

Diversity Concept

for the Management Board and Supervisory Board of
flatexDEGIRO AG

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A Diversity Concept for the Management Board

The Supervisory Board shall establish the following diversity concept for the composition of the Management Board (§ 289f para. 2 no. 6 German Commerce Act (HGB)):

Together with the Management Board, the Supervisory Board shall ensure long-term succession planning.

In the view of the Supervisory Board, the basic suitability criteria for the selection of candidates for an executive board position are in particular personality, integrity, convincing leadership qualities, professional qualifications for the department to be taken over, past performance, knowledge of the company as well as the ability to adapt business models and processes in a changing world.

In addition, the Supervisory Board also pays attention to diversity. By diversity as a decision-making aspect, the Supervisory Board understands in particular different, mutually complementary profiles and professional experience, also in the international field, different personalities, an appropriate representation of both genders as well as a sufficient age mix. To this end, the Supervisory Board has adopted the diversity concept for the composition of the Management Board outlined below, which also takes into account the recommendations of the German Corporate Governance Code:

- Management Board members should have many years of management experience.
- Management Board members should - if possible - bring experience from different educational backgrounds and professions.
- The members of the Management Board should have many years of management experience, also in the international arena.
- The Management Board as a whole should have many years of experience in the banking environment, information technology, finance, human resources management as well as law and compliance.
- There should be a sufficient age mix among the members of the Management Board.

The Supervisory Board decides with which personality a specific Management Board position is to be filled in the interest of the company and under consideration of all circumstances of the individual case.

Current composition:

The members of the Management Board bring comprehensive knowledge and experience from various, also international, activities outside of flatEXDEGIRO AG. In its current composition, the two-member Management Board fulfils the aforementioned objectives. The age range of the Management Board currently extends from 35 to 53 years. The average age is 44. In view of the long-term Management Board contracts still in place, the Supervisory Board has resolved a minimum target quota for the proportion of women of 0.0 %, valid until 25 October 2025.

B Diversity Concept for the Supervisory Board

The Supervisory Board shall be composed in such a way that its members have the necessary knowledge, skills and professional experience necessary for the proper performance of the duties of an international group of companies, skills and professional experience necessary for the proper performance of the duties of an internationally active group. This does not mean that each individual member of the Supervisory Board possesses all the necessary knowledge and experience, but rather that at least one member of the Supervisory Board can be considered competent for each essential aspect of the Supervisory Board's activities, so that the required knowledge and experience are represented by the entirety of the Supervisory Board members.

1. Description of the areas of competence required on the supervisory board

The Supervisory Board of flatEXDEGIRO AG shall be composed of individuals who, in their entirety provide a spectrum of competencies that can be used to provide comprehensive and effective advice and supervision of the Management Board with regard to the entire business activity. In the opinion of the Supervisory Board, the following are essential components of this range of competencies:

- Experience in the management and supervision of internationally active companies
- Familiarity of the members as a whole with the main areas of activity of the company and related markets and value chains
- Understanding of the company's strategy and its future strategic development, also against the background of changing market requirements, if any
- Knowledge of co-determination law
- Appropriate knowledge of finance, accounting, financial reporting, compliance and risk management
- Knowledge in the field of Corporate Social Responsibility (CSR)
- Knowledge in the field of digitalisation and Industry 4.0
- Communication expertise
- Basic knowledge of stock exchange and stock corporation law as well as the financial markets

Furthermore, with regard to the requirements of § 100 para. 5 German Stock Corporation Act ("AktG"), at least one member of the Supervisory Board and of the audit committee must have expertise in the fields of financial reporting or auditing (financial expert) and the members of the Supervisory Board must be familiar with the financial services industry as a whole.

2. Minimum requirements for professional and personal competences

The individual Supervisory Board members shall possess certain minimum competences required for the proper performance of their mandate:

- Ability to understand and critically analyse the business model
- Basic knowledge of the relevant legal standards
- Basic knowledge of compliance
- Basic financial knowledge, especially in accounting and financial statements
- Ability to audit the annual financial statements, with the assistance of the auditor if necessary

- Ability to understand the reports of the Management Board and the Supervisory Board committees, to critically question them and to draw own conclusions
- Ability to assess the regularity, efficiency, expediency and legality of the business decisions to be evaluated and to be able to check them for plausibility
- Willingness and ability to commit themselves sufficiently in terms of content and time
- Willingness to undergo regular further training, both through internal and external training programmes
- Personal independence and integrity

3. Objectives for the composition of the entire board

1. Every member of the Supervisory Board fulfils the legal and statutory requirements for membership of the Supervisory Board (in particular § 100 paras. 1 to 4 AktG).
2. A Supervisory Board member who is not a member of the executive board of a listed company shall not hold more than a total of five supervisory board mandates at other listed companies or comparable functions, whereby a supervisory board chairmanship shall count double. A Supervisory Board member who is a member of the management board of a listed company shall not hold more than two supervisory board mandates in other listed companies or comparable functions in total and shall not hold a supervisory board chairmanship in another listed company.
3. Each member of the Supervisory Board shall disclose potential conflicts of interest without delay.
4. The Supervisory Board shall have at least two independent members, taking into account the ownership structure.
5. The Supervisory Board shall have at least three members who are independent of the company and the Management Board.
6. If the company has a controlling shareholder, the Supervisory Board shall include at least one shareholder representative who is independent of the controlling shareholder, in accordance with recommendation C.9 of the German Corporate Governance Code.
7. The Supervisory Board shall include at least one member with expertise in the fields of accounting or auditing (§ 100 para. 5 AktG).
8. The Supervisory Board should include at least one member with expertise in the financial services industry, including in an international environment.
9. In order to represent as diverse a range of life experience as possible, there should be a difference of at least 10 years between the age of the youngest and the oldest member of the Supervisory Board. At the time of their appointment by the general meeting, Supervisory Board members should not be older than 70 years.
10. Membership of the Supervisory Board should be limited to 25 years.
11. The chairperson of the Supervisory Board shall be independent of the company and the Management Board. The Supervisory Board shall not include more than two former members of the Management Board.
12. Supervisory Board members shall not exercise any board functions or advisory tasks at significant competitors of the company and shall not have a personal relationship with a significant competitor.

The Supervisory Board of flatexDEGIRO AG is composed in accordance with this objective. It includes an appropriate number of independent members with an international background. With regard to the obligation pursuant to § 111 AktG, the Supervisory Board has resolved a minimum target quota for the proportion of women of 0.0 %, valid until 25 October 2025 based on the current composition.