Capital Adequacy Disclosures by IPOPEMA Securities S.A.

as at 31 December 2017

Introduction

This document implements the Disclosure Policy of IPOPEMA Securities S.A. (the "Brokerage House", "IPOPEMA Securities", "IPOPEMA", the "Company") and of the IPOPEMA Securities Group (the "Group", "IPOPEMA") with respect to capital adequacy disclosures required under:

- Regulation of the Minister of Finance of November 26th 2009 on disclosure of information related to capital adequacy (the "Regulation"),
- Regulation of the Minister of Development and Finance of April 27th 2017 on internal capital, risk management system, supervisory assessment program and supervisory assessment score, as well as on remuneration policy of brokerage houses,
- Regulation (EU) No. 575/2013 of the European Parliament and of the Council of June 26th 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (the "CRR" (Capital Requirements Regulation)) with subsequent changes,
- Commission implementing regulation (EU) No. 1423/2013 of December 20th 2013 laying down implementing technical standards with regard to disclosure of own funds requirements for institutions according to CRR.

IPOPEMA Securities qualifies as an EU parent institution and has the obligation to comply with capital adequacy standards on the basis of its consolidated situation. IPOPEMA Securities S.A. discloses information on its capital adequacy on a consolidated basis.

The information disclosed in this document is based on the approved full-year consolidated financial statements of the IPOPEMA Group for 2017.

In 2017, the Company had no authorisation from the Polish Financial Supervision Authority to use advanced risk measurement approaches.

1. Risk management objectives and strategies

Strategies and processes with respect to management of specific risks

The risk management process within the Company is based on its internal documents making up a package of regulations named "Risk and Capital Management Policy at IPOPEMA Securities S.A." This package includes, among other things, the "Risk Management Policy" and the "Capital Management Strategy."

The "Risk Management Policy" defines:

- objectives and principles of risk management,
- risk appetite and risk profile,
- stress tests,
- rules governing calculation of consolidated capital adequacy standards,
- rules governing reporting,
- tasks and duties with respect to risk management assigned to the Company's respective bodies and units,
- rules governing disclosure of information related to capital adequacy.

The "Capital Management Strategy" defines:

- rules governing capital management,
- components of own funds,
- capital strategy (defining capital objectives and the capital limit),
- capital contingency plans,

- capital planning process.

The “Internal Capital Adequacy Assessment Process “ defines:
- approach to measurement of materiality of risks,
- rules governing measurement of material risks,
- methodology applied to estimate the internal capital needed to cover all material risks.

The other documents include information on processes of management of specific risks and reporting processes.

As part of the tasks and duties defined in the “Risk Management Policy”, the Compliance Office is required to:
- calculate the regulatory requirement with respect to own funds and calculate the amount of internal capital,
- monitor the capital adequacy of IPOPEMA,
- monitor the use and exceedance of limits defined for specific risks,
- deliver quarterly reports on capital adequacy to the Management and Supervisory Boards.

The dedicated risk control unit at IPOPEMA Securities is its Compliance Office, supported by the financial control unit.

Rules pertaining to the operation of the management information system have been defined in the “Risk and Capital Management Policy at IPOPEMA Securities S.A.”. As part of the system, dedicated units provide current and periodic information to the Management and Supervisory Boards of IPOPEMA Securities.

All the above documents concerning risk management are approved by the Management Board. Apart from that, two of these documents, i.e. the “Capital Management Strategy” and the “Internal Capital Adequacy Assessment Process”, are subject to approval by the Supervisory Board.

Structure and organisation of the risk management function

Supervisory Board

As part of risk management, the IPOPEMA Supervisory Board performs the following activities:
- monitors the effectiveness and efficiency of the risk management system, for instance on the basis of capital adequacy reports it has received,
- accepts the overall risk level by approving internal procedures concerning internal capital assessment processes,
- monitors the consistency of specific risk limits with the overall risk level accepted by the Supervisory Board,
- supervises the consistency of the risk acceptance policy with the business strategy.

Management Board

The IPOPEMA Management Board exercises control over the risk management process and is responsible for its effectiveness. Within its remit, the Management Board:
- implements, monitors and continuously improves the risk management framework in all areas of IPOPEMA’s business,
- ensures preparation and implementation of internal capital assessment, capital management and capital planning processes,
- determines internal quantitative and qualitative limits, as well as individual limits used as a risk management tool,
- procures that the internal strategies and procedures, including the ICAAP process, are reviewed regularly (at least on an annual basis), particularly in the context of the current profile, scale and complexity of IPOPEMA’s business.

Heads of organisational units

Within their respective remits, the heads of organisational units:
- are responsible for implementing and maintaining the risk management framework and guidelines incorporated into the internal regulations of their respective units,
- submit proposals of changes to the risk management strategies and framework if they believe such changes are necessary, for instance due to changes in relevant processes or in the conducted business.

Compliance Office

Within its remit, the Compliance Office:

- calculates, together with the Controlling Office, the total amount of risk exposure as percentage of own funds (capital ratio), supervises and coordinates implementation of the risk management system across the organisation, including processes aimed at risk identification, measurement, monitoring and control,
- calculates, together with the Controlling Office, internal capital and performs stress tests,
- within the capital planning process performs, together with the Controlling Office, the simulation calculation of the capital ratio,
- introduces, coordinates and supervises the following processes: internal capital assessment, capital management, and capital planning,
- monitors IPOPEMA's capital adequacy,
- introduces, coordinates and supervises processes related the operation of the management information system and submission of information to the Polish Financial Supervision Authority,
- monitor the use and exceedance of limits defined for specific risks,
- ensures that the activities carried out by IPOPEMA employees are performed in conformity with the guidelines specified in internal regulations,
- delivers reports on capital adequacy to the Management and Supervisory Boards.

Controlling Office

Within its remit, the Controlling Office:

- calculates, together with the Controlling Office, the total amount of risk exposure as percentage of own funds (capital ratio),
- provides the Compliance Office with financial data necessary to calculate the amount of internal capital, and to perform stress tests,
- performs measurements with respect to liquidity risk (liquidity gap),
- monitors net results on current operations against net result targets (business risk),
- within the capital planning process performs, together with the Compliance Office, the simulation calculation of the capital ratio,
- verifies the calculations of the Compliance Office regarding internal capital.

Internal audit

Duties of the internal audit function include regular checking and assessment of the appropriateness and effectiveness of systems and procedures in place, including the system for managing risks associated with the business operations conducted by IPOPEMA, as well as regular checking and assessment of the implementation of internal regulations to the extent they relate to risk management.

Scope and nature of the reporting system

The role of IPOPEMA's management information system is to provide decision makers with information on material risk factors.

Under the management information system in place at IPOPEMA, dedicated units provide current and periodic information related to IPOPEMA's risk management system to the Management and Supervisory Boards. The scope of such reports has been described in internal documents governing individual elements of the risk management system.

