

Regulation Specification

Last amendment:

Resolution No. 226/2025 of the Management Board of the Bank dated 12 June 2025

Effective date: as of the date of approval of the Regulation by the Supervisory Board of the Bank

Regulation owner: Accounting Department

**Information policy regarding capital adequacy and
other information
subject to disclosure in Alior Bank S.A.**

Chapter 1

General provisions

§ 1

Information policy regarding capital adequacy and other information subject to disclosure in Alior Bank S.A. (hereinafter referred to as the "Information Policy") defines the scope, principles, and manner of publication of the qualitative and quantitative information related to capital adequacy and the scope of information to be disclosed pursuant to:

- Part Eighth 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: "CRR Regulation");
- Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637, as amended, including Commission Implementing Regulation (EU) 2026/722 of 26 March 2026 amending the implementing technical standards laid down in Implementing Regulation (EU) 2024/3172 as regards the implementation and use by institutions, other than small and non-complex institutions, of the EBA single access point for their disclosures, as amended,
- The Act of 29 August 1997 - Banking Law (consolidated text: Journal of Laws of 2026, item 38, as amended, (hereinafter referred to as the "Banking Law Act") - Article 111a,
- The Act of 5 August 2015 on the Macroprudential Supervision over the Financial System and Crisis Management in the Financial System (consolidated text: Journal of Laws 2025, item 819, as amended),
- PFSA's Recommendation M concerning operational risk management in banks,
- PFSA's Recommendation P concerning financial liquidity risk management in banks,
- PFSA's Recommendation R concerning principles of classification of credit exposures, estimation and recognition of expected credit losses and credit risk management,
- PFSA's Recommendation Z concerning corporate governance principles in banks,
- Commission Implementing Regulation (EU) 2021/763 of 23 April 2021 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council and Directive 2014/59/EU of the European Parliament and of the Council with regard to the supervisory reporting and public disclosure of the minimum requirement for own funds and eligible liabilities, as amended,
- EBA/GL/2021/04 Guidelines of 2 July 2021 on sound remuneration policies under Directive 2013/36/EU,
- EBA/GL/2022/08 Guidelines of 30 June 2022 on the data collection exercises regarding high earners under Directive 2013/36/EU and under Directive (EU) 2019/2034
- EBA/GL/2022/06 Guidelines of 30 June 2022 on the benchmarking exercises on remuneration practices, the gender pay gap and approved higher ratios under Directive 2013/36/EU,
- other EBA guidelines, Commission (EU) Implementing and Delegated Regulations, and PFSA's Recommendations applicable to the Information Policy.

§ 2

The Bank, when announcing to the public all information, also covered by the Information Policy, follows the principle that all information made available presents the material and financial situation of the Bank correctly, reliably, and clearly to the applicable extent and in accordance with the provisions of law.

§ 3

The terms and phrases used in the Information Policy shall have the following meaning:

Bank – Alior Bank Spółka Akcyjna, with its registered office in Warsaw

EBA – the European Banking Authority referred to in Regulation (EU) 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), as amended)

Alior Bank S.A. Capital Group – the Bank with its subsidiaries

PFSA – Polish Financial Supervision Authority

MREL – Minimum Requirement for Eligible Liabilities and Own Funds.

Material Risk Takers – persons holding positions specified on the List of Material Risk Takers maintained by the Bank in accordance with the rules set out in the applicable Remuneration Policy of Alior Bank S.A.

PFSA's Recommendations - recommendations issued pursuant to Article 137 item 5 of the Banking Law Act

EBA guidelines – guidelines issued in accordance with Article 16 of Regulation (EU) No. 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No. 716/2009/EC and repealing Commission Decision 2009/78/EC, as amended.

