ESG STRATEGY

XTB GROUP

2024-2027

Warsaw, 07.2026

“Where your money works”

XTB is an entity operating in the financial sector, offering access to investment products through its proprietary digital platform and “all-in-one” investment application.

XTB’s investment application helps over 2.5 million people worldwide make their money work in multiple ways (as of 30.03.2026). We are a Polish fintech successfully exporting our proprietary investment technology to European countries, but also to South America, the Middle East, and Asia. With 17 offices worldwide, XTB is a trusted employer for over 1500 people. XTB Group’s current organizational structure is available on the ESG website.

The ESG Strategy regulates the area of sustainability within the XTB Group, and its oversight is performed by the Management Board of XTB S.A. The first XTB ESG Strategy was introduced in 2021, and the second and simultaneously last revision was adopted by a resolution of the Management Board on 07.07.2026. This update aligns with the organization's priorities and needs, ensuring that the strategic goals established in 2024 are consistently implemented over the 2024–2027 horizon, in line with the XTB Group's available resources and capabilities.

XTB Mission and Vision

Mission

We democratize the world of investment through an advanced investment application and financial education, which support users in independently managing their investment portfolio in accordance with their goals, preferences and investment horizon.

Vision

We provide the investment application of first choice for clients from Europe, setting standards for access to financial markets and supporting the management of one's own finances in a simple and effective way for people with different levels of experience.

XTB Value System

SUPPORT

- XTB Offer
- Customer Service
- Educational Materials
- Information Campaigns
- XTB Foundation

TECHNOLOGY

- Investment App
- Extensive IT Infrastructure
- Expert Resources
- Cybersecurity
- Innovations and Processes

TRUST

- Regulated Activity and Financial Supervision
- System Security
- Audit, Compliance, Risk Management
- Current and Periodic Reporting
- Communication with Investors

XTB Value System

The values that form our organizational culture favor building relationships with stakeholders based on trust, technology and support.

POWER THROUGH TECH	Technology is our advantage. We create, automate and scale intelligent solutions.
Own & Deliver	We take ownership and consistently achieve our set goals.
Grow Together	We build a culture of collaboration and skills development, where individual growth drives our shared success.
Think Deep & Act Fast	We combine data analysis, critical thinking, and experience to make accurate decisions and efficiently deliver concrete results.
High Bar & Fair Play	We set high standards and apply them consistently across the organization. We operate transparently, recognize performance, and make sound decisions.

TRUST

TECHNOLOGY

SUPPORT

Society

Society

We build relationships with stakeholders based on clear principles of cooperation and activities of the XTB Group and well-thought-out business decisions. Among the key stakeholders, we identify, among others, our individual and institutional clients, XTB employees and associates, and regulatory entities in the markets appropriate for our activities.

In the employee area, we focus on transparency and consistency of remuneration and employee assessment rules. In accordance with the assumptions of a "high performance" culture, we focus on creating a work environment based on respect, fairness, and efficiency, and as consistent and objective assessment rules as possible. Our team consists of people with diverse competences and experiences, to whom we provide conditions for professional development and the realization of goals within the organization.

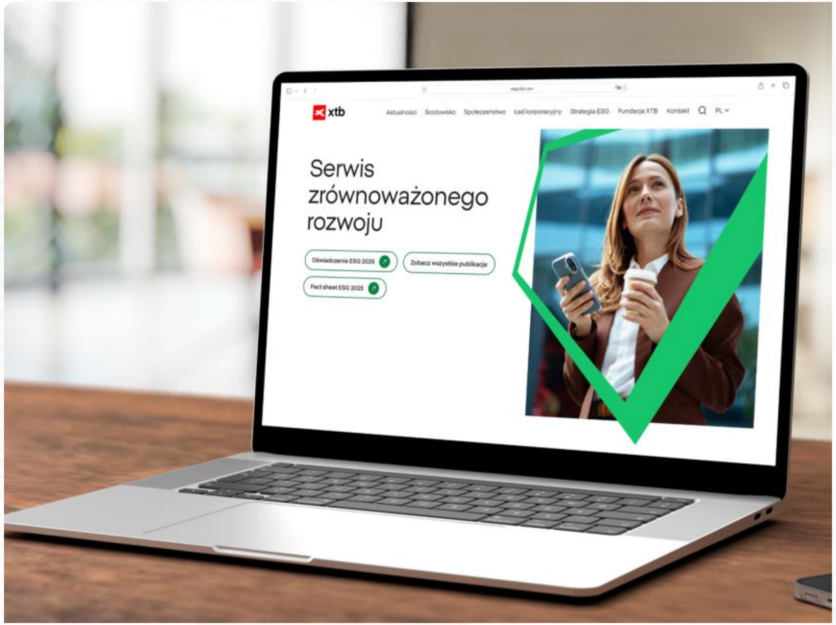
In the social area, we conduct educational activities in the field of finance. We are developing a database of materials including articles, video recordings, and market comments, and in cooperation with the XTB Foundation, we implement initiatives addressed to school youth, including the "Academy of Tomorrow. Finance with class" program.

In accordance with XTB's business model, we are expanding our product offer, which translates into the development of our business, building a competitive advantage, and long-term value for shareholders.

