



**Capital Adequacy and Other Information Subject to Disclosure
of the Alior Bank Spółka Akcyjna Capital Group
as at 31 December 2025**

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Introduction

Alior Bank Spółka Akcyjna with its registered office in Warsaw (hereinafter referred to as the "Bank") is obliged, under Part Eight of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, as amended (hereinafter referred to as the "CRR Regulation") and the Banking Law Act of 29 August 1997, as amended (hereinafter referred to as the "Banking Law"), to publish quantitative and qualitative information within the scope of Pillar III in a generally accessible manner, excluding insignificant, proprietary or confidential information.

The information is published in accordance with Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosure by institutions of information referred to in Titles II and III of Part Eight of that Regulation and repealing Commission Implementing Regulation (EU) 2021/637, as amended (hereinafter "Regulation 2024/3172"), and is also published in accordance with Guidelines EBA/GL/2020/12 amending Guidelines EBA/GL/2018/01 and Guidelines EBA/GL/2021/04, EBA/GL/2022/08 and EBA/GL/2022/06 on remuneration policy, as well as supplemented with the provisions resulting from Recommendations M, P, R and Z of the Polish Financial Supervision Authority.

The report is an implementation of the adopted "Information Policy regarding capital adequacy and other information to be published at Alior Bank S.A." (hereinafter "Information Policy"). The information policy was implemented by a resolution of the Bank's Management Board and approved by the Bank's Supervisory Board, and is published on the Bank's website.

The presented scope of information is consistent with the requirements of Art. 433 and 433c of the CRR Regulation. Taking into account the scale of its operations, the bank does not meet the conditions described in Art. 4 points 145 and 146 of the CRR Regulation.

The published scope of information is intended to provide market participants with a comprehensive picture of the risk profile of Alior Bank SA and the Alior Bank SA Capital Group.

As at December 31, 2025, the Alior Bank SA Capital Group consists of: Alior Bank SA, as the parent company, and subsidiaries in which the Bank holds majority shares. For the purposes of calculations in the area of capital adequacy, prudential consolidation was used - in accordance with Article 19 of the CRR Regulation - therefore, the consolidation included Alior Bank SA and Alior Leasing Sp. z o. o.

Unless otherwise stated, the information disclosed in this document is based on data from the consolidated financial statements of the Alior Bank S.A. Capital Group for the year ended December 31, 2025. The risk profile of the Bank's Capital Group is primarily influenced by Alior Bank S.A., therefore, some of the information contained in the report relates to individual data of Alior Bank S.A.

Figures are drawn up in Polish zlotys (PLN) and are rounded up to one million zlotys (M).

This version of our report is a translation from the original, which was prepared in Polish language. All possible care has been taken to ensure that the translation is an accurate representation of the original. However, in all matters of interpretation of information, views or opinions, the original language version of our report takes precedence over this translation.

EU OV1 – Overview of total risk exposure amounts

PLN m

			Total risk exposure amounts (TREA)		Total own funds requirements
			31.12.2025	31.12.2024	31.12.2025
			a	b	c
			0010	0020	0030
1	Credit risk (excluding CCR)	0010	52 603	45 451	4 208
2	Of which the standardised approach	0020	52 603	45 451	4 208
3	Of which the Foundation IRB (F-IRB) approach	0030			
4	Of which slotting approach	0040			
EU-4a	Of which equities under the simple risk weighted approach	0050			
5	Of which the Advanced IRB (A-IRB) approach	0060			
6	Counterparty credit risk – CCR	0070	810	627	65
7	Of which the standardised approach	0080	237	142	19
8	Of which internal model method (IMM)	0090			
EU-8a	Of which exposures to a CCP	0100	567	483	45
9	Of which other CCR	0110	6	2	
10	Credit valuation adjustments risk - CVA risk	0120	30	21	2
EU-10a	Of which the standardised approach (SA)	0130			
EU 10b	Of which the basic approach (F-BA and R-BA)	0140	30	21	2
EU 10c	Of which the simplified approach	0150			
11	not applicable	0160			
12	not applicable	0170			
13	not applicable	0180			
14	not applicable	0190			
15	Settlement risk	0200			
16	Securitisation exposures in the non-trading book (after the cap)	0210			
17	Of which SEC-IRBA approach	0220			
18	Of which SEC-ERBA (including IAA)	0230			
19	Of which SEC-SA approach	0240			
EU-19a	Of which 1250% / deduction	0250			
20	Position, foreign exchange and commodities risks (Market risk)	0260	357	217	29
21	Of which the Alternative standardised approach (A-SA)	0270			
EU 21a	Of which the Simplified standardised approach (S-SA)	0280	357	217	29
22	Of which Alternative Internal Model Approach (A-IMA)	0290			
EU-22a	Large exposures	0300			
23	Reclassifications between the trading and non-trading books	0310			
24	Operational risk	0320	5 843	4 895	467
EU 24a	Exposures to crypto-assets	0330			
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	0340			
26	Output floor applied (%)	0350			
27	Floor adjustment (before application of transitional cap)	0360			
28	Floor adjustment (after application of transitional cap)	0370			
29	Total	0380	59 643	51 211	4 772

EU KM1 – Key metrics template

PLN m

			31.12.2025	30.06.2025*	31.12.2024**
			a.	c.	e.
			0010	0030	0050
	Available own funds (amounts)	0005			
1	Common Equity Tier 1 (CET1) capital	0010	10 515	10 499	9 742
2	Tier 1 capital	0020	10 515	10 499	9 742
3	Total capital	0030	10 515	10 499	9 742
	Risk-weighted exposure amounts	0035			
4	Total risk exposure amount	0040	59 643	57 961	51 211
4a	Total risk exposure pre-floor	0041	59 643	57 961	
	Capital ratios (as a percentage of risk-weighted exposure amount)	0045			
5	Common Equity Tier 1 ratio (%)	0050	17.63%	18.11%	19.02%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	0051			
6	Tier 1 ratio (%)	0060	17.63%	18.11%	19.02%
6b	Common Equity Tier 1 ratio considering unfloored TREA (%)	0061			
7	Total capital ratio (%)	0070	17.63%	18.11%	19.02%
7b	Total capital ratio considering unfloored TREA (%)	0081			
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)	0075			
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	0080			
EU 7e	of which: to be made up of CET1 capital (percentage points)	0090			
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	0100			
EU 7g	Total SREP own funds requirements (%)	0110	8.00%	8.00%	8.00%
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)	0115			
8	Capital conservation buffer (%)	0120	2.50%	2.50%	2.50%
EU-8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0130			
9	Institution specific countercyclical capital buffer (%)	0140	1.00%	0.01%	0.01%
EU-9a	Systemic risk buffer (%)	0150			
10	Global Systemically Important Institution buffer (%)	0160			
EU-10a	Other Systemically Important Institution buffer (%)	0170			
11	Combined buffer requirement (%)	0180	3.50%	2.51%	2.51%
EU-11a	Overall capital requirements (%)	0190	11.50%	10.51%	10.51%
12	CET1 available after meeting the total SREP own funds requirements (%)	0200	9.63%	10.11%	11.02%
	Leverage ratio	0205			
13	Total exposure measure	0210	111 444	108 989	99 220
14	Leverage ratio (%)	0220	9.44%	9.63%	9.82%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)	0225			
EU-14a	Additional own funds requirements to address the risk of excessive leverage	0230			
EU-14b	of which: to be made up of CET1 capital (percentage points)	0240			
EU-14c	Total SREP leverage ratio requirements (%)	0250	3.00%	3.00%	3.00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of	0255			
EU-14d	Leverage ratio buffer requirement (%)	0260			
EU-14e	Overall leverage ratio requirement (%)	0270	3.00%	3.00%	3.00%
	Liquidity Coverage Ratio	0275			
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	0280	26 192	24 173	22 632
EU-16a	Cash outflows - Total weighted value	0290	13 406	13 684	14 191
EU-16b	Cash inflows - Total weighted value	0300	1 623	2 081	2 081

			31.12.2025	30.06.2025*	31.12.2024**
			a.	c.	e.
			0010	0030	0050
16	Total net cash outflows (adjusted value)	0310	11 783	11 603	12 110
17	Liquidity coverage ratio (%)	0320	222%	208%	187%
	Net Stable Funding Ratio	0325			
18	Total available stable funding	0330	82 570	78 943	76 180
19	Total required stable funding	0340	55 473	53 585	51 518
20	NSFR ratio (%)	0350	149%	147%	148%

* On September 18, 2025, the Polish Financial Supervision Authority (KNF) approved the inclusion of part of the net profit of the prudentially consolidated Alior Bank S.A. Capital Group for the first half of 2025 in the consolidated Common Equity Tier 1 capital of the Alior Bank S.A. Capital Group. Data as at June 30, 2025 were recalculated to include in own funds the net profit generated for the first half of 2025, for which the KNF approved it. Therefore, the table above presents changed data compared to the information published for 2025 in the report "Interim Disclosures in Respect of Pillar III of the Alior Bank Spółka Akcyjna Capital Group for the half-year ended June 30, 2025".

*On April 11, 2025, the Polish Financial Supervision Authority (KNF) approved the inclusion of a portion of the prudentially consolidated net profit of the Alior Bank SA Capital Group for 2024 in the prudentially consolidated Common Equity Tier 1 capital of the Alior Bank SA Capital Group. Data as at December 31, 2024, were recalculated to include the net profit generated for 2024 in own funds, for which the KNF approved it. Therefore, the table above presents changed data compared to the information published for 2024 in the report "Capital Adequacy and Other Information Subject to Disclosure of the Alior Bank Spółka Akcyjna Capital Group for the year ended December 31, 2024".

On 16 June 2025, the Annual General Meeting of the Bank adopted resolution No. 7/2025 on the method of distributing the Bank's profit for the financial year 2024

EU KM2 – Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

PLN m

				Minimum requirement for own funds and eligible liabilities MREL	G-SII Requirement for own funds and eligible liabilities TLAC					
					a. 31.12.2025	b. 31.12.2025	c. 30.09.2025	d. 30.06.2025	e. 31.03.2025	f. 31.12.2024
					0010	0020	0030	0040	0050	0060
Own funds and eligible liabilities, ratios and components			0009							
1	Own funds and eligible liabilities		0010	12 784	N/A	N/A	N/A	N/A	N/A	
EU-1a	Of which own funds and subordinated liabilities		0020	11 778						
2	Total risk exposure amount of the resolution group TREA		0030	59 643	N/A	N/A	N/A	N/A	N/A	
3	Own funds and eligible liabilities as a percentage of the TREA		0040	21.43%	N/A	N/A	N/A	N/A	N/A	
EU-3a	Of which own funds and subordinated liabilities		0050	19.75%						
4	Total exposure measure TEM of the resolution group		0060	111 444	N/A	N/A	N/A	N/A	N/A	
5	Own funds and eligible liabilities as percentage of the TEM		0070	11.47%	N/A	N/A	N/A	N/A	N/A	
EU-5a	Of which own funds or subordinated liabilities		0080	10.57%						
6a	Does the subordination exemption in Article 72b 4 of Regulation EU No 575/2013 apply? 5% exemption		0090		N/A	N/A	N/A	N/A	N/A	
6b	Aggregate amount of permitted non-subordinated eligible liabilities instruments if the subordination discretion in accordance with Article 72b 3 of Regulation EU No 575/2013 is applied max 3.5% exemption		0100		N/A	N/A	N/A	N/A	N/A	
6c	If a capped subordination exemption applies in accordance with Article 72b 3 of Regulation EU No 575/2013, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded liabilities and that would be recognised under row 1 if no cap was applied %		0110		N/A	N/A	N/A	N/A	N/A	
Minimum requirement for own funds and eligible liabilities MREL			0119							
EU-7	MREL expressed as a percentage of the TREA		0120	15.36%						
EU-8	Of which to be met with own funds or subordinated liabilities		0130	15.36%						
EU-9	MREL expressed as a percentage of the TEM		0140	5.91%						
EU-10	Of which to be met with own funds or subordinated liabilities		0150	5.91%						

Alior Bank SA is not a global systemically important institution (G-SII), therefore it is obliged to meet the minimum requirement in terms of own funds and eligible liabilities MREL.

EU TLAC1 – Composition - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

PLN m

			Minimum requirement for own funds and eligible liabilities MREL	G-SII requirement for own funds and eligible liabilities TLAC	Memo item: Amounts eligible for the purposes of MREL, but not of TLAC
			a	b	c
			0010	0020	0030
Own funds and eligible liabilities, ratios and components			0009		
1.	Common Equity Tier 1 capital CET1	0010	10 515	N/A	
2.	Additional Tier 1 capital AT1	0020		N/A	
3.	Empty set in the EU	0030			
4.	Empty set in the EU	0040			
5.	Empty set in the EU	0050			
6.	Tier 2 capital T2	0060		N/A	
7.	Empty set in the EU	0070			
8.	Empty set in the EU	0080			
11.	Own funds for the purpose of Articles 92a of Regulation EU No 575/2013 and 45 of Directive 2014/59/EU	0090	10 515	N/A	
Own funds and eligible liabilities: Non-regulatory capital elements			0099		
12.	Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities not grandfathered	0100	1 262	N/A	
EU-12a.	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities not grandfathered	0110		N/A	
EU-12b.	Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 subordinated grandfathered	0120		N/A	
EU-12c.	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	0130		N/A	
13.	Eligible liabilities that are not subordinated to excluded liabilities not grandfathered pre-cap	0140	1 007	N/A	
EU-13a.	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 pre-cap	0150		N/A	
14.	Amount of non subordinated eligible liabilities instruments, where applicable after application of Article 72b 3 CRR	0160	1 007	N/A	1 007
15.	Empty set in the EU	0170			
16.	Empty set in the EU	0180			
17.	Eligible liabilities items before adjustments	0190	2 269	N/A	
EU-17a.	Of which subordinated liabilities items	0200	1 262	N/A	
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements			0209		
18.	Own funds and eligible liabilities items before adjustments	0210	12 784	N/A	

			Minimum requirement for own funds and eligible liabilities MREL	G-SII requirement for own funds and eligible liabilities TLAC	Memo item: Amounts eligible for the purposes of MREL, but not of TLAC
			a	b	c
			0010	0020	0030
19.	Deduction of exposures between multiple point of entry (MPE) resolution groups		0220		
20.	(Deduction of investments in other eligible liabilities instruments)		0230		
21.	Empty set in the EU		0240		
22.	Own funds and eligible liabilities after adjustments		0250	12 784	N/A
EU-22a.		Of which: own funds and subordinated liabilities	0260	11 778	
Risk-weighted exposure amount and leverage exposure measure of the resolution group			0269		
23.	Total risk exposure amount TREA		0270	59 643	N/A
24.	Total exposure measure TEM		0280	111 444	N/A
Ratio of own funds and eligible liabilities			0289		
25.	Own funds and eligible liabilities as a percentage of TREA		0290	21.43%	N/A
EU-25a.		Of which own funds and subordinated liabilities	0300	19.75%	
26.	Own funds and eligible liabilities as a percentage of TEM		0310	11.47%	N/A
EU-26a.		Of which own funds and subordinated liabilities	0320	10.57%	
27.	CET1 as a percentage of the TREA available after meeting the resolution group's requirements		0330	9.63%	N/A
28.	Institution-specific combined buffer requirement		0340		N/A
29.		of which capital conservation buffer requirement	0350		N/A
30.		of which countercyclical buffer requirement	0360		N/A
31.		of which systemic risk buffer requirement	0370		N/A
EU-31a.		of which Global Systemically Important Institution G-SII or Other Systemically Important Institution O-SII buffer	0380		N/A
Memorandum items			0389		
EU-32.	Total amount of excluded liabilities referred to in Article 72a 2 of Regulation EU No 575/2013		0390		N/A

Alior Bank SA is not a global systemically important institution (G-SII), therefore it is obliged to meet the minimum requirement in terms of own funds and eligible liabilities MREL.

EU TLAC3b – Creditor ranking - resolution entity

PLN m

	Insolvency ranking					Insolvency ranking					Sum of 1 to 10	
	1	2	3	4	5	6	7	8	9	10		
	(most junior)					(most senior)						
1	Description of insolvency rank (free text)	Receivables due to liabilities included in the bank's own funds, referred to in Art. 26 of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013, as amended, including interest and enforcement costs	Receivables due to liabilities included in the bank's own funds, referred to in Art. 51 of Regulation No. 575/2013, along with interest and enforcement costs	Receivables due to liabilities included in the bank's own funds, referred to in Art. 62 of Regulation No. 575/2013, along with interest and enforcement costs	Receivables from subordinated liabilities not included in the bank's own funds, along with interest and enforcement costs	Receivables under bonds, together with interest and enforcement costs, excluding receivables in category 9, under other debt instruments that have the characteristics of negotiable receivables, or under instruments giving rise to the legal effects of debt financial instruments	Receivables of partners or shareholders arising from a loan or other legal transaction with similar effects, in particular the delivery of goods with deferred payment date, together with interest, if they are not subject to satisfaction in lower categories	Interest on receivables included in higher categories in the order in which the capital is satisfied, as well as judicial and administrative fines and receivables for donations and bequests	Other liabilities, if they cannot be satisfied in other categories, in particular taxes and other public levies and other liabilities due to social security contributions	Receivables from natural persons, micro-entrepreneurs, small and medium-sized enterprises in respect of funds covered by guarantee protection other than guaranteed funds within the meaning of Art. 2 point 65 of the Act of 10 June 2016 on the Bank Guarantee Fund	Receivables referred to in Art. 39 section 1 of the Act of 10 June 2016 on the Bank Guarantee Fund	
2	Empty set in the EU											
3	Empty set in the EU											
4	Empty set in the EU											
	Own funds and liabilities potentially eligible for meeting MREL	10 515				1 262		7	1 053	33		12 870
6	of which residual maturity ≥ 1 year < 2 years					451			53	32		536
7	of which residual maturity ≥ 2 year < 5 years					811		7	1 000	1		1 819
8	of which residual maturity ≥ 5 years < 10 years											
9	of which residual maturity ≥ 10 years, but excluding perpetual securities											
10	of which perpetual securities	10 515										10 515

EU INS1 – Insurance participations

PLN m

		Exposure value	Risk exposure amount
		a	b
		0010	0020
Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds	0010		

Alior Bank SA does not hold equity interests in insurance companies.

EU INS2 – Financial conglomerates information on own funds and capital adequacy ratio

PLN m

			31.12.2025
			a
			0010
1	Supplementary own fund requirements of the financial conglomerate (amount)	0010	
2	Capital adequacy ratio of the financial conglomerate (%)	0020	

Alior Bank SA is part of a financial conglomerate headed by PZU SA, the Bank itself does not calculate additional requirements for the financial conglomerate's own funds.

EU OVA – Institution risk management approach

Legal basis	Row number	Details
Point (f) of Article 435(1) CRR	a)	<p>As part of the risk appetite, the Bank's Management Board approved the expected levels of the Bank's key capital ratios for 2025 at the level of: total capital ratio - 12.00 % and Tier 1 capital ratio - 10.00%. The expected internal capital coverage ratio by own funds was approved at 1.5. Risk appetite levels for capital ratios remained at the same level as in 2024.</p> <p>The bank is still not identified as a systemically important institution, therefore there is no buffer of another systemically important institution (O-SII).</p> <p>In November 2025, the Polish Financial Supervision Authority (KNF) imposed an additional capital charge (P2G) on the Bank to absorb potential losses resulting from stress events. The total capital charges recommended under Pillar II (P2G) offset by the capital conservation buffer requirement are 2.73 percentage points at the individual level and 2.26 p.p. at the consolidated level.</p> <p>The structure of the assessed risk exposure measured by the capital requirement for individual types of risk throughout 2025 remained at a level consistent with the structure of the risk exposure in the entire banking sector in Poland.</p> <p>The structure of the assessed risk exposure confirms the dominance of credit risk exposure in the total risk exposure. In accordance with its policy, the Bank does not maintain significant exposure to market risk, therefore its share in the exposure structure is small. The share of operational risk exposure was close to the average for the Polish banking sector.</p>
Point (b) of Article 435(1) CRR	b)	<p>In order to efficiently and effectively manage the risk system at Alior Bank SA, the supervision, control and responsibility for the operation of this system have been entrusted to:</p> <ul style="list-style-type: none"> the Supervisory Board, the Risk Committee of the Supervisory Board,

Legal basis	Row number	Details
		<ul style="list-style-type: none"> • the Bank's Management Board, • Committees (Capital, Assets and Liabilities Management Committee - CALCO, Operational Risk Committee, Credit Risk Committee and Business Initiatives Committee, Model Risk Committee, Bank Credit Committee), • organizational units responsible for particular types of risk.

The risk management system in place at the Bank is based on three independent lines of defense. Its framework is set by standards applicable in the banking sector and guidelines contained in regulations, including supervisory recommendations, which are reflected in the applicable internal regulations.

The Supervisory Board oversees the Group's risk management system, the compliance of the Group's risk-taking policy with the Group's strategy and financial plan, and assesses the adequacy and effectiveness of this system, in particular through:

- approval of the risk appetite defined by the Bank's Management Board for a given year and monitoring of its compliance,
- approval of the risk management strategy adopted by the Bank's Management Board and monitoring of its compliance,
- supervision over the development, adoption and implementation of policies and procedures on the basis of which the risk management system is to function in the Group,
- defining the rules for reporting to the Supervisory Board on the types and size of risk in the activity in a way that allows the supervision of the risk management system in the Group,
- annual assessment of the adequacy and effectiveness of the risk management system.

The Risk Committee of the Supervisory Board supports the Supervisory Board in supervision over the Group's risk management system. The Committee operates based on the Rules of Procedure of the Risk Committee of the Supervisory Board of Alior Bank approved by the Supervisory Board. The most important tasks of the Risk Committee of the Supervisory Board include in particular:

- supporting the Bank's Supervisory Board in supervising the risk management system at the Bank,
- giving opinions on the Bank's overall, current and future readiness to take risk,
- giving opinions on the Bank's risk management strategy and analyzing the information submitted by the Management Board regarding the implementation of this strategy,
- monitoring issues related to the implementation of the audit plan and recommendations issued by the Audit Department,
- issuing opinions/conclusions on materials regarding the risk management system, including with regard to the annual report of the Risk Strategy Department, Compliance Department, Audit Department, in order for the Bank's Supervisory Board to assess the adequacy and effectiveness of the internal control system and risk management system,
- supporting the Bank's Supervisory Board in overseeing the implementation of the Bank's risk management strategy by senior management,
- verification of compliance of the price of liabilities and assets offered to clients with the Bank's business model and its risk strategy; in the event of non-compliance, presenting to the Bank's Management Board proposals to ensure the adequacy of the prices of liabilities and assets to these types of risk,
- issuing opinions on regulations defining the Bank's strategy and approach to risk-taking,
- analysis of periodic reports on the implementation of the above strategies and policies.

In 2025, 11 meetings of the Risk Committee of the Supervisory Board and 1 combined meeting of the Risk Committee of the Supervisory Board and the Audit Committee of the Supervisory Board were held.

