



# ESG STRATEGY OF XTB S.A. CAPITAL GROUP

2024-2027

Warsaw, July 23, 2024

# Discover XTB



it is a synonym of **innovation, passion and continuous development**. As a Polish FinTech with a global reach, we provide our Investors with instant access to financial markets from around the world through our proprietary online investment platform and the XTB mobile application.

We support **over a million Clients** worldwide in achieving their investment ambitions. Over more than **20 years of operation** in financial markets, we have expanded our team to **over a thousand Employees and Associates**. Our Capital Group is constantly growing. XTB's headquarters is located in Poland, and we have offices in many countries around the world, i.a. the United Kingdom, Germany, Romania, Spain, the Czech Republic, Slovakia, Portugal, France, the United Arab Emirates, Chile, Cyprus, and Indonesia.

**Respect, responsibility and dialogue** in our relationships with Stakeholders are key factors for our global development. We promote the idea of conscious investing through our activities in the field of financial education, giving everyone the opportunity to build investment knowledge.



# Mission & Vision of XTB

**Our mission** is to provide Clients worldwide with access to an advanced investment platform, professional service, and comprehensive financial education. We strive for sustainable development and excellence in service delivery, building trust and long-lasting relationships with our Clients to help them achieve success in financial markets.



**Our vision** is to be the leading provider of investment products, renowned for innovation, transparency, and excellent customer service. We aim to be perceived as a trusted partner, enabling our Clients to achieve their financial goals by providing an All-in-One platform, the knowledge, and the support needed for effective investing, with respect for sustainable development.

*"A responsible and modern business cannot operate without incorporating ESG criteria into its activities. Therefore, in 2021, we implemented the first ESG Strategy of the XTB Group, which we updated in 2024. This period was exceptional for our organization, allowing us to streamline processes, verify key areas of sustainable development at XTB, strengthen our organizational culture and team. Thank you for being with us. We hope you will accompany us in the further stages of our journey towards sustainable development. We will not cease in our efforts, working every day to earn your trust."*

**Omar Arnaout**  
CEO of XTB





# About the ESG Strategy

We make every effort to ensure that our actions strengthen XTB's organizational culture around social responsibility, which includes environmental and climate protection and conscious resource management.

Our actions are characterized by consistency and transparency through creating real change in XTB's business activities and continuing previously initiated strategic directions. We responsibly integrate business and sustainable development activities, contributing simultaneously to the economic growth of the XTB Group and building value for our Shareholders.

We operate based on the best available market practices, including, i.a., *the OECD Guidelines for Multinational Enterprises*, *the UN Guiding Principles on Business and Human Rights*, and *the Ten Principles of the UN Global Compact initiative*.

Aware of the ongoing climate changes and maturing social needs, we strive to improve processes in line with ESG criteria. For this reason, we decided to update the [ESG Strategy of the XTB Group](#), which reflects our sense of responsibility, our commitment to the sustainable development of the organization and serves as a tool for managing ESG aspects. The designated time horizon is intended to support us in striving for and achieving the next milestones in our development.

The document was prepared by a specialized organizational unit within the structure of XTB S.A. initiating ESG activities in cooperation with representatives from key areas of XTB. The ESG Strategy was based, i.a., on the Double Materiality Assessment, conducted in the first half of 2024 and was ultimately adopted by the Management Board of XTB S.A.



# Our values



Since the beginning of our business activity, we have been guided by values such as:



## SUPPORT

We support our Clients with the advanced xStation investment platform, disseminating the knowledge necessary for effective investing and offering the support of XTB experts. We endorse our Employees by providing access to organized initiatives and trainings, attractive benefits, and the ability to adjust their work mode and hours to individual needs. We support our Shareholders through responsible management and a well-thought-out dividend policy.



## TECHNOLOGY

With full awareness, we identify technology as one of the most crucial elements of investing through XTB. We strive for continuous improvement of our skills, knowledge, and investment offerings. We invest in the competencies of our Employees to provide them with opportunities for professional and personal development. We grow through the diversity and professionalism of our team, building a strong organizational culture. We aim to create a modern investment environment.



## TRUST

We build valuable relationships based on trust with our Stakeholders through responsible actions, transparent communication and openness to dialogue. We develop an organizational culture based on mutual respect, cooperation and partnership. Our operations are regulated by the world's largest supervisory authorities. We continuously improve our competencies and enhance the quality of our services, ensuring a sense of stability for our Stakeholders.



