

2022

Non-financial report

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Foreword by the Management Board

Dear shareholders and friends of flatexDEGIRO AG,

The sustainable further development of the flatexDEGIRO Group and the active representation of the interests of all our stakeholders are essential building blocks for our long-term corporate success. In particular, it is crucial that we fulfill our social mission to establish broad financial education as well as to promote, train and motivate our employees and ensure appropriate, growth-oriented and efficient corporate governance. These focus topics have been at the center of our activities for many years. The challenging market environment of recent months has impressively demonstrated the effectiveness of the measures already introduced.



As a result, we again succeeded in attracting more than 460,000 new customers to our platform and the associated direct access to the capital market in 2022. Long-term, well-considered investments on the capital market can make a significant contribution to financial security in old age. We actively promote the financial education required for this with a variety of free offers and initiatives, not least with our documentary "The Art of Investing," which has been broadcast on Discovery since January 2022. We are proud to have already reached well over 1 million viewers with this. In parallel, we launched our "DEGIRO Women" initiative in February 2022 with the aim of helping even more women to take control of their finances; partnerships with LINDA. and The Next Women further enrich this initiative.

We were also able to further expand our workforce in a targeted manner in 2022 and strengthen it with over 300 new colleagues. It is this team of now almost 1,300 employees that deserves our thanks and respect with its outstanding commitment, entrepreneurial thinking and clear focus on customer needs. As an employer, this obliges us to give our best to this strong team every day. Awards as a top employer, high participation and commitment values in our annual employee survey, and moderate employee turnover confirm that we are on the right track in this respect.

We are taking account of the continuously growing size of our Company and the associated increase in responsibility and complexity by expanding and diversifying the Supervisory Board and Management Board. A process that will be accompanied by further adjustments to internal structures and procedures in order to equip flatexDEGIRO even better for the

Foreword by the Management Board

tasks that lie ahead and to ensure that we can continue to actively exploit the opportunities that present themselves in the best possible way to expand our leading position in Europe.

We want to live up to our corporate responsibility in all dimensions and are therefore expressly committed to the guiding principle of sustainable development. We underline this with flatexDEGIRO's commitment to the United Nations Global Compact Initiative. Based on a total of ten principles in the areas of human rights, labor standards, environmental protection and anti-corruption, the initiative pursues the vision of an inclusive and sustainable global economy.

For 2023, we have set ourselves the goal of increasing the proportion of suppliers who commit to our Business Partner Code of Conduct to at least 40%, maintaining the number of training courses per year at an unchanged high level, and continuing to drive forward the electrification of our vehicle fleet.

You will find these and other objectives as well as details on improvements already achieved in the following report. We hope you enjoy getting to know flatexDEGIRO from a different perspective.

Frank Niehage, LL.M.
CEO

Muhamad Said Chahrour
Deputy CEO and COO

Dr. Benon Janos
CFO

Stephan Simmang
CTO

The background of the slide is a bokeh effect of city lights at night. The lights are out of focus, creating soft, glowing circles in various colors including yellow, orange, red, and white. The overall atmosphere is warm and vibrant.

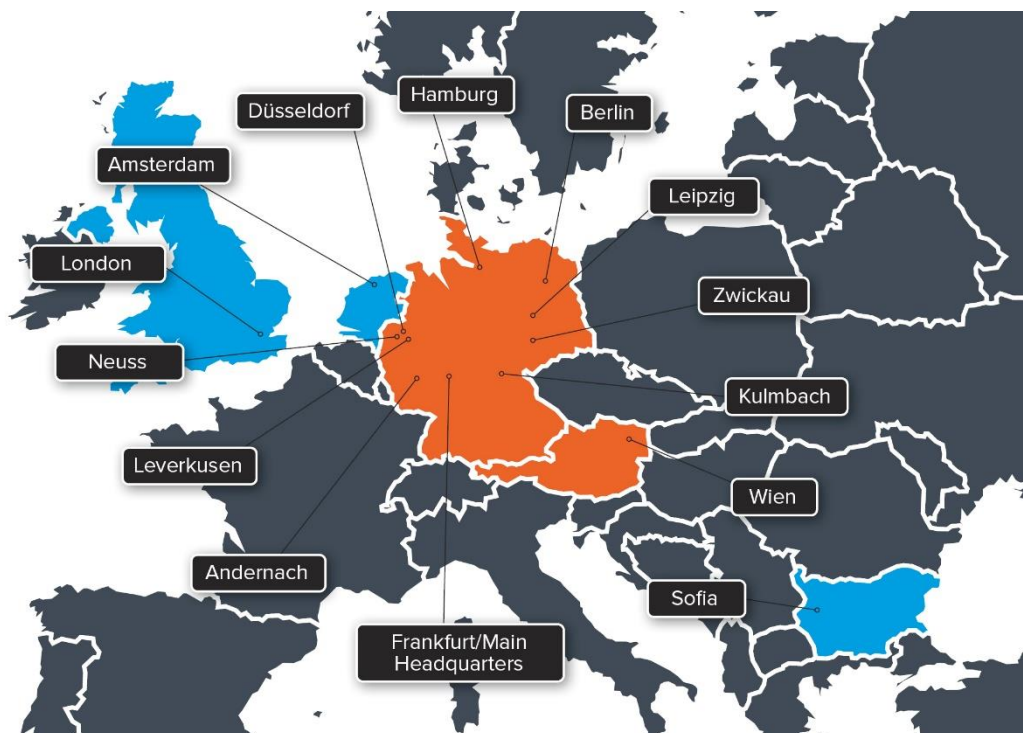
Business Model of the Group

Business Model of the Group

In the area of financial services and financial technology, flatexDEGIRO AG, together with its subsidiaries, offer online brokerage and IT solutions with high standards of security, performance and quality. The focus of its business activities is on online brokerage. flatexDEGIRO considers itself as one of the largest retail online brokers in Europe in terms of geographic reach, the number of transactions processed and customers served.

As the parent company, flatexDEGIRO AG is a European provider of financial technologies. Its business activities consist of the development, provision and operation of future-proof and efficient IT solutions. The solutions are meant for the settlement of securities transactions and payment transactions for European banks and financial service providers. This includes in particular the provision and operation of the IT infrastructure for the private customers of the flatexDEGIRO Group, which ensures the processing of customer transactions in 16 European countries.

As of the reporting date, flatexDEGIRO AG operates its business at ten locations in Germany. In addition, there is one location each in the Netherlands, the United Kingdom, Austria and Bulgaria. As at the reporting date (December 31, 2022), a total of 1,293 employees (previous year: 1,129) were employed by the flatexDEGIRO Group.



Financial Services segment (FIN)

The Financial Services segment mainly comprises the activities of flatexDEGIRO Bank AG, which divides its business activities into operating segments, namely; Online Brokerage, Non-Brokerage and Credit & Treasury.

Core business: Online Brokerage

With flatex, DEGIRO and ViTrade, three established and successful online broker brands belong to flatexDEGIRO. All online broker brands specialize in the non-advisory securities business, targeting traders and investors who take responsibility for their own trades. With successful growth, an increasingly broad customer base is being addressed. The trading offering covers all types of securities with trading opportunities on German and numerous international exchanges as well as off-exchange direct trading. As exclusive online brokers, the brands do not maintain branches, but provide various trading platforms and access options for trading securities products. These are being further developed on a user-oriented basis to reach additional customer groups. For example, flatex in Germany has been offering its customers an optimized user interface (**flatex next**) since the end of November 2020. With 4.5 stars in the Apple App Store, **flatex next** was rated by users as one of the best online brokerage apps in Germany in 2022. A roll-out for desktop apps is planned for 2023.

