

Disclosures regarding capital adequacy of mBank S.A. Group as at 31 March 2023



Warsaw, 10th May 2023

Contents

1.	Introduction	3
2.	Scope of prudential consolidation.....	4
3.	Own funds	5
4.	Capital requirement.....	8
5.	Liquidity risk.....	13
6.	Transitional arrangements regarding IFRS 9.....	15
7.	Transitional arrangements in response to the COVID-19 pandemic	15

1. Introduction

This document is issued under the disclosure requirements resulting from Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012 (the CRR Regulation), which formed the legal basis of the reporting date i.e. 31 March 2023.

This document contains information on the prudential consolidated basis of the mBank SA Capital Group (mBank Group) in accordance with the requirements set out in Article 13 of the CRR Regulation. The information shall be published in accordance with the following provisions:

- 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 (Regulation 2021/637),
- Guidelines EBA/GL/2014/14 of 23 December 2014 on materiality, proprietary and confidentiality and on disclosure frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) No 575/2013,
- Guidelines EBA/GL/2020/12 of 11 August 2020 amending disclosure guidelines EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 as regards transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds to ensure compliance with the CRR 'quick fix' in response to the COVID-19 pandemic,
- Disclosure Policy of mBank S.A. on capital adequacy available on website www.mbank.pl.

If not stated specifically further in the document, all amounts are presented in PLN thousand.

2. Scope of prudential consolidation

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

The accounting policies applied for the preparation of the prudentially consolidated financial data for first quarter 2023 are the same as those, which have been applied to prepare the mBank S.A. Group Consolidated Financial Report for the first quarter of 2023, which included Condensed Consolidated Financial Statements of mBank S.A. Group for the first quarter of 2023, with exceptions of consolidation rules described below.

Entities included in prudential consolidation were taken into account in the process of calculation of consolidated own funds and consolidated own funds requirements as at 31 March 2023 in accordance with the CRR Regulation.

Entities included in prudential consolidation are defined in the CRR Regulation as institutions, financial institutions or ancillary services undertakings, which are subsidiaries or undertakings in which a participation is held, except for entities in which the total amount of assets and off-balance sheet items of the undertaking concerned is less than the smaller of the following two amounts:

- EUR 10 million;
- 1% of the total amount of assets and off-balance sheet items of the parent undertaking or the undertaking that holds the participation.

Prudentially consolidated financial data as at 31 March 2023 include the following entities:

1. mBank S.A.
2. mBank Hipoteczny S.A.
3. mFaktoring S.A.
4. mFinanse S.A.
5. mFinanse CZ s.r.o.
6. mFinanse SK s.r.o.
7. mLeasing Sp. z o.o.
8. Future Tech Fundusz Inwestycyjny Zamknięty
9. mElements S.A.
10. Asekum Sp. z o.o.
11. LeaseLink Sp. z o.o.
12. mTowarzystwo Funduszy Inwestycyjnych S.A.

Detailed information on consolidated entities included in consolidation is presented in mBank S.A. Group Consolidated Financial Report for the first quarter of 2023, in the Note 1 Information regarding the Group of mBank S.A.

The scope of entities included in prudential consolidation as of 31 March 2023 is the same as the scope of entities included in accounting consolidation based on International Financial Reporting Standards (IFRS).

3. Own funds

The consolidated own funds consist of Common Equity Tier 1 capital, Additional Tier 1 capital and Tier 2 capital. Items that could be treated as Additional Tier 1 capital are not identified in mBank Group, therefore the own funds of mBank Group constitute the sum of consolidated Common Equity Tier 1 capital and Tier 2 capital.

The difference in the amount of own funds observed over the first quarter of 2023 compared to the amount of own funds as of 31 December 2022 was caused by decrease in the excess of the threshold amount of deferred tax assets referred to in Art. 48 of the CRR Regulation, and inclusion in own funds of an adjustment for current adjustments for specific credit risk. Starting January 2023, the transitional provisions for the temporary treatment of unrealised gains and losses on financial instruments at fair value through other comprehensive income in relation to pandemic COVID-19, contained in 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 ("Transitional Provisions"), ceased to apply in the calculation of own funds. Discontinuation of the use of Transitional Provisions in calculation of the own funds as of 31 March 2023 was offset by a positive impact of valuation of debt instruments at fair value through other comprehensive income.

