FINECO

FINECOBANK GROUP PUBLIC DISCLOSURE – PILLAR III

AS AT 31 MARCH 2026

Contents

"FinecoBank Banca Fineco S.p.A."
in abbreviated form "FinecoBank S.p.A.", or "Banca Fineco S.p.A." or "Fineco Banca S.p.A.".
Bank enrolled in the Register of Banks and Parent Company of the FinecoBank Banking Group – enrolled in the Register of Banking Groups at No. 3015, Member of the National Guarantee Fund and National Interbank Deposit Guarantee Fund.
Tax Code and Milan-Monza-Brianza-Lodi Companies Register no. 01392970404 – R.E.A. (Economic and Administrative Index) no. 1598155, VAT No. 12962340159

Introduction

The Group FinecoBank public disclosure Pillar III – (hereafter “Disclosure”) has been prepared in accordance with the prudential rules for banks and investment firms, which came into force on January 1, 2014 and are contained in Directive 2013/36/EU (Capital Requirements Directive, CRD IV) and in Regulation 575/2013/EU (Capital Requirements Regulation, CRR), and subsequent Directives and Regulations amending its content. In particular, reference is made to Regulation (EU) 2024/1623 and Directive (EU) 2024/1619, which introduced significant amendments to the CRR Regulation and the CRD Directive, applicable from 1 January 2025. In the rest of this document, the term "CRR" refers to Regulation no. 575/2013/EU as subsequently amended, while the term "Directive" refers to the Capital Requirements Directive as subsequently amended.

The Directive and the Regulation transpose into European Union legislation the framework known as Basel III, defined by the Basel Committee on Banking Supervision to strengthen banks' ability to absorb shocks arising from financial and economic tensions, regardless of their origin, to improve risk management and governance of banks, as well as to strengthen their transparency and disclosure.

The CRR requires Institutions to publish the information set out in Title II and III of Part Eight in conjunction with the financial statements. The purpose of this disclosure requirement is to integrate the minimum capital requirements (Pillar 1) and the prudential control process (Pillar 2), by identifying a set of disclosure transparency requirements that allow market participants to have relevant, complete and reliable information about capital adequacy, risk exposure and the general characteristics of the systems in place to identify, measure and manage those risks.

FinecoBank S.p.A. (hereinafter also FinecoBank or Fineco or Bank) qualifies as a "Large Institution" under Part Eight of the CRR and, therefore, all information required to them on a quarterly basis has been published in this Public Disclosure as at 31 March 2026.

In line with the CRR, FinecoBank S.p.A., as the Parent Company of the FinecoBank Banking Group (hereinafter the "Group"), publishes its Public Disclosure at a consolidated level.

With the aim of improving transparency and comparability of information disclosed to the public, through the use of specific IT solutions, structured data exchange formats and automated validation methods that can also ensure greater efficiency in the management and publication of public disclosures, an initiative launched by EBA under the direct mandate of Article 434bis of CRR3, the so-called Pillar 3 Data Hub (P3DH), is being finalized, aimed at centralizing and making available Pillar 3 disclosures through a single electronic access point on the EBA website. According to the timeline reported in the Final Draft ITS (EBA/ITS/2025/01), a gradual transition to this new system is planned, with large institutions (including Fineco) expected to adopt it as of June 30, 2025, the first reference date for P3DH implementation. This transitional period for the reference dates of June 30, September 30, and December 31, 2025, allows institutions to publish their Pillar 3 disclosures on their websites and subsequently comply with the requirement to submit the information to the EBA in the technical format required by ITS. As of 31 March 2026, the initiative is fully operational; therefore, from that date onwards, the reports must instead be submitted first to the EBA, although the EBA has granted banks the option to continue publishing them on their websites as well.

In addition to the European Union regulations before mentioned, there are also the provisions issued by the Bank of Italy, in particular Circular no. 285 "Supervisory provisions for banks" of December 17, 2013 (and subsequent updates), which in Chapter 13 of Part Two (public disclosure) governs the matter. The aforementioned circular does not lay down specific rules for the preparation and publication of Pillar III but refers to the provisions for this purpose provided by CRR, by the Regulations of the European Commission whose preparation may be delegated to the EBA (European Banking Authority) and by the EBA Guidelines.

The subject is therefore directly regulated:

- by the Part Eight of CRR, “Disclosure by institutions” (art. 431 - 455);
- by the Regulations of the European Commission, the preparation of which may be delegated to the EBA, containing the regulatory or implementing technical standards to govern the uniform models for publishing the various types of information. In particular, reference is made to the following guidelines and regulations:
    - Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637 (EBA/ITS/2024/25 transposed by the Implementing Regulation 2024/3172);
    - Commission Implementing Regulation (EU) 2021/763 of 23 April 2021 laying down implementing technical rules for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council and Directive 2014/59/EU of the European Parliament and of the Council (Bank Recovery and Resolution Directive – BRRD) with regard to supervisory reporting and public disclosure of minimum own funds requirement and eligible liabilities (MREL);
    - guidelines on materiality, proprietary and confidentiality and on disclosure frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) No 575/2013 (EBA/GL/2014/14).

Please note that the disclosure of the Group is prepared in accordance with a formal policy (Internal Regulation) adopted in the application of the CRR Article 431 (3) that sets out the internal controls and procedures.