Portfolio business: Non-Brokerage

Within the Non-Brokerage business segment, flatexDEGIRO Bank AG offers its partners the complete product range of a full-service bank as an outsourcing solution. The bank does not make any external appearance, but carries out all processes on behalf of the respective partners. For example, services are offered in the areas of employee participation and business process outsourcing (BPO).

Credit & Treasury (C&T)

As a by-product of the online brokerage business, the Group holds over 3 billion EUR in customer funds as at December 31, 2022. In the reporting year 2021, flatexDEGIRO Bank AG significantly revised its credit strategy and focused on the low-risk securities-backed lending business. The remaining loan portfolio was gradually reduced through maturity or redemption. This also includes the factoring portfolio. Supplementary real estate financing as a treasury substitute was also strategically discontinued at the end of 2022.

In the treasury area, a broad diversification of cash and capital investments is pursued. The diversification instruments includes overnight and time deposits, bank and government bonds, cash advances, mortgage bonds, UCITS (Undertakings for Collective Investment in Transferable Securities) and special funds (Alternative Investment Funds, "AIFs"). Within the framework of the internal investment policy, the management of interest-bearing own investments is based on the respective current business and medium-term planning, as well as a regular review of target achievement during the year. The focus is on protecting the capital invested.

Technologies segment (TECH)

The business activities of flatexDEGIRO AG consist of the development, production, distribution and maintenance of software, hardware and IT infrastructure. The key product of flatexDEGIRO AG is the core

banking system **FTX:CBS**, which combines the technical support of all bank- and brokerage-specific business processes in one system.

Designed as a standard platform for the technological mapping of business processes for full banking operations, **FTX:CBS** meets current regulatory, security and availability requirements. The hosting and operation of **FTX:CBS** takes place in flatexDEGIRO AG's own high-performance data centers, which ensure secure and redundant operations. The combination of software and IT infrastructure created a scalable system that allows flatexDEGIRO AG to process a growing number of transactions with its own systems. In doing so, flatexDEGIRO was able to process 67 million transactions of 2.4 million customer accounts across the group in 2022.

In addition to **FTX:CBS**, the Limit Order System (L.O.X) of the Group's subsidiary Xservices GmbH is capable of ensuring technical order routing and monitoring the limit orders of approximately 20 European brokers against the price feed of connected issuers with around 700,000 products.

Goals and strategies

flatexDEGIRO AG has set itself the goal of further expanding and consolidating its position as the leading European online broker. The focus is on the continuous further development of the trading applications, expansion of the range of products, and improving transparency in pricing. In doing so, the Group is primarily aiming for sustainable, above-average growth and rapid market penetration. The specific goal is to further increase awareness of the flatex and DEGIRO brands in European countries. Maintaining a leading technological position is also critical to success. By leveraging economies of scale and an efficient centralized business organization, flatexDEGIRO also aims to achieve a further increase in profitability and value creation for its shareholders through growth.

The goals for the operating segments (explained below) are derived from the overarching targets.

flatexDEGIRO aims to sustainably increase its customer base through a dynamic expansion of its product and service offering, innovative and easy-to-understand trading applications, and an increased media presence. In concert, the number of securities transactions processed will continually grow in line with customers' trading activity. This should not only increase revenues, but also generate further economies of scale, thereby significantly reducing costs per transaction and improving profit margins. These effects will be reinforced by the emerging trends, which point to positive long-term growth in the European online brokerage market. These include not least the continuing significantly negative real interest rates, increasing affinity for online activities, easier access to capital market products, and systemic problems in a large number of state pension systems, where pay-as-you-go procedures are under severe strain due to demographic change.

Following the acquisition of DEGIRO in July 2020, the Group intends to grow organically with its online brokerage brands in existing markets by attracting new customers with its favorable pricing model, extensive and independent product offering, and transparent, convenient, and customer-oriented platforms. In this context, international growth will focus on DEGIRO, and growth in Germany and Austria on flatex.

In the brokerage business, "digital proximity" to the customer is crucial. In addition to transparent communication and rapid provision of the relevant information, this includes a stable brokerage platform with state-of-the-art functions, innovative products and processes. The added value for the customer arises from the interaction of "product", "platform" and "price". In addition to an attractive price/performance ratio with an extensive, innovative and constantly growing product portfolio, continuous investment in the platform is an essential component to ensure continuous availability even on particularly busy trading days.

Within the online brokerage market, there is a broad spectrum of customers, some of whom pursue different investment objectives. Pragmatically, customers use the online brokerage service for savings in plans that serve as long-term investments. In addition, there are customers who use the brokerage service for active trading, resulting in portfolios with a more short-term orientation. flatexDEGIRO will continue to expand the flatex and DEGIRO brands in both directions.

With **flatex next**, the introduction of a user interface took place in Germany at the end of 2020. The user interface was designed for a more friendly and intuitive user-experience for less experienced customers in comparison with the prior interface. Through this interface redesign, flatexDEGIRO aims to provide everyone with an easier access to the capital market. A broad section of the population is given the opportunity to buy securities with just a few clicks and thus contribute to their personal retirement provision.

Sustainable investments can be interesting both from a return perspective and in terms of their contribution to an environmentally-protected and socially just society. By promoting this form of investment and other sustainable financial incentives, a contribution can be made to a more sustainable economic development. It is therefore the goal of flatexDEGIRO to make ESG products visible, for example, by improving the availability and visibility of company shares that pay particular attention to the environment, society and good corporate governance. For this purpose, there is already a category "flatex green" in the stock, ETF and fund search. The **flatex next** filter function for sustainable products was enhanced in 2022, and will be further expanded in the coming years.

The Group is also pursuing marketing strategies aimed at expanding awareness of both brands in Europe. Digital marketing with a clear focus on financial market education and information is at the forefront. An extensive information and training offering on basic economic and financial knowledge, introductions to the flatexDEGIRO online platforms, and product training help flatexDEGIRO customers to make considered and informed decisions. Videos, interactive formats, and topic-based events (online and offline) are designed to offer a broad selection of information sources.

To complete the growth targets, acquisitions and strategic partnerships can be made if necessary. Potential candidates include online brokers that have higher costs per transaction, higher customer acquisition costs, inefficient product partnerships, or are unable to cope with increasing regulatory requirements. Processes and systems, marketing strategies, the Group's award-winning product and service offering, and its experienced management team have the potential to increase profits and create value.

The operating objective of the Technologies segment is to provide high-quality IT services for the Group's own online brokerage business. The objective includes enabling compliance with statutory and regulatory requirements, and supporting efficient business operations through a stable performance. Technical harmonization and a further increase in the level of automation in internal process flows are also a focus for regulatory and risk minimization considerations. In addition, the ongoing technical harmonization of existing

processes and systems from the acquisition of DEGIRO is a key element in leveraging the synergy potential of the cooperation and continuing to optimize the utilization of FTX:CBS.

The further expansion of FTX:CBS is geared to the needs of the corporate group. This includes the expansion of the digital brokerage platforms and the Group's own OTC trading platform - L.O.X.

More detailed information on the business model can be found in the Annual Report 2022 on pages 38 to 59.

Legal Framework

Legal Framework of the Separate, Non-financial Group Report

flatexDEGIRO AG published its second (2022) separate non-financial Group report (hereinafter: non-financial report) in accordance with the German Commercial Code (HGB) and thus complies with the requirements of the CSR Directive Implementation Act (CSR-RUG) at company and Group level in accordance with Sections 315 b and 315 c in conjunction with Sections 289 b to 289 e HGB.

The reporting period of the non-financial report corresponds to the calendar year. Unless otherwise stated, all disclosures made in the report relate to the Group companies that are also included in the consolidated financial statements .