Legal basis	Row number	Details
		<p>The Management Board of the Bank designs, implements and ensures the operation of a coherent risk management system in the Group, adjusted to the risk profile, including the rules for managing individual risk types of the Group, ensuring their consistency with the Group's risk management strategy, and determining the risk appetite. Moreover, the Management Board determines the organizational structure of the Bank, including foreign branches, taking care to properly divide the roles that are key to risk management. In the effective management of individual risks, the Board is supported by Committees established for this purpose. The Committees take decisions and make recommendations at standing meetings or by circulation.</p> <p>The objective of the Capital, Assets and Liabilities Management Committee (CALCO) is to support the Bank's Management Board in effective management of market risk, liquidity risk, counterparty risk, business risk, capital risk and excessive leverage risk, as well as to supervise the operation of the Recovery Plan.</p> <p>In 2025, the CALCO Committee held 42 meetings.</p> <p>The Operational Risk Committee (KRO) was established to support the Bank's Management Board in the effective management of operational risk, including issues related to the maladjustment or unreliability of processes, the operation of people and systems or resulting from external threats, including significant subsidiaries. The Committee monitors the level of exposure to operational risk and assesses the situation in the area of operational risk throughout the Bank.</p> <p>In 2025 the Operational Risk Committee held 12 meetings.</p> <p>The objective of the Credit Risk Committee and Business Initiatives Committee is to support the Bank's Management Board in effective management of the Bank's credit risk, including credit concentration risk.</p> <p>In 2025, the Credit Risk and Business Initiatives Committee held 14 meetings.</p> <p>The Model Risk Committee supports the Bank's Management Board in the effective management of model risk, taking into account significant subsidiaries where model risk has been recognized as material under the Internal Capital Adequacy Assessment Process (ICAAP).</p> <p>In 2025, the Model Risk Committee held 14 meetings.</p> <p>The subject of the Bank's Credit Committee is to approve credit decisions on the Bank's on-balance sheet and off-balance sheet exposure, to make decisions on the introduction of special offers and to make decisions on all matters not regulated in the Credit Competence Rules, which involve the Bank taking credit risk, up to the limit of competences granted to Bank's Credit Committee, and recommending to the Bank's Management Board credit decisions for exposures exceeding the limit granted to the committee.</p> <p>In 2025, the Bank's Credit Committee held 107 meetings.</p> <p>The Bank supervises the functioning of the subsidiaries of the Bank's Capital Group. The Bank supervises the risk management systems in these entities and takes into account the level of risk related to the activities of individual entities as part of the risk monitoring and reporting system at the level of the Bank's Group.</p> <p>The Risk Materiality Group is responsible for the risk review at Alior Bank SA. The Group is composed of representatives of individual divisions and areas of the Bank's operations, having appropriate knowledge of the current and potential risk. In particular, they are representatives of units responsible for managing credit risk, market risk and operational risk.</p> <p>Due to the variety of phenomena accompanying particular types of risk, each of them is managed by the appropriate leading unit. In the case of credit risk, individual functions related to identification, measurement, assessment and monitoring have been divided among several organizational units. The detailed scope of tasks of individual units is presented when discussing each type of risk.</p>

Legal basis	Row number	Details
		The Audit Department conducts independent audits to provide the Supervisory Board and the Management Board of the Bank with objective information regarding the assessment of the effectiveness and adequacy of the risk management system in the Bank's Capital Group.
Point (e) of Article 435(1) CRR	c)	The implemented and applied risk management system in the Group is appropriate from the point of view of the Group's profile and strategy.
Point (c) of Article 435(1) CRR	d)	Risk measurement and assessment includes the determination of risk measures adequate to the materiality of a given type of risk and risk quantification using the established measures, as well as risk assessment consisting in determining the level of risk that may pose a threat to the achievement of the Group's strategic goals. As part of the risk measurement, stress tests are carried out on the basis of assumptions ensuring reliable risk assessment, which include an analysis of the impact of changes in the environment and functioning of the Group on its financial and capital position. The measurement results are regularly reported to the Bank's authorities and designated organizational units.
Point (c) of Article 435(1) CRR	e)	Risk reporting consists in regularly providing the Supervisory Board, the Management Board, committees and organizational units of the Bank indicated by the Management Board with reliable and regular information on changes in the size and profile of the Group's risk, as well as on the undertaken and recommended actions in the field of risk management. The scope, frequency and form of reporting are adjusted to the management level of the recipients, which is regulated in detail in the Bank's internal regulations.
Point (a) of Article 435(1) CRR	f)	<p>Credit risk</p> <p>Credit risk management and keeping it at a safe level, defined in the risk appetite, is of fundamental importance for the Bank's stable operation and development. Credit risk is controlled by the credit risk management system in place at the Bank, which is comprehensive and integrated with the Bank's operational processes.</p> <p>The description of the risk control system operation is reflected in the regulations in force at the Bank, in particular in the lending methodologies and risk valuation models tailored to the client's segment, product and transaction type, rules for establishing and monitoring legal loan collateral, and monitoring and debt collection processes.</p> <p>By managing the risk (both on an individual and portfolio basis), the Bank takes actions that lead to:</p> <ul style="list-style-type: none"> • minimizing the level of credit risk of a single loan with the assumed profitability level, • reduction of the total credit risk resulting from the Bank's specific loan portfolio. <p>As part of minimizing the risk of a single exposure, the Bank assesses each time when granting a loan product:</p> <ul style="list-style-type: none"> • credibility and creditworthiness of the client, taking into account, inter alia, detailed analysis of the source of exposure repayment, • credibility of the accepted collateral, including verification of their formal, legal and economic status, taking into account, inter alia, LTV adequacy • undertakes effective monitoring and debt collection activities adequately defined at the level of a single client thanks to the segmentation models used. <p>In order to maintain the credit risk at the level defined in the risk appetite, the Bank takes the following actions:</p> <ul style="list-style-type: none"> • sets and controls concentration limits, • monitors the structure and quality of a new credit exposure in relation to the defined objectives and signals of EWS, • analyzes changes in internal factors as well as market and geopolitical factors and the sensitivity of the loan portfolio, particularly with regard to negative events identified as potential risks, • regularly monitors the loan portfolio, controlling all significant parameters of credit risk (including SRC,PD, LGD, LTV, DTI, COR, NPE, NPL),

Legal basis	Row number	Details
		<ul style="list-style-type: none"> regularly carries out stress tests. <p>In addition to individual organizational units in the credit risk management process, an active role is played by the Supervisory Board, the Bank's Management Board, the Credit Risk Committee and Business Initiatives Committee and the Bank's Credit Committee.</p> <p>Operational risk</p> <p>The Bank has a formal operational risk management system that prevents the occurrence of operational events and limits losses in the event of risk materialization.</p> <p>Operational risk management includes the identification, measurement and assessment of operational risk, management activities and risk monitoring and control at all levels, from organizational units responsible for operational risk management in their areas, operational risk coordinators, through the Operational Risk Management Department, the Operational Risk Committee, to Management Board and Supervisory Board. An element of operational risk management is also reporting the level of this risk, both for internal and external purposes. The recipients, frequency and type of management information in operational risk reports are described in the Management Information System Principles (approved at the level of the Bank's Management Board).</p> <p>As part of the identification of operational risk, the Bank recognizes risk factors that significantly influence its level. At the identification stage, various methods of obtaining information are used, including:</p> <ul style="list-style-type: none"> collecting data on events and losses at the Bank, identifying risks in products, processes, systems, contracts and business reports (projects, initiatives), analysis of external operational risk events. <p>Measurement and assessment of operational risk are carried out using quantitative and qualitative measures and include, among others:</p> <ul style="list-style-type: none"> the new standardised approach (SMA) is used to determine the own funds requirements for operational risk for Alior Bank S.A. and at the consolidated level of the Alior Bank S.A. Capital Group, estimation of the Bank's internal capital for operational risk using the results of the internal model, scenario analyses, self-assessment of operational risk of products, processes, systems, contracts and business notifications, setting an internal target and a limit for operational risk costs, determining the level of target utilization and the limit for operational risk costs, setting business goals for operational risk costs, KRI, valuation of actual and potential losses related to identified operational events, conducting Stress Tests. <p>From 2025, for the purposes of determining own funds requirements for operational risk for Alior Bank S.A. and at the consolidated level of the Alior Bank S.A. Capital Group a new standard approach (SMA) is used, in accordance with the guidelines of the Regulation of the European Parliament and of the Council (EU) of 31 May 2024 amending Regulation (EU) No. 575/2013 with regard to requirements regarding credit risk, risk related to credit valuation adjustments, operational risk, market risk and the minimum capital threshold (Resolution No. 459/2024 of the Management Board of Alior Bank S.A. of December 30, 2024).</p> <p>Market risk</p> <p>The following types of market risk have been identified in the Bank and are subject to management:</p> <ul style="list-style-type: none"> interest rate risk in the banking book,

Legal basis	Row number	Details
Points (a) and (d) of Article 435(1) CRR	g)	<p>• market risk in the trading book (including interest rate risk in the trading book, currency risk and commodity price risk).</p> <p>The objective of market risk management is to limit potential losses due to changes in market risk factors to an acceptable level by appropriately shaping the structure of the balance sheet and off-balance sheet items. The Bank distinguishes the following market risk factors:</p> <ul style="list-style-type: none"> • exchange rates, • interest rate indices, • stock / index prices, • prices of goods, • credit spread related to the rating of a given issuer, • options volatility parameters. <p>The Bank has a clear division of competences in the area of market risk management, including:</p> <ul style="list-style-type: none"> • concluding treasury transactions, • measurement, monitoring and reporting of market risk, • transaction settlement process, • operational service and operational support for business processes. <p>Supervision over the above-mentioned activities related to concluding transactions as well as independent measurement and reporting of risk at the Bank has been distributed to the level of a Management Board Member, which guarantees full independence of their operations.</p> <hr/> <p>Credit risk</p> <p>Collaterals are established in relation to the credit risk incurred by the Bank and in a flexible manner to the client's abilities. Its establishment does not release the Bank from the obligation to examine the customer's creditworthiness.</p> <p>The purpose of securing the loan is to provide the Bank with the repayment of the granted loan together with the interest and costs due, if the borrower fails to pay the amounts due within the time limits specified in the loan agreement and the restructuring activities do not bring the expected results. Details in points b and c of EU CRC - Qualitative disclosure requirements related to CRM techniques.</p> <p>Operational risk</p> <p>In order to limit the risk of materializing the effects of rare but potentially severe operational events, the Bank purchased a number of insurance policies. The above-mentioned policies included, among others: insurance in the field of: property (including electronic equipment), civil liability, fiscal penal liability and professional liability. The terms of individual policies are adapted to the scale and scope of the risk incurred.</p> <p>An important element of operational risk management at Alior Bank is business continuity management (BCM). As part of BCM, the Bank implements the BCM system and strategies in accordance with the Business Continuity Management Policy and the ICT Business Continuity Management Strategy approved by the Bank's Management Board.</p> <p>The above aspect is also regulated by the "ICT Business Continuity Management Policy" introduced by the Decision of the Vice-President of the Bank responsible for the IT Area.</p> <p>As part of the BCM Bank system, periodically:</p> <ul style="list-style-type: none"> • analyzes business processes / operational activities, • reviews and updates the strategy for action in emergency and crisis situations, • develops and implements emergency solutions and Business Continuity Plans (BCP), • performs tests, updates and self-assessment of the BCM system, • builds awareness in the organization in the field of BCM. <p>The implementation of the agreed BCM system and strategy is intended to ensure the implementation of critical business processes in the event of an unplanned disruption.</p> <p>The bank has periodically tested emergency solutions for the implementation of critical processes (including replacement locations) and disaster recovery solutions.</p>

Legal basis	Row number	Details
		<p>Market risk</p> <p>Market risk is limited by a system of limits and warning thresholds as well as an appropriate number of regulations defining the framework of the Bank's operations in terms of exposure to market risk. The limits are defined in particular in the form of the market risk appetite at the level of the Bank's Supervisory Board. Moreover, the CALCO Committee additionally limits the market risk with supplementary limits.</p> <p>Market risk is hedged by appropriate shaping of the Bank's balance sheet structure (natural hedge) and by concluding appropriate hedging transactions. Some of the hedging transactions are designated for hedge accounting, both for cash flow volatility and fair value volatility.</p>

EU OVB – Disclosure on governance arrangements

Legal basis	Row number	Details
Point (a) of Article 435(2) CRR	a)	<p>As at December 31, 2025, members of the Bank's Management Board: Piotr Żabski (President of the Bank's Management Board), Marcin Ciszewski (Vice-President of the Bank's Management Board), Zdzisław Wojtera (Vice-President of the Bank's Management Board), Jacek Iljin (Vice-President of the Bank's Management Board), Wojciech Przybył (Vice-President of the Bank's Management Board) Beata Stawiarska (Vice-President of the Bank's Management Board).</p> <p>Members of the Bank's Management Board, in addition to their positions at Alior Bank S.A., held the following positions:</p> <p>Piotr Żabski, Polski Standard Płatności sp. z o.o. – Member of the Supervisory Board, Jacek Iljin, Alior TFI S.A. – Chairman of the Supervisory Board, Wojciech Przybył, Alior Leasing sp. z o.o. – Chairman of the Supervisory Board, Zdzisław Wojtera, System Ochrony Banków Komercyjnych S.A. – Member of the Supervisory Board.</p>
Point (b) of Article 435(2) CRR	b)	<p>The following applies at Alior Bank Spółka Akcyjna: Policy for the selection and assessment of suitability of members of the Management Board of Alior Bank S.A. and Policy for selection and assessment of suitability of members of the Supervisory Board of Alior Bank S.A. , taking into account, among others, the provisions of the Methodology for assessing the suitability of bodies of entities supervised by the Polish Financial Supervision Authority (hereinafter referred to as the "Methodology").</p> <p>In relation to members of the Management Board, its purpose is to fulfill obligations arising from legal provisions and support the implementation of the Bank's strategy by ensuring that the functions of members of the Management Board are performed by persons with knowledge, skills and experience appropriate to the functions they perform and the duties entrusted to them, and provide a guarantee proper performance of these duties.</p> <p>In order to ensure the individual suitability of the Management Board members, the Nomination and Remuneration Committee of the Supervisory Board and then the Supervisory Board assess the initial suitability of the candidates and, based on this assessment, decides on appointment to the Management Board. The collective suitability of the body is also assessed.</p> <p>The Nomination and Remuneration Committee of the Supervisory Board and the Supervisory Board periodically (once a year) verify the suitability of the Management Board members, making a secondary assessment of the individual suitability of individual Management Board members and assessing the collective suitability of the Management Board. Secondary evaluation of Management</p>

Legal basis	Row number	Details
		Board members also takes place in the event of changes in the areas subject to evaluation according to the Methodology.
<p>Point (c) of Article 435(2) CRR</p>	c)	<p>The Bank makes efforts to ensure diversity of the Management Board, in particular in terms of education and professional experience, specialist knowledge, gender and age of the Management Board members, to the extent that ensures a broad spectrum of views of the management body. When selecting the composition of the Management Board, the Bank aims to achieve a balance in terms of gender representation in this body, the total number of positions in the Management Board and the Supervisory Board of the Bank held by persons of the underrepresented gender at a level no lower than the number closest to 33% of all positions in both bodies, in a situation where at least one person of the underrepresented gender holds a position in the Management Board of the Bank. In order to achieve the assumed target share of both genders in the Management Board, the Nomination and Remuneration Committee ensures the participation of both sexes in the process of selecting Management Board members and equal treatment of candidates regardless of gender. In cases where the selection process for a position on the Bank's Management Board involves a choice between candidates with equivalent qualifications, priority is given to the candidate of the gender that is underrepresented in the Bank's bodies, unless other diversity principles specified in legal provisions, based on non-discriminatory criteria, justify the selection of a candidate of the opposite gender. When assessing the diversity of the Bank's Management Board Members in terms of education and professional experience, the following criteria may be taken into account: place (country, region) of obtaining education or professional experience, educational profile, field of study, specialization in a specific field, type of entities in which the candidate for a Bank's Management Board Member held a position or was employed, and length of service. The Bank recruits Members of the Bank's Management Board taking into account, first of all, the criteria specified above - necessary for the proper functioning and suitability of the Bank's Management Board as a whole. As part of its annual review of the composition of the Bank's Management Board, the Nomination Committee assesses its compliance with the objectives and target values referred to above. If these are not met, it should document the reasons for non-compliance, the measures that will be taken, and the deadlines for their implementation to ensure the objectives and values are met. The composition of the Bank's Management Board should not be shaped solely for the purpose of increasing diversity at the expense of the functioning and suitability of the Management Board as a whole or the suitability of individual members of the Bank's Management Board.</p>
<p>Point (d) of Article 435(2) CRR</p>	d)	<p>The Risk Committee of the Supervisory Board of Alior Bank S.A. was established on 22 December 2015 by Resolution No. 81/2015 of the Supervisory Board to support the Supervisory Board in overseeing the risk management process at the Bank.</p> <p>The Committee operates based on the Rules of Operation of the Risk Committee of the Supervisory Board of Alior Bank S.A. approved by the Supervisory Board.</p> <p>Meetings of the Committee are held in accordance with the work plan adopted by the Committee, generally on a monthly basis.</p>
<p>Point (e) Article 435(2)</p>	e)	<p>Reporting to the management body is carried out in accordance with the principles described in the Regulation of the Management Information System (approved at the level of the Bank's Management Board).</p> <p>Management reporting is carried out in the following cycles:</p> <p>Monthly:</p> <ul style="list-style-type: none"> • the monthly information for the Bank's Management Board is to present to the Bank's Management Board the aggregated results of the implementation of the Bank's strategy in terms of individual risks in relation to the adopted risk appetite, • the implementation of key risk indicators, including the risk appetite in the credit portfolio of the Alior Bank Group, involves presenting the aggregated results of the implementation

Legal basis	Row number	Details
		<p>of the Bank's strategy in terms of individual risks in relation to the adopted risk appetite to the Bank's Management Board and the Risk Committee of the Supervisory Board.</p> <p>Quarterly:</p> <ul style="list-style-type: none"> quarterly information for the Bank's Management Board, the Risk Committee of the Supervisory Board and the Supervisory Board is the presentation to the Management Board of the Bank, the Risk Committee of the Supervisory Board and the Supervisory Board of the aggregated results of the implementation of the Bank's strategy in terms of individual risks in relation to the adopted risk appetite. <p>Semi-annual:</p> <ul style="list-style-type: none"> report on the assessment of outsourcing and sensitive services in terms of operational risk for the Bank's Management Board and Supervisory Board, <p>Annual:</p> <ul style="list-style-type: none"> summary of annual risk results, including accounting for risk appetite and risk policy implementation for the previous year, report on information technology risk at Alior Bank for the Bank's Management Board and the Risk Committee of the Supervisory Board, annual report – Operational risk management in the Alior Bank S.A. Group. for the Bank's Management Board, the Risk Committee of the Supervisory Board and the Supervisory Board, includes a summary of the implementation of the operational risk management strategy and policy.

EU OVC – ICAAP information

Legal basis	Row number	Details
Article 438(a) CRR	a)	<p>Alior Bank SA has an internal capital adequacy assessment process (ICAAP) in line with the Regulation of the Minister of Finance, Funds and Regional Policy of 3 August 2021 on the detailed method of internal capital estimation and bank reviews.</p> <p>The purpose of the internal capital adequacy assessment process is to ensure that all risks to which the Bank is exposed are analyzed in terms of materiality and that the Bank has an adequate amount of capital to cover the risks deemed material.</p> <p>The process includes the following phases:</p> <ul style="list-style-type: none"> identification of material risks - performed as part of the process review on an annual basis, or more frequently in justified cases, quantification of individual risks and total internal capital - performed on an ongoing basis, stress testing - performed on an annual basis or more frequently in justified cases, reporting and monitoring of capital goals, including available capital allocation limits - cyclically, capital management and capital planning - performed on an ongoing basis in order to ensure the adequacy of internal capital, process review - performed on an annual basis, or more often in justified cases.
Article 438(c) CRR	b)	<p>The Bank did not have any additional regulatory requirements with regard to own funds and their structure based on the supervisory review process referred to in Art. 104 sec. 1 lit. a) Directive 2013/36/EU.</p>

EU LI1 – Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories

PLN m

		Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items				
				Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
		a	b	c	d	e	f	g
		0010	0020	0030	0040	0050	0060	0070
Breakdown by asset classes according to the balance sheet in the published financial								
1	Cash and cash equivalents	4 063	4 058	4 058				
2	Amounts due from banks	2 203	2 203	877	1 326			
3	Debt securities and derivatives	26 510	26 492	26 244	248		189	
	measured at fair value through other comprehensive income	22 543	22 540	22 540				
	measured at fair value through profit or loss	371	356	108	248		189	
	measured at amortized cost	3 596	3 596	3 596				
4	Derivative hedging instruments	660	660		660			
5	Loans and advances to customers	65 451	65 451	65 036	415			
6	Property, plant and equipment	829	829	829				
7	Intangible assets	551	551	101				450
8	Investments in associates	0	75	75				
9	Income tax asset	724	723	685				38
10	Other assets	784	780	780				
Total assets		101 775	101 822	98 685	2 649		189	488

		Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items				
				Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
		a	b	c	d	e	f	g
		0010	0020	0030	0040	0050	0060	0070
Breakdown by liability classes according to the balance sheet in the published								
1	Amounts due to banks	589	589					
2	Amounts due to customers	82 621	82 679					
3	Financial liabilities	327	327		268		167	
4	Derivative hedging instruments	69	69		69			
5	Fair value changes of the hedged items in portfolio hedge of interest rate risk	202	202					
6	Provisions	404	404					
7	Other liabilities	2 040	2 033					
8	Income tax liabilities	218	217					
9	Debt securities issued	2 322	2 322					
Total liabilities		88 792	88 842		337		167	

EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements

PLN m

			Total				
			Items subject to				
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework	
			a	b	c	d	
			0010	0020	0030	0040	0050
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	0010	101 822	98 865		2 649	189
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	0020	88 842			337	167
3	Total net amount under the scope of prudential consolidation	0030	12 980	98 685		2 312	22
4	Off-balance-sheet amounts	0040	17 123	17 123			
5	Differences in valuations	0050					
6	Differences due to different netting rules, other than those already included in row 2	0060					
7	Differences due to consideration of provisions	0070	-102	-102			
8	Differences due to the use of credit risk mitigation techniques (CRMs)	0080	-169	-169			
9	Differences due to credit conversion factors	0090	8 904	8 904			
10	Differences due to Securitisation with risk transfer	0100					
11	Other differences	0110	916	958		-42	
12	Exposure amounts considered for regulatory purposes	0120	109 861	107 591		2 270	25

EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)

	Name of the entity	Method of prudential consolidation	Method of accounting consolidation				Description of the entity	
			Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted		Deducted
			a	b	c	d		e
0009	0010	0020	0030	0040	0050	0060	0070	
1	Alior Services Sp. z o.o.	Full consolidation				x		The company operates as an insurance agent for 7 insurance companies (contract administration).
2	Alior Leasing Sp. z o.o.	Full consolidation	x					<p>The company provides fixed asset financing through operational and financial leasing, as well as lease loans. The company has its own sales network of Leasing Advisors responsible for servicing Alior Bank clients and collaborating with external partners – vehicle, machinery, and equipment dealers. The company's strategic goal is to expand its cooperation with Alior Bank in the corporate client segment, continue its dynamic growth among SME and sole proprietorship clients, and increase its presence among machinery and equipment dealers by tailoring its offerings to the needs of clients in the industrial and medical sectors. The Alior Leasing Capital Group also includes:</p> <ul style="list-style-type: none"> AL Finance sp.z o.o., which specializes in property and motor insurance for clients with lease or lease loan agreements Alior Leasing Individual sp. z o.o., which was established to implement Alior Leasing's strategy for consumer-facing products. Currently, it provides consumer leasing/car rental services on a subscription basis through the internal channels of PZU Group companies and is dedicated to Group employees. Ultimately, the scope of its operations will also include the rental of consumer electronics and household appliances, including consumer electronics, IT equipment, household appliances, and smartphones. Upon broad market entry, distribution will take place through Alior Bank's Trading Partners. This activity will be carried out in close cooperation with Alior Leasing and Alior Bank and will expand the Group's product portfolio.
3	Meritum Services ICB SA	Full consolidation				x		The company conducts service activities in the field of information and computer technologies and provides IT software services.
4	Alior TFI SA	Full consolidation				x		The company's core business is asset management. The bank's collaboration with its subsidiary, Alior TFI, primarily involves the distribution of ALIOR SFIO units. The company continues to hold a license to manage portfolios comprising one or more financial instruments.

	Name of the entity	Method of prudential consolidation	Method of accounting consolidation					Description of the entity
			Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
			a	b	c	d	e	
0009	0010	0020	0030	0040	0050	0060	0070	
5	Corsham Sp. z o.o.	Full consolidation				x		A company dedicated to implementing venture capital investments. Pursuant to Resolution No. 434/2023 of the Bank's Management Board dated 13 December 2023, the Bank's Management Board decided to discontinue further investment activities.
6	RBL_VC Sp. z o.o.	Full consolidation				x		A company dedicated to managing companies making venture capital investments has been entered into the register of Alternative Investment Company Managers (ZASI).
7	RBL_VC Sp. z o.o. ASI spółka komandytowo-akcyjna	Full consolidation				x		It is an investment vehicle used by Alior Bank SA to make venture capital investments. Pursuant to Resolution No. 434/2023 of the Bank's Management Board dated 13 December 2023, the Bank's Management Board decided to discontinue further investment activities. By Resolution No. 469/2025 of 16 December 2025, the Bank's Management Board granted directional consent to the liquidation of the company as part of the simplification of the structure of the Bank's Capital Group.

Detailed information on the structure of the Alior Bank SA Capital Group is included in the Consolidated Financial Statements of the Alior Bank Group for the year ended 31 December 2025.

EU LIA – Explanations of differences between accounting and regulatory exposure amounts

Legal basis	Row number	Details
Article 436(b) CRR	a)	<p>The scope of companies subject to prudential consolidation differs from the scope of companies subject to financial consolidation carried out in accordance with the International Financial Reporting Standards.</p> <p>In 2025, Alior Bank SA and Alior Leasing sp. z o.o. were covered by prudential consolidation. In the opinion of the Bank's Management Board, other subsidiaries were not subject to prudential consolidation due to their insignificant scale of operations in the Bank's Capital Group.</p> <p>The differences between the accounting and prudential scope of consolidation result from the financial data of other companies not included in the prudential consolidation, and from accounting consolidation exclusions.</p>
Article 436(d) CRR	b)	<p>The main difference between the accounting and prudential scope of consolidation is "Investments in associates", the Bank's shares in subsidiaries not prudentially consolidated.</p>

EU LIB – Other qualitative information on the scope of application

Legal basis	Row number	Details
Article 436(f) CRR	a)	<p>In the case of other entities belonging to the Alior Bank SA Capital Group, the Bank does not identify any significant obstacles to the transfer of funds for recapitalization of entities and the repayment of their liabilities.</p>
Article 436(g) CRR	b)	<p>The Bank does not have subsidiaries not covered by consolidation, whose own funds are lower than required.</p>
Article 436(h) CRR	c)	<p>The Bank does not apply the derogations referred to in Art. 7 of CRR, or the individual consolidation method specified in Art. 9 of CRR.</p>
Article 436(g) CRR	d)	<p>Due to the above, this disclosure does not apply to the Alior Bank Group.</p>

EU PV1 – Prudent valuation adjustments (PVA)

PLN m

			Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification		
			Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book	
			a	b	c	d	e	EU e1	EU e2			f
Category level AVA		0009	0010	0020	0030	0040	0050	0060	0070	0080	0090	0100
1	Market price uncertainty	0010										
2	Not applicable	0020										
3	Close-out cost	0030										
4	Concentrated positions	0040										
5	Early termination	0050										
6	Model risk	0060										
7	Operational risk	0070										
8	Not applicable	0080										
9	Not applicable	0090										
10	Future administrative costs	0100										
11	Not applicable	0110										
12	Total Additional Valuation Adjustments	0120								24		

To calculate a prudent valuation adjustment (AVA), the bank uses the simplified method, in accordance with Art. 4, Commission Delegated Regulation (EU) 2016/101 of 26 October 2015 supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to prudent regulatory technical standards in accordance with Art. 105 paragraph. 14, the sum of the absolute value of assets and liabilities measured at fair value as reported in the institution's financial statements in accordance with the applicable accounting framework is less than EUR 15 billion.

