FINECOBANK GROUP PUBLIC DISCLOSURE – PILLAR III

AS AT 30 SEPTEMBER 2026

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"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 1 January 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 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 30 September 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), has been finalised, aimed at centralizing and making available Pillar 3 disclosures through a single electronic access point on the EBA website. 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 institutions 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 17 December 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 subsequent amendments;
    - 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 30 September 2026);
- approval by the Board of Directors;
- publication of the disclosure. In line with the aforementioned P3DH, the Disclosure as of 30 September 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 and subsequent amendments

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 the 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 30 September 2026 are met. The calculation of Own Funds, and in particular of CET1 capital as at 30 September 2026, took into account foreseeable dividends and charges for a total amount of 424,236 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
		09.30.2026	**06.30.2026**	**03.31.2026**	**12.31.2025**	**09.30.2025**
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	1,535,775	1,500,119	1,470,351	1,445,203	1,391,422
2	Tier 1 capital	2,035,775	2,000,119	1,970,351	1,945,203	1,891,422
3	Total capital	2,035,775	2,000,119	1,970,351	1,945,203	1,891,422
	Risk-weighted exposure amounts					
4	Total risk exposure amount	6,566,822	6,472,867	6,299,479	6,201,582	5,814,637
4a	Total risk exposure pre-floor	6,566,822	6,472,867	6,299,479	6,201,582	5,814,637
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	23.39%	23.18%	23.34%	23.30%	23.93%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	23.39%	23.18%	23.34%	23.30%	23.93%
6	Tier 1 ratio (%)	31.00%	30.90%	31.28%	31.37%	32.53%
6b	Tier 1 ratio considering unfloored TREA (%)	31.00%	30.90%	31.28%	31.37%	32.53%
7	Total capital ratio (%)	31.00%	30.90%	31.28%	31.37%	32.53%
7b	Total capital ratio considering unfloored TREA (%)	31.00%	30.90%	31.28%	31.37%	32.53%
	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%	0.15%	0.15%	0.14%
EU 9a	Systemic risk buffer (%)	0.39%	0.38%	0.38%	0.38%	0.40%
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	-	-	-	-	-
11	Combined buffer requirement (%)	3.04%	3.03%	3.03%	3.03%	3.04%
EU 11a	Overall capital requirements (%)	13.04%	13.03%	13.03%	13.03%	13.04%
12	CET1 available after meeting the total SREP own funds requirements (%)	17.76%	17.55%	17.71%	17.67%	18.30%

Key metrics

Continued EU KM1 – Key metrics

(Amounts in € thousand)

		a	b	c	d	e
		09.30.2026	06.30.2026	03.31.2026	12.31.2025	09.30.2025
	Leverage ratio					
13	Total exposure measure	39,226,154	39,875,442	38,326,346	38,355,223	37,032,524
14	Leverage ratio (%)	5.19%	5.02%	5.14%	5.07%	5.11%
	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)	25,159,983	24,975,880	24,508,340	24,064,395	23,567,530
EU 16a	Cash outflows - Total weighted value	4,047,910	3,996,256	3,889,014	3,885,782	3,883,046
EU 16b	Cash inflows - Total weighted value	1,484,462	1,427,504	1,371,901	1,368,347	1,347,830
16	Total net cash outflows (adjusted value)	2,563,448	2,568,752	2,517,113	2,517,435	2,535,217
17	Liquidity coverage ratio (%)	991.33%	976.44%	976.06%	957.85%	931.02%
	Net Stable Funding Ratio					
18	Total available stable funding	32,504,454	32,856,042	32,095,710	32,162,813	31,320,887
19	Total required stable funding	7,264,551	7,158,893	7,781,569	7,701,917	7,153,990
20	NSFR ratio (%)	447.44%	458.95%	412.46%	417.59%	437.81%

Please note that the Liquidity Coverage Ratio information disclosed in the EU KM1 template 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 17 December 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 Group is equal to 0.15% as of 30 September 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 0.39% as of 30 September 2026.