Chapter 2 The scope of announced information

§ 4

1. As a parent company in the Alior Bank S.A. Capital Group, the Bank announces information on the basis of consolidated data.
2. The information pertains in particular to:
 - a. objectives and strategies for managing individual risk categories pursuant to Article 435 of the CRR Regulation,
 - b. scope of disclosure pursuant to Article 436 of the CRR Regulation,
 - c. own funds pursuant to Article 437 of the CRR Regulation,
 - d. compliance with capital requirements for own funds and risk-weighted exposure amounts pursuant to Article 438 of the CRR Regulation,
 - e. exposure to counterparty credit risk pursuant to Article 439 of the CRR Regulation,
 - f. compliance with the requirements for countercyclical buffer pursuant to Article 440 of the CRR Regulation,
 - g. exposures to credit and dilution risk and non-performing and restructured exposures pursuant to Article 442 of the CRR Regulation and having regard to the provisions of Recommendation R,
 - h. use of external credit assessment institutions (ECAIs) pursuant to Article 444 of the CRR Regulation,
 - i. applied credit risk mitigation techniques pursuant to Article 453 of the CRR Regulation,
 - j. encumbered assets and unencumbered assets pursuant to Article 443 of the CRR Regulation,
 - k. exposure to counterparty credit risk pursuant to Article 445 of the CRR Regulation¹,

¹ Following the postponement of the implementation date for the CRR amendments relating to market risk (Commission Delegated Regulation (EU) 2025/1496 of 12 June 2025 amending Regulation (EU) No 575/2013 of the European Parliament and of the Council as regards the date of application of own funds requirements for market risk) to 31 December 2026, the Bank is preparing disclosures relating to market risk in accordance with the existing rules.

- l. operational risk pursuant to Articles 435 and 446 of the CRR Regulation and the provisions of Recommendation M,
 - m. information on key indicators pursuant to Article 447 of the CRR Regulation,
 - n. exposure to interest rate risk on positions not included in the trading book of the Bank pursuant to Article 448 of the CRR Regulation,
 - o. securitisation exposures pursuant to Article 449 of the CRR Regulation,
 - p. ESG risks in accordance with Article 449a of the CRR Regulation,
 - q. principles for formulating remuneration policies, including those for material risk takers and persons exercising control functions pursuant to Article 450 of the CRR Regulation, published guidelines EBA/GL/2022/06, EBA/GL/2022/08 and EBA/GL/2021/04, and the provisions of Recommendation Z, especially information regarding the maximum ratio of the average total gross remuneration of the members of the Management Board over an annual period to the average total gross remuneration of the other employees of the Bank over an annual period, set out in the remuneration policy of the Bank, and the disclosure of appropriate information concerning the conflict of interest management policy adopted at the Bank,
 - r. financial leverage, including a description of procedures used to manage the risk of excessive financial leverage and a description of factors affecting the level of the leverage ratio pursuant to Article 451 of the CRR Regulation,
 - s. liquidity requirements pursuant to Article 451a of the CRR Regulation and the provisions of Recommendation P,
3. The Bank discloses the information the **minimum** scope of which is specified in Part Eight of the CRR Regulation, and it takes into account the Recommendations issued by the PFSA and EBA Guidelines.
 4. The Bank shall each time assess the adequacy of the disclosed information in the context of providing market participants with a comprehensive view of the risk profile of the Bank and Alior Bank S.A. Capital Group.

§ 5

1. Pursuant to Article 432 of the CRR Regulation, the Bank does not announce information:
 - a. that is irrelevant, i.e. any information whose omission or distortion cannot alter the assessment or decision of the person using such information when making economic decisions, or cannot influence such assessment or decision,
 - b. whose disclosure may have an adverse impact on the position of the Bank on the relevant market within the meaning of the provisions on competition and consumer protection,
 - c. that is covered by a legally protected secret or which cannot be disclosed in accordance with applicable laws and regulations.
2. In the cases referred to in item 1 above, the Bank (unless prohibited by applicable provisions of law) shall state the reasons for withdrawing from the announcement of information and disclose general data in this scope, unless such data can be characterised as information defined in items 1(b) and 1(c) above.