EU CC1 – Composition of regulatory own funds

PLN m			Amounts		Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
			a	b	
			0010	0020	
Common Equity Tier 1 (CET1) capital: instruments and reserves			0009		
1	Capital instruments and the related share premium accounts	0010	5 182	EU CC2 pos. P10 +P11.1	
	Series A				
	Series B				
	Series C				
	Series D,E, F				
	Series G				
	Series H				
	Series I, J				
2	Retained earnings	0050	78	EU CC2 pos. P14.1	
3	Accumulated other comprehensive income (and other reserves)	0060	5 354	EU CC2 pos. P11+P.12+P13	
EU-3a	Funds for general banking risk	0070			
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	0080			
5	Minority interests (amount allowed in consolidated CET1)	0090			
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	0100	558	EU CC2 pos. P14.3	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	0110	11 173		
Common Equity Tier 1 (CET1) capital: regulatory adjustments			0119		
7	Additional value adjustments (negative amount)	0120	-24		
8	Intangible assets (net of related tax liability) (negative amount)	0130	-450	EU CC2 pos. A7	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	0140			
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	0150	-126		
12	Negative amounts resulting from the calculation of expected loss amounts	0160			
13	Any increase in equity that results from securitised assets (negative amount)	0170			
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	0180			
15	Defined-benefit pension fund assets (negative amount)	0190			
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	0200			
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0210			
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0220			

PLN m			Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
			a	b
			0010	0020
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0230		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	0240		
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	0250		
EU-20c	of which: securitisation positions (negative amount)	0260		
EU-20d	of which: free deliveries (negative amount)	0270		
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	0280		
22	Amount exceeding the 17,65% threshold (negative amount)	0290		
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	0300		
25	of which: deferred tax assets arising from temporary differences	0310		
EU-25a	Losses for the current financial year (negative amount)	0320		
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	0330		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	0340		
27a	Other regulatory adjustments	0350	-57	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	0360	-657	
29	Common Equity Tier 1 (CET1) capital	0370	10 515	
Kapitał dodatkowy Tier I: instrumenty		0379		
30	Capital instruments and the related share premium accounts	0380		
31	of which: classified as equity under applicable accounting standards	0390		
32	of which: classified as liabilities under applicable accounting standards	0400		
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	0410		
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	0420		
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	0430		
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	0440		
35	of which: instruments issued by subsidiaries subject to phase out	0450		
36	Additional Tier 1 (AT1) capital before regulatory adjustments	0460		
Additional Tier 1 (AT1) capital: regulatory adjustments		0469		
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	0470		
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0480		

PLN m			Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
			a	b
			0010	0020
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0490		
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	0500		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	0510		
42a	Other regulatory adjustments to AT1 capital	0520		
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	0530		
44	Additional Tier 1 (AT1) capital	0540		
45	Tier 1 capital (T1 = CET1 + AT1)	0550	10 515	
Tier 2 (T2) capital: instruments		0559		
46	Capital instruments and the related share premium accounts	0560		
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	0570		
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	0580		
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	0590		
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	0600		
49	of which: instruments issued by subsidiaries subject to phase out	0610		
50	Credit risk adjustments	0620		
51	Tier 2 (T2) capital before regulatory adjustments	0630		
Tier 2 (T2) capital: regulatory adjustments		0639		
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	0640		
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0650		
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0660		
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	0670		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	0680		
EU-56b	Other regulatory adjustments to T2 capital	0690		
57	Total regulatory adjustments to Tier 2 (T2) capital	0700		
58	Tier 2 (T2) capital	0710		
59	Total capital (TC = T1 + T2)	0720	10 515	
60	Total Risk exposure amount	0730	59 643	
Capital ratios and requirements including buffers		0739		

PLN m

			Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
			a	b
			0010	0020
61	Common Equity Tier 1 capital	0740	17.63%	
62	Tier 1 capital	0750	17.63%	
63	Total capital	0760	17.63%	
64	Institution CET1 overall capital requirements	0770	8.00%	
65	of which: capital conservation buffer requirement	0780	2.50%	
66	of which: countercyclical capital buffer requirement	0790	1.00%	
67	of which: systemic risk buffer requirement	0800		
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0810		
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0820		
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	0830	9.63%	
National minima (if different from Basel III)		0839		
69	not applicable	0840		
70	not applicable	0850		
71	not applicable	0860		
Amounts below the thresholds for deduction (before risk weighting)		0869		
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	0870		
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	0880	264	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	0890	715	
Applicable caps on the inclusion of provisions in Tier 2				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	0900		
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	0910		
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	0920		
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	0930		
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)		0939		
80	Current cap on CET1 instruments subject to phase out arrangements	0940		
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	0950		
82	Current cap on AT1 instruments subject to phase out arrangements	0960		
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	0970		
84	Current cap on T2 instruments subject to phase out arrangements	0980		
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	0990		

EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited financial statements

PLN m

		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		As at period end	As at period end	
		a	b	c
		0010	0020	0030
Breakdown by asset classes according to the balance sheet in the published financial statements				
A.1	Cash and cash equivalents	4 063	4 058	Consolidated financial statements of the Alior Bank Spółka Akcyjna Capital Group for the year ended 31 December 2025 - note Consolidated statement of financial position (Assets)
A.2	Amounts due from banks	2 203	2 203	
A.3	Debt securities and derivatives	26 510	26 492	
A.3.1	measured at fair value through other comprehensive income	22 543	22 540	
A.3.2	measured at fair value through profit or loss	371	356	
A.3.3	measured at amortized cost	3 596	3596	
A.4	Derivative hedging instruments	660	660	
A.5	Loans and advances to customers	65 451	65 451	
A.6	Property, plant and equipment	829	829	
A.7	Intangible assets	551	551	
A.8	Investments in associates	0	75	
A.9	Income tax asset	724	723	
A.10	Other assets	784	780	
Total assets		101 775	101 822	
Breakdown by liability classes according to the balance sheet in the published financial statements				
P.1	Amounts due to banks	589	589	Consolidated financial statements of the Alior Bank Spółka Akcyjna Capital Group for the year ended 31 December 2025 - note Consolidated statement of financial position (Liabilities)
P.2	Amounts due to customers	82 621	82 679	
P.3	Financial liabilities	327	327	
P.4	Derivative hedging instruments	69	69	
P.5	Fair value changes of the hedged items in portfolio hedge of interest rate risk	202	202	
P.6	Provisions	404	404	
P.7	Other liabilities	2 040	2 033	
P.8	Income tax liabilities	218	217	
P.9	Zobowiązania z tytułu emisji dłużnych papierów wartościowych	2 322	2 322	
Total liabilities		88 792	88 842	
Shareholders' Equity				
P.10	Share capital	1 305	1 305	Consolidated financial statements of the Alior Bank Spółka Akcyjna Capital Group
P.11	Supplementary capital	8 655	8 649	
P.11.1	including Emission Agios	3 877	3 877	

		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		As at period end	As at period end	
		a	b	c
		0010	0020	0030
P.12	Revaluation reserve	408	408	for the year ended 31 December 2025 - note Consolidated statement of financial position (Equity)
P.13	Other reserves	162	174	
P.14	Retained earnings	2 453	636	
P.14.1	including Accumulated losses	86	78	
P.14.2	including Profit for the period	2 367		
P.14.3	including approval of the Polish Financial Supervision Authority to include the net result in TIER I		558	
	Total shareholders' equity	12 983	11 172	

The amount of deduction from own funds for the item Intangible assets, point 1 letter b) of the above table, was decreased by PLN 101.5 M. This adjustment represents the value of a carefully valued software intangible asset, which was determined by the Bank in accordance with Commission Delegated Regulation (EU) 2020/2176 of 12 November 2020 amending Delegated Regulation (EU) No 241/2014 with regard to the deduction of software assets from Common Equity Tier 1 items. The above adjustment was taken into account by the Bank in the calculation of capital requirements for credit risk.

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

		Series A shares	Series B shares	Series C, D shares	Series E, F shares	Series G, H shares	Series I, J shares	MREL series N bonds	MREL series O bonds	MREL series P bonds	MREL series R bonds	MREL series S bonds
1	Issuer	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA	Alior Bank SA
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	PLALIOR00045	PLALIOR00045	PLALIOR00045	PLALIOR00045	PLALIOR00045	PLALIOR00045	PLALIOR00268	PLALIOR00276	PLALIOR00284	PLALIOR00326	PLALIOR00367
2a	Public or private placement	public	public	public	public	public	public	public	public	public	public	public
3	Governing law(s) of the instrument	polish	polish	polish	polish	polish	polish	polish	polish	polish	polish	polish
3a	Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Recognition in regulatory capital

4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Eligible liability instruments	Eligible liability instruments	Eligible liability instruments	Eligible liability instruments	Eligible liability instruments
5	Post-transitional CRR rules	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Common Equity Tier I	Eligible liability instruments	Eligible liability instruments	Eligible liability instruments	Eligible liability instruments	Eligible liability instruments
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated	individual and consolidated
7	Instrument type (types to be specified by each jurisdiction)	ordinary shares, Article 28 CRR	ordinary shares, Article 28 CRR	ordinary shares, Article 28 CRR	ordinary shares, Article 28 CRR	ordinary shares, Article 28 CRR	ordinary shares, Article 28 CRR	Eligible liability instruments,	Eligible liability instruments,	Eligible liability instruments,	Eligible liability instruments,	Eligible liability instruments,
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	500	13	132	8	87	566	451	552	406	405	455
9	Nominal amount of instrument	10	10	10	10	10	10	450	550	400	400	450
EU-9a	Issue price	30	80	issue prices for individual tranches in the current report	65	73	39	500 000	500 000	500 000	500 000	500 000
EU-9b	Redemption price	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	500 000	500 000	500 000	500 000	500 000
10	Accounting classification	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Liability	Liability	Liability	Liability	Liability

		Series A shares	Series B shares	Series C, D shares	Series E, F shares	Series G, H shares	Series I, J shares	MREL series N bonds	MREL series O bonds	MREL series P bonds	MREL series R bonds	MREL series S bonds
11	Original date of issuance	21.04.2008	10.05.2012	23.07.2012 19.10.2012 12.09.2017 15.01.2018 29.03.2018 28.06.2018	29.03.2017 12.09.2017	28.11.2013 25.02.2015	25.05.2016 08.11.2016	20.12.2023	27.06.2024	14.11.2024	17.06.2025	30.10.2025
12	Perpetual or dated	perpetual	perpetual	perpetual	perpetual	perpetual	perpetual	dated	dated	dated	dated	dated
13	Original maturity date	No maturity date	No maturity date	No maturity date	No maturity date	No maturity date	No maturity date	15.06.2027	09.06.2028	14.04.2028	17.04.2029	19.10.2029
14	Issuer call subject to prior supervisory approval	No	No	No	No	No	No	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	15.06.2026 450 mln PLN	09.06.2027 550 mln PLN	14.04.2027 400 mln PLN	17.04.2028 400 mln PLN	19.10.2028 450 mln PLN
16	Subsequent call dates, if applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	every working day from 16.06.2026 to 14.06.2027	every working day from 10.06.2027 to 08.06.2028	every working day from 15.04.2027 to 13.04.2028	every working day from 18.04.028 to 16.04.2029	every working day from 20.10.2028 to 18.10.2029

Coupons / Dividends

17	Fixed or floating dividend/coupon	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
18	Coupon rate and any related index	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	WIBOR6M +2,81	WIBOR6M +1,99	WIBOR6M +2,07	WIBOR6M +1,95	WIBOR6M +1,50
19	Existence of a dividend stopper	No	No	No	No	No	No	No	No	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partial discretionary	Partial discretionary	Partial discretionary	Partial discretionary	Partial discretionary	Partial discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partial discretionary	Partial discretionary	Partial discretionary	Partial discretionary	Partial discretionary	Partial discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No	No	No	No
22	Noncumulative or cumulative	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
25	If convertible, fully or partially	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable

		Series A shares	Series B shares	Series C, D shares	Series E, F shares	Series G, H shares	Series I, J shares	MREL series N bonds	MREL series O bonds	MREL series P bonds	MREL series R bonds	MREL series S bonds	
26	If convertible, conversion rate	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
27	If convertible, mandatory or optional conversion	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
28	If convertible, specify instrument type convertible into	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
29	If convertible, specify issuer of instrument it converts into	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
30	Write-down features	No	No	No	No	No	No	No	No	No	No	No	
31	If write-down, write-down trigger(s)	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
32	f write-down, full or partial	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
33	If write-down, permanent or temporary	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
34	If temporary write-down, description of write-up mechanism	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
34a	Type of subordination (only for eligible liabilities)	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
EU-34b	Ranking of the instrument in normal insolvency proceedings	Category 10 Bankruptcy Law	Category 10 Bankruptcy Law	Category 10 Bankruptcy Law	Category 10 Bankruptcy Law	Category 10 Bankruptcy Law	Category 10 Bankruptcy Law	Category 6 Bankruptcy Law	Category 3 Bankruptcy Law	Category 6 Bankruptcy Law	Category 6 Bankruptcy Law	Category 3 Bankruptcy Law	
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	-	-	-	-	-	-	According to the position in the hierarchy of claims	According to the position in the hierarchy of claims	According to the position in the hierarchy of claims	According to the position in the hierarchy of claims	According to the position in the hierarchy of claims	
36	Non-compliant transitioned features	No	No	No	No	No	No	No	No	No	No	No	
37	If yes, specify non-compliant features	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.aliorbank.pl/en/investor-relations/current-reports.html						https://www.aliorbank.pl/en/investor-relations/bond-issues.html					

IFRS 9-FL – Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs

From January 1, 2023, the Bank did not increase Common Equity Tier 1 capital by the amount resulting from the transitional period to mitigate the impact of the introduction of IFRS 9. The increase amount was last used on December 31, 2022.

Temporary provisions set out in Art. 468 of the CRR Regulation the Bank applied until December 31, 2022 (the last possible date for the temporary treatment of unrealized profits and losses measured at fair value through other comprehensive income in connection with the COVID-19 pandemic).

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

PLN m

	a	b	c	d	e	f	g	h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)	
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
Breakdown by country:													
1	Poland	70 944	0			70 944	3 998	0		3 998	49 977	98.75%	1.00%
2	Great Britain	289				289	18			18	220	0.43%	2.00%
3	Cyprus	212				212	17			17	211	0.42%	1.00%
4	Luxembourg	88				88	6			6	72	0.14%	0.50%
5	Germany	63				63	3			3	29	0.06%	0.75%
6	Ireland	31				31	1			1	11	0.02%	1.50%
7	Netherlands	26				26	1			1	12	0.02%	2.00%
8	Switzerland	17				17	1			1	9	0.02%	0.00%
9	France	12				12	1			1	10	0.02%	1.00%
10	Belgium	11				11	0			0	4	0.01%	1.00%
11	Austria	8				8	0			0	2	0.00%	0.00%
12	Italy	5				5	0			0	3	0.01%	0.00%
13	United States	4				4	0			0	2	0.00%	0.00%
14	Spain	3				3	0			0	2	0.00%	0.50%
15	Estonia	3				3	0			0	2	0.00%	1.50%
16	Czech Republic	2				2	0			0	1	0.00%	1.25%
17	Sweden	1				1	0			0	1	0.00%	2.00%
18	Australia	1				1	0			0	1	0.00%	1.00%
19	Norway	1				1	0			0	1	0.00%	2.50%
20	Denmark	1				1	0			0	1	0.00%	2.50%
21	Canada	1				1	0			0	0	0.00%	0.00%
22	Finland	1				1	0			0	1	0.00%	0.00%
23	Portugal	1				1	0			0	0	0.00%	0.00%
24	Liberia	43				43	3			3	36	0.07%	
25	Other countries without CCyB	4				4	0			0	2	0.08%	
26	Total	71 772	0	0	0	71 772	4 049	0	0	4 049	50 610	100%	

EU CCyB2 – Amount of institution-specific countercyclical capital buffer

PLN m

			a
			0010
1	Total risk exposure amount	0010	59 643
2	Institution specific countercyclical capital buffer rate	0020	1.0027%
3	Institution specific countercyclical capital buffer requirement	0030	598

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

PLN m

			Applicable amount
			a
			0010
1	Total assets as per published financial statements	0010	101 775
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	0020	47
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	0030	
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	0040	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	0050	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	0060	
7	Adjustment for eligible cash pooling transactions	0070	
8	Adjustment for derivative financial instruments	0080	1 796
9	Adjustment for securities financing transactions (SFTs)	0090	
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	0100	8 236
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	0110	
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	0120	
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	0130	
12	Other adjustments	0140	-410
13	Total exposure measure	0150	111 444

EU LR2 – LRCom: Leverage ratio common disclosure

PLN m

			CRR leverage ratio exposures	
			31.12.2025	31.12.2024
			a	b
			0010	0020
On-balance sheet exposures (excluding derivatives and SFTs)				
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	0010	99 631	91 184
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	0020		
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	0030		
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	0040		
5	(General credit risk adjustments to on-balance sheet items)	0050		
6	(Asset amounts deducted in determining Tier 1 capital)	0060	-531	-495
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	0070	99 100	90 690
Derivative exposures				
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	0080	1 237	659
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	0090		
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	0100	1 130	761
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	0110		
EU-9b	Exposure determined under Original Exposure Method	0120		
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	0130		
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	0140		
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	0150		
11	Adjusted effective notional amount of written credit derivatives	0160		
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	0170		
13	Total derivatives exposures	0180	2 367	1 420
Securities financing transaction (SFT) exposures				
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	0190	1 741	1 526
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	0200		
16	Counterparty credit risk exposure for SFT assets	0210		
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	0220		
17	Agent transaction exposures	0230		
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	0240		
18	Total securities financing transaction exposures	0250	1 741	1 526

		CRR leverage ratio exposures		
		31.12.2025	31.12.2024	
		a	b	
		0010	0020	
Other off-balance sheet exposures				
19	Off-balance sheet exposures at gross notional amount	0260	17 123	12 641
20	(Adjustments for conversion to credit equivalent amounts)	0270	-8 887	-7 057
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)	0280		
22	Off-balance sheet exposures	0290	8 236	5 584
Excluded exposures				
EU-22a	(Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	0300		
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	0310		
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	0320		
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	0330		
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	0340		
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	0350		
EU-22g	(Excluded excess collateral deposited at triparty agents)	0360		
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	0370		
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	0380		
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	0390		
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	0400		
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	0410		
EU-22m	(Total exempted exposures)	0420		
Capital and total exposure measure				
23	Tier 1 capital	0430	10 515	9 742
24	Total exposure measure	0440	111 444	99 220
Leverage ratio				
25	Leverage ratio (%)	0450	9.44%	9.82%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	0460	9.44%	9.82%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	0470	9.44%	9.82%
26	Regulatory minimum leverage ratio requirement (%)	0480	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0490		
EU-26b	of which: to be made up of CET1 capital	0500		
27	Leverage ratio buffer requirement (%)	0510		
EU-27a	Overall leverage ratio requirement (%)	0520	3.00%	3.00%
Choice on transitional arrangements and relevant exposures				
EU-27b	Choice on transitional arrangements for the definition of the capital measure	0530		
Disclosure of mean values				
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	0540		
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	0550	1 741	1 526
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	0560	109 703	97 694

		CRR leverage ratio exposures		
		31.12.2025	31.12.2024	
		a	b	
		0010	0020	
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	0570	109 703	97 694
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	0580	9.59%	9.97%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	0590	9.59%	9.97%

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

PLN m

		CRR leverage ratio exposures	
		A	
		0010	
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	0010	99 631
EU-2	Trading book exposures	0020	59
EU-3	Banking book exposures, of which:	0030	99 572
EU-4	Covered bonds	0040	
EU-5	Exposures treated as sovereigns	0050	29 090
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	0060	1
EU-7	Institutions	0070	2 176
EU-8	Secured by mortgages of immovable properties	0080	29 492
EU-9	Retail exposures	0090	28 686
EU-10	Corporates	0100	5 018
EU-11	Exposures in default	0110	2 241
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	0120	2 868

EU LRA – Disclosure of LR qualitative information

Legal basis	Row number	Details
Point (d) of Article 451(1) CRR	a)	<p>In its operations, the Bank applies procedures for managing the risk of excessive financial leverage. These procedures define:</p> <ul style="list-style-type: none"> the method of measuring the leverage ratio as a measure of Tier 1 capital divided by the total exposure, frequency of calculating the leverage ratio, responsibility for calculating the leverage ratio, limits for the risk of excessive financial leverage, responsibility for managing the risk of excessive leverage. <p>The Bank periodically monitors and reports its financial leverage ratio. The leverage ratio is forecasted in the financial planning process and takes into account planned changes in the asset and capital structure.</p>
Point (e) of Article 451(1)	b)	<p>The leverage ratio is at a safe level. The value of the leverage ratio was influenced by total exposure and Tier 1 capital.</p>

EU LIQA – Liquidity risk management

Legal basis	Row number	Details
Article 451a(4) CRR	a)	<p>Liquidity risk is understood by the Group as the risk of inability to meet payment obligations arising from balance sheet and off-balance sheet items held by the Group on terms favorable to the Group and at a reasonable price.</p> <p>As part of the liquidity risk, the financing risk is distinguished, which is the risk of losing the financing sources and the risk of the lack of the required renewed funding or access denial to new sources of financing.</p> <p>Strategies and processes for liquidity risk management, including policies for diversifying the sources and maturity of planned funding</p> <p>Liquidity risk management in the Group consists in ensuring and maintaining the Group's ability to meet both current and future liabilities, while minimizing the costs of obtaining liquidity. The Group has a liquidity adequacy assessment process (ILAAP) which comprehensively assesses the adequacy of liquidity risk management and its adjustment to the nature, scale and complexity of the Alior Bank S.A. Capital Group.</p> <p>This process accomplishes the following goals:</p> <ul style="list-style-type: none"> ensuring its ability to pay all its obligations when they fall due also in an extreme situation (including taking into account regulatory restrictions on the transfer of liquidity within the Group's entities), maintaining at an appropriate level of liquid assets, i.e., a buffer of unencumbered high-quality liquid assets to ensure adequate excess liquidity, in case of a sudden deterioration in the liquidity situation, determine the scale of liquidity risk taken by the Group, by establishing internal liquidity limits, a stress survival horizon consistent with the appetite and strategy, taking into account the results of stress tests, minimising the risk of trespassing on the liquidity limits defined at the Group,

Legal basis	Row number	Details
		<ul style="list-style-type: none"> • monitoring the Group's liquidity condition regarding the occurrence of an emergency situation in order to launch the Liquidity Maintenance Plan and the Recovery Plan, • ensuring compliance of the processes functioning at the Group with regulatory requirements concerning liquidity risk management. <p>The above objectives, are carried out independently by relevant organizational units, whose competences and responsibilities are clearly defined in internal regulations.</p> <p>As part of ILAAP Bank:</p> <ul style="list-style-type: none"> • identifies risks and significant risk factors, • measures and reports liquidity risk, • manages Liquidity Contingency Plans and Recovery Plan, • maintains a liquidity buffer consisting of high-quality liquid assets, • develops a system of liquidity limits in line with the risk appetite, monitors liquidity limits and early warning indicators identifying negative trends that may have an impact on the increase of liquidity risk, • periodically conducts (in the form of reports) analyses of categories and factors affecting current and future liquidity levels, • conducts liquidity risk stress tests, on the basis of which it assesses the extent to which the Group is prepared to settle liabilities in a stress situation, • includes in the fund transfer rates system adjustments supporting liquidity risk management, • develops liquidity procedures and policies, including a financing plan for the next years of the Group's operations. The developed financing plan takes into account, among others, the scope of obtaining loans and deposits on the interbank market, taking into account their term and currency structure, the Group's plans to obtain and maintain stable external funds, the availability of refinancing instruments and an appropriate degree of diversification of the Group's liabilities.
<p>Article 451a(4) CRR</p>	<p>b)</p>	<p>The structure and organization of the liquidity risk management function (body, articles of association, other arrangements)</p> <p>For the purposes of asset and liability management, the Capital, Assets and Liabilities Management Committee (CALCO) was established. The liquidity risk strategy, including the acceptable risk level, the assumed balance sheet structure and the financing plan, is approved by the Bank's Management Board and then accepted by the Bank's Supervisory Board. The Treasury Department is responsible for concluding interbank transactions, settlement and accounting of transactions takes place in the Operations and Settlements Division, while monitoring and measurement of liquidity risk takes place in the Financial Risk Management Department. The division of competences in the field of liquidity risk management is clear and ensures separation down to the level of a Management Board Member, which guarantees full independence of their activities.</p>
<p>Article 451a(4) CRR</p>	<p>c)</p>	<p>Description of the degree of centralization of liquidity management and interactions between group entities</p> <p>In 2025, in accordance with the provisions contained in internal regulations regarding liquidity risk, the Bank had one company significant from the point of view of managing the Group's liquidity risk, which was the subsidiary Alior Leasing Sp. z o.o. Liquidity risk in the company is monitored, controlled and reported. Alior Leasing has internal liquidity risk management rules, which it developed in consultation with Alior Bank, according to which, among others: determines the appetite for liquidity risk, liquidity contingency plans and prepares periodic reports. Reports on liquidity risk in the company prepared by Alior Leasing constitute, in particular, a starting point for making decisions regarding the company's liquidity risk management and serve to consolidate liquidity risk at the level of the Alior Bank S.A. Capital Group.</p>

Legal basis	Row number	Details
Article 451a(4) CRR	d)	<p data-bbox="478 280 1173 313">Scope and nature of liquidity risk reporting and measurement systems</p> <p data-bbox="478 347 1436 638">The measurement of liquidity risk at the Bank is performed by the Financial Risk Management Department in a manner completely independent of the units responsible for concluding transactions. The purpose of risk measurement is to present the impact of all significant factors on the Group's ability to maintain an adequate level of liquidity. Apart from the collective measures of liquidity risk, the analysis covers also particular categories and factors influencing the current or potential future liquidity level of the Group. The measurement of the liquidity risk covers the Polish currency and all foreign currencies significant from the point of view of the liquidity risk in which the Group conducts its operating activities are performed taking into account all material items, both on-balance and off-balance sheet (including in particular derivative instruments).</p> <p data-bbox="478 683 1436 750">Among the liquidity management measures used, the Group distinguishes between ratios and related limits of the following types of liquidity:</p> <ul data-bbox="518 750 1436 1086" style="list-style-type: none"> • intraday liquidity, defined as the ability to meet all monetary obligations on the current day, • current liquidity understood as the ability to finance assets and settle liabilities in a timely manner in the course of the Bank's normal operations or in other conditions that can be predicted without the necessity to incur a loss within the next 7 days, • short-term liquidity, defined as the ability to meet all monetary obligations within 30 consecutive days, • medium-term liquidity is understood as the ability to meet all liabilities with maturity over 1 and up to 12 months, • long-term liquidity is the monitoring of the ability to meet all monetary obligations with maturity over 12 months. <p data-bbox="478 1120 1436 1377">The management of the intraday, current and short-term liquidity risk covers events that will affect the Bank's liquidity in the period from 1 day to 1 month. The Interbank Transactions Department is responsible for the management of intraday, current and short-term liquidity, and the Financial Risk Management Department, using daily reports, supervises and monitors the management process. The Financial Risk Management Department is responsible for the control and monitoring of medium and long-term liquidity, which prepares monthly reports discussed at CALCO Committee meetings, presented to the Bank's Management Board and quarterly reports presented to the Supervisory Board.</p> <p data-bbox="478 1422 1436 1478">The Alior Bank S.A. Group uses a number of indicators and analyses to measure and analyze the liquidity risk, including:</p> <ul data-bbox="518 1489 1436 1814" style="list-style-type: none"> • calculation and monitoring of LCR, NSFR supervisory indicators - assessment of the Group's compliance with quantitative supervisory requirements, • forecasts for the development of supervisory liquidity measures - ensuring that the Group's will meet quantitative supervisory requirements in the future, • calculation and monitoring of internal liquidity ratios, including measures of intraday, current, short-term, medium and longterm liquidity, basic surplus and total liquidity buffer, • liquidity gap - allows to estimate the size of the mismatch (difference) between on-balance sheet and off-balance sheet assets and liabilities for each maturity / maturity band (period gap), as well as for the sum of assets and liabilities jointly in all maturity / maturity bands (cumulative gap). <p data-bbox="478 1825 1436 1971">The Group determines the contractual and realized liquidity gap. The realignment of flows takes place as a result of applying adjustment weights to contractual flows in order to determine the most probable (economic) maturity date. Realization of values and dates is used both for balance sheet items and off-balance sheet items, e.g. such as: assets for which earlier disposal is possible, positions without contractual maturities, banking products where the analysis of customer trends and behavior</p>