Security and risk mitigation strategy

The security and risk mitigation strategy is pursued through implementation of the following internal regulations and tools:

- The procedure with respect to maintenance of continuous and secure operation of the information systems used in performance of activities related to the brokerage business of IPOPEMA Securities S.A. specifies:
  - rules for protecting the IT systems against unauthorised access,
  - safeguards protecting the hardware and systems against loss of data,
  - rules with respect to continuous operation of the systems,
  - conditions of access to the WSE IT system,
  - emergency procedures with respect to the Brokerage House's IT systems dedicated to the WSE,
  - rules for monitoring the status of connections to the WSE systems.

- The staffing policy of IPOPEMA Securities S.A. specifies the rules for recruitment and supplementary recruitment of employees, monitoring of staffing needs and planning of IPOPEMA's human resources as part of an effective HR policy.
- The risk and capital management policy of IPOPEMA Securities S.A. covers:
  - capital contingency plans,
  - liquidity contingency plans,
  - rules pertaining to the register of operational incidents,
- Whistleblowing mechanism enabling employees to anonymously report any identified irregularities or violations.
- Disaster Recovery Office – comprises a specific number of workstations organised and maintained on stand-by in a separate office, located in an area with restricted access, protected by an access control system, equipped with appropriate infrastructure and made available after an emergency has been reported on terms defined in a relevant agreement with the service provider.

Declaration approved by the management body on the adequacy of risk management arrangements at IPOPEMA Securities

A declaration approved by the Company's Management Body on the adequacy of risk management arrangements at IPOPEMA Securities is attached as Appendix 1 hereto.

Risk statement approved by the management body

A statement approved by the Company's Management Board on the risk profile associated with the business strategy of IPOPEMA Securities is attached as Appendix 2 hereto.

Number of directorships held by members of the management body

In January 2017 four, and from February 2017 three members of the Management Board held directorial positions at the Company's departments.

Recruitment policy and policy on diversity with regard to selection of members of the management body

IPOPEMA Securities' management staff have adequate professional qualifications and many years of experience in service with financial institutions, including brokerage houses. The competences, experience and skills of the IPOPEMA Management Board's Members strictly correspond to the business areas and remits of the departments and organisational units they supervise.

Risk Committee

No separate risk committee has been set up at IPOPEMA Securities S.A.

Flow of risk-related information to the management body

In line with the "Risk Management Policy", under the management information system in place at the Company, dedicated units provide current and periodic information related to IPOPEMA's risk management system to the Management and Supervisory Boards. As part of the abovementioned management information system, the following inter alia are provided on a quarterly basis:

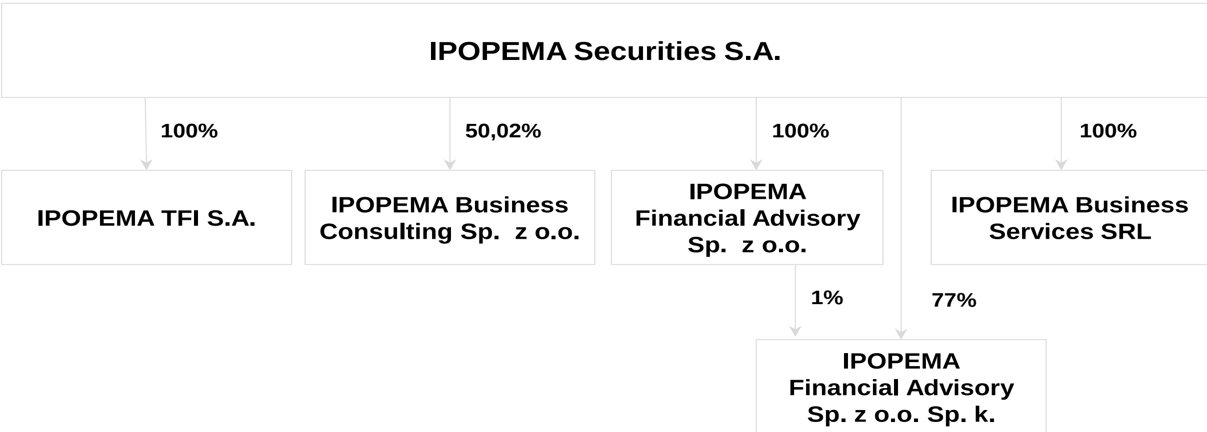
- information on own funds (prepared based on a COREP report),
- information on total risk exposure (prepared based on a COREP report),
- information on internal capital calculated according to the approach outlined in the "Internal Capital Adequacy Assessment Process",
- information on total capital ratio (prepared based on a COREP report),
- information on deviation of own funds from internal capital,
- information on credit risk in the reporting period,
- information on liquidity gap at the end of reporting period,
- information on material operational incidents,

- information on large exposures of the Company at end of reporting periods,
- information on occurrence of large exposures resulting in exceeding of exposure concentration limits within reporting periods,
- information on use of respective exposure limits in the trading book
- information on the number of negative news items on IPOPEMA in the media,
- information on actual revenue from brokerage activities relative to target revenue from brokerage activities.

2. Scope of application of the CRR requirements

Key information on the Brokerage House and its group

IPOPEMA Securities S.A. is the parent of the group consisting also of the following subsidiaries: IPOPEMA Towarzystwo Funduszy Inwestycyjnych S.A., IPOPEMA Business Consulting Sp. z o.o., IPOPEMA Financial Advisory Sp. z o.o., IPOPEMA Financial Advisory Sp. z o.o. Sp. k., and IPOPEMA Business Services Srl (in liquidation).



Outline of the differences in the basis of consolidation

Accounting consolidation

IPOPEMA Securities S.A. is the parent of the Group. IPOPEMA Towarzystwo Funduszy Inwestycyjnych S.A., IPOPEMA Business Consulting Sp. z o.o. and IPOPEMA Financial Advisory Sp. z o.o. Sp. k. are fully consolidated, whereas IPOPEMA Financial Advisory Sp. z o.o., and IPOPEMA Business Services Srl (in liquidation) are excluded from consolidation due to immateriality of their financial data in relation to the Group's financial data.

Prudential consolidation

IPOPEMA calculates the capital adequacy norms on a consolidated prudential basis based on the consolidated prudential financial statements created for this purpose, which are prepared in accordance with International Accounting Standards. In the IPOPEMA Group, there is one subsidiary, which is a financial institution (IPOPEMA TFI), while there are no subsidiaries that meet the criteria of the institution within the meaning of the CRR regulation.

IPOPEMA TFI, the financial institution subsidiary, submits its financial reports to IPOPEMA on a quarterly basis.

These reports include financial data for quarterly periods and year to date.

On the basis of consolidated prudent financial statements, the Controlling Office in consultation with the Compliance Office:

a) draws up the quarterly COREP report in terms of:

- consolidated own funds,
- consolidated own funds requirements,
- consolidated capital ratios and capital levels,
- consolidated complementary items.

b) estimates consolidated internal capital.

Any material practical or legal impediments, whether existing or foreseen, to the prompt transfer of own funds or to repayment of amounts due between the parent and its subsidiaries

No such impediments exist or are currently foreseen.

