



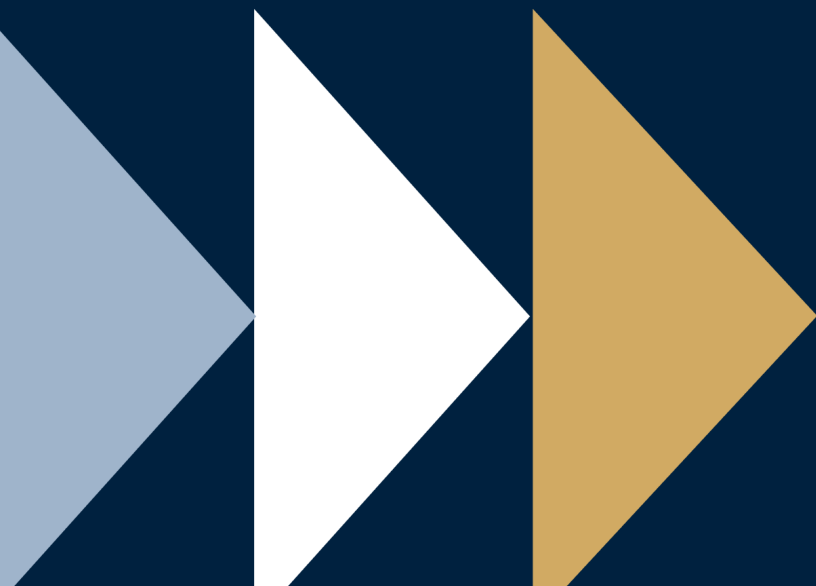
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# Non-financial Report 2025

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# A | Introduction



# Introduction

In fiscal year 2025, our actions were again shaped by a wide range of global challenges. Ongoing geopolitical conflicts, economic policy measures such as U.S. tariff policies, general political tensions, and the potential resulting impacts on the short- and long-term development of individual industries and the global economy, as well as the tangible consequences of climate change with increasing extreme weather events, shaped the conditions under which people save and invest. At the same time, capital market-oriented investments continue to gain importance as a central pillar for long-term wealth accumulation and private retirement planning.

It is precisely in such an environment that we are committed to standing by our clients as a reliable partner. As a pan-European investment platform for self-directed investors, we provide millions of people in 16 countries with simple, secure, and price-transparent access to global capital markets. Our vision of being Europe's leading investment platform for wealth building guides our actions, as do our clear guiding principles: We put our clients' interests first, offer outstanding market access at low costs, are reachable through various channels (call center, email, chat), and thus combine local proximity with global access. At the same time, we ensure a high level of security for the assets entrusted to us, promote financial literacy, and support the communities where we operate so that more people can make informed decisions about their financial future.

Sustainability is an integral part of our business model and our management. We systematically integrate environmental, social, and governance aspects into our business strategy, risk management, and internal control system, and consistently align our sustainability management with growing regulatory requirements, in particular the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). Based on the materiality assessment we conducted, we are embedding the concept of double materiality into our processes: We consider both the impacts of our business activities on

the environment and society, as well as sustainability-related opportunities and risks for the Group. We regard compliance with regulatory requirements, such as the EU Taxonomy Regulation, the BaFin guidance on managing sustainability risks, and the Minimum Requirements for Risk Management (MaRisk), as the minimum standard.

A key pillar of our identity is the responsible treatment of our employees. Diversity, equity and inclusion form the foundation of the work environment we create for our colleagues. Flexible work models, attractive development and training opportunities, a modern approach to learning, and initiatives to promote health and work-life balance help us attract and retain skilled professionals while offering them prospects within a dynamically growing, technology-oriented company.

In this non-financial report for the 2025 fiscal year, we transparently outline how we fulfill our responsibilities toward the environment, our employees, society, our customers, and in the areas of corporate governance and compliance. We explain how we promote access to and development of capital markets, integrate sustainability risks and opportunities into our management, gradually reduce our environmental footprint, and further develop our corporate culture in the spirit of sustainable development. The report invites all stakeholders to engage in dialogue and underscores our commitment to consistently advancing flatexDEGIRO's sustainable orientation.

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# General information

## BP-1 – General basis for preparation of the sustainability statement

### Explanatory notes on the separate non-financial group report

With this document, flatexDEGIRO SE presents its fifth separate non-financial statement (hereinafter: non-financial statement). It supplements the consolidated financial statements and the combined management report of flatexDEGIRO SE and complies with the requirements of the German Commercial Code (HGB) and meets the requirements of the CSR Directive Implementation Act (CSR-RUG) at the company and group level for a non-financial group statement pursuant to Sections 315b and 315c HGB as well as Section 340a (1a) HGB in conjunction with Sections 289b through 289e HGB for a non-financial statement, as the Corporate Sustainability Reporting Directive (CSRD), Directive (EU) 2022/2464 had not yet been transposed into national law in Germany at the time of preparation.

The reporting period of the non-financial report corresponds to the calendar year 2025. Unless otherwise indicated, the information relates to the scope of consolidation of the IFRS consolidated financial statements of flatexDEGIRO SE.

Starting with the 2025 reporting year, flatexDEGIRO SE is systematically aligning its non-financial report for the first time with the requirements of the CSRD (Directive (EU) 2022/2464) and the European Sustainability Reporting Standards (ESRS, Delegated Regulation (EU) 2023/2772), which expand the transparency and quality requirements for reporting on environmental, social, and governance topics. For the 2025 fiscal year, flatexDEGIRO SE is publishing a separate non-financial group report under the voluntary application of the ESRS as a framework within the meaning of Section 289d of the German Commercial Code (HGB). This statement contains the required non-financial information for both the flatexDEGIRO Group and flatexDEGIRO Bank SE. No separate application of an additional framework within the meaning of Section 289d of the German Commercial Code (HGB) is made for the parent company.

The transition to the ESRS as the reporting framework formally represents a departure from the consistency principle compared to previous reporting. This deviation is justified by the strategic significance of the ESRS as the reporting standards adopted by the European Commission for the future structure of the non-financial statement. From flatexDEGIRO SE's perspective, the voluntary application of the ESRS comes closest to the spirit and purpose of the CSRD. The CSRD requires that comprehensive information on environmental, social, and governance aspects, structured in accordance with the ESRS, be provided and, in principle, subjected to an external audit. In the absence of national implementing regulations currently in force in Germany, there is no legal obligation to conduct such an audit for the 2025 fiscal year. Against this background, the Supervisory Board of flatexDEGIRO SE has decided not to subject the separate non-financial group report for the 2025 fiscal year to a voluntary external audit.

In light of the future CSRD framework, under which sustainability reporting is to be an integral part of the (consolidated) management report, the chosen form of publication constitutes a formal deviation. In accordance with the relevant IDW pronouncements, this is transparently identified as a "separate publication"; the combined management report will contain an explicit reference to this sustainability statement and its location.

Within the non-financial report, material risks must be reported in accordance with Section 289c(3)(3) and (4) of the German Commercial Code (HGB), provided that the disclosures are necessary for understanding the course of business, the business results, the Group's situation, and their effects on non-financial matters. flatexDEGIRO views risk and opportunity management as the ongoing task of identifying, analyzing, and evaluating the spectrum of potential and actual developments within the company and in the company's environment. In this context, flatexDEGIRO has implemented a wide range of risk-mitigating measures. In this context, as part of the double materiality assessment (DMA), material sustainability-related risks and opportunities linked to our own operations, our products and services, and our business relationships were identified. The materiality assessment / materiality judgement and reporting of these risks are conducted, in accordance with the ESRS, on a gross basis, i.e., without offsetting against risk-mitigation measures; the existing

control and mitigation measures are explained in addition. The risks identified as material and their potential impacts on non-financial matters are disclosed in the respective chapters of this report. For further information, please refer to the section “Outlook and Opportunities Report” in the group management report for the 2025 fiscal year.

The ESRS are divided into a total of twelve standards: two cross-cutting standards and ten topic-specific standards, on which reporting is required depending on their materiality. The cross-cutting standards define the fundamental principles and guidelines for reporting and establish general disclosure requirements regarding strategy, management processes, and governance structures related to sustainability. Their application is mandatory, and they are addressed in the introductory section “General Information” of this Group sustainability statement. Based on our materiality assessment, we also report on the topics of climate change (E1), biodiversity and ecosystems (E4), our workforce (S1), consumers and end-users (S4), and aspects of corporate governance (G1). In addition, this report contains the required disclosures in accordance with the EU Taxonomy Regulation 2020/852.

### Upstream and downstream value chain

The flatexDEGIRO Group’s non-financial statement takes into account, in accordance with ESRS requirements, material impacts, risks and opportunities along the entire upstream and downstream value chain. In the upstream value chain, this includes, in particular, IT, technology, and infrastructure-related aspects, i.e., the procurement of hardware and software, licenses, as well as cloud and data center services, telecommunications, IT services, and external development and consulting services, including information security issues. In addition, energy- and building-related aspects are included, such as electricity and heat supply as well as facility management and real estate services at the locations. Also relevant are service providers that, to the extent required by the business model, provide processes and services, such as certain IT or support services. Market infrastructure and data are also considered as key upstream service providers, in particular stock exchanges and trading venues, clearing, settlement, and custodians / depositories, as well as providers of market and reference data. In the downstream value chain, the focus is primarily on customers in the retail segment who use brokerage and banking services such as securities

trading, custody, and payments; Consequently, impacts on customer protection / investor protection, transparency, and financial inclusion are also examined. Additionally, customer service and complaints management processes are included, such as the provision of information and the handling of complaints and claims in the context of customer service. Marketing and communication, that is, the marketing of products and services as well as communication measures relevant to consumer and end-user interests, are also part of the analysis. Finally, regulatory and compliance interfaces are taken into account, particularly interaction with supervisory authorities and the implementation of regulatory requirements as an essential component of the downstream impact chain in the financial services sector.

### Omissions

No information has been omitted that relates to intellectual property, protected know-how, or results from innovation processes. This applies to this non-financial statement as well as to information regarding expected developments and matters that are the subject of ongoing negotiations.

## BP-2 – Disclosures in relation to specific circumstances

### Defined time horizons

When assessing material impacts, risks, and opportunities, flatexDEGIRO generally applies the time frames defined in the ESRS (short-, medium-, and long-term). In the context of climate-related resilience analysis and transition planning, specific planning and consideration periods are used in accordance with the respective ESRS requirements (e.g., quantification of measures over a multi-year planning horizon).

### Estimates regarding the value chain and sources of estimates and estimation uncertainty

Where estimates are necessary, flatexDEGIRO relies on recognized data sources and established methods, in particular emission-factor-based methods as well as expenditure- and activity-based approximations. Generally accepted emission factors, such as those from regulatory or established databases, as well as relevant methodological standards, are applied. The specific derivation, scope, and methodology of the estimates used are explained in the respective disclosures for ESRS E1, in particular E1-6.

The accuracy of estimated metrics depends significantly on the proportion of available primary data as well as on the granularity and timeliness of the underlying emission factors. flatexDEGIRO therefore prioritizes the use of primary data; where approximations are necessary, conservative assumptions are made and plausibility checks are performed. Methodological uncertainties, particularly in connection with estimated Scope 3 emissions, are presented transparently in the topic-specific disclosures.

The Group is continuously working to improve data coverage and quality in the sustainability statement. This includes, in particular, expanding systematic data collection using an emissions data collection tool, gradually increasing the proportion of primary data, especially in Scope 3 categories, and regularly updating processes and data sources considering regulatory and methodological developments.

Individual quantitative metrics, particularly those based on secondary data, emission factors, or spend-based

#### Application of the transitional provisions (“Quick Fix”) for ESRS S4 (Consumers and end-users)

In the 2025 fiscal year, flatexDEGIRO made use of the option provided by Delegated Act C(2025)4812, final, to temporarily suspend the detailed disclosure requirements of the topic-specific standard ESRS S4 (Consumers and end-users). Notwithstanding this, the topic “Consumers and End Users” was identified as material within the scope of the DMA.

ESRS	Topic	Sub-topics	Sub-sub-topics	Impact	Type
ESRS S4	Consumers and end users	Information-related impact for consumers and/or end users	Privacy	Data protection incidents lead to violations of the personal rights of consumers and end users (e.g. through cyber-attacks or improper handling of data)	Potentially negative
			Access to (quality) information	Offering ESG products	Actually positive
ESRS S4	Consumers and end users	Personal safety of consumers and/or end users	Security of a person	Promotion of the financial stability of end users	Potentially positive

#### Key aspects and consideration in the business model

The aspects of data protection, access to high-quality information, including ESG products, and personal security

approximations, are inherently subject to increased measurement uncertainty. The extent and causes of these uncertainties, as well as the underlying assumptions, estimates, and expert judgments, are disclosed in the relevant disclosures for ESRS E1, particularly E1-6.

#### Disclosures based on other legal provisions or generally accepted guidelines on sustainability reporting

The disclosures pursuant to Article 8 of the EU Taxonomy Regulation are presented in the statement in conjunction with the environmental disclosures.

#### Inclusion of information by reference

References to information outside the annual report (e.g., the flatexDEGIRO SE website or other publications) are provided solely for further information and are not part of the non-financial report.

in the sense of promoting financial stability were identified as key. flatexDEGIRO’s digital business model is based on the processing of sensitive customer and transaction data,

the highly available provision of trading platforms, and transparent information about financial products. Data protection and IT security are central prerequisites for the platform's trust and integrity. At the same time, the company contributes to financial inclusion and stability of private investors through transparently structured cost models, broad product access, and information offerings.

### Goals and Progress

In the area of data protection and cybersecurity, flatexDEGIRO aims to ensure the integrity, availability, and confidentiality of all systems and data. This includes, in particular, the complete defense against identified cyberattacks and the prevention of data breaches. In the 2025 reporting year, all relevant cyberattacks were successfully repelled; there were no confirmed data breaches resulting from external attacks. In addition, the requirements of Regulation (EU) 2022/2554 (DORA) were implemented on time.

In the area of financial stability, the focus is on the continuous development of the product portfolio, strengthening platform stability, and expanding savings and investment solutions. In the reporting year, among other things, the crypto trading offering was rolled out in additional markets and securities lending was introduced in selected countries.

There is no reference to biodiversity-related objectives within the framework of ESRS S4.

### Policies

The protection of consumer and end-user interests is anchored in a comprehensive data protection and information security framework. This includes, among other things, group-wide data protection policies, IT access management requirements, and documented emergency and security procedures. Responsibilities are clearly assigned within the organization (including the Information Security Officer, IT Security Officer, and Data Protection Officer). The data centres are ISO 27001 certified, and a 24/7 reporting mechanism for data protection and security incidents has been implemented.

Financial stability is promoted through strategic product development, transparent cost information, and structured financial education offerings. There is no separate policy for

this; management takes place within the framework of the business and product strategy.

### Measures and Results

To ensure data security, technical and organizational measures were continued and further developed during the reporting year. These include multi-layered security architectures, DDoS and email protection, redundant system infrastructures, regular emergency tests, and established outsourcing and IT risk management. The effectiveness of these measures was demonstrated in the reporting year by the complete defense against external attacks and compliance with defined system availability targets.

To promote financial stability, product offerings were expanded, platform functions were optimized, and feedback mechanisms for customer satisfaction were further developed. The Net Promoter Score for DEGIRO increased significantly as of December 31, 2025, while the score for flatex remained virtually unchanged from the previous year. The number of female customers continued to rise in the past fiscal year and now accounts for approximately 20.1% of the total customer base.

No quantitative metrics were available for ESG product usage in the reporting year.

### Relevant Key Figures

<b>data protection</b>	<b>2025</b>	<b>2024</b>
Cyberattack defense rate	100%	100%
Data breaches resulting from cyberattacks	0	0
ISO 27001-certified data centres	Yes	Yes

<b>Promoting financial stability</b>	<b>2025</b>	<b>2024</b>
flatex Net Promoter Score	59	60
Net Promoter Score DEGIRO	56	47
Percentage of female customers	20.1%	19.1%

## GOV-1 – The role of the administrative, management and supervisory bodies

### Management and supervisory structure, legal form, and composition of the bodies

flatexDEGIRO SE has a dualistic corporate governance system with the Management Board as the executive body and the Supervisory Board as the supervisory body. In December 2025, the change of legal form to an SE and the change of legal form of the banking subsidiary to flatexDEGIRO Bank SE were entered in the commercial register.

As of the reporting date of December 31, 2025, the Management Board consisted of three executive members. During the reporting year, the number of Management Board members temporarily decreased from four to three due to a personnel change. As of the reporting date, the Supervisory Board consisted of five non-executive members. The Management Board comprised one woman and two men, corresponding to a female representation of 33%. The Supervisory Board consisted of two women and three men, corresponding to a female representation of 40%. Workers' representatives or other employees in executive positions were not represented on either the Management Board or the Supervisory Board during the reporting period. The Supervisory Board is elected by the Annual General Meeting.

The Management Board was responsible at the management level and the Supervisory Board at the supervisory level for monitoring material impacts, risks and opportunities. As of the reporting date of December 31, 2025, the Supervisory Board consisted of Hans-Hermann Lotter as Chairman, Stefan Müller as Vice Chairman, Bernd Förtsch, Martina Pfeifer, and Sarna Röser. The Management Board consisted of Oliver Behrens, Dr. Benon Janos, and Christiane Strubel. During the reporting year, Stephan Simmang was also a member of the Management Board until May 31, 2025.

### Independence of Supervisory Board Members and Handling of Conflicts of Interest

flatexDEGIRO assesses the independence of Supervisory Board members based on recognized standards of corporate governance, in particular the recommendations of

the German Corporate Governance Code. The declaration of compliance is published on the company's website. The shareholder structure is taken into account in the independence assessment. As of the reporting date of December 31, 2025, one Supervisory Board member held or controlled a significant voting rights stake of 18.35%.

Potential conflicts of interest must be disclosed immediately in accordance with the governance recommendations. Where necessary, they are discussed and addressed within the relevant committee.

### Responsibilities of the governing bodies for corporate policy and monitoring of material impacts, risks and opportunities

The Management Board bears overall responsibility for corporate governance, strategy, and compliance with regulatory requirements. This includes responsibility for the sustainability strategy and for proper sustainability reporting. The Management Board establishes the binding framework for corporate policy in accordance with ESRS G1. This includes, in particular, business ethics and corporate culture, anti-corruption measures, whistleblower systems, supplier relationships, and political influence. To this end, the Management Board adopts Group-wide regulations, including a code of conduct, guidelines on corruption prevention and anti-money laundering prevention, regulations governing the whistleblower system, and data protection guidelines, and ensures their operational implementation through the compliance management system.

The Supervisory Board oversees the management of the Management Board. This includes monitoring the effectiveness of the internal control and risk management system as well as overseeing the non-financial reporting process. The Supervisory Board approves the non-financial report. To efficiently perform its duties, the Supervisory Board has established committees. The Joint Risk and Audit Committee oversees, in particular, financial reporting, including sustainability reporting, the internal control system, risk, audit, and compliance management, as well as the audit of the financial statements. Since June 2025, the chair of the Joint Risk and Audit Committee has been the Chair of the Supervisory Board.

The management function rests with the Management Board as a collegial body. The management role is not fully delegated to a single position or committee. Monitoring and implementation are supported by a central ESG staff unit and a Sustainability Officer, as well as by the relevant control and risk functions. These include, in particular, risk management, compliance, AML, and internal audit.

### **Information Provision, Reporting Channels, and Integration into Governance, Risk, and Control Structures**

Information on sustainability matters is provided to the Management Board and Supervisory Board via the established internal reporting system. This includes monthly reporting and risk reporting, as well as the preparation, review, and approval of the non-financial report. Significant control weaknesses, action plans, and implementation progress within the accounting-related internal control system are reported to the Management Board. This information is additionally reported to the Audit Committee of the Supervisory Board. Findings regarding serious compliance and money laundering issues are reported to the Management Board and subsequently forwarded to the Risk and Audit Committee as well as to the Supervisory Board.

The management of material impacts, risks, and opportunities is integrated into the existing governance, risk, and control structures. This includes risk and compliance management, the internal control system with preventive and detective controls, and the involvement of internal audit. The Supervisory Board monitors the effectiveness of the relevant management and control systems, in particular through the Joint Risk and Audit Committee.

### **Monitoring of Objectives, Progress, and Non-Financial Performance Indicators**

The Management Board and Supervisory Board monitor the setting of objectives and progress within the framework of the Group-wide management and reporting system. Key non-financial performance indicators include, in particular, employee satisfaction (as an indicator of key IROs in the area of "own workforce," e.g., retention, employer attractiveness, health, and productivity) as well as the performance of external ESG ratings (as a " " indicator summarizing material IROs in the areas of climate change,

own workforce, consumers and end users, and corporate governance) are tracked and reported on a regular basis. However, these metrics will not be used for management purposes in the 2025 reporting year; they primarily serve to monitor the effectiveness of measures and to identify the need for action at an early stage.

### **Competency Profile, Expertise, and Qualifications of the Governing Bodies**

The composition of the Management Board and Supervisory Board follows a competency profile that encompasses professional expertise in banking and capital markets, regulation and risk management, as well as sustainability and governance. The required expertise is strengthened through continuing education programs. In addition to accounting and financial statement auditing, these cover topics related to the internal control system, risk management, and cybersecurity. They also address requirements for sustainability reporting, including the CSRD and EU taxonomy.

Sustainability-related expertise is focused on the key topics identified as reportable under the DMA. In this context, the non-financial report addresses, in particular, climate change, biodiversity and ecosystems, the company's own workforce, consumers and end-users, as well as aspects of corporate governance. This expertise is supplemented by a systematic training program as well as the ongoing integration of relevant control and staff functions into reporting to the governing bodies. These include, in particular, compliance, anti-money laundering prevention, risk management, internal audit, the ESG unit, and data protection. The governing bodies receive regular reports as well as ad hoc information on material risks, developments, and incidents.

### **GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies**

flatexDEGIRO ensures that the Management Board and the Supervisory Board, including relevant committees, are informed about material sustainability matters and that these were addressed in the work of the governing bodies during the reporting period. The Management Board bears overall responsibility for corporate governance that is

conducted with integrity, in compliance with the law, and in a sustainable manner; it enforces the binding framework of corporate policy through Group-wide guidelines and ensures operational implementation via the compliance management system. To provide technical support for reporting and decision-making, there is a group-wide ESG governance structure with a central ESG staff unit and a Sustainability Officer, who work closely with Compliance, risk management, internal audit, data protection, and the operational units. The governing bodies receive regular reports as well as ad hoc information on significant developments, incidents, and governance risks, particularly in the context of corruption and money laundering risks, conflicts of interest, data protection breaches, and reports from the whistleblower system.

The Supervisory Board is informed regularly, promptly, and comprehensively about issues relevant to the Group through written and oral reports from the Management Board. This includes, in particular, business policy and strategy, corporate planning, business performance, the risk situation and risk management, as well as significant matters relating to legal affairs, human resources, internal audit, and compliance, with the Supervisory Board being directly and promptly involved in decisions of significant importance for business development. The Joint Risk and Audit Committee supports the Supervisory Board in monitoring financial reporting, including sustainability reporting and its implementation, as well as in monitoring the effectiveness of the internal control system, the risk management system, the internal audit system, and the compliance management system. In risk management, ESG risks are not treated as a separate risk category at, but rather as ESG risk factors that impact established risk categories, and their relevance is assessed as part of the risk inventory through a materiality assessment, particularly regarding factors in non-financial risks, operational risks, and business risks. In addition, the Supervisory Board, Management Board, and management are continuously informed about the development of key performance indicators through monthly risk reporting. Among other things, the performance of our ESG ratings is reported as a non-financial performance indicator in the monthly management report.

The sustainability matters addressed by the Management Board and Supervisory Board during the reporting period

are derived from the results of the DMA and are considered when determining the scope of the report and prioritizing management and monitoring measures. The material topics were identified using defined thresholds, which were reviewed by representative company representatives and finally approved by the Management Board. Climate change (E1), our own workforce (S1), consumers and end users (S4), and corporate governance (G1) were identified as material topics. Accordingly, the governing bodies address, in particular, climate-related impacts, risks and opportunities; material human resources topics, including relevant performance indicators; impacts and risks for consumers and end users, such as data protection and IT security; and governance aspects of corporate policy, including anti-corruption and anti-money laundering prevention, whistleblowing, and the effectiveness of the compliance management system. The Supervisory Board reviews and approves the non-financial report. There are defined processes for handling reports and incidents, the results of which are documented and used as a basis for measures, with Compliance, anti-money laundering prevention, and internal audit operating independently and reporting directly to the Management Board and indirectly to the Supervisory Board.

### GOV-3 – Integration of sustainability-related performance in incentive schemes

In the 2025 fiscal year, the sustainability-related performance of the members of the administrative, management and supervisory bodies at flatexDEGIRO is not considered as a separate component in the incentive and compensation systems. In the 2025 fiscal year, members of the Supervisory Board will receive only fixed compensation. The compensation system for members of the Management Board comprises fixed, variable, and equity-based compensation components. The structure of the compensation system is explained in the Company's Compensation Report, which is published on the Company's website.

In the 2025 fiscal year, climate-related considerations are not considered as an explicit remuneration component in the compensation of members of the Management Board or the Supervisory Board.

## GOV-4 – Statement on due diligence

flatexDEGIRO has established a Group-wide due diligence process regarding sustainability matters, which is designed to systematically identify, assess, and prevent, mitigate, and, where necessary, remedy actual and potential negative impacts on the environment and society. The process is embedded in the governance structure and central management systems. The Management Board defines the binding framework of corporate policy and adopts group-wide regulations such as the code of conduct and other governance regulations, including anti-corruption and anti-money laundering policies, the Whistleblower Policy, and data protection guidelines.

Operational implementation is managed through the compliance management system. In addition, there is a Group-wide ESG governance structure with a central ESG staff unit and a Sustainability Officer working in close collaboration with Compliance, risk management, internal audit, and the operating units. The Supervisory Board monitors the adequacy and effectiveness of corporate policy and receives regular reports on compliance, anti-money laundering prevention, internal audit, and significant incidents.

The identification and assessment of impacts, risks and opportunities is based on a materiality assessment following the concept of double materiality and is supplemented by risk and control processes. Based on these assessments, preventive, control, and remedial measures are defined and integrated into relevant processes. These include, among other things, the further development of internal regulations, the implementation of procedural controls, and target-group-specific training measures. Group-wide reporting and grievance channels are in place for receiving and processing reports and complaints, including a whistleblower system that enables internal and external reporting and allows for anonymous reports. Reports are documented and investigated in accordance with standardized procedural rules. Investigations are conducted by qualified compliance functions in collaboration with other departments such as internal audit, Legal, or HR, depending on the nature and severity of the matter. Results are documented in a manner that ensures traceability and, in the case of significant matters, reported to the Management Board and, where applicable, to Supervisory Board committees. Remedial

measures are determined and implemented based on the results. The effectiveness of the due diligence process is continuously monitored, including through training levels, controls, audit findings, and analyses of the nature and handling of reports received. Findings from monitoring and case handling are incorporated into the continuous improvement of processes, controls, and training concepts.

## GOV-5 – Risk management and internal controls over sustainability reporting

The governance, risk, and control processes for sustainability reporting are embedded in the Group-wide governance, risk, and control system. The Management Board bears overall responsibility for the proper preparation of sustainability information and ensures that appropriate processes, roles, systems, and control activities are defined, documented, implemented, and continuously developed for this purpose. The Supervisory Board oversees the performance of these duties; in doing so, the Audit Committee (GRUPA) focuses in particular on monitoring financial reporting and the financial reporting process, including sustainability reporting and its implementation, as well as monitoring the effectiveness of the internal control system, the risk management system, the internal audit system, and the compliance management system.

Risk management is based on a regular risk inventory as a central process for identifying, assessing, and managing risks. Within this framework, a Business Environment Scan is also conducted; in addition, a detailed ESG risk driver analysis is performed to clarify the interrelationships with traditional risk types. ESG risks are predominantly assigned to the categories of non-financial risk (operational) and business risk. The risk inventory simultaneously forms the risk universe for ICAAP and ILAAP; the Management Board and Supervisory Board are regularly informed via risk reporting. For risk management, a normative and an economic perspective are employed in accordance with BaFin's RTF guidelines, including the use of stress tests (including ESG stress tests) and a limit system for deriving and implementing control measures.

The prioritization of risks in the context of sustainability reporting is risk-oriented and is derived from the interplay of

double materiality, risk inventory, and the internal control system. The starting point is the risk and process areas identified and assessed as part of the regular risk inventory, as well as the sustainability topics identified as subject to reporting (climate change (E1), own workforce (S1), consumers and end users (S4), and corporate governance (G1)).

For the reporting-relevant data points and process steps derived from this, an assessment of the risk of misreporting is conducted annually (and on an ad hoc basis, e.g., in the event of significant process/system or regulatory changes).<sup>1</sup> prioritization takes into account, in particular, (i) the potential effect of misreporting on the completeness, reliability, and compliant coverage of material disclosures, as well as (ii) the probability of occurrence, influenced by factors such as data availability, the degree of estimates/discretionary judgments, the complexity of the methodology, interface and manual processing steps, and the maturity of controls. Both dimensions are evaluated using harmonized assessment criteria and consolidated into a risk matrix; the aggregation logic is based on the methodology established in risk management (including the combination of assessment scores).

The resulting risk class determines the prioritization of control focus areas (e.g., design of preventive and detective controls, intensity of plausibility checks/reviews, sample size) as well as the priority of action plans and process improvements.