EU KM1 – Key metrics template, addressing disclosure requirements of Article 447 (a) to (g) and Article 438 (b)

		a	b	c	d	e
		31.03.2023	31.12.2022	30.09.2022	30.06.2022	31.03.2022
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	12 091 332	12 153 665	11 247 118	13 059 869	12 666 742
2	Tier 1 capital	12 091 332	12 153 665	11 247 118	13 059 869	12 666 742
3	Total capital	14 278 034	14 403 163	13 610 314	15 365 639	14 967 499
	Risk-weighted exposure amounts					
4	Total risk exposure amount	90 642 854	88 034 372	92 860 518	93 777 897	94 027 961
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	13.34%	13.81%	12.11%	13.93%	13.47%
6	Tier 1 ratio (%)	13.34%	13.81%	12.11%	13.93%	13.47%
7	Total capital ratio (%)	15.75%	16.36%	14.66%	16.38%	15.92%
	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 (%)	1.76%	1.76%	2.12%	2.12%	2.12%
EU-7b	of which: to be made up of CET1 capital (percentage points)	0.99%	0.99%	1.19%	1.19%	1.19%
EU-7c	of which: to be made up of Tier 1 capital (percentage points)	1.32%	1.32%	1.59%	1.59%	1.59%
EU-7d	Total SREP own funds requirements (%)	9.76%	9.76%	10.12%	10.12%	10.12%
	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 (%)	0.12%	0.10%	0.07%	0.05%	0.05%
EU-9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU-10a	Other Systemically Important Institution buffer (%)	0.50%	0.50%	0.50%	0.50%	0.50%
11	Combined buffer requirement (%)	3.12%	3.10%	3.07%	3.05%	3.05%
EU-11a	Overall capital requirements (%)	12.88%	12.86%	13.19%	13.17%	13.17%
12	CET1 available after meeting the total SREP own funds requirements (%)	5.99%	6.49%	4.52%	6.27%	5.80%
	Leverage ratio					
13	Total exposure measure	233 679 716	223 249 811	219 358 906	216 071 495	216 563 991
14	Leverage ratio (%)	5.17%	5.44%	5.13%	6.04%	5.85%
	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)	57 049	53 516	55 205	58 861	62 863
EU-16a	Cash outflows - Total weighted value	34 011	32 778	32 386	31 979	31 655
EU-16b	Cash inflows - Total weighted value	5 103	5 105	4 723	4 583	4 717
16	Total net cash outflows (adjusted value)	28 908	27 673	27 663	27 396	26 939
17	Liquidity coverage ratio (%)	197%	193%	200%	215%	233%
	Net Stable Funding Ratio					
18	Total available stable funding	174 723	170 672	166 508	158 412	158 883
19	Total required stable funding	111 666	113 559	115 293	114 492	113 777
20	NSFR ratio (%)	156%	150%	144%	138%	140%

EU KM1 – Key metrics template recalculated taking into account the retrospective including of profit for the first quarter of 2022 (after PFSA approval), in line with the EBA’s position expressed in Q&A 2018_3822 and Q&A 2018_4085

		a	b	c	d	e
		31.03.2023	31.12.2022	30.09.2022	30.06.2022	31.03.2022
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	12 091 332	12 153 665	11 247 118	13 059 869	13 525 670
2	Tier 1 capital	12 091 332	12 153 665	11 247 118	13 059 869	13 525 670
3	Total capital	14 278 034	14 403 163	13 610 314	15 365 639	15 826 427
	Risk-weighted exposure amounts					
4	Total risk exposure amount	90 642 854	88 034 372	92 860 518	93 777 897	94 223 160
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	13.34%	13.81%	12.11%	13.93%	14.35%
6	Tier 1 ratio (%)	13.34%	13.81%	12.11%	13.93%	14.35%
7	Total capital ratio (%)	15.75%	16.36%	14.66%	16.38%	16.80%
	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 (%)	1.76%	1.76%	2.12%	2.12%	2.12%
EU-7b	of which: to be made up of CET1 capital (percentage points)	0.99%	0.99%	1.19%	1.19%	1.19%
EU-7c	of which: to be made up of Tier 1 capital (percentage points)	1.32%	1.32%	1.59%	1.59%	1.59%
EU-7d	Total SREP own funds requirements (%)	9.76%	9.76%	10.12%	10.12%	10.12%
	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 (%)	0.12%	0.10%	0.07%	0.05%	0.05%
EU-9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU-10a	Other Systemically Important Institution buffer (%)	0.50%	0.50%	0.50%	0.50%	0.50%
11	Combined buffer requirement (%)	3.12%	3.10%	3.07%	3.05%	3.05%
EU-11a	Overall capital requirements (%)	12.88%	12.86%	13.19%	13.17%	13.17%
12	CET1 available after meeting the total SREP own funds requirements (%)	5.99%	6.49%	4.52%	6.27%	5.79%
	Leverage ratio					
13	Total exposure measure	233 679 716	223 249 811	219 358 906	216 071 495	216 642 071
14	Leverage ratio (%)	5.17%	5.44%	5.13%	6.04%	6.24%
	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%

