



SUSTAINABILITY STATEMENT of the XTB S.A. Capital Group

2024

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Letter from the President of the Management Board

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Dear all,

I am pleased to present XTB Group's first sustainability statement prepared in accordance with the requirements of the CSRD. The drafting of the report and, above all, the analyses that preceded it, allowed us to gain a fresh perspective on all our activities while confirming the validity of the decisions we had taken previously.

At XTB, we provide clients from around the world with innovative financial products that make their money work for them in many different ways. We are present in more than a dozen markets, where we already employ more than 1 000 people and the number of our clients exceeded 1.36 million last year. We already know that 2024 was a record year in many respects and that our business achievements go hand in hand with ambitious sustainability targets.

In 2024, we updated the ESG Strategy, in which we identified strategic directions and targets for the areas of environment, society and governance. In line with our mission and vision, we want to be seen as a trustworthy partner and a provider of reliable investment technology that supports investors in achieving their ambitions in the financial markets whether they want to invest actively or passively. This is why we are constantly expanding our offer by adding new products – last year alone it was enriched with retirement accounts (IKE account in Poland) and products for long-term investment under the tax umbrella (ISA account in the UK). Our clients have also gained faster access to their funds and convenient payments in different

currencies thanks to the eWallet. By combining investing and payments, our clients have gained the ability to manage their finances on a daily basis in one intuitive app.

The year 2024 is an intensive time of preparation for the new requirements and realities of sustainability reporting. During the Double Materiality Assessment, we analysed the processes and invited our employees and external stakeholders to the discussion. For the first time, we have calculated the pay gap and the full carbon footprint at XTB Group scale so that we can effectively manage them in the future. We strive to set realistic and measurable targets for reducing our climate and environmental impact, including on the climate and the environment. We also conducted a climate opportunity and risk analysis, a scenario analysis and implemented XTB Group's first climate policy. In September 2024, we became a strategic partner of the Responsible Business Forum in order to co-create a platform for sharing knowledge, and experiences and building awareness of sustainability. This is particularly important in view of such a changing regulatory environment, but also in view of the staggering civilisational challenges we're currently facing.

XTB's success is built on the commitment, talents and experience of our employees, and ensuring their comfort and satisfaction is our top priority. This was demonstrated by the introduction of a Diversity and Equal Treatment Policy and the launch of a cyclical Health Day, during which we provided access to professional preventive care examinations in our office. Building employee engagement, we invited employees to celebrate Earth Day together and introduced "Inner Power" workshops that allow colleagues to showcase their passions. These are just a selection of the activities we intend to support and continue in the years to come. XTB is also about the teams representing us on local markets, who are committed to building

social, environmental and governance awareness and supporting XTB's reporting. In 2024, they were actively involved in, among other things, the "2 Hours for the Family" campaign and the "Pink October" and "Movember" cancer prevention campaign.

We see sustainability as a path that will only produce results if we follow it consistently. This consistency also manifests itself in the activities of the XTB Foundation, which has established strategic partnerships with the "Trampki na giełdzie" ("Sneakers on the Stock Exchange") Foundation and the Polish Economic Society in order to jointly educate Polish young people about investing and managing finances on a daily basis.

I cordially invite you to continue reading. On behalf of the entire XTB team, thank you for the trust you place in us.

Omar Arnaout
CEO of XTB S.A.

Highlights of 2024:



"Last year was a landmark year for XTB in terms of the sustainability challenges we faced. Today I can confirm with confidence that we have achieved our goals and we will not stop developing this area of XTB's business further."

Paweł Szejko

Member of the Management Board for Finance of XTB S.A.



1. General information

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GENERAL INFORMATION



1. General information

1.1. Basis for the Sustainability Statement

BP-1

The sustainability statement of XTB Group S.A. (hereinafter: "XTB", "Group", "XTB Group") for the period from 1 January 2024 to 31 December 2024 has been prepared in accordance with Chapter 6c of the Accounting Act of 29 September 1994 (Journal of Laws of 2023, item 120, as amended). It presents information on XTB S.A. Capital Group companies in 2024 and has been prepared on the basis of the ESRS (European Sustainability Reporting Standards), introduced by the Delegated Regulation 2023/2772 of the European Parliament and of the Council (EU) of 31 July 2023. The statement has been subject to limited attestation by the independent auditor, PricewaterhouseCoopers Polska sp. z o.o. Audyt sp.k., in accordance with the KSUA 3000 (Z) and KSUA 3002PL standards.

It has not made use of the possibility to omit specific information on intellectual property, know-how or innovation results, in accordance with ESRS 1 Section 7.7 Classified and sensitive information and information on intellectual property, know-how or innovation results, and has not made use of the exemption under Art. 19a sec. 3 and Art. 29a, sec. 3 of Directive 2013/34/EU. Due to the complexity of the sustainability reporting process, XTB Group has chosen to omit the information set out in the Regulation in accordance with the transition periods contained therein. Information on the omissions used is disclosed with each ESRS thematic area.

XTB Group has included in the statement the material impacts, risks and opportunities associated with direct and indirect business relationships in the upstream and downstream value chain identified during the 2024 Double materiality assessment.

Reporting limits

The statement presents information for the period from 1 January 2024 to 31 December 2024. As of 31.12.2024, the XTB Group consisted of 21 entities (13 subsidiaries of XTB S.A. and 7 foreign branches of XTB S.A.). Moreover in 2020 XTB S.A. appointed XTB Foundation.



13 subsidiaries
of XTB S.A.

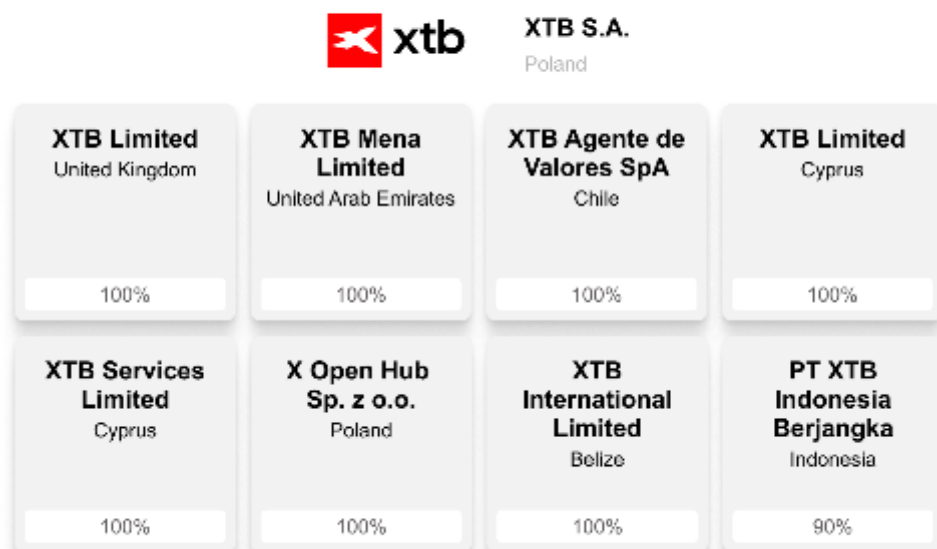
7 foreign
branches



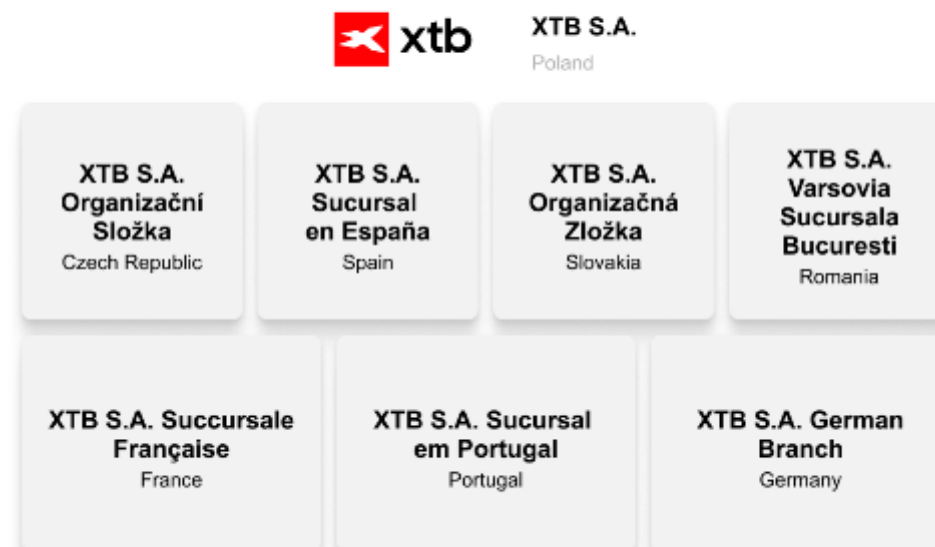
The reporting boundaries adopted differ from the boundaries of the consolidated financial statements and do not include foreign companies of the XTB S.A. Capital Group that were non-operational or in the process of liquidation on the last day of the year under review.

As part of the XTB Group Statement, the following were consolidated:

Companies XTB S.A.



Branches XTB S.A.



BP-2

Comparability of data

Due to the alignment of the sustainability reporting process with EU regulations, the way data is collected, aggregated and presented has changed. The replacement of XTB's existing Non-Financial Information Standard (SIN) with the European Sustainability Reporting Standard (ESRS) has translated into incomparability of the data to the corresponding reporting periods of previous years, hence we consider 2024 as the base year. Where data could not be obtained for the calculation of the XTB Group's greenhouse gas emissions, an estimation method was used, as described in section 2.3.1. Greenhouse gas emissions.

The Group has not deviated from the medium and long-term time horizons set out in ESRS 1 Section 6.4. The measures in the report include value chain data, also estimated using indirect sources, as described in a dedicated location in the document. Despite the existence of estimated data in the area of carbon footprint calculations, the Group does not identify measures and monetary amounts based on a high degree of uncertainty. The methodologies and perspectives proposed in the Statement will enable maintaining a consistent approach in future reporting periods to quantitative and qualitative measures.



1.2. Group management and supervision

GOV-1

Management and supervisory bodies

The composition of the bodies of XTB S.A., the parent company for the branches and companies of XTB S.A., which influences the strategy and operation of the entire XTB Group, is set out below.

The Management Board of XTB S.A.

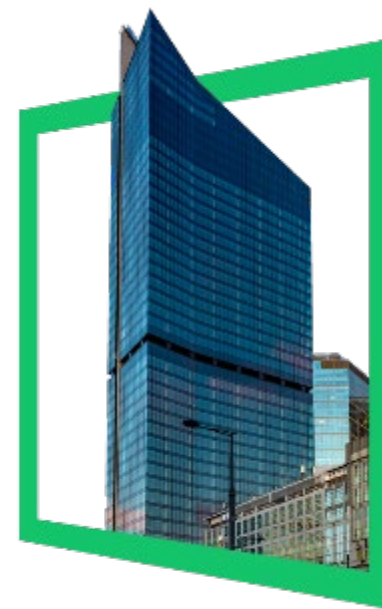
The Management Board has an executive function and is responsible for representing and managing the affairs of XTB S.A. It makes decisions with the best interests of the Company in mind, drafts development strategies and defines its main business objectives. Full professional biographies of the Management Board members, a description of their competences and information on the principles of operation of the Management Board of XTB S.A. can be found in the Corporate Governance section of the Management Board's Statement, chapter *Statutory Bodies of XTB*.

The highest authority for managing sustainability issues is the Management Board of XTB S.A., which translates into effective management of material impacts, opportunities and risks. The direct management and supervision of the area of sustainability was entrusted to Paweł Szejko, Member of the Management Board for Finance, as reflected in the *Internal Regulations of the Finance and Accounting Department*. Board members have the opportunity to expand their knowledge through training, the expertise of the ESG Team and external experts in the areas of:

- aligning sustainability reporting with the requirements of the CSRD and ESRS reporting standards;
- calculation of greenhouse gas emissions;
- financial taxonomy and the non-financial taxonomy of the European Union.

In 2024, as part of his competence development, Member of the Management Board for Finance, who manage ESG Team, completed a course on sustainable development reporting standards, requirements and application examples, conducted by the Education Centre of the Polish Chamber of Statutory Auditors.

The management of the sustainability area is further described in section 1.3. of the Statement.



In 2024 and as at the date of publication of the Statement, the composition of the Management Board of XTB S.A. remained unchanged:



Key management competencies related to sustainability:

- directing and supervising the work of the Board and its members,
- strategic and operational management of XTB's sales activities,
- stakeholder relationship building and after-sales processes,
- human resources management and CSR activities,
- building responsible management practices and governance.



Key management competencies related to sustainability:

- quality management of XTB's investment services and products,
- IT infrastructure management,
- development of XTB's investment products,
- building responsible management practices and governance.



Key management competences related to sustainability:

- management of the sustainability area,
- management of the financial and investor relationship areas of XTB,
- management of the managerial information area and the circulation of confidential information,
- building relationships with XTB S.A. investors,
- building responsible management practices and governance.



Key management competences related to sustainability:

- management and supervision of the risk area,
- building responsible management practices and governance,
- operational and strategic management of the activities of XTB S.A.



Key management competences related to sustainability:

- management of compliance and legal areas,
- activities related to the Internal Control System (ICS),
- support of the Supervision Inspector in overseeing the operation of the Supervision of Legal Compliance (SLC),
- building responsible management practices and governance.

Supervisory Board of XTB S.A.

The Supervisory Board has ongoing oversight of XTB S.A.'s activities also in the area of sustainability reporting. In carrying out this duty, the members of the Body are supported by their wide-ranging competencies and experience gained in many fields. The CVs and changes in the composition of the Supervisory Board in 2024 are described in the Management Board Statement, chapter *Statutory Bodies of XTB*. As of the date of publication, the composition of the Supervisory Board of XTB S.A. was as follows:



Key competencies:

- extensive knowledge of financial markets,
- professional experience in commercial law,
- membership of supervisory boards of public companies.



Key competencies:

- accounting and controlling.



Key competencies:

- economics, finance and investment,
- management and marketing.



Key competencies:

- compliance and legal,
- governance.



Key competencies:

- accounting, finance,
- financial control and audit (certified auditor).

As at the balance sheet date of 31.12.2024, the position of the Chairman of the Supervisory Board was held by Mr Jan Byrski, who, in accordance with current report No. 1/2025, resigned from his position with effect from 15.01.2025. As of 16.01.2025 (RB No. 3/2025), Mr Aleksander Chłopecki took up the position of the Chairman of the Supervisory Board.

Key competencies:

- financial innovation law (FinTech),
- payment, banking and insurance markets,
- legal protection of information,
- administrative proceedings and consultancy.



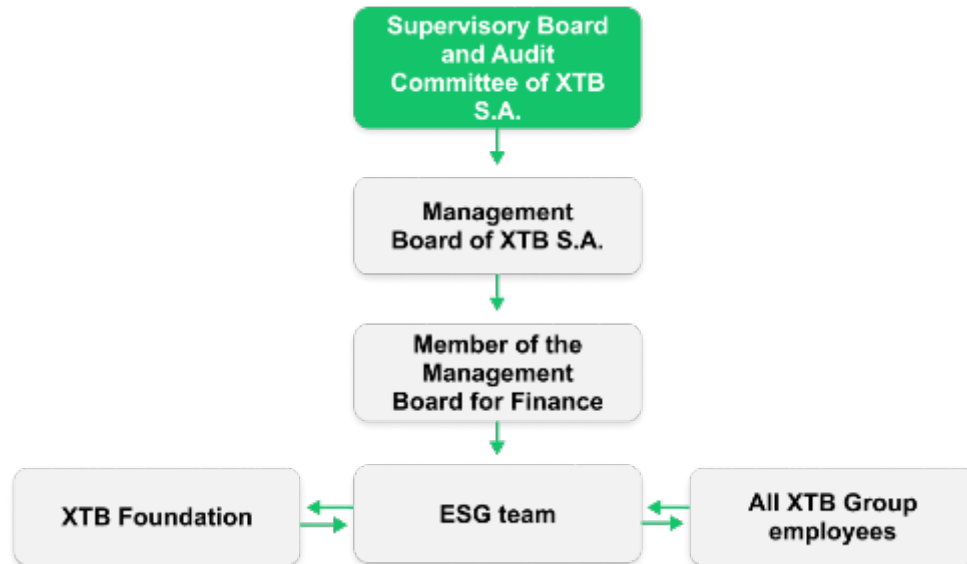


1.3. Sustainability management

The highest authority for managing sustainability issues is the Management Board of XTB S.A. Within the organisational structures, the direct management of the area has been entrusted to Paweł Szejko, Member of the Board of Management for Finance of XTB. He manages and supervises the work of the ESG Team established within the organisational structures of XTB S.A. and consults and presents the results of the work to the other members of the Management Board.

In an effort to integrate sustainability into XTB's operational and strategic activities, environmental, management and social criteria are reviewed by the Management Board during ongoing management activities. Sustainability and impact management topics are addressed at Board meetings as required, at least quarterly.

Governance and supervision structure of the sustainability area



The area of sustainability is subject to ongoing and cyclical reviews:

- on several occasions per month, during the ESG Team's operational reviews with the Management Board Member for Finance, who manages the area of sustainability;
- at least quarterly, as a part of the XTB S.A. Management Board meeting;
- in accordance with current needs during individual meetings with members of the Management Board responsible for a specific area of XTB's business;
- during selected meetings of the Supervisory Board or the Audit Committee of XTB S.A.



Table 1. Scope of responsibility of XTB S.A.'s bodies.

The Management Board of XTB S.A.	Supervisory Board of XTB S.A.
Setting directions, priorities and objectives for the area of sustainability.	Supervision of the development direction, priorities and objectives for the area of sustainability.
Approval and supervision of the work of the sustainability area.	Supervision of the sustainability reporting process.
Ensuring sustainability reporting compliance with legal requirements.	Monitoring XTB's sustainability activities.
Adoption and monitoring of the implementation of the ESG Strategy.	All other tasks and responsibilities resulting from the incumbent law, the Articles of Association and other XTB S.A. corporate documents.
Approval of sustainability area policies and procedures.	
All other tasks and responsibilities resulting from the incumbent law, the Articles of Association and other XTB S.A. corporate documents.	

Commitment of the Management Board and Supervisory Board of XTB S.A. to the activities of the sustainability area in 2024 and up to the date of publication:

- members of XTB S.A.'s Management Board took part in a *Stakeholder Opinion Survey*;
- in-depth interviews were conducted with members of the Supervisory Board of XTB S.A. as part of the *Double Materiality Assessment*;
- the results of the *Stakeholder Survey* and the *Double Materiality Assessment* were presented to the Board for verification and validation;
- the ESG Strategy 2024-2027 was consulted and approved with Board members;
- the Board was consulted on emerging corporate policies and documents;
- direct consultation with Board members on ESG topics was conducted in accordance with their division of competencies and responsibilities;
- Board members attended a workshop on greenhouse gas emissions carried out in collaboration with an external expert;
- Board members attended a workshop on diversity and a webinar on inclusive language (Diversity & Inclusion);
- the member of the Management Board for Finance received training to improve their competences in the area of sustainability;
- one member of the Supervisory Board completed the postgraduate course on "Professional Supervisory Board", where, among other things, he had the opportunity to discuss sustainability issues;
- as of the beginning of 2025, the Director for Sustainability presented a summary of the 2024 ESG activities at the XTB S.A. Audit Committee meeting and discussed the results of the *Double Materiality Assessment* with the identified areas of sustainability reporting for 2024.

GOV-3 Incentive programmes for Company bodies

In 2024, the variable part of the remuneration of the members of the Management Board of XTB S.A. was made conditional on the implementation of the ESG Strategy 2024-2027. In addition to the above, no financial incentives linked to sustainability issues are applied to members of the Management Board of XTB S.A. or the Supervisory Board of XTB.

1.4. Strategy, business model and value chain

SBM-1

XTB S.A. is a Polish brokerage house operating in the FinTech sector, listed on the Warsaw Stock Exchange. It heads the international XTB S.A. Group, which offers investors from all over the world constant and immediate access to international financial markets through its proprietary online investment platform and mobile application.

For more than 20 years, we have based our business model on building solutions to meet our clients' investment objectives through instant access to financial markets from around the world. This happens with the help of our investment platform and application, which are our key technology products that help us reach clients from all over the world. The business model focusing on people as recipients of XTB's services corresponds closely with the directions and objectives of the ESG strategy, which we describe further in the Statement.

In our business, we place great emphasis on geographic diversification of revenues, consistently pursuing a global brand-building strategy based on new capital group entities. The recipients of our offer are individual and institutional clients from all over the world. XTB Group's activities are regulated and subject to supervision by the competent authorities

in the markets in which it operates, including in EU countries under the so-called single European passport.

Our ambition is to be the provider of a universal investment app offering clients easy, smart and efficient ways to trade, invest and save while having instant access to their accumulated funds. We combine our activities with financial education for investors and young people, where we are increasingly making our presence felt. There were no significant changes to XTB Group's business model in the reporting year.

From 2020 onwards, the XTB Foundation operates within the Group, with the help of which we implement the objectives of the XTB Group ESG Strategy.

The object of the XTB Foundation's activities is, in particular:

- raising economic, financial and new technology awareness and knowledge,
- scientific and research activities and promotion of solutions developed as a part of XTB Capital Group's operations;
- supporting and organising all initiatives related to the promotion of financial institutions and new technologies;
- acting in the field of corporate social responsibility, sustainability;
- promotion of education and equal opportunities for development;
- initiating and supporting the activities of XTB Capital Group employees;
- charitable and social activities.



Mission

Our mission is to provide clients around the world with access to an advanced investment platform, professional service and comprehensive financial education. We strive for sustainability and excellence in service delivery, building trust and long-term relationships with our clients to help them succeed in the financial markets.



Vision

Our vision is to be a leading provider of investment products, renowned for innovation, transparency and excellent client service. We want to be seen as a trusted partner, enabling our clients to achieve financial goals by providing an all-in-one platform, knowledge and support needed to invest effectively, with respect for sustainability.



TRUST – We offer over 20 years of experience in the investment industry, high quality of our services and competitive terms of employment. As a result, we are already trusted by more than one million clients and more than a thousand employees and associates worldwide. We are listed on the Polish Stock Exchange and regulated by the world's largest financial market supervisors. We build a secure technological base for our clients' investments and stable employment conditions for our employees.



SUPPORT – We employ experts who are available for our clients 24/7, five days a week. We share knowledge with investors through published educational materials, but we also try to support the youth of Polish schools with the help of the XTB Foundation in building their investment knowledge. XTB employees are offered flexible employment terms and access to training, encouraged to lead healthy lifestyles and share their passions during internal Inner Power workshops.



TECHNOLOGY – We focus on quality, and we are best when it comes to technology knowledge. Thanks to our experts, we are developing our proprietary xStation platform and expanding our investment offering. Over the past quarters, we have opened up to the needs of passive investors and adjusted the offered services to support their needs at every stage of their investment. We secure our IT infrastructure to ensure the continuity of our services.

Business strategy and ESG

A responsible and modern business cannot function without incorporating ESG criteria into its operations. As a fast-growing FinTech that understands the definition of innovation, we identify the need to integrate sustainability into business objectives and integrate them together. We started our journey in 2021 with the development of the first ESG Strategy.

We integrate ESG in business

Responsible practices enable us to meet the strategic business objectives of the XTB Group

- Responsible management practices
- Legal and regulated activities
- Development of technology and investment product portfolio
- Financial education
- Transparent communication
- Responsible marketing
- Fair competition
- Risk management
- Business ethics
- Human rights and competitive employment conditions
- Mature organisational culture
- Staff development and competence building
- Responsible payment practices
- Diversity and flexibility



We are strengthening our activities in the markets of Central and Eastern Europe and Western Europe, where we are already present



We are expanding into new markets, including those in Latin America and Asia



We are developing the institutional business segment with the help of X Open Hub Sp. z o.o.

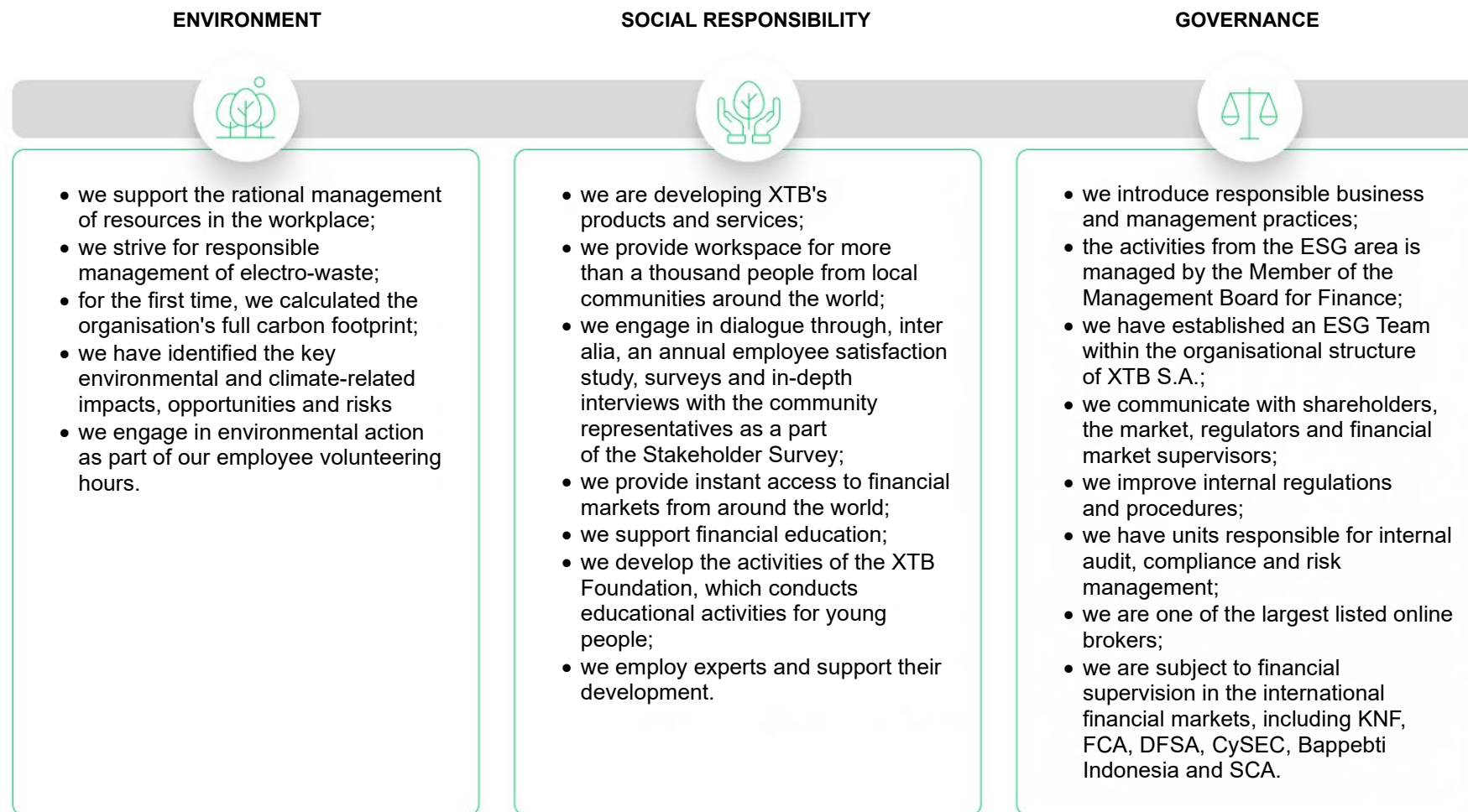


We are expanding the Group's range of products and services and developing new technologies



We are growing through mergers, acquisitions of other entities and joint ventures

Activities in the area of the three pillars of sustainability



We have implemented the ESG Strategy 2024-2027 and identified strategic directions and objectives for each area

ENVIRONMENT AND CLIMATE AREA

We are committed to sustainability through a responsible approach to the management of electro-waste, environmental education of employees, effective resource management and measures to enable the setting of greenhouse gas reduction targets within the XTB Group.

OBJECTIVES

Responsible management of electro-waste in the XTB Group.
Calculation of greenhouse gas emissions target in three scopes.
Implementation of XTB Group's climate change impact management system.

ACTIVITIES DURING THE REPORTING PERIOD:

- we have identified the impacts, opportunities and risks of the environment and climate area;
- we developed and implemented the first XTB Group Climate Policy;
- we organised training for XTB Head Office employees on greenhouse gas emissions;
- we have started the process of identifying and recalculating greenhouse gas emissions;
- for the first time, we undertook to calculate XTB Group's full carbon footprint;

- we have updated the Equipment Procurement and Management Procedure by adding provisions for the management of electro-waste;
- we have introduced special signs in the office space to encourage employees to manage resources rationally;
- we updated our internal educational programme "Natural Investment" and invited XTB Group companies to participate;
- we carried out educational mailings as a part of the "Natural Investment" programme;
- we organised a cleaning-up activity in the Kabaty forest in Warsaw, clothes exchange as a part of our "Zero Waste" campaign and participated in a campaign to collect electro-waste and batteries together with Elektroeko and UNEP/GRID Warsaw.

AREA OF SOCIAL RESPONSIBILITY

We strive for social sustainability by creating a safe and inspiring working environment, building sustainable social relationships, actively dialoguing with stakeholders and offering services and products that meet client expectations.

OBJECTIVES

Updating remuneration policies at XTB S.A. Head Office, while measuring and monitoring the Gender Pay Gap indicator for the entire Group.
Creating a safe and inclusive working environment for XTB S.A. Group employees.
Intensification of the educational and social activities of the XTB Foundation.

ACTIVITIES DURING THE REPORTING PERIOD:

- we carried out a survey and in-depth interviews as a part of the Stakeholder Survey and Double Materiality Assessment;
- we have identified the impacts, opportunities and risks of the social area;

- we have started preparing a professional ESG service to be closer to our stakeholders (expected date is mid-2025);
- we have started work on the development of an XTB quarterly performance evaluation for a uniform remuneration policy for XTB Head Office employees;
- For the first time, we undertook to identify the pay gap for the entire XTB Capital Group;
- we provided a space for our employees to share their passions at the "Inner Power" workshop;
- we organised examinations and consultations for employees on the occasion of XTB's regular Health Day celebrations;
- we organised health checks and workshops for our employees as part of cancer prevention;
- once again, we organised flu vaccinations for our employees;
- for the subsequent year in a row, we took part in the "Two Hours for the Family" campaign, for the first time, all Group companies participated;
- we organised first aid training for our employees;
- we held a workshop on equality and inclusive language as a part of Diversity & Inclusion;
- as a part of the XTB Foundation, we undertook, among other things, to support wards of orphanages, organised a food collection for residents affected by the flood and supported an animal shelter;
- the XTB Foundation has entered into a partnership with "Sneakers on the Stock Exchange" (pol. "Trampki na giełdzie") and is committed to creating educational programmes for high school students;
- the XTB's Human Resources team once again conducted a Satisfaction Survey among employees across the XTB Group;
- we have implemented an Anti-Mobbing and Anti-Discrimination Policy and a Diversity Policy.

MANAGEMENT AREA

We are committed to sustainability and building long-term value through transparent and responsible management of environmental, social and governance aspects at XTB S.A. Group.

OBJECTIVES

Implementation of a comprehensive ESG approach to governance, taking into account environmental, social and management aspects.

Inclusion of ESG risks in the internal Risk Management System of the XTB S.A. Capital Group.

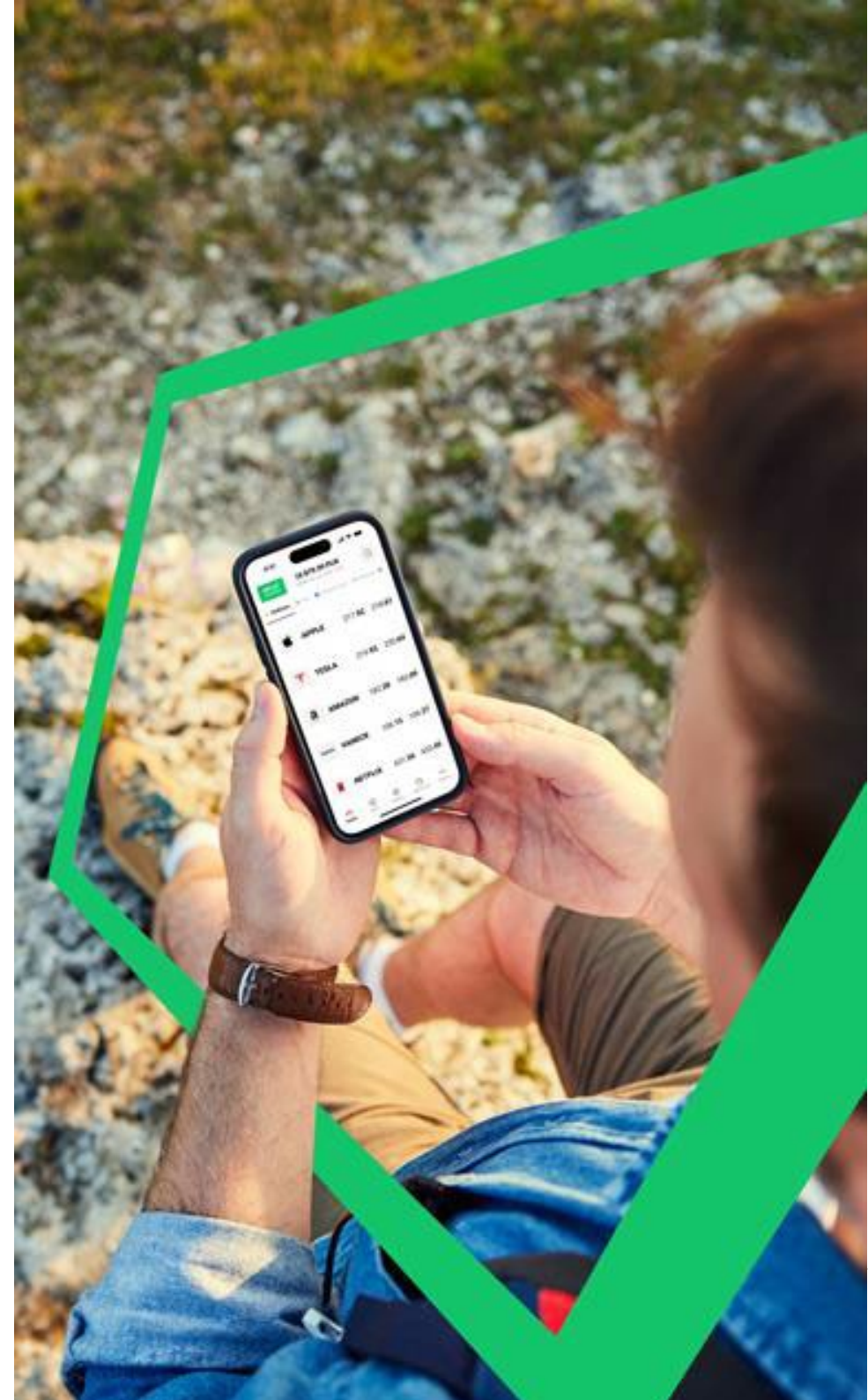
ACTIVITIES DURING THE REPORTING PERIOD:

- we have identified the impacts, opportunities and risks of the governance area;
- we have aligned the sustainability reporting process with ESRS standards;
- we have implemented a uniform Anti-Corruption Policy for XTB S.A. with a clearly indicated channel for reporting violations;
- we have started the process of aligning ESG risks with the XTB S.A.'s internal risk management system.