References to information outside the combined group management report and the management report of flatexDEGIRO AG are additional information and not part of the non-financial report.

In preparing the non-financial report, the standards of the Global Reporting Initiative (GRI) as the recognized framework for sustainability reporting was followed (Please the GRI content index starting on page 56).

Within the non-financial report, material risks must be reported in accordance with Section 289 c (3) No. 3 and 4 of the German Commercial Code (HGB), as long as the disclosures are necessary for an understanding of the course of business, the business results, the position of the Group, and their impact on non-financial matters. flatexDEGIRO understands risk and opportunity management as the ongoing task of identifying, analyzing and evaluating the spectrum of possible and actual developments within the Company, and its environment. The Group has implemented a wide range of risk-reducing measures in this context. In the net assessment of risks, there are no material risks in relation to the aspects of the CSR-RUG identified as relevant for the non-financial report that are associated with own business activities (including products, services, business relationships), that will (very likely) have serious negative effects on non-financial matters. For further information, please refer to the section "Forecast and opportunities report" in the Group management report for fiscal 2022.

The non-financial report was prepared by the Executive Board and reviewed and approved by the Supervisory Board of flatexDEGIRO AG for legality, propriety and appropriateness.

Sustainability management

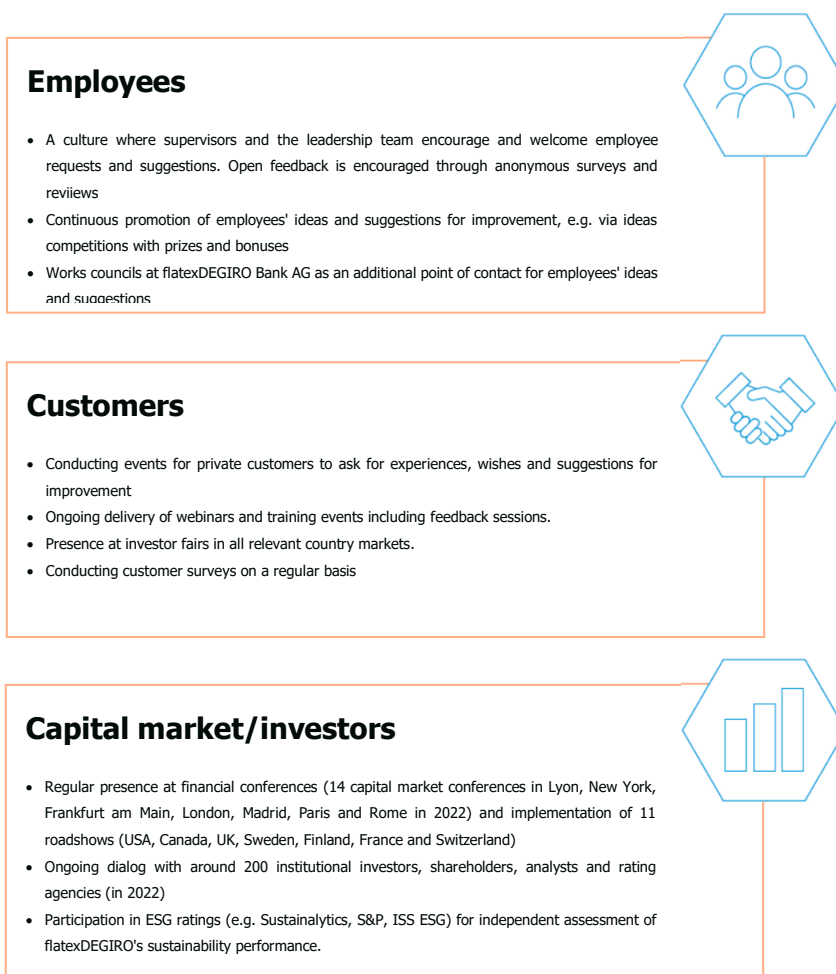
flatexDEGIRO understands sustainability as a long-term value driver that brings benefits at economic, ecological and social levels. In this sense, flatexDEGIRO is committed to the guiding principle of sustainable development. Economic success, integrity, responsibility for employees and society, and also environmental protection are already practiced on a daily basis (see chapter "Environment"). To underscore this claim, flatexDEGIRO joined the United Nations Global Compact (UNGC) in 2021. UNGC is the world's largest and most important initiative for sustainable business and by joining, flatexDEGIRO is committed to recognizing

the ten universal principles in the sustainability dimensions of human rights, labor standards, environmental protection and anti-corruption. This non-financial report is also doubles as the progress report for the UNGC.

The Management Board of flatexDEGIRO AG is advised by a Sustainability Officer, who is consults regularly with the responsible specialist departments, and the Management Board. Expertise in the area of sustainability is an important prerequisite of the competence spectrum for the Supervisory Board . There is therefore responsibility at board level for ESG/sustainability issues.

It is also important to maintain a respectful and regular consultation with all relevant stakeholders. These include the customers, employees, business partners, shareholders, associations and authorities, as well as representatives from politics and science. During the consultations, the aim is to receive suggestions, understand positions, identify trends, and develop partnerships. At the same time, flatexDEGIRO uses open dialog to discuss current challenges and to highlight which framework conditions are important for the Group. As a matter of principle, stakeholder feedback is incorporated into business considerations, further developments and decision-making processes.

As part of the stakeholder consultation, there is regular exchange with a wide range of stakeholders, including:



Educational Institutions



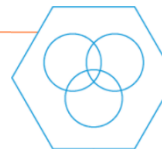
- Cooperation with the Frankfurt School of Finance & Management (FSOF) for a dual degree program since 2015
- Co-teaching of the lecture "Communication and Information Systems" including exam administration for students at FSOF
- Supporting top performers in FSOF through scholarships or funding/partial funding of doctoral students/chairs.
- Cooperation with Krefeld University of Applied Sciences (focus on IT)

Suppliers



- Review of all suppliers with regard to compliance and governance guidelines of the AG
- Exchange with the Group's main suppliers/service providers for the procurement of energy-efficient IT infrastructure, clients or also process-related optimizations

Industry associations/regulatory authorities/policy



- Membership in the Association of German Banks, CFD Association, Bitkom e.V., bwf Bundesverband der Wertpapierfirmen e.V., Bundesverband Fuhrparkmanagement e.V., Deutscher Derivate Verband, Deutsches Aktieninstitut e.V., Deutsches Institut für Interne Revision e.V., DIRK - Deutscher Investor Relations Verband e.V., DSAG e. V, European Economic Senate (EWS) e.V., GDD e.V.
- Ongoing dialog on political-regulatory issues with supervisory authorities (Bundesbank/ BaFin) as well as membership of the European Economic Senate
- Membership in the exchange council/working groups of several regional exchanges
- Participation in Deutsche Börse/Clearstream working groups
- Participation in UP KRITIS (Public-Private Partnership for Critical Infrastructure Protection)

For flatexDEGIRO as a listed company, consultation with the capital market is very important. The Investor Relations department regularly consults with investors and analysts regarding business developments. The communication channels include company presentations at roadshows, analyst meetings, or the publication of current news on the website. In fiscal year 2022, the Group was assessed by several rating agencies in terms of financial and non-financial performance. Of particular note is the independent rating for ESG risk and sustainability performance by Sustainalytics: flatexDEGIRO's ESG risk rating was **significantly improved** from medium risk to **low risk** due to a strong management of manageable risks. It is expected that both the measures already initiated, and the constant further development of the Group's sustainability management will result in a continuous improvement of the non-financial performance.



