

This document is a translation from the original Polish version. In case of any discrepancies between the Polish and English versions, the Polish version shall prevail.



**INFORMATION ON CAPITAL ADEQUACY
OF THE CAPITAL GROUP OF
BANK HANDLOWY W WARSZAWIE S.A.
AS AT 31 DECEMBER 2021**

MARCH 2022

INTRODUCTION	3
I. RISK MANAGEMENT OBJECTIVES AND POLICIES.....	5
II. INFORMATION RELATED TO THE USE OF PRUDENTIAL NORMS	11
III. INFORMATION REGARDING OWN FUNDS.....	15
IV. CAPITAL ADEQUACY.....	21
V. CAPITAL BUFFERS	23
VI. INFORMATION REGARDING RISK	25
1. CREDIT RISK.....	25
2. COUNTERPARTY CREDIT RISK.....	42
3. INFORMATION REGARDING CREDIT RISK MITIGATION TECHNIQUES	49
4. INFORMATION REGARDING APPLICATION OF STANDARDISED APPROACH TO CALCULATE RISK-WEIGHTED EXPOSURE AMOUNTS	50
5. INFORMATION REGARDING EXPOSURE TO SECURITISATION POSITIONS.....	50
6. MARKET RISK.....	54
7. OPERATIONAL RISK.....	55
VII. INFORMATION RELATED TO THE LIQUIDITY.....	59
VIII. INTERNAL CAPITAL ADEQUACY ASSESSMENT.....	65
IX. UNENCUMBERED ASSETS.....	66
X. LEVERAGE RATIO.....	70
XI. INFORMATION REGARDING THE REMUNERATION POLICY.....	74
XII. DECLARATION OF THE MANAGEMENT BOARD OF BANK.....	84

Introduction

This document has been laid down to execute The Disclosure Policy of Bank Handlowy w Warszawie S.A. on capital adequacy¹, to meet the disclosure requirements 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 with amendments (Regulation (EU) No. 575/2013),
- Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 amending Regulations (EU) No. 575/2013 and (EU) 2019/876
- as regards certain adjustments in response to the COVID-19 pandemic,
- as well as of Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (“CRD”)
- and on the basis of other EU Commission regulations imposing regulatory and implementing technical standards in the area of information disclosure.

The objective of the document is presenting to the third parties, especially customers of the Capital Group of Bank Handlowy w Warszawie S.A. (hereinafter referred to as: Group) and financial market participants, the Group’s risk management strategy and processes, information on the capital structure, exposure to risk and capital adequacy, which enable thorough assessment of the Group’s financial stability. This document complements information included in:

- the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A for the financial year ended 31 December 2021,
- and in the Report on Activities of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. in 2021 and refers to them wherever it is relevant .

Pursuant to the 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, Bank publishes disclosures on capital adequacy on the basis of consolidated data as of 31 December 2020 the Report on Activities of the Capital Group of Bank Handlowy w Warszawie S.A. for 2020.

When the disclosures required by the Regulation (EU) No. 575/2013 of the European Parliament and of the Council are published in the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A for the financial year ended 31 December 2020, this document refers to the number of explanatory note, which discloses required information.

The values presented in the disclosures are expressed in thousands of zlotys, except for situations in which a different unit of measurement was used, detailed in the data presented.

The published information is approved by the Bank’s Management Board and the Supervisory Board of the Bank, after recommending by the Audit Committee of the Supervisory Board

The terms used in the document shall mean the following:

Regulation No. 575/2013 / CRR - 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 with amendments;

Commission Delegated Regulation (EU) No. 183/2013 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 for specifying the calculation of specific and general credit risk adjustments;

¹ The Disclosure Policy of Bank Handlowy w Warszawie S.A. on capital adequacy laid down by the Management Board and approved by the Supervisory Board are available at the Bank’s website www.citihandlowy.pl in the “Investor Relations” section.

Regulation on risk management and remuneration policy - Regulation of the Minister of Development and Finance of 6 March 2017 on the risk management system and internal control system, remuneration policy and detailed method of estimating internal capital in banks (D.U. 2017, item 637);

Commission Delegated Regulation (EU) No. 604/2014 of 4 March 2014 supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to regulatory technical standards with respect to qualitative and appropriate quantitative criteria to identify categories of staff whose professional activities have a material impact on an institution's risk profile;

The law on macro-prudential oversight - The law of 5 August 2015 on macro-prudential oversight of the financial system and crisis management in the financial system (Official Journal from 2015, item 1513);

Commission Implementing Regulation (EU) 2021/637 of 15 March 2021 laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No. 575/2013 of the European parliament and of the Council and repealing Commission Implementing Regulation (EU) No. 1423/2013, Commission Delegated Regulation (EU) 2015/1555, Commission Implementing Regulation (EU) 2016/200 and Commission Delegated Regulation (EU) 2017/2295;

Guidelines on uniform disclosures under Article 473a of Regulation (EU) No. 575/2013 as regards the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds (EBA/GL/2019/01) - 16/01/2019;

Regulation (EU) 2017/2395 of the European Parliament and of the Council of 12 December 2017 amending Regulation (EU) No. 575/2013 as regards transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds and for the large exposures treatment of certain public sector exposures denominated in the domestic currency of any Member State;

Regulation (EU) 2019/630 of the European Parliament and of the Council of 17 April 2019 amending Regulation (EU) No. 575/2013 as regards minimum loss coverage for non-performing exposures,

Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 amending Regulation (EU) No. 575/2013 as regards the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements, and Regulation (EU) No. 648/2012,

Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 amending Regulations (EU) No. 575/2013 and (EU) 2019/876 as regards certain adjustments in response to the COVID-19 pandemic,

Commission Delegated Regulation (EU) No. 2020/2176 of 12 November 2020 amending Delegated Regulation (EU) No. 241/2014 as regards the deduction of software assets from Common Equity Tier 1 items.

I. Risk management objectives and policies

The risk management process is consistent within the Group, including Bank Handlowy in Warsaw S.A. and its Subsidiaries (Dom Maklerski Banku Handlowego S.A., Handlowy Leasing Sp. z o.o.), and excludes special purpose vehicles, companies in the process of liquidation or bankruptcy, as well as units not conducting current, statutory activity.

The aim of the risk management strategy of the Bank is to take a balanced risk with shared responsibility, without forsaking individual accountability. Taking a balanced risk means proper identification, measurement and risk aggregation, and the establishment of limits with full understanding of both the macroeconomic environment, the profile of the Group's activity, requirement to meet regulatory standards, as well as strategic and business objectives within available resources, capital and liquidity, maximizing return on capital employed.

The Group's risk management and control system is based on a model of three lines of defense. The purpose of this model is to ensure a stable and effective framework for risk management by defining and implementing three "levels" of risk management with different roles, responsibilities and duties related to supervision.

The lines of defense work together to ensure that the risk-taking in the Group's operations remains consistent with the business strategy and the risk management strategy (risk appetite). The lines of defense play a key role in the management and enforcement of the established risk management framework within the Group. The model of three lines of defense functioning at the Group:

- takes into account the entire organisational structure of the Group as well as the activities carried out in individual areas;
- aims to ensure that the tasks performed on various risk management "levels" are not duplicated and that there is a clear division of roles and responsibilities between those who:
 - generate risk in the Group's operations;
 - independently assess and oversee the risk within the Group;
 - ensure an independent assessment of the risk management system and the internal control system;
- provides an appropriate risk level reporting system within the Group.

The first line of defense is constituted by organisational units responsible for conducting business activity, which involves taking risks and for risk management in the Bank's operating activities.

The second line of defense are organisational units which are independent of the business units and support units in which they control the risk, located on the first level (organisational units of the Risk Management Sector, Compliance Division, Finance Management Sector, Legal Division, HR Division). These units are responsible for establishing risk management standards for identifying, measuring or assessing, mitigating, controlling, monitoring and reporting, and supervising the control mechanisms used by other organisational units of the Bank in order to mitigate the risk.

The Third Line of Defense is an internal audit unit responsible for an independent assessment of the risk management system and the internal control system

The Management Boards of the Bank entities ensure appropriate organisational structures and the implementation of procedures and processes adequate to the risk taken.

Risk management is implemented based on the strategies, policies and procedures relating to taking, monitoring and limiting the risk, standards for the identification, valuation, acceptance, control, monitoring and reporting of risk to which the Group is or may be exposed at.

Risk management strategies, policies and procedures are regularly reviewed to ensure compliance with applicable laws, regulations, supervisory institutions and regulatory recommendations, internal regulations, business and market practices and the adequacy of the scale, nature and complexity of the Group's operations. Strategies and processes of risk management, as well as the structure and organization of units managing the appropriate risks and solutions used by the Group on measurement and reporting of those risks, are presented in details in the note 3 „Risk management” to the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended 31 December 2021.

Ensuring the adequacy of risk management arrangements of the Group and confirmation, that the risk management systems used are appropriate from the institution profile and strategy point of view, takes place within the annual capital planning process.

As per the current „Principles of prudent and stable risk management in the Capital Group of Bank Handlowy w Warszawie S.A.” Risk and Capital Management Committee performs not less frequently than once a year, within the process of internal capital assessment and maintenance, an adequacy assessment of the solutions to the actual size and complexity of the Group, including its profile and strategy. The conclusions of such review are submitted to the Management Board for approval.

The Management Board has confirmed that the process of internal capital assessment and maintenance and risk management systems in the Group are appropriate to the nature, scale and complexity of its activities.

As part of the Group's annual capital planning process, a general risk profile of the Group (Risk Register) is determined, taking into account the business model, business strategy assumptions, the current and expected macroeconomic and business environment.

The Group's risk profile includes a list of risk types identified on the basis of inherent risk types, together with a description of implemented control mechanisms, enabling their assessment on a residual basis.

The process of the Group risk profile determination includes in particular:

- identification of risks in the Group's operations, based on the experience, expertise, analysis of the macroeconomic environment, regulatory and competitive position of the Group, taking into account the profile and internal procedures;
- for identified risks: determination of the risk owner, processes and controls mitigating these risks and defining of quantitative measures for these types of risks for which it is possible;
- determination of significant risks for the Group for the year by the Management Board.

The Group manages all types of risk that are identified in its activities, while some of them considering as significant.

For measurable risks, considered as significant, the Group estimates and allocates capital. The Group may decide to create capital buffers for significant, difficult to measure risks.

Within the risk profile assessment in 2021 the following risks were identified as significant:

- Credit risk - risk of potential losses arising from a client event of default or insolvency taking into account risk mitigation techniques applied to a product or individual credit;
- Counterparty Risk - the risk of potential losses arising from changes in market prices that occur, when the client is unable to meet its contractual obligations. This risk is part of credit risk generated on such activities as derivative transactions;
- Market Risk - risk of loss resulting from potential fluctuations in the market value of the exposure as a result of the changes in underlying market risk factors. The key factors are: interest rates, FX rates, securities' prices, commodities' prices and their volatilities;

-
- Interest rate risk in banking book - risk of potential negative impact of the changes in market risk factors on the Group's interest income;
 - Liquidity Risk - risk of a Group inability to meet its obligations in due time and without incurring financial losses, which occurs due to cash flow mismatches (cash flow gap), limited asset marketability or systematic market changes;
 - Operational Risk - is the risk of loss resulting from inadequate or failed internal processes, people, or technical systems, or from external events. It includes reputation and franchise risks associated with operational risk events and business practices or market conduct. Operational risk includes legal risk. For the purpose of ICAAP process it also includes compliance risk. Operational Risk does not cover strategic risks or the risk of loss resulting solely from authorized judgments made with respect to taking credit, market, liquidity or insurance risk;
 - Compliance risk - a risk of negative effects of a failure to observe the law, supervisory regulations, internal Group's normative acts and market standards, notably:
 - a) imposition of legal or regulatory sanctions, including the imposition of financial penalties by competent authorities and regulators or of recommendations requiring the Bank to comply with them, which in turn may involve financial outlays and resources dedicated to those actions;
 - b) financial or reputational losses (loss of credibility in the eyes of trade partners) to which the Bank is exposed as a result of non-compliance with the laws, supervisory regulations, regulatory recommendations, the Bank's internal normative acts and market standards within the Bank's operations;
 - c) potential risk of the Bank incurring additional costs arising, for instance, from imposed penalties, sustained losses and cancelled contracts;
 - Technology risk and information security risk (including business continuity (CoB) and cyber risk) - risk of disruption of entity's activity or financial loss due to technical solutions' implementation, utilization or development;
 - Outsourcing risk – risk of negative impact of external party on continuation, integrity and quality of entity's activity, its property or employees;
 - Misappropriation / Fraud risk - risk connected with willful act to the detriment of entity by its employees or third parties;
 - Staffing Risk (human capital)- risk connected with recruitment, availability and professional qualification of employees, their fluctuation, ability to adapt to changes in work environment, work culture, absenteeism, tiredness, overtime, lack of utilization of annual leave for a long time, inadequate or not adjusted to the scale and complexity organizational structures, connections of personnel whose responsibilities is crucial from the perspective of the risk occurring in the Group and similar factors, which may lead to operational losses connected with human factor, it also includes the specificity and diversity of conditions related to the management of human resources in different areas of activity;
 - Operational errors/processing risk – the risk of operational errors occurrence within performed processes.

The risks identified within the Group's profile as significant are the basis for the risk appetite setting for the Group and for the individual business lines. As a result, implementing a specific strategy within the Group's business model, decisions are considered not only for the business purposes, defined in Group's Strategy but also the return on capital employed. Appropriate measures of overall risk level and sets of limits were introduced to ensure that the risk is within the tolerance level.

Additionally the Group manages inter alia the following risks:

- Money Laundering risk - risk of losses due to involvement in money laundering activity conducted by customers, intermediaries or employees;
- Tax and Accounting risk - risk of negative economic effects due to improper accountancy records, reporting, mistaken calculation of tax obligations or their delayed payments;
- Product risk - risk connected with the sale of product (service), which does not meet customers' requirements and needs, is not compliant with the law and regulations, generates additional risks (for an entity and its customers), does not have adequate support of the employees and processes;
- Legal risk - risk of losses occurring due to instability of legal regulations, changes of law and regulations, improper structure of legal relationships, quality of legal documentation, unfavourable conclusions of courts or other bodies in disputed cases, conducted with other entities;
- Models risk - potential loss, which Group may be exposed at, following decision based on data generated by models utilized by the Group, as a result of errors in models' development, implementation or utilization. Models risk includes risk of reputation loss as a result of errors in Group's financial statement or other officially published documents by Bank due to incorrect output data from a model;
- Concentration Risk - risk arising from excessive concentration from exposures to clients, groups of connected clients, customers operating in the same economic sector, geographic region, carrying out the same economic activity or trading with similar commodities, entities belonging to Group capital's group (both cross-border and local), exposures denominated in the same currency or indexed to the same currency, used credit risk mitigation techniques as well as large indirect credit exposures such as a single issuer of the security, with the potential to generate losses large enough to imperil Group's financial condition or financial ability to maintain its core operations or lead to a significant change in the risk Group's profile;
- Conduct Risk - risk that the Bank's employees or intermediaries with the help of which the Bank sells financial products - intentionally or negligently - will harm the clients, the integrity of financial markets or the integrity of the Bank.

Risks identified as significant, including quantitative indicators, current trends, and the utilization of capital limits, are monitored as a part of the regular, quarterly information provided to the Risk and Capital Management Committee of the Bank's Management Board and to the Risk and Capital Committee of the Supervisory Board. In 2021, 4 meetings of the Committee at the Bank's Board of Executives and 4 meetings of the Supervisory Board Committee took place, during which the above elements were analysed.

The Group's goal is to maintain current capital structure in order to address requirements of CRR/CRD on Common Equity Tier 1 regulatory capital. Group, as it is stated in the strategy, will continue to be adequately capitalized with diversified sources of income. Considering approved level of Overall Risk Appetite, the Group will maintain a target regulatory capital adequacy ratio at the level of minimum 11.5%. In 2021 total TCR amounted to 20,1%.

The Bank's Management Board assures compliance of the Bank's activity with the laws and supervisory regulations, Bank's internal normative acts, as well as available market practices and standards, while taking into consideration the Bank's activity on the basis of the laws of another country and the Bank's ties with other entities that could impair effective management of the Bank. The Bank's Management Board – within the framework of assurance by the internal control system of compliance with laws, supervisory regulations, the Bank's internal normative acts and available market practices and standards – is responsible for:

- effective management of compliance risk at the Bank;
- developing the Compliance Policy in Bank Handlowy w Warszawie S.A. ("Compliance Policy"), ensuring its observance and presenting the Audit Committee of the Supervisory Board with information on compliance, including reports on management of compliance risk;
- taking appropriate actions to eliminate irregularities, including corrective or disciplinary measures, in the case of identification of any irregularities in application of the Compliance Policy.

As part of assurance by the internal control system of compliance with the laws and supervisory regulations, Bank's internal normative acts, available market practices and ethical standards, the Supervisory Board:

oversees discharge of the duties related to management of compliance risk by the Bank's Management Board;

- oversees the observance of the Bank's internal normative acts, including in the area of the internal control system;
- approves the Compliance Policy;
- approves the Rules and Regulations of Operation of the Compliance Unit;
- assesses, at least once a year, the degree of effectiveness of management of compliance risk by the Bank.

The organizational unit that supports the Bank's Management Board, the Supervisory Board and the Bank's organizational units is the Compliance Unit, whose main objective is to ensure operations of Bank comply with the generally applicable laws and supervisory regulations applicable to the Bank's activity or to the financial services provided by the Bank, the Bank's internal normative acts and with market practices and standards as well as practices and standards developed within Citigroup.

