 - Wireless telecommunications activities, excluding satellite telecommunications activities	1,195,449	0			0	0			0	0			1,195,449	0			0	0			0	0			1,195,449	0		
31	61.30 - Satellite telecommunications activities	182,735	23,993			0	0			0	0			182,735	0			0	0			0	0			182,735	23,993		
32	63.12 - Web portals	0	0			0	0			0	0			71,844	0			0	0			0	0			71,844	0		

Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
	PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCM)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (CCA)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (WMR)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (CE)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (PPC)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable (BIO)	PLN k	of which environmentally sustainable	PLN k	of which environmentally sustainable
33 68.10 - Buying and selling of own real estate	75,448	30,117			0	0			0	0			0	0			0	0			0	0			75,448	30,117		
34 68.20 - Rental and operating of own or leased real estate	52,856	0			0	0			0	0			0	0			0	0			0	0			52,856	0		
35 71.12 - Engineering activities and related technical consultancy	11,190	0			11,190	0			0	0			0	0			11,190	0			0	0			11,190	0		
36 77.11 - Rental and leasing of cars and light motor vehicles	46,698	0			0	0			0	0			46,698	0			0	0			0	0			46,698	0		
37 77.12 - Rental and leasing of other motor vehicle, excluding motorcycles	200,006	0			0	0			0	0			200,006	0			0	0			0	0			200,006	0		

GAR KPI stock as at 31.12.2024 - based on turnover KPIs

	% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	50.11%	1.28%	0.16%	0.00%	0.02%	0.05%	0.05%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	50.16%	1.33%	0.16%	0.00%	0.06%	34.95%
2	Financial undertakings	5.82%	3.53%	0.00%	0.00%	0.00%	0.05%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.87%	3.58%	0.00%	0.00%	0.00%	2.14%
3	Credit institutions	5.83%	3.54%	0.00%	0.00%	0.00%	0.05%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.88%	3.58%	0.00%	0.00%	0.00%	2.14%
4	Loans and advances	1.18%	0.16%	0.00%	0.01%	0.01%	0.43%	0.02%	0.00%	0.01%	0.02%	0.02%	0.00%	0.01%	0.02%	0.02%	0.00%	0.01%	0.02%	0.02%	0.00%	0.01%	0.02%	0.02%	0.00%	0.01%	1.70%	0.27%	0.00%	0.01%	0.04%	0.03%
5	Debt securities, including UoP	5.89%	3.58%	0.00%	0.00%	0.00%	0.04%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.94%	3.63%	0.00%	0.00%	0.00%	2.11%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	8.49%	2.06%	1.82%	0.00%	0.19%	0.50%	0.50%	0.00%	0.46%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	9.01%	2.56%	1.82%	0.00%	0.65%	3.08%
21	Loans and advances	8.49%	2.06%	1.82%	0.00%	0.19%	0.50%	0.50%	0.00%	0.46%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	9.01%	2.56%	1.82%	0.00%	0.65%	3.08%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
24	Households	57.61%	1.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									57.61%	1.04%	0.00%	0.00%	0.00%	29.70%
25	of which loans collateralised by residential immovable property	98.69%	1.85%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									98.69%	1.85%	0.00%	0.00%	0.00%	16.72%
26	of which building renovation loans	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									100.00%	0.00%	0.00%	0.00%	0.00%	0.24%
27	of which motor vehicle loans	100.00%	0.00%	0.00%	0.00%	0.00%																					100.00%	0.00%	0.00%	0.00%	0.00%	0.37%
28	Local governments financing	63.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	63.02%	0.00%	0.00%	0.00%	0.00%	0.02%
29	Housing financing	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	62.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	62.24%	0.00%	0.00%	0.00%	0.00%	0.02%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	23.85%	0.61%	0.08%	0.00%	0.01%	0.02%	0.02%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	23.87%	0.63%	0.08%	0.00%	0.03%	73.43%

GAR KPI stock as at 31.12.2023 - based on turnover KPIs

% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL					Proportion of total assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	53.2%	0.8%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	53.2%	0.8%	0.0%	0.0%	0.1%	36.8%
2 Financial undertakings	20.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.7%	0.0%	0.0%	0.0%	0.0%	4.2%
3 Credit institutions	20.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.8%	0.0%	0.0%	0.0%	0.0%	4.2%
4 Loans and advances	19.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	19.7%	0.0%	0.0%	0.0%	0.0%	4.0%
5 Debt securities, including UoP	44.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	44.0%	0.0%	0.0%	0.0%	0.0%	0.2%
6 Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
7 Other financial corporations	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%
8 of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9 Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10 Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11 Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
12 of which management companies	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%
13 Loans and advances	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%
14 Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15 Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
16 of which insurance undertakings	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%
17 Loans and advances	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%
18 Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19 Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
20 Non-financial undertakings	14.2%	1.4%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.2%	1.4%	0.0%	0.0%	0.9%	2.0%
21 Loans and advances	14.2%	1.4%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.2%	1.4%	0.0%	0.0%	0.9%	2.0%
22 Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23 Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
24 Households	60.3%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%									60.3%	0.9%	0.0%	0.0%	0.0%	30.6%
25 of which loans collateralised by residential immovable property	100.0%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%									100.0%	0.6%	0.0%	0.0%	0.0%	17.9%
26 of which building renovation loans	100.0%	61.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%									100.0%	61.7%	0.0%	0.0%	0.0%	0.3%
27 of which motor vehicle loans	100.0%	0.0%	0.0%	0.0%	0.0%																					100.0%	0.0%	0.0%	0.0%	0.0%	0.3%
28 Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29 Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30 Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

GAR KPI stock as at 31.12.2024 -based on CapEx KPI

#	% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	50.15%	1.20%	0.16%	0.05%	0.04%	0.06%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15%	0.05%	0.00%	0.00%	50.36%	1.27%	0.16%	0.05%	0.04%	34.95%
2	Financial undertakings	0.02%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	2.14%
3	Credit institutions	0.02%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	2.14%
4	Loans and advances	1.19%	0.17%	0.00%	0.01%	0.01%	0.44%	0.03%	0.00%	0.01%	0.04%	0.03%	0.00%	0.01%	0.03%	0.03%	0.00%	0.01%	0.03%	0.03%	0.00%	0.01%	0.17%	0.01%	0.00%	0.01%	1.91%	0.31%	0.00%	0.01%	0.07%	0.03%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.11%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	12.88%	3.52%	1.82%	0.52%	0.46%	0.68%	0.34%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.70%	0.52%	0.00%	0.00%	15.34%	4.38%	1.82%	0.52%	0.50%	3.08%
21	Loans and advances	12.88%	3.52%	1.82%	0.52%	0.46%	0.68%	0.34%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.70%	0.52%	0.00%	0.00%	15.34%	4.38%	1.82%	0.52%	0.50%	3.08%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
24	Households	57.61%	1.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									57.61%	1.04%	0.00%	0.00%	0.00%	29.70%
25	of which loans collateralised by residential immovable property	98.69%	1.85%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									98.69%	1.85%	0.00%	0.00%	0.00%	16.72%
26	of which building renovation loans	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									100.00%	0.00%	0.00%	0.00%	0.00%	0.24%
27	of which motor vehicle loans	100.00%	0.00%	0.00%	0.00%	0.00%																					100.00%	0.00%	0.00%	0.00%	0.00%	0.37%
28	Local governments financing	63.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	63.02%	0.00%	0.00%	0.00%	0.00%	0.02%
29	Housing financing	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	62.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	62.24%	0.00%	0.00%	0.00%	0.00%	0.02%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	23.86%	0.57%	0.08%	0.02%	0.02%	0.03%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	0.02%	0.00%	0.00%	23.97%	0.60%	0.08%	0.02%	0.02%	73.43%

GAR KPI stock as at 31.12.2023 -based on CapEx KPI

	% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	54.0%	1.1%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	54%	1%	0.0%	0.0%	0.0%	37%
2	Financial undertakings	20.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	4%
3	Credit institutions	20.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	4%
4	Loans and advances	19.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	19%	0.0%	0.0%	0.0%	0.0%	4%
5	Debt securities, including UoP	44.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	44%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Other financial corporations	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
12	of which management companies	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
16	of which insurance undertakings	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
20	Non-financial undertakings	29.9%	6.7%	0.0%	0.2%	4.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	30.0%	7%	0.0%	0.0%	4%	2%
21	Loans and advances	29.9%	6.7%	0.0%	0.2%	4.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	30.0%	7%	0.0%	0.0%	4%	2%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%
24	Households	60.3%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%									60.0%	1%	0.0%	0.0%	0.0%	31%
25	of which loans collateralised by residential immovable property	100.0%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%									100.0%	1%	0.0%	0.0%	0.0%	18%
26	of which building renovation loans	100.0%	61.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%					0.0%	0.0%	0.0%	0.0%									100.0%	62%	0.0%	0.0%	0.0%	0.0%
27	of which motor vehicle loans	100.0%	0.0%	0.0%	0.0%	0.0%																					100.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	Local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

GAR KPI flow as at 31.12.2024 - based on turnover KPIs

	% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	30.92%	1.97%	0.00%	0.00%	0.06%	0.19%	0.19%	0.00%	0.15%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.13%	2.16%	0.00%	0.00%	0.22%	36.17%
2	Financial undertakings	5.40%	3.21%	0.00%	0.00%	0.12%	0.39%	0.39%	0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.82%	3.60%	0.00%	0.00%	0.42%	9.25%
3	Credit institutions	5.89%	3.58%	0.00%	0.00%	0.00%	0.04%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.94%	3.63%	0.00%	0.00%	0.00%	7.96%
4	Loans and advances	1.00%	0.88%	0.00%	0.32%	0.31%	0.98%	0.86%	0.00%	0.31%	0.96%	0.85%	0.00%	0.30%	0.94%	0.83%	0.00%	0.29%	0.92%	0.81%	0.00%	0.29%	0.90%	0.80%	0.00%	0.28%	5.69%	5.04%	0.00%	0.32%	1.79%	0.00%
5	Debt securities, including UoP	5.89%	3.58%	0.00%	0.00%	0.00%	0.04%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.94%	3.63%	0.00%	0.00%	0.00%	7.96%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	2.37%	0.91%	0.00%	0.00%	0.89%	2.53%	2.50%	0.00%	2.13%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.13%	3.41%	0.00%	0.00%	3.02%	1.29%
21	Loans and advances	2.37%	0.91%	0.00%	0.00%	0.89%	2.53%	2.50%	0.00%	2.13%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.13%	3.41%	0.00%	0.00%	3.02%	1.29%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
24	Households	41.57%	1.58%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									41.57%	1.58%	0.00%	0.00%	0.00%	25.63%
25	of which loans collateralised by residential immovable property	99.67%	4.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									99.67%	4.24%	0.00%	0.00%	0.00%	9.54%
26	of which building renovation loans	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									100.00%	0.00%	0.00%	0.00%	0.00%	0.28%
27	of which motor vehicle loans	100.00%	0.00%	0.00%	0.00%	0.00%																					100.00%	0.00%	0.00%	0.00%	0.00%	0.86%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	14.12%	0.90%	0.00%	0.00%	0.03%	0.09%	0.09%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	14.22%	0.99%	0.00%	0.00%	0.10%	79.20%

GAR KPI flow as at 31.12.2024 -based on CapEx KPI

	% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	30.92%	1.46%	0.00%	0.12%	0.19%	0.36%	0.21%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.34%	0.12%	0.00%	0.00%	31.62%	1.79%	0.00%	0.12%	0.20%	36.61%
2	Financial undertakings	2.87%	0.66%	0.00%	0.24%	0.37%	0.70%	0.42%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.66%	0.24%	0.00%	0.00%	4.24%	1.32%	0.00%	0.24%	0.39%	9.36%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	8.06%
4	Loans and advances	1.49%	1.32%	0.00%	0.48%	0.47%	1.46%	1.30%	0.00%	0.46%	1.44%	1.27%	0.00%	0.45%	1.41%	1.25%	0.00%	0.44%	1.38%	1.22%	0.00%	0.42%	1.32%	0.48%	0.00%	0.42%	8.50%	6.84%	0.00%	0.48%	2.67%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	8.05%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	20.56%	4.72%	0.00%	1.71%	2.63%	5.02%	3.00%	0.00%	0.13%	0.00%	0.00%	0.00%	0.00%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.72%	1.71%	0.00%	0.00%	30.37%	9.42%	0.00%	1.71%	2.76%	1.31%
21	Loans and advances	20.56%	4.72%	0.00%	1.71%	2.63%	5.02%	3.00%	0.00%	0.13%	0.00%	0.00%	0.00%	0.00%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.72%	1.71%	0.00%	0.00%	30.37%	9.42%	0.00%	1.71%	2.76%	1.31%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
24	Households	41.57%	1.58%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									41.57%	1.58%	0.00%	0.00%	0.00%	25.94%
25	of which loans collateralised by residential immovable property	99.67%	4.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									99.67%	4.24%	0.00%	0.00%	0.00%	9.66%
26	of which building renovation loans	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									100.00%	0.00%	0.00%	0.00%	0.00%	0.28%
27	of which motor vehicle loans	100.00%	0.00%	0.00%	0.00%	0.00%																					100.00%	0.00%	0.00%	0.00%	0.00%	0.87%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	14.34%	0.67%	0.00%	0.06%	0.09%	0.17%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.16%	0.06%	0.00%	0.00%	14.67%	0.83%	0.00%	0.06%	0.09%	79.20%

KPI off-balance sheet exposures by stock as at 31.12.2024 - based on turnover KPIs

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31.12.2024																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	7.37%	1.36%	0.72%	0.03%	0.61%	1.25%	0.22%	0.19%	0.03%	0.00%	0.00%	0.00%	0.00%	1.15%	0.00%	0.00%	0.00%	0.33%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	10.12%	1.58%	0.92%	0.03%	0.64%

KPI off-balance sheet exposures by stock as at 31.12.2024 - based on CapEx KPIs

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31.12.2024																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	5.69%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.69%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	7.21%	2.47%	0.93%	0.16%	1.38%	0.63%	0.23%	0.22%	0.01%	0.00%	0.00%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.18%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	8.07%	2.70%	1.15%	0.16%	1.39%

KPI off-balance sheet exposures by flow as at 31.12.2024 - based on turnover KPIs

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31.12.2024																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	0.000%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	6.30%	1.19%	0.64%	0.03%	0.52%	0.64%	0.09%	0.06%	0.02%	0.00%	0.00%	0.00%	0.00%	1.09%	0.00%	0.00%	0.00%	0.27%	0.00%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	8.33%	1.28%	0.71%	0.03%	0.54%

KPI off-balance sheet exposures by flow as at 31.12.2024 - based on CapEx KPIs

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31.12.2024																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	5.93%	1.75%	0.81%	0.10%	0.85%	0.40%	0.08%	0.08%	0.00%	0.01%	0.01%	0.01%	0.00%	0.01%	0.00%	0.00%	0.00%	0.18%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	6.55%	1.84%	0.89%	0.10%	0.85%

KPIs for activities related to gas and nuclear energy

Based on the list of non-financial entities subject to non-financial reporting obligations, the Group identified the customers which stated in their annual reports for 2023 that they conduct Taxonomy-eligible activities related to gas and nuclear energy.

Below are the disclosure templates provided in Annex XII to Delegated Regulation 2021/2178 (as amended) on the activities of the Group's customers in the above-mentioned sectors based on turnover KPIs and capex KPIs published by them.

Nuclear and fossil gas related activities

Nuclear energy related activities		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Taxonomy-aligned economic activities (denominator)as at 31.12.2024 - based on turnover KPIs

Economic activities		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
2	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
3	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
4	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
5	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
6	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	1,445,843.5	0.63%	1,395,357.8	0.61%	50,485.7	0.02%
8	**Total applicable KPI**	1,445,843.5	0.63%	1,395,357.8	0.61%	50,485.7	0.02%

Taxonomy-aligned economic activities (denominator)as at 31.12.2024 - based on CapEx KPIs

Economic activities		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
2	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
3	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
4	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
5	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
6	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	1,332,434.5	0.58%	1,300,198.5	0.57%	32,236.0	0.01%
8	**Total applicable KPI**	1,332,434.5	0.58%	1,300,198.5	0.57%	32,236.0	0.01%

Taxonomy-aligned economic activities (numerator) as at 31.12.2024 - based on turnover KPIs

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
2	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
3	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
4	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
5	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
6	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	1,445,843.5	100.0%	1,395,357.8	96.50%	50,485.7	3.49%
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	1,445,912.2	100.0%	1,395,357.8	96.50%	50,485.7	3.49%

Taxonomy-aligned economic activities (numerator) as at 31.12.2024 - based on CapEx KPIs

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
2	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
3	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
4	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
5	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
6	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	1,332,434.5	96.39%	1,300,198.5	94.06%	32,236.0	2.33%
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	1,382,353.3	96.39%	1,300,198.5	94.06%	32,236.0	2.33%

Taxonomy-eligible but not taxonomy-aligned economic activities as at 31.12.2024 - based on turnover KPIs

Economic activities		Proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
2	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
3	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
4	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
5	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,822.6	0.0%	2,822.6	0.0%	0.0	0.0%
6	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	182.1	0.0%	182.1	0.0%	0.0	0.0%
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	53,107,268.7	23.23%	53,106,613.8	23.23%	654.9	0.0%
8	**Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI**	53,110,273.3	23.23%	53,109,618.4	23.23%	654.9	0.0%

Taxonomy-eligible but not taxonomy-aligned economic activities as at 31.12.2024 - based on CapEx KPIs

Economic activities		Proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
2	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
3	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
4	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	16,935.4	0.01%	16,935.4	0.01%	0.0	0.0%
5	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,912.1	0.0%	1,912.1	0.0%	0.0	0.0%
6	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%	0.0	0.0%	0.0	0.0%
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	53,254,434.5	23.29%	53,221,101.2	23.28%	33,333.3	0.01%
8	**Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI**	53,273,281.9	23.30%	53,239,948.7	23.29%	33,333.3	0.01%

Taxonomy non-eligible economic activities as at 31.12.2024 - based on turnover KPIs

	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.2	0.0%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.2	0.0%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.2	0.0%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	0.0%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	0.0%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0%
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	54,205,516.9	23.71%
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'**	54,205,517.7	23.71%

Taxonomy non-eligible economic activities as at 31.12.2024 - based on CapEx KPIs

	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.4	0.0%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.4	0.0%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.4	0.0%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.2	0.0%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	0.0%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	0.0%
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	53,988,396.2	23.62%
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'**	53,988,397.6	23.62%

Rules for Taxonomy assessment for the purpose of GAR reporting for 2024

Identification of customers subject to NFRD/CRSD and general rules

Santander Bank Polska Group identifies financial and non-financial entities to be subject to Taxonomy assessment and included in the GAR numerator using databases of third parties, i.e. BIK (in the case of domestic companies) and Clarity (in the case of EU companies registered outside Poland). The identified customers were required to make their own Taxonomy disclosures for 2023 as they are public-interest entities, meet the definition of a large company and employ more than 500 people on average per year. The list of customers was extended to include special purpose vehicles and subsidiaries of the entities that meet NFRD/CSRD criteria. As part of the review of the database of entities subject to assessment in terms of Taxonomy eligibility and Taxonomy alignment, the Group analysed the active portfolio of customers based on expert judgment and internal systems which have been steadily updated since 2024 using information about employment and financial data on turnover and total assets provided by customers.

In the case of general purpose credit exposures or bonds used by financial and non-financial entities to finance their working capital needs, the value of Taxonomy-eligible and Taxonomy-aligned assets was calculated as a product of the gross value of exposures and relevant turnover and capex KPIs reported by the Group's customers or their parent entities. These indicators were provided by third parties, i.e. BIK (in terms of domestic entities) and Clarity (in terms of non-residents). They come from the publicly available statements on non-financial information for 2023 published by entities subject to NFRD/CRSD. If there were any doubts as to the accuracy of KPIs provided by third parties, the Group analysed the source information, i.e. Taxonomy disclosures published by the aforementioned financial or non-financial entities.

In the case of loans and leases granted as well as acquired bonds financing specific purposes (assets, projects), the economic activities financed by the Group were assessed on a case-by-case basis in terms of Taxonomy eligibility. If the result of the assessment was positive, they were subsequently analysed in terms of Taxonomy alignment, i.e. if they met the technical screening criteria and the minimum safeguards criteria.

The methodology, analysis and results of both stages of the Taxonomy assessment were reviewed and approved by the ESG Panel. The Panel reviews the transactions made by business units of Santander Bank Polska Group (excluding Santander Consumer Bank Group) and decides if they meet the criteria of the EU Taxonomy and internal Sustainable Finance and Investment Classification System (SFICS). Entities of Santander Consumer Bank Group collect data and conduct Taxonomy assessments independently. The final templates are aggregated at the level of Santander Bank Polska S.A. as a parent entity.