Based on the prioritization, the following risks in particular were identified as material or high priority; the mitigation strategies are integrated into the reporting, risk, and control processes:

- Data availability and estimation uncertainties (particularly in the environmental context/GHG accounting, especially Scope 3): Significant portions of Scope 3 emissions are based on limited primary data and require estimates and assumptions, which increases the risk of error and the volatility of results. Mitigation strategy: Implementation of an emissions data collection tool for the systematic determination of Scope 1, Scope 2, and Scope 3 emissions in accordance with the GHG Protocol; standardization of data collection and methodological documentation; and
- risk-oriented plausibility checks and review controls; gradual improvement of data quality (particularly through a higher proportion of primary data, where available).
- Methodological risks in climate-related analyses (e.g., scenario/stress analyses): Climate-economic scenarios and location-specific physical analyses are subject to inherent uncertainties (including the probability of extreme events and long-term feedback loops), which can affect traceability and robustness of results. Mitigation strategy: Use of documented methodologies, technical validation and review cycles, as well as the integration of external models to derive key assumptions; linkage with existing stress testing approaches and consistent derivation/verifiability of assumptions.
- Completeness and consistency of data collection and consolidation across Group companies (definitions, scope, interfaces): Divergent data sources, varying levels of process maturity, or definitions that are not fully harmonized can lead to inconsistencies (e.g., scope of consolidation, KPI definitions). Mitigation strategy: Process harmonization and an internal certification process to ensure the process quality of operational units and interfaces; central coordination and risk-oriented definition of controls throughout the reporting process.
- Susceptibility to errors in manual processing steps and data interfaces in the reporting process: Manual data extractions, aggregations, and transfers increase the risk of input/mapping errors or versioning issues. Mitigation strategy: A combination of preventive and detective controls (including the four-eyes principle, plausibility/reconciliation checks, standardized templates, and documentation requirements) as well as system support to reduce manual steps.
- Regulatory interpretation and change risks (CSRD/ESRS) affecting reporting scope and data point definitions: New or evolving regulatory requirements may necessitate short-term adjustments to data management, methodology, and presentation. Mitigation strategy: ongoing monitoring of key regulatory requirements and systematic tracking of relevant regulatory developments within the Non-Financial Risk Control Framework; integration of ESG, risk, compliance, and audit functions

To ensure the reliability, traceability, and auditability of reporting, a Group-wide internal control system is in place, structured in accordance with the internationally recognized COSO Internal Control – Integrated Framework (2013) as referenced.

In the reporting process, internal controls are defined in a risk-oriented manner and designed as both preventive and detective controls; process harmonization and an internal certification process serve to ensure the process quality of operational units and the interfaces with Group companies. The effectiveness of the accounting-related ICS is monitored across the Group: At the beginning of the year, relevant items and process steps are identified based on risk considerations and are regularly tested for effectiveness on a sample basis throughout the year. The random-sample-based control tests cover both the design effectiveness and the operating effectiveness of the controls and are coordinated and validated by an independent unit (Group Internal Controls). Identified control weaknesses are analyzed and evaluated, particularly with regard to their impact; significant control weaknesses, action plans for addressing them, and progress are reported to the Management Board and the GRUPA. Internal audit is closely involved at all stages of this process.

As part of aligning the 2025 non-financial report with the requirements of the CSRD/ESRS, ESG aspects were systematically integrated into business strategy, risk management, and the internal control system; the double materiality framework serves as the basis for prioritizing report-relevant topics, data processes, and control focus areas.

To support data collection and continuously improve data quality, an emissions data collection tool was implemented in the environmental context to systematically determine Scope 1, Scope 2, and Scope 3 emissions in accordance with the GHG Protocol; In addition, climate-related risks (particularly transitional and physical risks) as well as relevant regulatory requirements are systematically recorded via a Non-Financial Risk Control Framework.

To the extent required by law, an external audit of sustainability information is planned in accordance with the applicable requirements. For the fiscal year 2025, there is no legal obligation to conduct an external audit of the separate non-financial group report at the time of reporting due to the absence of national implementing regulations in Germany.

#### Overview of the key steps to fulfill due diligence:

Key elements of due diligence	Paragraphs in the sustainability statement
a) Integration of due diligence into governance, strategy and business model	GOV-2, GOV-3, SBM-3
b) Involvement of affected stakeholders in all important steps of due diligence	GOV-2, SBM-2, IRO-1
c) Identification and assessment of negative impacts	IRO-1, SBM-3
d) Measures to address these negative impacts	E1-3
e) Monitoring the effectiveness of these efforts and communication	E1-4, E1-5, E1-6, E1-7, E1-8, S1-5, S1-6, S1-9, S1-14, S1-16

### SBM-1 – Strategy, business model and value chain

flatexDEGIRO is a European retail online broker and financial technology provider. In the field of financial services and financial technology, the Group offers online brokerage services as well as banking- and securities-

related IT solutions with high standards for security, performance, and quality. The focus of the business is on online brokerage. The parent company, flatexDEGIRO SE, develops, provides, and operates future-proof IT solutions for the settlement of securities transactions and payments. This includes, in particular, the operation of the IT infrastructure for retail customers, through which customer

transactions are processed in 16 European countries. In December 2025, the change of legal form of flatexDEGIRO and its banking subsidiary to a Societas Europaea took effect, underscoring the Group's pan-European orientation.

The Group's value creation stems primarily from the digitally scalable provision of brokerage services to retail clients, as well as from banking services related to custody, payments, and treasury-based revenue streams. As of December 31, 2025, the customer base comprised 3.5 million customer accounts. In the 2025 reporting year, 75.4 million transactions were executed. The Group's revenue amounted to 559.8 million euros in the 2025 fiscal year.

The Group is managed on a segmented basis in accordance with IFRS 8 through the flatex and DEGIRO segments. The flatex segment comprises the online brokerage activities of the flatex and ViTrade brands, with a geographical focus on Germany and Austria, as well as the portion of the Credit and treasury business not allocated to DEGIRO. The DEGIRO segment comprises the online brokerage activities of the DEGIRO brand in several European countries. IT services within the Group are allocated to the segments in the reporting.

The value chain includes, in particular, the development and operation of digital platforms and interfaces, customer onboarding and account management, connectivity to trading venues and execution routes / execution venues, order reception and order processing, trade execution, post-trade processing including clearing and settlement, the custody of client funds and securities, the operation and monitoring of IT and security processes, outsourcing management, and interaction with clients, business partners, regulators, investors, and other stakeholders. To this end, the Group also utilizes external service providers and outsourcing arrangements, which are recorded, managed, and factored into risk assessments as part of a third-party risk management framework, including contractual service level agreements for significant outsourcing arrangements.

The sustainability strategy is linked to the business model and addresses the key control areas essential for a regulated, technology-driven brokerage firm. These include the integration of ESG aspects into strategy and management systems, the responsible handling of

customer and business partner data, the development of employees and corporate culture, and the reduction of greenhouse gas emissions from the Group's own operations and along the value chain. In upstream and downstream value creation, the Group anchors sustainability expectations for suppliers and IT service providers through, among other things, the Business Partner Code of Conduct. Sustainability criteria are incorporated into procurement decisions, and requirements for products, services, and suppliers are regularly evaluated. Among the most significant challenges in the coming years, in addition to the operational implementation of the identified sustainability priorities, is the increasing, and in some cases politically driven, uncertainty in the regulatory environment. Delays, transitional provisions, or substantive adjustments in the European and national legislative and supervisory processes, such as in the context of the CSRD/ESRS and ongoing initiatives to reduce complexity (Omnibus), can alter timelines, levels of detail, and the interpretation of requirements, thereby increasing the need for adaptability, resilient data processes, and robust governance structures. flatexDEGIRO is addressing these challenges through planned and ongoing projects. These include the expansion of a group-wide ESG and reporting framework (including clear roles, processes, and internal controls), the further development of supplier and IT service provider management (including through risk-based assessments, contractual standards, and regular reassessments based on the Business Partner Code of Conduct), and the strengthening of data and information security processes. In the environmental sphere, there are also plans to develop and adopt a formally integrated transition plan for climate change mitigation over the next two years. At the same time, methods, data processes, and modeling approaches are being further developed to meet future requirements for robust climate-related quantifications and disclosures.

#### Selected quantitative data from the 2025 Annual Report

	2025	2024
Group revenue in millions of EUR	559.8	480.0
Consolidated net income in millions of EUR	161.1	111.5

	2025	2024
Customer accounts as of December 31 in millions	3.5	3.1
Transactions executed in millions	75.4	63.1

## SBM-2 – Interests and views of stakeholders

flatexDEGIRO maintains an ongoing dialogue with relevant stakeholders to systematically gather expectations, positions, and developments and incorporate them into corporate governance. The stakeholder groups identified in the annual report include, in particular, customers, employees, business partners (including suppliers), shareholders, associations and authorities, as well as policymakers and academia. The stakeholder dialogue serves to gather suggestions, understand positions, identify trends early on, and develop partnerships. At the same time, the dialogue is used to discuss current challenges and outline which framework conditions are relevant to the Group's business development.

Stakeholder perspectives are addressed through appropriate formats tailored to the stakeholder group, occasion, and information needs. These include internal information and exchange formats for employees and managers, measures to further develop knowledge and skills, and activities to promote financial literacy. Dialogue with capital market participants takes place through established investor relations processes. The Supervisory Board supports appropriate communication with investors within the framework of legal and regulatory requirements. With respect to regulators and supervisory authorities, expected information and reporting obligations are fulfilled, and material issues are addressed in the relevant committees.

The results of the stakeholder dialogue are incorporated into the materiality assessment as well as into the further development of the business strategy and action planning. Changes in the expectations of relevant stakeholder groups are identified through stakeholder communication and dialogue formats and may trigger adjustments to guidelines, systems, and measures.

Within the framework of the DMA, the perspectives of relevant stakeholders are additionally gathered in a targeted manner. This includes, among other things, structured stakeholder formats such as interviews with selected capital market participants. The insights gained from this are used to identify sustainability-related risks and opportunities at an early stage and to incorporate them into the subsequent internal materiality assessment. Detailed discussion content is not published for confidentiality reasons unless consent for publication has been obtained; the key messages are aggregated and incorporated into the management and further development of sustainability management.

If the dialogue with stakeholders indicates a need for action at the strategic or business model level, this is addressed within the framework of the strategy and planning process as well as the planning of measures and resources. In doing so, an assessment is made of whether and to what extent the expectations and viewpoints of relevant stakeholders require adjustments to strategic priorities, the design of key products and services, and the underlying processes and controls. Potential changes are reviewed with consideration of their impact on stakeholder relationships (e.g., transparency, service, and communication requirements) and, following a decision, are incorporated into the multi-year planning and action management. flatexDEGIRO systematically integrates environmental, social, and governance aspects into its business strategy, risk management, and internal control system, and aligns its sustainability management with growing regulatory requirements. As a further step in this development, the company plans to develop and adopt a formally integrated transition plan for climate change mitigation within the next two years. These further developments aim to strengthen the resilience of the business model, further increase transparency and reliability toward relevant stakeholder groups, and thereby solidify the foundation for stable business relationships and trust; at the same time, this may lead to further increased expectations regarding the depth and regularity of the dialogue.

The key results from the stakeholder dialogue, as well as the material sustainability-related impacts, risks and opportunities derived therefrom, are made available to the Management Board and Supervisory Board as part of the established reporting framework. This also includes the

views and expectations of affected stakeholders regarding sustainability-related impacts, which were gathered in the dialogue formats and evaluated in aggregated form. Where necessary, these are discussed in the relevant committees and incorporated into the prioritization and monitoring of measures. The ESG unit consolidates key findings from the various dialogue formats and prepares them for consideration by the Management Board in collaboration with relevant functions (including HR, Investor Relations, Compliance, and risk management). The Supervisory

Board is informed about key stakeholder issues, their implications, and the progress of relevant measures through regular reporting by the Management Board as well as in the relevant committees; in the event of significant developments, ad hoc briefings are provided.

In the reporting year, the stakeholder dialogue did not result in any fundamental changes to the Group's strategy or business model, nor in any adjustments to policies, processes, or priority measures.

### SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Based on the DMA, the material sustainability topics for flatexDEGIRO were identified in accordance with the ESRS. The topics E1 – Climate change, S1 – Labor, S4 – Consumers and end-users, and G1 – Business conduct was classified as material.

Topic	Impact, risks, opportunities	Description	Value chain	Time horizon
<b>E1 – Environment</b>				
E1 - Climate protection	Potentially negative	Climate-related impacts on employees (e.g. increasing health risks)	Own business activities	Medium to long term
E1 - Climate protection	Actually negative	GHG emissions from business travel	Own business activities	Short, medium and long term
E1 - Energy	Actually negative	High energy consumption due to server farms/data centres (e.g. through operation and cooling)	Own business activities, upstream and downstream value chain	Short, medium and long term
E1 – Climate protection	Risk	Transitional risks – political framework conditions	Own business activities, upstream and downstream value chain	Short term
E1 – Climate protection	Risk	Transitional risks – change in customer demand	Downstream value chain	Medium term

Topic	Impact, risks, opportunities	Description	Value chain	Time horizon
E1 – Energy	Risk	Energy consumption of data centres	Own business activities	Medium term
E1 - Energy	Risk	Effects of global warming on data centres	Upstream value chain	Long term
<b>S1 – Own workforce</b>				
S1 - Working conditions	Actually positive	Contribution to the well-being of our own employees through employment	Own business activities	Short, medium and long term
S1 - Working conditions	Actually positive	Provision of (relatively) secure jobs	Own business activities	Short, medium and long term
S1 - Working conditions	Actually positive	Payment of fair remuneration	Own business activity	Short, medium and long term
S1 - Working conditions	Potentially negative	Increased workload due to high number of overtime hours	Own business activities	Short, medium and long term
S1 - Working conditions	Potentially negative	Overworked staff due to inadequate work-life balance	Own business activities	Short, medium and long term
S1 - Working conditions	Actually negative	Lack of exercise due to office work among the company's employees	Own business activities	Short, medium and long term
S1 - Working conditions	Actually positive	Promotion of the company's workforce through further training	Own business activities	Short, medium and long term
S1 - Secure employment	Opportunity	Work-life balance increases employee satisfaction and resilience	Own business activities	in the medium term

Topic	Impact, risks, opportunities	Description	Value chain	Time horizon
S1 - Social dialogue	Opportunity	Social dialogue promotes identification and thus employee loyalty and motivation.	Own business activities	Medium term
<b>S4 - Consumers and end users</b>				
S4 - Consumers and end users	Potentially negative	Data protection incidents lead to violations of the personal rights of consumers and end users (e.g. through cyber-attacks or improper handling of data)	Downstream value chain	Short, medium and long term
S4 – Consumers and end users	Actually positive	Offering ESG products	Downstream value chain	Medium to long term
S4 – Consumers and end users	Potentially positive	Promotion of financial stability for end users	Downstream value chain	long term
S4 - Access to products and services	Risk	Damage to customer trust due to misleading content and faulty implementation	Downstream value chain	Medium term
S4 - Health and safety	Risk	Inadequately tested updates and faulty software cause technical problems and security risks.	Downstream value chain	short term
S4 – Access to (quality) information	Risk	The use of artificial intelligence can lead to misinformation	Downstream value chain	long term
S4 - Access to (quality) information	Opportunity	Improvement of information and education offerings in the area of sustainable products	Own business activities	Medium term

Topic	Impact, risks, opportunities	Description	Value chain	Time horizon
S4 - Access to products and services	Opportunity	Positive effects of the service offering on financial education and demographic change	Own business activities	Medium term
<b>G1 - Governance</b>				
G1 - Corporate governance	Actually positive	Identity-building and appreciative work for our own employees through a clearly communicated and lived corporate culture	Own business activities	Short, medium and long term
G1 - Corporate governance	Actually positive	Encouraging individuals to communicate and share information about misconduct by providing comprehensive protection for whistleblowers	Own business activities, upstream and downstream value chain	Short, medium and long term
G1 - Corporate governance	Potentially negative	Inadequate protection for whistleblowers	Own business activities, upstream and downstream value chain	Short, medium and long term
G1 – Corporate governance	Potentially negative	Loss of wealth for private investors due to corruption scandals and resulting losses in value (management failure)	Downstream value chain	short, medium and long term
G1 - Corporate culture	Risk	Potential risk due to non-compliance with environmental regulatory changes	Own business activities, upstream and downstream value chain	Short term

Topic	Impact, risks, opportunities	Description	Value chain	Time horizon
G1 – Corporate culture	Risk	Potential legal consequences in the event of digital infrastructure failure	Own business activities	Short term
G1 - Corporate culture	Risk	Inadequate sustainable incentive system	Own business activities	Short term
G1 - Corporate culture	Opportunity	A good corporate culture contributes to the attractiveness of the company	Own business activities	Long term
G1 - Corporate culture	Opportunity	Increased efficiency in resource-intensive processes through the use of artificial intelligence	Own business activities	long term
G1 - Corporate culture	Opportunity	Improvement of risk management through higher-quality climate data	Own business activities	Medium term

## Legend

Type: Potential/actual, positive/negative → Impact; Risk or Opportunity

US VC: Upstream Value Chain

OO: Own Operations; Own operations

DS VC: Downstream value chain

<1Y: Short-term time horizon; up to one year

1-5Y: Medium-term time horizon; one to five years

>5Y: Long-term time horizon; over five years

These topics are closely linked to the business model as a digital online broker and bank with high IT and data dependency, as well as to the largely integrated value chain.

In the E1 climate change topic area, material negative impacts arise in particular from high energy consumption associated with server farms and data centres, as well as from greenhouse gas emissions resulting from business travel. In addition, climate-related potential negative impacts on the workforce, for example due to rising health

risks, were considered material. These impacts are directly linked to the business model, as service delivery relies on stable IT operations and requires reliability in terms of energy supply for office spaces and data centres.

In the S1 workforce topic area, both positive and negative material impacts were identified. The actual positive impacts include the contribution to well-being through employment, the provision of secure jobs, adequate wages, and support through continuing education. Potentially

negative impacts identified include, among others, increased workloads due to overtime, an inadequate work-life balance, and a lack of physical activity resulting from office work. These aspects are strategically relevant, as value creation relies heavily on specialized skilled workers, and the ability to deliver services depends on the recruitment, development, and retention of qualified employees.

In the S4 topic area, Consumers and End Users, a key potential negative impact identified was that data protection incidents can violate the personal rights of consumers and end users, for example through cyberattacks or improper handling of data. Additionally, key positive impacts identified included the provision of ESG products and the promotion of financial stability for end users. The connection to the business model and strategy stems from the digital delivery of services and the processing of sensitive customer and transaction data throughout the entire customer relationship.

In the G1 Corporate Policy topic area, material impacts considered included aspects of corporate culture, the protection of whistleblowers, as well as potential negative consequences of inadequate whistleblowing mechanisms and negative impacts from incidents of corruption and bribery. As a capital market-oriented company, flatexDEGIRO is particularly dependent on the trust of customers, investors, and regulators, meaning that business conduct topics are strategically relevant and are addressed in governance and compliance systems.

The interdependencies between material impacts, risks and opportunities on the one hand, and the business model, strategy, and value chain on the other, are supported in sustainability management by linking the materiality results to the prioritization of measures and to the risk management process. The materiality analysis was conducted with the involvement of relevant functions, including ESG, Compliance, Procurement, risk management, and HR, to consistently embed the assessment and derivation of measures.

As part of the analysis, additional ESRS topics were also examined and classified based on the corporate structure, digital value creation, and geographical and supply chain-related conditions. For example, S2 Labor in the value chain

was classified as not relevant, as no locations in countries with elevated human rights or corruption risks were identified within the scope of consolidation or among suppliers, and service delivery does not depend on labor-intensive production processes.

#### **Time horizons of material impacts**

The material actual and potential impacts were classified as short-term (up to one year), medium-term (one to five years), or long-term (over five years) in accordance with the definitions described in the "Time Horizons" section. Climate-related impacts arise both in the short term (e.g., greenhouse gas emissions from business travel and energy consumption in IT operations) and in the medium to long term (e.g., physical climate risks for data centre operations and climate-related health risks for employees). Impacts in topic area S1 (working conditions, health and safety, and development) can arise in the short term and, particularly in the case of structural issues such as work-life balance or skills development, also have medium- and long-term effects. Potential impacts in topic area S4 (data protection and access to information/products) are predominantly effective in the short to medium term but can also have long-term effects in the event of a loss of trust or regulatory consequences. Governance-related impacts (whistleblower systems, compliance) typically have short-term effects through individual cases and medium- to long-term effects through corporate culture, trust, and regulatory expectations.

#### **Financial Effects of Material Risks and Opportunities (Current)**

The financial impacts of material sustainability risks and opportunities are assessed within the framework of DMA's financial materiality perspective and Group-wide risk management and are considered in planning and risk management. In the 2025 reporting year, financial effects are evident particularly in the form of operating expenses (e.g., energy costs, IT security, personnel expenses) as well as potential damages in the event of data protection and cyber incidents or compliance violations. Based on the information available as of the reporting date, no concrete indications were identified that the material sustainability risks would result in a significant need to adjust the carrying amounts of assets or liabilities within the next reporting year; nevertheless, such effects may arise in the event of

extraordinary occurrences (e.g., severe cyberattacks or regulatory sanctions).

### **Anticipated financial effects (short-, medium-, and long-term)**

In the short term, flatexDEGIRO anticipates that factors affecting the cost base (e.g., energy prices, regulatory reporting costs) and potential one-time effects from loss events will be the primary drivers. In the medium term, investments in IT infrastructure, cybersecurity and data protection measures, energy efficiency, and HR programs to attract and retain skilled workers may lead to increased expenses; at the same time, efficiency potentials, including through the optimization of IT operations and process digitization, are being addressed. In the long term, physical climate risks in particular (e.g., the impact of extreme heat on data centres and energy supply), as well as changes in customer preferences and regulation, may lead to structural effects on costs and revenues. Revenue opportunities arise in particular from the further development of the product and information offering (including new products) and from strengthening customer trust through high standards in data protection, service quality, and availability. Quantitative estimates of financial impacts cannot be made with sufficient reliability for all topics due to estimation uncertainty regarding outcomes and dependence on exogenous factors; for climate-related transition and physical risks, scenario analyses are conducted and financial impacts are estimated as part of the planning cycle (see section ESRS E1-SBM-3).

### **Resilience of Strategy and Business Model**

The resilience of the strategy and business model with regard to material sustainability impacts and risks is assessed as part of the established strategy and planning process and through integration with risk management and the internal control system. For climate-related risks, a structured resilience analysis is conducted using scenario analyses and integration into the stress testing framework (see section ESRS E1-SBM-3). For other material topics, resilience aspects are addressed in particular through human resources management (recruitment, development, and retention), governance and compliance systems (including whistleblower systems and anti-corruption measures), as well as IT and data protection processes. The assessment is conducted across the ESRS time horizons and focuses in particular on the business model's

dependence on stable digital platforms, qualified employees, and the trust of customers and regulatory authorities. The findings are incorporated into the prioritization of measures, resource allocation, and the further development of management systems.

### **Coverage by ESRS and Company-Specific Disclosures**

The material impacts, risks and opportunities identified in the DMA are addressed in this report through the disclosure requirements of the topic-specific standards ESRS E1 (Climate change), ESRS S1 (Own workforce), ESRS S4 (Consumers and end-users), and ESRS G1 (Business conduct). Furthermore, no additional material impacts, risks or opportunities were identified for the 2025 fiscal year that are not covered by ESRS disclosure requirements and therefore require additional company-specific disclosures.

## **E1-SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model**

flatexDEGIRO regularly reviews the resilience of its strategy and business model with regard to climate change to assess whether its own business model can be sustained over an appropriately long, multi-year period.

As part of the resilience analysis, flatexDEGIRO's own operations as well as its entire upstream and downstream value chain are examined. No material transition risks or physical risks are excluded from the analysis. The resilience analysis is an integral part of the overall strategic planning, the overarching stress-testing framework, and the business environment scan conducted. It serves to identify the need for adjustments to the business model at an early stage and to initiate appropriate strategic risk management measures. In doing so, the impacts of risks (in particular physical and transition risks caused by climate change) are considered in a forward-looking analysis.

The assessment of risks related to climate change will be conducted annually starting in fiscal year 2025 as part of the risk inventory and the DMA and updated in close coordination with strategic planning. Various climate scenarios consistent with scientific findings are used for this purpose. For the physical risk analysis, Representative Concentration Pathways (RCPs) are used, specifically the RCP scenarios RCP2.4, RCP4.5, RCP6.0, and RCP8.5. A

dedicated ESG scenario was developed for the analysis of transition risks, which considers climate-related transition events based on the transition events in the reference scenarios published by the Network for Greening the Financial System (NGFS), specifically the reference scenarios "Low Demand" and "Net Zero 2050." Due to their scientific quality and international acceptance, these reference scenarios are used as a standard framework for assessing transition and physical risks and are considered representative of the current state of the art. Overall, these physical and transition scenarios reflect various climate hazards such as flooding and heat stress, as well as alternative developments in macroeconomic conditions, energy prices, the energy mix, and technological advancements.

Furthermore, the resilience of the business model to the identified climate transition and physical risks is assessed by integrating the results of the scenario analyses into the existing stress testing framework. By linking this to the risk-bearing capacity assessment, the analysis examines the extent to which flatexDEGIRO remains operationally capable even under adverse climate developments. This integration ensures a systematic assessment of the resilience of core business activities and supports the ongoing safeguarding of the company's financial and operational resilience.

The objective of the analysis is to assess the resilience of flatexDEGIRO's strategic direction and business model under various conditions, including adverse ones. In doing so, different macroeconomic and regulatory developments are considered to evaluate potential impacts on the business model and risk profile. The analysis is based on assumptions that consider potential regulatory tightening in the area of climate change mitigation, changes in investment and financing conditions, technological conversion and adaptation costs, as well as market changes resulting from an accelerated transition to a low-carbon economy. In addition, scenarios involving a significant rise in energy costs or an increase in extreme weather events are also considered to comprehensively assess the robustness of the strategic and operational orientation.

The scenarios are applied over a multi-year time horizon (short-, medium-, and long-term), analogous to the time

horizons of other sustainability reporting, to ensure that climate-related risks and opportunities are taken into account in both the business model analysis and in stress tests for operational risk and business risk, as well as for the setting of emission reduction targets. As part of the physical risk analysis, the RCP scenarios are considered with projections through the year 2100. The ESG scenario, which examines transition events, is limited to flatexDEGIRO's planning cycle through 2029. The Business Environment Scan conducted in fiscal year 2024 serves to analyze transition events over the long-term time horizon that extend beyond the planning cycle of the developed ESG scenario.

The results of the analyses confirm the fundamental resilience of flatexDEGIRO's business model and strategic direction in the face of climate-related risks. Even when adverse scenarios are considered, there are currently no indications of any impairment to the company's ability to continue as a going concern or of any significant need for adaptation.

Uncertainties arise primarily from further political and regulatory developments in the area of climate and environmental protection, the pace of technological change, and the adaptability of market participants. Such developments may impact the profitability of existing business models, both for flatexDEGIRO and its customers. These uncertainties are considered in strategic planning, as well as in long-term investment decisions and climate protection measures.

However, climate scenarios do not provide point forecasts but rather ranges; in particular, the temporal probability of occurrence and the local severity of extreme events (e.g., flooding or heat stress) at individual locations may deviate from the modeled values. For transition risks, developments in CO<sub>2</sub> prices, energy prices, regulatory requirements, and technological cost curves can only be predicted with limited reliability. The quantification of financial effects is therefore based in part on expert estimates and is sensitive to parameter assumptions. However, the decentralized structures and the geographic diversification of locations and data centres within Europe help to limit potential physical risks. Given the current business and risk strategy, which does not foresee any significant investments in the lending business, there are no material long-term

consequences for the loan portfolio. Likewise, the decentralized structures and the geographic diversification of locations and data centres within Europe help to limit potential physical risks.

flatexDEGIRO currently sees no immediate need to adapt its business model due to climate-related risks. The existing business model has proven resilient across all scenarios considered. In the medium term (1–5 years), potential adaptation needs are expected to arise primarily from transition risks, such as evolving regulatory requirements, changing customer preferences, and technological developments. These aspects are addressed within the ongoing risk inventory and strategic planning, as well as through the developed ESG transition scenario within the planning cycle; any measures would primarily concern the further development of IT and data architectures (including ESG reporting and product information processes), the operational energy supply of the locations, and business continuity and outsourcing concepts. In the long term (>5 years), physical risks, particularly heat extremes and flooding, may increase the resilience requirements for critical infrastructure (especially data centres and network systems). Potential courses of action in the long term would primarily include additional redundancies and protective measures, as well as, if necessary, site-specific adjustments, including the relocation of data center capacities to less exposed regions. Transitional events extending beyond the planning cycle are additionally considered in the Business Environment Scan. Nevertheless, the company possesses the necessary structural, organizational, and financial capacities to respond to changing climate-related conditions as needed, particularly with regard to ensuring continuous access to financing at affordable capital costs, the realignment of its product and service portfolio, or the retraining of its workforce.

### S1-SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The workforce consists primarily of employees in direct employment relationships who work in various departments. The entire workforce is employed in EU countries, with a concentration in Germany, the Netherlands, and Bulgaria. In addition, flatexDEGIRO

employs a limited number of freelancers and external service providers, particularly in the areas of IT and specialized consulting. This group is not part of the regular workforce and is hired as needed to bridge periods of peak workload.

The work performed at flatexDEGIRO takes place almost exclusively at the office, which may lead to a lack of physical activity among the workforce under certain circumstances. Systemic negative impacts, such as child labour, are ruled out.

Regular employee surveys and “pulse checks,” ongoing communication with workers' representatives, and direct dialogue with the workforce have a positive impact on the further development of working conditions and support services. The insights gained are specifically incorporated into the optimization of benefit structures and help to strengthen employee satisfaction and retention. External workers (contract workers) are not included in this evaluation and development process.