The Compliance Unit shall implement the "Compliance Policy at Bank Handlowy w Warszawie S.A." (the Policy), containing the basic code of conduct ensuring compliance for the Bank's employees and explaining key processes identifying compliance risk and enabling management of compliance risk at all levels of the Bank's organization. The Compliance Policy shall be subject to approval by the Bank's Management Board and Supervisory Board.

The Compliance Unit prepares the annual Bank's Compliance Plan (*the Plan*). The Plan is the basis for ensuring compliance at the Bank and addresses the Bank's supervision over compliance functions performed in subsidiaries of the Bank. The Bank's Management Board and Audit Committee shall express its opinion on and the Bank's Supervisory Board shall approve the Plan.

The Compliance Unit prepares the "Report on compliance risk at Bank Handlowy w Warszawie S.A." (*the Report*) for the preceding year. The Compliance Unit Head shall submit the Report to the Bank's Management Board, to the Audit Committee of the Supervisory Board on the recommendation to the Supervisory Board for the approval and to the Bank's Supervisory Board for approval.

Information on the recruitment policy for the selection of members of the managing body and the actual state of their knowledge, skills and expertise

In relation to the policy and practices regarding the selection of members of managing bodies and the assessment of their qualifications relevant to the functions they perform and entrusted duties in the Bank operates the "Policy of Assessing of Management Board Members and Key Function Holders at Bank Handlowy w Warszawie S.A." and the "Policy of Assessing the Qualifications of the Members of the Supervisory Board at Bank Handlowy w Warszawie S.A." as well as the established procedure for the selection of members of the Management Board and Supervisory Board, which apply in accordance with the Guidelines of the European Banking Authority and the European Securities and Markets Authority of 2 July 2021(EBA/GL/2021/06) on the assessment of suitability of members of the management body and key function holders.

Members of the management bodies meeting the requirements referred to in art. 22aa of the Banking Law Act are competent to perform the functions and duties entrusted to them, i.e. to administer the business of a supervised institution, which results from:

- adequate knowledge (arising from their education, completed training, professional titles and otherwise acquired in the course of their career),
- adequate experience (acquired when performing certain functions or occupying certain positions),
- possessing the desired characteristics, including relevant skills,
- a warranty of due performance relating especially to:
 - reputation,
 - honesty and reliability and the ability to handle bank matters in a prudent and stable manner, including:
- independence of judgment or being characterized by the attribute of being independent and ability to devote sufficient time to perform duties.

The Supervisory Board, taking into account the initial assessment and recommendations of the Nomination and Remuneration Committee, identifies and selects qualified and experienced candidates for members of the Management Board; chosen from a suitable pool of candidates. In the assessment of candidates, above mentioned qualifications and attributes are taken into account, considering:

- the character, magnitude and complexity of the Bank's operations and
- the responsibilities relevant to the role,
- diversity in the composition of the management body having the necessary knowledge, competence and experience by the Management Board of the Bank as a whole, necessary to manage the Bank.

When determining the composition and number of members of the Management Board, the Supervisory Board takes into account in particular:

- the size and complexity of the Bank's organizational structure,
- the specificity of the Bank's operations, including the scope of activities, specialization, legal form, sources of financing,
- the Bank's business plans,
- the position and importance of the Bank in the banking system,
- the shareholder structure.

The aim of the Policy is to define the Bank's diversity management strategy to promote diversity in the selection of Board Members so as to ensure that a wide range of properties and competencies is reached in both external and internal recruitment, succession planning and to assure board members of different gender, age, educational and professional backgrounds are elected in order to acquire different perspectives and experiences and to enable independent judgment issuing and sound decision making in the performance of functions support implementation of the Bank's strategic objectives by ensuring high quality of performance of the function. Recognizing that the diversity and non-discrimination among all Employees may, i.a., facilitate the creation of an appropriately diversified pool of candidates for positions in the Management Board and support the diversity of the composition of the Management Board, the Bank promotes them in separate internal regulations.

The Bank's Management Board is composed of five to nine members, including: the President of the Management Board of the Bank, Vice Presidents of the Management Board of the Bank, with the proviso that at least half of the Members of the Management Board should be Polish citizens.

Members of the Management Board of the Bank are appointed by the Supervisory Board on an individual term of three years, upon a motion of the President of the Management Board or motion of the Member of the Supervisory Board.

The Supervisory Board is composed of five to twelve members evaluated and appointed by the General Meeting taking into account the nature, scale and complexity of the Bank's activities, initial assessment and recommendations of the Nominations and Remuneration Committee. During the selection it is requested to take into account the principles of diversity. Each Member of the Supervisory Board is appointed for a term of three years. At least half of the Members of the Supervisory Board, including its Chairperson, should be Polish citizens.

Members of the Supervisory Board of the Bank are selected from a list of candidates presented by shareholders represented in a General Meeting.

As at December 31, 2021, the number of members of the Bank's Management Board was 7, while the Supervisory Board of the Bank was composed of 8 members.

II. Information related to the use of prudential norms

Information related to the use of prudential norms concern Capital Group of Bank Handlowy w Warszawie S.A. ("Group").

Group is composed of Bank Handlowy w Warszawie S.A. ("Bank") as the parent company, as well as the following subsidiary companies: Dom Maklerski Banku Handlowego S.A. ("DMBH"), Handlowy Leasing Sp. z o.o., Handlowy Investments S.A., Handlowy-Inwestycje Sp. z o.o.

The following entities are fully consolidated:

- Dom Maklerski Banku Handlowego S.A.,
- Handlowy Leasing Sp. z o.o.,
- Handlowy Investments S.A.,
- Handlowy Inwestycje Sp. z o.o.

The Group offers brokerage services on the capital market through Dom Maklerski Banku Handlowego S.A., a wholly-owned subsidiary of the Bank.

The Capital Group of Bank Handlowy w Warszawie S.A. provides leasing portfolio services until April 30th, 2013 through Handlowy Leasing Sp. z o.o. After this date, Handlowy Leasing Sp. z o.o. – due to reducing its activity solely to execution of lease agreements signed before April 30th, 2013 - did not sign new contracts, continuing existing contracts service providing maintaining the quality of services and cost-efficiency of its operations. Leasing product remained in the Bank's offer and is offered in a form of so-called "open architecture", i.e. co-operation with the European Leasing Fund S.A. and CorpoFlota Sp. z o.o. In 2017, the active Company's leasing portfolio was sold to the Bank.

Handlowy Investments S.A. seated in Luxembourg, belongs to special purpose investment entities, through which the Bank and the Capital Group conduct capital transactions. The entity is a wholly-owned subsidiary of the Bank and its activities are financed with refundable additional capital contributions net profits earned. Due to intention to reduce the investment activities, Handlowy - Investments S.A. and similar holdings will be gradually sold or liquidated. As at 31 December 2021 Handlowy Investments S.A. had the portfolio composed of the following shares: Pol-Mot Holding S.A.

PPH Spomasz Sp. z o.o. in liquidation, due to the completed liquidation, was removed from the National Court Register on August 6, 2021.

Detailed information on how the Group's equity investment portfolio is broken down based on purchase reasons are described in chapter V point No. 8 „Equity investments” of the Report on Activities of Bank Handlowy w Warszawie S.A. and of the Capital Group of Bank Handlowy w Warszawie S.A. in 2021.

Handlowy Inwestycje Sp. z o.o. is a special purpose investment entity, through which the Bank conducts capital transactions. Handlowy Inwestycje Sp. z o.o. has in its portfolio shares of Handlowy Leasing Sp. z o.o. Activities of the entity is financed by refundable capital contributions as well as retained earnings. Handlowy Inwestycje Sp. z o.o. belongs to the portfolio of strategic entities.

There are No. proportionally consolidated entities within the Group.

There are No. entities that are neither consolidated nor deducted. There are also No. subsidiaries not included in the consolidation, for which there is a shortage of capital.

All the transactions within Group, including repayments of intercompany liabilities and transfers of funds, are concluded according to law, including Code of Commercial Law and statutory stipulations.

Within the Group, according to the best knowledge, there are No. and it is expected that there will be No. significant obstacles of legal or practical nature to fast fund transferring or repayment of liabilities between the parent and the subsidiaries.

The scope of Group's consolidation, defined in accordance with the prudential regulations (CRR) matches the scope of consolidation applied for financial reporting.

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

	a	b	c	d	e	f	g
	Carrying values of items						
	Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	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
Breakdown by asset classes according to the balance sheet in the published financial statements							
1	Cash and balances with the Central Bank	6,526,743	6,526,743	6,526,743	-	-	-
2	Amounts due from banks	967,677	967,677	333,893	633,784	-	-
3	Financial assets held-for-trading	9,956,212	9,956,212	2,970	6,095,549	-	9,956,212
4	Hedging derivatives	119,290	119,290	-	119,290	-	-
5	Debt securities available-for-sale	20,590,284	20,590,284	20,590,284	-	-	-
7	Equity investments available-for-sale	97,316	97,316	97,316	-	-	-
8	Amounts due from customers	21,327,600	21,327,600	19,241,257	414,937	1,671,406	-
9	Tangible fixed assets	451,671	451,671	451,671	-	-	-
10	Intangible assets	1,243,160	1,243,160	135,425	-	-	1,107,735
11	Current income tax receivables	54,721	54,721	54,721	-	-	-
12	Deferred income tax asset	264,313	264,313	264,313	-	-	-
13	Other assets	257,621	257,621	257,621	-	-	-
14	Non-current assets held-for-sale	6,163	6,163	6,163	-	-	-
15	Total assets	61,862,771	61,862,771	47,962,377	7,263,560	1,671,406	9,956,212
Breakdown by liability classes according to the balance sheet in the published financial statements							
1	Amounts due to banks	3 383 353	3 383 353	-	960,010	-	2,423,343
2	Financial liabilities held-for-trading	6 588 482	6 588 482	-	6,072,586	-	6,588,482
3	Hedging derivatives	-	-	-	-	-	-
4	Amounts due to customers	43 507 474	43 507 474	-	547,721	-	42,959,753
5	Provisions	142 024	142 024	-	-	-	142,024
6	Current income tax liabilities	5 974	5 974	-	-	-	5,974
7	Other liabilities	852 069	852 069	-	-	-	852,069
8	Total liabilities	54 479 376	54 479 376	-	7,580,318	-	6,588,482
9	EQUITY	7 383 395	7 383 395	-	-	-	-
10	Total liabilities and equity	61 862 771	61 862 771	-	-	-	-

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

	Total	Items subject to			
		Credit risk framework	CCR framework	Securitisation framework	Market risk framework
1 Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	61,862,771	47,962,377	7,263,560	1,671,406	9,956,212
2 Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	54,479,376	-	7,580,318	-	6,588,482
3 Total net amount under the scope of prudential consolidation	7,383,395	47,962,377	(316,758)	1,671,406	3,367,730
4 Off-balance-sheet amounts	15,920,737	15,920,737	-	-	
5 Differences in valuations	(41,315)	(20,688)	(16,253)	-	
6 Differences due to different netting rules, other than those already included in row 2	-	-	-	-	
7 Differences due to consideration of provisions	-	-	-	-	
8 Differences due to the use of credit risk mitigation techniques (CRMs)	(809,593)	(286,783)	(522,810)	-	
9 Differences due to credit conversion factors	(12,462,789)	(12,462,789)	-	-	
10 Differences due to Securitisation with risk transfer	-	-	-	-	
11 Other differences*	1,391,931	4,242	1,387,688	-	
12 Exposure amounts considered for regulatory purposes	64,860,624	51,203,087	8,125,468	1,671,406	3,860,663

* The main element of the change is the difference in total assets according to the published financial statements and the amount of total assets in the FINREP report resulting from the offsetting effect of derivatives and the methodology for calculating exposure to credit risk of the counterparty in accordance with the CRR Regulation.

Information on the consolidation method used for each entity within the scope of accounting and regulatory consolidation ranges is presented in Report on Activities of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. in 2021, in chapter III. " The organizational structure of the Capital Group of Bank Handlowy w Warszawie S.A. ".

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

Name of the entity	Method of accounting consolidation	Method of prudential consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	
Dom Maklerski Banku Handlowego S.A.	Full consolidation	X				Brokerage house
Handlowy Inwestycje Sp. z o.o.	Full consolidation	X				A special purpose vehicle - an investment vehicle
Handlowy- Leasing Sp. z o.o.	Full consolidation	X				Immaterial leasing company
Handlowy Investments S.A.	Full consolidation	X				A special purpose vehicle - an investment vehicle

III. Information regarding own funds

Information about the components of equity are presented in details in supplementary note 34 „Capital” to the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended 31 December 2021.

The structure of the Group's own funds ((Table EU CC1)), reconciliation of the Group's own funds to the equity of the Group (Table 5), information on own funds in the interim period (Table EU CC2)) and detailed description of the capital instruments' main characteristics (Table EU CC3)) are presented in the below tables:

Data are presented as at the end of December 31, 2021 in accordance with the requirements specified in Commission Implementing Regulation (EU) 2021/637 of 15 March 2021 laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No. 575/2013 of the European parliament and of the Council and repealing Commission Implementing Regulation (EU) No. 1423/2013, Commission Delegated Regulation (EU) 2015/1555, Commission Implementing Regulation (EU) 2016/200 and Commission Delegated Regulation (EU) 2017/2295.

Table EU CC1 - Composition of regulatory own funds

	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves		
1 Capital instruments and the related share premium accounts	3,008,172	e
of which: Instrument type 1	3,008,172	d
of which: Instrument type 2	-	d
of which: Instrument type 3	-	d
2 Retained earnings	640,092	h
3 Accumulated other comprehensive income (and other reserves)	2,477,977	f, g
EU-3a Funds for general banking risk	540,200	g
4 Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-	
5 Minority interests (amount allowed in consolidated CET1)	-	
EU-5a Independently reviewed interim profits net of any foreseeable charge or dividend	-	
6 Common Equity Tier 1 (CET1) capital before regulatory adjustments	6,666,441	0

Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7 Additional value adjustments (negative amount)	(41,315)	0
8 Intangible assets (net of related tax liability) (negative amount)	(1,107,735)	e
27a Other regulatory adjustments	(1,219)	g
28 Total regulatory adjustments to Common Equity Tier 1 (CET1)	(1,150,269)	
29 Common Equity Tier 1 (CET1) capital	5,516,172	
Additional Tier 1 (AT1) capital: instruments		
36 Additional Tier 1 (AT1) capital before regulatory adjustments	-	
Additional Tier 1 (AT1) capital: regulatory adjustments		
43 Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	
44 Additional Tier 1 (AT1) capital	-	
45 Tier 1 capital (T1 = CET1 + AT1)	5,516,172	
Tier 2 (T2) capital: instruments		
51 Tier 2 (T2) capital before regulatory adjustments	-	
Tier 2 (T2) capital: regulatory adjustments		
57 Total regulatory adjustments to Tier 2 (T2) capital	-	
58 Tier 2 (T2) capital	-	
59 Total capital (TC = T1 + T2)	5,516,172	
60 Total Risk exposure amount	27,416,570	
Capital ratios and requirements including buffers		
61 Common Equity Tier 1 capital	20,12%	
62 Tier 1 capital	20,12%	
63 Total capital	20,12%	
64 Institution CET1 overall capital requirements	2,77%	
65 of which: capital conservation buffer requirement	2,50%	
66 of which: countercyclical capital buffer requirement	0,02%	
67 of which: systemic risk buffer requirement		
EU-67a of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0,25%	
EU-67b of which: additional own funds requirements to address the risks other than the risk of excessive leverage		
68 Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	12,12%	

National minima (if different from Basel III)

Amounts below the thresholds for deduction (before risk weighting)

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)	40,495	a
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)	-	
74	Not applicable	-	
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)	264,312	c

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)	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	

Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)

80	Current cap on CET1 instruments subject to phase out arrangements	-	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	
84	Current cap on T2 instruments subject to phase out arrangements	-	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	

The amount of regulatory own funds as at December 31, 2021 compared to December 31, 2020 decreased by PLN 688,764 thousand. PLN, i.e. 11.1 percentage points, mainly as a result of an decrease in accumulated other comprehensive income and a decrease in deductions from Common Equity Tier 1 capital related to other deductions ie reserves in the amount 50,802 thousand PLN.

Information on the consolidation method used for each entity within the scope of accounting and regulatory consolidation ranges is presented in Report on Activities of the Capital Group of Bank Handlowy w Warszawie S.A. in 2021, in chapter IV. " The organizational structure of the Capital Group of Bank Handlowy w Warszawie S.A ".