The key elements of this policy are:

- identification of roles and responsibilities of the corporate bodies, departments and Legal Entities involved in the process of producing the disclosure;
- identification of the information to be published (in accordance with EBA GL/2014/14 and CRR Article 432 and 433 in relation with the requirements applicable as of 31 March 2026);
- approval by the Board of Directors;

- publication on the disclosure. In line with the aforementioned P3DH, the Disclosure as of March 31, 2026, will first be submitted to the EBA in electronic format in accordance with the deadlines set out in the regulations and will be subsequently made available on the FinecoBank website.

This document has been prepared in accordance with the indications of the EBA guidelines in compliance with the proportionality principle and publishing only information that is material and not exclusive or confidential in accordance with Article 432 of the CRR. In this regard, it should be noted that for the publication of qualitative and quantitative information, FinecoBank has adopted, firstly, the models provided by the EU Regulations or by the applicable EBA Guidelines mentioned above, secondly, free models. The tables below report references to the location, in this document, of the required information.

Any discrepancies between data disclosed in this document are due to the effect of rounding. All amounts, unless otherwise specified, are expressed in thousands of euros.

Reference to regulatory reporting requirements on a quarterly basis: Implementing Regulation (EU) 3172/2024

The table below shows the templates required on quarterly basis, applicable to FinecoBank Group. Therefore, the following tables are excluded:

- EU CMS1 and EU CMS2 since the Group does not use internal models to calculate risk-weighted exposure amounts;
- EU CR8 since the Group does not use internal models (IRB) to calculate risk-weighted exposure amounts for credit risk;
- EU CCR7 since the Group does not use internal models (IMM) to calculate risk-weighted exposure amounts for counterparty credit risk;
- EU MR2-B since the Group does not use internal models (IMA) to calculate risk-weighted exposure amounts for market risk;
- EU CVA4 since the Group does not use the standardized model to calculate risk-weighted exposure amounts for credit valuation adjustments.

TABLE	TOPIC	CHAPTER
EU OV1	Overview of total risk exposure amounts	Own funds requirements and risk-weighted exposure amounts
EU KM1	Key metrics	Key metrics
EU LIQ1	Quantitative information of LCR	Liquidity requirements
EU LIQB	Qualitative information on LCR, which complements template EU LIQ1	Liquidity requirements

Reference to the information required by Part Eight of CRR

The table shows the information required, on a quarterly basis, by CRR.

ARTICLE	TOPIC	CHAPTER
438 letters d), da) and h)	Disclosure of own funds requirements and risk-weighted exposure amounts	Own funds requirements and risk-weighted exposure amounts
447	Disclosure of key metrics	Key metrics
451a paragraph 2	Disclosure of liquidity requirements	Liquidity requirements

It should be noted that the information referred to in the sections of the articles listed above for which a quarterly frequency is required to large institutions, as detailed in 433a of the CRR, is subject to publication in this document.

Key metrics

Below is reported the EU KM1 table on key metrics, the details and qualitative information of which are reported within the document, if requested on quarterly basis, in the specific dedicated sections.

The following table EU KM1 reports information required by article 447 letters from a) to g) of CRR, in particular:

- the composition of own funds and own funds requirements;
- the total amount of risk exposure;
- the amount and composition of additional own funds that institutions are required to hold;
- the combined buffer requirement that institutions are required to hold;
- the leverage ratio and exposure measure;
- information in relation to liquidity coverage ratio;
- information in relation to net stable funding requirement.

All minimum requirements applicable to the FinecoBank Group as at 31 March 2026 are met. The calculation of Own Funds, and in particular of CET1 capital as at 31 March 2026, took into account foreseeable dividends and charges for a total amount of 131,269 euro thousand, assuming the conditions of Article 26(2) of the CRR are met.

EU KM1 – Key metrics

(Amounts in € thousand)

		a	b	c	d	e
		03.31.2026	**12.31.2025**	**09.30.2025**	**06.30.2025**	**03.31.2025**
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	1,470,351	1,445,203	1,391,422	1,362,025	1,341,370
2	Tier 1 capital	1,970,351	1,945,203	1,891,422	1,862,025	1,841,370
3	Total capital	1,970,351	1,945,203	1,891,422	1,862,025	1,841,370
	Risk-weighted exposure amounts					
4	Total risk exposure amount	6,299,479	6,201,582	5,814,637	5,805,481	5,590,726
4a	Total risk exposure pre-floor	6,299,479	6,201,582	5,814,637	5,805,481	5,590,726
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	23.34%	23.30%	23.93%	23.46%	23.99%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	23.34%	23.30%	23.93%	23.46%	23.99%
6	Tier 1 ratio (%)	31.28%	31.37%	32.53%	32.07%	32.94%
6b	Tier 1 ratio considering unfloored TREA (%)	31.28%	31.37%	32.53%	32.07%	32.94%
7	Total capital ratio (%)	31.28%	31.37%	32.53%	32.07%	32.94%
7b	Total capital ratio considering unfloored TREA (%)	31.28%	31.37%	32.53%	32.07%	32.94%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.00%	2.00%	2.00%	2.00%	2.00%
EU 7e	*of which: to be made up of CET1 capital (percentage points)*	*1.13%*	*1.13%*	*1.13%*	*1.13%*	*1.13%*
EU 7f	*of which: to be made up of Tier 1 capital (percentage points)*	*1.50%*	*1.50%*	*1.50%*	*1.50%*	*1.50%*
EU 7g	Total SREP own funds requirements (%)	10.00%	10.00%	10.00%	10.00%	10.00%
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	0.15%	0.15%	0.14%	0.14%	0.13%
EU 9a	Systemic risk buffer (%)	0.38%	0.38%	0.40%	0.41%	0.21%
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	-	-	-	-	-
11	Combined buffer requirement (%)	3.03%	3.03%	3.04%	3.05%	2.84%
EU 11a	Overall capital requirements (%)	13.03%	13.03%	13.04%	13.05%	12.84%
12	CET1 available after meeting the total SREP own funds requirements (%)	17.71%	17.67%	18.30%	17.83%	18.36%

