



**2025 SUPPLEMENTARY
SUSTAINABILITY DISCLOSURE**

2025 Supplementary Sustainability Disclosure

This document constitutes a supplementary disclosure to the sustainability information included in the Consolidated Sustainability Reporting 2025, which forms part of the Consolidated Management Report contained in the “Accounts and Reports 2025” document and has been prepared in accordance with the Corporate Sustainability Reporting Standards (ESRS) pursuant to Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive, CSRD).

The purpose of this 2025 Supplementary Sustainability Disclosure is to support the completeness and transparency of ESG reporting. The information and data presented provide tangible evidence of the Fineco Group’s contribution to sustainable development, generating a positive impact on society and the environment and clearly illustrating the Group’s approach to sustainability.

This document complements the Consolidated Sustainability Reporting 2025 and other institutional publications, such as the FinecoBank Responsible Banking Progress Statement, the Environmental Statement, and the FinecoBank Group Pillar III disclosure, by integrating information not included in those reports and avoiding unnecessary duplication. The 2025 Supplementary Sustainability Disclosure was approved by the Board of Directors of FinecoBank on 3 March 2026 and subsequently published on the website www.finecobank.it, within the “Sustainability” section.

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1. GOVERNANCE INFORMATION

1.1 Participation in Trade Associations

Fineco's commitment is also reflected in its collaborative relationships with leading entities and institutions operating in the financial sector. In 2025, a total of €988,753¹ was paid in membership contributions.

Fineco maintains strong, trust-based relationships with key financial institutions and associations, including:

- ABI – Italian Banking Association²: industry association aimed at protecting the interests of banks by organizing studies and debates on particular topics and providing assistance and information.
- AIAF – (Associazione Italiana per l'Analisi Finanziaria- Italian Association for Financial Analysis): non-profit association aimed, inter alia, at defining standards in financial analysis and monitoring their correct use, promoting and disseminating the study, culture and education for financial analysis.
- Assiom Forex: international financial association that promotes training and the dissemination of technical information and market practices, contributing to the development and integrity of European and international financial markets.
- AssoAML: Italian association that aims to establish the first and only reference hub for obliged entities and experts in anti-money laundering and counter-terrorism financing regulation.
- Assogestioni: Italian association of asset managers, representing major Italian and foreign asset management companies operating in Italy, as well as banks and insurance companies active in asset management and supplementary pension schemes.
- Assonime: Italian association of Italian joint-stock companies that addresses issues related to the interests and development of the Italian economy. It provides members with tools to navigate a complex regulatory environment through studies, research, analyses, opinions, and dedicated advisory services.
- Assoreti: association of banks and investment firms providing investment advisory services, focused on monitoring regulatory developments, maintaining dialogue with institutions, and promoting studies, publications, conferences, and other initiatives.
- AMF (formerly Assosim): one of the main trade associations representing Italian financial intermediaries, engaged in research and training activities and representing members in consultations launched by national and international supervisory authorities on regulatory and financial matters.
- Associazione italiana Private banking (Italian Private Banking Association): representing companies operating in the Italian private banking industry, serving as a platform for aggregation, knowledge-sharing, and development of private-banking culture.
- CBI: the association for interbank corporate banking, providing a wide range of financial, informational, and commercial services through a unified communication standard and a cooperative model among banks without limiting competitive dynamics.

¹ The five main entities/associations with voluntary membership to which membership contributions were paid in 2025 are: ABI (€342,760); Assoreti (€138,930); Italian Private Banking Association (€58,002); Assonime (€35,710); Assogestioni (€30,000).

² Fineco participates in 67 ABI working groups and committees dedicated to in-depth analysis of numerous topics across various areas, including compliance, legal affairs, finance, credit, payment methods, digital identity, and risk management. Among the most relevant sustainability-related topics, the Bank takes part in the following working groups: “Comitato Tecnico Strategico ESG”; “Attività bancaria, ambiente e cambiamenti climatici”; “Consumer bank, inclusione finanziaria e sociale e educazione finanziaria e al risparmio”; “Investimenti sostenibili”; “Rendicontazione di Sostenibilità” and “Carta delle donne”.