Total amount of capital shortfalls at all non-consolidated subsidiaries and a list of the subsidiaries

No such shortfalls were recorded.

Financial disclosures

(i) Consolidated full-year financial statements comprising:
- consolidated statement of financial position,
- consolidated statement of comprehensive income,
- consolidated statement of changes in equity,
- consolidated statement of cash flows,
- introduction and notes to the financial statements;

(ii) Auditor's opinion and report on consolidated financial statements.

These disclosures are published on the Brokerage House's website at www.ipopema.pl ('investor relations' section).

3. Own funds

Full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items, as well as filters and deductions applied pursuant to Articles 32−35, 36, 56, 66 and 79 with respect to the institution's own funds and balance sheet in the audited financial statements

Own funds structure

Common Equity Tier 1 capital: Instruments and reserves		
1	Capital instruments and the related share premium accounts	13 345 012,53
	of which: membership interests	-
	of which: ordinary shares	13 345 012,53
	of which: founders' shares	-
	of which: shares conferring voting preference at the GM	-
2	Retained earnings	-
3	Accumulated other comprehensive income and other reserves	63 300 210,16
3a	Funds for general banking risk	-
4	Amount of qualifying items referred to in Article 484(3) and the related share premium accounts subject to phase out from Common Equity Tier 1	-
5	Minority interests (amount allowed in consolidated Common Equity Tier 1)	-
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-
6	**Common Equity Tier 1 before regulatory adjustments**	**76 645 222,69**
Common Equity Tier 1: regulatory adjustments		
7	Additional value adjustments (negative amount)	12 453,28
8	Intangible assets (net of the related tax liability) (negative amount)	2 353 651,24

9	Empty set in the EU	-
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of the related tax liability if the conditions in Article 38(3) are met) (negative amount)	222 082,00
11	Fair value reserves related to gains or losses on cash flow hedges	-
12	Negative amounts resulting from the calculation of expected loss amounts	-
13	Any increase in equity that results from securitised assets (negative amount)	-
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-
15	Defined-benefit pension fund assets (negative amount)	-
16	Direct and indirect holdings by the institution of own Common Equity Tier 1 instruments (negative amount)	-
17	Direct, indirect and synthetic holdings of the Common Equity Tier 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-
18	Direct, indirect and synthetic holdings by the institution of the Common Equity Tier 1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-
19	Direct, indirect and synthetic holdings by the institution of the Common Equity Tier 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-
20	Empty set in the EU	-
20a	Exposure amount of the following items which qualify for a risk weight of 1,250%, where the institution opts for the deduction alternative	-
20b	of which: qualifying holdings outside the financial sector (negative amount)	-
20c	of which: securitisation positions (negative amount)	-
20d	of which: free deliveries (negative amount)	-
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-
22	Amount exceeding the 15% threshold (negative amount)	-
23	of which: direct and indirect holdings by the institution of the Common Equity Tier 1 instruments of financial sector entities where the institution has a significant investment in those entities	-
24	Empty set in the EU	-
25	of which: deferred tax assets arising from temporary differences	-
25a	Losses for the current financial year (negative amount)	-
25b	Foreseeable tax charges relating to Common Equity Tier 1 items (negative amount)	-
27	Qualifying Additional Tier 1 Capital deductions that exceed Additional Tier 1 Capital of the institution (negative amount)	-
28	**Total regulatory adjustments to Common Equity Tier 1**	**2 588 186,52**
29	**Common Equity Tier 1 Capital**	**74 057 036,17**
Additional Tier 1 Capital: instruments		
30	Capital instruments and the related share premium accounts	-
31	of which: classified as equity under applicable accounting standards	-
32	of which: classified as liabilities under applicable accounting standards	-
34	Qualifying Tier 1 capital included in consolidated Additional Tier 1 Capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-
35	of which: instruments issued by subsidiaries subject to phase out	-
36	Additional Tier 1 Capital before regulatory adjustments	-

Additional Tier 1 Capital: regulatory adjustments		
37	Direct and indirect holdings by the institution of own Additional Tier 1 Capital instruments (negative amount)	-
38	Direct, indirect and synthetic holdings of the Additional Tier 1 Capital instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-
39	Direct, indirect and synthetic holdings of the Additional Tier 1 Capital instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-
40	Direct, indirect and synthetic holdings by the institution of the Additional Tier 1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-
41	Empty set in the EU	-
42	Qualifying Tier 2 Capital deductions that exceed Tier 2 Capital of the institution (negative amount)	-
43	**Total regulatory adjustments to Additional Tier 1 Capital**	**-**
44	**Additional Tier 1 Capital**	**-**
45	**Tier 1 Capital (Tier 1 = Common Equity Tier 1 + Additional Tier 1)**	**74 057 036,17**
Tier 2 Capital: instruments and provisions		
46	Capital instruments and the related share premium accounts	-
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from Tier 2 capital	-
48	Qualifying own funds instruments included in consolidated Tier 2 Capital (including minority interests and Additional Tier 1 Capital instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-
49	of which: instruments issued by subsidiaries subject to phase out	-
50	Credit risk adjustments	-
51	**Tier 2 Capital before regulatory adjustments**	-
Tier 2 Capital: regulatory adjustments		
52	Direct and indirect holdings by the institution of own Tier 2 Capital instruments and subordinated loans (negative amount)	-
53	Holdings of the Tier 2 Capital instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-
54	Direct, indirect and synthetic holdings of the Tier 2 Capital instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-
55	Direct, indirect and synthetic holdings by the institution of the Tier 2 Capital instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-
56	Empty set in the EU	-
57	Total regulatory adjustments to Tier 2 Capital	-
58	**Tier 2 Capital**	**-**
59	**Total Capital (Total Capital = Tier 1 + Tier 2)**	**74 057 036,17**
60	**Total risk weighted assets**	**119 257 316,67**
Capital ratios and buffers		
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	23,30%
62	Tier 1 Capital (as a percentage of total risk exposure amount)	23,30%
63	Total capital (as a percentage of total risk exposure amount)	23,30%

64	Institution-specific buffer requirement (Common Equity Tier 1 requirement in accordance with Article 92.1.a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus systemically important institution buffer expressed as a percentage of risk exposure amount	-
65	of which: capital conservation buffer requirement	-
66	of which: countercyclical buffer requirement	-
67	of which: systemic risk buffer requirement	-
67a	of which: Global Systemically Important Institution or Other Systemically Important Institution buffer	-
68	Common Equity Tier 1 available to meet buffers (as a percentage of total risk exposure amount)	-
69 71	Non relevant in EU regulation	-
Amounts below the thresholds for deduction (before risk weighting)		
72	Direct and indirect holdings of the capital 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)	-
73	Direct and indirect holdings by the institution of the Common Equity Tier 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	-
74	Empty set in the EU	-
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38.3 are met)	-
Applicable caps on the inclusion of provisions in Tier 2		
76	Credit risk adjustments included in Tier 2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-
77	Cap on inclusion of credit risk adjustments in Tier 2 under standardised approach	-
78	Credit risk adjustments included in Tier 2 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 Tier 2 under internal ratings-based approach	-
Capital instruments subject to phase-out arrangements (only applicable between January 1st 2014 and January 1st 2022)		
80	- Current cap on Common Equity Tier 1 instruments subject to phase out arrangements	-
81	- Amount excluded from Common Equity Tier 1 due to cap (excess over cap after redemptions and maturities)	-
82	- Current cap on Additional Tier 1 instruments subject to phase out arrangements	-
83	- Amount excluded from Additional Tier 1 due to cap (excess over cap after redemptions and maturities)	-
84	- Current cap on Tier 2 instruments subject to phase out arrangements	-
85	- Amount excluded from Tier 2 due to cap (excess over cap after redemptions and maturities)	-

The IPOPEMA Group holds neither capital instruments qualifying under Additional Tier 1 nor capital instruments or loans qualifying under Tier 2.