continued EU KM1 – Key metrics

(Amounts in € thousand)

		a	b	c	d	e
		03.31.2026	12.31.2025	09.30.2025	06.30.2025	03.31.2025
	Leverage ratio					
13	Total exposure measure	38,326,346	38,355,223	37,032,524	35,812,644	34,460,784
14	Leverage ratio (%)	5.14%	5.07%	5.11%	5.20%	5.34%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
EU 14b	*of which: to be made up of CET1 capital (percentage points)*	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	24,508,340	24,064,395	23,567,530	22,873,792	22,118,611
EU 16a	Cash outflows - Total weighted value	3,889,014	3,885,782	3,883,046	3,818,173	3,792,887
EU 16b	Cash inflows - Total weighted value	1,371,901	1,368,347	1,347,830	1,306,074	1,295,140
16	Total net cash outflows (adjusted value)	2,517,113	2,517,435	2,535,217	2,512,099	2,497,748
17	Liquidity coverage ratio (%)	976.06%	957.85%	931.02%	912.15%	887.96%
	Net Stable Funding Ratio					
18	Total available stable funding	32,095,710	32,162,813	31,320,887	30,558,801	29,732,236
19	Total required stable funding	7,781,569	7,701,917	7,153,990	7,580,479	7,629,755
20	NSFR ratio (%)	412.46%	417.59%	437.81%	403.12%	389.69%

Please note that the information on the Liquidity Coverage Ratio refers to the weighted average values, consistent with the representation provided in the EU LIQ1 template.

Own funds requirements and risk-weighted exposure amounts

The Group deems as a priority the activities of capital management and allocation based on the risk assumed in order to expand its operations and create value. These activities involve the various planning and control stages and, specifically, the planning, budgeting and monitoring processes (analysis of expected and actual performance, analysis and monitoring of limits, performance analysis and monitoring of capital ratios).

In the dynamic management of capital, the Group draws up the capital plan and monitors the regulatory capital requirements, anticipating the appropriate actions to achieve the targets.

On the basis of the EU regulations set out in CRD and CRR, collated and implemented by the Bank of Italy through Circular No. 285 of December 17, 2013 “Supervisory Regulations for Banks” as amended, the Bank must satisfy the following own funds requirements established in Article 92 of the CRR, expressed as a percentage of the total risk exposure amount (RWA - Risk Weighted Assets):

- a Common Equity Tier 1 capital ratio of at least 4.5%;
- a Tier 1 capital ratio of at least 6%;
- a Total capital ratio of at least 8%.

Furthermore, in addition to these minimum requirements, banks are required to meet the combined buffer requirement, according to the article 128(6) of EU Directive 2013/36/EU. Failure to comply with such combined buffer requirement triggers restrictions on distributions, requiring the calculation of the Maximum Distributable Amount (MDA), and the need to adopt a capital conservation plan.

The combined buffer requirement applicable to FinecoBank includes the following buffers:

- Capital Conservation Buffer (CCB) according to the article 129 of CRDIV, which is equal to 2.5% of the total Group risk weighted assets;
- Institution specific countercyclical capital buffer (CCyB) to be applied in periods of excessive credit growth, coherently with the article 160 of CRDIV (paragraphs 1 to 4) which for the Bank is equal to 0.15% as of 31 March 2026. This buffer is calculated depending on the geographical distribution of the relevant Group’s credit exposures and on the national authorities’ decisions, which define country-specific buffers;
- Systemic Risk Buffer (SyRB) defined by the Bank of Italy for all banks authorised in Italy to be applied to a rate of 1% to credit and counterparty risk-weighted exposures to Italian residents, which for the Group is equal to 0.38% as of 31 March 2026.

With reference to the capital requirements applicable to the FinecoBank Group, it should be noted that, at the end of the Supervisory Review and Evaluation Process (SREP), on 3 November 2025 the the Competent Authority communicated that the Pillar 2 Requirement (P2R) applicable to the Group remains unchanged: 2.00% in terms of Total Capital ratio, of which 1.13% in terms of Common Equity Tier 1 ratio and 1.50% in terms of Tier 1 Ratio.

Below is a summary of the capital requirements and reserves applicable to the FinecoBank Group which also highlights the ‘Total SREP Capital Requirement’ (TSCR) and the ‘Overall Capital Requirement’ (OCR) requirements.

