



Sustainability Statement

of the XTBS.A.
Capital Group

2025

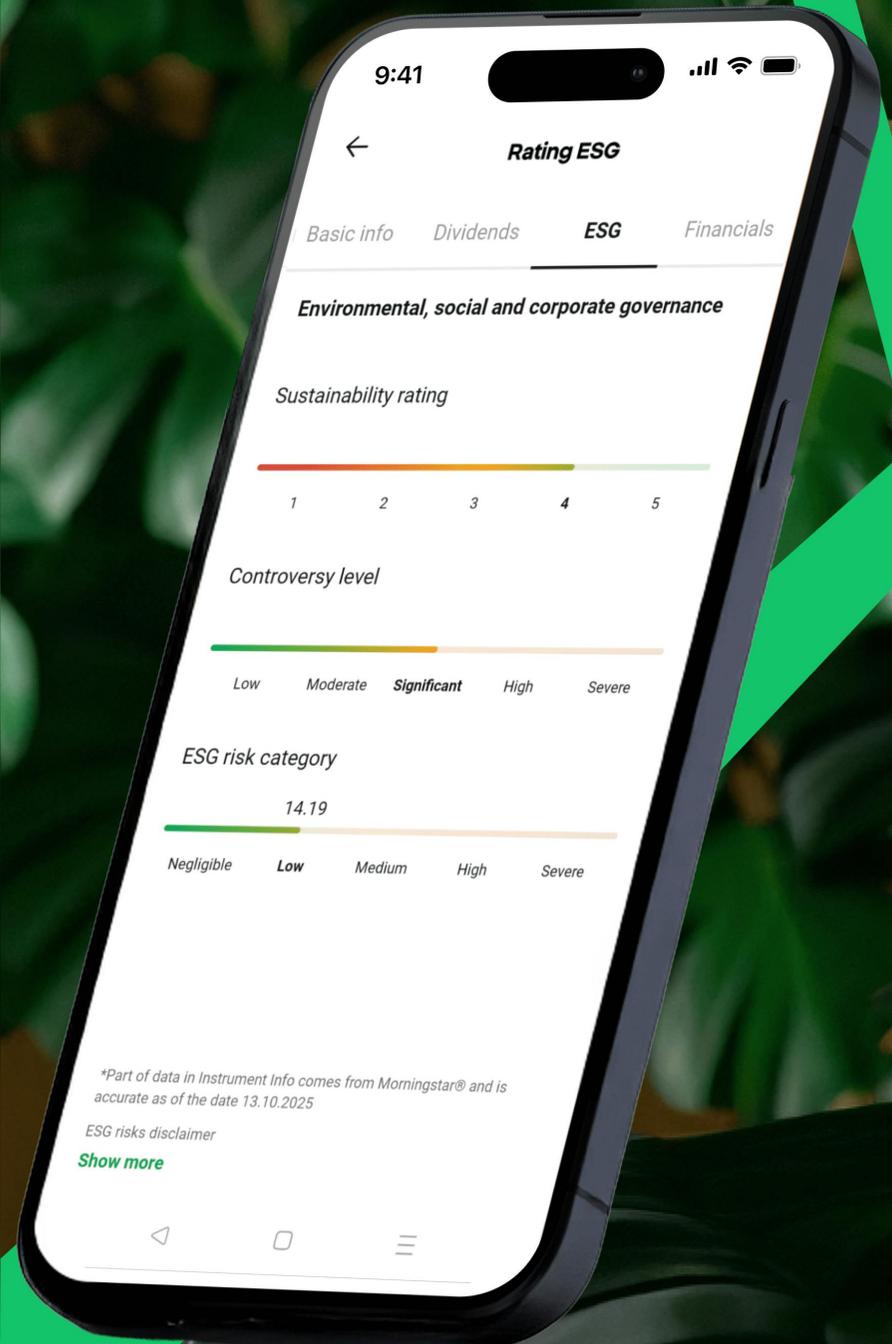


Table of contents

Letter from the Member of the Management Board

Key ESG 2025 events



1. General information

- 1.1 Basis for the sustainability statement
- 1.2 Management and supervision at XTB Group
- 1.3 Sustainability management
- 1.4 Strategy, business model and value chain
- 1.5 Key stakeholders
- 1.6 Material impacts, opportunities and risks
 - 1.6.1 Double Materiality Assessment
 - 1.6.2 Material impacts
 - 1.6.3 Material opportunities and risks
- 1.7 ESRS compliance tables



2. Environment

- 2.1 Climate change
 - 2.1.1 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 Financial Taxonomy
 - 2.2.2 Minimum Guarantees



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



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

Annex 1 - Taxonomy tables



Dear all,

we are pleased to present XTB Group's latest Sustainability Statement, which summarizes our activities implemented in 2025. As an organization operating at the intersection of technology and finance, we believe that long-term value is created when innovation goes hand in hand with care for people, the environment, and transparent management principles.

The past year was a time of intense growth for XTB, but also a time of reflection on the impact our activities have on the environment. Over 2.16 million people worldwide use the XTB investment app, so we prioritize security, a broad product offering, and financial education that supports responsible investing. The consistent expansion of our product offering, particularly in the long-term wealth building segment, has strengthened XTB's leading position in key European markets. In 2025, a record number of over 864,000 people joined our client base (+73.4% y/y). This is growth that cannot be ignored.

We believe that transparency and ethical management are the foundations of trust. That's why, in recent years, we have developed and updated our ESG Strategy through 2027, set our first strategic goals, and published our first CSRD-compliant report. You can also follow current information on all initiatives in this area on our new ESG website. In 2025, we focused on the quality and verification of reported data. All this translates into greater operational efficiency and more effective risk

management. At the same time, we recognize that building a sustainable development environment is a long-term process that requires time and consistency.

The ambition for continuous improvement, which is the driving force behind XTB, also means a willingness to take on new challenges. In 2025, we began the process of strengthening our organizational culture, whose key elements are accountability, development through technology, and efficiency. We standardized a quarterly evaluation system based on transparent, consistent principles and shared goals.

The year 2025 also marks the continuation of important initiatives supporting the engagement of our employees across all offices. Participation in the "2 Hours for Family" campaign and annual preventive health screenings as part of the "Pink October" and "Movember" initiatives have become a tradition at XTB. Sports activities are becoming increasingly popular, with nearly 100 people participating in Praska 5 and the Warsaw Night Half Marathon. We are pleased with the growing involvement of our companies and international branches – one example is our team's participation in a beach cleanup and tree planting campaign in Cyprus to restore the local ecosystem affected by the fires. The XTB Foundation, in turn, developed long-term partnerships for youth financial education, implementing, among other initiatives, another edition of the "Academy of Tomorrow." The Foundation also engaged in activities to help Polish entrepreneurs in flood-affected areas as part of the "Postcards from the Flood" campaign.

Our efforts have also been recognized by the market – four XTB good practices were included in the latest publication of the Responsible Business Forum. We also received the title of ESG Company 2024 at the Invest Cuffs conference.

This distinction confirms that consistency, commitment and transparency deliver tangible results and build credibility in the eyes of stakeholders.

I invite you to read the report, which serves not only as a summary of our activities in 2025 but also as a commitment to continued work. We are proud to be building the technological future of finance together in a responsible and sustainable manner.

Paweł Szejko

Member of the Management Board
for Finance

Highlights of 2025:

Publication of the XTB Group's first CSRD-compliant Sustainability Statement

XTB named Best ESG Company at Invest Cuffs 2025

XTB recognised among the best employers by WPROST

Launch of XTB's First ESG Service

XTB joined the "2 Hours for Family" initiative once again

XTB Volunteers participated in the "Clean River" initiative

XTB Foundation contributed to the "Postcards from the Flood" campaign

XTB's good practices featured in the Responsible Business Forum Report

XTB achieves Great Place to Work Certification

XTB partnered with and participated in the 10th Wizz Air Prague Night Half Marathon and the Prague 5K Run 2025

The XTB Foundation launches "Academy of Tomorrow: Finance with Class 2.0"

XTB recognized in the "2 Hours for Family" campaign

First aid training, annual flu vaccinations, and preventive health check-ups at XTB Headquarters

October marks Cybersecurity Month at XTB

Introduction of a standardized quarterly performance assessment system for XTB Group Employees

XTB awarded "Capital Market Heroes" for the Best Dividend Policy



1. General information

- 1.1 Basis for the Sustainability Statement
- 1.2 Group management and supervision
- 1.3 Sustainability management
- 1.4 Strategy, business model and value chain
- 1.5 Key stakeholders
- 1.6 Material impacts, opportunities and risks
 - 1.6.1 Double Materiality Assessment
 - 1.6.2 Material impacts
 - 1.6.3 Material opportunities and risks
- 1.7 ESRS compliance tables

General Information



9:41



Investment plan



5 304.19 EUR

Profit: **+0.13 (+0.05%)**



Travel

Value
622.19



New car

Value
4267.50



New books

Investment Plan is empty

Top it up

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 2025 to 31 December 2025 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 2025 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, the XTB Group has decided to omit the information specified in the Regulation in accordance with the transitional periods contained therein and based on the so-called "Quick-Fix" amendments introduced by Delegated Regulation (EU) 2025/1416, published in the Official Journal of the EU on 10 November 2025 and effective from 13 November 2025. Information on the omissions made has been disclosed along with the individual thematic areas of the ESRS.

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 primary 2025 Double materiality assessment and its update in 2025.

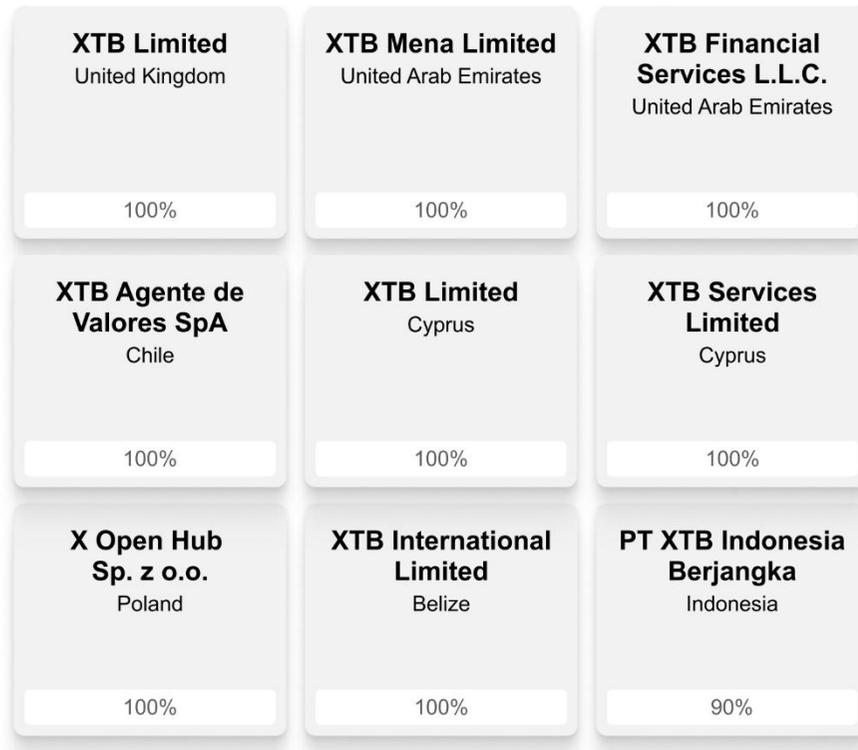
Reporting boundaries

The statement presents information for the period from 1 January 2025 to 31 December 2025. As of 31.12.2025, 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, which is not consolidated under the Statement, but is a key entity for XTB's sustainability area. 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.



In our Sustainability Statement, the following were consolidated:

Companies XTB S.A.



Branches XTB S.A.



Comparability of data, changes in preparation or presentation

BP-2 In 2025, the method of collecting, aggregating, and presenting data did not change compared to 2024, except of recalculation of greenhouse gas emissions for 2024 ([chapter 2.1.3. Greenhouse gas emissions](#)).

Where data cannot be obtained for calculating the XTB Group's greenhouse gas emissions, an estimation method was used, as described in chapter [2.1.3. 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.

Managing the sustainability reporting process

GOV-5 The Sustainability Team, a unit of the Finance, Accounting, and Administration Department of XTB S.A., is responsible for preparing the XTB Group's annual sustainability statement. The team's location within the finance department is deliberate, promoting consistency and integrity of the process with the Group's financial reporting. The non-financial reporting project is managed by the Sustainability Manager, who engages appropriate organizational resources, is responsible for collecting and analyzing data from all organizational units within the Group, and collaborates closely with the advisor and auditor. Progress, opportunities, and challenges are reported on an ongoing basis to the Management Board Member for Finance, who is the highest decision-making authority and the Management Board's representative in the process.

Like any area, non-financial reporting also carries both opportunities and risks. In 2024, during the XTB Group's double materiality assessment, we identified an opportunity resulting from the possibility of improving the quality of reporting, which could translate into building valuable relationships with XTB Group stakeholders, as well as legal and reporting risks that could materialize if the Group fails to adapt to the highly volatile legislative environment in this area and fails to properly fulfill its reporting obligations. We mitigate the identified risks by conducting the earliest and most comprehensive preparations possible, monitoring legislative changes, collaborating with qualified employees and external advisors, conducting training, and working closely with the auditor. The first link collecting and verifying the completeness and accuracy of data are named employees of subsidiaries, branches and departments of XTB S.A. Their ongoing contact with the Sustainable Development Team during the reporting process is aimed at timely delivery of appropriate quality data, audit evidence and responses to inquiries from the Team, advisor or auditor. The second link in data verification is the Sustainability Team, which consolidates data from individual units and verifies it. This data is then accompanied by sustainability certification, which is also a valuable stage of verification that minimizes risk. In the area of carbon footprint calculations, an external advisor, the Climate & Strategy Foundation, provides an additional link ensuring the reliability and accuracy of the calculations.

1.2. Management and supervision at XTB Group

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. In 2025, there was a change in the composition of the XTB S.A. Management Board: Mr. Andrzej Przybylski, previously responsible for the Risk Control Department, resigned from his position as a Management Board Member. As of 1.12.2025, Mr. Bartosz Osiński took over as Management Board Member for Risk. More information can be found in Chapter [4.2.1. Management Board of XTB S.A. and company bodies](#) of the Statement. 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* chapter 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. Among the Management Board members, Paweł Szejko, the Management Board Member for Finance, has been delegated direct management and oversight, as reflected in the Internal Regulations of the Finance, Accounting, and Administration Department. This ensures the consistency and integrity of non-financial reporting and financial reporting by managing both

areas by a single person. Sustainability management is described in more detail in subsection 1.3 of this Statement.

Members of the Management Board have the opportunity to expand their knowledge in the area of sustainable development through training, the general expertise of the Sustainable Development Team, and the knowledge and experience of external experts in the area of greenhouse gas emission management and calculation.

As part of the 2025 competency development program:

- The Management Board Member for Finance completed two courses on sustainability reporting standards, requirements and application examples, and sustainability reporting and analysis, conducted by the Education Center of the Polish Chamber of Statutory Auditors.
- One of the members of the Supervisory Board of XTB S.A. completed ACCA training entitled "ESG in Finance. Due Diligence in Reporting Environmental Topics in ESRs."

As of the Statement's publication date, the Management Board of XTB S.A. remained unchanged:

Omar Arnaout - CFO of the Management Board



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.

Filip Kaczmarzyk - Member of the Management Board



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.

Paweł Szejko - Member of the Management Board



Key management competencies 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,
- CSR activities (XTB Foundation).

Bartosz Osiński - Member of the Management Board



Key management competencies 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.

Jakub Kubacki - Member of the Management Board



Key management competencies 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. The members of the body carry out this obligation collegially, combining comprehensive competences and professional experience to supervise the area. The CVs and changes in the composition of the Supervisory Board in 2025 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:



Aleksander Chłopecki – Chairman of the Supervisory Board

Key competencies:

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



Jakub Zabłocki – Member of the Supervisory Board

Key competencies:

- economy, finance and investment,
- management and marketing



Ewa Stefaniak – Member of the Supervisory Board

Key competencies:

- accounting and controlling.



Katarzyna Dąbrowska – Member of the Supervisory Board

Key competencies:

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



Bartosz Zabłocki – Member of the Supervisory Board

Key competencies:

- compliance and legal,
- governance.



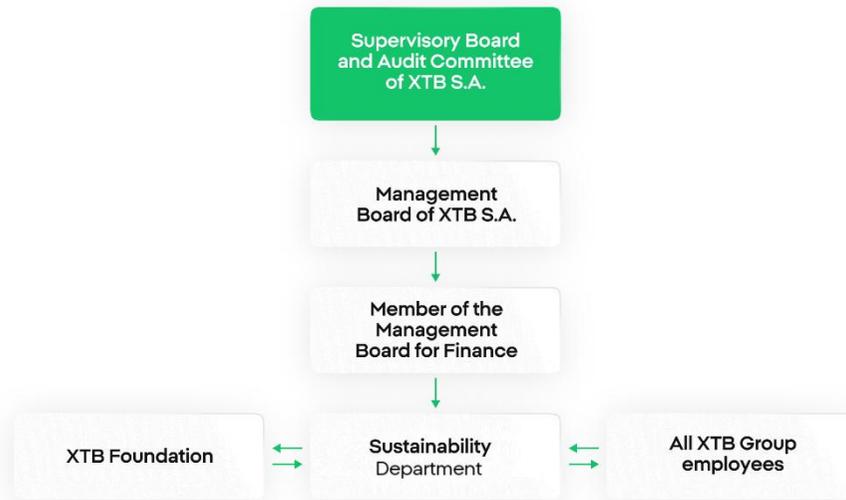
Grzegorz Grabowicz – Member of the Supervisory Board

Key competencies:

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

1.3. Sustainability management

Governance and supervision structure of the sustainability area



GOV-2 The highest authority managing sustainable development is the Management Board of XTB S.A., represented in this area by Paweł Szejko, Member of the Management Board for Finance, delegated to manage the Sustainable Development Department and Team. He regularly monitors the operational work of the area, consults with, and presents its activities to other members of the body.

In 2025, two teams were established within the Department: the Sustainability Team, responsible for, among other things, ESG development at XTB, ESG reporting and implementation of the ESG Strategy, and the Social Projects Team, implementing pro-employee and pro-environmental activities as well as financial education in line with the XTB business model and the XTB Foundation.

In an effort to integrate sustainability into XTB's operational and strategic activities, environmental, management and social criteria are in the attention of the Management Board during ongoing management activities. Sustainability and impact management topics are addressed at Board meetings as required. As part of the reporting period, at the beginning of 2026, a Management Board meeting was held to summarize the ESG activities implemented in 2025.

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

- during regular meetings between the Sustainability Manager and the Management Board Member responsible for Finance
- as part of meetings of the XTB S.A. Management Board, as needed
- during quarterly meetings of the XTB S.A. Audit Committee, which oversees the area of sustainable development.

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

The Management Board of XTB S.A.	Supervisory Board of XTB S.A.
Settles directions, priorities and objectives for the area of sustainability.	Supervises of the development direction, priorities and objectives for the area of sustainability.
Approves and supervises of the work of the sustainability area.	Supervises the sustainability reporting process.
Ensures sustainability reporting compliance with legal requirements.	Monitors XTB's sustainability activities.
Adopts and monitors 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.
Approves 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 2025 and up to the date of publication:

- members of XTB S.A.'s Management Board approved updated results of the *Double Materiality Assessment*;
- 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;
- the member of the Management Board for Finance received trainings to improve his competences in the area of sustainability;
- the Sustainability Manager conducted quarterly reviews of the area during the XTB S.A. Audit Committee meetings, summarizing, among others, ESG activities in 2025 and the updated results of the Double materiality assessment.

GOV-3 Incentive programmes for Company bodies

In 2025, the practice implemented in 2024 of linking the variable part of the remuneration of members of the Management Board of XTB S.A. to the implementation of the ESG Strategy for 2024-2027 was continued. In addition to the above, members of the Management Board and Supervisory Board of XTB S.A. are not granted financial incentives related to sustainable development issues.

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 universal investment 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 is achieved through our key technology product, an investment app, which helps 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 of the first choice, 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 and Vision

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.

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.

Values



Support

We support the implementation of our clients' investment plans with a universal investment application, a constantly growing portfolio of investment products, expert knowledge, and training for effective investing. We ensure the well-being of our team by offering attractive employment conditions, training, and a benefits package, among other benefits. We build XTB's value through responsible management and a well-thought-out dividend policy, creating long-term value for our shareholders.



Technology

Technology is a key element of investing through XTB. We are constantly developing our solutions and improving our investment offerings. We develop the skills of our employees, and our strength lies in the diversity and professionalism of our teams. We create a modern, innovative investment environment in which technology is the foundation of the highest quality service.



Trust

The foundation of XTB's operations is the trust of our clients and employees, which we build on responsible business actions and decisions, transparent communication, the quality of our solutions, and our presence in an industry characterized by a high level of supervision and regulation.

