

Gender Pay Gap Ratio of XTB S.A. Capital Group for 2025

Working conditions

The XTB Group applies market-based remuneration principles, aligning salaries with employee competence, commitment, and performance. Remuneration is consistent with local regulations in force in the countries where XTB operates.

We regularly analyze the remuneration levels of women and men in individual departments. If differences are identified, we consult with the unit's director and take corrective action if necessary. The XTB Group has not established indicators regarding adequate remuneration for assessing performance and effectiveness in relation to significant impacts, opportunities, and risks. In 2025, we modernized the existing HR department, creating a Talent Department with a dedicated team of remuneration experts. This department will be responsible for managing the pay gap within the XTB Group and centralizing remuneration processes. Additionally, the department has taken over the management of periodic, uniform employee evaluations across the Group to ensure consistent, fair, and transparent policies for all employees.

In the 2025 Statement, we are presenting information on equal pay indicators for the second time. In the year under review, the methodology for calculating the indicators remained unchanged compared to 2024, although these indicators were not subject to independent expert assessment, with the exception of limited assurance on sustainability.

The quality and completeness of the collected data have been improved and the method of presenting the results has been changed, which does not affect the year-on-year comparability of the data.

Just like in 2024, in 2025 the same assumptions were made:

- employees employed under employment contracts in branches and companies of the XTB Group as at December 31, 2025 were included
- the average hourly rate per employee was calculated based on the contractual sum of the basic salary and variable remuneration components paid in the period from January 1, 2025 to December 31, 2025,

The pay gap indicator was calculated according to the formula proposed in the ESRS:

$$\frac{\text{Average level of gross hourly wage of male employees} - \text{Average level of gross hourly wage of female employees}}{\text{Average level of gross hourly wage of male employees}} \times 100$$

The pay gap is an unadjusted, aggregated indicator influenced by the composition of the workforce and the remuneration structure across the Group. As a technology-enabled brokerage and finance group, remuneration results may be influenced by: the distribution of positions and the level of advancement, market prices for specialist skills, and eligibility for variable remuneration.

Key contextual factors that may influence the index include:

- job structure and seniority, including representation in management and specialist positions;
- pricing in the specialist market, reflecting competition for specific skill sets;
- variable pay dynamics, including entitlements and the distribution of performance-based pay within positions;
- the impact of multiple locations, where pay levels may reflect local market conditions in different countries.

Table 25. Consolidated gender pay gap of XTB Group for 2025 and 2024

| | 2025 | 2024 | 2025/2024 |
|---|--------|--------|-----------|
| Total remuneration (basic wage and variable wage) | 29,86% | 31,56% | -1,7 p.p. |

In 2025, the XTB Group recorded an average pay gap of 29.86%, with a median of 25.18% and quartiles indicating a larger gap towards the top of the pay distribution (see Table 26). Compared to 2024, the average total pay gap decreased by 1.7 percentage points. We are committed to implementing measures to reduce the pay gap, which reflects one of our strategic goals for 2024-2027. In 2025, a dedicated organizational unit was established within the Talent (HR) department to handle remuneration, and the process of harmonizing employee evaluation and remuneration standards across the XTB Group began. This will enable us to effectively manage the pay gap.

Table 26. Wage gap ratio of employees of XTB Group in 2025

| | Average | Lower quartile | Median | Upper quartile |
|---|---------|----------------|--------|----------------|
| Total remuneration (basic wage and variable wage) | 29,86% | 19,96% | 25,18% | 29,90% |

The median is lower than the mean, consistent with a distribution in which performance at higher salary levels has a stronger impact on the mean. Quartiles provide a snapshot of the distribution, indicating greater dispersion and a larger gap toward the top of the salary distribution.

Total remuneration

The total remuneration ratio expresses the ratio of the highest earner in the XTB Group to the median remuneration of other employees. In 2025, similarly to the pay gap indicator, the quality of data collected from XTB Group entities was also improved. As in 2024, the following assumptions were made for the calculation of the indicator in 2025:

- employees employed under employment contracts in branches and companies of the XTB Group as of December 31, 2025, were included.
- the average hourly rate per employee was calculated based on the contractual sum of base salary and variable remuneration components paid in the period from January 1, 2025 to December 31, 2025.

In 2025, the indicator decreased by 21.2% yoy, from 15.53 to 12.23, which means reducing the disproportion between the highest paid person in the XTB Group and the median remuneration of other employees.

Table 27. Total remuneration ratio of XTB Group in 2025 and 2024

| | 2025 | 2024 | 2025/2024 |
|--------------------------|-------|-------|-----------|
| Total remuneration ratio | 12,23 | 15,53 | -21,2% |