Materiality analysis

To identify the sustainability topics relevant to flatexDEGIRO, a materiality analysis was conducted in 2020 based on the principles of sustainability context, materiality and completeness.



The purpose of this materiality analysis is to identify those topics that are material both for an understanding of the development course of the business, performance of the business, and for an understanding of the impact of the business activities on non-financial aspects. The material topics identified form the basis for the development of flatexDEGIRO's sustainability goals and reporting on non-financial topics.

A multi-stage process was used to identify these material topics: Firstly, a catalog of topics was drawn up on the basis of national and international reporting standards, statutory regulations, peer group analyses, and best practices. This resulted in a catalogue containing a wide range of sustainability relevant topics. Clustering the topics and assigning them to pillars formed the basis for the internal coordination and discussion that followed in the second step. The result was a catalog of potentially relevant topics for flatexDEGIRO from five pillars. The subsequent survey was conducted using a web-based query tool and focused on the Management Board, managers, and employees from the specialist departments. They were asked to rate the topics using a four-point scale based on two predefined criteria:

1. relevance for the long-term business development of flatexDEGIRO
2. Significance of the impact of flatexDEGIRO's business activities

Consequently, a topic was assessed as material if it either has a high direct relevance for the business development, and/or the impact of the business activities on this topic is assessed as high. In assessing the material sustainability issues, the managers and experts from the specialist departments drew on their experience, consultation with stakeholders, and industry observations.

During the materiality analysis, flatexDEGIRO identified eleven topics as material according to the CSR-RUG. The results show that flatexDEGIRO's understanding of sustainability is closely linked to its business activities and value creation processes. In addition to the legally relevant concerns, additional non-financial concerns that deal with the topic of "customers and products" are reported.

In the following table, the topics identified as material are assigned to the non-financial matters defined by law and the reporting in this report:

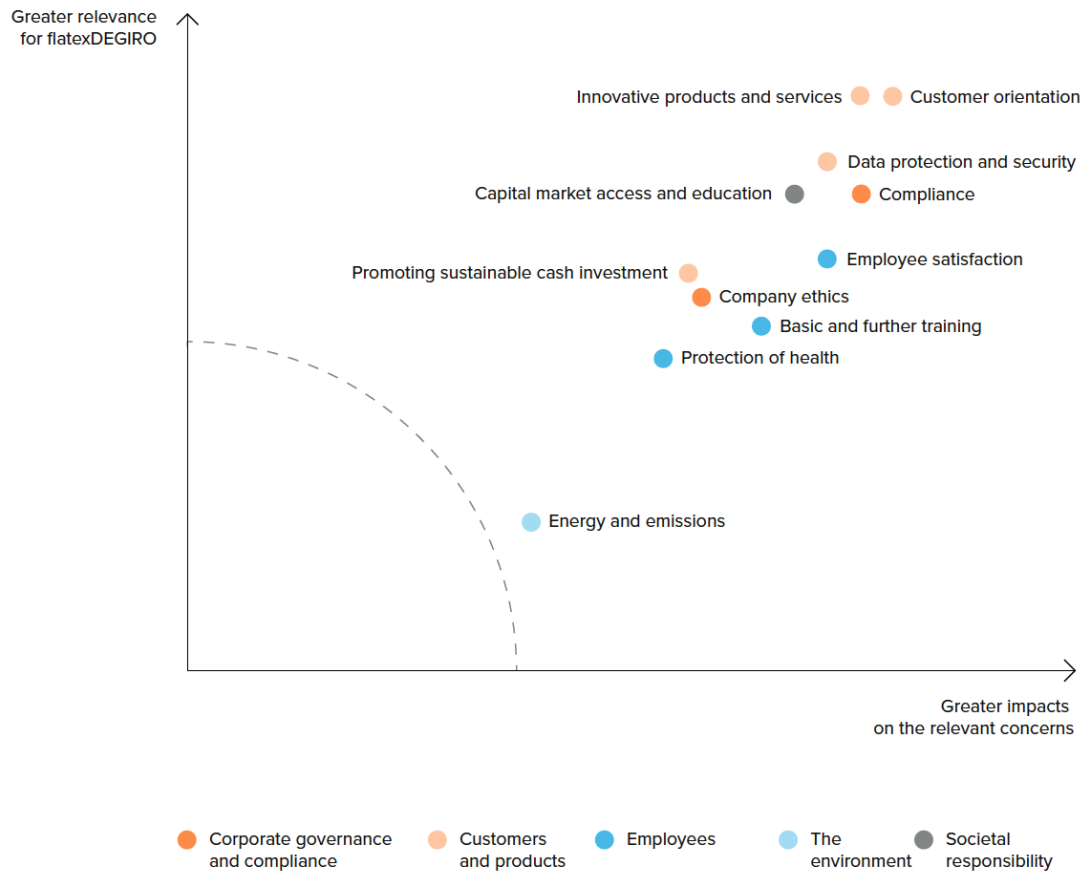
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NFB-relevant concerns	Essential theme	Section/ Page
Environmental concerns	1. Energy and emissions	Page 43
Employee concerns	2. Education and training	Page 35
	3. Health protection	Page 38
	4. Employee satisfaction	Page 39
Respect for human rights	5. Compliance	Page 22
Combating corruption and bribery	6. Business Ethics	Page 21
Social issues	7. Capital market access and education	Page 54
Customers and products	8. Data protection and security	Page 27
	9. Customer orientation	Page 28
	10. Innovative products and services	Page 30
	11. Promotion of sustainable investment	Page 31

The Executive Board of flatexDEGIRO has validated and adopted the identified material topics . They were transferred into a materiality matrix as follows:



Materiality matrix



In view of the Corporate Sustainability Reporting Directive (CSRD), which will become mandatory for flatexDEGIRO AG with the reporting for fiscal year 2024, we intend to update the materiality analysis in 2023, which will focus on the double materiality required by the regulations in the future. In this way, we identified both sustainability issues on which we have a potentially positive or negative impact through our business activities along the value chain and those that have or could have a positive or negative impact on our corporate success.

Sustainability strategy

Responsible action and a clear strategic orientation form the compass for the further sustainable development of flatexDEGIRO. To strengthen long-term economic success and fulfill our social responsibility, flatexDEGIRO integrates ecological and social issues into its core business.

In 2021, we specified the content of our sustainability claim and developed a holistic sustainability strategy based on the materiality analysis described above. In 2022, flatexDEGIRO's strategic sustainability actions were further driven by the materiality analysis depicted above. In workshops, the Board of Management, the director responsible for sustainability issues, and the specialist departments dealt intensively with the



key issues in the areas of environment, social and governance (ESG). Targets were developed and measures defined to achieve them. The achievement of targets were measured - wherever possible - by means of qualitative and quantitative performance indicators.

The following tables show the targets and deadlines of the five pillars. In the individual chapters, the current status of the respective topics are reported.

With the planned update of the materiality analysis in 2023, a fundamental revision of the sustainability strategy, and the derivative targets and KPIs will be made. The update will take into account the upcoming legal and regulatory requirements.

Corporate Governance and Compliance

Responsible corporate governance, action guidelines, and effective management systems are the framework with which our aspirations are translated into daily action.

Topic	Goals/Measures	KPI	Time frame	Status
Business Ethics	Formulation of flatexDEGIRO's corporate ethical values and inclusion in the Code of Conduct		2021	
	Signature of the Business Partner Code of Conduct by suppliers	40 % of all suppliers	2023* (PREV. YR.: 2022)	
		100 % of all suppliers	Continuous	
Compliance	Integration and consolidation of DEGIRO's compliance functions into the group-wide compliance system		2021	
	Evaluation of an extended whistleblowing system		2023* (PREV. YR.: 2022)	



*adapted

Ongoing Completed Under way

Customers and products







We offer our customers innovative products and services, a secure and stable technical infrastructure, and efficient transaction processing.