Two material opportunities were identified within the DMA that stem from the company's own workforce. The ability to achieve work-life balance offers the potential to increase employee satisfaction and resilience, which boosts employee efficiency and has a positive impact on financial results in the medium term. Social dialogue also promotes employees' identification with the organization as well as employee retention and motivation, which leads to higher productivity and efficiency and has positive effects on the company's results.

As already outlined in E1-1, flatexDEGIRO currently has no transition plan for reducing CO<sub>2</sub> emissions; the development of such a plan is planned for the future. However, due to its low-emission business model as a purely online brokerage platform without physical production or logistics processes, no material impacts on its own workforce are expected in the future with regard to restructuring, job losses, or retraining measures in connection with climate transition plans.

flatexDEGIRO has locations only within the European Union, where high labor standards apply. As a financial services company, there are no risks regarding incidents of forced or child labour in its own business operations.

## IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

To determine the sustainability matters subject to reporting under the European Sustainability Reporting Standards, the flatexDEGIRO Group conducted a DMA in 2024/25 as part of its reporting under the CSRD and ESRS. The analysis is based on the ESRS published in the Official Journal of the EU, including Delegated Regulation (EU) 2023/2772. In addition, the EFRAG Implementation Guidance, particularly IG 1, was used as a framework for interpretation.

In accordance with the ESRS approach, the overall process is divided into an impact materiality perspective and a financial materiality perspective, with the assessment of risks and opportunities building on the previously conducted identification and evaluation of impacts. To identify topics, a long list was first created, comprising the sustainability matters from ESRS 1 AR 16 and supplemented with company-specific considerations. This supplement incorporated, among other things, key topics from a peer group analysis, rating-relevant topics, a geographic mapping, and ESG risk drivers from risk management, including findings from a business environment scan in accordance with the guidelines of the EBA consultation paper EBA CP 2024 02. In doing so, we examined whether new topics could be addressed through a combination of existing ESRS topics to avoid redundancies.

Subsequently, the long list was prioritized topic by topic in collaboration with external experts and condensed into a medium list. In doing so, employees were specifically involved who, due to their roles, regularly engage with affected stakeholders and systematically gather their perspectives (e.g., through employee dialogues and surveys, customer and supplier communication, complaint and whistleblower systems, as well as ongoing communication with supervisory and regulatory authorities). These employees and external experts were thus utilized as qualified representatives of the interests of affected stakeholders by incorporating their concerns and feedback into the prioritization and plausibility assessment of the topics. The resulting medium list was subsequently validated by the responsible employee and reviewed together with the external experts.

The analysis takes into account the entire value chain and encompasses the company's own operations as well as upstream and downstream value chain stages. Due to the digital business model and the absence of production processes, the value chain is less complex compared to many other industries; nevertheless, the key components were systematically incorporated across all process steps. This included taking the value chain into account when selecting relevant topics with impact stakeholders, when defining the impacts to be assessed, when conducting the impact assessment, during interviews with financial stakeholders, and when identifying and structuring risks and opportunities along the value chain according to probability, impact, time horizon, and control measures.

For the impact materiality perspective, impact stakeholders were identified in consultation with external experts and systematically engaged via a customized, tool-supported survey to obtain a broad range of opinions on key topics from a stakeholder perspective early in the process. A total of 104 participants were included, comprising 91 employees, 4 customers, and 9 suppliers. For employees, particular consideration was given to managers and employees whose roles involve sustainability; suppliers were selected from the 60 most important suppliers based on net invoice volume; and customers were selected as key customers based on revenue criteria. For each ESG area, participants were instructed on how many topics to select; at the same time, they had the option to name additional topics they considered important to ensure no potentially relevant topics were excluded. The results of this survey were statistically analyzed, weighted, and compiled into a shortlist. Based on the shortlist, specific impact categories were defined, described, classified as actual or potential as well as positive or negative impacts, and assigned to stages of the value chain and time horizons of up to one year, one to five years, and over five years.

The impacts were assessed in the online tool using the ESRS criteria of magnitude, scope, and irreversibility to determine severity, and, for potential impacts, additionally based on probability of occurrence. The assessments were conducted by relevant internal functions, including Sustainability, HR, risk management, and Compliance, with content-related guidance provided by external experts. The results were statistically analyzed, with the mean value serving as the key metric. A severity score was derived from

magnitude, scope, and irreversibility; for potential impacts, this was supplemented by probability of occurrence to form an impact score, which was then used as the basis for prioritizing the issues. For the materiality of the impacts, a threshold was established based on the statistical analysis and subsequently validated qualitatively, with stakeholder feedback, scientific data, ratings, and peer group analyses incorporated into the threshold determination. A predefined threshold was deliberately avoided to reduce the risk of bias. In the applied procedure, a quantitative threshold of 3.083 was used, and borderline cases were analyzed qualitatively. Additionally, it was taken into account that, according to ESRS 1 AR 11, a single assessment dimension can already lead to an impact being classified as severe and thus material.

For the financial materiality perspective, financial stakeholders were identified in consultation with external experts and engaged through interviews to identify additional financial risks and opportunities, to capture the interactions between material impact topics and financial risks and opportunities, and to also consider topics that may have financial relevance independently of the material impacts. The interviews were based on the results of the impact analysis, the ENCORE Nature risk database, and the experience of external experts. In addition to the impact topics already identified as material, all other topics from ESRS 1 AR 16 were included in the interviews to broaden the range of topics. The identification and assessment of financial risks and opportunities was subsequently carried out by the internal risk management team based on the probability of occurrence and the potential financial impact. The financial effect was assessed in consultation with risk management using quantitative and qualitative dimensions, measured against the impact on the planned annual result, risk coverage capital, and/or equity, and operationalized using a six-point scale. Risks that cannot be reliably measured in monetary terms, such as reputation or customer trust, were assessed qualitatively. The probability of occurrence was also assessed on a six-point scale based on the expected frequency of occurrence, ranging from daily to once every ten years.

The materiality threshold for financial materiality was determined in accordance with the materiality thresholds for financial reporting and in consultation with risk management. The selected thresholds were reviewed by

representative company representatives and finally approved by the Management Board.

## E1-IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities

### Scope and Methodological Basis

The calculation of greenhouse gas emissions (GHG emissions) underlying the climate targets is performed for the company's own energy consumption (Scope 1 and Scope 2) as well as for energy consumption in upstream and downstream activities along the value chain (Scope 3). The methodology is based on the internationally established Greenhouse Gas Protocol.

### Objectives of data collection and integration into the materiality assessment

The majority of total GHG emissions result from indirect GHG emissions generated by upstream and downstream activities. The collection of this data serves, on the one hand, as a basis for emissions reduction in our own operations and, on the other hand, to reduce emissions in the value chain through targeted measures in collaboration with suppliers and customers. As part of the DMA conducted, actual and potential GHG emissions for our own operations as well as along the value chain were determined and systematically analyzed; the results are incorporated into the assessment of climate-related impacts, risks and opportunities.

In the course of this analysis, the key emission sources resulting directly from business activities were identified. These include the operation of the vehicle fleet, mobility emissions from business travel, and purchased electricity / electricity procurement for business operations, including building heating and cooling. In addition, Scope 3 emissions were identified, particularly in the area of material procurement.

### Assessment of Climate Impact, Leverage Points, and Reduction Potential

flatexDEGIRO assesses its actual and potential impacts on climate change by quantifying its total greenhouse gas emissions. The analysis is based on the collection of

operational data regarding the emission sources of the vehicle fleet, electricity consumption, and business travel. Using this data, the most significant emission sources and their respective contributions to the overall climate impact are quantified. Additionally, an analysis is conducted to determine which measures for reducing these emissions are technically feasible and economically viable. In this context, the direct and indirect opportunities for influence on all key emission sources are also assessed.

### Limits of influence and focus areas

In addition, Scope 3 emissions are primarily captured and assessed from the upstream value chain. It was recognized that optimizing and reducing emissions in this category is difficult due to limited control options and a lack of data transparency among suppliers. When assessing reduction potential, care is taken to appropriately account for the varying degrees of influence: While Scope 1 and Scope 2 emissions can be directly controlled through operational measures, Scope 3 emissions require a more strategic approach due to limited control options. This approach focuses on categories where immediate reduction is possible through targeted measures, such as business travel (e.g., promoting teleconferences and prioritizing rail travel over air travel).

### Continuous monitoring and linkage to ESRS disclosures

The identified emission sources are subject to continuous monitoring to detect and assess potential changes or new emission drivers early on. The procedures described for determining and assessing climate-related impacts are specified and quantified by the information disclosed under disclosure requirement E1-6 regarding greenhouse gas emissions under Scopes 1, 2, and 3, as well as disclosure requirement E1-5 – Energy consumption and mix. The operation of the vehicle fleet is classified as Scope 1 emissions, while electricity consumption is recorded as Scope 2 emissions. Scope 3 emissions, particularly those from the upstream value chain, are recorded and disclosed; it should be noted that a complete reduction of these emissions is only partially feasible due to control and transparency deficits. Continuous monitoring of these categories makes it possible to verify the effectiveness of implemented or planned emissions reduction measures and to track the achievement of defined climate protection

targets, insofar as these are within the company's direct sphere of influence.

### Climate-related physical risks

Various climate hazards were identified, and their potential effects on assets and business operations were assessed. Extreme heat and flooding events proved to be particularly relevant. As part of the physical risk analysis, a detailed analysis was conducted for the server locations based on site-specific data (e.g., regarding expected maximum flood levels per year, the expected magnitude of 100-year floods, or expected annual heatwave days), due to their particular relevance to flatexDEGIRO's business continuity. For other assets and business activities, climate risks were assessed by subject matter experts at a higher level. Against the backdrop of the climate hazards identified as particularly relevant (especially extreme heat and flooding events), consideration was given to the extent to which flatexDEGIRO's assets and business activities may be vulnerable. Due to the digital business model as an online broker and financial technology provider, business operations are particularly dependent on the availability of critical IT infrastructure. Accordingly, the highest vulnerability lies with the data centres (core business of online brokerage and IT services) as well as the associated technical equipment (including server, network, and power supply components): Flooding can lead to physical damage, restricted accessibility, and, in extreme cases, operational disruptions; heat waves can impair cooling capacity, increase energy demand, and thereby jeopardize operational stability. Since data centres are location-bound in the short term and some individual locations are situated near flood-prone areas, this may necessitate relocations or additional protective measures in the medium to long term.

Other assets and business activities (particularly office locations and local operational processes), by contrast, are physically vulnerable to a lesser extent. Potential effects arise primarily indirectly, e.g., through heat-related restrictions on working conditions or productivity, or through temporary accessibility and logistical constraints during extreme weather events; the impacts would primarily manifest in additional operational expenses (e.g., energy and operating costs) and in the need for additional organizational measures.

In terms of financial activities, there are no significant direct physical exposures arising from traditional real estate loans; the short- to medium-term strategic focus in the lending business is on low-risk, asset-backed loans. Physical climate risks can primarily affect the securities pledged as collateral indirectly through market value, volatility, and liquidity effects; the extent of this vulnerability is limited by conservative collateralization and monitoring mechanisms. For the interest-bearing proprietary investments held in treasury (primarily security-oriented securities positions, including government and state bonds and other liquid bond positions), the vulnerability is also predominantly indirect and arises in particular from potential credit- or valuation-related effects resulting from climate-related events.

The scenarios are applied over a multi-year time horizon (short-, medium-, and long-term), analogous to the time horizons of the broader sustainability reporting and cover the entire strategic planning horizon of flatexDEGIRO.

In identifying and assessing physical risks, it was considered that flatexDEGIRO's data centres (core business: online brokerage and IT services) are currently location-bound and that are partially located near flood-prone areas. This may necessitate relocations or additional protective measures in the medium to long term. With regard to the loan portfolio of flatexDEGIRO Bank SE, the short- to medium-term strategic focus is on low-risk, securities-backed loans. In light of physical risks, the negative impacts of climate change (short-, medium-, and long-term) on the value of securities pledged as collateral are of particular relevance, as are the government and currency bonds held in the treasury business, primarily in the Northern Hemisphere, and the residential and infrastructure investments. Under the internal investment policy, interest-bearing proprietary investments are managed based on current business and medium-term planning, as well as a regular review of target achievement during the year. The protection of invested capital is the primary focus.

### Climate-related transition risks

Key identified transition events relate in particular to new EU regulations aimed at accelerating the decarbonisation of the financial sector, the introduction of expanded green reporting standards, and the market's increasing focus on ESG-compliant investment products. On the one hand,

these can lead to burdens for flatexDEGIRO due to credit risks arising from business with customers, and on the other hand, they can result in higher costs for flatexDEGIRO and its business operations. Changes in customers' income or financial circumstances may have a negative impact on demand for financial products or services. In addition, technological and competitive developments were considered, including the necessary development of a compliant system architecture, rising investor demand for ESG products, and the resulting competitive pressure from fintech providers with advanced ESG capabilities. The potential impact on customer demand and stakeholder perception could have significant negative effects on business performance and the company's image. The relevance of these transition events was analyzed for flatexDEGIRO across all time horizons.

As part of the identification and assessment of climate-related risks and opportunities (including as part of the risk inventory and the IRO assessment), climate-related transition events were identified and analyzed across the relevant time horizons. Significant transition risks arise in particular from new EU regulations aimed at accelerating the decarbonisation of the financial sector, as well as from expanded green reporting standards, which may entail additional requirements for data, processes, governance, and system support. In addition, technological and competitive developments were considered, including the further development of system architecture, rising investor demand for sustainable products, and competitive pressure from neobrokers. These developments may also give rise to transition opportunities, particularly through a potential market shift toward sustainable investment products and the opportunity to further develop and position corresponding offerings. Expected financial effects of these transition events were derived for the transition scenario over a five-year period in the planning cycle, taking into account probability, magnitude, and duration. No assets or business activities were identified that are incompatible with the transition to a climate-neutral economy.

flatexDEGIRO has assessed the extent to which its assets and business activities could be exposed to the identified transition events. Considering probability, magnitude, and duration, the expected financial effects were quantified. This quantification was performed by various experts at flatexDEGIRO. No assets or business activities were

identified that are incompatible with the transition to a climate-neutral economy. For an overview of taxonomy-eligible and taxonomy-compliant activities, please refer to the section “Disclosures pursuant to Article 8 of Regulation 2020/852 (on the EU Taxonomy Regulation).”

When identifying and assessing risks and opportunities, flatexDEGIRO takes science-based climate scenarios into account. This includes both high-emission scenarios and those consistent with a successful transition in line with the 1.5 °C target. The analysis is conducted across the time horizons relevant to sustainability reporting and encompasses both potential financial impacts from physical climate hazards, such as extreme weather events, and from transition risks, such as changes resulting from regulatory and technological transformation processes. For the transition scenario, the financial effects were quantified over a five-year period within the planning cycle. The quantification was based on expert assessments.

The transition scenario assumes a limitation of global warming to approximately 1.5 °C and accelerated decarbonisation of the financial sector. Political and regulatory drivers, particularly new EU requirements, expanded green reporting standards, and the preference for ESG products, increase the pressure on flatexDEGIRO to adapt. At the same time, technological requirements and the rising demand for sustainable investment products are changing the competitive landscape. The physical scenarios assume warming of over 2 °C up to 4.5 °C, coupled with more frequent heat waves, heavier precipitation, flood risks, droughts, strong winds, and rising sea levels. These climatic drivers increase the strain on critical infrastructure and can lead to operational disruptions and outages of data centres and network systems. For flatexDEGIRO, this poses particular risks to platform stability and business continuity.

The assumptions regarding the transition scenarios are based primarily on regulatory trends and reflect established policy scenarios. The physical assumptions are based on modeling by external experts and consider the precise location data of the data centres. The scenarios used are subject to the usual uncertainties of climate-economic analyses, particularly regarding the temporal probability of extreme events and long-term macroeconomic feedback loops.

flatexDEGIRO’s consolidated financial statements do not contain any assumptions that can be classified as critical with regard to climate-related risks.

## G1-IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

flatexDEGIRO has established a structured process for identifying, assessing, and managing material impacts, risks, and opportunities related to corporate governance aspects. This process is an integral part of the Group-wide governance, risk, and compliance framework and is closely linked to the Group’s internal control system, risk management system, and corporate governance structure.

Potential governance-related impacts, risks, and opportunities are identified systematically and regularly as part of the Group-wide risk inventory and, additionally, during the DMA. In particular, risks and opportunities related to business ethics, anti-bribery, anti-money laundering prevention, conflicts of interest, whistleblower systems, data protection, supplier relationships, and political influence are considered. ESG risk drivers are not treated as a separate risk category but are analyzed as factors influencing existing risk categories, particularly operational risks and business risks.

The assessment of the identified IROs is conducted from both an impact materiality perspective and a financial materiality perspective. From the impact materiality perspective, actual and potential effects on internal and external stakeholders along the value chain are considered. In particular, the severity, probability of occurrence, and scope of potential negative effects, as well as potential positive effects resulting from effective governance structures, are evaluated. From a financial materiality perspective, risks and opportunities are analyzed with regard to their potential impacts on earnings, capital adequacy, liquidity, and regulatory capital requirements. Quantitative methods, scenario analyses, and stress tests are applied, which are embedded in the normative and economic risk-bearing capacity assessment.

Relevant functions are involved on a cross-functional basis. Compliance, anti-money laundering, risk, audit, HR, and

ESG functions provide structured input for the identification and assessment of governance-related risks. Information from the whistleblower system, insights from internal and external audits, findings from the internal control system, and regulatory requirements are systematically incorporated into the assessment. The results are compiled and presented to the Management Board and the relevant committees of the Supervisory Board as part of regular risk reporting.

The management of identified material IROs is carried out through clearly defined action plans, policy adjustments, training programs, and, where necessary, organizational changes. Implementation is monitored and documented as part of the established governance and reporting processes. Material findings are discussed in the relevant committees and escalated as needed.

The results form the basis for determining the reportable topics in accordance with ESRS G1 and for prioritizing measures to strengthen corporate culture and the integrity of business operations. Through systematic integration into the existing governance and risk management system, flatexDEGIRO ensures that aspects of corporate governance are strategically managed, monitored, and continuously developed.

## IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The flatexDEGIRO Group's sustainability statement was prepared based on the DMA and covers the general disclosure requirements of the ESRS, including the disclosures set forth in ESRS 2 regarding governance, strategy, management of impacts, risks and opportunities, as well as key performance indicators and targets. For topic-specific reporting, the disclosure requirements of those ESRS topic standards are met whose sustainability matters were identified as material in the DMA. The following topics were determined to be material: climate change according to ESRS E1, own workforce according to ESRS S1, consumers and end-users according to ESRS S4, and corporate governance according to ESRS G1.

Disclosure requirements from the topic-specific standards ESRS E2 – Pollution, ESRS E3 – Water and marine resources, ESRS E4 – Biodiversity and ecosystems, ESRS E5 – Resource use and circular economy, ESRS S2 – Workers in the value chain, and ESRS S3 – Affected communities are not covered by the sustainability statement, as these topics were not classified as material at DMA. This classification was supported, among other things, by methodological validations and currency checks, such as the analysis of biodiversity-sensitive areas, which was repeated and verified in August 2025, the assessment of water stress and water consumption at the sites, and the geographic mapping of human rights and corruption risks along the value chain.

### Disclosure Requirements Covered

Disclosure requirement	Page number
BP-1 – General basis for preparation of the sustainability statement	6
BP-2 – Disclosures related to specific circumstances	7
GOV-1 – The role of the administrative, management and supervisory bodies	10
GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	11
GOV-3 – Integration of sustainability-related performance in incentive schemes	12
GOV-4 – Statement on due diligence	13
GOV-5 – Risk management and internal controls over sustainability reporting	13

<b>Disclosure requirement</b>	<b>Page number</b>
SBM-1 – Strategy, business model and value chain	15
SBM-2 – Interests and views of stakeholders	17
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	18
IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	27
IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	32
E1-1 – Transition plan for climate change mitigation	76
E1-2 – Policies related to climate change mitigation and climate change adaptation	76
E1-3 – Actions and resources related to climate policies	78
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E1-5 – Energy consumption and mix	83
E1-6 – Gross GHG emissions from Scope 1, 2, and 3 categories, as well as total GHG emissions	84
E1-7 – GHG removals and GHG mitigation projects financed through carbon credits	88
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S1-4 – Actions taken regarding material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, as well as the effectiveness of those actions and approaches	98
S1-5 – Objectives related to addressing material adverse impacts, promoting positive impacts, and managing material risks and opportunities	100
S1-6 – Characteristics of the undertaking's employees	101
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S1-16 – Remuneration metrics (pay gap and total remuneration)	104
S1-17 – Incidents, complaints and severe human rights impacts	105
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**List of data points in general and topic-specific standards arising from other EU legislation (in accordance with ESRS 2, Annex B)**

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
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[5], Annex II		10
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		10
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				13
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		not 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		not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818[7], Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		not material
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		not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050				Regulation (EU) 2021/1119, Article 2(1)	76

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
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		76
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		81
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				not material
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				83
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				83
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)		84
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)		84

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	88
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		not material
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.			not material
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			not material
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		not material
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				not material
ESRS E3-1					not material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				not 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				not material
ESRS 2- SBM-3 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				not material
ESRS 2- SBM-3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				not material
ESRS 2- SBM-3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				not material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				not material
ESRS E5-5					not material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				not material
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				not material
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				91
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		91
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				not material
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				91
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				96
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		104
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				104
ESRS S1-16					104

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				104
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Material, not reported in accordance with relief for phased-in disclosure requirements as of December 31, 2025
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)		Material, not reported in accordance with relief for phased-in disclosure requirements as of December 31, 2025
ESRS 2- SBM-3 – 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				not material
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				not material
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		not material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
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				not 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				not 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)		not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material, not reported in accordance with relief for phased-in disclosure requirements as of December 31, 2025
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)		not material
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				not material
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ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				108
ESRS G1-4					113

<b>Disclosure Requirement and related datapoint</b>	<b>SFDR reference</b>	<b>Pillar 3 reference</b>	<b>Benchmark Regulation reference</b>	<b>EU Climate Law reference</b>	<b>Page number</b>
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)		
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				113

# C | Environmental information

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# Environmental information

## Reporting in accordance with Article 8 of the EU Taxonomy Regulation)

### General background on the application of the EU Taxonomy Regulation

As part of the EU Action Plan on Sustainable Finance, the redirection of capital flows into sustainable investments is a key objective. Against this backdrop, Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (hereinafter referred to as the EU Taxonomy Regulation) came into force, which establishes a uniform and legally binding classification system to determine which economic activities in the EU are considered “environmentally sustainable”. The results of this classification must be reported annually on a company-specific basis. In 2021 and 2022, Article 9 of the EU Taxonomy Regulation initially defined criteria for the environmental objectives “Climate Change Mitigation (CCM)” and “Climate Change Adaptation (CCA).” In June 2023, the criteria for the remaining four environmental objectives (3–6) were adopted: “Sustainable Use and Protection of Water and Marine Resources” (Water and Marine Resources (WTR)), “Transition to a Circular Economy” (Circular Economy (CE)), “Pollution Prevention and Control” (PPC), and “Protection and Restoration of Biodiversity and Ecosystems” (Biodiversity and Ecosystems (BIO)). The EU Taxonomy Regulation currently comprises the following delegated acts:

- Delegated Regulation (EU) 2021/2139 of June 4, 2021, on the two climate-related environmental objectives
- Delegated Regulation (EU) 2021/2178 of July 6, 2021, on reporting and the disclosure templates
- Delegated Regulation (EU) 2022/1214 of March 9, 2022, on the inclusion of new economic activities (related to nuclear energy and natural gas) regarding the two climate-related environmental objectives and on the revision of reporting
- Delegated Regulation (EU) 2023/2485 of June 27, 2023, on the revision of existing and the inclusion of new economic activities regarding the two climate-related environmental objectives
- Delegated Regulation (EU) 2023/2486 of June 27, 2023, on the inclusion of new economic activities regarding the four non-climate-related environmental objectives and on the revision of reporting

- Delegated Regulation (EU) 2026/73, dated January 8, 2026, amending Commission Delegated Regulation (EU) 2021/2178 regarding the simplification of the content and presentation of information to be disclosed on environmentally sustainable activities, and Delegated Acts (EU) 2021/2139 and (EU) 2023/2486.

In 2025, as part of the “Omnibus” regulatory initiative, the European Commission revised the EU Taxonomy reporting requirements to enhance simplicity and practicability. Consequently, the EU Taxonomy Regulation and the associated Delegated Regulations were subject to substantive changes in a new Delegated Regulation (EU) 2026/73, which entered into force in early 2026. The new Delegated Regulation can be applied voluntarily for the 2025 financial year and will become mandatory as of 2026. The reporting requirements and reporting templates for financial and non-financial companies have been streamlined and simplified in accordance with the updated requirements. At the same time, financial companies may, under certain conditions, exercise an opt-out option for the 2025 and 2026 financial years to be exempted from EU Taxonomy reporting.

For EU Taxonomy reporting in the financial year 2025, we are already following the updated requirements under (EU) 2026/73. This entails, in particular, the first-time application of materiality thresholds and the disclosure of KPIs in the new reporting templates.

In order to classify an economic activity as “environmentally sustainable” within the meaning of the EU Taxonomy Regulation, a distinction must be made between taxonomy eligibility and taxonomy alignment. The first step is to check whether an economic activity falls within the scope of the EU Taxonomy Regulation and can therefore be categorised as taxonomy-eligible. Only taxonomy-eligible economic activities that fulfil certain criteria can be considered “environmentally sustainable” and therefore taxonomy aligned. Accordingly, the second step is to evaluate whether the economic activity makes a significant contribution to an environmental objective, does not significantly compromise any other environmental objective and ensures compliance with the minimum safeguards. In order to comply with the minimum safeguards, Article 18 of the EU Taxonomy Regulation stipulates that the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the fundamental principles and rights from the eight core conventions set out in the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work (ILO Core Labour Standards) and the International Bill of Human Rights must be observed.

In addition to the Delegated Acts, the EU Commission regularly publishes FAQs that serve as statements on questions of interpretation regarding the EU Taxonomy and as practical support for its application. We closely monitor the publication of new FAQs by the EU Commission, as well as their implications/clarifications, and review their application for future reporting on a case-by-case basis. We have also taken note of the current FAQ publications and their drafts dated July 4, 2025, and December 17, 2025, and implemented them in accordance with the Delegated Acts. In line with legal requirements and IDW recommendations, we are thus continuously evaluating their future application.

#### **Impact on and Classification of flatexDEGIRO SE**

For the 2025 financial year, flatexDEGIRO SE, as a holding company, is obliged to apply the regulatory requirements of the EU Taxonomy Regulation in the context of disclosing a non-financial statement for the flatexDEGIRO Group. Pursuant to Section 315e para 1 in conjunction with Section 290 (1) (HGB), the consolidated financial statements of the flatexDEGIRO Group as of December 31, 2025, have been prepared in accordance with IFRS.

In accordance with Question 4 of the EU Taxonomy FAQs dated December 20, 2021, EU Taxonomy reporting must be conducted at the consolidated level of the parent company. Accordingly, the parent company flatexDEGIRO SE is required to disclose EU Taxonomy KPIs and qualitative information at consolidated level in accordance with Regulation (EU) 2020/852 ("EU Taxonomy Regulation") and the related legal acts, in particular (EU) 2021/2178 and (EU) 2026/73. Since flatexDEGIRO SE reports at the consolidated level as the parent company, the subsidiary flatexDEGIRO Bank AG makes use of the exemption option pursuant to Accounting Directive (EU) 2022/2464, Art. 19a (9).

The KPIs that must be reported in accordance with the EU Taxonomy therefore depends on the classification of the (parent) company that is obliged to prepare the non-financial (group) report. In accordance with the previous year's disclosure, flatexDEGIRO SE is also classified as a non-financial entity for the 2025 fiscal year in its capacity as the parent company and publishes the relevant EU Taxonomy KPIs as well as qualitative disclosures in accordance with Annexes I and II pursuant to (EU) 2021/2178 and (EU) 2026/73 at the group level as a non-financial entity.

In the 2025 fiscal year, the credit institution KPIs will also be disclosed for the first time on a voluntary basis in accordance with Question 4 of the FAQs dated December 20, 2021. For this purpose, the corresponding reporting templates from Annex VI of the new Delegated Regulation (EU) 2026/73 (in accordance with Question 5 of the FAQ dated December 20, 2021)

will be used to ensure comparability and consistency. The voluntary disclosure serves to provide a more representative presentation of our business model as a broker whose core activities include, among other things, banking operations. This disclosure is separate from the mandatory information and is marked as voluntary information at the end of this chapter.

In the European Commission's FAQ dated November 8, 2024, companies are required to additionally report a mixed KPI for mixed groups. Since the mandatory reporting of a mixed KPI is currently only formulated in the relevant FAQ document and is not included in the corresponding (amended) delegated acts, flatexDEGIRO will not report a mixed KPI separately for the 2025 financial year in accordance with the new Delegated Act. In doing so, we are following Question 4 of the EU Taxonomy FAQs dated December 20, 2021, according to which EU Taxonomy reporting is only mandatory at the consolidated level of the parent company.