Off-balance sheet exposures to non-financial entities subject to NFRD/CSRD (i.e. financial guarantees granted and assets managed by Santander TFI S.A.) are assessed as Taxonomy-eligible and Taxonomy-aligned based on the indicators concerning turnover and capital expenditure.

Assessment of exposures to customers subject to NFRD/CSRD

Assessment of Taxonomy eligibility of exposures to customers subject to the NFRD

Transactions with credit institutions and other financial institutions (understood exclusively as insurance companies, investment firms and asset managers) gave rise to general purpose exposures and qualified as Taxonomy-eligible or Taxonomy-aligned to the extent indicated by the KPIs published by the above-mentioned customers.

In the Corporate and Investment Banking Division, specific purpose exposures to corporate customers subject to NFRD/CSRD arising from term/investment loans, syndicated loans, trade finance and project finance were assessed in terms of Taxonomy eligibility in relation to individual environmental objectives using expert judgment.

In the Business and Corporate Banking Division, Taxonomy-eligible debt instruments were identified either on the basis of expert judgment (in the case of older exposures) or digitalised results of the questionnaire obligatorily completed by customers subject to NFRD/CSRD applying for specific purpose loans as part of the regular classification of loans based on the EU Taxonomy and the internal Sustainable Finance and Investment Classification System (in the case of new exposures).

Taxonomy eligibility of leasing transactions with customers subject to NFRD/CSRD was assessed on the basis of the leased assets.

Assessment of Taxonomy alignment of exposures to customers subject to NFRD/CSRD

General rules

Exposures financing general corporate purposes of NFRD/CSRD customers are assessed in terms of Taxonomy alignment based on Taxonomy KPIs published by those entities. The Group's approach to assessing Taxonomy alignment of specific purpose exposures is described in detail below.

Exposures financing specific purposes (assets/projects) classified by the ESG Panel of Santander Bank Polska S.A. as sustainable finance in line with the internal Sustainable Finance and Investment Classification System (SFICS) were thoroughly reviewed in terms of Taxonomy alignment.

The verification of technical screening criteria and the DNSH criterion is based on the analysis of technical documentation of the project, environmental decisions and other reports provided by the customer. The assessment covers the environmental and social impact as well as the investor's effectiveness in implementing the required mitigation and compensation measures to protect the environment and local community. Furthermore, to identify potential physical risks in the location of the financed investment, the Bank uses a database fed with data from an external EU provider.

The environmental and social analysis is conducted in line with the Equator Principles, a formal methodology adopted by the Bank to assess investments related to projects.

Each majority investor is also verified in terms of compliance with the minimum safeguards. Specifically, the Bank checks if the investor has rules or due diligence processes in place regarding human rights, good tax practices, fair competition and prevention of corruption, and if all employees and suppliers are required to adhere to them. To that end, in 2024 the Group introduced two types of statements for customers, with requirements and wording depending on the size of their business. Investors in projects classified by Santander Bank Polska S.A. as Taxonomy-aligned meet the minimum safeguards criteria.

Factors affecting the reporting of Taxonomy-aligned activities

The Bank keeps improving its reporting systems and processes by developing new solutions to facilitate the certification of transactions.

At the same time, it is aware of challenges connected with the robust criteria for assessing different types of economic activities and the availability of the underlying data. Similarly to the last year, there were insufficient data about certain assets and activities to confirm that they were Taxonomy-aligned. The number of customers which are subject to CSRD and therefore required to report on Taxonomy-related issues was still low in 2024, which limited the value of GAR. Customers' awareness and data availability are expected to increase in the coming years along with growth in the number of customers subject to CRSD reporting obligations.

Another issue is the lack of consistent rules or sufficient evidence to assess the DNSH and minimum safeguards criteria. Due to the above limitations, Santander Bank Polska S.A. updated the internal Sustainable Finance and Investment Classification System (SFICS). It sets out the technical criteria to be met by specific and general purpose lending to be classified as green, social or sustainable finance. The system is based on the recognised market standards, in particular the EU Taxonomy in respect of technical screening criteria. Other guidelines that the system refers to are: ICMA Social and Green Bond Principles, Climate Bond Standards and LMA Sustainability Linked Loan Principles. This regulation was updated in 2024 in line with evolving market standards and regulations.

Results of assessment and documentation of Taxonomy-aligned activities in 2024

In 2024, the ESG Panel assessed specific purpose lending in the form of project finance originated by the Corporate and Investment Banking Division. Based on the information collected, one transaction with an SPV of a customer subject to NFRD/CSRD was identified.

Santander Bank Polska Group collected and assessed documentary evidence for the purpose of Taxonomy disclosures and the financing was certified by the ESG Panel as Taxonomy-aligned. As part of the transaction, a loan of PLN 237.6m was granted, of which PLN 175.0m was disbursed as at 31 December 2024. The activity subject to assessment is electricity generation from wind power, which contributes to climate change mitigation. As part of assessment of the DNSH criterion in relation to climate change adaptation, the Group analysed the external data and concluded that the location of the wind farm does not generate any physical risks during the lifetime of wind turbines in any of the climate scenarios. As regards the transition to a circular economy, the wind turbines used in the project were confirmed to be supplied by a company that publicly declares that the turbines are in 85% intended for recycling, which meets the Bank's internal requirements. The supplier is aware of the challenge and is actively developing technology for recycling composite materials in order to achieve the goal of zero waste production from wind turbines by 2040. Next, the project was analysed in terms of protection and restoration of biodiversity and ecosystems, using documentary evidence collected (environmental impact assessment reports, annual pre-implementation monitoring reports, etc.). The analysis concluded that the project does not negatively affect the environment but will be monitored going forward in accordance with the decision issued by a relevant government authority. If any negative impact is identified, the customer will have to take relevant mitigation measures. The assessment of compliance with the minimum safeguards is based on the analysis of disclosures of non-financial entities made in statements or reports on non-financial information, corporate materials available online and data from the BIK database. Since 1 March 2024, the Bank has also used customers' statements on compliance with the minimum safeguards, broken down by customers which meet CSRD requirements, SME customers and other customers. The statements address such issues as human and employee rights, taxation, fair competition and prevention of bribery. As part of the Business and Corporate Banking segment, no Taxonomy-aligned specific purpose transactions with NFRD/CSRD customers were identified.

Assessment of Taxonomy eligibility and Taxonomy alignment of exposures to households

Santander Bank Polska Group identified the following finance for households as Taxonomy-eligible: home loans and cash loans for environmentally sustainable purposes (including improvement of energy efficiency of buildings), biomass-fuelled heating devices, electric car charging stations, photovoltaic panels/installations, heat pumps, motorbikes, passenger cars and delivery vans up to 3.5t, granted on or after 1 January 2022.

The above loans for households are presented in the quantitative disclosure templates under "loans secured by residential properties", "loans for building renovation" and "motor vehicle loans" as Taxonomy-eligible products contributing to climate change mitigation.

As part of reporting for 2024, the Taxonomy-aligned products only included mortgage loans granted to personal customers of Santander Bank Polska S.A. for purchase of residential property (excluding the portfolio of Santander Consumer Bank S.A. as those loans were withdrawn from the offer in 2009) that:

- met the criterion of substantial contribution based on the analysis of energy performance certificates obtained from customers and recorded in the Bank's systems since 2024 as well as historical data from the central register of energy performance of buildings (including certificates issued in Poland since 2015);
- were positively verified in terms of physical risks.

Pursuant to Section 7.7 of Annex I to the Climate Delegated Act, residential buildings built before 31 December 2020 meet the criterion of substantial contribution to climate change mitigation if they are within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED). According to the analysis of PED distribution conducted by the Ministry of Development and Technology based on the central register of energy performance of buildings, top 15% energy-efficient buildings built before 31 December 2020 (which have energy performance certificates in place) have PED below 83.91 kWh/(m^2*year) in the case of single-family houses and below 81.86 kWh/(m^{2*} year) in the case of multi-family houses.

For buildings built after 31 December 2020, the criterion of substantial contribution to climate change mitigation is met if the EP ratio is at least 10% lower than the threshold set for nearly zero-energy buildings, which, according to the national legislation (Notice of the Minister of Infrastructure of 12 April 2002 on the technical conditions to be met by buildings and their locations), means below 63 kWh/(m^2*year) for single-family houses and below 58.5 kWh/(m^{2*} year) for multi-family houses.

The compliance with the DNSH criterion as part of contribution to climate change mitigation was analysed on the basis of the exposure of financed properties to physical risk. The analysis was based on the location of the property and information about severe or recurrent climate threats in that location obtained from the external database.

The Group chose not to analyse compliance with the minimum safeguards in relation to mortgage loans as it is virtually impossible in the case of properties purchased by consumers on the secondary market. Likewise, such analysis is not feasible in the case of properties bought on the primary market or developed and managed by consumers themselves as it would need to cover a wide range of contractors, manufacturers of components or lessors of construction machines. Furthermore, the requirements set out in Commission Notice no. C/2024/6691 on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation regarding the assessment of compliance with the minimum safeguards by manufacturers of goods purchased by consumers do not directly apply to properties. The examples of minimum safeguard verification provided in the Notice refer mainly to the manufacturers of such goods as photovoltaic panels or electric cars.

As there is no established uniform market practice in this respect, the interpretation adopted by the Group which permits not to assess the above exposures in terms of compliance with the minimum safeguards may not be valid in the next reporting periods.

Taxonomy-eligible financing for other purposes of households was considered by the Group as not Taxonomy-aligned in full, as it was not possible to obtain sufficient documentary evidence of compliance with the minimum safeguards and certain technical screening criteria. In line with Commission Notice no. C/2024/6691, in order to disclose a loan granted to a retail customer for the purchase of a product as Taxonomy-aligned, a credit institution should not only establish if the product meets the relevant technical screening criteria, but also obtain documentary evidence that the producer complies with the minimum safeguards. As there are no systemic solutions in place for gathering information about producers and certain product features (e.g. SPF in the case of heat pumps), it is not possible to assess the Taxonomy alignment of exposures presented in the quantitative disclosures under "loans for building renovation".

Local governments

The scope of disclosure includes loans to local governments for investment purposes, including for financing residential and commercial properties.

As part of the assessment, several exposures to local governments were identified as Taxonomy-eligible. They finance activities related to construction, extension and operation of waste water collection and treatment systems, modernisation of water collection, treatment and supply systems, urban and suburban transport and renovation of existing buildings. None of the above exposures was considered to be Taxonomy-aligned.

Comparability of periods

As part of disclosures for 2023, Santander Bank Polska Group was required to publish the results of assessment of its portfolio in terms of Taxonomy eligibility and Taxonomy alignment only with regard to two climate objectives: climate change mitigation (CCM) and climate change adaptation (CCA). As regards the other four environmental objectives, the activities of non-financial entities were assessed only in terms of Taxonomy eligibility. The assessment was made under a simplified approach, i.e. on the basis of customers' main business codes in the NACE system. The results were presented in aggregate by NACE code. Exposures to financial institutions were not assessed in terms of Taxonomy eligibility for other environmental objectives as Taxonomy KPIs were not publicly available. They will be published for the first time as part of disclosures for 2024.

As it was not possible to automatically separate mortgage loans for development of new buildings or loans for purchase of residential properties in the disclosures for 2023, a more stringent approach was used to assess the substantial contribution to climate mitigation, namely the criterion applicable to the buildings built after 31 December 2020.

In 2023, the Group disclosed the portfolio of cash loans for environmentally friendly purposes as Taxonomy-aligned. However, this portfolio can no longer be classified as environmentally sustainable as part of the reporting for 2024 because of the interpretation included in Commission Notice no. C/2024/6691 of 8 November 2024, requiring credit institutions to ascertain compliance with the minimum safeguards by producers of goods or providers of services bought by customers and financed with a bank loan. The prevailing interpretation last year was that the minimum safeguards did not apply to loans and advances to households.

Due to better understanding of the requirements and methodology for presentation of sustainability KPIs (based on, inter alia, the guidance included in Commission Notice no. C/2024/6691), the presentation of cash with the central bank of PLN 5,807.6m in the tables for 2023 was changed by transferring the above amount from cash and cash-equivalent assets to the central banks line item. Furthermore, the amount provided in the central governments line item, which was last year disclosed in accordance with the original capacity of FINREP ITS, was adjusted by excluding PLN 1,227.5m of exposures to local governments and disclosing them under local governments financing (PLN 105.2m) and other assets (PLN 1,122.3m).

In the household segment, the higher line item presents the total portfolio of loans and advances to households of PLN 86,413.6m (including an amount of PLN 34,303.9m previously disclosed under other assets) instead of the sum of lower line items, i.e. PLN 52,109.7m according to the approach used last year.

In 2023, the segment of financial and non-financial entities not subject to NFRD included a separate line item dedicated to financial entities, under which an amount of PLN 19,857.4m was disclosed. In 2024, it is disclosed under financial instruments as part of the SMEs and entities not subject to NFRD.

1. Voluntary disclosure

In the Business and Corporate Banking segment, one specific purpose transaction with non-NFRD/CSRD customer was assessed as complying with the technical screening criteria of the EU Taxonomy. As part of the transaction, a loan of PLN 115m was granted. The gross carrying amount as at 31 December 2024 was PLN 113.3m. The assessed activity is the acquisition and ownership of buildings, which contributes to climate change adaptation. The verification of technical screening criteria concluded that the customer had assessed physical climate risk relevant to its operations using external databases. It identified the main threats and took measures to increase resilience.

In relation to the climate mitigation objective and the DNSH criterion, it was confirmed that the building is not dedicated to extraction, storage, transport or manufacture of fossil fuels, as evidenced by the building permit and design. The subsidiary's compliance with the minimum safeguards was evidenced by a legal document. The Bank also reviewed the policies, processes and code of conduct of the parent entity in terms of implementation of declarations in line with the OECD and UN Guidelines. The compliance with the minimum safeguards, technical screening criteria and DNSH criterion was evidenced by multiple reports, certificates and the Second Party Opinion. The analysis presented in the documentation was assessed by the Bank as reasonable, relevant and performed with due diligence.

2. Taxonomy-aligned activities and the sustainable development agenda

Due to the high level of difficulty of the Taxonomy assessment of credit institutions as well as strict technical screening criteria and other conditions which must be met to classify financing as Taxonomy-aligned, the quantitative Taxonomy disclosures of Santander Bank Polska Group do not precisely reflect the extent of measures taken by the Group as part of its sustainable development agenda. The results of the Group's initiatives supporting environmental sustainability and energy transition are presented in more detail in the section 2.3 "Actions and resources in relation to climate change policies (E1-3)".

The portfolio of Taxonomy-aligned loans and advances is expected to grow going forward along with the statutory extension of the scope of entities subject to CSRD as well as development of know-how and system for collecting, processing and documenting technical data and other non-financial information on the financed customers and products. That said, the observations from the last two years, during which the Group identified isolated transactions which were (or could be) Taxonomy-aligned and classified part of the portfolio of home loans as Taxonomy-aligned, are not sufficient to draw meaningful conclusions or predict future trends.

3. EU Taxonomy in the Group's business strategy, product design processes and engagement with clients and counterparties

Due to the limitations mentioned above, specifically the marginal percentage of customers subject to NFRD (and CSRD, starting from the current reporting period), the Group does not design products dedicated to financing Taxonomy-aligned activities.

One of the priorities of the Total Responsibility area of the Group's business strategy is to support customers in their sustainable transition.

The direction of this transition is linked with climate goals of the EU Taxonomy, namely: adaptation to and mitigation of climate changes. To support the customers, the Group engages in a dialogue to analyse their investments and determine if they are Taxonomy-aligned (or can be in a longer-time perspective). It is particularly important in the case of such customers as managers of older commercial properties who look to improve energy efficiency of the buildings.

An important step towards transformation of the energy system in Poland is to support projects related to renewable energy sources and other low-carbon solutions delivered by customers which currently generate energy mainly from conventional sources. Santander Bank Polska S.A. actively contributes to that process.

The value of lending granted by the Bank for environmentally sustainable purposes has been steadily rising. Such purposes include renewable energy sources, improvement of energy efficiency of buildings and electromobility. The Bank also intends to increase its lending for sustainable agriculture technologies and new energy technologies such as energy storage facilities or other strategic solutions for the energy sector.

For more information, please see the section 2.3 "Actions and resources in relation to climate change policies (E1-3)".

3. Social information

3.1. Our People – own workforce (ESRS S1)

3.1.1 Impacts, risks and opportunity management

Policies related to own workforce (S1-1)

Significant impacts on our employees

Our employees play a key role in the implementation of the Group's strategy and objectives, so we listen to their voice and we try to get their point of view. In the "We Help You Achieve More" strategy for 2024-2026, employees are at the centre of our activities and it highlights their importance to the long-term success of the Group. As part of the strategic direction 'Total Experience', we developed an integrated Total Experience (TX) approach – a way of designing solutions, combining customer experience (CX) and employee experience (EX).

The results of the double materiality assessment clearly indicate that topics of working conditions, equal treatment and equal opportunities as well as employee data protection are material to our business:

- In the working conditions area, we identified the importance of flexible solutions to reconcile work and personal responsibilities, as well as promote the health and well-being of employees by initiatives that support workplace safety and comfort.
- Equal treatment includes measures to equalise salaries, increase the proportion of women in senior positions and promote professional development through training.
- In the context of data protection, we focused on the need to ensure employee privacy in connection with the use of advanced IT infrastructure and data management systems.

Due to the early stage of work on the transition plan, we are currently not identifying impacts on employees resulting from transformation activities. Analysis of such impacts will be carried out in the later stages of the transition plan preparation. As the Group, we did not identify material negative impacts on our employee resources – due to the nature of our business, the risk of occurrence of things such as child labour, forced labour or serious industrial accidents is really low.

Policies regarding the management of impacts, risks and opportunities related to the Group's own workforce (MDR-P)

The primary and overarching document we use to achieve our strategic objectives in the employee is the Human Resources Management Corporate Framework', which outlines the process of managing the 'employee life cycle' within the organization. This life cycle includes recruitment, hiring, adaptation, training, development, goal setting, performance appraisal, remuneration, succession, and, where appropriate, termination of employment.

In addition, the management of impacts on own workforce is governed by various policies, with key ones applying across the Group. Disclosures in the Own Workforce section (ESRS S1) refer to all employee resources of the Group, with a particular focus on employees under employment contracts. Nonetheless, it is worth emphasising that the Group's policies, in particular those related to human rights, ethical conduct, respect, inclusiveness and diversity, also extend to other categories of non-employees who are part of own workforce. This includes the self-employed, employees employed by employment agencies and those working under civil law contracts. In this way, as the Group, we ensure that all team members, regardless of their form of employment, are treated with equal care and respect. These policies promote decent working conditions, equal treatment and the creation of a working environment based on ethical values.

Policies that are confidential and intended for internal use are available to employees via the intranet. Policies that are public in nature are made available through the Bank and the Group Companies' websites, which ensures transparency and access to information. Each policy has an assigned owner within each of the Group Companies, who is responsible for its implementation and the implementation of the obligations according to its regulation.

The implementation of each policy is described in detail in sections related to the respective areas. Responsibility for implementing the policies usually lies with the Management Board, unless otherwise stated in the content.