Topic	Goals/Measures	KPI	Time frame	Status
Data protection and -security	Annual training of the Employees on data protection and safety	100 % of employees	Continuous	
Customer orientation	Establishment of an additional customer service center in Hamburg		2021	
	Minimization of customer complaints	Net Promoter Score (NPS) > 50	Continuous	
Innovative products and services	Further development of the trading Apps	Percentage of customer complaints	Continuous	
	Cooperation with partners from research, universities, scientific institutions and the media landscape		Continuous	

Promotion of sustainable Investments	Transparent presentation and search options for ESG products on the website of flatexDEGIRO	Share of ESG products traded in volume and number	Ongoing since 2021	
	Educational work with regard to sustainable financial products in cooperation with partners	Participants in seminars (in relation to the number of users)	Ongoing since 2021	

Employees

Challenges are best mastered as a team, especially in such a dynamic market environment. We want to continue to grow and secure the success of our company together.







Topic	Goals/Measures	KPI	Time frame	Status
Education and training	Expansion of the training program at flatexDEGIRO	Number of continuing education hours > 30h per year and employee*.	Continuous	
	Conducting feedback and development meetings with all employees	100 % of employees	Continuous	
Health protection	Establishment of a uniform Group-wide occupational safety strategy		2021	
	Offer health-related Preventive medical check-ups, vaccinations, occupational health and safety training courses		Continuous	
Employee satisfaction	Conducting a survey of employees	> 70% of employees	2021	
	Introduction of a new, group-wide HR management system for all flatexDEGIRO employees		2021	

*adapted




 Ongoing  Completed  Under way

Environment

We use natural resources sparingly, continuously reduce our energy consumption and lower our CO₂ footprint.

Topic	Goals/Measures	KPI	Time frame	Status
Energy and emissions	Conversion to green power at all Sites from flatexDEGIRO	100 % of the German Office locations	2022	
		100 %	2025	
	Expansion of emissions calculation according to GHG Protocol	emissions according to Scope 1, 2 and 3	Continuous	
	Reduction of emissions according to GHG Protocol	Scope 1 and Scope 2 emissions of the German Office locations at least -20 %	2022	
		Scope 1 and Scope 2 emissions of all sites at least -70 %.	2026	
		Scope 3 emissions of all sites by up to -30 %	2026	








Conversion to LED technology at all flatex locations	2021	
Group-wide switch to thin clients/notebooks	2021	
Introduction of an environmental data collection tool	2023* (PREV. YR.: 2022)	

*adapted

Social responsibility

We enable easy access to the capital market and promote financial literacy among people.

Topic	Goals/Measures	KPI	Time frame	Status
Capital Market Access & Education	Introduction of flatex next for simplified and fast access to stock exchange trading		2021	
	Regular implementation of generally accessible webinars and information events	Number of webinars, Number of participants	Continuous	

 Ongoing  Completed  Under way

Corporate Governance

Corporate Governance and Compliance

flatexDEGIRO is socially responsible in many respects. In addition to creating value for all relevant stakeholders, this also includes keeping a constant eye on the impact of our business model. As a forward-looking company, the task is to integrate economic, environmental and social aspects of responsible corporate governance.

In this context, compliance with regulatory requirements and laws as part of a comprehensive compliance management forms the basis of our actions. However, our responsibility goes far beyond compliance with the minimum legal requirements. flatexDEGIRO is committed to its stakeholders, which include shareholders, customers and business partners. flatexDEGIRO is specially committed to its stakeholders, which include, customers and business partners. As an employer, there is very high responsibility for the employees based on the commitment to create added value to society.

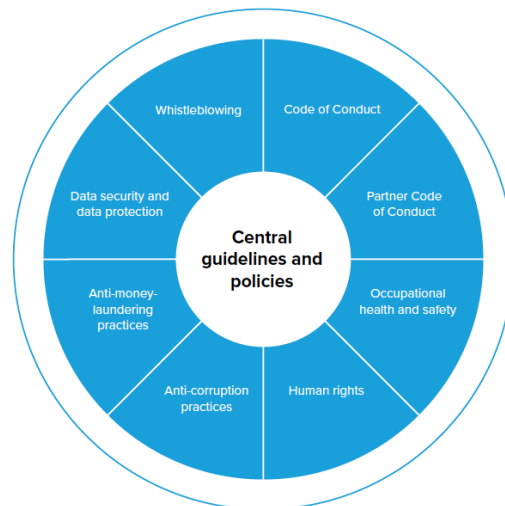
The principles of good corporate governance are implemented on a daily basis at flatexDEGIRO by aligning corporate governance structures with corporate values, operational guidelines and effective management systems.

Business ethics

Our corporate ethics are expressed in our values, policies and daily actions. It determines how we fundamentally act in a value-oriented manner in all areas in the interests of our reputation and in the interests of our stakeholders. By acting transparently and through regular consultation, we reinforce the trust placed in our company.

To implement the values of a company in everyday business, a certain degree of formalization is necessary. The principles of flatexDEGIRO's corporate ethics are set out, among other things, in a Code of Conduct that applies equally to all companies in the Group. The Code of Conduct also contains guidelines on quality requirements, customer orientation, environmental protection and safety aspects, as well as on the topics of diversity and human rights. The responsibility for business ethics and compliance issues falls within the purview of the Compliance Office which is headed by the Compliance Officer, and who reports to the Board of Directors. The Board of Directors has ultimate responsibility for business ethics issues. Ethical risk assessments are also done prior to the commencement of new operations.

Further guidelines and policies in the area of compliance specify regulations on specific topics and guide our employees in acting with integrity. We used the year 2022 to further develop and expand the internal guidelines and regulations.



It is also important to keep an eye on our value chain. Since 2022, major suppliers (measured in terms of sales) are required to sign the Business Partner Code of Conduct as part of the legally binding agreements. It is based on the following rules:

- flatexDEGIRO Code of Conduct
- UN Global Compact
- UN Universal Declaration of Human Rights
- Regulations or core labor standards of the International Labor Organization (ILO)

This regulates the basis of cooperation, both with regard to social aspects and human rights as well as environmental protection and governance standards. flatexDEGIRO trusts that its suppliers and other business partners will comply with the above standards. Nevertheless, flatexDEGIRO reserves the right to control the compliance of suppliers and business partners with this Code of Conduct by requesting a self-declaration of the supplier, a declaration via third parties or the submission of certifications. Non-recognition and non-compliance in business transactions may lead to exclusion as a supplier or business partner.

Compliance

Compliance management at flatexDEGIRO

Compliance is a central component of the corporate culture and a prerequisite for the sustainable success of flatexDEGIRO. On the one hand, our compliance management is aligned with the applicable regulatory framework. On the other hand, we follow additional standards that we set ourselves through our Code of Conduct as well as internal guidelines and frameworks. The latter include a compliance control framework, anti-money laundering and anti-corruption guidelines, as well as general compliance guidelines and policies on data security and data protection. The overarching goal is to ensure compliance with all applicable laws, regulations and standards at all times. We constantly evaluate our procedures and strategies as well as new legal regulations and update our compliance program accordingly. All employees are asked to confirm/be aware of the Compliance and Anti-Money Laundering (incl. Anti-Corruption) Policy on an annual basis. All business relationships are also reviewed using various automated processes.

The Compliance Office deals strategically with all compliance-relevant issues in day-to-day business. It is headed by the Compliance Officer, who reports directly to the Executive Board and is also responsible for business ethics issues. The Compliance Office reports regularly to the Executive Board and Supervisory Board on the current status of the compliance management system and relevant issues.