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

	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
	As at 31.12.2021	As at 31.12.2021	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements			
1 Cash and balances with the Central Bank	6,526,743	6,526,743	
2 Amounts due from banks	967,677	967,677	
3 Financial assets held-for-trading	9,956,212	9,956,212	
4 Debt financial assets measured at fair value through other comprehensive income, including:	119,290	119,290	
5 Assets pledged as collateral	20,590,284	20,590,284	
6 Equity and other instruments measured at fair value through income statement	97,316	97,316	a
7 Amounts due from customers	21,327,600	21,327,600	
8 Tangible fixed assets	451,671	451,671	
9 Intangible assets	1,243,160	1,243,160	
10 Current income tax receivables	54,721	54,721	
11 Deferred income tax asset	264,313	264,313	b
12 Other assets	257,621	257,621	c
13 Non-current assets held-for-sale	6,163	6,163	
14 Total assets	61,862,771	61,862,771	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements			
1 Amounts due to banks	3,383,353	3,383,353	
2 Financial liabilities held-for-trading	6,588,482	6,588,482	
3 Hedging derivatives	-	-	
4 Amounts due to customers	43,507,474	43,507,474	
5 Provisions	142,024	142,024	
6 Current income tax liabilities	5,974	5,974	
7 Other liabilities	852,069	852,069	
8 Total liabilities	54,479,376	54,479,376	
Shareholders' Equity			
1 Share capital	522,638	522,638	d
2 Supplementary capital	3,001,699	3,001,699	e
3 Revaluation reserve	-312,018	-312,018	f
4 Other reserves	2,814,030	2,814,030	g
5 Retained earnings	1,357,046	1,357,046	h
6 Total equity	7,383,395	7,383,395	
Total liabilities and equity	61,862,771	61,862,771	

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

	A	B	B	B
1	Issuer	Bank Handlowy w Warszawie S.A.	Bank Handlowy w Warszawie S.A.	Bank Handlowy w Warszawie S.A.
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	ISIN: PLBH00000012	ISIN: PLBH00000012	ISIN: PLBH00000012
2a	Public or private placement	Public	Public	Public
3	Governing law(s) of the instrument	Polish law	Polish law	Polish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	Not applicable	Not applicable	Not applicable
Regulatory treatment				
4	Current treatment taking into account, where applicable, transitional CRR rules	Common equity Tier 1 capital	Common equity Tier 1 capital	Common equity Tier 1 capital
5	Post-transitional CRR rules	Common equity Tier 1 capital	Common equity Tier 1 capital	Common equity Tier 1 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo / Consolidated	Solo / Consolidated	Solo / Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Ordinary shares	Ordinary shares
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	PLN 260.000.000	PLN 4.480.000	PLN 6.230.000
9	Nominal amount of instrument	PLN 4	PLN 4	PLN 4
EU-9a	Issue price	-	-	-
EU-9b	Redemption price	-	-	-
10	Accounting classification	Equity	Equity	Equity
11	Original date of issuance	27.03.97	27.10.98	25.06.99
12	Perpetual or dated	Perpetual	Perpetual	Perpetual
13	Original maturity date	Without maturity	Without maturity	Without maturity
14	Issuer call subject to prior supervisory approval	-	-	-
15	Optional call date, contingent call dates and redemption amount	-	-	-
16	Subsequent call dates, if applicable	-	-	-
Coupons / dividends				
17	Fixed or floating dividend/coupon	Floating rate	Floating rate	Floating rate
18	Coupon rate and any related index	-	-	-
19	Existence of a dividend stopper	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	-	-	-
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	-	-	-
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	-	-	-
23	Convertible or non-convertible	Incommutable	Incommutable	Incommutable
24	If convertible, conversion trigger(s)	-	-	-
25	If convertible, fully or partially	-	-	-
26	If convertible, conversion rate	-	-	-
27	If convertible, mandatory or optional conversion	-	-	-
28	If convertible, specify instrument type convertible into	-	-	-
29	If convertible, specify issuer of instrument it converts into	-	-	-
30	Write-down features	No	No	No
31	If write-down, write-down trigger(s)	-	-	-
32	If write-down, full or partial	-	-	-
33	If write-down, permanent or temporary	Not applicable	Not applicable	Not applicable
34	If temporary write-down, description of write-up mechanism	-	-	-
34a	Type of subordination (only for eligible liabilities)	Category No. 10	Category No. 10	Category No. 10
EU-34b	Ranking of the instrument in normal insolvency proceedings	Not applicable	Not applicable	Not applicable
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	-	-	-
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	-	-	-
37a	Link to the full term and conditions of the instrument (signposting)	Not applicable	Not applicable	Not applicable

	B	B	C
1 Issuer	Bank Handlowy w Warszawie S.A.	Bank Handlowy w Warszawie S.A.	Bank Handlowy w Warszawie S.A.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	ISIN: PLBH00000012	ISIN: PLBH00000012	ISIN: PLBH00000012
2a Public or private placement	Public	Public	Public
3 Governing law(s) of the instrument	Polish law	Polish law	Polish law
3a Contractual recognition of write down and conversion powers of resolution authorities	Not applicable	Not applicable	Not applicable
Regulatory treatment			
4 Current treatment taking into account, where applicable, transitional CRR rules	Common equity Tier 1 capital	Common equity Tier 1 capital	Common equity Tier 1 capital
5 Post-transitional CRR rules	Common equity Tier 1 capital	Common equity Tier 1 capital	Common equity Tier 1 capital
6 Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo / Consolidated	Solo / Consolidated	Solo / Consolidated
7 Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Ordinary shares	Ordinary shares
8 Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	PLN 70.594.000	PLN 21.736.000	PLN 150.638.000
9 Nominal amount of instrument	PLN 4	PLN 4	PLN 4
EU-9a Issue price			
EU-9b Redemption price	-	-	-
10 Accounting classification	Equity	Equity	Equity
11 Original date of issuance	24.05.02	16.06.03	28.02.01
12 Perpetual or dated	Perpetual	Perpetual	Perpetual
13 Original maturity date	Without maturity	Without maturity	Without maturity
14 Issuer call subject to prior supervisory approval			
15 Optional call date, contingent call dates and redemption amount	-	-	-
16 Subsequent call dates, if applicable	-	-	-
Coupons / dividends			
17 Fixed or floating dividend/coupon	Floating rate	Floating rate	Floating rate
18 Coupon rate and any related index	-	-	-
19 Existence of a dividend stopper	No	No	No
EU-20a Fully discretionary, partially discretionary or mandatory (in terms of timing)			
EU-20b Fully discretionary, partially discretionary or mandatory (in terms of amount)			
21 Existence of step up or other incentive to redeem	No	No	No
22 Noncumulative or cumulative			
23 Convertible or non-convertible	Incommutable	Incommutable	Incommutable
24 If convertible, conversion trigger(s)	-	-	-
25 If convertible, fully or partially	-	-	-
26 If convertible, conversion rate	-	-	-
27 If convertible, mandatory or optional conversion	-	-	-
28 If convertible, specify instrument type convertible into	-	-	-
29 If convertible, specify issuer of instrument it converts into	-	-	-
30 Write-down features	No	No	No
31 If write-down, write-down trigger(s)	-	-	-
32 If write-down, full or partial	-	-	-
33 If write-down, permanent or temporary	Not applicable	Not applicable	Not applicable
34 If temporary write-down, description of write-up mechanism	-	-	-
34a Type of subordination (only for eligible liabilities)	Category No. 10	Category No. 10	Category No. 10
EU-34b Ranking of the instrument in normal insolvency proceedings	Not applicable	Not applicable	Not applicable
35 Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	-	-	-
36 Non-compliant transitioned features	No	No	No
37 If yes, specify non-compliant features	-	-	-
37a Link to the full term and conditions of the instrument (signposting)	Not applicable	Not applicable	Not applicable

IV. Capital Adequacy

Below we present data on the Group's capital adequacy, the amount of risk-weighted assets and capital requirements for own funds, broken down by individual risk types and key capital ratios after the retrospective profit incorporation

Data for December 31, 2021 and September 30, 2021 have been recalculated taking into account the retrospective recognition of part of the profit for 2020 (confirmation of the result by the General Meeting of Shareholders), in accordance with the EBA position expressed in Q&A 2018_4085.

Table EU OV1 – Overview of total risk exposure amounts

	Total risk exposure amounts (TREA)		Total own funds requirements
	a		c
	31.12.2021	30.09.2021	31.12.2021
1 Credit risk (excluding CCR)	20,988,125	20,831,374	1,679,050
2 Of which the standardised approach	20,988,125	20,831,374	1,679,050
3 Of which the Foundation IRB (F-IRB) approach	-	-	-
4 Of which slotting approach	-	-	-
EU 4a Of which equities under the simple riskweighted approach	-	-	-
5 Of which the Advanced IRB (A-IRB) approach	-	-	-
6 Counterparty credit risk - CCR	1,588,414	3,718,387	127,073
7 Of which the standardised approach	1,366,397	3,193,768	109,312
8 Of which internal model method (IMM)	-	-	-
EU 8a Of which exposures to a CCP	131,164	86,950	10,493
EU 8b Of which credit valuation adjustment - CVA	90,853	435,451	7,268
9 Of which other CCR	-	2,219	-
15 Settlement risk	-	-	-
16 Securitisation exposures in the non-trading book (after the cap)	227,164	234,439	18,173
17 Of which SEC-IRBA approach	-	-	-
18 Of which SEC-ERBA (including IAA)	-	-	-
19 Of which SEC-SA approach	227,164	234,439	18,173
EU 19a Of which 1250% / deduction	-	-	-
20 Position, foreign exchange and commodities risks (Market risk)	1,069,647	1,317,370	85,572
21 Of which the standardised approach	1,069,647	1,317,370	85,572
22 Of which IMA	-	-	-
EU 22a Large exposures	-	1,005,218	-
23 Operational risk	3,543,219	3,529,008	283,458
EU 23a Of which basic indicator approach	-	-	-
EU 23b Of which standardised approach	3,543,219	3,529,008	283,458
EU 23c Of which advanced measurement approach	-	-	-
24 Amounts below the thresholds for deduction (subject to 250% risk weight)	660,780	549,458	52,862
29 Total	27,416,570	30,635,796	2,193,326

Table EU KM1 - Key metrics template

	a	b	c	d	e
	31.12.2021	30.09.2021	30.06.2021	31.03.2021	31.12.2020
Available own funds (amounts)					
1 Common Equity Tier 1 (CET1) capital	5,516,172	5,812,311	5,861,438	5,875,615	6,206,230
2 Tier 1 capital	5,516,172	5,812,311	5,861,438	5,875,615	6,206,230
3 Total capital	5,516,172	5,812,311	5,861,438	5,875,615	6,206,230
Risk-weighted exposure amounts					
4 Total risk exposure amount	27,416,570	30,635,796	28,229,906	27,428,996	27,484,828
Capital ratios (as a percentage of risk-weighted exposure amount)					
5 Common Equity Tier 1 ratio (%)	20.12	18.97	20.76	21.42	22.58
6 Tier 1 ratio (%)	20.12	18.97	20.76	21.42	22.58
7 Total capital ratio (%)	20.12	18.97	20.76	21.42	22.58
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a Additional own funds requirements to address risks other than the risk of excessive leverage (%)	-	-	-	-	-
EU 7b of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 7c of which: to be made up of Tier 1 capital (percentage points)	-	-	-	-	-
EU 7d Total SREP own funds requirements (%)	8.00	8.00	8.00	8.00	8.00
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8 Capital conservation buffer (%)	2.50	2.50	2.50	2.50	2.50
EU 8a Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9 Institution specific countercyclical capital buffer (%)	0.02	0.02	0.02	0.02	0.01
EU 9a Systemic risk buffer (%)	-	-	-	-	-
10 Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a Other Systemically Important Institution buffer (%)	0.25	0.25	0.25	0.25	0.25
11 Combined buffer requirement (%)	2.77	2.77	2.77	2.77	2.76
EU 11a Overall capital requirements (%)	10.77	10.77	10.77	10.77	10.76
12 CET1 available after meeting the total SREP own funds requirements (%)	3,324,243	3,361,448	3,603,045	3,680,002	4,006,150
Leverage ratio					
13 Total exposure measure	66,340,034	67,936,362	64,262,965	62,488,848	64,876,149
14 Leverage ratio (%)	8,31	8,56	9,12	9,40	9,56
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
EU 14b of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 14c Total SREP leverage ratio requirements (%)	3.00	3.00	3.00	3.00	3.00
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e Overall leverage ratio requirement (%)	3,00	3,00	3,00	3,00	3,00
Liquidity Coverage Ratio					
15 Total high-quality liquid assets (HQLA) (Weighted value -average)	30,998,059	30,883,467	30,191,064	29,754,596	28,815,100
EU 16a Cash outflows - Total weighted value	52,069,397	47,143,148	40,838,193	40,032,660	39,583,344
EU 16b Cash inflows - Total weighted value	37,326,784	32,057,275	25,272,658	23,706,680	22,627,154
16 Total net cash outflows (adjusted value)	15,303,028	15,470,316	15,695,404	16,325,980	16,956,190
17 Liquidity coverage ratio (%)	202.56	199.63	192.36	182.25	169.94
Net Stable Funding Ratio					
18 Total available stable funding	35,490,146	36,234,479	36,443,949	38,250,538	36,968,061
19 Total required stable funding	18,831,609	18,859,549	18,753,701	21,896,580	22,472,610
20 NSFR ratio (%)	188.46	192.13	194.33	174.69	164.50

V. Capital Buffers

On January 1, 2016, the Act on macroprudential supervision entered into force. Pursuant to this act, as at December 31, 2021, the Group had buffers:

- The buffer level indicator, the value of which in the amount of 2.5%, results from Art. 84 of the Act on macroprudential supervision,
- Countercyclical buffer rate of 0.02%, - weighted average countercyclical treasure statue for recipients,
- Systemic risk buffer rate of 0%, due to the fact that on March 18, 2020, the Minister of Finance issues a regulation issuing a regulation on systemic security.
- Other institution's buffer rate with a systemic value of 0.25%.

The computed group is a group-specific countercyclical analysis

Table EU CCyB2 - Amount of institution-specific countercyclical capital buffer

1 Total risk exposure amount	27,416,570
2 Institution specific countercyclical capital buffer rate	0.02%
3 Institution specific countercyclical capital buffer requirement	6,306

Table EU CCyB1 presents geographic color transfers of relevant credit exposures

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

	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
010 Poland	22,869,051	-	6,051	-	1,200,475	24,075,578	1,581,108	484	14,406	1,595,998	19,949,972	93.18	0.0000
011 Luxembourg	536,053	-	277	-	-	536,330	42,884	22	-	42,906	536,330	2.51	0.5000
012 United Kingdom	201,356	-	-	-	-	201,356	16,108	-	-	16,108	201,344	0.94	0.0000
013 Norway	176,076	-	-	-	-	176,076	14,086	-	-	14,086	176,076	0.82	1.0000
014 Czechia	106,332	-	-	-	-	106,332	7,582	-	-	7,582	94,774	0.44	0.5000
015 Ireland	64,377	-	-	-	470,931	535,308	5,150	-	3,767	8,918	111,470	0.52	0.0000
016 India	61,025	-	-	-	-	61,025	4,882	-	-	4,882	61,025	0.29	0.0000
017 Republic of Korea	57,304	-	-	-	-	57,304	4,584	-	-	4,584	57,304	0.27	0.0000
018 Malta	46,964	-	-	-	-	46,964	3,757	-	-	3,757	46,964	0.22	0.0000
019 United States	33,113	-	-	-	-	33,113	3,652	-	-	3,652	45,654	0.21	0.0000
020 Switzerland	28,469	-	-	-	-	28,469	2,278	-	-	2,278	28,469	0.13	0.0000
021 Netherlands	22,126	-	-	-	-	22,126	1,770	-	-	1,770	22,126	0.10	0.0000
022 Belgium	20,067	-	-	-	-	20,067	1,605	-	-	1,605	20,067	0.09	0.0000
023 France	19,018	-	-	-	-	19,018	1,407	-	-	1,407	17,586	0.08	0.0000
024 Sweden	18,393	-	-	-	-	18,393	1,471	-	-	1,471	18,393	0.09	0.0000
025 Germany	12,052	-	-	-	-	12,052	864	-	-	864	10,802	0.05	0.0000
026 Hungary	11,525	-	-	-	-	11,525	922	-	-	922	11,525	0.05	0.0000
027 Austria	20	-	-	-	-	20	2	-	-	2	20	-	0.0000
028 United Arab Emirates	6	-	-	-	-	6	0	-	-	0	6	-	0.00
029 Italy	6	-	-	-	-	6	0	-	-	0	6	-	0.0000
030 Lithuania	2	-	-	-	-	2	0	-	-	0	2	-	0.0000
031 Finland	1	-	-	-	-	1	0	-	-	0	1	-	0.0000
020 Total	24,283,338	-	6,329	-	1,671,406	25,961,073	1,694,114	506	18,173	1,712,793	21,409,919	100	

VI. Information regarding risk

1. Credit Risk

The accounting definitions of past due and impaired exposures

The impairment occurs if there is an objective evidence of impairment which can be a result of, among others, default indications as below:

- Obtaining information on significant financial difficulties of the client,
- Reduction of the client credit rating by an accepted by the Bank External Credit Assessment Institution, below risk level corresponding to internal 7- rating (i.e. to CCC- for Standard & Poors, Caa3 Moody's)
- Occurrence of economic or legal reasons related to the borrower's financial difficulties and granting to the borrower a concession to financial conditions that the lender would not otherwise consider, granting permission for emergency restructuring of credit exposure, if it might result in decreasing financial requirements, reduction of financial liabilities by redeeming a significant part of the principal, interest or, where applicable, fees or deferring their repayment or payment (forborne exposure). The diminished financial obligation is when the measure of diminished financial obligation calculated according to the following formula $DO = (NPV0 - NPV1) / NPV0$, is higher than 1%. Where: DO - diminished financial obligation, NPV0 - net present value of cash flows (including unpaid interest and fees) expected under contractual obligations before the changes in terms and conditions of the contract discounted using the customer's original effective interest rate, NPV1 - net present value of the cash flows expected based on the new arrangement discounted using the customer's original effective interest rate.
- High likelihood of bankruptcy, gaining information on:
 - declaration of bankruptcy;
 - commencing bankruptcy proceedings or submitting a bankruptcy petition / petition for bankruptcy proceedings
 - putting the debtor into bankruptcy or liquidation;
 - dismissing the bankruptcy petition because the debtor's assets are insufficient or only sufficient to cover the costs of bankruptcy proceedings;
 - dissolution or annulment of the company;
 - appointing a guardian;
 - establishing a trustee (bankruptcy administrator);
 - submitting an application for restructuring proceedings within the meaning of the Restructuring Law;

or granting to the obligor a similar protection if it would allow him to avoid or delay repayment of credit obligations.