# Three pillars of ESG Strategy at XTB Group

## ENVIRONMENT

- ✓ we care about the natural environment at work; we introduce solutions aimed at more efficient management of natural resources;
- ✓ we develop responsible management of electronic waste;
- ✓ we strive for full measurability of the organization's carbon footprint and the ability to set emission reduction goals (so far, we have measured emissions under Scope 1 and Scope 2);
- ✓ we build environmental and climate awareness among Employees and Co-workers using the internal "Natural Investment" Program;
- ✓ we have started the process of identifying key climate risks.

## SOCIAL RESPONSIBILITY

- ✓ we refine our solutions and expand our product portfolio to meet the needs of our Clients;
- ✓ we support local potential by providing proper conditions and stable employment for over a thousand individuals from local communities around the world;
- ✓ we engage in dialogue with Stakeholders through various means, including annual Employee satisfaction surveys, conducted questionnaires, and in-depth interviews with community representatives as part of the Stakeholder Survey;
- ✓ through advanced technology, we provide our Clients with immediate access to financial markets worldwide;
- ✓ our goal is to promote economic education within society; we expand our open educational resource base with articles, videos, and market commentaries;
- ✓ we develop the activities of the XTB Foundation, through which we share knowledge and experience, cooperating with schools, universities, and other institutions;
- ✓ our qualified, diverse team consists of ambitious individuals whom we support in their continuous development, and achievement of their goals.

## GOVERNANCE

- ✓ through responsible business and management practices, we build value for our Shareholders;
- ✓ we have established ESG management at the Board level of XTB S.A. and created an ESG Team within the company's structure;
- ✓ we prioritize development in the area of business ethics, applying best practices in our daily work;
- ✓ we build transparent communication with Shareholders, the market, regulators and supervisory authorities;
- ✓ we ensure the currency and clarity of our internal regulations and procedures;
- ✓ we have organizational units responsible for internal audit, compliance, and risk management;
- ✓ we are one of the largest online brokers in the world listed on the stock exchange;
- ✓ our operations are subject to financial supervision in international financial markets, including: KNF, FCA, DFSA, and CySEC.

# Our actions towards the UN Sustainable Development Goals



## ENVIRONMENT

- ✓ we implement energy efficiency initiatives;
- ✓ we continue the digitization of documents in additional areas of our business activity;
- ✓ we strive for responsible waste management;
- ✓ we educate our Employees and build a responsible, conscious organizational culture;
- ✓ the building housing headquarters of XTB S.A. has been awarded the British BREEAM certification at the Excellent level;
- ✓ we strive to measure the full carbon footprint of the XTB Group.

## SOCIAL RESPONSIBILITY

- ✓ we develop the XTB Foundation by undertaking new initiatives and fulfilling its statutory goals;
- ✓ we engage in dialogue with Stakeholders;
- ✓ we promote conscious investing through financial and investment education;
- ✓ we build a conscious and responsible organizational culture through education within the "Natural Investment" Program;
- ✓ we support healthy habits among our Employees, work-life balance, and promote physical activity through organized initiatives;
- ✓ we support employee volunteering;
- ✓ we are a Signatory of the „Karta Różnorodności”, develop the area of Diversity & Inclusion and publish the Gender Pay Gap Ratio (GPGR) in our annual reports and on our website.

## GOVERNANCE

- ✓ we integrate transparency and responsibility into our business activities;
- ✓ we implement best market practices and adhere to ethical standards;
- ✓ we have established ESG management at the Board level of XTB S.A. and created a dedicated ESG Team within the company's structure;
- ✓ we integrate ESG aspects into the Group's operational activities across various areas;
- ✓ we have implemented a Code of Ethics and anti-corruption provisions;
- ✓ we maintain transparent communication with the market through stock exchange announcements, published periodic reports, and communication on social media and our website.





**ENVIRONMENT & CLIMATE**



# Environment & Climate

The core activity of the XTB Group involves providing financial services (online trading of financial instruments) and can be characterized as typical office-administrative activities.

The most critical operational activities enabling business continuity and uninterrupted service delivery to our Clients are based on maintaining the necessary IT infrastructure, where the most significant identified areas of environmental and climate impact are the consumption of purchased electricity and the management of electronic waste.