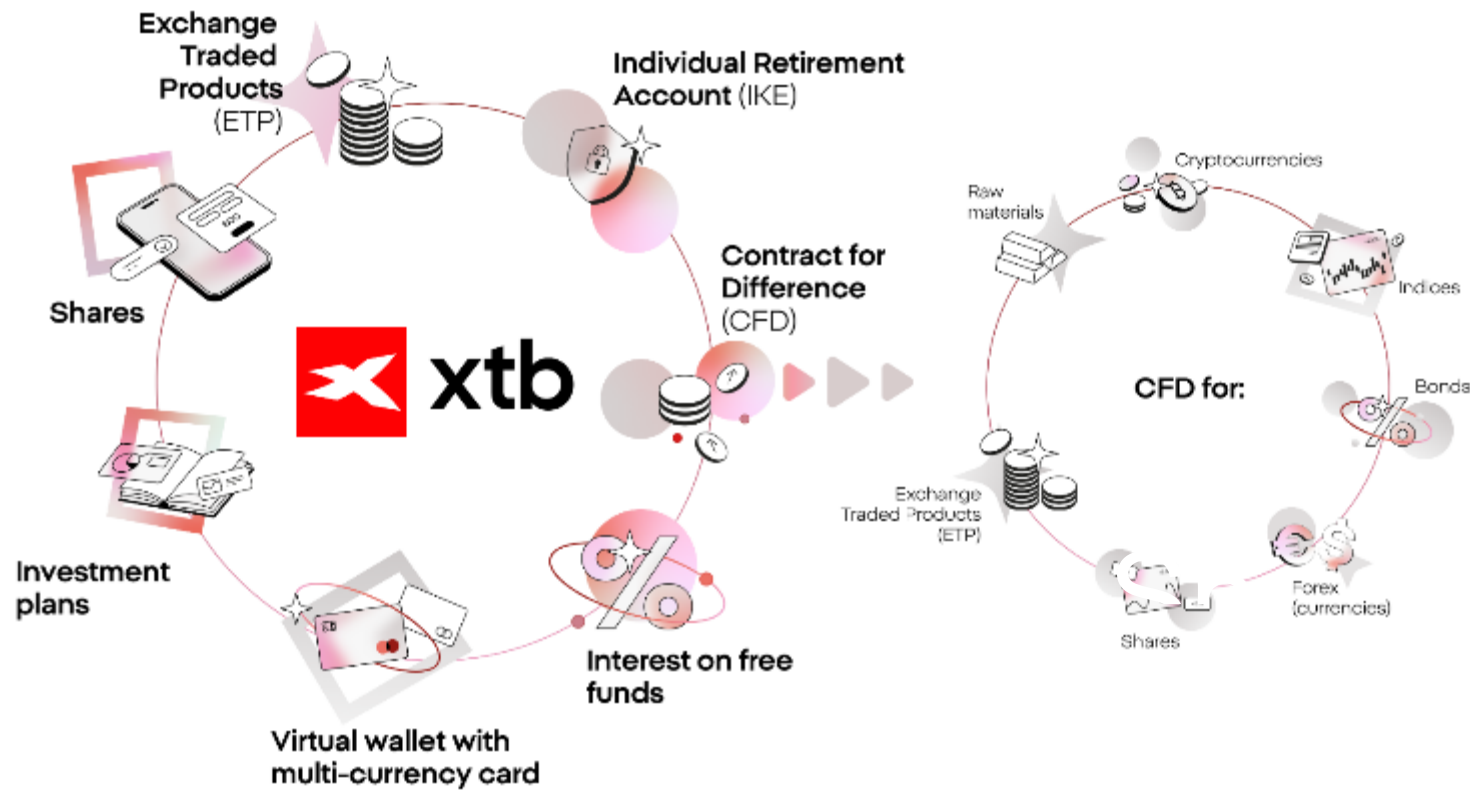
Impact on strategy, business model and value chain

One of XTB Group's key stakeholder groups is the clients to whom we target our offering. Identifying their needs for investment portfolio diversification, in 2024 we expanded our offering by developing technology, the app and our trading platform. The area of sustainability did not determine the shape of the XTB Group's product portfolio, but supported the development of the business through e.g.:

- setting coherent strategic directions for business development while taking into account the supportive role of ESG;
- strengthening dialogue (Double Materiality Assessment) and identifying stakeholder needs;
- supporting staff development and innovation through flexible work mode (where possible) giving them space to manage their time and tasks conveniently;
- taking care of the well-being and comfort of employees – introducing a cyclical Health Day, supporting employees' passions and interests and promoting a healthy lifestyle;
- introduction of ratings expanding the XTB application functionality.



Core products and services



XTB Group offers approx.

6,500

investment products which
can be classified into three groups:

Group 1 | investment
products

Group 2 | passive
investing

Group 3 | finance
management

investment offering

CFDs (Contracts For Difference)

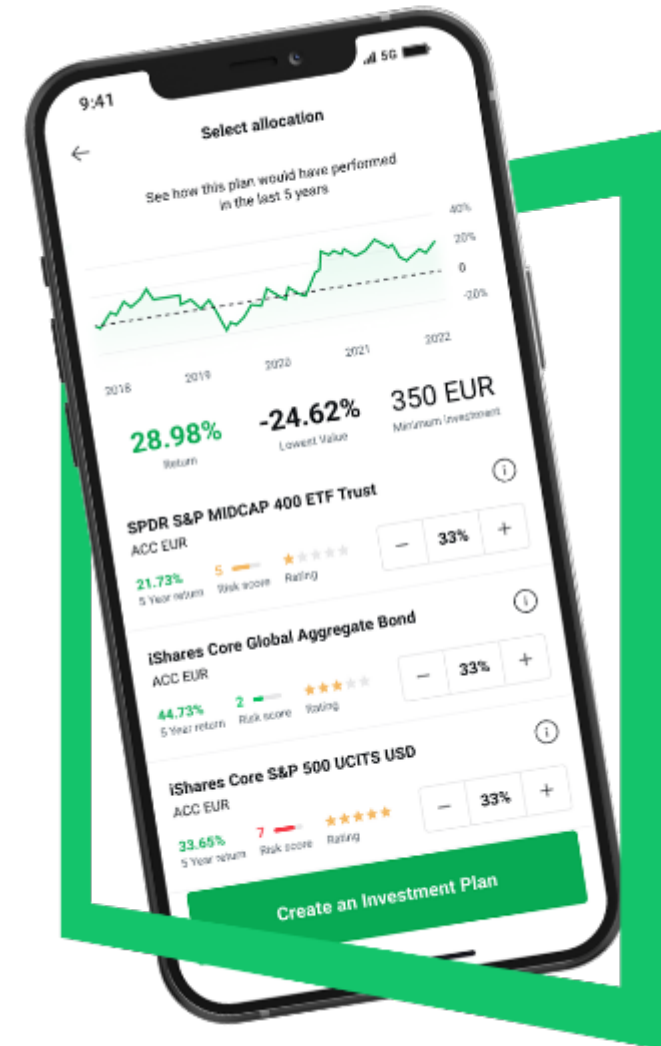
A CFD is a contract between two parties, usually referred to as a "buyer" and a "seller", regarding the movement of the price of a given asset. CFDs are a type of over-the-counter derivative. It is important to note that CFDs are executed with leverage.

Shares

Shares are equity securities that give holders certain corporate and property rights (e.g. the right to participate in the company's general meeting, dividends, participation in the distribution of assets in the event of the company's liquidation). The subject of organized trading are shares without a material form. Shares can be characterised by high stock price volatility, both in the short and long term. XTB offers clients the opportunity to invest in more than 3,500 shares of companies listed on 16 of the world's largest stock exchanges.

ETP (Exchange Traded Products)

ETPs are a group of investment products listed on stock exchanges, of which ETFs (investment funds whose units are listed on regulated markets) are the best known. ETFs allow investment in shares, stock indices or bonds, while ETPs additionally invest in commodities, precious metals or cryptocurrencies. The essence of an ETF is to mirror the return of a reference index by purchasing financial instruments that are part of that index (physical replication) or by using derivatives based on the index (synthetic replication). XTB offers clients the opportunity to invest in more than 1,350 ETFs.



XTB's **passive investing/saving** portfolio in 2024 included:



Investment plans

XTB Investment Plans is a solution dedicated to passive investing that allows you to build an investment portfolio based on ETFs at a low cost. Thanks to the broad market exposure, the investor can achieve a market rate of return with a relatively small commitment of time and energy. The Investment Plans allow you to create your own portfolio of ETFs from as little as PLN 50. XTB offers nearly 350 different ETFs to gain exposure to entire markets, industries or geographical areas.



Interest on free funds

XTB pays clients interest on uninvested funds held in their accounts. The interest rate, which is the basis for determining the amount of interest, is calculated on a daily basis and the interest itself is paid cyclically during the five working days. Interest on the investor's free funds is activated automatically, and there are no minimum or maximum limits on the amount of free funds. Interest rates on free funds are variable and can be changed weekly.



Retirement & investment products

In 2024, we introduced a retirement product in Poland - the Individual Retirement Account (IKE). In the UK, we implemented a solution dedicated to long-term savings - the Individual Savings Account (ISA). In an IKE account, the client has the option to invest in more than 4,000 stocks and ETFs. In addition, all free funds earn interest on it. As part of the ISA account, XTB offers UK clients a variant of the Flexible Cash and Stocks & Shares ISAs, which allows account holders to withdraw and re-deposit funds within one tax year without affecting the annual contribution limit.

Within the segment **of funds handling**, XTB's 2024 portfolio included:



Handling of funds

Virtual wallet with multi-currency card (eWallet)

XTB offers clients a virtual wallet with a card that supports cashless in-store payments, mobile transactions and contactless cash withdrawals from ATMs around the world. The eWallet service allows clients to maintain accounts in seven currencies: EUR, USD, GBP, PLN, HUF, RON and CZK, as well as fast and free transfers of funds between accounts. The eWallet service provides clients with instant access to their funds and payments with a Mastercard-licensed card issued by DiPocket UAB, an Electronic Money Institution registered with the Bank of Lithuania. The eWallet service is currently available for clients in Poland, Czech Republic, Portugal, Romania, Slovakia, Germany and France.



At the end of March 2024, the XTB Social service was launched to allow users in selected markets to receive alerts on the trades of selected traders and to have an overview of their portfolios and key statistics on the trades of the people they were observing while ensuring full anonymisation. In June 2024, the Company decided to suspend this service in the European Union following the Financial Supervision Authority statement of 29 May regarding the conditions for the provision of social trading services by investment firms. In the coming periods, after an in-depth review of this statement, XTB will make a decision on the further implementation of the XTB Social service and its future shape.

Product plans

In subsequent periods, the passive investment offer will be enriched with pension products - IKZE accounts (Individual Retirement Security Accounts) in Poland. We see the potential for further development in the long-term investment segment, therefore, the pension product offer will also be developed in other global markets, e.g. the PEA product (Plan d'Épargne en Actions) in France. Options and cryptocurrencies are also planned for introduction in 2025.

Environmental and social aspects are not a dominant factor in designing the product offer. Nevertheless, XTB's offer includes financial instruments (e.g. ETFs) enabling investments in entities that are climate-conscious or entities classified in indices that take into account ESG criteria. In 2023, the Company added information on the ESG rating for most of the securities of companies in the offer and for ETF instruments to its investment platform.

In 2024 we offered more than 78 ETFs, which provide diversified exposure to stocks or bonds of companies with high ESG ratings (3 and above) with reference to a specific benchmark. Benchmarking the ESG ETFs involves removal of the companies that do not meet the ESG criteria set out in the index methodology from a broader index (the so-called parent index).



Markets served of XTB S.A. Group

As at the balance sheet date of 31.12.2024, XTB Group operated in the following countries:

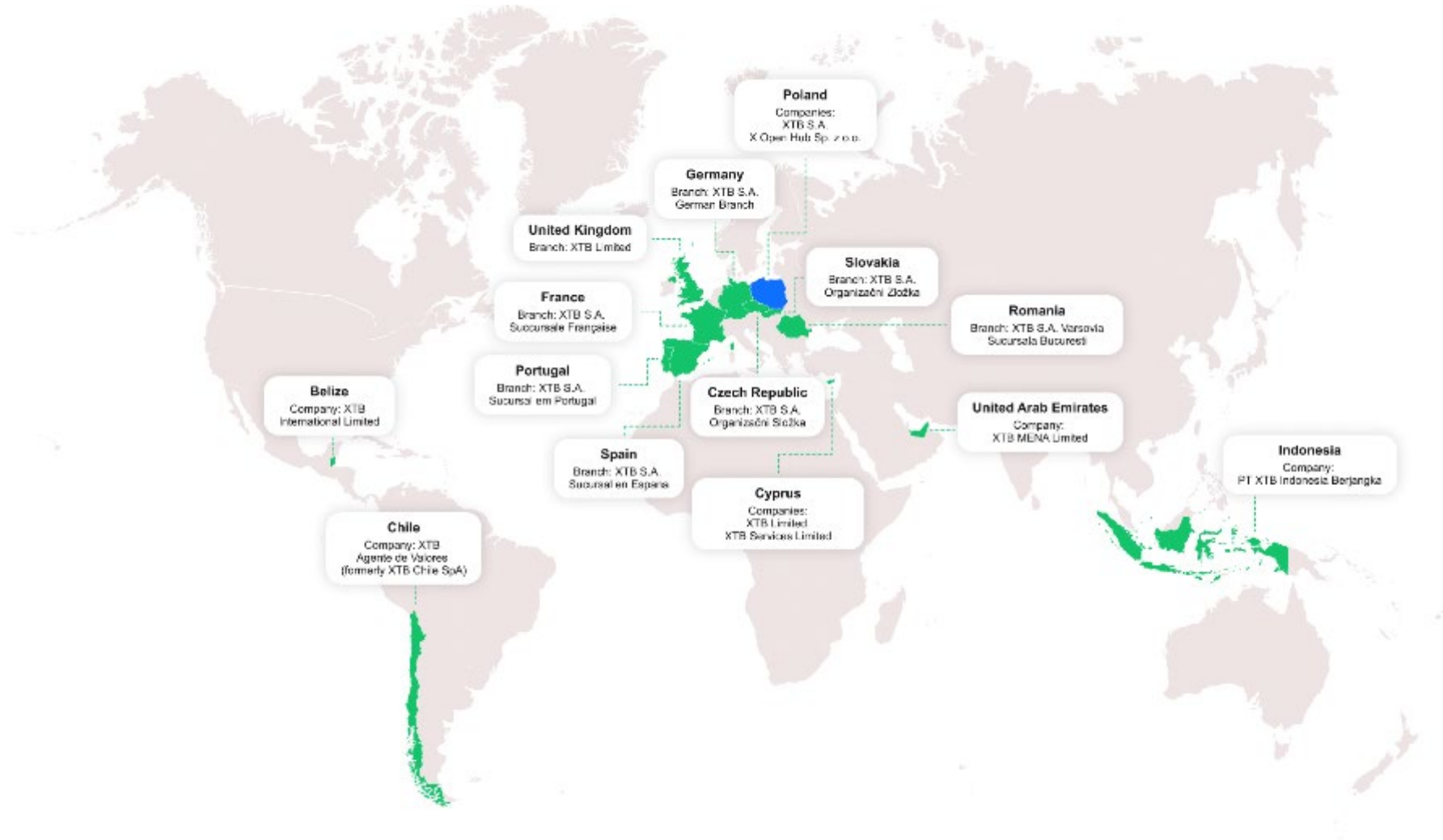


Table 2. Number of employees employed full-time divided between particular units of XTB S.A. as of 31.12.2024.

Company/ Branch	Name	Country	Number of employees
Company	XTB S.A.	Poland	703
Branch	XTB S.A. Organizacyjny Slozka	Czech Republic	33
Branch	XTB S.A. Succursale Française	France	26
Branch	XTB S.A. German Branch	Germany	22
Branch	XTB S.A. Organizacyjna Zlozka	Slovakia	17
Branch	XTB S.A. Sucursal em Portugal	Portugal	20
Branch	XTB S.A. Sucursal en Espana	Spain	20
Branch	XTB S.A. Varsovia Sucursala Bucuresti	Romania	14
Company	XTB Services Limited	Cyprus	8
Company	XTB Limited	Cyprus	2
Company	XTB Agente de Valores SpA	Chile	75
Company	XTB Limited	United Kingdom	32
Company	XTB MENA Limited	UAE	32
Company	XTB International Limited	Belize	3
Company	PT XTB Indonesia Berjangka	Indonesia	7
Company	X Open Hub Sp. z o.o.	Poland	1
TOTAL STAFF			1 015

In order to avoid double counting of employees working simultaneously in several companies within the XTB Group the assumption was made that the employee's employment status and residence were dominant, and the employment contract was considered dominant over other forms of cooperation.

69%

**OF GROUP EMPLOYEES
WORK AT XTB HEADQUARTERS**



XTB Group revenue structure

XTB Group offers investment solutions to more than one million clients globally. With more than 20 years of experience in the industry, XTB's competitive advantage comes from its knowledge, professionalism and ability to make innovative but responsible business decisions. We create the Polish investment market by providing opportunities for our clients and supporting the achievement of their investment goals.

XTB Group's business segments

Main business segments and characteristics of their clients



XTB Group value chain

Contribution

Financial Capital:

equity
cash amount at the
beginning of the year
assets

Human, Intellectual and Organisational Capital:

qualified staff and associates
cooperation with service
providers and equipment
suppliers
XTB's know-how and
proprietary xStation platform
policies and procedures

Social and Relationship Capital:

clients' trust
cooperation with service
providers and equipment
suppliers
shareholders' trust
relationship with XTB
stakeholders

Productive Capital:

rented offices
IT infrastructure

Identified key stakeholders with a stake in each stage of the value chain:



Market environment:
IT solution providers (servers),
social environment



Employees and associates,
regulatory environment, capital
market representatives, media
representatives



Potential clients, clients, market
environment



Clients
- users, social environment

UPSTREAM

XTB S.A. Capital Group's operating activities

DOWNSTREAM

Providers of ICT equipment and services as well as technology solutions to support XTB S.A. Group's operations:

- data centre operators;
- operators of cloud solutions;
- server manufacturers;
- Internet connection providers;
- providers of security and anti-DDoS protection solutions;
- supporting software providers (commercial and OpenSource).

Technical infrastructure required for operation:

- servers and network equipment used to run software, databases, application servers;
- Internet connections;
- operating systems and applications.

Services:

- social media support;
- consultancy services;
- marketing and advertising services.

Core processes:

- Research and development activities within the Product and Technology Department (software development, new product development, use of AI);
- Maintaining the stable and efficient operation of the XTB Platform
- Trading
- Analyst area
- Client Service
- Marketing

Sales:

- The key elements for a successful sales process are:
- Client Service and local representatives;
- Advertising and marketing activities to reach the potential client (social media, TV, radio, mailings, website);
- Group branches and subsidiaries.

Supporting processes:

- Management
- Legal and compliance services
- Business development
- Risk Management
- Internal audit
- Finance and Accounting
- Controlling, Investor Relationships and ESG
- Human resources management
- Administration
- Trainings
- BHF
- XTB Foundation

Client:

- Retail – the main segment responsible for the majority of the Group's revenue;
- Institutional.

Education:

As XTB Group, we are committed to financial education. We share our knowledge by supporting our clients

Usage:

- A user is defined as any active retail Client of the XTB Group with solutions in the form of XTB applications on their media (computer, tablet, phone);
- A user is defined as any institutional Client using XTB solutions

After-sales Client service:

Clients of the XTB Group S.A. can count on a professional support from XTB experts

Client Investments:

Clients have the opportunity to invest thanks to XTB Group's extensive product offering and professional technical solutions

Waste and disposal:

Due to the nature of the XTB Group S.A.'s operations, (a non-manufacturing company) we do not generate a significant amount of waste. Electro-waste, i.e. waste electronic equipment, is disposed of in accordance with current legislation.

Supply of necessary
IT infrastructure, services

Use of XTB products,
waste and disposal

XTB Group's key
processes

Effect

Financial Capital:

amount of equity
net profit
cash amount at the end
of the year

Human, Intellectual and Organisational Capital:

Increased motivation
and qualification of
employees and
associates
XTB's innovation
development and
portfolio expansion
strengthening
governance

Social and Relationship Capital:

acquisition of new
clients
Increased trust among
clients and partners
dividend to
shareholders

Productive Capital:

development of IT
infrastructure

1.5. Key stakeholders

SBM-2

Since XTB's inception, stakeholder feedback has shaped our business, helping to develop our investment offering and motivating the Company to continue to grow. In relation to the different groups of identified stakeholders, we recognise the different needs and opinions that are reflected in our operational and strategic activities. The collected opinions were analysed during the *Stakeholder Opinion Survey* and the *Double Materiality Assessment* performed in 2024, which were presented to and accepted by the Management Board of XTB S.A.

We aim to build value for XTB's stakeholders through the activities we carry out across the different perspectives of our business, seeking to grow while respecting the needs of those involved.



Table 3. Key XTB Group stakeholder groups

MAIN CATEGORIES OF STAKEHOLDERS	DETAIL	MAIN DIALOGUE METHODS AND COMMUNICATION CHANNELS	EXAMPLES OF ENGAGEMENT METHODS	PURPOSE OF THE ENGAGEMENT
Individual and institutional clients	All retail and institutional clients	<ul style="list-style-type: none"> Customer Service Centre Hotline and chatbot Mailings (e-mail) xStation application XTB's offer and product availability Webinars and educational material Advertising and promotional activities Website Social media Surveys 	<ul style="list-style-type: none"> xStation application and platform Expert webinars on the YouTube channel Educational material provided Articles on social media New products on offer from XTB Marketing campaigns and advertising 	<ul style="list-style-type: none"> Activation of existing clients Acquisition of new clients Building trust in the XTB brand Promoting investment knowledge
Employees and associates	All employees and associates regardless of the form of cooperation with XTB	<ul style="list-style-type: none"> Cooperation with employee representatives Internal communication (mailings, intranet) Direct meetings and evaluations Direct contact with the Management Board Procedures and regulations Messages in the office space Employee surveys "Inner Power" series of internal meetings Pro-worker initiatives Employee volunteering Integration events Opportunity to test XTB products 	<ul style="list-style-type: none"> Meetings with employee representatives Communications via Intranet Annual employee satisfaction survey Thematic and sports workshops "Inner Power" Celebration of "Earth Day" and "Health Day" at XTB Health Day at XTB Commitment to the #2h4family campaign Departmental integrations and company-wide events Inviting employees to testing of XTB technical solutions 	<ul style="list-style-type: none"> Getting to know and analysing the opinions and recommendations of employee representatives. Integrating comments into strategic processes and decisions. Tailoring the training to employees' needs and supporting the development of their competences. Reinforcing satisfaction and improving comfort at work. Building awareness, developing positive attitudes and habits.
Media representatives	Representatives of the sector and local media	<ul style="list-style-type: none"> Press releases Direct contact with PR personnel 	<ul style="list-style-type: none"> Ongoing contact and answers to queries Articles written by XTB employees 	<ul style="list-style-type: none"> Promoting the XTB brand and building awareness of XTB's activities. Ensuring access to a direct, reliable and trustworthy source of information.

Regulatory environment	The supervisory authorities, i.e. FSA, local supervisors in the relevant markets	<ul style="list-style-type: none"> ▪ Reports to the FSA ▪ Exchange of letters with the authorities: FSA, Financial Ombudsman, UOKiK ▪ Transparent communication and reliable cooperation ▪ Action in compliance with the law 	<ul style="list-style-type: none"> ▪ Recurring reports sent to the FSA on various areas of XTB S.A.'s operations ▪ Transparency and responsiveness 	<ul style="list-style-type: none"> ▪ Building transparent communication with regulators and supervisors ▪ Fulfilment of legal obligations
Social environment	People interested in financial education, our potential clients, social partners, institutions supporting cultural and sports events, universities and schools, XTB Foundation	<ul style="list-style-type: none"> ▪ Stakeholder Opinion Survey as a part of the Double Materiality Assessment ▪ Product, investor relationships and ESG websites ▪ Advertising and promotional activities ▪ Social media ▪ Educational activities ▪ Pro-social campaigns ▪ Sponsorship ▪ Partnerships ▪ Participation in HR fairs 	<ul style="list-style-type: none"> ▪ Stakeholder survey questionnaire ▪ XTB Investing Masterclass conference ▪ XTB IT Academy ▪ Support for the Koszalin University of Technology Young Investors Competition ▪ Webinars and training ▪ Participation in the Job Festival – Jobicon Trade Fair ▪ Participation in the IT Job Fair ▪ Involvement in charity events, e.g. supporting WOŚP and donating gadgets for auctions ▪ Cooperation with KSW MMA 	<ul style="list-style-type: none"> ▪ Getting to know the preferences and expectations of potential clients ▪ Adapting XTB's offering to meet clients' needs. ▪ Undertaking strategic partnerships. ▪ Searching for talent in the labour market.
Market environment	Sector organisations, suppliers, business partners in local markets	<ul style="list-style-type: none"> ▪ Participation in trade fairs ▪ Direct contact ▪ Advertising and promotional activities ▪ Meetings, sector events and webinars ▪ E-mail 	<ul style="list-style-type: none"> ▪ Digital Investing Revolution conference in London ▪ GeeCON trade fair etc. ▪ CocoaHeads Kraków ▪ Partnership within the 4Developers technology festival 	<ul style="list-style-type: none"> ▪ Building lasting business relationships. ▪ Exchange of knowledge and experience. ▪ Promoting and building trust in the XTB brand.
Capital market representatives	Shareholders, individual and institutional investors of XTB S.A., the Warsaw Stock Exchange, analysts and rating agencies	<ul style="list-style-type: none"> ▪ Current and periodic reporting ▪ Transparent communication ▪ Broadcasts of General Meetings (e-General Meetings) ▪ Investor conferences ▪ Investor materials ▪ Interviews and meetings with Board members ▪ Investor relationships website ▪ Partnerships 	<ul style="list-style-type: none"> ▪ Current and periodic reports ▪ Investor presentations ▪ Investor's calendar ▪ Cooperation with the Association of Individual Investors ▪ Partnership within XTB Wallstreet 	<ul style="list-style-type: none"> ▪ Accommodating shareholder guidance in creating XTB's policies ▪ Tailoring reporting to shareholders' needs ▪ Building shareholders' trust. ▪ Carrying out due diligence reporting and compliance with legal obligations ▪ Transparency in communication with investors

1.6. Material impacts, opportunities and risks

1.6.1. Double Materiality Assessment

IRO-1 / G1 IRO-1 / E1 IRO-1

In preparation for our obligation to report in accordance with the CSRD, European ESRS standards and due diligence rules, we began the process of aligning sustainability reporting with the new regulatory requirements in early 2024. In 2024, we conducted the first Double Materiality Assessment in accordance with the methodology recommended in the ESRS standard content. The input parameters were the identification of key stakeholder groups, processes and the value chain that allowed to structure the process and, based on the structure of the ESRS standards, become the guideline for the Study.

The double materiality assessment was divided into five stages:



During the survey, we focused on the overall operations of the XTB Group. A stakeholder dialogue was conducted at all stages to identify topics for analysis (*Stakeholder Surveys*) and to assess impacts, opportunities and risks.

Step 1: Understanding of the context of the organisation and identifying topics for analysis

The preparatory stage included:

- an overview of the company's basic information,
- an analysis of XTB Group's business environment,
- an analysis of current sustainability practices,
- mapping of the value chain,
- identification and description of the key stakeholder group.

Step 2: Cross-sectional Stakeholder Survey

The stakeholder survey was in the form of an online questionnaire. The study group included:

- XTB Group employees,
- members of the XTB S.A. Supervisory Board,
- XTB clients,
- representatives of other stakeholders (suppliers or business partners/ local communities and/or social partners/ media representatives/ shareholders and investors).

The selection of questions and the group of stakeholders invited to the survey was preceded by a preparatory workshop dedicated to mapping stakeholders and the value chain in terms of mutual influences between them and the Group. In order to get the full perspective of the stakeholders surveyed and as a complement to the survey research, we conducted two rounds of in-depth interviews. The first round included selected addressees of the online

survey, the second round took place after the E, S and G area workshops and included key representatives of XTB S.A. branches and subsidiaries.

As the most relevant ESG issues for the XTB Group, invited stakeholders most frequently identified during the survey:

In the area of **ENVIRONMENT and CLIMATE**:

- for stakeholders in general – responsible management of electro-waste and minimising negative impacts on climate change;
- for employees – responsible management of electro-waste and minimising negative impacts on climate change;
- for suppliers – reducing greenhouse gas emissions and sustainable ICT.

In the **SOCIAL** area:

- for stakeholders in general – security and confidentiality of personal data, effective communication with employees and quality of service and client satisfaction levels;
- for employees – security and confidentiality of personal data and effective communication with employees;
- for Suppliers – effective communication with employees.

In the area of **MANAGEMENT**:

- for stakeholders – business ethics, legal and regulatory compliance, anti-corruption practices and counteracting corruption, bribery and money laundering. The importance of these areas is highlighted in the responses of each stakeholder group;
- for clients – fair competition, anti-corruption, anti-bribery and anti-money laundering and business ethics.

Among the important topics for the Group, stakeholders also identified the Group's involvement in educational activities (both raising awareness of environmental issues among employees and activities regarding financial management and aimed at children and young people). Among the suggestions of the interviewed entities, the topic of greater involvement

of the Group in charitable and social actions (e.g. planting a forest, picking up waste in public places, etc.) often came up.

The results of the Stakeholder Survey have directly influenced the current shape of the ESG Strategy, helping to set development directions dedicated to the areas of environment, society and governance, and objectives that will respond to identified stakeholder needs. They also influenced the decision to intensify the activities of the XTB Foundation, especially in the area of financial education.

Step 3: Preliminary double materiality assessment: Assessment of impacts, risks and opportunities

To analyse the double materiality of sustainability issues, a series of workshops were held on assessing the actual and potential impacts on people and the environment, and the Group's risks and opportunities related to the social, environmental and organisational governance issues identified in the ESRS standard. The 5 workshops related to areas E, S and G were attended by managers and specialists from XTB's key areas and experts from the consultancy companies, resulting in the identification of material ESG impacts, risks and opportunities from a corporate perspective.

Steps 4 and 5: Selection of relevant topics and validation of the materiality matrix

In examining the materiality of an impact, we considered the likelihood of the impact in question occurring by time horizon (for potential impacts) and the severity of the impact in question (taking into account the scale, extent and nature (reversibility) of the negative effects). Financial materiality was assessed based on the probability of the risk/opportunity by time horizon and the scale of the financial effects on the company should the risk and/or opportunity materialise. Appropriate cut-off thresholds were adopted to establish the materiality of the topics.

XTB S.A.'s Board members were involved in deciding on the final materiality of the sustainability area topics and approved the final list of material topics that formed the basis for identifying the ESRs disclosure list. The identified impacts, opportunities and risks formed the basis of the updated ESG Strategy 2024-2027. The risks have been aligned with the internal Risk Management System and will subsequently be incorporated into it. An annual review of the effects of the materiality study will be carried out by the XTB ESG Team, with results updated as required.

In 2024, based on the results of the Dual Materiality Study, we conducted a climate scenario analysis of the identified climate risk based on the TCFD guidelines:

Physical risk - Risk of external events (business continuity risk) due to the possibility of sudden, extreme weather events in the locations of some companies and branches of the XTB Group.

Two scenarios were constructed that present probable, hypothetical development paths, dependent on global emission paths and the resulting average temperature increase: the "2°C or lower" scenario and the "4°C" scenario. These scenarios were selected due to the best data availability. Key assumptions regarding the scenario analysis methodology and risk assessment are presented in Chapter II Environment of this Statement.



1.6.2. Material impacts

SBM-3

The Study identified 11 material reportable topics on which XTB Group has a material impact (impact materiality) or which materially affect XTB Group's business (financial materiality). In order to identify the areas that, in our view, require the greatest commitment and increased intensity of action, we have categorised the identified topics into 3 groups of varying management priority:

- I. **High priority** – topics of highest management priority against which appropriate resources should be allocated; both new topics (previously unmanaged but relevant to the organisation) and topics previously identified as crucial from the organisation's perspective.
- II. **Moderate priority** – covering important topics for which organisational resources should be increased, but which are not the highest priority for the organisation.
- III. **Standard priority** – covering topics already known and managed by the XTB Group that are not core to the Group's business.

Analysing the impacts, opportunities and risks identified, we rate the resilience of our business model as high, the ability to exploit opportunities alone as satisfactory.



Table 4. Material topics and impacts for XTB Group arising from the Double Materiality Assessment.