Sustainability as part of our business strategy

A responsible and modern business incorporates ESG criteria into its operational and strategic activities. As a dynamically developing FinTech that understands the definition of innovation, we recognize the need to incorporate sustainable activities into the achievement of business goals and integrate both areas in line with our mission and vision. We began our journey in 2021 with the development of the first ESG Strategy, updated by the Sustainability Team in 2024 and consistently implemented with a strategic perspective until 2027. Responsible practices allow us to achieve the adopted strategic business goals of the XTBS Group, as follows:

Sustainable actions:

- 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

Business goals of the XTBS Group:



We are strengthening our operations in the markets of Central, Eastern 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.

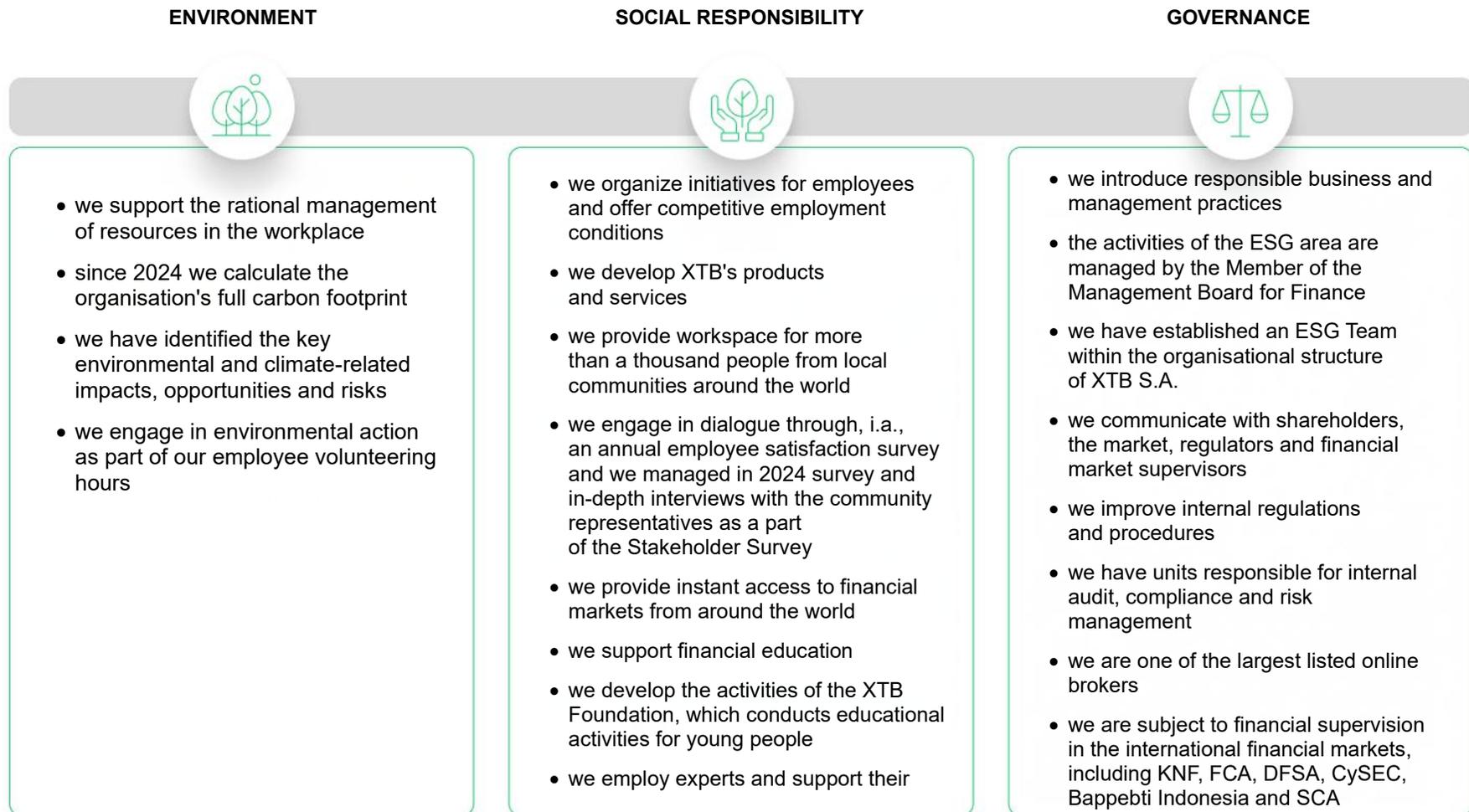


We are expanding the Group's range of products and services and developing new technologies



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

Activities in the area of the three pillars of sustainability



We complete ESG Strategy for 2024-2027

Dialogue with stakeholders as part of the double materiality assessment, survey research, in-depth interviews and workshops became the basis for the ESG Group's strategic directions and goals for 2024–2027.

ENVIRONMENT AND CLIMATE AREA

STRATEGIC DIRECTION

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 updated the material impacts, opportunities and risks of the environment and climate area
- we acted in accordance with the Climate Policy adopted in 2024
- we organised training for XTB HQ employees on greenhouse gas emissions
- for the first time we calculated and published XTB Group's full carbon footprint

- we monitored the generated municipal waste and electronic waste even more precisely thanks to the scale system introduced at the XTB HQ by the building manager
- we complied with the markings in the office space implemented in 2024, reminding employees about the rational management of resources
- we carried out educational mailings as a part of the "Natural Investment" programme and we strengthened our internal communications with the xPress newsletter
- we organized campaigns: cleaning the banks of the Narew River near Warsaw, participated in beach cleanups and tree planting events in Cyprus, and for the second time collected e-waste and batteries together with Elektroeko and UNEP/GRID Warsaw

AREA OF SOCIAL RESPONSIBILITY

STRATEGIC DIRECTION

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 updated identified material impacts, opportunities and risks of the social area
- we implemented first ESG online service to be even closer to our stakeholders

- we implemented unified standards of employee' quarterly performance evaluation in favour of unified remuneration policy for XTB Group employees
- we expanded and strengthened the structure of the Talent Department (previously HR Department) to introduce a high-performance culture
- we held elections for employee representatives and selected new representatives for the next term of office
- for the second time, we identified and published the pay gap for the entire XTB Capital Group
- we provided a space for our employees to share their passions at the "Inner Power" workshops
- for once again organised preventive examinations and consultations for employees celebrating annual Health Day at XTB
- 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 second time all Group companies participated
- we organised internal first aid training and safety day for our employees
- we organized DEI workshop (Diversity, Equity and Inclusion)
- together with XTB Foundation, XTB undertook initiatives such as supporting entrepreneurs from flood-affected areas (the "Postcards from the Flood" campaign) and participate in the "Noble Gift" ("Szlachetna Paczka) action
- XTB Foundation continued its educational activities as part of its partnership with the "Trampki na Gieldzie" Foundation and engaged in the creation of educational programs for high school students
- the XTB Talents team once again conducted a satisfaction survey among employees across the XTB Group
- we organised an additional employee satisfaction survey and received the "Great Place to Work" certificate for the HQ and the German branch of XTB S.A.

- we strengthened internal communication by implementing the xPress newsletter for employees and quarterly "Town Hall" meetings

MANAGEMENT AREA

STRATEGIC DIRECTION

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 reviewed the significant impacts, opportunities, and risks of corporate governance and identified cybersecurity risk
- we introduced two-factor authentication (2FA) for our clients
- we launched the first cybersecurity landing page: <https://en.xtb.com/cybersecurity>
- we conducted anti-corruption training for members of XTB S.A.'s governing bodies
- we updated XTB's investor relations website: <https://ir.xtb.com/en/>
- we expanded our product portfolio with new products
- we aligned the sustainability reporting process with ESRS standards and published the first statement compliant with CSRD
- we expanded the ESG structure by creating two teams in the Sustainability Department
- we implemented ESG risks into XTB S.A.'s internal risk management system

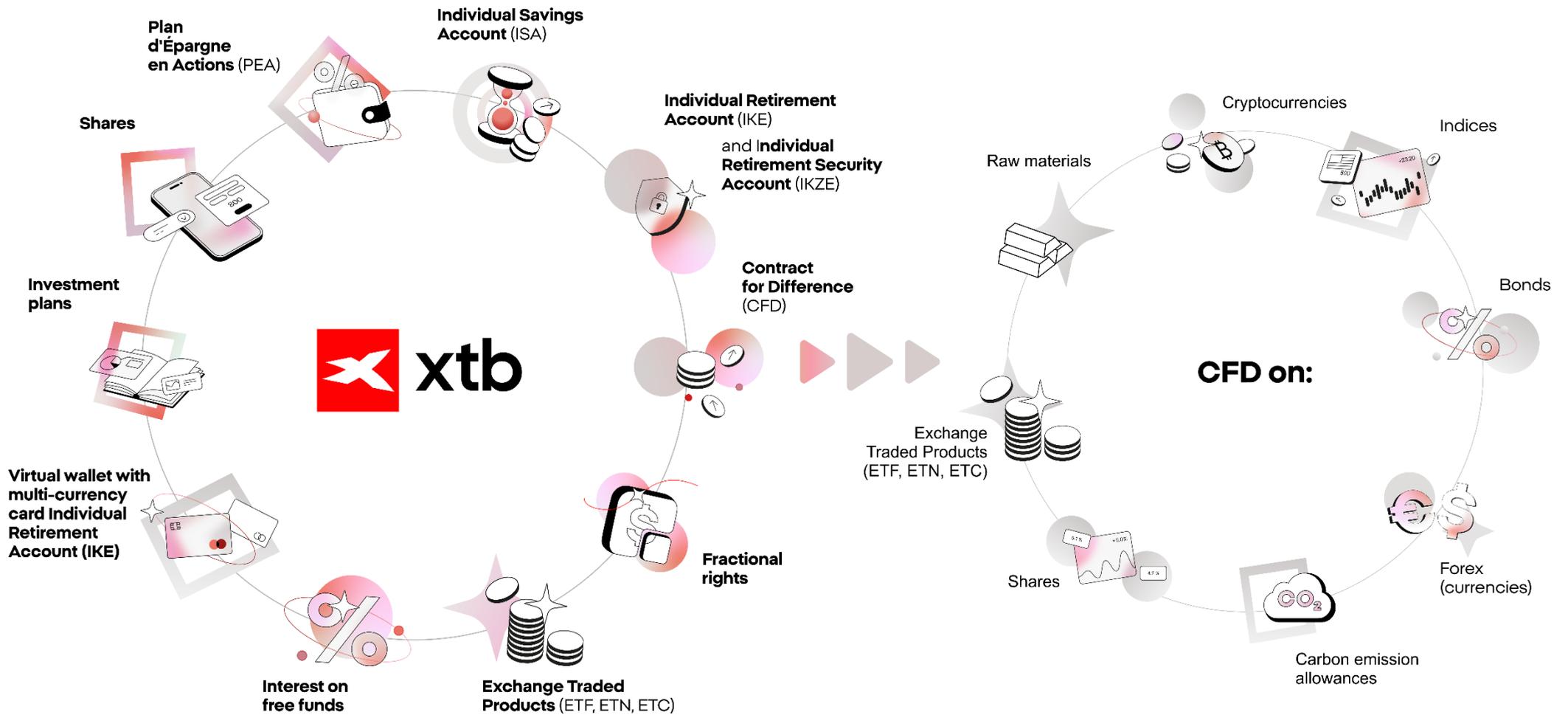
Impact on strategy, business model and value chain

One of XTBS Group's key stakeholder groups is the clients to whom we target our offering. Identifying their needs for investment portfolio diversification, in 2025 we expanded our offering with pension products, developing simultaneously technology, the app and our trading platform. The area of sustainability did not determine the shape of the XTBS 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 XTBS application functionality, introducing rating-based instruments to the offer



Core products and services



XTB Group offers over

11,000

investment products which
can be classified into three groups:

Group 1 | investment
products

Group 2 | passive
investing

Group 3 | finance
management

As part of the **investment offering**, 2025 XTB's portfolio included:

ETP (Exchange Traded Products): ETF, ETC, ETN

ETPs are a group of investment products listed on stock exchanges, the most well-known of which are ETFs (investment funds whose units are listed on regulated markets). ETFs allow for investments in stocks, stock indices, or bonds. ETPs also provide exposure to commodities, precious metals, and cryptocurrencies in the form of ETCs and ETNs. The essence of an ETP 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 1,800 ETPs and ETFs based on ESG indices.

CFDs (Contract 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. XTB offers clients the opportunity to invest in CFDs based on ESG indices.

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 7,000 shares of companies listed on 16 of the world's largest stock exchanges.



XTB's **passive investing/saving** portfolio in 2025 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. The diversified ETF funds available in XTB's offer allow you to gain exposure to entire markets, industries or geographic 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 2025, Poland implemented the Individual Retirement Account (IKZE), while France implemented the PEA (Plan d'Épargne en Actions) plan. This was the next step in product implementations after 2024, when we introduced the Individual Retirement Account (IKE) in Poland and the Individual Savings Account (ISA) in the UK, for long-term savings. Within the IKE account, clients can invest in shares and ETFs. Furthermore, all available funds earn interest. Within the ISA account, XTB offers British clients a Flexible Cash and Stocks & Shares ISA, which allows account holders to withdraw and reinvest funds within a single tax year without affecting their annual contribution limit. In the first quarter of 2026, XTB launched the so-called Cash ISA, a special type of savings account that allows you to save money without paying tax on the interest earned.

Within the segment of funds handling, XTB's 2025 portfolio included:

At the beginning of 2025, XTB launched an eWallet service for clients in Poland. Nearly 22,000 clients activated the virtual wallet during that period, 43% of whom were in Poland and 57% from abroad. Further significant changes to the product offering concerned products dedicated to long-term savings, including retirement savings. In Poland, pending orders were added to the IKE (Individual Retirement Account) account, and in the UK, the option of fully or partially transferring an existing ISA (Individual Savings Account) to XTB was made available. In the second quarter of 2025, the PEA (Plan d'Epargne en Actions) account service was launched for clients in France, enabling them to invest in stocks and ETP funds with favorable tax treatment. In the third quarter of 2025, XTB introduced the IKZE (Individual Retirement Security Account) account to its Polish offering.

No decisions have been made in 2025 regarding the future of the XTB Social social trading service, launched in March 2024. It was intended to allow users in selected markets to receive notifications about transactions by selected investors and access their portfolios and key trading statistics, while ensuring full anonymity. In June 2024, the Company decided to suspend this service in the European Union in connection with the position issued by the Polish Financial Supervision Authority on May 29th of this year regarding the conditions for investment firms to provide "social trading" services.



Handling of funds

Virtual wallet with multi-currency card (eWallet)

XTB offers clients a virtual wallet with a card that supports cashless payments in stores, mobile transactions, and contactless cash withdrawals from ATMs worldwide. The eWallet service allows clients to maintain accounts in 25 currencies, including EUR, USD, GBP, PLN, HUF, RON, CZK, CHF, JPY, and CAD, as well as fast and free fund transfers between accounts. The eWallet service provides clients with instant access to their funds and allows payments with a card issued under a Mastercard license by DiPocket UAB, an Electronic Money Institution registered with the Bank of Lithuania. The eWallet service is currently available to clients in Poland, the Czech Republic, Portugal, Romania, Slovakia, Germany, France, Spain, and Italy.

Product plans

The XTB Group is pursuing a strategy of building a universal investment application for every investor seeking to effectively manage their funds, both short- and long-term. In 2026, we plan to expand our portfolio with additional products:

Cryptoasset spot trading - thanks to the Cyprus Securities and Exchange Commission (CySEC) approval received at the end of 2025, clients in Cyprus will be able to access cryptoasset spot trading on the XTB investment app in the first half of 2026. Operations will be conducted in accordance with MiCA requirements. XTB remains interested in applying for a license in Poland, should the opportunity arise and plans to expand offer to other markets.

Stock options are a type of contract that gives the buyer the right to buy or sell a specified number of shares at a predetermined price within a specified time period. The two basic types of options are: a call option, which gives the right to buy a share and profit from an increase in its price; and a put option, which gives the right to sell a share and profit from a decrease in its price.

Long-term investment products:

- Personal Investment Account (OKI) – a new investment product designed to stimulate the capital market and encourage Poles to save long-term. According to the Ministry of Finance's proposal, the product will allow investments of up to PLN 100,000 without the so-called Belka tax, including savings accounts up to PLN 25,000. Funds above the upper limit will be subject to asset tax of 0.8% - 0.9% of the investment value. The bill is currently pending with the Ministry of Finance.
- Expanding the retirement account offering in other European countries, which will strengthen the new customer base and encourage existing XTB customers to use the new product.

Margin trading, or trading using financial leverage, is a product that allows investors to acquire an instrument worth more than their current funds, using funds borrowed from a broker.

Investment Plans 2.0. – Following the success of a product that allows users to create their own portfolios for long-term ETF investing, XTB plans to introduce a version that also allows them to invest in shares.

Expanded trading hours – allowing investors to buy and sell shares outside the main trading session, allowing for a quicker response.

Environmental and social aspects are not a dominant factor in designing its product offering. Nevertheless, offering ETFs to its clients, also aims to address the needs and expectations of conscious clients. XTB's offering includes financial instruments (e.g. ETFs) enabling investments in entities classified in indices that incorporate ESG criteria. In 2023, the Company added ESG rating information to its investment platform for most of the securities of the companies in its offering and for ETF instruments.

In 2025, we offered over 200 ETFs providing diversified exposure to shares or bonds of companies with high ESG ratings (3 or above) based on a specific benchmark. Creating a benchmark for ESG ETF funds involves removing companies from a broader index (the so-called parent index) that do not meet the ESG criteria defined in the index methodology.

Markets served of XTB S.A. Group

As at the balance sheet date of 31.12.2025, XTB Group operated in the following countries:

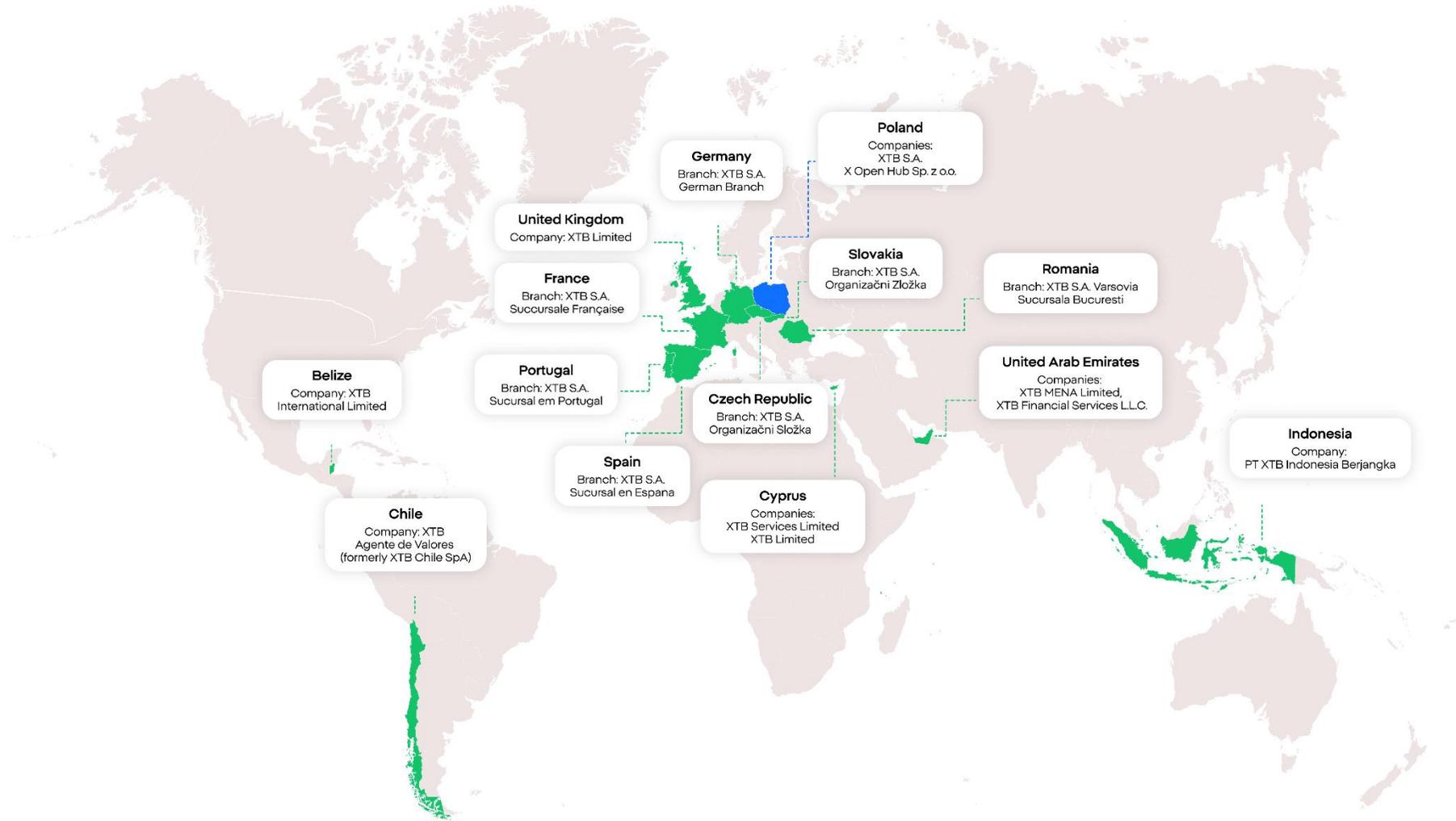


Table 2. Employees employed under employment contract in particular units of XTB S.A.