Capital requirements and buffers for FinecoBank Group

Requirements	CET1	T1	TOTAL CAPITAL
A) Pillar 1 requirements	4.50 %	6.00 %	8.00 %
B) Pillar 2 requirements	1.13 %	1.50 %	2.00 %
C) TSCR (A+B)	**5.63 %**	**7.50 %**	**10.00 %**
D) Combined Buffer requirement, of which:	3.03 %	3.03 %	3.03 %
1. Capital Conservation Buffer (CCB)	2.50 %	2.50 %	2.50 %
2. Institution-specific Countercyclical Capital Buffer (CCyB)	0.15 %	0.15 %	0.15 %
3. systemic risk buffer for FinecoBank (SyRB)	0.38 %	0.38 %	0.38 %
E) Overall Capital Requirement (C+D)	**8.66 %**	**10.53 %**	**13.03 %**

As at 31 March 2026, FinecoBank ratios are compliant with the above requirements.

The Group assesses capital adequacy by managing and allocating (regulatory and economic) capital according to the risks assumed and with the aim of directing its operations towards the creation of value. The Group has the goal of generating income in excess of that necessary to remunerate risk (cost of equity). This purpose is pursued by allocating capital according to specific risk profiles and ability to generate sustainable earnings, measured as EVA (Economic Value Added) and ROAC (Return on Allocated Capital), which are the main risk-related performance indicators.

Capital and its allocation are therefore extremely important in defining strategies, since on the one hand it represents the shareholders’ investment in the Group, which must be adequately remunerated, while on the other hand it is a scarce resource on which there are external limitations imposed by supervisory regulations.

Own funds requirements and risk-weighted exposure amounts

The definitions of capital used in the allocation process are as follows:

- Risk or employed capital: this is the equity component provided by shareholders (employed capital) for which a return that is greater than or equal to expectations (cost of equity) must be provided;
- Capital at risk: this is the portion of capital and reserves that is used (the budgeted amount or allocated capital) or was used to cover (at period-end - absorbed capital) risks assumed to pursue the objective of creating value.

Capital at risk is measured according to risk management techniques, for which risk capital is defined as internal capital, on the one hand, and supervisory regulations, for which risk capital is defined as regulatory capital, on the other.

Internal capital and regulatory capital differ in terms of their definition and the categories of risk covered. The former is based on the actual measurement of exposure assumed, while the latter is based on templates specified in regulatory provisions. Economic capital is set at a level that will cover adverse events with a certain probability (confidence interval), while regulatory capital is quantified based on a target ratio higher than that required by the supervisory regulations in force.

The process of capital allocation is based on a “dual track” logic, considering both economic capital, measured through the full evaluation of risks via risk management models, and regulatory capital, quantified applying internal capitalisation targets to regulatory capital requirements.

The Group dynamically manages its capital base by monitoring regulatory capital ratios, anticipating the appropriate changes necessary to achieve its defined targets, and optimising the composition of its assets and equity. The capital monitoring and planning is performed by the Group in relation to regulatory capital (Common Equity Tier 1, Additional Tier 1 and Tier 2 Capital and Own funds), and in relation to risk-weighted assets (RWAs). Planning is also carried out taking into account other dimensions relevant to the Group, such as exposure for leverage purposes.

The monitoring is accompanied by an efficient and appropriate communications system, both for management purposes and communications with the supervisory authorities.

The following EU OV1 template shows the information required under Article 438 letter d) of the CRR. It shows the total amount of risk-weighted exposure and the corresponding total own funds requirement, broken down by the different risk categories.

Own funds requirements and risk-weighted exposure amounts

EU OV1 – Overview of total risk exposure amounts

(Amounts in € thousand)

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		03.31.2026	12.31.2025	03.31.2026
1	Credit risk (excluding CCR)	2,764,001	2,761,170	221,120
2	*Of which the standardised approach*	*2,764,001*	*2,761,170*	*221,120*
3	*Of which the Foundation IRB (F-IRB) approach*	-	-	-
4	*Of which slotting approach*	-	-	-
EU 4a	*Of which equities under the simple risk weighted approach*	-	-	-
5	*Of which the Advanced IRB (A-IRB) approach*	-	-	-
6	Counterparty credit risk - CCR	378,956	289,784	30,316
7	*Of which the standardised approach*	*25,032*	*29,827*	*2,003*
8	*Of which internal model method (IMM)*	-	-	-
EU 8a	*Of which exposures to a CCP*	*1,990*	*2,403*	*159*
9	*Of which other CCR*	*351,934*	*257,554*	*28,155*
10	Credit valuation adjustments risk - CVA risk	261	258	21
EU 10a	*Of which the standardised approach (SA)*	-	-	-
EU 10b	*Of which the basic approach (F-BA and R-BA)*	*261*	*258*	*21*
EU 10c	*Of which the simplified approach*	-	-	-
15	Settlement risk	1,797	327	144
16	Securitisation exposures in the non-trading book (after the cap)	-	-	-
17	*Of which SEC-IRBA approach*	-	-	-
18	*Of which SEC-ERBA (including IAA)*	-	-	-
19	*Of which SEC-SA approach*	-	-	-
EU 19a	*Of which 1250%*	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	*169,213*	*164,793*	*13,537*
21	*Of which the Alternative standardised approach (A-SA)*			
EU 21a	*Of which the Simplified standardised approach (S-SA)*			
22	*Of which Alternative Internal Model Approach (A-IMA)*			
EU 22a	Large exposures	-	-	-
23	Reclassifications between the trading and non-trading books	-	-	-
24	Operational risk	2,985,250	2,985,250	238,820
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	85,697	80,168	6,856
26	Output floor applied (%)	-	-	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	**Total**	**6,299,479**	**6,201,582**	**503,958**