With the above in mind, we identify the impact of our activities (including our product offer and the source of revenues and costs) on the environment and climate as limited compared to the most energy-intensive industries.

Nevertheless, our intention is to take actions to fully measure and monitor the emissions of the XTB Group across three scopes, reduce our carbon footprint, and ultimately achieve climate neutrality for the XTB S.A. Capital Group.

In 2024, as part of the *Double Materiality Assessment*, we identified a list of material topics related to climate change and the circular economy. We also initiated a project to identify key climate-related opportunities and risks, which will enable us to comprehensively manage the area of climate change.



# Environment & Climate



As part of our activities, the most significant areas of our impact on the environment and climate are electricity consumption and electronic waste management. Consequently, we undertake a series of actions aimed at reducing our impact on these areas, such as:

REDUCTION OF ENERGY CONSUMPTION	WASTE MANAGEMENT	DIGITIZATION	EDUCATION
<ul style="list-style-type: none"><li>• rational management of electricity consumption;</li><li>• building a conscious organizational culture through educational activities;</li><li>• purchasing new, energy-efficient equipment;</li><li>• remote or hybrid work model;</li><li>• modern headquarters of XTB S.A. with a range of energy-saving solutions;</li><li>• in-person training replaced by webinars;</li><li>• investor meetings conducted online;</li><li>• striving to measure and monitor the carbon footprint in three scopes.</li></ul> 	<ul style="list-style-type: none"><li>• waste segregation;</li><li>• responsible management of electronic waste, with used electronic equipment handed over to a certified external company;</li><li>• replaced computer equipment that meets appropriate usability parameters offered for purchase by Employees;</li><li>• collection of batteries for disposal and recycling.</li></ul> 	<ul style="list-style-type: none"><li>• Client agreements signed electronically and an automated process for opening investment accounts;</li><li>• digitization of employee agreements;</li><li>• all necessary documents related to the investment account placed electronically in the Investor's Room;</li><li>• supporting Employees awareness to reduce photocopying and printing through information mailings;</li><li>• marketing projects mostly executed without the printed promotional materials.</li></ul> 	<ul style="list-style-type: none"><li>• education by example - waste segregation, reduction of paper consumption, responsible resources management, information campaigns, reduction of plastic and disposable accessories in favor of high-quality reusable products;</li><li>• introduction of the internal educational program "Natural Investment" in 2021, aimed at building awareness, supporting good ESG practices, and initiatives for environmental, climate and social protection;</li><li>• expansion of the Program to branches and subsidiaries to achieve consistency of activities across the entire XTB Group;</li><li>• education through dialogue – engaging representatives of key areas, companies and branches in discussions about good ESG practices as part of the <i>Stakeholder Survey</i>.</li></ul> 

## The modern headquarters of XTB S.A.

From January 2022, the headquarters of XTB S.A. is in the Skyliner office building in Warsaw, which was constructed in accordance with the sustainable construction standard and:

- holds a BREEAM Certificate at the Excellent level;
- uses energy from renewable sources and has obtained an innogy Polska certificate from the E.ON Group, confirming the purchase of guarantees of origin for electricity from renewable energy installations;
- its facade has above-average thermal and acoustic insulation factors, ensuring it does not overheat in summer and does not cool down in winter. The ecological reflexivity helps birds to avoid collisions with the building;
- features a division of elevators into three zones, optimizing waiting time and energy consumption; during elevator braking, additional energy recovery effect is achieved;
- its air conditioning system is based on cooling towers with an added water treatment installation (the most economical and ecological solution adapted to Polish weather conditions);
- has 100% energy-efficient LED lighting. In common areas, lighting is controlled by motion sensors;
- uses photocells for responsible water management in restrooms;
- has modern systems that enable detailed monitoring of utility consumption.



Despite the limited environmental and climate impact of XTB Group's operations, our intention remains to minimize our impact on these areas.

We aim to achieve this particularly through:

- incorporating environmental and climate considerations into the decision-making processes of the XTB Capital Group;
- initiatives to reduce the energy consumption of IT infrastructure;
- using electricity from renewable sources;
- involvement in initiatives for environmental protection and combating climate change;
- responsible management of available resources and increasing the awareness among our Employees;
- responsible management of electronic waste;
- digitization of documents.