Policy	Description of content	Scope of application of the policy or exclusions
General Code of Conduct	The Code requires all Group employees to adhere to the principles of ethics, integrity and equal opportunities, regardless of their form of employment. It prohibits discrimination, promotes equal treatment and provides a system for reporting irregularities. The Code emphasises social responsibility, safe working conditions and employee development. ***Addressed IRO:*** *The Code primarily addresses impacts related to working conditions, including 'Potential harm to employees through experiencing situations related to long working hours, controversies regarding corruption and human rights violations, or proven infringements'.*	Group (Stellantis companies have implemented their own regulations in this regard)
Corporate Culture Policy of Santander Bank Polska Group	The policy describes areas such as mission, vision, values, TEAMS behaviours, risk cultures, leadership, diversity, equality and inclusivity, employee volunteering, monitoring and control. ***Addressed IRO:*** *The Policy primarily addresses the impact of working conditions and equal treatment and opportunities for all.*	Group (excluding Stellantis companies)
Respect and Dignity Policy	The policy emphasises guidelines and standards for a safe, supportive working environment by addressing mobbing, discrimination and other forms of unethical behaviour in employee relations. The Bank undertakes education and intervention activities to ensure compliance with the Policy. The Policy was updated in July 2024 to implement the provisions of the 'Protocol Against Mobbing, Discrimination, Sexual Harassment and for Moral Integrity in the Workplace'. ***Addressed IRO:*** *The Policy addresses the impacts related to equal treatment and equal opportunities for all.*	Group (excluding Stellantis)
Health, Safety and Wellbeing Policy	The policy sets out the guidelines and standards to be followed to protect health and life and ensure the highest levels of safety and wellbeing of employees, promote healthy lifestyles and create long-term value for employees and local communities. ***Addressed IRO:*** *The Policy addresses impacts related to working conditions, equal treatment and equal opportunities for all, and above all 'Promoting the health and well-being of employees based on appropriate monitoring and best practices and initiatives for health and safety of the organisation.*	Bank (The Group companies have an occupational health and safety system in place, but it is not regulated in the form of a policy)
Diversity Policy with regard to the composition of the bank's Management Board	The purpose of the document is to diversify the Board Members and to achieve diversity in the composition of the Management Board. ***Addressed IRO:*** *Wage gaps and the participation of women at all levels of employment.*	Bank
Remuneration policy of the Santander Bank Polska S.A. Group.	The document sets out framework standards for remuneration, which reduces the risk of wage inequality and promotes equal treatment. The Management Board and Supervisory Board are responsible for approving the policy, ***Addressed IRO:*** *Wage differences and share of women at all levels of employment, Protection of employees through adequate wages and benefits, Positive impact on employees' wages in connection with adjusting wages to current economic situation in Poland.*	Group (regulation adjusted to the profile and scope of activities of each Group company)
Training and Development Policy	The policy describes the operating framework and criteria for developing, reviewing, implementing, overseeing and modifying training and development activities; supporting the Group's cultural and business transformation strategy; and promoting learning management and knowledge transfer, as well as innovation and skills development needed by employees now and in the future. ***Addressed IRO:*** *Improving employee qualifications through training and professional development initiatives.*	Group (Stellantis companies implemented their own regulations in this regard)
Performance Management in Santander Bank Polska Group Policy	The policy outlines the Group's performance management model for all employees. In addition, it sets out the framework, tools, terms and terminology for performance management and indicates the scope of application and expectations of the individuals and units involved in the process. ***Addressed IRO:*** *Potential harm to workers through experiencing situations related to long working hours, controversies regarding corruption and human rights violations, Flexible working conditions enabling workers to reconcile work with their personal situation.*	Group (excluding Santander Consumer Bank and Stellantis)
Whistleblowing Policy	The Whistleblowing Policy defines the rules for the operation of a system of reporting violations by employees, including violations of the law, ethical standards and internal regulations. The system ensures confidentiality, the possibility of anonymous reporting and protection against reprisals against whistleblowers. In 2024, the process was extended to include a new internal Reporting Procedure (whistleblower protection), which implements the Whistleblower Protection Act in the Bank. ***Addressed IRO:*** *Potential harm to employees through experience of situations involving long working hours, controversies regarding corruption and human rights violations, or proven violations.*	Group (Stellantis companies implemented their own regulations in this regard)
Responsible Banking and Sustainability Policy	With regard to labour issues, the policy addresses the provision of decent working conditions, equal opportunities, anti-discrimination and anti-harassment, compliance with health and safety regulations and protection of personal data. The policy supports the right to association, fair wages and work flexibility, promoting work-life balance. ***Addressed IRO:*** *Potential harm to employees through experience of situations involving long working hours, controversies regarding corruption and human rights violations or proven violations, lack of protection of employee privacy resulting from the database infrastructure and data processing software used by the Bank to host and manage all operations.*	Group (excluding Stellantis companies)

Respect for human rights

The respect and protection of human rights in the Group are governed by, among other things, the "Responsible Banking and Sustainability Policy". The policy emphasises the relevance of our commitments to stakeholders and explain processes of applying social, environmental and corporate governance standards in accordance with the "Responsible Banking Model". The policy sets out, among other things, the principles, commitments, objectives and strategy in relation to employees and other stakeholders, as well as to social issues, diversity, respect for human rights and the prevention of illegal activities (including child labour, forced labour and human trafficking).

In the area of relations with employees, we are committed to:

- prevention of discrimination and practices that violate human dignity,
- avoiding forced or child labour,
- respect for the right of association and collective bargaining,
- ensuring health and safety in the workplace (health and safety standards),
- decent employment conditions.

The international standards underlying the "Responsible Banking and Sustainability Policy" include:

- Equator Principles of the International Finance Corporation,
- Universal Declaration of Human Rights,
- United Nations Global Compact initiative,
- Principles for Responsible Banking (UNEP FI),
- UN Sustainable Development Goals,
- UN Guiding Principles on Business and Human Rights,
- OECD Guidelines for Multinational Enterprises,
- Fundamental Conventions of the International Labour Organisation (ILO).

As part of our activities, we apply mechanisms aimed at preventing human rights violations (including the equal treatment policy, training on ethics and compliance issues – more in the section ‘Preventive and educational activities’). In addition, the Group has whistleblowing mechanisms in place – for details, see the section entitled ‘Reporting violations’.

2. Involvement of employees and procedures for working with employees' representatives (S1-2)

At the Bank, as well as across the whole Group, we are in constant dialogue with employees. We periodically gather employee opinion through YourVoice surveys, questionnaires and interviews and communicate information through internal tools such as the intranet, newsletters, bulletins and mailings. Every quarter, Management Board and members of the top management of the Bank meets with employees to summarise the past three months. Team-building meetings, workshops and training sessions are organised and used to build commitment, dialogue and information sharing within the Group. As the Group, we encourage all employees to be involved in activities that foster sustainable development in the spirit of inclusion and declare the active listening necessary to improve cooperation and respect the right of association and collective bargaining.

Delivering on our 2024-2026 strategy "We Help You Achieve More", we have developed an integrated Total Experience (TX) approach as part of our Total Experience (TX) direction. Adopting the employee experience (EX) management model, at Santander Bank Polska S.A. we have created an Employee Experience Competence Centre – empowered directly under the Management Board Member in charge of the Business Partnerships Division.

Ways of employee engagement:

- Research – we implement it at every stage of the employee 'life cycle' – from recruitment, to onboarding, to the survey sent to departing employees. We regularly conduct employee engagement surveys, including the YourVoice survey. The results of the survey, including the eNPS indicator, are analysed in detail and results influence corrective actions. We pay attention to making the employee voice present at all stages of the operation.
- Hot & Gain Employee Spots – in response to the voice of our staff, we have identified key areas to work on (including both our strengths and weaknesses) that need continuous improvement and change so that we can build activities that shape positive experiences. Such activities are carried out by multidisciplinary teams.
- In the first half of 2024 at the Bank, we completed work on the EX Health Check project, which monitors the impact of key initiatives and processes on employee experience through various indicators (including the Employee Effort Score). In addition, we have considered the EX perspective as a criterion

for prioritising strategic projects. In November 2024, we launched a platform for co-creation, through which we involve employees in the development of products and services. We have strengthened dialogue with employees through “EX #WDrodze” meetings organised at various locations.

- Organisation of periodic meetings of the EX Forum with the Board of Directors and the Quality Spot Review, which provide an opportunity to review the implementation of activities and set further work plans to successively improve the employee experience.

Educational and preventive actions in employee relation area

The Bank’s Ethics and Relationships Office carries out activities to educate, prevent and support ethical working relationships. In 2024, we implemented, among other things:

- 4 webinars with external experts on topics such as discrimination and ethics in communication.
- A series of articles on the intranet, e.g. "Mobbing – what do I know about it?" and "Stop for a moment", addressed to managers.
- Educational publication l titled "Diagnosis of the working environment" for managers, where for educational/preventive purposes we share tips on how to manage difficult employee situations.
- "Catching up with dialogue" project, which trained HR Business Partners (HRBPs) in mediation and early response to difficulties in employee relations.
- Meetings with managers, HRBPs and the development unit to share findings and recommendations from analyses of reported cases.
- Promoting a relational helpline for consultation on difficult situations in employee relations (the "Don't be alone" campaign).

Trade unions

We take care of relations with our employees among others by organising regular meetings with trade union representatives. This cooperation also includes consultations and providing opinions on regulations required by law that affect working conditions. We also strive to keep this dialogue open to current needs and expectations, which is why we are in constant contact with trade union representatives.

Health and safety at work

The Bank has a "Health, Safety and Wellbeing Policy", which sets out the guidelines and standards to be followed to protect health and life and ensure the highest levels of safety and wellbeing for employees. It also includes the promotion of healthy lifestyles and the creation of long-term value for employees and local communities. Working time and work-life balance issues are also regulated in the "Labour regulations". The Group companies do not have health and safety policies in place, but employees are covered by the company's internal health and safety management system.

Each Group Company provides safe and hygienic workplaces – all our employees (100%) are covered by the occupational health and safety system. There are Social Labour Inspectors and a Health and Safety Committee within our structures. The working environment at the Bank is monitored by the Health, Safety and Wellbeing Office, which conducts regular audits and reviews of occupational risk assessments for individual positions. Among other things, we take into account factors affecting physical safety, work ergonomics issues, as well as psycho-social risks and hazards associated with, for example, remote working. When updating the risk assessment, the experts take into account information on previous accidents as well as current legislation. We consult with employees and professional organisations. In special situations, we set up a crisis management team.

The process of assessing occupational risk for individual positions in the Group consists of five elements.:

1. Gathering information,
2. Identifying risks,
3. Estimating the probability of the hazard occurrence and its consequences,
4. Determining risk acceptability according to the PN-N-18002-2011 standard,
5. Monitoring and possible corrective action.

Within the Group, we verify and improve the correct operation of the health and safety management system. Specialists from the health and safety management units continuously enhance their qualifications at training courses, conferences and industry meetings.

All our employees receive health and safety training. Their scope and frequency are determined by legislation, changing external circumstances and needs reported by employees. Information on situations that pose a threat to the life or health of employees at the Bank is reported to the supervisor and to the staff of the Health, Safety and Wellbeing Office directly, by email, via an electronic form or phone. The effectiveness of conducted health and safety training is systematically verified through, among other things, health and safety audits, interviews with employees, analysis of accident incidents and post-training surveys.

In addition, we have implemented Business Continuity Plans throughout the Group, which consist of procedures and information to ensure business continuity in the event of an emergency. These allow the most important processes to be restored in the shortest possible time while ensuring an acceptable scope of operation for the Group.

In the Group we promoted a culture of caring for physical and mental health. In 2024 employees had access to webinars and expert training, competitions and preventive medical examinations, such as first aid or caring for mental well-being (e.g., webinar series "How to live with pain," Emotional Health and Safety (2nd edition), and Managerial Psychominutes, available to all Bank employees). We implemented contests and thematic programs to engage employees, such as "Health Culture Hero" and BeHealthy Week. We encouraged preventive examinations through training programs, such as "Keep Your Vision Sharp" and "Ergonomics in 7 Steps," and campaigns of selected preventive examinations at the Bank's headquarters.

We also care about the health and safety of employees with disabilities. At the Bank, we have been implementing the 'Differently Abled' project for several years, which aims to create a diverse working environment. We are preparing the organisation to employ people with disabilities (complying with workplace standards and regulations, allowing employees with disabilities to request full remote work if the nature of the work permits, and granting an additional two days off). An employee with a disability may also benefit from a one-time financial allowance.

Preventing and combating discrimination and diversity, and inclusivity in the workplace

How we foster an inclusive and respectful working environment

As we declare in the General Code of Conduct and the "Respect and Dignity Policy", we want to make sure that the Group is a safe place to work, where employees can be themselves and have equal opportunities. We do not tolerate any form of discrimination, mobbing, harassment or other behaviour that violates human dignity. We eliminate any unequal treatment related to gender, age, sexual orientation, gender identity, race, religion, nationality or other protected characteristics. The "Respect and Dignity Policy" is the foundation of our work against discrimination and inequality in employment, promotions and access to training. Part of the policy is the Protocol against mobbing, sexual harassment and discrimination, which expresses our firm lack of tolerance for such unethical behaviour. Each employee is required to read the General Code of Conduct, confirm this and complete the mandatory e-learning.

Prevention and education actions

We carry out activities such as:

- **Mandatory e-learning course "General Code of Conduct":** this course is provided to all employees to increase awareness of compliance with the law, internal procedures, and ethical standards. It covers compliance with laws, internal regulations, and ethical standards in general and highlights the existence of reporting channels for violations.
- **Mandatory e-learning course 'Show respect – be fair':** this training raises awareness of undesirable behaviour in the work environment, such as mobbing, discrimination and harassment, and teaches how to respond and where to look for support when it occurs.
- **Information and education campaigns:** We regularly publish articles, organise webinars, educational meetings and workshops to promote a culture of respect and integrity in our workplace.
- **Relationship helpline:** At the Bank, we provide employees with a tool for consulting difficult situations in employee relations, supporting our colleagues in resolving problems issues and fostering collaboration.

Reporting breaches

Violation reporting Policy (whistleblowing) underpins the promotion of a working environment free from discrimination and inequality. It ensures that all instances of breaches of equal treatment are reported and dealt with effectively. The Bank conducts regular training and awareness-raising campaigns to raise employees' awareness of their rights, available reporting channels and investigation policies. Employees can anonymously or non-anonymously report incidents related to discrimination, sexual harassment, derogatory or demeaning behaviour, mobbing and other forms of workplace harassment and inappropriate behaviour that violates organisational values and corporate ethics. Details of the process for reporting, monitoring and investigating incidents can be found in section S1-3.

Programmes promoting access to skills development

The Group has a "Training and Development Policy", which promotes the management of learning and knowledge transfer, as well as innovation and development of skills needed by employees now and in the future. The policy provides for the preparation of training plans tailored to the strategic needs of the Group and ensures that all employees have access to training activities that enable them to perform their duties effectively and develop their competencies.

Activities in the area of competence development

In the Group, we offer various forms of development. We post information on the intranet site regarding:

- training initiatives and development opportunities available to employees,
- tools to manage their own professional development,
- educational and inspirational materials to support personal and professional development.

Employees have access to training platforms which offer a wide range of customised online courses and opportunities for development in technical, soft and leadership skills. We deliver comprehensive training programmes including:

- bank-wide initiatives that promote growth in key areas for the Group,
- leadership training to support the development of management and leadership skills,
- programmes for branch networks that respond to the specific needs of employees in these structures,
- training for selected groups of employees, designed on the basis of a detailed analysis of their development needs.

Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3)

In our Group, we prioritise the wellbeing of our employees and strive to create a working environment that is transparent, safe and open to dialogue. Aware of the potential challenges in a dynamic financial environment, we implemented comprehensive procedures to identify, report and effectively address concerns about working conditions.

Whistleblowing Policy

Our Group has a "Whistleblowing Policy" and an "Internal Reporting Procedure (whistleblower protection)", which are overseen at the Bank by the Compliance Department. In accordance with these documents, we operate a comprehensive system that enables employees to report irregularities such as violations of the law, internal procedures or ethical standards. The system operates in accordance with the Banking Law and the Whistleblower Protection Act. The purpose of the regulations is, among other things, to ensure effective and uniform whistleblowing procedures that enable consistent reporting of information to management bodies. Regulations ensure that initiatives are in place to promote the usage of whistleblowing channels, their availability, information to our staff on whistleblowing statistics and lessons learned from investigations, and a regular review of the operation of the whistleblowing system by internal audit.

When a violation in the area of employee relations is confirmed, we take action to eliminate negative behaviour. Responsibility for compliance with the regulations rests with all employees, supported by appropriate communication and educational activities (an example is the mandatory e-learning course 'Show respect – Be Fair'). The Bank Management Board is responsible for the adequacy and effectiveness of procedures for employees to report violations.

The bank maintains a register of whistleblowing reports, which includes all reports received through whistleblowing channels. This allows for the analysis of received reports, taking actions in response to them and formulating development recommendations at the organisation-wide level.

Breach reporting channels

Information on breach reporting channels is widely available on the intranet. In addition, we promote awareness of the whistleblowing channels (through e-learning courses and articles on the intranet).

As the Group, we provide employees with the opportunity to report violations both anonymously and openly, using channels such as:

1. **KLAKSON application** – online form available on the intranet 24/7 (excluding Santander Consumer Bank companies).
2. **Ethical helpline** – operated by the compliance unit on weekdays (excluding Santander Consumer Bank companies).
3. **Email address** – an email account used exclusively for this purpose.
4. **Postal mail** – correspondence addressed to the compliance unit or directly to the Bank's Management Board.

The system ensures the anonymity of breaches reporting, the protection of the reporter's identity and the possibility to provide detailed information on violations, such as descriptions of events, evidence or other documents. The system has mechanisms in place to ensure the protection of employees making notifications:

- confidentiality – the applicant's data are protected at every stage,
- no retaliation – no retaliation against persons making reports,
- anonymity – the possibility to submit reports without revealing one's identity.

The whistleblowing channels indicated above are intended in particular for persons employed by the Bank under an employment contract or a civil law contract, including top management and members of the Bank's management and supervisory bodies, Group Companies have their own reporting channels.

Employees can also use a relationship helpline for consultation on difficult incidents in employee relations area. The Group also has trade unions to which employees can report problems and, as the Group, we engage in dialogue with them and respond to reported issues.

Monitoring

The management of the whistleblowing channel at the Bank is coordinated by the Compliance Unit, and in Group's companies it is handled by dedicated units. In order to ensure that the whistleblowing processes operate as intended by our regulations, we evaluate the functioning of the whistleblowing channels by periodic internal audits. In addition, they are subject to regular external audits. At Santander Bank Polska, the Ethics and Relationships Office analyses employee whistleblowing in the area of employee relations and, on the basis of this, makes recommendations on the preventive measures needed. For example, the Office regularly creates and makes available to managers the educational material 'Diagnosis of the working environment', in which it shares the conclusions of its investigations and provides guidance on how to manage difficult employee situations.

We check whether employees are aware of whistleblowing mechanisms and whether they trust them to be effective. Once a year, as a Bank, we conduct an anonymous survey addressed to all employees regarding compliance with the Bank's ethical principles, which includes questions on whistleblowing channels and questions on trust in these channels.

Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4) (MDR-A)

In 2024, we have taken a number of actions stemming from our strategy to prevent negative impacts, contribute to positive ones, minimize risks and take advantage of opportunities arising from our operations. Taking care of our employees is a priority for us, which is why we are taking actions on a continuous basis and will continue and adjust them in the years to come (for more details on ongoing activities and initiatives in the area of our own employee resources, see subsections S1-1, S1-3, S1-5) and Chapter IV "Development strategy" and Chapter V "Relations with employees".

Safety of the working environment

We regularly monitor the working environment at each job position and carry out risk assessment reviews. These cover risks affecting the safety and health of employees, such as psychological, ergonomic, health or other workplace-related risks. Our activities are aimed at creating a safe and healthy working environment that goes beyond standard legal requirements.

Culture of taking care of health and safety

We take actions to minimise the risks associated with health issues and the physical safety of our employees. Details on this topic can be found in the Health and Safety subsection.

Competence development and equal opportunities

We create and implement training initiatives that are accessible to all employees and targeted at specific groups according to their needs. These activities support personal and professional development, helping employees to achieve individual business objectives in line with the Bank's organisational culture and risk management principles. Employees and managers are introduced to a model that includes strategy, organisational culture and elements of risk management.

Equal treatment and diversity

We promote equal opportunities and diversity in the workplace. We support employee networks that bring together people with shared values and interests. These networks foster personal and professional development and increase employees' sense of belonging and commitment. Actions aimed at countering violations are described in subsection ‘How we ensure an inclusive and respectful working environment’.

Monitoring the effectiveness of measures

We continuously analyse the effectiveness of our actions through indicators of participation in initiatives and employee satisfaction surveys. The processes for monitoring and identifying necessary mitigation actions are described in the subsection Remediation processes for negative impacts and channels for employees to raise concerns.

The main tool for assessing the employee experience is the Your Voice survey. In 2024, we conducted one round of the survey, in which 87% of Bank’s employees participated, providing over 42 thousand comments. The results were analysed and communicated to competence centres and Hot Spots working on 'pain points'.

3.1.2 Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

In the Group we set goals that allow us to monitor and manage the impact of our activities on employees. These goals help minimise material negative impacts, strengthen positive effects, and manage significant risks and opportunities in employee relations. Both employee representatives and the teams themselves participate in setting goals, sharing their opinions and needs through consultations, surveys and focus groups.

The objectives that result from the strategy are subject to an appropriate management process – they undergo planning, Management Board approval, monitoring and periodic review, taking into account external factor, including regulations, and the operational performance of the Bank. In addition to this, the Group also has operational measures in place, which we treat as developing indicators and may also meet the requirements of MDR-T in the future.

Targets resulting from strategy (MDR-T)

In the area of own workforce, we have set the following targets:

- **Share of women in managerial positions**

  The Bank aims at providing diversity in managerial positions and ensuring adequate gender representation; hence, it monitors the share of women in managerial positions. The target applies to the Bank along with Santander Leasing and Santander Factoring (employees in middle and senior management positions). In 2024, we revised and reformulated the objectives, therefore we are using 2024 as the baseline The share of women in managerial positions in 2024 was 55.0%. The target set for 2027 is 56.5%. The progress toward this goal is on track.