- Bank initiates procedure to obtain an enforcement title
- Default status contagion
- Delay in payment equal to 90 days or more (calculation of delay is based on materiality thresholds)
- Status of exposure has been changed from "accrual" / "performing" to "non-accrual" / "non-performing"
- Exposure has been classified (as per internal classification) to category: "Substandard-non-performing" / "non-accrual" and "Loss"
- Obligor Risk Rating (ORR) is worse than 7- which is applied for Obligors that are defaulted
- Obtaining information about a customer's default under agreements with other Citi group entities.
- In case the Economic Loss (L) resulting from the sale of credit obligations is higher than 5%, all other remaining client exposures should be considered defaulted. Where: $L=(E-P)/E$, L – the economic loss related with the sale of credit obligations; E – total outstanding amount of the obligations subject to the sale, including interest and fees; P – price agreed for the sold obligations. Moment of the sale should be regarded as the moment of default. Where the price for the total portfolio was determined by specifying the discount on particular credit obligations, the materiality of credit-related

economic loss should be assessed individually for each exposure within the portfolio. Where however the price was set only at the portfolio level, the materiality of credit-related economic loss may be assessed at the portfolio level. The following exceptions apply: where the reasons for the sale of credit obligations were not related to credit risk, such as where there is the need to increase the liquidity of the institution or there is a change in business strategy, on condition of the appropriate, documented justification of the treatment of the sale; or where the assets subject to the sale are publicly traded assets and measured at fair value.

and other loss events could have impact on the estimated future cash flows from the financial asset that can be reliably estimated.

If Bank assesses credit exposure as a credit impaired exposure, ie. classifies it to Stage 3, such exposure needs to be considered as defaulted, non-performing.

Past due exposure is the situation when the delay in payment of principal, interest or any other payments occurs, as compared to payment date. Day past due calculation is done in line with EBA/GL/2016/07 guidance and the regulation of Ministry of Finance, Investment and Development of October 3rd 2019 on the significance level of overdue credit exposure.

A description of the approaches and methods adopted for determining value adjustments and provisions

Detailed information on the management of exposures of impaired are presented in the Annual Financial Statements of the Bank Handlowy w Warszawie SA for the year ended 31 December 2021 in explanatory note no. 3 "Risk Management" in the section "Credit risk".

Write-offs for expected credit losses

The Group makes write-downs for expected credit losses according to internal rules and methodologies for calculation of write-downs prepared for all financial assets. They are made on an aggregate basis for each of the 3 stages:

- Step 1: credit exposures for which credit risk has not materially increased since the initial recognition
 - loss estimated over a horizon of 12 months (this is the part of credit losses expected for the entire exposure period resulting from the default within 12 months from the reporting date),
- Step 2: credit exposures for which there has been a significant increase in credit risk
 - credit losses are estimated for the entire duration of the exposure,
- Step 3: credit exposures for which there is objective evidence of impairment
 - credit losses estimated as for impaired assets.

Assignment of exposures to the Stage is based on the client's management approach (individual vs. group), taking into account a wide range of information obtained through standard risk management processes (including the Early Warning process) concerning both current and future events, including macroeconomic factors (taken into account in the macroeconomic scenarios prepared cyclically by the Chief Economist) and the number of days of arrears.

The Bank applies the general rule that the default of the creditor takes place in the event of one or both of the following events:

- a) the debtor's delay in performing all material credit obligations towards the Bank is 90 days or more,
- b) it is unlikely that the debtor will fully meet his credit obligations towards the Bank without the need for the institution to take measures such as the realisation of collateral.

Days past due calculation, for the purpose of exposure assignment to Stages, is done in line with EBA/GL/2016/07 guidance and the regulation of Ministry of Finance, Investment and Development of October 3rd 2019 on the significance level of overdue credit exposure.

Capital requirement in relation to Own Funds of Group is calculated according to the Regulation No. 575/2013.

The Group applies only the standard method to calculate the capital requirement for credit risk.

Table EU CR1-A: Maturity of exposures

	Net exposure value					Total
	On demand	<= 1 year	1 to 5 years	> 5 years	No stated maturity	
1 Loans and advances	5,831,338	5,006,121	5,373,991	4,089,697	101,638	20,402,785
2 Debt securities	-	3,853,715	10,917,440	7,674,703	-	22,445,859
3 Total	5,831,338	8,859,836	16,291,431	11,764,401	101,638	42,848,644

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

	Unsecured carrying amount	Secured carrying amount			Of which secured by credit derivatives	
		a	b	Of which secured by collateral		Of which secured by financial guarantees
						c
1 Loans and advances*	32,685,417	5,185,042	4,103,405	1,081,636	-	
2 Debt securities	22,446,658	-	-	-	-	
3 Total	55,132,074	5,185,042	4,103,405	1,081,636	-	
4 Of which non-performing exposures	43,706,859	34,302	34,302	0	-	
EU-5 Of which defaulted	43,706,859	34,302				

* In accordance with EBA guidelines amounts in table EU CR3 include deposits on demand.

Table EU CR4 – standardised approach – Credit risk exposure and CRM effects

Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
	a	b	c	d	e	f
1 Central governments or central banks	23,154,005	649	24,817,207	249	825,135	3.32
2 Regional government or local authorities	1 511	100 285	1 511	50 013	10 305	20.00
3 Public sector entities	1 694	2 129	1 693	836	1 261	49.88
4 Multilateral development banks	2 206 300	-	2 206 300	-	-	-
5 International organisations	-	-	-	-	-	-
6 Institutions	2 544 425	387 618	668 168	137 022	97 548	12.12
7 Corporates	10 564 433	9 612 948	10 564 333	3 188 580	13 535 021	98.42
8 Retail	4 874 415	5 625 676	4 874 415	37 214	3 677 739	74.88
9 Secured by mortgages on immovable property	2 947 567	188 550	2 947 567	43 311	1 634 246	54.64
10 Exposures in default	188 829	2 883	188 829	722	208 121	111.03
11 Exposures associated with particularly high risk	96 156	-	96 156	-	144 234	150.00
12 Covered bonds	-	-	-	-	-	-
13 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
14 Collective investment undertakings	-	-	-	-	-	-
15 Equity	1 160	-	1 160	-	1 160	100.00
16 Other items	1 210 596	-	1 210 596	-	843 899	69.71
17 TOTAL	47 784 106	15 920 737	47 570 950	3 457 948	20 961 208	41.12

Table EU CR5 – standardised approach

Exposure classes	Risk weight															Total	Of which unrated
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others		
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
1 Central governments or central banks	23,731,370	-	-	-	821,773	-	1	-	-	-	-	264,312	-	-	-	24,817,456	250,342
2 Regional government or local authorities	-	-	-	-	51,525	-	-	-	-	-	-	-	-	-	-	51,525	1,518
3 Public sector entities	-	-	-	-	10	-	2,518	-	-	-	-	-	-	-	-	2,528	2,528
4 Multilateral development banks	2,206,300	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,206,300	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	94,431	414,437	-	-	199,587	-	94,786	-	-	1,949	-	-	-	-	-	805,190	241,268
7 Corporates	-	-	-	-	-	-	2,500	-	-	13,750,414	-	-	-	-	-	13,752,913	12,188,655
8 Retail exposures	-	-	-	-	-	-	-	-	4,911,629	-	-	-	-	-	-	4,911,629	4,911,629
9 Exposures secured by mortgages on immovable property	-	-	-	-	-	2,013,764	-	-	-	927,609	49,504	-	-	-	-	2,990,878	2,990,878
10 Exposures in default	-	-	-	-	-	-	-	-	-	152,760	43,212	-	-	-	-	195,972	195,972
11 Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	96,156	-	-	-	-	96,156	71,074
12 Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity exposures	-	-	-	-	-	-	-	-	-	1,160	-	-	-	-	-	1,160	1,160
16 Other items	357,834	-	-	-	11,079	-	-	-	-	841,683	-	-	-	-	-	1,210,596	1,210,596
17 TOTAL	26,389,935	414,437	-	-	1,083,973	2,013,764	99,806	-	4,911,629	15,675,575	188,872	264,312	-	-	-	51,042,304	22,065,620

1. Non-performing and forborne exposures

According to Regulation 2021/637, the gross NPL ratio is the ratio of the gross carrying amount of non-performing exposures (NPL) to the total gross carrying amount of loans and advances that are subject to verification of the definition of non-performing exposures (NPEs).

As of 31st December of 2021, the Group's gross NPL ratio was 4.24%.

Non-performing and forbearance exposures are defined in Commission Implementing Regulation (EU) No. 2021/451 of 17 December 2020 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 supervisory reports of institutions and repealing Implementing Regulation (EU) No. 680/2014.

The Group presents the following tables regarding the disclosure of information on performing, non-performing, forbidden and foreclosed exposures, in accordance with Commission Implementing Regulation (EU) 2021/637: EU CR1: Performing and non-performing exposures and related provisions, EU CR2: Changes in the stock of non-performing loans and advances, EU CQ1: Credit quality of forborne exposures, EU CQ3: Credit quality of performing and non-performing exposures by past due days, EU CQ4: Quality of non-performing exposures by geography, EU CQ5: Credit quality of loans and advances to non-financial corporations by industry.

Group does not have collateral obtained by taking possession and execution processes.

Table EU CR1: Performing and non-performing exposures and related provisions*

	Gross carrying amount/nominal amount				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions								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				Accumulated partial write-off	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	Of which stage 2	Of which stage 3						
005 Cash balances at central banks and other demand deposits	6,205,871	6,205,871	--	-	-	--	(46)	(46)	--	-	-	-	-	-	-	-
010 Loans and advances	20,391,772	18,647,078	1,744,695	902,731	-	902,731	(182,337)	(64,190)	(118,147)	(709,382)	-	(709,382)	-	5,150,740	34,302	
020 Central banks	-	-	--	-	-	--	-	-	--	-	-	-	-	-	-	-
030 General governments	3,212	3,212	0	-	-	--	(4)	(4)	--	-	-	-	-	0	-	
040 Credit institutions	932,275	932,273	2	-	-	--	(1,515)	(1,515)	(0)	-	-	-	-	740,985	-	
050 Other financial corporations	1,771,325	1,771,323	2	-	-	--	(2,627)	(2,627)	(0)	-	-	-	-	3	-	
060 Non-financial corporations	10,605,626	9,691,918	913,708	423,909	-	423,909	(70,612)	(24,581)	(46,031)	(311,267)	-	(311,267)	-	2,002,131	26,919	
070 Of which SMEs	4,083,749	3,883,154	200,595	307,898	-	307,898	(21,707)	(9,518)	(12,189)	(226,951)	-	(226,951)	-	1,131,933	22,708	
080 Households	7,079,334	6,248,351	830,983	478,822	-	478,822	(107,579)	(35,463)	(72,116)	(398,115)	-	(398,115)	-	2,407,620	7,383	
090 Debt securities	22,446,658	22,446,658	--	-	-	--	(799)	(799)	--	-	-	-	-	-	-	
100 Central banks	3,498,300	3,498,300	--	-	-	--	-	-	--	-	-	-	-	-	-	
110 General governments	13,222,483	13,222,483	--	-	-	--	-	-	--	-	-	-	-	-	-	
120 Credit institutions	1,663,202	1,663,202	--	-	-	--	-	-	--	-	-	-	-	-	-	
130 Other financial corporations	3,878,425	3,878,425	--	-	-	--	(720)	(720)	--	-	-	-	-	-	-	
140 Non-financial corporations	184,248	184,248	--	-	-	--	(79)	(79)	--	-	-	-	-	-	-	
150 Off-balance-sheet exposures	15,948,831	14,425,225	1,523,606	5,816	-	5,816	(30,977)	(14,634)	(16,342)	(2,934)	-	(2,934)	-	1,028,009	23	
160 Central banks	-	-	--	-	-	--	-	-	--	-	-	-	-	-	-	
170 General governments	103,493	103,444	50	-	-	--	(114)	(114)	(0)	-	-	-	-	130	-	
180 Credit institutions	320,373	320,225	148	-	-	--	(141)	(141)	(0)	-	-	-	-	-	-	
190 Other financial corporations	189,288	188,445	843	-	-	--	(146)	(141)	(5)	-	-	-	-	122	-	
200 Non-financial corporations	9,660,658	9,326,437	334,220	1,649	-	1,649	(17,247)	(11,667)	(5,581)	(255)	-	(255)	-	1,019,251	23	
210 Households	5,675,019	4,486,675	1,188,344	4,168	-	4,168	(13,329)	(2,572)	(10,756)	(2,679)	-	(2,679)	-	8,506	-	
220 Total	64,993,133	61,724,832	3,268,301	908,547	-	908,547	(214,158)	(79,669)	(134,489)	(712,315)	-	(712,315)	-	6,178,748	34,325	

* Debt securities include financial assets in the form of securities valued at amortized cost with a gross carrying amount of PLN 1,856 million as at December 31, 2021. From the credit risk assessment perspective, these instruments do not differ from loans and advances. As of December 31, 2021, all these exposures were in the serving category

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

	Gross carrying amount
010 Initial stock of non-performing loans and advances	985,311
020 Inflows to non-performing portfolios	237,232
030 Outflows from non-performing portfolios	(319,812)
040 Outflows due to write-offs	(62,527)
050 Outflow due to other situations	(257,286)
060 Final stock of non-performing loans and advances	902,731

Table EU CQ1: Credit quality of forborne exposures

	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	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures		
		Of which defaulted	Of which impaired					
Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010 Loans and advances	89	116,870	116,870	116,870	(3)	(67,383)	10,361	10,361
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	-	-	-	-	-	-	-	-
060 Non-financial corporations	-	87,234	87,234	87,234	-	(43,494)	9,813	9,813
070 Households	89	29,636	29,636	29,636	(3)	(23,889)	549	549
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	367	367	367	-	(219)	23	23
100 Total	89	117,236	117,236	117,236	(3)	(67,602)	10,384	10,384

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

	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		
Cash balances at central banks and other demand deposits	6,205,871	6,205,871	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	20,391,772	20,371,060	20,712	902,731	261,711	53,635	77,219	22,766	300,320	25,240	161,840	902,731
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	3,212	3,212	0	-	-	-	-	-	-	-	-	-
040 Credit institutions	932,275	932,275	-	-	-	-	-	-	-	-	-	-
050 Other financial corporations	1,771,325	1,771,324	1	-	-	-	-	-	-	-	-	-
060 Non-financial corporations	10,605,626	10,603,517	2,109	423,909	18,258	7	9,286	16,965	288,733	15,526	75,134	423,909
070 Of which SMEs	4,083,749	4,083,488	261	307,898	14,065	7	4,046	1,515	248,306	6,879	33,081	307,898
080 Households	7,079,334	7,060,732	18,602	478,822	243,453	53,628	67,933	5,801	11,586	9,714	86,706	478,822
090 Debt securities	22,446,658	22,446,658	-	-	-	-	-	-	-	-	-	-
100 Central banks	3,498,300	3,498,300	-	-	-	-	-	-	-	-	-	-
110 General governments	13,222,483	13,222,483	-	-	-	-	-	-	-	-	-	-
120 Credit institutions	1,663,202	1,663,202	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	3,878,425	3,878,425	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	184,248	184,248	-	-	-	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	15,948,831	-	-	5,816	-	-	-	-	-	-	-	5,816
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	103,493	-	-	-	-	-	-	-	-	-	-	-
180 Credit institutions	320,373	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	189,288	-	-	-	-	-	-	-	-	-	-	-
200 Non-financial corporations	9,660,658	-	-	1,649	-	-	-	-	-	-	-	1,649
210 Households	5,675,019	-	-	4,168	-	-	-	-	-	-	-	4,168
220 Total	64,993,133	49,023,589	20,712	908,547	261,711	53,635	77,219	22,766	300,320	25,240	161,840	908,547

Table EU CQ4: Quality of non-performing exposures by geography

	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					
010 On-balance-sheet exposures	43,741,161	902,731	902,731	902,731	(892,517)		-
011 Poland	39,244,876	902,371	902,371	902,371	(882,380)		-
012 United Kingdom	827,055	-	-	-	(1,763)		-
013 Irland	471,141	-	-	-	(203)		-
014 Luxembourg	464,169	-	-	-	(668)		-
015 Other countries	2,733,920	360	360	360	(7,503)		-
	-	-	-	-	-		-
080 Off-balance-sheet exposures	15,954,647	5,816	5,816		(32,723)		
081 Poland	14,631,934	5,816	5,816		(32,863)		
082 Irland	356,177	-	-		(168)		
083 Luxembourg	285,463	-	-		(191)		
084 United Kingdom	173,203	-	-		(96)		
085 Other countries	507,871	0	0		594		
	-	-	-		-		
150 Total	59,695,809	908,547	908,547	902,731	(892,517)	(32,723)	-

Table EU CQ5: Credit quality of loans and advances by industry

	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			
010 Agriculture, forestry and fishing	87,010	-	-	(260)	-
020 Mining and quarrying	182,478	-	-	(293)	-
030 Manufacturing	4,526,169	250,728	250,728	(214,434)	-
040 Electricity, gas, steam and air conditioning supply	1,326,022	-	-	(2,261)	-
050 Water supply	12,906	334	334	(362)	-
060 Construction	182,503	68,685	68,685	(49,544)	-
070 Wholesale and retail trade	2,521,056	62,713	62,713	(65,141)	-
080 Transport and storage	42,577	28,726	28,726	(28,561)	-
090 Accommodation and food service activities	6,083	39	39	(44)	-
100 Information and communication	663,174	747	747	(1,849)	-
110 Financial and insurance activities	-	-	-	-	-
120 Real estate activities	237,565	3,225	3,225	(3,818)	-
130 Professional, scientific and technical activities	769,104	1,061	1,061	(6,391)	-
140 Administrative and support service activities	209,196	-	-	(248)	-
150 Public administration and defense, compulsory social security	-	-	-	-	-
160 Education	4	-	-	(0)	-
170 Human health services and social work activities	40,963	-	-	(47)	-
180 Arts, entertainment and recreation	1	-	-	(0)	-
190 Other services	222,723	7,650	7,650	(8,625)	-
200 Total	11,029,534	423,909	423,909	(381,878)	-

2. The impact of COVID-19 on the Group's functioning

Information on the impact of the COVID-19 pandemic on the Group's operations is discussed in detail in the Semi-Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended December 31, 2021, in note 3 " Risk Management ", in the section Credit Risk and in the Report on Activities of Bank Handlowy w Warszawie S.A. and of the Capital Group of Bank Handlowy w Warszawie S.A. in 2021.