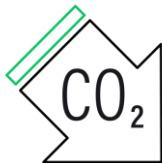


## STRATEGIC DIRECTION

Ensuring sustainable development through a responsible approach to electronic waste management, environmental education of Employees, effective resource management and activities aimed at setting greenhouse gas emission reduction targets within the XTB Group.

## OUR GOALS

for the strategic time frame 2024-2027.



We achieve them through:

Responsible management of electronic waste in the XTB Group.

- ✓ implementation of the Electronic Waste Management Policy within the XTB S.A. Capital Group;
- ✓ introduction of uniform electronic waste monitoring standards within the XTB S.A. Capital Group.

Measuring greenhouse gas emissions ultimately in three scopes.

- ✓ measuring greenhouse gas emissions ultimately in three scopes;
- ✓ continuing the process and monitoring emissions in subsequent reporting periods.

Implementation of a management system for the XTB Group's impact on climate change.

- ✓ development and implementation of the XTB Group Climate Policy;
- ✓ identification and integration of climate risks into the XTB Group's internal Risk Management System.



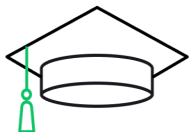
# ESG

**SOCIAL RESPONSIBILITY**

# Social Responsibility

XTB is, above all, about **people**. Our operations are based on relationships built on trust in the XTB brand, placing the individual at the center of our tailored actions for various Stakeholder groups. Regardless of the direction taken, our efforts are characterized by the highest ethical standards and the highest quality of cooperation.

With the well-being of our Employees in mind, we are building a mature and conscious organizational culture. Our qualified team consists of diverse, talented, and ambitious individuals whom we support in their development and in achieving their goals.



If development, then also education. One of our main goals is to promote economic education. We are expanding our repository of materials with articles, video recordings, and market commentaries, and in collaboration with the XTB Foundation, we share our knowledge and experience with schools, universities, and other institutions.

Identifying the needs of our Clients, we are expanding our product portfolio by offering new solutions that meet their requirements. Through innovation and advanced technology, we also ensure instant access to financial markets worldwide, thereby creating value for our Shareholders through our actions.



# Social Responsibility



## OUR STAKEHOLDERS

As part of the *Stakeholder Survey* and the *Double Materiality Assessment* conducted in the first half of 2024, we selected key groups of Stakeholders for the XTB Group, such as:

**RETAIL AND  
INSTITUTIONAL CLIENTS**

**EMPLOYEES  
AND ASSOCIATES**

**MEDIA REPRESENTATIVES**

**SOCIAL ENVIRONMENT**

(people interested in financial education, potential clients, social partners, institutions supporting cultural and sports events, universities and schools, XTB Foundation)



**CAPITAL MARKET REPRESENTATIVES**

(shareholders, individual and institutional investors of XTB S.A., the Warsaw Stock Exchange, analysts and rating agencies)

**MARKET ENVIRONMENT**

(industry organizations, suppliers, business partners in local markets)

**REGULATORY ENVIRONMENT**

(supervisory authorities, i.e. the Polish Financial Supervision Authority, local supervisors in relevant markets)

# Social Responsibility

We are aware of our impact on the social environment. We continuously strive to be a reliable partner for our Stakeholders, regardless of the segment in which we build our mutual relationships.

We develop the area of social responsibility through:

- transparent communication, the best business practices, and responsible marketing;
- the XTB Foundation, which undertakes initiatives in areas such as financial education, charitable activities, and social engagement;
- responsible employee practices, training, flexible employment conditions, pro-employee initiatives, integration events, attractive employment conditions, and non-wage benefits;
- promoting financial and investment education among the public;
- building environmental and social awareness among Employees through the "Natural Investment" Program;
- promoting good health practices, well-being, and sports activities (e.g. we have implemented a cyclical health initiative on Health Day);
- providing a space for the exchange and development of our Employees' passions through year-round "Inner Power" workshops;
- conducting an annual employee satisfaction survey;
- promoting volunteerism among Employees;
- supporting diversity, as we are a Signatory of „Karta Różnorodności” („Diversity Charter”) and strive to develop the area of Diversity & Inclusion.



## STRATEGIC DIRECTION

Ensuring sustainable social development by creating a safe and inspiring work environment, building lasting social relationships, engaging in active dialogue with Stakeholders, and offering services and products that meet Clients' expectations.