To calculate regulatory requirements for credit and market risks the Group applies standardised approaches, in accordance with Part Three, Title II, Chapter 2 and Part Three, Title IV, Chapters 2, 3 and 4. As regards operational risks the CRR III provides for a common calculation model in accordance with Part Three, Title III, Chapter 1 of CRR. Finally, for the calculation of the regulatory requirement for credit valuation adjustment risk (CVA), the Group applies the reduced basic approach (R-BA), in accordance with Part Three, Title VI of CRR.

The risk exposures (TREA) increase during the first quarter of 2026 is mainly attributable to counterparty risk and, in particular, to securities lending transactions with institutional counterparties.

As at 31 March 2026, 44% of the total capital requirement refers to credit risk (excluding CCR), for which Fineco applies the standardised approach. 6% of the total capital requirement relates to counterparty risk, calculated using the SA-CCR. Credit valuation adjustment risk, calculated using the Basic Approach, is not significant. 3% of the total capital requirement is referred to market risk, for which the Group applies the standardised approach. It should be noted that, as previously mentioned, on 19 September 2025 the Commission Delegated Regulation (EU) 2025/1496 was published, postponing the application of the changes introduced in the regulatory framework for the calculation of capital requirements for market risk

(Fundamental Review of Trading Book - FRTB) to 1 January 2027, after Commission Delegated Regulation (EU) 2024/2795 of 24 July 2024 had already postponed application by one year to 1 January 2026. Finally, the share of operational risks in the total capital requirements is 47%.

FinecoBank Group does not exceed the thresholds for deduction from Common Equity Tier 1 Capital; therefore, the above template includes RWA related to DTA and significant investments weighted at 250%.

Liquidity requirements

Liquidity Coverage Ratio – LCR

The Liquidity Coverage Ratio (LCR) is the short-term regulatory metric of liquidity introduced by the Basel Committee which aims to ensure that credit institutions maintain sufficient liquidity to cover net liquidity outflows for a period of thirty days under stressed conditions. The indicator is, therefore, calculated as the ratio of high-quality liquid assets (HQLA) to expected net cash flows for the next 30 days under stress conditions. Compliance with this regulatory requirement is constantly monitored by setting internal limits within the risk appetite framework that are above the minimum regulatory level of 100%. The regulatory framework applied is represented by:

- with reference to the requirements to be met:
  - CRR article 412 “Liquidity coverage requirement ;
  - Delegated Regulation (EU) 2015/61 of October 10, 2014 and subsequent amendments, which establishes the rules specifying in detail the liquidity coverage requirement set forth in Article 412(1) of the CRR. Specifically, the minimum requirement that all banks authorized in Italy must comply with is 100%;
  - Commission Implementing Regulation (EU) 2024/3117 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to supervisory reporting of institutions;
- with reference to the disclosure information to be published:
  - CRR article 451a defining disclosure of liquidity requirements;
  - Article 8 of Implementing Regulation (EU) 2024/3172 laying down implementing technical for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation.

The following EU LIQ1 template and EU LIQB section report the information required under Article 451a paragraph 2 of the CRR. In particular:

- the average of the liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;
- the average of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer, based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period, and a description of the composition of that liquidity buffer;
- the averages of their liquidity outflows, inflows and net liquidity outflows, based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period and the description of their composition.

Liquidity requirements

EU LIQ1 - Quantitative information of LCR

(Amounts in € thousand)