Description of the main features of Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments issued by the institution. Full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments

Main features of Tier 1 instruments

No.	Series/issue	A	B	C	C	C	C	C
1.	Issuer	IPOPEMA	IPOPEMA	IPOPEMA	IPOPEMA	IPOPEMA	IPOPEMA	IPOPEMA

2.	Unique identifier	PLIPOPM00011	PLIPOPM00011	PLIPOPM00011	PLIPOPM00011	PLIPOPM00011	PLIPOPM00011	PLIPOPM00011
3.	Governing law(s) of the instrument	Polish law	Polish law	Polish law	Polish law	Polish law	Polish law	Polish law
	Regulatory treatment							
4.	Transitional CRR rules	Common	Common	Common	Common	Common	Common	Common
		Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1
5.	Post-transitional CRR rules	Common	Common	Common	Common	Common	Common	Common
		Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1	Equity Tier 1
6.	Eligible at solo or (sub-)consolidated/ solo and (sub-)consolidated	Solo	Solo	Solo	Solo	Solo	Solo	Solo
7.	Instrument type	Ordinary bearer shares	Ordinary bearer shares	Ordinary bearer shares	Ordinary bearer shares	Ordinary bearer shares	Ordinary bearer shares	Ordinary bearer shares
8.	Amount recognised in regulatory capital, as at 31 December 2017	PLN 700,000	PLN 9,305,019	PLN 167,857	PLN 194,462	PLN 1,062,500	PLN 986,605	PLN 928,570
9.	Nominal amount of instrument	PLN 0.10	PLN 0.10	PLN 0.10	PLN 0.10	PLN 0.10	PLN 0.10	PLN 0.10
9a.	Issue price	PLN 0.10	PLN 4.31	PLN 0.47	PLN 0.47	PLN 5.00	PLN 5.00	PLN 5.00
9b.	Redemption price	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10.	Accounting classification	Equity	Equity	Equity	Equity	Equity	Equity	Equity
11.	Original date of issuance	2005	2006	2009	2010	2011	2012	2013
12.	Perpetual or dated	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual
13.	Original maturity date	None	None	None	None	None	None	None
14.	Issuer call subject to prior supervisory approval	No	No	No	No	No	No	No
15.	Optional call date, contingent call dates and redemption amount	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
16.	Subsequent call dates, if applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
	Coupons / dividends							
17.	Fixed or floating dividend/coupon	Floating rate	Floating rate	Floating rate	Floating rate	Floating rate	Floating rate	Floating rate
18.	Coupon rate and any related index	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
19.	Existence of a dividend stopper	No	No	No	No	No	No	No
20a.	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary
20b.	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary

21.	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No
22.	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23.	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24.	If convertible, conversion trigger(s)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
25.	If convertible, fully or partially	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
26.	If convertible, conversion rate	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
27.	If convertible, mandatory or optional conversion	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
28.	If convertible, specify instrument type convertible into	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
29.	If convertible, specify issuer of instrument it converts into	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
30.	Write-down features	No	No	No	No	No	No	No
31.	If write-down, write-down trigger(s)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
32.	If write-down, full or partial.	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
33.	If write-down, permanent or temporary	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
34.	If temporary write-down, description write-down mechanism	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
35.	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
36.	Non-compliant transitioned features	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
37	If yes, specify non-compliant features	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

A description of all restrictions applied to the calculation of own funds in accordance with the CRR and the instruments, prudential filters and deductions to which those restrictions apply

IPOPEMA does not apply any restrictions to the calculation of own funds in accordance with the CRR nor any instruments, prudential filters or deductions to which such restrictions apply.

Explanation of the basis on which capital ratios are calculated using elements of own funds determined on a basis other than that laid down in the CRR

IPOPEMA does not use capital ratios calculated using elements of own funds determined on a basis other than that laid down in the CRR.

4. Capital requirements

A summary of IPOPEMA's approach to assessing the adequacy of its internal capital to support current and future activities

IPOPEMA Securities has implemented an internal capital adequacy assessment system, described in detail in the document entitled 'Internal Capital Adequacy Assessment Process'.

Internal capital is defined as an amount estimated by a brokerage house as necessary to cover all the identified material risks inherent in its operations and changes in the economic environment, taking into account the forecast risk levels.

Risk materiality assessment consists in an analysis of risks prevalent in IPOPEMA Securities' operations and its environment, and is designed to identify risks relevant to its business, which will be further analysed during subsequent stages of the ICAAP. The Brokerage House has introduced processes intended to manage risks assessed as material and accumulated internal capital to cover those risks.

In calculating internal capital, IPOPEMA Securities S.A. applies a solution based on Pillar 1's own funds regulatory requirement (capital ratio of 8%), which is a starting point for assessing additional capital which may be required to support risks not covered or not fully covered by Pillar 1's minimum own funds regulatory requirement and applying an adequate charge to reflect that additional capital requirement.

The table below presents the risks analysed by IPOPEMA, the materiality criteria and approach adopted to assess specific risks:

Risk	Materiality	Calculation of internal capital
Credit risk	Always material	Risk exposure x 8%
Operational risk	Always material	Risk exposure x 8%
Settlement/delivery risk	Keeping exposures within Total risk exposure	Risk exposure x 8%
Currency risk	Keeping exposures within Total risk exposure	Risk exposure x 8%
Commodity risk	Keeping exposures within Total risk exposure	Risk exposure x 8%
Position risk	Keeping exposures within Total risk exposure	Risk exposure x 8%
Credit Valuation Adjustment risk	Keeping exposures within Total risk exposure	Risk exposure x 8%
Risk related to large exposures in the trading book	Keeping exposures within Total risk exposure	Risk exposure x 8%
Liquidity risk	Always material	-
Business risk	Expert opinion	Internal model developed by the Company
Reputation risk	Expert opinion	

The internal capital adequacy assessment process is reviewed on a regular basis and modified if necessary. The review exercise consists of:

- reviewing risks inherent in IPOPEMA's operations,
- reviewing the approaches to assessment of materiality of specific risks, and
- reviewing the approaches to measurement of material risks.