The Group presents detailed information on exposures subject to aid measures related to the COVID-19 crisis in Tables 1-2 in accordance with the requirements set out in Annex 3 to the EBA/GL/2020/07 Guidelines:

- Table No. 1 – Information on loans and advances subject to legislative and non-legislative moratoria (template 1),
- Table No. 2 – Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria (template 2),
- Table No. 3 – Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis (template 3).

Table 1. Template 1: Information on loans and advances subject to legislative and non-legislative moratoria

	Gross carrying amount							Accumulated impairment, accumulated negative changes in fair value due to credit risk							Gross carrying amount
	Performing				Non performing			Performing				Non performing			
	Of which: exposures with forbearance measures		Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days		Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days		Inflows to non-performing exposures	
Loans and advances subject to moratorium	783,844	688,695	-	158,921	95,150	10,841	2,757	(94,856)	(22,082)	-	(17,325)	(72,774)	(8,389)	(2,464)	78,120
of which: Households	606,464	512,637	-	75,738	93,827	9,518	1,434	(88,201)	(16,609)	-	(12,160)	(71,592)	(7,207)	(1,282)	78,120
of which: Collateralised by residential immovable property	203,517	197,987	-	15,484	5,531	1,234	-	(2,221)	(907)	-	(713)	(1,314)	(685)	-	4,233
of which: Non-financial corporations	177,381	176,058	-	83,183	1,323	1,323	1,323	(6,655)	(5,473)	-	(5,165)	(1,182)	(1,182)	(1,182)	-
of which: Small and Medium-sized Enterprises	92,093	92,093	-	2,686	-	-	-	(518)	(518)	-	(228)	-	-	-	-
of which: Collateralised by commercial immovable property	160,482	160,482	-	83,183	-	-	-	(5,393)	(5,393)	-	(5,165)	-	-	-	-

Table Template 2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria

	Number of obligors	Gross carrying amount							
		Of which: legislative moratoria	Of which: expired	Residual maturity of moratoria					
				<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year	
Loans and advances for which moratorium was offered	10,109	789,911	-	-	-	-	-	-	-
Loans and advances subject to moratorium (granted)	10,009	783,844	709	783,136	709	-	-	-	-
of which: Households		606,464	709	605,755	709	-	-	-	-
of which: Collateralised by residential immovable property		203,517	-	203,517	-	-	-	-	-
of which: Non-financial corporations		177,381	-	177,381	-	-	-	-	-
of which: Small and Medium-sized Enterprises		92,093	-	92,093	-	-	-	-	-
of which: Collateralised by commercial immovable property		160,482	-	160,482	-	-	-	-	-

Table Template 3: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis

	Gross carrying amount	Maximum amount of the guarantee that can be considered		Gross carrying amount
	of which: forborne	Public guarantees received	Inflows to non-performing exposures	
Newly originated loans and advances subject to public guarantee schemes	221,969	-	222,985	476
of which: Households	20,500			-
of which: Collateralised by residential immovable property	-			-
of which: Non-financial corporations	201,469	-	201,946	476
of which: Small and Medium-sized Enterprises	71,930			-
of which: Collateralised by commercial immovable property	-			-

2. Counterparty credit risk

Counterparty risk is incurred from derivative transactions and capital market transactions. For purposes of risk management the Group defines it as pre-settlement risk and settlement risk.

Pre-settlement exposure is defined by PSE measure (Pre-Settlement Exposure, „PSE”), reflecting future potential exposure of the counterparty. PSE reflects maximum expected exposure of the counterparty during the life of the transaction (or transaction portfolio) at the specified confidence level. The distribution of the market value (Mark-to-market) and PSE amount are dependent on market factors determining the values for particular transaction in the customer portfolio. In case there is No. sufficient data, to simulate the value of the transactions’ portfolio more simplified method are used, same as for the purpose of capital requirement calculation.

Pre-settlement risk exposure is managed and reduced through the initial or variation margin deposits as well as conducting transactions using clearing houses.

Moreover, the exposure arising from pre-settlement risk is continuously monitored and is also limited at the aggregate level broken down by product group.

Settlement risk arises when the Group exchanges cash payments to counterparty on a value date and is unable to verify that payments have been received in exchange. The exposure in this case equals the nominal transaction value.

A description of the methodology used to assign internal capital and credit limits for counterparty credit exposures

Internal capital related to counterparty risk related is calculated as 8% of the value of total risk weighted exposures in the trading portfolio, in which internal capital for the following exposure classes: institutions, corporates, regional governments and local authorities administrative bodies and non-commercial undertakings, was estimated according to advanced approach based on internal ratings. For exposures different than mentioned above internal capital requirements were estimated according to standardized approach specified in the Regulation No. 575/2013 (SA-CCR). The Group estimates also the level of exposures resulting from counterparty risk in stress scenario. Furthermore pre-settlement & settlement risks are managed by the Group by setting appropriate limits (pre-settlement and settlement) as an integral part of credit approval process. Pre-settlement limits for counterparty specify, among others, tenors and product families and depend on the customer creditworthiness, his financial standing as well as on the level of customer’s knowledge and experience in derivative transactions, forecasted currency position/ other position which requires hedging and related product needs and on the level of derivative transactions already concluded with other banks.

The level of settlement limit which may be approved is determined by the customer’s risk rating. For a vast majority of transactions the Group adopted ‘delivery versus payment’ (DVP) principle which mitigate settlement risk through not paying the counterparty until Group confirms receipt of the payment or delivery of an instrument by a client. The internal settlement limits are availed in specific and justified cases.

A description of policies for securing collateral and establishing credit reserves as well as a description of policies with respect to specific wrong-way risk exposures

The Group's policies for securing collateral vary according to the counterparty business segment. Most common form of collateral accepted to mitigate credit risk of counterparty, with whom the derivative transactions ("transactions") are entered, is financial securing in the form of transfer of the rights to cash or security deposit according to Art. 102 of Banking Act (cash deposit). The amount of security depends on the difference of the current Mark to Market value of a transaction and a limit agreed. In principle, margining in the form of cash due to its nature does not expose the Group to the risk of unfavourable changes in collateral value. Generally the transactions are provided under frame agreements, which in case of breach by counterparty allow for an early termination of transaction by the other party and settlement the positive and negative values of transactions covered by given frame agreement in one net amount. The exposure resulting from counterparty risk together with other exposures is included in the periodical credit analysis of a customer.

The Group applies credit value adjustment to the market value of a derivative contract to take into account the credit risk of the counterparty. All Commercial and Corporate Banking Subsector customers are taken into account for derivatives assessment correction calculation

The Group differentiates the valuation of counterparty risk due to the availability of CDS quotations:

- a) Credit Risk of Counterparties, for which there is active market of CDS. It is considered that CDS quotations reflect market valuation of credit risk.
- b) Credit Risk of Counterparties, for which there isn't active market of CDS. Based on credit rating (external or internal, if external isn't available) and economic sector, in which client is operating, CDS index value, which reflects market valuation of risk, is attributed to the counterparty.

The Group applies standardized method for calculating counterparty credit risk requirement (SA-CCR).

The Group does not enter into agreements, which would require providing additional collateral in case of lowering its credit ratings.

Table EU CCR1 – Analysis of CCR exposure by approach

	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
EU-1 EU - Original Exposure Method (for derivatives)	-	-		1.40	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.40	-	-	-	-
1 SA-CCR (for derivatives)	427,555	792,861		1.40	2,352,340	1,708,582	1,708,582	1,366,397
2 IMM (for derivatives and SFTs)				-	-	-	-	-
2a Of which securities financing transactions netting sets				-	-	-	-	-
2b Of which derivatives and long settlement transactions netting sets				-	-	-	-	-
2c Of which from contractual cross-product netting sets				-	-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					1,037,500	31,009	31,009	-
5 VaR for SFTs					-	-	-	-
6 Total					3,389,840	1,739,592	1,739,592	1,366,397

Table EU CCR2 – Transactions subject to own funds requirements for CVA risk

	Exposure value	RWEA
1 Total transactions subject to the Advanced method	-	-
2 (i) VaR component (including the 3× multiplier)	-	-
3 (ii) stressed VaR component (including the 3× multiplier)	-	-
4 Transactions subject to the Standardised method	523,232	90,853
EU-4 Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5 Total transactions subject to own funds requirements for CVA risk	523,232	90,853

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

Exposure classes	Risk weight											Total exposure value	
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others		
1 Central governments or central banks	70,580	-	-	-	-	-	-	-	-	-	-	-	70,580
2 Regional government or local authorities	-	-	-	-	101	-	-	-	-	-	-	-	101
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	6,385,877	-	-	95,373	449,504	-	-	-	-	-	-	6,930,753
7 Corporates	-	-	-	-	-	-	-	-	1,124,024	-	-	-	1,124,024
8 Retail	-	-	-	-	-	-	-	10	-	-	-	-	10
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	1	-	1
11 Total exposure value	70,580	6,385,877	-	-	95,473	449,504	-	10	1,124,024	1	-	-	8,125,468

Table EU CCR5 – Composition of collateral for CCR exposures

Collateral type	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
1 Cash – domestic currency	-	613,761	-	256,377	-	503,424	-	-
2 Cash – other currencies	-	382,381	-	267,879	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	512,584	-	-
4 Other sovereign debt	-	-	-	-	-	-	-	-
5 Government agency debt	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	-	-	-
7 Equity securities	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	-
9 Total	-	996,143	-	524,256	-	1,016,009	-	-

Table EU CCR8 – Exposures to CCPs

	Exposure value	RWEA
1 Exposures to QCCPs (total)		131,164
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	6,375,707	127,514
3 (i) OTC derivatives	6,329,364	126,587
4 (ii) Exchange-traded derivatives	46,343	927
5 (iii) SFTs	-	-
6 (iv) Netting sets where cross-product netting has been approved	-	-
7 Segregated initial margin	-	
8 Non-segregated initial margin	10,170	203
9 Prefunded default fund contributions	167,914	3,447
10 Unfunded default fund contributions	-	-
11 Exposures to non-QCCPs (total)		-
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13 (i) OTC derivatives	-	-
14 (ii) Exchange-traded derivatives	-	-
15 (iii) SFTs	-	-
16 (iv) Netting sets where cross-product netting has been approved	-	-
17 Segregated initial margin	-	
18 Non-segregated initial margin	-	-
19 Prefunded default fund contributions	-	-
20 Unfunded default fund contributions	-	-

3. Information regarding credit risk mitigation techniques

Information regarding the policies for collateral management and main types of accepted collateral are presented in supplementary note 3, „Risk Management” to the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended 31 December 2021.

The value of collateral is calculated on the basis of estimates provided by the property valuation experts, valuations provided by industry analysts, borrowers’ accounting records, deposit certificates, information from external databases, etc. The Group defines and applies appropriate loan to value ratios for different collateral types in the process of estimating collateral amounts.

The Group reviews in detail the amount of taken collateral at least annually and by the renewal or change in conditions of the transaction.

Additionally the Group monitors if there are shortages in received collateral. Collateral valuation and monitoring is performed by the unit independent of sales units and its frequency depends on collateral type (monthly, quarterly or annually).

In order to diversify risk associated with collateral, the Group accepts various types and forms of collateral:

- In the Consumer the most common type of collateral is residential real estate,
- In the Corporate and Commercial Banking primarily the following types of collateral are accepted:
 - guarantees and warranties,
 - financial security,
 - collateral.

Detailed procedures defining types of collateral acceptable by the Bank, rules on collateral establishment and value determination as well as creation of specialized independent risk unit responsible for collaterals evaluation allowed to develop adequate standards for this process, including e.g.

- Collateral acceptance and appraisal criteria,
- Rules of collateral monitoring process (including inspections)
- Standardized documentation.

Commercial Bank credit procedures describe ratio of the value of the loan to collateral value for each type of security.

The Group periodically monitors if the actual structure of the collateral portfolio in Commercial Bank is compliant with the structure assumed and if the collateral amount is sufficient.

In Corporate Bank expected Loan-to-Value relations are determined each time in credit decision. These relations are also monitored on the on-going basis.

For Retail Banking Sector the basic collateral for mortgage loans is mortgage on Real Estate. Due to time gap between loans disbursement and setting legally effective mortgage the bridge collateral is used.

The valuation of collateral is performed each time based on real estate appraisal requested by the Group. Collateral appraisals are verified by an independent valuation team in accordance with the valuation guidelines of real estate being collateral for real estate loans for retail customers in Retail Banking Sector. The quality of the appraisal team's work is monitored.

In the field of the funded credit protection the Group considers cash collateral and real estates in case of credit risk mitigation of retail exposures in accordance with the principles set in the Regulation No. 575/2013.

Currently only guarantees issued by the Treasury and BGK are recognized by the Group as unfunded credit risk mitigation techniques for capital adequacy calculation.

The Group enters into reverse repo transactions secured entirely by highly liquid debt securities (mainly issued by the Treasury). These transactions are characterized by low market risk level and therefore low market risk concentration due to short maturities.

4. Information regarding application of standardised approach to calculate risk-weighted exposure amounts

The Regulation No. 575/2013 on banks' capital adequacy and Bank's internal policies describe the use of the Group's external ratings and identify external credit assessment institutions whose ratings can be used for the application of the standard method. Currently there are Moody's and Standard & Poors as well as Fitch. Ratings from this three mentioned agencies are used in calculation and reporting process of Capital Requirements for Credit Risk and Counterparty Risk according to standardize method. Currently Group does not use ratings issued by Export Credit Agencies.

Exposure classes for which Bank uses external ratings granted by approved external agency:

- 1) exposures or contingent exposures to central governments and central banks;
- 2) exposures or contingent exposures to local governments and local authorities;
- 3) exposures or contingent exposures to public sector entities;
- 4) exposures or contingent exposures to multilateral development banks;
- 5) exposures or contingent exposures to institutions;
- 6) exposures or contingent exposures to corporates;
- 7) items representing securitisation positions.

Group applies issuer and issue credit assessment according to rules set forth in The Regulation No. 575/2013 on banks' capital adequacy. Consequently for given exposure where a credit assessment exists for a specific issuing programme or facility to which the exposure belongs, this credit assessment is used to determine the risk weight, which is then assigned to that exposure. Otherwise, Group uses a credit assessment that exists for a specific issuing programme or facility to which the exposure does not belong or a general credit assessment that exists for this issuer, provided that it produces a higher risk weight than that which would be applied to exposures without a credit assessment.

5. Information regarding exposure to securitisation positions

Securitization activities are one of the areas of business, which recently gained in importance. Group decided to invest in securities based on economic calculation, measuring return on investment against the potential risks. Securitization is now a standard and widely used product in global markets. Its importance also increases on the Polish market. The Group intends to be an active participant in this market segment.

At the end of 2021 year the total item constituting securitization exposures amounted PLN 1 671 MM Securities purchased by the Group are not traded on the market. The Group intends to maintain investments until the maturity date. The expected maturity date of the securities is November 2023 and July 2024. The Group classifies securitization's assets as receivables from customers in accordance with IFRS 9 and value them at amortized cost. The Group has procedures for defining the processes of approval and monitoring of securitization exposures, which include, in particular:

- Analysis of the originator including the processes of credit and debt collection, qualitative and quantitative analysis, the condition of maintaining a material net economic interest, reputation, data related to the quality of previous securitization,
- Risk analysis of the exposure underlying the securitization position i.e. the quality, concentration, delays in repayment and the level of losses, the level of recovery rates

- The terms and structure of the transaction reducing identified risks and defining the division into tranches, level of support and security, payment streams, events of default and default indicators
- Monitoring including, among others, verification of the quality of the exposures underlying the securitization position, timeliness of payments and service, compliance with the transactions conditions, the financial situation of the institutions participating in the transaction, etc.

Existing Group's commitment in securitized assets is not exposed to market risk due to the accounting treatment applied.

The Group does not use any additional collateral (other than arising from the transaction's structure) and unfunded protection of securitization positions

The Group invests in securitized assets that satisfy the requirements of simple, transparent and standardized securitization (STS), as well as those that do not satisfy the requirements. The Group has No. positions in resecuritization.

The main risk of securitisation transactions is credit risk. Other important risks of the transaction are *inter alia* the risk of early repayment and the risk of partial prepayment (limited by discounting). All of the Group's securitized assets are the most senior positions.

The described risks are relevant to all securitized assets in which the Group is involved, regardless whether they satisfy the STS requirements or not.

Given the above risks, the Group's credit procedures ensure conducting quality monitoring of securitization portfolio on a quarterly basis.

For the assessment of the securitized portfolio, the Group applies internal rating methodology that is based largely on Fitch's methodology.

Risk weighted exposure for securitization portfolio is determined in accordance with the Regulation (EU) 2017/2401 of the European Parliament and of the Council of 12 December 2017 amending Regulation (EU) No. 575/2013 on prudential requirements for credit institutions and investment firms, effective from January 1, 2019. Risk weights are calculated according to the standard method (SEC-SA) with an additional correction for STS securitization.

In relation to possessed securitization positions, the Bank acts as an investor.