Scope of consolidation: consolidated		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	**Quarter ending on**	**03.31.2026**	**12.31.2025**	**09.30.2025**	**06.30.2025**	**03.31.2026**	**12.31.2025**	**09.30.2025**	**06.30.2025**
EU 1b	**Number of data points used in the calculation of averages**	**12**	**12**	**12**	**12**	**12**	**12**	**12**	**12**
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					24,508,340	24,064,395	23,567,530	22,873,792
CASH-OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	30,105,035	29,490,658	28,948,482	28,319,552	2,004,887	1,946,598	1,893,265	1,829,342
3	*Stable deposits*	*22,376,971*	*21,925,938*	*21,518,826*	*21,048,407*	*1,118,849*	*1,096,297*	*1,075,941*	*1,052,420*
4	*Less stable deposits*	*7,219,855*	*6,926,165*	*6,653,756*	*6,343,076*	*886,039*	*850,301*	*817,324*	*776,922*
5	Unsecured wholesale funding	*730,298*	*701,003*	*655,819*	*585,974*	*413,020*	*405,448*	*380,136*	*335,129*
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	-	-	-	-	-	-	-	-
7	*Non-operational deposits (all counterparties)*	*730,298*	*701,003*	*655,819*	*585,974*	*413,020*	*405,448*	*380,136*	*335,129*
8	*Unsecured debt*	-	-	-	-	-	-	-	-
9	Secured wholesale funding					*365,682*	*337,494*	*320,811*	*309,489*
10	Additional requirements	277,166	354,958	425,603	479,886	275,799	351,808	419,556	470,006
11	*Outflows related to derivative exposures and other collateral requirements*	*275,727*	*351,019*	*417,277*	*465,425*	*275,727*	*351,019*	*417,277*	*465,425*
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	*1,439*	*3,939*	*8,325*	*14,461*	*72*	*789*	*2,278*	*4,581*
14	Other contractual funding obligations	643,106	653,327	673,527	673,211	627,050	638,493	659,924	659,631
15	Other contingent funding obligations	3,866,882	4,031,228	4,212,236	4,322,743	202,575	205,940	209,354	214,574
16	TOTAL CASH OUTFLOWS					3,889,014	3,885,782	3,883,046	3,818,173
CASH-INFLOWS									
17	Secured lending (eg reverse repos)	2,277,905	2,562,485	2,598,439	2,471,450	31,578	35,482	45,477	39,297
18	Inflows from fully performing exposures	685,308	687,766	668,096	658,987	501,606	506,116	488,727	481,466
19	Other cash inflows	2,585,312	2,511,442	2,436,606	2,371,263	838,717	826,749	813,626	785,311
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	TOTAL CASH INFLOWS	*5,548,525*	*5,761,693*	*5,703,142*	*5,501,699*	*1,371,901*	*1,368,347*	*1,347,830*	*1,306,074*
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-
EU-20b	*Inflows subject to 90% cap*	-	-	-	-	-	-	-	-
EU-20c	*Inflows subject to 75% cap*	*5,548,525*	*5,761,693*	*5,703,142*	*5,501,699*	*1,371,901*	*1,368,347*	*1,347,830*	*1,306,074*
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					24,508,340	24,064,395	23,567,530	22,873,792
22	TOTAL NET CASH OUTFLOWS					2,517,113	2,517,435	2,535,217	2,512,099
23	LIQUIDITY COVERAGE RATIO					976.06%	957.85%	931.02%	912.15%

Liquidity requirements

EU LIQB: qualitative information on LCR, which complements template EU LIQ1

Explanations of the main factors and changes that determine LCR results over time

The Group's LCR is driven by high-quality liquid assets (HQLA), mainly composed of bonds (mainly government and supranational) and liquidity deposited with the Central Bank, thanks to the contribution of stable retail deposits, which increased in the period in line with the deposits growth. Given the Group's business model liquidity outflows are mainly driven by stable and less stable retail deposits, while inflows are mainly driven by revocable current account overdrafts.

The aggregates that contribute to the determination of the LCR indicators shown in the table above are calculated as the average of end-of-the-month observations over the preceding 12 months. The steady increase of the average "Liquidity buffer," due to higher amounts invested in HQLA assets, along with net outflows showing no significant changes, led to an upward trend in the LCR indicator during the period.

Despite the increasing geo-political tensions, the Group's overall liquidity, as described above, remained solid and stable. All liquidity adequacy indicators and analyses, in fact, showed wide safety margins with respect to regulatory and internal limits.

Finally, FinecoBank did not have any difficulties or worsening in the conditions of access to the markets and in the closing of the relative transactions (repurchase agreements, purchase and sale of securities) in terms of volumes and prices.

Concentration of liquidity and funding sources

The concentration risk of funding sources can arise when the Group leverages on a limited number of funding sources with characteristics that could cause liquidity problems in the event of outflows concentrated on a single channel.

The Group's funding, mainly consisted of sight deposits of FinecoBank retail customers, is characterised by multi-channelling. Therefore, funding is not threatened by the withdrawal of funds by a limited number of counterparties or by the disappearance of a funding channel.

Moreover, while confirming sight deposits as its predominant funding source, during the last years the Bank further diversified its liquidity sources offering term deposit instruments (so called Cashpark) to its customers, making use of passive repo trades to fulfil temporary funding needs and through the issuance of financial instruments in the Senior Preferred and Additional Tier 1 segment.

With reference to the issuance activity of the aforementioned financial instruments (initiated for regulatory requirements despite having no specific funding needs), the last relevant transaction was conducted in March 2024, as per details provided in the previous versions of this document.

The EMTN program, which was functional to the above-mentioned issuance activity, expired in February 2025 and is currently being updated, with renewal scheduled for second quarter of 2026.

Finally, the Bank has developed the Sight Deposit Model and the related controls, as well as specific stress tests and controls on current account stability. The Sight Deposit Model is a statistical model whose objective is to estimate the portion of available funds on accounts that customers decide to keep stably liquid. That share is calculated as the ratio among liquidity kept on current accounts and the overall financial position of the client with the Bank. At the same time, the Model estimates the amount of fixed-rate sight deposits considered stable ("Core insensible"). The risk management function checks monthly that the liquidity held by thr Group within the year complies with the results of the Sight Deposit Model.

Basing funding almost only on deposits, even if collected in a widespread and granular manner from customers, can nevertheless expose the Group to concentration in terms of maturity. In order to control this risk, FinecoBank periodically monitors specific indicators, both regulatory (such as the Net Stable Funding Ratio) and managerial.