Topic identified in the materiality assessment	Description of impact	Type of impact: Negative (actual and potential)	Type of impact: Positive (actual and potential)	Impact on humans or the environment	Link to strategy and business model	Current and anticipated effects	Time perspective of the impact and action taken	Priority	Place of origin of the impact
E1: CLIMATE									
Climate change mitigation.	The current impact of climate change on the XTB Group's operations can be observed particularly in certain locations of XTB's global offices, which are particularly at risk of extreme weather events. XTB Group's impact on climate change is related to its core business based on the use of IT infrastructure (including servers) and the expansion of XTB Group's operations. This involves increased electricity consumption and may result in an increase in the Group's greenhouse gas emissions.	Actual negative impact regarding energy consumption of servers as part of their standard use process.	Potential positive impact that may result from optimizing energy consumption.	Activity of the XTB Group's activities related to the use of IT infrastructure and energy consumption has an impact on the environment.	The impacts are linked to the XTB Group's Business Strategy and business model in the areas: – expansion and development of XTB activities; - ESG Strategy objectives and actions.	At the time of publication of the Statement, the perceptible effects of the identified impact are not identified. Anticipated effects may include an increase in energy consumption and the severity of extreme weather events at certain Group office locations.	We identify the occurrence of the impact in the short, medium and long term of our business.	Standard priority	Own operations
Energy		Potential negative impact that may occur as a result of increasing emissions from activities due to increased electricity consumption.					Our activities: – successive replacement of the IT infrastructure at the end of its life cycle with newer, more energy-efficient infrastructure; – using RES energy where possible; – aiming to calculate the full carbon footprint of an activity, which will enable to observe emissions trends of XTB Group over several years.		
S1: OWN WORKFORCE									

Working conditions	<p>The XTB Group has a strong, direct and multifaceted impact on employment security, working time, adequate pay, dialogue, freedom of association and the work-life balance of its own workforce (by which we mean employees under employment contract and coworkers employed under civil law contracts).</p>	<p>Potential negative impact that may occur in the event of deterioration of employment conditions.</p>	<p>Actual positive impact through implemented policies, employee regulations and activities such as cyclical employee assessment, annual employee satisfaction survey or work-life balance initiatives.</p>	<p>We identify a material impact on our own workforce through:</p> <ul style="list-style-type: none"> – terms and conditions of employment offered; – flexible working time and mode; – competitive terms and conditions of employment; – diversified remuneration rules for IT employees and other employees (as a result of the 	<p>The impacts are linked to XTB's Business Strategy and ESG Strategy through:</p> <ul style="list-style-type: none"> – business objectives for the development of the Group's activities; – the ESG Strategy's objectives of aligning remuneration principles across the XTB Group and structuring employee policies. 	<p>XTB's impact can translate, on the one hand, into increased employee satisfaction, strengthening XTB's corporate culture and position as an employer, and attracting talent from the labour market. On the other hand, a negative impact can lead to a loss of talent, increased turnover, an outflow of knowledge, experience and know-how from the organisation.</p>	<p>We identify the impact in the short, medium and long term of our business.</p> <p>Actions:</p> <ul style="list-style-type: none"> – actions taken towards harmonisation of remuneration rules; – competency audit in the organisation; – flexible working conditions in most positions (ability to adjust start times and working mode); – annual employee satisfaction survey; – cyclical employee appraisals; – policies and procedures implemented and improved; – pro-employee measures taken; – employee representatives appointed; – projects of the Human Capital Management department, (e.g. harmonisation of remuneration rules and pay gap analysis); – implementation of an internal communication 	High priority	Own operations
		<p>Actual negative impact through differences in IT employee salaries relative to other employees, resulting from the characteristics of salary formation in the IT industry.</p>	<p>Actual positive impact through flexible employment conditions.</p>	<p>Actual positive impact of competitive employment conditions and plans to update the remuneration policy.</p>	<p>Actual positive impact through rapid development of intra-corporate communication in relation to the growth dynamics of the XTB Group;</p>				
		<p>Actual negative impact of intra-corporate communication that does not keep up with the dynamic development of the XTB Group.</p>	<p>Actual positive impact of intra-corporate communication that does not keep up with the dynamic development of the XTB Group.</p>						
		<p>Potential negative impact that may occur in the event of a possible reduction in the number of</p>							

employee representatives.	Actual positive impact through the activities of a group of selected employee representatives.	– employee representatives; – work-life balance measures.	
Potential negative impact that may occur in the event of insufficient internal regulations regarding work-life balance.	Actual positive impact through flexible employment conditions, the ability to adjust start times and work mode (remote/hybrid/s tationary).		platform and informational mailings; – return to cyclical meetings with the CEO to discuss the company's strategic directions; – stakeholder survey as part of a double materiality assessment; – "Helping Hand" well-being platform.

Equal treatment and equal opportunities	The XTB Group's impact in the area of equal treatment and equal opportunities is based on the measures taken to equalise opportunities and manage the pay gap, the management of the training area, but also implementing a uniform anti-mobbing policy and the diversity policy.	Potential negative impact that could occur if the pay gap between women and men widens. Potential negative impact that could occur if there is insufficient training.	Actual positive impact through actions aimed at equalizing opportunities, initiating the process of verifying salaries in terms of the pay gap. Real positive impact through organized training, the possibility of co-financing employee training and actions improving the area of training.	We influence XTB employees and associates through activities aimed at equalizing opportunities, identifying the pay gap, funding and access to training, introducing the Anti-Mobbing and Anti-Discrimination Policy, activities and introducing the DEI Policy.	The impacts of this area were translated into the ESG Strategy's objectives of creating an anti-mobbing policy, a DEI policy and identifying the wage gap;	Identified positive impacts can strengthen the organisational culture, and translate into increased employee competence, greater employee comfort, reduced personnel turnover and increased talent retention in the organisation. On the other hand, identified negative	We identify the impact in the short, medium and long term of our business. Actions: – work on calculating the wage gap; – review of remuneration policy and start of process of building a process of regular assessment; – training preference survey carried out; – clear rules for subsidising training, courses and postgraduate studies; – internal training organised by the training department.	High priority	Own operations
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impacts, e.g. a potential increase in the pay gap may translate into an increase in the sense of inequality, negative assessments in the annual employee satisfaction survey and increased employee turnover.

- subsidised courses, studies and training at the employee's request;
- whistleblowing channel implemented and communicated to employees;
- Management Board training in the area of diversity;
- employee training in inclusive language;
- invitation to female members of company bodies (Supervisory Board of XTB S.A.).
- training on Diversity & Inclusion;
- DEI policy implemented
- Training policy implemented.

ESRS S4: CONSUMERS AND END-USERS

Impact of information on consumers or end-users	XTB Group, as a provider of financial products and services, influences clients through the quality of communication, offerings and documentation, the level and accessibility of Customer Service, the communication channels made available to clients, educational materials and activities,	Potential negative impact that may occur in the event of insufficient listening to the opinions of XTB clients.	Actual positive impact through shared reporting channels for clients and support from the Customer Service department.	We influence our clients through XTB's investment product offering, free educational materials and transparency in communication.	The impacts are reflected in the XTB Group's Business Strategy and ESG Strategy objectives and are driven by its business model.	Failure to listen sufficiently to client feedback can lead to a mismatch between offerings and market needs and a loss of clients. Measures to improve the quality of communication, offerings and client	We identify the impact in the short, medium and long term of our business.	High priority	Own operations Downstream
Social inclusion of consumers or end-users		Potential negative impact that may occur as a result of insufficient investment knowledge	Actual positive impact through high level of communication with the client, complete client				Activities: – communication channels made available, e.g. helpline; – qualified Customer Service department; – analysis of client feedback and		

decisions supported by the analysis of client opinions, and access to information.	of clients, misunderstanding the specifics of investment products that carry the risk of loss. Potential negative impact that may result from communication bearing the characteristics of greenwashing.	documentation and shared educational materials. Actual positive impact through building media coverage based on real actions supported by evidence and the actions of the XTB Foundation in the area of financial and investment education.	relationships can result in a strengthening of trust in the XTB brand, the acquisition of new clients and fewer complaints.	presentation of proposals; – a channel for irregularities and complaints made available; Activities: – transparent presentation of products and XTB services; – regulated activities in compliance with the law; – complete client documentation; – free educational materials, economic commentary by XTB experts; – action-only social media communication; – liaising with the communications department as part of the ongoing communication.
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ESRS G1: CONDUCT OF BUSINESS

Management of relationships with suppliers, including payment practices	The XTB Group influences relationships with business partners through timely payments.	Non-identified	Actual positive impact through building cooperation with responsible suppliers and business partners and no delays in payments.	The XTB Group influences its suppliers by reducing payment delays.	Building good relationships with XTB's business partners.	Practices resulting from XTB's responsible governance.	Standard priority	Upstream Own operations
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Corruption and bribery	As a financial services provider, XTB Group operates in a highly regulated industry where transparency and integrity are paramount. We influence the anti-corruption area through the internal regulations implemented, the whistleblowing process and the implementation of an anti-corruption policy. The potential impact in the form of the occurrence of corruption could undermine confidence in XTB's operations among clients and investors.	Potential negative impact that may result from possible corruption cases.	Actual positive impact through implemented internal regulations, the process of reporting violations, the establishment of units responsible for audit and compliance, and the implemented Anti-Corruption Policy at XTB S.A.	The area of anti-corruption affects XTB Group stakeholders. The impact stems from both the internal regulations implemented, the whistleblowing process, the appointment of an audit and compliance unit and the implementation of an anti-corruption policy. A potential negative impact may materialise if a case of corruption occurs.	The impact of this area is reflected in the 2024-2027 ESG Strategy objective to create an anti-corruption policy. This target was met in the last quarter of 2024.	If cases of corruption occurring, XTB's reputation and confidence in the XTB brand could be damaged. Failure to comply with these regulations can result in hefty fines, sanctions and even the revocation of operating licences. On the other hand, a well-secured anti-corruption action process minimises the risk of breaches.	Actions: – implementation of XTB S.A.'s Anti-Corruption Policy – whistle-blowing procedure and incident register; – internal audit, compliance and legal departments overseeing processes and the timeliness of procedures; – planned update of the Code of Ethics.	Standard priority	Upstream Own operations Downstream
Other: Data protection.	The XTB Group processes data of many groups of its stakeholders in the course of its activities, including as a provider of investment products and services processing personal data of its clients. This impact is secured by implemented data protection security systems (including	Potential negative impact that may occur as a result of data processing where there is a risk of leakage or breach of personal data.	Actual positive impact through implemented data protection security systems (including personal data), creation of data back-ups in the event of unforeseen circumstances, diversification of	There is an impact on people as a result of the data protection safeguards implemented. There may be a potential negative impact in the event of data leakage.	The impact is related to XTB Group's business model, which identifies offering investment products and investment solutions to our clients as the core of XTB Group's business, which clearly involves data processing.	In the event of a data leak, the impact results in damage to XTB's image, disrupting client trust in XTB. Data processed by the XTB Group is adequately protected in the event of	Activities: – modern and updated network and system security; – training and information campaigns among employees.	Moderate priority	Upstream Own operations Downstream

	personal data), back-ups created or diversification of XTB's locations.		IT infrastructure locations.			unforeseen circumstances.			
Other: Quality of reporting	XTB S.A., as a public interest entity listed on the Warsaw Stock Exchange, has a sustainability reporting obligation. The XTB Group's influence manifests itself through the quality of its reporting process and the reports it publishes.	Potential negative impact that may result from insufficient ESG reporting.	Real positive impact through a transparent reporting process in accordance with the law.	The XTB Group impacts people through the quality of its reporting process, its compliance with legislation, its completeness and its transparency.	The impact is linked to the ESG Strategy, which underpins the activities of the XTB Group's sustainability area.	XTB S.A. has been compliant with its sustainability reporting obligation since 2020. Failure to comply with the law can translate into reputational damage and penalties.	Activities: – keeping abreast of legal developments and trends; – adapting and improving the sustainability reporting process in advance; – working with qualified advisors in the reporting area; – independent auditor's investigation. – employing qualified staff.	Moderate priority	Upstream Own operations Downstream

SBM-3 / E1 SBM-3 / S1 SBM-3 / S4 SBM-3

1.6.3. Material opportunities and risks

Table 5. Material opportunities and risks in the environment and climate area

Topic identified in the materiality assessment	Description of material risk/opportunity	Link to strategy and business model	Current and anticipated effects	Individual resilience and risk/opportunity management	Current and anticipated financial effects	Location where the risk/opportunity arises
Climate change	Risk of external events (business continuity) due to the possibility of sudden extreme weather events at the locations of some XTB Group companies and branches (violent storms, earthquakes, hurricanes, floods). A locally significant risk due to staff safety and the potential for possible loss of IT infrastructure components.	The risk does not arise from XTB's strategy and business model.	Identifying a target in the ESG Strategy for the creation of a climate policy. No impact on the business model, value chain or decision-making process.	i. flexible forms of employment, especially when the threat of remote working is identified; ii. diversification of the locations of XTB offices and branches; iii. diversification of the locations of XTB's IT infrastructure; iv. XTB's main IT infrastructure located in places not at risk from extreme weather events; v. security of IT equipment in offices where there is a higher probability of risk due to their location; vi. implementation of the XTB Group Climate Policy.	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations
Climate change	Opportunity to increase competitiveness and develop reputation and business resilience through climate change action taken.	The opportunity stems from the assumptions made in the ESG Strategy.	No influence on strategy, business model, value chain and decision-making.	i. implementation of the XTB Group Climate Policy ii. promoting and building awareness of resource efficiency iii. digitalization of documents iv. use of energy from RES v. responsible management of IT infrastructure and electro-waste	No current financial effects. The Group is unable to estimate the financial impact of the opportunity.	Own operations

Table 6. Material opportunities and risks of the society area

Topic identified in the materiality assessment	Description of material risk/opportunity	Link to strategy and business model	Current and anticipated effects	Risk/opportunity management	Current and anticipated financial effects	Location where the risk/opportunity arises
Own workforce	Human resource and reputational risks relating to the loss of qualified staff and increased personnel turnover as a result of, for example, insufficient attention to employee welfare and work-life balance, insufficient training or insufficient internal regulations on mobbing and discrimination.	The risk does not arise from XTB's strategy and business model.	Identification of strategic objectives for implementing a transparent Remuneration Policy, cyclical first aid training and introduction of a DEI policy (completed). No impact on the business model. The possible impact of risk on the organisation's own workforce and decision-making process.	i. competitive employment conditions and benefits (including access to the well-being platform "Helping-Hand"); ii. flexible forms of employment; iii. annual employee satisfaction survey; iv. crew representatives representing the interests of employees before the Management Board; v. pro-employee initiatives promoting preventive health care and healthy habits.	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations
Own workforce	An opportunity to attract talent, strengthen the organisational culture and increase XTB's attractiveness as an employer through pro-employee activities implemented within the ESG area.	The opportunity stems from actions implemented as part of the ESG Strategy.	No influence on strategy, business model, value chain and decision-making.	i. creating a modern and developmental working environment ii. ensuring competitive employment conditions iii. flexible forms of employment iv. HR procedures and policies v. activities and initiatives undertaken vi. implementation of ESG strategies	No current financial effects. The Group is unable to estimate the financial impact of the opportunity.	Own operations
Consumers and end-users	Product (client complaints) and reputational risks associated with client complaints as a result of, for example, the failure	The risk does not arise from XTB's strategy and business model.	No influence on strategy and business model. The possible impact of risk on value chain	i. continuous monitoring of IT systems and infrastructure; ii. clear and transparent and legally compliant provisions of XTB documents and agreements;	No current financial effects. The Group is unable to estimate the financial	Own operations Downstream

	of XTB's services, misunderstanding of the provisions of XTB's documents and agreements (despite their completeness, availability and transparency) or taking investment risks despite insufficient investment preparation (e.g. by investing in leveraged financial instruments).		stakeholders and organisational decision-making.	iii. educational materials made available to build investment knowledge and awareness of investment products and the risks they entail; iv. MiFID survey determining the appropriateness of services to clients' knowledge, experience and preferences and their risk appetite.	effects of the risks.	
Consumers and end-users	Risk of reputational damage, loss of clients and key business partners associated with a reduction in the quality of XTB Group's services as a result of deteriorating employment conditions, ineffective employee policies resulting in increased turnover, loss of talent and key employees.	The risk does not arise from XTB's strategy and business model.	No influence on strategy and business model. The possible impact of risk on value chain stakeholders and organisational decision-making.	i. competitive employment conditions and benefits (including access to the "Helping-Hand" well-being platform); ii. flexible forms of employment; iii. annual employee satisfaction survey; iv. crew representatives representing the interests of employees before the Management Board; v. pro-employee initiatives promoting preventive health care and healthy habits;	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations Downstream
Consumers and end-users	An opportunity to strengthen XTB's brand and competitive advantage by building a position as a responsible entity that stays ahead of market and regulatory trends, cares about the quality of services and security of transactions, and takes into account particularly critical client feedback.	The opportunity does not stem from XTB's strategy and business model.	No influence on strategy, business model, value chain and decision-making.	i. developing XTB's technology and innovation ii. following trends and making responsible management decisions iii. hiring qualified experts iv. monitoring the quality of services and products v. collecting client feedback vi. sharing financial and investment knowledge	No current financial effects. The Group is unable to estimate the financial impact of the opportunity.	Own operations Downstream

Consumers and end-users

An opportunity to attract new clients, improve XTB Group's image and build a competitive advantage by enhancing investment products with ESG solutions. Activating clients by combining investment activities with charitable and social activities.

The opportunity does not stem from XTB's strategy and business model.

No influence on strategy and business model. The possible impact of risk on value chain stakeholders and organisational decision-making.

- i. Sustainalytics rating: Morning Star
- ii. plans for implementation of the ESG website
- iii. activities of the XTB Foundation

No current financial effects. The Group is unable to estimate the financial effects of the risks.

Own operations
Downstream



Table 7. Material management opportunities and risks

Topic identified in the materiality assessment	Description of material risk/opportunity	Relation with the strategy and business model	Current and anticipated effects	Risk/opportunity management	Current and anticipated financial effects	Location where the risk/opportunity arises
Business conduct	Risk of abuse related to the possibility of occurrence of corruption cases in the XTB Group.	The risk does not arise from XTB's strategy and business model.	No impact of risk on strategy, business model. Possible impact on the value chain and decision-making process.	i. Internal regulations on corruption; ii. implementation of Anti-Corruption Policy; iii. building a responsible organizational culture based on values and good practices.	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations
Business conduct	Security risk due to the possibility of leakage of personal data of XTB Group stakeholders of which it is the controller as a consequence of a cybercrime, human error or system error.	The risk does not arise from XTB's strategy and business model.	No impact of risk on strategy, business model and decision-making. Possible impact on value chain stakeholders.	i. network and data security and sealing in place; ii. breach notification procedure; iii. internal awareness campaigns; vi. GDPR compliant activities.	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations
Business conduct	Legal and reporting risks arising from the failure to adapt XTB Group's processes to the highly volatile legislative environment, regulator decisions on environmental, social and governance activities, the lack of knowledge of ESG practices and ethics among XTB Group's partners, and the failure to properly fulfil reporting obligations.	The risk does not arise from XTB's strategy and business model.	No impact of risk on strategy, business model. Possible impact on the value chain and the decision-making process.	i. carrying out Double Materiality Assessment; ii. adapting reporting to EU ESRS standards; iii. keeping abreast of regulations and changes in legislation; iv. selecting partners of good repute; v. assessing partners in ongoing business relationships.	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations
Business conduct	Operational risk as a result of various types of litigation and proceedings before supervisory authorities, e.g.: related to data leakage and breaches of personal data protection, audits and potential penalties imposed by the FSA, UOKIK, negative outcome of court proceedings.	The risk does not arise from XTB's strategy and business model.	No impact of risk on strategy, business model, value chain and decision-making process.	i. data safeguards in place; ii. operations in compliance with laws and good practices; iii. transparent communication with the supervisor; iv. timeliness in meeting obligations.	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations

Business conduct	Product (client complaints) and reputation risks related to the specific nature of the investment products offered by XTB, their negative reputation in the market (e.g. leveraged financial instruments) and negative comments in forums and on the web, due to the high investment risk and the high probability of client loss they entail.	Risks arising from the characteristics of XTB S.A.'s investment products which are part of the Company's business model.	No impact of risk on strategy, business model and decision-making. Possible impact on value chain stakeholders.	i. provision of information material; ii. refined, transparent client documents; iii. MiFID survey determining the appropriateness of services to clients' knowledge, experience and preferences and their risk appetite.	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations Downstream
Business conduct	An opportunity to improve the quality of management processes, increase the flexibility and resilience of XTB Group's operations through effective management of the ESG area, management of risks and opportunities, implementation of internal policies and procedures.	Opportunity arising from the ESG Strategy.	No impact on strategy, business model and value chain. Possible impact on decision-making.	i. ESG strategy ii. creation of an ESG Team iii. empowerment of ESG governance at the Management Board level iv. double materiality assessment vs. preparation for reporting under the CSRD	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations
Business conduct	An opportunity to improve the sustainability reporting process by monitoring and adapting it to ongoing legal changes and implementing best reporting practices.	The opportunity does not arise from XTB's strategy and business model.	No influence on strategy, business model, value chain and decision-making.	i. preparation for reporting under the CSRD ii. cooperation with ESG area advisors iii. double materiality assessment	No current financial effects. The Group is unable to estimate the financial effects of the risks.	Own operations

Business conduct

Opportunity for increased investor interest and access to preferential insurance terms as a result of proper management of the ESG area.

The opportunity does not arise from XTB's strategy and business model.

Lack of impact on strategy, business model and decision-making process. Possible impact on the value chain.

- i. ESG strategy
- ii. Risk of abuse related to the possibility of occurrence of corruption cases in the XTB Group.
- planned implementation of ESG website
- iii. ESG area activities and initiatives
- iv. sustainability reporting

No current financial effects. The Group is unable to estimate the financial effects of the risks.

Own operations

Business conduct

An opportunity to increase the efficiency, quality of XTB's services and products by building a valuable, diverse organisational culture based on respect and ethical values.

The opportunity stems from the assumptions made within the ESG Strategy.

Lack of impact on strategy, business model, value chain and decision-making process.

- i. creation of diverse project teams
- ii. creation of spaces to share knowledge and passions of employees
- iii. HR procedures and policies
- iv. activities and initiatives undertaken
- v. implementation of the ESG strategy
- vi. signing of the Diversity Charter
- vii. training in the DEI area

No current financial effects. The Group is unable to estimate the financial impact of the opportunity.

Own operations



1.7. ESRs compliance tables

IRO-2 Table 8. List of disclosure requirements met when preparing a sustainability statement following a materiality assessment

Disclosure no.	Name of disclosure	Chapter Statements
ESRS 2:	General disclosure	
BP-1	General basis for making sustainability statements	1.1.
BP-2	Disclosure in relation to special circumstances	1.1.
GOV-1	The role of the administrative, management and supervisory bodies	1.2. , 4.2.1.
GOV-2	Information provided to the entity's administrative, management and supervisory bodies and the sustainability issues they undertake	1.3.
GOV-3	Mainstreaming sustainability-related outcomes into incentive schemes.	1.3.
GOV-4	Due diligence statement	4.6.
GOV-5	Risk management and internal controls over sustainability reporting	4.5.
SBM-1	Strategy, business model and value chain	1.4. , 2.1.
SBM-2	Stakeholder interests and opinions	1.5. , 3.2.
SBM-3	Material impacts, risks and opportunities and their interrelationship with the strategy and the business model	1.6., 3.1. , 3.2.
IRO-1	Description of processes to identify and assess material impacts, material risks and material opportunities	1.6.
IRO-2	ESRS disclosure requirements covered by the entity's sustainability statement	1.7.
ESRS E1:	Climate change	
E1-1	Transformation plan for climate change mitigation	2.1.
E1-2	Policies related to climate change mitigation and adaptation	2.1.1.
E1-3	Action and resources in relation to climate policy	2.1.1.
E1-4	Climate change mitigation and adaptation objectives	2.1.3.
E1-5	Energy consumption and energy mix	2.1.2.
E1-6	Gross Scope 1, 2 and 3 greenhouse gas emissions and total greenhouse gas emissions	2.1.3.
E1-7	Greenhouse gas removal and reduction of greenhouse gas emissions projects financed through carbon credits	2.1.3.
E1-8	Internal setting of greenhouse gas emission charges	2.1.3.
E1-9	Anticipated financial effects from material physical risks and risks of	2.1.3.

transition and potential climate-related opportunities

ESRS E2: Pollution

IRO-1	Description of processes for identifying and assessing significant impacts, significant risks and significant opportunities	1.6.
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ESRS E3: Water and marine resources

IRO-1	Description of processes for identifying and assessing significant impacts, significant risks and significant opportunities	1.6.
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ESRS E4: Biodiversity and ecosystems

IRO-1	Description of processes for identifying and assessing significant impacts, significant risks and significant opportunities	1.6.
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ESRS E5: Resource use and the circular economy

IRO-1	Description of processes for identifying and assessing significant impacts, significant risks and significant opportunities	1.6.
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ESRS S1: Own workforce

S1-1	Policies related to own workforce	3.1.5
S1-2	Procedures for working with own employees and employee representatives on impacts	3.1.5, 3.1.7.
S1-3	Processes for levelling negative influences and channels for reporting problems by unit staff	3.1.7.
S1-4	Taking action on the significant impacts on own workforce and applying approaches to mitigate material risks and opportunities associated with own workforce, and the effectiveness of these actions	3.1.7.
S1-5	Objectives for managing material negative impacts, enhancing positive impacts and managing material risks and material opportunities	3.1.7.
S1-6	Characteristics of the unit's employees	3.1.1
S1-7	Characteristics of non-employees who are the entity's own employees	3.1.1
S1-8	Scope of collective bargaining and social dialogue	3.1.7.
S1-9	Diversity indicators	3.1.2
S1-10	Adequate wages	3.1.3
S1-11	Social protection	3.1.6.
S1-13	Training and skills development indicators	3.1.4.

S1-15	Work-life balance indicators	3.1.6.
S1-16	Wage indicators (wage gap and total wages)	3.1.3
S1-17	Incidents, complaints and serious impacts regarding human rights	3.1.7.

ESRS S4: Consumers and end-users

S4-1	Policies related to consumers and end-users	3.2.2, 3.2.3.
S4-2	Collaborative influencing processes with consumers and end-users	3.2.1.
S4-3	Remediation processes for negative impacts and channels for consumers and end-users to report problems	3.2.3.
S4-4	Taking action on material impacts on consumers and end-users and applying approaches to manage material risks and opportunities related to consumers and end-users, and the effectiveness of these actions	3.2.1.
S4-5	Objectives for managing material negative impacts, enhancing positive impacts and managing material risks and material opportunities	3.2.1.

ESRS G1: Governance

GOV-1	The role of the administrative, supervisory and management bodies	4.2.1.
G1-1	Corporate Culture and Business Conduct Policies	4.3.
G1-2	Supplier relationship management	4.5.
G1-3	Prevention and detection of corruption and bribery	4.3.
G1-4	Confirmed incident of corruption or bribery	4.3.
G1-6	Payment practices	4.5.

Table 9. List of data points included in cross-cutting standards and thematic standards that stem from other EU legislation as per Appendix B

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		1.2., 4.2.1.
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		4.2.2.
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				4.6.
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453(6) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Non-material
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Non-material
ESRS 2 SBM-1 Involvement in activities related to controversial	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818(7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Non-material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
weapons paragraph 40 (d) iii					
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Non-material
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	2.1.
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		2.1.
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		2.1.3.
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				2.1.2.

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
climate impact sectors) paragraph 38					
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				2.1.2.
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				2.1.2.
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		2.1.3.
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		2.1.3.
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	2.1.3.
ESRS E1-9 Exposure of the			Delegated Regulation (EU) 2020/1818, Annex II		2.1.3.

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1816, Annex II		
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			2.1.3.
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			N/A
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		N/A
ESRS E2-4 Amount of each pollutant listed	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator				Non-material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Non-material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Non-material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Non-material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Non-material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Non-material
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Non-material
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Non-material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Non-material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Non-material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Non-material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Non-material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Non-material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Non-material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Non-material
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Non-material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				3.1.5.
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		3.1.5.
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Non-material
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Non-material
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				3.1.7.
ESRS S1-14 Number of fatalities and number and rate of work- related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Non-material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Non-material
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		3.1.3.
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				3.1.3.
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		3.1.7.
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Non-material
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Non-material
ESRS S2-1	Indicator number 11 and n. 4 Table #3 of Annex 1				Non-material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
Policies related to value chain workers paragraph 18					
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Non-material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Non-material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Non-material
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Non-material
ESRS S3-1 non-respect of UNGPs	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Non-material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17			Delegated Regulation (EU) 2020/1818, Art 12 (1)		
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Non-material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				3.2.2, 3.2.3.
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		3.2.2
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				3.2.1.
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				4.3.
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				4.3.

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		4.3.
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				4.3.

Table 10. List of references

No	ESRS requirement	ESRS data point	Document referred to
1.	GOV-1 The role of the administrative, management and supervisory bodies	GOV-1 20b GOV-1 21c	<i>Management Report of XTB Group and XTB S.A. in 2024, chapter: Governance</i>



2. Environment

2.1 Climate change

2.1.1. The XTB Group's Climate Policy

2.1.2. Fuel and energy consumption

2.1.3. Greenhouse gas emissions

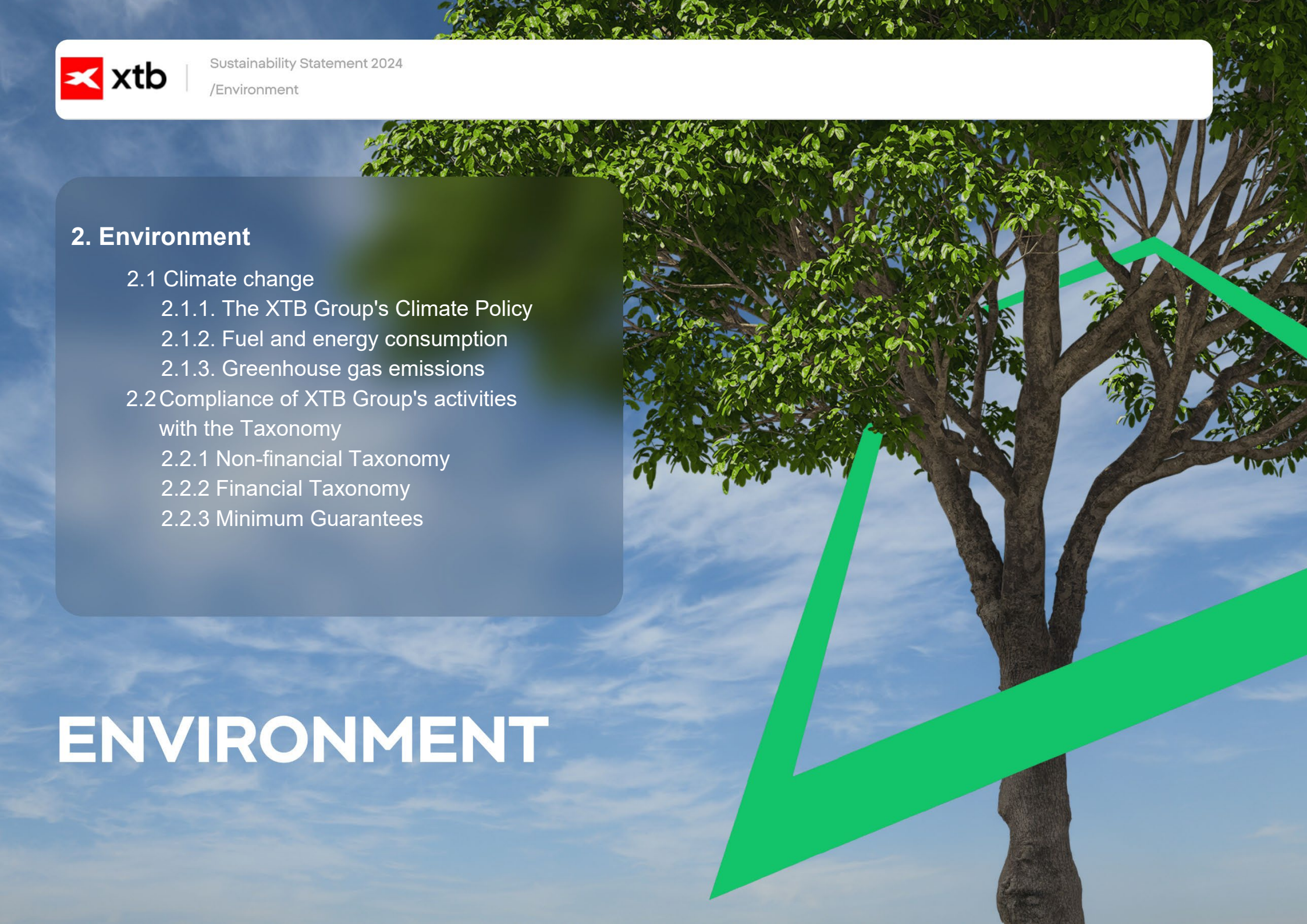
2.2 Compliance of XTB Group's activities with the Taxonomy

2.2.1 Non-financial Taxonomy

2.2.2 Financial Taxonomy

2.2.3 Minimum Guarantees

ENVIRONMENT



2. Environment

2.1. Climate change

The XTB Group's core business, based mainly on the operation of IT infrastructure (including servers) and office operations, means that we do not identify any significant impact of our activities on the environment or climate change. Due to the non-production nature of our business, there is no demand for and consumption of raw materials and materials. In providing our services, we use IT infrastructure, office supplies and electricity, which is essential for the continuity of our operations.

To date, we have not taken climate issues into account in XTB Group's decision-making processes, and climate considerations are not included in the remuneration of members of the administrative, management and supervisory bodies. Nevertheless, it is our intention to reduce our impact on the environment (including climate change).

E1-1 In July 2024, the XTB Group published its ESG Strategy 2024-2027, where we identified one of the key targets for calculating the Group's full carbon footprint in scopes 1, 2 and 3. This is our next step, which will enable the development of a decarbonisation plan with measurable greenhouse gas reduction targets in Scopes 1, 2 and 3 in the coming years, and will support our move towards net zero emissions by 2050 in accordance with the Paris Agreement. As this is a new area of interest for the XTB Group, we have not yet developed a transformation plan for climate change mitigation purposes, but over the next 5 years we will analyse the feasibility of developing and implementing one after developing a decarbonisation plan.

E1 GOV-3 In 2024 no financial incentives related to the area of environment and climate were applied to members of the Management Board of XTB S.A. and the Supervisory Board of XTB. Due to the lack of greenhouse gas emission reduction targets, the activities of the above-mentioned bodies in this area were not assessed either.

2.1.1. XTB Group's Climate Policy

E1-3 / MDR-A Action and resources in relation to climate policy

We are at the beginning of our journey towards decarbonisation and climate change is a new area of focus. In 2024, we have taken steps to develop a climate issue management system in line with the updated ESG Strategy for 2024-2027 that would support us in reducing our impact on climate change, i.e. identification of climate and environmental risks, scenario analysis, creation of Climate Policy. These activities had a scope consistent with the geographical scope of the XTB Group's operations. The next stage will be the management of identified risks within the XTB Group's location and monitoring the XTB Group's impact on the environment and climate using data collected for the purposes of sustainable development reporting.