- Conciliatore Bancario Finanziario (banking and Financial Arbitrator): non-profit association specialized in banking, financial, and corporate dispute resolution.
- FEDUF (Fondazione per l'Educazione Finanziaria e al Risparmio - Foundation for Financial Education and Savings): established by the Italian Banking Association, a private non-profit entity promoting financial education within the broader concept of conscious and active economic citizenship, fostering financial and economic literacy.
- Interbank Deposit Protection Fund (FITD): a mandatory consortium recognized by the Bank of Italy that protects eligible deposits in the event of bank default. The Bank also participates in the Voluntary Scheme of the FITD.
- Fondo Nazionale di Garanzia (National Guarantee Fund): a fund joined by financial intermediaries, aimed at providing compensation to investors who are clients of participating entities (banks, investment firms, asset managers) in cases of compulsory administrative liquidation, bankruptcy, or composition with creditors.
- PRI.Banks: association of Italian Private Banks, serving as a reference point for banking institutions with solid ownership structures, often characterized by family and managerial governance.
- UPA – Utenti Pubblicità Associati: association bringing together major industrial, commercial, and service companies that invest in advertising and communication to promote their products and services.
- Valore D: an association of companies in Italy committed to gender balance and inclusive culture within organizations and the country. Through this partnership, Fineco participates in dedicated training programs aimed at promoting female talent within the company.

Finally, no contributions were made for lobbying³ activities, nor for local, regional, or national political campaigns, nor to political organizations or candidates, as expressly prohibited by the Anti-Corruption Global Policy.

1.2 Tax Strategy

The primary objective pursued by the Group is to ensure proper management of tax matters, recognizing that the proper fulfilment of tax obligations represents an important component of the broader economic and social role it plays in the countries where it operates. In this regard, Fineco is committed to paying all taxes due and promptly fulfilling all obligations required by national and international tax regulations. At the same time, the Group strives to ensure an efficient tax structure, preventing instances of double taxation and pursuing a reduction of the overall tax burden solely where legitimately permitted, in full compliance with the provisions governing transfer pricing for intra-group transactions.

The relationship with tax authorities is based on the highest standards of cooperation and transparency. Since 2016, Fineco has adhered to the optional regime known as Cooperative Compliance (*“Adempimento Collaborativo”*) pursuant to Legislative Decree No. 128/2015, which aims to foster a trust-based relationship between the tax administration and the taxpayer, ensuring greater certainty on significant tax matters and reducing the risk of disputes. This objective is achieved through continuous and proactive dialogue with the tax authority and

³ The set of activities aimed at influencing public-sector decision-making, through direct or indirect interactions, in pursuit of specific interests.

through the ongoing strengthening of the internal tax risk control system (Tax Control Framework, or TCF), integrated within the corporate governance structure.

The information relating to the Italian parent company and the Irish subsidiary Fineco Asset Management DAC is as follows.

Country-by-Country Reporting 2025 (GRI 207-4)	Italy	Ireland
Name of resident entities	Fineco Bank S.p.A.	Fineco Asset Management DAC
Primary activities of the organization	Regulated financial services	
No. Employees as of 31/12 (Head Count)	1,435	94
Revenues from third party sales (€/000)	1,650,233	427,756
Revenues from intra-group transactions with other tax jurisdictions (€/000)	215,872	0
Profit/Loss before tax (€/000)	908,113	157,106
Tangible assets other than cash and cash equivalents (€/000)	151,212	823
Corporate income tax paid on a cash basis (€/000)	259,970	19,962
Corporate income tax accrued on profits/losses (€/000)	237,635	23,537

With regard to the difference between taxes paid on a cash basis and taxes accrued, please note the following:

- Fineco Bank S.p.A.: the taxes paid exceed the amounts accrued due to the timing of advance and final payments, as well as the effect of tax incentives (Patent Box), which reduce current taxes without generating deferred tax offsets (excluded from the report).
- Fineco Asset Management DAC: the gap is mainly attributable to the timing of Pillar Two payments, which follow the accruals, and to the increase in profits.

In line with the definition of tax risk, Fineco is committed to refraining from using low-tax jurisdictions for tax avoidance purposes and from engaging in transactions that artificially shift value to non-cooperative jurisdictions.