Legal basis	Row number	Details
		<p>indicates differences between the contractual maturity and the actual maturity, off-balance sheet liabilities due to credit lines granted and warranty.</p> <ul style="list-style-type: none"> • stability analysis of stable external funds - determining on the basis of historical data what part of these liabilities is stable and may, with a high probability, constitute a stable source of financing under normal market conditions, • analysis of renewal / breaking of deposits - the purpose is to verify the behavioral stability of customer behavior, which is the basis for determining the sediment and weights of cash flow realities in the Group, • analysis of the concentration of stable external funds - an indication of the potential risk of the Group's overdependence on sources of funding characterized by too low a degree of diversification, which could have a negative impact on the stability of foreign funds, • analysis of the stability of receivables due to off-balance sheet commitments granted - determination of the level of use of guarantee and credit lines by customers, • long-term liquidity analysis - aimed at determining the risk associated with financing long-term loans (mainly secured by a mortgage or for financing large projects not related to real estate, including industrial investments) with liabilities with shorter maturities, • analysis of the concentration of liquid assets - aimed at limiting the risk of obtaining cash by liquidating the above-mentioned assets when it is necessary to cover the expected as well as unexpected liabilities of the Bank.
<p>Article 451a(4) CRR</p>	<p>e)</p>	<p>Policies for hedging and limiting liquidity risk, as well as strategies and processes for monitoring the continued effectiveness of hedging instruments and risk mitigants</p> <p>The Group's liquidity risk hedging strategy consists in:</p> <ul style="list-style-type: none"> • shaping an appropriate structure of financing sources, • limiting the concentration risk by diversifying the structure of the deposit base broken down into retail, business, financial, • maintaining excess liquidity at an adequate level in the form of the most liquid securities, • increasing the availability of alternative sources of financing. <p>The Alior Bank Group regularly monitors and reports the level of liquidity risk measures and the degree of utilization of internal limits and threshold values. Liquidity risk reports are prepared on a daily, weekly, monthly, quarterly and annual basis. Their frequency and scope as well as the list of recipients (including CALCO, the Bank's Management Board and the Supervisory Board) are regulated in the internal regulations of the Group.</p> <p>The limits set the boundaries of the Group's operations that must not be exceeded. The Group extends the selected limits by warning thresholds, the function of which is to protect against exceeding internal limits by specifying the level of limit utilization (minimum surplus), the achievement of which will mean an increased liquidity risk and a real risk of exceeding the limit within a specified period of time.</p>
<p>Article 451a(4) CRR</p>	<p>f)</p>	<p>Outline of the Bank's contingency financing plans</p> <p>In the event of a liquidity crisis, understood as a hypothetical risk and the real occurrence of a situation in which it will not be possible to timely meet current or anticipated future payment obligations, liquidity contingency plans have been developed to identify solutions to survive the liquidity crisis, including corrective actions. The liquidity situation is monitored on an ongoing basis in terms of identifying a threat situation by defining and monitoring a wide range of indications regarding the situation within the Group, as well as the market and macroeconomic environment, which are used to identify situations of increased liquidity risk, high liquidity risk and liquidity risk crisis and enable taking appropriate action, as specified in the contingency plans. Contingency plans are reviewed and tested at least once a year or when changes in market conditions so require. As part of the tests of contingency plans, the following are determined: the feasibility and feasibility of actions, the</p>

Legal basis	Row number	Details
		<p>decision-making process, the competences of individual units, the amount of funds that can be obtained and the time necessary to implement the actions.</p>
<p>Article 451a(4) CRR</p>	<p>g)</p>	<p>Clarification of how to apply stress tests</p> <p>Stress testing is an essential component of liquidity risk management. The core part of stress testing is scenario analysis, which examines the impact on the liquidity of a given scenario taking into account different risk factors and different levels of severity of individual risk factors (while maintaining the overarching principle of a conservative approach in constructing scenarios). Additionally, separate scenarios for intraday liquidity are carried out. The scenario tests are supplemented with sensitivity analyzes, where only selected risk factors are tested which, in the Group's opinion, have the greatest impact on the liquidity situation, and reverse tests, where it is tested what level of the most important risk factors leads to the loss of liquidity. Reverse tests are performed by analyzing two aspects: loss of liquidity meaning the inability to settle liabilities and a decrease in liquidity resulting in a failure to meet supervisory liquidity requirements. The results of the stress tests are accepted by the Supervisory Board.</p> <p>The stress test scenarios, which are adopted by the Bank's Management Board, are developed in three basic variants, for which at least two scenarios are constructed:</p> <ul style="list-style-type: none"> • internal crisis - a situation in which intra-bank factors or other factors, but only affecting the Bank, are responsible for liquidity problems (2 scenarios assuming loss of reputation), • systemic crisis - a situation in which there are problems with maintaining liquidity in the entire or a significant part of the banking system due to the economic or financial crisis (2 scenarios, including 1 related to a geopolitical crisis and 1 related to a geopolitical and fiscal crisis), • a combination of an internal crisis and a systemic crisis - a situation that is a combination of elements from the two above variants (2 scenarios assuming simultaneous problems of the Bank and the entire sector). <p>The results of the stress tests are used in particular to assess the preparedness to settle liabilities in a stress situation, to assess the adequacy of excess liquidity by comparing the held liquidity buffer with the required liquidity buffer in a stress situation and to verify the adjustment of the Group's liquidity profile to the adopted liquidity risk tolerance by checking, whether the survival horizon in each scenario is at least equal to the originally assumed one. The comparison of the demand for liquid funds for each scenario with the values that can be obtained on the basis of the tests of contingency plans allows to check whether the Group is able to settle liabilities in longer horizons (beyond the survival horizon) using emergency actions. In addition, the results of stress tests are used to set internal limits, adjust and improve internal regulations, everyday practice of liquidity risk management by using the results of stress tests for the ongoing assessment of the liquidity situation, shaping the liquidity contingency plan.</p>
<p>Article 451a(4) CRR</p>	<p>h)</p>	<p>Information provided in this Report in the STATEMENT section.</p>
<p>Article 451a(4) CRR</p>	<p>i)</p>	<p>Information provided in this Report in the STATEMENT section.</p>

Recommendation P – regarding the management of banks' financial liquidity risk

Legal basis	Details
Recommendation P	<p data-bbox="384 327 1430 584">In accordance with the guidelines set out in Recommendation P, the Bank maintains a high level of liquidity buffer consisting of unencumbered, high-quality liquid assets, investing in debt securities of government and enterprises with the highest ratings, characterized by the possibility of quick liquidation, maintaining funds on a current account with the National Bank of Poland and other banks (nostro accounts), maintaining funds in the Bank's cash registers and investing funds in interbank deposits, within the established limits. The adequacy of the maintained level of the liquidity buffer is controlled by comparing it with the designated minimum amount of the liquidity buffer necessary to survive the stress scenario in the time horizon up to 7 days and 30 days.</p> <p data-bbox="384 622 1430 748">As at December 31, 2025, the total liquidity buffer amounted to PLN 27,453 million compared to the minimum level of PLN 11,723 million resulting from the shock scenario. When calculating the amount of the liquidity buffer, the Bank applies appropriate reductions to the individual components of this buffer in order to take into account the market (product) liquidity risk.</p> <p data-bbox="384 790 1430 848">The Bank uses a number of methods to assess the liquidity situation, including: monitoring (values in brackets at the end of 2025):</p> <ul data-bbox="432 860 1142 949" style="list-style-type: none">• the ratio of the deposit base and own issues to net loans (1.32%),• stability of the deposit base (95.1%), including deposit breaks (0.7%),• on-balance sheet and off-balance sheet liquidity gaps. <p data-bbox="384 992 1430 1050">The Bank conducts a gap analysis based on realistic cash flows, taking into account, among others, the following assumptions:</p> <ul data-bbox="432 1061 1430 1184" style="list-style-type: none">• stability of liabilities with indefinite maturities (e.g. current accounts, deposit renewals),• possibility of extending the maturity of certain asset items (e.g. not taking into account proceeds from non-performing loans),• possibility of selling asset items (liquidity portfolio). <p data-bbox="384 1227 1430 1314">Moreover, when determining the actual liquidity gap, the Bank uses model weights for deposits and the use of granted off-balance sheet liabilities, determined on the basis of the implemented statistical model and historical observations of balances for individual products.</p>

Analysis of maturity / payment of assets and liabilities for the Alior Bank Group, according to contractual deadlines at the end of 2025

PLN m

31.12.2025	1D	1M	3M	6M	1Y	2Y	5Y	5Y+	RAZEM
ASSETS	4 257	5 061	3 325	3 442	6 665	11 693	31 039	36 293	101 775
Cash & Nostro	4 063	0	0	0	0	0	0	0	4 063
Amounts due from banks	13	1 326	41	0	0	0	0	823	2 203
Securities	0	1 948	618	123	1 212	3 304	16 765	2 274	26 244
Loans and advances to customers	181	1 746	2 592	3 291	5 422	8 174	14 063	29 973	65 442
Other assets	0	41	74	28	31	215	211	3 223	3 823
LIABILITIES AND EQUITY	-64 688	-6 903	-8 577	-3 806	-1 385	-714	-2 099	-13 603	-101 775
Amounts due to banks	-589	-59	0	0	0	0	0	0	-648
Amounts due to customers	-62 205	-6 809	-8 531	-3 748	-1 306	-60	-8	-2	-82 669
Own issues	0	0	0	0	0	-504	-1 818	0	-2 322
Equity	0	0	0	0	0	0	0	-12 983	-12 983
Other liabilities	-1 894	-35	-46	-58	-79	-150	-273	-618	-3 153
Balance sheet gap	-60 431	-1 842	-5 252	-364	5 280	10 979	28 940	22 690	0
Cumulated balance sheet gap	-60 431	-62 273	-67 525	-67 889	-62 609	-51 630	-22 690	0	
Derivative instruments – inflows	4	5 157	1 689	736	615	545	1 001	354	10 101
Derivative instruments – outflows	-12	-5 163	-1 724	-703	-489	-433	-952	-328	-9 804
Derivative instruments – net	-8	-6	-35	33	126	112	49	26	297
Guarantee and financing lines	-14 510	0	0	0	0	0	0	0	-14 510
Off-balance sheet gap	-14 518	-6	-35	33	126	112	49	26	-14 213
Total gap	-74 949	-1 848	-5 287	-331	5 406	11 091	28 989	22 716	-14 213
Total cumulated gap	-74 949	-76 797	-82 084	-82 415	-77 009	-65 918	-36 929	-14 213	

Analysis of maturity / payment of assets and liabilities for the Alior Bank Group, according to the dates real to the end of 2025

PLN m

31.12.2025	1D	1M	3M	6M	1Y	2Y	5Y	5Y+	RAZEM
ASSETS	8 925	21 351	2 550	3 192	5 309	8 016	13 855	38 577	101 775
Cash & Nostro	1 257	0	0	0	0	0	0	2 806	4 063
Amounts due from banks	13	1 326	41	0	0	0	0	823	2 203
Securities	7 475	18 301	0	0	0	0	265	203	26 244
Loans and advances to customers	180	1 683	2 435	3 164	5 278	7 801	13 379	31 522	65 442
Other assets	0	41	74	28	31	215	211	3 223	3 823
LIABILITIES AND EQUITY	-3 744	-3 907	-4 426	-2 162	-3 052	-4 541	-9 194	-70 749	-101 775
Amounts due to banks	-589	-59	0	0	0	0	0	0	-648
Amounts due to customers	-1 261	-3 804	-4 362	-2 076	-2 916	-3 887	-7 103	-57 260	-82 669
Own issues	0	0	0	0	0	-504	-1 818	0	-2 322
Equity	0	-9	-18	-28	-57	0	0	-12 871	-12 983
Other liabilities	-1 894	-35	-46	-58	-79	-150	-273	-618	-3 153
Balance sheet gap	5 181	17 444	-1 876	1 030	2 257	3 475	4 661	-32 172	0
Cumulated balance sheet gap	5 181	22 625	20 749	21 779	24 036	27 511	32 172	0	
Derivative instruments – inflows	4	5 157	1 689	736	615	545	1 001	354	10 101
Derivative instruments – outflows	-12	-5 163	-1 724	-703	-489	-433	-952	-328	-9 804
Derivative instruments – net	-8	-6	-35	33	126	112	49	26	297
Guarantee and financing lines	0	-924	-676	-663	-937	355	1 066	1 779	0
Off-balance sheet gap	-8	-930	-711	-630	-811	467	1 115	1 805	297
Total gap	5 173	16 514	-2 587	400	1 446	3 942	5 776	-30 367	297
Total cumulated gap	5 173	21 687	19 100	19 500	20 946	24 888	30 664	297	

EU LIQ1 – Quantitative information of LCR

PLN m			Total unweighted value (average)				Total weighted value (average)			
			a	b	c	d	e	f	g	h
EU 1a	Quarter ending on (DD Month YYYY)	0010	0010	0020	0030	0040	0050	0060	0070	0080
EU 1b	Number of data points used in the calculation of averages	0020	31.12.2025	30.09.2025	30.06.2025	31.03.2025	31.12.2025	30.09.2025	30.06.2025	31.03.2025
			12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS		0029								
1	Total high-quality liquid assets (HQLA)	0030					26 192	25 251	24 173	23 191
CASH - OUTFLOWS		0039								
2	Retail deposits and deposits from small business customers, of which:	0040	62 704	61 818	60 727	59 842	3 905	3 855	3 818	3 781
3	Stable deposits	0050	31 877	31 146	30 237	29 380	1 594	1 554	1 512	1 469
4	Less stable deposits	0060	22 079	22 015	22 079	22 146	2 311	2 302	2 306	2 312
5	Unsecured wholesale funding	0070	16 535	16 397	16 143	16 171	6 465	6 493	6 495	6 568
6	Operational deposits (all counterparties) and deposits in networks of cooperative	0080	1 751	1 450	1 049	721	298	233	173	114
7	Non-operational deposits (all counterparties)	0090	14 784	14 932	15 028	15 383	6 167	6 246	6 256	6 387
8	Unsecured debt	0100	0	15	66	67	0	14	66	67
9	Secured wholesale funding	0110					0	0	0	0
10	Additional requirements	0120	12 785	12 712	12 546	12 523	2 004	1 967	1 953	1 899
11	Outflows related to derivative exposures and other collateral requirements	0130	856	821	735	667	856	787	735	667
12	Outflows related to loss of funding on debt products	0140	0	0	0	0	0	0	0	0
13	Credit and liquidity facilities	0150	11 929	11 891	11 811	11 856	1 148	1 180	1 218	1 232
14	Other contractual funding obligations	0160	1 099	1 251	1 512	1 678	926	1 144	1 339	1 503
15	Other contingent funding obligations	0170	2 122	1 880	1 587	1 391	106	92	79	70
16	TOTAL CASH OUTFLOWS	0180					13 406	13 551	13 684	13 821
CASH - INFLOWS		0199								
17	Secured lending (e.g. reverse repos)	0190	2 201	2 015	1 999	2 037	0	0	0	0
18	Inflows from fully performing exposures	0200	2 102	2 279	2 553	2 593	1 588	1 723	2 053	2 091
19	Other cash inflows	0210	42	40	35	32	35	32	28	25
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)	0220					0	0	0	0
EU-19b	(Excess inflows from a related specialised credit institution)	0230					0	0	0	0
20	TOTAL CASH INFLOWS	0240	4 345	4 334	4 587	4 662	1 623	1 755	2 081	2 116
EU-20a	Fully exempt inflows	0250	0	0	0	0	0	0	0	0
EU-20b	Inflows subject to 90% cap	0260	0	0	0	0	0	0	0	0
EU-20c	Inflows subject to 75% cap	0270	4 345	4 334	4 587	4 662	1 623	1 755	2 081	2 116
TOTAL ADJUSTED VALUE		0279								
EU-21	LIQUIDITY BUFFER	0280					26 192	25 251	24 173	23 191
22	TOTAL NET CASH OUTFLOWS	0290					11 783	11 796	11 603	11 705
23	LIQUIDITY COVERAGE RATIO	0300					222%	214%	208%	198%

EU LIQB on qualitative information on LCR, which complements template EU LIQ1

Legal basis	Row number	Details
Article 451a(2) CRR	a)	<p>Explanation of the main factors affecting the LCR results and changes in the share of input data in the LCR calculation over time.</p> <p>The LCR is understood as the ratio of the value of liquid assets to net cash outflows resulting from both contractual and stress-modeled exposures over a 30-day time horizon.</p> <p>The main factors influencing the level of the LCR ratio are: safe level of maintained liquid assets, stable base of retail deposits, low dependence on short-term financing with deposits of financial entities, the level of issued bonds, taking into account their maturity, the balance of loans granted and the amount of lending conducted by the Group, and the amount of granted off-balance sheet liabilities (especially for financial entities).</p>
Article 451a(2) CRR	b)	<p>Explanation of changes in the LCR over time</p> <p>Throughout 2025, the LCR ratio was at a safe and high level, well above supervisory limits and internal limits resulting from the adopted risk appetite. As of December 31, 2025, the LCR ratio was 245% and was 43 percentage points higher than the ratio value as of December 31, 2024, which was 202%. The increase in the LCR ratio was, in particular, influenced by the increase in the Bank's deposit base from non-financial customers, exceeding the increase in loans in this period, obtaining funds under the MREL issue in the amount of approximately PLN 0.5 billion, and CSA deposits received on the market increased by PLN 0.5 billion. The main factor mitigating the increase in the LCR ratio was the increase in off-balance sheet items.</p>
Article 451a(2) CRR	c)	<p>Explanations on the actual concentration of funding sources</p> <p>The Group's financing sources include primarily a diversified deposit base, which includes current accounts and term deposits of retail customers (including individual customers and SMEs), financial customers and corporate customers. The deposit base is dominated by current accounts and term deposits of retail customers (approximately PLN 65.1 billion), which are characterized by a high level of stability and due to the weight assigned to outflows in the calculation of the LCR measure, they constitute a favorable source of financing (the average weight of outflows is 6.4 %). Deposits from corporate clients amount to approximately PLN 15.8 billion, with an average outflow weight of 33.3%, while deposits from financial clients amount to PLN 1.3 billion with a pre-assigned weight of 100%.</p> <p>The Group's other sources of financing include equity, which amount to approximately PLN 13.0 billion, and MREL bonds issued, which amount to PLN 2.3 billion.</p> <p>The Group conducts a monthly analysis of the concentration of the deposit base, which aims to indicate the potential risk of excessive dependence of the Group on financing sources characterized by too low a degree of diversification. In order to estimate the level of concentration, the Group determines the HCI indicator (High Concentration Indicator), calculated as the ratio of the value of funds accumulated by the largest depositories to the value of the deposit base. As of December 31, 2025, HCI was 0.7%, indicating a lack of concentration.</p> <p>In the following years, the Group assumes a moderate increase in the balance sheet total and maintaining customer deposits as the main source of financing (especially from individual customers).</p>
Article 451a(2) CRR	d)	<p>General description of the institution's liquidity buffer structure</p> <p>In order to protect itself against loss of liquidity, the Group maintains unencumbered liquid assets at an appropriate and high level, which are characterized primarily by a low level of credit and market risk and are relatively easy to value and sell. At the end of 2025, the Group's liquid assets amounted to PLN 28.149 million.</p>

Legal basis	Row number	Details
		<p>The Group's liquid assets include primarily:</p> <ul style="list-style-type: none"> • securities issued or guaranteed Polish government, EU governments, and the US (89.4%), including securities obtained through reverse repo transactions, • exposures to Central Banks (4.4%), including money bills and the surplus of funds accumulated on nostro accounts over the declared amount of required reserves, • other securities classified as liquid assets, including bonds issued by the European Investment Bank and Bank Gospodarstwa Krajowego (4.4%). • cash in hand (1.8%).
<p>Article 451a(2) CRR</p>	<p>e)</p>	<p>Derivatives exposures and potential collateral calls</p> <p>Outflows from derivative instruments include cash flows determined in the net amount for all derivative instruments for a given customer constituting a liability, the value of the surplus of security deposits placed by customers over the valuation of hedged transactions and additional outflows due to the impact of the scenario of unfavorable market conditions on transactions on derivative instruments (HLBA), calculated as the largest absolute 30-day net collateral flow realized in the last 2 years.</p> <p>As at December 31, 2025, the Group did not identify any contractual clauses regarding the deterioration of Alior Bank S.A. rating, which would result in the need to supplement the security deposit.</p>
<p>Article 451a(2) CRR</p>	<p>f)</p>	<p>Currency mismatch in the liquidity coverage ratio</p> <p>The Group monitors the LCR calculated for significant currencies, i.e. currencies for which the value of liabilities in a given currency exceeds 5% of the value of all liabilities. As at December 31, 2025, the Group's significant currencies included PLN, EUR and USD.</p> <p>When calculating the LCR for significant currencies, derivative exposures and potential margin calls are taken into account. The Group limits currency mismatches, among others: by investing in liquid securities in foreign currencies and establishing internal limits for the minimum allowable value of the indicator.</p>
<p>Article 451a(2) CRR</p>	<p>g)</p>	<p>The Bank has no other items in the LCR calculation that are not included in the LCR disclosure formula and that are considered by the institution to be material to its liquidity profile.</p>

EU LIQ2 – Net Stable Funding Ratio

Disclosure period - 31.12.2025

PLN m

			Unweighted value by residual maturity				Weighted value
			No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
			a	b	c	d	
			0010	0020	0030	0040	
Available stable funding (ASF) Items		0009					
1	Capital items and instruments	0010	11 173				11 173
2	Own funds	0020	11 173				11 173
3	Other capital instruments	0030					
4	Retail deposits	0040		64 572	548	64	60 606
5	Stable deposits	0050		38 452	238	3	36 759
6	Less stable deposits	0060		26 120	310	61	23 847
7	Wholesale funding:	0070		17 457	70	2 296	10 388
8	Operational deposits	0080		2 366			1 183
9	Other wholesale funding	0090		15 091	70	2 296	9 205
10	Interdependent liabilities	0100					
11	Other liabilities:	0110		4 319		403	403
12	NSFR derivative liabilities	0120					
13	All other liabilities and capital instruments not included in the above categories	0130		4 319		403	403
14	Total available stable funding (ASF)	0140					82 570
Required stable funding (RSF) Items		0149					
15	Total high-quality liquid assets (HQLA)	0150					267
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool	0160					
16	Deposits held at other financial institutions for operational purposes	0170					
17	Performing loans and securities:	0180		7 999	5 318	50 709	48 143
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut	0190					
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions	0200		871	52	222	335
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:	0210		6 341	4 967	33 266	33 930

			Unweighted value by residual maturity				Weighted value
			No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
			a	b	c	d	
			0010	0020	0030	0040	
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0220					
22	Performing residential mortgages, of which:	0230		327	276	16 997	13 601
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0240		150	133	5 738	3 872
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products	0250		460	23	224	277
25	Interdependent assets	0260					
26	Other assets:	0270		3 805	88	5 267	6 175
27	Physical traded commodities	0280					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs	0290				749	637
29	NSFR derivative assets	0300		613			613
30	NSFR derivative liabilities before deduction of variation margin posted	0310		62			3
31	All other assets not included in the above categories	0320		3 130	88	4 518	4 922
32	Off-balance sheet items	0330				14 510	888
33	Total RSF	0340					55 473
34	Net Stable Funding Ratio (%)	0350					149%

Disclosure period - 30.06.2025

PLN m

			Unweighted value by residual maturity				Weighted value
			No maturity	< 6 months	No maturity	≥ 1 rok	
			a	b	c	d	e
			0010	0020	0030	0040	0050
Available stable funding (ASF) Items		0009					
1	Capital items and instruments	0010	10 930				10 930
2	Own funds	0020	10 930				10 930
3	Other capital instruments	0030					
4	Retail deposits	0040		60 643	1 356	82	57 694
5	Stable deposits	0050		35 627	645	9	34 467
6	Less stable deposits	0060		25 016	711	73	23 227
7	Wholesale funding:	0070		19 603	72	1 811	9 965
8	Operational deposits	0080		2 131			1 066
9	Other wholesale funding	0090		17 472	72	1 811	8 899
10	Interdependent liabilities	0100					
11	Other liabilities:	0110	350	3 958		354	354
12	NSFR derivative liabilities	0120	350				
13	All other liabilities and capital instruments not included in the above categories	0130		3 958		354	354
14	Total available stable funding (ASF)	0140					78 943
Required stable funding (RSF) Items		0149					
15	Total high-quality liquid assets (HQLA)	0150					228
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool	0160					
16	Deposits held at other financial institutions for operational purposes	0170					
17	Performing loans and securities:	0180		9 653	5 519	49 162	47 445
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut	0190					
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions	0200		2 654	46	241	529
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:	0210		6 242	5 203	32 556	33 395
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0220					
22	Performing residential mortgages, of which:	0230		296	252	16 167	13 272

			Unweighted value by residual maturity				Weighted value
			No maturity	< 6 months	No maturity	≥ 1 rok	
			a	b	c	d	e
			0010	0020	0030	0040	0050
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0240		109	99	3 716	2 519
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products	0250		461	18	198	249
25	Interdependent assets	0260					
26	Other assets:	0270		3 630	216	4 630	5 092
27	Physical traded commodities	0280					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs	0290				588	499
29	NSFR derivative assets	0300					
30	NSFR derivative liabilities before deduction of variation margin posted	0310		685			34
31	All other assets not included in the above categories	0320		2 945	216	4 042	4 559
32	Off-balance sheet items	0330				13 765	820
33	Total RSF	0340					53 585
34	Net Stable Funding Ratio (%)	0350					147%

EU CRA – General qualitative information about credit risk

Legal basis	Row number	Details
Point (f) of Article 435(1) CRR	a)	<p>Alior Bank SA is a universal deposit and credit bank, servicing natural and legal persons and other entities that are domestic and foreign persons. The main activities of the Bank include maintaining bank accounts, granting loans and cash loans, issuing bank securities and purchasing and selling foreign currency values. The Bank also conducts brokerage activities, advisory and financial intermediation as well as provides other financial services.</p> <p>The risk profile depends on the type of business and results from:</p> <ul style="list-style-type: none"> the type of risk exposure, ie the types of risk to which the Bank is exposed in a specific type of activity, and the risk appetite adopted by the Bank, ie the maximum level of risk that the Bank is ready to take in its operations. <p>The risk appetite parameters are closely related to the Bank's strategy, and the strategy update is carried out together with the update of the financial plan, strategy and risk appetite, planned risk profiles of individual portfolios and their shares in the Bank's balance sheet.</p> <p>When developing its plans, the Bank adopts risk appetite targets such as CoR, NPL and NPE ratios, and coverage ratios, ensuring the achievement of business goals.</p> <p>In the longer term, the Bank builds a risk profile by ensuring acceptance criteria for new sales, as well as exposure handling and collection processes consistent with the Bank's medium- and long-term strategic goals.</p> <p>The Bank uses Risk-Based Pricing (i.e. price dependence on the level of customer and transaction risk) to ensure the profitability of all portfolios included in the loan portfolio.</p> <p>In order to stabilize future results, the Bank applies extensive concentration limits.</p> <p>The Bank prepares risk profile assumptions, taking into account the results of stress tests, so that the risk level on the portfolio is consistent with the adopted risk appetite.</p> <p>The credit risk level is monitored on a monthly basis and in the event of significant deviations from the adopted assumptions, the Bank takes steps to restore the required risk level.</p>
Points (a) and (d) of Article 435(1) CRR	b)	<p>The Bank has defined the credit risk strategy in relation to individual customer groups by:</p> <ul style="list-style-type: none"> defining and introducing credit products to the offer, including a detailed description of their parameters (product sheets), such as: product buyers; subject of financing; product designation; requirements for borrowers; minimum and maximum amount; loan period; the form of functioning of the product and its currency; principles of withdrawals, repayments and grace periods as well as a description of the collaterals used, including information on the required LtV ratio. A strictly defined product offer has been prepared for each of the homogeneous groups of customers, determination of the expected risk profile of customers based on individual ratings or scoring assigned to them and the expected share of individual groups in the loan portfolio. The bank defined the expected distribution of scoring and rating results, definition of the expected risk profile of the credit products implemented at the Bank, expressed in standard risk costs, standard risk costs depend, inter alia, on the value of the probability of impairment and the value of established collateral, making the strategy, in terms of credit risk management, dependent on the distribution channel of individual products (ie Bank Branches, Contact Center, Internet, Agencies and Intermediaries) and the impact of each of them on the credit risk. This was reflected in credit processes dedicated to individual channels and standard risk costs, risk diversification through the use of concentration limits, risk reduction thanks to the application of different DTI levels (an indicator expressing the ratio of the sum of monthly costs related to servicing liabilities and monthly financial liabilities other than credit liabilities to net income), limiting credit risk by establishing loan collateral, credit risk reduction as part of the implementation of defined monitoring processes.