We are an investment company and our core business can be categorized as a typical office and administrative business. XTB's operational processes, key for business continuity, service and product development are based on maintaining the necessary IT infrastructure. Accordingly, the most significant identified areas of the Group's climate and environmental impact are the consumption of purchased electricity and the management of electro-waste. Consequently, our direct activities generate limited and indirect climate and environmental impacts relative to highly energy-intensive industries.

As part of its double materiality assessment, the organisation identified energy efficiency measures, i.e., seeking to replace servers with less energy-intensive ones at the end of the life cycle of existing equipment, locating XTB S.A.'s headquarters in a certified building, locating selected offices of foreign units in more energy-efficient buildings, among others. During the reporting period, the XTB Group did not use decarbonization levers, but in the future it will consider taking actions based on decarbonization levers depending on identified needs and available possibilities.

E1-2 / MDR-P

Understanding the need to address progressive climate change, despite our limited influence in the area, in 2024 we undertook a process of identifying climate opportunities and risks and developing a Climate Policy and scenario analysis. We believe that these steps will allow us to systematise our activities and set the perspective for the further development of the impact XTB has on the climate change. Risks have been aligned to and will be implemented in the internal Risk Management System. No policies related to climate change mitigation and adaptation other than the Climate Policy apply in the XTB Group. Its guidelines are intended to improve the management of the Group's climate change impact and to support XTB Group's operational processes and activities. As part of the work on the Policy, we carried out a scenario analysis in cooperation with an external expert (taking into account the two extreme scenarios that are part of the document), which is intended to form the basis for future decisions on the Group's climate adaptation measures.

The analysis took into account 3 time perspectives:

- **short-term** - in which the time horizon was assumed to be 2027 (the assumed year of implementation of the ESG strategy adopted by XTB);
- **medium-term** - in which the time horizon was assumed to be 2030 (an intermediate year in the implementation of the assumptions of the European Union Climate Policy)
- **long-term** - in which the time horizon was assumed to be 2050 (the year in which according to the assumptions of the EU Climate Policy and the Paris Agreement, climate neutrality, i.e. zero net emissions, will be achieved).

The analysis was carried out based on the TCFD Guidelines (Guidance on Scenario Analysis for Non-Financial Companies) and the IPCC RCP and SSP scenarios.

ESG Team is responsible for implementation of the Policy. The policy was adopted by a Resolution of the Management Board of XTB S.A. in December 2024. The XTB Group's ability to implement climate change mitigation and adaptation measures depends solely on the availability of energy (including renewable energy). In 2024, the XTB Head Office has covered 100% of its electricity consumption with renewable energy sources (wind power). In 2024, the XTB Group did not incur any significant capital and operating expenditure required to implement the activities undertaken.

Table 11. XTB Group projects completed in 2024

Project	Implementation status
An update of the "Natural Investment" in-house educational programme	Completed in 2024
Double Materiality Assessment of areas E, S, G	Completed in 2024
Carrying out an analysis of climate opportunities and risks	Completed in 2024
Reporting of greenhouse gas emissions under the GHG Protocol Corporate Accounting and Reporting Standard in scope 1, scope 2 and scope 3	Started in 2024
ESG Strategy Update 2024-2027	Completed in 2024
Scenario analysis of the resilience of the business model and the Group's strategy to climate change assuming an increase in average global temperatures of less than 2°C and more than 2°C compared to the pre-industrial period	Completed in 2024
Implementation of the XTB Group Climate Policy	Completed in 2024

In 2024, we have identified a list of topics relevant to climate change and the environment and identified a key climate opportunity and risk as part of our Double Materiality Assessment. The project involved an in-depth dialogue with representatives of the Group's subsidiaries and a series of workshops were held within the XTB Company operating in Poland to explore potential or actual climate and environmental impacts.

SBM-1 / SBM-3

In the course of our work, we identified one key physical risk in the climate area from the point of view of the double materiality assessment, defined as "External event risk (business continuity risk) due to the possibility of sudden extreme weather events at the locations of some XTB Group companies and branches." It's physical climate risk related to the possibility of extreme and unforeseen weather events that may affect XTB offices located in locations, particularly at risk of being impacted. We identify that XTB's assets and business are not materially at risk by virtue of not having significant IT assets or infrastructure at the identified locations, but due to the fact that employees are employed at these locations, we have decided to consider this risk to be material. We identify that the physical risk identified do not and will not materially affect XTB Group's strategy and business model of XTB Group. During the reporting period, no critical assumptions were identified regarding the impact of the transition to a low-carbon economy on macroeconomic trends, energy consumption, the energy mix and on assumptions about technology deployment.

The objectives of the Climate Policy are to guide the Group's efforts to:

- 1) mitigate and adapt to the climate change;
- 2) achieve the objectives set out in the XTB Group's ESG Strategy for 2024-2027;
- 3) achieve the climate neutrality by XTB Group's in the future.

E1-1 The objectives of the Policy will be implemented through actions focused on:

- 1) calculation of the Group's carbon footprint in all three scopes;
- 2) identification of the opportunities to reduce/compensate for the Group's carbon footprint;
- 3) cyclical reviews of climate and environmental opportunities and risks and time scenarios as recommended by the Task Force on Climate-related Financial Disclosures (TCFD);
- 4) integration of climate and environmental risks into the climate change risk management system;
- 5) exploiting the opportunities and possible positive effects of climate change.

Climate commitments

- 1) From 2024 onwards, the XTB Group plans to calculate and monitor its carbon footprint annually in all three scopes.
- 2) The XTB Group has the ambition to strive for climate neutrality understood as net zero emissions in scopes 1, 2 and 3 according to the GHG Protocol standard.
- 3) The Group will improve the data collection processes for calculating the carbon footprint and aim to cover as wide a range of emissions as possible in the analysis.

E1-2 / MDR-P The Climate Policy covers the entire XTB Group. The geographical areas adopted in the Policy are the Group's area of operations - specific office locations subjected to scenario analysis. The addressees of the Policy are external and internal stakeholders: clients, employees, media representatives, capital market representatives, representatives of our social environment and the regulatory and market environment. The XTB Group Climate Policy is a publicly available document adopted by a Resolution of the XTB S.A. Management Board and known to XTB Group employees. ESG Team is responsible for its implementation. We also encourage XTB's business partners to support the Policy's objectives and to set their own climate targets and solutions within their business.

Due to the lack of measurable goals of the XTB Group Climate Policy, we intend to monitor its effectiveness through an annual review of the document and the effectiveness of the actions declared therein, also in relation to significant impacts, risks and opportunities in the area of the environment and climate. The ESG Team is responsible for the above analysis, which, in cooperation with the employees of the XTB Group, will support the XTB Group's pursuit of the goal of developing the area of climate and environmental management. Over time, when it is possible to set greenhouse gas emission reduction targets, they will become one of the indicators measuring the level of effectiveness of the Policy.

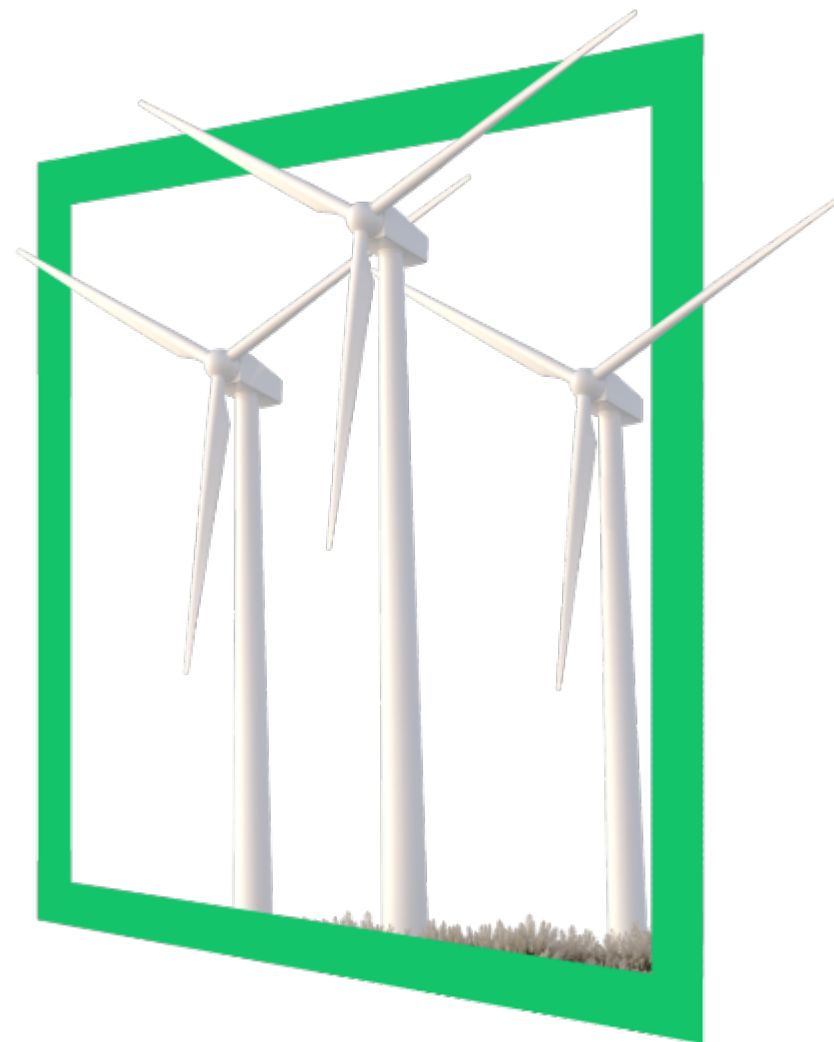


E1-2 MDR-P / E1-3 MDR-A

In order to implement the commitments, we take or intend to take actions such as:

- XTB Group's annual greenhouse gas emissions calculation.
- Setting emission reduction targets based on XTB Group's accumulated GHG emissions data from several periods.
- Initiatives to support our drive to reduce our carbon footprint in scopes 1, 2 and 3.
- Analysis of the need for a transition plan in relation to the administrative and office nature of XTB Group's business.
- Annual climate risk review.
- Deepening of the dialogue on reducing the negative climate impact in the value chain (upstream and downstream), in particular with stakeholders responsible for key Scope 3 emissions, in order to implement real changes leading to CO2 reductions.
- Strengthening awareness of climate change within the organisation through, among other things, the "Natural Investment" programme.
- Responsible management of equipment and waste (including waste segregation, extending the life of electronic equipment through repair, reuse of equipment) and control of resource consumption at all sites.
- Using renewable energy and gradually increasing its share in the Group's energy mix as far as feasibility and solution availability allow.
- Increasing the Group's energy efficiency, including by replacing servers with newer, less energy-intensive ones; locating XTB offices in more energy-efficient buildings (e.g. XTB Head Office in Warsaw).

The above activities are elements of the XTB Group's development process in the area of Environment and Climate. They will be implemented either continuously or over a 5-year period (including setting emission reduction targets).



2.1.2. Fuel and energy consumption

E1-5 MDR-M

The sources of direct fuel consumption in the XTB Group are limited to a small number of company cars and generators. However, XTB S.A. Group's core administrative and office operations and IT infrastructure are responsible for the most significant electricity and heat consumption. The measurement of the indicator related to energy consumption and energy mix was not verified by any external entity other than the advisor in cooperation with whom we carried out the calculations. In the absence of data, estimates were made based on actual data from other companies with a similar location (geographical location) and similar parameters (heat energy included/not included in electricity). In the further part of the chapter there is as information on the direct consumption of electricity, heat and fuel consumption in the XTB S.A. Group is given below.

XTB Group does not operate and does not generate revenues from activities in sectors with a significant climate impact and therefore does not show sectors with a high climate impact in the Statement.



Table 12. XTB Group energy mix

Reporting period 01.01.2024 – 31.12.2024	Unit	Consumption
Fossil energy consumption	MWh	1 494
Energy consumption from nuclear sources	MWh	0
Percentage of fossil sources in total energy consumption	%	86
Percentage of energy consumption from nuclear sources in total energy consumption	%	0
Renewable energy consumption, including:	MWh	248
Consumption of fuel from renewable sources (biomass, industrial and municipal waste of biological origin, biofuels, biogas, hydrogen from renewable sources, etc.)	MWh	0
Consumption of purchased electricity, heat, steam and cooling from renewable sources	MWh	248
Consumption of self-generated renewable energy without fuel	MWh	0
Share of energy from renewable sources in the total energy consumption	%	14
Total energy consumption related to own operations	MWh	1 742

XTB Group's Scope 1 Biogenic Emissions

Biogenic emissions are emissions outside the Scopes resulting from the combustion of biocomponent added to fuels commonly available at service stations and used in vehicles owned or controlled by the company.

Tabela 13. Biogenic emissions of XTB Group in 2024

Company	Unit	Biogenic emissions
XTB S.A. HQ	t CO2e/ year	0,28
Branches of XTB S.A.	t CO2e /year	0,72
Other companies of XTB S.A.	t CO2e/year	0,00
TOTAL	t CO2e/year	1,00

Scope 2 Biogenic Emissions

Biogenic emissions occur due to the combustion of biomass during energy production. Since national institutions do not provide information on the fuel mix, in particular the percentage of biomass burned in total energy production, it is not possible to calculate biogenic emissions in Scope 2.

Scope 3 Biogenic Emissions

Biogenic emissions may occur in transport, i.e. they may concern categories 4, 6, 7 and 9 of Scope 3. It is not possible to separate these emissions because the exact value of fuel consumption and its biocomponent content is not known. Emissions in these categories are calculated per km or pkm (passenger.km), not per litre of fuel consumed, because such data is unavailable. Additionally, biogenic emissions may occur in categories 1 and 2 of Scope 3 for individual purchased products, services and capital goods, but we do not have information about these emissions from suppliers.

XTB Group energy basket

The year 2024 for the XTB Group's energy mix disclosures is the base year. In the reporting period, all electricity used within the scope of the XTB Headquarters operations came from renewable energy sources, which was confirmed by guarantees of origin of energy. In the Headquarters (Skyliner office building in Warsaw), the energy used by XTB within the scope of the leased area can be considered as coming from renewable sources in proportion to the energy used in the entire building. The share of consumption of externally purchased electricity from renewable sources (wind energy) confirmed by a certificate of guarantee of origin and approved by the Polish Power Exchange is approx. 16% in the total consumption of externally purchased energy of the XTB S.A. Capital Group. In addition, the energy consumption in the building is reduced by the energy-saving LED lighting used in the building.

In an effort to reduce electricity consumption and greenhouse gas emissions, we have been gradually phasing out older, energy-intensive servers and replacing them with new, more energy-efficient servers from certified EU suppliers. In addition to increased energy efficiency, they are also characterised by state-of-the-art solutions such as the smart adjustment of energy consumption in relation to load, which also translates into electricity savings.

2.1.3. Greenhouse gas emissions

E1-4 / MDR-T

In 2024, we have for the first time undertaken a full-scale calculation of greenhouse gas emissions and therefore do not identify changes from previous reporting periods, we didn't reduce emissions and have not set reduction targets.

Limits of reported emissions:

- Data includes XTB S.A., its branches and subsidiaries according to operational and financial control (100% of the issue of each entity).

Scope of reported emissions:

- **Scope 1** – direct emissions from the combustion of fuels in stationary or mobile sources owned or controlled by the company, technological process emissions or refrigerant leaks.
- **Scope 2** – indirect greenhouse gas emissions from the consumption of imported (purchased or externally supplied) electricity and heat – district heating. In practice, greenhouse gas emissions are created at the point of production of these utilities.
- **Scope 3** – other indirect emissions arising along the value chain.

Data on the consumption of electricity and heat (district heating), solid fuels, purchased goods and services, transport, waste came mainly from internal registers of the XTB Group. The calculations were developed using recognized international standards and best practices for calculating the company's carbon footprint based on operational data. The calculation model was subject to additional verification in accordance with the internal quality control procedures of the external advisor to the XTB Group for calculating greenhouse gas emissions. The assumptions used by the advisor, in particular regarding electricity consumption, solid fuels, purchases, transport, waste and employee commuting to work, were verified by members of the XTB S.A. project team.

The XTB Group's carbon footprint calculations were carried out in cooperation with an external expert and included:

- **education** - an online educational workshop for all interested employees and a workshop for the project team;
- **identification of emission sources** - an analysis of the XTB Group's business model and business profile was performed, identifying all processes that could generate greenhouse gas emissions. A process map was created, which included all possible emission sources divided into Scopes and categories of Scope 3;
- **data collection and verification** - collection of data from all organizational units of the XTB Group necessary for carbon footprint calculations using personalized data collection templates and verification;
- **carbon footprint calculations** - creation of a tool adapted to the XTB Group's operations, collection of appropriate emission indicators and double verification of calculations.

Table 14. Sources of emission factors used to calculate XTB's carbon footprint in 2024

Source	Link	Comment
B. Urban, K. Roth, 2019, Residential Consumer Electronics Energy Consumption in the United States in 2017 (last access: 07.02.2025 r.)	Residential Consumer Electronics Energy Consumption in the United States in 2017	Average power consumption by: -laptop, -computer, -screen -smart TV
Department for Environment Food & Rural Affairs (DEFRA) – United Kingdom: Greenhouse gas reporting: conversion factors 2024 (last access: 21.02.2025 r.)	DEFRA 2024	*Emission factors for fuels burned in stationary sources for the UK *Emission factors for fuels burned in mobile sources *Emission factor for waste water *WTT emission factors for fuels *Emission factors for waste *Direct emission factors and WTT for individual means of transport *Conversion factors for individual fuels Supplier emission factor for electricity produced
E.ON Polska S.A., 2024, fuels structure in 2023	https://eon.pl/-/media/Eon/Dokumenty/La-nding-pages/ekologicznie-i-oszczednie/Struktura_paliw_2023.ashx	Supplier emission factor for electricity produced
Ecoact, 2020, Homeworking emissions Whitepaper	Homeworking emissions	Average electricity consumption per lamp
EDF, 2024, Emissions index of electricity produced in 2023	https://www.edf.fr/en/the-edf-group/producing-a-climate-friendly-energy	Supplier emission factor for electricity produced
EDP Comercial, 2024, Emissions index of electricity produced in 2024	https://www.edp.pt/origem-energia/?sector=17026&year=2023&trimester=2	Supplier emission factor for electricity produced
Ember, 2024, Emissions of electricity produced 2022-2023	Ember 2024	National emission indicators for electricity produced
Enerdata 2024, (last access: 07.02.2025 r.)	Enerdata	Value of transmission losses for countries other than Poland
Exchange-rates.org, 2024, World currency exchange rates and currency exchange rate history (last access: 21.02.2025 r.)	https://www.exchange-rates.org/	Average monthly exchange rates
Exiobase, 2022	exiobase	Expenditure indicators for purchased goods, services, capital goods and business trips
FEDENE Réseaux de chaleur & froid, 2023, Enquete des reseaux de chaleur et froid EDITION 2024	Enquete des reseaux de chaleur et froid EDITION 2023	Location-based emission factor, WTT and percentage of transmission losses for district heating in France
Globales Emissions-Modell integrierter Systeme (GEMIS) v.5.1, March 2023 (last access: 07.02.2025)	GEMIS 5.1 v. 03.2024	* Emission factors for fuels burned in stationary sources for Germany *Direct and indirect emission factor for district heating
Hotel Sustainability Benchmarking Index 2024 (last access: 21.02.2025)	https://greenview.sg/services/chsb-index/	Emissions factors for business travel accommodation
https://m9v7b6.a2cdn1.secureserver.net/wp-content/uploads/2019/12/SDS-	https://m9v7b6.a2cdn1.secureserver.net/wp-content/uploads/2019/12/SDS-	Composition of R410A refrigerant

R410A.pdf?time=1689191439 (last access: 07.02.2025)	R410A.pdf?time=1689191439		https://www.gea.com/pl/articles/natural-refrigerants/natural-refrigerants-hydrocarbons.jsp (last access: 07.02.2025)	https://www.gea.com/pl/articles/natural-refrigerants/natural-refrigerants-hydrocarbons.jsp	Composition of refrigerant R600A (Isobutane)
IEA, 2024, Life Cycle Upstream Emission Factors (Pilot Edition)	IEA 2024, Life Cycle Upstream Emission Factors (Pilot Edition). Total upstream factors for Poland, 2022 estimated	WTT emission factors for electricity			
IPCC AR6, 2023, The Earth's Energy Budget, Climate Feedbacks and Climate Sensitivity Supplementary Material	IPCC AR6 The Earth's Energy Budget, Climate Feedbacks and Climate Sensitivity Supplementary Material	GWP values for individual greenhouse gases			
IPCC, 2006, Guidelines for National Greenhouse Gas Inventories, Chapter 2 Stationary Combustion	2006 IPCC Guidelines for National Greenhouse Gas Inventories, TABLE 2.4 DEFAULT EMISSION FACTORS FOR STATIONARY COMBUSTION IN THE COMMERCIAL/INSTITUTIONAL CATEGORY	Default CH4 and N2O emission factors for natural gas			
Apple Device EPD Cards (last access: 21.02.2025)	Apple environment	*Cradle-to-gate emission factor of purchased equipment *Emission factors in the disposal phase for a given type of equipment			
DELL Device EPD Cards (last access: 21.02.2025)	DELL product carbon footprints	*Cradle-to-gate emission factor of purchased equipment *Emission factors in the disposal phase for a given type of equipment			
Google Device EPD Cards (last access: 21.02.2025)	https://sustainability.google/reports/	*Cradle-to-gate emission factor of purchased equipment *Emission factors in the disposal phase for a given type of equipment			
Lenovo Device EPD Cards (last access: 21.02.2025)	Lenovo eco-declaration	*Cradle-to-gate emission factor of purchased equipment *Emission factors in the disposal phase for a given type of equipment			
Samsung Device EPD Cards (last access: 21.02.2025)	Samsung sustainability	*Cradle-to-gate emission factor of purchased equipment *Emission factors in the disposal phase for a given type of equipment			
National Centre for Emission Balancing and Management (KOBIZE), 2024, Calorific values (WO) and CO2 emission factors (WE) in 2022 for reporting under the Emissions Trading Scheme for 2025	https://www.kobize.pl/uploads/materialy/materialy_do_pobrania/monitorowanie_raportowanie_weryfikacja_emisji_w_eu_ets/wo_i_we_do_monitorowania-ETS-2025.pdf	Calorific values (CV) and CO2 emission factors (EC) in 2022 for reporting under the Emissions Trading Scheme for 2025 Warsaw, December 2024			
National Center for Emission Balancing and Management (KOBIZE), 2024, Emission indices of CO2, SO2, NOx, CO and total dust for electricity based on information contained in the National database on greenhouse gas emissions and other substances for 2023	Emissions Index for Electricity	Emission indicators of CO2, SO2, NOx, CO and total dust for electricity based on information contained in the National database on greenhouse gas emissions and other substances for 2023			

M.Weiss, K. C. Cloos, E. Helmers, 2020, Energy efficiency trade-offs in small to large electric vehicles	Energy efficiency trade-offs in small to large electric vehicles	Average power consumption by: -electric car, -electric bike, -electric scooter	Smartest Energy, 2024, Emissions index of electricity produced in 2023	https://www.smartestenergy.com/en_GB/fuel-mix/	Supplier's emission factor for electricity produced
Ministry of Environment, Waters and Forests National Environmental Protection Agency, April 2023, Romania's Greenhouse Gas Inventory 1989-2021, National Inventory	Romania 2023 National Inventory Report (NIR)	Emission factor for fuels burned in stationary sources in Romania	Statcounter	Operating System Market Share Worldwide Statcounter Global Stats	*Global Phone OS Market Share *Global Tablet OS Market Share
National Centre for Emissions Management, Institute of Environmental Protection National Research Institute, 2024, Poland's National inventory report 2024	https://cdr.eionet.europa.eu/pl/eu/govreg/inventory/e_nvzfr5q/NIR_2024_POL.pdf	Emission factor for fuels burned in stationary sources for Poland	Sustainable Web Design, 2024, Estimating Digital Emissions (last access 07.02.2025)	sustainablewebdesign.org	Electricity consumption for data transmission
Naturgy Iberia S.A., 2024, Wskaźnik emisyjności wyprodukowanej energii elektrycznej w 2023 roku	https://www.naturgy.pt/pt/mercado_energetico/rotulagem/rotulagem_naturgy	Supplier's emission factor for electricity produced	The Scottish Environment Protection Agency (SEPA), 2024, Conversion factors for waste	https://www.sepa.org.uk/media/163323/uk-conversion-factors-for-waste.xlsx	Municipal waste density
Netzdienste Rhein-Main (Mainova AG), 2024, Wskaźnik emisyjności wyprodukowanej energii elektrycznej w 2023 roku	https://www.mainova.de/de/stromkennzeichnung-der-mainova-strommix-im-ueberblick	Supplier's emission factor for electricity produced	Umweltbundesamt, 2023, Emissionsbilanz erneuerbarer Energieträger, Bestimmung der vermiedenen Emissionen im Jahr 2023	Emissionsbilanz erneuerbarer Energieträger 2023	Location-based emission factor, WTT and percentage of transmission losses for district heating in Germany
Odbor Emisie A Biopaliva, 15. April 2023, National Inventory Report 2023 Slovak Republic, Submission under the UNFCCC	Slovakia 2023 National Inventory Report (NIR)	Emission factor for fuels burned in stationary sources in Slovakia	Energy Regulatory Office, 2025, Thermal energy in numbers - 2023	2023 - Thermal energy in numbers - Energy Regulatory Office	Thermal energy emission index - Poland's district heating for 2023
PGE Polska Grupa Energetyczna S.A., 2024, Struktura paliw w 2023 roku	https://www.gkpgge.pl/bip/stuktura-paliw	Supplier's emission factor for electricity produced	Vattenfall, 2024, Emissions intensity of electricity produced in 2023	https://www.vattenfall.de/stromkennzeichnung	Supplier emission factor for electricity produced
			VEOLIA ENERGIA WARSZAWA S.A., 2024, fuel structure in 2023	https://www.energiadlawaraszawy.pl/wp-content/uploads/2024/11/Wplyw-na-Srodowisko-2023-1.pdf	Supplier emission factor for produced thermal energy - district heating
			Západoslovenská energetika, a.s., 2024, Emissions index of electricity produced in 2023	https://www.zse.sk/dokumenty/zse-energy-mix-en-version.pdf	Supplier emission factor for electricity produced

According to information provided from the DEFRA database, emission factors for fuels used in cars owned or controlled by the XTB S.A. Capital Group distribute the percentage share of biomass.

Scope 3 of the carbon footprint described in this report included:

- **Category 1: Purchased goods and services**

Issues related to the purchase of goods and services include, but are not limited to: marketing, research, consulting, recruitment, legal, accounting, telecommunications, cleaning, security and maintenance services. In addition, emissions from water consumption, the purchase of paper, magazines, books, subscriptions, software, low-value office equipment and low-value IT equipment were included. The scope of this category results from the accounting principles adopted in the XTB S.A. Capital Group.

- **Category 2: Capital goods**

Issues related to the purchase of capital goods include, but are not limited to, computer equipment such as laptops, desktop computers (PCs), monitors, smartphones, tablets, as well as server room equipment, including devices such as servers and switches. In addition, other electrical appliances and furniture are also affected by these emissions.

- **Category 3: Energy and fuel-related emissions not included in Scope 1 and 2**

- Upstream emissions of purchased fuels (extraction, production and transport of fuels) consumed at stationary and mobile sources owned or controlled by the company.
- Upstream emissions of purchased energy (extraction, production and transport of fuels used to generate electricity and heat – district heating).
- Direct and upstream emissions (extraction, production, transport of fuels used to generate electricity and heat – district heating) resulting from losses associated

with the transmission and distribution (upstream activities and combustion) of electricity and heat – district heating.

- **Category 4: Upstream - transport and distribution**

Emissions resulting from the transport and distribution of products purchased in the first half of the reporting period, in vehicles that are not owned or controlled by the XTB S.A. Group. Postal services and courier services are also included in this category.

- **Category 5: Waste arising from the company's activities**

Emissions resulting from the production of wastewater, municipal waste generated at facilities used by XTB Group S.A. and electro-waste.

- **Category 6: Business travel**

Issues related to business travel and accommodation of XTB S.A. Group employees.

- **Category 7: Employees commuting**

Emissions associated with employee commuting include the use of various modes of transport such as cars, trams, city buses, rail, bicycles and scooters. In addition, emissions generated by remote working are also included.

- **Category 11: Use of products sold**

Emissions associated with end-user use of the app were estimated based on current-year data, without consideration of full lifecycle assumptions. The analysis included the energy consumption of electrical devices (such as phones, tablets, computers and smart TVs) as well as emissions resulting from data transmission when using the app.

Calculation standards used

The GHG Protocol standard was used to calculate the Group's carbon footprint. A Corporate and Reporting Standard, revised edition, March 2004. World Resources Institute and World Business Council for Sustainable Development. (Changes and amendments: Required gases and GWP values, February 2013) and:

- Scope 2: Market-based approach (use of purchased electricity emission factor by rate from energy supplier) and Location-based approach (use of purchased electricity emission factor by national rate) according to the GHG Protocol. Scope 2 Calculation Guidance. An amendment to the GHG Protocol Corporate Standard, 2015. World Resources Institute.
- Scope 3: GHG Protocol. Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Supplement to the GHG Protocol Corporate Accounting and Reporting Standard, 2011. World Resources Institute and World Business Council for Sustainable Development.
- GHG Protocol. Technical Guidance for Calculating Scope 3 Emissions (version 1.0). Supplement to the Corporate Value Chain (Scope 3) Accounting & Reporting Standard, 2013. World Resources Institute and World Business Council for Sustainability.

As part of the XTB Group's carbon footprint calculation, all greenhouse gases listed in the GHG Protocol standard were included, that is:

- Carbon dioxide (CO₂),
- Methane (CH₄),
- Nitrous oxide (N₂O),
- Sulphur hexafluoride (SF₆),
- Perfluorocarbons (PFCs),
- Hydrofluorocarbons (HFCs),
- Nitrogen trifluoride (NF₃).

The relative greenhouse effect values expressed as Global Warming Potential (GWP) per 100 years used for individual greenhouse gases were taken from the Sixth Report of the IPCC (Intergovernmental Panel for Climate Change), as recommended by the GHG Protocol.

The exceptions are:

- For Scope 3 emission factors derived from the DEFRA 2024¹ database, in which the Fifth Report of the Intergovernmental Panel for Climate Change (IPCC) was used.² According to the GHG Protocol standard, which indicates to use the latest published GWP values of the GHGs concerned in the carbon footprint calculations, the emission factors should be recalculated according to the values given in the Sixth Report of the Intergovernmental Panel for Climate Change (IPCC). For Scope 3 categories 4, 6, 7 and 9, this is not possible with the assumption of calculating GHG emissions from the entire life cycle of the fuels, as the emission factors from direct combustion are presented by value for the individual GHGs concerned, while the WTT emission factors are only given in the CO₂e units.
- EXIOBASE 2022¹¹³ indicator database, which uses an average GWP value for methane of 27.9. Due to the difficulty of assigning fossil and non-fossil values, it was decided to use an average value such as one given in Table 7.SM.7 of the Sixth Report of the Intergovernmental Panel for Climate Change.

Based on analyses of the Group's operations, its business model, financial materiality, reputational risks, etc., the following Scope 3 categories relating to XTB S.A.'s operations were selected for inclusion in the Group's carbon footprint:

¹ Department for Environment Food & Rural Affairs (DEFRA) – United Kingdom: Greenhouse gas reporting: conversion factors 2024, <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024>.

² IPCC, 2014: Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland, 151 ss.

³ <https://www.exiobase.eu/>

- Category 1 – Purchased materials and services
- Category 2 – Capital goods
- Category 3 – Energy and fuel-related emissions not included in Scope 1 and 2
- Category 4 – Upstream – Transport and distribution
- Category 5 – Waste arising from the company's activities
- Category 6 – Business travel
- Category 7 – Employee commuting
- Category 11 – Use of products sold

Selection of emission factors

The GHG emission factors used in the study, among those commonly available, are characterised by:

- **temporal materiality** – indicators relevant/closest to the period for which the carbon footprint is calculated,
- **geographical materiality** – indicators representative of the area for which the carbon footprint is being calculated,
- **technological materiality** – indicators that take into account the technology used, for which the carbon footprint is calculated.

These coefficients come from recognised, peer-reviewed, officially published sources:

- national and international research centres,
- sector associations,
- centres responsible for regulation, monitoring and statistics in relevant areas.

This approach is in line with the provisions of the GHG Protocol methodologies⁴. Following the principle of temporal relevance, the emission factors used (within availability) are valid for the reporting period, in this case 2024. Where factors have not been published for a particular reporting year, the latest available emission factors have been used.

Emissions calculated based on primary data represent 1.01% of total Scope 3 emissions.

When calculating the carbon footprint of the XTB S.A. Capital Group, the following assumptions and/or exclusions were made:

Scope 1

- **Stationary combustion (fuel consumption in emergency power generators and fuel consumption for heating buildings):**
 - In one XTB location, the fuel consumption in emergency power generators was provided, which applies to the entire building, not the area rented by the company. Due to the lack of information on the percentage of space rented by XTB S.A. in relation to the total area of the building, it was decided that emissions from this XTB S.A. location will be calculated based on whole building consumption.
 - In one of the XTB S.A. locations, fuel consumption in emergency power generators for the entire year 2023 was given with the information that data for 2024 would be available at the end of 2025. In connection with the above, the consumption for 2024 was estimated taking the value for the entire year 2023.

⁴ GHG Protocol: A Corporate Accounting and Reporting Standard

- In one of the branches of XTB S.A., the consumption of natural gas for heating purposes in the building was estimated based on data on the percentage share of space rented by the company in comparison to the area of the entire building.

▪ **Mobile combustion:**

- Most XTB branches do not have vehicles in their car fleet.
- In some branches, fuel consumption in private passenger cars for business trips was provided. Therefore, it was decided to include emissions from this source in category 6 of Scope 3.

▪ **Refrigerant leaks:**

- In one of XTB S.A.'s locations, the value of refrigerant leakage was estimated based on information on the value of leakage for specific storeys of the building and the percentage ratio of the area rented by the company to its total area.
- At one XTB location, the refrigerant leakage value was reported for the entire building, not the area rented by the company.
- Due to the lack of information on the percentage of space rented by XTB in relation to the total area of the building, it was decided that emissions from this location would be calculated based on the reported refrigerant leakage for the entire building.
- Due to the lack of data in some XTB S.A. locations. on refrigerant leaks, it was decided that emissions from these locations will be excluded from the calculation of the XTB S.A. Group's carbon footprint for 2024.