- **Wage equalisation measured by Equal Pay Gap (EPG)**

  The Bank aims to provide equal pay for the same job or jobs of equal value. Therefore, in addition to calculating the overall gender pay gap (unadjusted pay gap – see more details in the "Remuneration Metrics" subsection), we also measure the Equal Pay Gap (EPG). The measurement captures the difference in average pay between men and women in the same jobs (taking into account employment level and location). It includes positions where at least three employees are employed, and the least represented gender constitutes a minimum of 20% of the workforce. The EPG is calculated as a weighted average across various aggregations, where an aggregation is defined as a combination of business unit, location, and job classification category.

  As a result, the indicator reflects the adjusted pay gap, differing from the unadjusted pay gap presented in section S1-16. The baseline year is 2023, when the target was adjusted as part of the Bank’s new strategy planning. The target set for 2027 is to keep the EPG below 1.70%.

	2023 actual	2024 actual	2027 plan
Equal Pay Measured by EPG	1.17%	0.50%	<1.70%

The progress of the aforementioned targets is monitored on a quarterly basis as part of the Bank's strategy and sustainability strategy progress reports, presented to the ESG Committee, the Management Board and the Supervisory Board. The scope and level of ambition of the targets is reviewed in the annual planning processes and can be adjusted taking into account the trajectory of the Group's strategic objectives to date and external factors.

Operational measures

Name of the target	Measure
One hundred per cent efficiency in carrying out post-accident investigations	% of accident investigations completed on time
One hundred per cent effectiveness in carrying out inspections of working conditions	% of completed audits
Creating a culture of caring for health	% of registered participants in initiatives
Effective delivery of information and knowledge to employees	▸ status of implementation of mandatory e-learning ▸ completion rate of annual training ▸ completion rate of on-time training ▸ level of implementation of required mandatory training ▸ level of delivery of optional risk category training – Number of hours spent on training delivery ▸ level of completion of optional risk category training – Number of trainees
Promoting the employment of people with disabilities	% of Bank employees with disabilities
Aiming to reduce the gender pay gap	Gender Pay Gap (unadjusted gender pay gap indicator)
Aiming to increase the representation of women in leadership positions at Promontorio, Faro and Solaruco (PFS)	% of women at senior managerial level (PFS)
Effective implementation of the Whistleblowing Policy and Internal Reporting Procedure (whistleblower protection)	the average number of notifications made through whistleblowing channels in a given quarter per 1,000 employees.
Effective implementation of the Group's Organisational Culture Policy	Average engagement survey score and eNPS – both of which take into account the following four factors: 1) Recommend: measures the likelihood of an employee recommending the Group as a place to work. 2) Loyalty: measures the likelihood of an employee remaining with the Group if they receive a similar job offer from another employer. 3) Conviction: measures the likelihood of an employee recommending the Group's products and services to family and friends. 4) Job satisfaction: measures overall job satisfaction.
Effective implementation of the Policy "Work Performance Management in Santander Bank Polska Group".	% of employees undergoing evaluation have completed annual assessment % of newly recruited employees with assigned mandatory targets % of employees with a correct target structure

We set the operational objectives of the units, including those directly affecting employees, on the basis of the Group's strategic goals. Periodic surveys are conducted at the Bank level to assess our progress in achieving them – we have named them the TX Barometer. Employees are involved in the work of setting and monitoring the achievement of objectives – we have described in detail how this is done in the section Involvement of employees and procedures for working with employees' representatives.

Characteristics of employees (S1- 6)

As of 31 December 2024, there were 11,959 employees working under employment contracts in the Group, the largest number of whom were employed by the Bank[8]. In addition, 7,014 non-employees provided work for the Group within the meaning of ESRS standards.

[8] *Figures on Stellantis Financial Services Polska include Shared Services Platform employees who are employed in Poland but serve customers from abroad.*

The figures below refer to the headcount as at 31 December 2024.

11,959 Group employees, including:

10,216 in the Bank

1,345 in Santander Consumer Bank

347 in Santander Leasing

117 in Santander Factoring

99 in Santander TFI S.A.

172 in Stellantis

In the Group, we have adopted the principle that employees working for more than one Group company are included in the reporting as follows:

- For Group consolidation: each employee is counted only once, regardless of the number of Companies in which they are employed. This eliminates double or multiple counting of the same person in the Group structure.
- For the data of individual Group companies, an employee is counted for every company in which he or she is formally employed. Consequently, the number of employees in all companies differs from the number of the employees of the Group.

> Number of employees by gender and contract type as of 31 December 2024

Group	Women	Men	Total
Employed for an indefinite term	6,918	3,443	10,361
Fixed-term employees	1,013	585	1,598
Total number of employees	7,931	4,028	11,959
Total number of FTEs	7,628	3,799	11,427

Full employment means working full-time, which according to Article 129 §1 of the Labour Code, is 8 hours per day and average of 40 hours in an average five-day working week in the adopted reference period.

> Number of employees by gender and FTE as of 31 December 2024

Group	Women	Men	Total
Full-time	7,457	3,731	11,188
Part-time	474	297	771
Total	7,931	4,028	11,959

> Number of employee leavers persons) and turnover rate in 2024.

	Number of attritions among employees	Employees turnover rate[9]
Women	1,150	14.4%
Men	529	13.1%
Total	1,679	14.0%

In 2024, we did not note any significant fluctuations in the number of employees in the Group, and those that did occur were due to standard employee turnover. The number of leavers includes all employees who terminated their employment during the reporting period and may include employees who changed employment within Group companies. The methodology for calculating the turnover rate is based on a comparison of the number of employee departures to the average headcount in the Group during the reporting period.

Characteristics of non-employees in the Group's own workforce (S1-7)

We have defined non-employees as persons who perform work for the Group but are not employed under a standard employment contract. This category includes:

- Self-employed – individuals running their own business and providing services under contracts with a Group.
- Persons employed by employment agencies – individuals who perform work for a Group but are formally employed by external temporary employment agencies.
- Persons on civil law contracts – individuals who perform work on the basis of specific-task contract or commission agreement concluded directly with a Group company and are not in an employment relationship with that company within the meaning of the Labour Code.

> Number of non-employee in the Group's own workforce by type of employment as of 31 December 2024

	Number of people
Self-employed persons	1,904
Persons employed by work agencies	584
Persons on civil law contracts	4,526
Total	7,014

Collective bargaining coverage and social dialogue (S1-8)

There are no collective agreements in the Group. By employee representatives, we mean persons elected by employees to represent their interests, e.g. within employee councils or trade unions. Under Polish law, employees may be represented by trade unions (Trade Union Act of 23 May 1991) or through other forms of representation, e.g. an employee council, if the conditions of the Act of 7 April 2006 on Informing and Consulting Employees are met. As of 31 December 2024, there were 5 trade union organisations in the Bank and 3 trade unions in Santander Consumer Bank. Moreover, in Santander Leasing and Stellantis other forms of employee representation were used, i.e. staff councils.

> Participation of employees covered by collective bargaining agreement and trade union representation

	2024
% of employees covered by (at least one) collective bargaining agreement	0.0%
% of employees covered by workers' representatives through trade unions or other forms of employees' representation	97.6%

[9] *The turnover rate is the number of employee departures divided by the average number of employees during the year,*

Diversity metrics (S1-9)

In accordance with the ESRS requirements, we have defined top management as employees on two levels below the management and supervisory bodies, namely the Management Board and the Supervisory Board of the Bank as a parent company. This definition also includes members of Management Boards of our Group subsidiaries and persons under their direct authority.

> Diversity of the Management Board and top management by gender in the Group as of 31 December 2024.

	Women	Men	Total
Number of people in the Management Board of the Bank's parent entity	2	8	10
Percentage breakdown	20.0%	80.0%	100.0%
Number of employees in the top management of the Group (one and two levels below the administrative and supervisory bodies of the Group)	77	125	202
Percentage breakdown	**38.1%**	**61.9%**	**100.0%**

> Age distribution of employees in the Group as of 31 December 2024

	Number of employees	Percentage distribution
Employees under 30 years of age	1,819	15.2%
Employees aged between 30 and 50	7,724	64.6%
Employees over 50 years of age	2,416	20.2%

Adequate Wages (S1-10)

All employees in the Group receive remuneration at least at the level of the national minimum wage.

According to the ESRS definition, adequate pay refers to remuneration that ensures a decent standard of living for employees and their families, covering basic needs while enabling savings and active participation in society.

The EU Directive 2022/2041 provides additional guidelines for adequate minimum wages aimed at improving workers' living standards in Member States. Poland is currently in the process of transposing this directive into national legislation, with the draft law regulating the minimum wage under review by Parliament.

Although the EU provisions have not yet been fully implemented, the Group has adopted the national minimum wage (as stipulated in the Minimum Wage Act of 31 December 2002) as its reference point. As of 30 September 2024, the minimum wage in Poland was PLN 4,300 gross per month and the minimum hourly rate was PLN 28.10 (effective from 1 July 2024).

Social protection (S1-11)

All employees in our Group are covered by full social protection – they are protected against loss of income as a result of major life events such as illness, unemployment, accidents at work, disability, parental leave and retirement. This protection is provided by both public schemes and additional benefits offered by particular Group Companies (e.g. group insurance).

In addition, the Bank and Group companies offer their employees social protection. This includes benefits such as:

- Subsidised access to private health care facilities for employees and their families,
- The option of subsidised or free group insurance,
- Support in difficult life situations, e.g. in the form of psychological aid or benefits from the Company Social Benefits Fund.

Persons with disabilities (S1-12)

As a Group, we support the employment of people with disabilities and attach great importance to creating a friendly and supportive working environment. In accordance with ESRS S1-12, as a Group we report the percentage of employees with a disability certificate broken down by gender. This information is collected on the basis of certificates provided voluntarily by employees.

In Polish law, the definition of a person with a disability can be found in the Act on Vocational and Social Rehabilitation and the Employment of Persons with Disabilities of 27 August 1997. Such persons are entitled to special rights such as reduced working hours, additional breaks or adaptation of the workstation, which, as the Group, we provide to all employees with a disability certificate.

> Number and percentage of employees with a disability certificate as of 31 December 2024.

	Women	Men	Total
Number of employees with a disability certificate	159	49	208
Percentage of employees with a disability certificate	1.9%	1.2%	1.7%

Training and Skills Development metrics (S1-13)

As a Group, we consider employee development to be a prerequisite for our market success. In each Group Company, we have prepared 'customised' training courses to suit its business characteristics and the needs of the organisation.

In 2024, the number of training hours and the average number of hours per employee in the Group reflect our commitment to developing employee competence. The training programmes encompass the development of both professional skills and those related to responsible management, sustainability and compliance with legislation. As the Group, we ensure that all employees, regardless of gender, have equal access to training, reflecting our commitment to equal opportunities, inclusion, and professional development.

> Number of training hours provided to Group employees, by gender. Status as of 31 December 2024.

Gender	Number of completed training hours	Average number of training hours per employee
Women	291,380	36.7
Men	148,267	36.8
Total / average	439,647	36.8

> Number of training hours provided to Group employees, by employment category and gender. Status as of 31 December 2024

	Women		Men		Total	
	No. of training hours completed	Average no. of training hours per employee	No. of training hours completed	Average no. of training hours per employee	No. of training hours completed	Average no. of training hours per employee
Senior management	4,584	58.0	5,578	41.9	10,162	47.9
Middle management	19,169	21.3	13,740	21.0	32,909	21.1
Other employees	267,628	38.5	128,950	39.7	396,577	38.9
Total / average	291,381	36.7	148,267	36.8	439,647	36.8

> Percentage of employees that participated in regular performance and career development reviews in 2024, broken down by gender and employment category. Status as of 31 December 2024.

	Women	Men	Total
Senior Management	87	150	237
Middle Management	856	622	1,478
Other employees	6,038	2,962	9,000
Total number of employees that participated in regular performance and career development reviews	**6,981**	**3,734**	**10,715**
% of employees that participated in regular performance and career development reviews	**88.0%**	**92.7%**	**89.6%**

The ratio of performance and career development reviews actually carried out against planned reviews as of 31 December 2024 was 96.4% – we have not included reviews that did not take place due to employee departures or long-term absences in the analysis. The number of reviews actually conducted per employee during the reporting period (calculated as the number of reviews conducted relative to the number of Group employees) is 0.90.

Health and safety metrics (S1-14)

In 2024, we did not record serious or fatal accidents in the Group. Work-related hazards that could pose a serious risk include bank robbery, traffic accident, fire, terrorist attack and electrocution. In 2024, none of these hazards resulted in serious injury to our employees. Due to data collection limitations, we do not have complete information on potential accidents or injuries involving non-employees, but no such incidents were reported to us.

> Accidents (incidents) at work. Status as of 31 December 2024

Number of fatalities as a result of work-related injuries and work-related ill health	0
Number of recordable work-related accidents	39
Rate of work-related accidents per million hours worked	2.06
Number of cases of recordable work-related ill health	0
Number of days lost due to work-related injuries and poor health related to work	1,012

The following table presents key indicators related to occupational health and safety (OHS) in the Group. The data includes both the number and rates of occupational accidents and related health issues during the reporting period:

- Number of fatalities as a result of work-related injuries and work-related ill health – this indicator includes the number of individuals who died as a result of work-related injuries or as a result of work-related ill-health. This data includes both employees and others working at the unit's locations, provided that the incidents were work-related and duly reported."
- Number of recordable work-related accidents – the number of accidents that occurred in the course of performing work duties and which, in accordance with current legislation, must be reported to the relevant authorities.
- Rate of recordable work-related accidents – this rate measures the number of reportable accidents per million hours worked by employees.
- Number of cases of recordable work-related ill health – the number of cases of work-related ill-health that must be reported under the law. Includes cases of occupational diseases such as musculoskeletal disorders, circulatory problems.
- Number of days lost due to work-related injury and work-related ill-health – the number of days on which employees were absent due to work-related injury or ill-health. Full calendar days are included, regardless of whether they were working days, weekends or public holidays. The methodology for collecting this data is limited because of the way in which cases are reported and documented, as well as because of data protection issues.

Work-life balance metrics (S-15)

As the Group, we make effort to ensure that our employees are supported in balancing work and family responsibilities. In 2024, all employees were fully entitled to take various forms of family-related leave, including maternity, paternity, parental and carer's leave. These types of leave include time spent caring for newborn children, absences for providing care to family members, or children who are ill.

In this section of the report, we present data on the percentage of employees entitled to take these leaves and the percentage of those who have actually taken them in 2024, divided by gender. This data helps us to understand how our family-friendly policies are put into practice and how we support employees in maintaining their work-life balance.

> Employees who took family-related leave in 2024 by gender

	Women	Men	Total
Percentage of employees entitled to family-related leave	100%	100%	100%
Percentage of employees who took family-related leave*	30.7%	16.4%	25.9%

** The calculation of this metric includes maternity, paternity, parental, childcare, adoption, and caregiver leave*

At the Bank and in Group companies, we use solutions that support employees' work-life balance. These are solutions that go beyond legal requirements, such as flexible working hours, hybrid working and additional hours or days off. For example, at the Bank we use solutions such as:

- Flexible working hours for parents of children under 8, as well as the possibility to temporarily reduce working hours,
- Hybrid working: remote working of 2-3 days per week (for positions where it is possible),
- Additional days/hours off: 21 days of additional leave after maternity or paternity leave has been taken, 1 additional day off provided there is no outstanding leave on 1 January, '2 hours for the family' for all employees.

Compensation metrics (pay gap and total compensation) (S1-16)

In the table, we present data on the salaries of employees in the Group as of 31 December 2024. The unadjusted wage gap has been calculated in accordance with the requirements of the ESRS – it takes into account the average gross hourly wage of all employees under employment contracts during the reporting period. This methodology enables a transparent and accurate assessment of the gender pay gap. Basic salary refers to the gross base salary explicitly stated in the employment contract. Full remuneration, on the other hand, includes both other fixed components of remuneration (e.g., allowances, fixed benefits) and variable components (e.g., bonuses, awards, or commissions). The unadjusted pay gap compares the pay of men and women employed at different grades and positions and in different locations. The indicator therefore presents a different value than the Equal Pay Gap indicator reported in section S1-5.

> Unadjusted pay gap as of 31 December 2024

Pay gap for basic remuneration	33.94%
Pay gap for full remuneration	34.50%

The total renumeration ratio reflects the relationship between total annual renumeration of the highest-paid person in the Group and the median of the total annual renumeration of all employees (with the exception of this highest-paid person). It takes into account all components of the highest-paid person's compensation (fixed and variable) awarded in 2024. The ratio of 1:73.77 includes the variable remuneration granted to this individual in 2024 for the year 2023 in its full value, including the portion deferred for five years and subject to additional conditions. However, if only the non-deferred portion, paid in cash, of the variable remuneration granted in 2024 for the year 2023 is taken into account, the ratio would be 1:40.82.

Incidents, complaints and severe human rights impacts (S1-17)

In 2024, we have not registered any cases of discrimination, including harassment, or serious incidents of human rights violations in the Group. Accordingly, no fines, penalties or compensation were imposed on the Group as a result of employee complaints.

Employees reported 15 complaints through internal channels for reporting violations. During the reporting period, we did not record reports brought to external bodies (to the national contact points for the OECD Guidelines for Multinational Enterprises).

Number of registered and confirmed cases of discrimination, including harassment	0
Number of complaints filed by employees through complaint channels, taking into account issues of discrimination or other violations	15
Number of complaints filed with National Contact Points for the OECD Guidelines for Multinational Enterprises	0
Total amount of fines, penalties and compensation paid as a result of discrimination incidents, including harassment and other complaints of labour rights violations	0
Number of serious incidents related to human rights violations	0
Number of serious labour-related human rights incidents that are cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the International Labor Organization Declaration, or the OECD Guidelines for Multinational Enterprises	0
Total amount of fines, penalties and compensation for damages resulting from incidents regarding respect for human rights related to an individual's workforce	0

3.2. Our customers – consumers and end-users (ESRS S4)

3.2.1 Impact, risk and opportunity management

Policies related to consumers and end-users (S4-1)

Impacts and risks for consumers and end-users

The ESRS S4 standard refers to the consumers and end-users, which in the light of the Group's activities means the customers who use our financial products and services. Customers, alongside employees, are at the heart of our activities and are the foundation of our 2024-2026 strategy.

Consumers and end-users are individuals who make use of bank accounts, loans, investment products or advisory services provided by us, but also our branches or online banking. We are committed to ensuring that our products and services meet their needs and comply with the standards of quality, security and transparency.

Customer relations are a priority for us, which is reflected in the results of the double materiality assessment. In terms of consumers and end users, impacts and risks were identified in the following areas:

- Information impact – as a Group we have an impact on retail customer awareness, information quality and data protection, the complaints and enquiries process and price transparency. We also identify in those areas risks related to cyber-attacks and other security breaches due to human error, insufficient price transparency or the claims process.
- Social inclusion – in this area, ensuring access to our products and services for all customers, including those belonging to the most vulnerable groups, is essential. We also make an impact by providing financial education and fraud protection.

We are aware that as a Group we depend on our clients – they are the basis of our business model, their trust is our top priority. In order to manage this dependency, the Group has risk management systems in place (described in more detail in the chapter 'Risk Management' in Consolidated Financial Statements of Santander Bank Polska S.A. Group for 2024), and we undertake a number of measures regarding the monitoring of clients' experiences, the protection of their data, and the transparency of products and services – these measures are described in more detail in dedicated subsections.

In the double materiality analysis process, we did not identify any material impacts that would be common and systemic. The identified impacts are related to the nature of the business. As Group, we do not offer products or services that: are inherently harmful to people or increase the risk of chronic diseases, products that negatively affect human rights in terms of freedom of expression.

In order to manage these impacts and risks, the Group has a number of policies in place to help us achieve our strategic objectives. We also carry out many activities, the effectiveness of which we measure on an ongoing basis.

Policies for managing impacts, risks and opportunities in customer relationships

The policies for impact and opportunities management in terms of customer relations apply to the entire Group, with the exception of Santander Factoring, which does not provide services to individual customers. The management of this area is addressed by policies that are broad in scope (covering all stakeholders concerning all stakeholders), and those that address specific elements of activity directly related to the management of impacts, risks, and opportunities in relation to customers.

All of the Group companies serving individual customers have the Customer Experience (CX) Management Policy in place, which is a key document governing the management of material risks and opportunities related to customers. The policy does not currently make specific provisions for particular groups of consumers, such as low-income, elderly or digitally excluded individuals, but its application takes into account the needs of such groups as part of overall operational activities The "Customer Experience Management Policy" is an internal document, however, the Bank's general approach to customer service and consumer relationship management is communicated on an ongoing basis through:

- the Bank's website,
- information sheets and handouts made available to customers,
- communication activities carried out through various channels, such as social media or e-mailing campaigns.

Other policies are also in place in the Group, to support the management of impacts, risks and opportunities in customer relations, including those addressing the issues of data protection, price transparency, counteracting digital exclusion and ethical sales. The highest-level body responsible for the implementation of policies is the Management Board, unless otherwise stated in the document. The Bank as well as certain Group companies (Santander TFI, Santander Leasing) implement the 'Consumer Protection Policy'. It describes the principles we follow with regard to:

- fair treatment of consumers,
- a customer-centric model for products and services,
- transparent communication with consumers,
- responsible sales practices,
- responsible pricing policy.