Chapter 3

Frequency and date of the announcement of information

§ 6

1. In accordance with the requirements of Articles 433 and 433c of the CRR Regulation, the Bank publishes the disclosure document, taking into account the scale of activities under Article 4(145) and 4(146) of the CRR Regulation:

- a. **annually** – as at 31 December of each year, containing the full scope of information specified in § 4, taking into account § 5 above,
 - b. **semi-annually** – as at 30 June of each year, containing the scope of information required in the semi-annual cycle, e.g. the most important indicators referred to in Article 447 of the CRR Regulation.
2. The information listed in item 1(a) above shall be announced by the Bank in the form of an annual disclosure report: “Capital Adequacy and Other Information Subject to Disclosure of the Alior Bank S.A. Capital Group”.
 3. The information listed in item 1(b) above shall be announced by the Bank in the form of an annual disclosure report: “Capital Adequacy and Other Information Subject to Disclosure of the Alior Bank S.A. Capital Group”.
 4. The date of annual publication of disclosed information coincides with the date of publication of the Consolidated Financial Statements of the Alior Bank S.A. Capital Group.
 5. The Bank publishes quarterly information on the amount of solvency ratio, the amount and structure of own funds, financial leverage, MREL and changes in the scope specified in Article 111a.4 of the Banking Law Act, i.e. a description of the management system, including the risk management system, the internal control system, and the remuneration policy.
 6. The Bank shall publish quarterly information referred to in item 5 above in the Interim Consolidated Financial Statements of the Alior Bank S.A. Capital Group and make it available within the time limit for the publication of that report on the website of the Bank, in the investor relations section: [Financial results - Alior Bank](#).

Chapter 4 Form and place of publication

§ 7

1. Information policy and annual disclosure report: “Capital Adequacy and Other Information Subject to Disclosure of the Alior Bank S.A. Capital Group” are published on the Bank’s website:
 - in capital adequacy section:
<https://www.aliorbank.pl/dodatkowe-informacje/przydatne-dokumenty/dokumenty-prawne.html>
 - in investor relations section:
<https://www.aliorbank.pl/dodatkowe-informacje/relacje-inwestorskie/wyniki-finansowe.html>
2. “Capital Adequacy and Other Information Subject to Disclosure of the Alior Bank S.A. Capital Group” are published on the Bank’s website:
 - in capital adequacy section:
<https://www.aliorbank.pl/dodatkowe-informacje/przydatne-dokumenty/dokumenty-prawne.html>
 - in investor relations section:
<https://www.aliorbank.pl/dodatkowe-informacje/relacje-inwestorskie/wyniki-finansowe.html>
3. The Bank publishes annual and semi-annual disclosures both in Polish and English on the date of publication of Consolidated Financial Statements of the Alior Bank S.A. Capital Group.
4. The Bank simultaneously submits to the EBA the information it discloses regarding capital adequacy, in accordance with Articles 434 and 434a of the CRR Regulation.

Chapter 5 Principles of verification and approval of disclosed information

§ 8

1. In accordance with Annex 1 to the Information Policy, the relevant substantive units of the Bank are responsible for preparing and verifying the data in terms of accuracy and completeness. The

Accounting Department is responsible for coordinating activities related to the preparation of the uniform disclosure report (semi-annual/annual).

2. Disclosure information not covered by the certified auditor's review of the financial statements is verified in accordance with the tasks set out in the Organisational Regulations of the Alior Bank S.A. Head Office by substantive entities.
3. Annual report: "Capital Adequacy and Other Information Subject to Disclosure of the Alior Bank S.A. Capital Group" is approved by the Management Board of the Bank and submitted to the Supervisory Board of the Bank for approval by way of a resolution.
4. Semi-annual report: "Capital Adequacy and Other Information Subject to Disclosure of the Alior Bank S.A. Capital Group" is approved by the Management Board of the Bank and each time submitted to the Supervisory Board of the Bank for approval by way of a resolution.

Chapter 6

Policy verification principles

§ 9

1. In accordance with the Organisational Regulations of the Alior Bank S.A. Head Office, the unit responsible for drawing up semi-annual disclosures and the Annual Report entitled 'Capital Adequacy and Other Disclosable Information of the Alior Bank S.A. Capital Group', is obliged to ensure that the Information Policy complies with legal regulations. The Information Policy is reviewed at least once a year.
2. Any amendments to the Information Policy must be made in consultation with the relevant specialist units involved in the process of preparing disclosures, in accordance with Annex 1 to the Information Policy.
3. Any and all changes introduced to the Information Policy shall be adopted on the basis of a resolution of the Management Board of the Bank and shall each time be subject to approval by the Supervisory Board by way of a resolution.