▪ **Renewable energy production:**

- None of the companies in the XTB S.A. Capital Group have been recorded as having an installation that generates electricity from renewable sources and is owned or controlled by any of the companies in the XTB S.A. Group.

Scope 2

▪ **Electricity:**

- In one of XTB S.A.'s locations, there was a lack of data on the name of the electricity supplier. Therefore, emissions from this location were calculated with the location-based indicator appropriate for this location.
- In the absence of data on electricity consumption, it was estimated either based on information on the climate zone and type of heating, where consumption was calculated based on another company with similar characteristics or estimated based on data for the second half of 2023.
- In the absence of data for part of the reporting period, results from the same period of previous years were extrapolated.
- In the absence of information on the emissions of electricity produced by a given supplier for XTB Group companies, it was decided to use location-based indicators for the given countries.
- Due to the lack of information from both electricity suppliers and national non-CO2 greenhouse gas emission factors, only CO2 emissions were included in the calculations of electricity emissions, both in the market- and location-based approaches.
- The average emission factors for the countries include transmission losses, which according to the GHG Protocol should be included in Scope 3 Category 3. It was not possible to separate out the electricity transmission losses, so they had to be included in the Scope 2 calculations.

- Due to the lack of other information from electricity suppliers, it was assumed that transmission losses are already included in the suppliers' emission factors. Therefore, direct emissions from transmission losses were not included again in Scope 3 Category 3.
- **Thermal energy – district heating:**
 - Due to the lack of data for the consumption of heat energy - district heating for 2024 in some XTB S.A. locations, they were estimated based on data for the consumption of heat energy - district heating based on data from the period 01.06-31.12.2023 or for 2023.
 - In the absence of the name of the district heating supplier, it was decided to use the location-based indicator for countries.
 - Due to the lack of information from both district heating suppliers and in the national indicator for Poland on greenhouse gas emissions other than CO₂ in the calculations of emissions from district heating, both in the market- and location-based approach, only CO₂ emissions were included.
 - The average emission factor for the country includes transmission losses, which according to the GHG Protocol should be included in Category 3 of Scope 3. It was not possible to separate the emissions from district heating transmission losses, so they had to be included in the Scope 2 calculations.
 - In the absence of other information from the district heating supplier, it was assumed that emissions from transmission losses are already included in the supplier's emission factor. Therefore, direct emissions from transmission losses were not included again in Category 3 of Scope 3.

Scope 3

Category 1: Purchased goods and services:

- The calculations were made based on a list of expenditure cost accounts from the accounting settlements provided. Due to the lack of information on the country of origin of the purchased products, the emission indicators were adjusted in accordance with the country of operation of the company/ branch, based on the Exiobase database.
- According to the GHG Protocol standard, data for calculations using the expense-based method should refer to net amounts. On the other hand, XTB S.A. and its subsidiaries, as financial entities providing mainly VAT-exempt services, use the deduction of input VAT according to the structure or do not deduct VAT. As a result, the companies' costs are increased by the part of input VAT that is not deductible. In connection with the above, it was decided that the expense data will refer to various types of amounts.
- All items that do not generate emissions and fees and costs of ongoing maintenance (e.g. rent and utilities - emissions from these sources are included in the calculations of Scopes 1 and 2), business trips (accommodation and transport - included in Category 6), expenses related to the operation of cars (including fuel - included in Scope 1), fixed lump sums and vehicle insurance were excluded from the calculations. The costs of drinking water, municipal sewage (emissions from these sources were calculated based on consumption data) and postal and courier services (included in Category 4) were also excluded.
- In the case of missing or incomplete data regarding water consumption, it was decided to estimate these deficiencies based on data from other XTB S.A. entities or by extrapolation.

- No formal cut-off point was used to exclude expenses. However, for some purchase categories for which no explanation was obtained, a decision was made to exclude them, provided that they accounted for less than 5% of total expenditure.
- Due to the impossibility of separating the amounts related to the transport of purchased materials and products, they were included in this Scope 3 category

Category 2: Capital goods

- Calculations were made based on fixed asset lists prepared by accountants of individual companies/branches. Emissions of almost 47% of fixed assets were calculated based on EPD cards prepared by manufacturers. Emissions of about 25% of fixed assets were calculated using average indicators per device. In turn, the method based on expenditures was used to calculate emissions from the remaining 28%.

Table 15. Distribution of methods used for emission calculations in Scope 3 category 2

Method	Number of fixed assets	% share	Emissions [kg CO2e/year]	% share
EPD Cards	513	47,37%	84 249,22	16,03%
Average rate per device ⁵	269	24,84%	123 069,99	23,41%
Expenditure-based method	301	27,79%	318 361,75	60,56%

⁵ The average rate per device was determined based on the EPDs of other devices belonging to the same category.

According to the GHG Protocol standard, data for calculations using the expense-based method should refer to net amounts. On the other hand, XTB S.A. and XTB S.A. subsidiaries, as financial entities providing mainly VAT-exempt services, use the deduction of input VAT according to the structure or do not deduct VAT. As a result, the companies' costs are increased by the part of input VAT that is not deductible. The same applies to the value of fixed assets. In connection with the above, it was decided that the expense data will refer to various types of amounts.

Category 3: Energy and fuel emissions outside Scope 1 and 2

- Category was calculated using the location-based method⁶
- Electricity:
 - For WTT emissions from transmission losses in Poland, information on the amount of losses from KOBIZE was included.
 - For WTT emissions from transmission losses, information was included on the amount of losses for a given country from Enerdata.
- Thermal Energy – district heating:
 - Due to the lack of information on greenhouse gas emissions other than CO2, only CO2 emissions were assumed in the average indicator for Poland.
 - The WTT (generation) emission factor for district heating was calculated based on the percentage increase in emissions from heat supplied to the network compared to the amount of emissions from heat produced. This percentage was applied accordingly to the average emission factor for district heating in Poland for 2023.

⁶ For more information, see GHG Protocol Scope 2 Guidance, Appendix B

- For WTT emissions from transmission losses for Poland, information on the amount of losses from URE was taken into account.
- For WTT emissions from transmission losses for Germany, information on the amount of losses from Umweltbundesamt was taken into account.
- For WTT emissions from transmission losses for France, information on the amount of losses from FENEDE was taken into account.

Category 4: Upstream – transport and distribution

- This category partly takes into account data provided by companies and data based on cost accounts. Therefore, the amounts given are not net amounts in all cases, as required by the GHG Protocol standard.

Category 5: Waste generated as a result of business activities

- For all branches and companies of XTB S.A., it was assumed that wastewater production is equal to water consumption given in category 1 of Scope 3 of the carbon footprint of the XTB S.A. Capital Group for the year 2024.
- GHG emission factors for the waste disposal method as landfill/landfill include collection, transport and GHG emissions from landfills, while for other disposal methods only transport emissions are taken into account.
- In the absence of data, estimates were made by extrapolating consumption from the given period to the entire year 2024 or estimating based on other companies of the XTB Group.
- For mixed municipal waste and bio-waste with the selected disposal method as recycling, due to the lack of an emission factor for this given fraction with the selected method of management of this waste, the indicator for the disposal method of incineration was used, which takes into account the same emissions as the indicator for recycling, i.e. transport alone.

- In the absence of data on the weight of electronic waste, it was estimated based on information on the average weight of a given type of device calculated on the basis of data on the weight of devices that were purchased in a given year 2024.
- For electronic waste such as laptops, monitors, servers, docking stations and PCs, average emission factors for product disposal were used, derived from information provided in the EPD cards of electronic devices that were purchased in 2024 by all branches and companies of XTB S.A. For the remaining electronic waste, emission factors provided by the DEFRA 2024 database were used.

- **Category 6: Business trips**

In some companies, travel calculations include data based on cost accounts. Therefore, the amounts given are not net amounts in all cases, as required by the GHG Protocol standard.

- For accommodation, in the absence of information on the country in which the delegation took place, the country in which the given branch or subsidiary of the XTB Group operates was assumed. In some companies, accommodation calculations include data based on cost accounts, therefore, the amounts given are not net amounts in all cases, as required by the GHG Protocol standard.

Category 7: Employee commuting

- Emissions in this category were calculated based on a survey on commuting and remote work, which was completed by employees of the XTB S.A. Capital Group. 56% of employees completed the survey on commuting to work, and then the collected data was extrapolated to all employees.
- This category includes direct emissions from fuel combustion and the production of consumed electricity, but also indirect emissions for these sources, i.e. WTT emissions and direct and WTT emissions from losses in the transmission of electricity.

- According to the GHG Protocol, WTT emissions for this Category do not have to be included, but may be included, while in the calculations for the XTB S.A. Capital Group they were included and amount to approx. 126 t CO₂e, which is approx. 20% of total emissions in this Scope 3 category.

Category 8:

Due to the adopted organisational boundaries, emissions associated with operating leased assets are already included in Scope 1 and Scope 2.

Category 9:

XTB S.A. Capital Group does not conduct any activities related to the transport of products to customers, therefore this category does not apply to it.

Category 10:

This category does not apply to the activities of XTB S.A. Capital Group, because the company does not produce or sell goods requiring further processing by customers.

Category 11: Use of sold products

- Emissions were calculated in accordance with the international ICT standard, based on actual application usage data collected in 2024. The input data on which the calculations were based includes the average user login time from each country, divided into interfaces: mobile application (APP) and xStation platform (WEB). The analyses carried out, which were carried out separately for individual and retail customers, refer only to the aforementioned annual period, which means that the results represent emissions related only to this time.
- For devices with Linux, Macintosh, or Windows operating systems, we assume that the user is using a desktop computer and monitor, because laptops have much lower power consumption. We do not have data on the actual share of laptops

in the market, so we take a conservative approach and assume the use of a PC plus monitor set.

- For phone-type devices, due to the lack of data on power consumption during use, we determined average values for individual operating systems. We then calculated a weighted average, taking into account each system's share of the global phone market. We used the same procedure to determine the average power consumption for tablets.
- Due to the lack of detailed information on the electricity consumption of end-user devices when using the app, it is assumed that the electricity consumption attributed to the app is equal to the total energy consumption of the device. Emissions resulting from data transfer are also included in this category, with the average data transfer per session determined based on the test conducted.
- Under the Corporate Value Chain (Scope 3) Accounting and Reporting Standard, emissions reported by a reporting company in Category 11 that arise from the use of products sold include Scope 1 and Scope 2 end-user emissions. Therefore, WTT emissions are not included in this Category.

Category 12:

In accordance with the ICT Sector Guidance built on the GHG Protocol Product Life Cycle Accounting and Reporting Standard, software end-of-life emissions are only included if the software was distributed on physical media, and the end-of-life emissions of these media should be taken into account. However, the XTB S.A. Capital Group does not provide software in physical form, therefore this emission category does not apply to the Group.

Category 13:

XTB S.A. Capital Group does not conduct any activity related to the rental of assets, hence this category does not apply to the Group.

Category 14:

XTB S.A. Capital Group does not conduct franchise activities, therefore franchise-related emissions do not apply to the Group.

Category 15:

At XTB S.A. Capital Group shares are purchased on a trust basis, to which their rights are assigned to clients as fractional shares. The XTB S.A. Capital Group, in accordance with the agreement, accepts an order to purchase fractional shares and undertakes to acquire the entire share of the company selected by the client. Thanks to this, the client has the opportunity to benefit in proportion to the share portion. Thus, the XTB S.A. Capital Group does not have the ability to select companies and manage the portfolio, because they are the result of client transactions on fractions. According to information provided by the XTB S.A. Capital Group, the scale of shares held by the XTB S.A. Capital Group from such transactions is small.

In addition, XTB S.A. invests part of its cash in bank deposits and financial instruments, i.e. treasury bonds, bonds guaranteed by the State Treasury and corporate bonds guaranteed by banks, which are a capital investment, among others, protecting the funds held by the Company against inflation. The above bonds are instruments measured at fair value through profit or loss.

In accordance with the standard Financial Emissions The Global GHG Accounting & Reporting Standard Part A published by the Partnership for Carbon Accounting Financials and approved by GHG Protocol in connection with compliance with the GHG Protocol Corporate Accounting and Reporting Standard:

- The company should have the discretion to decide which shares of companies it buys.
- Items that are small may be excluded from the financial calculations of emissions.

- Emissions from assets that are held for a short period or those that are intended for sale are not taken into account.
- Emissions from assets that are measured at fair value are not taken into account.

In connection with the above, the XTB S.A. Capital Group is not required to report greenhouse gas emissions from the above shares and bonds held on the balance sheet of the XTB S.A. Capital Group as at 31.12.2024 in Category 15 of Scope 3.

E1-6 From 2024, the XTB Group began calculating the full greenhouse gas emissions generated by its operations. In the course of calculating all emission ranges of the XTB Group, only publicly available spreadsheets (MS Excel) were used. To assess the level of emissions intensity, the GHG emission factor per 1 million net revenue is used at the XTB Group level.

In recalculation of XTB Group's emissions, data were estimated in the following scopes and categories: Scope 1 (stationary combustion, fugitive emissions), Scope 2 (electricity, district heating), Scope 3 cat. 1 (water consumption), Scope 3 cat. 5 (waste generated) and Scope 3 Cat 7 (employee commuting and remote working).

The greenhouse gas emission calculations are not subject to approval by an independent external entity, except for the sustainability certification. The calculations were carried out with an external expert who certified the calculations as confirmation of their correctness.

E1-6 / MDR-M In 2024, all electricity consumed within the XTB Headquarters operations came from renewable energy sources, which was confirmed by guarantees of origin of energy. At the Headquarters (Skyliner office building in Warsaw), in proportion to the energy used in the entire building, the energy consumed by XTB within the leased space can also be considered as coming from renewable sources. The share of consumption of externally purchased electricity from renewable sources (wind energy) confirmed by a guarantee of origin certificate and approved by the Polish Power Exchange is 15.64% in the total

consumption of externally purchased electricity of the XTB S.A. Capital Group. Both the purchased electricity and OZA energy came from the same supplier. The XTB Group does not resell energy to third parties. Data on electricity consumption in the XTB Group, collected for the purposes of calculating greenhouse gas emissions in 2024, were also used to monitor the identified significant impact of the XTB Group on the climate and environment related to the energy-intensive IT infrastructure.



Table 16. Scope 1, 2 and 3 greenhouse gas gross emissions and total greenhouse gas emissions.

	Unit	Base year (2024)	Comparative information	N (2024)	Y/Y difference (%)
Scope 1 greenhouse gas emissions					
Scope 1 GHG gross emissions.	t CO ₂ equivalent	not applicable	none	110,08	not applicable
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes	%	not applicable	none	0,00	not applicable
Scope 2 GHG emissions					
Scope 2 GHG gross emissions by location-based method	t CO ₂ equivalent	not applicable	none	729,40	not applicable
Scope 2 GHG gross emissions as per the market-based method	t CO ₂ equivalent	not applicable	none	496,11	not applicable
Significant Scope 3 GHG emissions					
Total gross indirect GHG emissions (scope 3)	t CO ₂ equivalent	not applicable	none	25 248,96	not applicable
Category 1. Purchased goods and services	t CO ₂ equivalent	not applicable	none	20 551,73	not applicable
Category 2. Investment goods	t CO ₂ equivalent	not applicable	none	525,68	not applicable
Category 3. Fuel and energy activities (not included in scope 1 or 2)	t CO ₂ equivalent	not applicable	none	169,29	not applicable
Category 4. Upstream transport and distribution	t CO ₂ equivalent	not applicable	none	19,05	not applicable
Category 5. Waste generated by the operation	t CO ₂ equivalent	not applicable	none	77,14	not applicable
Category 6. Business travel	t CO ₂ equivalent	not applicable	none	612,35	not applicable
Category 7. Employee commuting	t CO ₂ equivalent	not applicable	none	627,57	not applicable
Category 8. Leased senior assets	t CO ₂ equivalent	not applicable	none	not applicable	not applicable
Category 9. Downstream transport	t CO ₂ equivalent	not applicable	none	not applicable	not applicable
Category 10. Processing of products sold	t CO ₂ equivalent	not applicable	none	not applicable	not applicable
Category 11. Usage of products sold	t CO ₂ equivalent	not applicable	none	2 666,15	not applicable

Category 12. Processing of sold products at end of life	t CO ₂ equivalent	not applicable	none	not applicable	not applicable
Category 13. Leased downstream assets	t CO ₂ equivalent	not applicable	none	not applicable	not applicable
Category 14. Franchises	t CO ₂ equivalent	not applicable	none	not applicable	not applicable
Category 15. Investments	t CO ₂ equivalent	not applicable	none	not applicable	not applicable
Total greenhouse gas emissions					
Total greenhouse gas emissions (location-based method)	t CO ₂ equivalent	not applicable	none	26 088,44	not applicable
Total greenhouse gas emissions (market-based method)	t CO ₂ equivalent	not applicable	none	25 855,14	not applicable
GHG intensity per net revenue					
Total greenhouse gas emissions (location-based) per net revenue (tCO ₂ -equivalent/ mln net revenue)	t CO ₂ equivalent	not applicable	none	13,93	not applicable
Total greenhouse gas emissions (market-based) per net revenue (tCO ₂ -equivalent/ mln net revenue)	t CO ₂ equivalent	not applicable	none	13,80	not applicable

Scope 1 emissions, i.e. emissions directly related to fuel consumption in buildings and transport in 2024 in the XTB Group, amounted to 110,08 t CO₂e, representing 0,43% of the XTB Group's total greenhouse gas emissions (Scope 1 + Scope 2 market-based + Scope 3).

Scope 2 emissions, or indirect emissions, resulted from the generation of purchased electricity and heat. In 2024, they amounted to 496,11 t CO₂e, representing 1,92% of the XTB Group's total greenhouse gas emissions (Scope 1 + Scope 2 market-based + Scope 3).

The vast majority of the XTB Group's emissions in 2024 were Scope 3 emissions, i.e. indirect emissions across the value chain, amounting to 97,65% of all emissions. Based on the completed calculations, there is clear variation between the emissions in the different Scopes and Scope 3 categories. Category 1 of Scope 3 dominates, accounting for 20 551,73 t CO₂e, which is approx. 79,49% of the organisation's overall carbon footprint.

The high values in this category are due to the nature of the company's business, which generates significant expenditure on services, primarily marketing.

The other categories are characterised by much lower emission values fluctuating between 19,05 (Category 4. Transport and distribution in upstream) and 2 666,15 t CO₂e (Category 11. Use of products sold). Although these categories and Scopes contribute to the total emissions, their share is much smaller, accounting for only 18,16% of the organisation's emissions.

Table 17. Calculation methods for individual Scope 3 emission categories

Categories of Scope 3	Name of the method
Category 1	Average-data method (zużycie wody)
	Supplier-specific method
	Spend-based method
Category 2	Supplier-specific method
	Average-product method
	Average spend-based method
Category 3	Average-data method
Category 4	Spend-based method
Category 5	Waste-type-specific method
Category 6	Fuel-based method
	Distance-based method
	Spend-based method
Category 7	Distance-based method
Category 11	Products that directly consume energy (fuels or electricity) during use

The following is a summary of the methods for⁷ calculating GHG emissions for purchased goods and services and capital goods.

Table 18. Emission calculation methods for purchased goods, services and capital goods

Method	Data	Calculation of emissions
Supplier-specific method	Supplier-specific data on GHG emissions of its products/services/capital goods	Cradle-to-gate capital product GHG emissions from suppliers of goods/ services/ capital goods
Hybrid method	GHG emission data from suppliers + secondary data in case of lack of data from suppliers	Scope 1 GHG emissions and 2 produced by suppliers, primary emissions from supplier activity data
Average-data method	Data on the weight or other relevant units of goods and services and capital goods purchased	Assumption based on mass multiplication by average emission factor per unit of good or service
Spend-based method	Data on the economic value of goods and services and capital goods purchased	Economic value multiplied by average emission factors per monetary value of goods

The supplier-specific method has the best data quality, while the spend-based method is the least precise.

⁷ The methods are derived from the GHG Protocol. Technical Guidance for Calculating Scope 3 Emissions (version 1.0). Supplement to the Corporate Value Chain (Scope 3) Accounting & Reporting Standard, 2013. World Resources Institute and World Business Council for Sustainability.

1 873 436 475 PLN

Net revenues used to calculate greenhouse gas
emissions intensity

Calculation methodology

E1-7 / E1-8

The XTB Group does not engage in greenhouse gas removal and mitigation projects funded through carbon credits and does not internally set a greenhouse gas fee. As 2024 is the base period for the comprehensive calculation of the XTB Group's greenhouse gas emissions, no emission reduction targets have been set.

E1-9 In the first reporting periods, the XTB Group uses the exemption within the framework of the anticipated financial effects from significant physical risks and transition risks as well as from potential climate-related opportunities.

2.2. Compliance of XTB Group's activities with the Taxonomy

2.2.1. Non-financial Taxonomy

Contextual information – indicators for non-financial companies

The analyses conducted in relation to the EU Taxonomy were based on the package of EU Taxonomy provisions in force at the time of preparation of this Statement, i.e.:

- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment;
- Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing technical eligibility criteria for determining the conditions under which an economic activity qualifies as making a significant contribution to climate change mitigation or adaptation and whether that economic activity does not cause significant harm to any other environmental objective;
- Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 – supplement to the Regulation (EU) 2020/852 of the European Parliament and of the Council clarifying the content and presentation of the information on environmentally sustainable business activities to be disclosed by companies subject to Art. 19a or 29a of the Directive 2013/34/EU and to specifying the method for compliance with this disclosure obligation;
- Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Commission Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors;
- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 laying down additional technical eligibility criteria for determining the conditions under which certain economic activities qualify as making a significant contribution to climate change mitigation or adaptation, and whether those activities do not cause significant damage to any other environmental objective;
- Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023. supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing technical qualification criteria to determine the conditions under which an economic activity qualifies as making a significant contribution to the sustainable use and conservation of water and marine resources,

to the transition to a closed loop economy, to the prevention and control of pollution, or to the protection and restoration of biodiversity and ecosystems, and whether that economic activity does not cause serious harm to any other environmental objective, and amending Commission Delegated Regulation (EU) 2021/2178 as regards the public disclosure of specific information in relation to those economic activities;

- OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The assessment of compliance with the non-financial taxonomy has been carried out on the basis of existing regulations, including Regulation (EU) 2020/852 on establishing a framework to facilitate sustainable investment and related delegated acts. As a part of the assessment, regulated business activities were identified. The qualification process took into account companies that are part of the XTB Group and whose activities were defined as "non-financial", namely:

- XTB Agente de Valores SpA (Chile)
- XTB Services Limited (Cyprus)
- X Open Hub Sp. z o.o. (Poland)
- XTB Digital Limited (Cyprus)
- Tasfiye Halinde XTB Yonetim Danismanligi A.S. (Turkey)

Based on interviews, workshops with representatives of the Companies and an analysis of the PKD codes (and their relationship to NACE codes), the following were finally qualified for taxonomic evaluation:

Table 19. Activities eligible for the Taxonomy

Name of activity according to PKD classification	Name of activity according to EU taxonomy classification
62.01.Z – Software activities (X Open Hub Sp. z o.o.)	Software activities, IT consultancy and related activities
62 – Computer programming, IT consultancy and related activities (X Open Hub Sp. z o.o.)	
63 – Information service activities (X Open Hub Sp. z o.o.)	Data processing; website management (hosting) and related activities

For qualified activities, a detailed analysis was carried out to confirm whether the qualified activity:

- makes a significant contribution to one or more of the six environmental objectives,
- does not cause serious harm to any environmental objective,
- is carried out in accordance with minimum guarantees and
- meets the technical eligibility criteria.

The necessary evidence was collected to demonstrate compliance and, where documentation was not available, statements and checklists were used to verify compliance with the criteria and/or the implementation of the relevant procedures.

Based on the data collected, it was determined that:

Table 20. Activity evaluation

Name of activity according to EU taxonomy classification	Meeting the criteria for a significant contribution	Complying with the DNSH (Do No Significant Harm) principle	Compliance with minimum guarantees
Computer programming, IT consultancy and related activities	YES (demonstrated for objective 2: climate change adaptation)	YES	YES
Data processing; website management (hosting) and related activities	NO	NO	YES

Accordingly, the activities qualified for assessment were identified as:

Table 21. The result of assessing compliance with the Taxonomy

Name of activity according to EU taxonomy classification	Final evaluation of activities
Computer programming, IT consultancy and related activities	Eligible, in line with the eligible taxonomy, <i>aligned</i>
Data processing; website management (hosting) and related activities	Eligible, not in line with taxonomy <i>eligible, not aligned</i>

The above assessments formed the basis for the preparation of taxonomic disclosures based on three key indicators (KPIs), described below.

For the purpose of calculating non-financial indicators, no disaggregation of data was carried out. For none of the activities included in the Taxonomy was production for so-called own consumption.

a) Turnover rate

Table 22. Turnover ratio – the percentage of turnover complying with the scheme in 2024 relative to the same period in the previous year.

	2024		2023	
	Value of revenues [PLN thousand]	Share of revenue [%]	Value of revenue [PLN thousand]	Share of revenue [%]
Activities aligned with the systematics	5 061	0,27	0	0,0
Activities not aligned with the systematics	1 868 375	99,73	1 618 385	100,0
Total:	1 873 436	100,0	1 618 385	100,0

For the turnover rate:

- based on the Group's total consolidated revenue in 2024 as disclosed in the consolidated financial statements, i.e. PLN 1,873,436 thousand;
- For the purpose of the numerator analysis in respect of 2024, revenue from the sale of products and the provision of services related to XTB Group's activities assessed to be in line with the Taxonomy entitled: Software, IT consultancy and related activities was identified.

XTB Group companies have not issued organic bonds or debt securities to finance specific identified activities aligned with the systematics.

b) Capital expenditure ratio

Table 23. Capital expenditure ratio – the percentage of capital expenditure in 2024, aligned with systematics, relative to the same period in the previous year.

	2024		2023	
	Capital Expenditure [PLN thousand].	Share of capital expenditure [%]	Capital expenditure [PLN thousand].	Share of capital expenditure [%]
Activities aligned with the systematics	4.82	0.02%	0	0
Activities not aligned with the systematics	20 656	99.98%	14 567	100%
Total:	20 661	100%	14 567	100%

For the capital expenditure indicator:

- the basis was capital expenditure in the XTB Group totalling approx. 20 661 thousand calculated on the basis of the IAS/IFRS provisions indicated in the Annex to Regulation 2178;
- for the purposes of the 2024 numerator analysis, revenue was identified from the sale of products and provision of services related to XTB Group's activities assessed to be in line with the Taxonomy entitled: Software, IT consultancy and related activities.

XTB Group has not adopted a capital expenditure investment plan as referred to in paragraph 1.1.2 of Annex 1 to Regulation 2178. Group companies did not issue green bonds or other securities to finance specific identified capital expenditures aligned with the systematics.

c) Operating expenditure ratio

Table 24. Operating expenditure ratio – the percentage of operating expenditure in 2024, aligned with the systematics, relative to the same period in the previous year.

	2024		2023	
	Operational expenditure [PLN thousand].	Share of operational expenditure [%]	Operational expenditure [PLN thousand].	Share of operational expenditure [%]
Activities aligned with the systematics	4 907	0,55%	0	0
Activities not aligned with the systematics	881 793	99,45%	694 230	100%
Total:	886 701	100%	694 230	100%

For the operational expenditure indicator, a component item analysis of operational expenditure was carried out as defined by the EU Non-Financial Taxonomy, resulting in a denominator value for the operational expenditure indicator of approx. PLN 886,701 thousand.

For the purposes of the 2024 counter analysis, revenue was identified from the sale of products and provision of services related to XTB Group's activities assessed to be aligned with the Taxonomy entitled: Software, IT consultancy and related activities.

Performance tables for the turnover, capital expenditure and operating expenditure indicators respectively are included in in a further part of this report.

2.2.2. Financial Taxonomy

Contextual information – indicators for investment companies

Art. 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 establishing a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088 ("Taxonomy") provides for the publication by investment firms of information

on how and to what extent their activities are related to and compatible with business activities that qualify as environmentally sustainable under Art. 3 and 9 of the same Regulation.

It should be clarified that, given XTB Group's specific business model, which includes operating on the OTC market, the key disclosure indicators related to its asset portfolio resulting from its proprietary trading activities differ significantly from the significance of such data for other financial companies and investment firms.

In particular, it should be pointed out that while XTB holds a portfolio of financial assets, this portfolio of assets does not have the character of a classic investment portfolio. XTB Group is not in the business of financing business activities or investment projects. On the other hand, given the XTB Group's business model, income of an operational nature

is generated from its portfolio of financial assets. The result on financial assets at fair value through profit or loss represents the result on financial instruments from transactions with clients and brokers.

Table 25. Information on the portfolio of assets measured at fair value through profit or loss. The assets included in this portfolio correspond to those invested in the investment company's proprietary trading business.

	As for 31.12.2024			As for 31.12.2023		
	Value [in PLN thousand]	Share of in total Group assets [%].	Share in financial assets valued at fair value through financial outcome	Value [in PLN thousand]	Share in total Group assets [%]	Share in financial assets valued at fair value through financial outcome
Derivatives contracts for differences (CFDs)	521 792	7,8%	46,4%	485 303	10,3%	53,7%
Debt instruments (government bonds and corporate bonds)	429 648	6,5%	38,2%	401 265	8,6%	44,4%
Shares and ETPs	172 483	2,6%	15,4%	16 687	0,4%	1,9%
Total assets invested in the proprietary trading business of an investment firm	1 123 923	16,9%	100%	903 255	19,3%	100%
Total assets (balance sheet total)	6 645 632	100%	n.a.	4 688 658	100%	n.a.

The structure of the portfolio of financial assets indicated above consists of: Derivatives – for which the percentage of total assets invested within the activities of investment firms for proprietary trading exposure referred to in Art. 7 sec. 2 of Regulation 2021/2178, i.e. derivatives, is 46.4%.

government and corporate bonds – the percentage of total assets invested within the activities of investment firms for proprietary trading exposure referred to in Art. 7 sec. 1 of Regulation 2021/2178, i.e. exposures to central governments, central banks and supranational issuers, is 38.2%.

The remainder of XTB's asset portfolio consists of equities and Exchange Traded Product (ETP) units. The shares and ETP units held are responsible for approx. 15.4% of the portfolio above and 2.6% of total assets. The shares held in the portfolio in question are collateral for a transaction in which an XTB client acquires a so-called synthetic share. Thus, the composition of the equity portfolio is mainly driven by the structure of orders received from clients and brokers. The composition of the equity portfolio held is adjusted on an ongoing basis to meet subsequent client orders. Accordingly, the Issuer does not, at any stage of the creation of the portfolio in question, assess or take into account aspects that would be linked to the eligibility or compatibility of the assets concerned from the point of view of the Financial Taxonomy. The above significantly differentiates XTB Group's asset portfolio from the loan portfolio of a credit institution or the investment portfolio of an investment fund or analogous entity. In practice, the composition of the portfolio of non-financial assets within the XTB Group may change on a daily basis, significantly and unintentionally. The structure of the portfolio, in particular equity portfolio, is therefore almost random from the point of view of the eligibility of individual issuers' activities to the Financial Taxonomy.

For reporting purposes, an assessment was made for taxonomy eligibility and XTB Capital Group's activities were classified as a Financial Enterprise pursuant to the provisions of Art.

5 of Commission Delegated Regulation (EU) 2021/2178, resulting in the need to complete the templates contained in Annex VIII of that regulation.

Pursuant to Art. 7 sec. 1 to 3 of Commission Delegated Regulation (EU) 2021/2178, exposures to central governments, central banks and supranational issuers are not included in the numerator and denominator of the key performance indicators, in addition, this numerator also does not include derivatives and exposures to corporates that are not subject to the obligation to publish non-financial information pursuant to Art. 19a or 29a of the Directive 2013/34/EU.

Pursuant to Art. 7 sec. 6 of Commission Delegated Regulation (EU) 2021/2178, the numerator and denominator of the key performance indicators are divided into the exposure categories listed in the provision.

Transactions concluded for own account:

The asset-related key performance indicators described in Art. 2 Annex VII of the Commission Delegated Regulation (EU) 2021/2178, have not been calculated, because XTB S.A. Group Companies did not execute proprietary transactions in 2024 other than:

- bond purchase,
- transactions related to orders from clients on derivatives,
- the purchase of shares and ETPs of an ancillary nature for the execution of retail client orders.

Bonds may not be included in the numerator and denominator of key performance indicators in accordance with Art. 7 sec. 1 of Commission Delegated Regulation (EU) 2021/2178.

Transactions for the own account of XTB S.A. Group companies were therefore in 2024 primarily transactions related to client orders in derivatives. However, derivatives may not be included in the numerator of key performance indicators pursuant to Art. 7 sec. 2

of Commission Delegated Regulation (EU) 2021/2178 which reads: "Derivatives shall be excluded from the numerator of key performance indicators of financial corporations". By definition, derivatives do not constitute investments in companies within the meaning of Art. 2 Annex VII of Commission Delegated Regulation (EU) 2021/2178, as they are a financial instrument value of which depends on the value of the underlying instrument, which may be a stock, bond, currency or stock index, and the purpose of using derivatives is not to transfer capital but to transfer risk. Also, the purchase of shares and ETPs in an ancillary capacity in order to execute retail clients' orders does not constitute proprietary trading, as it only concerns the taking of positions in order to trade for clients' accounts.

According to the information above, there is no grounds to calculate the key performance indicators related to assets, as indicated in formula 1 in the Annex VIII of Commission Delegated Regulation (EU) 2021/2178.

The main key performance indicator titled Total environmentally sustainable assets are 0%, as the Art. 7 sec. 1 and 2 of Commission Delegated Regulation (EU) 2021/2178 stipulating that it is excluded from the numerator and denominator and derivatives are excluded from the numerator in the calculation of key performance indicators of financial corporations, and in 2024 there were no transactions made on the company's own account other than those listed above.

Transactions other than those made on company's own account:

XTB S.A Group companies in 2024 performed transactions other than those on its own account, namely transactions related to orders from and for clients in the formula contained in Annex VIII of Commission Delegated Regulation (EU) 2021/2178 that provides performance indicators on revenue.