The Group Money Laundering Officer is responsible for establishing and expanding a central unit for the prevention of money laundering. The officer also reports directly to the Executive Board and is responsible for all matters relating to compliance with business and customer-related security systems for the prevention of money laundering, terrorist financing, and other criminal acts in the Group. In addition, all employees upon joining the company are trained by the officer, and the training is repeated each year.

In the 2022 fiscal year, the focus of our work was on the continuous further development of compliance and money laundering-relevant processes to ensure compliance with all legal and regulatory requirements in the Group.

In 2022, the German Federal Financial Supervisory Authority (BaFin) conducted a special audit at flatexDEGIRO Bank AG in accordance with Section 44 of the German Banking Act (KWG). The audit report was submitted in November 2022. BaFin ordered that flatexDEGIRO Bank AG must ensure that its business organization is proper in risk management and money laundering prevention. A special representative appointed by BaFin monitors the implementation of the ordered measures. Depending on the progress made in eliminating deficiencies, measures may be adjusted following BaFin's review in consultation with the special representative. Initial measures to eliminate identified deficiencies have already been taken. In a structured process, the main focus of the Board of Management is on the rapid, efficient and complete processing and implementation of all necessary changes.

The Board of Management aims to address some material deficiencies already in the 2023 fiscal year. In particular are those concerns related to the applicability of credit risk mitigation techniques for financial collateral according to Art. 197 & 198 CRR.

In addition, the further increase in the degree of automation in internal processes and the adaptation of technical processes are to be driven forward in a focused manner.

Risk management and whistleblowing

Preventive and proactive work is required to prevent compliance incidents and violations. The basis for management is the risk strategy, which provides for the Group-wide compliance and money laundering risk analyses as central instruments for assessing and mitigating potential compliance and money laundering risks. As part of the overall business strategy, these risk analyses are conducted annually and cover 100% of the Company's activities in Germany and abroad. Compliance issues such as anti-corruption or anti-money laundering measures are organized through the use of monitoring software tailored to flatexDEGIRO. For the year 2022, all units relevant for the risk analysis were reviewed for corruption risks. This did not identify any significant corruption risks due to the business model. In the current Group-wide risk assessment, all significant compliance risks have been largely mitigated by establishing appropriate countermeasures.

In addition to risk management, flatexDEGIRO has implemented a whistleblower system for the preventive identification and combating of wrongdoing. The whistleblower system is available to all employees and can be accessed 24/7. Employees who make use of the whistleblower platform are protected from retaliation. Information on suspected cases, possible violations of the law and also incidents of discrimination can be

reported anonymously and confidentially. The exact procedure is set out in the Whistleblower Policy and regularly communicated to all employees through various channels such as the intranet. It is also available in the local and working languages of the company.

Compliance training

To maintain a high level of compliance performance and prevent compliance violations, compliance training courses are held for employees every year. We expect and require all employees to act in compliance with the law at all times, i.e. to strictly follow both internal rules and laws.

A core task of the Compliance Office is therefore to train and advise employees on the relevant compliance issues. In addition to general compliance training, the focus in the fiscal year was on anti-money laundering and anti-corruption measures, data protection, IT security, and occupational safety. These training sessions are held regularly - at least annually - to actively raise awareness among all employees. In fiscal year 2022, all employees received anti-corruption training. Specific employee groups also received anti-fraud training. Through the intensive training activities, the aim is to steadily embed integrity and compliant behavior more deeply in all employees on a sustainable basis. In addition, all members of the Executive Board and Supervisory Board were trained on anti-corruption policies and procedures in 2022.

In the fiscal year 2022, no case of corruption, discrimination or other compliance suspicions were reported or received via the flatexDEGIRO's whistleblower system.

Taxes

Compliance with the applicable tax obligations plays an emphasized role. flatexDEGIRO aligns its entrepreneurial actions in all jurisdictions and markets in which it operates according to this requirement. This applies both to its own affairs and to the affairs of customers, employees and business partners.

Tax compliance is generally achieved by involving the relevant specialist departments. This is regularly done by the management or other departments of the company in relation to business projects, transactions, legal changes or as part of a new product process.

Appropriately trained and experienced employees, including two tax consultants, are employed in the specialist departments. Regular training and continuing education measures ensure professional competence. The training courses also cover aspects of avoiding tax evasion or the evasion of international sanctions by employees. As a matter of principle, more complex tax issues are clarified with external specialist support. New legislation and changes in the legal situation are analyzed in advance by the specialist departments and their effects are validated with external consultants where necessary. The monitoring and management of tax risks is the responsibility of the specialist departments, which report regularly to the responsible Executive Board.

The annual tax returns are prepared and submitted by a tax consulting/auditing firm after input from the specialist departments. A review process is carried out as an additional measure to ensure compliance with applicable regulations. Tax consulting firms are also regularly involved in the preparation of annual tax reports for customers in order to ensure appropriate quality as well.

As a matter of principle, there is an open and transparent exchange with the tax authorities. The tax authorities are involved on a case-by-case basis in matters requiring interpretation so as to obtain clarification or an amicable outcome. Political influence on tax issues is not pursued. The consideration of tax concerns is generally taken up and subjected to a professional assessment, if necessary with the involvement of external consultants.

Taxes play a crucial role in enabling the state to provide important services to society, such as healthcare, education, housing and infrastructure. The state is responsible for tax laws and their implementation, but companies play an important role as taxpayers. flatexDEGIRO believes that a responsible approach to taxation is an essential component of sustainable business in a robust, functioning society. Meeting tax obligations is considered a duty to society.

The tax expense of flatexDEGIRO in 2022 amounts to EUR 41.1 million on income taxes. The taxes for 2022 are distributed among the following countries:

- Germany: EUR 38.8 million
- Austria: EUR 2.8 million
- Netherlands: EUR -0.7 million (income due to reversal of provisions)
- Bulgaria: EUR 0.2 million

Customers and Products

Customers and Products

Data protection and security

As of December 31, 2022, flatexDEGIRO managed around 2.4 million customer accounts and processed more than 67 million transactions in the fiscal year - two figures that illustrate why data protection and security are essential components of our business processes. This involves protecting the confidentiality of data, ensuring that it is not used for non-contractual purposes, and ensuring that systems are accessible and data manipulation and loss are prevented. Through strict measures, including in the Privacy Policy, we regulate the collection, use, disclosure and storage of user data that is disclosed to third parties, so that prior consent is always obtained.

Responsibilities

To ensure data privacy and security at all times, we have set up a complex security organization. Responsibility is borne by the Information Security Officer/IT Risk Manager, the IT Security Officer, and the Data Privacy Officer, who each perform different focal points of activity. They report monthly to the Board of Management and Supervisory Board on the current situation, developments and events in the area of IT security. The basis for legally compliant conduct and assistance for all employees are our data privacy policy and work instructions. Data subjects can raise concerns about the protection of their data via clear and easily accessible public mechanisms that are available 24/7. This includes clearly the collection, use, sharing and retention of user data, including the data transferred to third parties.

The information security officer informs and advises the management on all information security issues, initiates and monitors the relevant processes, measures and training courses, and serves as a contact person at all times, e.g., for the creation of emergency concepts or the investigation of information security incidents.

The IT Security Officer is responsible for the operational implementation of requirements within the scope of IT security. This primarily includes the search for possible vulnerabilities and preventive technical measures.

The data protection officer is responsible for advising and informing the management and our employees on data protection issues. In addition, he monitors compliance with the requirements of the General Data Protection Regulation (GDPR) and internal data protection agreements and works closely with the relevant supervisory authorities.