#### **Reporting for the 2025 financial year as a non-financial company**

For the 2025 financial year, the shares of taxonomy-eligible and non-taxonomy-eligible as well as taxonomy-aligned and non-taxonomy-aligned economic activities in turnover, CapEx, and OpEx must be disclosed for all six environmental objectives in accordance with the reporting templates for non-financial companies. However, in accordance with Delegated Act (EU) 2026/73, this will be done for the first time subject to materiality analysis. The determination of quantitative metrics and explanations of qualitative disclosures are carried out using a "best-effort approach" and consider our current state of knowledge. Insufficient taxonomy-eligible information from suppliers and service providers, particularly among small and medium-sized entities, complicates classification. In the 2025 financial year as well, no relevant activities for Environmental Goals 2–6 were identified during a portfolio screening; alternatively, the corresponding activities were assigned to Environmental Goal (Climate Change Mitigation) based on an assessment of more appropriate the classification and to avoid double counting.

Following the amendments to the new Delegated Act, Reporting Template I regarding the supplementary nuclear and gas disclosures (deleted Annex XII (EU) 2021/2178)) will no longer be reported in the 2025 fiscal year. No corresponding activities are carried out or financed within the Group.

#### **Background Information on reporting as a non-financial company**

As part of the taxonomy eligibility analysis, a detailed portfolio screening was conducted in connection with

business activities. The analysis aims to provide a precise comparison of the activities of our business model with the listed economic activities in the Delegated Environmental Act (EU) 2021/2139, (EU) 2023/2485, (EU) 2023/2486, and (EU) 2022/1214. A detailed analysis of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) was used to identify potentially taxonomy-eligible economic activities. The items recognised in the consolidated income statement and balance sheet as well as information from external data providers were used for this purpose. IFRS accounting was used as the basis. With regard to nuclear and gas activities, no relevant activities were identified for the 2025 financial year either.

According to the new Delegated Act, the exclusion of the OpEx KPI is possible under Article 1 (1) (1d) if it is not material to the company's business model. As in previous years, the activities that can be linked to OpEx are exclusively activities 8.1 (Data processing, hosting and related activities), 6.4 (Operation of personal mobility devices, cycle logistics), and 6.5 (Transport by motorbikes, passenger cars and light commercial vehicles). However, these activities are not related to our core activities and are only of supporting nature (e.g. infrastructure and employee benefits). Thus, they do not contribute significantly to value creation in the sense of core business processes, which is also reflected in their reduced significance in the context of turnover generation (<10%). The significance with regard to the environmental or sustainability-related orientation of our OpEx is correspondingly low, as the activities in question are merely of a supporting nature. Accordingly, activities that correspond to the OPEX and fall under the EU Taxonomy are therefore not reviewed in detail for taxonomy eligibility or alignment and are thus not reported. The OpEx denominator in accordance with the EU Taxonomy amounts to EUR 14.0 million in financial year 2025.

The activities identified as taxonomy-eligible in the portfolio screening, can be also subject to a materiality analysis in accordance with Art. 1 (1) 1a-1c of the new Delegated Act. If the activities generate less than 10% of total turnover or CapEx, they can be considered as non-material and do not require further analysis.

With regard to the turnover and CapEx KPIs three activities were identified, all of which were assigned to the environmental objective "Climate Change Mitigation" (CCM) and classified as taxonomy-eligible. The detailed results for each activity are presented below.

The taxonomy-eligible economic activity "Data processing, hosting, and related activities" (CCM 8.1) encompasses "the storage, manipulation, management,

movement, control, display, brokering, exchange, transmission, or processing of data via data centers, including edge computing." Within our business activities, services are provided in this economic sector. Corresponding turnover and CapEx amounts can be recognised as taxonomy-eligible. As the flatexDEGIRO Group does not manage its own data centre space, the partial space of external providers ("operated on co-locations") was included in the evaluation. Since this activity is merely a secondary activity in our business model, both the taxonomy-eligible turnover and the CapEx amount fall below 10% of the respective KPI denominator. Thus, the activity is classified as non-material and is not subject to a detailed taxonomy-alignment assessment. The materiality of the activity is reviewed on an ongoing basis and updated annually.

The flatexDEGIRO Group has a vehicle fleet that includes both company cars and pool vehicles. This makes the economic activity of transport by motorbikes, passenger cars and light commercial vehicles (CCM 6.5) relevant as a cross-sectional activity for CapEx and OpEx, which covers the acquisition, leasing and operation of vehicles in the M1 and N1 classes (passenger cars and light commercial vehicles with a maximum total weight of 3.5 tons), among other things. As we are driving forward the (partial) electrification of our fleet, the majority of the new vehicles procured already meet the CO2 limits set by the EU Taxonomy Regulation for the "significant contribution" assessment criterion. Similar to Activity 8.1, however, the vehicle fleet is also merely a secondary activity for us, and the taxonomy-eligible CapEx amount falls below 10% of the KPI denominator. Thus, the activity is classified as immaterial and is not subject to a detailed taxonomy-alignment assessment. The materiality of the activity is reviewed on an ongoing basis and updated annually.

In addition, flatexDEGIRO Group has been offering its employees in Germany and the Netherlands the leasing service "JobRad" since May 2024, which corresponds to the economic activity "Operation of personal mobility devices, cycle logistics" (CCM 6.4) and can be included in the CapEx KPI. However, similar to the vehicle fleet, the JobRad leasing program is merely a secondary activity for us, and the taxonomy-eligible CapEx amount falls below 10% of the KPI denominator. Consequently, the activity is classified as immaterial and is not subject to a detailed taxonomy-alignment assessment. The Materiality of the activity is reviewed on an ongoing basis and updated annually.

In order to be able to report taxonomy alignment for the above economic activities, minimum social standards specified by the EU Taxonomy Regulation must be met at company level. To this end, the EU Commission refers to international frameworks such as the OECD Guidelines for Multinational Enterprises and the UN

Guiding Principles on Business and Human Rights. For the audit of the minimum social standards, we carry out a group-wide analysis with relevant criteria from the frameworks mentioned by the EU Taxonomy. This is based on the recommendations of the Platform on Sustainable Finance and corresponding publications of the EU Commission. The analysis includes topics such as compliance with human and labour rights, bribery and corruption as well as taxation, fair competition and compliance.

### Calculation of Taxonomy KPIs

The total values of the flatexDEGIRO Group, on which the calculation in accordance with the EU Taxonomy Regulation is based, amounted to EUR 559.8 million in turnover in the financial year 2025 (2024: EUR 480.0 million), EUR 40.7 million in CapEx (2024: EUR 51.0 million) and EUR 14.0 million in OpEx (2024: EUR 10.4 million). In accordance with the EU Taxonomy Regulation, turnover corresponds to the sales revenue recognised in the consolidated income statement in the consolidated financial statements. The relevant CapEx was determined on the basis of the consolidated financial statements and results from the sum of additions and changes in the scope of consolidation of property, plant and equipment, intangible assets (excluding goodwill) and right-of-use assets. In the reporting year, there was no CapEx plan defined in Annex I No. 1.1.2.2. of Delegated Regulation (EU) 2021/2178. The EU Taxonomy Regulation defines relevant OpEx as expenses for research and development, building refurbishment measures, short-term leases, maintenance and repairs and other direct expenses in connection with the maintenance of property, plant and equipment.

The data on turnover reported below as taxonomy-eligible but non-material is directly allocated to the operation of data centers in accordance with economic activity CCM 8.1. CapEx could also be allocated to activity CCM 8.1. The Economic activities CCM 6.5 and CCM 6.4 can be allocated to CapEx; however, they are also non-material for the financial year (<10% of the KPI denominator) and were not reviewed for taxonomy alignment. Double counting within the meaning of the EU Taxonomy Regulation is avoided, as taxonomy-eligible turnover can only be allocated to a single economic activity. In addition, CapEx was only allocated to the activities CCM 6.5 and CCM 6.4 if a direct connection between the financed measures and the turnover-relevant economic activity CCM 8.1 was ruled out.

As the EU Taxonomy Regulation does not yet cover our non-financial activities adequately, an aggregated view of the taxonomy eligibility of all economic activities for 2025 indicates that only a share (<10%) of turnover (2025: 0.4%, 2024: 1.3%) and CapEx (2025: 9.5%,

2024: 9.6%) that is taxonomy-eligible can be reported for the Group for 2025. As described above, the OpEx KPI is excluded in its entirety for FY 2025 due to the non-materiality of these activities for the flatexDEGIRO business model.

We continuously monitor regulatory developments and potential expansions of EU Taxonomy activities and aim to increase taxonomy alignment if such activities are material to the business model.

**Template I: Proportion of turnover, CapEx, OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities - disclosure covering year 2025 (summary KPIs)**

Financial year 2025	KPI	Total	Proportion of Taxonomy-eligible activities	Taxonomy-aligned activities	Proportion of Taxonomy-aligned activities	Breakdown by environmental objectives of Taxonomy-aligned activities					Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy-aligned activities in previous financial year (2024)	Proportion of Taxonomy-aligned activities in previous financial year (2024)	
						Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution						Biodiversity
						(6)	(7)	(8)	(9)	(10)						(11)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
<i>Text</i>	€ M	%	€ M	%	%	%	%	%	%	%	%	%	%	€ M	%	
<b>Turnover</b>	<b>559.8</b>	<b>0.4</b>	-	-	-	-	-	-	-	-	-	-	<b>0.4</b>	-	-	
<b>CapEx</b>	<b>40.7</b>	<b>9.4</b>	-	-	-	-	-	-	-	-	-	-	<b>9.4</b>	-	-	
<b>OpEx</b>	<b>14.0</b>	<b>19.2</b>	-	-	-	-	-	-	-	-	-	-	<b>19.2</b>	-	-	

Explanatory notes for Template 1:

- (N) Indicate the financial year that the reported data refers to. Columns (2) to (14) shall pertain to the financial year (N). (N-1) Indicates the previous financial year. If no data was reported for financial year N-1, leave columns (15) and (16) empty.
- Column (2) shall contain the denominator of the respective KPI.
- Column (3) shall contain the proportion of the denominator of the respective KPI that is associated with total Taxonomy-eligible economic activities regardless of whether those activities are taxonomy-aligned or not.
- Column (5) shall contain the proportion of the denominator of the respective KPI that is associated with total Taxonomy-aligned economic activities.
- Columns (6) to (11) shall contain the proportion of the denominator of the respective KPI that is associated with Taxonomy-aligned economic activities that contribute substantially to the respective environmental objective. For the respective KPI, the sum of the proportions in columns (6) to (11) shall equal to the figure in the column (5).
- Column (12) shall contain the proportion of the denominator of the respective KPI that is associated with Taxonomy-aligned economic activities that are enabling economic activities.
- Column (13) shall contain the proportion of the denominator of the respective KPI that is associated with Taxonomy-aligned economic activities that are transitional economic activities.
- Column (14) shall contain the proportion of the denominator of the respective KPI associated with economic activities that are considered non-material with respect to the respective KPI and not assessed for Taxonomy-eligibility and Taxonomy-alignment in accordance with Article 2(1a), (1b), and (1c), respectively. For an economic activity considered material with respect to a KPI (turnover, CapEx, or OpEx), undertakings shall assess the Taxonomy-eligibility and alignment of that KPI pertaining to that activity in its entirety and not consider portion of that KPI pertaining to that activity as non-material. Column (14) shall not include any portion of turnover, CapEx, or OpEx associated with material economic activities.
- Column (16) shall contain the proportion of the denominator of the respective KPI, pertaining to the financial year (N-1), that is associated with total Taxonomy-aligned economic activities pertaining to the financial year (N-1).
- Columns (5) to (11) to avoid double counting: if the figure in column (5) contains Taxonomy-aligned economic activities that contribute substantially to more than one environmental objective at the same time, the substantial contribution of those economic activities to multiple environmental objectives should be indicated under the respective environmental objectives in columns (6) to (11) of Template 2 on respective activity rows, but should not be double counted in columns (5) to (11) of Template 1.

## Template 2: Proportion of turnover from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities - disclosure covering year 2025 (activity breakdown)

Reported KPI Turnover													
Financial year 2025													
Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy- eligible Turnover)	Taxonomy- aligned KPI (monetary value of Turnover)	Taxonomy-aligned KPI (Proportion of Taxonomy- aligned Turnover)	Environmental objective of Taxonomy-aligned activities						Enabling activity	Transitional activity	Proportion of Taxonomy- aligned activities in Taxonomy- eligible
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Text		%	€ M	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Data processing, hosting and related activities	CCM 8.1.	0.4	-	-	-	-	-	-	-	-	-	T	-
<b>Sum of alignment per objective</b>					-	-	-	-	-	-			
<b>Total KPI Turnover</b>		<b>0.4</b>	-	-	-	-	-	-	-	-	-	-	-

### Explanatory notes for Template 2:

1. Non-financial undertakings shall duplicate this template to disclose separately the turnover, the CapEx and the OpEx KPIs, clearly indicating in the title of each table which KPI the table refers to. Where non-financial undertakings disclose zero Taxonomy-eligible KPI (turnover, CapEx, or OpEx, respectively), in Template 1, column (3), they may omit disclosing Template 2 for that KPI.
2. (N) Indicate the financial year that the reported data refers to. Columns (2) to (14) pertain to financial year (N).
3. For activity rows, column (2): The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective, i.e.: Climate Change Mitigation: CCM, Climate Change Adaptation: CCA, Water and Marine Resources: WTR, Circular Economy: CE, Pollution Prevention and Control: PPC, Biodiversity and ecosystems: BIO. For example, the Activity ""Afforestation"" has the Code: CCM 1.1. Where activities are eligible to make a substantial contribution to more than one objective, the codes for all objectives should be indicated.
4. For activity rows, column (3) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-eligible economic activity regardless of whether or not that activity is Taxonomy-aligned, or only a portion of that activity is Taxonomy-aligned.
5. For activity rows, column (5) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-aligned economic activity, or with the Taxonomy-aligned portion of a Taxonomy-eligible activity.
6. For activity rows, columns (6) to (11) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-aligned economic activity, or its portion, that contributes substantially to the respective environmental objective for which the economic activity is Taxonomy-eligible. Columns corresponding to the environmental objectives for which the economic activity is not Taxonomy-eligible should be left empty. Where a Taxonomy-aligned economic activity, or its portion, contributes substantially to several environmental objectives, the columns under those environmental objectives shall contain the corresponding proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with that activity or its portion. In other words, where an activity contributes substantially to more than one environmental objective at the same time, its substantial contribution should be indicated under multiple environmental objectives in the row pertaining to that economic activity.
7. Column (14) shall contain the ratio of the figure in column (5) divided by the figure in column (3) in the respective rows.
8. Row ""Sum of alignment per objective"": columns (6) to (11) shall contain the sum of figures for all reported activities under the respective columns. The sum of columns (6) to (11) on this row might possibly result in more than 100%.
9. Row ""Total KPI"": columns (3) to (13) shall contain the sum of figures for all reported activities under the respective columns. For columns (4) to (11), when performing the summation in the row ""Total KPI"", non-financial undertakings shall not double count the contributions to multiple environmental objectives and include only the environmental objective they deem the most relevant. Figure in column (5) in this row, i.e. Total Taxonomy-aligned KPI, shall equal the sum of figures reported in columns (6) to (11) in this row. The figures reported in the row ""Total KPI"" in columns (3) to (13) in Template 2 shall equal to the figures reported in corresponding columns (3) to (13) in the Template 1. In order to avoid double counting, financial undertakings will take into account the Total KPI figure as reported in Template 1 when computing their own KPIs.

## Template 2: Proportion of CapEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities — disclosure covering year 2025 (activity breakdown)

Reported KPI CapEx													
Financial year 2025													
Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy-eligible CapEx)	Taxonomy- aligned KPI (monetary value of CapEx)	Taxonomy-aligned KPI (Proportion of Taxonomy- aligned CapEx)	Environmental objective of Taxonomy-aligned activities						Enabling activity	Transitional activity	Proportion of Taxonomy-aligned activities in Taxonomy-eligible
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Text		%	€ M	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Operation of personal mobility devices, cycle logistics	CCM 6.4.	0.1	-	-	-	-	-	-	-	-	-	-	-
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5.	3.2	-	-	-	-	-	-	-	-	-	T	-
Data processing, hosting and related activities	CCM 8.1.	6.1	-	-	-	-	-	-	-	-	-	T	-
<b>Sum of alignment per objective</b>					-	-	-	-	-	-	-	T	-
<b>Total KPI CapEx</b>		<b>9.4</b>	-	-	-	-	-	-	-	-	-	-	-

### Explanatory notes for Template 2:

1. Non-financial undertakings shall duplicate this template to disclose separately the turnover, the CapEx and the OpEx KPIs, clearly indicating in the title of each table which KPI the table refers to. Where non-financial undertakings disclose zero Taxonomy-eligible KPI (turnover, CapEx, or OpEx, respectively), in Template 1, column (3), they may omit disclosing Template 2 for that KPI.
2. (N) Indicate the financial year that the reported data refers to. Columns (2) to (14) pertain to financial year (N).
3. For activity rows, column (2): The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective, i.e.: Climate Change Mitigation: CCM, Climate Change Adaptation: CCA, Water and Marine Resources: WTR, Circular Economy: CE, Pollution Prevention and Control: PPC, Biodiversity and ecosystems: BIO. For example, the Activity "Afforestation" has the Code: CCM 1.1. Where activities are eligible to make a substantial contribution to more than one objective, the codes for all objectives should be indicated.
4. For activity rows, column (3) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-eligible economic activity regardless of whether or not that activity is Taxonomy-aligned, or only a portion of that activity is Taxonomy-aligned.
5. For activity rows, column (5) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-aligned economic activity, or with the Taxonomy-aligned portion of a Taxonomy-eligible activity.
6. For activity rows, columns (6) to (11) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-aligned economic activity, or its portion, that contributes substantially to the respective environmental objective for which the economic activity is Taxonomy-eligible. Columns corresponding to the environmental objectives for which the economic activity is not Taxonomy-eligible should be left empty. Where a Taxonomy-aligned economic activity, or its portion, contributes substantially to several environmental objectives, the columns under those environmental objectives shall contain the corresponding proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with that activity or its portion. In other words, where an activity contributes substantially to more than one environmental objective at the same time, its substantial contribution should be indicated under multiple environmental objectives in the row pertaining to that economic activity.
7. Column (14) shall contain the ratio of the figure in column (5) divided by the figure in column (3) in the respective rows.
8. Row "Sum of alignment per objective": columns (6) to (11) shall contain the sum of figures for all reported activities under the respective columns. The sum of columns (6) to (11) on this row might possibly result in more than 100%.
9. Row "Total KPI": columns (3) to (13) shall contain the sum of figures for all reported activities under the respective columns. For columns (4) to (11), when performing the summation in the row "Total KPI", non-financial undertakings shall not double count the contributions to multiple environmental objectives and include only the environmental objective they deem the most relevant. Figure in column (5) in this row, i.e. Total Taxonomy-aligned KPI, shall equal the sum of figures reported in columns (6) to (11) in this row. The figures reported in the row "Total KPI" in columns (3) to (13) in Template 2 shall equal to the figures reported in corresponding columns (3) to (13) in the Template 1. In order to avoid double counting, financial undertakings will take into account the Total KPI figure as reported in Template 1 when computing their own KPIs.

## Template 2: Proportion of OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities — disclosure covering year 2025 (activity breakdown)

Reported KPI OpEx													
Financial year 2025													
Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy-eligible OpEx)	Taxonomy-aligned KPI (monetary value of OpEx)	Taxonomy-aligned KPI (Proportion of Taxonomy-aligned OpEx)	Environmental objective of Taxonomy-aligned activities						Enabling activity	Transitional activity	Proportion of Taxonomy-aligned activities in Taxonomy-eligible
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
<i>Text</i>		%	€ M	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Operation of personal mobility devices, cycle logistics	CCM 6.4.	0.6	-	-	-	-	-	-	-	-	-	-	-
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5.	1.0	-	-	-	-	-	-	-	-	-	T	-
Data processing, hosting and related activities	CCM 8.1.	17.7	-	-	-	-	-	-	-	-	-	T	-
<b>Sum of alignment per objective</b>					-	-	-	-	-	-			
<b>Total KPI OpEx</b>		<b>19.2</b>	-	-	-	-	-	-	-	-	-	-	-

Explanatory notes for Template 2:

1. Non-financial undertakings shall duplicate this template to disclose separately the turnover, the CapEx and the OpEx KPIs, clearly indicating in the title of each table which KPI the table refers to. Where non-financial undertakings disclose zero Taxonomy-eligible KPI (turnover, CapEx, or OpEx, respectively), in Template 1, column (3), they may omit disclosing Template 2 for that KPI.
2. (N) Indicate the financial year that the reported data refers to. Columns (2) to (14) pertain to financial year (N).
3. For activity rows, column (2): The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective, i.e.: Climate Change Mitigation: CCM, Climate Change Adaptation: CCA, Water and Marine Resources: WTR, Circular Economy: CE, Pollution Prevention and Control: PPC, Biodiversity and ecosystems: BIO. For example, the Activity "Afforestation" has the Code: CCM 1.1. Where activities are eligible to make a substantial contribution to more than one objective, the codes for all objectives should be indicated.
4. For activity rows, column (3) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-eligible economic activity regardless of whether or not that activity is Taxonomy-aligned, or only a portion of that activity is Taxonomy-aligned.
5. For activity rows, column (5) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-aligned economic activity, or with the Taxonomy-aligned portion of a Taxonomy-eligible activity.
6. For activity rows, columns (6) to (11) shall contain the proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with a Taxonomy-aligned economic activity, or its portion, that contributes substantially to the respective environmental objective for which the economic activity is Taxonomy-eligible. Columns corresponding to the environmental objectives for which the economic activity is not Taxonomy-eligible should be left empty. Where a Taxonomy-aligned economic activity, or its portion, contributes substantially to several environmental objectives, the columns under those environmental objectives shall contain the corresponding proportion of the denominator of the respective KPI, as reported in Template 1, that is associated with that activity or its portion. In other words, where an activity contributes substantially to more than one environmental objective at the same time, its substantial contribution should be indicated under multiple environmental objectives in the row pertaining to that economic activity.
7. Column (14) shall contain the ratio of the figure in column (5) divided by the figure in column (3) in the respective rows.
8. Row "Sum of alignment per objective": columns (6) to (11) shall contain the sum of figures for all reported activities under the respective columns. The sum of columns (6) to (11) on this row might possibly result in more than 100%.
9. Row "Total KPI": columns (3) to (13) shall contain the sum of figures for all reported activities under the respective columns. For columns (4) to (11), when performing the summation in the row "Total KPI", non-financial undertakings shall not double count the contributions to multiple environmental objectives and include only the environmental objective they deem the most relevant. Figure in column (5) in this row, i.e. Total Taxonomy-aligned KPI, shall equal the sum of figures reported in columns (6) to (11) in this row. The figures reported in the row "Total KPI" in columns (3) to (13) in Template 2 shall equal to the figures reported in corresponding columns (3) to (13) in the Template 1. In order to avoid double counting, financial undertakings will take into account the Total KPI figure as reported in Template 1 when computing their own KPIs

**Background information on voluntary reporting as a credit institution in accordance with the EU Taxonomy FAQ of December 20, 2021, Question 4, and Annex XI of (EU) 2021/2178 and (EU) 2026/73**

In the financial year 2025 it is the first time flatexDEGIRO SE voluntarily discloses EU Taxonomy KPIs as a credit institution. Our objective is to provide a more representative picture of our core activities as a broker, which are currently not adequately captured by the EU Taxonomy reporting as a non-financial company. The KPIs are consolidated in accordance with regulatory requirements based on the regulatory consolidation scope. Furthermore, the reporting obligation for financial companies (FinRep), supplemented by taxonomy-specific information, forms the basis of the data for the calculations.

In line with the voluntary disclosure requirements set out in Question 4 of the 20 December 2021 FAQs, this EU Taxonomy reporting section is presented separately from the mandatory disclosures required under Article 8 of the EU Taxonomy Regulation. The new reporting templates have been applied in accordance with Annex VI of (EU) 2026/73, as well as the associated methodology, including the materiality assessment. For the flatexDEGIRO Group, the KPIs for credit institutions (templates 0–4) have been published, specifically the Green Asset Ratio (GAR) KPIs for turnover and capital expenditure. Reporting template 5 for the flatexDEGIRO business model is classified as non-material or outside the scope of the business model. The Reporting templates will only be reported starting from the 2027 financial year under the new Delegated Act. The materiality analysis pursuant to the new Delegated Act applies to credit institutions in two ways:

- a) At the asset level, if the use of proceeds is known ((EU) 2026/73 Art. 1 (3) 1a-e)
- b) KPI level (e.g., assets under management and financial guarantees) ((EU) 2026/73 Art. 1(3) 1f)

Under (a), credit institutions may avoid an EU Taxonomy assessment of individual assets if the cumulative value of certain assets for which the use of proceeds is known is less than 10% of the total assets with known purpose within the KPI. For the flatexDEGIRO Group, the application of this materiality assessment is not necessary in the financial year 2025, as there is no financing for activities with use of proceeds known that fall under the EU Taxonomy requirements.

Under b), credit institutions may be exempted from reporting certain KPIs if the cumulative value of net turnover

generated by that KPI is less than 10% of the credit institution's total net turnover. This applies to us for the KPIs "financial guarantees" and "assets under management" (Reporting Template 5); specifically, the flatexDEGIRO Group does have any corresponding risk positions for these financial instruments.

For nuclear and gas activities the materiality analysis in accordance with the draft FAQ of July 4, 2025 – Question 9 and the introductory explanations of (EU) 2026/73, paragraph 13 is applied. As we do not finance any nuclear or gas projects, these activities are considered non-material and are not reported in Reporting Template 2 for credit institutions.

Due to the brokerage-based nature of the business model, a significant portion of the loan portfolio consists of Lombard loans. These are granted to retail customers, the use of proceeds is not known, and the activities are neither taxonomy-eligible nor taxonomy-aligned, as they cannot be attributed to any taxonomy-relevant economic activity. The new Delegated Act (EU) 2026/73 clarifies that assets that are not taxonomy-eligible should not distort the GAR calculation, and that the GAR numerator and denominator should be harmonized. In accordance with the updated regulatory requirements (harmonization of the GAR numerator and denominator), Lombard loans are thus excluded from the GAR calculation (denominator and numerator) and reported in Reporting Template 1 under "Other Assets."

**Calculation of Taxonomy KPIs as a Credit Institution**

In financial year 2025, the Green Asset Ratio (GAR) for the main KPI amounts to 1.59% for turnover and 1.78% for CapEx. The taxonomy-eligible share of assets corresponds to 15.19% in the turnover KPI and 16.27% in the CapEx KPI. These ratios result primarily from the bank's treasury operations, in particular from debt securities in business relationships with NFRD/CSRD counterparties based on the published KPIs. The majority of flatexDEGIRO's counterparties are counterparties that are not subject to the CSRD/NFRD requirements or are not permitted to be included in the GAR and therefore do not report EU Taxonomy information. The issue of data availability will become even more acute in the future due to the higher CSRD size thresholds and the adjustments resulting from the "Omnibus" regulatory initiative. Due to the lack of taxonomy data from non-NFRD/CSRD companies, flatexDEGIRO has chosen not to include these companies voluntarily (e.g. line 19 in Reporting Template 1).

Further, flatexDEGIRO does not engage in traditional lending activities, but rather performs within the scope of its core activity as a broker; therefore, also the retail client portfolio is not covered by relevant EU Taxonomy activities. Thus, the financing of taxonomy-aligned activities in the corporate client portfolio currently plays a minor role in the context of business operations and strategy. Accordingly, the EU Taxonomy is not currently relevant to product design processes or collaboration with clients.

As the EU Taxonomy KPIs for credit institutions are reported in the financial year 2025 for the first time on a voluntary basis, no data of previous years is disclosed. In subsequent years, a corresponding year-over-year comparison and associated classifications will be reported.

In the columns for “non-assessed exposures” no corresponding metrics are reported in the financial year 2025. Materiality assessments in the context of column “p” in Reporting Template 1 do not apply to the flatexDEGIRO Group in this financial year. Further, to the first-time application of “Omnibus” for the financial 2025, it is not possible to disclose counterparties using the opt-out option for financial companies (column o) or counterparties applying materiality considerations (column n) for the current reporting period (reporting data basis). Furthermore, Reporting Template 2 “GAR Sector Information” captures only those risk positions that fall within the scope of the EU Taxonomy. If the number of risk positions covered by the EU Taxonomy in the banking book is less than ten, only these risk positions are included in Reporting Template 2.

**Template 0: Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation**

Disclosure reference date/period 2025		Total exposure to Taxonomy-aligned activities (million EUR)		KPI <sup>(1)</sup> (%)	KPI <sup>(2)</sup> (%)	% coverage (over total assets) <sup>(3)</sup> (%)	Non-assessed exposures (% of covered assets) <sup>(4)</sup> (%)	Non-assessed exposures (% of covered assets) <sup>(4)</sup> (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
<b>Main KPI</b>	<b>Green asset ratio (GAR) stock</b>	9.74	10.86	1.59	1.78	8.21		

		Total exposure to Taxonomy-aligned activities (million EUR)		KPI <sup>(1)</sup> (%)	KPI <sup>(2)</sup> (%)	% coverage (over total assets) <sup>(3)</sup> (%)	Non-assessed exposures (% of covered assets) <sup>(4)</sup> (%)	Non-assessed exposures (% of covered assets) <sup>(4)</sup> (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
<i>Additional KPIs</i>	<i>GAR (flow)</i>	7.52	8.56	1.34	1.52	25.85		
	<i>Trading book</i>							
	<i>Financial guarantees</i>							
	<i>Assets under management</i>							
	<i>Fees and commissions income<sup>(5)</sup></i>							

(1) Based on the Turnover KPI of the counterparty.

(2) Based on the CapEx KPI of the counterparty.

(3) % of assets covered by the KPI over banks' total assets.