## OUR GOALS

for strategic time frame 2024-2027.



We achieve them through:

Updating the remuneration principles at the XTB S.A. Headquarters, while measuring and monitoring the Gender Pay Gap Ratio for the entire Group.

Creating a safe and inclusive work environment for Employees of the XTB S.A. Capital Group.

Intensification of the educational and social activities of the XTB Foundation.

- ✓ implementation of a transparent Remuneration Policy at the XTB S.A. Headquarters;
- ✓ measuring the Gender Pay Gap Ratio in XTB S.A. branches and subsidiaries of the XTB Group.

- ✓ introduction of regular first aid training for Employees at the XTB S.A. Headquarters;
- ✓ development of Diversity & Inclusion within the XTB Group. Introduction of DEI policy.

- ✓ initiatives and activities of the XTB Foundation that address identified social needs.

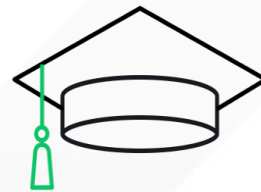


## ECONOMIC EDUCATION

Since the very beginning of our existence, we have placed particular importance on education about the functioning of financial markets. As experts, we have made this goal one of our leading priorities. Not only does it remain in full synergy with business nature of our activities, but also enables sharing our knowledge, experience, and analysis. This allows to build financial awareness while opening investment opportunities through easy and free access to essential knowledge.

XTB's educational activities are carried out through::

- free educational materials prepared by XTB experts;
- dozens of open articles on investment and economics for every level of advancement;
- a variety of topics tailored to individual needs;
- current market news to always keep every interested person up to date;
- trainings and conferences with financial market experts;
- internship programs within the IT Academy;
- cooperation with educational sector institutions.



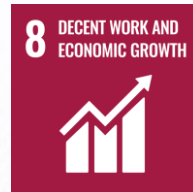
# Social Responsibility

## XTB FOUNDATION

All activities around social responsibility are carried out by the XTB S.A. Capital Group and the XTB Foundation, established in 2020.

The Foundation is focused on undertaking activities in areas such as:

- corporate social responsibility and sustainable development;
- raising awareness and knowledge in economic and financial matters, as well as enhancing trust and respect for financial institutions;
- supporting and organizing initiatives related to the promotion of financial institutions and new technologies;
- promoting employment and education, and equalizing opportunities for development;
- initiating and supporting the activities of XTB Capital Group Employees related to the Foundation's statutory goals, employee volunteering, and all social, educational, and sports activities;
- charitable and social activities.



# Social Responsibility

## DIVERSE WORK ENVIRONMENT



We make every effort to create a friendly, tolerant work environment based on mutual respect. We build diverse teams thanks to Employees who vary in gender, age, education, skills, talents, professional experience, nationality, ethnic origin, religion, beliefs, political views, health status, sexual orientation, and more.

We prioritize the development of our Employees, making XTB an ideal place to acquire, develop, and test skills through engaging in interesting and ambitious projects. We strive to continuously improve our Employee satisfaction rate, which translates into increased engagement and overall well-being.

Our internal documents regulate the prevention of discrimination and bullying, and establish standards for cooperation based on respect, protection against violence, harassment, or unjustified dismissal. We do not tolerate any manifestations of human rights violations or unethical practices, and all Employees and Associates are obliged to respond to identified cases of abuse in accordance with the applicable Anonymous Reporting Procedure. The principles of equal treatment in employment are described in internal documents such as the Work Regulations and are accessible to every Employee. We also strive to ensure pay equity by monitoring the Gender Pay Gap Ratio (GPGR) for the XTB S.A. Headquarters, which is presented in the XTB Group's non-financial reports. We plan to extend the measurement of GPGR to all branches and subsidiaries of the Group.



# Social Responsibility



## EMPLOYEE EDUCATION



We make every effort to enable our Employees to achieve the best possible professional development. We support the growth of their competences by providing specialized training, webinars, programs and courses, including advanced foreign language education. Additionally, we build the environmental and social awareness of our team through the internal "Natural Investment" Program, believing that it is the foundation of a mature organizational culture.