The internal capital adequacy assessment process is reviewed at least on an annual basis. A review is also performed whenever a new type of risk is identified, a material revision is made to the strategy or an action plan, changes occur in IPOPEMA's external environment or there are other factors with a bearing on the proper operation of the assessment process.

Methods used to calculate exposures to specific types of risks, with references to relevant provisions of the CRR

Tag	Calculation method	Reference to CRR
Risk-weighted exposure value for credit risk, counterparty credit risk, dilution risk and free delivery risk	Standardised Approach	Part Three, Title II, Chapter 2
Risk exposure value arising from own contributions to the default fund of a CCP	Art. 308	Part Three, Title II, Chapter 6
Total equity instruments risk exposure value	Art. 341-344	Part Three, Title IV, Chapter 2, Section 3
Total currency risk exposure value	Articles 351−352 of CRR	Part Three, Title IV, Chapter 3
Total operational risk exposure value	Basic Indicator Approach	Part Three, Title III, Articles 315−316 of CRR
Total exposure on credit valuation adjustment (CVA) risk	Standardised Approach	Part Three, Title VI, Art. 384
Total exposure on risk arising from large exposures in the trading book	Art. 397	Part Four

Disclosures concerning 8% of risk-weighted exposures for exposure classes specified in Article 112 of CRR

Exposure class	8% of risk-weighted exposure in PLN
Exposures to central governments or central banks	-
Exposures to regional governments or local authorities	-
Exposures to public sector entities	-
Exposures to multilateral development banks	-
Exposures to international organisations	-
Exposures to institutions	4 693 185,41
Exposures to corporates	2 677 061,49
Retail exposures	1 542,63
Exposures secured by mortgages on immovable property	-
Exposures in default	196 602,94
Exposures associated with particularly high risk	309 198,50
Exposures in the form of covered bonds	-
Items representing securitisation positions	-
Exposures to institutions and corporates with a short-term credit assessment	-
Exposures in the form of units or shares in collective investment undertakings	690 949,35
Equity exposures	240 723,55
Other exposures	731 321,47
Risk exposure value arising from own contributions to the default fund of a CCP	**2 433,09**
Total	**9 543 018,43**

Total exposure amounts for credit risk, counterparty credit risk, dilution risk and free deliveries, settlement/delivery risk, position risk, currency risk, operational risk, and risk related to large exposures in the trading book

TOTAL CONSOLIDATED RISK EXPOSURE (value)		317 815 616,28
1.	Risk-weighted exposure value for credit risk, counterparty credit risk, dilution risk and free deliveries	119 287 730,30
2.	Total exposure value for position risk, currency risk and commodities risk	34 239 135,99
2.1. Settlement/delivery risk		-
2.2. Total exposure value for position risk, currency risk and commodities risk		34 239 135,99
2.2.1. Traded debt instruments		-
2.2.2. Shares		6 017 112,74
2.2.3. Currencies		28 222 023,25
2.2.4. Commodities		-
3.	Total operational risk exposure value	164 288 750,00
4.	Total exposure value for risk related to large exposures in the trading book	-,

5. Counterparty credit risk exposure

Counterparty credit risk means the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. Counterparty credit risk exposure includes exposures arising from derivative instruments, repurchase transactions, securities or commodities lending or borrowing transactions, long settlement transactions and margin lending transactions.

The only counterparty credit risk exposures held by IPOPEMA in 2017 were exposures arising from transactions in futures contracts executed for clients and cleared through the CCP.

In calculating exposure values for credit risk, counterparty credit risk, dilution risk and free deliveries, the Company applies a risk weight of 2% to exposures arising from client transactions in QCCP-cleared futures, according to Art. 306 of the CRR Directive. Own funds requirements for pre-funded contributions to the default fund of a QCCP are calculated based on the method set out in Art. 308 of the CRR Directive. Other exposures to QCCP are treated as exposures to institutions (Art. 102 Item 2. of the CRR Directive).

It is important to note that considering the nature of exposures held by the Company (IPOPEMA Securities holds exposures to client transactions in futures contracts executed solely on the stock market), these exposures are monitored on an ongoing, daily basis.

6. Capital buffers

As at December 31st 2017, IPOPEMA was not obliged to disclose information on its compliance with the requirement for a countercyclical capital buffer, referred to in Title VII Chapter 4 of Directive 2013/36/EU.

7. Indicators of global systemic importance

As at December 31st 2017, IPOPEMA was not obliged to disclose information under Article 131 of Directive 2013/36/EU.

8. Credit risk adjustments

8.1 Definition of past due and impaired receivables

Receivables are initially recognised at nominal value and measured as at the end of the reporting period at amounts receivable. Receivables are remeasured based on the probability of their payment, with impairment losses recognised where necessary. Impairment losses are recognised if there is objective evidence that recovery of all amounts due in line with the original contractual terms will not be possible.

Impairment losses are recognised in particular for:

- receivables past due by 6 months to 1 year – impairment loss of 50% of the receivables amount is recognised,
- receivables past due by more than 1 year – impairment loss of 100% of the receivables amount is recognised.

Apart from the above general rule, the Group may also recognise impairment losses on an individual basis, when it believes that the recovery of the full amount of receivables is subject to significant risk.

Past due receivables are receivables not paid by the due date. According to Art. 178 Item 1b of the CRR Directive, for the purposes of prudential requirements, IPOPEMA Securities defines past due receivables as unsecured exposures overdue by more than 90 days.

Impairment takes place when it is highly probable that an asset controlled by the entity will fail to deliver, in whole or in significant part, the expected future economic benefits.

8.2 Total amount of exposures excluding the effect of credit risk mitigation, and average amount of exposures over the period by class

Exposure class	Dec 31 2017	2017 average
Exposures to central governments or central banks	980 525,00	980 525,00
Exposures to institutions	276 659 541,34	276 659 541,34
Exposures to corporates	33 463 268,66	33 463 268,66
Retail exposures	25 710,57	25 710,57
Past due exposures	1 638 357,82	1 638 357,82
High risk exposures	1 545 992,48	1 545 992,48
Exposures under units in collective investment undertakings	8 636 866,82	8 636 866,82
Equity exposures	3 009 044,32	3 009 044,32
Other exposures	9 142 390,83	9 142 390,83
Total	**335 101 697,84**	**335 101 697,84**

8.3 Geographical distribution of exposures, including impaired and past due exposures

Exposure class	Country	Initial exposure	Adjustment for general credit risk	Adjustment for specific credit risk	Impairment losses on receivables	Value
Exposures to central governments or central banks	Poland	980 525	-	-	-	980 525
Exposures to institutions	Czech Republic	1 043 856	-	-	-	1 043 856
	Germany	426 256	-	-	-	426 256
	Poland	183 034 633	-	-	-	183 034 633
	Romania	34 666	-	-	-	34 666
	US	3 837 336	-	-	-	3 837 336
	Hungary	11 979 629	-	-	-	11 979 629
	UK	76 303 166	-	-	-	76 303 166
	Poland	33 130 643	-	-	-	33 130 643