(4) In accordance with Article 7(8) of Regulation (EU) 2026/73

(5) Fee and commission income from services other than lending and AuM.

Note 1: Across the reporting templates: cells shaded in black should not be reported.

Note 2: Fee and Commission (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2028.

## Template 1: Assets for the calculation of GAR - Stock Turnover

Disclosure reference date/period 2025		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Stock Million EUR	Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counter-parties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)								
1	<b><u>GAR - Covered assets in both numerator and denominator</u></b>																
2	<b>Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>	611.50	92.89	9.74	9.72	0.01	0.00	0.00	0.00	0.00		0.28	0.82				
3	<b>Financial undertakings</b>	611.50	92.89	9.74	9.72	0.01	0.00	0.00	0.00	0.00		0.28	0.82				
4	Loans and advances	25.34	2.91	0.26	0.26	0.00	0.00	0.00	0.00	0.00		0.07	0.03				
5	Debt securities, including UoP	586.16	89.98	9.48	9.47	0.01	0.00	0.00	0.00	0.00		0.21	0.79				
6	Equity instruments																
7	<b>Non-financial undertakings</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00				
8	Loans and advances	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00				
9	Debt securities, including UoP																
10	Equity instruments																
11	<b>Households</b>																
12	of which loans collateralised by residential immovable property																
13	of which building renovation loans																
14	of which motor vehicle loans																
15	<b>Local governments financing</b>																
16	Housing financing																
17	Other local government financing																

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Disclosure reference date/period 2025																	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counter-parties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)							
18	Stock Million EUR																
	Collateral obtained by taking possession: residential and commercial immovable properties																
19	Exposures included on a voluntary basis <sup>(3)</sup>																
20	<b>Total GAR assets</b>	611.50															
21	<b>Assets not covered for GAR calculation</b>	6,836.68															
22	Central governments and Supranational issuers	296.08															
23	Central banks exposure	4,247.60															
24	Trading book																
25	Undertakings and entities not subject to CSRD	322.89															
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	321.68															
27	Loans and advances	114.68															
28	of which loans collateralised by commercial immovable property																
29	of which building renovation loans																
30	Debt securities	121.16															
31	Equity instruments	85.84															
32	Non-EU country counterparties not subject to CSRD disclosure obligations	1.21															
33	Loans and advances	1.21															
34	Debt securities																
35	Equity instruments																
36	Derivatives																
37	On demand interbank loans	190.53															
38	Cash and cash-related assets	0.02															
39	Other categories of assets (e.g. Goodwill, commodities etc.)	1,779.56															

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Disclosure reference date/period 2025																	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective					Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counter-parties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>	
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution								Biodiversity and Ecosystems (BIO)
40	Stock Million EUR	7,448.18															
	<b>Total assets</b>																
<b>Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments</b>																	
41	Financial guarantees																
42	Assets under management																
43	Of which debt securities																
44	Of which equity instruments																

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

## Explanatory notes:

- The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.
- Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

## Template 1: Assets for the calculation of GAR - Stock - CapEx

Disclosure reference date/period 2025		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Stock Million EUR		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)							
1	<b>GAR - Covered assets in both numerator and denominator</b>																
2	<b>Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>	611.50	99.48	10.86	10.83	0.03	0.00	0.00	0.00	0.00		0.34	1.22				
3	<b>Financial undertakings</b>	611.50	99.48	10.86	10.83	0.03	0.00	0.00	0.00	0.00		0.34	1.22				
4	Loans and advances	25.34	8.19	0.33	0.33	0.00	0.00	0.00	0.00	0.00		0.08	0.05				
5	Debt securities, including UoP	586.16	91.29	10.53	10.50	0.03	0.00	0.00	0.00	0.00		0.26	1.17				
6	Equity instruments																
7	<b>Non-financial undertakings</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00				
8	Loans and advances	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00				
9	Debt securities, including UoP																
10	Equity instruments																
11	<b>Households</b>																
12	of which loans collateralised by residential immovable property																
13	of which building renovation loans																
14	of which motor vehicle loans																
15	<b>Local governments financing</b>																
16	Housing financing																
17	Other local government financing																
18	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>																
19	<b>Exposures included on a voluntary basis <sup>(3)</sup></b>																
20	<b>Total GAR assets</b>	611.50															

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Disclosure reference date/period 2025																	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective					Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>	
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution								Biodiversity and Ecosystems (BIO)
21	Stock Million EUR	6,836.68															
	<b>Assets not covered for GAR calculation</b>																
22	Central governments and Supranational issuers	296.08															
23	Central banks exposure	4,247.60															
24	Trading book																
25	Undertakings and entities not subject to CSRD	322.89															
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	321.68															
27	Loans and advances	114.68															
28	of which loans collateralised by commercial immovable property																
29	of which building renovation loans																
30	Debt securities	121.16															
31	Equity instruments	85.84															
32	Non-EU country counterparties not subject to CSRD disclosure obligations	1.21															
33	Loans and advances	1.21															
34	Debt securities																
35	Equity instruments																
36	Derivatives																
37	On demand interbank loans	190.53															
38	Cash and cash-related assets	0.02															

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Disclosure reference date/period 2025																	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective					Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>	
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution								Biodiversity and Ecosystems (BIO)
	Stock Million EUR																
39	Other categories of assets (e.g. Goodwill, commodities etc.)	1,779.56															
40	<b>Total assets</b>	<b>7,448.18</b>															
<b>Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments</b>																	
41	Financial guarantees																
42	Assets under management																
43	Of which debt securities																
44	Of which equity instruments																

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

## Explanatory notes:

- The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.
- Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

## Template 1: Assets for the calculation of GAR - Flow - Turnover

Disclosure reference date/period 2025																		
Flow Million EUR	Total (gross) carrying amount	Of which Taxonomy- eligible	Of which Taxonomy- aligned	Breakdown per environmental objective										Non- assessed exposures	Of which financing non- material activities of counter- parties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non- material by the credit institution <sup>(2)</sup>	
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)	Of which Use of Proceeds	Of which transitional	Of which enabling						
				a	b	c	d	e	f	g	h	i	j					k
1	<b>GAR - Covered assets in both numerator and denominator</b>																	
2	<b>Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>	562.35	75.26	7.52	7.50	0.01	0.00	0.00	0.00	0.00			0.26	0.80				
3	<b>Financial undertakings</b>	562.35	75.26	7.52	7.50	0.01	0.00	0.00	0.00	0.00			0.26	0.80				
4	Loans and advances	24.33	2.42	0.21	0.20	0.00	0.00	0.00	0.00	0.00			0.07	0.03				
5	Debt securities, including UoP	538.02	72.84	7.31	7.30	0.01	0.00	0.00	0.00	0.00			0.19	0.78				
6	Equity instruments																	
7	<b>Non-financial undertakings</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00	0.00				
8	Loans and advances	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00	0.00				
9	Debt securities, including UoP																	
10	Equity instruments																	
11	<b>Households</b>																	
12	of which loans collateralised by residential immovable property																	
13	of which building renovation loans																	
14	of which motor vehicle loans																	
15	<b>Local governments financing</b>																	
16	Housing financing																	
17	Other local government financing																	

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Disclosure reference date/period 2025																	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Flow Million EUR		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)							
18	Collateral obtained by taking possession: residential and commercial immovable properties																
19	Exposures included on a voluntary basis <sup>(3)</sup>																
20	<b>Total GAR assets</b>	<b>562.35</b>															
21	<b>Assets not covered for GAR calculation</b>	1,612.89															
22	Central governments and Supranational issuers	104.26															
23	Central banks exposure	1,153.97															
24	Trading book																
25	Undertakings and entities not subject to CSRD	208.67															
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	207.50															
27	Loans and advances	85.48															
28	of which loans collateralised by commercial immovable property																
29	of which building renovation loans																
30	Debt securities	121.16															
31	Equity instruments	0.86															
32	Non-EU country counterparties not subject to CSRD disclosure obligations	1.18															
33	Loans and advances	1.18															
34	Debt securities																
35	Equity instruments																
36	<b>Derivatives</b>																
37	<b>On demand interbank loans</b>	0.00															
38	<b>Cash and cash-related assets</b>	0.00															

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Disclosure reference date/period 2025																	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Flow Million EUR		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
Other categories of assets (e.g. Goodwill, commodities etc.)					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)							
39		145,99															
40	<b>Total assets</b>	2,175.24															
<b>Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments</b>																	
41	Financial guarantees																
42	Assets under management																
43	Of which debt securities																
44	Of which equity instruments																

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

## Explanatory notes:

- The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.
- Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

## Template 1: Assets for the calculation of GAR - Flow - CapEx

Disclosure reference date/period 2025		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	
Flow Million EUR		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)								
1	<b>GAR - Covered assets in both numerator and denominator</b>																	
2	<b>Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>																	
		562.35	81.58	8.56	8.53	0.03	0.00	0.00	0.00	0.00		0.32	1.19					
3	<b>Financial undertakings</b>	562.35	81.58	8.56	8.53	0.03	0.00	0.00	0.00	0.00		0.32	1.19					
4	Loans and advances	24.33	7.46	0.24	0.24	0.00	0.00	0.00	0.00	0.00		0.07	0.04					
5	Debt securities, including UoP	538.02	74.12	8.32	8.29	0.03	0.00	0.00	0.00	0.00		0.25	1.15					
6	Equity instruments																	
7	<b>Non-financial undertakings</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00					
8	Loans and advances	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00					
9	Debt securities, including UoP																	
10	Equity instruments																	
11	<b>Households</b>																	
12	of which loans collateralised by residential immovable property																	
13	of which building renovation loans																	
14	of which motor vehicle loans																	
15	<b>Local governments financing</b>																	
16	Housing financing																	
17	Other local government financing																	
18	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>																	

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Disclosure reference date/period 2025																	
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	
	Flow Million EUR	Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)								
19	Exposures included on a voluntary basis <sup>(3)</sup>																
20	<b>Total GAR assets</b>	<b>562.35</b>															
21	<b>Assets not covered for GAR calculation</b>	1,612.89															
22	Central governments and Supranational issuers	104.26															
23	Central banks exposure	1,153.97															
24	Trading book																
25	Undertakings and entities not subject to CSRD	208.67															
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	207.50															
27	Loans and advances	85.48															
28	of which loans collateralised by commercial immovable property																
29	of which building renovation loans																
30	Debt securities	121.16															
31	Equity instruments	0.86															
32	Non-EU country counterparties not subject to CSRD disclosure obligations	1.18															
33	Loans and advances	1.18															
34	Debt securities																
35	Equity instruments																
36	Derivatives	-															
37	On demand interbank loans	-															
38	Cash and cash-related assets	0.00															
39	Other categories of assets (e.g. Goodwill, commodities etc.)	145.99															
40	<b>Total assets</b>	<b>2,175.24</b>															

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Disclosure reference date/period 2025																	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Flow Million EUR		Total (gross) carrying amount	Of which Taxonomy-eligible	Of which Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures	Of which financing non-material activities of counterparties <sup>(1)</sup>	Of which financing counterparties in accordance with Article 7(9)	Of which not assessed considered non-material by the credit institution <sup>(2)</sup>
					Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and Marine resources (WTR)	Circular Economy (CE)	Pollution	Biodiversity and Ecosystems (BIO)							
<b>Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments</b>																	
41	Financial guarantees																
42	Assets under management																
43	Of which debt securities																
44	Of which equity instruments																

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

1. The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.

2. Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.

3. Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

## Template 2: GAR sector information - Turnover

Disclosure reference date/period 2025									
a	b	c	d	e	f	g	h	i	j
Breakdown by sector - NACE 4 digits level (code and label) (Million EUR)	Total [Gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1 L64.19-Other monetary intermediation	587.08	90.44	9.53	9.52	0.01	0.00	0.00	0.00	0.00
2 L64.92-Other credit granting	23.71	2.30	0.20	0.19	0.00	0.00	0.00	0.00	0.00
3 L66-Activities auxiliary to financial services and insurance activities	0.71	0.14	0.02	0.01	0.00	0.00	0.00	0.00	0.00
4 C27.20-Manufacture of batteries and accumulators	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 C20.41-Manufacture of soap and detergents, cleaning and polishing preparations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 Nuclear activities <sup>(1)</sup>									
12 Fossil gas activities <sup>(2)</sup>									
13 Of which non-assessed exposures <sup>(3)</sup>									

(1) referred to in Sections 4.26, 4.27, and 4.28 of Annexes I and II to Delegated Regulation 2021/2139

(2) referred to in Sections 4.29, 4.30, and 4.31 of Annexes I and II to Delegated Regulation 2021/2139

(3) In accordance with Article 7 (3) of Regulation (EU) 2026/73

1. Credit institutions shall disclose in this template information on top ten exposures in the banking book towards top ten sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

2. The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.

3. Credit institutions shall duplicate this template for turnover based and CapEx based disclosures.

## Template 2: GAR sector information - CapEx

Disclosure reference date/period 2025									
a	b	c	d	e	f	g	h	i	j
Breakdown by sector - NACE 4 digits level (code and label) (Million EUR)	Total [Gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1 L64.19-Other monetary intermediation	587.08	91.99	10.62	10.59	0.03	0.00	0.00	0.00	0.00
2 L64.92-Other credit granting	23.71	7.34	0.22	0.22	0.00	0.00	0.00	0.00	0.00
3 L66-Activities auxiliary to financial services and insurance activities	0.71	0.15	0.02	0.02	0.00	0.00	0.00	0.00	0.00
4 C27.20-Manufacture of batteries and accumulators	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 C20.41-Manufacture of soap and detergents, cleaning and polishing preparations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 Nuclear activities <sup>(1)</sup>									
12 Fossil gas activities <sup>(2)</sup>									
13 Of which non-assessed exposures <sup>(3)</sup>									

(1) referred to in Sections 4.26, 4.27, and 4.28 of Annexes I and II to Delegated Regulation 2021/2139

(2) referred to in Sections 4.29, 4.30, and 4.31 of Annexes I and II to Delegated Regulation 2021/2139

(3) In accordance with Article 7 (3) of Regulation (EU) 2026/73

1. Credit institutions shall disclose in this template information on top ten exposures in the banking book towards top ten sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

2. The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.

3. Credit institutions shall duplicate this template for turnover based and CapEx based disclosures.

## Template 3: GAR KPI stock - Turnover

Disclosure reference date/period 2025															
	% (compared to corresponding total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	
		Taxonomy-eligible	Taxonomy aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures <sup>(1)</sup>
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)						
1	<b>GAR - Covered assets in both numerator and denominator</b>														
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	15.19	1.59	1.59	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.13	10.48		
3	<b>Financial undertakings</b>	15.19	1.59	1.59	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.13	10.48		
4	Loans and advances	11.47	1.03	1.02	0.01	0.00	0.00	0.00	0.00	0.00	0.29	0.11	8.96		
5	Debt securities, including UoP	15.35	1.62	1.61	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.14	10.53		
6	Equity instruments														
7	<b>Non-financial undertakings</b>	80.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
8	Loans and advances	80.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
9	Debt securities, including UoP														
10	Equity instruments														
11	<b>Households</b>														
12	of which loans collateralised by residential immovable property														
13	of which building renovation loans														
14	of which motor vehicle loans														
15	<b>Local governments financing</b>														
16	Housing financing														
17	Other local government financing														
18	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>														
19	Exposures included on a voluntary basis <sup>(2)</sup>														
20	<b>GAR - Total GAR assets</b>	15.19	1.59	1.59	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.13	10.48		

(1) In accordance with Article 7 (8) of Regulation (EU) 2026/73

(2) In accordance with Article 7 (3) of Regulation (EU) 2026/73

1. Institution shall disclose in this template the GAR KPIs on stock of exposures calculated based on the data disclosed in template 1, on covered assets.
2. Credit institutions shall duplicate this template for turnover based and CapEx based disclosures

## Template 3: GAR KPI stock – CapEx

	Disclosure reference date/period 2025	a	b	c	d	e	f	g	h	i	j	k	l	m														
															Taxonomy-eligible	Taxonomy aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
																	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)						
1	<b>GAR - Covered assets in both numerator and denominator</b>																											
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	16.27	1.78	1.77	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.20	10.92															
3	<b>Financial undertakings</b>	16.27	1.78	1.77	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.20	10.92															
4	Loans and advances	32.32	1.30	1.29	0.01	0.00	0.00	0.00	0.00	0.00	0.31	0.18	4.01															
5	Debt securities, including UoP	15.57	1.80	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.20	11.54															
6	Equity instruments																											
7	<b>Non-financial undertakings</b>	65.19	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.02															
8	Loans and advances	65.19	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.02															
9	Debt securities, including UoP																											
10	Equity instruments																											
11	<b>Households</b>																											
12	of which loans collateralised by residential immovable property																											
13	of which building renovation loans																											
14	of which motor vehicle loans																											
15	<b>Local governments financing</b>																											
16	Housing financing																											
17	Other local government financing																											
18	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>																											

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	Disclosure reference date/period 2025														
		a	b	c	d	e	f	g	h	i	j	k	l	m	
		Taxonomy-eligible	Taxonomy aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
	% (compared to corresponding total covered assets in the denominator)			Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)						
19	<b>Exposures included on a voluntary basis (2)</b>														
20	<b>GAR - Total GAR assets</b>	16.27	1.78	1.77	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.20	10.92		

(1) In accordance with Article 7 (8) of Regulation (EU) 2026/73

(2) In accordance with Article 7 (3) of Regulation (EU) 2026/73

1. Institution shall disclose in this template the GAR KPIs on stock of exposures calculated based on the data disclosed in template 1, on covered assets.

2. Credit institutions shall duplicate this template for turnover based and CapEx based disclosures.

## Template 4: GAR KPI flow - Turnover

	Disclosure reference /period 2025	a	b	c	d	e	f	g	h	i	j	k	l	m														
															Taxonomy-eligible	Taxonomy aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
																	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)						
1	<b>GAR - Covered assets in both numerator and denominator</b>																											
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	13.38	1.34	1.33	0.00	0.00	0.00	0.00	0.00		0.05	0.14	9.99															
3	<b>Financial undertakings</b>	13.38	1.34	1.33	0.00	0.00	0.00	0.00	0.00		0.05	0.14	9.99															
4	Loans and advances	9.94	0.85	0.84	0.01	0.00	0.00	0.00	0.00		0.30	0.10	8.52															
5	Debt securities, including UoP	13.54	1.36	1.36	0.00	0.00	0.00	0.00	0.00		0.04	0.14	10.04															
6	Equity instruments																											
7	<b>Non-financial undertakings</b>	81.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00															
8	Loans and advances	81.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00															
9	Debt securities, including UoP																											
10	Equity instruments																											
11	<b>Households</b>																											
12	of which loans collateralised by residential immovable property of which building renovation loans																											
13	of which motor vehicle loans																											
14																												
15	<b>Local governments financing</b>																											
16	Housing financing																											
17	Other local government financing																											
18	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>																											
19	<b>Exposures included on a voluntary basis (2)</b>																											
20	<b>GAR - Total GAR assets</b>	13.38	1.34	1.33	0.00	0.00	0.00	0.00	0.00		0.05	0.14	9.99															

(1) In accordance with Article 7 (8) of Regulation (EU) 2026/73

(2) In accordance with Article 7 (3) of Regulation (EU) 2026/73

1. Institution shall disclose in this template the GAR KPIs on flow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date calculated based on the data disclosed in template 1, on covered assets.
2. Credit institutions shall duplicate this template for turnover based and CapEx based disclosures

## Template 4: GAR KPI flow -CapEx

	Disclosure reference date /period 2025	a	b	c	d	e	f	g	h	i	j	k	l	m														
															Taxonomy-eligible	Taxonomy aligned	Breakdown per environmental objective							Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
																	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)						
1	<b>GAR - Covered assets in both numerator and denominator</b>																											
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	14.51	1.52	1.52	0.00	0.00	0.00	0.00	0.00		0.06	0.21	10.50															
3	<b>Financial undertakings</b>	14.51	1.52	1.52	0.00	0.00	0.00	0.00	0.00		0.06	0.21	10.50															
4	Loans and advances	30.67	0.98	0.97	0.01	0.00	0.00	0.00	0.00		0.31	0.17	3.20															
5	Debt securities, including UoP	13.78	1.55	1.54	0.00	0.00	0.00	0.00	0.00		0.05	0.21	11.23															
6	Equity instruments																											
7	<b>Non-financial undertakings</b>	65.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00															
8	Loans and advances	65.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00															
9	Debt securities, including UoP																											
10	Equity instruments																											
11	<b>Households</b>																											
12	of which loans collateralised by residential immovable property																											
13	of which building renovation loans																											
14	of which motor vehicle loans																											
15	<b>Local governments financing</b>																											
16	Housing financing																											
17	Other local government financing																											
18	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>																											
19	<b>Exposures included on a voluntary basis (2)</b>																											
20	<b>GAR - Total GAR assets</b>	14.51	1.52	1.52	0.00	0.00	0.00	0.00	0.00		0.06	0.21	10.50															

(1) In accordance with Article 7 (8) of Regulation (EU) 2026/73

(2) In accordance with Article 7 (3) of Regulation (EU) 2026/73

1. Institution shall disclose in this template the GAR KPIs on flow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date calculated based on the data disclosed in template 1, on covered assets.

2. Credit institutions shall duplicate this template for turnover based and CapEx based disclosures

## E1-1 – Transition plan for climate change mitigation

flatexDEGIRO does not currently have a formally adopted transition plan for climate change mitigation within the meaning of ESRS E1-1 that meets the requirements of ESRS E1-1 paragraph 16. However, the disclosure requirements of E1-1 oblige companies to disclose whether and when they will adopt such a transition plan.

Although an integrated transition plan with systematized targets, emissions reduction pathways, and investment plans is not currently in place, individual measures and objectives in the area of climate change mitigation exist within the organization. These are organized decentral at the functional level and include operational efficiency measures to optimize energy consumption and conserve resources, selective investments in specific areas such as the expansion of electric charging stations for the vehicle fleet, company-wide guidelines, and management approaches incorporating climate-related aspects. However, these activities do not meet the requirements of a coherent transition plan in accordance with ESRS E1-1, as a unified target architecture, systematic investment planning, and explicit integration into the corporate strategy are not currently in place.

The intention is to develop and adopt a formally integrated transition plan over the next two years that meets the requirements of ESRS E1-1. As a basis for further developing the transition planning, the Group-wide GHG inventory in accordance with the Greenhouse Gas Protocol (Scope 1–3) as well as energy consumption and the energy mix were updated during the reporting year, and the key emission sources (“hotspots”) and reduction levers that can be influenced in the short term were identified. The majority of total emissions continues to originate in the upstream and downstream value chains, particularly in the “Purchased Goods and Services” category. Business travel was identified as a Scope 3 lever that can be directly influenced in the short term. The share of renewable sources in total energy consumption is 31%; furthermore, purchased electricity / electricity procurement has been further transitioned to renewable energy. The analyses show that the most effective levers for emissions reduction in the company’s own operations in the short term lie particularly in the continued transition of purchased electricity / electricity procurement, in energy efficiency measures, and

in the fleet electrification. For the Scope 3 category “Purchased Goods and Services,” increased estimation uncertainty was also identified due to a lack of primary data and the currently predominantly expenditure-based methodology; therefore, the gradual improvement of data quality and the involvement of prioritized suppliers were identified as essential prerequisites for the future derivation of reliable Scope 3 target pathways. These analysis results do not replace a formally adopted transition plan as defined by ESRS E1-1, but they form the substantive basis for its structured development.

As part of the planned development of the transition plan, the identified decarbonisation levers will be translated into concrete packages of measures with responsibilities, timelines, and, where feasible, quantitative reduction contributions relative to the base year. This includes, in particular, (i) the continued transition of purchased electricity to renewable energy, including appropriate contractual instruments, (ii) additional energy efficiency measures in office and IT operations, (iii) the fleet electrification, and (iv) the avoidance or shifting of business travel. In addition, levers in the value chain (e.g., integration of prioritized suppliers and increasing the share of primary data in Category 3.1) as well as technology- and process-related measures (e.g., virtualization/cloud optimization, Green IT standards, and efficient hardware refresh cycles) are incorporated into the transition planning.

## E1-2 – Policies related to climate change mitigation and climate change adaptation

flatexDEGIRO strives to promote environmental and climate protection measures in its current and future business activities. The focus is on managing greenhouse gas emissions, renewable energy, and energy efficiency. In addition to defined climate targets, the company is also committed to initiatives aimed at reducing Scope 1 and 2 emissions by 70% by 2030. These targets undergo a continuous review and update process to account for market changes and evolving internal requirements. flatexDEGIRO is also committed to various internationally recognized standards and certifications for promoting energy efficiency and sustainability, such as ISO 27001 or external ESG assessments by ESG rating agencies such as MSCI, S&P, and Sustainalytics. A group-wide

sustainability management system has been established to manage environmental impacts. The ESG unit, which reports directly to the CFO, takes the lead on sustainability and environmental initiatives, such as the fleet electrification or the switch to green electricity. All Group companies are required to integrate the standards set forth in the guidelines into their operational activities and to ensure that appropriate systems are implemented, employees are adequately instructed and continuously trained as needed. An annual review and update of the relevant guidelines takes place if any of the following conditions are met:

- Modification of regulatory provisions, particularly regarding the Corporate Sustainability Reporting Directive (CSRD) and MaRisk
- Changes to significant reference frameworks and underlying standards, such as ISO standards or the Greenhouse Gas Protocol (GHG Protocol)
- New insights into existing and inadequately addressed environmental issues
- Changes in the expectations of relevant interest groups, which we identify through our stakeholder communication and various dialogue formats

Adverse effects arising from greenhouse gas emissions (Scope 1–3) in the context of climate change mitigation and climate adaptation, such as those caused by the currently greenhouse gas-intensive vehicle fleet, are continuously monitored. The fleet policy serves as a central framework for minimizing emissions from the corporate vehicle fleet in the medium term. The fleet policy to promote e-mobility is intended not only to reduce environmental impact but also to foster long-term cost savings and a more sustainable corporate culture. Monitoring and administration are the responsibility of fleet management and ensure that the company leases electric or hybrid vehicles as standard, with purely combustion-engine vehicles to be used only in justified exceptional cases. This is supplemented by the business travel policy, which regulates business travel guidelines and prioritizes public transportation. It establishes binding standards for business travel to ensure that all trips are conducted efficiently and cost-effectively. This is supported by a travel management tool, which is administered and monitored by the “Purchasing” department. For sustainability reasons, public transportation should be the preferred mode of transport

whenever possible to minimize the environmental impact. In particular, flights within Germany should primarily be replaced by rail travel. Otherwise, company or pool vehicles must generally be used. If these are not available, the most efficient mode of transportation should be chosen, and, if available, voluntary CO<sub>2</sub> offsetting should be booked. The Mobility Policy creates additional incentives for employees to adopt sustainable mobility by promoting micromobility solutions. The goal of this policy is to establish a uniform subsidy program for mobility solutions such as the Jobticket for local public transportation (ÖPNV) and leasing offers for (e-)bikes, e-kick scooters, and e-scooters. This guideline is being developed by the Human Resources department with the goal of creating an attractive mobility offering for our own workforce while simultaneously helping to reduce our carbon footprint.

The business model relies on the use of data centres and server infrastructure, which can be highly energy- and emissions-intensive and have a negative impact on the climate. For this reason, the infrastructure is continuously reviewed and optimized, and investments are made in new technologies to increase performance while, independently of that, keeping energy consumption as low as possible. A corresponding policy ensures that these requirements are implemented in a sustainable manner to maintain and continuously improve the availability of data and ICT systems as well as their efficiency.

The Non-Financial Risk Control Framework enables the structured identification of climate-related risks, particularly transitory and physical climate risks as well as associated regulatory challenges, thereby contributing to the company’s long-term resilience. The policy establishes the framework for the management of non-financial risks (NFR) at flatexDEGIRO by describing the scope of non-financial risk control (NFRC), the risk management organization with roles and responsibilities, as well as relevant processes and tools to promote risk awareness among all employees. Non-financial risk control (NFRC) aims to establish risk-based and proactive management that supports the achievement of business objectives through the continuous identification, assessment, and treatment of non-financial risks, strengthens employees’ risk awareness, enables the prioritization of management measures, and simultaneously ensures compliance with national and supranational regulatory requirements. In addition, ESG exclusions have

been integrated into the investment policy, which also helps minimize emissions in the value chain. Alongside overarching general provisions regarding investment policy, which is designed to be security-oriented and conservative, the goal is to exclude investments in controversial sectors in order to be ESG-compliant. The bank will not participate in financing or investments directly related to the development, construction, or expansion of the following sectors: metals and mining, the oil and gas sector, hydroelectric power plants, forestry, and the agricultural industry (including palm oil), and the defense industry. It indirectly contributes to reducing the climate-related impacts on people and the environment, and thus also on flatexDEGIRO employees. Monitoring is carried out by the treasury and Financial Risk Management departments (including Credit Risk Management).

The relevant guidelines apply to the entire workforce and are supplemented, where necessary, by country-specific regulations, which are available to all employees on the company's internal portal. These are primarily monitored by the specialist departments, Purchasing, Human Resources, Non-Financial Risk, and treasury, as well as the ESG Officer.

flatexDEGIRO's environmental and human rights-related expectations are communicated to suppliers and IT service providers. By signing the "Business Partner Code of Conduct," suppliers and business partners commit to complying with flatexDEGIRO's minimum sustainability requirements as well as fulfilling legal obligations and international standards. Requirements for products, services, and suppliers are regularly evaluated. Sustainability criteria are incorporated into decision-making during the awarding of contracts in procurement processes.

