

Gender Pay Gap Ratio of XTB S.A. HQ and XTB Group

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. 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.

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.

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	32,46%	31,84%
	Board		
	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	44,67%	44,62%
	Board		
	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

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

Average level of gross hourly wage of male employees

x 100

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.