Table. EU-SEC1 - Securitisation exposures in the non-trading book

	Institution acts as originator				Institution acts as sponsor				Institution acts as investor				
	Traditional		Synthetic		Traditional		Synthetic		Traditional		Synthetic		
	STS	Non-STS	of which SRT	Sub-total	STS	Non-STS	Synthetic	Sub-total	STS	Non-STS	Synthetic	Sub-total	
	of which SRT	of which SRT											
1 Total exposures	-	-	-	-	-	-	-	-	-	470,931	1,200,475	-	1,671,406
2 Retail (total)	-	-	-	-	-	-	-	-	-	-	1,200,475	-	1,200,475
3 residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-
5 other retail exposures	-	-	-	-	-	-	-	-	-	-	1,200,475	-	1,200,475
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Wholesale (total)	-	-	-	-	-	-	-	-	-	470,931	-	-	470,931
8 loans to corporates	-	-	-	-	-	-	-	-	-	-	-	-	-
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-
10 lease and receivables	-	-	-	-	-	-	-	-	-	470,931	-	-	470,931
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-

Table EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor

	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
1 Total exposures	1,671,406	-	-	-	-	-	-	1,671,406	-	-	-	227,164	-	-	-	18,173	-
2 Traditional securitisation	1,671,406	-	-	-	-	-	-	1,671,406	-	-	-	227,164	-	-	-	18,173	-
3 Securitisation	1,671,406	-	-	-	-	-	-	1,671,406	-	-	-	227,164	-	-	-	18,173	-
4 Retail underlying	1,200,475	-	-	-	-	-	-	1,200,475	-	-	-	180,071	-	-	-	14,406	-
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Wholesale	470,931	-	-	-	-	-	-	470,931	-	-	-	47,093	-	-	-	3,767	-
7 Of which STS	470,931	-	-	-	-	-	-	470,931	-	-	-	47,093	-	-	-	3,767	-
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6. Market Risk

The amount of capital requirements for individual types of market risk are presented below for:

- fx risk,
- general and specific equity risk,
- specific risk for debt securities,
- general interest rate risk.

Table EU MR1 – Market risk under the standardised approach

	RWEAs
Outright products	
1 Interest rate risk (general and specific)	1,048,484
2 Equity risk (general and specific)	21,163
3 Foreign exchange risk	-
4 Commodity risk	-
Options	
5 Simplified approach	-
6 Delta-plus approach	-
7 Scenario approach	-
8 Securitisation (specific risk)	-
9 Total	1,069,647

The information regarding the market risk is disclosed in explanatory note 3 “Risk Management” in section “Market Risk” to the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended 31 December 2021.

7. Operational Risk

Operational risk is understood as risk of loss resulting from inadequate or deficient internal processes, human factors, systems and technology or external events (including the following risk categories: technology, outsourcing, fraud, money laundering and terrorist financing, information security, continuity of business, tax and accounting, product, model, human resources, concentration, conduct, reputational associated with business and market practices, as well as legal, and operational risks inherent in other risk categories and/or managed in separate processes (e.g. credit risk, market risk, counterparty risk, liquidity risk).

Operational risk does not cover strategic risk or the risk of loss resulting solely from authorized judgments made with respect to taking credit, market, liquidity or insurance risk.

For calculation of capital requirement for operational risk Group applies standardised methodology (STA), defined in Regulation No. 575/2013.

The Group doesn't apply advanced methodologies for calculation of capital requirement for operational risk.

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

	a	b	c	d	e
	Relevant indicator				
Banking activities	Year-3	Year-2	Last year	Own funds requirements	Risk exposure amount
¹ Banking activities subject to basic indicator approach (BIA)	-	-	-	-	-
² Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	1,939,556	1,758,141	1,866,685	283,458	3,543,219
3 Subject to TSA:	1,939,556	1,758,141	1,866,685		
4 Subject to ASA:	-	-	-		
⁵ Banking activities subject to advanced measurement approaches AMA	-	-	-	-	-

Information regarding operational risk, as specified in the paragraph 17.3 of Recommendation M on the management of operational risk in banks

With regard to losses impacting financial results, for Retail Banking and Leasing all Events are reported and for the other areas of Group losses exceeding equivalent of USD 1 thousand are reported.

Total Group's gross losses accounted to operational risk cost in Group (absolute value, including gains, excluding recoveries) recorded in the year 2021, split by operational risk event types and categories (in accordance with appendix 1 to Recommendation M) are presented in the table 37.

Table. Total operational risk gross losses by types of events

Events' types and categories	Amount
Clients, Products & Business Practices - Related Events	16,480
Product Design	16,150
Suitability, Disclosure & Fiduciary	266
Business Practices or Market Conduct	64
Employment Practices and Workplace Environment - Related Events	81
Employee Relations	81
Execution, Delivery & Process Management - Related Events	457
Transaction Capture, Execution & Maintenance	405
Monitoring and Reporting	34
Third Party Management - External/Internal	18
External Theft and Fraud	604
Credit Card Fraud	327
Debit/ATM Card Fraud	115
Electronic Banking and Internet Fraud	13
Fraudulent Application - Non Card related	145
Theft of Property	5
Systems & Technology	25
Inadequate Systems Functionality	23
Other Systems & Technology	2
Total	17,647

Gross value of operational losses accounted in the year 2021 (by booking date) amounted to PLN 17 647 thousand. 95% (PLN 16 811M) out of this amount relates to events, which occurred in prior years. Relation of gross losses to Group revenues as of 2021 amounts to 0,75%. The total amount of losses consists of almost 320 registered events (including homogenous events with financial effects not exceeding USD 10M, aggregated on a monthly basis). In terms of severity, in the year 2021 Group registered 2 events >USD 100M. Cumulated losses related to TSUE sentence associated with credit products denominated in foreign currency amounted to PLN 14 321M. Cumulated losses related to TSUE sentence related to refund of fees for early-repaid credit products, occurred in 2020 (2020 losses amounted to PLN 134M), in 2021 increased by PLN 1 893M (event grand total at the end of 2021 – PLN 2 027M). In the bucket >USD 20M and <USD 100M Group registered 2 events. The remaining events didn't exceed USD 20M.

All operational risk events exceeding set significance thresholds are analyzed by independent control units in view of root causes and corrective actions. Corrective actions are monitored by management to avoid repetitive losses. The Group undertakes series of actions aiming at operational risk mitigation such as verification of adequacy of applied controls, enhancements to control processes in areas of identified weaknesses, enhancements of fraud detection systems, revision of limits mitigating risk exposure, strengthening of independent verifications, enhancements to maker/checker controls and staff training. Members of the Management Board approval is required for all losses exceeding established thresholds, in view of analyses of causes of the losses and adequacy of corrective actions.

Risk appetite limit set for the year 2021 was not exceeded.

The information regarding the operational risk is disclosed in explanatory note 3 "Risk Management" to the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended 31 December 2021.

VII. Information related to the liquidity

Liquidity risk management

Liquidity risk is the risk that the Group may be unable to meet on time its financial obligations towards a client, lender or an investor as a result of the mismatches in cash flows due to the balance and off-balance sheet positions that the Group has at a given date.

The liquidity risk management policy in the Group primarily aims to ensure and maintain the ability to meet both: current and future financial obligations (also in the event of extremely stressed conditions), while minimizing the cost of obtaining liquidity. This is possible due to the proper identification of the liquidity risk, its constant monitoring as well as the establishment of limits with full understanding of: the macroeconomic environment, the Group's business profile, regulatory requirements as well as, strategic and business objectives within available liquidity resources.

The liquidity risk strategy, including the acceptable risk level, assumed balance sheet structure and financing plan is approved by the Bank's Management Board and then accepted by the Bank's Supervisory Board. The management of the Group's balance sheet structure is managed by the Asset and Liability Management Committee (ALCO). The organization of the liquidity risk management process that exists in the Group, is aimed to ensure the separation of functions between entities that conduct transactions (affecting the liquidity risk), monitor and control the risk. The management of intraday, current and short-term liquidity is a task of the Financial Markets and Corporate Banking Sector, while the management of medium and long-term liquidity lies on ALCO responsibilities. Reporting functions are performed by the Risk Strategy and Capital Department, while the monitoring and control of the level of liquidity risk is performed by the Market Risk Department. Activities of companies from the Group of the Bank in the area of liquidity risk management are supervised by the Bank by way of delegating its employees to supervisory bodies (supervisory boards) of such affiliates. Supervision over liquidity of companies from the Group of the Bank is exercised by ALCO.

The source data and models used to generate liquidity reports come from independent management systems or other independent record systems. The reports and stress tests are generated on a daily bases by the Risk Strategy and Capital Department - a unit independent from the Financial Markets and Corporate Banking Sector – and sent to the Group's units responsible for the liquidity risk management and to the Market Risk Department, who is responsible for the substantive content of those reports, including recognition of all elements that affect the liquidity risk. On monthly bases, the Market Risk Department prepares the analysis of the Group's liquidity position and liquidity risk level for the Assets and Liabilities Management Committee and the Risk and Capital Management Committee. Daily reports are sent to those who are directly involved in the intraday, current and short-term liquidity management processes. Monthly and quarterly reports are prepared on the basis of daily data and are submitted to the members of the Bank's Committees that deal with medium- and long-term liquidity risk and structural liquidity risk (the Assets and Liabilities Management Committee and the Risk and Capital Management Committee). Such organization ensures:

- current and forward looking information;
- gives a picture of the liquidity risk for the total balance and off-balance sheet and for the relevant for the Bank currencies (PLN, USD, EUR);
- the diversity of prepared reports allows to assess the level of intraday, current and structural liquidity risk,
- obtaining stress test results with a sufficient frequency (daily for the S2 and monthly for the remaining ones);
- comprehensiveness of the approach in the preparation of the liquidity reports covering both balance and off-balance sheet items.

As a part of the liquidity risk management, the Group pursues the following goals:

- providing Group's entities (at any time) with an access to the liquid funds in order to meet all their financial obligations in a timely manner, also in extreme but probable crisis situations;
- maintaining an adequate level of high-quality liquid assets in the event of a sudden deterioration of the Group's liquidity position;
- defining the scale of the liquidity risk undertaken by the Group by establishing, at an appropriate and safe level, internal measures and limits aimed at limiting excessive concentration in the scope of the adopted balance sheet structure or sources of financing;
- constant monitoring of the Group's liquidity situation with respect to the occurrence of an emergency situation in order to launch the Contingency Funding Plan;
- ensuring compliance of the processes operating at the Bank with the Polish and European regulatory requirements regarding liquidity risk management.

As part of liquidity risk management, the Group also applies a number of control mechanisms ensuring compliance with the liquidity risk management principles. They include in particular:

- separation of the function of measuring, monitoring and controlling risks from operating activities, including separation of functions in areas of potential conflicts of interest and areas of increased risk level;
- reviews of processes, performed by persons performing management functions or managerial functions or delegated by these persons;
- control activities integrated into the operations of the Bank's organizational units and adapted to the profile, scale and specificity of the operations of the Bank's organizational units;
- checking that the exposure limits are met and tracking cases when they are breached;
- monitoring the reports with excesses;
- monitoring of risk indicators;
- self-evaluation process;
- monitoring and testing of contingency funding plans and continuity of business plans.

The main source of funding the Group's activity, including liquid assets portfolio, is deposit base, where at end of December 2021 deposits constituted 70,3% of total liabilities. The Group maintains buffer of unencumbered high quality assets at high level, investing in sovereign bonds and liquid bonds issued by highly rated corporations. Every year the Group performs analysis if held bond portfolio is possible to liquid at the market condition, in order to set amount of bonds possible to liquidate within timeframe compliant with local regulatory liquidity measure calculation as well as LCR calculation.

The Group constantly monitors funding concentration. To realize that target, the structure of funds is well diversified in each segment of deposits – retail, small enterprises, corporations and public finance sector. The concentration is monitored in break down for client categories and currencies and it is compared to an early warning triggers approved by ALCO. In addition to that there is an early warning trigger for net funding on wholesale market applied.

The Group is one of the biggest market participants on Polish derivative market, however net flows on that instruments in 30 days are irrelevant for LCR. Simultaneously the Group's methodology of evaluating potential outflows of margin deposits from the Group to other entities or potential decrease of margin deposits kept by Bank's customers bases on maximal outflows within last 24 months and it secures Bank from underestimation of outflows within 30 days.

In accordance with the Regulation No. 575/2013 the Group monitors and maintains an adequate level of Liquidity Coverage Ratio (LCR). As of December 31, 2021 LCR was 169% and was 13 % points lower than as of December 31, 2020. The change in the ratio is primarily influenced by changes in the level of liquid assets and the level of deposits from non-financial enterprises.

The Group recognizes that the depth of the FX swap market allows the assumption that the existing mismatch (the excess of FX liabilities over assets) can be easily eliminated by means of current FX swaps. Additionally, the Group does not identify other significant components of the net outflow coverage ratio than those included in the net coverage coverage disclosure formula.

Detailed data on the volume of regulatory measures for 2021, as well as the applied internal measures in the area of the liquidity risk management, are included in the Semi-annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A for the financial year ended 31 Dec 2021 in explanatory note no. 3 "Risk Management" in the section "Liquidity risk".

As the result of the assessment of the level of liquidity risk and current and structural liquidity ratios (ILAAP), documented during the review of the Risk Management System (meeting of the Risk and Capital Management Committee in March 2021) and the Assets and Liabilities Management Committee in the process of adopting the annual "Financing and Liquidity Plan" (plan for 2022 reviewed and approved in December 2021), the Bank did not recommend any changes to the existing liquidity risk limits, considering that they are appropriate to the profile and scale of the Bank's operations.

Table EU LIQ1 – Quantitative information of LCR

Scope of consolidation: consolidated		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	31.12.2021	30.09.2021	30.06.2021	31.03.2021	31.12.2021	30.09.2021	30.06.2021	31.03.2021
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					30,998,059	30,883,467	30,191,064	29,754,596
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	17,814,784	17,437,527	16,984,578	16,571,644	1,394,743	1,358,621	1,318,229	1,286,516
3	Stable deposits	10,317,915	10,208,592	10,020,285	9,784,767	515,896	510,430	501,014	489,238
4	Less stable deposits	7,496,869	7,228,935	6,964,294	6,786,877	878,847	848,191	817,215	797,278
5	Unsecured wholesale funding	28,605,429	29,140,418	29,393,095	30,513,103	10,689,370	11,374,418	11,816,130	12,916,102
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	21,356,280	20,878,635	20,380,956	19,793,295	5,339,070	5,219,659	5,095,239	4,948,324
7	Non-operational deposits (all counterparties)	7,249,149	8,261,783	9,012,139	10,719,807	5,350,300	6,154,759	6,720,891	7,967,778
8	Unsecured debt	-	-	-	-	-	-	-	-
9	Secured wholesale funding					-	429	5,699	6,003
10	Additional requirements	50,003,054	44,764,951	38,385,688	36,882,590	39,204,647	33,726,455	27,062,439	25,309,677
11	Outflows related to derivative exposures and other collateral requirements	38,229,837	32,734,185	26,047,141	24,281,441	38,229,837	32,734,185	26,047,141	24,281,441
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	11,773,217	12,030,766	12,338,547	12,601,149	974,811	992,271	1,015,299	1,028,236
14	Other contractual funding obligations	429,732	362,274	343,555	242,987	429,732	343,900	309,125	201,900
15	Other contingent funding obligations	3,509,053	3,393,252	3,265,710	3,124,624	350,905	339,325	326,571	312,462
16	TOTAL CASH OUTFLOWS					52,069,397	47,143,148	40,838,193	40,032,660
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	96,462	124,219	203,606	318,353	22	62,401	134,922	258,739
18	Inflows from fully performing exposures	1,709,753	1,572,210	1,395,845	1,572,940	1,389,899	1,190,798	983,804	1,114,197
19	Other cash inflows	35,936,863	30,804,076	24,153,932	22,333,744	35,936,863	30,804,076	24,153,932	22,333,744
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	TOTAL CASH INFLOWS	37,743,078	32,500,505	25,753,383	24,225,037	37,326,784	32,057,275	25,272,658	23,706,680
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	37,743,078	32,500,505	25,753,383	24,225,037	37,326,784	32,057,275	25,272,658	23,706,680
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					30,998,059	30,883,467	30,191,064	29,754,596
22	TOTAL NET CASH OUTFLOWS					15,303,028	15,470,316	15,695,404	16,325,980
23	LIQUIDITY COVERAGE RATIO					202.56	199.63	192.36	182.25

Table EU LIQ2: Net Stable Funding Ratio

	Unweighted value by residual maturity				Weighted value
	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items					
1 Capital items and instruments	6,665,927	-	-	-	6,665,927
2 <i>Own funds</i>	6,665,927	-	-	-	6,665,927
3 <i>Other capital instruments</i>		-	-	-	-
4 Retail deposits		18,548,153	43,484	10,711	17,307,656
5 <i>Stable deposits</i>		11,289,442	-	-	10,724,970
6 <i>Less stable deposits</i>		7,258,711	43,484	10,711	6,582,686
7 Wholesale funding:		27,147,881	20,740	9,779	11,511,463
8 <i>Operational deposits</i>		20,612,898	-	-	10,306,449
9 <i>Other wholesale funding</i>		6,534,983	20,740	9,779	1,205,014
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	71,770	1,585,371	10,199	-	5,100
12 <i>NSFR derivative liabilities</i>	71,770				
13 <i>All other liabilities and capital instruments not included in the above categories</i>		1,585,371	10,199	-	5,100
14 Total available stable funding (ASF)					35,490,146

	a	b	c	d	e
	Unweighted value by residual maturity				Weighted value
	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					780,097,258
EU- Assets encumbered for a residual maturity of one year or more in 15a a cover pool		-	-	-	-
16 Deposits held at other financial institutions for operational purposes		-	-	-	-
17 Performing loans and securities:		5,434,806	718,077	15,042,111	14,220,110
18 <i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		747,001	-	-	-
19 <i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		615,604	-	278,019	339,580
20 <i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		2,080,421	668,201	11,129,606	10,834,476
21 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		-	-	-	-
22 <i>Performing residential mortgages, of which:</i>		43,388	49,876	1,864,101	1,258,297
23 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		43,388	49,876	1,864,101	1,258,297
24 <i>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</i>		1,948,392	-	1,770,385	1,787,758
25 Interdependent assets		-	-	-	-
26 Other assets:		4,636,307	338	2,624,689	2,945,109
27 <i>Physical traded commodities</i>				-	-
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		104,222	104,222	104,222	88,589
29 <i>NSFR derivative assets</i>		-			-
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		4,523,242			226 162
31 <i>All other assets not included in the above categories</i>		8,843	338	2,624,689	2,630,358
32 Off-balance sheet items		-	-	14,458,695	886,292
33 Total RSF					6,665,927
34 Net Stable Funding Ratio (%)					188.46

VIII. Internal Capital Adequacy Assessment

The Group identifies and manages all types of risks in its activity while some of them considering as significant. For all measurable risks that are considered as significant in the Group's activity, the Group estimates and allocates capital. For this purpose the Group implemented process of estimation and allocation of the internal capital covering significant risk in which assessment of capital adequacy is performed (process ICAAP). The Group annually sets Overall Risk Appetite approved by the Management Board and Supervisory Board. Adopted Overall Risk Appetite clearly and consistently communicate the types and levels of risk the Bank is willing to take, within the context of the Bank's articulated business strategies.