This policy defines vulnerable customers and how we identify and manage their needs. It also describes how we protect consumers from excessive levels of debt through responsible lending and how we conduct responsible debt collection and recovery. The document also sets out the principles for protecting customer data and preventing fraud and abuse. It defines the rules according to which we handle complaints. Finally, it touches on the issue of consumer financial education, including that in general and on banking products. We apply the principles of this policy at the stage of product and service design, communication and customer service. The Compliance department is responsible for ensuring that the Bank's decision-making bodies, including the Management Board and relevant committees, receive the information necessary for effective supervision of consumer protection issues.

According to the "Consumer Protection Policy", a vulnerable customer is a consumer who, due to his personal situation, is more exposed to negative effects or financial or personal losses than others. Indicators that a consumer may be vulnerable include, but are not limited to: disability, age-related limitations, incapacity to work, serious illness, low level of education, difficult economic or personal circumstances. We take sensitivity criteria into account in the design of products and services and in key processes that have a significant impact on consumers, such as fraud management, complaints handling, lending and debt recovery. Employees who interact with consumers are trained to be able to identify and serve vulnerable customers. It is monitored by the compliance function and the Management Board.

Additionally, we apply the "Product and Service Commercialisation Policy at Santander Bank Polska S.A.". It describes the acceptance process of new or modified products and services of the Group, as well as the process of monitoring throughout their life cycle. We are protecting consumers and mitigating the risks associated with our products and services with the help of this policy, including compliance, conduct and reputational risks. In line with this policy, we strive to offer products and services tailored to our clients' needs and we promote good sales practices. This document sets out the decision-making process that precedes the release of products and services for sale. This includes both feedback from the relevant specialist units and decision-making, in which the Local Product Marketing and Monitoring Committee (LMMC) plays a key role. Our policy for the commercialisation of products and services describes the principles that relate to:

- fair treatment of customers,
- employees training ensuring they possess adequate knowledge of the products and services they sell and the risks associated with them,
- educating customers to help them choose the right products and services and to understand how they work,
- protection of customers' personal data,
- prevention of financial crime,
- responsible implementation of innovation (without loss to customers),
- policies on employee remuneration designed to protect customers, including linking employee performance appraisal to the quality and effectiveness of service in relation to risk management and control.

> List of policies for managing impacts, risks and opportunities in terms of customer relations (MDR-P)

Policy	Description of content	Scope of application of the policy and exclusions
Customer Experience (CX) Management Policy	The aim of the policy is to increase the customer-centric maturity of the bank and its employees and to effectively manage the process of building positive customer experience. It describes the process of managing the customer experience. ***Addressed IRO:*** *Failure to guarantee the financial well-being, utility and accessibility of financial services to clients by not establishing ~~g~~ introducing product modifications and/or not monitoring their effective implementation, lack of adequate coverage and usefulness of products for the whole society and/or contributing to the creation of obstacles in accessing financial products resulting from the process of designing products and services.*	Group (excluding Stellantis companies)

Responsible Banking and Sustainability Policy	The policy emphasises our commitment to creating value for customers by promoting responsible banking practices that take into account environmental, social and governance aspects. ***Addressed IRO:*** *Lack of access to products and services for vulnerable clients due to a lack of identification of products and/or services in the catalogue that violate the principles of inclusivity and/or accessibility, lack of adequate coverage and usability of products for the whole of society and/or the creation of obstacles to access to financial products resulting from the design process of products and services.*	Group (excluding Stellantis companies)
Brand and Marketing Policy	The Policy sets out the criteria for defining and regulating strategy and for executing and controlling the brand and marketing management function. The purpose of the Policy is to establish the rules for the operation of the marketing function, to ensure the consistency of the Santander brand and to establish the rules of cooperation within the global Santander Group in the field of marketing and branding. The document sets out uniform principles, responsibilities and key processes in the area of brand management, marketing and communication. ***Addressed IRO:*** *Failure to guarantee price transparency for clients resulting from the Bank committing price abuses without prior notification or justification, The risk arising from the Bank's committing price abuses without prior notification or justification, resulting in the lack of guaranteed price transparency for clients.*	Group (excluding Santander Consumer Bank and Stellantis companies)
Policy of 5 Principles of Cybersecurity	The Policy promotes responsible use of IT resources by the Bank's employees, based on five key principles of cybersecurity. Its purpose is to minimize the risk of information loss or leakage and to protect IT resources against cyber threats. ***Addressed IRO:*** *Education of retail clients about online risks and how to mitigate them, Quality of information and data protection are not guaranteed to sensitive clients in terms of how their data is used, stored and shared, or does not provide sufficient understanding by the client of how the data is used, Lack of client privacy protection resulting from the database infrastructure and the data management software used by the Bank to host an manage all operations, Risk of cyber-attacks threatening the privacy of client data, Risk of serious security breaches causes by malicious practices or human error committed by employees, such as the use of unauthorised software, technical user violations, information exfiltration or leakage, Risk arising from violation of data protection regulations for vulnerable clients.*	Group (Stellantis has implemented its own regulations in this regard)
Policy for handling complaints, inquiries and cause analysis	The document defines the principles related to the handling of problems reported by current and potential customers (enquiries, complaints reported through various channels) and to the analysis of the causes of complaints. ***Addressed IRO:*** *Inquiries, complaints and client claims are not processed and do not result in necessary changes and modifications due to a lack of systems and processes, Risk resulting from not processing and addressing inquiries, complaints and client claims due to a lack of effective systems.*	Bank
General Code of Conduct	The document defines ethical standards and rules of conduct to be followed by all Group employees, including in relations with customers (e.g. in the context of the sale of banking products and services, gifts and invitations, conflicts of interest). ***Addressed IRO: Failure*** *to guarantee price transparency for clients resulting from the Bank committing price abuses without prior notification or justification.*	Group (Stellantis has implemented its own regulations in this regard)
Consumer protection policy	Defines a vulnerable customer and sets out principles for working with a vulnerable customer ***Addressed IRO:*** *Lack of access to products and services for vulnerable clients due to failure to identify products and/or services in the catalogue that violate the principles of inclusivity and/or accessibility, Failure to provide additional conditions for vulnerable clients in debt collection or recovery processes due to incorrect identification, Fraud against vulnerable clients resulting from lack of preventive transaction monitoring among people with legal guardians, Risk to vulnerable clients resulting from breach of data protection regulations.*	Bank, Santander Leasing, Santander TFI
Product and service commercialisation policy	The process of acceptance of new or modified products and services of the Group, as well as the process of their monitoring in their life cycle. The Management Board and the Supervisory Board are responsible for the policy. ***Addressed IRO:*** *Lack of adequate product coverage and utility for general public and/or the creation of obstacles to accessing financial products as a result of the product and service design process.*	Bank, Santander Leasing, Santander Factoring, Santander TFI

Actions on significant impacts on consumers and end-users and applying approaches to manage significant risks and opportunities related to consumers and end-users, and the effectiveness of these actions (S4-4) (MDR-A)

In 2024, we have taken a number of actions to manage significant impacts related to consumers and end users. We are implementing these activities on a continuous basis and will continue and adjust them in future years For more details on ongoing activities and initiatives in the area of consumers and end-users, see subsections S4-1, S4-3.and Chapter VI, "Customer Relations" and Chapter VIII, "Business Development in 2024".

Customer Experience Management

Taking care of customer satisfaction is one of the key elements of our strategy. This dimension describes the Total Experience strategic direction, in which we have adopted the Net Promoter Score (NPS) as the main measure of customer experience. We manage it systemically, in line with the Group's 'Customer Experience (CX) Management Policy'.

In accordance with the provisions of the policy, we conduct regular NPS and customer satisfaction attributes surveys for all business segments. Our knowledge about the customer is also enriched by other sources, e.g. additional research on contact channels, analysis of complaints or the customer's voice in social media.

Based on this information, each of the business segments defines priorities and develops an annual action plan. We identify both positive and negative impacts on clients in order to manage them accordingly. Progress towards customer satisfaction goals is monitored on a quarterly basis including the with the involvement of the Management Board.

The CX policy not only describes the process of managing customer satisfaction in the Bank, but also formalises a set of mandatory customer-centric standards regarding communication and plain language, service across all channels, and research and design of solutions for customers. The role of standards is to continuously improve the quality and consistency of the customer experience, regardless of the communication channel they choose.

As a Group, we have adopted an approach that we call "customer-centricity". In line with our strategy, we aspire to be a market leader in terms of service quality, focused on the needs and expectations of customers. The standards we have adopted include:

- the "Compass" product and service design standard, which is based on modern customer-centric principles of design,
- the “Rzecz jasna” (“Clear Thing”) standard of simple communication , which we have implemented both in the process of exchanging information with customers and internally,
- the standard of empathetic service, in which it is increasingly important to combine digital solutions with in-branch customer service.

Customer service standards apply to every stage of the customer relationship cycle – from the moment of interest in our offer to the end of the business relationship. In accordance with the "Santander Bank Polska S.A. Information Policy", we are committed to reliable, comprehensive and timely communication to customers, both current and potential, in terms of the services and products offered, as well as information about the Bank's financial condition. The overriding aim of communication with the customer is to enable them to fully understand the principles and the offer of the Bank, so that they can consciously and responsibly make decisions about the use of specific products. We inform our customers about changes in our products and services, in compliance with statutory and contractual deadlines, Bank's range of products and services, rules for using products and services, and we respond to our customers' inquiries and doubts.

Selected principles of customer service standards in the Group:

We communicate with customers in a simple and understandable way

We support the financial education of clients and inform them about the cybersecurity rules

We respect the diversity of our customers and support people with disabilities – so that everyone feels comfortable in our Group

We help customers even with matters unrelated to the Bank. We do for them more than they expect on our own initiative

We recommend modern and eco-friendly solutions for paperless operations

We provide information about charitable activities and encourage customers’ participation

Human rights in relation to customers

As part of our commitments to protect human rights in relations with customers and end users, as a Group, we rely on the provisions of the "General Code of Conduct" and the " Responsible Banking and Sustainability Policy". The latter document includes a comprehensive approach to managing issues related to human rights, sustainable development and stakeholder responsibility.

In the area of customer relations, as a Group, we are committed to:

- Equal treatment of customers: regardless of origin, gender, age, religion or social status, all customers are treated fairly and equally, in accordance with the principles of responsible banking.
- Privacy and personal data protection: A key element of the policy is to guarantee the security of customer data, in accordance with the law, including the GDPR (as implemented under Polish law), and international privacy standards.
- Responsible marketing: we strive to present our products in a fair, transparent and understandable manner, in accordance with the principles of ethics and transparency.
- In addition, our human rights policies and activities are aligned with international standards, such as:UN Guiding Principles on Business and Human Rights,
- Universal Declaration of Human Rights,
- OECD Guidelines for Multinational Enterprises,
- Principles of Responsible Banking (UNEP FI).

In the period from 1 January to 31 December2024, no incidents of human rights violations were recorded in the Group. The Group has policies in place to manage the impact on the consumer and end-user, including human rights. These processes include responsible sales principles, data protection, and complaint reporting and handling mechanisms – detailed information can be found further down in the statement.

Transparent communication

We understand that transparent communication is one of the key elements of effective cooperation with the client. We know how important it is to communicate effectively, have clear rules and regulations and listen to the voice of the customer and learn from them.

In the Group, the standards for communication with customers are defined by:

- "Brand and Marketing Policy", which sets out uniform principles, responsibilities and key processes in the area of brand management, marketing and communication.
- "Customer Experience Management (CX) Policy", which defines a communication system to provide customers with a consistent experience related to the Santander brand.

In the creation of information materials, marketing communication and organisation of events, we are guided by the principle of honest and complete information about the Bank's and the Group's products. We create communication with customers in a clear, simple and understandable way, taking into account the characteristics of the target group, including all mandatory information resulting from regulations and standards set by financial supervisory authorities. Information and advertising materials concerning the products and services offered by the Bank are prepared and made available in accordance with the applicable regulations and fair competition principles.

The Bank is a signatory of the "Code of Banking Ethics" and the "Banks' Declaration on the Plain Language Standard". We systematically introduce the principles of plain language in contracts and other documents, resulting in their becoming more understandable and readable for customers. When preparing communication, we are guided by the principles of consistency, coherence, transparency and neutrality.

We align communication, marketing, and sales practices with applicable law and the ethical standards. We are committed to:

- informing about significant changes in regulations and guidelines (in the form of messages in the mobile and web application),
- monitoring the implementation of regulatory projects,
- applying procedures for the approval of new products and significant changes in products,
- verifying model contracts, communication and advertising, procedures and training, and periodically monitor processes and products.

The general rules for preparing and verifying marketing materials are also set out in the "Handbook of Advertising and Marketing Communication of Santander Bank Polska S.A.". Detailed standards for a given product group are included in the guidelines developed by the Financial Crime Compliance and Prevention

Division. The basic principle is that the marketing material should be reliable, honest, true and written in an understandable and simple language, adapted to the recipient. Before publication, each material is verified to ensure that it meets the standards described in the guidelines. In addition, training and workshops are held periodically for units preparing marketing communication, which strengthen the knowledge and skills of employees.

At the Bank, we are also aware of the fact that customers' decisions to purchase products are increasingly dictated by the desire to reduce the impact on the environment or to have a positive impact on it. We want to provide customers with reliable and honest information that they can rely on when making purchasing decisions. Therefore, we apply the "Sustainability Communication and Advertising Guidelines". We review business projects and new product proposals for greenwashing at an early stage of preparing the offer to make sure that the change does not generate the risk of misleading the customer or greenwashing.

As part of our efforts to improve the quality of communication, the Bank conducts regular language audits to assess the degree of simplicity of the language used in both internal and external communication. The audit is based on the PLI (Plain Language Index), which measures the compliance of the content with the principles of simple and understandable language. We analyse representative samples of texts, including content published on the intranet, formal documents, agreements, responses to complaints and materials available on the Bank's website. This process identifies areas for improvement, in particular in terms of eliminating banking jargon and using more accessible wording.

These activities are in line with the Bank's strategy, which is aimed at transparent and friendly communication with customers and improving the experience related to the use of financial products and services.

Security of services, transactions and customer data

Due to the nature of our business, we process significant amounts of customer personal data and other confidential and sensitive information. Maintaining standards of customer data security is one of the key areas for us to build trust in the strategic direction of "Total Responsibility".

In our Group, we have implemented a number of regulations relating to the principles of protecting the security of our customers' services, transactions and data. The overarching one is the "Principles of Corporate Governance in the Field of Cybersecurity". These are the rules, tasks, and responsibilities, but also the processes and elements of supervision for managing this area for all Group Companies. In addition, we implemented in the Group the "5 Principles of Cybersecurity" Policy, which aims to promote responsible use of the Internet and IT resources by our employees. We know that every employee has a part to play in the protection of personal data, which is why the policy is available on the intranet and all employees, regardless of seniority, are obliged to know its provisions. The implementation of this goal is monitored by regular phishing tests, which provide a practical educational element for employees – thus, they learn the techniques used by cybercriminals.

We meet national and EU standards for data protection against cyber threats. The information security management system is certified in accordance with ISO/IEC 27001:2013 and includes supervision over information security in the Group's business environment and assessment of specific requirements for information and IT systems security.

We monitor regulations and technologies related to IT security and adapt our systems to changing conditions on an ongoing basis. This allows us to continuously improve our internal transaction systems and tools that our clients use on a daily basis.

The security of customer data is our priority, which is why we strive to raise awareness of today's cyber threats. As a Bank, we conduct regular education campaigns, using various communication channels, including those that reach customers who are less active on the Internet:

- **Online and mobile banking educational campaigns** – CRM campaigns are carried out every month, targeted at individual customers and SMEs, which reach about 3 million users.
- **Social media** – we regularly publish cyber-educational posts on social media (Facebook, Instagram) every two weeks as part of the "Don't believe in fairy tales for adults" ("Nie wierz w bajki dla dorosłych") campaign and, if necessary, warnings. The reach of these activities exceeds 2 million users and includes both customers and other Internet users.
- **"Don't believe in fairy tales" ("Nie wierz w bajki") campaign** – in October 2024, we expanded our education campaigns to include radio to reach less digitised customers.
- **Website and support tools** – we regularly update the security website and promote the use of the CyberRescue tool.
- **Programme for seniors** – The Santander Bank Foundation launched the "Independent and safe seniors online" programme.
- **Nationwide campaigns** – we cooperate with the Polish Bank Association, for example on the nationwide campaign 'Watch out for cybercriminals – don't let yourself get robbed' ("Uważaj na cyberprzestępców – nie pomagaj się okraść"), and with the Warsaw Institute of Banking, on cyber-educational activities addressed to young people and students.

Activities addressed to employees:

- **Adaptation program:** we implement a monthly training program (over 1,000 participants) in the field of cybersecurity for new employees of the Branch Network, CWB, and Multichannel Communication Area.
- **Education on the intranet:** we regularly publish content on the intranet about current cyber threats and cyber events at the Bank.
- **Phishing tests:** hands-on tests allow employees to enhance their ability to recognise suspicious messages.
- **CyberOctober:** During Cybersecurity Month, we organized webinars and other educational initiatives with experts.

Inclusive banking

In the Group, we adapt our offerings, services, and communication systems to meet the needs of all customers. Our services are available through traditional branches, digital channels, and a network of self-service devices. Accessibility is enhanced through the 'Barrier-Free Banking' program, which has been consistently implemented by the Bank since 2010. The program aims to ensure access to the Bank's offerings for customers with various needs, including people with disabilities and special requirements. All branches and partner outlets follow the 'Barrier-Free Banking Standards.' Partner branches and Bank branches are equipped with magnifying glasses and signature frames to assist visually impaired and blind customers. Customers who are unable to read or write can receive advisor support in confirming their intent. In partner outlets, Bank branches, and remote channels, customers can connect online with an advisor fluent in Polish Sign Language (PJM).

Branches are designed and retrofitted according to accessibility guidelines. Solutions used there include, among other things, portable induction loops and independent access for wheelchair users or people with individual needs.

Remote channels – including online and mobile banking, as well as the www.santander.pl portal – are continuously developed and tested for accessibility for all customers, including people with disabilities. In accordance with the Act on Ensuring Accessibility for People with Special Needs, the Bank provides accessible documents upon request, including non-personalized contract and regulation templates.

More details on the barrier-free service and digital accessibility solutions can be found in point 3, Chapter VI "Relations with customers".

Legal and administrative proceedings involving clients

In 2024, there were legal and administrative proceedings relating to our business in the context of customers rights.

The ongoing court cases mainly concerned historically granted CHF-denominated and CHF-indexed mortgage loans. These matters are described in detail in Chapter X 'Financial performance in 2024'.

In 2024, the court of appeal issued ruling regarding the financial penalty imposed on the Bank by the Office of Competition and Consumer Protection (UOKiK) in 2020. The penalty related to provisions in annexes to CHF- and EUR-denominated mortgage agreements concerning the rules for determining foreign exchange buy and sell rates. The Court of Appeal ruled that the violation was unintentional and reduced the penalty from PLN 23.6 to PLN 5.9 million. The Bank published information about the decision on its website, paid the fine, and filed a cassation appeal.

Additionally, in 2024, the Financial Ombudsman imposed a minor financial penalty on the Bank due to an incomplete response to a customer complaint. The Bank paid the required penalty.

In addition, there were ongoing administrative proceedings of the UOKiK against the Bank, which concerned:

- principles of processing unauthorized payment transactions / customer reports of unauthorized payment transactions,
- determination of whether patterns used in consumer trade contain prohibited contractual provisions with regard to changes in rates of fees and commissions for banking activities and modification of other terms of the agreement during its execution,
- early repayment of mortgages, in which the OCC examines whether banks settle correctly with consumers. The proceedings concern settlement after full or partial repayment of a mortgage loan.

In addition, in 2024 the Financial Ombudsman fined the Bank a small value due to an incomplete response to a customer complaint. The Bank paid the due penalty.

In the context of customer data privacy, the Office for Personal Data Protection (UODO) imposed a financial penalty of PLN 1.44 million on the Bank in 2024 for failing to provide information about the data breach in 2018. The Bank appealed against the decision to the Regional Administrative Court. In addition, the

President of the UODO issued 9 warnings against the Bank concerning matters of non-financial nature. The Bank appealed against 7, for which, and accepted 2 of them, appropriate corrective measures have been implemented.

In 2024, the Office of Competition and Consumer Protection conducted 2 proceedings against Santander Consumer Bank:

- A proceeding regarding practices infringing collective consumer interests, which concerned unauthorized transactions,
- A proceeding related to an appeal against a UOKiK President's decision (court proceedings) – this involved an individual customer offer and the inclusion of insurance in the total cost of credit.