Number of people (people)			31.12.2025	31.12.2024	2025/ 2024
Company	XTB S.A.	Poland	955	703	+35,9%
Branch	XTB S.A. Organizační Složka	Czech Republic	38	33	+15,2%
Branch	XTB S.A. Succursale Française	France	25	26	-3,8%
Branch	XTB S.A. German Branch	Germany	28	22	+27,3%
Branch	XTB S.A. Organizačná Zložka	Slovakia	22	17	+29,4%
Branch	XTB S.A. Sucursal em Portugal	Portugal	23	20	+15%
Branch	XTB S.A. Sucursal en Espana	Spain	23	20	+15%
Branch	XTB S.A. Varsovia Sucursala Bucuresti	Romania	15	14	+7,1%
Company	XTB Services Limited	Cyprus	10	8	+25
Company	XTB Limited	Cyprus	5	2	+150%
Company	XTB Agente de Valores SpA	Chile	63	75	-16%
Company	XTB Limited	United Kingdom	31	32	-3%
Company	XTB MENA Limited	UAE	10	32	-68,75%
Company	XTB Financial Services L.L.C.	UAE	42	-	-
Company	XTB International Limited	Belize	3	3	b.z.
Company	PT XTBS Indonesia Berjangka	Indonesia	23	7	+228,6%
Company	X Open Hub Sp. z o.o.	Poland	1	1	b.z.
TOTAL EMPLOYMENT			1 315	1 015	+29,6%

In order to avoid double counting of employees working simultaneously in several companies within the XTBS 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.

73%
OF GROUP EMPLOYEES
WORKED AT XTBS HQ AS OF 31.12.2025



XTB Group revenue structure

XTB Group offers investment solutions to more than one million clients. 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

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:

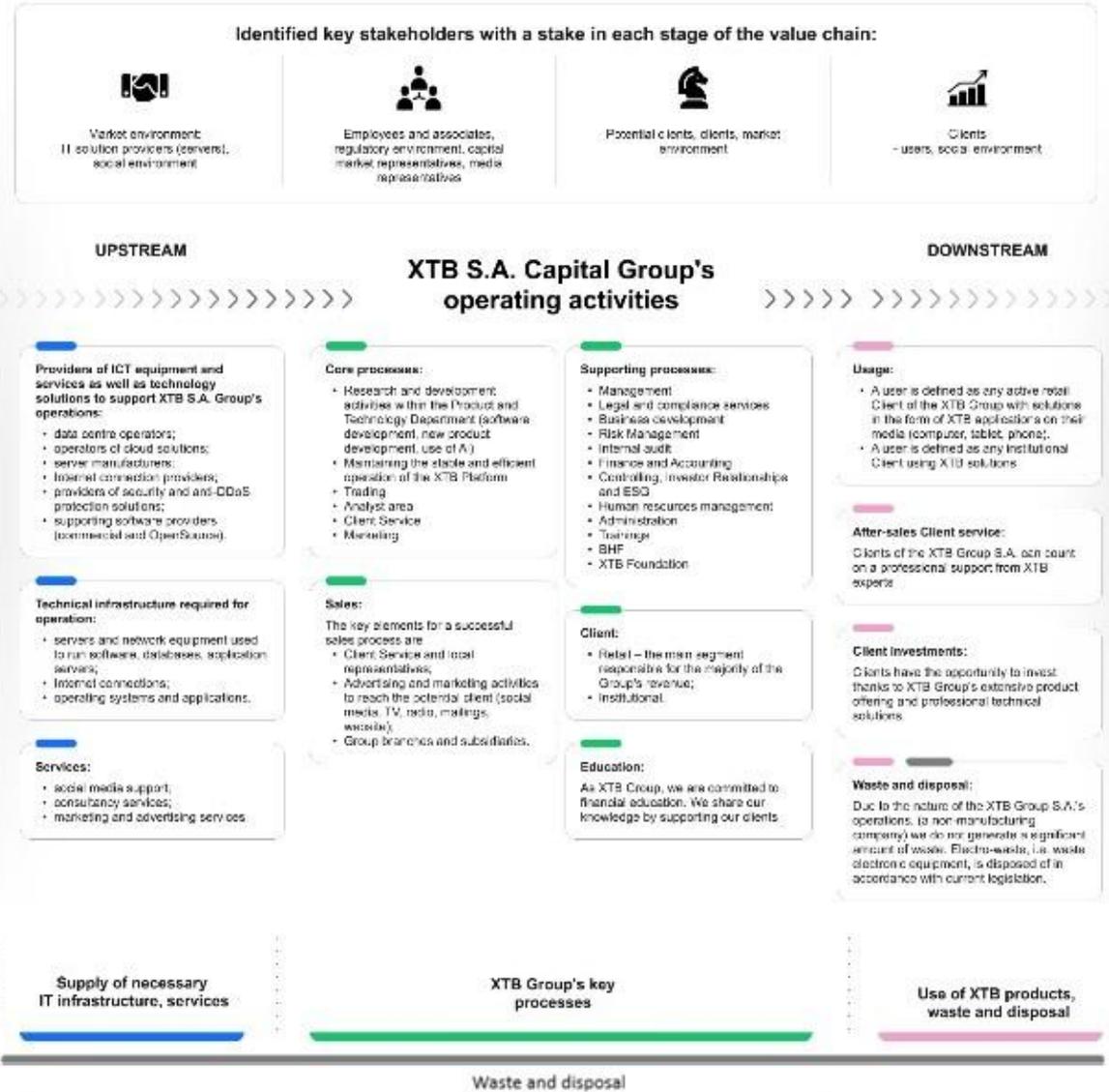
- qualified staff and associates
- cooperation with service providers and equipment suppliers
- XTB's know-how and proprietary xStation platform
- policies and procedures

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



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

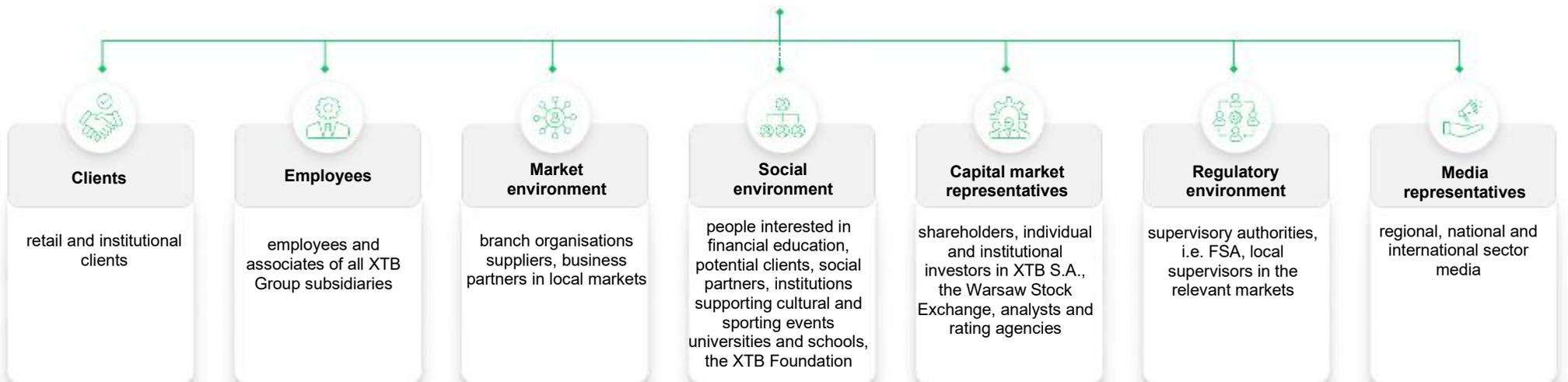
Productive Capital:

- development of IT infrastructure

1.5. Key stakeholders

SBM-2 Stakeholders, as defined by the ESRS, are interested parties affected by an entity (positively or negatively) and users of sustainability statements, some of whom may belong to both groups. The XTB Group's key stakeholder groups were identified in the first stage of the dual-materiality study, during stakeholder mapping and analysis of existing data and XTB's operations by the Sustainability Team, and then confirmed during workshops with employees. It is true, however, that these stakeholders were well-known to the organization much earlier, influencing, among other things, the organization's operations, investment offering, and appetite for further development. We observe diverse needs among the identified stakeholder groups, which we incorporate into our operational and strategic activities. Our goal is to create value through dialogue with stakeholders and to develop the company while respecting their expectations. Therefore, we consistently based our 2025 reporting on the opinions of stakeholders invited to participate in the double materiality study in 2024. These opinions were presented to the Management Board of XTB S.A. and are summarized in subsection [1.6.1. Double Materiality Assessment](#).

KEY STAKEHOLDERS



Dialogue with stakeholders

In the 2025 Statement, we base our analysis on the results of the Double Materiality Assessment process carried out in 2024. The first step was aimed at gathering the opinions of internal and external stakeholders regarding the XTB Group's business and sustainability activities. We selected a representative group consisting of employees, employee representatives, individual and institutional clients, business partners, media representatives, suppliers, and investor representatives. The assessment was further enhanced by in-depth interviews with representatives of the XTB Group Supervisory Board and representatives of all XTB S.A. branches and companies. Upon completion of the study, we asked internal stakeholders to evaluate the results of the double materiality assessment, verifying whether they confirmed them and had no comments.

The invited stakeholders indicated that, in their opinion, the most important ESG issues for the XTB Group included: responsible e-waste management, minimizing the negative impact on climate change, and reducing greenhouse gas emissions as the most important ESG issues for the XTB Group. Security and confidentiality of personal data, effective communication with employees, and service quality and customer satisfaction were also identified as important. In the area of management, the importance of business ethics, compliance with laws and regulations, anti-corruption practices, and combating corruption, bribery, and money laundering were highlighted. Among the key topics for the Group, stakeholders also highlighted the Group's involvement in educational activities to build environmental awareness among employees and financial management activities for children and youth. Among the frequently mentioned suggestions from surveyed entities was the Group's greater involvement in charitable and social initiatives. The results of the stakeholder survey directly influenced the update of the ESG Strategy 2024-2027, the selected development directions, goals, and the strengthening of the Foundation's activities.

The stakeholder survey allowed us to develop a structured workshop for the double-materiality study. During the workshop, we discussed in detail the impacts (positive and negative, actual and potential) as well as the opportunities and risks with representatives from all areas of the XTB Group's operations. The workshop was moderated by a qualified expert from a consulting firm, who ensured the accuracy and completeness of the study and a professional summary of the dialogue's outcomes.

The final stage of the project involved validation of the results by the Management Board of XTB S.A. and presentation of the results to the Company's supervisory authorities. In 2025, the results of the double-materiality study were assessed for validity and distributed to internal stakeholders who participated in the original study and, separately, to selected employee representatives, requesting their opinion and confirmation that the identified significant topics, impacts, opportunities, and risks covered all areas of XTB's operations that they considered relevant. During discussions with a representative of the Risk Control Department, an additional cybersecurity risk was identified.

The updated results of the 2025 double materiality study were submitted for approval to the Management Board and supervisory authorities of XTB S.A.

For more information on stakeholder engagement, please also refer to Chapter [1.6.1. Double Materiality Assessment](#).

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 ▪ Weekly internal xPress newsletter ▪ 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 ▪ Webinars and training ▪ Confitura Conference ▪ Participation in the IT Job Fair ▪ Involvement in charity events, e.g. supporting "Szlachetna Paczka" 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"> ▪ Google Finance Summit (GtFT) ▪ Meetup letSwift x Toast powered by XTB in Wrocław ▪ JUG meeting in Bydgoszcz and Łódź ▪ Meetup ngPoznan powered by XTB ▪ Ways Conf in Kraków ▪ Devovx Poland Conference ▪ CocoaHeads Tricity 2025 	<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 	<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

The 2025 *Statement* was prepared based on a Double Materiality Assessment (DMA) conducted in 2024 in accordance with ESRS standards and revised in 2025.

The Double Materiality Assessment 2024 was divided into five stages:



The input parameters for the initial DMA process were the identification of key stakeholder groups, processes, and the value chain, which allowed for process structure. During the study, we focused on the XTB Group's operations based on elements of its value chain. At each stage, dialogue was conducted with stakeholder representatives to identify topics for analysis (stakeholder survey) and 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 (upstream/ own operations/ downstream)
- 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 and based on elements of the XTB Group's value chain. 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.

Step 4: Selection methodology of material topics

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.

In summary, the methodology for assessing double significance was based on:

a) Impact significance

- i. positive (actual/ potential), where the magnitude of the impact was assessed by analyzing the scale and scope of the impact and the probability of its occurrence by time horizon;
- ii. negative (actual/ potential), where the severity of the impact was assessed by analyzing the scale and scope of the impact, the irreversibility of the negative impact's effects, and the probability of its occurrence by time horizon.

b) Financial significance

- i. for opportunities – where their scale (possible financial impact) and the probability of its occurrence by time horizon were assessed;
- ii. for risks – where their scale (possible financial impact) and the probability of its occurrence by time horizon were assessed.

Furthermore, in 2024, starting from the results of the double materiality assessment, we conducted a climate scenario analysis for the identified climate risks 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.

Step 5: Validation of the double materiality assessment results by the XTB Management Board and translation of the results into other activities

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.

Step 6: Review and update of the double significance study results

In 2025, the survey results were reviewed by inviting selected employee representatives from the original survey to provide their opinions. Due to the lack of comments and the lack of changes to the Group's business model, scope of operations, and environment, only minor updates were made to the survey results. In collaboration with the Risk Control Department, an additional ESG risk assessment related to cybersecurity was introduced.

In cooperation with the auditor, we decided to eliminate the actual positive impact of area "G" through a transparent reporting process in accordance with the law, recognizing that it results solely from regulations – not from the company's initiative. Due to the lack of significant changes, the list of material topics whose materiality threshold was exceeded from the perspective of revenues and financial materiality for reporting in 2025 remained unchanged compared to 2024:

1. ESRS E1 – Climate change
2. ESRS S1 – Own workforce
3. ESRS S4 – Consumers and end-users
4. ESRS G1 – Business conduct

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. 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.	Standard priority	Own operations
Energy		Potential negative impact that may occur as a result of increasing emissions from activities due to increased electricity consumption.							

S1: OWN WORKFORCE

<p>Working conditions</p>	<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 negative impact is due to differences in the salaries of IT employees compared to other employees, resulting from the characteristics of the industry.</p> <p>Actual negative 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>	<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>Actual positive impact through flexible employment conditions.</p> <p>Actual positive impact of competitive employment conditions and the harmonization of employee evaluation and remuneration principles.</p> <p>Actual positive impact is achieved through the</p>	<p>We identify a material impact on our own workforce through:</p> <ul style="list-style-type: none"> – flexible working time and mode; – competitive conditions of employment; – unification of the principles of evaluation and remuneration of XTB Group employees <p>- development of communication through new tools in response to the high dynamics of the XTB Group's development</p> <ul style="list-style-type: none"> – employee representatives; – work-life balance measures. 	<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"> - unification of the principles of periodic evaluation and remuneration in the XTB Group - expansion of the HR area - 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; – election of new employee representatives; – projects of the Human Capital Management department, (e.g. harmonisation of remuneration rules 	<p>High priority</p>	<p>Own operations</p>
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employee representatives.

Potential negative impact that may occur in the event of insufficient internal regulations regarding work-life balance.

implementation and development of communication tools.

Actual positive impact through the activities of a group of selected employee representatives.

Actual positive impact through flexible employment conditions, the ability to adjust start times and work mode (remote/hybrid/stationary).

and pay gap analysis);

- implementation of an internal communication platform, x Press newsletter 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.	<p>Potential negative impact that could occur if the pay gap between women and men widens.</p> <p>Potential negative impact that could occur if there is insufficient training.</p>	<p>Actual positive impact through actions aimed at equalizing opportunities, initiating the process of verifying salaries in terms of the pay gap.</p> <p>Real positive impact through organized training, the possibility of co-financing employee</p>	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	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	We identify the impact in the short, medium and long term of our business.	High priority	Own operations
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training and actions improving the area of training.

and introducing the DEI Policy.

in the organisation.

On the other hand, identified negative 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.

courses and postgraduate studies;

- internal training organised by the training department.
- available whistleblowing channel;
- trainings in the area of diversity;
- employee training in inclusive language;
- invitation to female members of company bodies (Supervisory Board of XTB S.A.).

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 affect our clients through our universal investment application, a diverse range of XTB investment products, free educational materials, and transparent 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	Actual positive impact through high level of communication				Activities: – communication channels made available, e.g. helpline; – qualified Customer Service department; – analysis of client feedback and		

<p>decisions supported by the analysis of client opinions, and access to information.</p>	<p>knowledge of clients, misunderstanding the specifics of investment products that carry the risk of loss.</p> <p>Potential negative impact that may result from communication bearing the characteristics of greenwashing.</p>	<p>with the client, complete client documentation and shared educational materials.</p> <p>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.</p>	<p>relationships can result in a strengthening of trust in the XTB brand, the acquisition of new clients and fewer complaints.</p>	<p>presentation of proposals;</p> <ul style="list-style-type: none"> – a channel for irregularities and complaints made available; <p>Activities:</p> <ul style="list-style-type: none"> – 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

<p>Management of relationships with suppliers, including payment practices</p>	<p>The XTB Group influences relationships with business partners through timely payments.</p>	<p>Non-identified</p>	<p>Actual positive impact through building cooperation with responsible suppliers and business partners and no delays in payments.</p>	<p>The XTB Group influences its suppliers by reducing payment delays.</p>	<p>Impacts are aligned with the Business Strategy and ESG Strategy by building valuable relationships with partners in the value chain, which translates into the high quality of XTB products and</p>	<p>Building good relationships with XTB's business partners.</p>	<p>Practices resulting from XTB's responsible governance.</p>	<p>Standard priority</p>	<p>Upstream Own operations</p>
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					services and the development of corporate governance.				
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: –Anti-Corruption Policy of XTB S.A. - training for members of the Management Board, Supervisory Board and employees performing functions particularly exposed to risk – whistle-blowing procedure and incident register in place; – 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	Potential negative impact that may occur as a result of data processing where there is a risk of leakage	Actual positive impact through implemented data protection security systems (including personal data), creation of data	There is an impact on people as a result of the data protection safeguards implemented. There may	The impact is related to XTB Group's business model, which identifies offering investment products and investment solutions to our	In the event of a data leak, the impact results in damage to XTB's image, disrupting client trust in XTB.	Activities: – modern and updated network and system security; – training and information campaigns among employees.	Moderate priority	Upstream Own operations Downstream

	processing personal data of its clients. This impact is secured by implemented data protection security systems (including personal data), back-ups created or diversification of XTB's locations.	or breach of personal data.	back-ups in the event of unforeseen circumstances, diversification of IT infrastructure locations.	be a potential negative impact in the event of data leakage.	clients as the core of XTB Group's business, which clearly involves data processing.	Data processed by the XTB Group is adequately protected in the event of 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.			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 and ongoing trainings.	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 social 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; vi. whistleblowing procedure in place.	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 related to a decline in the quality of services provided by the XTB Group in the event of deterioration of employment conditions, ineffective employment policies resulting in increased turnover, loss of talent and key employees, leading to cost pressures and a reduction in XTB's attractiveness as an employer.	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 XT B Group.	The risk does not arise from XT B'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. Anti-Corruption Policy of XT B S.A.; iii. anti-corruption trainings; iv. 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 XT B 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 XT B'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 XT B 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 XT B Group's partners, and the failure to properly fulfil reporting obligations.	The risk does not arise from XT B'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 XT B'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

<p>Business conduct</p>	<p>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.</p>	<p>Risks arising from the characteristics of XTB S.A.'s investment products which are part of the Company's business model.</p>	<p>No impact of risk on strategy, business model and decision-making. Possible impact on value chain stakeholders.</p>	<p>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.</p>	<p>No current financial effects. The Group is unable to estimate the financial effects of the risks.</p>	<p>Own operations Downstream</p>
<p>Business conduct</p>	<p>Security risks include any activity aimed at criminals gaining access to customer accounts and assets, conducting unauthorized transactions and transferring funds, stealing confidential data, and DDoS attacks, which are significant factors influencing the risk of loss of resources for the company and its customers.</p>	<p>Risk directly related to the business model and the nature of the XTB Group's business activities.</p>	<p>If materialized, the risk would impact internal operational processes, XTB's reputation, the items in the XTB Group's financial statements and the situation of XTB's clients.</p>	<p>i. introducing default two-factor authentication (2FA) for customers ii. continuously improving XTB's security iii. conducting cybersecurity campaigns to build stakeholder awareness iv. cooperating with supervisory authorities on cybersecurity and reporting irregularities v. educational activities on cybersecurity for employees vi. monitoring customer transactions for unusual features, requesting additional authorization when changing withdrawal accounts vii. cooperating with other market participants to combat cybercrime, obtaining information on discovered system vulnerabilities and cybercriminals' modus operandi.</p>	<p>There are no significant current financial consequences. The Group is unable to estimate the financial impact of the risk.</p>	<p>Own operations Downstream</p>