Annual privacy risk assessment is conducted. The IT risk manager coordinates IT risk analyses in the company, informs the management about the current IT risk situation, controls the appropriate design of security measures and bears responsibility for the IT risk register.

Systems

We ensure data privacy and security with the help of state-of-the-art software and cutting-edge technologies. Among other things, our systems are secured by a multi-level firewall and endpoint protection

on all devices. We also have distributed denial of service (DDOS), enhanced e-mail protection and a multiple redundancy concept for data storage and processing. - data storage and processing.

With regards to access controls, a process for appropriate IT authorization allocation has been implemented. This process is designed to ensure that each employee only has the rights he or she needs for his or her job. This process is governed by a work instruction on authorization management. A corresponding specialist department has been set up for assigning rights and profiles in the applications and for recertification management. Also important is the company's technologies, platforms, or practices are regularly assessed to make sure that customers' privacy is not at risk.

In addition, the two data centers ensure the maintenance of operations. The data centers are certified in accordance with ISO 27001 (information security management). This is confirmed by an independent auditor through annual audits. We will continuously review changes in the Group and adapt any processes to maintain the highest standards.

As part of the cooperation with **UP KRITIS**, we work with other operators of critical infrastructures, their associations, and the relevant government agencies to ensure supply through infra structures that are essential in Germany.

All cyber security incidents on flatexDEGIRO identified in fiscal year 2022 were successfully averted by our systems and processes. In particular, an increase in phishing and ransomware attacks was recorded, which target the integrity and confidentiality of the company and customer data. There was no outflow of customer or company data due to a cyber attack. As part of the integration with DEGIRO, the infrastructure, applications, workflows, and IT security processes continue to be harmonized, as will be the case in the financial year 2022.

Customer orientation

As an online broker, flatexDEGIRO provides various trading platforms and access options for trading securities products. The offer is aimed exclusively at independent traders and investors, as flatexDEGIRO offers an exclusively advisory-free business under its brands. Transparent pricing models, favorable conditions and a comprehensive and independent product offering are among the cornerstones of our business model. We strive to exceed our customers' expectations.

The Board of Management is responsible for managing customer expectations and consults with the specialist departments on all key issues at regular committee meetings. Important functions such as customer satisfaction, service, and complaint management are the responsibility of the Head of Banking Center, who reports to the Management Board. Both the Head of Banking Center and the Management Board receive several reports, including weekly reports and a monthly report.

It is in line with our ethical standards to act openly and transparently in all areas of customer communication and customer processes. This is expressed, for example, in cost transparency vis-à-vis customers. Before placing an order, customers can easily view the respective costs in detail. In addition, one of our basic principles is that there are no hidden charges to customers.

flatexDEGIRO consults regularly with customers at various levels. We listen to customer wishes and needs in direct discussions and through open exchanges at investor fairs. Roadshows, customer events, and training events that include feedback discussions with participants are regularly held. Digital formats such as videos, webinars and virtual trader roundtables are also offered.

Customer satisfaction and customer feedback

Customer satisfaction is regularly surveyed as part of standardized customer surveys. The goal is to determine service satisfaction as well as customer expectations regarding offered and desired products and services, thus deriving the potential for further developments at flatexDEGIRO. In addition, there is a dedicated department (Client Quality Assurance) specifically dedicated to monitoring and improving the customer experience. The function is responsible for improving and ensuring quality standards in all business practices and processes within flatexDEGIRO. Customer experience monitoring and reporting systems provide insights from the customer's perspective, helps to assess the quality of interaction and evaluation, and even allow preemptive actions. In 2021, we launched an internal customer experience initiative - through various events and publications, we raised awareness across all teams (customer-facing, but also backend).

In the fiscal year 2022, the Net Promoter Score (NPS) for flatex was increased to a value of 46. (previous year: 43). For the DEGIRO brand, measurement of the NPS was started for the first time in 2022. At the end of 2022, an NPS of 55 was determined for DEGIRO.

We are strengthening a customer-focused culture by collecting continuous feedback and optimizing the business processes on this basis. All customers are offered a variety of ways to contact us - from telephone and e-mail to communication via web branch and, in the future, directly in the app. The employees in Customer Service are highly qualified - banking training, several years of professional experience in the financial services sector, or a degree - are among the basic requirements. Employees are also provided with ongoing training, for example, on the legal framework and product specifications. The training spectrum covers frontline staff, sales teams, and relevant third-party personnel to ensure that products and services are appropriate for customers' needs and income.

All customer communication, and thus all customer complaints are documented and evaluated in a CRM tool. This tool is also constantly being further developed. Our customers also have the option of submitting their concerns at any time via several channels that are externally accessible 24/7.

The overriding goal in all business areas is to steadily reduce the number of customer complaints, or to resolve them in the best possible way. To this end, a new customer service center in Hamburg was opened in 2021. Customer service staff at existing locations are also steadily expanded.

The Group's brokerage business received recognition in numerous publications throughout Europe in the past fiscal year. For example, flatex was named "Best Online Broker" in Germany in the "Brokerwahl" customer vote. In addition, flatex took the top spot in this vote both as the best "ETF & Funds Broker" and, among particularly trading-active customers, as the best "Daytrade Broker". flatex is thus the only provider in this vote to cover the entire range of online brokerage in outstanding form. Surveys by BrokerVergleich also saw flatex again as the "Best Fund and ETF Broker". In 2021, flatex was already convincing in this category. Also for the second year in a row, the Deutsche Gesellschaft für Verbraucherstudien mbH awarded the seal "App-Award Online-Broker" to flatex. In addition, flatex again received the "Highest Recommendation 2022" award from Focus-Money in the direct banking category. DEGIRO was again

honored in several international comparisons - among others as "Best Discount Broker" and "Best Broker for Stock Trading" by BrokerChooser. Rankia, one of the world's leading financial communities with more than 600,000 registered users, named DEGIRO "Best Stock Broker 2021" in Spain, Portugal and Italy. In Spain, the top spot was achieved for the sixth time in a row, and in Portugal for the third time. In addition, DEGIRO received the title of "Best ETF Broker" from Rankia in Portugal. In Italy, DEGIRO was named "Best Online Broker" and "Best Broker for ETFs and Investment Funds" by QualeBroker. In Austria, the Gesellschaft für Verbraucherstudien named flatex the test winner in the "Online Broker" category.

Innovative products and services

In our business, "digital proximity" to the customer is crucial. In addition to transparent communication and rapid provision of the relevant information, this includes a stable brokerage platform with state-of-the-art functions, innovative products and processes. The added value for our customers comes from the interaction of "product", "platform" and "price". In addition to an attractive price-performance ratio with an extensive, innovative and constantly growing product portfolio, continuous investment in the platform is an essential component to ensure continuous availability even on particularly busy trading days.

The goal is to further simplify capital market access by expanding functionalities for additional product groups, such as ETF and fund savings plans, as well as exchange-traded products (ETPs). To achieve this, we have implemented an innovation process based on two pillars.

The first pillar is a structured process for continuous improvement of the product and service portfolio. This includes a detailed analysis of the specialist, technical and (regulatory) legal requirements. All specialist departments, such as Marketing, Banking Center, Legal and IT, are involved in this process. In addition, external specialists, for example from the areas of Design Thinking and Behaviour Scientists, are also consulted at an early stage. The process is coordinated by Product Management.

The second pillar is a creative approach based on cooperation and exchange. On the one hand, we maintain a dialog with other service providers and product suppliers in the financial industry about experiences, ideas and approaches to solutions. Equally important, however, is the exchange of ideas outside the financial community in order to gain additional impetus from other specialist areas. That is why we work together with partners from research and science - universities, national and European institutions - at all our locations.