As a result of a hacker attack on the IT infrastructure of the PGD Group (Santander Consumer Bank intermediary), documents containing personal data were stolen and then made public on the Darknet.

In May 2024, the Bank detected unauthorized access to a Santander Group database hosted by a third-party provider. In the case of Poland, the data breach did not involve customers, but employees and job applicants. We informed the President of the Office of Personal Data Protection of the breach and took appropriate steps to minimize the impact on those whose data was leaked and to prevent similar cases in the future.

Processes for engaging with consumers and end-users about impacts (S4-2)

The cooperation with customers in our Group is regulated by the "Customer Experience Management (CX) Policy", which sets out the rules for diagnosing customer needs, improving their experience, as well as monitoring and reporting progress. The Management Board is responsible for the implementation and execution of this policy, but the operational responsibility for individual initiatives is decentralised.

To manage customer impact, we want to understand their needs and the quality of the experience we provide. The diagnosis of customer needs is carried out through various forms of information collection, which we use to improve the quality of our services. Sources of information include:

- Strategic research, which identifies trends and values important to customers, is taken into account in the process of initiative planning to improve their experience.
- Supporting research, conducted on a continuous basis or for specific projects, to monitor customer sentiment and socio-economic developments.
- Design research, carried out in accordance with the Compass standard, which allows for the identification and verification of hypotheses regarding customer needs, target groups and usability of products and services.
- Data collected from other touchpoints, such as complaints, social media comments, phone calls, in-person reports, and analytics from banking systems.

All these activities are aimed at ongoing monitoring and adapting the Group's products and services to the needs of our customers. Customers are involved in the various stages of product and service design – exploration, design, testing, and monitoring. We ask for customer opinions as part of ongoing research (e.g. in relational or benchmarking research) and research related to specific initiatives. We make the results of the research available to employees, including in the form of the "Voice of the Customer" dashboard, reports, databases and repositories, webinars and newsletters, along with actions recommended actions. In addition, the Bank implemented the research and design standard "Compass" explaining how and at which points along the design path research should be conducted.

Customers' needs, aspirations, problems and requirements are the foundation for the initiatives we undertake. One of the key metrics by which we assess the satisfaction and the extent to which we respond to the fulfilment of customer expectations is the Net Promoter Score (NPS), which operates across all companies of the Group that provide services to individual clients.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

We strive to ensure that all our products and services benefit consumers and end-users, but we recognise that not all activities or processes are without the risk of negative impacts. Therefore, within the Group, we pay particular attention to providing our customers with easy access to effective mechanisms for reporting concerns and complaints, as well as transparent remedial procedures.

In July 2024, the Bank implemented the "Policy for handling complaints, inquiries and cause analysis", which covers the receipt of complaints, distribution of tasks between units, evaluation of complaints, communication with customers, monitoring request, inspections and analysis of the reasons for complaints. The compliance unit is responsible for interpreting the policy, and the Management Board for its approval.

All Group companies offer contact channels enabling consumers to raise concerns and obtain answers quickly and in accordance with the standards of customer service. Detailed information on complaint procedures and available channels for reporting concerns is available on the websites of each Group company. The channels for accepting and investigating complaints are described in the terms and conditions of individual products (and for loans, in the loan agreements). These are for instance:

- Online forms available on the websites of the Group companies,
- Telephone helpline, available in Poland and abroad,
- Mobile apps and online banking services,
- Traditional branches of the Bank and Group companies as well as partner branches, where it is possible to file a complaint in person,
- Video calls and chat for deaf people (service available on the Bank's website),
- E-mail addresses for filing reports and complaints,
- Traditional postal correspondence, in which customers can send their messages in writing to the address specified by the particular Group company.

The process of registering and monitoring complaints in the Group differs depending on the Group's entity, but all activities are conducted in accordance with the applicable laws and internal regulations. For each entity, the process of registering reports is precisely defined, which allows for effective monitoring of their progress and ensuring timely responses. The Bank's customers can receive a response in the form of a letter or a message sent via online or mobile banking. They are informed about each stage of the process (receiving the complaint, closing the case and providing the response) by text messages. In the event of a longer complaint evaluation time (more than 5 and 10 days), customers receive additional SMS notifications.

In 2024, the Bank continued its efforts to shorten the response time to complaints and improve the quality of communication. Thanks to automation, simple cases are resolved faster, which streamlines the service process. Responses to complaints are prepared in an accessible, understandable way, free from banking jargon – in accordance with accepted simple language standard. If the complaint is not accepted, the Bank informs customers about the appeal process – internally to the Customer Ombudsman, or to external institutions. At the Bank, all customer reports are registered and monitored in the Bank's internal complaint system. The system enables a thorough analysis of notifications, response time and effectiveness of the actions taken. This allows us to identify areas for improvement. To ensure the effectiveness of the process, we analyse complaint trends and incidents that cause an increase in the number of complaints. This information is reported quarterly to the Management Board and the Supervisory Board and discussed once a year at the meetings of the Management Board and the Audit and Compliance Committee.

We work to provide remedies when we identify a negative impact on customers. The Customer Ombudsman's Office has a key role in this regard, dealing with more complex cases, including the third and subsequent complaint on the same issue. The Office also responds to reports from regulators and institutions, such as the Polish Financial Supervision Authority (Komisja Nadzoru Finansowego), the three or more complaints Financial Ombudsman (Rzecznik Finansowy) or the Banking Arbitrator (Arbiter Bankowy) hen a customer's complaint is accepted as justified, we reimburse the amount charged.

We provide that our complaint process is in line with the Group's customer service standards – we try to ensure that customers trust the channels for reporting breaches and guarantee that there is no retaliation.

	2024
Number of complaints from customers and end users in the reporting period	254,407
Ratio of complaints considered justified (%)	21.74%
Average Complaint Response Time (days)	5.18

The average complaint response time for our Group is calculated as a weighted average of the number of days it takes to process a complaint, weighted by the total number of complaints received from consumers and end users during the reporting period. The complaints concerned various areas of activity – depending on the Group company- in the Bank, the most frequent issues were related to: fees and commissions (including account maintenance fees and card fees), fraudulent transactions and ATM transactions. At Santander Consumer Bank, complaints most often concerned provisions of loan agreements, while other Group's companies were mainly concerned with issues related to insurance and fee calculation processes.

3.2.2 Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

The most important objectives we have set for our customers stem from the "Total Experience" direction in our strategy. These are:

- A unique organizational culture where customer and employee experience are equally important.
- A unique process of creating solutions with users – we are an organization that focuses on human needs, which is our competitive advantage, we provide pragmatic value and a positive emotional relationship with customers and employees.

We measure the progress of achieving these objectives on a quarterly basis using strategic indicators and operational indicators contributing to strategic indicators. We set goals in a one-year and three-year perspective. Thanks to this, we can identify deviations from the plan and react in a timely manner to them. The results are discussed at the meetings of the Management Board and the Supervisory Board.

Our strategic goal (MDR-T) is to achieve a TOP 2 in the Net Promoter Score (NPS) within the banking sector (for individual client) in Poland. This target relates to the Bank's individual customer segment and is set for 2026, in line with the time horizon of the "We Help You Achieve More" strategy. The NPS indicator measures the loyalty and satisfaction of the Bank's customers and is an important measure of the strategy. It allows for an analysis of the overall customer experience and their willingness to recommend the Bank's services. NPS is measured on a scale of 0-10, where promoters are responses of 9-10 and detractors are responses of 0-6. 2023 was taken as the base year with an NPS score of TOP 3. Monitoring of the progress of the target is carried out quarterly and is currently on schedule – in 2024 we also achieved a TOP 3 position.

We develop operational goals in the area of customer experience (CX) based on:

- Net Promoter Score (NPS) results.
- Analysis of customer requests and complaints, which help us monitor customer satisfaction and indicate key challenges in service, products and services.
- Benchmark, relational, transactional research, as well as brand image research.
- Monitoring the quality of processes and services provided to customers in branches, ATMs, and digital channels.

We regularly track the performance of our metrics, analyse trends in requests and customer feedback to assess the impact of the measures we implement. We use the results of the analysis to design new solutions, which are tested as part of the policy with the involvement of customers. These changes include both improvements in service processes and modification of the product offer, always taking into account the feedback of our customers.

3.3. Affected communities (ESRS S3)

3.3.1 Impact, risk and opportunity management

Policies related to affected communities (S3-1)

Impacts and risks associated with affected communities

In the area of affected communities, we have identified our significant impacts in terms of their economic, social and cultural rights. These are indirect impacts through the business customers we serve, in particular those to whom we provide financing. This impact may be related to customers who operate in industries with high environmental and social risk, or those who act contrary to the law or ethical standards.

Communities that the Group has an impact on through the business customers it finances or serves:

- Local communities affected by investment projects financed by the Group (e.g. mining or industrial plants).
- Communities influenced by the Group's business customers who operate in high-risk industries in a social and environmental context.
- Communities influenced by the Group's business customers who do not comply with ethical standards or community rights (e.g. human rights).

In the Group, we are committed to conduct our business with respect for the rights of the communities affected by our activities, both directly and indirectly through cooperation with business partners and financing investments. Social responsibility is also an integral element of the Group's strategy for 2024-2026, in which we commit to supporting society through education, counteracting financial exclusion and implementing social activities.

As part of our policies and standards, we strive to minimize the negative impact on communities, while strengthening activities that generate positive effects for them. We place great value on compliance with international standards on human rights and the principles of social responsibility.

The key policies that govern our approach to managing impacts on communities are those related to human rights, counteracting the negative effects of investments and involvement in the life of local communities. Some of them are available on the Bank's website. The Management Board is responsible for implementing the policies (unless otherwise stated in the text).

Human rights are addressed first and foremost in the "Responsible Banking and Sustainability Policy". It addresses topics like the impact on communities through customers and our commitment to due diligence in managing social impact. It refers to the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the Equatorial Principles. The policy is approved by the Management Board and the matters regulated therein are discussed by the ESG Committee and the ESG Forum. In 2024, we recorded no serious human rights issues, nor incidents related to affected communities.

> Policies to manage significant impacts, risks and opportunities related to communities (MDR-P)

Policy	Description of content	Scope of application of the policy and exclusions
Social, Environmental and Climate Change Risk Management Policy	Describes the Group's policy on investing, providing financial products and services to clients operating in sectors such as oil and gas, energy production and transmission, mining, metals, soft raw materials. The policy is supervised by the ESG Risk Management Office. ***Addressed IRO:*** *Lack of protection of affected communities through lack of mechanisms to monitor and review compliance of the use of proceeds related to sectors and activities with high risk of impact on environmental and social issues, Financing of clients involved in activities considered prohibited, contrary to the Bank's policies and ethical standards, may pose a risk to society.*	Bank, Santander Factoring, Santander Leasing, Santander TFI
Corporate governance principles for responsible banking	Define common principles, roles and responsibilities, key processes as well as governance and supervision structure for responsible banking activities. The Management Board and the Supervisory Board are responsible for the document. ***Addressed IRO:*** *The policy generally addresses all impacts identified for the area of affected communities.*	Group (excluding Stellantis companies)
Responsible Banking and Sustainability Policy	Covers issues such as social inclusion through financial education, the right of communities to live in a healthy and clean environment, mitigation and management of environmental and social impacts. ***Addressed IRO:*** *The policy addresses all impacts identified for the area of affected communities.*	Group (excluding Stellantis companies)
Sensitive sectors financing policy	Sets out specific terms for financing clients from certain sensitive sectors, where reputational risk is increased. This policy applies to industries like the gambling and sports betting industry, the cannabis industry and the tobacco industry. ***Addressed IRO:*** *Financing clients involved in activities considered illegal, contrary to the Bank's policies and ethical standards, may pose a threat to society.*	Bank, Santander Factoring, Santander Consumer Bank
Defence sector policy	Lists prohibited and restricted activities, like controversial weapons, production or trade in dual-use weapons and technologies, and also compliance with international sanctions and conventions. ***Addressed IRO:*** *Financing clients involved in activities considered illegal, contrary to the Bank's policies and ethical standards, may pose a threat to society, Human rights are not guaranteed due to the financing of activities in which past and repeated incidents are known to have occurred without prior validation processes.*	Bank, Santander Factoring, Santander TFI (Santander Leasing implemented their own regulations in this regard)
Reputational risk management policy	The document describes how we manage the risks associated with a negative impact on the Group's image, including issues of perception by key stakeholders.	Bank, Santander Factoring, Santander Leasing, Santander TFI

Subsidies policy	The policy sets out criteria for beneficiaries and purpose-related donations (i.e. human rights, education, science, job creation, innovation, entrepreneurship, research, human well-being and social development, etc.).	Bank, Santander TFI
Corporate Culture Policy of Santander Bank Polska Group	Defines and supports employee volunteering activities through volunteering and delivering initiatives that improve society and support the voluntary sector in specific areas. The Management Board and the Supervisory Board are responsible for the policy.	Group (excluding Stellantis companies)

Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions (S3-4) (MDR-A)

The Group engages in responsibly managing responsible management the impact of our activities on communities. This impact can be direct, as in the case of our social activities, or indirect, through the business customers we serve, particularly those to whom we provide funding for. In 2024, we took a number of actions to manage significant impacts on affected communities. We are implementing these activities on a continuous basis and will continue and adjust them in the years to come. For more details on ongoing activities and initiatives, see the following subsections and Chapter IV “Development strategy.”

Impact on communities through customers

The impact we have on communities through our business clients is managed in two ways: we finance companies that pursue social goals, and we manage the risks associated with serving companies.

We finance companies that have a positive impact on communities, including in cooperation with development banks. In 2024, we signed an agreement with the European Investment Bank Group to securitise a portfolio of lease assets. We have committed to use the capital freed up by the transaction for additional financing of enterprises, with a particular focus on green and social assets. In the social area, the supported goal concerns the development of women's entrepreneurship. The cooperation will enable the mobilisation of a total of up to PLN 5 billion of new financing, of which at least one third will go to companies owned or run by women, or those offering products that address the effects of gender inequality. This is the largest transaction of its kind in terms of commitment made by the European Investment Bank (EIB) and the European Investment Fund (EIF) in cooperation with a commercial bank.

In the area of risk management, our activities address three main matters:

- community impacts associated with the investment projects we fund,
- impacts on communities related to the activities of the business clients we manage in relation to environmental, social and climate change risks,
- impacts on communities related to the activities of business clients we manage in relation to reputational risk.

With regard to the financing of investment projects, the Banco Santander Group is a signatory to the Equator Principles. The Bank has a procedure in place which, for projects financed by the Corporate and Investment Banking Division, implements the Equator Principles into a specialised process of assessing the environmental and social risk of projects. In addition, our internal regulations, ‘Responsible Banking and Sustainable Development Policy’ and ‘Social, Environmental and Climate Change Risk Management Policy’, are based on the Equator Principles. These principles are voluntary guidelines for financial institutions and concern the identification, assessment and management of environmental and social risks when financing projects. The Equator Principles define specific financing parameters that should be included in the study. These criteria to the total investment cost of the project (from 10 million USD of total cost, regardless of the value of financing from the Bank), the project phase, and the type of financing. We require our clients to provide relevant documents to carry out a due diligence analysis, including in the area of human rights, for compliance with the ‘UN Guiding Principles on Business and Human Rights’. Then, as part of the environmental and social risk management process, we require our clients to inform the local community about the potential adverse impacts of the project and mitigation options, to make documentation available, to establish a mechanism for handling complaints, and to conduct a process of informed public consultation before construction begins. If material potential risks are identified, the clients manage them by implementing an Environmental & Social Action Plan (ESAP). This is prepared by an independent consultant in cooperation with the banks financing the project. For projects with a high potential risk, the Bank then requires monitoring reports, at contractually defined intervals, also prepared by an independent consultant, which are verified by the Bank. These issues are managed by the ESG risk unit, and its opinions are taken into account by decision-makers in the credit process. This process requires the Bank's involved units to collect relevant documentation and is subject to an internal control mechanism.

The process of assessing environmental and social risks at the level of the client is regulated by the Bank's internal procedures concerning clients of the Corporate and Investment Banking Division and clients of the Business and Corporate Banking Division who are subject to the ‘Social, Environmental and Climate Change Risk Management Policy’ or, in accordance with this Policy, conduct activities considered sensitive by the Bank. In the process concerning clients of the Corporate and Investment Banking Division, we take into account the impact of the client's activities on affected communities, among other things. We verify whether clients have appropriate policies, procedures or processes in place to prevent negative impacts on communities that result from the activities of the client or its suppliers. Through media monitoring, we also examine whether clients implement the provisions of their documents in practice. The environmental and social risk analysis process for clients of the Business and Corporate Banking Division is currently in the pilot phase and will be developed further in 2025.

In terms of reputational risk management, we monitor the activities of our business clients and the associated reputational risks for the Group. In accordance with the 'Reputational risk management policy' the process is carried out by the relevant units of the first and second line of defence, and is supervised by a member of the Bank's Management Board in charge of the Compliance Financial Crime and Prevention Division. For this purpose, we make use of, for instance, media monitoring. As part of it, we verify that the company or investment project is not controversial among the local community and take into account controversies related to respect of human rights or the social impact of the client or financed project in the decision-making process. Such cases are reviewed by the reputational risk unit. A negative opinion:

- may lead to the decision not to engage with the client,
- is taken into account in financing applications when a decision is made by the relevant body (e.g. credit committee), for new products or an existing commitment.

Remedies and termination of the customer relationship

In 2024, we have carried out activities that support the use of corrective measures. We introduced an internal procedure at the Bank for examining whether clients' investment projects comply with the Equator Principles. We have also broadened the scope of coverage of the 'Policy on financing sensitive sectors'. These actions complement internal processes, including those related to client monitoring and client remediation of potential damages. A detailed description can be found in the section S3-3 ‘Processes to remediate negative impacts and channels for affected communities to raise concerns’.

The termination of a business relationship through contract termination by the Bank is regulated by legal provisions, banking regulations, and the terms of agreements concluded with clients. If a client is found to have violated their obligations, particularly the provisions of the agreement, decisions on further actions are made appropriately, considering the nature and severity of the breach. These actions may include suspending the disbursement of subsequent financing tranches, increasing the margin, or terminating the contract. A client's negative impact on affected communities may constitute a violation of specific contractual obligations. An example includes agreements related to projects assessed under the Equator Principles methodology (details in section S3-3). Additionally, a client’s negative impact on the community may serve as a basis for ending the business relationship in ways other than termination, such as refusing to extend financing

Corporate social responsibility measures

Our own social activities are addressed primarily to the residents of Poland. We carry out initiatives mainly in the field of:

- **the development of entrepreneurship, professional competences and education.** They are mainly aimed at entrepreneurs, students and other young people. In this area, in 2024, we offered, among others, assistance in entering the labour market in the form of training and educational materials available on the Santander Open Academy platform, concerning foreign languages and professional competences,
- **financial education.** We provide this education mainly for children and young people (and their guardians), including through the ‘Finansiaki’ project, which has been developed over the past few years,
- **education in the field of cybersecurity.** It is aimed at clients and the general public. We conduct our activities via internet and mobile banking channels, on the Bank's website, as well as on social media (including the ‘Don't believe in fairy tales’ campaign),
- **increasing access to financial services.** These are aimed at people with insufficient banking services or otherwise financially excluded. We offer them appropriately designed financial services and service channels, including partner branches and ATMs in smaller towns, accounts for children under 13 and the ‘Cashless Poland’ programme,
- **social support through the activities of the Santander Foundation.** These are mainly aimed at people in difficult life situations or at risk of social exclusion, as well as at local communities. This group of activities covers areas such as education and youth activities, socio-economic development, social assistance, humanitarian aid and environmental issues. Examples of projects include employee volunteering, grant programmes (such as ‘ Here I Live, Here I Make ECO Changes’’ and ‘Together for ECO-Change’) and other charitable activities (such as ‘We Multiply Good – in 2024, the aim of the collection and donation was to support paediatric oncology wards, or the ‘Flame Club’, as part of which we renovate and equip rooms in children's hospitals).

Our social action agenda refers to the international Business for Societal Impact Standards. Those actions are oriented towards the UN Sustainable Development Goals. Mostly, they contribute to the goals: Good quality education (SDG 4) and Good health and quality of life (SDG 3). Other goals implemented include: Ending Poverty (SDG 1), Less Inequality (SDG 2), Economic Growth and Decent Work (SDG 8), Climate Action (SDG 13) and Partnerships for the Goals

(SDG 17). In 2024, we were preparing to implement a new model for social activities, according to which the Group will devote most of its resources to social goals related to education, improving professional skills and developing entrepreneurship.

We measure the effectiveness of social programs primarily by their reach, thus by the number of social support beneficiaries and people reached by the educational content. We also monitor the value of funds that the Group allocates to social purposes. These activities are supervised by the Head Director of the Communications and Brand Experience Department and the results of the implementation of the activities are reported to the ESG Committee on a quarterly basis.