<p>Business conduct</p>	<p>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.</p>	<p>Opportunity arising from the ESG Strategy.</p>	<p>No impact on strategy, business model and value chain. Possible impact on decision-making.</p>	<p>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</p>	<p>No current financial effects. The Group is unable to estimate the financial effects of the risks.</p>	<p>Own operations</p>
<p>Business conduct</p>	<p>An opportunity to improve the sustainability reporting process by monitoring and adapting it to ongoing legal changes and implementing best reporting practices.</p>	<p>The opportunity does not arise from XTB's strategy and business model.</p>	<p>No influence on strategy, business model, value chain and decision-making.</p>	<p>i. preparation for reporting under the CSRD ii. cooperation with ESG area advisors iii. double materiality assessment</p>	<p>No current financial effects. The Group is unable to estimate the financial effects of the risks.</p>	<p>Own operations</p>
<p>Business conduct</p>	<p>Opportunity for increased investor interest and access to preferential insurance terms as a result of proper management of the ESG area.</p>	<p>The opportunity does not arise from XTB's strategy and business model.</p>	<p>Lack of impact on strategy, business model and decision-making process. Possible impact on the value chain.</p>	<p>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</p>	<p>No current financial effects. The Group is unable to estimate the financial effects of the risks.</p>	<p>Own operations</p>

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.
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. , 2.1.
GOV-4	Due diligence statement	4.6.
GOV-5	Risk management and internal controls over sustainability reporting	1.1. , 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.](#)

ESRS E3: Water and marine resources

IRO-1 Description of processes for identifying and assessing significant impacts, significant risks and significant opportunities [1.6](#)

ESRS E4: Biodiversity and ecosystems

IRO-1 Description of processes for identifying and assessing significant impacts, significant risks and significant opportunities [1.6](#)

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.](#)

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)		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			Delegated Regulation (EU) 2020/1816, Annex II		
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 benchmark portfolio to			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
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 in Annex II of the E-PRTR Regulation	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 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
(European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	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
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Non-material
ESRS E4-2	Indicator number 11 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
Sustainable land / agriculture practices or policies paragraph 24 (b)	ESRS E4-2				
Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Non-material
Policies to address deforestation paragraph 24 (d)	ESRS E4-2				
	Indicator number 15 Table #2 of Annex 1				Non-material
Non-recycled waste paragraph 37 (d)	ESRS E5-5				
	Indicator number 13 Table #2 of Annex 1				Non-material
Hazardous waste and radioactive waste paragraph 39	ESRS E5-5				
	Indicator number 9 Table #1 of Annex 1				Non-material
Risk of incidents of forced labour paragraph 14 (f)	ESRS 2- SBM3 - S1				
	Indicator number 13 Table #3 of Annex I				Non-material
Risk of incidents of child labour paragraph 14 (g)	ESRS 2- SBM3 - S1				
	Indicator number 12 Table #3 of Annex I				Non-material
Human rights policy commitments paragraph 20	ESRS S1-1				
	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				3.1.5

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
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
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

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
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 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Non-material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights	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

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Chapter of Sustainability Statement
principles and OECD guidelines paragraph 19					
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 on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Non-material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 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
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
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 2025, 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

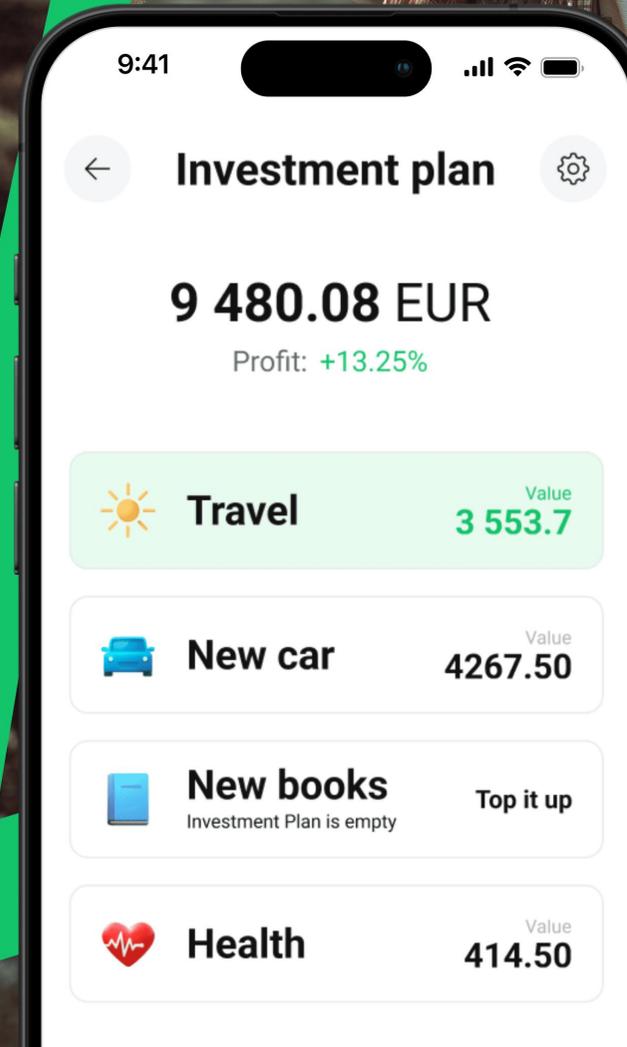
2.1.3 Greenhouse gas emissions

2.2 Compliance of XTB Group's activities with the Taxonomy

2.2.1 Financial Taxonomy

2.2.2 Minimum Guarantees

Environment



2. Environment

2.1. Climate change

The core business of the XTB Group is based mainly on the use of IT infrastructure, office supplies and electricity, which are necessary to maintain the continuity of our operations and provide digital services in the form of the XTB investment application.

Despite the non-productive nature of our operations and the lack of raw material and consumable consumption, we are conscious of our impact on the natural environment and climate change, particularly through Scope 3 greenhouse gas emissions (which in 2025 accounted for 98% of our carbon footprint). We lease regional offices, but thanks to a flexible working model, including hybrid and remote systems, and the absence of a vehicle fleet, the XTB Group's Scope 1 and Scope 2 emissions remain low.

E1-1 In the ESG Strategy for 2024-2027, we set a goal to calculate the full carbon footprint of the XTB Group, which we consistently implemented in 2025. 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. To prepare an appropriate action plan, however, we need comparative data from several periods to identify trends and tendencies, with 2025 being only the second year of calculating our full carbon footprint. Therefore, we have not undertaken the development of a transformation plan for climate change mitigation. We will analyze the feasibility of developing and implementing one within four years after developing a decarbonization plan.

E1 GOV-3 In 2025 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. 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 is 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 sustainability reporting.

We are an investment firm with an office and administrative focus. Operating processes, crucial to maintaining business continuity and developing XTB services, are based on maintaining the necessary IT and digital infrastructure. The most significant identified areas of the XTB Group's impact on the climate and environment include the consumption of purchased electricity at XTB regional offices and within Scope 3 of greenhouse gas emissions, categories related to the use of the XTB investment application by clients, and the purchased products and services of our suppliers. Our business is not a highly energy-intensive industry, and we are not directly responsible for most greenhouse gas emissions.

As part of the *Double materiality assessment*, the organization identified energy efficiency initiatives, including pursuing the purchase of energy-efficient servers, locating XTB S.A.'s headquarters in a certified building, and locating selected offices of the Group's foreign entities in more energy-efficient buildings. During the reporting period, the XTB Group did not utilize decarbonization levers; however, it will consider implementing decarbonization levers in the future, depending on identified needs and opportunities.

E1-2 / MDR-P In 2025, the XTB Group reviewed its key climate-related opportunities and risks, identifying no changes in their impact, and adhered to the current Climate Policy. This document, implemented in 2024, organizes the company's climate management activities and sets the direction for further development in this area, complementing the ESG Strategy in this regard. The identified risks have been incorporated into the internal risk management system. The Climate Policy is the only policy in force at the XTB Group regarding climate change mitigation and adaptation, and its guidelines support the organization's processes and operational activities.

As part of the work on the Policy, a scenario analysis was conducted in 2024 in collaboration with an external expert, based on the TCFD guidelines and the IPCC RCP and SSP scenarios, which remained in force in 2025. The analysis considered two extreme scenarios and is intended to provide a basis for future adaptation decisions, reflecting the level of uncertainty arising from available data.

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 SustainabilityTeam is responsible for updating the document. The document is approved by a resolution of the Management Board, and its version in effect on the date of the Statement's publication was adopted in December 2024. The XTB Group's ability to implement actions to mitigate and adapt to the effects of climate change depends solely on the availability of energy (including renewable energy). In 2025, similarly to last year, the XTB Headquarters covered 100% of its electricity consumption using renewable energy sources (wind energy). In 2025, the XTB Group did not incur significant capital expenditures or operating expenses required to implement the actions undertaken.

Table 11. XTB Group projects managed/ completed in 2025

Project	Implementation status
Ongoing completion of the "Natural Investment" in-house educational programme	Ongoing process
Review of the Double Materiality Assessment in areas E, S, G	Completed in 2025
Review of the climate opportunities and risks	Completed in 2025
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, ongoing process in 2025
Ongoing completion of the ESG Strategy for 2024-2027	Ongoing process

In 2025, we reviewed and updated the results of the Dual Relevance Study, i.e., the list of relevant topics related to climate change and the environment, and the identified key climate opportunities and risks.

SBM-1 / SBM-3 In 2025, the significance of the only key physical risk in the climate area was maintained, defined as "External event risk (business continuity risk) related to the possibility of sudden, extreme weather events occurring at the locations of certain XTB Group companies and branches." Although we do not have significant assets or IT infrastructure in the affected locations, we considered this risk important due to the employees employed in these locations. This risk does not currently and should not affect the XTB Group's strategy or business model in the future. During the reporting period, there was no significant impact of the transition towards a low-emission economy on macroeconomic trends, energy consumption, the energy mix, or technological development.

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) regular 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.

Current climate commitments

- 1) Annual calculation and monitoring of XTB's carbon footprint in three scopes.
- 2) Striving to achieve climate neutrality understood as net zero emissions in scopes 1, 2 and 3 according to the GHG Protocol standard.
- 3) Improvement of 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, and its geographic areas reflect the Group's operations – office locations subject to scenario analysis. The Policy is addressed to external and internal stakeholders: clients, employees, media representatives, capital market representatives, and representatives of our social, regulatory, and market

environments. The Policy is a publicly available document, adopted by resolution of the Management Board and known to XTB Group employees. The Sustainable Development Team is responsible for its implementation, and business partners are encouraged to support its goals and develop their own climate-related activities.

Due to the lack of measurable goals for the Climate Policy, its effectiveness will be assessed through an annual review of the document and the actions declared therein. The Sustainable Development Team is responsible for the analysis, and in collaboration with other XTB Group employees, it will support the development of climate and environmental management. In the future, when greenhouse gas emission reduction targets can be set, they will serve as key performance indicators for the Policy.

E1-2 MDR-P / E1-3 MDR-A As of the publication date, 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 4-year period (including setting emission reduction targets).

2.1.2. Fuel and energy consumption

E1-5 MDR-M

The sources of direct fuel consumption at the XTB Group are a small number of company cars and generators. The most significant electricity and heat consumption at the XTB S.A. Capital Group is attributed to XTB's core administrative and office operations and IT infrastructure. The energy consumption and energy mix indicator was not verified by any external entity other than the consultant with whom we conducted the calculations. In the absence of data, estimates were made based on actual data from other companies with similar locations (geographical location) and similar parameters (heat energy included/excluded in electricity). The following sections provide information on direct electricity, heat, and fuel consumption at the XTB S.A. Capital Group.

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.

Scope 1 biogenic emissions

Biogenic emissions are emissions outside the limits resulting from the combustion of biocomponents added to fuels commonly available at gas stations and used in vehicles owned or controlled by the company. Analyzing the data presented in Table 12, we observe a 59% year-on-year decrease in biogenic emissions. This is due to lower fuel consumption in vehicles in the XTB Group in 2025.

Table 12. Biogenic emissions of XTB Group in 2025 and 2024

Biogenic emissions (tCO ₂ e/year)	2025	2024	2025/2024
XTB S.A. HQ	0,13	0,28	-53,6%
Branches of XTB S.A.	0,28	0,72	-61,1%
Other companies of XTB S.A.	0,00	0,00	b.z.
TOTAL	0,41	1,00	-59,0%

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. For data for these categories, provided in units such as kilometers, passenger-kilometers, or tonne-kilometers, it is not possible to separate biogenic emissions. This is due to the lack of information on the exact fuel consumption (in liters) and the biocomponent content of that fuel. Additionally, biogenic emissions may occur in Scope 3 categories 1 and 2 for individual purchased products, services, and capital goods. These emissions were included in the calculations only when relevant data was available from suppliers. Otherwise, due to lack of information, biogenic emissions from these categories were not included.

XTB Group energy basket

Table 13. XTB Group energy mix in 2025 and 2024

Consumption	Unit	2025	2024	2025/2024
Fossil energy consumption	MWh	1 986	1 502	+32.2%
Energy consumption from nuclear sources	MWh	0	0	-
Percentage of fossil sources in total energy consumption	%	89%	86%	+3,0 p.p.
Percentage of energy consumption from nuclear sources in total energy consumption	%	0	0	-
Renewable energy consumption, including:	MWh	253	248	+2,0%
Consumption of fuel from renewable sources (biomass, industrial and municipal waste of biological origin, biofuels, biogas, hydrogen from renewable sources, etc.)	MWh	0	0	-
Consumption of purchased electricity, heat, steam and cooling from renewable sources	MWh	253	248	+2,0%
Consumption of self-generated renewable energy without fuel	MWh	0	0	-
Share of energy from renewable sources in the total energy consumption	%	11,3%	14,2%	-2,9 p.p.
Total energy consumption related to own operations	MWh	2 239	1 750	+27,9%

2024 remains the base year for the Group's energy mix disclosure.

In 2025, we recorded an increase in fossil energy consumption (+32.2% yoy) and consequently, an increase in Scope 2 emissions ([Chapter 2.1.3 Greenhouse gas emissions](#)).

The increase in fossil energy consumption is due to increased electricity consumption (+36% yoy) and district heating consumption (+18% yoy) at XTB Group locations in 2025, as a result of expanding operations in line with the XTB business model (increased customer numbers, expanded IT infrastructure, and increased employment).

In 2025, the electricity used for the XTB HQ in Warsaw came from renewable energy sources (wind energy), as confirmed by a certificate of guarantee of origin issued by the Polish Power Exchange. The share of energy from renewable sources was 11.3% of the total externally purchased energy consumption of the XTB S.A. Capital Group. for 2025 (-2.9 % p.p. yoy).

The XTB HQ is located in an office building with a BREEAM Excellent certification, which supports the rational use of energy, despite the continuous development of XTB's operations and IT infrastructure through the building's energy-efficient LED lighting and motion sensors.

In line with our business model and our commitment to reducing electricity consumption, we are retiring older, energy-intensive servers and replacing them with new, more energy-efficient servers from certified suppliers within the European Union. In addition to increased energy efficiency, they also feature modern solutions such as intelligently adapting energy consumption to load, which also translates into electricity savings.

2.1.3. Greenhouse gas emissions

E1-4 / MDR-T In 2025, we have for the second time undertaken a full-scale calculation of greenhouse gas emissions. We do not identify changes from previous reporting periods, we didn't reduce emissions and have not set reduction targets.

The XTB Group's carbon footprint calculations were developed using recognized international standards and best practices for calculating a 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 XTB Group's external advisor for greenhouse gas emissions calculations. The advisor's assumptions, particularly regarding electricity consumption, solid fuels, purchases, transportation, waste, and employee commuting, were verified by members of the XTB S.A. project team.

The calculations of the XTB Group's carbon footprint for 2025 were carried out in cooperation with an external expert with whom the Group has been cooperating since 2024 and during the reporting period included:

- **education** - an online educational workshop with a summary of XTB's carbon footprint for 2024 for all interested employees and a workshop for the project team;
- **identification of emission sources** - It was confirmed that there were no changes to the XTB Group's business model, operating profile, or processes that could be a source of greenhouse gas emissions. Therefore, the existing process map, which included all possible emission sources, divided into Scopes and Scope 3 categories, was used as a basis;

- **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** - with a tool adapted to the XTB Group's operations, collection of appropriate emission indicators and double verification of calculations.

Boundaries of reported emissions

The XTB Group's greenhouse gas emissions refer to the 2025 financial year, i.e. the period from 1 January to 31 December 2025. The data covers XTB S.A., its branches and subsidiaries by operational and financial control (100% of each entity's emissions).

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.

Scope 3 of the XTB Group's carbon footprint included:

Category 1: Purchased goods and services

Emissions resulting from the production and transportation of goods and purchased services. The scope of this category is based on the accounting principles adopted by the XTB Group. The calculation primarily includes technology and IT services, operational and administrative services, telecommunications and infrastructure services, as well as services related to office space maintenance, cleaning, security, repairs, and equipment servicing. This category also includes the purchase of office and computer supplies, office equipment, subscriptions and industry publications, marketing and advertising services (online and offline), UX research, and other services supporting operational activities, including organizational services.

Category 2: Capital Goods

Upstream emissions related to the purchase of capital goods in 2025 included, in particular, the purchase of IT and telecommunications equipment, office equipment and furniture, and other technical equipment and office infrastructure.

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 employees' commuting to work. Additionally, emissions generated as a result of remote work 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 various electrical devices as well as emissions resulting from data transmission when using the app.

Calculation methodology

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 methodologies¹. 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.

Table 14 presents a summary of the emission indicators used to calculate the XTB Group's carbon footprint for 2025. In order to maintain process consistency and meet the deadlines for publication of the Statement, a cut-off point was adopted, i.e., the date of the last access to the indicator, indicated in each row next to the source name.

Table 14. Sources of emission factors used to calculate XTB's carbon footprint in 2025

Source	Link	Comment
ADEME 2025 <i>(latest access: 23.02.2026)</i>	https://base-empreinte.ademe.fr/donnees/jeu-donnees	Average emission factors for capital goods.
B. Urban, K. Roth, 2019, Residential Consumer Electronics Energy Consumption in the United States in 2017 <i>(latest access: 23.02.2026)</i>	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 <i>(latest access: 23.02.2026)</i>	DEFRA 2025	*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

¹ GHG Protocol: A Corporate Accounting and Reporting Standard

<https://www.gea.com/pl/articles/natural-refrigerants/natural-refrigerants-hydrocarbons.jsp> <https://www.gea.com/pl/articles/natural-refrigerants/natural-refrigerants-hydrocarbons.jsp> Composition of refrigerant R600A (Isobutane)

(latest access: 06.02.2026)

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

(latest access: 06.02.2026)

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

(latest access: 06.02.2026)

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

(latest access: 06.02.2026)

Apple Device EPD Cards [Apple environment](#) *Cradle-to-gate emission factor of purchased equipment *Emission factors in the disposal phase for a given type of equipment

(latest access: 23.02.2026)

DELL Device EPD Cards [DELL product carbon footprints](#) *Cradle-to-gate emission factor of purchased equipment

(latest access: 23.02.2026)

Google Device EPD Cards <https://sustainability.google/reports/> *Emission factors in the disposal phase for a given type of equipment *Cradle-to-gate emission factor of purchased equipment

(latest access: 23.02.2026)

Lenovo Device EPD Cards [Lenovo eco-declaration](#) *Emission factors in the disposal phase for a given type of equipment *Cradle-to-gate emission factor of purchased equipment

(latest access: 23.02.2026)

Samsung Device EPD Cards [Samsung sustainability](#) *Emission factors in the disposal phase for a given type of equipment *Cradle-to-gate emission factor of purchased equipment

(latest access: 23.02.2026)

National Centre for Emission Balancing and Management (KOBIZE), 2025, Calorific values (WO) and CO2 emission factors (WE) in 2023 for reporting under the Emissions Trading Scheme for 2026 Wskaźniki emisyjności dla energii elektrycznej 2025 Calorific values (CV) and CO2 emission factors (EC) in 2022 for reporting under the Emissions Trading Scheme for 2025 Warsaw, December 2024

(latest access: 06.02.2026)

National Center for Emission Balancing and Management (KOBIZE), 2024, Emission indices of CO2, SO2, NOx, CO and total dust [Emissions Index for Electricity 2025](#) Emission indicators of CO2, SO2, NOx, CO and total dust for electricity based on information contained in the National database on greenhouse gas emissions

for electricity based on information contained in the National database on greenhouse gas emissions and other substances for 2024

(latest access: 06.02.2026)

M.Weiss, K. C. Cloos, E. Helmers, 2020, Energy efficiency trade-offs in small to large electric vehicles

(latest access: 23.02.2026)

Ministry of Environment, Waters and Forests National Environmental Protection Agency, April 2025, Romania's Greenhouse Gas Inventory 1989-2023, National Inventory

(latest access: 06.02.2026)

Ministry of Public Utilities, Energy, Logistics & Governance, Energy Report 2024

(latest access: 06.02.2026)

[Energy efficiency trade-offs in small to large electric vehicles](#)