The amount of revenue generated in 2024 for the types of services listed below, required for investment companies, is:

- reception and transmission of orders in relation to one or more financial instruments – non applicable;
- execution of orders on behalf of clients: approx. PLN 15 741 thousand (including PLN 0 from institutional clients) – at the end of 2024;
- trading on company's own account - (the following occurred: purchase of bonds (approx. PLN 26 million – as at the end of 2024), derivative instruments (approx. PLN 1,770 million, including approx. PLN 78 million from institutional clients – as at the end of 2024), purchase of shares and ETPs of an ancillary nature in order to execute client orders (approx. PLN 15 million – as at the end of 2024, including PLN 0 from institutional clients);
- portfolio management – non applicable;
- investment advice - non applicable;
- underwriting of financial instruments or underwriting of financial instruments with a guarantee of assumption of issue - non applicable;
- underwriting of financial instruments without a guarantee of assumption of issue – non applicable;
- running the MTF – non applicable;
- running the OTF – non applicable.

Other revenues in addition to the above, i.e. those that are not required to be reported for investment companies in the template included in the Annex VIII of Commission Delegated Regulation (EU) 2021/2178 and thus not eligible for the Taxonomy, amounted to approx. PLN 73 million – stock at the end of 2024.

The XTB S.A. Group Companies executed in 2024 transactions on their own account, which were related to client orders in the field of derivatives, for 45 institutional clients – listed in item (c) in sec. 1 above. For the 4 institutional clients subject to the publication obligation, a published ESG Report with taxonomic disclosures is available, so a questionnaire requesting information on taxonomic disclosures was sent to 41 institutional clients. One client

completed the taxonomic disclosure tables in response to the survey. Other clients do not publish and have not provided taxonomic disclosures in their survey responses.

The main key performance indicator titled Total revenue from environmentally sustainable activities and services is 0%, due to Art. 7 sec. 2 of Commission Delegated Regulation (EU) 2021/2178, stipulating that Derivatives are excluded from the numerator of key performance indicators of financial corporations. Revenue from executing orders on behalf of clients, amounted to PLN 0 from institutional clients and thus it is not possible to calculate the indicator according to the method imposed by Art. 2.4 Annex VII of the Commission Delegated Regulation (EU) 2021/2178: "the numerator shall be defined as the weighted average of the revenues (fees, commissions other monetary benefits) earned by the investment firm in relation to the total value of business consistent with the systematics within client business". If there are no institutional clients in the category of revenue from the execution of orders on behalf of clients, because they are exclusively individual clients, it is not possible to obtain information on compliance with the systematics within the clients' activities. In contrast, in the category of income from trading on company's own account, there is only income from derivatives, excluded from the main performance indicator by Art. 7 sec. 2 of Commission Delegated Regulation (EU) 2021/2178, the purchase of shares and ETPs of an ancillary nature for the execution of orders of retail clients and the purchase of bonds, which are excluded in the calculation of key performance indicators of financial undertakings.

Assignment to the relevant environmental objective of the revenues eligible for systematisation in the corresponding row for revenues from transactions conducted on one's own account in formula No. 2 contained in Annex VIII of Commission Delegated Regulation (EU) 2021/2178 is based on the taxonomic disclosures of four institutional clients for which there is a published ESG Report with taxonomic disclosures and one client not subject to the publication obligation who has completed the taxonomic disclosure tables. The amount of revenue from trading on company's own account, i.e. approx. 78 million at the end of 2024, represents the sum of the revenues eligible for systematisation in formula No. 2 contained in

Annex VIII of Commission Delegated Regulation (EU) 2021/2178, but not in line with the systematics, due to the exclusion of derivatives from the numerator. On the other hand, revenue from the execution of orders for the account of clients is not included under revenue eligible for systematics, as this revenue category does not include institutional clients, only individual clients, for which it is not possible to obtain information on compliance with systematics in the client activity reports.

Income from fractional shares related to individual clients only, there were no transactions with fractional shares on behalf of institutional clients and therefore not included in the income qualifying for the Taxonomy.

Given the assumption made regarding the non-qualification of assets for systematics, the Issuer has also assumed that the percentage of total assets of the exposure referred to in Art. 7 sec. 3 of Regulation 2021/2178, i.e. exposures to companies that are not subject to the obligation to publish non-financial information pursuant to Art. 19a or 29a of Directive 2013/34/EU amounts to 0%.

The XTB Group did not modify the presentation of the indicators above compared to the previous financial year.

The XTB Group does not engage in third-party financing activities.

The XTB Group companies did not issue green bonds and green debt securities to finance certain identified activities and the XTB Group companies did not make investments in green bonds and green debt securities issued by third parties. The XTB Group neither granted nor has any special purpose loans in its portfolio.

2.2.3. Minimum guarantees

Human and labour rights

XTB S.A. implements a due diligence process based on:

- due diligence in management, operational and strategic processes and implemented corporate documents;
- cooperation with stakeholders (Stakeholder Survey, Employee Satisfaction Survey);
- identification of adverse impacts, taking action to mitigate them, risk management, internal audit and compliance;
- monitoring the effectiveness of efforts and processes undertaken, updating corporate documents, analysing reports received;
- taking appropriate remedial action.

We operate in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines. We are committed to respecting all human rights as recognised and defined in internationally recognised documents such as:

- The 10 principles of the UN Global Compact,
- the Universal Declaration of Human Rights,
- the UN Guiding Principles on Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises,
- the principles related to fundamental rights at work contained in 8. ILO Fundamental Conventions as set out in the Declaration on Fundamental Principles and Rights at Work and to avoid/minimise potential negative impacts of XTB's activities on human rights.

As of 2019, XTB S.A. Head Office has a Code of Ethics in place, which sets out the basic standards, principles of conduct and values. An implemented anonymous whistleblowing procedure sets out the rules for making anonymous reports for actual or potential breaches of the law, including breaches of anti-money laundering and counter-terrorist financing regulations, internal procedures and ethical standards. Violations are reported in a dedicated electronic form allowing anonymity.

Integrating accountability principles into management systems

XTB's governance system is based on transparent principles with a formal and legal background to ensure transparent and responsible practices. The 2024 *Double Materiality Assessment*, based on interviews, surveys and workshops with XTB stakeholders, detailed material risks, material opportunities and material impacts. The analysis refers to the indicators of the European Union ESRS sustainability reporting standards to ensure its completeness. The results of the work made it possible to prepare sustainability reporting, but also to update XTB's strategic directions and objectives, which reflect the organisation's needs and plans over the assumed time horizon. In fostering relationships based on mutual trust, we emphasise regulatory compliance, quality and accountability, reflecting the nature of XTB's business as an investment firm.

Identification and assessment of negative effects

Within the framework of identified negative effects related to XTB's activities, we assess them and take or plan adequate preventive actions. These actions are based on the company's internal communication, procedural and formal background, and internal and external whistleblowing procedure under whistleblower protection. The Head Office also has a Risk Management Strategy and a Risk Management System in place, covering employees and XTB subsidiaries. Its objective is to design and implement processes, design, develop and implement internal documents for, among other things, measuring, estimating, mitigating and controlling risks.

Intervention, prevention and mitigation of effects

At XTB S.A., we do not tolerate any manifestations of discrimination or negative behaviour detrimental to colleagues. We take preventive measures including internal communication, procedural and regulatory back-up, as and a good working atmosphere within the organisation. In the event of a reported breach, we undertake to carry out an internal investigation, including interviewing witnesses, collecting evidence and analysing the documentation collected, and to take appropriate remedial action, i.e. to carry out additional employee training selected on the basis of the findings.

A key role in monitoring the compliance of XTB's activities with the law is played by a Supervisory Inspector representing XTB's compliance area. Supervisory Inspector performs their duties on the basis of the regulations implemented, the purpose of which is, among other things, to establish a system for the supervision of compliance with the law, aimed at disclosing and preventing breaches by XTB of its obligations under the laws governing the conduct of brokerage activities.

The objectives of the business compliance oversight system at XTB are achieved through, among other things:

- taking action to ensure that the Company complies with its obligations under the laws governing the conduct of brokerage activities,
- consulting and ongoing assistance for persons carrying out activities as part of XTB's brokerage activities in fulfilling their obligations in accordance with the legal provisions governing their conduct,
- examining and regularly assessing the adequacy and effectiveness of the compliance system adopted, as well as the actions taken to comply with XTB's obligations under the laws governing the conduct of brokerage activities.

Ensuring the proper operation of the compliance system in XTB branches is the responsibility of the person designated in the structure of the XTB branch concerned, who in this respect reports directly to the Supervisory Inspector.

XTB's compliance risk management process includes identifying compliance risks, assessing the likelihood of their occurrence, assessing the consequences of the occurrence of a given compliance risk, assigning weights to individual risks, applying risk mitigation measures and documenting the measures applied.

As part of XTB's compliance system, control proceedings are carried out at XTB's business units in accordance with generally applicable regulations.

In 2024, one of XTB S.A.'s subsidiaries was the subject of a discrimination case, which was concluded with a settlement at the beginning of 2025. In addition, there was a single labour law proceeding in one branch and two incidents that ended with the withdrawal of a lawsuit and a settlement, respectively. All submissions were reviewed and assessed by XTB.

There have been no enquiries from either the OECD National Focal Point or the Business and Human Rights Resource Centre towards the Head Office or Group companies within the last 12 months. The Company is subject to inspections by state institutions and the company complies with all follow-up recommendations.

XTB S.A. is not active in the controversial arms manufacturing sector.

Anti-corruption

The Company has anti-corruption procedures and policies in place, i.e. XTB S.A.'s Anti-Corruption Policy and XTB S.A.'s Code of Ethics. They include measures concerning gift policy, as well as management of conflict of interest and corporate ethics. In addition, an incentive management policy and conflict of interest management regulations have been adopted at XTB. In addition, all centralised purchases (i.e. made in Poland) are carried out in accordance with a dedicated procedure for the purchase of goods and services.

XTB is an obliged institution within the meaning of the Anti-Money Laundering and Terrorist Financing Act. In view of the need to ensure compliance with the aforementioned regulations, XTB has adopted an AML/ CFT Procedure setting out detailed solutions, including the responsibilities of employees of individual departments in the area of anti-money laundering and terrorist financing. The rules for anonymous reporting of violations, including Anti-Money Laundering and Counter-terrorist Financing violations, are set out in a dedicated procedure.

XTB's suppliers, in accordance with the wording of their contracts with XTB, have been obliged to familiarise themselves with the contents of XTB S.A.'s Anti-Corruption Policy and to act in accordance with its provisions and to report any suspicions of corruption and to support investigations.

No cases of corruption had been identified at XTB S.A.'s companies and branches during the reporting period under review and no proceedings related to corruption-related offences are pending.

Data and systems security

XTB pays the utmost attention to data and system security. Speaking of digital security, access to the XTB xStation application is protected by authorising access with a password, fingerprint or code. Connections between XTB servers and the XTB xStation application are fully encrypted. XTB clients' funds are protected. The funds can only be withdrawn to the client's account. Key information is authenticated in multiple stages. XTB's website has content dedicated to XTB S.A.'s cyber security. The company provides information about the types of digital risks at: <https://pl.xtb.com/bezpieczenstwo-w-sieci>

XTB S.A. has its own Cookies Policy and Privacy Policy. The Privacy Policy has been prepared in accordance with the information obligation resulting from Art. 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the

free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: "GDPR"). A Data Protection Officer has been appointed at XTB S.A.

Tax area

XTB S.A. has a set of identified and described processes and procedures for managing the fulfilment of its obligations under tax law and is able to ensure that internal controls for the tax function are functioning properly. It has the appropriate personal, technical and financial resources necessary to implement them and maintain oversight of the correct implementation of tax obligations. XTB's tax strategy is to strive to create and maintain an effective and transparent tax function within the company, which ensures compliance with tax regulations and control of tax risks. In accordance with applicable law, we draw up and make public information on the tax strategy implemented.

The company has tax risk management processes in place and tax governance and tax compliance are an important element of tax supervision. XTB S.A.'s tax strategy is to strive to create and maintain an effective, efficient and transparent tax function within the company, which in effect ensures compliance with tax regulations and the certainty of tax risk control.

The Company has implemented appropriate management and control processes to ensure that the operation complies with the applicable tax legislation, that the required tax returns and information are submitted correctly and on time, and that taxes are paid. The Company's books of account are kept in a reliable manner and enable the proper performance of any tax obligations imposed on XTB. All business processes and ventures at XTB are carried out taking into account the requirements for fulfilling obligations and tax processes.

The primary tax function within the Company's structure is the Tax Team which operates within the Finance and Accounting Department and is managed by the Director of Taxes, supervised by the Member of the Management Board for Finance (who is also the Chief Financial Officer).

In order to manage the performance of tax obligations under tax law, the Company has developed and implemented appropriate procedures, including an Instruction defining the scope of responsibility for the performance of tasks on the subject of XTB S.A.'s tax liability settlements. The roles, duties as well as responsibilities of the employees related to the execution of the tax function are included in the document: Internal Organisational Regulations of the Finance and Accounting Department dated 28 June 2024.

The Company also has other procedures in place, which are further elements of the tax governance implemented, to address tax issues such as e.g. Internal Procedure for dealing with non-compliance with the obligation to provide information on tax schemes.

Tax risks are identified and assessed on an ongoing basis, in the course of the day-to-day work of the Tax Team staff, as well as being discussed during regular meetings between the Tax Team staff and the Director of Taxes and between the Director of Taxes with the Member of Management Board for Finance.

Starting from October 2024, a tax audit is underway at XTB S.A. regarding corporate income tax regarding the application of the method of determining the transaction price between XTB S.A. and related foreign entities recognized by the Head of the National Revenue Administration resulting from the decision received by the Company on APA. The tax audit is conducted on the basis of the provisions of the Act of August 29, 1997, the Tax Ordinance (Journal of Laws 2023.2383, as amended) (art. 281 et seq.) in connection with art. 104 sec. 1 item 2 of the Act of October 16, 2019 on resolving disputes regarding double taxation and concluding advance pricing agreements (Journal of Laws 2023.948).

Environment and climate

The XTB Group has implemented a Climate Policy, which sets out, among other things, the challenges it faces in relation to climate change, or targets for the coming years. For more information, please refer to Chapter 2 of this Statement.

The XTB Group published an ESG Strategy and, from 2022, published sustainability reports in line with the SIN reporting standard, part of which included a carbon emission report. From 2024 onwards, XTB Group publishes the full carbon footprint of its operations calculated in cooperation with an external expert specialising in this area in three scopes, which has been subject to limited assurance attestation. Both reports and strategies are publicly available on the company's website.

Fair competition

There is no policy in place at XTB S.A.'s Head Office governing the prevention of unfair competition. During the 2024 reporting period under review, no violations of fair competition rules were identified and no proceedings were conducted in this regard.

Minimum Guarantees of the non-financial company X Open Hub Sp. z o.o.

The operational activities of X Open Hub Sp. z o.o. reflect OECD and UN human rights guidelines and International Labour Organisation conventions. Actions are implemented as part of due diligence, including: identifying and assessing risks, implementing remedial actions, monitoring effectiveness and ensuring access to remedies. The Company has reviewed the policies and procedures in place and all activities are monitored and reported in accordance with internal regulations. These activities cover key areas such as human rights, employment and labour relations, environmental protection, anti-corruption, consumer interests, science and technology development, competition and taxation.



XTB Group Minimum Guarantees

On the scale of the XTB S.A. Capital Group – XTB S.A.'s subsidiaries and branches – analysis of their documents (policies, procedures, regulations) is underway. If necessary, upon completion of the analysis, recommendations will be made to all units with regard to the implementation of the missing corporate documents (after alignment with local laws).



3. Society

3.1 Our employees

- 3.1.1 Employment structure
- 3.1.2 Diversity and equality
- 3.1.3 Working conditions
- 3.1.4 Training and development
- 3.1.5 Policies and regulations
- 3.1.6 Work safety and comfort
- 3.1.7 Incidents and complaints related to human rights

3.2. Consumers and end-users

- 3.2.1 Clients of XTB Group
- 3.2.2 Consumer and end-user policies
- 3.2.3 Notification channels and remedial actions

SOCIETY



3. Society

3.1. Our employees

One of XTB Group's key stakeholders are its employees. It is their commitment, competence and individual personality traits that create our organisational culture and have been influencing the business results of XTB's operations for more than 20 years.

As an employer employing and cooperating with over 1,000 people worldwide, we are aware of our impact on the quality and balance of their professional and private lives. A pro-employee working atmosphere, stable and competitive employment conditions, and non-wage benefits mean that as many as 87% of employees would recommend XTB as a good place to work. This is the result of an employee satisfaction survey conducted at the beginning of 2024 in the XTB Group. At XTB, we also take care of maintaining appropriate occupational health and safety standards in the workplace through training and the introduction of periodic first aid training for our employees.

During the double significance analysis, we did not identify significant impacts in the area of respecting human rights, although we attach importance to maintaining the highest standards of cooperation in our team, and we treat respecting human rights as a priority. Our employees are treated with respect and respect for the principles of equality, and the basic criterion for employment or promotion is their competence. Our commitments to respect human rights in accordance with international standards are described in Chapter 2.2.3. Minimum Guarantees and in the XTB S.A. *Diversity Management, Equal Treatment and Inclusion Culture Policy* (DEI).

We are working on strengthening communication with our employees in the face of the dynamic increase in employment in the XTB Group. The largest employment is characteristic of the XTB Headquarters in Warsaw, which dominates in this respect over branches and foreign companies. The interests of individual employees of the Headquarters before the Management Board of XTB S.A. are represented by employee representatives, direct superiors and the Director of the Management Department

Human Capital, which ensures continuity of dialogue and cooperation with the team of employees. Due to the dynamic development of our business, we strive to improve communication activities with employees. Our messages are created bilingually, we have implemented an internal intranet platform and we use internal mailings. Employees have direct contact with their superiors and members of the Management Board if necessary. In order to strengthen the organizational culture, occasional integration meetings are also organized.

SBM 3 S1-1 In 2024, we updated the ESG Strategy for 2024-2027. It was based on the results of the stakeholder survey, and its objectives were consulted with employees responsible for a given area of interest of the Strategy. These individuals are operationally involved in the implementation of the strategic objectives and report progress to the ESG Team. By employee area, we mean all employees of the XTB Group employed under an employment contract, on whom XTB as an employer has a significant influence, as well as non-employees who constitute its own employee resources (individuals cooperating on the basis of B2B contracts and civil law contracts). Both actual and potential identified significant influences in the employee area allowed us to update and adjust the ESG Strategy for 2024-2027, without affecting the organization's business model. The links between opportunities and risks and the strategy and business model are included in the IRO tables in Chapter 1.6 of this Statement.

Building relationships and a good working atmosphere is very important to us. That is why we have implemented initiatives and projects related to the employee area in 2024 at XTB Group, also in collaboration with the XTB Foundation:

- "Inner Power" workshops series to encourage employees to share their passions and interests;
- sports activities, chess activities, going to matches together;
- health examinations and consultations for XTB Head Office employees;
- workshops and research on cancer prevention for employees as a part of the "Pink October" and "Movember" campaigns;
- first aid training as part of a regular event;
- flu vaccination at the office;
- employee volunteering actions, i.e. cleaning up the Kabaty forest in Warsaw;

SBM-3 S1-1 Staff representatives took part in workshops and in-depth interviews for the Double materiality assessment, which allowed us to identify risks and opportunities related to our own employees. These are described in the ESRS 2 SBM-3 disclosure in section 1.6. of the Statement.

The Management Board of XTB S.A. and the Human Capital Management and HR Tech departments supervise employee engagement at every stage of employment:

- during the recruitment, employment and implementation process,
- during work through surveys, periodic interviews, ongoing conversations with superiors,
- during the termination of cooperation.

This engagement is visible in the participation of employees in organized initiatives and employee satisfaction survey assessments.



At the time of publication of the Statement, we do not identify the possibility of the impact of a potential transition plan to reduce the negative impact on the environment on employees and associates of the XTB Group. There is no possibility of forced labor or child labor in the XTB Group, either in terms of type of activity or geographical location. During the Double Materiality Study, the XTB Group analyzed its value chain and business model with understanding, unanimously agreeing

that there is no such risk, including from the regulated nature of the XTB Group's activity, the location of its offices, the nature of work that cannot be performed by children due to the need to have specific competences and cooperation with partners with impeccable reputations.

2024 is the first year for which we are presenting data according to ESRS standards, therefore we are not reporting changes to the methodology for calculating the indicators of this chapter.

Characteristics of the XTB Group employees

SBM-3

Employees, as defined by XTB, are natural persons employed at branches and Group companies under a contract of employment.

By own workforce, we mean persons cooperating with XTB Group entities on the basis of, inter alia, self-employment, contracts for specific work, contracts of mandate, appointments, etc.

Among the employees working at XTB S.A. branches and companies, a distinction is made between employees in the IT area and administrative and clerical staff of various specialisations.

We do not have operations that may be at significant risk of incidents of forced labour, compulsory labour or child labour, and we do not identify an employee group on which we may have a particularly negative impact.

3.1.1. Employment structure

S1-6 Poland is the only country where the XTB Group has more than 50 employees representing at least 10% of the total XTB Group employment. Therefore, we do not present information on the number of employees by country. Detailed employment information is presented in the following published tables and includes data on employees employed at the end of the reporting period, i.e. at 31.12.2024.

As at 31.12.2024, the XTB Group employed:

66%

MEN

34%

WOMEN

90%

**STAFF EMPLOYED FOR AN
INDEFINITE PERIOD OF TIME**

Among the Group's 1015 employees, as many as 703 were employed at the XTB S.A. Head Office in Warsaw as of 31.12.2024, representing 69.26% of the Group's workforce.

Table 26. Number of XTB Group employees by gender as of 31.12.2024.

Gender of the employee	Number of employees
As for	31.12.2024
Women	347
Men	668
Others	0
Not disclosed	0
Total	1 015

To calculate the S1-6 disclosure indicators, data was collected on the number of employees as at 31.12.2024. The exception is the turnover indicator, where the total number of people who left XTB in 2024 was identified. In relation to the financial statements, where the total number of employees and associates disclosed is 1,245 people, there is a difference in connection with the inclusion in the summary for the purposes of sustainable development reporting of people on maternity leave, parental leave and benefits (leave of absence exceeding 33 days).

Table 27. Number of employees of XTB Groups by gender and nature of cooperation

As for	31.12.2024				
Gender	Women	Men	Others	Not disclosed	Total
Number of employees	347	668	0	0	1 015
Number of staff employed for an indefinite period of time	312	601	0	0	913
Number of fixed-term employees	35	67	0	0	102
Number of employees who are not guaranteed working hours	0	0	0	0	0
Number of employees	347	668	0	0	1 015

As of December 31, 2024, the XTB Group was predominantly staffed by men (66%), and 90% of employees were employed under an employment contract for an indefinite period.

Table 28. Employee turnover rate*

Reporting period	01.01.2024 – 31.12.2024
Total number of employees who left XTB Group during the reporting period	134
Employee turnover rate during the reporting period (%)	13%

*Persons who left and were reinstated in the same reporting period are not included in the indicator.

In 2024, 134 employees left the XTB Group, which constitutes 13% of total employment in the XTB Group as at 31.12.2024. The indicator does not include people who left and were reinstated in the same reporting period. In order to calculate the turnover rate, the number of employees who left was compared to the total number of employees as at 31.12.2024.

S1-7 Other forms of cooperation

As of 31.12.2024, the following forms of cooperation with persons who were not employees of XTB Group branches and companies have been used:

- Self-employment (B2B)
- Contract of mandate
- Contract for specific work
- Appointment

The table below presents the number of persons cooperating with the XTB Group as at December 31, 2024 (all cooperating persons are listed, except for persons who are simultaneously employed under an employment contract with XTB Group companies).

Table 29. Characteristics of own workforce – non-employees of XTB Group

Form of cooperation	As of 31.12.2024
Number of persons cooperating on a self-employed basis (B2B)	193
Number of persons cooperating based on civil law contracts: (mandate and specific work)	47
Number of persons cooperating based on an appointment	6
Number of persons cooperating through an employment agency	6
Total:	252

3.1.2. Diversity and equality



At XTB, diversity is one of the foundations that allows us to build a global organisation based on mutual respect, kindness and partnership. Our team is made up of employees with different nationalities, views, experiences, backgrounds and values, and each employee brings unique perspectives, allowing us to create innovative investment solutions for over 20 years.

Diversity at XTB not only enriches the organisational culture, but also creates space for employees to fully identify and realise their potential. Together we aim to build a working environment based on empathy and mutual support, where every employee has an equal opportunity to develop their career, achieve success and receive an objective evaluation of their work.

The XTB Group's recruitment standards aim not only to attract talented candidates but also to create a working environment where employees will want to stay. The recruitment process is conducted in a transparent manner, giving equal opportunities to candidates applying for the same position.

S1-9 The following assumptions were made regarding the diversity indicators:

- the top management diversity index included all persons holding director and managerial positions, regardless of the legal basis of cooperation as of 31.12.2024;
- when presenting the age structure of employees, reference was made only to employees employed under an employment contract in accordance with the employment status as of 31.12.2024.

Diversity indicators

S1-9

Table 30. Diversity index of top management as of 31.12.2024 (regardless of the form of cooperation)

Gender of the employee	Number of people at the top management level	Percentage of people at the top management level (%)
As for	31.12.2024	
Women	13	20,63%
Men	50	79,37%
Others	0	0
Not disclosed	0	0
Total	63	100%

Table 31. Age structure of employees as at 31.12.2024

Data for the balance as of	31.12.2024				Total number of employees by age
Gender	Women	Men	Others	Not disclosed	
Number of employees under 30	130	253	0	0	383
Percentage of employees under 30	37,46%	37,87%	0	0	37,73%
Number of employees between 30 and 50	212	400	0	0	612
Percentage of employees between 30 and 50	61,10%	59,88%	0	0	60,30%
Number of employees over 50	5	15	0	0	20
Percentage of employees over 50	1,44%	2,25%	0	0	1,97%
Total number of employees by gender	347	668	0	0	1 015

3.1.3. Working conditions

S1-10 / S1-16

In terms of remuneration, the Group applies market principles, i.e. it makes the level of employees' remuneration dependent in particular on their knowledge, professional experience and substantive contribution to the development of the Company.

At XTB, we periodically analyse the evolution of women's and men's salaries in each department. If discrepancies are identified, the director of the business unit concerned is consulted and corrective action is taken if necessary. The XTB Group has not set indicators related to adequate remuneration for the assessment of results and effectiveness in relation to significant impacts, opportunities and risks.

All XTB Group employees receive appropriate remuneration in accordance with the provisions of the applicable local law according to the location of the branch and XTB S.A.

Information on equal pay ratios for the XTB Head Office and the XTB Group is presented below for the first time. The company presents the indicator for XTB Head Office separately, bearing in mind:

- the widest diversity of positions compared to other branches and subsidiaries, which are dominated by people employed in sales positions and
- the highest percentage of Group-wide employment at XTB Head Office as of 31.12.2024, i.e. 69.26%.

The pay gap and total compensation indicators have not been assessed by an independent expert, except for the sustainability attestation.

Table 32. The pay gap of XTB S.A. Head Office and XTB S.A. Group.

As for 31.12.2024	XTB S.A. Head Office	XTB Group
Nominal basic wage	24,74%	23,32%
Total remuneration (basic wage and bonuses)	29,01%	31,56%

Table 33. Wage gap ratio of employees of XTB S.A. Head Office in 2024

		Pay gap excluding IT employees	Pay gap including IT employees
As for 31.12.2024			
Indicator based on basic salary	Directors and Management Board	32,46%	31,84%
	Employees in leading and managerial positions	3,47%	7,92%
	Employees in other positions	-4,31%*	18,74%
Index based on basic salary with benefits	Directors and Management Board	44,67%	44,62%
	Employees in leading and managerial positions	13,95%	14,49%
	Employees in other positions	3,82%	19,75%

*Women salary higher than men's salary.

Methodology for calculating the wage gap indicator

For the purpose of calculating the indicator, the following assumptions were made:

- the wage gap was calculated for contract employees at branches and XTB Group companies,
- the average hourly rate per employee has been calculated on the basis of the basic salary declared in the employment contracts as of 31.12. and the basic salary including additional salary elements paid in the period 01.01.2024 - 31.12.2024,
- the indicator was recalculated in two variants: including the salaries of employees representing the IT sector and excluding the salaries of the above-mentioned employees.

The wage gap was calculated according to the formula proposed in the ESRS standards:

Average level of gross hourly wage of **male** employees

—

Average level of gross hourly wage of **female** employees

x 100

Average level of gross hourly wage of male employees

The level of the XTB Headquarters pay gap differs both in terms of the type of remuneration (base salary/base salary and benefits) as well as in terms of including employees representing the IT industry and excluding them from the calculation. The difference in the size of the Headquarters indicator based on base salary compared to base salary increased by additional benefits is mainly related to the greater share of men employed in the Trading Department and the Sales Department, in which additional benefits (i.e. in particular bonuses and premiums) are higher than similar benefits in administrative positions.

A factor influencing the wage gap at XTB Head Office is the employment of IT staff (in particular software developers), which as at 31.12.2024 was approx. 46% of employees at XTB Head Office for whom the salary level as well as the predominant male gender share in this category results in a gender pay gap. The high salaries in this professional group are related to wage pressures in the labour market and the need to attract and retain high-calibre professionals in this area. However, this dependency is typical of the IT industry and not exclusive to XTB.

The Group-wide wage gap takes on higher values because we compare the salaries of employees working in different markets around the world and in different countries, where the standards of remuneration for the same work are determined by geographically differentiated market standards. The standards of remuneration for the same work in different countries are clearly different, which is reflected in the gap presented.

The total remuneration ratio, which expresses the ratio of the highest earning person in the XTB Group to the median remuneration of all other employees in 2024, was recalculated in two variants:

- for the Head Office of XTB S.A., according to the ESRS standards formula where it reached 15,41 and
- simplified for the XTB Group, (the highest remuneration was compared to the median selected from among the medians provided by all XTB S.A. entities). The indicator for the XTB Group was in 2024: 15,53.

In 2024, we have made non-wage benefits available to Head Office employees, i.e.:

- private medical care;
- funding for the MyBenefit platform and the Multisport package;
- "Helping Hand" well-being platform providing psychological support, psycho-education and prevention (e.g. online sessions with therapists, webinars, workshops, educational articles);
- reimbursement of the cost of corrective glasses;
- Christmas vouchers;
- holiday surcharges;
- an allowance for the use of accrued leave during the calendar year;
- group life insurance;
- an additional day of paid leave for birthdays;
- an additional day of paid leave for care for young parents;
- days off for voluntary services;
- subsidised meals.

The scope and form of non-wage benefits in the subsidiaries are adapted to local conditions and standards in the area of employee remuneration and include, for example, additional medical benefits, group insurance or Christmas gifts. In addition to this, employees receive annual bonuses in the form of financial gratification according to established rules.

3.1.4. Training and development

S1-13 A suitably educated workforce is the foundation of the business, ensuring that duties are carried out in a professional manner. The XTB Group has a training policy based on an individual approach, tailoring development programmes to the current needs of employees and business objectives, and the principles of the training system are determined by the Procedure for Educational Training and Confirmation of Knowledge and Competence of Employees. The company offers support for education, including funding for training, courses, conferences, as well as studies, postgraduate studies and specialisation examinations such as the broker's licence or CIIA. The principles for granting subsidies are regulated by the XTB S.A. Training Policy.

An additional element of the training policy is support during the introduction of new employees. They have access to an internal knowledge base containing presentations and recordings about the industry and products offered by the company, which helps them start work quickly and effectively. Financial resources for training are an element of the budgets of individual XTB departments. In foreign branches, the training budget is set by the branch director. Employees are delegated to training by their direct superior, according to needs.

The main categories of external training include:

- technical training (in the IT area);
- specialised training (to enhance professional knowledge, including postgraduate studies, CFA, ACCA, MBA, ICA, stockbroker licence preparation course, etc.);
- soft skills training;
- language training (tuition grants, reimbursement of course fees, access to the eTutor online language learning platform).

Regular (quarterly or annual) employee evaluations take place at XTB S.A. branches and companies, which are carried out in order to:

- improve the quality and efficiency of the work of XTB employees;
- give feedback to the employee and build relationships;
- recognise and promote achievements;
- increase staff motivation;
- identify and analyse possible problems at the earliest possible stage;
- support rational staffing decisions and planning for individual employee career development.

The indicators regarding training and development and regular employee assessments refer exclusively to employees employed in the XTB Group as at 31.12.2024. Training hours do not include the time spent by employees on postgraduate studies, MBA and CFA courses (self-study), where a reliable estimate of training time is impossible. The list does not include access to e-learning platforms, where access to courses is unlimited in time; studies; language courses; courses preparing for obtaining a license, if access to the above courses was unlimited in time. Employees can use co-financing for access to e-learning platforms with unlimited time access - 5 people used this option in 2024. Additionally, the company supports the development of language skills by offering co-financing for English language courses for employees and Polish language courses for foreigners employed at the headquarters - 38 people used this support. In addition, the company provides access to a language learning platform: English (79 users), German (38 users) and Spanish (30 users). In 2024, all employees were provided with regular Security Awareness training and practical anti-phishing training.



Table 34. Training and skills development indicator by gender

As for 31.12.2024				
Average number of training hours per employee				
Hierarchical level	Woman	Man	Others	Not disclosed
Senior management and directors	16,30	9,07	0	0
Executives and managers	10,86	8,96	0	0
Other employees	7,23	6,44	0	0
Average number of training hour per employee	7,87	6,93	0	0

The average number of training hours per employee (without distinction based on gender and salary level) was 7.28 hours per employee across the XTB Group.

Table 35. Indicator on regular employee evaluation by gender

As for 31.12.2024				
Scheduled employee evaluations				
Hierarchical level	Woman	Man	Others	Not disclosed
Senior management and directors	10	45	0	0
Executives and managers	42	161	0	0
Other employees	597	1 169	0	0
Total	649	1 375	0	0
Completed employee evaluations				
Senior management and directors	11	42	0	0
Executives and managers	34	155	0	0
Other employees	584	1 147	0	0
Total	629	1 344	0	0

In 2024, there was no single, consistent method of employee evaluation in the XTB Group. Each branch and department had its own methodology, which was communicated to each employee upon commencement of work and each time during evaluation interviews as a reminder. In some departments, interviews are held annually, in others on a quarterly basis. This is dictated by the specifics of the work of a given organizational unit. Some interviews did not take place in 2024 as a result of their postponement to the next reporting year.