We take actions to promote well-being and build awareness of our Employees, such as:

promoting health care and a healthy lifestyle,  
e.g. through initiatives due to the Health Day

promoting Employees' passions  
and interests through internal  
"Inner Power" workshops

an extra day off  
to celebrate  
a birthday

support for the XTB  
team in football  
and basketball

promoting physical culture  
and sports through  
events sponsoring

providing the  
„Helping Hand“  
well-being platform

organizing flu  
vaccinations

planned regular  
first aid training

promotion  
of employee  
volunteering

joining charity events

communication  
(usually bilingual)  
via the internal Intranet

an additional day  
off for parents



# Social Responsibility



## WORK ENVIRONMENT

We conduct transparent recruitment processes, ensuring candidates have access to necessary information. Thoughtful and advanced recruitment activities allow us to attract talented candidates who build diverse project teams. Our job offers are publicly available and include descriptions of required competencies and employment conditions. Newly hired Employees undergo an onboarding process, guided by an assigned HR mentor who provides support during the first weeks of employment.

We offer our Employees a range of benefits, including:



private medical care



group insurance



benefit platform



platform for learning  
foreign languages



modern  
office



co-financing  
for courses and training

We also appreciate the engagement and contribution to the development of the organizational culture by long-term Employees of the XTB Group through both financial and non-financial benefits, depending on the length of service at XTB.

## FLEXIBLE WORKING HOURS AND INDIVIDUAL APPROACH

One of the benefits is a flexible start time for Employees covered by the standard working time system from Monday to Friday. This option is particularly appreciated by working parents of school-age and preschool children, as it allows them to start work between 7:00 a.m. and 10:00 a.m. and finish after completing the required number of daily working hours. This solution supports our Employees in balancing their various life roles, providing them with the necessary sense of comfort each day and facilitating the maintenance of a work-life balance.



XTB S.A. awarded the title of „Best Employer in the Financial Industry 2024“ by „Wprost“.



# ESG

**CORPORATE GOVERNANCE**

# Corporate Governance



The area of sustainable development is an extremely important element in building the value of the XTB Group. The ESG Strategy complementarily supplements the business strategy of the XTB Group, ensuring the highest standards.

Our offer includes financial instruments (ETFs) that enable investments in climate-conscious entities, and we plan to expand this offering. At the same time, if there is broader interest in products supporting climate risk management (e.g. weather derivatives), we will conduct a thorough analysis of them. As of the preparation of the Strategy, we also use the services of a renowned rating agency, allowing Clients to benefit from professional ESG assessments of selected companies.



## THE ESG STRATEGY BUILDS COMPANY VALUE THROUGH:

- incorporating ESG criteria into the Company's strategic and operational activities;
- transparent communication and reporting of sustainable development in accordance with applicable standards and best practices;
- establishing the ESG Team within the organizational structure of XTB S.A., coordinated by the Sustainability Manager/ Director, who reports directly to the Member of the Management Board for Finance of XTB S.A.;
- ensuring proper communication with Stakeholders regarding the adopted ESG Strategy;
- high standards of corporate governance;
- business ethics in accordance with the Company's Code of Ethics.



## SAFETY AND TRUST



Our operations began in 2004, from the very start adhering to the highest standards and applicable legal regulations. Thanks to bold decisions and responsible actions, we joined the ranks of companies listed on the Warsaw Stock Exchange in 2016. As a publicly traded company and financial institution, we are supervised by the Polish Financial Supervision Authority (KNF), regularly publishing quarterly reports and preparing statements for supervisory institutions at least once a month.

As of the publication date of the Strategy, the XTB Group consists of 12 subsidiaries and 7 foreign branches. We are one of the largest online brokers in Europe and Latin America, present in several countries around the world, including Germany, France, Spain, Portugal, the Czech Republic, Belize, Chile, the United Arab Emirates, Cyprus, and Indonesia. Consequently, our operations are subject to financial supervision in international financial markets by authorities such as the KNF, FCA, DFSA, and CySEC.

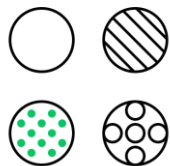
## DIALOGUE AND TRANSPARENT COMMUNICATION



Dialogue and transparent communication allow us to develop our business, build relationships and create a competitive product portfolio. We communicate with Stakeholders through various channels tailored to their needs. In 2024, we surpassed the threshold of one thousand Employees and Co-workers from around the world. This requires operational flexibility and the adaptation of communication language, supported by our internal Intranet platform.