[Romania 2025 National Inventory Document \(NID\)](#)

https://www.mpuele.gov.bz/wp-content/uploads/2025/10/Energy-Report-24_Spread-Final-Sept-29.pdf

and other substances for 2023

Average power consumption by:
-electric car,
-electric bike,
-electric scooter

Emission factor for fuels burned in stationary sources in Romania

Belize Transmission Loss Percentage in 2024

National Centre for Emissions Management, Institute of Environmental Protection National Research Institute, 2025, Poland's National inventory Document 2025, Greenhouse Gas Inventory 1988-2023

(latest access: 06.02.2026)

Naturgy Iberia S.A., 2025, Emissions index of electricity produced in 2024

(latest access: 06.02.2026)

Netzdienste Rhein-Main (Mainova AG), 2025, Emissions index of electricity produced in 2024

(latest access: 06.02.2026)

Odbor Emisie A Biopaliva, April 2025, National Inventory Report 2025 Slovak Republic, Submission under the UNFCCC

(latest access: 06.02.2026)

<https://unfccc.int/sites/default/files/resource/NID%202025%20POL%2015.04.2025.pdf>

https://www.naturgy.pt/pt/mercado_energetico/rotulagem/rotulagem_naturgy

<https://www.mainova.de/de/stromkennzeichnung-der-mainova-strommix-im-ueberblick>

[Slovakia 2025 National Inventory Report \(NIR\)](#)

Emission factor for fuels burned in stationary sources for Poland

Supplier's emission factor for electricity produced

Supplier's emission factor for electricity produced

Emission factor for fuels burned in stationary sources in Slovakia

PGE Polska Grupa Energetyczna S.A., 2025, Struktura paliw 2024 <i>(latest access: 06.02.2026)</i>	https://www.gkpge.pl/bip/s-Struktura-paliw	Supplier's emission factor for electricity produced
Smartest Energy, 2025, Emissions index of electricity produced in 2024 <i>(latest access: 06.02.2026)</i>	https://www.smartestenergy.com/en_GB/fuel-mix/	Supplier's emission factor for electricity produced
Statcounter <i>(latest access: 23.02.2026)</i>	Operating System Market Share Worldwide Statcounter Global Stats	*Global Phone OS Market Share *Global Tablet OS Market Share
Sustainable Web Design, 2024, Estimating Digital Emissions <i>(last access 23.02.2026)</i>	sustainablewebdesign.org	Electricity consumption for data transmission
The Scottish Environment Protection Agency (SEPA), 2024, Conversion factors for waste <i>(latest access: 06.02.2026)</i>	https://www.sepa.org.uk/media/163323/uk-conversion-factors-for-waste.xlsx	Municipal waste density
Umweltbundesamt, 2024, Emissionsbilanz erneuerbarer Energieträger, Bestimmung der vermiedenen Emissionen im Jahr 2024 <i>(latest access: 06.02.2026)</i>	Emissionsbilanz erneuerbarer Energieträger 2024	Location-based emission factor, WTT and percentage of transmission losses for district heating in Germany

Unimot Energia i Gaz Sp. z o.o., 2025, Emissions index of electricity produced in 2024 <i>(latest access: 06.02.2026)</i>	https://eig.unimot.pl/media/4929/download/Struktura-Paliw-2024-Unimot-Energia-i-Gaz%20fin.pdf?v=1	Supplier's emission factor for the electricity produced
Energy Regulatory Office, 2025, Thermal energy in numbers – 2024 <i>(latest access: 06.02.2026)</i>	2024 – Thermal Energy in numbers	Thermal energy emission index - Poland's district heating for 2024
Vattenfall, 2025, Emissions intensity of electricity produced in 2024 <i>(latest access: 06.02.2026)</i>	https://www.vattenfall.de/s-tromkennzeichnung	Supplier emission factor for electricity produced
VEOLIA ENERGIA WARSZAWA S.A., 2025, fuel structure in 2025 <i>(latest access: 06.02.2026)</i>	https://www.energiadlawar.szawy.pl/wp-content/uploads/2025/03/Wplyw-na-Srodowisko-za-2024.docx.pdf	Supplier emission factor for produced thermal energy - district heating
World Bank Group <i>(latest access: 06.02.2026)</i>	https://data.worldbank.org/indicator/EG.ELC.LOSS.ZS?locations=LB	Percentage of transmission losses for Lebanon in 2022
Západoslovenská energetika, a.s., 2024, Emissions index of electricity produced in 2024 <i>(latest access: 06.02.2026)</i>	https://www.zse.sk/dokumenty/zse-energy-mix-en-version.pdf	Supplier emission factor for electricity produced

Calculation standards used

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 (using the emission factor for purchased electricity based on the energy supplier's indicator) and **Location-based approach** (using the emission factor for purchased electricity based on the national indicator) in accordance with 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 XT B 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 2025² database, in which the Fifth Report of the Intergovernmental Panel for Climate Change (IPCC) was used.³ 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

² 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>.

³ 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.

combustion are presented by value for the individual GHGs concerned, while the WTT emission factors are only given in the CO₂e units.

- EXIOBASE 2022⁴ 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:

- 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

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):**
 - At some XTB Group locations, a lack of fuel consumption in emergency power generators was noted, or such information was not obtained. In the absence of a response, it was decided that emissions from these locations would be excluded from the XTB Group's carbon footprint calculations for 2025.
 - At two XTB S.A. branches, due to the lack of data for natural gas consumption for building heating in 2025, consumption was estimated based on available data.
 - At several branches and subsidiaries, no device consuming any fuel was noted.
- **Mobile combustion:**
 - Most branches and subsidiaries of the XTB Group do not have vehicles or a car fleet.
- **Refrigerant leaks:**
 - At some XTB Group locations, no refrigerant leaks/air conditioning systems were recorded, or no such information was obtained. Due to the lack of data, it was decided that emissions from these locations would be excluded from the XTB Group's 2025 carbon footprint calculations.
- **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.

⁴ <https://www.exioibase.eu/>

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 available data for the previous reporting period or residual data for 2025..
- 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.
- National emission factors from the EMBER database take into account emissions for the entire life cycle of electricity production, i.e. direct emissions and upstream emissions (WTT), which according to the GHG Protocol should be included in Category 3 of Scope 3. It was not possible to separate WTT emissions from electricity production, so they had to be included in Scope 2 calculations.
- 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:

- In some XTB Group locations, there was no thermal energy consumption (due to the nature of the space or the use of air conditioning), no heating (due to climatic conditions), or no data was available. In the absence of data, consumption was estimated based on data for thermal energy consumption – district heating – from June 1st to December 31st, 2024. Based on this data, consumption for one month was calculated and multiplied by twelve months to estimate consumption for 2025.
- 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 Poland 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 in Poland, 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

Primary data, in the context of calculating greenhouse gas emissions, are derived directly from measurements of specific sources or processes that generate emissions. Their use provides more accurate and reliable results than estimates based on secondary data or publicly available emission factors. Emissions calculated using primary data represent 1.09% of total Scope 3 emissions (+0.05 p.p. yoy).

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. XTB S.A. and its subsidiaries, as financial entities providing primarily VAT-exempt services, benefit from a partial deduction of input VAT based on the structure or do not deduct it at all. Consequently, the companies' costs are increased by the portion of input VAT that is not deductible. Therefore, it was decided that the expense data will refer to various amounts.
- All items that do not generate emissions and those for which emissions have already been included in other reporting scopes were excluded from the calculations.

- 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 cutoff point was used to exclude expenditures. Selected purchasing categories with a share of less than 5% of total expenditures were excluded from the analysis.
- 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 1: Purchased goods and services: water consumption

- In some XTB Group locations, water consumption was either absent (due to the nature of the space) or data was missing. In the absence of data, consumption was estimated based on water consumption data from available archives or data for other branches and companies. Total water consumption was calculated per employee and then multiplied by the number of employees in the given unit.

Category 2: Capital goods

- Calculations were made based on fixed asset lists prepared by accountants of individual companies/branches. Emissions of almost 61% of fixed assets were calculated based on EPD cards prepared by manufacturers (+14 p.p. yoy), for 32%, average emission factors per device were used (+7 p.p. yoy), while for the remaining 7%, the expenditure-based method was used (-21 p.p. yoy).

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	1 184	61%	218 220,86	14%
Average rate per device ⁵	611	32%	82 815,78	5%
Expenditure-based method	135	7%	1 267 596,49	81%

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

- Category was calculated using the location-based method⁶
- Electricity:
 - Due to the lack of information on greenhouse gas emissions other than CO₂, only CO₂ emissions were included in the national average indicators.
 - Due to the lack of other information from electricity suppliers and national information, it was assumed that transmission losses were already included in the GHG emission factors of suppliers and domestic suppliers. Therefore, greenhouse gas emissions associated with transmission losses were included in Scope 2. As a result, direct GHG emissions resulting from fuel combustion for electricity generation intended to cover transmission losses were not included in Category 3 of Scope 3 to avoid double-counting of these emissions.

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

- Because the national emission factors from the EMBER database take into account emissions for the entire life cycle of electricity production, i.e., direct emissions and upstream emissions, WTT emissions were not included in this category.
- For WTT emissions from transmission losses in Poland, information on the amount of losses from KOBIZE was included.
- For WTT emissions from transmission losses in Belize, information on the amount of losses from MPUELE 2024 was taken into account.
- For other countries, information on the amount of losses for a given country from Enerdata was taken into account for WTT emissions from transmission losses.
- 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.
 - Due to the lack of other information from the supplier of district heating in Poland, as well as from national information, it was assumed that transmission losses were already included in the supplier's and national GHG emission factors. Therefore, greenhouse gas emissions associated with transmission losses were included in Scope 2. As a result, direct GHG emissions resulting from fuel combustion for the production of district heating intended to cover transmission losses were not included in Category 3 of Scope 3 to avoid double-counting of these emissions.
 - 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

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

applied accordingly to the average emission factor for district heating in Poland for 2024.

- 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. 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.

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 2025.
- In some locations of the XTB Group, a lack of sewage and waste production was recorded due to the nature of the properties in question.
- 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.

- Where the value of e-waste and municipal waste is given in units of liters, m3 or containers, along with information on the container volume, it was converted to kilograms, taking into account the waste density, which comes from the Scottish Environment Protection Agency (SEPA) database.
- Where data was unavailable, estimates were made based on archived data or data on specific waste fractions from other companies. The average amount of waste per employee was multiplied by the number of employees.
- Where information regarding the disposal method for the municipal waste fractions bio-waste and mixed municipal waste was unavailable, a conservative approach was adopted, assuming these waste fractions are landfilled.
- Where the value of e-waste was given in liters, it was converted to kilograms, taking into account the e-waste density, which is derived from the SEPA database.
- For electronic waste such as For electronic equipment, laptops, monitors, and PCs, average emission factors for product disposal were used, derived from the information provided in the electronic equipment EPDs of electronic devices that were purchased in 2025 by all branches and companies of XTB S.A. For the remaining electronic waste, emission factors provided by the DEFRA 2025 database were used.

Category 6: Business trips

Some companies use expense accounts to calculate travel expenses. Therefore, the amounts reported are not always net, 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 conducted in 2025, which was completed by XTB Group employees.

- 51% of employees completed the commuting survey, and the collected data was then extrapolated to all employees. If the response rate in a given company/branch was at least 20%, extrapolation was based on the results of that unit. In case of lower response rates, aggregated results for the entire XTB Group were used.
- This category includes direct emissions from fuel combustion and the production of consumed electricity, as well as indirect emissions for these sources, i.e., WTT emissions and direct and WTT emissions from electricity transmission losses.
- According to the GHG Protocol, WTT emissions for this category do not have to be included, but may be included, but they were included in the calculations for the XTB S.A. Capital Group.

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 2025. The input data on which the calculations were based includes the average user login time from each country, divided into interfaces: mobile application and xStation platform. The analyses which

were carried out separately for individual and retail customers, refer only to the forementioned 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. The XTB Group

does not provide software in physical form, therefore this category of issue does not apply to it.

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 Financed 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 Group is not obliged to report greenhouse gas emissions from the above-mentioned shares and bonds held on the balance sheet of the XTB S.A. Capital Group as at December 31, 2025 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 2025, all electricity consumed at the XTB Headquarters came from renewable energy sources (wind energy), as confirmed by the Polish Power Exchange's guarantees of origin. In 2025, the share of externally purchased electricity from renewable sources was 11,3% of the XTB Group's total externally purchased energy consumption (-2.9 p.p. yoy).

Both the purchased electricity and the renewable energy came from the same supplier. Neither the manager of the Skyliner office building, where the XTB S.A. Headquarters is located, nor the XTB Group resells energy to third parties. Data on electricity consumption at the XTB Group, collected for the calculation of greenhouse gas emissions in 2025, were also used to monitor the identified significant impact of the XTB Group on the climate and environment related to its energy-intensive IT infrastructure.

Recalculation of 2024 base year emissions

Due to changes noted after the publication date of the 2024 Statement, and in order to exercise due diligence and improve the quality and comparability of the collected data, we have decided to recalculate the Ranges and Categories where appropriate (Table 16).

Table 16. List of XTB Group greenhouse gas emission corrections for 2024

EMISSIONS [KG CO₂E/YEAR]			
2024			
SCOPES AND CATEGORIES	OLD	NEW	% change
SCOPE 1	110 077,56	111 996,37	1,74%
SCOPE 2 (MARKET-BASED)	496 105,63	493 816,83	-0,46%
SCOPE 2 (LOCATION-BASED)	729 401,65	726 399,28	-0,64%
SCOPE 3 CATEGORY 1	20 551 730,78	20 551 746,90	>0,01%
SCOPE 3 CATEGORY 2	525 680,97	525 680,97	0%
SCOPE 3 CATEGORY 3	169 286,87	156 387,57	-7,62%
SCOPE 3 CATEGORY 4	19 049,03	19 049,03	0%
SCOPE 3 CATEGORY 5	77 140,51	33 905,88	-56,05%
SCOPE 3 CATEGORY 6	612 350,74	614 129,37	0,29%
SCOPE 3 CATEGORY 7	627 568,19	285 927,01	-54,44%
SCOPE 3 CATEGORY 11	2 666 149,20	1 467 053,50	-45,97%
TOTAL (MARKET-BASED)	25 855 39,48	24 259 693,43	-6,17%
TOTAL (LOCATION-BASED)	26 088 435,50	24 492 275,85	-6,12%
TOTAL SCOPE 3	25 248 956,29	23 653 880,23	-6,32%

Following the implementation of adjustments and recalculation, the total carbon footprint of the XTB S.A. Capital Group for 2024 decreased by 6.17% compared to the originally reported value. However, most of the adjustments are minor and do not exceed 10%. The largest changes were recorded in:

- Category 5 of Scope 3 (-56.05%)

The change was influenced by an update to the value for the amount of mixed waste, resulting from an update to the allocation of waste generation in accordance with the current office

space lease structure. Furthermore, the calculation formula that estimates the emissions from IT equipment disposal processes was updated based on data contained in the Environmental Product Declaration (EPD) cards used for the calculations in Category 2 of Scope 3.

- Category 7 of Scope 3 (-54.44%)

User responses regarding the number of days spent commuting to work were adjusted so that the sum of commuting days and remote work days was 5 working days per week. Adjustments were made to account for the type of transport, i.e., combined transport or alternative transport. The formula for calculating emissions associated with remote work was also improved. The calculation methodology has been updated by excluding electricity-related Well-to-Tank (WTT) emissions in countries for which emissions were calculated based on data from the EMBER database. The method for extrapolating emissions for employees with missing survey data has been improved.

- Scope 3 Category 11 (-45.97%)

This recalculation is due to a change in the methodology for determining the average platform usage time indicator. This modification resulted from an update to the event triggering rules, which improved reporting consistency. As a result, the usage time measurement has been updated and better reflects actual user engagement, ensuring greater comparability across platforms.

Table 17 presents data on greenhouse gas emissions after recalculation for 2024 and current data for 2025, along with an indication of the year-on-year difference.

Table 17. Scope 1, 2 and 3 greenhouse gas gross emissions and total greenhouse gas emissions in 2025 and 2024

	Unit	Base year (2024)	Comparative information	N (2025)	Y/Y (%)
Scope 1 greenhouse gas emissions					
Scope 1 GHG gross emissions.	t CO ₂ equivalent	112.00	none	25.62	-75%
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes	%	0.00	none	0.00	-
Scope 2 GHG emissions					
Scope 2 GHG gross emissions by location-based method	t CO ₂ equivalent	726.740	none	909.07	+25%
Scope 2 GHG gross emissions as per the market-based method	t CO ₂ equivalent	493.82	none	792.93	+61%
Significant Scope 3 GHG emissions					
Total gross indirect GHG emissions (scope 3)	t CO ₂ equivalent	24 852.99	none	41 788.52	+68%
Category 1. Purchased goods and services	t CO ₂ equivalent	20 551.75	none	35 718.94	+74%
Category 2. Investment goods	t CO ₂ equivalent	525.68	none	1 568.63	+198%
Category 3. Fuel and energy activities (not included in scope 1 or 2)	t CO ₂ equivalent	156.39	none	191.35	+22%
Category 4. Upstream transport and distribution	t CO ₂ equivalent	19.05	none	19.52	+2%
Category 5. Waste generated by the operation	t CO ₂ equivalent	33.91	none	55.43	+62%
Category 6. Business travel	t CO ₂ equivalent	614.13	none	627.65	+2%
Category 7. Employee commuting	t CO ₂ equivalent	285.93	none	548.37	+92%
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	1 467.05	none	2 015.78	+37%

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	24 492.98	none	41 680.36	+70%
Total greenhouse gas emissions (market-based method)	t CO ₂ equivalent	24 259.70	none	41 564.22	+71%
GHG intensity per net revenue					
Total greenhouse gas emissions (location-based) per net revenue (tCO ₂ -equivalent/ mln net revenue)	t CO ₂ equivalent	13.07	none	19.42	+49%
Total greenhouse gas emissions (market-based) per net revenue (tCO ₂ -equivalent/ mln net revenue)	t CO ₂ equivalent	12.95	none	19.37	+50%

Comparative analysis of greenhouse gas emissions

The emissions structure remained essentially unchanged compared to the previous year. Scope 1 emissions, i.e., emissions directly related to fuel consumption in buildings and transport, in 2025 in the XTB Group amounted to 25.62 tCO₂e, which represents a 77% yoy decrease compared to 112 tCO₂e in 2024. The decrease in Scope 1 GHG emissions in the analyzed period is related to a 31% decrease in total fuel consumption within the vehicle fleet compared to 2024, which was indirectly related to the sale of one vehicle in the second half of 2025. Additionally, the reduction in emissions was also influenced by the lack of recorded refrigerant leaks in 2025, while in 2024 such an event occurred, generating additional emissions.

2 146 056 274 PLN

Net revenues used to calculate greenhouse gas emissions intensity in 2025

Scope 1 emissions represent 0.06% of all XTB Group 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. The increase in Scope 2 GHG emissions is primarily due to increased electricity consumption (+36% yoy) and district heating (+18% yoy) at the XTB S.A. Capital Group level compared to 2024. A significant factor influencing the result was also the change in the emissions intensity of electricity used in one of the data centers, which in 2025 was responsible for approximately 60% of total Scope 2 GHG emissions. According to the supplier, the electricity emissions indicator at this location increased by 15% compared to the previous year.

Scope 2 greenhouse gas emissions using the location-based method in 2025 amounted to 909.07 tCO₂e (+25% yoy). Using the market-based method, Scope 2 emissions amounted to 792.93 tCO₂e (+61% yoy). This increase is due to higher energy consumption in data centers across the XTB Group. Market-based Scope 2 emissions for 2025 represent 1.91% of the XTB Group's total greenhouse gas emissions (Scope 1 + Scope 2 market-based + Scope 3).

Similar to 2024, the XTB Group's carbon footprint in 2025 was dominated by Scope 3 emissions, i.e., indirect emissions across the entire value chain (98.03% of all emissions). Based on the calculations, there is a clear differentiation between emissions in individual Scopes and Scope 3 categories. Scope 3 category 1 remains the dominant category, accounting for 35,719 tCO₂e, or 85.94% of the organization's total carbon footprint. This means that despite changes in the level of total emissions, their profile and the main emission sources within the organization remained stable year-on-year. The high value in category 1 results from the nature of the company's operations, which generates significant expenditures on services, primarily marketing.

The remaining Scope 3 emission categories have significantly lower emissions, ranging from 19.52 tCO₂e (Category 4. Upstream Transport and Distribution) to 2,016 tCO₂e (Category

11. Use of Sold Products). Their relative contribution to the total carbon footprint also remained relatively unchanged. While these categories and scopes contribute to total emissions, their share is significantly smaller, accounting for only 12.09% of the organization's emissions.

Category 1 Scope 3– Purchased Goods and Services

The 74% increase in emissions is consistent with the 78% increase in spending in this category.

Category 2 Scope 3– Capital goods

The increase in issuance was primarily due to the opening of a new office in the United Arab Emirates for XTB Financial Services LLC. Expenditures related to this project represented 8% of total expenditures in Category 2, but accounted for 45% of issuance in this category.

The second significant factor contributing to the increase in emissions compared to 2024 was the purchase of IT infrastructure equipment. Due to the lack of an available EPD card, emissions were estimated based on reference data from EPD cards for comparable products. This expense accounted for 12% of category 2 expenditures and 25% of emissions in this category.