With reference to the capital requirements applicable to the Group, it should be noted that, at the end of the Supervisory Review and Evaluation Process (SREP), on 3 November 2025 the Supervisory Authority communicated that the capital requirements (Pillar 2 Requirement - P2R) applicable to the Group remain unchanged from the previous one, specifically: 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.

Subsequently, upon conclusion of the 2026 SREP, the European Central Bank communicated a revision of the Pillar 2 requirement applicable as of 1 January 2027, setting it at 1.90% in terms of Total Capital Ratio, representing a 10-basis point reduction compared to the requirement currently in force.

Below is a summary of the capital requirements and reserves applicable to the Group as of 30 September 2026, comfortably met at the same date, which also highlights the 'Total SREP Capital Requirement' (TSCR) and the 'Overall Capital Requirement' (OCR) requirements resulting from the 2025 SREP outcomes. Therefore, the capital requirements included in the table reflect the 2.00% P2R in force until 31 December 2026.

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:	3.04%	3.04%	3.04%
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)	0.39%	0.39%	0.39%
E) Overall Capital Requirement (C+D)	**8.67%**	**10.54%**	**13.04%**

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(d) of the CRR. In particular, it shows the total amount of risk-weighted exposure and the corresponding total own funds requirement, broken down by the different risk categories or risk exposure classes.

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
		09.30.2026	06.30.2026	09.30.2026
1	Credit risk (excluding CCR)	2,976,969	2,836,882	238,157
2	*Of which the standardised approach*	*2,976,969*	*2,836,882*	*238,157*
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	312,552	364,836	25,004
7	*Of which the standardised approach*	*33,324*	*32,554*	*2,666*
8	*Of which internal model method (IMM)*	-	-	-
EU 8a	*Of which exposures to a CCP*	*2,305*	*1,716*	*184*
9	*Of which other CCR*	*276,924*	*330,566*	*22,154*
10	Credit valuation adjustments risk - CVA risk	208	203	17
EU 10a	*Of which the standardised approach (SA)*	-	-	-
EU 10b	*Of which the basic approach (F-BA and R-BA)*	*208*	*203*	*17*
EU 10c	*Of which the simplified approach*	-	-	-
15	Settlement risk	342	977	27
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)	*291,500*	*284,719*	*23,320*
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)	86,787	81,456	6,943
26	Output floor applied (%)	-	-	-
27	Floor adjustment (before application of transitional cap)	-	-	-
28	Floor adjustment (after application of transitional cap)	-	-	-
29	**Total**	**6,566,822**	**6,472,867**	**525,346**

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 increase in total risk exposure amount (TREA) during the third quarter 2026 is mainly due to credit risk and in particular to customer lending.

The distribution of own funds requirements across Pillar 1 risks at the end of the third quarter of 2026 remained in line with that observed at the end of the second quarter of 2026. As at 30 September 2026, 45% of the total capital requirement refers to credit risk (excluding CCR), for which the Group applies the standardised approach. 5% 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. 4% of the total capital requirement is referred to market risk, for which the Group applies the standardised approach. With reference to the own funds requirements for market risk, it should be noted that on 19 September 2025 the Delegated Regulation (EU) 2025/1496 was published, which postpones the application of the changes introduced by the Fundamental

Own funds requirements and risk-weighted exposure amounts

Review of Trading Book (FRTB) regulatory framework to 1 January 2027. Finally, the share of operational risks in the total capital requirements is 45%.