Specifically, as outlined in the *Global Policy on Business with Non-Cooperative Jurisdictions*, Fineco undertakes to:

- maintain full awareness of national and international regulations (e.g., OECD, EU, Controlled Foreign Companies – CFC, etc.) relating to non-cooperative jurisdictions (Black-Listed Jurisdictions).
- adopt sustainable solutions in relation to its financial, investment and client advisory activities, with particular attention to the reputational implications associated with tax matters.
- develop and maintain a correct and transparent cooperative relationship with the tax authorities of the countries in which the Group operates.

1.3 Business conduct and ethics

The Group has implemented a solid governance system designed to monitor and prevent breaches of the Code of Conduct, through specific safeguards and controls for each critical area. In the event of breaches, the most appropriate measures are assessed to prevent similar incidents from recurring, involving the relevant functions.

During 2025, no breaches were identified in the areas of Discrimination and Harassment, Conflicts of Interest relating to the regulation on related parties and connected subjects, or Insider Trading. With regard to Customer Data Privacy: with 1,800,047 clients at the end of 2025, 50 breaches were recorded involving customer data leaks, thefts or losses.

In the areas of Anti-Corruption and Anti-Money Laundering, no breaches occurred, and during 2025 the Group did not pay any monetary penalties nor was it convicted for cases of active or passive corruption.

Furthermore, in the field of anti-corruption, the Bank regularly carries out “Tone from the Top” initiatives. In 2025, the focus was placed on corporate gifts and hospitality. The Fineco Group recognizes that offering gifts as a gesture of esteem, appreciation or gratitude is a normal and legitimate aspect of business relationships and allows such gifts to be given or received — only if of modest value and courtesy — provided that the requirements set out in internal regulations are met and the Bank’s registration and authorization procedure is followed. Gifts and corporate hospitality must never be perceived as an improper influence, nor should they affect the recipient’s objectivity when making business decisions or other types of decisions, such as approving a donation.

As part of the “Tone from the Top” approach, initiatives relating to sustainability were also carried out, with the aim of making it an integral part of the corporate culture.

1.4 Privacy

For the Fineco Group, safeguarding the personal data of data subjects is a fundamental priority aimed at preventing undue interference by third parties in their private sphere. To this end, the Group has adopted a structured information-protection system, including measures dedicated to the protection of personal data provided by data subjects.

In a spirit of full transparency, the Group provides specific informational tools — such as privacy notices — enabling data subjects to understand the purposes, methods and rights associated with the processing activities carried out by the Data Controller.

The processing activities performed by the Group’s companies are disclosed to data subjects in accordance with Regulation (EU) 2016/679 (GDPR), specifying for each processing activity:

- the purpose;
- the legal basis;
- any transfers to third countries;
- the nature and characteristics of the activities performed.

Data subjects have access to a dedicated contact point with both the Data Controller and the Data Protection Officer (DPO), ensuring compliance and timely handling of all requests received. For any matter concerning their personal data, data subjects may contact Customer Care and/or submit a complaint or request to the Bank; all reports are in any case reviewed by the DPO function.

The data-protection management model may be subject to verification by the Internal Control Functions. In particular, the Compliance Department performs ex-post controls to verify the application of internal rules and the effectiveness of the safeguards adopted to prevent or mitigate potential non-compliance. For each area under supervision, including privacy, the main regulatory requirements are identified and associated with corresponding risk levels, defined by comparing predefined indicators with reference thresholds.

The Bank has also implemented a specific procedure for managing data breaches, which requires reporting detected violations — whether identified internally or by external parties, including customers — to the competent function within the Compliance Department.

1.5 Skills and Training in Management, Supervisory and Control Bodies

In addition to complying with applicable legal and regulatory requirements, the corporate governance system adopted by FinecoBank incorporates the recommendations of the Corporate Governance Code for Listed Companies, which sets out the fundamental standards for management based on transparency, accountability and a long-term perspective, with particular attention to the sustainable success of the Company.