#### **a) Climate Change Mitigation**

By embedding climate protection aspects in guidelines and business strategy, flatexDEGIRO creates a framework for the transformation of its own business operations. Through the fleet policy and business travel policy, fossil fuel consumption is systematically reduced, and business travel is conducted in a climate-friendly manner. The Mobility Policy further supports greenhouse gas reduction by providing a uniform subsidy program for mobility solutions, such as the Jobticket for local public transportation (ÖPNV)

and leasing offers for (e-)bikes, e-kick scooters, and e-scooters, and by encouraging employees to use these options. Through the Non-Financial Risk Control Framework, climate-related risks, particularly transitional and physical risks, as well as regulatory requirements are systematically identified, thereby strengthening the company's resilience. Together, these guidelines form a key starting point for addressing the impacts of climate-related risks.

#### **b) Climate Change Adaptation**

The guidelines, in particular the fleet policy, systematically incorporate aspects of climate change adaptation. Through these integrated strategies, flatexDEGIRO adapts its operational activities to changing environmental conditions.

#### **c) Energy efficiency**

flatexDEGIRO's guidelines also address the optimization of energy efficiency. The conscious use of energy resources and the implementation and utilization of energy-efficient technologies are measures that lead to improved energy efficiency and thereby reduce the Group's environmental impact.

#### **d) Use of Renewable Energy**

Although flatexDEGIRO does not have an explicit policy on the use of renewable energy, it has been gradually transitioning to renewable energy sources since 2021.

### **E1-3 – Actions and resources in relation to climate change policies**

Measures in the areas of climate change mitigation and energy to reduce greenhouse gas emissions have already been implemented in the past and are being continuously pursued. In the reporting year, the focus was on switching to purchased electricity from renewable energy sources with the goal of supplying all office locations with green electricity. In parallel, the emissions data collection tool introduced in 2024 firmly established emissions calculation in accordance with the GHG Protocol within the company. This includes the systematic determination of emissions in Scope 1, 2, and 3 categories as well as the continuous improvement of data quality. This measure enables flatexDEGIRO to identify specific reduction opportunities

and thereby achieve a further reduction in the company-wide carbon footprint. With regard to reducing greenhouse gas emissions from business travel, several complementary strategies have been implemented. First, mobility incentive programs and micromobility options are provided at the locations in Germany and the Netherlands to encourage employees to adopt sustainable mobility. In addition, the business travel policy establishes a framework that the entire workforce is required to consistently adhere to across the Group. Employees at all flatexDEGIRO locations are supported by a travel booking system that, among other things, displays expected CO<sub>2</sub> emissions during the booking process and raises awareness of environmental issues. These combined measures are expected to lead to a significant reduction in Scope 2 and 3 emissions by 2030.

The ongoing fleet electrification also contributes to reducing Scope 1 emissions.

Measures already implemented and completed in the past include the group-wide conversion of office lighting to LED technology and the transition of hardware to thin clients/laptops. These measures contributed to optimizing energy consumption and reducing resource use.

These initiatives are fundamentally aimed at addressing the interim target year of 2030 and making a long-term contribution to the goal of greenhouse gas neutrality by 2040 ("net zero") (see also Chapter E1-4: Targets related to climate change mitigation and adaptation).

### Measures by decarbonisation levers and GHG reduction impact

Decarbonisation lever	Key measures (implemented/planned)	Time horizon	GHG reduction achieved in 2025 compared to 2024 (t CO <sub>2</sub> e)	Expected GHG reduction (t CO <sub>2</sub> e)
Renewable energy / green electricity (Scope 2, market-based)	Gradual transition of purchased electricity to renewable energy at the sites; use of guarantees of origin/Energy Attribute Certificates to reflect market methodology; goal: transition of the remaining sites by 2027.	short to medium term (through 2027)	-107.3	n/a
Fleet electrification (Scope 1)	Revision of the fleet policy; increase in the share of electrified vehicles (BEV/PHEV)	Medium term (by 2030)	-45.6	
Travel avoidance & shift (Scope 3, Category 3.6)	Travel policy: Prioritizing digital formats, reducing air travel; shifting to rail/public transit where possible.	ongoing	-520.1	
Supply Chain / Procurement (Scope 3, Category 3.1)	Engagement of prioritized suppliers, improvement of data quality and increase in the proportion of primary data; integration of ESG criteria into procurement processes.	Medium term	Not yet quantifiable	
Nature-based solutions (NBS)	Currently no in-house implementation of nature-based solutions as a decarbonisation lever; monitoring of relevant developments.	n/a	0.0	n/a

### Office operations

As early as 2021, flatexDEGIRO made significant progress in decarbonisation by gradually switching to purchasing electricity from renewable energy sources. This step served as a key lever for reducing CO<sub>2</sub> emissions. By the end of 2025, virtually all flatexDEGIRO locations will be supplied with electricity from renewable energy sources. Due to the terms of the leases, there is currently no direct influence over the type of electricity supply at two leased properties. Nevertheless, constructive discussions are underway with the landlords with the goal of switching to renewable energy at these locations by 2027 at the latest. The consumption at these locations and the resulting emissions from conventionally generated electricity are considered negligible compared to flatexDEGIRO's total emissions. With this measure, no emissions from purchased electricity / electricity procurement would be generated as early as 2027, contributing significantly to the reduction target in the Scope 2 category. The switch to electricity from renewable energy sources has reduced emissions from purchased electricity by 103.3 t CO<sub>2</sub>e compared to the previous year. This measure has significantly contributed to reducing Scope 2 emissions (market-based) by 38.1% compared to the previous year.

Since flatexDEGIRO operates exclusively as a tenant at its locations, its influence on building-related measures to reduce emissions is limited. Nevertheless, the issue is actively addressed through regular dialogue with the respective building management teams to jointly identify potential for reducing emissions from heat generation. No concrete measures are currently in place, as such measures depend significantly on the decisions and cooperation of the building management and must be planned for the long term.

Another emission driver that has been identified as significant and can have a negative impact on the climate is the operation of data centres. Data centre capacities are required both for the company's own operations and for the provision of the services offered. Data centre electricity consumption has risen from 2,420 MWh to approximately 2,612 MWh compared to the previous year. The main data centres located in Germany have a Power Usage Effectiveness (PUE) value of around 1.3. This places them well below the current German average of 1.43, as determined by the Bitkom 2025 study. A lower value

indicates higher energy efficiency. Since 's data centres are powered by electricity from renewable energy sources, greenhouse gas emissions are minimal.

### Mobility

Part of the company's vehicle fleet has already been converted to electric drive. The fleet policy stipulates, with a few exceptions, that only electric or hybrid vehicles may be registered. This helps to further reduce Scope 1 emissions, as less fossil fuel is consumed. This measure is to be fully implemented by 2030, and from that point on, no new conventional internal combustion engine vehicles will be ordered. In addition, there are plans to further expand the installation of electric charging stations at selected office locations as needed to ensure charging capacity. In the reporting year, six additional electric vehicles were added, bringing the proportion of the fleet that is electrified to 21%. This measure contributed to reducing emissions from the combustion of fossil fuels (Scope 1) from 406.1 t CO<sub>2</sub>e in 2024 to 360.5 t CO<sub>2</sub>e in 2025 during the reporting year.

Mobility programs for employees, such as working from home, public transportation subsidies, micro-mobility leasing, and business travel policies that mandate the use of low-emission modes of transportation or aim to completely avoid business travel through the use of video conferencing, also contribute to reducing emissions in the categories Scope 3.6 Business Travel and 3.7 Commuter Travel. Compared to the previous year, emissions in category 3.6 have fallen by 65%, while emissions in category 3.7 have remained at the same level.

### Other Scope 3 Emissions

Reducing Scope 3 emissions is considered the most challenging aspect of climate management, as they largely arise outside the company's direct influence. The biggest hurdles include incomplete data along the value chain, limited data granularity, or the behavior of third parties, such as suppliers or commuting employees, which can only be controlled indirectly. The "Purchased Goods and Services" category accounts for the majority of our Scope 3 emissions. To reduce emissions in this category, measures to engage suppliers are particularly relevant, as these can influence the achievement of the net-zero target in the long term. Despite all this, several effective levers are available that we use to mitigate emissions: purchasing low-emission products and optimizing procurement processes.

Quantitative expected reductions for the key emission drivers are not defined in detail due to the transition plan not yet being established; however, the effectiveness of the concepts and measures is ensured through the annual carbon footprint / GHG inventory.

Due to the low investment requirements associated with the planned measures, there are currently no significant financial barriers to their implementation. Our existing liquidity reserves underscore our ability to act, even if this does not play a decisive role in the current planning of measures. No measures extending beyond the year 2030 were defined during the fiscal year.

No significant financial resources are required to implement the measures that have been taken or are planned.

## E1-4 – Targets related to climate change mitigation and adaptation

In accordance with the requirements of ESRS E1-4 on climate change mitigation and the associated minimum disclosure requirements under ESRS 2 MDR-T Section 81, has at this time focused solely on formulating overarching emission reduction targets for Scope 1 and 2 for the year 2030 and has not defined any targets directly related to the identified IROs. These overarching objectives form the strategic basis for emissions management and address the key emission sources in their entirety, which focus on direct energy use at office locations and the vehicle fleet (Scope 1 and 2). Emissions are continuously monitored and tracked to assess the effectiveness of the guidelines and concepts outlined in E1-2 and to adjust them as necessary should significant risks or opportunities arise.

In accordance with ESRS 2 MDR-T Section 81(a), flatexDEGIRO has established a two-year period to define and develop additional, granular, measurable targets within a structured process with an increasing level of detail. Such a step-by-step refinement of the objectives enables flatexDEGIRO, as a financial services provider, to gradually and fully meet the requirements of ESRS E1-4.

The planned development of granular targets is logically linked to the parallel improvement of emissions calculations in accordance with the GHG Protocol and the institutionalization of the environmental data collection tool. These infrastructural measures create the conditions for

future targets to be built on a robust data foundation and ensure their traceability and validity in accordance with the ESRS framework. This systematic approach ensures that flatexDEGIRO's targets, on the one hand, comply with the regulatory requirements of the ESRS and, on the other hand, enable a realistic and continuous reduction of greenhouse gas emissions across all scopes.

The currently valid and overarching targets were derived as follows. Our current GHG emission reduction targets are not designated as science-based targets (SBTs). No external frameworks or guidelines, such as SBTi, TCFD, or GHG Protocol pathway recommendations, were consulted in setting them. Instead, we drew on the aforementioned frameworks and adopted a pragmatic approach:

- Analysis of our own emissions structure, identification of all significant activities and value chain stages where CO<sub>2</sub> emissions arise.
- Prioritization of decarbonization potential – Selection of those business areas, processes, and supply chains where the greatest absolute and relative emission reductions can be achieved in the short to medium term.
- Definition of ambitious reduction pathways – Implementation of concrete packages of measures with the goal of achieving the greatest possible annual emission reductions.

In doing so, decarbonization levers were identified that can contribute to reducing greenhouse gas emissions: fleet electrification to completely eliminate fossil fuel consumption; switching purchased electricity to renewable energy sources; avoiding or reducing greenhouse gas-intensive business travel; promoting low-emission commuter transportation. A quantification of the respective contributions to achieving the targets has not yet been carried out. Despite the non-science-based derivation of the targets, however, it is assumed that with the current approach and the long-term net zero target by 2040, limiting global warming to 1.5 °C will be achievable, taking into account flatexDEGIRO's business model. Nevertheless, there are plans to establish science-based targets in accordance with recognized standards in the future.

## Targets 2030

Scope	Base year 2023 (t CO <sub>2</sub> eq)	Target year 2030 (t CO <sub>2</sub> eq)	Reduction target (in %)
Scope 1	415.6	124.7	-70 %
Scope 2	309.0	92.7	-70 %
Scope 3	14,038.2		
<b>Total</b>	<b>14,763.3</b>		

flatexDEGIRO has set a goal to reduce its absolute greenhouse gas emissions in Scope 1 and 2 categories by a total of 70% by 2030 compared to the base year 2023. This target will be achieved through concrete, measurable measures in the business areas where flatexDEGIRO has direct control (Scope 1 and 2). For Scope 3 emissions, the Group is pursuing a phased approach.

## Decarbonization lever and quantitative contribution to target achievement

Decarbonisation levers	Affected scope	Quantitative contribution by 2030 compared to base year 2023 (t CO <sub>2</sub> eq)	Explanation/assumptions
Switch to renewable energy sources for electricity procurement	Scope 1	-290.9	Contribution corresponds to the reduction requirement from 415.6 to 124.7 t CO <sub>2</sub> eq by 2030. Implementation via car fleet policy, gradual replacement of vehicles, and expansion of charging infrastructure.
Quantitative contribution by 2030 compared to base year 2023 (t CO <sub>2</sub> eq) (including appropriate contractual instruments)	Scope 2 (market-based)	-162.4	Includes complete conversion/renegotiation of electricity supply contracts and coverage via guarantees of origin/energy attribute certificates.

## Office operations

The difference in target ambitions between Scope 1/2 and Scope 3 does not reflect a lack of effort. It reflects the fundamental differences in data quality, scope for action, and measurability in these areas.

Scope 1 and 2 emissions are directly measurable, controllable, and reducible through appropriate measures such as fleet electrification, energy efficiency measures, and switching purchased electricity to renewable energy sources. This relies on primary data from consumption and electricity bills, which offer very high data quality. In contrast to Scope 1 and 2, as a financial services company, flatexDEGIRO has no direct operational control over Scope 3 emissions. These emissions arise outside the company's boundaries and can primarily be reduced through engagement and collaboration with external partners.

Furthermore, primary data is scarcely available, which poses a fundamental data challenge. Consulting firms, IT services, and cloud computing providers do not currently systematically report their greenhouse gas emissions, which are classified under Category 3.1 "Purchased Goods & Services." flatexDEGIRO is therefore reliant on estimates based on industry average data, which are subject to considerable uncertainty. When examining the greenhouse gas inventory in the Scope 3 category, it becomes clear that the significantly largest share of emissions is attributable to Category 3.1 "Purchased Goods & Services," which accounts for approximately 70% of the total greenhouse gas footprint (see Chapter E1-6). To determine these emissions, an expenditure-based model (EEIO databases) is used, which employs industry-typical emission factors per euro of expenditure. The methodological uncertainty of this

approach is considerable, as no established emission databases exist for specialized services.

To define a realistic medium-term target for the Scope 3 category, including subcategories, flatexDEGIRO will actively work to improve data quality. Over the next two years, the goal is to develop a strategy to enhance data quality in Scope 3 accounting. The focus will be on the gradual replacement of expenditure-based calculations with activity-based methods and primary data from prioritized suppliers. Through the continuous improvement of data collection, flatexDEGIRO aims to significantly increase data accuracy in emissions-relevant categories, so that

achievable and traceable targets can be defined based on this.

flatexDEGIRO has defined 2023 as the base year. In that year, a comprehensive data collection of all Scope categories was conducted for the first time, and a carbon footprint was prepared in accordance with the GHG Protocol. Furthermore, this year can be considered representative, as, for example, the effects of the COVID-19 pandemic, which had a significant impact on the usage patterns of office spaces and travel activities, had already subsided significantly, and business operations had largely returned to normal.

## E1-5 – Energy consumption and mix

Total energy consumption in the reporting year decreased from 3,691.2 MWh to 3,474.9 MWh compared to the previous year.

### Energy consumption and mix

	2023	2024	2025
<b>Total fossil energy consumption (MWh)</b>	<b>2,778.5</b>	<b>2,700.7</b>	<b>2,407.7</b>
<b>Share of fossil sources in total energy consumption (%)</b>	74 %	73 %	69 %
<b>Consumption from nuclear sources (MWh)</b>	0	0	0
<b>Share of consumption from nuclear sources in total energy consumption (%)</b>	0 %	0 %	0 %
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	959.9	990.5	1,067.2
The consumption of self-generated non-fuel renewable energy (MWh)	0	0	0
<b>Total renewable energy consumption (MWh)</b>	<b>959.9</b>	<b>990.5</b>	<b>1,067.2</b>
<b>Share of renewable sources in total energy consumption (%)</b>	26 %	27 %	31 %
<b>Total energy consumption (MWh)</b>	<b>3,738.4</b>	<b>3,691.2</b>	<b>3,474.9</b>

The compilation of energy data is based on both direct consumption figures from individual sites or consumers and corresponding billing statements from local energy suppliers. In the reporting year, with very few exceptions, current consumption bills were included in the calculation of total energy consumption. Data on energy consumption that was not available in a timely manner was determined using estimates: To this end, known consumption patterns of the most significant energy consumers, historical consumption

data from previous years, and additional information regarding any operational changes that could influence energy consumption were taken into account. Electricity from renewable sources is reported only if the corresponding certification has been issued and verified by an officially recognized institution. When purchasing a mix of electricity or district heating that partially includes renewable energy, a conservative approach is taken, and it is allocated to “fossil energy consumption.”

flatexDEGIRO does not operate in climate-intensive sectors.

## E1-6 – Gross Scopes 1, 2, 3 and total GHG emissions

We report our greenhouse gas emissions for Scopes 1 through 3 in a standardized format in accordance with the GHG Protocol. All values are stated in tons of CO<sub>2</sub> equivalents (CO<sub>2</sub>e). The detailed breakdown of emissions across the entire value chain provides a clear picture of which areas generate the most emissions at. This enables us to specifically identify the largest sources and derive appropriate measures from them.

Once data has been collected from all emission sources across the individual scopes, actual emissions are calculated using publicly available emission factors. The emission factors are sourced from the following sources, among others:

- Federal Environment Agency
- Global Emissions Model of Integrated Systems (GEMIS)
- Department for Environment, Food and Rural Affairs (DEFRA)
- Exiobase
- Association of Issuing Bodies (AIB)
- Manufacturers' analyses (primarily for Scope 3.1 and 3.2)
- Electricity and district heating providers

Emission factors are used to calculate the corresponding CO<sub>2</sub> equivalents (CO<sub>2</sub>e). CO<sub>2</sub> equivalents are used as a uniform metric to represent different greenhouse gases (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>). The most current and geographically appropriate emission factors are always used for the calculation.

Scope 2 emissions are calculated according to the GHG Protocol's "Scope 2 Guidance" using both market-based and location-based methods, with these methods being particularly relevant in the context of electricity consumption. The market-based method refers to the electricity suppliers and their respective specific emission values that our office locations actually use. 88% of the electricity purchased is covered by instruments such as guarantees of origin (e.g., Guarantees of Origin, Energy

Attribute Certificates). In contrast, the location-based method relies on average emission factors for the respective region in which the electricity is consumed. For the location-based method, we use current electricity mix data from the German Federal Environment Agency (UBA) or the Association of Issuing Bodies (AiB).

To reflect the market-based methodology in Scope 2, supplier-specific emission factors and contractual instruments for allocating renewable energy are used, where available. These instruments relate exclusively to electricity procurement. The remaining 12% of purchased electricity is currently not covered by such instruments (e.g., landlord/tenant electricity models in leased properties), which is why residual mix factors or regional average factors are applied in these cases.

The largest portions of our Scope 1 and 2 emissions result from our vehicle fleet, the consumption of fossil fuels such as gasoline and natural gas, and the use of district heating. In Scope 3, the categories "Purchased Products & Services" and "Employee Commuting" are the most significant emission drivers.

Primary data for relevant Scope 3 emissions is used whenever possible, such as supplier- or product-specific data. If no specific primary data is available, recognized secondary data is used, and conservative assumptions are made when necessary. The percentage of emissions calculated using primary data from suppliers or other partners in the value chain currently stands at approximately 8.5%.

The following overview provides a systematic presentation of the reporting boundaries, calculation methods, and calculation tools. The categories of Scope 3 GHG emissions from the GHG Protocol are presented as follows:

**Backgrounds for calculating the categories of Scope 3 GHG emissions**

Scope 3 category	Description
3.1 Purchased goods and services	Emissions from purchased goods and services were estimated on the basis of purchasing expenditure using spend-based emission factors due to a lack of reliable activity- or supplier-specific primary data. Due to the use of average monetary emission intensities (including the necessary allocation of expenditures to product groups), the measurement uncertainty of this approach is comparatively high; the results should therefore be interpreted as approximate values. The methodology used, key assumptions, and the resulting uncertainty of the Scope 3 estimates are explained in chapter ESRS E1-6. To reduce uncertainty, the data basis will be gradually improved in the coming years, in particular through more precise product group allocation, the involvement of suppliers, and the gradual transition to supplier/product-related emission factors and activity-based data.
3.2 Capital goods	Product-specific emission factors from manufacturer analyses were used to determine emissions from capital goods.
3.3 Fuel and energy-related Activities (not included in Scope 1 or Scope 2)	Upstream emissions resulting from fuel and energy-related activities in the upstream value chain were calculated on the basis of energy consumption. Conversion factors from DEFRA, AIB, the German Federal Environment Agency, and specific emission factors from local district heating providers were used for this purpose.
3.4 Upstream transportation and distribution	The transport of purchased goods (from both categories 3.1 and 3.2) is calculated based on the number of products purchased. It is assumed that one product corresponds to one parcel shipment.
3.5 Waste generated in operations	Emissions from waste were determined on the basis of office space using the BSR waste calculator. The resulting waste quantities in liters were converted into tons using conversion factors from the Bavarian State Office for Statistics.
3.6 Business travel	Emissions caused by business travel were calculated based on the trips recorded in the travel management tool. Specific factors for each mode of transport were multiplied by the distances traveled. For emissions from hotel stays, country- and hotel category-specific emission factors from the Hotel Carbon Measurement Initiative (HCMI) were used.
3.7 Employee commuting	To determine emissions from commuting, the distances between employees' homes and their respective office locations were calculated. In addition, the length of time employees had been with the company in months was recorded and home office arrangements were taken into account in the calculation. Average values (office equipment & heating energy) were used for emissions resulting from the use of home offices. As no individual information on employees' commuting behavior was available, the statistical distribution of the means of transport used for commuting (Destatis) was used as the basis for calculating emissions.
3.8 Upstream leased assets	Emissions resulting from rented and leased equipment are determined on the basis of utility bills for rented office and server space. For this purpose, specific emission factors are multiplied by (general) electricity consumption and reported accordingly.
3.9 Downstream transportation	Even though communication with flatexDEGIRO customers is almost paperless, certain documents are still sent by post. Based on the number of envelopes purchased, the emissions from sending letters to customers were determined using projections.
3.10 Processing of sold products	Not relevant, as the company does not produce any physical products that could be further processed.
3.11 Use of sold products	Not relevant, as the company does not produce any physical products.
3.12 End-of-life treatment of sold products	Not relevant, as the company does not produce any physical products.

Scope 3 category	Description
3.13 Downstream leased assets	Not relevant, as the company is not a lessor.
3.14 Franchises	Not relevant, as the company has no franchisees.
3.15 Investments	Scope 3 category 15 comprises pro-rata greenhouse gas emissions from equity and debt investments as well as project-related financing. The GHG Protocol distinguishes in particular between debt investments with a known use of proceeds; in these cases, the proportionally attributable Scope 1 and Scope 2 emissions of the financed projects are to be reported in Scope 3, category 15. For debt investments without a specified use of proceeds (general corporate purposes; e.g., bonds/loans without project allocation), the guidance provides for optional reporting. In the 2025 reporting year, the flatexDEGIRO Group's own investments consist primarily of bonds from public issuers held for liquidity management purposes and individual fund investments; in addition, there are only a limited number of strategic minority investments. For these positions, project-related use of funds or reliable project allocation is generally not available in the required quality, meaning that reliable quantification of project-related emissions as required by the GHG Protocol is currently not possible. Against this background, Scope 3.15 will continue to be unreported in the 2025 reporting year. The relevance of Scope 3.15 (including debt investments) will be reassessed in the next reporting cycle against the backdrop of the first voluntary reporting of the EU taxonomy templates for financial institutions, and the rationale will be further elaborated in the process documentation and report.

There is no evidence that significant biogenic CO<sub>2</sub>e emissions resulting from the combustion or biodegradation of biomass are generated within the upstream and downstream value chains.

### Total GHG emissions, broken down into Scope 1, Scope 2, and significant Scope 3 emissions

	Retrospective				Milestones and target years			
	2023	2024	2025	% Change compared to previous year	2030	2035	2040	Annual % target / Base year
<b>Scope 1 GHG emissions</b>								
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	415.6	406.1	360.6	-11 %	124.7		41.56	
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	n/a	n/a	n/a	n/a				
<b>Scope 2 GHG emissions</b>								
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	606.3	612.4	592.1	-3 %				
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	309.0	298.4	191.1	-36 %	92.7		30.90	
<b>Scope 3 GHG emissions</b>								
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)	14,038.7	17,022.4	15,747.6	-7 %	n/a		1,404	
Purchased goods and services	10,353.0	13,013.1	12,079.5	-7 %	n/a			

	Retrospective				Milestones and target years			
	2023	2024	2025	% Change compared to previous year	2030	2035	2040	Annual % target / Base year
Capital goods	1,106.3	1,003.3	1,158.0	15 %	n/a			
Fuel and energy-related Activities (not included in Scope 1 or Scope 2)	165.0	168.1	158.9	-5 %	n/a			
Upstream transportation and distribution	0.1	1.8	0.1	-97 %	n/a			
Waste generated in operations	16.3	5.5	4.3	-21 %	n/a			
Business travel	226.4	796.2	276.1	-65 %	n/a			
Employee commuting	1,902.0	1,874.3	1,870.0	0 %	n/a			
Upstream leased assets	258.4	147.5	192.4	30 %	n/a			
Downstream transportation	11.2	12.6	8.4	-33 %	n/a			
Processing of sold products	n/a	n/a	n/a	n/a	n/a			
Use of sold products	n/a	n/a	n/a	n/a	n/a			
End-of-life treatment of sold products	n/a	n/a	n/a	n/a	n/a			
Downstream leased assets	n/a	n/a	n/a	n/a	n/a			
Franchises	n/a	n/a	n/a	n/a	n/a			
Investments	n/a	n/a	n/a	n/a	n/a			
<b>Total GHG emissions</b>								
Total GHG emissions (location-based) (tCO <sub>2</sub> e <sub>q</sub> )	15,060.6	18,040.9	16,700.3	-7 %				
Total GHG emissions (market-based) (tCO <sub>2</sub> e <sub>q</sub> )	14,763.3	17,726.9	16,299.3	-8 %	n/a		1,476	

Greenhouse gas emissions, particularly CH<sub>4</sub> and N<sub>2</sub>O, resulting from the combustion of solid biomass and biogas are not reported separately. The reason for this is that only one site with very low total heat consumption is connected to a district heating network that uses biomass and biogas as energy sources for heat generation. According to network-specific information from the district heating provider, the share of energy sources of biogenic origin is less than 0.6%. Since the share of kWh consumed attributable to biogenic energy sources accounts for less

than 0.005% of total energy consumption, we have omitted a separate disclosure.

For the 2025 reporting year, sustainability information was prepared in accordance with CSRD/ESRS for the first time. The comparative figures for 2023–2024 are based on a review and correction of historical data from previous voluntary reports (GRI). During the data collection process for the 2025 GHG inventory, minor discrepancies were identified and corrected (a missing electricity meter,

incorrect energy source classification), resulting in an adjustment to the prior-year figures.

### GHG intensity per net revenue

t CO<sub>2</sub>e/million EUR

	2023	2024	2025	Change from previous year in %
Total GHG emissions (site-specific) per net revenue	46.9	44.2	29.8	-32%
Total GHG emissions (market-based) per net revenue	46.3	43.8	29.1	-33%

### Net revenues used to calculate greenhouse gas intensity

EUR

	2023	2024	2025
Total net revenue	321,256,793	410,720,003	559,771,386

### Gross GHG emissions from Scope 1, 2, and 3 categories, as well as total GHG emissions

t CO<sub>2</sub>e

	2023	2024	2025
<b>Scope 1 and 2 (market-based)</b>	<b>724.6</b>	<b>704.5</b>	<b>551.7</b>
of which: t CO <sub>2</sub> e emissions Scope 1	415.6	406.1	360.5
of which: t CO <sub>2</sub> e emissions Scope 2 (market-based)	309.0	298.4	191.1
<b>t CO<sub>2</sub>e emissions Scope 2 (location-based)</b>	<b>606.3</b>	<b>612.4</b>	<b>592.1</b>
<b>t CO<sub>2</sub>e emissions Scope 3 (total)</b>	<b>14,038.7</b>	<b>17,022.4</b>	<b>15,747.6</b>
of which: t CO <sub>2</sub> e emissions Scope 3 (upstream)	14,027.5	17,009.8	15,739.2
of which: t CO <sub>2</sub> e emissions Scope 3 (downstream)	11.2	12.6	8.4
<b>Total CO<sub>2</sub>e emissions Scope 1–3 (location-based)</b>	<b>15,060.6</b>	<b>18,040.9</b>	<b>16,700.3</b>
<b>Total CO<sub>2</sub>e emissions Scope 1–3 (market-based)</b>	<b>14,763.3</b>	<b>17,726.9</b>	<b>16,299.3</b>

## E1-7 – GHG removals and GHG mitigation projects financed through carbon credits

flatexDEGIRO follows the established principle of “avoidance before reduction before offsetting.” Our progress in recent years regarding resource efficiency and the transition to renewable energy confirms the validity of

our actions. Nevertheless, our vehicle fleet generates emissions resulting from the combustion of fuels. Since April 2021, we have been offsetting all emissions generated by vehicle use with a CO<sub>2</sub>-neutral fuel card. Through voluntary financing of climate protection projects via the use of the “DKV Card CLIMATE” fuel card, we have offset a total of 360.5 metric tons of CO<sub>2</sub> emissions, based on the calculated CO<sub>2</sub> emissions from fuel consumption in 2025.