Table 36. Percentage of XTB Group employees who participated in regular performance reviews and career development by gender (as of 31.12.2024).

Employee evaluations	Women	Men	Other employees	Not disclosed
Senior management and directors	70,00%	60.00%	0	0
Managers, supervisors	66, 67%	78,31%	0	0
Other employees	74,42%	75.37%	0	0
Total	73.49%	74.70%	0	0

In 2024, a total of 754 out of 1,015 people in the XTB Group were subject to regular evaluation, which constitutes 74.29%. The percentage of people under regular evaluation by gender was similar: women 73.49%, men 74.7%.

Table 37. Number of work evaluations completed per employee (as of 31.12.2024)

Employee evaluations	Women	Men	Other employees	Not disclosed	Number of completed evaluations per employee
Senior management and directors	1,10	0,93	0	0	0,96
Managers, supervisors	0,94	1,87	0	0	1,59
Other employees	1,94	2,12	0	0	2,06

As of December 31, 2024, per employee of the XTB Group employed under an employment contract, an average of 2.06 employee assessments (per 1 employee) were completed in the year under review.

3.1.5. Policies and regulations

S1-1 / S1-2

Employees are key stakeholders in the XTB Group influencing the success of our business. Each year we survey employee satisfaction levels, and the feedback gathered is translated into actions aimed at the development of areas marked for improvement. Opinions are also collected by staff representatives, who then formulate proposals to the Management Board. In order to adequately manage the area of needs and employee well-being, we have implemented and monitor the effectiveness of policies, among others:

- Work regulations (including health and safety rules)
- XTB HR Policy
- Anti-mobbing and anti-discrimination policy
- XTB S.A.'s Diversity, Equal Treatment and Inclusive Culture Management Policy
- Remuneration Policy
- Training policy
- Human Resources Risk Management Procedure
- Recruitment and selection procedure
- Data protection security policy
- Remote working regulations

S1-1 MDR-P

Diversity, Equal Treatment and Inclusive Culture Management Policy

The Diversity, Equal Treatment and Inclusive Culture Management Policy (hereinafter: Diversity Policy, DEI Policy) was created in response to the identified influences, risks and opportunities indicating the area of equality and inclusion culture as important for our team

(reference to significant influences, opportunities and risks can be found in chapter 1.6. Statements). It organizes and indicates the most important directions of activities in the area of supporting and building a diverse and inclusive organization. The policy was adopted by a resolution of the Management Board of XTB S.A., and the Human Capital Management Department of the XTB Headquarters is responsible for its implementation. The document has been communicated and is known to employees.

As part of the DEI Policy, we commit to respecting all human rights recognized and defined in internationally recognized documents and to avoiding/minimizing the potential negative impact of its activities on human rights. We commit to complying with the provisions of all types of activities:

- The 10 principles of the UN Global Compact;
- The Universal Declaration of Human Rights;
- The UN Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The principles concerning fundamental rights at work contained in the 8 ILO Fundamental Conventions set out in the Declaration on Fundamental Principles and Rights at Work, including: respect for the freedom of association and collective bargaining; the right not to be subject to forced labour, child labour and discrimination in respect of employment and occupation.

In addition, we are committed to respecting the human rights of employees in business relationships and areas where it is justified, to engaging our affected stakeholders as part of improving or monitoring our approach to human rights. By affected stakeholders we mean people (e.g. company employees, representatives of local communities, etc.) on whom the XTB Group exerts or may exert a negative influence.



The goals of the DEI Policy are:

- **Promoting diversity:** by ensuring that all people employed at XTB, regardless of nationality, gender, sexual orientation, religion, age, family status or level of professional experience, are treated equally and with respect.
- **Equality in employment:** Recruitment processes and career development paths at XTB are based on professional competences and achievements, not personal characteristics.
- **Culture of inclusion:** At XTB, we strive to build an open work environment, in which everyone can freely express their views, experiences and needs.
- **Combating discrimination:** XTB does not tolerate any form of discrimination, mobbing or harassment based on age, gender, nationality, appearance, property and family status, degree of physical ability, sexual orientation, political or religious beliefs and views. Every employee has the right to feel safe and comfortable in the workplace. In the event of any violations, employees have the opportunity to report incidents in accordance with established procedures, also anonymously.

In addition, the Policy also defines rules of conduct based on respect and acceptance, equal pay, education and awareness, and refers to recruitment standards and the possibility of reporting violations. The Human Capital Management department is responsible for monitoring the effectiveness of the DEI Policy.

The remaining policies implemented in XTB were created before the double significance test and are not related to the identified significant impacts, opportunities and risks. They are related to and consistent with XTB's strategy and are intended to support effective human resources management through effective selection, support and retention of the team of employees and, among others:

- Employment planning and sourcing of employees with specific skills and professional potential.
- Supporting employees' identification with the organisation's goals and mission.
- Shaping attitudes in line with XTB standards.
- Ensuring professional stability, countering job turnover and retaining a highly qualified workforce.
- Supporting the development of the specialised skills needed to perform professional duties.
- Creating an incentive system based on attractive employment conditions, performance appraisal, transparent promotion and bonus rules.

MDR-T

All entities in the XTB Group are based on the provisions of the XTB S.A. Human Resources Policy. The Human Resources Management Department of XTB S.A. is responsible for monitoring and updating the policies. In 2024, in order to implement the goals of the ESG Strategy for 2024-2027, we implemented the Anti-Mobbing and Anti-Discrimination Policy.

The policies implemented in XTB are aimed at counteracting discrimination (including harassment), promoting equal opportunities and social inclusion and cover the reasons for discrimination such as gender, religion, nationality, age, disability, nationality, political beliefs, ethnic origin, sexual orientation, appearance, etc.

As part of the remedial actions, we commit to taking independent actions or cooperating in the scope of remedial actions for the benefit of affected stakeholders; cooperating in this scope with suppliers to remedy negative effects that are directly related to our activities, products or services; cooperating with judicial or extrajudicial mechanisms to ensure access to full remedial actions. We expect that suppliers cooperating with the XTB Group act in a manner that respects human rights and the provisions of the ILO Declaration on Fundamental Principles and Rights at Work and the areas regulated by this Declaration, including:

- respect for the freedom of association and collective bargaining;
- rights not to be subjected to forced labour, child labour and discrimination in employment and occupation.

These policies have been communicated to employees.



3.1.6. Work safety and comfort

S1-11 Social protection

XTB Group employees are covered by social protection under public schemes or any benefits offered by XTB against loss of income caused by:

- Disease
- Unemployment starting while employee is working at XTB
- Accident at work and acquired disability
- Parental leave
- Retirement

The exception is the XTB S.A. Sucursal em Portugal branch, where employees with less than 360 days of employment in the last 24 months are not covered by social protection against unemployment and are not entitled to unemployment benefits.

The XTB Group has not set indicators related to social protection to assess results and effectiveness in relation to significant impacts, opportunities and risks.

As part of disclosure S1-15, we have assumed that all employees of the XTB Group employed under an employment contract are entitled to exercise the right to the above-mentioned leave. Table no. 38 presents the percentage of employees who exercised this right in 2024 in accordance with the employment status as of 31.12.2024.

Table 38. Work-life balance indicators for employees

S1-15

Reporting period	01.01.2024 – 31.12.2024				
	Women	Men	Others	Not disclosed	Total
Percentage of employees entitled to parental leave	100%	100%	0	0	100,00%
Percentage of eligible employees who have taken parental leave	7,78%	5,24%	0	0	6,11%

3.1.7. Incidents and complaints related to human rights

S1-2 / S1-3

XTB has an internal "Anonymous Whistleblowing Procedure", which details the procedure for reporting actual or potential violations of the law, including violations of anti-money laundering and terrorist financing regulations, internal procedures and ethical standards. The procedure covers both employees and other persons performing activities for XTB, including XTB's suppliers. The internal procedure implements the obligations introduced by the Law of 14 June 2024 on the protection of whistleblowers and provides protection against retaliation.

Reporting is made via an electronic form available at: <https://www.xtb.com/pl/zawiadomienie>. The entities handling the reports, depending on their subject matter, are: Supervisory Inspector, MLRO (Money Laundering Reporting Officer), Management Board, Supervisory Board or members of these bodies.

In addition, employees can report any irregularities through direct contact with their superiors, to employee representatives or by contacting the Human Capital Management department. The whistleblowing procedure is reminded to employees via internal mailings from the Legal and Compliance department. The XTB Group assesses whether the solutions applied during the explanatory and corrective processes were effective and, in the course of periodic communications, reminds about the available methods of reporting irregularities.

S1-17 The XTB Group monitors the number of reported complaints relating to mobbing or discrimination and reports each year in its sustainability reporting. In 2024, there were no incidents of mobbing or harassment and no serious incidents were reported regarding respect for human rights. In one of the subsidiaries of the XTB Group, in the audited reporting period, proceedings were pending concerning discrimination, which ended with a settlement

in the first quarter of 2025. As a result of the settlement, XTB was obliged to pay £ 2,000, which in relation to the consolidated net profit of PLN 856,856,194.46 is a small per mille.

S1-4 / S1-5

The supreme authority for managing HR impacts, opportunities and risks is the Management Board of XTB S.A. and the directors at the head of the branches, subsidiaries and HR divisions. In relation to the identified material impacts, opportunities and risks, we have updated the ESG Strategy and identified objectives i.e.:

- updating the remuneration principles at XTB S.A. Head Office as well as measuring and monitoring the Gender Pay Gap indicator for the entire XTB Group;
- creating a safe and inclusive working environment for XTB Group employees;
- development of the educational and social activities of the XTB Foundation.

These objectives were based on the results of surveys, in-depth interviews and workshop meetings with representatives from different areas of XTB's business as part of the Double materiality assessment. The achievement of targets is overseen by the assigned target owners and the ESG Team.

Material impacts, opportunities and risks are managed with the help of the activities of the Human Capital Management team, which examines the needs and moods within the team, represents the employees to the Management Board and implements the specific actions of the HR area. In order to counteract significant negative impacts and mitigate risks in 2024 at XTB S.A.'s Head Office, we have implemented an Anti-Mobbing and Anti-Discrimination Policy and a Diversity Policy. We have also launched a competency survey process to support the unification and transparency of remuneration and bonus rules in the XTB Group. We aim to improve comfort and working conditions to reduce turnover or employee departures from XTB.

Scope of social bargaining and social dialogue

S1-8

The XTB Group provides full freedom of association and is open to dialogue with labour communities. In 2024, the only country with more than 50 employees, which is at least 10% of the total employment value, was Poland. There were no collective agreements in this branch - employee participation was 0%. In the case of social dialogue in the EEA area, 100% of employees of the Headquarters in Poland were represented by employee representatives (what represents 69% of total employment of XTB Group). In 2024, no agreement was concluded with employees on representation by the European Works Council (EWC), the Societas Europaea (SE) Works Council or the Societas Cooperativa Europaea (SCE) Works Council.



3.2. Consumers and end-users

Among the recipients of XTB's services and products we can indicate:

- individual clients who are our consumers and end-users, and
- institutional clients, i.e. companies and organisations using XTB solutions.

These are key XTB Group stakeholders with whom we identify mutual impact in our relationships. It is the recipients of our services and products that inspire our further product plans and motivate us to take on the challenges of growing the business. On the other hand, XTB's business influences clients through its strategy, business model and the services and products offered. We have been managing each other's impact for many years, building our experience and improving our standards of doing business.

3.2.1. Clients of XTB Group

XTB is targeting two segments:

- Retail: The retail activity of the XTB Group includes offering clients a universal and comprehensive investment application, thanks to which they can effectively manage their financial resources and use a variety of investment products.
- Institutional: In the institutional segment, we act, among other things, as a liquidity provider for institutional clients. We also offer technology so that they can offer their clients the opportunity to trade financial instruments under their own brand.

All consumers and institutional clients are covered by the disclosures under sustainability reporting. The XTB Group does not adversely affect the right to privacy, personal data protection or freedom of expression of its consumers. However, it manages and processes the data provided by them and in the event of a potential leak could be held liable for causing a negative impact. XTB consumers subject to significant impacts are dependent on accurate and accessible information regarding XTB's product or service to avoid potentially harmful use of the product or service and may be particularly susceptible to the effects of marketing and sales strategies. Consumers subject to significant impacts are not particularly vulnerable to health or privacy effects.

SBM-3 XTB's impact on consumers and end-users is related to:

- the use of XTB's technological solutions, i.e. the investment application and the investment platform, through which investors have the opportunity to invest the funds raised;
- advertising and marketing activities based on responsible marketing practices and
- ongoing educational activities to help our investors achieve their investment goals.

The identified needs of consumers and end-users, are in line with XTB's business model and business objectives, which provokes the continuous development of our portfolio of investment and financial products. We carry out advertising activities with well-known athletes to help us reach the widest possible audience, make our presence felt on social media and carry out educational activities to build client investment awareness. As a broker, we offer access to a variety of financial instruments, including those that carry particularly high investment risks, of which XTB clients are informed. Since 2016, XTB has organised a Masterclass Conference, which is attended by several thousand people every year.

As part of the Double materiality assessment carried out in 2024, we identified the impacts, opportunities and risks of the consumer cooperation area as described in Chapter 1 of the Statement.

SBM-2 / S4-2 / S4-4 / S4-5

In order to understand the perspective of our individual and institutional clients, we invited a selected sample with the highest active use of XTB's services to participate in a Double materiality assessment in 2024. This gave us an insight into their needs and complemented the results of the Survey, making it a complete and valuable source of information for the Company. We based the ESG Strategy 2023-2027, updated in July 2024, on this and the designated: mission, vision and strategic directions, with no specific targets set for managing impacts, risks and opportunities. The XTB Group, as a provider of investment products and services, influences clients through activities in the areas of: quality of communication, offer and documentation, level and availability of customer service, availability of communication channels with clients, educational materials and activities, decisions supported by analyses of client opinions and availability of information, which minimizes the possibility of negative potential impacts and risks. We monitor and assess the effectiveness of these activities and initiatives by analyzing the opinions of our clients available online, the level of interest in XTB services and through direct contact with our Customer Service department.

Strategic direction

We are committed to social sustainability by creating a safe and inspiring working environment, building sustainable social relationships, the expectations of our clients.

The XTB Group identifies necessary actions in response to actual or potential negative impacts on consumers through organized operational and management processes focused on their needs and preferences. The XTB Group's approach to taking action in relation to specific significant negative impacts on consumers is described in Chapter 1.6. Statements. The XTB Group ensures that processes enabling remedial action in the event of significant

negative impacts are available and effective as part of the breach reporting procedure, contact form and direct contact with customer service. Each report is processed with due diligence by dedicated persons with appropriate qualifications. In order to mitigate significant risks in this area resulting from XTB's impact on consumers and its dependence on consumers, the organization undertakes and monitors activities aimed at improving technology, developing transparent information processes and strengthening the security of XTB products. The Company intends to continue the activities undertaken in subsequent reporting periods and allocates appropriate human and material resources for this purpose. We are increasing employment and training additional experts in each area of our activity in order to ensure not only the appropriate quality of customer service, but also effective operational and management processes affecting the entire activity of XTB, which allows us to counteract negative impacts. The XTB Group has not adopted goals in this area.

For years, our Business Strategy, its objectives and business model have been based on the needs of our clients and the identified needs of societies in different regions of the world. Contact with XTB Group's clients takes place at every stage of the cooperation: from the initiation of dialogue with potential clients, through the establishment of the cooperation, service during the cooperation, education and ending the cooperation. A widely available source of information and for reporting problems and complaints is, in addition to the form available on the XTB product website, the XTB helpline and customer service department, which is available 24 hours a day, five days a week. Among other things, in order to improve the quality of dialogue with investors in 2023, we have established a strategic partnership with the Association of Individual Investors, which represents their interests and perspective. In addition, we analyse and improve our business based on feedback from our clients added within the evaluation of the xStation application or on websites and discussion forums. The opinions collected influence business decisions and impact management for XTB clients. The top structure responsible for managing relationships with clients is the Management Board of XTB S.A. and the directors responsible for the operational performance of the customer service teams subordinate to them.

The safety of our clients is our priority and we do not agree to compromise in this area. We see security in the perspective of:

- protection of our clients' personal data,
- digital security of our products,
- transparent and clear rules of cooperation with XTB,
- appropriate quality of customer service by qualified XTB experts,
- education to support investors in achieving their investment goals.

To ensure adequate security, we encrypt client data in accordance with proven and accepted industry standards. We carry out an internal GDPR audit process at least once a year. We regularly conduct independent security audits in line with the requirements of GDPR and ISO 27001, using recognised companies specialising in online security. Internal or external penetration tests are regularly scheduled. XTB has also implemented access management controls, including approval of access by Legal and Compliance to ensure that only authorised employees have access to data (in line with Need-to-Know and Least Privilege).

Employees receive cyber security training once a year, culminating in an exam, covering topics such as information security, data privacy and password security. Our physical infrastructure is supported by Data Centres providing the best industry standards such as physical security with secure access, intrusion alarms, CCTV, motion sensors, etc. located in different geographical regions. XTB also provides centralised monitoring for IT security, especially for malicious activity, vulnerabilities, incidents. For the security of clients, XTB always confirms requests to change personal data using multi-factor authentication mechanisms. We use a variety of contact channels (e-mail, SMS, telephone).

The XTB xStation mobile app allows authentication by password and additionally offers access security by code or biometrics. The application has multi-component authentication implemented.

During the reporting year, we did not record any serious human rights issues or incidents related to the value chain. For more information on impacts, opportunities and risks in the area of consumer relations, see Chapter 1.6. of the *Statement*.

3.2.2. Consumer and end-user policies

S4-1 The overarching documents at XTB are the business and ESG strategies. The umbrella sets our objectives and courses of action in line with publicly available standards of conduct such as e.g. UN Guiding Principles on Business and Human Rights, or the OECD Guidelines for Multinational Enterprises. The policies adopted at the XTB Group can be viewed from two perspectives: internal and external. In order to responsibly manage relationships and influence in the consumer area, we have implemented internal standards that also result from legal regulations imposed on XTB as a financial institution. The highest authority responsible for implementing the documents is the Management Board of XTB S.A.

These include policies and regulations on, among other things:

- improving our services and product management,
- data protection security, information security and cyber-security,
- risk management and business continuity,
- handling complaints and reporting irregularities,
- internal control and audit,
- ethics, conflicts of interest, anti-corruption and anti-bribery and money laundering.

We have not implemented a uniform policy addressing all significant sustainable development issues in the consumer area, but each significant topic is covered by an independent procedure. Issues related to human rights, which may be significant from the perspective of customers, constitute the basis of the ESG Strategy for 2024-2027 and the XTB S.A. Code of Ethics.

As a financial market entity, we are obliged to provide our clients with the necessary information presenting the principles of cooperation with XTB in a transparent manner. On our website you will find regulations and documents, the knowledge of which is necessary when signing an investment account agreement with XTB, among others:

- Regulations for the provision of services concerning the execution of orders for the purchase or sale of property rights and securities, maintenance of securities and property rights accounts and cash accounts by XTB S.A. (General Terms and Conditions)
- Order Execution Policy (key assumptions in line with the requirements of the European Union directives on markets in financial instruments, organisational requirements and operating conditions for investment firms and the terms defined for the purposes of those directives)
- Regulations for the preparation of general recommendations by XTB S.A. (Recommendation Regulations)
- Agreement for the Provision of Services by XTB S.A. together with annexes
- IKE agreement
- Declaration of Risk Awareness
- MiFID questionnaire
- Basic information about XTB S.A.
- Other (including applications and powers of attorney)

In addition, XTB clients have access to documents, i.e.:

- XTB S.A.'s Complaints Management Strategy
- Instructions for filing complaints

During the reporting period under review, there were no instances of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guiding Principles for Multinational Enterprises that concern consumers or end-users.

3.2.3. Notification channels and remedial action

S4-1 / S4-3

XTB has implemented a comprehensive complaints management process, which is designed to facilitate the reporting of complaints, the rapid analysis of claims and the effective remediation of any negative impact on consumers and end-users.

The main principles of this process are:

- Transparency: clients are provided with precise information on how to raise a complaint, information on the stage of the process and on the decision, with justification.
- Promptness: complaints are received and dealt promptly, in accordance with established time standards, in order to compensate clients for any loss or inconvenience as quickly as possible.
- Efficiency: the complaints process is designed to be efficient and to take into account not only the effects but also the causes of the problems, what allows to prevent them from recurring in the future.
- Consumer cooperation, based on proactive collaboration with the client to understand reported problems, expectations and remediation also of individual cases.

The XTB's complaints process is characterised by transparency; already at the contract conclusion stage, our clients can familiarise themselves with the provisions of the Brokerage Services Provision Regulations, which clearly describe the channels through which a complaint can be lodged, what a complaint should contain and the maximum time limit within which a response can be expected.

We have also included on our website:

- "Instructions on Filing a Complaint".
- "Complaints Management Strategy".

These documents comprehensively describe the complaints process, including the client's rights and obligations. Information on how to make a complaint is also available in the Education section of XTB's website. XTB clients have a choice of several channels through which they can make a complaint. These include:

- in person, at the premises – in writing and orally,
- by telephone via our helpline,
- by post – to the address of XTB's registered office,
- via an electronic form, available in the Investor Room.

One of the most flexible communication channels is electronic communication, available regardless of location and continuously monitored by XTB employees.

All complaints reported by clients are recorded in the CRM system and are given their unique identifier and status, which facilitates the monitoring of the report. The status is also visible in the Investor Room so that the client can keep track of their application. We do not tolerate or allow any form of discrimination or unequal treatment towards our customers who have filed a complaint, grievance or appeal.

The complaints process is a valuable resource for XTB, so the handling of a complaint is not the end of the process. In systematic cycles, reports and analyses are produced on the requests received from clients. This enables the company to determine the causes of the reports and to identify and implement appropriate remedial actions.

By sharing knowledge as to the reasons for the reports, the company is able to implement remedial measures in a timely and efficient manner. Once these are implemented, an assessment of effectiveness is made, the complaints process is monitored to ensure that the problem has been completely resolved and similar situations will not occur again.

XTB's clients can report by means of complaints any irregularities they have noticed or their concerns. In 2024, we received a total of 6816 complaints from consumers and end-users of the XTB Group, representing 0.5% of the total client volume of 1,361,564 as at 31.12.2024. Due to the nature of the services provided, the most common complaints in 2024 were related to including technical problems related to using the application or orders placed by our customers.



4. Governance

- 4.1 XTB Group characteristics
- 4.2 Administrative, management and supervisory bodies
 - 4.2.1 XTB S.A.'s Management Board and corporate bodies
 - 4.2.2 Supervisory Board of XTB S.A.
- 4.3 Corporate culture and business ethics
- 4.4 Risk management and internal control
- 4.5 Supplier relationship management
- 4.6 Due diligence statement

GOVERNANCE



4. Governance

4.1. XTB Group characteristics

XTB Group is an international provider of financial instruments trading products, services and technology solutions, and XTB S.A., which stands at its head, is one of the largest listed brokers building experience in the investment industry for over 20 years.

We specialise providing our clients with a universal investment application that allows them to effectively manage their financial resources and gives them access to a variety of investment products. In line with the emerging Mission and Vision, our business ambition is to offer a universal investment application providing the opportunity to invest online in anything, at any time and in any way. We build solutions to support investors in achieving their investment goals and provide factual assistance in the form of free materials and market analysis.

In 2016, we made our debut on the regulated market of the Stock Exchange and, due to our global brokerage business, our activities are subject to financial supervision in international financial markets, including, among others: KNF, FCA, DFSA, CySEC, Bappebti Indonesia and SCA.

XTB S.A. Capital Group is subject to supervision by specific regulatory supervision authorities and public administration bodies in the jurisdictions in which it operates. In Poland, conducting brokerage activities requires a permit from the Polish Financial Supervision Authority and is subject to many regulatory requirements. The Company is a brokerage house operating on the basis of a permit to conduct brokerage activities and is subject to regulatory supervision by the Polish Financial Supervision Authority.

Thanks to the principle of a single European passport resulting from the MiFID II Directive, the Company operates in the form of a branch on the basis and within the framework of the permit granted by the Polish Financial Supervision Authority in the following EU Member States: the Czech Republic, Spain, Slovakia, Romania, Germany, France and Portugal.

Material impacts, opportunities and risks of the management and corporate governance area identified in the 2024 *Double Materiality Assessment* can be found in Chapter 1.6. of the Statement.

4.2. Administrative, management and supervisory bodies

As of 31.12.2024, the XTB S.A. Capital Group consisted of the parent company XTB S.A. and its seven foreign branches, as well as the Group's 13 subsidiaries.

XTB S.A.'s activities are regulated by documents such as:

- Articles of Association of XTB S.A.
- Regulations of the Management Board
- Rules of Procedure of the Supervisory Board
- Rules of Procedure of the General Assembly

All of the aforementioned documents comprising the Company's governance are publicly available on the investor relations sub-page under the Governance tab at: [https:// ir.xtb.com/](https://ir.xtb.com/)

4.2.1. XTB S.A.'s Management Board and corporate bodies

GOV-1 Role of administrative, management and supervisory bodies

Management structure

The members of the Management Board are appointed and dismissed by the Supervisory Board for a joint term of three years. The number of members of the Management Board shall be determined by the Supervisory Board in the resolution appointing the members of the Management Board. A member of the Management Board may also be dismissed or suspended by a resolution of the General Assembly. The powers of the Management Board include the representation and management of the Company's affairs and all matters not reserved by law or the Company's Articles of Association to the competence of the General Assembly or the Supervisory Board. The Management Board makes decisions with the best interests of the Company in mind, drafts development strategies and defines its main business objectives.

Full professional biographies of the Management Board members, a description of their competences and information on the principles of operation of the Management Board of XTB S.A. can be found in the Corporate Governance section in the *Management Board Report of the XTB Group, Corporate Governance, chapter Statutory Bodies of XTB*



The Management Board of XTB S.A.

As of 31.12.2024 and at the date of publication of this Statement, the Management Board of the Company remained 100% independent with unchanged composition:

Table 39. Composition of the Management Board of XTB S.A. as of 31.12.2024 and as of the date of publication of the Statement.

NAME	FUNCTION	OPENING DATE OF THE FIRST TERM OF OFFICE	DATE OF EXPIRY OF THE CURRENT TERM OF OFFICE
Omar Arnaout	President of the Management Board	10.01.2017	01.07.2025
Filip Kaczmarzyk	Member of the Management Board	10.01.2017	01.07.2025
Paweł Szejko	Member of the Management Board	28.01.2015	01.07.2025
Jakub Kubacki	Member of the Management Board	10.07.2018	01.07.2025
Andrzej Przybylski	Member of the Management Board	01.05.2019	01.07.2025

The current composition of XTB S.A.'s Management Board was appointed on 2 June 2022 by a resolution of the Company's Supervisory Board on the appointment of the existing five-member composition of XTB S.A.'s Management Board for a new joint three-year term of office (from 1 July 2022 until the end of 1 July 2025).



During the reporting period under review, men made up 100% of XTB S.A.'s Management Board.

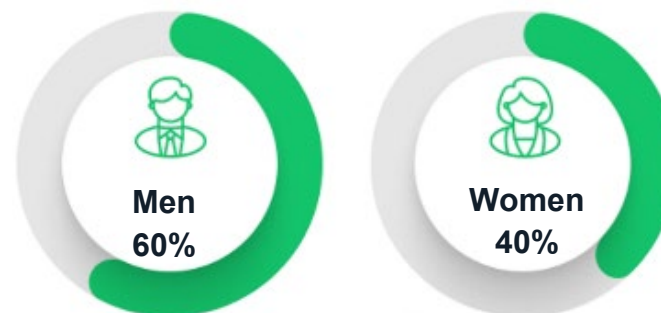
4.2.2. Supervisory Board of XTB S.A.

As of the day of publication, the composition of the Company's Supervisory Board was as follows:

Table 40. Composition of the Supervisory Board as at the date of publication of the Statement.

FULL NAME	FUNCTION	BEGINNING DATE OF THE CURRENT TERM OF OFFICE	DATE OF EXPIRY OF THE CURRENT TERM OF OFFICE
Aleksander Chłopecki	Chairman of the Supervisory Board	16.01.2025	20.11.2027
Ewa Stefaniak	Member of the Supervisory Board	20.11.2024	20.11.2027
Katarzyna Dąbrowska	Member of the Supervisory Board	20.11.2024	20.11.2027
Bartosz Zabłocki	Member of the Supervisory Board	20.11.2024	20.11.2027
Grzegorz Grabowicz	Member of the Supervisory Board	20.11.2024	20.11.2027

During the ongoing term of the Supervisory Board of XTB S.A., men made up 60% and women made up 40% of the Supervisory Board.



Changes in the composition of the Body in the reporting period, professional biographies and description of competences of the Supervisory Board members, information on their independence and information on the principles of operation of the Body can be found in the Corporate Governance section of the Management Board's Report, in chapter *Statutory Bodies of XTB*.

Committees of the Supervisory Board

The following committees function within the Supervisory Board:

- Audit Committee;
- Remuneration Committee;
- Committee for Risk Management.

The Supervisory Board performs the tasks of the Remuneration Committee and the Remuneration Committee for Risk Management by means of a resolution adopted by it collectively. Since 13 October 2017, the Audit Committee has operated as a separate committee. The Supervisory Board may also appoint other committees. Detailed tasks and rules for the appointment and operation of committees are set out in the Rules of Procedure of the Supervisory Board, available on XTB's website at: <https://ir.xtb.com/> under Governance, Regulations. Detailed info regarding the composition of the aforementioned committees can be found in the *Management Report of the XTB S.A. Capital Group*.

4.3. Corporate culture and business ethics

G1-1 XTB is a globally recognised brand. This brings a responsibility that calls for specific organisational and communication actions, affecting the relationship with our stakeholders and employees from all over the world. As an investment company, we operate in a highly regulated environment and it is fundamental for us to be compliant in the markets of our presence. This influences the shape, quality and standards of our diverse corporate culture.

The Management Board of XTB S.A. manages the elements of organisational culture in accordance with the division of competences of the Members of the Management Board in cooperation with the owners of XTB's operational areas. We are building an international and diverse organisational culture that requires appropriate communication activities. Accordingly, we have implemented an internal Intranet platform and communicate bilingually. The interests of the workforce are represented by employee representatives, who can present their findings and recommendations at regular meetings with the Management Board.

Corporate culture topics are discussed at Board meetings. In 2024, the following were discussed:

- the results of the XTB Group's Double Materiality Assessment,
- the adoption of the ESG Strategy 2024-2027,
- the adoption of an Anti-Mobbing and Anti-Discrimination Policy,
- the adoption of the Anti-Corruption Policy,
- the adoption of a Diversity & Inclusion (DEI) Policy.

We support the development of our corporate culture through:

- competitive and flexible terms and conditions of employment,
- values, strategy, procedures and policies,
- bilingual communication based on an internal intranet and mailings,
- company-wide and departmental team-building events,

- organising and subsidising employee training,
- communication activities under the Natural Investment Programme,
- promoting prevention and health-oriented habits through regular Health Day celebrations or ad hoc actions;
- year-round "Inner Power" workshops to encourage sharing of passions among employees,
- annual employee satisfaction survey;
- promotion of volunteering;
- support for diversity and the introduction of a Diversity Policy (DEI).

MDR-P Our activities in the area of corporate culture and ethics are supported by internal documents which include, among others:

- Articles of Association of XTB S.A.
- Regulations of the Management Board of XTB S.A.
- Code of Ethics,
- Diversity Policy (DEI)
- Anti-mobbing and anti-discrimination policy
- Training policy
- Anti-Corruption Policy
- Work Regulations
- HR Policy
- Remuneration Regulations of the Management Board of XTB S.A.

We build an organisational culture based on values:



TECHNOLOGY



SUPPORT



TRUST

We assess our organisational culture through an annual employee satisfaction survey conducted by the Human Capital Management Department

Tackling corruption and bribery

G1-3 / G1-4 To prevent, detect and respond to allegations and incidents of corruption and bribery:

- there is an Anti-Money Laundering team within the Legal and Compliance department and XTB Group employees receive training in the area of anti-money laundering and terrorist financing,
- XTB S.A.'s Anti-Corruption Policy was implemented,
- there are rules on accepting gifts and souvenirs;
- in accordance with the provisions of applicable law, conversations conducted with XTB clients are recorded.

In 2024, no cases of corruption were identified in the XTB Group, and there were no proceedings against XTB Group companies in this area.

G1-1 / MDR-P / MDR-A / MDR-P

Responding to the identified material impacts and risks in anti-corruption area and in line with the 2024-2027 ESG Strategy objective, the XTB S.A. Anti-Corruption Policy was developed and recommended for implementation across the XTB Group. The document is based, inter alia, on the United Nations Convention Against Corruption and addresses the issues comprehensively, and the whistleblowing system has been linked with the system implemented by the internal Whistleblowing Procedure to ensure efficient, independent and objective investigation of incidents. The highest level responsible for implementing the Policy is the Management Board of XTB S.A. The Policy does not implement any objectives; it is educational, informative and preventive in nature. It does not require taking action in the absence of violations, although it is subject to standard periodic review.

The Policy identifies areas particularly vulnerable to the risk of corruption:

- XTB customer service;
- IT area;
- selection of suppliers and business partners;
- the conclusion of commercial agreements;
- sponsorship and charitable activities;
- employment, remuneration and bonuses of employees;
- information processing, including confidential and business secret information;
- judicial and administrative decisions.

In Q4, XTB S.A. Head Office implemented anti-corruption and bribery training for newly hired employees and decided to send cyclical alerts to employees identified as vulnerable. These activities complement the AML (Anti-Money Laundering) training provided to date. Those identified as being at particular risk of corruption and bribery and members of management and supervisory bodies will be covered. The area of identification of vulnerable functions and training is a new area undertaken operationally by XTB and, as a result, many branches did

not carry out training exclusively dedicated to corruption, but only included elements of this topic as part of other, often mandatory training, e.g. in the area of AML.

Table 41. Training on anti-corruption and bribery

	Management Board and Supervisory Board)	Directors and managers	Other employees	Other persons cooperating on the basis of B2B contracts, contracts of mandate, etc.
Total number of people at risk of corruption	11	153	218	7
Number of people at risk and trained	1	25	42	3
Number of persons eligible for training	11	153	218	7
Percentage of people performing a function exposed to a risk of corruption covered by training programmes (%)*	9%	16%	19%	43%
Training time per 1 participant	1,55	0,84	0,32	2,43

*To calculate the percentage of people performing a function exposed to a risk of corruption covered by training programmes, the numerator, i.e. the number of people at risk and trained in this area, was divided by the denominator, i.e. the total number of people at risk of corruption.