Legal basis	Row number	Details
		<p>Credit Risk Limits</p> <p>Risk appetite</p> <ol style="list-style-type: none"> 1. The Bank defines the risk appetite, which is the maximum level of risk that the Bank is ready to take and accept in connection with its activities. In order to determine the risk appetite, the Bank sets limits for individual risks. The limit is the acceptable risk level estimated by the Bank, beyond which specific management actions necessary to limit further risk growth are taken. 2. The risk appetite is determined on two levels: <ul style="list-style-type: none"> • general - defined by the level of capital security of the total exposure to risk, and • detailed defined - by measures limiting exposure to particular material types of risk. 3. The risk appetite at a general level is determined by the main capital limits. The main capital limits constitute the minimum degree of coverage by the Bank's capitals of the value of the risk exposure held, where the value of the risk exposure held is measured as an unexpected loss that can be realized if individual significant risk types materialize. 4. The detailed risk appetite has been defined through detailed limits limiting the amount of exposure to particular material types of risk. <p>Concentration Limits</p> <p>In order to prevent adverse events resulting from excessive concentration, the Bank limits concentration risk by establishing concentration limits with early warning levels resulting from external regulations and internal analyses conducted by the Bank.</p> <p>Concentration risk management related to lending activities at the Bank concerns in particular:</p> <ol style="list-style-type: none"> 1. Areas resulting from external regulations: <ul style="list-style-type: none"> • risk arising from exposures to entities referred to in Part Four of the CRR Regulation (so-called large exposures), • internal concentration, including the risk arising from exposure to entities referred to in Art. 79a of the Banking Law; 2. Risk arising from exposures to entities with common features such as: <ul style="list-style-type: none"> • the same segment, • the same industry and economic sector, i.e. entities conducting the same business or trading in similar goods, • the same country of residence or registered office, • the same voivodeship of residence or registered office; 3. Risk arising from the product characteristics, including: financing purpose, currency, product type, LtV and loan period; <ul style="list-style-type: none"> • risk arising from exposures secured by the same type of collateral or secured by the same security provider (including the risk arising from the Bank's hedging on securities with similar characteristics); 4. Risks arising from the distribution channel; and other areas where there may be a significant risk of concentration of lending activities.
Point (b) of Article 435(1) CRR	c)	<p>In order to efficiently and effectively manage the Group's credit risk, the supervision, control and responsibility for the operation of this system have been entrusted to:</p> <ol style="list-style-type: none"> 1. The Bank's Supervisory Board, which supervises the Group's credit risk management system, the Group's risk-taking policy's compliance with the Group's strategy and financial plan, and assesses the adequacy and effectiveness of this system, 2. The Risk Committee of the Supervisory Board of the Bank, which supports the Supervisory Board of the Bank in the scope of exercising supervision over the risk management system in the Group,

Legal basis	Row number	Details
	3.	The Management Board of the Bank, which designs, implements and ensures the operation of a coherent credit risk management system in the Group, adjusted to the risk profile, including the rules of credit risk management and determining the credit risk appetite,
	4.	Vice-President of the Management Board supervising material risk management, who is responsible, inter alia, for integrated credit risk management,
	5.	Committees supporting the Bank's Management Board in effective credit risk management: <ul style="list-style-type: none"> • the Credit Risk and Business Initiatives Committee (KRK) - with regard to credit risk, including credit concentration risk, • the Bank's Credit Committee - with regard to issuing recommendations and making credit decisions as well as issuing opinions on credit applications for decisions of the Bank's Management Board.
	6.	Organizational units responsible for credit risk in the scope of identification, measurement and assessment, monitoring, control, reporting and taking management actions related to risk, as well as for ensuring compliance of the internal regulations adopted by the Bank with regard to the implementation of the Risk Management Strategy in accordance with legal and supervisory regulations: <ul style="list-style-type: none"> • Risk Strategy Department - in the area of write-offs, capital adequacy, setting concentration limits, credit risk stress tests, building and managing credit risk models, setting and accounting for credit risk appetite, risk reporting, • Credit Risk Department - in the scope of shaping the credit risk policy, monitoring the Business Client and the security policy, • The Department of Credit Operations and Debt Collection KI - in the field of monitoring, restructuring and collection of a loan granted in the KI segment and sole proprietorships in the Micro segment, whose total credit exposure does not exceed PLN 500 thousand, • The Department of Monitoring, Restructuring and Debt Collection of Business Customers - in the field of monitoring, restructuring and recovery of the granted credit in the KB segment, • The Operational Risk Management Department - in the scope of designing, organizing and managing control processes of organizational units of the Bank's risk area, • Department of Credit Analysis and Collateral Valuation - in the scope of analysis of KI and KB loan applications, making credit decisions (for KI of the Micro and Small segment) and administration of KB loans, as well as performing collateral valuations and monitoring for all segments, • Business Customer Credit Analysis Department - in the field of making credit decisions, analyzing credit applications for structured transactions and strategic clients and administering these loans, • Department of Model Validation - in terms of model validation processes and quantification of their risk.

Additionally, the Audit Department conducts independent audits to provide the Supervisory Board and the Management Board of the Bank with objective information, including the assessment of the effectiveness and adequacy of the Group's risk management system.

Point (b) of Article 435(1) CRR	d)	The credit risk management and internal control system at the Bank operates in line with the three lines of defense model: <ul style="list-style-type: none"> • The first line of defense is performed by business units that operate within the processes and policies developed by the second line of defense risk management units. • The function of the second line of defense consists of units responsible for risk management, i.e., units responsible for developing strategies and policies, designing risk management processes, monitoring and reporting risk, implementing control mechanisms, as well as credit analysts who operate within the framework of the developed processes and policies,
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Legal basis	Row number	Details
		<p>Process Development and Control Team in the Department of Credit Analysis and Collateral Valuation.</p> <ul style="list-style-type: none"> The third line of defense is the Audit Department, which is responsible for conducting independent audits of the Bank's credit risk management system in accordance with the approved audit plan.

EU CRB – Additional disclosure related to the credit quality of assets

Legal basis	Row number	Details
Points (a) and (b) of Article 442 CRR	a)	<p>The Bank defines evidence of impairment based on regulations and supervisory guidelines:</p> <ul style="list-style-type: none"> EU Regulation No. 575/2013, Art. 178 and the EBA/GL/2016/07 guidelines on the application of the definition of default and the Regulation of the Minister of Finance, Investment and Development of 3/10/2019 on the materiality level of an overdue credit obligation and EU Regulation No. 2021/451, Recommendation R of the Polish Financial Supervision Authority regarding the rules for classifying credit exposures, estimating and recognizing expected credit losses and credit risk management issued in April 2021, and own experience related to credit risk management. <p>The Bank, in accordance with Art. 178 sec. The second subparagraph of Article 1 of Regulation (EU) No 575/2013:</p> <ul style="list-style-type: none"> in the case of retail exposures, it applies the definition of default at the level of individual credit instruments (taking into account contagion in the case of arrears significant for the entire relationship), for commercial exposures, it applies the definition of default at the obligor level. <p>The key indicators of impairment are:</p> <ul style="list-style-type: none"> significant delay in repayment, understood as a delay in repayment for a period longer than 90 days, while meeting the criterion of significance of the overdue amount (i.e. PLN 400 for retail clients and PLN 2 thousand for commercial clients and 1% significance), significant deterioration of the economic and financial situation (including a significant deterioration of the internal scoring/rating assessment) affecting the risk of the customer meeting the original contractual terms regarding the servicing of liabilities towards the Bank, restructuring understood as a concession granted in terms of financing as a result of significant financial difficulties of the borrower, if, among others, it reduces the NPV of the asset by more than 1%, introduces a balloon installment or significantly postpones the servicing of principal installments, submission by a business client of an application for restructuring, bankruptcy and liquidation proceedings, effective termination of the contract, consumer bankruptcy of an individual client, death of an individual client (taking into account the impact on the risk of debt servicing in the case of joint liabilities of many debtors), lack of information about the whereabouts of an individual client, to the extent that it negatively affects the timeliness of the engagement, loss of job of an individual client (recognized based on the assessment of the client's inability to repay the debt due to job loss), initiation of court or enforcement proceedings, questioning of the exposure by the debtor, extortion, cessation of operations,

Legal basis	Row number	Details
		<ul style="list-style-type: none"> • warranty implementation, • default of an individual client as a result of recognizing a default in his sole proprietorship. <p>The above catalog is an open collection.</p> <p>In the event of an event that may constitute an indication of impairment, not covered by the above-mentioned the catalog is used to assess its significance for the risk of the client's failure to fulfill his obligations towards the Bank based on the original contractual terms and, if justified, impairment indicators are marked.</p> <p>The Bank assesses all customer credit exposures in terms of identifying objective evidence of impairment on a daily basis in terms of quantitative and process-related evidence, and according to the most up-to-date data on the date of the assessment in terms of evidence of the client's financial standing.</p> <p>The default identification process is carried out in a dedicated, centralized system, where all debtors of the Bank and the Capital Group are assessed according to uniform criteria.</p> <p>In 2025, the Bank did not identify the justification for introducing any changes to the principles of recognizing impairment indicators.</p>
<p>Points (a) and (b) of Article 442 CRR</p>	<p>b)</p>	<p>All past due exposures that meet the materiality criteria and reach 90 days past due constitute default and result in recognizing the exposure as impaired. One reason when an exposure past due for more than 90 days will not result in the classification of impaired exposures is the fact that it is intangible (i.e. below 1% of the relative criterion and PLN 400 / PLN 2 thousand for retail and commercial customers, respectively).</p>
<p>Points (a) and (b) of Article 442 CRR</p>	<p>c)</p>	<p>The Bank in accordance with Commission Delegated Regulation (EU) No. 183/2014 of 20 December 2013 supplementing Regulation (EU) No. 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms with regard to regulatory technical standards regarding determining the method of calculating adjustments for specific and general credit risk, as part of the calculation of capital requirements, it includes adjustments for specific credit risk after obtaining permission from the Polish Financial Supervision Authority to include the result of a given period in the Bank's own funds or in the event of a loss, when the appropriate amounts have been deducted on Common Equity Tier 1 capital. In particular, as at 31 December 2025, the Bank, as part of the adjustments for specific credit risk, took into account the adjustments from the last date as of which it included the result (profit) in its own funds, i.e. from 30 June 2025.</p>
<p>Points (a) and (b) of Article 442 CRR</p>	<p>d)</p>	<p>Exposures for which facilities are granted to customers due to their deteriorated financial situation are classified as restructured exposures (forbearance).</p> <p>For the purposes of classification for forbearance, the Bank considers the customer's deteriorated financial situation to be an event when the following occurs at the time of granting the facility:</p> <ul style="list-style-type: none"> • within three months before the date of granting the facility, the customer's restructured account was overdue for more than 30 days or • on the client's restructured account, the quality assessment indicated the occurrence of a deterioration in credit risk since initial recognition within three months before the facility was granted, or • the client was on the watch list in the three months before the accommodation was granted. <p>For the purposes of classifying a forbearance exposure as non-performing (resulting in the identification of an impairment trigger), the Bank considers an event to be the case when at least the following occur at the time of granting the forbearance:</p> <ul style="list-style-type: none"> • the exposure is considered non-performing (ie there are other indications of impairment) or

Legal basis	Row number	Details
		<ul style="list-style-type: none"> as a result of the facility, financial liabilities are reduced by writing off a significant part of the exposure or the facility granted causes a decrease in the NPV of the restructured exposure by more than 1% or the repayment plan used is not based on credible macroeconomic assumptions and the borrower's assessment of the borrower's ability and readiness to repay, or the amended agreement contains significant deferrals in the commencement of repayment (for capital over 2 years), or the amended agreement provides for a large lump sum (balloon) payment at the end of the amended repayment schedule. <p>Forbearance exposures are classified to Stage 2, non-performing forbearance exposures, constituting a default indication, are classified to Stage 3.</p>

Recommendation R – regarding the rules for classifying credit exposures, estimating and recognizing expected credit losses and credit risk management

Legal basis	Details
<p>Recommendation R</p>	<p>In accordance with IFRS 9, for all financial instruments measured at amortized cost or at fair value through other comprehensive income, the Bank estimates allowances for expected credit losses.</p> <p>Principles of estimating allowances for exposures without evidence of impairment (Stage 1 and Stage 2)</p> <p>Exposures for which no indications of impairment have been identified are assessed in accordance with the principle of homogeneity in relation to the risk profile and a write-down is created to cover expected credit loss (ECL). Estimation of expected losses for exposures designated to Stage 1 and Stage 2 is made on the basis of:</p> <ul style="list-style-type: none"> the estimated exposure value at the time of default (EAD model), estimated distribution of default risk over the lifetime of the exposure (life-time PD model based on scoring and rating models), the estimated level of loss in the event of the client's default (LGD model). <p>Rules for estimating write-downs for exposures with identified evidence of impairment (Stage 3)</p> <p>Exposures for which evidence of impairment has been identified are divided into individually or collectively valued exposures.</p> <p>For the purposes of collective valuation, groups with similar credit risk characteristics are identified and assessed collectively for impairment. Group valuation based on LGD models, takes into account, among others, behavioral behavior in the field of debt service and the time a given exposure remains in default, and takes into account the specificity of a given group in terms of expected recoveries and the individual value of collateral for each exposure.</p> <p>The individual valuation is based on a scenario analysis. Each scenario has an assigned probability of realization and expected recoveries reflecting the restructuring and debt collection strategies conducted towards the client.</p> <p>Exposures covered by the individual or group assessment method, for which the Bank does not identify a single loss, are grouped into homogeneous populations for which the Bank sets the minimum level of loss (the so-called LGD floor).</p> <p>Macroeconomic factors</p> <p>In accordance with IFRS 9, both the assessment of a significant deterioration in credit quality and the estimation of write-offs, in addition to reflecting the current quality of the loan portfolio, take into account the expected macroeconomic factors (FLI, forward-looking information) that will occur in the future.</p>

Legal basis	Details
	<p>The Bank ensures that future macroeconomic factors are taken into account in all significant components of the estimation of expected credit losses. FLI adjustments developed for individual risk parameters ensure adjustment of the risk parameter estimates to future macroeconomic factors and are taken into account at the level of individual exposures. As part of individual models of expected loss parameters, the Bank developed econometric solutions and sensitivity analyzes to assess the impact of macroeconomic scenarios on the behavior of the loan portfolio.</p> <p>In the table below, the Group presents the values of input parameters of IFRS 9 models for homogeneous portfolios.</p> <p>In terms of the non-default portfolio, the Group presents the portfolio broken down into Stage 1, Stage 2 and POCI with the following parameters: gross carrying amount, off-balance sheet exposure, EAD, 12-month probability of default ("average PD expressed in %"), average LGD and maturity by current balance sheet date (i.e. 31.12.2025) decomposed according to ranges ("PD Scale") of the default probability determined on the date of initial recognition for the periods corresponding to the 12-month period following the current balance sheet date.</p> <p>In terms of the default portfolio (including POCI), the Group presents the gross value of exposures, average LGD (%) and the amount of the allowance (ECL) according to the ranges of exposures remaining in default.</p>

Business Client exposure portfolio 31.12.2025

PLN m

	a	b	c	d	e	f	g	h	
	Gross original balance sheet exposures	Off-balance sheet exposures	EAD after credit risk mitigation and credit conversion factor applied	Average PD expressed in % of the allowable range (from 0% to 100%)	Number of exposures	Average LGD in %	Average maturity	Expected Credit Loss (ECL)	
PD scale									
Stage 1	from 0,00 to <0,15%	5	22	18	0.79%	248	20.17%	11	0
	from 0,15% to <0,25%	510	835	770	0.40%	207	59.06%	52	2
	from 0,25% to <0,50%	492	1 408	981	0.52%	592	44.59%	49	1
	from 0,5% to <0,75%	6 603	1 400	7 588	0.67%	760	25.79%	101	13
	from 0,75% to <2,50%	5 333	6 114	9 007	1.41%	6 361	26.62%	46	28
	from 2,50% to <10,00%	3 580	1 665	4 437	3.80%	10 532	28.49%	56	37
	from 10,00% to <45,00%	459	303	550	7.72%	1 795	30.18%	62	11
	from 45,00% to <100,00	1	0	1	13.84%	8	25.92%	21	0
	100%	4	1	5	5.44%	40	19.94%	38	0
Stage 2	from 0,00 to <0,15%	22	23	36	4.00%	362	27.59%	25	1
	from 0,15% to <0,25%	37	14	44	5.35%	262	24.78%	37	1
	from 0,25% to <0,50%	154	51	174	4.01%	810	20.55%	75	3
	from 0,5% to <0,75%	283	154	313	5.99%	1 102	27.78%	58	8
	from 0,75% to <2,50%	1 837	663	2 048	7.11%	6 848	27.89%	59	89
	from 2,50% to <10,00%	1 593	524	1 717	10.45%	3 324	23.15%	45	69
	from 10,00% to <45,00%	232	27	224	23.82%	621	24.36%	36	16
	from 45,00% to <100,00	8	1	8	38.93%	21	22.10%	38	1
	100%	6	0	6	39.33%	40	25.79%	54	1
Unrated	2	70	47	0.00%	19 224	64.36%	16	4	
POCI	100%	40	0	58	4.58%	68	19.25%	113	-16

	a	b	c	d	
	EAD after credit risk mitigation and credit conversion factor applied	Number of exposures	Average LGD in %	Expected Credit Loss (ECL)	
Time in default					
Stage 3	up to 12 months	765	4 197	40.05%	306
	from 13 to 24 months	505	3 058	54.87%	277
	from 25 to 36 months	326	3 299	49.46%	161
	from 37 to 48 months	115	1 269	53.89%	62
	from 49 to 60 months	182	646	31.92%	58
	from 61 to 84 months	311	644	50.63%	158
	over 84 months	81	511	38.55%	31
POCI	up to 12 months	3	20	-33.73%	-1
	from 13 to 24 months	22	119	-11.48%	-2
	from 25 to 36 months	30	179	5.26%	2
	from 37 to 48 months	12	77	42.01%	5
	from 49 to 60 months	3	48	-3.00%	0
	from 61 to 84 months	9	25	-86.55%	-7
	over 84 months	102	186	39.72%	40

Retail Client exposure portfolio - Mortgage 31.12.2025

PLN m

	a	b	c	d	e	f	g	h	
	Gross original balance sheet exposures	Off-balance sheet exposures	EAD after credit risk mitigation and credit conversion factor applied	Average PD expressed in % of the allowable range (from 0% to 100%)	Number of exposures	Average LGD in %	Average maturity	Expected Credit Loss (ECL)	
PD scale									
Stage 1	from 0.00 to <0.15%	1 971	358	2 328	0.07%	5 440	13.76%	295	0
	from 0.15% to <0.25%	1 421	88	1 509	0.13%	5 030	14.37%	274	0
	from 0.25% to <0.50%	4 964	109	5 074	0.17%	16 305	15.30%	283	1
	from 0.5% to <0.75%	2 630	51	2 680	0.31%	11 836	15.03%	259	1
	from 0.75% to <2.50%	9 903	44	9 947	0.45%	41 277	15.79%	262	7
	from 2.50% to <10.00%	1 279	1	1 281	0.65%	3 342	18.10%	288	2
	from 10.00% to <45.00%	7	0	7	3.54%	60	15.74%	169	0
	from 45.00% to <100.00	1	0	1	12.58%	2	19.21%	311	0
	100%	6	0	6	2.95%	42	15.59%	188	0
Stage 2	from 0.00 to <0.15%	191	0	191	2.98%	909	15.47%	218	3
	from 0.15% to <0.25%	99	0	99	3.25%	513	15.76%	210	2
	from 0.25% to <0.50%	256	0	256	4.04%	1 256	16.38%	235	6
	from 0.5% to <0.75%	196	0	196	3.45%	1 026	15.85%	227	4
	from 0.75% to <2.50%	645	0	645	7.43%	2 764	17.70%	255	27
	from 2.50% to <10.00%	129	0	129	9.14%	359	20.00%	295	8
	from 10.00% to <45.00%	1	0	1	5.81%	4	18.42%	248	0
	from 45.00% to <100.00	0	0	0	0.00%	0	0.00%	0	0
	100%	1	0	1	6.98%	6	19.57%	263	0
Unrated	0	0	0	0.00%	0	0.00%	0	0	
POCI	100%	1	0	1	8.58%	9	18.72%	278	0

	a	b	c	d	
	EAD after credit risk mitigation and credit conversion factor applied	Number of exposures	Average LGD in %	Expected Credit Loss	
Time in default					
Stage 3	up to 12 months	121	461	24.35%	30
	from 13 to 24 months	48	192	25.83%	13
	from 25 to 36 months	34	143	29.14%	10
	from 37 to 48 months	13	61	40.27%	5
	from 49 to 60 months	12	22	55.29%	7
	from 61 to 84 months	19	42	58.51%	11
	over 84 months	13	27	88.54%	12
POCI	up to 12 months	0	2	-3.91%	0
	from 13 to 24 months	0	4	-49.17%	0
	from 25 to 36 months	0	3	-28.23%	0
	from 37 to 48 months	1	3	3.67%	0
	from 49 to 60 months	1	4	20.88%	0
	from 61 to 84 months	0	3	64.77%	0
	over 84 months	0	2	62.80%	0

Retail client exposure portfolio - Other 31.12.2025

PLN m

	a	b	c	d	e	f	g	h	
	Gross original balance sheet exposures	Off-balance sheet exposures	EAD after credit risk mitigation and credit conversion factor applied	Average PD expressed in % of the allowable range (from 0% to 100%)	Number of exposures	Average LGD in %	Average maturity	Expected Credit Loss (ECL)	
PD scale									
Stage 1	from 0.00 to <0.15%	1 332	27	1 339	0.13%	493 595	37.86%	27	0
	from 0.15% to <0.25%	872	45	884	0.30%	315 326	40.35%	33	1
	from 0.25% to <0.50%	1 993	116	2 041	0.65%	470 476	43.30%	44	5
	from 0.5% to <0.75%	1 403	60	1 421	1.09%	262 577	45.24%	52	6
	from 0.75% to <2.50%	5 156	235	5 229	1.73%	728 370	46.89%	59	39
	from 2.50% to <10.00%	6 302	157	6 355	4.08%	537 935	49.45%	71	119
	from 10.00% to <45.00%	311	2	311	8.58%	19 197	50.60%	76	12
	from 45.00% to <100.00	1	0	1	5.28%	36	43.96%	51	0
	100%	8	1	8	5.30%	613	46.83%	55	0
Stage 2	from 0.00 to <0.15%	122	327	215	1.09%	84 509	63.59%	82	7
	from 0.15% to <0.25%	89	158	142	1.68%	56 416	62.59%	81	6
	from 0.25% to <0.50%	111	57	128	3.66%	30 260	52.51%	64	5
	from 0.5% to <0.75%	113	12	116	5.22%	13 041	46.17%	53	5
	from 0.75% to <2.50%	616	25	619	9.44%	66 168	46.68%	57	46
	from 2.50% to <10.00%	822	2	821	23.78%	54 028	49.00%	71	149
	from 10.00% to <45.00%	54	0	54	43.14%	2 721	51.84%	82	17
	from 45.00% to <100.00	0	0	0	20.26%	10	48.06%	70	0
	100%	2	0	2	15.06%	197	46.33%	67	0
	Unrated	9	0	9	3.92%	338 791	46.60%	69	8
POCI	100%	2	2	7	8.63%	1 108	53.57%	81	-4

	a	b	c	d	
	EAD after credit risk mitigation and credit conversion factor applied	Number of exposures	Average LGD in %	Expected Credit Loss	
Time in default					
Stage 3	up to 12 months	474	36 385	54.35%	257
	from 13 to 24 months	105	8 181	47.66%	50
	from 25 to 36 months	71	8 278	58.31%	41
	from 37 to 48 months	33	2 621	70.95%	23
	from 49 to 60 months	16	1 125	90.07%	14
	from 61 to 84 months	11	1 363	95.35%	11
	over 84 months	34	2 502	99.55%	34
POCI	up to 12 months	1	81	-24.27%	0
	from 13 to 24 months	1	60	-59.29%	0
	from 25 to 36 months	2	767	-28.06%	-1
	from 37 to 48 months	2	511	-16.19%	0
	from 49 to 60 months	0	100	-10.19%	0
	from 61 to 84 months	0	147	73.68%	0
	over 84 months	1	773	81.66%	1