4. Capital requirement

Assessment of adequacy of internal capital – description of the approach

On 4 July 2012 PFSA and Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) granted consent to the application of the advanced internal rating based approach (AIRB approach) by mBank to the calculation of the capital requirement for credit risk for the corporate portfolio and the retail mortgage loan portfolio.

Additionally, on 27 August 2012 BaFin in cooperation with PFSA granted consent to the application of internal rating based approach concerning the risk weighting for specialized lending exposures (IRB slotting approach) by mBank Hipoteczny SA (mBH) to the calculation of the capital requirement for credit risk.

On 6 May 2015 mBank received conditional consent of PFSA to use AIRB approach for retail mortgage loan portfolio (micro companies) and for the portfolio of commercial banks.

On 25 July 2016 mLeasing Sp. o.o. (mLeasing) obtained approval from ECB and PFSA to the application of the AIRB approach to the calculation of capital requirement for credit risk.

On 22 September 2016 mBank SA obtained approval from ECB and PFSA to the application of AIRB approach to the calculation of the capital requirement for credit risk for the specialized lending exposures - income producing real estate.

On 31 January 2018 mBank SA obtained approval from European Central Bank and PFSA to the application of material change in PD model for subsidiary mLeasing.

On 31 March 2021 mBank obtained approval from PFSA for the use of a new LGD model for retail portfolio.

Starting from the process of the calculation of consolidated total capital ratio as at 30 June 2021 mBank Group implemented PFSA requirements (multipliers) related to the recommendations after the implementation of a new default definition.

On March 24, 2022, mBank settled a synthetic securitization transaction carried out on a portfolio of corporate loans with a total value of PLN 8 922 million. As part of this transaction, mBank transferred a significant part to the investor credit risk from the selected securitization portfolio. A selected portfolio of the securitized loans remain on the Bank's balance sheet. The risk of a securitized portfolio is transferred through a recognized credit protection instrument in the form of a credit linked note. The transaction meets the requirements set out in the CRR Regulation regarding the transfer of a significant part of the risk. It has been structured as STS-compliant (simple, transparent and standardized securitization) in line with Regulation 2021/557. The capital requirements for the retained securitization positions are calculated under the Securitization Internal Ratings Based Approach (SEC-IRBA).

On 23 December 2022, the Bank concluded a synthetic securitization transaction referencing a portfolio of corporate as well as small and medium enterprises loans with a total value of EUR 801 million of which 55.3% were credit exposures secured on commercial real estate (CRE). As part of the transaction, the Bank transferred a significant part of the credit risk of a selected securitised portfolio to an investor. The risk transfer of the securitised portfolio is performed through a recognised credit protection instrument, in the form of a credit linked notes. The transaction meets the requirements for significant risk transfer specified in the CRR Regulation.

In the calculation of the total capital requirements of mBank Group as of 31 March 2023, when calculating the credit risk capital charge, the mBank Group applies the AIRB approach pursuant to the provisions of the CRR Regulation and pursuant to obtained AIRB approvals.

Results of the internal capital adequacy assessment

The below information addresses the scope of disclosure from table EU OVC – ICAAP Information set out in Annex I to Regulation 2021/637.

mBank Group adjusts the own funds (both in regulatory and in economic terms) to the level and type of risk, mBank Group is exposed to and to the nature, the scale and the complexity of its operations. For that purpose Internal Capital Adequacy Assessment Process (ICAAP) is realized in mBank Group. The aim of this process is to maintain regulatory own funds (under Pillar I) and own funds under economic perspective (under Pillar II) at the level adequate to the profile and the level of risk in mBank Group's operations.