The 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 10 October 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	09.30.2026	06.30.2026	03.31.2026	12.31.2025	09.30.2026	06.30.2026	03.31.2026	12.31.2025
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)					25,159,983	24,975,880	24,508,340	24,064,395
CASH-OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	31,071,798	30,733,204	30,105,035	29,490,658	2,085,654	2,060,222	2,004,887	1,946,598
3	*Stable deposits*	*23,093,689*	*22,817,079*	*22,376,971*	*21,925,938*	*1,154,684*	*1,140,854*	*1,118,849*	*1,096,297*
4	*Less stable deposits*	*7,596,023*	*7,492,235*	*7,219,855*	*6,926,165*	*930,970*	*919,368*	*886,039*	*850,301*
5	Unsecured wholesale funding	*786,149*	*759,484*	*730,298*	*701,003*	*446,607*	*421,188*	*413,020*	*405,448*
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	-	-	-	-	-	-	-	-
7	*Non-operational deposits (all counterparties)*	*744,482*	*759,484*	*730,298*	*701,003*	*404,940*	*421,188*	*413,020*	*405,448*
8	*Unsecured debt*	*41,667*	-	-	-	*41,667*	-	-	-
9	Secured wholesale funding					*411,609*	*394,024*	*365,682*	*337,494*
10	Additional requirements	225,921	251,143	277,166	354,958	224,934	250,398	275,799	351,808
11	*Outflows related to derivative exposures and other collateral requirements*	*224,882*	*250,359*	*275,727*	*351,019*	*224,882*	*250,359*	*275,727*	*351,019*
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	*1,040*	*784*	*1,439*	*3,939*	*52*	*39*	*72*	*789*
14	Other contractual funding obligations	689,098	686,315	643,106	653,327	670,393	667,801	627,050	638,493
15	Other contingent funding obligations	4,080,191	3,907,608	3,866,882	4,031,228	208,713	202,623	202,575	205,940
16	TOTAL CASH OUTFLOWS					4,047,910	3,996,256	3,889,014	3,885,782
CASH-INFLOWS									
17	Secured lending (eg reverse repos)	2,003,333	2,167,611	2,277,905	2,562,485	43,089	32,725	31,578	35,482
18	Inflows from fully performing exposures	696,412	687,973	685,308	687,766	508,169	502,194	501,606	506,116
19	Other cash inflows	2,864,757	2,707,365	2,585,312	2,511,442	933,204	892,585	838,717	826,749
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	*5,564,503*	*5,562,949*	*5,548,525*	*5,761,693*	*1,484,462*	*1,427,504*	*1,371,901*	*1,368,347*
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-
EU-20b	*Inflows subject to 90% cap*	-	-	-	-	-	-	-	-
EU-20c	*Inflows subject to 75% cap*	*5,564,503*	*5,562,949*	*5,548,525*	*5,761,693*	*1,484,462*	*1,427,504*	*1,371,901*	*1,368,347*
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					25,159,983	24,975,880	24,508,340	24,064,395
22	TOTAL NET CASH OUTFLOWS					2,563,448	2,568,752	2,517,113	2,517,435
23	LIQUIDITY COVERAGE RATIO					991.33%	976.44%	976.06%	957.85%

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 Banks, funded by the contribution of stable retail deposits, which increased in the period in line with the growth in customer funding. 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 contributing to the determination of the LCR indicators included in the table above are calculated on end-of-the-month observations over the preceding 12 months. The progressive increase in the average liquidity buffer, driven by higher holdings of HQLA assets, combined with net cash outflows that did not exhibit significant changes, resulted in a generally upward trend in the average LCR ratio over the period.

Despite the increasing geo-political tensions, the Group's overall liquidity 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 latest placement carried out by FinecoBank concerns a Senior Preferred bond issuance, with a nominal value of a 500 euro million, completed on 13 May 2026. In detail, the bond has 6-year maturity with an option for the issuer to call the bond in the fifth year; public placement; traded on the regulated market managed by Euronext Dublin; BBB+ rating (S&P Global Ratings); fixed annual coupon of 3.738% for the first five years, and a floating rate between the fifth and sixth year. The issuance falls within the EMTN (Euro Medium Term Notes) programme approved by the Board of Directors on 8 April 8 2026 and finalized on 11 May 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 the accuracy of the input data of the Sight Deposit Model and validates the output through trend analysis.