Portfolio of exposures from the Leasing Activity 31.12.2025

PLN m

	a	b	c	d	e	f	g	h	
	Gross original balance sheet exposures	Off-balance sheet exposures	EAD after credit risk mitigation and credit conversion factor applied	Average PD expressed in % of the allowable range (from 0% to 100%)	Number of exposures	Average LGD in %	Average maturity	Expected Credit Loss (ECL)	
PD scale									
	from 0.00 to <0.15%								
	from 0.15% to <0.25%								
	from 0.25% to <0.50%	52	0	52	0.42%	555	9.16%	41	0
	from 0.5% to <0.75%	29	0	29	0.61%	293	14.27%	47	0
Stage 1	from 0.75% to <2.50%	1 434	0	1 434	0.93%	25 334	9.17%	29	2
	from 2.50% to <10.00%	4 489	0	4 489	3.36%	51 411	16.61%	39	29
	from 10.00% to <45.00%	81	0	81	11.79%	942	17.50%	42	2
	from 45.00% to <100.00	1	0	1	1.18%	15	6.37%	19	0
	100%								
	from 0.00 to <0.15%								
	from 0.15% to <0.25%								
	from 0.25% to <0.50%								
	from 0.5% to <0.75%								
Stage 2	from 0.75% to <2.50%	153	0	153	21.58%	2 682	10.50%	27	4
	from 2.50% to <10.00%	531	0	531	35.02%	5 570	15.78%	32	31
	from 10.00% to <45.00%	11	0	11	36.21%	422	9.21%	23	0
	from 45.00% to <100.00								
	100%								
	Unrated								
POCI	100%								

		a	b	c	d
		EAD after credit risk mitigation and credit conversion factor applied	Number of exposures	Average LGD in %	Expected Credit Loss
Time in default					
Stage 3	up to 12 months	211	3 685	24.42%	51
	from 13 to 24 months	90	1 367	49.33%	44
	from 25 to 36 months	49	866	68.86%	33
	from 37 to 48 months	14	328	84.19%	12
	from 49 to 60 months	4	124	90.22%	4
	from 61 to 84 months	6	99	66.60%	4
	over 84 months	1	22	92.45%	1
POCI	up to 12 months				
	from 13 to 24 months				
	from 25 to 36 months				
	from 37 to 48 months				
	from 49 to 60 months				
	from 61 to 84 months				
	over 84 months				

EU CR1 – Performing and non-performing exposures and related provisions

PLN m

		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received		
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures	
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3				
		a	b	c	d	e	f	g	h	i	j	k	l		m	n	o
		0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	0120	0130	0140	0150	
Cash balances at central banks and other demand deposits	0010	3 627	3 627														
Loans and advances	0020	66 607	58 284	8 280	3 846		3 619	-861	-326	-555	-1 938		-1 902	-302	31 613	1 585	
Central banks	0030																
General governments	0040	13	8	5											6		
Credit institutions	0050	2 203	2 203														
Other financial corporations	0060	1 029	1 018	11	5		5	-3	-3	-1	-2		-2		87	2	
Non-financial corporations	0070	14 241	10 824	3 377	1 739		1 567	-153	-59	-109	-848		-812	-148	9 133	891	
Of which SMEs	0080	11 698	8 487	3 172	1 349		1 177	-139	-48	-107	-595		-558	-46	8 224	754	
Households	0090	49 122	44 231	4 887	2 102		2 047	-704	-264	-445	-1 087		-1 088	-154	22 386	692	
Debt securities	0100	25 950	25 950					-12	-12								
Central banks	0110	1 099	1 099														
General governments	0120	23 599	23 599					-12	-12								
Credit institutions	0130	626	626														
Other financial corporations	0140	626	626														
Non-financial corporations	0150																
Off-balance-sheet exposures	0160	14 441	12 331	2 108	68		68	36	19	16					3 264	23	
Central banks	0170																
General governments	0180	186	124	63				2		2							
Credit institutions	0190	11	11	1													
Other financial corporations	0200	238	237												61		
Non-financial corporations	0210	11 331	10 042	1 289	57		57	21	15	6					2 905	22	
Households	0220	2 675	1 918	755	11		11	12	4	8					298	1	
Total	0230	110 625	100 192	10 388	3 914		3 687	-909	-357	-571	-1 938		-1 902	-302	34 877	1 608	

EU CR1-A – Maturity of exposures

PLN m

		Net exposure value						
		On demand	<= 1 year	> 1 year <= 5	> 5 years	No stated	Total	
		a	b	c	d	e	f	
		0010	0020	0030	0040	0050	0060	
1	Loans and advances	0010	6 929	9 324	25 075	37 109	3 691	82 128
2	Debt securities	0020		3 901	20 069	1 968		25 938
3	Total	0030	6 929	13 225	45 144	39 077	3 691	108 066

EU CR2 – Changes in the stock of non-performing loans and advances

PLN m

		Gross carrying amount	
		a	
		0010	
	Initial stock of non-performing loans and advances	0010	4 492
	Inflows to non-performing portfolios	0020	1 625
	Outflows from non-performing portfolios	0030	-2 271
	Outflows due to write-offs	0040	-864
	Outflow due to other situations	0050	-1 407
	Final stock of non-performing loans and advances	0060	3 846

EU CR2a – Changes in the stock of non-performing loans and advances and related net accumulated recoveries

PLN m

		Gross carrying amount		Related net accumulated recoveries	
		a		b	
		0010		0020	
	Initial stock of non-performing loans and advances	0010	4 492		
	Inflows to non-performing portfolios	0020	1 625		
	Outflows from non-performing portfolios	0030	-2 271		
	Outflow to performing portfolio	0040	-210		
	Outflow due to loan repayment, partial or total	0050	-417		
	Outflow due to collateral liquidations	0060	-259		259
	Outflow due to taking possession of collateral	0070			
	Outflow due to sale of instruments	0080	-436		339
	Outflow due to risk transfers	0090			
	Outflows due to write-offs	0100	-864		
	Outflow due to other situations	0110	-86		
	Outflow due to reclassification as held for sale	0120			
	Final stock of non-performing loans and advances	0130	3 846		

EU CQ1 – Credit quality of forborne exposures

PLN m

		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures				
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures	g	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures			
			b	Of which defaulted	Of which impaired					e	f	h
0010	0020	0030	0040	0050	0060	0070	0080					
Cash balances at central banks and other demand deposits	0010											
Loans and advances	0020	865	1 018	1 018	1 018	-32	-361	1 039	508			
Central banks	0030											
General governments	0040											
Credit institutions	0050											
Other financial corporations	0060	1	1	1	1			1				
Non-financial corporations	0070	307	594	594	594	8	-181	602	375			
Households	0080	557	423	423	423	-40	-179	435	133			
Debt Securities	0090											
Loan commitments given	0100	45						37				
Total	0110	910	1 018	1 018	1 018	-32	-361	1 076	508			

EU CQ2 – Quality of forbearance

PLN m

		Gross carrying amount of forborne exposures	
		a	
		0010	
Loans and advances that have been forborne more than twice	0010		576
Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	0020		1 017

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

PLN m

		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
		a	b	c	d	e	f	g	h	i	j	k	l
		0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	0120
Cash balances at central	0010	3 627	3 627										
Loans and advances	0020	66 607	66 135	471	3 846	1 701	358	545	446	573	124	99	3 846
Central banks	0030												
General governments	0040	13	13										
Credit institutions	0050	2 203	2 203										
Other financial corporations	0060	1 029	1 028	1	5	2				2			5
Non-financial corporations	0070	14 241	14 171	70	1 739	965	139	180	152	201	70	30	1 739
<i>Of which SMEs</i>	0080	11 698	11 633	65	1 349	639	138	177	148	201	19	28	1 349
Households	0090	49 122	48 721	401	2 102	734	218	365	293	370	53	68	2 102
Debt securities	0100	25 950	25 950										
Central banks	0110	1 099	1 099										
General governments	0120	23 599	23 599										
Credit institutions	0130	626	626										
Other financial corporations	0140	626	626										
Non-financial corporations	0150												
Off-balance-sheet exposures	0160	14 441			68								68
Central banks	0170												
General governments	0180	186											
Credit institutions	0190	11											
Other financial corporations	0200	238											
Non-financial corporations	0210	11 331			57								57
Households	0220	2 675			11								11
Total	0230	110 625	95 712	471	3 914	1 701	358	545	446	573	124	99	3 914

EU CQ4 – Quality of non-performing exposures by geography

PLN m

		Gross carrying/nominal amount			Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures	
		Of which non-performing		Of which subject to impairment				
			Of which defaulted					
		a	b	c	d	e	f	g
		0010	0020	0030	0040	0050	0060	0070
On-balance-sheet exposures	0010							
Off-balance-sheet exposures	0080							
Total	0150							

The quality of NPEs broken down geographically is presented when the foreign primary exposures in all 'external' countries in all exposure classes are equal to or higher than 10% of the total primary exposures (domestic and foreign).

As at December 31, 2025, the share of foreign NPEs in total exposures was **8.97%**.

EU CQ5 – Credit quality of loans and advances to non-financial corporations by industry

PLN m

			Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which non-performing		Of which loans and advances subject to impairment			
				Of which defaulted				
			a	b	c	d		
0010	0020	0030	0040	0050	0060			
010	Agriculture, forestry and fishing	0010	121	11	11	121	-5	
020	Mining and quarrying	0020	128	112	112	128	-70	
030	Manufacturing	0030	3 097	485	485	3 097	-359	
040	Electricity, gas, steam and air conditioning supply	0040	855	87	87	855	-52	
050	Water supply	0050	90	4	4	90		
060	Construction	0060	1 485	54	54	1 485	-23	
070	Wholesale and retail trade	0070	2 784	195	195	2 784	-105	
080	Transport and storage	0080	2 245	197	197	2 245	-99	
090	Accommodation and food service activities	0090	897	94	94	897	-24	
100	Information and communication	0100	515	11	11	515	-7	
110	Financial and insurance activities	0110	35	3	3	35	-2	
120	Real estate activities	0120	2 041	391	391	2 041	-200	
130	Professional, scientific and technical activities	0130	239	14	14	239	-8	
140	Administrative and support service activities	0140	685	35	35	685	-18	
150	Public administration and defense, compulsory social security	0150	188	10	10	188	-7	
160	Education	0160	42	3	3	42	-2	
170	Human health services and social work activities	0170	315	27	27	315	-16	
180	Arts, entertainment and recreation	0180	197	3	3	197	-2	
190	Other services	0190	22	2	2	22	-1	
200	Total	0200	15 981	1 738	1 738	15 981	-1 000	

EU CQ6 – Collateral valuation - loans and advances

PLN m

			Loans and advances																				
			Performing			Non-performing																	
						Past due > 90 days																	
			Of which past due > 30 days ≤ 90 days			Unlikely to pay that are not past due or are past due ≤ 90 days		Of which: past due > 90 days ≤ 180 days						Of which: past due > 180 days ≤ 1 year		Of which: past due > 1 years ≤ 2 years		Of which: past due > 2 years ≤ 5 years		Of which: past due > 5 years ≤ 7 years		Of which: past due > 7 years	
			a	b	c	d	e	f	g	h	i	j	k	l									
			0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	0120									
010	Gross carrying amount	0010	70 453	66 607	471	3 846	1 701	2 145	358	545	446	573	124	99									
020	<i>Of which secured</i>	0020	36 982	34 394	297	2 588	1 242	1 345	200	305	291	408	102	39									
030	<i>Of which secured with immovable property</i>	0030	23 392	22 304	193	1 088	660	427	72	79	42	144	43	48									
040	<i>Of which instruments with LTV higher than 60% and lower or equal to 80%</i>	0040	6 768	6 602		166	64	102															
050	<i>Of which instruments with LTV higher than 80% and lower or equal to 100%</i>	0050	3 951	3 742		209	100	109															
060	<i>Of which instruments with LTV higher than 100%</i>	0060	832	640		192	154	37															
070	Accumulated impairment for secured assets	0070	-1 215	-268	-26	-947	-388	-559	-58	-110	-124	-211	-47	-9									
080	Collateral	0080																					
090	<i>Of which value capped at the value of</i>	0090	28 999	28 072	236	927	557	370	85	89	45	77	44	30									
100	<i>Of which immovable property</i>	0100	22 562	21 880	179	681	413	268	52	61	29	72	25	30									
110	<i>Of which value above the cap</i>	0110	40 809	37 640	289	3 169	1 891	1 278	211	292	260	372	67	76									
120	<i>Of which immovable property</i>	0120	30 863	28 986	187	1 878	1 230	647	120	139	85	173	61	69									
130	Financial guarantees received	0130	4 200	3 541	23	659	262	397	51	103	119	120	4										
140	Accumulated partial write-off	0140	-302			-302	-111	-192	-5	-22	-37	-88	-15	-25									

EU CQ7 – Collateral obtained by taking possession and execution processes

PLN m

			Collateral obtained by taking possession	
			Value at initial recognition	Accumulated negative changes
			a	b
			0010	0020
010	Property, plant and equipment (PP&E)	0010		
020	Other than PP&E	0020		
030	<i>Residential immovable property</i>	0030		
040	<i>Commercial Immovable property</i>	0040		
050	<i>Movable property (auto, shipping, etc.)</i>	0050		
060	<i>Equity and debt instruments</i>	0060		
070	<i>Other collateral</i>	0070		
080	Total	0080		

The Bank does not currently practice the repossession of collateral in connection with non-performing exposures, for this reason, as at 31 December 2025, there are no disclosures regarding assets repossessed through enforcement proceedings, according to templates EU CQ7 and EU CQ8, published in Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosure by institutions of information referred to in Titles II and III of Part Eight of that Regulation and repealing Commission Implementing Regulation (EU) 2021/637.

EU CQ8 – Collateral obtained by taking possession and execution processes – vintage breakdown

PLN m

Debt balance reduction			Total collateral obtained by taking possession									
			Value at initial recognition	Accumulated negative changes	Foreclosed ≤ 2 years		Foreclosed > 2 years ≤ 5 years		Foreclosed > 5 years		Of which non-current assets held-for-sale	
Gross carrying amount	Accumulated negative changes	Value at initial recognition			Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	
a	b	c	d	e	f	g	h	i	j	k	l	
0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	0120	
010	Collateral obtained by taking possession	0010										
020	Collateral obtained by taking possession other than that classified as PP&E	0020										
030	<i>Residential immovable property</i>	0030										
040	<i>Commercial immovable property</i>	0040										
050	<i>Movable property (auto, shipping, etc.)</i>	0050										
060	<i>Equity and debt instruments</i>	0060										
070	<i>Other collateral</i>	0070										
080	Total	0080										

The Bank does not currently practice the repossession of collateral in connection with non-performing exposures, for this reason, as at 31 December 2025, there are no disclosures regarding assets repossessed through enforcement proceedings, according to templates EU CQ7 and EU CQ8, published in Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosure by institutions of information referred to in Titles II and III of Part Eight of that Regulation and repealing Commission Implementing Regulation (EU) 2021/637.

EU CRC – Qualitative disclosure requirements related to CRM techniques

Legal basis	Row number	Details
Article 453 (a) CRR	a)	The Bank does not offset balance sheet and off-balance sheet position for the purposes of credit risk mitigation techniques.
Article 453 (b) CRR	b)	<p>The Bank monitors the effectiveness of establishing collateral by:</p> <ul style="list-style-type: none"> • verification of completeness and correctness of security documentation, • checking the validity of the collateral - in the case of collateral accepted for a specified period, the collateral renewal process is carried out, e.g. an insurance policy, • verification of the current value of collateral - collateral review is carried out at least once a year. <p>The Bank reduces the risk related to individual collaterals and collateral providers by setting concentration limits, taking into account the safety buffer due to the exchange rate risk and liquidity risk, and constant monitoring of both the effectiveness of establishing collateral and its value during the loan period.</p>
Article 453 (c) CRR	c)	<p>The Bank allows all types and legal forms of collateral accepted under Polish law. The Bank accepts, in particular, the following legal forms of security:</p> <ul style="list-style-type: none"> • guarantees, re-guarantees and sureties, • guarantees under programs implemented by BGK, • blockades, • pledges, • transfers of ownership, • assignments of receivables, • credit insurance, • bills of exchange, • mortgage, • power of attorney to a bank account, • bails as a special form of security, • notarized declaration of submission to enforcement pursuant to Art. 777 of the Civil Procedure Code. <p>The Bank strives to establish collateral in a manner that is adequate to the incurred credit risk and is flexible in relation to the needs and possibilities of its customers. As part of the offer for customers, there are products made available without security and those whose availability is limited by the establishment of security.</p> <p>The proportions between the level of exposure and the value of collateral are regulated by LtV ratios, taking into account various types of risks, including collateral impairment risk, foreign exchange risk, interest rate risk, liquidity risk or other risk specific to a given type of product. The Bank's clients are informed about the value of these ratios in the course of ongoing contacts with the Bankers or in the Bank's branches.</p> <p>When determining the value of the collateral, the Bank follows the principle of prudent valuation and adopts the market value or the value possible (real) to be recovered if the collateral is satisfied. The bank has appropriate tools to verify the valuation of collateral.</p>
Article 453 (d) CRR	d)	The main provider of unfunded credit protection at the Bank is Bank Gospodarstwa Krajowego (BGK), which conducts guarantee and surety activities as part of the implementation of government surety and guarantee programs or on behalf and for the account of the State Treasury pursuant to the Act of May 8, 1997 on sureties and guarantees granted by the State Treasury and certain legal entities, in particular for the micro, small and medium-sized enterprises sector. BGK guarantees constitute 89.6% of the bank's unfunded credit protection. The providers of the remaining 10.4% of the guarantees is the State Treasury.

Legal basis	Row number	Details
Article 453 (e) CRR	e)	In order to prevent unfavorable events resulting from excessive concentration, the Bank limits the concentration risk by setting concentration limits and standards resulting from external regulations and internal analyzes conducted by the Bank. Concentration risk management in relation to credit activities in the Bank concerns, inter alia, risk resulting from exposures secured by the same type of collateral or secured by the same collateral provider (including the risk resulting from the Bank's collateral on securities with similar characteristics).

EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

PLN m

			Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
			a	b	c	d	e
			0010	0020	0030	0040	0050
1	Loans and advances	0010	38 083	33 198	28 999	4 199	
2	Debt securities	0020	25 938				
3	Total	0030	64 021	33 198	28 999	4 199	
4	Of which non-performing exposures	0040	323	1 585	927	658	
EU-5	Of which defaulted	0050	323	1 585			

EU CRD – Qualitative disclosure requirements related to standardised approach

Legal basis	Row number	Details
Article 444 (a) CRR	a)	The Bank performs a quarterly review of the current creditworthiness assessments available on the authorized websites of three external creditworthiness institutions (ECAI), ie Fitch Ratings, Moody's Investors Service and Standard and Poor's Ratings Services. The Bank assigns a resultant rating for each counterparty / country, in accordance with Art. 138 - 141 CRR, based on all available credit assessments of the above-mentioned ECAIs. The Bank uses the current assessments in the process of calculating the capital requirement for credit risk.
Article 444 (b) CRR	b)	The Bank assigns risk weights in accordance with the information on ratings external to the risk classes specified in Art. 114 (Exposures to central governments or central banks), Art. 116 (Exposures to public sector entities), Art. 120 (Exposures to institutions with a rating), Art. 121 (Exposures to unrated institutions) and Art. 122 (Exposures to enterprises).
Article 444 (c) CRR	c)	The Bank applies the risk weighting process specified in Article 138 letters d, e and f of the CRR Regulation.
Article 444 (d) CRR	d)	The Bank uses the standard mapping system published by the EBA.

EU CR4 – Standardised approach – Credit risk exposure and CRM effects

PLN m

			Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWEAs and RWEAs density	
			On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEAs	RWEAs density (%)
			a	b	c	d	e	f
			0010	0020	0030	0040	0050	0060
1	Central governments or central banks	0010	28 465		33 332	472	1 825	5.40%
2	Non-central government public sector entities	0020	1	69		27	13	48.15%
EU 2a	Regional governments or local authorities	0030		3		1		
EU 2b	Public sector entities	0040	1	66		26	13	50.00%
3	Multilateral development banks	0050	625		625			
EU 3a	International organisations	0060						
4	Institutions	0070	2 176	26	1 546	11	340	21.84%
5	Covered bonds	0080						
6	Corporates	0090	5 018	7 827	4 042	3 452	6 978	93.11%
6.1	Of which: Specialised Lending	0100	616	358	610	304	860	94.09%
7	Subordinated debt exposures and equity	0110	278		278		685	246.40%
EU-7a	Subordinated debt exposures	0120						
EU 7b	Equity	0130	278		278		685	246.40%
8	Retail	0140	28 687	2 721	26 396	418	18 729	69.84%
9	Secured by mortgages on immovable property and ADC exposures	0150	29 493	6 390	29 175	3 659	20 470	62.34%
9.1	Secured by mortgages on residential immovable property - non IPRE	0160	23 154	957	23 154	772	11 156	46.63%
9.2	Secured by mortgages on residential immovable property - IPRE	0170						
9.3	Secured by mortgages on commercial immovable property - non IPRE	0180	3 639	1 572	3 354	954	3 321	77.09%
9.4	Secured by mortgages on commercial immovable property - IPRE	0190	1 153	153	1 131	77	905	74.92%
9.5	Acquisition, Development and Construction (ADC)	0200	1 547	3 708	1 536	1 856	5 088	150.00%
10	Exposures in default	0210	2 241	59	1 547	22	1 854	118.16%
EU-10a	Claims on institutions and corporates with a short-term credit assessment	0220						
EU 10b	Collective investment undertakings (CIU)	0230						
EU 10c	Other items	0240	2 589		2 589		1 709	66.01%
11	not applicable	0250						
12	TOTAL	0260	99 573	17 092	99 530	8 061	52 603	48.89%

EU CR5 – Standardised approach

PLN m

			Risk weight																							Total	Of which unrate					
			0	0.02	0.04	0.1	0.2	0.3	0.35	0.4	0.45	0.5	0.6	0.7	0.75	0.8	0.9	1	1.05	1.1	1.3	1.5	2.5	3.7	4	12.5	Inne					
			a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	Z	aa			
			0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	0120	0130	0140	0150	0160	0170	0180	0190	0200	0210	0220	0230	0240	0250	0260	0270			
1	Central governments or central banks	0010	32 597		384		109																715						33 805			
2	Non-central government public sector entities	0020					1					27																		28		
EU 2a	Regional governments or local authorities	0030					1																							1		
EU 2b	Public sector entities	0040										27																		27		
3	Multilateral development banks	0050	625																											625		
EU 3a	International organisations	0060																														
4	Institutions	0070			699		144	628				34						2					51							1 558		
5	Covered bonds	0080																														
6	Corporates	0090	21															7 195			274	4								7 494		
6.1	Of which: Specialised Lending	0100															640				274									914		
7	Subordinated debt exposures and equity	0110																1				10	267							278		
EU-7a	Subordinated debt exposures	0120																														
EU 7b	Equity	0130																1				10	267							278		
8	Retail exposures	0140								181				26 529				102													26 812	
9	Secured by mortgages on immovable property and ADC exposures	0150					13 754						1 541	10 297		68	2 375				268	3 684						845		32 832		
9.1	Secured by mortgages on residential immovable property - non IPRE	0160					13 754							10 168			4													23 926		
9.1.1	no loan splitting applied	0170												6 530			2														6 532	
9.1.2	loan splitting applied (secured)	0180					13 754																								13 754	
9.1.3	loan splitting applied (unsecured)	0190												3 638			2														3 640	
9.2	Secured by mortgages on residential immovable property - IPRE	0200																														
9.3	Secured by mortgages on commercial immovable property - non IPRE	0210											1 541	129			2 371				268									4 309		

				Risk weight																							Total	Of which unrate		
				0	0.02	0.04	0.1	0.2	0.3	0.35	0.4	0.45	0.5	0.6	0.7	0.75	0.8	0.9	1	1.05	1.1	1.3	1.5	2.5	3.7	4	12.5	Inne		
				a	b	c	d	e	f	q	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	Z	aa
				0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	0120	0130	0140	0150	0160	0170	0180	0190	0200	0210	0220	0230	0240	0250	0260	0270
9.3.1		no loan splitting applied	0220												82			1 763			265								2 110	
9.3.2		loan splitting applied (secured)	0230									1 541																	1 541	
9.3.3		loan splitting applied	0240											47			608				3								658	
9.4		Secured by mortgages on commercial immovable property - IPRE	0250														68					292					845	1 205		
9.5		Acquisition, Development and Construction (ADC)	0260																			3 392							3 392	
10	Exposures in default		0270															998				571							1 569	
EU-10a	Claims on institutions and corporates with a short-term credit assessment		0280																											
EU 10b	Collective investment undertakings (CIU)		0290																											
EU 10c	Other items		0300	881														1 709											2 590	
11	not applicable		0310																											
EU 11c	TOTAL		0320	34 124		1 083		14 008	628			181	61	1 541		36 826		68	12 382		542	4 320	982				848	107 594		