As for the regulatory indicators, the effectiveness of the funding measures provided by FinecoBank is demonstrated by the levels well above the regulatory limits of the calculated and monitored liquidity ratios (LCR and NSFR).

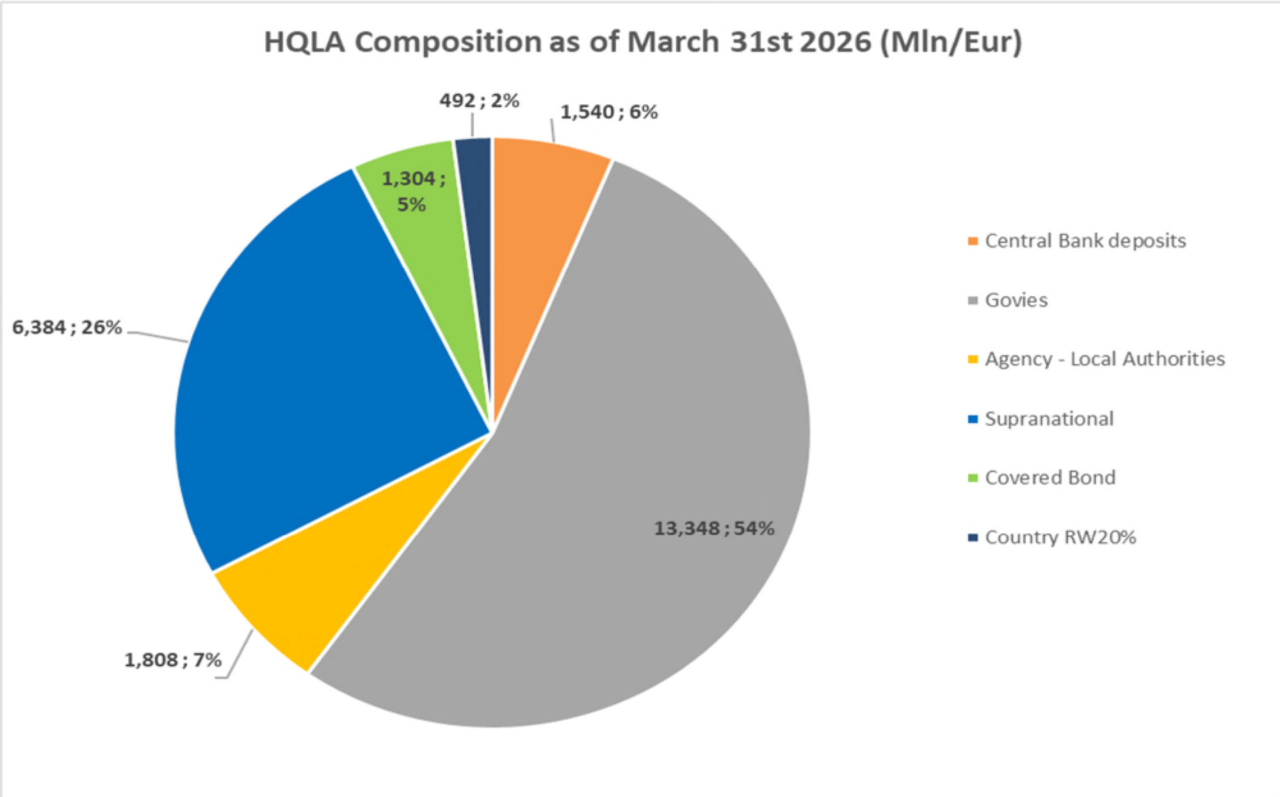
With reference to the managerial indicators, the risk management calculates the so-called Structural Ratio. This ratio was developed by the Parent Company's CRO Department with the aim of monitoring the risk of transformation of maturities, considering the specific features of Fineco's funding. In detail, the indicator considers the contractual maturities of the Bank's assets and liabilities with the exclusion of sight deposits, represented according to the Sight Deposit Model.

High-level description of the composition of the institution's liquidity buffer

The liquidity buffer consists mainly of securities classified as level 1 HQLA by art. 8 of Regulation 2015/61 and in particular of government bonds.

More specifically, the level of HQLA is equal to approximately 24.88 euro billion as of 31 March 2026 and is mainly composed of bonds part of Fineco proprietary portfolio (mainly government bonds) and of the liquidity deposited with the Bank of Italy.

Liquidity requirements



Exposures in derivatives and potential requests for collateral

FinecoBank enters into derivative contracts both with central counterparties and third-party counterparties (OTC), with various underlying and hedging different risk factors (for example changes in interest rates, exchange rates, and securities price).

At the time of entering into new contracts and upon changes in market conditions the Group's liquidity position gets impacted by the obligation to provide margins. The Group is in fact required to pay initial margins and daily variations margins in the form of cash or other liquid collateral.

FinecoBank is able to estimate and check the required margins on a daily basis using internal applications and specific tools provided by clearing brokers. The correct execution of margin payments is also monitored on a daily basis, both in case of cash payment or in case of provision through the allocation of securities as collateral. In this second case, Treasury identifies the securities to be used which will then be included in the specific reports relating to the encumbered assets.