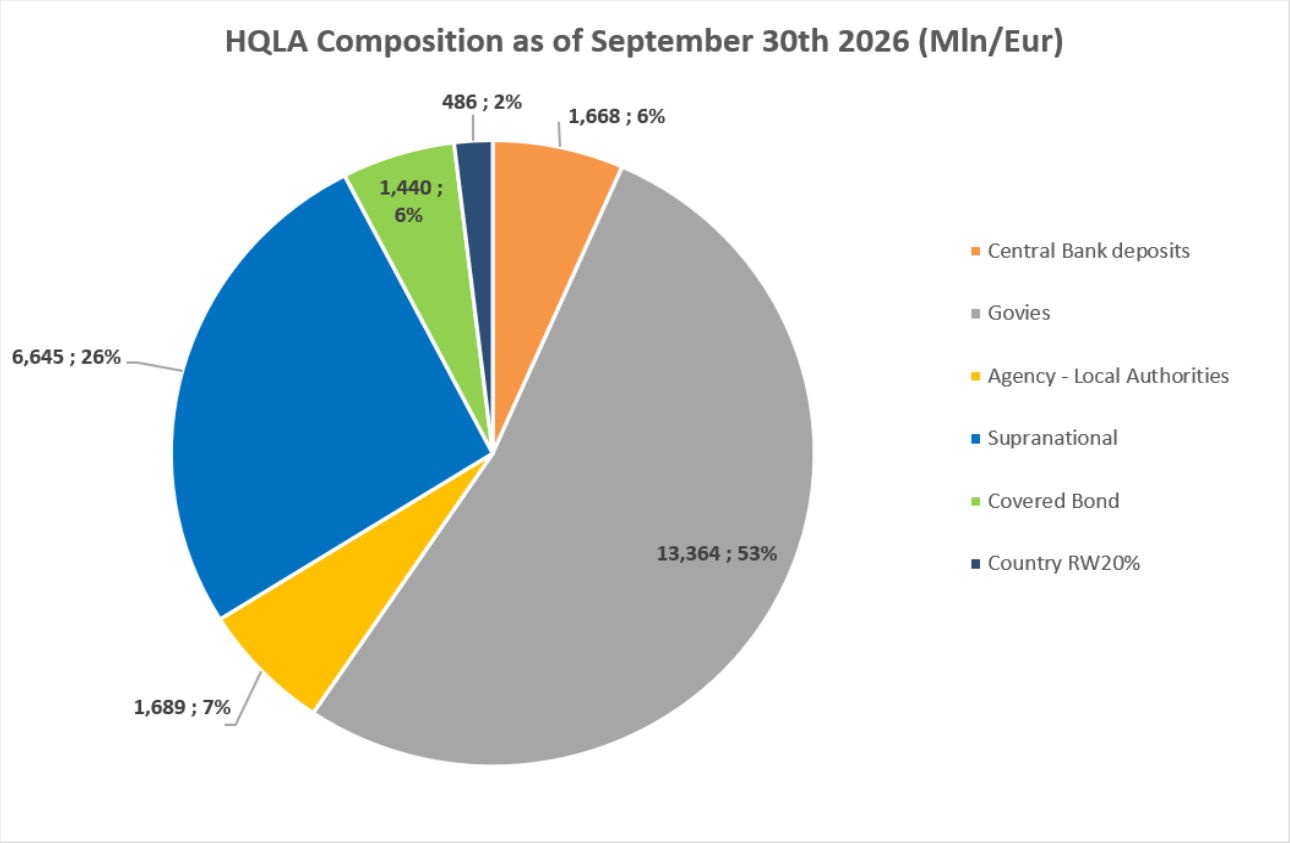
Basing funding almost only on deposits, even if collected in a widespread and granular manner from customers, can nevertheless expose the Group to concentration in terms of maturity. In order to control this risk, FinecoBank periodically monitors specific indicators, both regulatory (such as the Net 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 25.29 euro billion as of 30 September 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



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 30 September 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 30 September 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 June 2025, through the direct participation 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 setup of lower/upper limits representing operational balances floor/cap thresholds that trigger automatic funding/defunding transactions to keep overall available liquidity to a prudential level ensuring coverage of expected operational flows (also taking into account overnight periods and holidays) and 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), the Group can rely also on term deposit facilities negotiated with third banks[2].

Specific indicators are also in place to monitor liquidity risk, including intraday liquidity risk. These are supported by first and second level controls performed by the treasury and risk management functions, respectively, and are governed by internal policies and procedures.

Finally, 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 nominated official in charge of drawing up company accounts 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, 4 November 2026

FinecoBank S.p.A.
The Manager Responsible 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, 4 November 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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