EU CCRA – Qualitative disclosure related to CCR

Legal basis	Row number	Details
Article 439 (a) CRR	a)	<p>The exposure value is determined in accordance with the principles of calculating the capital requirement for counterparty credit risk using the standardized approach for counterparty credit risk in accordance with Title II of Part Three of the CRR. The balance sheet equivalent of off-balance sheet transactions as well as the balance sheet equivalent of repo transactions are determined in accordance with the CRR Regulation.</p> <p>Credit risk related to derivative instruments operating on the interbank market is minimized by setting and monitoring the limits available for individual types of transactions for selected banks.</p> <p>Credit risk resulting from the provision of derivatives to business customers who are not banks is accepted and limited to the amount of treasury limits held by these customers. According to the definition in force at the Bank, the treasury limit is understood as the amount of the potential credit loss that may occur as a result of the client's use of derivative instruments. The treasury limit is part of the total credit limit for working capital exposures set for clients. It is approved based on the client's creditworthiness, tested according to the standards in force at the Bank. An additional element in the decision to grant a treasury limit to the client is the recognition of his knowledge and experience in the use of derivatives and knowledge of financial markets.</p> <p>The CCP limit is set in order to limit the Bank's loss resulting from the potential insolvency of the Central Counterparty. Transactions cleared under the CCP are excluded from the counterparty's limits.</p> <p>Due to the lack of credit risk of the intermediary entity (clearing broker) in the clearing of transactions with the CCP, the transactions are settled within the designated CCP limit. The bank does not set a separate limit for the broker.</p>
Article 439 (b) CRR	b)	<p>Business Customers can secure limits in accordance with the catalog of collateral accepted by the Bank. The Bank may offer treasury limits without collateral to the best business clients. The treasury limit is not offered to individual clients.</p>
Article 439 (c) CRR	c)	<p>The Alior Bank Group does not identify any significant exposure to the risk of unfavorable correlation (the probability of default by counterparties is positively correlated with general market risk factors), and its level is monitored on an ongoing basis.</p>
Article 431 (3) and (4) CRR	d)	<p>The aim of the Bank's activities is to minimize the actual or potential risk of losses that may be incurred by the Bank as a result of improper provision of financial services, including willful misconduct or negligence. In terms of counterparty risk, the Bank's goal is to provide customers with basic treasury products supporting the management of risk related to their business (hedging objective) and to reduce the credit risk of concluded treasury transactions.</p>
Article 439 (d) CRR	e)	<p>The level of collateral that the Bank is obliged to provide depends as a standard on the level of the current valuation of transactions concluded under a given agreement. At the same time, the Bank has not concluded any agreement under which the counterparty would be entitled to demand the establishment of additional collateral in the event of a change in the assessment of creditworthiness. The amount of security that the Bank would have to provide if its credit rating was lowered is 0.</p>

EU CCR1 – Analysis of CCR exposure by approach

PLN m

			Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
			a	b	c	d	e	f	g	h
			0010	0020	0030	0040	0050	0060	0070	0080
EU -1	EU - Original Exposure Method (for derivatives)	0010				1.4				
EU -2	EU - Simplified SA-CCR (for derivatives)	0020				1.4				
1	SA-CCR (for derivatives)	0030	99	165		1.4	370	370	370	237
2	IMM (for derivatives and SFTs)	0040								
2a	Of which securities financing transactions netting sets	0050								
2b	Of which derivatives and long settlement transactions netting sets	0060								
2c	Of which from contractual cross-product netting sets	0070								
3	Financial collateral simple method (for SFTs)	0080								
4	Financial collateral comprehensive method (for SFTs)	0090								
5	VaR for SFTs	0100								
6	Total	0110					370	370	370	237

EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights

PLN m

			Risk weight									Total exposure value		
			0	0.02	0.04	0.1	0.2	0.5	0.7	0.75	1		1.5	Other
			a	b	c	d	e	f	g	h	i		j	k
			0010	0020	0030	0040	0050	0060	0070	0080	0090		0100	0110
1	Central governments or central banks	0010												
2	Regional government or local authorities	0020												
3	Public sector entities	0030												
4	Multilateral development banks	0040												
5	International organisations	0050												
6	Institutions	0060				67	2				7	1 998	2 074	
7	Corporates	0070								196			196	
8	Retail	0080												
9	Institutions and corporates with a short-term credit assessment	0090												
10	Other items	0100												
11	Total exposure value	0110				67	2			196	7	1 998	2 270	

EU CCR5 – Composition of collateral for CCR exposures

PLN m

		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
		a	b	c	d	e	f	g	h
Collateral type		0010	0020	0030	0040	0050	0060	0070	0080
1	Cash – domestic currency	0010							
2	Cash – other currencies	0020							
3	Domestic sovereign debt	0030							
4	Other sovereign debt	0040							
5	Government agency debt	0050							
6	Corporate bonds	0060							
7	Equity securities	0070							
8	Other collateral	0080							
9	Total	0090							

The Alior Bank S.A. Capital Group as at 31 December 2025 it does not consider contractual netting as reducing counterparty credit risk, therefore it does not include received and submitted collateral in the calculation of the exposure value due to derivative transactions.

EU CCR6 – Credit derivatives exposures

PLN m

		Protection bought		Protection sold	
		a		b	
		0010		0020	
Notionals		0009			
1	Single-name credit default swaps	0010			
2	Index credit default swaps	0020			
3	Total return swaps	0030			
4	Credit options	0040			
5	Other credit derivatives	0050			
6	Total notionals	0060			
Fair values		0069			
7	Positive fair value (asset)	0070			
8	Negative fair value (liability)	0080			

As at 31 December 2025, the Alior Bank SA Group did not have exposure to credit derivatives.

EU CCR8 – Exposures to CCPs

PLN m

		Exposure value		RWEA	
		a		b	
		0010		0020	
1	Exposures to QCCPs (total)	0010			567
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	0020	1 888		566
3	(i) OTC derivatives	0030	1 888		566
4	(ii) Exchange-traded derivatives	0040			
5	(iii) SFTs	0050			
6	(iv) Netting sets where cross-product netting has been approved	0060			
7	Segregated initial margin	0070	540		
8	Non-segregated initial margin	0080			
9	Prefunded default fund contributions	0090	21		
10	Unfunded default fund contributions	0100			
11	Exposures to non-QCCPs (total)	0110			
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	0120			
13	(i) OTC derivatives	0130			
14	(ii) Exchange-traded derivatives	0140			
15	(iii) SFTs	0150			
16	(iv) Netting sets where cross-product netting has been approved	0160			
17	Segregated initial margin	0170			
18	Non-segregated initial margin	0180			
19	Prefunded default fund contributions	0190			
20	Unfunded default fund contributions	0200			

EU SECA – Qualitative disclosure requirements related to securitisation exposures

Legal basis	Row number	Details
Article 449 (a) CRR	a)	As at 31 December 2025, the Bank did not maintain any securitization positions. The 2019 securitization transaction agreement with European Investment Fund (EIF) investors and the European Investment Bank (EIB) as counter-guarantor was terminated in the fourth quarter of 2021 by termination by the Bank.
Article 449 (b) CRR	b)	
Article 449 (c) CRR	c)	
Article 449 (d) CRR	d)	
Article 449 (e) CRR	e)	
Article 449 (f) CRR	f)	Therefore, the remaining information does not apply to the Bank.
Article 449 (g) CRR	g)	
Article 449 (h) CRR	h)	
Article 449 (i) CRR	i)	

EU MRA – Qualitative disclosure requirements related to market risk

Legal basis	Row number	Details
Points (a) and (d) of Article 435 (1) CRR	a)	<p>The aim of market risk management is to strive to significantly reduce the volatility of the result and changes in the economic value of equity by shaping the optimal, in terms of profitability and potential impact on the economic value of equity, the structure of assets and liabilities.</p> <p>The goals are achieved through:</p> <ul style="list-style-type: none"> maintaining a stable level of market risk measures and limits, determining the system of limits based on the risk appetite and the Bank's strategy, a fund transfer rate system that adequately takes into account the management of market risk. <p>The following types of market risk have been identified in the Bank and are subject to management:</p> <ul style="list-style-type: none"> interest rate risk in the banking book, market risk in the trading book (including interest rate risk in the trading book, currency risk and commodity price risk). <p>The Bank distinguishes the following market risk factors:</p> <ul style="list-style-type: none"> exchange rates, interest rate indices, stock / index prices, prices of goods, credit spread related to the rating of a given issuer, options volatility parameters.

Legal basis	Row number	Details
		<p>Interest rate risk</p> <p>The Bank pursues a policy of limiting the risk in the trading book and at the same time puts emphasis on the interest rate risk in the banking book, i.e.:</p> <ul style="list-style-type: none"> • the risk of mismatch between repricing dates, • basis risk, i.e. the impact of non-parallel changes in various reference indices with similar repricing dates on the Bank's result, • customer option risk, • credit spread risk (CSRBB). <p>The main interest rate risk management tools at Alior Bank are:</p> <ul style="list-style-type: none"> • internal procedures for managing interest rate risk, • interest rate risk measures, i.e. NII, EVE, Expected Shortfall, BPV, repricing gap, • limits and warning thresholds for individual measures of interest rate risk, • stress tests (including scenario analysis covering, among others, the impact of specific changes in interest rates on future interest income and the economic value of capital and reverse stress tests). <p>Foreign exchange risk (FX risk)</p> <p>The main objective of currency risk management is to identify areas of the Bank's operations that may be exposed to currency risk and to take measures to minimize possible losses incurred on this account. The Bank's Management Board specifies the Bank's FX risk profile, which must be consistent with the Bank's applicable financial plan.</p> <p>The main currency risk management tools at Alior Bank are:</p> <ul style="list-style-type: none"> • internal procedures related to currency risk management, • internal models and measures of currency risk, • limits and threshold values for currency risk, • restrictions on allowed currency transactions, • stress tests and reverse stress tests. <p>Portfolio models</p> <p>The Bank manages structural risk, which cannot be fully determined in a deterministic manner and the quantification of which requires the Bank to adopt certain assumptions, based on:</p> <ul style="list-style-type: none"> • the concept of a replication portfolio of deposits, • the concept of securing equity capital. <p>The assumptions for model portfolios are approved by the CALCO Committee, which exercises regular supervision over them.</p> <p>Hedge accounting</p> <p>Implementing the adopted risk management policy and within the applicable risk limits, the Bank may apply hedge accounting in accordance with applicable law and accounting standards (IAS/IFRS). The Bank may use hedge accounting as long as it expects high effectiveness and efficiency of the hedge and can reliably assess it (through quantitative or qualitative research). The effectiveness of the hedge should be tested periodically, not less frequently than on the date of preparing the interim financial statements.</p>
<p>Point (b) of Article 435 (1) CRR</p>	<p>b)</p>	<p>The Bank has a clear division of competences in the area of market risk management, including:</p> <ul style="list-style-type: none"> • concluding treasury transactions with non-banking customers and financial institutions, • concluding transactions with bank customers as well as with some financial institutions, • offering the Bank's customers structured products and concluding transactions securing the risk related to these products, • concluding transactions as part of brokerage activities in the field of purchasing or selling financial instruments and the settlement of these transactions,

Legal basis	Row number	Details
		<ul style="list-style-type: none"> • measurement, monitoring and reporting of market risk, including the method of implementing the market risk management policy, • the transaction settlement process. <p>Supervision over the above-mentioned activities related to the conclusion of transactions, independent measurement and reporting of risk at the Bank has been distributed to the level of a Management Board Member, which guarantees full independence of their operations. The organizational structure and the division of competences have been defined by the Bank's Management Board in the Organizational Regulations of the Head Office. The Supervisory Board, the Management Board of the Bank and the CALCO Committee also play an active role in the market risk management process.</p> <p>Market risk measurement is carried out at the Bank by the Financial Risk Management Department (DZRF) in a manner that is completely independent of the Bank's organizational units responsible for concluding transactions.</p> <p>Subsidiaries deemed significant are required to have internal regulations regarding market risk management, including monitoring, controlling and reporting (including to the Bank for consolidation purposes) market risk.</p> <p>The assessment of the market risk management process in all areas of the Bank's operations and in the Bank's organizational units responsible for market risk management is carried out by the Audit Department.</p>
<p>Point (c) of Article 435 (1) CRR</p>	<p>c)</p>	<p>The Bank regularly monitors and reports:</p> <p>in terms of interest rate risk:</p> <ul style="list-style-type: none"> • the level of interest rate risk measures, • the degree of utilization of the internal capital allocated to the interest rate risk, • the degree of use of internal limits and threshold values for the interest rate risk, • stress test results. <p>Reports on interest rate risk are prepared on a daily, weekly, monthly and quarterly basis.</p> <p>in terms of currency risk:</p> <ul style="list-style-type: none"> • the level of currency risk measures, • the degree of use of internal limits and threshold values for currency risk, • stress test results. <p>Reports on currency risk are prepared on a daily, weekly, monthly and quarterly basis.</p> <p>The currency risk limits are set in such a way that the risk is kept at a limited level.</p>
<p>Article 445 paragraph 1 of the CRR</p>	<p>EU d)</p>	<p>The following are allocated to the trading portfolio:</p> <ul style="list-style-type: none"> • positions in financial instruments and commodities that the Bank holds for trading or for hedging trading positions, • positions held for resale in the short term (usually no longer than 12 months), • positions intended to generate benefits related to actual or expected short-term differences between purchase and sale prices or other types of price or market fluctuations, • operations performed to reduce the risk arising from the operations referred to above. <p>Within the above-mentioned positions, the Bank's trading portfolio includes standard financial instruments with a relatively simple risk profile.</p>

EU MR1 – Market risk under the standardised approach (ASA)

PLN m

			RWEAs
			0010
	Outright products	0009	
1	Interest rate risk (general and specific)	0010	234
2	Equity risk (general and specific)	0020	
3	Foreign exchange risk	0030	
4	Commodity risk	0040	123
	Options	0049	
5	Simplified approach	0050	
6	Delta-plus approach	0060	
7	Scenario approach	0070	
8	Securitisation (specific risk)	0080	
9	Total	0090	357

EU CVAA – Qualitative disclosure requirements related to credit valuation adjustment risk

Legal basis	Row number	Details
Point (a) of Article 445a(1) CRR	a)	<p>The Bank manages the risk of derivative valuation adjustments due to counterparty credit risk as part of its credit risk management framework.</p> <p>The Bank uses its internal systems to flag transactions of entities subject to CVA risk and calculates and monitors the level of own funds requirements for CVA risk on a monthly basis.</p> <p>The Bank does not use hedging in calculating own funds requirements for CVA risk.</p>
Point (b) of Article 445a(1) CRR	b)	The Bank does not meet all the conditions specified in Article 273a paragraph 2.

EU CVA 1 – Credit valuation adjustment risk under the Reduced Basic Approach

PLN m

			Components of Own Funds Requirements	Own funds requirements
			a	b
			0010	0020
1	Aggregation of systematic components of CVA risk	0010	6	
2	Aggregation of idiosyncratic components of CVA risk	0020	2	
3	Total	0030		2

EU CVAB – Qualitative disclosure requirements related to CVA risk for institutions using the Standardised Approach

Legal basis	Details
Point (a) of Article 445a(2) CRR	Article 445a paragraph 2 letter a) of the CRR does not apply to the Bank due to the fact that the Bank does not apply Article 383 of the CRR to calculate own funds requirements for CVA risk.

EU IRRBBA – Qualitative information on interest rate risks of non-trading book activities

Legal basis	Row number	Details
Article 448(1), point (e)	a)	The interest rate risk in the banking book is understood in accordance with the EBA guidelines (EBA/GL/2022/14).
Article 448(1), point (f)	b)	The aim of risk management in the Group is to achieve strategic goals by maintaining the risk level of the Group's operations within the adopted risk appetite level. When managing risk, the Group ensures early identification and adequate management of all significant types of risk related to the Group's operations.
Article 448(1), points (e) (i) and (v); Article 448(2)	c)	IRRBB measures are determined on a daily, monthly, quarterly and annual basis. The main measures of IRRBB are: <ul style="list-style-type: none"> • EVE (daily sensitivity of the Bank's capital to changes in interest rates), • NII (daily sensitivity of the Bank's net interest income to changes in interest rates, including sensitivity plus change in valuation of financial instruments), • BPV (price sensitivity of the portfolio, band, currency, instrument, accounting category) to a change in interest rates by 1 bp, • basis risk and CSRBB measures (exposure to basis risk and CSRBB), • dynamic forecasts of IRRBB measures (forecasts of the risk level), • IRRBB Stress Tests (TWS IRRBB program according to EBA guidelines) along with reverse stress tests.
Article 448(1), point (e) (iii); Article 448(2)	d)	The scenarios used by the Bank in terms of EVE and NII measures include: <ul style="list-style-type: none"> • 6 scenarios set out in the EBA guidelines (EBA/GL/2022/14) and the regulations delegated to these guidelines, • 4 scenarios of parallel shifts of interest rate curves, • 3 internal scenarios determined by business stress tests.
Article 448(1), point (e) (ii); Article 448(2)	e)	The bank does not apply different assumptions.
Article 448(1), point (e) (iv); Article 448(2)	f)	The Bank secures the interest rate risk by: <ul style="list-style-type: none"> • active policy in the field of shaping deposit and credit products, • adopting and implementing an IRRBB structural risk management policy, • applying hedge accounting for deposits without a specified maturity date and the Bank's equity, • securing positions as part of Treasury's business.
Article 448(1), point (c); Article 448(2)	g)	The assumptions used by the Bank are set out in the EBA guidelines (EBA/GL/2022/14).
Article 448(1), point (d)	h)	The risk measures used at the Bank are consistent with the EBA guidelines (EBA/GL/2022/14), especially with regard to the economic sensitivity of capital (EVE). The Bank uses the scenarios

Legal basis	Row number	Details
		specified in the guidelines as well as the parameters and assumptions specified therein. The second important measure is the sensitivity of the Bank's net interest income to changes in interest rates (NII). The assumptions of NII are the same as for EVE. NII is calculated on a straight-line basis, without taking into account any optionality, and in a realistic variant, the purpose of which is to take into account any restrictions on the level of interest rates of individual products. The Bank also estimates the NII measure using the assumptions specified in the supervisory outlier test, i.e., the SOT NII. The assumptions for these measures have not been modified over the past year, and changes in their levels are the result of the Bank's policy to reduce sensitivity and rising interest rates.
Article 448(1), point (g)	(1) (2)	The Bank, in accordance with the provisions of internal regulations, uses an average revaluation term of no more than 5 years.

EU IRRBB1 – Interest rate risks of non-trading book activities

PLN m

			Changes of the economic value of equity		Changes of the net interest income	
			Current period	Last period	Current	Last period
			a	b	c	d
Supervisory shock scenarios			0010	0020	0030	0040
1	Parallel up	0010	-1061	-427	-139	-11
2	Parallel down	0020	453	50	-434	-329
3	Steeper	0030	211	229		
4	Flattener	0040	-647	-539		
5	Short rates up	0050	-937	-615		
6	Short rates down	0060	-460	-321		

EU ORA – Qualitative information on operational risk

Legal basis	Row number	Details
Points (a) of Article 446 and (a) of Article 435(1) CRR	a)	The Bank has a formalized operational risk management system within which it prevents the occurrence of operational events and incidents and limits losses in the event of risk materialization. Operational risk management includes identification, measurement and assessment of operational risk, control, monitoring, reporting and management activities. Operational risk management in The Alior Bank SA Capital Group is supported by a dedicated IT system in which, among others, operational events and losses are registered, KRI and the results of scenario analyzes and self-assessment are recorded. The operational risk self-assessment process is performed in JIRA.
Points (a) of Article 446 and (b) of Article 435(1) CRR	b)	The operational risk management strategy is included in the regulation Risk Management Strategy of the Alior Bank SA Capital Group approved at the level of the Supervisory Board. The principles of operational risk management, including roles and responsibilities, taking into account the active involvement of the Supervisory Board, Management Board and committees of the Bank, are set out in the Operational Risk Management Policy at Alior Bank SA (approved at the level of the Supervisory Board).
Points (a) of Article 446 and (c) of Article 435(1) CRR	c)	For the purposes of determining own funds requirements for operational risk for Alior Bank S.A. and at the consolidated level of the Alior Bank S.A. Capital Group, the new Standardised Approach (SMA) is used, in accordance with the guidelines of Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 with regard to requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the

Legal basis	Row number	Details
		<p>minimum capital threshold, as amended (Resolution No. 459/2024 of the Management Board of Alior Bank S.A. of 30 December 2024).</p> <p>Internal capital for operational risk is measured using the results of the internal model.</p>
<p>Points (a) of Article 446 and (c) of Article 435(1) CRR</p>	<p>d)</p>	<p>Operational risk measurement and assessment are conducted using quantitative and qualitative metrics and include:</p> <ul style="list-style-type: none"> • determining capital requirements for operational risk for Alior Bank S.A. and, at the consolidated level of the Alior Bank S.A. Capital Group, the new Standardized Approach (SMA) is used, • estimating the Bank's internal capital for operational risk using the results of the internal model, • scenario analyses, • self-assessment of operational risk for products, processes, systems, contracts, and business reports, • setting an internal target and limit for operational risk costs, • determining the level of utilization of the target and limit for operational risk costs, • setting business targets for operational risk costs, • KRIs, • valuation of actual and potential losses associated with identified operational events, • conducting Stress Tests.
<p>Points (a) of Article 446 and (d) of Article 435(1) CRR</p>	<p>e)</p>	<p>The Alior Bank S.A. Capital Group, seeking to mitigate the risk of rare but potentially severe operational events, purchased a number of insurance policies. These policies included, among others, property (including electronic equipment), third-party liability, fiscal criminal liability, and professional liability. Operational recoveries from insurance or reinsurance policies do not affect the regulatory requirement for operational risk determined using the new standardized approach (SMA).</p>

Recommendation M – concerning operational risk management in banks

Legal basis	Details
Recommendation M	<p>Operational risk management at the Alior Bank S.A. Capital Group is supported by a dedicated IT system that records operational events and losses, KRIs, and the results of scenario analyses and self-assessments. The self-assessment process is performed in JIRA.</p> <p>The gross operational risk costs at the Alior Bank S.A. Capital Group for 2025 amounted to PLN 54.7 million.</p> <p>The largest share of gross operational risk costs was in the "Customers, Products, and Operating Practices" category. Costs incurred in this category were primarily related to litigation costs related to foreign currency mortgage loans.</p>

Operating risk costs in the Alior Bank SA Group in 2025 by category:

PLN m

Kategoria straty	Koszty ryzyka operacyjnego
Internal fraud	1
External fraud	6
Employment Policy and Workplace Safety	
Clients, Products, and Operating Practices	41
Damage related to tangible assets	
Bank disruptions and system failures	
Execution of transactions, delivery and management of operational processes	7
Total amount	55

EU OR1 – Operational risk own funds requirements and risk-weighted exposure amounts

PLN m

		2025	2024	2023	2022	2021	2020	2019	2018	2017	2016	Ten-year average	
		a	b	c	d	e	f	g	h	i	j	k	
		0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	
Using €20,000 threshold		0010											
1	Total amount of operational risk losses net of recoveries (no exclusions)	0020	48	62	21	38	12	10	19	28	4	12	26
2	Total number of operational risk losses	0030											
3	Total amount of excluded operational risk losses	0040											
4	Total number of excluded operational risk events	0050											
5	Total amount of operational risk losses net of recoveries and net of excluded losses	0060	48	62	21	38	12	10	19	28	4	12	26
Using €100,000 threshold		0070											
6	Total amount of operational risk losses net of recoveries (no exclusions)	0080	28	42	11	26	6	8	10	23	2	8	16
7	Total number of operational risk losses	0090											
8	Total amount of excluded operational risk losses	0100											
9	Total number of excluded operational risk events	0110											
10	Total amount of operational risk losses net of recoveries and net of excluded losses	0120	28	42	11	26	6	8	10	23	2	8	16
Details of operational risk capital calculation		0130											
11	not applicable	0140											
12	not applicable	0150											
13	not applicable	0160											

EU OR2 – Business Indicator, components and subcomponents

PLN m

			2025	2024	2023	Average value	Disclosure on the BI:
			a	b	c	d	a
			0010	0020	0030	0040	0050
1	Interest, lease and dividend component (ILDC)	0010				2 152	
EU 1	ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3))	0020				2 152	
1a	Interest and lease income	0030	6 958	7 336	7 454		
1b	Interest and lease expense	0040	-1 784	-2 051	-2 625		
1c	Total assets/Asset component	0050	101 363	93 396	91 044		
1d	Dividend income/ dividend component	0060	8	5	11		
2	Services component (SC)	0070				1 681	
2a	Fee and commission income	0080	1 804	1 334	1 196		
2b	Fee and commission expense	0090	-1 784	-1 334	-1 267		
2c	Other operating income	0100	89	68	67		
2d	Other operating expense	0110	179	212	267		
3	Financial component (FC)	0120				63	
3a	Net profit or loss applicable to trading book (TB)	0130	24	10	53		
3b	Net profit or loss applicable to banking book (BB)	0140	26	52	23		
EU 3c	Approach followed to determine the TB/BB boundary (PBA or accounting approach)	0150				eba_qAO:qx20 24-accounting approach	
4	Business Indicator (BI)	0160				3 896	
5	Business indicator component (BIC)	0170				467	
6a	BI gross of excluded divested activities	0180					3 896
6b	Reduction in BI due to excluded divested activities	0190					
EU 6c	Impact in BI of mergers/acquisitions	0200					

EU OR3 – Operational risk own funds requirements and risk exposure amounts

PLN m

			Amount
			a
			0010
1	Business Indicator Component (BIC)	0010	467
EU 1	Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4)	0020	
2	<i>Not applicable</i>	0030	
3	Minimum Required Operational Risk Own Funds Requirements (OROF)	0040	467
4	Operational Risk Exposure Amounts (REA)	0050	5 843

EU REMA – Remuneration policy

Legal basis	Row number	Details
Points (a), (b) and(c) of Article 450(1) CRR	a)	<p>The Remuneration Policy in force at the Bank ("Policy"), which covers all employees, is the basic document regarding the policy and principles of shaping the remuneration of the Bank's employees, with particular emphasis on the principles of remunerating employees who, due to their specific role in the management system, the Bank's risk, were subject to a separate regulatory regime in this respect, i.e.:</p> <ul style="list-style-type: none"> • persons having a significant influence on the Risk Profile (MRT), including the Management Board, • persons performing control functions, • employees of the Compliance Department and the Audit Department, • employees involved in offering or distributing banking, investment and insurance products and services or employees of the Brokerage House indirectly involved in providing investment or additional services, including those involved in handling complaints.