The Bank adopts a traditional administration and control model, characterized by the presence of two bodies appointed by the Shareholders' Meeting: the Board of Directors, responsible for strategic supervision, and the Board of Statutory Auditors, responsible for oversight and control. In 2025, the Board of Directors participated in dedicated training sessions as part of the broader induction program approved by the Board of Directors, which for the year included a total of seven meetings, held with the support of the Bank's internal structures or external consultants. Members of the Board of Statutory Auditors also took part in these sessions.

Among the topics addressed in 2025, two training sessions included in-depth analyses on cybersecurity. Specifically, these were covered during the sessions on "*Tech Strategy*" and on the "*Impact of new regulations (AML, Anti-corruption, DORA, etc.) and new guidelines (EBA et al.) on the business and the risk framework*".

The training plan for the 2023–2025 term also included, in continuity with previous years, sessions dedicated to ESG matters, in line with the mapping of the topics considered most relevant for the corporate officers.

To ensure constant information flows between corporate bodies, at each meeting of the Board of Directors a dedicated update on ESG topics is provided by the Chair of the Corporate Governance and Environmental and Social Sustainability Committee, based on the issues discussed during the Committee's meetings held prior to the Board sessions.

Induction session	Date
1. Processes of Data Governance	April 2025
2. ESG & ECB Thematic Review (Positioning, Agenda, Intersection with the Risk Framework)	July 2025
3. Impact of new technologies on business, offering and service models, user experience and competitive dynamics – session one	July 2025
4. New asset classes and impacts on offering and market dynamics	October 2025
5. Tech Strategy	November 2025
6. Impact of geopolitical scenarios and cyclical tensions on markets and business	December 2025
7. Impact of new regulations (AML, Anti-corruption, DORA...) and new guidelines (EBA and others) on the business and the risk framework	December 2025

2.COMPANY INFORMATION

2.1 Workforce

In the following pages and tables additional information relating to workforce is presented.

Workforce breakdown (2025)	No. of men	No. of women	No. total	Share of men	Share of women
Executives	39	14	53	73.6%	26.4%
Middle managers	397	188	585	67.9%	32.1%
Professionals areas	447	444	891	50.2%	49.8%
Total	883	646	1,529	57.8%	42.2%

In 2025, the presence of women in the Group's managerial positions achieved the following results across several key areas: women represent 31.7% of all managerial positions⁴, including junior, middle and top management levels

- In junior management positions, meaning the first level of managerial responsibility, the share of women is 32.8%
- considering only revenue-generating functions — therefore excluding support functions such as Human Resources, IT, Legal, etc. — women account for 34.5% of all managerial positions
- in positions related to STEM disciplines (Science, Technology, Engineering and Mathematics), women represent 16.4% of the total.

Total new hires and hiring rate ⁵	2025	
	Total hires	Hiring rate
By gender		
Men	76	9.1%
Women	46	7.5%
Total	122	8.4%
By age group		
<30	58	30.3%
30-50	61	6.9%
>50	3	0.8%
Total	122	8.4%
By employee category		
Executives	2	4.1%
Middle managers	39	7.2%
Professionals areas	81	9.4%
Total	122	8.4%

⁴ All managerial roles, including middle-management levels.

⁵ The hiring rate is calculated as the ratio between the number of new hires during the year and the number of employees at the end of the previous year (by gender, age group and job classification). In addition, a quarterly analysis of the workforce composition is carried out, with further insights relating to the hiring rate — broken down by gender, age, job category and organizational unit — and the turnover rate, broken down by gender, age, length of service and organizational unit.

Total terminations and total turnover rate ⁶	2025	
	Total terminations	Total turnover rate
By gender		
Men	29	3.5%
Women	15	2.4%
Total	44	3.0%
By age group		
<30	9	4.7%
30-50	23	2.6%
>50	12	3.2%
Total	44	3.0%
By employee category		
Executives	3	6.1%
Middle managers	22	4.1%
Professionals areas	19	2.2%
Total	44	3.0%

The employee absenteeism rate is 2.6%⁷, of which 1.9% refers to men and 3.5% to women.