Society

Social relations in the XTB Group include, among others:

- financial education: XTB Investing Masterclass, participation of experts in conferences and industry events and an open database of educational materials
- flexible employment conditions, benefits and training appropriate to the positions and the possibility of using two days a year for employee volunteering during working hours
- consistent employee assessment and remuneration system, including performance-based bonus rules, internal recruitment and transparent promotion rules
- initiatives for employees: including promotion of an active lifestyle (sports classes), annual cancer prevention check-ups, first aid training, "To The Moon" Ambassador Program, access to the "Helping Hand" online platform, annual employee satisfaction survey
- Code of Ethics, Policies: Anti-mobbing and Anti-corruption, Diversity Policy and Whistleblowing Policy; we are a signatory of the Diversity Charter
- internal and external communication: xPress newsletter, Town Hall, ESG website and investor relations website, stock exchange communication



Society

XTB Foundation

Corporate social responsibility activities are implemented within the parent company XTB S.A. and the XTB Foundation, established in 2020.

In accordance with its Statute, the XTB Foundation focuses on developing activities in areas including, among others:

- raising awareness and economic and financial knowledge, as well as influencing the increase of trust and respect for financial institutions
- supporting and organizing all initiatives related to the promotion of financial institutions and new technologies
- promotion of employment and education as well as leveling opportunities for development
- initiating and supporting the activities of XTB Group employees, related to the statutory goals of the Foundation, employee volunteering and any social, educational and sports activity
- charitable and social activities

Society

Strategic direction

We increase the accessibility of financial markets through the development of our proprietary investment application and by providing free educational materials. At the same time, we are building an organizational culture based on team diversity, uniform assessment and remuneration standards, and the development of digital and managerial competencies.

Our goals

for the strategic years 2024-2027.

Updating the remuneration system and identifying the pay gap of the XTB Group

- implementation of uniform assessment and remuneration principles in the XTB Group, including performance-based bonus rules
- calculation of the XTB Group pay gap in accordance with ESRS

Creating a safe and inclusive work environment

- introduction of cyclical first aid training for HQ employees
- implementation of the Diversity Policy (DEI)

Development of the XTB Foundation's activities

- initiatives and activities of the XTB Foundation, especially in the field of financial education

Corporate governance

Corporate governance

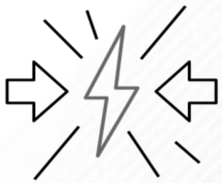
The corporate governance area in the XTB Group includes, among others:

- presence of XTB S.A. on the Warsaw Stock Exchange and current and periodic reporting in accordance with the Act on Public Offering
- oversight by local regulatory and supervisory authorities in the markets where XTB companies and branches operate, including: KNF, FCA, DFSA, CySEC, Bappebti Indonesia, and SCA
- communication with investors through earnings conferences, investor relations website and ESG service, newsletter, dedicated e-mail address, participation of Management Board representatives in conferences and investor meetings
- data security and cybersecurity provided by experts, organizational systems, and procedures
- membership in industry organizations, i.e., Chamber of Brokerage Houses
- internal audit, compliance, and risk and process management system
- formal and legal support approved by the XTB S.A. Management Board (ESG policy, AML policy, Anti-corruption policy, etc.)
- division of responsibility for key business areas of the XTB Group among Management Board members according to their competencies
- sustainable development area managed by the Management Board Member for Finance
- whistleblowing mechanism

Corporate governance

XTB S.A. has a Code of Ethics in place, which defines basic standards, rules of conduct and values that XTB employees should follow:

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



regarding loyalty, honesty and conflict of interest - including provisions defining situations in which an unacceptable conflict of interest may occur

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

Corporate governance

Strategic direction

We consistently strengthen the digital resilience and business continuity of the XTB platform, treating the protection of personal data and client assets as a key foundation of corporate governance. Our priority is transparency of management structures, rigorous anti-fraud measures, and responsible risk management at every level of the organization.

Our goals

for the strategic years 2024-2027.

Inclusion of ESG aspects in the area of corporate governance

- implementation of Anti-Mobbing Policy and Anti-Corruption Policy
- update of the XTB Group Code of Ethics

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

- identification and integration of ESG risks with the XTB Risk Management System

Environment

Environment

The core activity of the XTB Group consists of providing financial services, in particular online trading of financial instruments. In addition to administrative and office activities, XTB's operations rely on an IT infrastructure that ensures business continuity and uninterrupted service delivery.

In response to the ESG reporting obligation, since 2024, we have been identifying our environmental impact by calculating the full carbon footprint of the XTB Group (in Scope 1, Scope 2, and the Scope 3 categories applicable to the XTB Group's activities). Integrating sustainable development procedures, in 2026 we replaced the Climate Policy with the ESG Policy, which reflects the organization's priorities and approach to ESG.

For a description of the XTB Group's activities in the environmental area, please refer to the sustainability statements available on the ESG website.

Environment

Strategic direction

We focus on building transparency within sustainability reporting and carbon footprint calculation of the XTB Group in accordance with the applicable ESRS reporting standards.

Our goals

for the strategic years 2024-2027.

E-waste management

- introduction of provisions regarding e-waste management
- monitoring of e-waste in the XTB Group for reporting purposes

Calculation of the full carbon footprint of the XTB Group

- calculation of greenhouse gas emissions in three scopes within ESG reporting

Development and implementation of a Climate Policy*

- scenario analysis, climate risk identification; incorporation of Climate Policy into ESG Policy

*integrating ESG procedures: in 2026, the Climate Policy (implemented in 2024) was incorporated into the ESG Policy

Contact

This presentation has been prepared by XTB S.A. for informational purposes only. The information and data presented within the ESG Strategy are based on current assumptions, industry best practices and available data, and are subject to change. ESG goals and initiatives do not constitute a guarantee of specific results or legal obligations. Despite every effort to ensure the information is accurate and reliable, uncertainties, risks or changes in market, regulatory or environmental conditions that may affect the achievement of the presented goals cannot be excluded. This presentation should not be treated as an investment recommendation or as a commitment to perform specific actions. In the event of any discrepancies between the language versions, the Polish version shall prevail.

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