The Nomination and Remuneration Committee of the Supervisory Board was established at the Bank, which is an advisory committee reporting to the Supervisory Board. The main purpose of the Remuneration Policy Committee is to advise the Supervisory Board and the Management Board of the Bank on the implementation of the provisions of the "Remuneration Policy of Alior Bank S.A." and the "Remuneration Policy for Members of the Management Board and Supervisory Board of Alior Bank S.A." ("Remuneration Policy") – in relation to Persons Having an Influence on the Bank's Risk Profile ("MRTs").

The tasks of the Nomination and Remuneration Committee, in this substantive scope, include in particular:

- issuing opinions on Remuneration Policies, while maintaining the principles of prudent and stable risk, capital, and liquidity management, and with particular attention to the long-term interests of the Bank and the interests of the Bank's shareholders,
- issuing opinions on the MRT List, including its updates,
- issuing opinions on the MRT objectives,
- assessing work performance and making recommendations regarding the award of Variable Remuneration to MRTs,
- assessing the MRTs' achievement of their performance targets and the need for ex-post risk adjustments.

In 2025, the Nomination and Remuneration Committee held 11 meetings.

Moreover, in 2025, the Bank commissioned external consultants to prepare an opinion assessing the justification for applying an adjustment to the variable remuneration of selected MRTs for previous years.

The Bank obliges its subsidiaries to implement and apply the provisions of the Remuneration Policy

Legal basis	Row number	Details
		<p>in relation to Persons Having a Significant Impact on the Risk Profile identified in the subsidiaries, appropriately to the legal form in which the company operates, the size of its operations, the risks associated with its business, its internal organization, and the nature, scope, and complexity of its business. The remuneration policy in the Bank's subsidiaries should be consistent with the principles set out in the Remuneration Policy, taking into account the type of business conducted by these entities.</p>
<p>Points (a), (b) and(c) of Article 450(1) CRR</p>	<p>b)</p>	<p>Policy Objectives:</p> <ul style="list-style-type: none"> • promoting proper and effective risk management and discouraging excessive risk-taking (exceeding the acceptable level of risk at the Bank) in order to maintain a solid capital base and bearing in mind the long-term interest of the Bank, its shareholders and customers, • supporting the implementation of the Bank's strategy regarding sustainable development and prudent risk management policy, • limiting conflict of interests, • maintaining a transparent relationship between individual results and individual remuneration by focusing on goals related to responsibility and real impact, • preventing the use of structures or methods aimed at avoiding the application of this Policy, • ensuring that the Bank's employees act in the best interests of their clients, including providing them with clear and transparent information regarding the services and products offered by the Bank and not favoring their own interests or the interests of the Bank to the detriment of the legitimate interests of clients. <p>The Remuneration Policy is gender neutral.</p> <p>In achieving the above objectives, the role of the Policy in relation to MRT is special.</p> <p>The policy is subject to an annual review of its validity and adequacy, and if it needs to be updated, it is reviewed by the Nomination and Remuneration Committee and adopted by the Bank's Management Board and approved by the Supervisory Board.</p> <p>In order to adjust the Variable Remuneration to the Bank's risk profile, achieved individual results and the Bank's results, as well as to ensure compliance with the principle of not rewarding poor performance, the Bank adopts mechanisms for prior assessment (ex ante) and subsequent adjustment (ex post) of the Variable Remuneration.</p> <p>In accordance with the current Remuneration Policy:</p> <ul style="list-style-type: none"> • guaranteed variable remuneration components are exceptional in nature and only occur upon the commencement of an employment relationship or conclusion of another contract constituting the basis for performing a function and are limited to the first year of employment or performing a function, • severance pay for termination of an employment contract for reasons not attributable to the Employees arising from legal provisions or internal labor law acts in force at the Bank, compensation or severance pay specified in an agreement concluded with the Employee in order to avoid the need to resolve the case in court, severance pay or compensation awarded by a court judgment are Fixed Remuneration.
<p>Points (c) of Article 450(1) CRR</p>	<p>c)</p>	<p>Ex-ante assessment mechanisms are used before awarding Variable Remuneration for a given MRT Assessment Period to align this remuneration with all current and future risks associated with the Bank's operations. These mechanisms include, in particular:</p> <ul style="list-style-type: none"> • each time an assessment is made of whether the Variable Remuneration reflects the Bank's results and the level of achievement of the objectives by the individual, • each time a risk measurement is made, taking into account risk mitigation measures to maintain the desired risk profile (defining and assessing the implementation of the risk appetite accepted by the Supervisory Board),

Legal basis	Row number	Details
		<ul style="list-style-type: none"> • risk assessment taking into account both quantitative and qualitative risk adjustments, including compliance risk, • taking into account the cost of capital and avoiding situations in which the acquisition of the right to Variable Remuneration and the payment of this remuneration, both deferred and non-deferred, would limit the possibility of strengthening regulatory capital, the solvency ratio, and equity below regulatory requirements. <p>Ex-post adjustment mechanisms for Deferred Remuneration or Non-Cash Remuneration (in particular, retention) are applied before the final determination of the amount of Variable Remuneration due or its payment (including the payment of Variable Remuneration subject to Retention or Deferred Remuneration) to ensure that MRTs are compensated taking into account long-term performance and the effects of past decisions.</p> <p>Deferred Remuneration may be subject to reduction in the form of a given MRT not acquiring the right to part or all of it if the Supervisory Board, in relation to members of the Management Board (and former members of the Management Board for the period in which they held the position) and the Director of the Audit Department and the Director of the Compliance Department (and persons who held this position in the past for the period in which they held the position), or the Management Board, in relation to other MRTs, determines that during a given Assessment Period the Person concerned:</p> <ul style="list-style-type: none"> • participated in activities that resulted in significant losses for the Bank or was responsible for such activities, • failed to meet appropriate standards regarding the safe and prudent management of the Bank, • knowingly participated in the provision of materially incorrect information regarding the Bank's financial statements.
<p>Points (b), (c) and(d) of Article 450(1) CRR</p>	<p>d)</p>	<p>The main points of the Policy in relation to the MRT:</p> <ul style="list-style-type: none"> • remuneration consisting of fixed remuneration and variable remuneration, • not granting MRT unspecified retirement benefits, • a commitment by MRT not to use individual hedging strategies or remuneration and liability insurance to undermine the effects of risk recognition in the remuneration system applicable to them, • with the exception of persons performing control functions, the basis for determining the total amount of variable remuneration is the assessment of the results of MRT and a given organizational unit and the results of the Bank in the area of responsibility of this person, taking into account the results of the entire Bank, • maximum ratio of MRT variable remuneration to fixed remuneration: 100%, • at least 50% of MRT's variable remuneration is an incentive to take special care of the long-term good of the Bank and consists of financial instruments linked to the Bank's shares; the remaining part of the variable remuneration is paid in cash as variable remuneration, • at least 40% of the MRT variable remuneration, and if the MRT variable remuneration is a particularly high amount, at least 60% of the variable remuneration is deferred remuneration, • the variable remuneration of the Management Board is adjusted to the provisions of the Act of June 9, 2016 on the principles of shaping the remuneration of persons managing certain companies.
<p>Points (e) and (f) of Article 450(1) CRR</p>	<p>e)</p>	<p>The Bank's results used to determine variable remuneration components take into account the Bank's cost of risk, cost of capital and liquidity risk in the long term. The results are assessed in three years so that the amount of variable remuneration takes into account the Bank's business cycle and the risk associated with the Bank's business activities. Financial and non-financial criteria are taken into account when assessing individual MRT performance. Financial criteria include, in particular, one or more of the following criteria: net result of the Bank or its capital group, return on capital,</p>

Legal basis	Row number	Details
		<p>capital adequacy ratios of the Bank, liquidity ratios of the Bank or its capital group, profitability ratios of the Bank or its capital group, other adopted in individual goals to be achieved for individual employees. Non-financial criteria include, in particular, one or more of the following criteria: the criterion of compliance with the principles of law and internal regulations, the criterion of durability of employment, the criterion of compliance assessment and risk assessment carried out in accordance with separate internal regulations, others adopted for individual purposes to be implemented for individual employees.</p> <p>In terms of the variable remuneration of MRTs, who are Members of the Bank's Management Board, variable remuneration is due to a given Member of the Management Board after the Management Board's report on the Bank's activities and the financial statements for the previous financial year have been approved and the General Meeting has granted such Member a vote of approval for the performance of his/her duties.</p> <p>With the exception of persons performing control functions, the basis for determining the total amount of Variable Remuneration is the assessment of the results of MRT and a given organizational unit and the results of the Bank in the area of responsibility of this person, taking into account the results of the entire Bank.</p> <p>Deferred Remuneration may be subject to reduction in the event that a given MRT does not acquire the right to part or all of it or its payment may be subject to suspension in a situation where there has been a significant deterioration in the Bank's financial results, resulting in a change in the assessment of the original circumstances for determining the Variable Remuneration, in particular the situation referred to in Article 142 section 1 of the Banking Law has occurred. The above provisions apply accordingly to the payment of Variable Remuneration subject to Retention. If the Bank benefits from state aid, in particular under the Act of 12 February 2009 on State Treasury Support for Financial Institutions (Journal of Laws of 2022, item 2506) or the Act of 12 February 2010 on the Recapitalization of Certain Institutions and on Government Financial Stabilization Instruments (Journal of Laws of 2022, item 396):</p> <ul style="list-style-type: none"> • in the event of a threat to meeting the own funds requirements specified in legal provisions and resulting from individual decisions concerning the Bank and the timely withdrawal of public support, variable remuneration components will be strictly limited to a percentage of net income, • The Bank will adjust the amount and components of remuneration to support proper risk management and long-term growth of the Bank's results, including introducing • limits on the remuneration of the Bank's Management Board, • variable remuneration components will be paid to members of the Bank's Management Board only in justified cases.
Points (f) of Article 450(1) CRR	f)	The retention period for non-cash Variable Remuneration is 12 months.
Points (f) of Article 450(1) CRR	g)	The description can be found in points d and e.
Points (j) of Article 450(1) CRR	h)	This disclosure of the Bank does not apply.
Points (k) of Article 450(1) CRR	i)	<p>The Bank uses the derogation specified in Art. 94 sec. 3 letter b) CRD pursuant to Art. 450 sec. 1 lit. k) CRR with regard to the rules set out in Art. 94 sec. 1 lit. l) and m) and point (o) the second subparagraph of that paragraph.</p> <p>As at the date of publication of this report, the variable remuneration for 2025 has not yet been awarded. This document will be modified to include the number of staff members benefiting from this derogation and the amount of variable remuneration for 2025, upon approval of the Remuneration Policy requirements.</p>

Legal basis	Row number	Details
Article 450(2) CRR	j)	In line with the requirements of Art. 433 and 433c of the CRR Regulation and taking into account the scale of operations under Art. 4 points 145 and 146 of the CRR Regulation, the Bank is not a large institution, therefore this disclosure of the Bank does not apply.

Guidelines EBA/GL/2022/06 and EBA/GL/2021/04

Legal basis	Point	Details
EUNB/GL/2021/04	Point 16	The Bank's remuneration policy is consistent with the Bank's business and risk strategy objectives, its corporate culture and values, long-term interests, and measures taken to prevent conflicts of interest. The remaining disclosure content is consistent with EU REMA within the scope of Article 450 paragraph 1 letters a), b), and c) of the CRR.
	Point 26	To monitor the application of its gender-neutral remuneration policy, the Bank conducts a job evaluation process in accordance with the Korn Ferry Hay Group methodology. During the evaluation process, a number of gender-neutral activities are performed, such as analyzing job descriptions, defining job families, and defining job classification categories. The determination of salary levels for a given position is consistent with the job classification system and is based on the same criteria for men and women, excluding any discrimination, including gender-based discrimination.
EBA/GL/2022/06	Point 52	The following data was calculated using the methodology for calculating indicators from Part 6 of the Guidelines of 30 June 2022 on benchmarking remuneration practices, the gender pay gap, and approved higher ratios of variable to fixed remuneration components under Directive 2013/36/EU (EBA/GL/2022/06). Exclusions were applied to the data analysis in accordance with EBA/GL/2022/06 Part 6, point 51, and to maintain consistency in the analyses, in accordance with the best efforts principle, employees working less than 0.4 full-time equivalents were excluded.
	Point 57	Below we present the data in a format consistent with Annex IV to EBA/GL/2022/06.

Table 1 – Representation of staff of different genders per quartile of remuneration level

Representation of male and female staff in each quartile of remuneration level	All male staff in percent of all staff	All female staff in percent of all staff	All male identified staff in percent based on all identified staff	All female identified staff in percent based on all identified staff
Quartile 1 (low)	25.65%	74.35%		
Quartile 2 (low to medium)	30.04%	69.96%		
Quartile 3 (medium to high)	42.24%	57.76%		
Quartile 4 (high)	59.34%	40.66%		
Total staff/identified staff	39.32%	60.68%	70.97%	29.03%

Table 2 – Gender pay gap based on the total gross remuneration

(calculated according to the formula: Gender pay gap in percentage = (average salary of men – average salary of women)*100/average salary of men)

Total gross annual remuneration level	Gender pay gap of all staff, based on median	Gender pay gap of all staff, based on mean	Gender pay gap of identified staff, based on median	Gender pay gap of identified staff, based on mean
Quartile 1 (low)	-1.67%	-1.04%		
Quartile 2 (low to medium)	1.38%	0.77%		
Quartile 3 (medium to high)	2.17%	1.42%		
Quartile 4 (high)	7.18%	10.85%		
Total staff/identified staff	26.13%	25.96%	22.76%	27.21%

Recommendation Z – concerning the rules of internal governance in banks

Legal basis	Details
<p>Recommendation Z</p>	<p>13.6 Conflicts of Interest Management Policy</p> <p>In accordance with the Conflict of Interest Management Policy (hereinafter referred to as the Policy) adopted by the Management Board and the Supervisory Board, the Bank publicly discloses on its website information on the policy adopted by the Bank in the field of managing conflicts of interest and information on the method of managing significant conflicts of interest and conflicts that could arise as a result of transactions concluded by the Bank with its subsidiaries (§ 3 item 7).</p> <p>Once a year, the Bank submits information to the Polish Financial Supervision Authority on how the Bank manages significant conflicts of interest and conflicts that could arise as a result of the Bank being a member of the Group or transactions concluded by the Bank with other entities in the Alior Bank S.A. Capital Group (§ 3 item 8).</p> <p>The Bank has defined a significant conflict of interest as one that, despite taking steps to eliminate or mitigate its negative impact, poses a real risk of harming the interests of the Client/Bank/Counterparty. The method for managing significant conflicts of interest is described in Section 13 of the Policy. As part of the quarterly Compliance Risk Monitoring Report, the Compliance Department informs the Bank's Management Board and the Supervisory Board or the Supervisory Board Audit Committee about potential and actual conflicts of interest (§ 13, point 2).</p> <p>In the event of significant conflicts, the Compliance Department presents to the Member of the Management Board supervising the Compliance Department recommendations for actions provided for in internal regulations and generally applicable legal provisions in order to draw professional and legal consequences for persons in whose actions a significant conflict of interest has been identified. Recommendations in this regard are presented after consultation with the Director of the Legal Department and the Director of the HR Division, no later than 14 days from the date a significant conflict is identified (§ 13, point 3b).</p> <p>In 2025, no cases of significant conflict of interest were identified.</p>
<p>30.1</p>	<p>The Bank sets the maximum ratio of the average total gross remuneration of Management Board members over the annual period to the average total gross remuneration of other Bank employees over the annual period at 22. This ratio was set at a level enabling the Bank's employees to effectively perform their duties, taking into account the need for prudent and stable management of the Bank, as well as the Salary Cap Act.</p>

EU REM1 – Remuneration awarded for the financial year

PLN m

				a	b	c	d
				MB Supervisory function	MB Management function	Other senior management	Other identified staff
				0010	0020	0030	0040
1	Fixed remuneration	Number of identified staff	0010	8	6	38	18
2		Total fixed remuneration	0020	2	9	23	6
3		Of which: cash-based	0030	2	9	22	6
4		(Not applicable in the EU)	0039				
EU-4a		Of which: shares or equivalent ownership interests	0040				
5		Of which: share-linked instruments or equivalent non-cash instruments	0050				
EU-5x		Of which: other instruments	0060				
6		(Not applicable in the EU)	0069				
7		Of which: other forms	0070			1	
8	(Not applicable in the EU)	0079					
9	Variable remuneration	Number of identified staff	0080	8	6	38	18
10		Total variable remuneration	0090		1	3	1
11		Of which: cash-based	0100		1	2	1
12		Of which: deferred	0110				
EU-13a		Of which: shares or equivalent ownership interests	0120				
EU-14a		Of which: deferred	0130				
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	0140			1	
EU-14b		Of which: deferred	0150				
EU-14x		Of which: other instruments	0160				
EU-14y		Of which: deferred	0170				
15	Of which: other forms	0180					
16	Of which: deferred	0190					
17	Total remuneration (2 + 10)		0200	2	10	26	7

The table presents the remuneration of individuals employed/holding a position as of December 31, 2025. It does not include benefits from the Company Social Benefits Fund.

* As of the date of publication of this report, the variable remuneration for 2025 for the employees indicated in the table above has not yet been awarded. This document will be amended to include the variable remuneration amounts for 2025, after obtaining approval as required by the Remuneration Policy.

EU REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

PLN m

			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
			0010	0020	0030	0040
	Guaranteed variable remuneration awards	0009				
1	Guaranteed variable remuneration awards - Number of identified staff	0010				
2	Guaranteed variable remuneration awards -Total amount	0020				
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	0030				
	Severance payments awarded in previous periods, that have been paid out during the financial year	0039				
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	0040		2	2	1
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	0050		1		
	Severance payments awarded during the financial year	0059				
6	Severance payments awarded during the financial year - Number of identified staff	0060			2	2
7	Severance payments awarded during the financial year - Total amount	0070				
8	Of which paid during the financial year	0080				
9	Of which deferred	0090				
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	0100				
11	Of which highest payment that has been awarded to a single person	0110				

EU REM3 – Deferred remuneration

PLN m

			Deferred and retained remuneration							
			Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
			a	b	c	d	e	f	EU - g	EU - h
			0010	0020	0030	0040	0050	0060	0070	0080
1	MB Supervisory function	0010								
2	Cash-based	0020								
3	Shares or equivalent ownership interests	0030								
4	Share-linked instruments or equivalent non-cash instruments	0040								
5	Other instruments	0050								
6	Other forms	0060								
7	MB Management function	0070	1		1					
8	Cash-based	0080	1							
9	Shares or equivalent ownership interests	0090								
10	Share-linked instruments or equivalent non-cash instruments	0100			1					
11	Other instruments	0110								
12	Other forms	0120								
13	Other senior management	0130	4	1	3			1	1	
14	Cash-based	0140	2		2					
15	Shares or equivalent ownership interests	0150								
16	Share-linked instruments or equivalent non-cash instruments	0160	2	1	1			1	1	
17	Other instruments	0170								
18	Other forms	0180								

			Deferred and retained remuneration							
			Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
			a	b	c	d	e	f	EU - g	EU - h
			0010	0020	0030	0040	0050	0060	0070	0080
19	Other identified staff	0190								
20	Cash-based	0200								
21	Shares or equivalent ownership interests	0210								
22	Share-linked instruments or equivalent non-cash instruments	0220								
23	Other instruments	0230								
24	Other forms	0240								
25	Total amount	0250	5	5	4			1	1	

The table presents the remuneration of employees/persons in positions as of December 31, 2025. The total amount of the adjustment during a given financial year resulting from indirect ex-post adjustments presented in the table is calculated based on the difference between the Bank's share price as of December 30, 2024, and the cash-in price for the tranche due in 2025, as well as the difference between the Bank's share price as of December 30, 2024, and the price as of December 30, 2025, for tranches due in subsequent years.

EU REM4 – Remuneration of 1 million EUR or more per year

PLN m

Range in EUR		Identified staff that are high earners as set out in Article 450(i) CRR
		a
		0020
>= 1.000.000 < 1 500.000	0010	
>= 1.500.000 < 2.000.000	0020	
>= 2.000.000 < 2.500.000	0030	
>= 2.500.000 < 3.000.000	0040	
>= 3.000.000 < 3.500.000	0050	
>= 3.500.000 < 4.000.000	0060	
>= 4.000.000 < 4.500.000	0070	
>= 4.500.000 < 5.000.000	0080	
>= 5.000.000 < 6.000.000	0090	
>= 6.000.000 < 7.000.000	0100	
>= 7.000.000 < 8.000.000	0110	

In 2025, among the persons employed at the Bank and belonging to the category of persons whose professional activities have a significant impact on the Bank's risk profile, no one achieved a total remuneration exceeding the equivalent of EUR 1,000,000.

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

PLN m

		Management body remuneration			Business areas					-	
		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
		a	b	c	d	e	f	g	h	i	j
		0010	0020	0030	0040	0050	0060	0070	0080	0090	0100
1	Total number of identified staff	0010									70
2	Of which: members of the MB	0020	8	6	14						
3	Of which: other senior management	0030				5	4	1	11	17	
4	Of which: other identified staff	0040				3	4		11		
5	Total remuneration of identified staff	0050	2	10	12	4	6	1	8	14	
6	Of which: variable remuneration	0060		1	1		1		1	2	
7	Of which: fixed remuneration	0070	2	9	11	4	4	1	7	12	

The table presents the remuneration of persons employed as at December 31, 2025.

EU AE1 – Encumbered and unencumbered assets

PLN m

			Carrying amount of encumbered assets	of which notionally eligible EHQLA and HQLA	Fair value of encumbered assets	of which notionally eligible EHQLA and HQLA	Carrying amount of unencumbered assets	of which EHQLA and HQLA	Fair value of unencumbered assets	of which EHQLA and HQLA
			0010	0030	0040	0050	0060	0080	0090	0100
010	Assets of the disclosing institution	0010	1 682		1 041		97 224		23 647	
030	Equity instruments	0030					181		181	
040	Debt securities	0040	1 041		1 041		23 466		23 466	
050	of which: covered bonds	0050								
060	of which: securitisations	0060								
070	of which: issued by general governments	0070	1 041		1 041		20 331		20 331	
080	of which: issued by financial corporations	0080					1 187		1 187	
090	of which: issued by non-financial corporations	0090								
120	Other assets	0120	641				73 577			

EU AE2 – Collateral received and own debt securities issued

PLN m

			Fair value of encumbered collateral received or own debt securities issued	of which notionally eligible EHQLA and HQLA	Unencumbered	
					Fair value of collateral received or own debt securities issued available for encumbrance	of which EHQLA and HQLA
			0010	0030	0040	0060
130	Collateral received by the disclosing institution		0130		1 563	
140	Loans on demand		0140			
150	Equity instruments		0150			
160	Debt securities		0160		1 563	
170	of which: covered bonds		0170			
180	of which: securitisations		0180			
190	of which: issued by general governments		0190		1 563	
200	of which: issued by financial corporations		0200			
210	of which: issued by non-financial corporations		0210			
220	Loans and advances other than loans on demand		0220			
230	Other collateral received		0230			
240	Own debt securities issued other than own covered bonds or securitisations		0240			
241	Own covered bonds and securitisations issued and not yet pledged		0241			
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED		0250	1 682		

EU AE3 – Sources of encumbrance

PLN m

			Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
			0010	0030
010	Carrying amount of selected financial liabilities	0010	1 062	1 427

EU AE4 – Accompanying narrative information

Legal basis	Row number	Details
Article 443 CRR	a)	<p>Information regarding encumbered and unencumbered assets was prepared pursuant to Commission Delegated Regulation (EU) 2024/3117 of 29 November 2024 supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council (CRR) with regard to regulatory technical standards for the disclosure of information on encumbered and unencumbered assets.</p> <p>The exposure value for disclosure purposes is equal to the net carrying amount. Average exposure values are estimated as of the end of the last four quarters of 2025.</p>
Article 443 CRR	b)	<p>As of December 31, 2025, the Alior Bank SA Capital Group held encumbered assets resulting from:</p> <ul style="list-style-type: none"> • collateral arising from the Bank's activities on the derivatives market (ISDA), • security deposits for transactions concluded on Alior Trader, • treasury bonds blocked under the Bank Guarantee Fund.

ESG – Environmental, Social and Corporate Governance

Legal basis	Details
Art. 449a CRR	<p>Alior Bank SA does not disclose prudential information on ESG risks as of December 31, 2025. The basis for this interpretation is the EBA's non-action letter of August 5, 2025: <i>"For all institutions other than the institutions mentioned in point (a) above, competent authorities do not prioritize the enforcement of the disclosure of the corresponding ESG-risk disclosure templates, as applicable for each type of institution in accordance with Commission Implementing Regulation (EU) 2024/3172."</i></p>

Management Board's statement

The Management Board of Alior Bank SA hereby declares that the arrangements described in the Report are adequate to the facts, and the risk management systems used are appropriate from the point of view of the risk profile and strategy of the Alior Bank SA Group.

Management Board's statement on the liquidity risk

In 2025, the Bank's Management Board reviewed annually the expected level of liquidity risk tolerance defined by a system of limits imposed on liquidity risk, which results from the risk appetite included in the assumptions of the Bank's overall business strategy and is consistent with it, and by setting a "survival horizon" taking into account scenarios with varying degrees of severity and probability of materialization.

Alior Bank, as an institution operating mainly on the retail market and independent of a foreign parent institution, is characterized by a reduced level of liquidity risk resulting from maintaining a stable deposit base (characterized by high stability at the level of 95.1%), as well as a small exposure to long-term mortgage loans denominated in foreign currencies.

As of December 31, 2025, all liquidity measures were at safe levels, including the LCR of 245%, the NSFR of 149%, and the total liquidity buffer of PLN 27.4 billion, compared to the required level of PLN 11.7 billion resulting from the shock scenario. Detailed information regarding the Bank's liquidity risk profile is discussed in the Disclosures section on liquidity risk.

The Bank's liquidity risk management systems ensured that liquidity risk remained at a level consistent with the risk appetite set by the Supervisory Board in 2025. The Bank's Internal Liquidity Adequacy Assessment Process (ILAAP) ensured stable funding and adequate liquidity buffers to meet its obligations on time, even in stressful situations, and ensured compliance with regulatory liquidity requirements. Liquidity remained at a safe level throughout the period, as reflected by liquidity ratios significantly above the limits. Therefore, the Bank did not identify the need to take extraordinary measures to improve its liquidity position.

The Management Board of the Bank hereby declares that the liquidity risk management arrangements described in the Disclosures are adequate to the facts and the applied liquidity risk management systems are appropriate from the point of view of the profile, scale of operations, strategy and financial plans of the Alior Bank SA Capital Group.