2.2 Working conditions and employee support programs

In Italy, Fineco applies the National Collective Labour Agreement (CLA) of the Italian Banking Sector (ABI), supplemented by second-level agreements negotiated at company level, with the aim of ensuring fair and sustainable working conditions. The CCNL is periodically updated with provisions designed to protect employees' purchasing power, considering the prevailing economic context and inflation trends, in line with the "Framework Agreement on Contractual Arrangements – Rules for a Sustainable Contract" of 24 October 2011 (Appendix 11 of the CCNL dated 23 November 2023).

The ABI CLA serves as the main reference framework for safeguarding workers' rights in the banking sector, defining rules on remuneration, working hours, leave and other contractual conditions. Proper implementation and continuous monitoring of these provisions ensure compliance with principles of fairness and employee well-being.

⁶ The turnover rate is calculated by comparing the number of employees who left the organization during the year with the number of employees at the end of the previous year (by gender, age group and job level). In addition, a quarterly analysis of the workforce composition is carried out, with further insights relating to the hiring rate — detailed by gender, age, job category and organizational unit — and the turnover rate, broken down by gender, age, length of service and organizational unit.

⁷ The absenteeism rate is calculated by measuring the incidence of sick leave (the only type of absence considered significant for this calculation) in relation to the number of hours worked.

As part of its commitment to employee health and well-being, Fineco conducts an annual assessment of Work-Related Stress Risk. The results are communicated to all employees through a dedicated circular and incorporated into the Risk Assessment Document.

With regard to overtime, the applicable regulations set annual limits and provide for additional pay to prevent excessive working hours and protect work-life balance. The Bank has introduced control systems to ensure compliance with these limits, in line with the provisions of the ABI CLA.

The standard weekly working time is 37 hours (reduced to 36 hours for shift workers), while the daily working time is set at 7 hours and 30 minutes, to be scheduled within predefined time bands.

Fineco grants flexible working hours to all employees, except shift workers who follow a specific work-time structure. This measure is granted to part-time employees through a dedicated provision of the Innovation Plan, and to full-time employees under Article 116 of the ABI CLA. In addition, all employees may request a part-time arrangement, in accordance with the applicable CLA. All requests submitted in 2025 were reviewed positively and approved.

The ABI CLA also establishes salary tables for the various professional levels, ensuring that wages are aligned with the cost of living.

2.3 Training and Work Flexibility

Human capital development is a strategic priority for Fineco, and for this reason the Bank promotes comprehensive training plans and programs designed to strengthen each employee's skills and capabilities.

Average hours of training per FTE 2025	
By employee category	
Executives	31.6
Middle managers	36.5
Professionals areas	47.1
Total per FTE	42.5
By gender	
Men	42.4
Women	42.7
Total per FTE	42.5
By age group	
≤ 30	93.2
31-50	39.7
>50	29.7
Total per FTE	42.5

All training programs are offered to all employees (full-time, part-time, permanent and fixed-term), without any distinction.

2.4 Remuneration

In addition to what is already described in the 2025 Remuneration Policy for Identified Staff, both the Head of the Sustainability function and the Energy Manager are also assigned sustainability objectives integrated into both the short-term and long-term incentive systems, with particular focus on climate-related topics.

Within the “Stakeholder Value” objective, specific ESG indicators have been defined, in line with the Group’s 2024–2026 Sustainability Objectives Plan.

Furthermore, the specific “Tone from the Top” objective has been confirmed for 2025 as well, aimed at promoting behavior grounded in integrity and strengthening the culture of compliance within the organization.

2.5 Local Development and Community Support

Fineco’s commitment to the local area and the wider community is expressed through initiatives aimed at promoting culture, enhancing historical and artistic heritage, protecting the environment and supporting local communities. This commitment is implemented through partnerships, charity projects, direct donations and fundraising campaigns activated in response to emergencies.

The selection of beneficiary organizations is governed by the internal regulation “*Management of Charitable Contributions and Donations*”, which sets out the criteria and controls required for the allocation of contributions. To be approved, projects must be promoted by non-profit organizations (such as Third Sector Entities, Foundations, Associations, Religious Institutions, Universities or Public Institutions) operating broadly and continuously across the national territory. In addition, all supported initiatives must be carried out in Italy.