The result of the ICAAP is to determine the capital plan which is consistent with approved by the Board and the Supervisory Board financial plan and risk appetite. It specifies the Group's capital needs and goals. Internal Capital is estimated for significant types of risk. The Group allocates internal capital to the particular business units. Risk and Capital Management Committee is responsible for the annual capital planning and ongoing monitoring of capital usage according to established limits.

Overall Risk Appetite is defined as the aggregated level of expected and unexpected losses, that Group is willing to assume to achieve its strategic objectives while maintaining target regulatory capital adequacy ratio Management Board on the basis of risk appetite decides on the level of aggregated limits on particular business units and sub-limits on measurable risks treated as significant.

Below we present the specific, measurable risks identified as significant in the Group in 2021:

- credit risk,
- counterparty credit risk,
- market risk in the trading book,
- interest rate risk in the banking book,
- liquidity risk,
- operational risk,
- compliance risk,
- technology Risk & Information security risk (including CoB, and cyber Risk),
- outsourcing risk,
- misappropriation risk/Fraud Risk,
- staffing (human capital risk),
- operational errors/processing.

The Group assesses the internal capital for a base case and a downside scenario, which is a basis for the stress tests' analysis.

Scenarios are defined on the basis of the set of assumptions common to all risks analyzed. In addition, the Group analyzes a one in ten year's scenario (1/10), which forms a basis for additional risk / return measure.

The internal capital requirements for credit and counterparty risk were estimated according to advanced approach based on internal ratings for the following exposure classes: exposures to institutions, corporates, regional governments and local authorities and public sector entities. For exposures different than mentioned above internal capital requirements were calculated according to standardized approach specified in the Regulation No. 575/2013. Capital requirement for operational risk has been calculated using standardized methodology approach specified in the Regulation No. 575/2013. Calculated capital requirement, according with the accepted methodology, was increased by add-on, as stress tests showed necessity to increase internal capital for operational risk.

Internal capital for market risk in trading book is based on an integrated measure, which takes into account both the value at risk (VaR), and the size of losses in stress scenarios, estimating unexpected loss on the trading portfolio with the probability of 99.9% in 1Y time horizon. In the case of banking book (accrual) portfolios quantification of internal capital, is based on a combination of potential maximum decrease in net interest income of the bank in the perspective of one year in conjunction with the maximum negative impact of changes in interest rates on the economic value of the bank's capital, determined in stress scenarios with the probability of 99.9% in 1Y time horizon.

In the case of liquidity risk, the amount of internal capital allocation is based on current and projected elements of supervisory measures, taking into account the stress scenarios within the next 12 months.

The Group does not use diversification effect while aggregating estimated internal capital for significant risks.

The Group adopted proper methods for capital allocation to the business units.

The organisational units engaged in the process of assessment of internal capital are required to ensure adequate level of internal control in the capital calculation process for significant risks. Audit Department conducts independent review of the process of capital assessment and maintenance.

The Banks's capital adequacy assessment process in the form of "Internal Capital Adequacy Assessment Process (Capital Group of Bank Handlowy w Warszawie S.A.)" document is approved by the Management Board.

Risk and Capital Management Committee is responsible for ongoing capital adequacy assessment. The Committee supervises the compliance with Overall Risk Appetite established by the Supervisory Board and monitors capital adequacy taking into account the quantitative ratios and capital limits utilization.

Risk and Capital Committee of the Supervisory Board receives periodically report on assessment and utilizations of internal and regulatory capital.

If determined within the Overall Risk Appetite level of capital adequacy ratio falls below approved threshold or the Group does not have enough capital to cover internal capital allocation for significant risks, the contingency capital plan will be activated.

IX. Unencumbered assets

For the purposes of these disclosures assets are encumbered, when they are pledged or used as collateral or as enhancement of transaction's credit quality and their transferability is restricted.

As at 31 December 2021 the Group had encumbered assets due to negative valuation of derivative transactions and securities and received credit collateral.

Table EU AE1 - Encumbered and unencumbered assets

	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA	
	010	030	040	050	060	080	090	100
010 Assets of the disclosing institution	1,583,993	438,962			59,568,186	30,122,896		
030 Equity instruments	-	-	-	-	143,143	-	143,142	-
040 Debt securities	438,962	438,962	438,962	438,962	19,747,546	17,828,250	19,747,546	17,828,250
050 of which: covered bonds	-	-	-	-	-	-	-	-
060 of which: securitisations	-	-	-	-	1,726,276	-	1,726,276	-
070 of which: issued by general governments	438,962	438,962	438,962	438,962	12,285,313	12,285,313	12,285,313	12,285,313
080 of which: issued by financial corporations	-	-	-	-	5,520,063	3,793,787	5,520,063	3,793,787
090 of which: issued by non-financial corporations	-	-	-	-	193,020	-	193,020	-
120 Other assets	1,145,031	-			39,677,497	12,294,646		

Table EU AE2 - Collateral received and own debt securities issued

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
				Fair value of collateral received or own debt securities issued available for encumbrance	
		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA	
		010	030	040	060
130	Collateral received by the disclosing institution	-	-	1,868,113	530,876
140	Loans on demand	-	-	261,762	-
150	Equity instruments	-	-	2,002	-
160	Debt securities	-	-	530,876	530,876
170	of which: covered bonds	-	-	-	-
180	of which: securitisations	-	-	-	-
190	of which: issued by general governments	-	-	530,876	530,876
200	of which: issued by financial corporations	-	-	-	-
210	of which: issued by non-financial corporations	-	-	-	-
220	Loans and advances other than loans on demand	-	-	97,315	-
230	Other collateral received	-	-	976,158	-
240	Own debt securities issued other than own covered bonds or securitisations	-	-	-	-
241	Own covered bonds and securitisations issued and not yet pledged	-	-	-	-
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	1,583,993	438,962	-	-

Table AE3 - Sources of encumbrance

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
	010	030
010 Carrying amount of selected financial liabilities	879,891	1,143,855

Debt instruments measured at fair value through other comprehensive income include encumbered assets that constitute a reserve against the funds guaranteed to the Bank Guarantee Fund, debt instruments being a collateral in repo transaction, assets that serve as collateral for the settlement of derivative instruments in the Euroclear clearing house.

Other assets disclosed above secure settlement of derivatives transactions and stock market transactions. The terms and conditions of the transactions executed to date are standard and typical for such dealings. EHQLA and HQLA are: instrument recognized by NBP as collateral in repo transactions, balance in central banks decreased by obligatory reserve and cash. Debt instruments measured at fair value through other comprehensive income include encumbered assets that constitute a reserve against the funds guaranteed to the Bank Guarantee Fund, debt instruments being a collateral in repo transaction, assets that serve as collateral for the settlement of derivative instruments in the Euroclear clearing house. Other assets disclosed above secure settlement of derivatives transactions and stock market transactions. The terms and conditions of the transactions executed to date are standard and typical for such dealings. EHQLA and HQLA are: instrument recognized by NBP as collateral in repo transactions, balance in central banks decreased by obligatory reserve and cash.

Encumbered assets in form of debt instrument blocked by clearing houses or margin deposits result from derivatives transactions concluded by the Bank. Repurchase agreements are commonly used as a tool for short-term financing of interest-bearing assets, depending on the prevailing interest rates. Reverse repurchase agreements on the other hand are entered into as a facility to provide funding to customers.

X. Leverage Ratio

Information on the leverage ratio as of June 30, 2021, summary reconciliation of accounting assets and leverage ratio exposures, leverage ratio common disclosure, split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) are presented in the following tables in accordance with Commission Implementing Regulation (EU) 2021/637:

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

	Applicable amount
1 Total assets as per published financial statements*	63,863,175
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4 (Adjustment for temporary exemption of exposures to central banks (if applicable))	-
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)	-
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7 Adjustment for eligible cash pooling transactions	-
8 Adjustment for derivative financial instruments	240,158
9 Adjustment for securities financing transactions (SFTs)	-
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	4,230,730
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12 Other adjustments	-1,994,029
13 Total exposure measure	66,340,034

* The amount of assets has been presented in accordance with the EBA guidelines and is equal to the total assets in the FINREP statements and not the total assets presented in the financial statements. The difference between these values is due to the offsetting effect of derivatives. In the consolidated statement of financial position, all liabilities and assets of the Group resulting from forward and derivative transactions settled by the central counterparty of KDPW_CCP S.A. are reported as netted (offsetting liabilities and assets).

Table EU LR2 - LRCOM: Leverage ratio common disclosure

	CRR leverage ratio exposures	
	31.12.2021	30.09.2021
On-balance sheet exposures (excluding derivatives and SFTs)		
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	54,471,990	55,584,377
2 Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(522,810)	(216,501)
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5 (General credit risk adjustments to on-balance sheet items)	-	-
6 (Asset amounts deducted in determining Tier 1 capital)	(1,149,050)	(1,146,252)
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	52,800,129	54,221,624
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	5,335,613	5,119,355
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	3,119,786	3,674,806
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b Exposure determined under Original Exposure Method	-	-
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11 Adjusted effective notional amount of written credit derivatives	-	-
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13 Total derivatives exposures	8,455,400	8,794,160
Securities financing transaction (SFT) exposures		
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1,037,500	291,551
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16 Counterparty credit risk exposure for SFT assets	-	-
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17 Agent transaction exposures	-	-
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	-	-
18 Total securities financing transaction exposures	1,037,500	291,551
Other off-balance sheet exposures		
19 Off-balance sheet exposures at gross notional amount	15,954,647	17,407,522
20 (Adjustments for conversion to credit equivalent amounts)	(11,907,643)	(12,778,495)
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22 Off-balance sheet exposures	4,047,004	4,629,027

Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Total exempted exposures)	-	-
Capital and total exposure measure			
23	Tier 1 capital	5,516,172	5,812,311
24	Total exposure measure	66,340,034	67,936,362
Leverage ratio			
25	Leverage ratio (%)	8,31	8,56
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	8,31	8,56
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	8,31	8,56
26	Regulatory minimum leverage ratio requirement (%)	3,00	3,00
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b	of which: to be made up of CET1 capital	-	-
27	Leverage ratio buffer requirement (%)	-	-
EU-27a	Overall leverage ratio requirement (%)	3,00	3,00
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	fully phased-in definition	fully phased-in definition
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	1,516,354	1,333,615
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	1,037,500	291,551
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)	66,818,888	68,978,426
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)	66,818,888	68,978,426
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)	8,26	8,43
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)	8,26	8,43

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

	CRR leverage ratio exposures
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	53,949,179
EU-2 Trading book exposures	3,210,631
EU-3 Banking book exposures, of which:	50,738,548
EU-4 Covered bonds	-
EU-5 Exposures treated as sovereigns	27,023,507
EU-6 Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	3,205
EU-7 Institutions	1,043,766
EU-8 Secured by mortgages of immovable properties	2,947,567
EU-9 Retail exposures	4,874,415
EU-10 Corporates	10,563,786
EU-11 Exposures in default	195,250
EU-12 Other exposures (eg equity, securitisations, and other non-credit obligation assets)	4,087,052

XI. Information regarding the remuneration policy

At Bank Handlowy w Warszawie S.A. (Bank) and at Dom Maklerski Banku Handlowego S.A. (DMBH) – subsidiary of the Bank – are binding respectively the “Remuneration policy for employees of Bank Handlowy w Warszawie S.A.” (dated 22 December 2017 with subsequent amendments) and “Remuneration policy for employees of Dom Maklerski Banku Handlowego S.A.” (dated 3 January 2018 with subsequent amendments), hereinafter referred to as the Remuneration Policy. The above Remuneration Policies have replaced the Remuneration policies for the key Persons, including persons that have material impact on the risk profile, existing in the Bank and DMBH.

The Remuneration Policy for Members of the Management Board and Members of the Supervisory Board of Bank Handlowy w Warszawie S.A. sets out the principles for remunerating Members of the Management Board and Members of the Supervisory Board of Bank, contributes to implementation of the strategy of the Bank, effective risk management, it’s long-term interest and stability. The Policy implements provisions regarding shaping of the rules of remuneration set forth in the provisions of Act of 29 July 2005 on public offering, conditions governing the introduction of financial instruments to organised trading, and on public companies with further amendments.

The Remuneration Policy sets out principles adopted by Bank and DMBH all other employees including in particular Key Persons and aimed among others to align compensation practices, structures and decisions with shareholder interest and effective manage risk by encouraging prudent decision-making. This Policy implements requirements of the provisions of law, Rules of Corporate Governance for Supervised Institutions adopted by the Polish Financial Supervision Authority and the Code of Best Practice for WSE Listed Companies 2016, recommendations of the Polish Financial Supervision Authority covering banking sector and takes into account Guidelines of the European Banking Authority on sound remuneration policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No. 575/2013, Guidelines of the European Banking Authority on remuneration policies and practices related to the sale and provision of retail banking products and services, Guidelines of European Securities and Markets Authority on remuneration policies and practices (MiFID).

Principles for remuneration of employees that have a material impact on the risk profile in the Bank and DMBH are described in details in the “Remuneration policy for persons whose professional activities have a material impact on the risk profile of Bank Handlowy w Warszawie S.A.” which was adopted by the Management Board and approved by the Supervisory Board of the Bank on December 22, 2017 and the “Remuneration policy for persons whose professional activities have a material impact on the risk profile of Dom Maklerski w Warszawie S.A.” which was adopted by the Management Board and approved by the Supervisory Board of DMBH on January 3, 2018 (hereinafter referred to as “Remuneration Policy for Identified Staff”), both policies with subsequent amendments, that have replaced “Variable remuneration components policy for managerial staff at Bank Handlowy w Warszawie S.A.” binding from September 26, 2012 and “Variable remuneration components policy for managerial staff at Dom Maklerski Banku Handlowego S.A.” binding from March 3, 2012.

In the work on preparation and implementation of both polices mentioned above were involved:

- the members of the Bank’s Nomination and Remuneration Committee,
- the Bank’s and DMBH’s Management Board,
- the head of the Banks’s Legal Department and DMBH Legal Team,
- the head of the Banks’s Human Resources Department,

- the Bank's and DMBH manager of the Compensation & Benefits Department,
- and, for the first version of the policy - as an external Bank's and DMBH consultant, the law firm "Clifford Chance Janicka, Krużewski, Namiotkiewicz i wspólnicy spółka komandytowa".

Variable remuneration for Bank's Management Board Members is granted by the Supervisory Board and for other employees covered by the "Remuneration Policy for Identified Staff" by the Management Board. It should be noted that the Nomination and Remuneration Committee of the Supervisory Board was established in the Bank. It provides recommendations and opinions on the levels and conditions of variable remuneration of employees covered by the Remuneration Policy for Identified Staff and acknowledges information on the current List of employees whose professional activities have a material impact on the Bank's risk profile. On December 10, 2021 Remuneration Committee was also established in DMBH.

Additionally, each time, in case of the change of the Remuneration Policy for Identified Staff, the BHW Nomination and Remuneration Committee and DMBH Remuneration Committee since its appointment gives their opinion on the changes, including the amounts and components of remuneration, taking into account a cautious and stable risk, capital and liquidity management, and paying special attention to long-term interests of the Bank, the interest of the Bank's shareholders and investors.

In 2021 there were five meetings of the BHW Nomination and Remuneration Committee. In 2021 there were no meeting of Remuneration Committee in DMBH since its appointment in December 10, 2021.

As at December 31, 2021 the BHW Nomination and Remuneration Committee was composed of:

1. Sławomir S. Sikora – Chairman of the Committee,
2. Jenny Grey – Vice Chairman of the Committee,
3. Anna Rulkiewicz – Member of the Committee.

As at December 31, 2021 Composition of DMBH Remuneration Committee is the same as composition of Supervisory Board.

In DMBH decisions related to remuneration and grant of variable remuneration for the Management Board Members are made by the Supervisory Board and for other employees covered by the Remuneration Policy for Identified Staff by the Management Board. Implementation of this policy is subject to at least annual review performed by the function responsible for internal control and risk management. Written report covering the assessment of implementation of Remuneration Policy for Identified Staff is presented to DMBH Supervisory Board.