Exposures to corporates	Luxembourg	36 350	-	-	-	36 350
	UK	296 276	-	-	-	296 276
Retail exposures	Poland	25 711	-	-	-	25 711
Exposures associated with particularly high risk	Poland	1 545 992	-	-	-	1 545 992
Exposures in default	Poland	3 587 853	-	-	1 962 109	1 625 744
	Norway	4 746	-	-	4 746	-
	US	13 704	-	-	6 090	7 613
	UK	99 179	-	-	94 179	5 000
Exposures associated with collective investment undertakings	Poland	8 636 867	-	-	-	8 636 867
Equity exposures	Poland	3 009 044	-	-	-	3 009 044
Other exposures	Poland	7 943 029	-	-	-	7 943 029
	Hungary	24 041	-	-	-	24 041
	Romania	43 720	-	-	-	43 720
	US	140 482	-	-	-	140 482
	UK	2 103	-	-	-	2 103
	Germany	396 334	-	-	-	396 334
	Canada	22 387	-	-	-	22 387
	France	6 151	-	-	-	6 151
	Spain	76 230	-	-	-	76 230
	Luxembourg	37 914	-	-	-	37 914
	Netherlands	450 000	-	-	-	450 000
Total		**337 168 822**	-	-	**2 067 124**	**335 101 698**

8.4 Distribution of exposures by industry or type of counterparty, including impaired and past due exposures

Exposure class	Counterparty type	Initial exposure	Impairment losses	Impairment losses on receivables	Net exposure
Exposures to central governments or central banks	Central and local government institutions	980 525	-	-	980 525
Exposures to public sector entities	Central and local government institutions	-	-	-	-
Exposures to institutions	Banks	99 886 093	-	-	99 886 093
	Other financial institutions, including:	176 773 448	-	-	176 773 448
	SMEs	-	-	-	-
Exposures to corporates	Other financial institutions, including:	29 896 082	-	-	29 896 082
	SMEs	-	-	-	-
	Non-financials, including:	3 567 187		-	3 567 187
	SMEs	-	-	-	-
Retail exposures	Households	25 711	-	-	25 711
Exposures in default	Banks and other financial institutions	294 070	-	207 769	86 300
	Non-financials, including:	3 411 412	-	1 859 354	1 552 057
	SMEs	-	-	-	-
Positions associated with particularly high risk	Central and local government institutions	1 545 992	-	-	1 545 992
Exposures associated with collective investment undertakings	Other financial institutions, including:	8 636 867	-	-	8 636 867
	SMEs	-	-	-	-
Equity exposures	Banks and other financial institutions	-	-	-	-
	Non-financials	3 009 044	-	-	3 009 044
Other exposures	Other assets	9 142 391	-	-	9 142 391
Total		**337 168 822**	**-**	**2 067 124**	**335 101 698**

8.5 Residual maturities for all own funds exposures to credit risk, by exposure class

Class	Up to 1 month	Over 1 month to 3 months	Over 3 months to 12 months	Over 12 months	Indefinite	Total
Exposures to central governments or central banks	980 525	-	-	-	-	**980 525**
Exposures to public sector entities	-	-	-	-	-	-
Exposures to institutions	240 599 609	24 390 873	11 659 060	10 000	-	**276 659 542**
Exposures to corporates	33 463 269	-	-	-	-	**33 463 269**
Retail exposures	25 711	-	-	-	-	**25 711**
Exposures in default	-	-	-	-	1 638 358	**1 638 358**
Positions associated with particularly high risk	-	-	-	-	1 545 992	**1 545 992**
Exposures associated with collective investment undertakings	-	-	-	-	8 636 867	**8 636 867**
Equity exposures	-	-	-	-	3 009 044	**3 009 044**
Other items	4 261 714	474 548	800 622	348 865	3 256 641	**9 142 390**
Total	**279 330 828**	**24 865 421**	**12 459 682**	**358 865**	**18 086 902**	**335 101 698**

8.6 Reconciliation of changes in impairment losses

Changes in impairment losses on receivables	2017
Impairment losses on current receivables at beginning of period	880 262
a) increase	1 666 890
b) decrease	480 028
Impairment losses on current receivables at end of period	**2 067 124**

9. Unencumbered assets

As at December 31st 2017, the carrying amount of unencumbered assets was PLN 276 484 057,30, while the carrying amount of encumbered assets stood at PLN 68 855 982,00.

The encumbered assets include primarily cash paid to central counterparties and other clearing institutions for transaction clearing guarantee funds and security deposits for transactions in securities – their value as at December 31st 2017 amounted to PLN 51 684 889,81. Additionally, in connection with the Group companies' operations, the Group placed security deposits with third parties in a total amount of PLN 17 171 092,19.

10. Use of ECAIs

IPOPEMA does not rely on any external credit assessments when calculating risk-weighted exposure amounts for credit risk.

11. Market risk exposure

IPOPEMA calculated the own funds requirements for equity instruments risk in accordance with Part Three, Title IV, Chapter 3, Section 3 of the CRR – Own funds requirements for equity instruments risk. As at December 31st 2017, the consolidated exposure value for capital instruments risk was PLN 3 008 556,37.

IPOPEMA did calculate the own funds requirements for currency risk in accordance with Part Three of Title IV Chapter 3 of the CRR − Own funds requirements for currency risk. As at December 31st 2014, the consolidated exposure value for currency risk was PLN 28 222 023,25.

12. Operational risk

IPOPEMA uses the Basic Indicator Approach to calculate own funds requirements for operational risk, in accordance with Title III Chapter 2 of the CRR.

The total consolidated exposure value for operational risk as at December 31st 2017 stood at PLN 164 288 750,00.

13. Exposures in equities not included in the trading book

Exposure types and valuation methodologies

As at December 31st 2017, the IPOPEMA Group held non-trading book equities (shares in prudentially non-consolidated subsidiaries) with a value of PLN 3 009,04 thousand.

Shares in prudentially non-consolidated subsidiaries are measured at cost less impairment losses. In 2017, there were no impairment losses on financial instruments available for sale.

Carrying amount and fair value of non-trading book equities (PLN '000)

Equity instrument	carrying amount as at Dec 31 2017	fair value as at Dec 31 2017
shares and other equity interests	3 009,04	3 009,04

Equities held in the Group's non-trading book are not traded on a regulated market.

2017 gains/losses on non-trading book equities (PLN '000)

Equity instrument	Realised gains/losses on sale	Total unrealised gains/losses
shares and other equity interests	-	-

14. Exposure to interest rate risk on positions not included in the trading book

IPOPEMA Securities defines interest rate risk in the non-trading book as a risk from exposure of the Company's current and future financial result and capital to an adverse impact of interest rate changes for positions in the non-trading book.

As IPOPEMA Securities' operations do not include deposit taking and lending activities within the meaning of the Polish Banking Law, the Company does not identify the interest rate risk in the non-trading book as a material risk and does not manage that risk.