Category 3 Scope 3 – Fuel and energy activities (not included in scope 1 or 2)

The change in GHG emissions in this Scope 3 category is primarily due to changes in electricity consumption at key operating locations of XTB Group. The year-on-year increase in emissions is directly related to the increase in electricity consumption in these three locations by approximately 27% y/y.

It should be emphasized that the emission level in this category remains strongly correlated with the volume of energy consumption and the factors influencing reported Scope 1 and Scope 2 emissions, which translates into year-on-year variability in the result.

Category 4 Scope 3 – Upstream transport and distribution

In the period under review, the largest share of GHG emissions in this Scope 3 category came from expenditure on courier services of XTB S.A. This source was responsible for approx. 81% of the total GHG emissions in this category.

An increase (+2% y/y) is a result of a growth in expenses on courier services in this company by approximately 6% compared to 2024. Emissions in this category were estimated 100% based on financial data, therefore the final result remains sensitive to exchange rate differences related to expenses incurred by individual branches and subsidiaries of XTB S.A.

Category 5 Scope 3 – Waste generated by the operation

Emissions in this category increased by 63% compared to the previous year. This increase was primarily due to increased emissions from municipal waste, which increased from 32 to 55 t CO₂e. The change was directly related to the opening of a new office in United Arab Emirates.

In 2025 one of the foreign subsidiaries reported 47 t of municipal waste, with landfill disposal being the preferred method of disposal. As a result, although this waste constituted 13% of the total mass of municipal waste reported, accounted for 45% of municipal waste emissions and 44% of total category 5 emissions.

Category 6 Scope 3 – Business trips

Within this Scope 3 category, business travel by various modes of transport accounts for the largest share of GHG emissions, accounting for approximately 87% of the total emissions in this category.

Approximately 96% of emissions in this category were estimated using the spend-based method. Direct comparison of values between years is limited due to differences in input data

availability and methodology (in 2024 at XTB S.A. a significant part of the emissions was estimated based on data on the distance traveled).

As with Category 4 Scope 3, the total emissions level remains sensitive to exchange rate fluctuations related to expenses incurred by individual branches and subsidiaries of XTB S.A.

Category 7 Scope 3 – Employee commuting

In analyzed year emissions in category 7 increased by 92% yoy. Emissions connected with commuting to work increased by 98%, emissions resulting from remote work increased by 52% yoy. Increase in both areas, was primarily due to an increase in the number of employees compared to the previous year.

In the reporting year, a decrease in the share of public transport in commuting to work was observed compared to the previous year, from 72,29% in 2024 to 60,73% share of kilometers traveled in the total number of kilometers. At the same time, the share of trips by combustion cars increased, from 24,08% to 32,20%. The change in the transport structure has contributed to the increase in emissions in this category.

An additional factor influencing the change in emissions levels was the introduction of a new survey and updated methodological assumptions. One of the key changes was the inclusion of a question about the distance between the employee's home and workplace, which allowed for a more precise assessment of the means of transport used, including the identification of combined transport and alternative forms of commuting. This indicator was not included in the previous survey, meaning that emissions reported for the previous year may have been underestimated.

Category 11 Scope 3 – Use of sold products

During the period under review, emissions in this category increased by 37% compared to the previous year. This increase was primarily due to an increase in the number of customers, which increased by 63% during the same period.

For Scope 3 GHG emissions in categories 1 and 2, the expenditure-based approach supports understanding the carbon footprint structure and identifying expenditure categories that contribute the most to the XTB Group's carbon footprint. In subsequent reporting periods, we will strive to improve data quality, particularly in the most tangible expenditure categories, and seek collaboration with suppliers.

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. The full carbon footprint was calculated for the second time in 2025, while 2024 remain the base period for a comprehensive calculation of the XTB Group's greenhouse gas emissions, therefore emission reduction targets have not yet 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. 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 18. 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 31.12.2025			As for 31.12.2024		
	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)	758 448	8,3%	75,3%	521 792	7,8%	46,4%
Debt instruments (government bonds and corporate bonds)	5 598	0,1%	0 6%	429 648	6,5%	38,2%
Shares and ETFs	242 927	2,7%	24,1%	172 483	2,6%	15,4%
Total assets invested in the proprietary trading business of an investment firm	1 006 973	11,1%	100%	1 123 923	16,9%	100%
Total assets (balance sheet total)	9 086 667	100%	n.d.	6 645 632	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 75.3%.
- 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 0.6%.

The remainder of XTB's asset portfolio consists of equities and Exchange Traded Funds (ETF) units. The shares and ETF units held are responsible for approx. 24.1% of the portfolio above and 2.7% 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 2025 other than:

- bond purchase and sell,
- transactions related to orders from clients on derivatives,
- the purchase of shares and ETFs 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 ETFs 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 2025 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 2025 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 2025 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 41 985 thousand (including PLN 0 from institutional clients) – at the end of 2025;

- trading on company's own account - (the following occurred: purchase of bonds (approx. PLN 12.7 million – as at the end of 2025), derivative instruments (approx. PLN 1 966 million, including approx. PLN 37 million from institutional clients – as at the end of 2025), purchase of shares and ETFs of an ancillary nature in order to execute client orders (approx. PLN 36 million – as at the end of 2025, 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 101 million – stock at the end of 2025.

In 2025, XTB S.A. Capital Group companies executed proprietary transactions related to client orders in derivative instruments for 45 institutional clients – listed above. In 2024, a survey requesting information on taxonomic disclosures was sent to 41 institutional clients. One client completed the taxonomic disclosure tables in response to the survey. The remaining clients do not publish or provide 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. 37 million at the end of 2025, 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 rights 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.

Non-financial Taxonomy

Companies within the XTB S.A. capital group operate under a unified business model of the parent company, XTB S.A., which conducts financial and investment activities. Therefore, and because we are not a non-financial company, we do not identify an obligation to assess compliance with the non-financial taxonomy under applicable regulations, including Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment and related delegated acts, and we do not identify an obligation to report indicators for non-financial companies for the 2025 financial year.

We confirm that all subsidiaries strictly support the business model and the primary objective of XTB S.A.'s financial operations by providing marketing, advertising, sales, and

technological support. Furthermore, their revenues do not exceed 10% of the XTB Group's total revenues.

XTB S.A. does not make any representations in external communications or public information that its operations are compliant with the EU Taxonomy, nor does it claim to be engaged in activities compliant with the Taxonomy.

2.2.2. 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 2025, two labor law proceedings were pending at one of XTB S.A.'s branches, which were analyzed and assessed by XTB. As of the date of this Statement, the cases are still under investigation.

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. After the balance sheet date, a new feature was also introduced, the so-called "Emergency Lock," which allows you to immediately restrict access to your account in the event of suspicious activity, disabling transactions, withdrawals, and eWallet services, giving you time to change your password, secure your funds, and maintain control.

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"). XTB S.A. has appointed a Data Protection Officer, whose activities involve a range of ongoing and long-term activities. The Data Protection Officer continuously collects information to identify processing processes, analyzes and verifies compliance with processing, and provides information, advice, and recommends specific actions in this regard to ensure tasks are carried out effectively and efficiently. As part of these activities, the Data Protection Officer serves as the contact point for the supervisory authority in the event of a data breach reported by the controller to the President of the Personal Data Protection Office, as well as for consultations.

Given the Company's advanced technological development, a Team of IT Systems Specialists has been established within the Product and Technology Department. Their task is to support the Company, including the Data Protection Officer, in fulfilling their obligations related to ensuring a level of data processing security appropriate to the risk of violations of the rights and freedoms of natural persons. In carrying out their duties, the Data Protection Officer is supported by the Deputy Data Protection Officer.

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.

Tax risk management processes have been implemented within the company, and tax governance and compliance with tax regulations are a key element of tax oversight. In 2025, the updated XTB S.A. Tax Strategy for 2025-2028 was adopted. This strategy aims to create and maintain an effective, efficient, and transparent tax function within the company, ensuring compliance with tax regulations and ensuring certainty in 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 Rules and Regulations for the Finance, Accounting and Admin Department dated December 9, 2025.

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.

On December 31, 2025, the tax audit ongoing from October 2024 regarding corporate income tax was concluded regarding the application of the method recognized by the Head of the National Tax Administration for determining the transaction price between XTB S.A. and related foreign entities resulting from the APA decision received by the Company. On January 14, 2026, XTB S.A. submitted objections to the KAS findings contained in the tax audit report of December 17, 2025. By letter dated January 28, 2026, the Head of the KAS responded to the objections raised by XTB S.A.

On May 28, 2025, a customs and tax audit was initiated by the Head of the Mazovian Customs and Tax Office in Warsaw against XTB S.A. The scope of the audit covers compliance with tax law regarding XTB S.A.'s obligations as a flat-rate income tax payer on payments of receivables listed in Article 21, Section 1 of the Corporate Income Tax Act of February 15, 1992 (Journal of Laws of 1992, No. 21, item 86, as amended) and Article 29, Section 1 of the Tax Act of July 26, 1991 (Journal of Laws of 1991, No. 80, item 350, as amended). The audit covers the period from January 1, 2021, to December 31, 2021. As of the time of this report, the audit is ongoing. The expected completion date has been extended to June 2, 2026.

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 have a 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 2025 reporting period under review, no violations of fair competition rules were identified and no proceedings were conducted in this regard.

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

Employees are one of XTB's key stakeholder groups – their competencies and commitment have shaped the organizational culture and influenced the company's development for over 20 years. By employee, we mean all XTB Group employees employed under employment contracts, over whom XTB, as an employer, exerts significant influence. By non-employees, we mean individuals collaborating with XTB under B2B and civil law contracts.

Employing and collaborating with over 1,500 people worldwide, we understand the responsibility this brings. Hence, XTB's commitment to work-life balance through flexible and competitive employment conditions and a tailored benefits package. XTB's efforts result in a high level of employee satisfaction; 84.6% of employees would recommend XTB as a good place to work (survey from the end of 2024).

We also ensure occupational safety by providing occupational health and safety training and regular first aid courses. The double-significance analysis did not reveal any significant impacts in the area of human rights, but maintaining the highest standards in this area is our priority. Employees are treated with respect and equality, and employment and promotion are determined by competence. Detailed human rights commitments are described in Chapter [2.2.3. Minimum Guarantees](#) and in the XTB S.A. Diversity, Equal Treatment, and Inclusion Culture Management Policy (DEI).

In 2025, XTB consistently strengthened its high-performance culture by developing the Talent area (formerly the HR department) in a structured manner tailored to the needs of the dynamically growing organization. We introduced a new functional structure that divides responsibilities between People Operations & Enablement, Performance & Strategy, Talent Acquisition, and Culture & Engagement, enabling more specialized, predictable, and scalable

management of HR processes. A key element is the continued development of a mature performance management system through regular Quarterly Performance Reviews and preparations for the implementation of a new bonus policy in 2026, more closely linked to actual performance.

In terms of competency development, we focus on strengthening managerial skills and ensuring full regulatory compliance through mandatory training, supporting leaders in building high-performing teams. At the same time, we are developing mechanisms for early detection of performance, behavioral, and turnover risks, which helps protect operational stability and human capital. Recruitment remains focused on high-quality hires and equal access to processes, while Culture & Engagement activities enhance employee well-being, transparent communication, and engagement. Together, these initiatives foster an environment in which responsible HR practices, talent development, and high efficiency support XTB's sustainable growth.

Communication with employees

Due to the dynamic growth in employment, XTB is strengthening its communication with employees, particularly at its Warsaw headquarters, the Group's largest facility. The interests of Headquarters employees are represented by employee representatives, direct supervisors, and the Chief People Officer, who ensures ongoing dialogue. To improve communication, we have introduced bilingual communications, an intranet, an xPress employee newsletter, "Town Hall" meetings, and internal mailings. Employees also have direct contact with their supervisors and Management Board members. During regular online meetings, the President of the Management Board updates employees on XTB's financial results and strategic plans. Organizational culture is further strengthened through team-building events.

SBM 3 S1-1 In 2025, we implemented the ESG Strategy for 2024-2027, updated in 2024 based on the results of a stakeholder survey as part of a *double materiality assessment*. Employee representatives participated in workshops and in-depth interviews during the study,

which led to the identification of significant impacts, risks, and opportunities related to our own employees. These are described in ESRS 2 SBM-3 disclosure in *Chapter 1.6*. To ensure the ESG Strategy is realistic and measurable, strategic goals were developed in collaboration with employees responsible for XTB's human resources. These individuals are operationally involved in achieving the goals and report progress to the Sustainability Team.

The actual and potential impacts, both positive and negative, on the employee experience identified during the double significance study only confirmed how important this area is for XTB. In addition to positive impacts related to employment flexibility, cooperation with employee representatives, and the implementation of policies and regulations to structure the employee experience, negative impacts (actual and potential) were also identified, including differences in employee remuneration (the pay gap), and insufficient communication that failed to keep pace with the dynamic growth of the XTB Group.

Among other things, the identified impacts and the pay gap calculated for the XTB Group for the first time in 2024 led to advanced actions strengthening internal communication (implementation of the xPress newsletter and regular "Town Hall" meetings), but also to strengthening the remuneration area and establishing an organizational unit dedicated to remuneration. Thanks to the structural changes implemented in the Talent (HR) area, we improved the quality of data collected for the pay gap calculation. A detailed description of the identified key opportunities, risks, and impacts, as well as the links between the opportunities and risks and the strategy and business model, are included in the IRO tables in *Chapter 1.6 of this Statement*.

In 2025, the identified significant impacts, opportunities, and risks related to the employee area were reviewed, but no significant changes were made to their content, apart from minor editorial changes. Furthermore, the survey results were shared with all employee representatives for consultation to confirm that they believed the ESRS topics covered all the significant employee issues they observed. No comments were submitted.

In 2025, we implemented employee initiatives, also in cooperation with the XTB Foundation:

- "Inner Power" workshops encouraging employees to share their passions and interests
- sports activities (participation in the WizzAir Prague Night Half Marathon and the Prague Five), chess, badminton, yoga in the office, football, and basketball
- organization of an XTB picnic, Children's Day at the XTB Headquarters, and a Christmas party for employees
- cancer screenings for employees as part of the "Pink October" and "Movember"
- participation of all XTB companies and branches in the "Two Hours for the Family" campaign (XTB was awarded the title of international ambassador for the campaign promoting the idea of work-life balance)
- completion of annual first aid training
- flu vaccinations organized in the office
- employee volunteering activities (participation in the "Clean River" campaign, participation in beach cleanups and tree planting in Cyprus), participation in Noble Package.

The Management Board and the Talent Department 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, we have not identified any impact of the potential transition plan on XTB Group employees and associates. There is no risk of forced or child labor occurring

within the XTB Group. During the double-materiality study, the value chain and business model were analyzed with understanding, excluding this risk. The analysis considered the regulated nature of the XTB Group's operations, collaboration with reputable partners, the location of its offices, and the nature of the work requiring specific competencies.

2025 is the second reporting period for which we present data in accordance with ESRS standards. During the period under review, improvements were made to the data collection method and the calculation of indicators for this section, although this does not affect year-on-year comparative data.



Characteristics of the XTB Group employees

SBM-3 Employees, as defined by XTB, are natural persons employed at branches and subsidiaries under a contract of employment. By own workforce, we mean persons cooperating with XTB Group entities on the basis of, i.a., self-employment, contracts for specific work, contracts of mandate, appointments, etc.

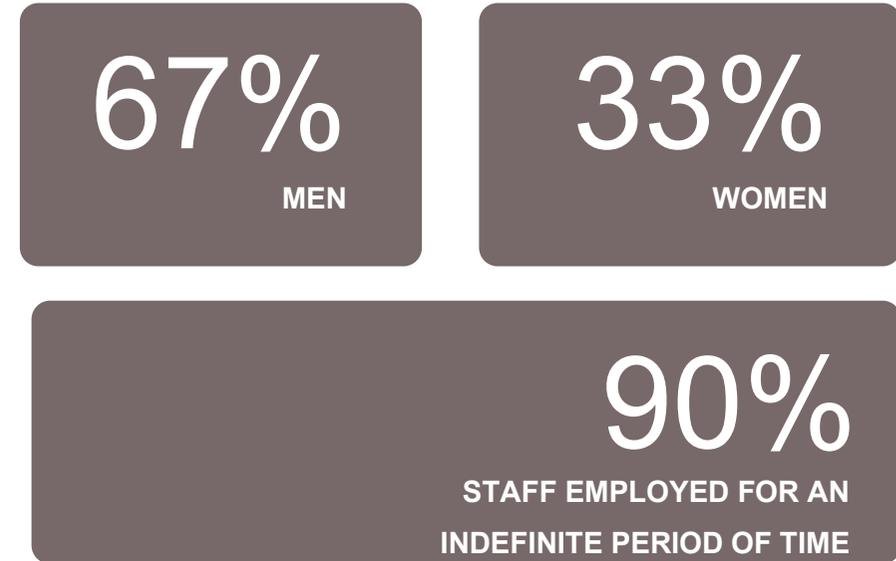
Among the employees working at XTB S.A. branches and companies, we diversify employees in the IT area and administrative and clerical staff of various specialisations.

We do not have operations that may affect increase of 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. To emphasize the scale of operations and show the dispersion of XTB employees across its units, we present information on the number of employees by country in [Chapter 1.4 Strategy, Business Model, and Value Chain](#). 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 31.12.2025.

As at 31.12.2025, the XTB Group employed:



Among the Group's 1 315 employees, as many as 955 (+36% y/y) were employed at the XTB S.A. Head Office in Warsaw as of 31.12.2025, representing 73% of the Group's workforce (+3.3 p.p. y/y).

S1-6 Table 19. Number of XTB Group employees by gender as of 31.12.2025 and 31.12.2024

Gender of the employee	Number of employees		
	31.12.2025	31.12.2024	2025/2024
Women	437	347	+26%
Men	877	668	+31%
Others	1	-	100%
Not disclosed	-	-	-
Total	1 315	1 015	+30%

To calculate the S1-6 disclosure indicators, data was collected on the number of employees employed under an employment contract as of December 31, 2025, broken down by gender. The exception is the turnover indicator, for which the total number of people who left XTB during 2025 was identified. In the financial statements, where the disclosed total number of employees and associates is 1,516, there is a difference due to the inclusion of individuals on maternity, parental, and sick leave (leave of absence exceeding 33 days) in the summary for sustainability reporting purposes.

Table 20. Number of employees of XTB Groups by gender and nature of cooperation as at 31.12.2025 and 31.12.2024

Gender	Women			Men			Others			Not disclosed			Total		
	31.12.2025	31.12.2024	2025/ 2024	31.12.2025	31.12.2024	2025/ 2024	31.12.2025	31.12.2024	2025/ 2024	31.12.2025	31.12.2024	2025/ 2024	31.12.2025	31.12.2024	2025/ 2024
Number of staff employed for an indefinite period of time	385	312	+23%	791	601	+32%	1	0	100%	0	0	bz.	1 177	913	+29%
Number of fixed-term employees	52	35	+49%	86	67	+28%	0	0	bz.	0	0	bz.	138	102	+35%
Number of employees who are not guaranteed working hours	0	0	bz.	0	0	bz.	0	0	bz.	0	0	bz.	0	0	bz.
Total number of employees	437	347	+26%	877	668	+31%	1	0	100%	0	0	bz.	1 315	1 015	+30%

As of December 31, 2025, the XTB Group employed a majority of men: 791 men, compared to 385 women and one person who did not identify as either a woman or a man. 1,177 employees were employed under permanent employment contracts, representing 90% of employment in the XTB Group and a 29% year-on-year increase (an increase similar to the overall employment growth rate). There was also an increase in fixed-term employment (+35% yoy), a growth rate 5 p.p. higher than the overall employment growth rate.

Table 21. Employee turnover rate in 2025 and 2024 year*

Reporting period	2025	2024	2025/2024
Total number of employees who left XTBS.A. Group during the reporting period	151	134	+12,7%
Employee turnover rate during the reporting period (%)	11,5%	13,2%	-1,7 p.p.

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

In 2025, cooperation with the XTBS.A. Group has ended 151 employees, representing 11.5% of total employment in the XTBS.A. Group as of December 31, 2025. Comparing the indicator to the previous reporting period, there was a 1.7 percentage point year-on-year decrease. The indicator does not include individuals who left and were reinstated during the same reporting period. To calculate the turnover rate, the number of employees who left was compared to the total number of employees as of December 31, 2025.

S1-7 Other forms of cooperation

As of 31.12.2025, the following forms of cooperation with persons who were not employees of XTBS.A. Group branches and companies have been used:

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

The total number of people cooperating with the XTBS.A. Group as at December 31, 2025 decreased by 0.8% y/y, as presented in Table 22. In order to avoid double counting, people who were simultaneously employed under an employment contract with XTBS.A. Group companies were excluded from the table.

Table 22. Characteristics of own workforce – non-employees of XTBS.A. Group as of 31.12.2025 and 31.12.2024

Form of cooperation	31.12.2025	31.12.2024	2025/2024
Number of persons cooperating on a self-employed basis (B2B)	203	192	+5.7%
Number of persons cooperating based on civil law contracts: (mandate and specific work)	30	47	-36.2%
Number of persons cooperating based on an appointment	6	5	+20.0%
Number of persons cooperating through an employment agency	9	6	+50.0%
Total:	248	250	-0.8%

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. XTB S.A. has a violation reporting procedure in place to ensure a safe and ethical work environment. Job candidates can report potential violations through dedicated communication channels, and are informed of this at the job application stage.