Capital adequacy is monitored:

- in regulatory terms, with reference to capital ratios, including the leverage ratio (which is described in more detail later in this document); and
- on an economic basis (internal), in relation to calculated internal capital.

Internal capital is the amount of capital estimated by mBank and required to cover all material risks identified in mBank Group's operations. Internal capital is the total sum of the economic capital to cover risks included in economic capital calculation and capital necessary to cover other risks (including hard to quantify risks).

In first quarter of 2023 mBank calculated the economic capital at the 99.91% confidence level over a one-year time horizon for credit, market and business risk. The economic capital for operational risk was calculated using an algorithm based on the Standardised Measurement Approach (SMA) described in the updated Basel III standard: Finalising post-crisis reforms. The Bank also determined capital to cover other risks (including hard to quantify risks). In calculating total internal capital, the Bank did not take into account the effect of diversification between different types of risk.

The internal capital adequacy assessment process runs continuously in mBank Group and includes the following stages implemented by organizational units of mBank and mBank Group subsidiaries:

- risk inventory in mBank Group,
- calculation of internal capital under Pillar II and Pillar I capital requirements to provide for sufficient risk coverage,
- capital aggregation,
- stress tests,
- setting limits on the utilization of capital resources,
- planning and allocation of capital,
- monitoring consisting in a permanent identification of risk involved in the business of mBank Group and the analysis of the level of capital for risk coverage,
- annual process review and assessment.

In order to assess the capital adequacy under economic perspective mBank calculates risk coverage potential (RCP), i.e. economic own funds, in addition to regulatory own funds. Having estimated internal capital as well as RCP both under normal and under stressed conditions Bank determines risk absorbance capacity. On this basis and taking into account the forecast values limits for economic capital for particular risks are determined.

Both the value of the regulatory own funds as well as the value of the risk coverage potential in mBank Group is well above the value of the internal capital.

The main principles of the ICAAP are accepted by the Supervisory Board of mBank. The whole internal capital adequacy assessment process is reviewed annually. The Bank's Management Board is responsible for the review of the ICAAP process in mBank Group.

Supervisory requirements regarding capital ratios

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

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

As of 31 March 2023 mBank Group was obliged to ensure adequate own funds to meet conservation capital buffer of 2.5% of total risk exposure amount, as defined in the Act.

As of 31 March 2023 the countercyclical capital buffer rate set for relevant exposures in Poland according with the article 83 of the Act amounted to 0%. The ratio shall be effective until it is changed by way of an ordinance of the Minister of Finance.

Countercyclical capital buffer in accordance with the provisions of the Act as the weighted average of the countercyclical buffer rates that apply in the countries where the relevant credit exposures of the mBank Group are located. As at the end of March 2023 this ratio amounted to 0.12%.

Exposures of foreign branches in Czech Republic and in Slovakia, where countercyclical buffer rates as of 31 March 2023 amounted to 2.0%, and 1.0% in each, had an impact on the mBank Group specific countercyclical capital buffer.

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

		31.03.2023
1	Total risk exposure amount	90 642 854
2	Institution specific countercyclical capital buffer rate	0.1247%
3	Institution specific countercyclical capital buffer requirement	113 032

In 2016 Bank received an administrative decision of the PFSA (KNF), in which mBank has been identified as other systemically important institution (O-SII). mBank was subject to a capital buffer which on the basis of KNF administrative decision of October 29th, 2020 amounted to 0.50% of the total risk exposure amount, calculated in accordance with article 92(3) of CRR Regulation. The amount of the buffer is verified by the KNF on an annual basis and did not change in 2021, 2022 and 2023. Buffer should be maintained on individual and consolidated levels. This buffer was in force as at 31 March 2023.

Starting from 1st January 2018 the Regulation of the Minister of Development and Finance with regard to systemic risk buffer entered into force. The Regulation introduced systemic risk buffer of 3% of the total risk exposure amount applied to all exposures located in Poland. Due to the exceptional socio-economic situation that arose after the outbreak of the global COVID-19 pandemic, this requirement was lifted by repealing the Regulation of the Minister of Finance, which was in force since 19 March 2020 and was applied as at 31 March 2023.

Consequently, the combined buffer requirement set for the mBank Group as of the end of March 2023 amounted to 3.12% of the total risk exposure amount.