In 2024, training conducted in the area of corruption had a form of mixed training: onsite, online and using online platforms.

To prevent, detect and respond to allegations and incidents of corruption and bribery:

- there is an Anti-Money Laundering team within the Legal and Compliance department and XTB Group employees receive training in the area of anti-money laundering and terrorist financing,
- XTB S.A.'s Anti-Corruption Policy was implemented,
- there are rules on accepting gifts and souvenirs;
- In accordance with the provisions of applicable law, conversations conducted with XTB clients are recorded,
- training including anti-corruption issues has been implemented into the training process of newly recruited employees from Q4 2024,
- a decision was taken to send cyclical alerts to both those identified as being at high risk of corruption and all employees.

In 2024, no cases of corruption were identified in the XTB Group, and there were no proceedings against XTB Group companies in this area.

Whistleblower mechanism

XTB has an internal "Anonymous Whistleblowing Procedure", which sets out the procedure for reporting actual or potential violations of the law, including violations of anti-money laundering and terrorist financing regulations, internal procedures and ethical standards. The procedure covers both employees and other persons performing activities for XTB, including XTB's suppliers. The internal procedure provides protection for whistleblowers against retaliation and implements the obligations introduced by the Law of 14 June 2024 on the protection of whistleblowers. Any employee who witnesses or has knowledge of a breach is obliged to make a report.

Applications are made via an electronic form available at <https://www.xtb.com/pl/zawiadomienie>. The entities handling the reports, depending on their subject matter, are: Supervisory Inspector, MLRO (Money Laundering Reporting Officer), Management Board, Supervisory Board or members of these bodies. Pursuant to the adopted *Whistleblower Procedure at XTB S.A. of 24.09.2024* it is assured that the investigators are to be separate from the chain of management structures involved in the case. Upon receipt of a notification, the competent entity shall initiate an investigation, which should take no longer than 2 months.

All reports from outside the internal structures concerning suspicions of corrupt activities of XTB should be submitted via the electronic form available at <https://www.xtb.com/pl/zawiadomienie>, or by correspondence to the registered office of XTB S.A. in Warsaw.

The report should contain at least the following information:

- date, place and circumstances of the incident;
- nature of the incident;
- evidence of a breach, such as documents, e-mails or other.

All submissions are treated as confidential and are stored in a dedicated submission register. An acknowledgement of receipt of the notification shall be given to the notifying person who provided contact details as part of the notification, within 14 working days from the date of notification. If the proceedings initiated as a result of the notification are terminated, the notifying person will also be informed of the termination and outcome of the proceedings, within one month from the date of termination. The people handling the report are separate from the management structures involved in the case.

Reporting the results of the investigation to the management and supervisory bodies under the Whistleblowing Procedure is the responsibility of the Member of the Management Board

for Legal Affairs who periodically reports to the Supervisory Board on the notifications received.

4.4. Risk management and internal control

GOV-5 In 2024, we undertook to organise our ESG management processes, identify material impacts, opportunities and risks, set strategic action steps for the coming years, analyse XTB S.A. Group's data capture process and align reporting with the requirements of the EU CSRD and ESRS standards.

The highest management authority with regard to risks of the ESG area is the Management Board of XTB S.A.. The ESG risks identified as part of the *Double Materiality Assessment* process in line with the 2024-2027 strategic objective have been aligned with the internal risk management system and will be incorporated into it. Experts representing various areas of XTB Group's operations and providing the necessary data for the reporting process are responsible for its completeness, reliability and accuracy. The organisational unit that coordinates the XTB Group's sustainability reporting process is the ESG Team, which collects, consolidates, analyses and presents the information gathered in the report. Each person required to support the reporting process by providing data is supported by the ESG Team, which remains at their disposal throughout the process. Data collection is based on universal and publicly available tools familiar to every XTB Group employee.

Supervision of the correctness of the reporting process is exercised personally by the Member of the Management Board for Finance and members of XTB S.A.'s Management Board. Also from 2025, the Internal Auditor representing XTB S.A.'s internal audit function will periodically review the published sustainability statements and audit the ESG area at least once every two years. The Internal Auditor reports organisationally to the President of the Management Board and functionally to the Chairman of the Audit Committee in accordance with the rules provided for in the Internal Audit Regulations. The tasks of the Internal Audit Department include examining and assessing the correctness and effectiveness of internal processes,

rules and procedures at XTB. The Internal Auditor also has an advisory role to other organisational units, including the unit responsible for risk management, ESG and reporting.

Within the structure of XTB S.A., there is also a Risk Control Department managed by the Member of the Management Board for Risk Management. Legal and compliance issues, on the other hand, are overseen by a legal team managed by the Board Member for Legal Affairs. The purpose of the XTB Risk Management System is to ensure informed and controlled risk-taking within the XTB Group. Risk management policies are developed to identify and measure the risks taken, as well as to mitigate them and set appropriate limits to reduce the scale of exposure to these risks.

Within the Supervisory Board, there is a Committee for Risk Management. The Company has also established an Audit Committee, which functions as a separate committee.

4.5. Supplier relationship management

G1-2 / G1-5 / G1-6

We aim to build long-term and stable relationships with our suppliers through communication and responsible payment practices. Despite analysis we have not found the key opportunities and risks of this area, which is caused by, among other things, the non-productive nature of our business and the business characteristics of the partners we work with (regulated institutions, partners from the European Union area). When selecting suppliers, we are guided by their good reputation in the market and assess our relationships on the basis of ongoing cooperation and contact; as of the date of publication of the Statement, we have not included environmental and social criteria in our assessment when selecting suppliers.

Supply chain risks and sustainability impacts are minimised, as we are not in a situation where we are dependent on one supplier or threatened by supply chain disruptions. Among suppliers, we mainly identify suppliers of IT infrastructure, office supplies and services (e.g. marketing and advertising).

The XTB Group has not adopted a policy regulating the rules of payment for suppliers, nor do we adjust payment terms depending on the type of supplier, and in the reporting period we did not take any significant actions or set any goals in this area. Payment terms are determined each time during individual negotiations of contractual provisions between XTB and suppliers. Despite the lack of procedures in the area of payments, also towards our SME sector partners, we adhere to the principle of the most effective settlement of liabilities, and in 2024, 78% of payments made on the scale of the XTB Group were made in accordance with the adopted payment standards.

G1-6 MDR-P

The XTB Group has not adopted a policy governing payment terms for suppliers, nor do we adjust payment terms according to supplier type as payment terms are determined during individual negotiations of contractual provisions between XTB and suppliers. Despite the lack of procedures in the area of payments, we adhere to the principle of paying our business partners as efficiently as possible, and as many as 78% of payments made at Group level were made in accordance with accepted payment standards.

Table 42. Standard payment rules at XTB Group in 2024

Reporting period	01.01.2024 – 31.12.2024
Average number of days needed to pay an invoice from the start of the contractual or statutory payment period	15
Number of pending legal proceedings for late payment	0
Standard payment terms (average number of days)	14
Number of payments made according to standard conditions	21 971
Total number of payments made	28 280
% of payments compliant with the standard payment conditions	78%

4.6. Due diligence statement

GOV-4

Pursuing sustainable business is a complex process that requires thoughtful actions spread over time across the XTB Group. Due diligence, as we understand it, is a series of continuous activities aimed at monitoring, improving and verifying the effectiveness of implemented solutions. The process is intended to accompany the business throughout its operations, supporting its growth by improving strategic and operational processes.

In all of its operations, the XTB Group is guided by the principles set out in the international United Nations (UN) Guiding Principles on Business and Human Rights and the OECD Guidelines for International Enterprises. As an entity listed on the Warsaw Stock Exchange and regulated on the largest financial markets, we operate in accordance

with the recommendations of the Polish Financial Supervision Authority and regulators on local markets. Therefore, we exercise due diligence in all processes, including the area of sustainable development.

Table 43. Basic elements of due diligence process

Basic element of due diligence	Area	Reference in the Sustainability Statement
Integrating Due Diligence into Corporate Governance, Strategy and Business Model	E, S, G	Chapter 1.3. Sustainability management
		Chapter 1.6. Material impacts, opportunities and risks
		Chapter 3.1. Our employees
		Chapter 3.2. Consumers and end-users
Collaboration with stakeholders that the entity influences	E, S, G	Chapter 1.3. Sustainability management
		Chapter 1.5. Key stakeholders
		Chapter 3.2. Consumers and end-users
		Chapter 1.6. Material impacts, opportunities and risks
		Chapter 2.1.1. The XTB's Group's climate policy
	E, S, G	Chapter 4.3. Corporate culture and ethics
		Chapter 4.5. Supplier relationship management
Identification and assessment of negative impacts on people and the environment		Chapter 1.6. Material impacts, opportunities and risks
		Chapter 3.1. Our employees
		Chapter 3.2. Consumers and end-users
Taking action to reduce identified negative		Chapter 2.1.1. The XTB's Group's climate policy

impacts on people
and the environment

Monitoring the effectiveness of these efforts and providing relevant information in this regard	E, S, G	Chapter 2.1.2. Fuel and energy consumption
		Chapter 2.1.3. Greenhouse gas emissions
		Chapter 3.1.5. Regulatory policies

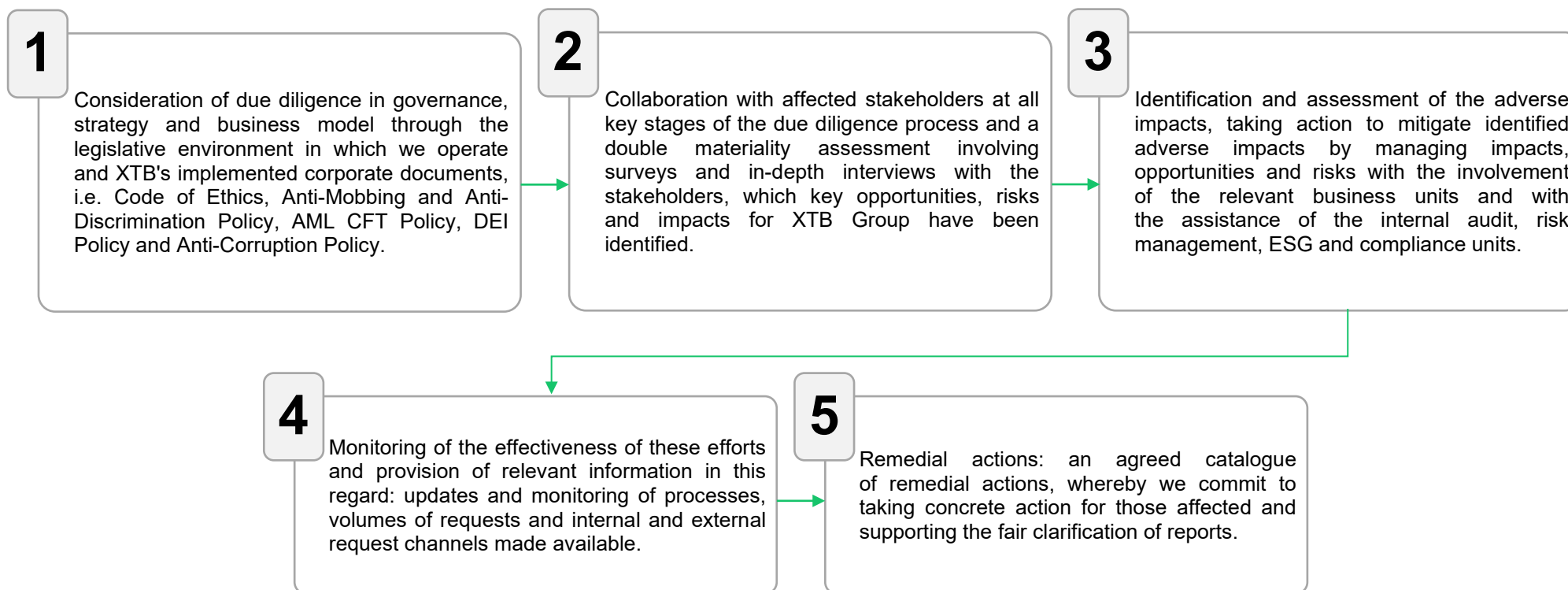
At the XTB Group, we have been implementing due diligence processes for years with the help of the Legal and Compliance department, which is partly driven by the nature of XTB's business as a financial institution listed on the Stock Exchange since 2016, but also by the need to develop the business as well as to build a responsible corporate culture and competitive advantage. We have been reporting non-financially since 2022, gradually building our awareness, getting our processes in order and achieving further milestones. The analyses and reports, the business and ESG strategy, the policies, codes and procedures implemented and the actions taken have helped us to carry out a Double materiality assessment at the beginning of 2024 and identify the key ESG impacts, opportunities and risks. We have reviewed the policies, identified areas for further improvement and the negative impacts we intend to manage and mitigate. In the next reporting periods, our will is to further improve the due diligence.

As part of our due diligence, our business is determined by:

- XTB Group's Business Strategy and ESG Strategy: the Business Strategy, together with the Sustainability Strategy, are key documents that are complementary to each other and determine XTB Group's activities. The objectives set complement each other, and support the embodiment of ESG criteria to even greater benefit of our Stakeholders.

- XTB Code of Ethics, Anti-Mobbing and Anti-Discrimination Policy, Diversity Policy, AML CFT Policy and Anti-Corruption Policy: these are the core umbrella documents of our business, which not only set out XTB operating principles, but also represent our commitment to uphold and support business ethics, improvement and the stigmatisation of fraudulent practices. We do not approve of any human rights violations, unethical behaviour and corruption or bribery.
- Internal and external whistleblowing procedure: We give our Stakeholders the opportunity to report any identified violations and irregularities putting at their disposal publicly available communication channels that also ensure full anonymity of the reporter. The whistleblower is placed under the statutory protection of a whistleblower, against whom any retaliation is prohibited.
- Other procedures, policies and instructions.

In line with the due diligence process, all corporate documents are subject to review and update and are publicly known and available among the XTB Group employees.



Annex 1. Scoreboards –Taxonomy

Table 44. Turnover rate.

2024	Year			Criteria for significant contribution						Criteria for the DNSH ("Do No Serious Harm") principle (h)						—	—	—	—
Economic activity (1)	Code or codes (a) (2)	Turnover (in PLN thousands) (3)	Part of turnover, 2024 (4)	Climate change mitigation (5)	Adaptation to climate change (6)	Water and marine resources (7)	Pollution (8)	Circular economy (9)	Biodiversity/ (10)	Mitigating climate change (11)	Adaptation to climate change (12)	Water and marine resources (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum guarantees (17)	Percentage of systematically compliant turnover, 2023 (18)	Category Support activities (19)	Category/ Transition activities (20)
Text		Currency	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	Y
A. ACTIVITIES ELIGIBLE FOR SYSTEMATISATION																			
A.1. Types of environmentally sustainable activities (consistent with the systematics)																			
Computer programming, IT consultancy and related activities	CCA 62	5 060,99	0,27%	N	Y	N	N	N	N	Y		Y	Y	Y	Y	Y	0,50%		

Turnover from environmentally sustainable activities (compatible with the systematics) (A.1)		5 060,99	0,27%		0,27%													
Including supporting																		
Including for the transition																		
A.2 Activities eligible for systematics but environmentally unsustainable (activities not aligned with systematics)																		
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL									
Data processing; website management (hosting) and related activities	63.11	1 265,25	0,07%	N/EL	EL	N/EL	N/EL	N/EL	N/EL									
Turnover from activities eligible for the systematics but not environmentally sustainable (activities not aligned with the systematics) (A.2)		1 265,25	0,07%		0,07%													

A. Turnover from activities eligible for the systematics (A.1+A.2)		6 326,24	0,34%		0,34%													
B. ACTIVITIES NON-ELIGIBLE FOR THE SYSTEMATICS																		
Turnover from the activities non-eligible for systematics		1 867 110,24	99,66%															
TOTAL		1 873 436,48	100,00%															

Table 45. Capital expenditure ratio.

2024	Year		Criteria for significant contribution							Criteria for the DNSH ("Do No Serious Harm") principle (h)							Minimum guarantees (17)	Share of activities aligned with the systematics (A.1.) or qualifying for systematics (A.2.)	Category Support activities (19)	Category Transition activities (20)
Text	Currency	%	Y; N; N/E	Y; N; N/E	Y; N; N/E	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E				Y
A. ACTIVITIES ELIGIBLE FOR SYSTEMATISATION																				
A.1. Types of environmentally sustainable activities (according to the systematics)																				
Computer programming, IT consultancy and related activities	CCA 62	4,82	0,02 %	N	Y	N	N	N	N	Y		Y	Y	Y	Y	Y	Y	0.11%		

Capital expenditures for environmentally sustainable activities (consistent with the systematics) (A.1)		4,82	0,02 %		0,02 %													
Including supporting																		
Including for the transition																		
A.2 Activities eligible for systematics but environmentally unsustainable (activities not aligned with systematics) (g)																		
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	E L; N/									
Data processing; website management (hosting) and related activities	63 .1 1	1,20	0,01 %	N/EL	EL	N/EL	N/EL	N/EL	N/EL									

Capital expenditures for activities eligible for the systematics but not environmentally sustainable (activities not aligned with the systematics) (A.2)		1,20	0,01 %		0,01 %														
A. Capital expenditure from eligible activities to systematics (A.1+A.2)		6,02	0,03 %		0,03 %														
B. ACTIVITIES NON-ELIGIBLE FOR THE SYSTEMATICS																			
Capital expenditure for non-systematic activities		20 654,87	99,97 %																
TOTAL		20 660,89	100,00 %																

Table 46. Operating expenditure ratio.

2024	Year			Criteria for significant contribution						Criteria for the DNSH ("Do No Serious Harm") principle (h)										
Economic activity (1)	Code or codes (a) (2)	Operating expenditure (in PLN thousands) (3)	Percentage of operating expenditure, year 2024 (4)	Climate change mitigation (5)	Adaptation to climate change (6)	Water and marine resources (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Mitigating climate change (11)	Adaptation to climate change (12)	Water and marine resources (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum guarantees (17)	Share of activities aligned with the systematics (A.1.) or systematics (A.1.) or systematics (A.1.)	Category Support activities (18)	Category/ Transition activities (20)	
Text		Currency	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	Y	
A. ACTIVITIES ELIGIBLE FOR SYSTEMATISATION																				
A.1. Types of environmentally sustainable activities (according to the systematics)																				
Computer programming, IT consultancy and related activities	CCA 62	4 907,36	0,55%	N	Y	N	N	N	N	Y		Y	Y	Y	Y	Y	1,13%			
Operating expenditure for environmentally sustainable activities (aligned with the systematics) (A.1)		4 907,36	0,55%		0,55%															
Including supporting																				
Including for the transition																				
A.2 Activities eligible for systematics but environmentally unsustainable (activities not aligned with systematics) (g)																				

				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL			
Data processing; website management (hosting) and related activities	63.11	1 226,84	0,14%	N/EL	EL	N/EL	N/EL	N/EL	N/EL			
Operational expenditure for activities eligible for systematics, but not environmentally sustainable (activities not aligned with the systematics) (A.2)		1 226,84	0,14%		0,14%							
A. Operating expenditure on activities eligible to systematics (A.1+A.2)		6 134,21	0,69%		0,69%							
B. ACTIVITIES NON-ELIGIBLE FOR THE SYSTEMATICS												
Operational expenditure for non-eligible activities for systematics		880 566,54	99,31%									
TOTAL		886 700,75	100.00%									

Table 47. Summary of key performance indicators to be disclosed by investment firms.

		Total environmentally sustainable assets - turnover ratio	Total environmentally sustainable assets – capital expenditure (CAPEX)	KPI – turnover rate	KPI – capital expenditure (CAPEX)	% coverage (in total assets)
Key performance indicator (for the purposes of proprietary trading)	Green asset indicator	0	0	0%	0%	0%
		Revenue from total environmentally sustainable activities and services - turnover ratio	Revenue from total environmentally sustainable activities and services – capital expenditure (CAPEX)	KPI – turnover rate	KPI – capital expenditure (CAPEX)	% coverage (in total revenue)
Key performance indicator (for services and activities of others)	Key performance indicator on revenue	0	0	0%	0%	0%

Table 48a. Key performance indicators for investment companies: services of trading for company's own account (revenues).

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	w	x	y	z			
		Total (PLN million)	Of which covered by key performance indicators (PLN million)																										
				Climate Change Mitigation (CCM)						Adapting to climate change			Water and marine resources (WMR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)				
				Of which EU systematics assets (%) (eligible for systematics)						Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)				
					Of which activities aligned with systematics (%) EU (%) (aligned with systematics)						Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			
							Of which for transition (%)	Of which supporting (%)				Of which supporting (%)					Of which supporting (%)				Of which supporting (%)					Of which supporting (%)			Of which for transition (%)
1.	Total assets invested as part of the business of investment companies making transactions on their own account*	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%			
2.	of which: on their own account	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%			
3.	of which: on clients' account	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%			

* excluding government bonds

Table 48b. Key performance indicators for investment companies: services of trading for company’s own account (CAPEX).

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	w	x	y	z
		Total (PLN million)	Of which covered by key performance indicators (PLN million)																							
				Climate Change Mitigation (CCM)				Adapting to climate change			Water and marine resources (WMR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
				Of which EU systematics assets (%) (eligible for systematics)				Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			
					Of which activities aligned with systematics (%) EU (%) (aligned with systematics)				Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)			Of which activities aligned with systematics (%) EU (%) (aligned with systematics)				Of which activities aligned with systematics (%) EU (%) (aligned with systematics)	
			Of which for transition (%)	Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which for transition (%)	Of which supporting (%)			
1.	Total assets invested as part of the business of investment companies making transactions on their own account*	694	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.	of which: on their own account	694	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.	of which: on clients' account	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

* excluding government bonds

Table 49. Scoreboard – key performance indicators of investment firms – other services.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q		r	s	t	u	w	x	y	z	
		Total (PLN million)	Of which covered by key performance indicators (PLN million)																									
				Climate Change Mitigation (CCM)				Adapting to climate change			Water and marine resources (WMR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					
				Including revenues (fees, commissions and other monetary benefits) from services and activities to the sectors covered by the EU systematics (%) (eligible for systematics)				Including revenues (fees, commissions and other monetary benefits) from services and activities to the sectors covered by the EU systematics (%) (eligible for systematics)			Including revenues (fees, commissions and other monetary benefits) from services and activities to the sectors covered by the EU systematics (%) (eligible for systematics)			Including revenues (fees, commissions and other monetary benefits) from services and activities to the sectors covered by the EU systematics (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Of which EU systematics assets (%) (eligible for systematics)			Including revenues (fees, commissions and other monetary benefits) from services and activities to the sectors covered by the EU systematics (%) (eligible for systematics)					
				Of which for activities and services related to the activities aligned with the systematics (%)					Of which activities aligned with systematics (%) EU (%) (aligned with systematics)				Of which activities aligned with systematics (%) EU (%) (aligned with systematics)				Of which activities aligned with systematics (%) EU (%) (aligned with systematics)				Of which activities aligned with systematics (%) EU (%) (aligned with systematics)				Of which activities aligned with systematics (%) EU (%) (aligned with systematics)		Of which activities aligned with systematics (%) EU (%) (aligned with systematics)	
						Of which for transition (%)	Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which supporting (%)			Of which for transition (%)	Of which supporting (%)		
1.	Income (i.e. fees, commissions, and other monetary benefits) from investments and activities and services other than transactions on company's own account	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%	0%	0%	
2.	Acceptance and transmission of orders in connection with one or more financial instruments	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%	0%	0%	
3.	Execution of orders on behalf of the client	15,74	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
4.	Portfolio management	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
5.	Investment consulting	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
6.	Underwriting of financial instruments or underwriting of financial instruments with a guarantee of assumption of issue	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	

7.	Underwriting of financial instruments without guarantee of assumption of issue	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8.	Operation of multilateral trading facilities	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9.	Operation of organised trading facilities	0	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Commission income relates to: recurring fees from institutional partners, regulatory commissions (i.e. for withdrawals below a threshold amount, the issuing of PITs, etc.), inactivity fees, for the transfer of client securities from/to another brokerage, custody fees for client securities.

The tables below refer to the ratio of total assets invested in the proprietary trading activities of investment firms and the ratio of revenues related to the execution of orders on behalf of clients.

Table 50. Activity related to nuclear energy and natural gas – scope of activities.

Activity related to nuclear energy		
1.	The company conducts, finances or has exposure to the research, development, demonstration and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste.	no
2.	The company constructs, finances or has exposure to the construction and safe operation of new nuclear facilities for the generation of electricity or process heat, including for district heating or industrial processes such as hydrogen production, as well as their safety upgrades using the best available technology.	no
3.	The company conducts, finances or has exposure to the safe operation of existing nuclear facilities for the generation of electricity or process heat, including for district heating or industrial processes such as hydrogen production, as well as their safety upgrades using the best available technology.	no
Activities related to natural gas		
4.	The company constructs, operates, finances or has exposure to the facilities for the generation of electricity using gaseous fossil fuels.	no
5.	The company constructs, modernises, operates, finances or has exposure to combined heat/cooling and electricity generation facilities using gaseous fossil fuels.	no
6.	The company constructs, modernises, operates, finances or has exposure to heat/cooling generation facilities using gaseous fossil fuels.	no

Table 51a. Nuclear and natural gas activities – economic activities in line with the systematics – revenues.

Row	Types of economic activity	Amount and share (information to be provided in monetary amounts and percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
2.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
3.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
4.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
5.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
6.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI.	0	0%	0	0%	0	0%
7.	Amount and share of other economic activities consistent with the taxonomy not included in rows 1–6 above in the denominator of the applicable KPI.	0	0%	0	0%	0	0%
8.	Overall applicable key performance indicator.	0	0%	0	0%	0	0%

Table 51b. Nuclear and natural gas related activities - economic activity in line with the systematics - by capital expenditure (CAPEX).

Row	Types of economic activity	Amount and share (information to be provided in monetary amounts and percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
2.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
3.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
4.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
5.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
6.	Amount and share of economic activities in line with the taxonomy referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI.	0	0%	0	0%	0	0%
7.	Amount and share of other economic activities consistent with the taxonomy not included in rows 1–6 above in the denominator of the applicable KPI.	0	0%	0	0%	0	0%
8.	Overall applicable key performance indicator.	0	0%	0	0%	0	0%

Table 52a. Nuclear and natural gas activities – economic activities in line with the systematics (numerator) – revenues.

Row	Types of economic activity	Amount and share (information to be provided in monetary amounts and percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of economic activity following the systematics referred to in Section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%
2.	Amount and share of economic activity following the systematics referred to in Section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%
3.	Amount and share of economic activity following the systematics referred to in Section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%
4.	Amount and share of economic activity following the systematics referred to in Section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%
5.	Amount and share of economic activity following the systematics referred to in Section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%
6.	Amount and share of economic activity following the systematics referred to in Section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
7.	Amount and share of other economic activities aligned with the systematics and not listed in rows 1-6 above in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%
8.	Total amount and total share of types of economic activity consistent with the taxonomy in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%

Table 52b. Nuclear and natural gas activities – economic activities aligned with the systematics (numerator) – CAPEX.

Row	Types of economic activity	Amount and share (information to be provided in monetary amounts and percentages)					
		CCM + CCA	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		
		Amount	%	Amount	%	Amount	%
1.	Amount and share of systematic economic activity, referred to in Section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
2.	Amount and share of economic activity aligned with the systematics referred to in Section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
3.	Amount and share of economic activity aligned with the systematics referred to in Section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
4.	Amount and share of economic activity aligned with the systematics referred to in Section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
5.	Amount and share of economic activity aligned with the systematics referred to in Section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
6.	Amount and share of economic activity aligned with the systematics referred to in Section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
7.	Amount and share of other systematic economic activities not listed in rows 1-6 above in the numerator of the applicable key performance indicator	0	0%	0	0%	0	0%
8.	Total amount and total share of economic activities aligned with the systematics in the numerator of the applicable key performance indicator.	0	0%	0	0%	0	0%

Table 53a. Nuclear and natural gas activities – economic activities that are eligible for the systematics but do not comply with the systematics – revenues.

Row	Types of economic activity	Amount and share (information to be provided in monetary amounts and percentages)					
		CCM + CCA	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		
		Amount	%	Amount	%	Amount	%
1.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
2.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
3.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
4.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
5.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
6.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%	0	0%	0	0%
7.	Amount and share of other economic activities eligible for the systematics, but not aligned with the systematics, not listed in rows 1-6 above in the denominator of the applicable key performance indicator	0	0%	0	0%	0	0%
8.	Total amount and total share of economic activities eligible for the systematics, but not aligned with the systematics in the denominator of the applicable key performance indicator	0	0%	0	0%	0	0%

Table 53b. Nuclear and natural gas activities – economic activities that are eligible for the systematics but do not comply with the systematics – CAPEX.

Row	Types of economic activity	Amount and share (information to be provided in monetary amounts and percentages)					
		CCM + CCA	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		
		Amount	%	Amount	%	Amount	%
1.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
2.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
3.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
4.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
5.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%	0	0%	0	0%
6.	Amount and share of economic activities eligible for the systematics, but not aligned with the systematics referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%	0	0%	0	0%
7.	Amount and share of other economic activities eligible for the systematics, but not aligned with the systematics, not listed in rows 1-6 above in the denominator of the applicable key performance indicator	0	0%	0	0%	0	0%
8.	Total amount and total share of economic activities eligible for the systematics, but not aligned with the systematics in the denominator of the applicable key performance indicator	0	0%	0	0%	0	0%

Table 54a. Non-systematic business activities – data for the indicator of total assets invested in the trading activities of investment firms on their own account – revenues.

Row	Types of economic activity	Amount (PLN million)	%
1.	Amount and share of the economic activity referred to in row 1 of template 1 which is an economic activity that is not eligible for the systematics according to section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
2.	Amount and share of the economic activity referred to in row 2 of template 1 which is an economic activity that that is not eligible for the systematics according to section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
3.	Amount and share of the economic activity referred to in row 3 of template 1 which is an economic activity that that is not eligible for the systematics according to Section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
4.	Amount and share of the economic activity referred to in row 4 of template 1 which is an economic activity that is not eligible for the systematics according to Section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
5.	Amount and share of the economic activity referred to in line 5 of template 1 which is an economic activity that is not eligible for the systematics according to Section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
6.	Amount and share of the economic activity referred to in line 6 of template 1 which is an economic activity that is not eligible for the systematics according to Section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
7.	Amount and share of other economic activities not eligible for the systematics that have not been listed in rows 1-6 above in the denominator of the applicable key performance indicator	0	0%
8.	Total amount and total share of economic activities is not eligible for the systematics in the denominator of the applicable key performance indicator	0	0%

Table 54b. Non-systematic business activities – data for the indicator of total assets invested in the trading activities of investment firms on their own account. – CAPEX.

Row	Types of economic activity	Amount (PLN million)	%
1.	Amount and share of the economic activity referred to in row 1 of template 1 which is an economic activity that is not eligible for the systematics according to section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	694,27	100%
2.	Amount and share of the economic activity referred to in row 2 of template 1 which is an economic activity that that is not eligible for the systematics according to section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	694,27	100%
3.	Amount and share of the economic activity referred to in row 3 of template 1 which is an economic activity that that is not eligible for the systematics according to Section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	694,27	100%
4.	Amount and share of the economic activity referred to in row 4 of template 1 which is an economic activity that is not eligible for the systematics according to Section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	694,27	100%
5.	Amount and share of the economic activity referred to in line 5 of template 1 which is an economic activity that is not eligible for the systematics according to Section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	694,27	100%
6.	Amount and share of the economic activity referred to in line 6 of template 1 which is an economic activity that is not eligible for the systematics according to Section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	694,27	100%
7.	Amount and share of other economic activities not eligible for the systematics that have not been listed in rows 1-6 above in the denominator of the applicable key performance indicator	694,27	100%
8.	Total amount and total share of economic activities is not eligible for the systematics in the denominator of the applicable key performance indicator	694,27	100%

Table 55a. Business activities not eligible for the systematics data for the Investment Firms Performance Indicator – other services. Commissions and fees related to the execution of orders on behalf of the client – revenues.

Row	Types of economic activity	Amount (PLN million)	%
1.	Amount and share of economic activity referred to in row 1 of template 1, which is an economic activity not eligible for the systematisation according to section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	15,74	100%
2.	Amount and share of economic activity referred to in row 2 of template 1, which is an economic activity that is not eligible for the systematics according to section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	15,74	100%
3.	Amount and share of economic activity referred to in row 3 of template 1, which is an economic activity not eligible for the systematisation according to section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	15,74	100%
4.	Amount and share of economic activity referred to in row 4 of template 1, which is an economic activity not eligible for the systematisation according to section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	15,74	100%
5.	Amount and share of economic activity referred to in row 5 of template 1, which is an economic activity not eligible for the systematics according to section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	15,74	100%
6.	Amount and share of economic activity referred to in row 6 of template 1, which is an economic activity not eligible for the systematics according to section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	15,74	100%
7.	Amount and share of other economic activities not eligible for systematics that have not been listed in rows 1-6 above in the denominator of the applicable key performance indicator.	15,74	100%
8.	Total amount and total share of economic activities not eligible for systematics in the denominator of the applicable key performance indicator.	15,74	100%

Table 55b. Business activities not eligible for the systematics data for the Investment Firms Performance Indicator – other services. Commissions and fees related to the execution of orders on behalf of the client – CAPEX.

Row	Types of economic activity	Amount (PLN million)	%
1.	Amount and share of economic activity referred to in row 1 of template 1, which is an economic activity not eligible for the systematisation according to section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%
2.	Amount and share of economic activity referred to in row 2 of template 1, which is an economic activity that is not eligible for the systematics according to section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%
3.	Amount and share of economic activity referred to in row 3 of template 1, which is an economic activity not eligible for the systematisation according to section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%
4.	Amount and share of economic activity referred to in row 4 of template 1, which is an economic activity not eligible for the systematisation according to section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%
5.	Amount and share of economic activity referred to in row 5 of template 1, which is an economic activity not eligible for the systematics according to section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%
6.	Amount and share of economic activity referred to in row 6 of template 1, which is an economic activity not eligible for the systematics according to section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	0	0%
7.	Amount and share of other economic activities not eligible for systematics that have not been listed in rows 1-6 above in the denominator of the applicable key performance indicator.	0	0%
8.	Total amount and total share of economic activities not eligible for systematics in the denominator of the applicable key performance indicator.	0	0%

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