15. Exposure to securitisation positions

In 2017, IPOPEMA had no securitisation exposure.

16. Remuneration policy

The Company's Remuneration policy for employees with material impact on the risk profile (hereinafter the "Policy"), which was implemented in 2017 in connection with the entry into force of the new regulations regarding the principles of remuneration in brokerage houses, defined in the amended Act on Trading in Financial Instruments and the Regulation of the Minister of Development and Finance of April 27th 2017 on internal capital, risk management system, supervisory assessment program and supervisory assessment score, as well as remuneration policy in a brokerage houses..

The abovementioned Policy replaced the previous remuneration policy based on the Minister of Finance's Regulation on the rules for establishment of a variable remuneration component policy for persons holding management positions at brokerage houses, dated December 2nd 2011.

The Policy has been established in order to:

- ensure proper and effective risk management and prevent risk taking in excess of the risk appetite approved by the Supervisory Board,
- support implementation of strategic goals of the Brokerage House,
- prevent conflicts of interest.

Disclosures in this document relate to the categories of employees whose professional activities have a material impact on the risk profile of the Company, which were classified on the basis of Commission Delegated Regulation (EU) No 604/2014 of 4 March 2014 supplementing the Directive of the European Parliament and the Council 2013 / 36 / EU 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 (Official Journal of the European Union L 167 of 06/06/2014, page 30, with later changes)

16.1. Information on the decision-making process used for determining the remuneration policy, as well as the number of meetings held by the main body overseeing remuneration during the financial year

The Management Board of the Company is responsible for developing, implementing and updating the Policy, but it is subject to approval by the Supervisory Board.

The implementation of the Policy is assessed at least once a year as part of the internal audit. The report from this assessment is presented to the Supervisory Board, which does periodic reviews of the Policy and supervises its implementation at least once a year.

The list of positions covering the categories of persons covered by the Policy is approved by the Management Board and is subject to verification as necessary, but at least once a year, in particular before the employee is granted variable remuneration.

The governing body supervising the remuneration is the Management Board of the Company, and in relation to the Management Board - the Supervisory Board (entrusted with the tasks of the remuneration committee). In 2017, it held seven meetings, part of which were devoted to matters relating to remuneration. Furthermore, decisions regarding this area were also made in circulation.

16.2 Information on linkages between pay and performance, and criteria on which the entitlement to shares, options or variable components of remuneration is based

Variable remuneration is discretionary and its linkage with performance is not subject to any parameters. For more information on determination and payment of variable remuneration, see section 16.3 below.

16.3 Key design characteristics of the remuneration system, including the main parameters and rationale for any variable component scheme and any other non-cash benefits

The remuneration of persons covered by the Policy comprises both fixed and variable components.

Variable components of remuneration may be granted only on the principles set out in the Policy. It is not permissible to give employees covered by the Policy variable remuneration components (including monetary prizes referred to in Article 105 of the Labor Code, bonuses, bonuses, incentive systems, etc.) on principles inconsistent with the Policy.

Under the Policy adopted by the Brokerage House, the variable components can take one of the two forms:

- remuneration linked to the Brokerage House's performance provided for in the contract with an employee (performance bonus system),
- discretionary remuneration in the form of a cash reward (discretionary bonus).

Under the Policy, if the performance-linked remuneration system is put in place, particularly in the form of an incentive scheme or a performance bonus system written into the contract with an employee:

- the aggregate amount of the employee's remuneration is determined based on the employee's individual performance and the performance of the employee's business unit relative to the Company's overall performance; the individual performance being evaluated against both financial and non-financial criteria,
- performance is evaluated based on the data for at least three last financial years, or in the case of employees who have been in service for less than three years − based on the data for such shorter period.

The variable remuneration consists of a cash component and a non-cash component in the form of financial instruments accounting for at least 50% of the variable remuneration. Payment of the non-cash component is contingent upon non-occurrence of events specified in the Policy, which could threaten the proper operation of the Brokerage House, as well as upon non-occurrence of certain other events specified individually for each person covered by the Policy.

At least 40% of the variable components of remuneration (60% if the total employee remuneration in the previous financial year exceeded the equivalent of EUR 1 million) is accounted for and paid over a period of three to five years, this period being determined taking into account the nature and the risk activities and responsibilities of the employee.

Unless the Management Board (and in relation to the Management Board - the Supervisory Board) decides otherwise, in relation to persons receiving variable remuneration components in the amount not higher than 50% of fixed remuneration components, the above mentioned requirements for disbursements in financial instruments and their deferment do not apply.

16.4 Ratio between the fixed and the variable remuneration components, determined in accordance with Article 94.1.g of Directive 36/2013

Fixed remuneration components represent a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to lower or pay no variable remuneration component. The above principle applies when determining the remuneration amounts at the Company; however, no detailed parameters for the ratio between the fixed and the variable remuneration have been defined.

The ratio of variable remuneration components to fixed remuneration components may not exceed 100% for each person. The Company may apply a higher maximum ratio of variable components of remuneration to fixed components of remuneration, however, not higher than 200%, which is strengthened by the consent of the General Meeting.

16.5 Aggregate quantitative information on remuneration broken down by business area

Given the nature of the Company's organisation, that is its organisational structure and process by which key decisions are made, the Management Board Members are considered persons who have a real and material impact on the Company's risk profile. For information on the Management Board's remuneration, see section 16.6 below.

16.6 Aggregate quantitative information on remuneration broken down into the senior management and members of staff whose actions have a material impact on the institution's risk profile

Remuneration amounts for 2017 split into fixed and variable remuneration, and the number of beneficiaries

(PLN '000)

Management positions	Total remuneration	Fixed components	Variable components	Number of beneficiaries
Members of the Management Board	1 899	1 428	471	5/4*
Other	1 745	1 629	116	11

**) In January 2017 the Management Board consisted of 5 persons and 4 persons since*

Amounts and forms of variable remuneration, split into cash, shares, share-linked instruments and other types

(PLN '000)

Management positions	Variable components	Cash	Financial instruments
Members of the Management Board	471	-	471
Other	116	38	78

Amounts of outstanding deferred remuneration, split into vested and unvested portions

(PLN '000)

Management positions	Deferred remuneration	Vested	Unvested
Members of the Management Board	844	234	610
Other	53	37	16

Amounts of deferred remuneration awarded during the financial year, paid out and reduced through performance adjustments

(PLN '000)

Management positions	Variable components	Paid	Payable	Reduced
Members of the Management Board	471	0	471	-
Other	116	44	72	-

New sign-on and severance payments made during the financial year, and the number of beneficiaries of such payments

In 2017, the severance payments amounted to PLN 82 thousand.

i) number of individuals being remunerated EUR 1 million or more in the financial year

In the 2017 financial year, no individuals were remunerated EUR 1 million or more.