Additionally, as a result of the annual risk assessment carried out in 2022 by the PFSA within the supervisory review and evaluation process (SREP), in particular with regard to the evaluation of risk related to the portfolio of foreign exchange retail mortgage loans, mBank Group received an individual recommendation to maintain own funds on the consolidated level to cover additional capital requirement of 1.76% in order to mitigate the risk and 1.32% for Tier 1 capital (on individual basis: 2.03% and 1.52% respectively). Additional capital requirement in Pillar II encompasses also additional risk factors related to the FX mortgage loan portfolio such as operational risk, market risk or risk of collective default of borrowers.

The high level of additional capital requirement in Pillar II resulted from the fact that the PFSA applied one methodology to all banks in Poland. This did not take into account the results of internal models applied by mBank to the calculation of capital requirements for credit risk. According to PFSA's methodology, the calculation of the additional capital requirement for each and every bank uses the risk weight under the standardised approach as a starting point (risk weight 150%).

Consequently, more than half of the additional capital requirement calculated by the PFSA for mBank Group comes from "aligning" the capital requirement to the requirement calculated under the standardised approach. The second important component with effect on an additional capital requirement within Pillar II was related to the SREP score quantifying the risk of foreign exchange retail mortgage loans portfolio, taking into account the specific nature of the Bank portfolio, the following factors were taken into account:

- the share of loans with LTV >100%,
- the level of margin realized in the Bank on FX retail lending portfolio,
- sensitivity of total capital ratio to exchange rate and interest rate changes,
- Bank's readiness to absorb losses of a potential portfolio currency conversion.

Capital ratios both on consolidated and individual basis in the first quarter of 2023 were above the required values.

With a surplus of own funds mBank Group comfortably meets the additional own funds requirement related to Pillar II and the combined buffer requirement.

Quantitative data regarding capital adequacy

Capital ratios are calculated on the basis of total risk exposure amount that corresponds to the sum of risk exposure amounts for particular risk types that are calculated according to provisions of the CRR Regulation.

mBank S.A. Group

Disclosures regarding capital adequacy as at 31 March 2023

Total risk exposure amount of mBank Group consists of:

- risk weighted exposure amount for credit risk, counterparty credit risk, securitization transactions, dilution risk and free deliveries calculated under AIRB approach as regards the large part of the credit exposures portfolio,
- risk exposure amount for market risk, including position risk, foreign exchange risk and commodities risk calculated under standardised approaches,
- risk exposure amounts for operational risk calculated under standardised approach,
- risk exposure amount for credit valuation adjustments, calculated under standardised approach,
- other risk exposure.

The template below presents all components of the total risk exposure amount of mBank Group, a denominator for capital ratios calculated according with art. 92 of CRR Regulation regard to template EU OV1 in Annex I to Regulation 2021/637 addressing disclosure requirements of Article 438 (d) of the CRR Regulation.

EU OV1 -Overview of RWAs

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		31.03.2023	31.12.2022	31.03.2023
1	Credit risk (excluding CCR)	73 741 846	73 729 404	5 899 347
2	Of which the standardised approach	23 957 352	23 962 179	1 916 588
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	4 439 215	4 323 554	355 137
EU 4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	45 345 279	45 443 671	3 627 622
6	Counterparty credit risk - CCR	1 995 546	1 807 314	159 644
7	Of which the standardised approach	1 221 767	1 383 589	97 742
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	4 275	5 926	342
EU 8b	Of which credit valuation adjustment - CVA	276 988	328 354	22 159
9	Of which other CCR	492 516	89 445	39 401
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	1 452 373	1 560 845	116 190
17	Of which SEC-IRBA approach	1 452 373	1 560 845	116 190
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	-	-	-
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	1 600 916	785 855	128 073
21	Of which the standardised approach	1 600 916	785 855	128 073
22	Of which IMA	-	-	-
EU 22a	Large exposures	-	-	-
23	Operational risk	11 852 173	10 150 954	948 174
EU 23a	Of which basic indicator approach	-	-	-
EU 23b	Of which standardised approach	11 852 173	10 150 954	948 174
EU 23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	3 096 925	3 315 005	247 754
29	Total	90 642 854	88 034 372	7 251 428

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

		Risk weighted exposure amount
		31.03.2023
1	Risk weighted exposure amount as at the end of the previous reporting period	46 394 393
2	Asset size (+/-)	1 069 510
3	Asset quality (+/-)	(552 613)
4	Model updates (+/-)	-
5	Methodology and policy (+/-)	-
6	Acquisitions and disposals (+/-)	-
7	Foreign exchange movements (+/-)	(60 568)
8	Other - launch of the transaction of syntethic securitisation (+/-)	-
9	Risk weighted exposure amount as at the end of the reporting period	46 850 722

5. Liquidity risk

The below table addresses the scope of disclosures from EU LIQB table.