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 31.12.2025;
- 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 31.12.2025.

S1-9 Diversity indicators at XTBS Group

Table 23. Diversity index of top management as of 31.12.2025 and as of 31.12.2024 (regardless of the form of cooperation)

Gender	People at the top management level		% of people at the top management level		
	2025	2024	2025	2024	2025/2024
Women	15	13	22,4%	20,6%	+1,8 p.p.
Men	52	50	77,6%	79,4%	-1,8 p.p.
Others	0	-	0,00%	-	-
Not disclosed	-	-	-	-	-
Total	67	63	100%	100%	-

In the top management team as of the last day of 2025, the share of men decreased by 1.8 percentage points year-on-year, while the share of women increased by 1.8 percentage points year-on-year. Despite the fluctuations in the percentage to the benefit of the underrepresented gender, men still hold a significant share of key positions at the XTBS Group, representing 77.6% of the staff as of December 31, 2025.

Table 24, located on the next page of the Statement, presents the age structure of the XTBS Group's employees. Based on data collected as of December 31, 2025, we observe a significant increase in the number of employees under 30 years of age employed under employment contracts (+42.8% y/y), which translates into a dominant 41.6% share of the total age structure of employment as of the end of the year (+3.9 percentage points y/y). The next age group to record an increase in employment are those aged 30 to 50 (+22.7% y/y), while their share in the total employment structure decreased by 3.2 percentage points y/y. As in the previous year, the lowest percentage among employees are employees aged 50 and over, representing 1.3% of total employment (-0.7 percentage points y/y). This segment also saw a 15% y/y decline in employment.

The above analysis may indicate that the XTBS Group's employment offer is particularly attractive to younger candidates at the beginning of their careers and meets their expectations, including employment flexibility, development opportunities, and technological advancements.

Table 24. Age structure of employees as at 31.12.2025 and as at 31.12.2024

Age structure of XTBS Group employees (persons)

Reporting period	31.12.2025					31.12.2024					2025/2024
	Women	Men	Others	Not disclosed	Total	Women	Men	Others	Not disclosed	Total	
Number of employees under 30	194	353	0	0	547	130	253	0	0	383	+42,8%
% of employees under 30	44,4%	40,4%	0	0	41,6%	37,5%	37,9%	0	0	37,7%	+3,9 p.p.
Number of employees between 30 and 50	238	512	1	0	751	212	400	0	0	612	+22,7%
% of employees between 30 and 50	54,4%	61,1%	100%	0	57,1%	61,10%	59,88%	0	0	60,3%	-3,2 p.p.
Number of employees over 50	5	12	0	0	17	5	15	0	0	20	-15%
% of employees over 50	1,14%	1,44%	0	0	1,3%	1,44%	2,25%	0	0	2,0%	-0,7 p.p.
Total	437	877	1	0	1 315	347	668	0	0	1 015	+29,6%

3.1.3. Working conditions

S1-10 / S1-16 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%

Non-wage benefits and perks

In 2025, we have made non-wage benefits available to Head Office employees, i.e.:

- Private healthcare
- Co-financing for the MyBenefit platform and the Multisport Package
- "Helping Hand" well-being platform providing psychological support, psychoeducation, and preventative care (including online sessions with therapists, webinars, workshops, educational articles)
- Reimbursement of prescription glasses
- Holiday vouchers
- Vacation allowance for employees employed at XTB over 2-years
- Allowance for using vacation entitlement in a given calendar year for employees employed at XTB over 2-years

- Opportunity to join group life insurance on favourable terms
- An additional day of paid leave for:
 - birthdays
 - care of new parents
 - care of a child with a disability certificate
- Two days off for volunteering
- Meal subsidies
- Referral program.

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 XTBS 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 training policies of XTBS.

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.

Funding for training is a component of the budgets of individual XTBS departments. In foreign branches, the training budget is established by the branch director. Employees are delegated to training by their direct supervisor or based on individual applications approved by the director, as needed.

The main categories of external training include:

- technical training (in the IT area)
- specialised training (to enhance professional knowledge, including postgraduate studies, stockbroker licence preparation course, etc.).
- soft skills training
- training in managerial competences

- 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.

Indicators regarding training and development and regular employee evaluations refer to employees employed at the XTB Group as of December 31, 2025. The summary does not include access to e-learning platforms, where access to courses is unlimited in time, studies, language courses, or courses preparing for licensing. Employees can benefit from subsidized access to e-learning platforms with unlimited in time – five people took advantage of this option in 2025. Additionally, the company provides access to a language learning platform for English (50 users), German (21 users), and Spanish (24 users). In 2025, all employees received periodic Security Awareness training.

Table 28. Training and skills development indicator by gender and hierarchy levels as of 31.12.2025 and 31.12.2024

Average number of training hours per employee (h)											
Reporting period	31.12.2025				31.12.2024				Average number of training hours per employee by hierarchy level (h)		
	Women	Men	Others	Not disclosed	Women	Men	Others	Not disclosed	2025	2024	2025/2024
Senior management and directors	27,87	19,10	-	-	16,30	9,07	-	-	21,00	10,38	+102,3%
Executives and managers	14,88	21,49	-	-	10,86	8,96	-	-	19,61	9,54	+105,6%
Other employees	12,69	14,51	0,5	-	7,23	6,44	-	-	13,86	6,72	+106,1%
Average number of training hours per employee by gender (h)	13,45	16,00	0,5	-	7,87	6,93	-	-	-	-	-
Average number of training hours per employee (h)									15,14	7,25	+108,8%

The average number of training hours per XTB Group employee (without breakdown by gender or classification) in 2025 was 15.14 hours, representing a 108.8% year-on-year increase. By classification, we saw similar growth at each level in 2025. In terms of gender, the number of training hours for men increased most significantly (+130.9%), while for women the increase was +70.9% year-on-year, which is related to the male dominance in employment (67% of employees) and their performance of functions requiring mandatory specialist training. In each case, the growth rate of training hours is significantly higher than the growth rate of employment for employees of each gender. This general increase is due to improved monitoring of accurate training time and an increase in the number of training sessions compared to 2024.

Table 29. Indicator on regular employee evaluation by gender and hierarchy levels as of 31.12.2025 and 31.12.2024

Scheduled employee evaluations												
Reporting period		31.12.2025				31.12.2024				2025	2024	2025/2024
Gender	Women	Men	Others	Not disclosed	Women	Men	Others	Not disclosed	Ogółem			
Senior management and directors	40	135	-	-	10	45	-	-	175	55	+218,2%	
Executives and managers	183	561	-	-	42	161	-	-	744	203	+266,5%	
Other employees	1 084	2 069	4	-	597	1 169	-	-	3 157	1 766	+78,8%	
Total	1 307	2 765	4	-	649	1 375	-	-	4 072	2 024	+101,2%	
Completed employee evaluations												
Senior management and directors	28	77	-	--	11	42	-	-	105	53	+98,1%	
Executives and managers	113	245	-	-	34	155	-	-	358	189	+89,4%	
Other employees	546	891	4	-	584	1 147	-	-	1 441	1 731	-16,8%	
Total	687	1213	4	-	629	1 344	-	-	1 904	1 973	-3,5%	

Table 29 presents the number of planned and completed employee evaluations for employees of the XTBS Group as of December 31, 2025. Analyzing the collected data, we can see an increase in planned evaluations (+101.2% year-on-year), with a slight decrease in completed evaluations year-on-year (-3.5% yoy). These statistics may be due to the transition period introduced in 2025 at the XTBS Group, as the process of implementing a coherent employee evaluation system began. The table presented includes all planned and implemented assessments, but from the last

quarter of 2025 the number of assessments per employee has been standardized (four assessments per year), which means that the number of assessments exceeds the number of people employed. The Talent Department (formerly HR) introduced quarterly employee evaluations, including 360-degree feedback, through which employees regularly self-assess and receive feedback from multiple sources, not only their supervisors and colleagues, but also subordinates. These changes support a culture of open feedback, serve to develop employee competencies and self-awareness, improve collaboration and communication, and plan development paths. The changes were implemented from the last quarter of 2025 in all organizational units of the Group.

Table 30. Percentage of XTB Group employees who participated in regular performance reviews and career development by gender and hierarchy levels as of 31.12.2025 and 31.12.2024

% of employees who participated in regular performance reviews

Reporting period	31.12.2025				31.12.2024				2025	2024	2025/2024	
Gender	Women	Men	Others	Not disclosed	Women	Men	Others	Not disclosed	% of employees			
Senior management and directors	53,85%	70,00%	-	-	70,00%	60,00%	-	-	66,67%	61,82%	+4,85 p.p.	
Executives and managers	77,42%	66,67%	-	-	66,67%	78,31%	-	-	60,55%	74,79%	-14,24 p.p.	
Other employees	59,39%	74,42%	100%	-	74,42%	75,37%	-	-	53,42%	75,03%	-21,61 p.p.	
Total	61,78%	73,49%	100%	-	73,49%	74,70%	-	-	-	-	-	
									General % of employees	55,21%	74,29%	-19,08 p.p.

In 2025, a total of 726 of the 1,315 employees in the XTB Group were subject to regular evaluation, representing 55.21% (-19.08 p.p. y/y). The percentage of men undergoing regular evaluation remained similar (-1.21 p.p. y/y); however, a larger decline was recorded in the implementation of regular evaluations among women (-11.71 p.p. y/y). The observed changes are the result of the implemented organizational changes in the area of evaluations and the reorganization of the process, which was in a transitional period in 2025.

Table 31. Number of work evaluations completed per employee as of 31.12.2025 and 31.12.2024

Completed employee evaluations per employee											
Reporting period	31.12.2025				31.12.2024				2025	2024	2025/2024
Gender	Women	Men	Others	Not disclosed	Women	Men	Others	Not disclosed	Total		
Senior management and directors	2,15	1,64	-	-	1,10	0,93	-	-	1,75	0,96	+0,79
Executives and managers	1,82	1,57	-	-	0,94	1,87	-	-	1,64	1,59	+0,05
Other employees	1,51	1,32	4	-	1,94	2,12	-	-	1,39	2,06	-0,67

As of December 31, 2025, there was an average of 1.5 employee reviews per employee of the XTB Group employed under an employment contract, which is slightly lower than the average of 1.9 reviews per employee in the previous reporting year.

3.1.5. Policies and regulations

S1-1 / S1-2 Employees are key stakeholders of the XTBS.A. Group. To ensure the highest quality of collaboration, we annually survey employee satisfaction and gather feedback with the help of employee representatives to strengthen our collaboration. However, the foundation for responsible employee management, ensuring safety, is the formal and procedural framework, i.e., the policies and regulations implemented at XTBS.A., among which we highlight the most important:

- Work Regulations
- XTBS.A. Human Resources Policy
- Remuneration Policy
- Anti-Mobbing and Anti-Discrimination Policy
- XTBS.A. Diversity, Equal Treatment, and Inclusion Culture Management Policy
- Personnel Risk Management Procedure
- Remote Work Regulations

XTBS.A. Group subsidiaries have their own procedures and regulations tailored to their needs and local law.

The Work Regulations at XTBS.A. are the fundamental document regulating employee rights and obligations, emphasizing the creation of a productive and inclusive work environment, ensuring compliance with legal standards and promoting employee well-being. The Regulations define occupational health and safety principles and guidelines for conduct, rights, and responsibilities, with the aim of supporting both organizational goals and individual development within the company. Remote work at XTBS.A. is governed by separate remote work regulations.

The Human Resources Policy of XTBS.A. aims to support effective human resources management through employment planning, an effective recruitment process, development

support and retention of a team of employees who will ensure the implementation of the company's planned business activities with appropriate quality.

The XTBS.A. Remuneration Policy defines the principles and conditions for remuneration and work-related benefits at XTBS.A., as well as the related rights and obligations of employees and the employer.

Anti-Mobbing and Anti-Discrimination Policy is a response to the goals of the ESG Strategy. It summarizes principles, sets standards for cooperation and counteracting instances of mobbing and discrimination, and promotes positive attitudes among employees. The policy aims to support the development of a responsible and ethical organizational culture, employee awareness, and best practices.

Diversity, Equal Treatment and Inclusive Culture Management Policy

S1-1 MDR-P 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. of Statement). The policy was implemented by the Talent Department and adopted by resolution of the Management Board. It organizes the most important areas of action in supporting and building a diverse and inclusive organization. It defines rules of conduct based on respect, acceptance, and equality in pay, education, and recruitment, providing an opportunity to report violations. The document has been communicated and is familiar to employees.

MDR-T Despite the lack of set goals and indicators to measure the effectiveness of the Diversity Policy, its effectiveness is monitored through identified cases of violations.

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 implementing the guidelines of the International Labour Organization Convention, XTB declares that it does not use forced labor in all its forms and confirms that it does not employ children or young workers. 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.

The remaining employee policies and regulations were implemented at XTB prior to the double-materiality test and are not directly related to the identified significant impacts, opportunities, and risks. They are aligned with XTB's strategy and are intended to support effective human resources management through the effective selection, support, and retention of employees, including:

- 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.

All entities within the XTB Group are guided by the Headquarters' employee policies, after adapting them to the individual's needs and the local legal and regulatory environment. The Talent Department is responsible for implementing, monitoring, and updating employee policies at XTB Headquarters. All policies in force within the XTB Group are communicated, publicly available, and known to employees.

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.

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. 32 presents the percentage of employees who exercised this right in 2025 in accordance with the employment status as of 31.12.2025 and comparative data for 2024.

S1-15 Table 32. Work-life balance indicators for employees for 2025 and 2024

Reporting period	2025				2024				2025	2025	2025/2024
	Women	Men	Others	Not disclosed	Women	Men	Others	Not disclosed	Total		
% of employees entitled to parental leave	100%	100%	100%	-	100%	100%	-	-	100%	100%	0 p.p.
% of eligible employees who have taken parental leave	4,8%	1,4%	0,0%	-	7,8%	5,2%	-	-	2,5%	6,1%	-3,6 p.p.

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, candidates 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 their superiors, employee representatives or by contacting the Talent 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.

In 2025, a clause informing job candidates about the possibility of reporting abuse in Polish and English was introduced. This clause was added to application forms in all recruitment projects as a post-audit recommendation from the National Labor Inspectorate.

S1-17 The XTB Group monitors the number of complaints filed regarding mobbing and discrimination and reports them annually in its sustainability reporting.

In 2025, no cases of mobbing or harassment were identified, and no serious incidents concerning respect for human rights or discrimination were reported. In 2025, three labor law cases were pending in one of our branches. As of the date of this Statement's publication, the proceedings had not been resolved.

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 Sustainability Team.

Significant impacts, opportunities, and risks are managed through the Talent Department, which assesses team needs and attitudes, represents employees before the Management Board, and implements specific HR initiatives. To counteract significant negative impacts and mitigate risks, in 2024, we implemented an Anti-Mobbing and Anti-Discrimination Policy at the XTB S.A. Headquarters, as well as a Diversity Inclusion Policy (DEI), which will remain in effect in 2025. In 2025, we continued the competency assessment process to standardize and transparent remuneration and bonuses across the XTB Group. We introduced uniform quarterly performance appraisal principles for employees across the XTB Group and goal-based bonus principles. We strive to improve working conditions and comfort to reduce employee turnover and attrition.

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 2025, 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 72,6% of total employment of XTB Group). In 2025, 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. The only foreign entity whose employees were covered by a collective bargaining agreement as of December 31, 2025, was the XTB S.A. branch in France. The number of employees covered by the collective bargaining agreement represents 1.9% of total employment under an employment contract in the XTB Group as of the last day of the financial year.



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 XTB Group tailors its offerings to client needs – this is primarily why we are constantly developing our portfolio of financial and investment products. At the same time, we conduct active marketing activities (e.g., with the participation of famous athletes), social media communication, and educational campaigns to reach a wide audience and build investment awareness. As a broker, we offer access to a wide range of instruments – including high-risk ones – while carefully informing them about the associated risk levels. At the same time, we are committed to investor education, for example, through the regular "Masterclass" conference, which attracts thousands of people interested in investing every year.

In 2025, we reviewed the significant impacts, opportunities, and risks of consumer engagement identified in the 2024 *Double materiality assessment*. Cybersecurity risks were identified, as described in Chapter 1.6 of the *Statement*.

SBM-2 / S4-2 / S4-4 / S4-5 In reporting for 2025, we consistently rely on the results of the 2024 double materiality assessment. A selected group of individual and institutional clients took part in the study, ones with the highest activity to participate in a double materiality assessment. This allowed us to better understand their needs and supplement the survey results with real data. Based on this information and the results of the survey, in July 2024, we updated our ESG strategy for 2024–2027 and defined our mission, vision, and strategic directions for development—although we did not set specific numerical targets for managing impacts, risks, and opportunities. We consistently implemented this strategy in 2025.

As a provider of investment and financial services, we influence clients through the quality of our communication, offerings and documentation, the level and availability of service, contact channels, educational materials, decisions supported by customer feedback analysis, and information transparency. All of this helps minimize the potential negative consequences of our collaboration. We monitor the effectiveness of our efforts by analyzing online customer reviews, the level of interest in XTB services, and through contact with the Customer Service department.

In the Double Materiality Assessment, we identified significant impacts, both positive and negative. Potential negative impacts include the impact that may result from insufficient attention to customer opinions and needs, the impact associated with insufficient investment knowledge and a lack of understanding of the specifics of investment products, which carry the risk of loss, and the impact of inappropriate communication activities. To minimize the risk of these impacts, the XTB Group analyzes customer feedback collected from various sources, one example of which is the continuous expansion of its product offering, which opens up to the preferences of new investor groups. We also strive to ensure that all information issued by XTB, whether regarding products or the XTB investment application, press releases, and marketing campaigns, is transparent and factual, avoiding any signs of greenwashing.

We also strive to minimize identified risks in the client area: we minimize product risk and reputational damage associated with customer complaints resulting from, for example, XTB

service failures, misunderstandings of XTB documents and agreements, or undertaking investment risks despite insufficient investment preparation (e.g., by investing in leveraged financial instruments) through transparent contractual provisions and investor education campaigns. We minimize the risk of client loss due to a decline in the quality of XTB services by ensuring the employment of appropriately specialized staff and maintaining attractive employment conditions for our employees.

We also identified real positive impacts and opportunities in the client area, based on publicly available reporting channels and high-quality customer service, educational materials, reliable product documentation, and media coverage based on proven performance.

The XTB Group identifies necessary actions in response to actual or potential negative impacts on consumers through structured 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](#).

The XTB Group ensures that processes enabling remedial action in the event of significant negative impacts are available and effective within the breach reporting procedure, contact form, and direct contact with customer service, and that each report is carefully and competently considered. To mitigate significant risks in this area, the organization undertakes and monitors actions to improve technology, the transparency of information processes, and the safety of XTB products. The company intends to continue these actions in subsequent reporting periods and is allocating appropriate human and material resources for this purpose. We are increasing employment and training experts to ensure high-quality customer service and efficient operational and management processes, which allow us to counteract negative impacts. Despite this, the XTB Group has not yet adopted formal, measurable goals in this area.

For years, our strategy and business model have been based on customer needs, taking into account the expectations of communities in various regions of the world. Contact with XTB

Group clients takes place at every stage of the relationship: from initial contact with a potential client, through contract execution, ongoing support, education, up to the end of the relationship. Clients can use various contact channels: a form on the website, a hotline, and the customer service department, ensuring easy access to information and reporting any issues. In 2023, we established cooperation with the Association of Individual Investors (SII), which strengthens our dialogue with investors and helps represent their interests. We improve our operations by analyzing our clients' opinions, submitted as part of the xStation application evaluation process or on websites and discussion forums. The collected opinions influence business decisions and the management of the impact on XTB clients. The highest-level structure managing client relations is the Management Board of XTB S.A. and the directors responsible for the operations of their customer service teams.

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).

Cybersecurity

The digital security of our clients and their financial resources is our priority. Therefore, in 2025, after reviewing significant opportunities, risks, and impacts, we identified the following management risk areas:

“Security risks associated with any activity aimed at criminals obtaining an access to customer accounts and assets, conducting unauthorized transactions and transferring funds, stealing confidential data, and DDoS attacks, which are significant factors influencing the risk of loss of resources for the company and its customers.”

We recognize the ever-increasing importance of security. We have organizational structures and cybersecurity experts who regularly compile statistics and reports, including for the Management Board. In 2025, we launched our first landing page entirely dedicated to cybersecurity, conducted an internal and external information campaign, and October 2025 was designated Cybersecurity Month. Employees undergo annual training, 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).

Our investment app allows authentication by password and additionally offers access security by code or biometrics. Since 2025, clients have been logging in to the XTB investment app using so-called 2FA, or two-factor authentication.

Our team is responsible for overseeing and ensuring process compliance with applicable standards, with particular emphasis on the ISO 27001 standard for information security management systems. This team monitors the implementation and maintenance of procedures (including business continuity), conducts regular internal reviews, identifies areas requiring improvement, and coordinates activities necessary to maintain compliance with the standard's requirements, ensuring effective risk management and protection of information assets.