Processes for engaging with affected communities about impacts (S3-2)

Communities that we affect through customers have limited options to contact us, like filing complaints, which is a result of banking secrecy, because banking law prohibits us to share information about our customers. As a general rule, communities are thus not aware of the business relationship between us and our customers who exert influence over these communities. When it comes to working with affected communities, we therefore focus on the requirements we set for our clients.

In the case of investment projects financed by the Bank, we oblige clients to consult with the local community and to share appropriate documentation available to the community in the local language and in a culturally appropriate way, revealing any potential adverse impacts of the project on the environment and community. Our clients consult with stakeholders and then incorporate the results of these consultations into their operations. The process takes place at an early stage of the project, before construction begins. For projects with a high potential risk of negative environmental or social impacts, we require the client to hire an independent, qualified consultant. Their task is to evaluate the public consultation process in terms of legal requirements, to ensure taking the results into account in the client's further operations.

When we manage reputational risk, we monitor whether our clients' actions are controversial, including community protests. Where this is the case, we check whether the client has fulfilled its public consultation obligations, whether it is implementing a policy or plan for communicating with stakeholders, and whether it is participating in meetings with local communities.

When defining the objectives of the Group's social agenda, we address the needs of the community. We analyse them on the basis of publicly available analyses of social challenges and needs in Poland. We also carry out surveys commissioned by the Bank when we design specific social initiatives. We work with NGOs to determine both the directions of action and the optimal way to spend the funds. The objectives of activities related to employee volunteering are defined in cooperation with employees.

In 2024, we conducted opinion surveys on:

- financial and economic education needs,
- customer needs related to financial health,
- priorities of potential donors regarding the social causes they would like to support.

Cooperation processes with the affected community are carried out by the relevant organisational units responsible for respective matters, including:

- units responsible for reviewing media content and information from NGOs as part of reputation risk management,
- units implementing the Bank’s ESG risk management policies in the context of ensuring that local communities are able to voice their opinions and concerns about the activities of the Bank’s business customers,
- units implementing and coordinating the Group’s social activities (including the Fundacja Santander, ESG and sponsorship teams),
- units carrying out (potential and current) customer research and marketing research, in the case of social activities linked to business objectives,
- Units coordinating membership and collaborating with sustainability organisations on behalf of the Bank.

The implementation of processes is supervised by the managers of these units, who are either a department heads director or a member of the Management Board.

Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)

In the context of corrective actions, we have not identified cases where the Group has a significant direct and negative impact on communities. Such a potential negative impact may occur in relation to the activities of our business customers. Due to the nature of our business relationship with them, we have limited influence on their activities, including remediation. Nevertheless, we monitor whether and how such actions are implemented.

With regard to the financing of investment projects within the Corporate and Investment Banking (CIB) Division, the application of the Equator Principles prevents the Bank from having a negative indirect impact. The clients minimise potential negative effects by implementing a plan (ESAP – Environmental & Social Action Plan). This is prepared by an independent consultant in cooperation with the project's financing banks. However, if such an impact cannot be avoided, we strive to ensure that clients minimise the impact on the community and implement the appropriate countermeasures, both in the social and environmental areas. Clients of the Corporate and Investment Banking Division whose projects are evaluated using the Equator Principles methodology are obliged by contractual provisions to inform us of negative environmental and social events related to the investment. The contract specifies sanctions or conditions for the disbursement of subsequent tranches of financing related to the client's compliance with the relevant standards (also specified in the contract). At the same time, we require these clients to have a grievance mechanism in place for the affected community for each investment project. The client is obliged to inform the community about this mechanism as part of the stakeholder engagement process.

In the process of assessing the client's environmental and social risks, we also verify that the client has put in place mitigation measures in the event of a negative impact and what their stance on the issue is. Such verification takes place in connection with the periodic review of clients of the Corporate and Investment Banking Division subject to the 'Social, environmental and climate change risk management policy'. Information about possible negative impacts and the corrective measures implemented by the client are taken into account when making a credit decision.

When managing reputational risk, we monitor whether the client carrying out controversial activities has offered compensation to affected communities and whether it is committed to community engagement. We conduct annual reviews, as well as ad hoc reviews if we identify a significant reputational factor on the client side. If we assess that the client's business requires corrective action, the compliance function commits the business unit to periodic reviews, the frequency of which depends on circumstances of the specific case. The business unit carries out media monitoring combined with direct dialogue with the client.

3.3.2 Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5)

Within the Group, we set strategic goals that allow us to monitor and manage the impact of our activities on communities. These goals relate to our direct influence and are subject to planning, approval, monitoring, and periodic review processes. The social responsibility strategy is developed, among other factors, based on stakeholder consultations, including representatives of civil society. In addition to strategic goals, we use operational metrics, which, as the strategy evolves, may be adapted to MDR-T requirements and classified as targets in the future.

Regarding community engagement efforts, the Bank has set a strategic goal (MDR-T) related to the number of beneficiaries of financial inclusion initiatives. This goal supports the Group's social impact strategy, which aims, among other things, to reduce financial exclusion, and is linked to the implementation of the "Responsible Banking and Sustainable Development Policy". It relates to increasing access to basic financial products and services, such as accounts, transactions, payments, and digital services, for unbanked individuals or those with insufficient access to banking services.

The goal is executed by ensuring access to a network of partner branches and ATMs in areas where the Bank does not have physical branches. These initiatives are carried out using an internal methodology, consistent across Banco Santander Group, based on international standards and verified by an independent external entity.

This target applies specifically to the Bank. The baseline year is 2023, when the goal was revised and incorporated into the Bank's new strategy. In 2023, the metric value was 145,849 beneficiaries. Within the 2024-2027 planning horizon (aligned with the Bank's strategic planning process), the target is to reach a total of 660,070 people

	2024 actual	2024-2027 plan
Number of beneficiaries of financial inclusion measures	201,573	660,070

The progress of the target is monitored on a quarterly basis as part of sustainability strategy progress reports, presented to the ESG Committee, the Management Board and the Supervisory Board. The level of ambition of the targets is reviewed in the annual planning processes, taking into account the trajectory of the Group's strategic objectives as well as plans and possibilities as to future activities.

Currently applied and monitored operational metrics (apply to the entire Group):

Name of operational metric	Metric
Support for society through educational programmes, addressing financial exclusion and social investment	▸ number of beneficiaries of financial education (and concerning cybersecurity). ▸ number of beneficiaries of social support. ▸ value of investments for community.
Building stakeholder trust through our social responsibility and stakeholder trust thro awareness	The image of a socially engaged bank. This NPS indicator reflects the perception of the Bank by current and potential customers compared to its direct competitors. It addresses the social responsibility dimension of the Bank's image.

Results of selected metrics in 2024:

- Number of beneficiaries of social support: 1.01 million.
- Number of beneficiaries of financial (and cyber-security) education: 744.6 thousand.
- Amount of social investment (in social support and financial education): PLN 10.61 million.

The number of social support beneficiaries includes Group support in the form of financial, material and employee volunteering. The number is based on the reach of individual initiatives, in line with accepted methodologies for reporting social metrics. We avoid double counting so that particular beneficiary benefiting from different activities under one initiative is only included once. In the absence of the tools to determine the exact number of beneficiaries of an initiative, we use an estimation method that involves subtracting 30% of people from the total reach of it.

We report on the beneficiaries of a social initiative after it has been completed, when the beneficiaries have already benefited from the support (which we provide to them directly or through social partners). We report on the amount of social investments at the beginning of a given project, when the Group's expenses are accounted for.

4. Governance information – Business conduct (G1)

4.1. Governance

Business conduct policies and corporate culture (G1-1)

Impacts and risks in business conduct

In the area of business activity and business conduct, according to the conducted double materiality analysis, topics such as corporate culture, whistleblower protection, supplier relationship management and anti-corruption are of key importance to us. The analysis identifies both significant impacts and risks that need to be managed appropriately in the Group.

- Impacts related to corporate culture include efforts to conduct business responsibly, taking into account the interests of employees, society and the environment. In the area of whistleblower protection, it is crucial to ensure confidentiality and effective channels for reporting violations, which fosters transparency and trust.
- Risks include supplier relationship management, where non-compliance with requirements such as operational resilience (e.g. DORA) can lead to business interruptions. In addition, risks exist in the area of corruption, where a lack of effective action can expose the organisation to reputational and financial losses.

The area of political influence and lobbying activities (G1-5) was not considered material in the double materiality analysis, as the Group is not engaged in activities that involve funding political parties, engaging in lobbying or undertaking other activities aimed at exercising political influence. Consequently, disclosures in this regard are not applicable to our business.

Business conduct policies (MDR-P)

Corporate governance in the Group defines the principles of the bodies and key systems and processes, shapes appropriate relations with the Bank's shareholders, customers and other stakeholders. The adopted principles build market confidence in the Group and indirectly support the sustainability and credibility of the domestic capital market. We place particular emphasis on the professionalism and ethical profile of the members of the management and supervisory bodies, as well as on transparency and utmost diligence in operations.

At Group Companies, corporate governance is based on applicable laws such as the 'Code of Commercial Companies' and the 'Banking Law', as well as supervisory guidelines, including the 'Corporate Governance Principles for Supervised Institutions' developed by the Polish Financial Supervision Authority (PFSA). In the case of the Bank, documents such as the 'Good Practices of Companies Listed on the WSE', 'Recommendation Z' on internal governance principles in banks issued by the PFSA and the 'Code of Banking Ethics' of the Polish Bank Association also play a key role. These standards and guidelines ensure consistency of operations, transparency and the highest quality of management within the Group.

A full description of the Bank's corporate governance is provided in Chapter XII ‘Statement on corporate governance in 2024’

As a Group, we have developed and implemented internal regulations that set out policies for business conduct. These policies are made available to employees via the Intranet, during the onboarding process via training and induction materials, and through an internal knowledge base. The Management Board and, in some cases, the Supervisory Board are usually responsible for their implementation. Among the key documents are:

Policy	Description of policy content	Scope of applicability of the policy and exclusions
‘Corporate Culture Policy of Santander Bank Polska Group	Defines the values, principles and standards of conduct that shape the way the Group and its employees operate. The Management Board and the Supervisory Board are responsible for the policy, ***Addressed IRO:*** *Acting in a responsible manner that takes into account not only the interests of investors and the Bank, but also the impact on employees, society and the environment, including the payment of taxes. Failure to fulfil the commitment to respect human rights due to the lack of adequate management structures, communication channels and scalability.*	Group (excluding Stellantis companies)
‘Respect and Dignity Policy’	Sets out principles for countering mobbing, harassment and discrimination and promoting fairness to ensure a safe and decent working environment for all employees and stakeholders. ***Addressed IRO:*** *Act responsibly and take into account not only the interests of investors and the Bank, but also the impact on employees, society and the environment, including paying taxes.*	Group (excluding Stellantis companies)

‘General Code of Conduct’	Defines ethical standards, compliance and accountability principles that apply to all employees, promoting integrity, transparency and the prevention of conflicts of interest in the Bank's operations. ***Addressed IRO:*** *Acting responsibly and taking into account not only the interests of investors and the Bank, but also the impact on employees, society and the environment, including paying taxes. Failure to fulfil the commitment to respect human rights due to lack of adequate management structures, communication channels and scalability.*	Group (Stellantis companies implemented a similar Code of Conduct for companies)
‘Conflict of interest Policy’	Describes the process for identifying and managing conflicts of interest, in particular with a view to meeting the requirements set out in legislation. ***Addressed IRO:*** *Failure to respect human rights due to lack of appropriate governance structures, communication channels and scalability. Risk arising from lack of appropriate governance structures, internal regulations and scalability to manage and resolve ESG issues.*	Group (Stellantis companies implemented their own regulations in this regard)
‘Anti-Bribery and Corruption Policy’ (ABC Policy)	Sets out rules and procedures to prevent unethical actions such as offering, accepting or demanding financial or personal benefits in exchange for abuse of position or function. The Management Board and Supervisory Board are responsible for the policy. ***Addressed IRO:*** *Combating all forms of corruption.*	Group (Stellantis companies implemented a similar Code of Conduct)
‘Whistleblowing Policy’	This policy, together with the ‘Internal Reporting Procedure (protection of whistleblowers)’, indicates the principles and procedures for safely reporting violations of laws, regulations or ethical standards within the organisation, considering the prohibition of retaliation. Amendments to both documents were implemented in December 2024 in connection with the opening of whistleblowing channels to customers and suppliers. ***Addressed IRO:*** *Protecting the confidentiality of whistleblower information through and effective communication system, in which the Bank provides the authorities with uniform information through solid, standardised rules and procedures in whistleblowing channels. Increase in the number of repeated incidents due to the failure to implement internal measures to effectively resolve incidents reported through complaint channels and the failure to implement continuous improvements.*	Group (Stellantis companies implemented their own regulations in this regard)
‘Supplier Cooperation and Outsourcing Policy’	Sets out principles for supplier selection, assessment and monitoring, risk management and regulatory compliance. ***Addressed IRO:*** *The Policy addresses supplier relationship management issues, including payment practices and the risk arising from the non-implementation of operational resilience solutions related, for example, to DORA (Digital Operational Resilience Act) requirements for the entire value chain.*	Group (excluding Santander Factoring, Stellantis companies implemented their own regulations in this regard)
‘Information Policy’	Scope and disclosure principles	Group (excluding Santander Factoring and Stellantis companies, Santander Leasing implemented its own regulations in this regard)
‘Purchasing Policy’ of Santander Bank Polska S.A.	Processing and verification of purchase requests, rules for the selection of suppliers. ***Addressed IRO:*** *The Policy addresses supplier relationship management issues, including payment practices.*	Group (excluding Santander Factoring and Santander Consumer Financial Solutions, Stellantis companies implemented their own regulations in this regard)

Business Conduct Actions (MDR-A)

The Bank implements a number of actions that stem from the policies described above and serve to prevent negative influences, contribute to positive ones, minimize risks and take advantage of opportunities in the area of business conduct. They are continuous in nature, which means that they will be continued and developed in future years. The following subsections detail the initiatives and actions taken in 2024 in areas such as organizational culture, protection of whistleblowers, managing practices with suppliers, and combating all forms of corruption.

Our corporate culture

In the Group, we adhere to the idea of the ‘Santander Way’ which defines the purpose and ways in which we operate. Our three corporate values – Simple, Personal, Fair – describe how we approach customers to whom we offer financial services, and employees working in Group companies.

The day-to-day operation of the Group is supported by a set of desirable corporate behaviours. Their acronym 'T.E.A.M.S' defines our priorities.

As a Group, we act ethically, following the values and principles written down in our key document, the publicly available 'General Code of Conduct', applicable to all companies. We defined in the Code detailed principles of ethical work in our organisation, present examples of behaviour desirable in specific situations and clearly communicate the consequences of violating ethical standards. The Code's standards are addressed to all employees of the Bank under an employment contract or those who cooperate with us under civil law contracts, including top management and members of the Bank's management and supervisory bodies. The organisational culture assessment process is carried out in accordance with the 'Corporate Culture Policy of Santander Bank Polska Group'. The assessment includes an analysis of how values are perceived among key stakeholders, in the Your Voice survey and customer satisfaction.

Selected aspects addressed by the provisions of the Code

1. **Corporate culture - 'Santander Way' and T.E.A.M.S. motto**
2. **Equal opportunities and non-discrimination**
3. **Inclusive and respectful work environment**
4. **Counteracting conflicts of interest**
5. **Processing confidential information and personal data**
6. **Rules of conduct in the media and during public appearances**
7. **Procedures to be followed in the securities markets**
8. **Maintaining fair and responsible relations with competitors**
9. **Cybersecurity**
10. **Responsible use of social media**
11. **Credibility and transparency of financial information**
12. **Control of staff expenditure**
13. **Respect for intellectual and industrial property rights**
14. **Selling banking products and services**
15. **Contacts with suppliers and intermediaries**
16. **Gifts and invitations from third parties**
17. **Countering financial crime**
18. **Cooperation with public authorities**

All employees are required to read and comply with the Code of Conduct. The principles described in the document are presented during onboarding training. They are also recalled periodically during mandatory training courses, such as the Bank's training in the 'General Code of Conduct'. Anti-corruption programme and prevention of the risk of criminal liability'. The Code is reviewed annually and was updated in 2024 in connection with the recommendation of the PFSA, regulatory changes and the amendment of the Labour Code, taking into account, among other things, issues of compliance with social and environmental regulations and an update of the breach reporting rules.

The Group's corporate culture in 2024 was also defined by:

- 'Responsible Banking and Sustainability Policy',
- 'Corporate Culture Policy of Santander Bank Polska Group',
- three corporate values – Simple, Personal, Fair,
- behaviours in line with T.E.A.M.S.

Mechanisms for identifying, reporting and investigating violations

At the Group we have implemented a whistleblowing system that ensures that internal and external stakeholders can report violations and irregularities through dedicated communication channels. This system is an integral part of our corporate culture, supporting adherence to the ethical standards and principles of social and business responsibility.

- Employees can report issues relating to, among other things, violations of the law, internal procedures or ethical standards in accordance with the 'Whistleblowing Policy'. Reports can be made both anonymously and openly using the KLAKSON application, the helpline, email addresses and traditional mail. Details of this process are described in the 'Our employees' section. In addition, based on the provisions of the 'Internal reporting procedure (whistleblower protection)', both employees and other persons who are bound to the Bank by their employment context can report violations of the law as defined in the Whistleblower Protection Act, via email address, traditional mail or during a meeting.
- Reports are handled in accordance with the "Whistleblowing Policy" and the "Internal Reporting Procedure (Whistleblower Protection)," the provisions of which set forth principles for preventing conflicts of interest at the stage of clarifying reported cases, maintaining confidentiality and anonymity, non-retaliation, and regular audits of the functioning of the whistleblowing model.
- Individual customers can report complaints, remarks and problems in accordance with the 'Consumer Protection Policy': online (via the e-banking system or mobile app, as well as using the online form), by phone, in person at any branch or partner branch and by letter. Deaf people can also use the option of video chat with the help of a sign language interpreter. For more on this, please see the 'Our customers' section.
- Other stakeholders can use the dedicated email address, make comments and suggestions by letter or phone, or in person at any branch or partner facility. For more on this topic, see the section 'Affected communities'.

[Own indicator: Number of reports of irregularities and/or issues for clarification to the, ‚ethics mailbox' and helpline]

> In 2024, we received 165 reports via whistleblowing channels (including ethics and "whistleblower" mailboxes, by letter, through the app, and a helpline)

At the Bank, as authorised by the Bank's Management Board, the Chief Compliance Officer is responsible for the operation of the whistleblowing procedures, and designated employees of the compliance function are authorised to receive and follow up on reports, as well as perform quarterly reporting of the results of investigations carried out to the Management Board.

The member of the Management Board who manages the Compliance and Anti-Financial Crime Division shall provide updates to the President of the Management Board and the Supervisory Board at least once every six months of material reports from whistleblowing channels. Material reports are understood to include, among other things matters:

- concerning specific individuals in the Bank,
- concerning persistent, repeated or major irregularities in the application of procedures or in the execution of processes,
- which may pose a risk of criminal, civil or administrative liability of the Bank or expose the Bank to regulatory sanctions,
- which contain information causing a high reputational risk for the Bank, the Group or the Banco Santander Group.

The Supervisory Board assesses the adequacy and effectiveness of the procedures as required, but at least once a year.

The whistleblowing system in Group companies also operates in accordance with the 'Whistleblowing Policy' The companies have adapted this system to the specific nature of their business and structure. They provide a variety of channels, such as applications, dedicated mailboxes, helplines or traditional mail. All Group companies provide the opportunity to report violations anonymously and openly, they also apply measures to protect whistleblowers from retaliation, maintain registers of reports, and communicate the results of investigations to management or supervisory bodies.

> In 2024, educational efforts were continued to prepare employees to report workplace violations and preventive measures such as:
> - A communication campaign, promoting ethical attitudes, a 'Speak Up' culture and how to report violations and irregularities,
> - Educational activities by the Office of Ethics and Relationships for managers including meetings, articles and educational materials, aimed at sharing lessons learned from employee relations reports.
> - A series of articles and webinars on labour relations violations for employees,
> - Meetings held by the Director of the Ethics and Relations Office with members of the Management Board to discuss the conclusions and recommendations developed based on staff reports on workplace relations

Management of relationships with suppliers (G1-2) and payment practices (G1-6)

Supplier relations

In accordance with the Group's 'Responsible Banking and Sustainability Policy', we take care that ESG obligations are respected throughout the supply chain. The management of supplier relations is based on the 'Purchasing Policy', the 'Supplier Cooperation and Outsourcing Policy' and numerous procedures related to supplier management. The purchasing process involves a CSR survey, which bidders participating in tender procedures are required to complete, and the results form part of the merit evaluation. In 2024, we have introduced a comprehensive supplier ESG risk assessment system at the Bank – a step towards a more complete integration of environmental, social and corporate governance criteria in supplier relationship management. Additionally, in 2024, we developed an ESG Code for Suppliers to replace the CSR survey and establish minimum standards in the areas of environmental, social, and governance practices that we expect our partners to meet. Its formal adoption is planned for Q1 2025. In other Group companies, procurement and contract management procedures include elements of social responsibility, but we are implementing the above-mentioned measures exclusively at the Bank for now.