The projects comply with the recognized “Gold Standard.” However, we take a conservative approach and ensure the completeness of reporting of the greenhouse gas emissions incurred in our carbon footprint.

value chain (“beyond value chain mitigation”). They are neither offset against gross emissions (E1-6) nor used to achieve the gross emission reduction targets (E1-4).

The carbon credits financed via the DKV Card CLIMATE are reported separately as a voluntary measure outside the

### Decarbonisation levers and quantitative contribution to achieving targets

Disaggregation/Criterion	Decommissioned in 2025	Planned (as of Dec. 31, 2025)	Comment
Total volume (t CO <sub>2</sub> e)	360.5	n/a	Decommissioning is consumption-based via the fuel card; there are no binding contractual obligations regarding future decommissioning volumes.
Share of reduction projects (%)	100%	100% (expected)	Gold Standard-certified climate protection projects (e.g., energy efficiency/renewable energy).
Share of removal projects (%)	0%	0% (expected)	Currently not assigned to any removal projects.
Quality standard (%)	Gold Standard: 100%	Gold Standard (expected)	Quality standard according to provider information.
Percentage of projects in the EU (%)	n/a	n/a	We do not have project-specific geolocation data (EU vs. non-EU) for 2025 in a standardized format.
Share with corresponding adjustment (Art. 6) (%)	0% classified	0% classified	No information regarding authorization/corresponding adjustment is available for the retired allowances; therefore, no classification as corresponding-adjusted.

To reduce emissions resulting from our vehicle fleet, we have adjusted our fleet policy accordingly and aim to further achieve fleet electrification by 2030. Electric vehicles are charged using electricity from renewable energy sources, enabling us to completely eliminate emissions resulting from the vehicle fleet. Our goal is to reduce Scope 1 emissions to zero by eliminating the combustion of fossil fuels.

### E1-8 – Internal carbon pricing

During the 2025 reporting period, the flatexDEGIRO Group does not apply any internal CO<sub>2</sub> pricing systems. As of now, there are no plans to introduce an internal CO<sub>2</sub> price or comparable instruments for internal CO<sub>2</sub> pricing.

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# Social Information

## S1-1 – Policies related to the company's own workforce

flatexDEGIRO has clearly defined strategies and policies regarding its workforce. These are systematically implemented and regularly evaluated. They aim to ensure human rights principles, equality, health protection, and fair working conditions, and form the basis for the company's sustainable human resources management. By applying these guidelines, the company addresses material social impacts, risks and opportunities. In accordance with the minimum disclosure requirements under ESRS 2 MDR-P, the concepts and guidelines presented are designed to manage material impacts, risks and opportunities related to the company's own workforce across the Group. They generally apply to all employees of the flatexDEGIRO Group (permanent, temporary, and on-call staff) at all locations. To the extent that individual regulations are tailored to specific locations or countries (e.g., benefits or working time arrangements), at least the applicable national labor law standards are observed; these are supplemented by Group-wide minimum standards. For individuals not in an employment relationship who work under the company's direction (e.g., temporary workers), the principles regarding occupational safety, equal treatment, and grievance channels apply accordingly for external service providers, additional requirements from service provider and supplier management apply.

The guidelines are adopted by the Management Board or the relevant committees and implemented by HR, Compliance, and the respective managers. Their effectiveness is monitored through regular reviews, internal controls, audits, and feedback from employee surveys/pulse checks and social dialogue. The content is communicated via the intranet, onboarding, and mandatory training; reports of violations can be addressed through defined reporting and grievance channels, including the whistleblower system.

### Health and Safety

Protecting the health of our employees is part of our commitment as a responsible employer. That is why we have implemented a Group-wide, uniform occupational safety strategy for which the Executive Board bears overall

responsibility. An important step in this process was the Group Policy on "Occupational Health and Safety." This policy defines the responsibilities of the company and its employees, with the goal of working together to keep the workplace safe and productive. Management collaborates with employees to review and update this and other policies and procedures. Employee consultation and participation in our safety system is crucial, as it supports decision-making on health and safety issues in the workplace. All employees of the Group are covered by the health and safety management system. Consultation is also incorporated into the risk assessment process and the development of safe work procedures. Suggestions for changes and improvements to policies, procedures, or safe work methods are submitted through reports to management. Annual meetings are held to consult with and inform employees about safety issues.

### Adequate Wages

With its remuneration policy, flatexDEGIRO has established a solid framework for the organization's compensation structure to ensure a competitive work environment for its employees. The policy enables an appropriate balance between fixed and variable remuneration, which together constitute total remuneration.

The remuneration policy is aligned with the institution's business strategy, objectives, values, and long-term interests and includes measures to prevent conflicts of interest. In designing the compensation system, all relevant factors were systematically identified and taken into account, in particular performance incentives, market conditions, and potential impacts on employees' risk behavior. This also includes payment terms as well as the analysis of risks that could lead to regulatory violations or conflicts of interest due to inappropriate compensation incentives.

The compensation principles are geared toward a strategy- and risk-oriented structure. The implementation of regulatory requirements is at the core of the compensation system. Key pillars of the compensation system include risk-oriented performance management through the appropriate assumption and control of risks, aligning employee actions with corporate value-enhancing goals, and ensuring the company's attractiveness as an employer in the labor market.

The compensation system is designed to avoid negative incentives for taking on disproportionate risk. The policy aims to make compensation plans transparent and communicate them to employees.

The Compensation and Benefits Policy applies to all employees of the organization. It defines the principles upon which the organization's compensation and benefits structure is based. It also serves as a solid foundation for reference regarding the structure and elements of compensation for both employees and the Human Resources department.

The policy is based on three core principles. First, the principle of "equal pay for equal work" applies. The established pay structure ensures that all employees are compensated according to their skills and experience. Second, the organization is committed to non-discrimination. No discrimination based on faith, skin color, religion, nationality, or gender will be tolerated. All employees receive compensation commensurate with their respective roles within the organization. Third, the organization adheres to the principle of transparency. This means that employee pay and compensation are clearly traceable and based on their role and performance.

In addition, the Compensation and Benefits Policy aims to provide relevant stakeholders with a description of the various components of compensation, including both fixed and variable elements. Country-specific requirements apply to each compensation component in accordance with the respective national legislation. The Human Resources department and the Compliance function ensure and monitor the appropriate establishment, design, and implementation of the compensation systems. Appropriate compliance structures ensure that the risk orientation of compensation is not restricted or negated by hedging or other countermeasures.

The level of fixed compensation ensures that employees do not become significantly dependent on variable remuneration. Fixed and variable remuneration are in an appropriate ratio to one another, with the proportion of the fixed component in total remuneration being sufficiently high so that a flexible compensation policy regarding the variable component is fully possible and the payment of a variable component can also be entirely waived.

## **Training and Competency Development**

- Policy on Learning and Development
- Policy Talent Management Policy
- e-learning Policy

Our learning and development policy defines the principles, processes, and responsibilities for the continuing education of all employees. It applies to internal and external training programs as well as to mandatory and recommended development measures.

Its goal is to ensure the continuous professional development of our employees, promote individual development and career planning, and build core competencies, technical, methodological, digital, social/intercultural, and personal. It supports the achievement of strategic corporate goals such as innovation, increased efficiency, and market growth; strengthens competitiveness, compliance, and digital processes; and integrates equality and the targeted promotion of women into all initiatives. In addition, we promote leadership skills, sustainable talent management, and the development of young talent through vocational training and dual study programs.

Our training initiatives actively contribute to embedding our values. We ensure that employees prioritize customer needs, act responsibly and with integrity, promote equal opportunity, and collaborate across departments. Lifelong learning is an integral part of our work culture. All learning and development activities are closely linked to strategic corporate goals and make a direct contribution to the company's success. The Chief Human Resources Officer (CHRO) is responsible for this policy.

This overarching policy is supported by additional policies designed to efficiently and effectively achieve the overarching strategic goals. These include, among others, policies on talent management and e-learning. The e-learning policy aims to ensure compliance by helping employees understand and adhere to legal and industry-specific standards. It promotes safety and risk management through training on relevant protocols and procedures. Other key areas include fostering a consistent understanding of standard processes, developing necessary skills to increase productivity, and strengthening the corporate culture through values, ethics, and mission.

Additionally, the policy supports performance evaluation and improvement, addresses skill gaps, and increases efficiency.

All employees, including full-time and part-time staff, interns, students, and temporary workers with contracts of three months or longer, are eligible to participate in e-learning content. Exceptions include employees on extended leave and external auditors. Assignment is based on the need-to-know principle to ensure relevant content for the respective target group.

The labor market in the banking and financial services sector is characterized by a growing shortage of skilled workers. In a highly competitive market, it is crucial to position oneself with a human resources strategy geared toward a dynamic environment and to increase the company's attractiveness through targeted measures, thereby attracting and retaining highly qualified employees in the long term. With the talent management policy, we are establishing a framework to counteract this trend. The goal of this policy is to describe the talent management practices applied by flatexDEGIRO, which aim to create a work environment in which employees can plan, reflect on, and further develop their professional skills.

### Work-life balance

- Flexible work schedules, trust-based working time, sabbaticals, and partner months.
- Policy on Working Hours and Overtime
- Policy on Mobile Working

Social changes bring with them different expectations regarding work-life balance. At flatexDEGIRO, this has already played a central role in the past. With the flexible working time models that have been in place for years, we support employees through various life stages and offer them opportunities to balance work and private life in a way that suits their individual needs. These include, for example, flexible working hours, trust-based working time, sabbaticals, and partner months. In particular, the return of parents to the workforce is supported through various part-time models and the coverage of childcare costs until the child starts school. Additionally, we offer our workforce the option of mobile working, which is anchored in clear regulations within an explicit policy.

The handling of extra work and overtime is regulated in separate guidelines adapted to the legislation of the respective country. The aim of these guidelines is to create a clear and transparent framework for the organization of working hours and breaks, as well as for the management of overtime and extra work. They apply to all employees of flatexDEGIRO Bank SE, as well as to employees of flatexDEGIRO SE who work at the Bank's locations or, where applicable, at other Group companies directly involved in the Bank's business operations. It establishes clear procedures and responsibilities and ensures that the working hours of all employees are effectively organized in accordance with their personal needs, as well as legal provisions, operational requirements, and corporate objectives.

To further achieve these goals, overtime and extra work should be avoided whenever possible. Where this is unavoidable, standardized regulations for recording and compensating these additional working hours will be established. Overtime and extra work should, whenever possible, be compensated with corresponding time off. Compensation for overtime and extra work in the form of monetary payments should only occur in exceptional cases.

In addition, we collaborate with external experts who provide employees with psychological, educational, and financial support and help them balance family and career, e.g., by organizing courses, workshops, and childcare options, as well as through a service hotline offering initial telephone counseling for challenges in personal life management. Our managers and works council members can also contact our external experts for support on issues related to their roles. In 2024, flatexDEGIRO employees continued to have the option of hybrid work. All employees have been or are being equipped with the necessary equipment. The so-called New Work Model is widely accepted by the workforce and has now become firmly established. We are also increasingly finding that New Work is specifically sought after and demanded by the younger generation in the context of recruitment.

### Secure employment

flatexDEGIRO pursues an employment policy focused on long-term, secure employment relationships. The vast majority of the workforce is employed under permanent full-time contracts. Fixed-term contracts, temporary agency

work, and other atypical forms of employment are used only in justified exceptional cases. The goal is to minimize employment risks and ensure planning security for both employees and the company.

To ensure employability, structured continuing education and training programs are offered. In the event of restructuring, the company prioritizes internal transfers, retraining, and socially responsible solutions to avoid or limit layoffs for operational reasons. In addition, comprehensive social protection is provided through statutory and company-provided benefits (e.g., pension plans, health and accident insurance), which cushion income risks in the event of major life events.

### **Respect for Human Rights and Elimination of Discrimination**

As an international corporation, we are fully committed to respecting and promoting human rights. We view the protection of human rights as an indispensable part of our corporate culture and our daily work.

In this context, we strive to comply with a wide range of international standards and principles, including

- Universal Declaration of Human Rights
- ILO Core Labor Standards: International Labor Organization Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights

Our commitment is based on the principles of the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the core labor standards of the International Labor Organization (ILO), and the OECD Guidelines for Multinational Enterprises. We are convinced that respect for human rights is not only an ethical obligation but also the foundation for sustainable economic success.

Responsibility for implementing and adhering to this Human Rights Declaration lies with the Management Board. An interdisciplinary team (HR, Compliance, Procurement, ESG, Legal) monitors compliance with human rights due diligence obligations, analyzes risks, and develops preventive measures. We conduct annual reviews to assess and further develop the effectiveness of our measures. Complaints and reports of human rights violations can be submitted at any time via our anonymous whistleblower system. We guarantee that whistleblowers are protected from retaliation and that every report is carefully investigated. No complaints were received in the 2025 reporting year.

In developing and implementing labor-related policies, flatexDEGIRO ensures compliance with the United Nations Guiding Principles on Business and Human Rights as well as high national legal standards.

flatexDEGIRO explicitly pursues a zero-tolerance policy toward trafficking in human beings, forced labour, and child labour. As part of its commitment to the UN Global Compact, it excludes forced labour and advocates for the abolition of child labour. Governance and due diligence processes ensure compliance with these commitments.

The company is expressly committed to combating all forms of unlawful and unfair discrimination and maintains a zero-tolerance policy toward intimidation, bullying, or harassment. All employees are treated fairly and without prejudice, regardless of their employment status.

The Diversity, Equity & Inclusion Policy (DEI Policy) explicitly and comprehensively covers all material grounds for discrimination under EU law and national legal frameworks. These include age, race, gender, gender identity, marital status, parenthood, physical or mental disability, nationality, ethnic origin, socioeconomic background, skin color, educational level, religion, political opinion, worldview, or sexual orientation. This ensures that all forms of discrimination covered by applicable legislation are addressed.

flatexDEGIRO has established specific obligations for particularly vulnerable groups within the workforce.

- People with disabilities: flatexDEGIRO is explicitly committed to supporting people with disabilities by providing the necessary support for their success and ensuring that all people with disabilities have equal access to employment opportunities.
- Employees with different employment statuses: Regardless of whether they are part-time, full-time, or temporary employees, all employees are treated fairly and with respect and are given equal opportunities for development and advancement.
- General Support Measures: Furthermore, flatexDEGIRO is committed to creating a work environment that fosters the personal and professional development of all employees and encourages them to realize their full potential and utilize their unique talents. The individual differences and contributions of all team members are recognized and valued.
- Furthermore, flatexDEGIRO pursues specific inclusion and support initiatives for groups at increased risk of vulnerability. These include, in particular
  - i. people with disabilities (equal access to employment and reasonable accommodations in the workplace),
  - ii. parents and family caregivers (flexible work-time and work-location models as well as support services),
  - iii. employees in probationary periods or on fixed-term contracts (standardized onboarding and feedback processes), and
  - iv. underrepresented groups in leadership and tech roles (targeted networking and awareness initiatives, such as organizing hackathons and participating in the “Women in Technology World Series”).

To prevent, mitigate, and combat discrimination, flatexDEGIRO has established specific procedures and measures to effectively implement DEI concepts.

#### **Preventive measures:**

- Continuous review of HR processes to ensure they reflect the diverse skills and talents of all employees and meet performance standards.
- Regular review of all employment practices and procedures with all relevant stakeholders to ensure fairness at all times.

- Training, development, and career advancement opportunities for all employees.
- Recruitment based exclusively on skills and qualifications.
- Involvement of local workers' representatives in implementation, taking into account national and supranational laws as well as cultural customs

#### **Reporting mechanism and corrective measures:**

- Group-wide internal reporting channel for inquiries, reports, and violations
- Encouragement for all employees who have been discriminated against or feel discriminated against to share their concerns with the HR or Compliance department
- Disciplinary action against those who violate the guidelines.
- Taking corrective action as soon as discrimination is identified.

#### **Governance and Responsibilities:**

- Managers bear a special responsibility to foster an environment of respect.
- Integrating short-, medium-, and long-term DEI goals into the HR and sustainability strategy

#### **Transparency and oversight:**

- Annual public reporting on activities and progress in promoting diversity and inclusion
- Ensuring that all employees are informed about the DEI policy and encouraged to comply with it.
- The implementation procedures thus ensure a systematic approach to preventing discrimination, responding swiftly to violations, and continuously promoting diversity and inclusion throughout the Group.

#### **Management system for the prevention of work-related accidents**

As a responsible employer, our goal is to protect the health and safety of our employees and prevent work-related accidents. To this end, we have implemented a Group-wide, standardized health and safety management system for which senior management bears overall responsibility. A central component is the Group policy “Occupational Health and Safety,” which defines clear responsibilities for companies and employees.

The management system includes:

- Risk assessments and the development of safe work procedures
- Regular review and updating of policies and processes
- Consultation and involvement of the workforce to improve decision-making on health and safety issues

All employees are involved in the system. Suggestions for improvements are systematically forwarded to management.

To prevent work-related accidents and health risks, we regularly conduct:

- Occupational medical check-ups
- Training on occupational safety, occupational health and safety, first aid, and fire safety
- Online training for mobile working and ergonomic workplace design

In addition, we offer measures such as stress management, exercise programs, and ergonomic workstations (e.g., height-adjustable desks). Employees also receive targeted information and training as part of “Healthy Days.”

With the rise of mobile working, we are continuously expanding our approach to ensure safety and health even outside the traditional workplace.

## S1-2 – Processes for engaging with own workforce and workers’ representatives about impacts

flatexDEGIRO relies on structured social dialogue and various participation formats to systematically incorporate the perspectives of its own workforce into the identification and management of material impacts, risks and opportunities.

In countries with workers' representatives, regular, at least annual, exchanges take place with works councils regarding working conditions, operational changes, and health and safety issues. In addition, group-wide and location-specific employee surveys are conducted, the results of which are incorporated into the further development of HR programs as well as into the materiality

assessment. Managers use feedback and development discussions to address individual needs and identify collective issues at an early stage.

Operational responsibility for engaging the own workforce lies with HR (Group HR) in close collaboration with the respective managers and, where applicable, workers' representatives. Group HR consolidates the results, derives measures and adjustments to HR programs from them, and ensures follow-up. The highest-ranking body responsible for ensuring that the insights gained are incorporated into the corporate strategy is the Management Board. It is informed via the established internal reporting system and takes relevant results into account when prioritizing and further developing guidelines, programs, and management processes.

In the area of occupational health and safety, employee involvement is enshrined in the Occupational Health and Safety Policy. Management and employees maintain close communication on all relevant occupational health and safety topics. Employees are actively involved in risk assessments, the design of safe work processes, and the evaluation of preventive measures. Suggestions for improvement can be submitted at any time through the responsible managers or health and safety officers.

## S1-3 – Processes to remediate negative impacts and channels for the company’s own workforce to raise concerns

flatexDEGIRO has established a policy that provides a group-wide framework for the prevention, identification, and handling of misconduct with potentially negative impacts on employees. It defines mandatory reporting channels, secure whistleblower systems, and standardized documentation of all incidents, which are centrally recorded in Jira. A structured assessment model (severity, frequency, cooperation, organization-wide impact) ensures an objective and fair analysis of each incident and the derivation of appropriate remedial measures. The policy integrates regulatory requirements such as MaRisk, BCBS governance, EBA guidelines, labor law standards, data protection (GDPR/BDSG), and whistleblower protection to comprehensively safeguard employees against discrimination, retaliation, and non-compliant behavior.

flatexDEGIRO maintains a multi-tiered system of reporting, complaint, and remedial processes through which employees can report actual or potential negative impacts and seek redress.

All flatexDEGIRO employees can submit reports to their direct supervisors, the HR department, the compliance officer, or workers' representatives. Our anti-discrimination policy additionally outlines formal and anonymous reporting channels, including an external ombudsman. All reports are reviewed confidentially and impartially. In addition, there is a group-wide whistleblower system that serves as a confidential and, upon request, anonymous channel for reporting violations of laws or internal regulations. It meets the requirements of the European Whistleblower Directive as well as the respective national implementing acts and covers, in particular, issues such as corruption, money laundering, data protection, and consumer and employee protection.

To ensure the effective implementation of the policy, clear, standardized procedures are in place to guarantee that reported or observed incidents are handled in a timely, structured, and transparent manner. All incidents must be submitted via defined reporting channels and are subsequently documented centrally by HR or the relevant functions (Compliance, Legal, Internal Audit), thereby ensuring consistent traceability. As part of the regulated investigation process, factual findings, policy violations, root cause analyses, and recommendations for action are systematically identified and recorded in a formal investigation report.

To determine appropriate measures, each incident is assessed using a standardized evaluation model that takes into account severity, frequency, cooperation/insight, and organization-wide impact, thereby enabling a consistent, fair, and evidence-based approach. The handling process includes appropriate protective measures for affected individuals as well as subsequent notification of those involved regarding findings and follow-up actions. Confirmed violations result in graduated employment-law measures up to and including termination of employment.

All employees complete mandatory annual training on behavioral standards and reporting procedures. The availability of reporting channels is further supported by

mandatory annual training and internal communications, which ensure that employees are informed about their reporting options. Managers have a special responsibility to exemplify these principles and actively promote them.

In the reporting year, the effectiveness of the complaint and remedial processes is reviewed based on, among other things, the number and type of reports received, processing time, implementation of remedial measures, and results of employee surveys. No incidents of discrimination were reported in previous years or in the current reporting year 2025, which indicates the preventive effect of the guidelines, training, and awareness campaigns.

The company tracks and monitors reported incidents by mandatorily recording all conduct events in the central Jira system, where each event is documented using defined required fields and continuously updated. This enables transparent tracking of the processing status and the measures taken. Investigation reports contain structured findings, identified policy violations, and analyses of causes and measures, ensuring that the implementation of recommendations remains verifiable.

The annual reports evaluate the number, type, and outcomes of reports and serve to systematically review the effectiveness of the reporting channels and identify necessary improvements.

Relevant internal stakeholders, in particular employees, managers, HR, Compliance, Legal, Internal Audit, and, where required by law, the works council, are integrated into the processes, thereby ensuring that the channels meet the needs of their target users.

Mandatory training and communication of the reporting channels enhance user confidence and thus the effectiveness of the channels, while the protection of whistleblowers under the HinSchG increases the willingness to report.

All employees complete mandatory annual training on standards of conduct and reporting procedures. Managers have a special responsibility to exemplify these principles and actively promote them.

## S1-4 – Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches

Based on the identified material topics, flatexDEGIRO pursues a systematic approach to measures that includes both preventive and corrective elements.

In the area of occupational health and safety, measures include ergonomic workplace design with height-adjustable desks and ergonomic chairs, large-format monitors, occupational medical check-ups, vaccination programs, and stress management and fitness programs. 's Occupational Health and Safety Policy requires managers to integrate health and safety aspects into all operational processes, conduct regular risk analyses, and provide ongoing training to employees.

flatexDEGIRO identifies overtime as a potential negative impact on its own workforce, particularly with regard to working hours, work-life balance, and employee health. Overtime is only mandated when absolutely necessary, such as for timely project completion or urgent tasks. To avoid it whenever possible, the company relies on careful planning and monitoring of workloads. Overtime worked must be reduced promptly, with appropriate compensation provided in the form of time off or financial remuneration depending on the location. In all countries where we operate, national labor laws govern the handling of overtime and generally require its avoidance. The effectiveness of these measures is evaluated through regular reviews of working hours, employee feedback, and compliance with legal limits to minimize overtime in the long term.

The effectiveness of the measures is measured using defined KPIs such as turnover rate, sick leave, accident rates, training hours per employee, participation in feedback meetings, and employee satisfaction indicators. Notable trends are analyzed by the HR department and translated into adjustments to the measures.

Social changes bring with them different expectations regarding work-life balance. This has already played a

central role in the past, and with the flexible work-time models that have been in place for years, we support employees in various life stages and offer them opportunities to balance work and personal life in ways that suit their individual needs. These include, for example, flexible work hours, trust-based working time, sabbaticals, and partner months. In particular, the return of parents to the workforce is supported through various part-time models and the coverage of childcare costs until the child starts school.

In addition, we collaborate with external experts who provide employees with psychological, educational, and financial support and help them balance family and career, for example, by organizing courses, workshops, and activities for children, as well as through a service hotline offering initial telephone counseling for challenges in personal life management. Our managers and works council members can also contact our external experts for support on issues related to their roles. In 2025, flatexDEGIRO employees continued to have the option of hybrid work. All employees have been or are being provided with the necessary equipment. The so-called New Work Model is widely accepted by the workforce and has now become firmly established. We are also increasingly finding that New Work is specifically sought after and demanded by the younger generation in the context of recruitment.

In addition to the individual measures described, flatexDEGIRO consolidates key activities into a rolling HR and People initiatives portfolio with annual planning and regular progress monitoring. This portfolio specifically includes initiatives in the areas of occupational safety & health, working hours/work-life balance, learning and development, compensation & benefits, and diversity, equity & inclusion. Group HR, local HR teams, and the respective managers are responsible for design and implementation; workers' representatives are involved in matters relevant to co-determination. The necessary resources (personnel expenses, material/service budgets, external consulting services, and digital HR tools) are allocated and tracked as part of the annual budget and personnel planning.

The identification and prioritization of necessary measures is carried out through multiple input channels: results of the DMA, HR metrics (e.g., working time data, sick leave,

turnover), analyses from employee surveys and pulse checks, findings from the whistleblower and complaint system, as well as internal controls/audits. Based on this input, proposed measures are evaluated by HR and the relevant functional departments (including Compliance, Legal, and Occupational Health & Safety), prioritized in terms of effectiveness and feasibility, and incorporated into operational planning as well as adjustments to guidelines and processes.

To capitalize on the opportunities identified within the DMA framework, flatexDEGIRO is focusing in particular on further developing flexible work models (hybrid work, flexible working hours) and expanding its professional development and training programs. The goal is to strengthen employee satisfaction, employer attractiveness, and retention, thereby achieving positive effects on productivity and efficiency in the medium term. Social dialogue (works councils) is utilized for this purpose as a continuous feedback and improvement process.

flatexDEGIRO also regularly reviews whether its own practices could unintentionally cause or exacerbate negative effects on employees. This applies in particular to the structuring of workloads and target systems, the handling of overtime, the application of compensation mechanisms, and the use of personal data. Strict data protection and access policies (GDPR/BDSG) as well as the need-to-know principle apply to data processing; HR analyses are conducted for specific purposes and, where possible, in aggregated form. In procurement and in the management of external service providers, minimum standards related to labor and human rights are contractually enshrined, and potential conflicts of interest between efficiency, costs, and labor standards are addressed within the framework of governance processes.

The measures and management approaches described below apply to the company's own workforce (employees in a direct employment relationship) and are valid across the Group for all locations and organizational units. Individual benefits (e.g., childcare subsidies or local mobility options) may be tailored to specific locations or countries based on national conditions. When planning and managing measures, flatexDEGIRO distinguishes between a short-term time horizon (< 1 year), a medium-term time horizon (1–5 years), and a long-term time horizon (> 5 years). In the

short-term time horizon, operational occupational health and safety measures (e.g., ergonomic equipment, occupational health checkups), mandatory annual training, and the ongoing management of working hours and overtime are implemented; these measures will be established across the Group by the 2025 reporting year and will be continuously refined. In the medium term, the rolling portfolio of HR and people initiatives (e.g., process digitization, learning and development, and diversity, equity & inclusion) will be further expanded; additional implementation steps are planned for this starting in 2026. In the long term, the measures aim to sustainably strengthen corporate culture, leadership, and employer attractiveness; corresponding programs will be continuously maintained and expanded as needed.

The effectiveness of the measures taken is monitored using key performance indicators (including employee surveys, turnover rate, accident statistics, and training feedback) and evaluated at least annually. In the 2025 reporting year, an "overall average score" of 6.7 was achieved in the employee survey; the target value for the employee turnover rate (<= 10%) has not yet been reached, standing at 14%. Based on this deviation, additional measures to strengthen employee retention will be developed for 2026/27. For the planned or further-to-be-developed measures, the expected outcomes include, in particular, an improvement in the employee experience, increased satisfaction with training initiatives, and progress in diversity. Goal achievement is tracked via the defined KPIs.

In connection with the transition to a more climate-friendly economy, flatexDEGIRO does not anticipate any material negative impacts on its own workforce (e.g., restructuring, job losses, or necessary retraining resulting from a climate transition plan) due to its low-emission, digitally driven business model. Accordingly, no specific remedial measures within the meaning of ESRS S1-4 AR 43 were required in the 2025 reporting year; further training and change management are supported on an ongoing basis as part of the learning and development approach, regardless of this.

## S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

flatexDEGIRO uses time-bound and results-oriented targets to track progress in addressing material adverse impacts, promoting positive impacts, and managing material risks and opportunities related to its own workforce. The targets are anchored in the HR strategy and are set in close coordination between the Management Board, HR, and relevant functional departments, as well as, where applicable, workers' representatives.

When setting targets, insights from employee surveys/pulse checks and feedback from social dialogue are systematically considered. Targets are defined as part of the annual HR planning process and are discussed in

appropriate steering formats with the Management Board, HR, and relevant functional departments. If targets are adjusted, this is done considering the expected impact on employees as well as available resources; lessons learned from target tracking are incorporated into the further development of the HR strategy.

Group-wide, harmonized quantitative targets are not yet available for all key areas related to the company's own workforce. flatexDEGIRO has therefore set a two-year timeframe to develop additional, measurable objectives and integrate them into HR management. These targets will be specified as part of the rolling HR planning process, involving the relevant functions and, where applicable, workers' representatives.

The following table provides a summary of key objectives.