As of March 31, 2023, the LCR ratio of mBank Group reached 224% and in the first quarter of 2023 the LCR measure remained on a safe level, significantly exceeding 100%.

In the first quarter of 2023, the increase in the level of the net liquidity coverage ratio was influenced by the dynamics of development of term deposits and current accounts included in the LCR calculation (an increase of PLN 6.9 billion compared with the previous quarter) compared to a slight increase in lending activity (by PLN 0.4 billion compared with the previous quarter). As a result of these changes, the level of the liquidity buffer remains high in relation to the expected net outflows over a 30-day horizon as at 31 March 2023.

Since the first quarter of 2023 the inflows from secured lending transactions are included in the LCR (as unweighted values). Their inclusion is neutral from the LCR perspective, as they are secured by level 1 liquid assets.

The high-quality liquid assets of mBank in the liquidity buffer (HQLA) used to calculate the LCR ratio consist of only Level 1 assets, including:

- Polish treasury bonds in PLN and EUR,
- bills issued by the National Bank of Poland,
- treasury bonds issued by the central governments of the EU Member States in EUR and CZK, and by the US Treasury in USD,
- German bills issued in EUR,
- bonds issued by the European Investment Bank, and bonds of the Polish Development Fund and Bank Gospodarstwa Krajowego in PLN guaranteed by the State Treasury,
- excess of the required reserve in the National Bank of Poland, the National Bank of Czech and the National Bank of Slovakia,
- funds held at central banks in the form of deposits and reverse repo operations with central banks.

Also mBH maintains liquidity buffer within the mBank Group. The liquidity buffer of mBH consisted of Polish treasury bonds in PLN, NBP bills, and the excess of the required reserve at the National Bank of Poland.

The main source of financing are deposits, which as of March 31, 2023 accounted for 94.59% of all external sources of financing. The deposit base is diversified, and the deposits of the 10 largest customers as of March 31, 2023 accounted for 2.4% of the deposit base. The other sources of financing are:

- own issues,
- subordinated liabilities,
- operations on the interbank market,
- loans.

The mBank Group identifies three significant currencies in accordance with Art. 4(5) of the EU Commission Delegated Regulation 2015/61 and with Art. 415(2) of the CRR Regulation: PLN, CZK and EUR, of which the LCR ratio for which the LCR was above 100%. The significance of CZK and EUR currencies is related to i.a. running two foreign branches in the Czech Republic and Slovakia. The potential currency mismatch is limited at the level of the real liquidity gap in individual currencies.

As of March 31, 2023, the impact of the adverse market scenario on derivatives accounted for 0.58% of the total unweighted outflow value included in the LCR.

mBank S.A. Group

Disclosures regarding capital adequacy as at 31 March 2023

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

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	31.03.2023	31.12.2022	30.09.2022	30.06.2022	31.03.2023	31.12.2022	30.09.2022	30.06.2022
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)					57 049	53 516	55 205	58 861
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	124 742	119 791	117 328	115 306	9 946	9 368	8 998	8 700
3	Stable deposits	86 105	86 328	87 264	87 691	4 305	4 316	4 364	4 385
4	Less stable deposits	38 637	33 463	30 064	27 615	5 641	5 052	4 634	4 315
5	Unsecured wholesale funding	43 537	42 436	42 685	43 257	18 018	17 587	17 861	18 136
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	8 936	9 491	9 814	10 026	2 125	2 260	2 334	2 387
7	Non-operational deposits (all counterparties)	34 380	32 708	32 634	33 012	15 672	15 090	15 290	15 529
8	Unsecured debt	221	237	237	220	221	237	237	220
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	22 062	22 011	21 968	21 793	4 397	4 330	4 223	4 119
11	Outflows related to derivative exposures and other collateral requirements	2 259	2 223	2 110	2 027	2 259	2 223	2 110	2 027
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	19 803	19 788	19 858	19 765	2 138	2 107	2 113	2 091
14	Other contractual funding obligations	1 119	992	823	559	948	817	650	386
15	Other contingent funding obligations	15 860	15 961	15 985	15 998	702	676	654	639
16	TOTAL CASH OUTFLOWS					34 011	32 778	32 386	31 980
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	2 661	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	5 843	5 848	5 497	5 468	4 643	4 634	4 321	4 318
19	Other cash inflows	460	471	402	265	460	471	402	265
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	8 964	6 319	5 899	5 733	5 103	5 105	4 723	4 583
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	8 964	6 319	5 899	5 733	5 103	5 105	4 723	4 583
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					57 049	53 516	55 205	58 861
22	TOTAL NET CASH OUTFLOWS					28 908	27 673	27 663	27 396
23	LIQUIDITY COVERAGE RATIO					197%	193%	200%	215%