The most important regulations related to the supply chain management of Group companies are as follows:

	Santander Bank Polska S.A.	Santander Leasing S.A.	Santander Factoring Sp. z o. o.	Santander Consumer Bank S.A.	Santander TFI S.A.
'Purchasing Policy' of Santander Bank Polska	+	+		Purchasing and supplier management procedure	+
'Supplier Selection Procedure' of Santander Bank Polska	+		+		+
'Policy on cooperation with suppliers and outsourcing' of Santander Bank Polska	+			Outsourcing and supplier management model	+
'Responsible Banking and Sustainability Policy'	+	+	+	+	+
'Supplier management and outsourcing procedure' at Santander Bank Polska	+	+	+		+

* *Santander Leasing has regulations modelled on the Bank's documents – these include a supplier management procedure, a supplier cooperation policy and a purchasing procedure.*

We consider compliance with the principles of fair and equitable treatment, transparency and integrity in our dealings with suppliers. We expect our suppliers to implement policies on ethics and legal compliance, anti-corruption mechanisms and initiatives to ensure business integrity, health and safety standards, workplace diversity and inclusivity, as well as compliance with the UN Universal Declaration of Human Rights and the 10 principles of the UN Global Compact.

When qualifying suppliers for cooperation, the Bank verifies, among other things:

- whether they diversify their revenue streams and do not become dependent on the Bank,
- whether they have relevant certifications, e.g. on environmental protection and labour relations,
- whether they apply ESG principles, have codes of ethics, implement anti-corruption proceedings and programmes and publish reports,
- whether they operate ethically in financial matters, including paying employee contributions, taxes, and obligations to counterparties.

Ultimately, we want all Group Companies to include social and environmental criteria in the supplier selection processes they carry out directly for their operations. In 2024, some of the Group Companies undertook such assessments.

> Group companies incorporating sustainability criteria in their contractor selection procedure

	Santander Bank Polska S.A.	Santander Consumer Bank S.A.	Santander Leasing S.A.	Santander Factoring Sp. z o. o.	Santander TFI S.A.	Stellantis
Social criteria	+	+	–	–	–	–
Environmental criteria	+	+	–	–	–	–

Payment practices

In the Group, we do not have a formal, separate policy for preventing delays in payments to suppliers. Neither do we use standard payment terms – payments to suppliers are made on the basis of contractual or statutory arrangements. Instead, we have implemented procedures and regulations for the circulation and processing of accounting documents, as well as payment procedures to minimise the risk of delays. Electronic document workflow systems are in place throughout the Group to support the fast and efficient processing of invoices and other accounting documents.

> Key indicators reflecting payment practices in 2024:

	31.12.2024
Average time to pay the invoice (days)[10]	10.17
Percentage of payments made in accordance with agreed payment deadlines[11]	96.38%
Number of court cases concerning late payments	1

There are no supplier categories in the Group, so we report the indicators on payment practices together for all suppliers.

In 2024, we completed the implementation of the changes resulting from the DORA (Digital Operational Resilience Act) Regulation, the EU regulation on digital resilience of financial institutions. Throughout the implementation cycle, the project was monitored by Management Board Members within the Steering Committees and also within the banking compliance committee. The following units were involved in the project in the substantive and GAP analysis: Legal Area, Technology Risk Area, Supplier Control Team, CIO, CISO. Prior to the entry into force of the Regulation, we underwent an audit carried out by an independent audit firm on the Bank's compliance with the Regulation. We actively participate and have participated both in the cooperation with the Banco Santander Group and within the DORA project teams at the Polish Bank Association.

Prevention and detection of corruption and bribery (G1-3)

Conflicts of interest

The Group's conflict of interest policies are based on the regulations implemented in the Bank as the parent company. 'Conflict of Interest Policy at Santander Bank Polska S.A.' clarifies the provisions of the 'General Code of Conduct', imposing on all employees the obligation to prioritise the interests of the Group, customers and other stakeholders, which they may under no circumstances subordinate to their private interest.

According to the Code, employees and company management are bound by, among other things:

- no special treatment or offer of special terms and conditions of employment on the basis of personal or family ties,
- no additional benefit from a position held in the Group, except where expressly permitted,
- no participation in approving transactions or influencing transactions with economically or familial related persons acting as beneficiaries or guarantors.

The 'Conflict of interest policy at Santander Bank Polska S.A.' governs situations of conflict of interest, including:

- between customers,
- between the Bank and its customers,
- arising from the relationship between a Group company and the Bank acting as its parent,
- between Group companies and members of their governing bodies,
- with significant shareholders of Group companies,
- between the Bank and its suppliers, third parties or major business partners,
- between lines and/or business units of the Bank,
- between business two Group Companies,
- between members of the Bank's Supervisory Board or Management Board or between members of these bodies and other employees (arising, among other things, as a result of non-service relationships arising from kinship or affinity),
- between the Bank and related parties other than those listed above.

[10] *Data on the average time taken to pay invoices in the Group has been calculated according to a methodology in which, at Group Company level, the arithmetic average of the number of days taken to pay invoices in the reporting period is taken. At Group level, a weighted average is used, where the weight is the number of invoices paid by each entity. With this method, the indicator takes into account the diversity of suppliers and provides a representative picture of payment practices.*

[11] *Percentage indicator re. what proportion of invoices have been paid within the deadlines according to commercial agreements or arrangements with suppliers.*

In the Bank, potential conflicts of interest are assessed by experts from the Compliance and Anti-Financial Crime Division. They have the right to request certain data or information about personal or professional conditions that may affect the performance of employees' duties and their decisions.

Members of the Bank's Management and Supervisory Boards prevent conflicts of interest primarily by avoiding professional activities that may lead to their occurrence. They are also not permitted to take part in the resolution of matters where a conflict of interest involving them has arisen or may arise. They are furthermore obliged to inform the Bank of such situations. The issues of possible conflicts of interest concerning members of the Management Board and the Supervisory Board are examined prior to their appointment to these bodies and as part of regular secondary suitability assessments.

In accordance with generally applicable laws, the Bank discloses in its periodic financial statements to stakeholders:

- memberships on boards of directors/supervisory boards of other organisations,
- ownership of shares in supplier companies and other stakeholders,
- existence of controlling shareholders in the company,
- related parties, their relationships and transactions, as well as outstanding receivables.

Information on the assessment of the suitability of the members of the Bank's Management Board and Supervisory Board is submitted to the PFSA. In line with the Bank's suitability policies for members of its governing bodies, a reassessment of the time commitment required from a member of the Management Board or Supervisory Board is conducted if they assume an additional directorship or undertake other significant activities, including political engagements. The suitability assessment of Supervisory Board members is carried out by the General Meeting and the documents are published on the website.

In addition, the Bank complies with its legal obligation to disclose information about major shareholdings in accordance with the Public Offering Act. Issues of disclosure of conflicts of interest are also included in the 'Regulations for investment by or for the account of Obligated Persons in Financial Instruments at Santander Bank Polska SA'. It requires those discharging managerial responsibilities and those closely associated with them to provide the Polish Financial Supervision Authority and the Bank with information on any transaction concluded for their account with respect to the Bank's shares, the Bank's debt instruments, derivatives or other related financial instruments.

This policy is binding in the Bank and serves as a reference document to be followed by other entities within the Group in activities related to the matters it addresses. Group companies are required to use this document as the foundation for all related policies, procedures and regulations that they develop and implement in the field in question, while making any required changes to bring its provisions into line with local policies, recommendations and orders issued by supervisory authorities.

Counteracting corruption

Corruption prevention issues are described in the 'General Code of Conduct' in force across the Group. It is supplemented by the 'Anti-Bribery and Corruption Policy (ABC)', which clarifies, among other things, training requirements in this area. All Group companies operate according to the 'zero tolerance for corruption' principle, and the implemented regulations concern, among other things:

- offering gifts and invitations to public officials,
- gifts and invitations handed to employees,
- relations with third parties,
- implementation of additional control mechanisms,
- channels for reporting violations of the rules.

Another element of the anti-corruption and anti-bribery system in the Bank and in Santander Consumer Bank is a set of specific rules clarifying the conditions for accepting and offering gifts and invitations in relations with those outside the Bank, which are described within the 'Guidelines for gifts and invitations'. This regulation specifies which types of gifts and invitations cannot be given or accepted, as well as what the rules of conduct are for permitted cases, including but not limited to:

- conditions (adapted to the type and value of the gift or invitation) of the acceptance process for the acceptance or presentation of a gift/invitation are defined, applicable to all Bank employees,
- all gifts and invitations accepted or given by Bank employees are subject to entry in the gifts and invitations register,
- on a quarterly basis, we monitor the register according to the principles set out in the Guidelines and record the results,
- in the event of the identification of a case that may have the appearance of corruption, the matter is referred to the unit responsible for counteracting corruption.

Investigation of potential corruption or bribery cases

Within the Group, the committees of inquiry investigating corruption or bribery cases are independent of the management structures responsible for the prevention and detection of these cases. This operating model ensures the objectivity and transparency of the investigations. The composition of the committees is selected in each case in a way that eliminates potential conflicts of interest, which allows for a fair and impartial analysis of reported cases. The committee's work is conducted in accordance with the guidelines contained in the 'Anti-Bribery and Corruption Policy (ABC Policy)' and other internal Group regulations. Thus, we ensure that each report of corruption or bribery is dealt with in a fair manner, respecting the principles of confidentiality and professionalism, and that recommended corrective actions are implemented in accordance with accepted standards.

In the Bank, information on the number of reports categorised as corruption or bribery received through whistleblowing channels is reported to the Management Board and the Audit and Compliance Management Committee on a quarterly basis. In addition, these bodies receive an annual report that summarises the operation of the employee whistleblowing procedures. On this base, the Management Board assesses the adequacy and effectiveness of these procedures.

Anti-corruption training

Training on anti-bribery and corruption is mandatory for all our employees (including members of the Management Board and Supervisory Board). Training courses are held online, usually once a year, except for Santander Consumer Bank, where they are renewed every 2 years. Their scope includes local regulations, ethical rules, anti-corruption policies, gifts, conflicts of interest, the corporate defence model and case studies. Companies also provide additional training during onboarding or make materials available when regulations change. Data on training completion is systematically collected and monitored.

> Results of the Group's anti-corruption and ethics-related training programmes in 2024

	% of employees who received anti-corruption training in 2024
Group's top management – one level below the Management Board *	91.4%
Group's top management – two levels below the Management Board *	90.1%
Other Group employees **	91.2%
Group Total	91.2%

* *Top management: Defined as one or two levels below the management and supervisory bodies, which in the Group are the Management Board and the Supervisory Board. This includes senior executives and managers in the Bank, as well as members of the Boards of Directors of Group companies and individuals reporting directly to these Boards.*
** *Employees with long-term absences were not included.*

4.2. Measures and targets

Business conduct targets (MDR-T)

As of 31 December 2024, we have not set measurable, time-bound and results-oriented strategic targets in the Group that comply with MDR-T requirements for business conduct. Nonetheless, the effectiveness of our policies and activities is monitored through operational metrics such as:

- effective implementation of the Group Culture Policy through the average score of the engagement survey and eNPS.
- effective implementation of the Whistleblowing Policy (whistleblowing) and Internal Reporting Procedure (whistleblower protection) through the average number of reports per 1,000 employees per quarter (for more details, see subsection S1-5 'Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities').

Incidents of corruption or bribery (G1-4)

In the period from 1 January to 31 December 2024, there were three confirmed cases of corruption and bribery in the Group – as a result of those incidents, disciplinary measures were taken, and reports of suspected offences were filed against the employees. The detected incidents indicate that the procedures in force in the Group are effective in identifying and eliminating irregularities. We have not identified any gaps in the existing procedures, but we plan to continue monitoring their effectiveness and verifying the scope of training in counteracting corruption and bribery.

We have no information that, during the reporting period, any final convictions were handed down in connection with cases of corruption and bribery. Likewise, there were no penalties imposed on the Group for violations of anti-corruption and bribery laws. There were also no cases involving contracts with business partners that were terminated or not renewed due to breaches related to corruption or bribery.

5. Additional information

ESRS disclosure requirements covered by the entity's sustainability statement (IRO-2)

> ESRS table

Index code	Name	Place in report section
ESRS 2	General disclosure	General Disclosures (Sustainability of the Group)
BP-1	Basis for preparation of sustainability statement	General basis for preparation of the sustainability statement (BP-1)
BP-2	Disclosure in relation to special circumstances	Disclosures in relation to specific circumstances (BP-2)
GOV-1	The role of the administrative, management and supervisory bodies	The Role of the Management Board and the Supervisory Board (GOV-1)
GOV-2	Information provided to the entity's administrative, management and supervisory bodies and the sustainability issues they undertake	Information provided to and sustainability matters addressed by the Management Board and the Supervisory Board (GOV-2)
GOV-3	Including sustainability-related outcomes in incentive systems	Integration of sustainability-related performance in incentive schemes (GOV-3)
GOV-4	Due diligence statement	Statement on due diligence (GOV-4)
GOV-5	Risk management and internal controls over sustainability reporting	Risk management and internal controls over sustainability reporting (GOV-5)
SBM-1	Strategy, business model and value chain	Strategy, business model and value chain (SBM-1
SBM-2	Stakeholder interests and opinions	Interests and views of stakeholders (SBM-2)
SBM-3	Significant impacts, risks and opportunities and their interrelationship with the strategy and the business model	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)
IRO-1	Description of processes to identify the assessment of significant impacts, significant risks and significant opportunities	Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)
IRO-2	ESRS disclosure requirements covered by the entity's sustainability statement	ESRS disclosure requirements covered by the entity's sustainability statement (IRO-2)
ESRS E1	Climate change	Environmental information – climate change (ESRS E1)
ESRS 2 GOV-3	Including sustainability-related outcomes in incentive schemes	Integration of sustainability-related performance in incentive schemes (GOV-3)
E1-1	Transformation plan for climate change mitigation	Transition plan for climate change mitigation (E1-1)
ESRS 2 SBM-3	Significant impacts, risks and opportunities and their interrelationship with the strategy and the business model	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)
ESRS 2 IRO-1	Description of processes for identifying and assessing climate-related significant impacts, risks and opportunities	Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)
E1-2	Policies related to climate change mitigation and adaptation	Policies related to climate change mitigation and adaptation (E1-2)
E1-3	Action and resources in relation to climate policy	Actions and resources in relation to climate change policies (E1-3)
E1-4	Climate change mitigation and adaptation objectives	Targets related to climate change mitigation and adaptation (E1-4)
E1-5	Energy consumption and energy mix	Energy consumption and energy mix (E1-5)
E1-6	Gross Scope 1, 2 and 3 greenhouse gas emissions and total greenhouse gas emissions	Gross Scope 1, 2 and 3 greenhouse gas emissions and total greenhouse gas emissions (E1-6)
E1-7	GHG removal and reduction projects using carbon credits	Other climate-related disclosures (E1-7, E1-8, E1-9)

E1-8	Internal determination of greenhouse gas emission charges	Other climate-related disclosures (E1-7, E1-8, E1-9) Disclosure does not apply to the Group
E1-9	Anticipated financial impacts from significant physical and transition risks and potential climate-related opportunities	Other climate-related disclosures (E1-7, E1-8, E1-9) Phase-in
ESRS S1	Own workforce	Our People – own workforce (ESRS S1)
ESRS 2 SBM-2	Stakeholder interests and opinions	Interests and views of stakeholders (SBM-2)
ESRS 2 SBM-3	Significant impacts, risks and opportunities and their interrelationship with the strategy and the business model	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)
S1-1	Policies related to own workforce	Policies related to own workforce (S1-1)
S1-2	Procedures for working with your own employees and employee representatives to influence	Involvement of employees and procedures for working with employees' representatives (S1-2)
S1-3	Mitigation processes and channels for reporting problems by unit staff	Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3)
S1-4	Taking action on significant impacts on its own workforce and using approaches to mitigate significant risks and exploit significant opportunities associated with its own workforce, and the effectiveness of these actions	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4) (MDR-A)
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)
S1-6	Characteristics of the Undertaking's Employees	Characteristics of employees (S1- 6)
S1-7	Characteristics of non-employees in the undertaking's own workforce	Characteristics of non-employees in the Group's own workforce (S1-7)
S1-8	Collective bargaining coverage and social dialogue	Collective bargaining coverage and social dialogue (S1-8)
S1-9	Diversity metrics	Diversity metrics (S1-9)
S1-10	Adequate wages	Adequate wages (S1-10)
S1-11	Social protection	Social protection (S1-11)
S1-12	Persons with disabilities	Persons with disabilities (S1-12)
S1-13	Training and skills development indicators	Training and Skills Development metrics (S1-13)
S1-14	Health and safety metrics	Health and safety metrics (S1-14)
S1-15	Work-life balance	Work-life balance metrics (S1-15)
S1-16	Remuneration metrics (pay gap and total remuneration)	Remuneration metrics (pay gap and total remuneration) (S1-16)
S1-17	Incidents, complaints and serious human rights impacts	Incidents, complaints and severe human rights impacts (S1-17)
ESRS S3	Affected communities	Affected communities (ESRS S3)
ESRS 2 SBM-2	Stakeholder interests and opinions	Interests and views of stakeholders (SBM-2)
ESRS 2 SBM-3	Significant impacts, risks and opportunities and their interrelationship with the strategy and the business model	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)
S3-1	Policies related to affected communities	Policies related to affected communities (S3-1)
S3-2	Processes for engaging with affected communities about impacts	Processes for engaging with affected communities about impacts (S3-2)
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)

S3-4	Taking action on material impacts on affected communities, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions (S3-4) (MDR-A)
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5)
ESRS S4	Consumers and end-users	Our customers – consumers and end-users (ESRS S4)
ESRS 2 SBM-2	Stakeholder interests and opinions	Interests and views of stakeholders (SBM-2)
ESRS 2 SBM-3	Significant impacts, risks and opportunities and their interrelationship with the strategy and the business model	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)
S4-1	Policies related to consumers and end-users	Policies related to consumers and end-users (S4-1)
S4-2	Processes for engaging with consumers and end-users about impact	Processes for engaging with consumers and end-users about impacts (S4-2)
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)
S4-4	Taking action on significant impacts on consumers and end-users and applying approaches to manage significant risks and opportunities related to consumers and end-users, and the effectiveness of these actions	Taking action on material impacts on consumers and end- users,, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users and effectiveness of those actions (S4-4) (MDR-A)
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)
ESRS G1	Business Conduct	Governance information – Business conduct (G1)
ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	The Role of the Management Board and the Supervisory Board (GOV-1)
ESRS 2 IRO-1	Description of processes to identify and assess significant impacts, risks and opportunities	Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)
G1-1	Business conduct policies and corporate culture	Business conduct policies and corporate culture (G1-1)
G1-2	Management of relationships with suppliers	Management of relationships with suppliers (G1-2) and payment practices (G1-6)
G1-3	Prevention and detection of corruption and bribery	Prevention and detection of corruption and bribery (G1-3)
G1-4	Incidents of corruption or bribery	Incidents of corruption or bribery (G1-4)
G1-5	Political influence and lobbying activities	Disclosure does not apply to the Group
G1-6	Payment practices	Management of relationships with suppliers (G1-2) and payment practices (G1-6)

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU)2020/1816, Annex II	
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1			
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to Controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2	
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	

ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1			
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1			
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1			
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk.		
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy- efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Paragraph 34;Template 2:Banking book -Climate Change transition risk: Loans collateralised by immovable		

		property – Energy efficiency of the collateral		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1			
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1			
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1			
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1			
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1			
ESRS 2- IRO 1 – E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1			
ESRS 2- IRO 1 – E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1			
ESRS 2- IRO 1 – E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1			
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1			
ESRS E4-2 Sustainable oceans / seas practices or Policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1			

ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1			
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1			
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1			
ESRS 2- SBM3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I			
ESRS 2- SBM3 – S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I			
ESRS S1-1 Human rights policy Commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I			
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I			
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I			
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I			
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-14	Indicator number 3 Table #3 of Annex I			

Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)		
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I	
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I	
ESRS S1-17 Nonrespect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I	
ESRS S2-1 Human rights policy Commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1	
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1	
ESRS S2-1 Nonrespect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19		Delegated Regulation (EU) 2020/1816,Annex II
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1	

ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1		
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art. 12 (1)	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1		
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1		
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art. 12 (1)	
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1		
ESRS G1-1 United Nations Convention against corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1		
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1		
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS G1-4 Standards of anticorruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1		