The evaluation process includes the collection of information from the applicant organization, which must provide:

- a presentation of the organization and the proposed initiative
- social objectives, areas of intervention and territorial impact
- needs to be addressed and categories of beneficiaries
- updated bylaws or social report
- documentation proving the signing authority of the Chairperson or Legal Representative (minutes, certifications, self-certifications)
- copy of an identity document
- any additional elements useful for the assessment.

The associations are also required to complete a dedicated questionnaire designed to exclude risks of involvement in corruption-related activities.

The evaluation of sponsorship requests is governed by the internal regulation “*Management of Sponsorships*”, which requires an assessment of the counterparty’s reputational profile and financial soundness. Proposals are selected based on their ability to generate a positive impact on the territory, with specific attention to cities, areas and thematic fields where the initiative can be most effective.

This approach makes it possible to identify targeted interventions that are consistent with the social and cultural needs of different local contexts.

Contributions for the community – 2025	(€)
Charitable donations made by Fineco	561,000
Partnerships for culture and the environment	1,517,561
Funds raised and donated by clients	195,000
Total	2,273,561

3. ENVIRONMENTAL INFORMATION

3.1 Sustainable financing products: green mortgages and loans

The green mortgage allows customers to finance the purchase of properties with an A or B energy rating through a mortgage loan offered at more favorable conditions than the standard terms, thereby promoting the improvement of the Italian real estate stock.

The Green Loan is a personal loan designed to finance the installation of renewable-energy technologies, offered at a more advantageous rate than the standard one. The product features were defined in line with the “*Green Loan Principles. Supporting environmentally sustainable economic activity*” issued by the Loan Market Association and the Asia Pacific Loan Market Association⁸, which state that a loan may be classified as “green” only if the funds are used exclusively to finance (in whole or in part) activities with environmental sustainability characteristics. These characteristics were defined with reference to the EU Environmental Taxonomy (Regulation EU 852/2020) and, in particular, to the technical screening criteria set out in the Delegated Act on climate change mitigation.

At the end of 2025, the outstanding balance of green mortgages and green loans amounted to €218.2m and €2.8m respectively, corresponding to 16.9%⁹ and 0.6% of the relevant total. Overall, sustainable finance credit products (green mortgages and green loans) accounted for 12.6% of total credit products (purchase mortgages and personal loans) at the end of 2025.

3.2 Financed Emissions and financed emission intensity

The relevant asset classes included in the Consolidated Financial Statements for which specific PCAF (Partnership for Carbon Accounting Financial) methodologies for calculating financed emissions are available are the following:

- mortgages
- corporate debt securities issued by banking counterparties
- sovereign debt securities¹⁰

For all three applicable categories, the corresponding GHG emissions have been estimated as follows:

- Emissions associated with mortgages were estimated based on kg CO₂e/m² values for each property, provided by an external data provider.

⁸ Green Loan Principles. Supporting environmentally sustainable economic activity” – Loan Market Association, Asia Pacific Loan Market Association, Loan Syndications & Trading Association, February 2021.

⁹ Only the total amount of purchase mortgages is considered, as green mortgages are aimed exclusively at purchase.

¹⁰ Sovereign issuers include supranational issuers, government agencies and local authorities (sub-sovereign).

- Emissions related to corporate debt securities (issued by banking counterparties) were estimated using: i) the Scope 1 and Scope 2 emissions of the counterparties (sourced from publicly available 2024 reports such as Annual Reports, Sustainability Reports, etc.); and ii) the attribution factor defined by the methodology for measuring financed emissions in the “*Global GHG Accounting & Reporting Standard – Part A: Financed Emissions*” (December 2022) published by PCAF.
- Emissions associated with sovereign debt securities were estimated using the following sources: i) UNFCCC (https://di.unfccc.int/time_series) for country-level CO₂ emissions; and ii) the World Bank database (<https://databank.worldbank.org/>) for GDP values of the same countries or supranational entities. Emissions are estimated net of LULUCF (Land Use, Land-Use Change and Forestry) sector emissions.

Asset class	Financed emissions (tCO₂e¹¹)	Financed emissions intensity (tCO₂e/€ mln asset)
Mortgages	50,009	22
Corporate debt securities	15,978	17
Sovereign debt securities	3,518,835	147
Total	3,584,823	132

¹¹ Reference year for estimated emissions (2024)