6. Transitional arrangements regarding IFRS 9

The Bank decided, for the purpose of capital adequacy calculation, including calculation of own funds, based on Article 1 paragraph 9 of Regulation (EU) 2017/2395 of the European Parliament and of the Council of 12 December 2017 amending the CRR Regulation, not to apply the transitional arrangements, which allows to mitigate the impact on capital related to the introduction of IFRS 9.

The capital ratios reported in this document, including the leverage ratio and Tier 1 capital, fully reflect the impact of IFRS 9 with the exception of transitional arrangements in response to the COVID-19 pandemic in chapter 7 of this document.

7. Transitional arrangements in response to the COVID-19 pandemic

Until 31 December 2022 mBank Group included transitional provisions regarding the temporary treatment of unrealised gains and losses on financial instruments measured at fair value through other comprehensive income in connection with the COVID-19 pandemic, contained in the regulation of the European Parliament and of the Council (EU) 2020/873 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 in the calculation of own funds, capital ratios and leverage ratio.

The application of the transitional provisions was intended to mitigate the negative impact of unrealised losses on government and local government debt instruments during the COVID-19 pandemic and the decision to apply them meant that the Group was able to limit the impact of significant part of the volatility of the market valuation of the government and local government bonds portfolio.

The transitional arrangements ceased to apply from 1 January 2023.

The measures reported calculated taking into account the transitional provisions as well as measures calculated without taking into account the transitional provisions are presented below.

mBank Group	Measures reported		Measures calculated without taking into account transitional provisions	
	31.03.2023	31.12.2022	31.03.2023	31.12.2022
Common Equity Tier 1 capital	12 091 332	12 153 665	n/a	11 807 391
Tier 1 capital	12 091 332	12 153 665	n/a	11 807 391
Own funds	14 278 034	14 403 163	n/a	14 056 888
Common Equity Tier 1 ratio (%)	13.34%	13.81%	n/a	13.41%
Tier 1 capital ratio (%)	13.34%	13.81%	n/a	13.41%
Total capital ratio (%)	15.75%	16.36%	n/a	15.97%
Leverage ratio (%)	5.17%	5.44%	n/a	5.29%

mBank S.A. Group

Disclosures regarding capital adequacy as at 31 March 2023

Representation of the Management Board of mBank S.A.

The Management Board of mBank S.A. declares that, to the best of its knowledge, the information presented in this "Disclosures regarding capital adequacy of mBank S.A. Group as at 31 March 2023" were prepared in accordance with the formal policies and internal processes, as well as, systems and controls agreed upon at the Management Board level, and give a true view of the facts. Furthermore, the risk management arrangements are adequate and give assurance that the risk management systems in use are appropriate in terms of the risk profile and strategy of the mBank Group.

The Management Board of mBank S.A. approves this "Disclosures regarding capital adequacy of mBank S.A. Group as at 31 March 2023".

First and last name	Position	Signature
Cezary Stypułkowski	President of the mBank's Management Board, Chief Executive Officer	(signed electronically)
Krzysztof Dąbrowski	Vice-President of the mBank's Management Board, Head of Operations and IT	(signed electronically)
Cezary Kocik	Vice-President of the mBank's Management Board, Head of Retail Banking	(signed electronically)
Marek Lusztyn	Vice-President of the mBank's Management Board, Chief Risk Officer	(signed electronically)
Julia Nusser	Vice-President of the mBank's Management Board, Chief People & Regulatory Officer	(signed electronically)
Adam Pers	Vice-President of the mBank's Management Board, Head of Corporate & Investment Banking	(signed electronically)
Pascal Ruhland	Vice-President of the mBank's Management Board, Chief Financial Officer	(signed electronically)