17. Leverage

Leverage ratio

Exposure value	
SFT: Exposures according to CRR 429 (5) and (8)	-
SFT: Add-on amount for counterparty credit risk	-
SFT deviation: Amount to be added due to CRR 429 (4) and CRR 222	-
Counterparty credit risk related to SFT concluded via intermediaries according to CRR 429 (6b)	-
Derivatives: Market value	-
Derivatives: Add-on Mark-to-Market Method	-
Derivatives: Original Exposure Method	-
Deviation for financial instruments: primary exposure valuation method	-
Nominal value of issued credit derivatives after exclusions and deductions	-
Off-balance items with conversion ratio of 10% according to CRR 429 (10)	-
Off-balance items with conversion ratio of 20% according to CRR 429 (10)	-
Off-balance items with conversion ratio of 50% according to CRR 429 (10)	-
Off-balance items with conversion ratio of 100% according to CRR 429 (10)	-
Other off-balance sheet items	-
Other assets	335 101 698
(-) Deducted amount of assets - Tier 1 capital - fully phased-in definition	- 2 588 187
(-) Deducted amount of assets - Tier 1 capital - transitional definition	- 2 588 187
Total leverage ratio exposures – Tier 1 capital - fully phased-in definition	332 513 511
Total leverage ratio exposures – Tier 1 capital - transitional definition	332 513 511

Capital	
Tier 1 capital - fully phased-in definition	74 057 036
Tier 1 capital - transitional definition	74 057 036
Leverage Ratio	
Leverage Ratio - using a fully phased-in definition of Tier 1	22,27%
Leverage Ratio - using a transitional definition of Tier 1	22,27%

Leverage risk management

IPOPEMA defines leverage risk as the risk resulting from an institution's vulnerability due to leverage that may require unintended corrective measures to its business plan, including distressed selling of assets, which might result in losses or in valuation adjustments to its remaining assets.

IPOPEMA calculates its leverage ratio using the methodology set out in Article 429 of Part Seven of the CRR, that is by dividing Tier 1 capital measure by total exposure measure.

Until a minimum leverage ratio is set under the CRR, IPOPEMA has adopted an internal minimum leverage ratio of 3%.

Information concerning the Company's leverage ratio is sent to the Polish Financial Supervision Authority every quarter.

18. Use of IRB approach to credit risk

In 2017, IPOPEMA did not use the internal ratings based approach to calculate its credit risk-weighted exposures.

19. Use of credit risk mitigation techniques

In 2017, IPOPEMA did not use credit risk mitigation techniques.

20. Use of the advanced measurement approaches to operational risk

In 2017, IPOPEMA did not use advanced measurement approaches with respect to its operational risk.

21. Use of internal market risk models

In 2017, IPOPEMA did not use internal market risk models.

Appendix 1

Declaration by the Management Board of IPOPEMA Securities S.A.

Pursuant to Article 435.1e of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of June 26th 2013 on prudential requirements for credit institutions and investment firms (OJ 2013.176.1),

the Management Board of IPOPEMA Securities S.A. declares that the risk management system in place at the Company is adequate with regard to its business profile and strategy.

Management Board of IPOPEMA Securities S.A.

Appendix 2

Statement by the Management Board of IPOPEMA Securities S.A. on IPOPEMA Securities S.A.'s overall risk profile associated with its business strategy

Pursuant to Article 435.1f of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of June 26th 2013 on prudential requirements for credit institutions and investment firms (OJ 2013.176.1), the Management Board of IPOPEMA Securities S.A. states the following:

Risk sources and threats

The capital ratios and the own funds to internal capital ratio met IPOPEMA's risk appetite standards:

- Consolidated internal capital averaged PLN 38 763 542,95 and stood at PLN 40 447 530,30 as at December 31st 2017,
- Capital ratio averaged 22.33% and stood at 23.30% as at December 31st 2017,
- Consolidated own funds averaged PLN 74 854 579,11 and stood at PLN 74 057 036,17 as at December 31st 2017,
- Total consolidated risk exposure averaged PLN 336 459 536,89 and stood at PLN 317 815 616,28 as at December 31st 2017.

Operational risk

In 2017, no material operational incidents took place at IPOPEMA Securities S.A. which would result in unexpected losses for the Company due to insufficient or deficient internal processes, systems, human error or external incidents.

Credit risk

The risk management system in place at IPOPEMA Securities provides for daily reviews of the Company's credit risk profile, being the value of its credit risk-weighted exposures, broken down by asset classes. Credit risk movements shown against the Company's other key capital adequacy measures are reported to the Management and Supervisory Boards as the Company's governing bodies.

Consolidated risk-weighted assets stood at PLN 119 257 316,67 as at December 31st 2017.

Market risk

IPOPEMA Securities engages in proprietary trading in financial instruments in compliance with its internal regulations, including those defining relevant exposure limits.

Positions in financial instruments are monitored for compliance with the pre-set limits on an ongoing, daily basis.

In 2017 the utilisation of the exposure limit was around 20-60%. In 2017 no cases of exceeding of the overall exposure limit within the trading book were recorded.

Liquidity risk

No incidents occurred in 2017 which could pose a threat to IPOPEMA Securities' liquidity. With the efficiency of own funds in mind and driven by the need to diversify the available financing sources, the Company uses lines of credit to fund its brokerage activities, in order to be able to settle its current liabilities to the clearing institution which arise from stock-exchange transactions. As at December 31st 2017, the Company had revolving overdraft facility agreements signed with (i) Alior Bank S.A. for a total amount of PLN 40m and (ii) Raiffeisen Bank Hungary for a total amount of HUF 409m.

Reputation risk

No significant amount of media coverage (articles/programmes) was observed by IPOPEMA in 2017 which could have a negative impact on how the Company is perceived by its clients and partners.

As of December 31st 2017, the IPOPEMA Group's internal capital covering reputation risk was PLN 1 836 149.

Business risk

In 2017, the IPOPEMA Group's internal capital covering business risk was PLN 13 186 132.

Material changes to the risk management system

In result of the 2017 review of its internal risk management process, IPOPEMA updated its risk management procedures, which included:

- review of the methodology of conducting the stress test in terms of their greater versatility and flexibility (currency risk) and the severity of the test (simultaneous materialization of several risk factors),
- introduction of a stress test on the consolidated level,
- changes in the methodology for calculating consolidated capital adequacy standards - the transition from the calculation of capital adequacy standards based on accounting consolidation to the calculation of capital adequacy standards based on prudential consolidation,
- verification and supplementing of the Emergency Capital and Liquidity Plans with the specification of the moment of their launch in terms of the mechanisms adopted in the Group recovery plan,
- introduction of risk management mechanisms at the consolidated level - clarification of the scope of responsibility of individual units in the scope of risk management and reporting at the consolidated level.

Summary

The risk management system in place at IPOPEMA allows the Management Board to take risks in a controlled way to deliver on its business plans and objectives, including performance targets. This goal is pursued at the Company by identifying, measuring, monitoring and controlling the specific types of current and future risks that affect or could affect IPOPEMA's operations.

Management Board of IPOPEMA Securities S.A.