Target area	Target/KPI	Time horizon	Target value or target direction	Monitoring/status 2025
HR process digitalisation/employee experience	Proportion of digitised HR processes	Rolling (annual)	Target path to be further developed in 2027	Management via HR project portfolio and HR reporting; progress is recorded and reported internally.
Learning & Development	Satisfaction with training measures (feedback score)	Annually	≥ 65% satisfaction rating	Survey on training feedback; evaluation and adjustment of offerings with y within the L&D portfolio.
Diversity, equity and inclusion	Proportion of women in management positions	Medium/long term (rolling)	Continuous increase: Target path to be further developed in 2027	KPI monitoring; measures include awareness and networking formats.
Employee satisfaction	Employee survey	Annual	≥ 6.5 „Overall average score“	2025: Score 6.7; analysis by HR and derivation of measures for the issues addressed
Employee retention	Turnover rate	Annual	≤ 10 % Staff turnover rate	2025: Turnover rate 14%; analysis by HR and derivation of measures to manage retention and workload.

Target achievement is reviewed at least annually. Deviations are analyzed and, if necessary, lead to adjustments to target values, additional measures, or prioritization in resource allocation.

## S1-6 – Characteristics of the undertaking's employees

flatexDEGIRO describes the key characteristics of its own employees to convey an understanding of its employment concept and the resulting impacts. This includes the breakdown by country, gender, employment type, and turnover.

The reported employee figures are based on the Group-wide HR information system and include all employees of the fully consolidated Group companies. The figures are reported as headcount; no conversion to full-time equivalents (FTE) is performed for these tables. Figures as of the reporting date refer to the workforce as of December 31, 2025; in addition, the average number of employees for the fiscal year is reported, in line with the consolidated financial statements. For the breakdown by contract type, the respective national definitions for permanent/fixed-term and on-call employees are used.

The average number of employees reported in the 2025 Annual Report (see "Chapter 1.5 Employees and Locations") is 1,210 (previous year: 1,271) and corresponds to the average number of employees shown here.

### Number of employees by gender

	Number of employees	Number of employees (Average)
Male	818	830.75
Female	378	379.25
Other	0	0
No data	0	0
<b>Total</b>	<b>1,196</b>	<b>1,210</b>

The figures in the "Other" and "No data" categories are shown as 0, as data for these two categories cannot be disclosed due to data protection regulations.

### Number of employees by region

State	Number of employees
Germany	683
Netherlands	240
Bulgaria	273

### Number of employees by type of contract, broken down by gender

	Female	Male	Other	Not disclosed	Total
<b>Number of employees</b>	<b>378</b>	<b>818</b>	<b>0</b>	<b>0</b>	<b>1,196</b>
of which: Number of permanent employees	353	762	0	0	1,115
of which: Number of temporary employees	25	50	0	0	75
of which: Number of non-guaranteed hours employees	0	6	0	0	6
<b>Number of full-time employees</b>	<b>299</b>	<b>775</b>	<b>0</b>	<b>0</b>	<b>1,074</b>
<b>Number of part-time employees</b>	<b>79</b>	<b>43</b>	<b>0</b>	<b>0</b>	<b>122</b>

## Number of employees by type of contract, broken down by region

	Germany	Netherlands	Bulgaria	Total
<b>Number of employees</b>	<b>683</b>	<b>240</b>	<b>273</b>	<b>1,196</b>
of which: Number of permanent employees	659	192	264	1,115
of which: Number of temporary employees	24	7	12	43
of which: Number of non-guaranteed hours employees	0	6	0	6
<b>Number of full-time employees</b>	<b>600</b>	<b>204</b>	<b>270</b>	<b>1,074</b>
<b>Number of part-time employees</b>	<b>83</b>	<b>36</b>	<b>3</b>	<b>122</b>

In the reporting year, 197 employees left our company. The employee turnover rate was 14%.

## S1-8 – Collective bargaining coverage and social dialogue

Our employment relationships are not subject to collective bargaining agreements. Within the EEA, 100% of employees are represented by workers' representatives. Since the conversion to a Societas Europaea (SE) toward the end of 2025, the European level has been ensured by the SE Works Council, supplemented by national works

councils. Due to the conversion process not being completed until the end of 2025, the formal agreement regarding the SE Works Council will be reached in the first quarter of 2026; preparatory discussions on this matter are already underway.

The following overview presents collective bargaining coverage and social dialogue in accordance with ESRS S1-8 AR 70

### Reporting on collective bargaining coverage and social dialogue

	Collective bargaining coverage		social dialogue
Coverage rate	Employees – EEA (for countries with >50 employees, accounting for >10% of the total)	Employees – Non-EEA countries (estimate for regions with >50 employees accounting for >10% of the total)	Workplace representation (EEA only) (for countries with >50 employees accounting for >10% of the total)
0–19%			
20–39%			
40–59%			DE
60–79%			
80–100%			NL

## S1-9 – Diversity metrics

To ensure transparency regarding its diversity structure, flatexDEGIRO reports on the gender distribution at the senior management level as well as the age distribution of its employees. The definition of the senior management

level includes the Management Board of flatexDEGIRO SE and the Group Executive Committee. The data also serves to guide DEI objectives and is compared with external regulatory expectations.

**Number of employees in top management by gender**

	Number of people	in %
Female	4	6%
Male	66	94%
<b>Total</b>	<b>70</b>	<b>100%</b>

At flatexDEGIRO, top management refers to the first and second levels of management below the Management Board. In the reporting year, the proportion of female executives in top management was 12%. More than half (64%) of the workforce is between 30 and 50 years old. The age structure is broken down as follows.

**Number of employees by age group**

	Number of employees	in %
under 30 years old	244	20%
30-50 years old	767	64%
over 50 years old	185	15%
<b>Total</b>	<b>1,196</b>	<b>100%</b>

**Key performance indicators for training and skills development – Training hours**

	Female	Male	Other	Not Disclosed	Total
<b>Average number of training hours</b>					
Of which: Employees with management functions	30.5	15.3	0	0	<b>18.3</b>
Of which: Employees without management functions	13.9	15.1	0	0	<b>14.7</b>
<b>Total</b>	<b>15.8</b>	<b>15.2</b>	<b>0</b>	<b>0</b>	<b>15.4</b>

**Key performance indicators for training and skills development – Performance and career reviews**

	Female	Male	Other	Not Disclosed
Employees with management function	100%	99%	0%	0%
Employees without management function	96%	97%	0%	0%

**S1-10 – Adequate wages**

flatexDEGIRO aims to pay all employees adequate wages that are in line with applicable benchmarks for adequate wages. The compensation system considers national minimum wages as well as, where available, recognized benchmarks for determining living wages, and is regularly reviewed for market conformity and internal consistency.

If the analysis determines that not all employees in a country receive remuneration above the respective benchmark, the affected countries and the proportion of employees are disclosed in accordance with ESRS S1-10.

**S1-13 – Training and skills development metrics**

Training and skills development are central elements of flatexDEGIRO's HR and sustainability strategy. To meet our commitment to a comprehensive training program, we conducted professional, regulatory, technical, and behavioral training sessions across the Group in the 2025 reporting year. These include, among other things, mandatory training on compliance, data protection, information security, diversity, and anti-discrimination, as well as programs for leadership development and individual professional development.

## S1-14 – Health and safety metrics

The occupational health and safety management system at flatexDEGIRO is based on the Occupational Health and Safety Policy and covers all locations and employee groups. It includes processes for risk assessment, preventive measures, training, emergency management, and structured procedures for recording and analyzing work-related injuries, illnesses, and near misses.

100% of flatexDEGIRO's workforce is covered by a health and safety management system. In the reporting year, not a single fatality attributable to work-related injuries was recorded. Due to flatexDEGIRO's business model, we record only a few reportable commuting and work-related accidents involving our employees. In the reporting year, six reportable work-related and commuting accidents were recorded. Despite this very low rate, it is important for flatexDEGIRO to continuously promote a culture of safety within the company.

### Occupational accidents

	Total
Number of recordable work-related accidents	6
Number of days lost due to work-related incidents	12
Rate per 1 million working hours	2.9

### Key performance indicators for work-life balance

	Female	Male	Other	No data	Total
Total number of employees that were entitled to and make use of family-related leave	378	818	0	0	1,196
Total number of entitled employees that took family-related leave	30	26	0	0	56

## S1-16 – Remuneration metrics (pay gap and total remuneration)

The unadjusted gender pay gap refers to the pay difference between male and female employees, expressed as a percentage of the average pay of male employees.

## S1-15 – Work-life balance

In accordance with applicable regulations, all flatexDEGIRO employees are generally entitled to parental leave. flatexDEGIRO has documented and established the country-specific framework conditions for parental and family leave in its policy on vacation and absence regulations. This policy defines the binding standards for implementing applicable national legislation at all operating locations, Germany, Austria, the Netherlands, and Bulgaria. In all of these countries, national laws and regulations guarantee all employees the right to family-friendly leave. The specifics of these entitlements are governed by the applicable national legislation of the respective country. They are fully recognized, and the company ensures their implementation as well as protection against discrimination or termination during and after the leave is taken. In the reporting year, a total of 56 employees took leave for family-related reasons, including 26 male and 30 female employees.

A value of 16.9% was determined for the year 2025. To calculate the gender pay gap, flatexDEGIRO applied the calculation methodology in accordance with AR 98, first recording the gross hourly wage of all employees and then applying the standardized formula. This involves subtracting the average gross hourly wage of female employees from the average gross hourly wage of male

employees and dividing the result by the average gross hourly wage of male employees. This transparently illustrates the percentage pay gap between women and men in the current reporting period.

The ratio of the highest-paid individual's total annual remuneration to the median total remuneration of all employees (excluding the highest-paid individual) was 4.6. This ratio is calculated by dividing the total annual remuneration of the highest-paid individual in the company (fixed salary, variable remuneration at grant value, and selected other benefits such as company cars, pension plans, and one-time payments) by the median annual total remuneration of all employees excluding the highest-paid individual (fixed salary, variable remuneration at grant value, and selected other benefits such as company cars, pension plans, and one-time payments).

## S1-17 – Incidents, complaints and severe human rights impacts

In the 2025 reporting year, work-related incidents and complaints involving the company's own workforce were systematically recorded, assessed, and, where necessary, addressed. Reporting is conducted in accordance with the requirements of ESRS S1-17 and includes the disclosure of incidents of discrimination, complaints received through grievance channels and identified serious human rights violations. In addition, significant fines, sanctions, or compensation payments are disclosed and linked to the corresponding disclosures in the consolidated financial statements.

Data collection is based on Group-wide harmonized processes for reporting, documenting, and handling incidents. Employees can address potential violations or complaints through multiple channels, through managers, Human Resources, Compliance, workers' representatives, or a Group-wide whistleblower system that also allows for anonymous reports. All reports are documented in a central system, classified according to uniform criteria, and assessed in terms of severity, nature of the incident, and potential impact. Data aggregation and quality assurance were performed by the responsible control functions.

No incidents of discrimination or harassment were recorded in the reporting year. All reports received during the reporting period and classified accordingly are relevant

here, regardless of whether the facts were ultimately confirmed or not.

In addition, complaints were recorded that were submitted via formalized grievance channels and concern work-related issues within the meaning of ESRS S1. These include reports submitted via the whistleblower system as well as other structured complaint mechanisms. Complaints that have already been identified as incidents of discrimination are not counted again to avoid double counting. Where applicable, complaints submitted to national contact points within the meaning of the OECD Guidelines would also be considered; there were no such cases in the reporting year.

No serious human rights incidents related to forced labour, trafficking in human beings, or child labour were identified in the reporting year. The prevention of such incidents is embedded in Group-wide guidelines and control processes. These include, in particular, the code of conduct, regulations on compliance with labor law standards, and supplier evaluation processes. Business operations are concentrated at locations within the European Union, which is why the risk of serious violations within the Group's own operations is assessed as low.

During the reporting year, no fines, sanctions, or compensation payments were imposed in connection with serious human rights incidents.

Overall, the analysis of incidents and complaints shows that existing prevention, reporting, and monitoring mechanisms are effective in identifying potential issues at an early stage and addressing them appropriately. The ongoing review and refinement of these mechanisms are integral to compliance, human resources, and risk management.

### Objectives

The provisions in Standard S1-3 apply here accordingly.

**Cases of Discrimination and Complaints**

	Total
Total number of incidents of discrimination, including harassment, reported in the reporting period	0
Total number of other complaints regarding the working environment submitted through channels that allow individuals within the company's own workforce to express concerns	0
Total number of complaints submitted to the OECD National Contact Points for Multinational Enterprises	0
Total amount of significant fines and damages paid in connection with the incidents and complaints described above	0

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# Corporate governance information

## G1-1 – Corporate culture and corporate governance concepts

### Policies regarding corporate governance and the promotion of corporate culture

The flatexDEGIRO Group's corporate policy is anchored in a comprehensive governance and compliance framework, the core of which is formed by the Group-wide code of conduct and the associated guidelines. The Code defines binding principles for all Group companies regarding integrity, transparency, conflicts of interest, anti-corruption, anti-money laundering prevention, data protection, handling of company assets, environment and safety, diversity, human rights, and whistleblowing. These principles are specified in updated guidelines and work instructions and form the normative basis of the corporate culture.

In addition, flatexDEGIRO has implemented specific Group guidelines on the following aspects, among others:

- Anti-corruption and anti-bribery guidelines that clearly define that any form of improper influence or granting of benefits is prohibited and subject to strict escalation and approval processes.
- Anti-money laundering and fraud prevention guidelines that systematically operationalize the requirements of the Money Laundering Act, the German Banking Act, and relevant EU regulations for flatexDEGIRO's business model.
- A group-wide Whistleblower Policy that defines internal reporting offices, external reporting channels, procedural rules, and the protection of whistleblowers.
- Guidelines on the management of conflicts of interest, supplier relationships, and the assessment of business partners, including a Business Partner Code of Conduct.

The corporate culture is focused on responsible corporate governance, regulatory compliance, customer orientation, and sustainable value creation. flatexDEGIRO views sustainability as a long-term value driver and explicitly embeds the commitment to responsible corporate governance in its corporate identity and in its adherence to

the United Nations Global Compact, including the anti-corruption principle enshrined therein.

These strategies cover the aspects of business conduct described in ESRS G1-1, paragraph 7, and simultaneously form the framework for promoting a values-based corporate culture.

### Establishment, Development, Promotion, and Evaluation of Corporate Culture

The corporate culture of the flatexDEGIRO Group is defined by the Management Board and is bindingly practiced in all Group companies. The code of conduct serves as the concrete expression of this culture in the form of specific behavioral requirements that apply to all employees and may result in consequences under labor law in the event of violations.

To develop and promote the corporate culture, flatexDEGIRO uses several management tools:

- The integration of ethical and compliance-related requirements (see S1-1 – Policies related to the own workforce) into HR processes such as hiring, onboarding, annual goal-setting, performance evaluation, and professional development.
- A broad range of training opportunities, including a systematic compliance training program on anti-corruption, anti-money laundering prevention, data protection, IT security, occupational safety, and human rights, which is regularly provided to all employees.
- The implementation of a group-wide HR management system that facilitates the consistent application of cultural and leadership standards.

The corporate culture is assessed using qualitative and quantitative indicators. These include, among other things, participation rates in compliance training, results of employee surveys, use of the whistleblower system, the number of confirmed compliance incidents, and key performance indicators from the internal control system. For 2025, for example, it was determined that no suspected cases of corruption, discrimination, or other compliance violations were reported through the whistleblower system.

### **Mechanisms for identifying, reporting, and investigating concerns regarding conduct that violates the law or the Code of Conduct**

flatexDEGIRO has established a multi-tiered system for identifying, reporting, and investigating concerns related to potential legal violations or breaches of the code of conduct.

Employees are encouraged to first contact their manager or the Compliance Office if they have questions or suspicions. In parallel, a group-wide whistleblower system is available that allows for both internal and external reports. This system is based on a group-wide policy that details the objectives, scope, internal reporting offices, procedural rules, confidentiality, data protection, and protection against retaliation.

Reports can be submitted in writing by mail, via email, by phone, or, upon request, in person to designated compliance officers and the anti-money laundering officer. The internal reporting office acknowledges receipt within seven days, documents all reports confidentially in a central system, and keeps the whistleblower informed of key procedural steps.

Investigations of reports are conducted by the relevant compliance departments, supported by other functions such as Legal, internal audit, or HR, depending on the nature and severity of the matter. The results are documented and, in the case of significant matters, reported to the Management Board and, where appropriate, to committees of the Supervisory Board.

### **Strategies for Combating Corruption and Bribery and Their Relationship to International Frameworks**

flatexDEGIRO pursues a clearly defined zero-tolerance strategy toward corruption and bribery. Throughout the Group, bribery and corruption are defined as any attempt to directly or indirectly influence business transactions in an impermissible manner or to gain an unfair advantage, including through money, gifts, invitations, or other benefits.

The anti-corruption strategy is enshrined in various sets of rules. In addition to the code of conduct, there are specific guidelines on anti-corruption, gifts and invitations, and the prevention and handling of conflicts of interest. These guidelines require all employees and managers to comply with local and international laws on combating corruption

and bribery and are based on internationally recognized standards, including the principles formulated under the United Nations Global Compact and the fundamental principles of relevant international conventions.

The company views its group-wide strategies for combating corruption and bribery as consistent with the objectives of international anti-corruption instruments. There is no deliberate deviation from their objectives. Should the need for adjustment arise in the course of regulatory developments, the relevant guidelines will be updated as part of regular reviews.

The status of the anti-corruption strategy is continuously monitored through training levels, controls, audit findings, and any incidents. No suspected cases of corruption were reported via the whistleblower system for the year 2024. This historical reference serves as a starting point for further monitoring in the 2025 reporting year.

### **Protection of whistleblowers, including internal reporting channels and protection against retaliation**

flatexDEGIRO has established a group-wide framework for the protection of whistleblowers, which is directly based on the EU Whistleblower Directive and its implementation in the national legal systems relevant to the Group.

The flatexDEGIRO Group's Whistleblower Policy specifies in detail:

- the scope of the whistleblower system, including employee groups and types of reportable violations
- the internal reporting channels (postal addresses, dedicated email addresses, telephone contacts, and in-person discussions with designated individuals in the Compliance and AML units)
- the option of anonymous reports via physical mail or external email addresses
- the confidentiality of the identity of whistleblowers and affected individuals
- protection against retaliation, including the presumption that professional disadvantages following a report constitute retaliation, unless proven otherwise.

The internal reporting channels are operated by compliance specialists who are obligated to treat reports confidentially. All reports are documented, stored in a secure system, and

deleted upon completion of the process in compliance with legal retention requirements.

Retaliatory measures against whistleblowers, such as transfer, termination, discrimination, or other forms of disadvantage, are expressly prohibited. Violations of the prohibition against retaliation are considered serious compliance violations and may result in disciplinary action.

#### **Indication of whether strategies for the protection of whistleblowers exist, and handling of relevant legal requirements**

flatexDEGIRO has a group-wide, documented, and published Whistleblower Policy that bindingly governs the whistleblower system and whistleblower protection. The policy is explicitly based on Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, as well as on the national implementing laws in Germany, Bulgaria, the Netherlands, and Austria.

flatexDEGIRO is therefore subject to legal requirements for the protection of whistleblowers, which are reflected in the policy. The company complies with the exemptions provided for in ESRS G1-1, paragraph 11, by disclosing that the whistleblower regulations are based on these legal foundations and address their requirements.

Should more extensive national obligations exist in individual countries, the group-wide system will be adapted accordingly. The MaRisk Compliance function is expressly tasked with continuously monitoring the system's alignment with the legal framework and making any necessary adjustments.

#### **Procedures for the prompt, independent, and objective investigation of incidents related to corporate policy**

flatexDEGIRO has established clear procedural rules for investigating reports and incidents relating to the whistleblower system, allegations of corruption and fraud, suspected money laundering, and other violations of corporate policy.

Upon receipt of a report, the internal reporting office conducts an initial plausibility check. If there is sufficient initial suspicion, an investigation process is initiated, which includes the following elements:

- Assignment of the case to qualified compliance and subject matter experts while maintaining confidentiality
- Involvement of other functions such as internal audit, the Legal Department, or HR as needed
- Structured collection, documentation, and analysis of relevant information
- Assessment of the facts in light of legal, regulatory, and internal obligations and company policy.

The investigative powers are structured such that the units entrusted with handling the matter are organizationally separated from the operational line. The Compliance and AML functions, as well as internal audit, operate independently and report directly to the Management Board and, through its reports, indirectly to the Supervisory Board.

The results of investigations are documented, recorded in a central registry, and form the basis for any employment-law, organizational, or technical measures. The procedures ensure objective and prompt handling in accordance with the ESRS requirements set forth in paragraph 10(e).

#### **Strategy for Internal Training on Corporate Policy**

flatexDEGIRO maintains a comprehensive training program on corporate policy aimed at sustainably embedding ethical and compliant behavior within the organization.

The training strategy includes:

- mandatory basic training for all employees on the code of conduct, anti-corruption, anti-money laundering prevention, data protection, IT security, occupational safety, and human rights
- In-depth specialized training for particularly high-risk functions such as sales, trading, treasury, compliance, AML, and management roles
- Regular refresher training sessions, at least once a year, as well as ad hoc training sessions tailored to specific needs in response to regulatory changes or following relevant incidents
- Training for members of the Management Board and Supervisory Board on governance and compliance topics, particularly regarding anti-corruption.

Training is primarily conducted via e-learning platforms and digital formats and supplemented by in-person sessions when the complexity of the subject matter or the target

audience requires it. Participation rates, test results, and feedback are systematically recorded and analyzed.

### **Functions within the company that are most at risk with regard to corruption and bribery**

flatexDEGIRO identifies functions-at-risk based on a group-wide risk analysis that takes into account the nature, scope, and complexity of business activities, the regulatory environment, the nature of customer relationships, and geographical aspects.

Functions with an increased risk of corruption and bribery include, in particular:

- Functions with direct customer contact and decision-making authority, such as sales units that negotiate terms and initiate business transactions
- Divisions responsible for the selection and management of suppliers and service providers, particularly procurement and vendor management
- Functions with access to confidential information, pricing, or trading processes
- Management and executive levels that make significant business decisions or engage business partners
- Compliance, AML, and fraud prevention functions that handle sensitive matters and may be exposed to an increased risk of improper influence.

These functions are specifically addressed through tailored training programs, stricter control mechanisms, the four-eyes principle, escalation and approval processes, as well as oversight by the compliance and AML functions.

### **Reference to legal requirements for the protection of whistleblowers**

flatexDEGIRO is subject to the national implementing laws of the EU Whistleblower Directive in Germany, Bulgaria, the Netherlands, and Austria. The group-wide Whistleblower Policy explicitly clarifies that the design of the system is based on these legal foundations and aims to uniformly meet the legal requirements in all relevant jurisdictions.

The non-financial report and the Group's internal regulations make it clear that the protection mechanisms of the whistleblower system, in particular confidentiality, anonymity, and the prohibition of retaliation, refer to this legal framework. This allows flatexDEGIRO to utilize the

option provided for in ESRS G1-1, paragraph 11, to document compliance with the requirements regarding the protection of whistleblowers by referring to the relevant national laws.

## **G1-3 – Prevention and detection of corruption and bribery**

### **Description of procedures for preventing, detecting, and combating corruption or bribery**

flatexDEGIRO has established an integrated system of policies, controls, and processes designed to prevent, detect, and combat corruption and bribery. This system includes, in particular:

- a binding code of conduct with explicit anti-corruption provisions, supplemented by specialized anti-corruption guidelines
- Guidelines on gifts and invitations, including value limits, documentation requirements, and approval procedures
- Rules for handling conflicts of interest, including reporting obligations, documentation, and an escalation path to Compliance
- systematic monitoring and reporting of compliance risks and violations
- Integrity checks for new hires, particularly for high-risk positions.

These prevention and detection procedures are continuously reviewed and adapted to regulatory changes as needed. Their effectiveness is assessed through internal controls, internal audit reviews, and external audits.

### **Separation of the investigative function from the management chain**

The handling and investigation of suspected cases of corruption and bribery are the responsibility of independent compliance and AML departments as well as the internal audit function. These units are organizationally separated from the operational management chain and report directly to the Management Board or to the governance bodies responsible.

Internal Audit operates independently of the areas it audits and establishes its audit plans on a risk-based basis. Compliance and AML are structured as a second line of

defense, which plays a leading role not in operational business decisions, but in the design and monitoring of rules and controls. This ensures the organizational separation of the investigative function from the management chain involved in the matter, as required by ESRS G1-3, paragraph 18(b).

#### **Procedures for reporting investigation results to administrative, management and supervisory bodies**

Significant findings from investigations into suspected cases of corruption and bribery, as well as other serious compliance incidents, are reported to the Management Board. Reporting takes place via regular compliance and AML reports, as well as on an ad hoc basis for serious or potentially reportable incidents.

The Management Board informs the Risk and Audit Committee and the Supervisory Board of serious findings, measures taken, and any consequential risks. This reporting is enshrined in the rules of procedure of the governing bodies and in the rules of procedure of the compliance and risk functions.

This adequately fulfills the procedure required by ESRS G1-3, paragraph 18(c), for communicating the results of investigations to the administrative, management and supervisory bodies.

#### **Communication of Anti-Corruption and Anti-Bribery Strategies**

The strategies and guidelines for combating corruption and bribery are communicated Group-wide through multiple channels:

- Publication of the relevant guidelines and the code of conduct in the internal policy management system and on the intranet
- Mandatory training and e-learning courses for all employees, including assessment components
- Target-group-specific training and informational events for high-risk areas
- Regular communication by the Compliance Office and senior management, for example through management updates, town hall meetings, internal newsletters, and management circulars.

These communication measures ensure that the strategies are accessible to all relevant target groups and that their content is understood.

#### **Nature, scope, and depth of training programs to combat corruption and bribery**

flatexDEGIRO offers a structured training program to combat corruption and bribery. This program includes:

- Basic training on the Code and anti-corruption for all employees
- In-depth training on specific corruption risks, civil and criminal consequences, internal reporting channels, and case studies
- Training for managers on their role as role models, their escalation obligations, and their responsibility to ensure a corruption-free environment
- specific training for AML, compliance, fraud prevention, and other functions-at-risk, with a focus on identifying, assessing, and handling suspicious activities.

The training programs combine legal fundamentals with operational regulations and practical case studies and are regularly updated.

#### **Percentage of training coverage for functions-at-risk**

For the 2025 reporting year, the report will include the metrics required by ESRS regarding the percentage of functions-at-risk covered by anti-corruption training programs.

The metric is reported as follows:

- Number of employees in functions-at-risk: 35
- Number of employees in these roles who participated in at least one effective anti-corruption training session during the reporting year: 35
- Percentage of trained employees in functions-at-risk: 100%

The actual figures are determined as part of the internal training monitoring process and are continuously checked for completeness and consistency prior to publication.

### Training of Members of the Administrative, Management, and Supervisory Bodies

Members of the Management Board and Supervisory Board are included in the training programs for combating corruption and bribery. For the 2024 fiscal year, it is documented that all members of the Management Board and Supervisory Board have completed the relevant training. For the 2025 reporting year, this level of training will be continued and supplemented with new content as needed, for example considering changed regulatory expectations or specific risk priorities.

The 2025 report will include qualitative information on the scope and focus of the training as well as quantitative data on the participation rate of board members.

## G1-4 – Incidents of corruption or bribery

### Information on cases of corruption or bribery and their outcomes

flatexDEGIRO reports on any cases of corruption and bribery that occurred during the reporting period, where relevant. The aim of this reporting is to ensure transparency regarding such cases and the measures taken in response.

Data is collected group-wide via the compliance management system, the whistleblower hotline, internal audit, and the HR function. Confirmed cases related to allegations of corruption or bribery, employment-law measures, impacts on business relationships, and relevant regulatory proceedings are recorded.

For the 2025 non-financial report, the information from the internal case statistics will be consolidated, quality-assured, and disclosed in accordance with ESRS G1-4.

### Number of convictions and amount of fines for violations of anti-corruption and anti-bribery regulations

In the 2025 reporting year, flatexDEGIRO will present the mandatory disclosures required under ESRS G1-4, paragraph 24(a), in tabular form as follows:

### Incidents and outcomes in the reporting year

Country / Jurisdiction	Number of final convictions	Amount of fines imposed in EUR
Germany	0	0
Netherlands	0	0
Austria	0	0
Bulgaria	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

In the 2025 reporting year, there were no convictions or fines imposed on flatexDEGIRO for violations of anti-corruption and anti-bribery regulations.

### Measures for Addressing Violations of Procedures and Standards for Combating Corruption and Bribery

If violations of procedures and standards for combating corruption and bribery are identified, the following measures, depending on the severity and legal assessment, are applied in particular:

- employment-law measures (e.g., warning, transfer, termination) up to disciplinary sanctions,
- organizational and technical measures (e.g., adjustment of controls, four-eyes principle, approval and documentation processes),
- escalation and reporting to the Management Board and, depending on relevance, to the relevant committees of the Supervisory Board,
- reviewing/terminating business relationships with third parties and asserting contractual rights (including claims for damages),
- where applicable, initiation or support of regulatory proceedings and cooperation with authorities,
- Targeted audits by internal audit.

Disclosure is qualitative and, to the extent possible, quantitative, specifying the number of relevant cases or measures, without compromising personal data or ongoing proceedings. In the 2025 reporting year, there were no relevant cases or measures.

# Imprint

# Legal Notice

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## **Further information**

Further information is available on the company website [flatexdegiro.com](http://flatexdegiro.com).

The website provides information on the share, news with current announcements, company reports and interim reports, the financial calendar and presentations. On this website further service offers can be obtained.

The reports are available in German and English. The German version is binding. For sustainability reasons, the annual and interim reports are not printed. All annual and interim reports are available to download online as PDF files.