Each time, in case of the change of the Remuneration Policy for Identified Staff, DMBH Supervisory Board approves the changes, including the amounts and components of remuneration of the Management Board, taking into account a cautious and stable risk, capital and liquidity management, and paying special attention to long-term interests of DMBH, the interest of the DMBH shareholders and investors. In 2020, apart from the assessment of the functioning of the Remuneration Policy, DMBH Supervisory Board adopted resolutions related to the remuneration of Identified Staff on a circulation basis five times.

In 2021, the Bank and DMBH analyzed the roles and responsibilities of their employees in the context of the main risks manageable at the Bank and DMBH as well as the quantitative and qualitative criteria described in the Commission Delegated Regulation (EU) 2021/923 of March 25, 2021 supplementing the Directive of the European Parliament and the European Council 2013/36/EU with regard to regulatory technical standards specifying criteria for determining management responsibilities, control functions, significant business units and significant impact on the risk profile of a significant business unit, and specifying criteria for determining employees or categories of employees whose professional activities affect on the risk profile of these institutions in a manner comparable to that of the employees or categories of employees referred to in Art. 92 sec. 3 of this directive. On this basis, the

established a list of persons who have a significant impact on the Bank's risk profile or, adequately, DMBH and therefore should be subject to the provisions of the Eligible Persons Remuneration Policy. Once a year, by December 31, the current list is submitted to the Management Board and Supervisory Board of the Bank and DMBH, respectively. The list of employees covered by the Eligible Persons Remuneration Policy includes:

- President, Vice-Presidents and the Members of the Management Board of the Bank and DMBH,
- the members of the Risk and Capital Management Committee,
- the members of the Asset-Liability Committee,
- the heads of business lines,
- management staff responsible for control functions in the Bank, i.e. the head of internal audit, the head of compliance division and the heads of risk management, human resources and legal departments,
- other supervisors, whose actions significantly impact assets and liabilities of the Group and which directly influence entering into or changing the contracts and their conditions by the Group,
- other employees who met at least one criterion described in Commission Delegated Regulation.

The philosophy of awarding the persons under the Remuneration Policy for Identified Staff, adopted by the Group, implies the compensation differentiation of particular employees based on the financial and non-financial criteria, such as attitude to take risk and assurance of compliance to reflect their current and future contribution and to supplement mechanisms of efficient risk control by limiting the motivation for taking unreasonable risk impacting the Group and its activities and by rewarding the proper balance between risk and rate of return. According to this philosophy, the payment of variable remuneration to staff under the Remuneration Policy for Identified Staff depends on both the short-term and long-term evaluation of the individual performance and the financial results of the Bank or DMBH or specific organizational unit, whereby the persons responsible for control functions are not assessed for the financial results within business areas they control. The assessment of the Bank's results or results of DMBH is based on the data from three financial years, which takes into account the business cycle of the Bank or DMBH and risk of its economic activities. In case of staff employed less for than 3 years when evaluating the Bank's results and results of DMBH the data includes the span of time from the establishing working relationship. The variable remuneration for 2021, granted January 13, 2022 and February 10, 2022, was divided into non-deferred and deferred portions. The deferred portion is subject to deferral over 4 or 5 years and will be paid out respectively in years 2023-2026 or in years 2023-2028, subject to conditions provided for in the Remuneration Policy for Identified Staff. Information on adopted solutions binding in 2021 was given in Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended 31 December 2021 in the explanatory note 47 "Employee benefits".

Each time, vesting of particular tranches of deferred variable remuneration requires approval of the Supervisory Board in relation to remuneration of the Management Board Members and the Management Board in the relation to remuneration of other employees.

The portion being deferred depends on the amount of the variable remuneration awarded, as follows:

- less than PLN equivalent of EUR 50,000, and at the same time below 1/3 of total compensation (conditions to be met jointly) 100 thousand – No. deferral,
- between PLN equivalent of EUR 50,000100 thousand and equivalent of EUR 500 thousand (in DMBH up to the equivalent of EUR 1 million) – deferral over 4 or 5 years of 40% of the variable remuneration and additionally for phantom award with 6 or 12 months retention period for each tranche of the award,
- above the equivalent of EUR 500 thousand (in DMBH above the equivalent of EUR 1 million) – deferral over 4 or 5 years of 60% of the variable remuneration and additionally for phantom award with 6 or 12 months retention period for each tranche of the award.

The variable remuneration for adopted Remuneration Policy's and Remuneration Policy for Identified Staff's purposes is understood as – in case of the members of the Management Board – discretionary bonus granted by the individual decision of the Supervisory Board, and in case of other Identified Staff – the annual bonus.

At least 50% of the variable remuneration should be awarded in the form of non-cash instruments value of which depends on the financial results of the Bank or DMBH accordingly. This condition is fulfilled by the phantom shares, value of which in case of Bank Handlowy fluctuates depending on the market value of the Bank's shares and in case of DMBH is linked to the value of the DMBH's shares calculated on basis of DMBH book value. The remaining part of the variable remuneration is a cash award, whereby the interests for the period from grant to payment will be accrued to the given tranche of the deferred variable remuneration. Starting from the second year of deferral, to the capital of unpaid tranches of the Deferred Cash Award accrued interest of these tranches will be credited and will be subject to interest until the end of the retention period. In DMBH, in compliance with the Regulation of the Minister of Economic Development and Finance of April 25, 2017 on the internal capital, the risk management system, a supervisory examination programme and supervisory review and assessment, as well as the remuneration policy in brokerage house, in case a share of variable remuneration in fixed remuneration is lower than 50%, only deferred cash variable remuneration is applied.

During the deferral period, employees who are rewarded in Bank's phantom shares are entitled to dividend equivalent payments in respect of any dividends that are declared and paid to ordinary holders of BHW stock, in accordance with the Remuneration Policy for Identified Staff. Employees, who have variable remuneration deferred in DMBH phantom shares, are not entitled to dividend equivalent.

Starting from the day of adoption of the relevant resolution by the General Shareholders Meeting, both at the Bank and DMBH - respectively on June 21, 2016 at the Bank and June 27, 2017 at DMBH – the maximum ratio of variable remuneration to fixed remuneration of the Identified Staff was approved at 1:2.

In 2021 max ratio of average total gross remuneration of Management Board Members to average total gross remuneration of other Bank's employees was set up at the level of 1:38 at the annual basis.

Guaranteed variable remuneration is exceptional, may only occur when hiring new staff, and is limited to the first year of employment of performing a function.

Payment related to termination of employment (including retirement payment or disability retirement benefit and severance pay in connection with the termination of the employment relationship for reasons not attributable to employees) are considered fixed pay. However such payments exceeding the amounts provided in the Collective Labour Agreement and the other collective agreements and regulations defining the rights and obligations of the employment relationship will be considered in the part exceeding the amount in regulations mentioned – a variable remuneration.

Regardless of changes of the deferred variable remuneration's value associated with the fluctuation of the Bank's share price, changes of DMBH book value or accrued interest, the amount of deferred portion of the award to be paid out may be decreased or completely reduced based on decision of Supervisory Board or accordingly of the Management Board in of the following situations:

- standards concerning the guarantee of safe and prudent Bank management in BHW and the competencies and reputation standards in DMBH have not been met the which is verified by determination if:
 - Identified Staff engaged in gross misconduct in connection with his/her employment duties, in particular participated in or was responsible for conduct which resulted in significant losses to the Bank or DMBH; or
 - Identified Staff knowingly engaged in providing materially inaccurate information to the financial statements of the Bank or DMBH; or
 - The Bank or DMBH suffers a material failure of risk management; or
 - The Identified Staff materially violate any risk limits established or revised by senior management and/or risk management.

- In a situation set forth in Art. 142 sec. 1 of the Banking Law in case of Bank's employees and in situation set in w Art. 110zz sec. 1 of the Act on Trading in Financial Instruments dated July 29, 2005 in case of DMBH employees, or
- In case Identified Staff received the Variable Remuneration based on materially inaccurate financial statements, or
- In case the Bank or DMBH has suffered a material downturn in its financial performance; or
- In case of balance sheet loss, threat of insolvency or loss of liquidity by the Bank or DMBH.

The acquisition of the right to each tranche of deferred variable remuneration will depend on the Bank's results or DMBH results accordingly in the calendar year directly preceding the date of awarding of the right to given tranche ("Year Concerning the Results").

If the Bank or DMBH accordingly suffers a loss calculated as a loss before tax for the Year Concerning the Results, then the Long-term Bonus in the Phantom Shares, to which the right may be earned during the calendar year following the end of the Year Concerning the Results, will be reduced (but not below zero) by a percentage defined as:

- (i) the absolute value of the loss before tax suffered by the Bank or DMBH accordingly in the given Year Concerning the Results, divided by
- (ii) the absolute value of the highest profit before tax made by the Bank or DMBH accordingly in the period covering three calendar years before the proper Year Concerning the Results, Irrespective of the above, if the Bank or DMBH accordingly suffers any loss calculated as the loss before tax for the Year Concerning the Results, the minimum percentage reduction of 20% will be applied.

The amount of profit (or loss) before tax for each adequate Year Concerning the Results will be the total value of profit (loss) before income tax for the current operations of the Bank or DMBH accordingly. The results for the calendar year will be defined on a basis of the local IFRS statements, which will be covering the audited results for the first three quarters (in accordance with the report to WSE and adequate public authorities), and the last quarter of the year will consist of the actual results for the first two months of this quarter and the estimates for the last month. The estimates will be defined by the Financial Department of the Bank or DMBH accordingly and they will be final and binding regardless of the actual final results.

If the absolute value of the loss before tax suffered by the Bank or DMBH accordingly for the Year Concerning the Results equals or exceeds the total value of the highest profit before tax in the Group's calendar year in the Measurement Period, then the Authorized Persons will not earn the rights to the given tranche.

Based on the above information and based on own judgment as well as after review by the Nomination and Remuneration Committee when applicable, the Supervisory Board in relation to the members of the Management Board or the Management Board in relation to other Identified Staff takes final relevant decisions on the acquiring of right to a given tranche of Deferred Variable Remuneration.

In 2021 Supervisory Board after obtaining Nomination and Remuneration Committee opinion positively assessed functioning of remuneration policy in the Bank. Outcome of this assessment was covered in Report on the activity of the Supervisory Board of the Bank.

Due to information provided by Citigroup on April 15, 2021 on planned strategic changes in consumer banking segment ("GCB"), Management Board of the Bank adopted policy that would allow a grant of an award for recognizing former input of employees whose support will be crucial to deliver strategic changes for part of Bank Handlowy w Warszawie S.A. (consumer banking segment) - Transaction Award Policy. On December 3, 2021 by decision of the Supervisory Board, Transaction Award Policy was updated among others by new structure of the variable remuneration.

For Participants of Transaction Award who are Identified Staff all provisions of Remuneration Policy for Identified Staff and provisions of Regulation of the Minister of Finance, Funds and Regional Policy of June 8, 2021 on the Risk Management System and the System of Internal Control and Remuneration Policy apply, unless they are less strict than the ones provided in Transaction Award Policy.

Please see below for quantitative information

Table 1. EU REM1 - Remuneration awarded for the financial year*

		MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	11	11	80
2		Total fixed remuneration	2,433	12,811	38,997
3		Of which: cash-based	2,224	11,655	35,336
4		(Not applicable in the EU)	-	-	-
EU-4a		Of which: shares or equivalent ownership interests	-	-	-
5		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-
EU-5x		Of which: other instruments	-	-	-
6		(Not applicable in the EU)	-	-	-
7		Of which: other forms	208	1,157	3,661
8	(Not applicable in the EU)	-	-	-	
9	Variable remuneration	Number of identified staff	11	11	80
10		Total variable remuneration	-	11,687	18,889
11		Of which: cash-based	-	6,134	12,656
12		Of which: deferred	-	3,206	2,941
EU-13a		Of which: shares or equivalent ownership interests	-	-	-
EU-14a		Of which: deferred	-	-	-
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	-	5,553	6,234
EU-14b		Of which: deferred	-	3,085	2,941
EU-14x		Of which: other instruments	-	-	-
EU-14y	Of which: deferred	-	-	-	
15	Of which: other forms	-	-	-	
16	Of which: deferred	-	-	-	
17	Total remuneration (2 + 10)	2,433	24,498		57,887

*The Members of the Supervisory Board of DMBH and some of the members of the Supervisory Board of the Bank are not graded with the remuneration. The Management Board is defined as Senior Management. Information concerning the Supervisory Board of the Bank contains also the part of remuneration of the Chairman for the time being the President of the Management Board of the Bank.

Table 2. EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff) - The Group has No. cases to be reported.

Table 3. EU REM3 - Deferred remuneration*

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 explicit 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 amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1 MB Supervisory function	3,726	941	2,785	141	560	701	695	440
2 Cash-based	1,960	501	1,459	-29	40	11	501	-
3 Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
4 instruments	1,766	440	1,326	170	520	690	193	440
5 Other instruments	-	-	-	-	-	-	-	-
6 Other forms	-	-	-	-	-	-	-	-
7 MB Management function	4,650	2,060	2,590	321	537	858	2,060	-
8 Cash-based	2,610	1,265	1,345	-68	35	-34	1,265	-
9 Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
10 instruments	2,040	795	1,245	389	503	892	795	-
11 Other instruments	-	-	-	-	-	-	-	-
12 Other forms	-	-	-	-	-	-	-	-
13 Other senior management	-	-	-	-	-	-	-	-
14 Cash-based	-	-	-	-	-	-	-	-
15 Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
16 instruments	-	-	-	-	-	-	-	-
17 Other instruments	-	-	-	-	-	-	-	-
18 Other forms	-	-	-	-	-	-	-	-
19 Other identified staff	6,204	2,603	3,601	450	765	1,214	2,603	-
20 Cash-based	3,260	1,515	1,745	-77	44	-33	1,515	-
21 Shares or equivalent ownership interests	96	25	71	3	-1	2	25	-
22 instruments	2,847	1,062	1,785	524	722	1,246	1,062	-
23 Other instruments	-	-	-	-	-	-	-	-
24 Other forms	-	-	-	-	-	-	-	-
25 Total amount	14,580	5,604	8,976	912	1,862	2,774	5,358	440

* The Awards granted by the Bank in Citi shares before the employee was recognized as Identified Staff include dividend equivalent and fractional shares.

Table 4. EU REM4 - Remuneration of 1 million EUR or more per year

	EUR	Identified staff that are high earners as set out in Article 450(i) CRR
1	1,000,000 to below 1,500,000	2
2	1,500,000 to below 2,000,000	-
3	2,000,000 to below 2,500,000	-
4	2,500,000 to below 3,000,000	-
5	3,000,000 to below 3,500,000	-
6	3,500,000 to below 4,000,000	-
7	4,000,000 to below 4,500,000	-
8	4,500,000 to below 5,000,000	-
9	5,000,000 to below 6,000,000	-
10	6,000,000 to below 7,000,000	-
11	7,000,000 to below 8,000,000	-
x	To be extended as appropriate, if further payment bands are needed.	-

Table 5. EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)*

	a	b	c	d	e	f	g	h	i	j	b	b'	j
	Bank Management body remuneration			Bank Business areas							DMBH		Group
	MB Supervisory function	MB Management function	Total MB	Financial Markets & Corporate Banking Sector	Retail Banking Sector	Transactions Banking Sector	Financial Management Sector	Support Sector (excl. Compliance Division and Audit Department)	Operations & Technology Sector	Independent internal control functions - Risk Sector, Compliance Division and Audit Department	MB Management function	Other Eligible Persons	Total
1 Total number of identified staff													99
2 Of which: members of the MB	8	7	15								4	-	
3 Of which: other senior management				-	-	-	-	-	-	-			
4 Of which: other identified staff				29	5	5	4	3	3	25			
5 Total remuneration of identified staff	972	21,589	22,561	28,692	4,386	3,339	2,224	2,361	1,963	13,710	2,909	1,210	
6 Of which: variable remuneration	-	11,106	11,106	11,489	1,786	760	517	535	540	3,141	581	122	
7 Of which: fixed remuneration	972	10,483	11,455	17,203	2,600	2,579	1,708	1,826	1,423	10,569	2,329	1,088	

* The Members of the Supervisory Board of DMBH and some of the members of the Supervisory Board of the Bank are not graded with the remuneration. The Management Board is defined as Senior Management. In accordance with the Policy of Identified Staff, the control function is defined as internal audit, compliance and risk management.

XII. Declaration of the Management Board of Bank

The Management Board of Bank Handlowy w Warszawie S.A hereby:

- declares that, to the best of its knowledge, the information disclosed in the document "Information on capital adequacy of the Capital Group of Bank Handlowy w Warszawie S.A. as at December 31, 2021 " in accordance with part eight of Regulation No. 575/2013, are adequate to the actual state; the adequacy of risk management arrangements at the Bank ensures that the applied risk management systems are appropriate from the point of view of the risk profile and strategy of the Bank and the entire Group.
- approves this document "Information on capital adequacy of the Capital Group of Bank Handlowy w Warszawie S.A. as at December 31, 2021 ", which includes information on risk, discusses the overall risk profile of the Bank and the Group related to the business strategy, and includes key indicators and figures that provide external stakeholders with a comprehensive view of the Group's risk management, including the interaction between the Bank's risk profile and the risk appetite, defined by the Management Board and approved by the Supervisory Board.

Members of Management Board

23.03.2022 Date	Elżbieta Światopełk-Czetwertyńska Name	a/The President of Management Board Position/Function
23.03.2022 Date	Natalia Bożek Name	Vice-president of Management Board Position/Function
23.03.2022 Date	Dennis Hussey Name	Vice-president of Management Board Position/Function
23.03.2022 Date	Maciej Kropidłowski Name	Vice-president of Management Board Position/Function
23.03.2022 Date	Barbara Sobala Name	Vice-president of Management Board Position/Function
23.03.2022 Date	Katarzyna Majewska Name	Member of Management Board Position/Function