The ESG strategy is a publicly available document, based, among others, on the results of the *Double Materiality Assessment*, and its implementation is reported using established measures in published periodic reports.

Additionally, a meeting with the Management Board of XTB S.A. is held once a quarter, to which Shareholders, Analysts, industry experts and media representatives are invited. During meetings, the Management Board publicly provides answers and explanations to questions posed.



## DIVERSITY AND EQUALITY

Diversity and equality are crucial elements in building the comprehensive and international operations of the XTB Group. We strive to build a mature organizational culture based on respect and tolerance. The Company has implemented a Diversity Policy for the Members of the Management Board of XTB S.A., adopted by the Supervisory Board. The members of the of XTB S.A. authorities are experts in various fields of knowledge and represent diverse industry experience corresponding to their current roles. In 2024, we undertook educational initiatives in the area of Diversity & Inclusion, aiming to develop this within the XTB Group, ultimately introducing a DEI (Diversity, Equity & Inclusion) Policy, which will address practices aimed at increasing diversity, equality, and inclusion in the workplace.



## BUSINESS ETHICS

XTB adheres to a range of regulations related to ethical approach to business, incorporated in the Code of Ethics and the AML Procedure (describing activities and processes carried out by XTB to prevent money laundering and terrorism financing).

The Legal and Compliance Department is headed by the Department Director, who is also a Member of the Management Board for Legal Affairs and reports directly to the CEO of the Management Board. The Legal and Compliance Department is divided into four teams: the Internal Control Team, the Legal Compliance Team, the Operational Support Team, and the Anti-Money Laundering and Counter-Terrorist Financing Team. The ESG activities are also supported by the internal audit unit and the department responsible for the internal Risk Management System. Additionally, ESG matters have been established at the Management Board level, and an ESG Team has been appointed to coordinate and monitor ESG activities within the XTB Group.

# Corporate Governance

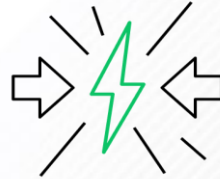


At XTB S.A. there is a **Code of Ethics** that specifies basic norms, rules of conduct and values that XTB Employees should follow.

The Code of Ethics defines the basic ethical principles:



in mutual relations - including provisions regarding equal treatment, the use of vulgar words, discrimination and mobbing



relating to loyalty, integrity and conflict of interest - including provisions specifying situations in which an unacceptable conflict of interest may occur



regarding gifts and loyalty to contractors, business partners and retail customers



## STRATEGIC DIRECTION

Ensuring sustainable development and long-term value through transparent and responsible management of environmental, social and corporate governance aspects in the XTB S.A. Capital Group.

## OUR GOALS

for the strategic time frame 2024-2027.



We achieve them through:

Implementation of a comprehensive ESG approach in the area of corporate governance, incorporating environmental, social and governance aspects.



- ✓ updating the Code of Ethics of the XTB S.A. Capital Group;
- ✓ collecting and organizing applicable anti-mobbing and anti-corruption provisions in separate, dedicated corporate documents.

Incorporation of ESG risks into the internal Risk Management System of XTB S.A. Capital Group



- ✓ identification and integration of social, environmental and governance risks into the internal Risk Management System of the XTB Group.

# Contact



At XTB, we place particular emphasis on maintaining the continuity of our activities and fulfilling our commitments in the area of sustainable development. Accordingly, we have set goals that we will pursue within the established strategic time frame. Undertaking various initiatives will allow us to build environmental and social awareness, not only among our Employees but also among our Clients and business Partners. All actions taken are aimed at supporting the XTB Group on its path toward sustainable development.

At the same time, we aim to continuously increase our involvement in social responsibility projects in cooperation with the XTB Foundation. We will collaborate with additional organizations, share our knowledge and experience, and organize activities aimed at removing barriers and combating exclusion.

The implementation of the ESG Strategy will be monitored and reported in accordance with accepted standards, considering both qualitative and quantitative metrics. This presentation has been prepared by XTB S.A. for informational purposes only. The implementation of the ESG Strategy and initiatives in this area is coordinated by the Sustainability Manager/ Director, who reports directly to the Member of the Management Board for Finance of XTB S.A.

**We are open to dialogue with our Stakeholders,  
and therefore, we invite you to contact us directly  
through the widely accessible communication channels:**

Phone:



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E-mail:



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