The sensitivity, calculated daily using Parent Company's ALM tool, allows the estimation of the potential absorption of liquidity generated by specific market curve shocks.

Currency mismatch

The Group operates mainly in euro. EU regulations prescribe the monitoring and the communications of a foreign currencies LCR if the aggregated liabilities denominated in foreign currencies can be considered significant i.e. equal or higher than the 5% of the overall balance sheet liabilities of the Group. As at 31 March 2026, the only significant currency for the Group is euro.

Other elements in the calculation of the LCR that are not relevant in the LCR disclosure model, but that the institution considers relevant to its liquidity profile

As at 31 March 2026 FinecoBank is mainly characterized by indirect participation to the payment system and to its relevant ancillary system with the only exception of the instant payment infrastructure in euro, to which FinecoBank adhered directly by opening on the 22/11/2021 its own TIPS DCA account, in addition to the account opened in RT1 and kept active in order to achieve a wider reachability and, beginning from 16/06/2025, through the direct partecipation in ECMS, (Eurosystem Collateral Management System).

Participation in the payment systems, albeit mainly indirect as described above, in any case requires the availability of adequate procedures to manage intraday liquidity risk.

Leveraging on available IT systems (both internal and systemic) Parent Company's Treasury actively manages all its intraday liquidity needs and guarantees the fulfilment of all payment and settlement obligations both in business as usual or contingency situations.

Liquidity requirements

FinecoBank mainly faces intraday liquidity obligations towards:

- Central Bank, in relation to the activities processed on MCA and DCA TIPS accounts and consisting:
  - in the fulfilment of the request to keep on both accounts, individually and on a cumulated level, a positive balance sufficient to allow the respect of minimum reserve requirements on average balances held during the maintenance period;
  - in the execution of daily funding and defunding transactions respecting specific system cut off times;
  - in granting proper and sufficient funding on MCA and DCA TIPS account, respectively to meet up with periodical debit postings by Central Bank and to manage the flows being processed 24/7;
- EBA clearing, in relation to the 24/7 activity on RT1[1] and consisting:
  - in the execution of punctual funding transactions to be estimated based on the expected flows and considering a top up suitable to create a prudential balance to manage overnight and festive flows;
  - in the setup of upper limits representing operational balances cap thresholds that trigger automatic defunding transactions to bring back overall available liquidity to a prudential level able at the same to reduce cost opportunity and fragmentation of the payment capacity in euro;
- correspondent banks, in relation to the operational account and payment operation and consisting:
  - in the execution of punctual daily funding transactions to cover the expected operating flows on reciprocal accounts and to be processed respecting daily cut off times specific of the counterparty or of the market, product, currency involved;
  - in the execution of close of business defunding transactions to keep balances within the credit lines granted to every single counterparty.

The Group in fact adopts a simplified cash management model in major currencies which implies the distribution of its payment capacity on main operational accounts held with the Central Bank (MCA and TIPS DCA accounts) as far as euro is concerned and on specific operational accounts held with the correspondent banks offering payments and cash management services in relation to foreign currencies and to a residual part of euro available liquidity.

Parent Company's Treasury monitors daily and in real time the balance of all the above-mentioned account (with specific focus on opening and close of business available liquidity) in order to guarantee:

- punctuality of ordinary and extraordinary cash flows with greater focus on time recurring and predictable payments;
- respect of assigned limits;
- respect of regulatory and operational obligations with greater focus on those related to the relationships with the Central Bank (as Minimum Reserve requirements).

Furthermore, in order to optimize the financial return of its excess liquidity (not operational), FinecoBank can rely also on term deposit facilities negotiated with third banks[2].

In order to guarantee operational continuity in contingency situations, the process relating to the management of intra-day liquidity is included in the company's Business Continuity Plan where appropriate back-up and operational contingency measures are identified.

[1] Payments in RT1 are settled in real time with funds held at the Central Bank.
[2] FinecoBank activated with a third bank an evergreen deposit account with a notice period of 95 days and since October 2022 is also active on the ECB deposit facility for liquidity in euro.

Declaration of the nominated official in charge of drawing up company accounts

The undersigned Erick Vecchi, as Manager in charge for preparing the Company’s financial reports of FinecoBank S.p.A.

DECLARES

that, pursuant to article 154-bis of the “Consolidated Law on Financial Intermediation”, the information disclosed in this document corresponds to the accounting documents, books and records.

Milan, May 6, 2026

FinecoBank S.p.A.
The Manager in charge for preparing
the Company's financial reports
Erick Vecchi

Statement of compliance with formal policy and internal processes, systems and controls

The undersigned, Alessandro Foti, as Chief Executive Officer and General Manager, and Lorena Pelliciari, as Chief Financial Officer of FinecoBank S.p.A.

CERTIFY

in accordance with the disclosure requirements pursuant to Part Eight of Regulation (EU) No. 575/2013 (as amended), that the information provided pursuant to the aforementioned Part Eight has been prepared in accordance with the internal control processes agreed upon at the level of the management body.

Milan, May 6, 2026

FinecoBank S.p.A.
The Chief Executive Officer and
General Manager
Alessandro Foti

FinecoBank S.p.A.
The Chief Financial Officer
Lorena Pelliciari

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