Periodically and as needed, we conduct reviews of documentation, processes, procedures, and systems against the requirements of applicable standards (including ISO 9001, ISO 27001, and ISO 22301) and the DORA regulation by external auditors. These tests/audits confirm compliance with international standards, the effectiveness of implemented policies, procedures, and control mechanisms, the maturity of the management system, emergency and risk preparedness, and commitment to quality, information security, the environment, and more.

Accessibility at XTB

In line with the European Accessibility Act (EAA), a legal act on accessibility implemented across the EU in mid-2025, which extends accessibility obligations to many private companies offering digital services, we have taken steps to adapt to the new requirements. In addition to external training for designers, developers, and testers, we have also conducted internal training for testers, administrative staff, and sales staff on implementation, accessibility testing, and assistance and support for people with special needs. In 2026, additional groups of XTB employees will be included in the training.

In 2025, we implemented client documentation for individuals with special needs (available in the Accessibility tab on the xtb.com website) and a dedicated email address: dostepnosc@xtb.com. This work will continue in the coming years. The actual implementation

of accessibility in our services is systematically reported through declarations submitted to the Financial Ombudsman.

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 added a "Complaints" section to our website, containing the most important information regarding the complaints process, including:

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

They comprehensively describe the complaints process, including the client's rights and obligations. Information on filing a complaint is also available in the Education section of the XTB website. XTB clients have several channels to choose from to submit 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.

Customers can submit complaints/claims to report their concerns and any irregularities they have identified. In 2025, we received a total of 9 565 complaints from consumers and end users of the Group, compared to 6 816 complaints in 2024 (+40% y/y). This can be attributed to the increase in the number of customers (+59% y/y). The number of complaints received in 2025 represents 0.4% of the total number of 2 164 867 customers as of December 31, 2025 (p.p. y/y). Similarly to last year, the most common complaints in 2025 were related to, i.a., 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.

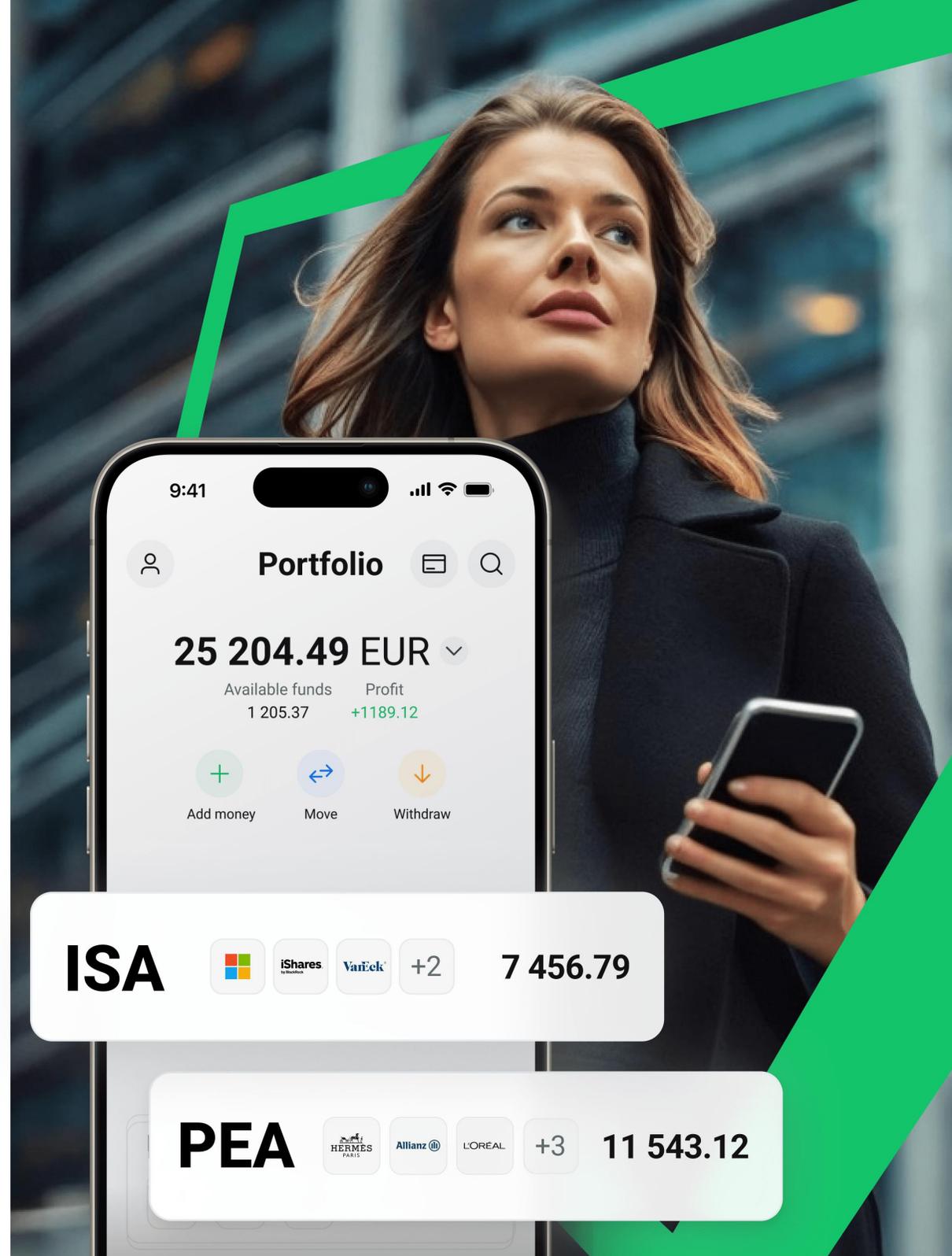
4.3 Corporate culture and business ethics

4.4 Risk management and internal control

4.5 Supplier relationship management

4.6 Due diligence statement

Governance



9:41

Portfolio

25 204.49 EUR

Available funds 1 205.37 Profit +1189.12

+ Add money ↔ Move ↓ Withdraw

ISA



+2

7 456.79

PEA



+3

11 543.12

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.

In 2025, while reviewing impacts, opportunities, and risks identified in the 2024 double materiality assessment we identified ESG risk related to cybersecurity. More information may be found in Chapter 1.6. of the *Statement*.

4.2. Administrative, management and supervisory bodies

As of 31.12.2025, 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 above-mentioned documents constituting the Company's corporate governance are publicly available on the XTB Group's ESG website in the Corporate Governance tab at:

<https://esg.xtb.com/pliki/pliki-do-pobrania-pl/>

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

GOV-1 Role of administrative, management and supervisory bodies

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 chapter in the *Management Board Report of the XTB Group, Corporate Governance, chapter Statutory Bodies of XTB*.

The Management Board of XTB S.A.

The current composition of the Management Board of XTB S.A. was appointed on June 25, 2025 by resolutions of the Supervisory Board of XTB S.A. regarding the appointment of the current five-member Management Board for a new joint three-year term of office (from July 2, 2025 to the end of July 2, 2028).

In 2025, in accordance with XTB S.A. current report No. 5/2025 dated March 31, 2025, Mr. Andrzej Przybylski, former Member of the Management Board for Risk, resigned from running for another term of office and ceased to serve as a Member of the Management Board, effective July 1, 2025. On August 26, 2025, by resolution of the Supervisory Board, Mr. Bartosz Osiński was appointed as a new Member of the Management Board of XTB, and on December 1, 2025, the company received a decision from the Polish Financial Supervision Authority, according to which the Authority consented to the appointment of Mr. Bartosz as the Member of the Management Board for Risk.

As of 31.12.2025 and at the date of publication of this Statement, the Management Board of the Company remained 100% independent with unchanged composition, men constituted 100% of the Company's governing body:

Table 33. Composition of the Management Board of XTB S.A. as of 31.12.2025 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	02.07.2028
Filip Kaczmarzyk	Member of the Management Board	10.01.2017	02.07.2028
Paweł Szejko	Member of the Management Board	28.01.2015	02.07.2028
Jakub Kubacki*	Member of the Management Board	10.07.2018	30.06.2026
Bartosz Osiński	Member of the Management Board	01.12.2025	02.07.2028

*Pursuant to CR No. 3/2026 of March 3, 2026, Mr. Jakub Kubacki resigned from the position of member of the Management Board of XTB S.A. with effect from the end of June 30, 2026.

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 34. 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
Jakub Zabłocki	Member of the Supervisory Board	14.05.2025	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 67% and women made up 33% 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 chapter 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 (supervising the area of XTB sustainability)
- 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 in [Investor Relations XTB website](#) 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 2025, the results of the XTB Group Double Materiality Study were discussed, which were reviewed in 2025 and adjusted to the current situation of the XTB Group, as well as the updated tax strategy of XTB S.A. for 2025-2028.

We support the development of our corporate culture through:

- competitive and flexible terms and conditions of employment,
- values, strategy, procedures and policies,
- celebrating successes together
- bilingual communication via internal intranet, xPress newsletter 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;
- Diversity Policy (DEI) of XTB S.A. in place.

MDR-P Our activities in the area of corporate culture and ethics are supported by internal documents in XTB S.A., which include, i.a.:

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

XTB Group subsidiaries have their own policies and procedures, modelled on the policies of XTB S.A., but adapted to the organizational needs of the teams and the formal and legal environment.

The XTB S.A. Articles of Association define the company's organizational structure, including the operating principles of the management board, supervisory board, and general meeting. It also contains information regarding the share capital, shareholder rights, and procedures related to the issuance of shares.

The **XTB S.A. Management Board Regulations** define the operating principles of the management board, including its powers, responsibilities, and decision-making procedures. The **Supervisory Board Regulations**, in turn, contain the principles for overseeing the company's operations, including the method of monitoring the management board's work and procedures related to financial and operational control.

The **XTB S.A. Code of Ethics** defines the standards of behavior and values that should guide the actions of XTB employees and the management board. It includes principles of honesty, social responsibility, and transparency in business relationships.

Information regarding the DEI Policy, the Anti-Mobbing and Anti-Discrimination Policy, the Anti-Corruption Policy, and the Work and Remuneration Regulations are described in the chapters relevant to each topic.

We build an organisational culture based on values:



We assess our organisational culture through an annual employee satisfaction survey conducted by the Talent Department (HR).

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 2025, 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 2025, 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 are covered. Operationally, the area of identifying particularly exposed functions and training is new for XTB, and in 2025, training was provided for the first time to persons performing particularly exposed functions in XTB S.A. and its foreign branches, as well as members of the Supervisory Board and Management Board of XTB S.A.

Table 35 on the next page of the Statement presents information on trained XTB Group employees and associates, in accordance with the ESRS template. In 2025, both the number of individuals trained and the training time per individual increased, which is related to the implementation of training for individuals performing roles particularly exposed to corruption risk at the Headquarters and branches of XTB S.A. Training conducted across the Group took the form of a blended approach: in-person, online, and via online platforms.

G1-3 Table 35. Training on anti-corruption and bribery

Reporting period	Management and Supervisory Board		Directors and managers		Other employees		Individuals cooperating under civil law contracts		Total		
	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025/2024
Number of identified people at risk of corruption	13	11	158	153	245	218	6	7	422	389	+8,5%
Number of people at risk and trained	11	1	114	25	206	42	3	3	333	71	+369
Number of people eligible for training	13	11	158	153	245	218	6	7	422	389	+8,5%
% of people performing function exposed to a risk of corruption covered by training programmes*	85%	9%	72%	16%	84%	19%	50%	43%	79%	18%	+61 p.p.
Time of training per 1 identified person (h)	0,82	1,55	1,47	0,84	5,48	0,32	0,59	2,43	3,77	0,60	+528,3%
Time of training per 1 trained person (h)	0,97	1,65	2,04	5,12	6,53	17,00	1,17	5,67	4,77	3,26	+46,3%

*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.

To prevent, detect and respond to allegations and incidents of corruption and bribery in the reporting period:

- 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,
- Anti-Corruption Policy principles were applied;
- rules on accepting gifts and souvenirs were applied;
- In accordance with the provisions of applicable law, conversations conducted with XTB clients are recorded,
- Anti-corruption training was conducted for new employees, members of management and supervisory bodies, and individuals performing roles particularly exposed to corruption risk,
- quarterly alerts were sent to individuals performing roles identified as particularly exposed to corruption risk, as well as to all employees.

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 HQ and branches and 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 2025, we expanded our sustainability efforts by refining existing solutions and continuing our previous efforts. We streamlined our ESG processes, identified significant impacts, opportunities, and risks, and set strategic directions for the coming years. We implemented a data collection mechanism for the XTB S.A. Capital Group and aligned reporting with the requirements of the Corporate Sustainability Reporting Directive (CSRD). This created a solid foundation for developing sustainability and raising awareness and standards within the XTB Group.

The highest decision-making body in matters of ESG risks is the Management Board of XTB S.A. The ESG risks identified as part of the dual materiality process, in accordance with the strategy for 2024-2027, have been adapted to the internal risk management system and incorporated into it.

Responsibility for the completeness, reliability, and accuracy of the data required for reporting rests with experts from various areas of the XTB Group's operations. The entire ESG reporting process is coordinated by the Sustainability Team, which collects, consolidates, and analyzes information and publishes it in the report. All employees involved in data provision receive ongoing support from the Team, and data collection is performed using common, proprietary tools available to the entire XTB Group.

The correctness of the reporting process is personally supervised by the Management Board Member for Finance and members of the Management Board of XTB S.A. From 2025, the internal auditor representing the internal audit unit of XTB S.A. will regularly review published sustainability statements and conduct an ESG audit at least once every two years. The internal auditor reports organizationally to the President of the Management Board and

functionally to the Chair of the Audit Committee, in accordance with the Internal Audit Regulations.

The Internal Audit Department's primary responsibilities include assessing the accuracy and effectiveness of internal processes, regulations, and procedures. The internal auditor also serves as an advisor to other organizational units, including those responsible for risk management, ESG, and reporting.

XTB S.A. also includes a Risk Control Department, responsible for implementing a risk management system covering the Company's operational activities, with particular emphasis on risks arising from ESG. The Risk Control Department is managed by the Management Board Member for Risk, while legal and compliance matters are overseen by a separate legal team led by the Management 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 serve to identify, measure, and mitigate risks and to establish limits that limit the scale of exposure to these risks.

The Supervisory Board also includes a Risk Management Committee and an Audit Committee, which functions as a separate oversight body.

4.5. Supplier relationship management

G1-2 / G1-5 / G1-6 We maintain long-term and stable relationships with suppliers, based on reliable communication and responsible payment practices. Our analysis has not yet identified key supplier-related opportunities or risks, due in part to the non-production nature of our business and our collaboration primarily with regulated institutions and partners within the European Union. When selecting suppliers, we are guided by their impeccable reputation and an assessment of our ongoing collaboration. As of the date of this Statement's publication, we did not consider environmental or social criteria when selecting suppliers.

Supply chain risks and sustainability impacts are minimised. 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 XT B 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 XT B 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 2025, 74% of payments made on the scale of the XT B Group were made in accordance with the adopted payment standards (-4 p.p. y/y).

G1-6 MDR-P The XT B 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 XT B 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 36. Standard payment rules at XT B Group in 2025 and corresponding year 2024

Reporting period	2025	2024	2025/2024
Average number of days needed to pay an invoice from the start of the contractual or statutory payment period	15	15	0%
Number of pending legal proceedings for late payment	0	0	0
Standard payment terms (average number of days)	14	14	0%
Number of payments made according to standard conditions	27 844	21 971	+27%
Total number of payments made	37 792	28 280	+34%
% of payments compliant with the standard payment conditions	74%	78%	-4 p.p.

4.6. Due diligence statement

GOV-4 Striving for sustainable business operations is a complex, long-term process that requires a careful and thoughtful approach across the entire XTB Group. We understand due diligence as a series of activities aimed at monitoring, improving, and verifying the effectiveness of implemented solutions. This process is designed to operate in parallel with the business throughout its lifecycle, supporting enterprise development through the improvement of strategic and operational processes.

Throughout the XTB Group's operations, we are guided by the principles set out in the international United Nations (UN) Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. As a company listed on the Warsaw Stock Exchange and regulated on major financial markets, we conduct our business in accordance with the recommendations of the Polish Financial Supervision Authority and local regulators. In this way, we exercise due diligence in all processes, including in the area of sustainable development, ensuring respect for human rights, fair practices, and transparency.

Table 37. 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	E, S, G	Chapter 1.3. Sustainability management Chapter 1.5. Key stakeholders

that the entity influences

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
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 impacts on people and the environment	E, S, G	Chapter 2.1.1. The XTB's Group's climate policy
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

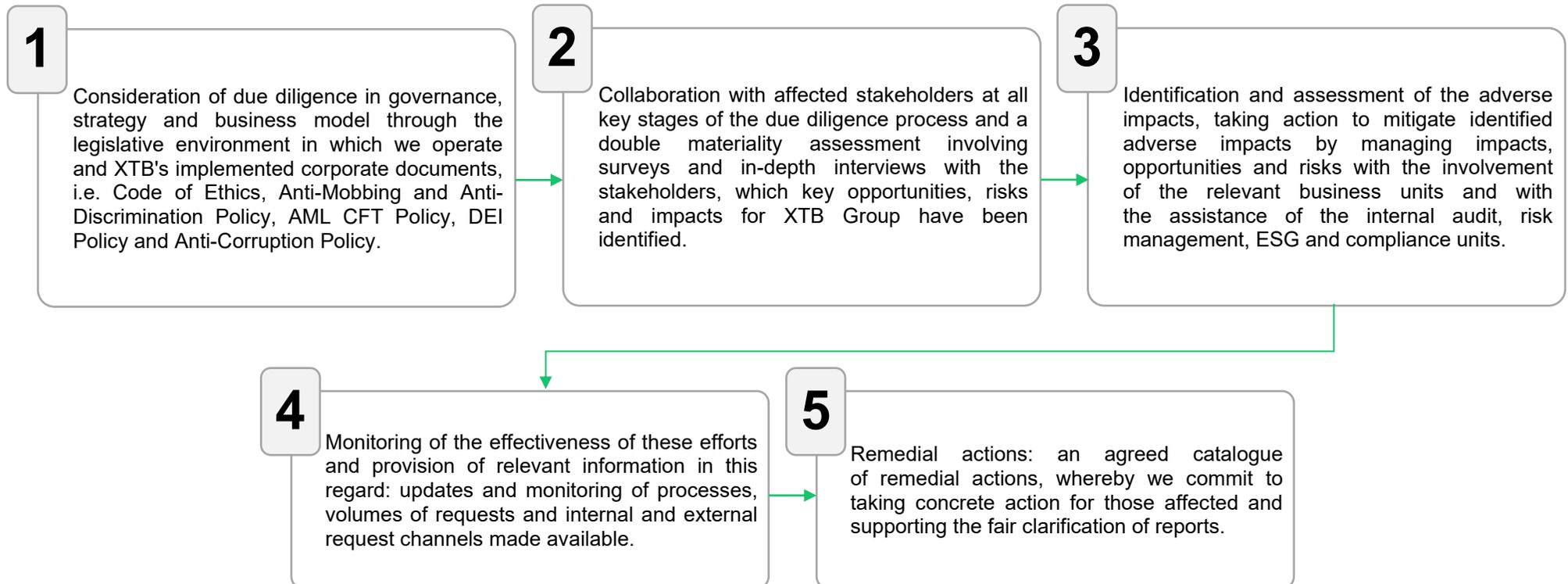
At the XTB Group, we have been implementing due diligence processes for years with the help of the Legal and Compliance department, which is partly driven by the nature of XTB's business as a financial institution listed on the Stock Exchange since 2016, but also by the need to develop the business as 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 38. 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 39a. 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 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 for transition (%)	Of which supporting (%)													
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 39b. 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 systematic assets (%) (eligible for systematics)				Of which EU systematic assets (%) (eligible for systematics)			Of which EU systematic assets (%) (eligible for systematics)			Of which EU systematic assets (%) (eligible for systematics)			Of which EU systematic assets (%) (eligible for systematics)			Of which EU systematic 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 for transition (%)		Of which supporting (%)		Of which for transition (%)		Of which supporting (%)		Of which for transition (%)		Of which supporting (%)		Of which for transition (%)		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*	1001,38	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	1001,38	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 40. 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 for transition (%)		Of which supporting (%)		Of which for transition (%)		Of which supporting (%)		Of which for transition (%)		Of which supporting (%)		Of which for transition (%)		Of which supporting (%)		Of which for transition (%)		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%	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%	0%	0%	0%		
3.	Execution of orders on behalf of the client	41.99	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%	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%	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%	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%	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 41. 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 42a. 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 42b. 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 43a. 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 43b. 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 44a. 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 of 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 of 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 of 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 44b. 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 45a. 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 45b. 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	1 001.38	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	1 001.38	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	1 001.38	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	1 001.38	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	1 001.38	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	1 001.38	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	1 001.38	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	1 001.38	100%

Table 46a. 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.	41.99	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.	41.99	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.	41.99	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.	41.99	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.	41.99	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.	41.99	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.	41.99	100%
8.	Total amount and total share of economic activities not eligible for systematics in the denominator of the applicable key performance indicator.	41.99	100%

Table 46b. 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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