Responsibility for the innovation process lies with R&D (research and development) and product management. Decisions on the use of synergies, future orientation and concrete next steps are made in the Requirements Board. The Executive Board is represented on the Requirements Board and is therefore directly involved in the processes.

As absolute online brokers, the brands do not maintain branches, but provide various trading platforms and access options for trading securities products. These are being further developed on a user-oriented basis in order to reach additional customer groups. For example, flatex in Germany has been offering its customers an optimized user interface (flatex next) since the end of November 2020. With 4.5 stars in the Apple App Store, flatex next is currently one of the best-rated online brokerage apps in Germany. A rollout of flatex next for desktop apps is planned for 2023.

Promotion of sustainable investment

flatexDEGIRO would like to raise customers' awareness of sustainable investing and make them aware of the advantages of this form of investment. Sustainable investments can be interesting both from a yield perspective and in terms of their contribution to environmental protection and a more socially just society. By promoting this form of investment, a contribution can be made to a more sustainable economic development. It is therefore the goal of flatexDEGIRO to make ESG products visible, for example, shares of companies that pay attention to the environment, society and good corporate governance. For this purpose, there is already the category "**flatexgreen**" in the stock, ETF, and fund search, which is constantly being expanded.

flatexDEGIRO has developed a comprehensive product portfolio in the area of sustainable investments over the past years. Due to the extensive range of stock exchanges and trading venues, our customers have access to a correspondingly large number of sustainable products. We also maintain partnerships with renowned providers of sustainable investment products - such as BlackRock, Amundi or VanEck. This enables us to offer our customers attractive conditions for the corresponding products.

The aim is to continue organizing seminars on the topic of "sustainable investment" in cooperation with providers of sustainable investment funds and to conduct educational work with regard to sustainable financial products.

Employees

Employees

The long-term entrepreneurial success of flatexDEGIRO is largely based on the competence, commitment and flexibility of the employees. Interdisciplinary teams drive ideas and develop new, networked solutions for the customers. Together, we take advantage of opportunities offered by the dynamic environment. In addition to operational growth, this also includes the further internationalization of the business through the merger with DEGIRO.

In May 2021, the merger of DeGiro B.V. into flatexDEGIRO Bank AG was completed, with retroactive effect from January 1, 2021. Immediately after completion of the transaction, DEGIRO became a branch of flatexDEGIRO Bank as a result of the merger. During the entire process before and after the merger, there was a great deal of overlap in the values that had previously been lived, so that a common corporate culture was quickly established consistent with the motto "One team - one dream".

Our human resources management is geared to supporting the dynamic development of the company while at the same time focusing on the individual. The merger creates the possibility to offer all employees an international working environment. The goal of the work at HR is to harness synergies and support employees so that they can contribute their skills in the best possible way during this phase of strong corporate growth.

Attracting and retaining the best employees is crucial to our success. In view of the strong global competition for the best specialists and managers, an attractive and convincing overall offer for employees is becoming increasingly important. We are therefore continuously working on measures to increase the attractiveness of the flatexDEGIRO Group - especially on the European labor market.

To get in touch with potential applicants, we already rely heavily on the use of digital platforms such as the country-specific career websites and global and regional social networks. This enables us to address the various target groups in an appropriate manner. In addition, all employees are encouraged to indicate potential talent from their own network, as we believe that convinced employees do the best advertising by word of mouth.

Since 2021, we have been implementing talent search against the backdrop of the Corona pandemic primarily with digital solutions, but we also participate in face-to-face events. The goal is to continuously expand our digital presence and also provide the best possible information about flatexDEGIRO as an employer virtually. For example, we are represented at digital trade fairs and conferences, conduct digital excursions for students at various universities for locations in Germany, and organize specialist presentations for junior staff. The virtual contact enables a demand-oriented, flexible and location-independent approach. This is how we continue to succeed in attracting and recruiting talent.

In addition, we continuously participate in specific career events that serve to directly address and attract especially female junior talents from various specialist areas. With various initiatives such as podcasts, career fairs and networking events aimed specifically at women, or on our social media channels, we focus in particular on our female employees as female role models.

Since the beginning of 2022, we have implemented a digital onboarding process for all sites that accompanies new employees and their managers in the phase leading up to their first day at work and beyond the onboarding period. The aim is to ensure a successful first day at work, and to build a bond between new employees and their future team at an early stage. This is achieved, for example, by sending emails with information about the business unit and the team.

In addition to the digital onboarding process, however, it is also important that all new employees get to know each other in person. To this end, we have introduced an international physical onboarding event since the beginning of 2022. The onboarding event is also used to introduce the new employees to the various specialist departments through presentations by a department head.

At the same time, it is important to counteract demographic change. Initiatives to secure young talent are anchored in the strategic HR agenda. These include, for example, collaborations with universities, new trainee programs with a focus on digitization, or more generalist training. But the comprehensive range of training opportunities, innovative qualification measures and the possibility of various development paths are also intended to make the Group attractive to young talent.

Human resources management

The human resources organization has offices in Frankfurt am Main, Amsterdam and Sofia. The Chief Human Resources Officer reports directly to the Chairman of the Executive Board.

In 2021, we proceeded with the introduction of a dedicated HR management system and released it for operational use as planned in the second quarter. This ensures that all relevant HR information can be presented and accessed in a single system. It includes essential HR processes from recruiting to onboarding/offboarding, as well as all training courses offered. They are offered and accessed via the platform. In the case of mandatory training courses, their timely completion is tracked. In addition, a global, uniform database is available for the first time. By using SAP **SuccessFactors®** as a professional HCM solution, flatexDEGIRO AG supports its employees during every phase of the employee lifecycle and simplifies global collaboration among employees in their daily work. In the 2022 fiscal year, the system was expanded to include a digital employee assessment and an international recruiting platform.

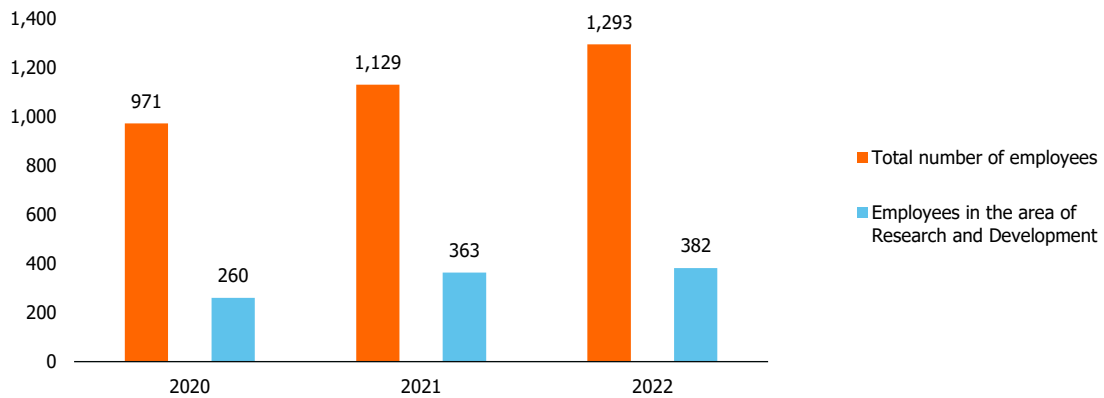
In addition to digitization, HR focused on other topics in 2022. These included participation in the "**TOP EMPLOYER**" certification. This successful certification reflects our commitment to providing an outstanding employee experience and developing a first-class HR policy. In particular, it helps to further successfully position the flatexDEGIRO employer brand in the market.

All strategic decisions on the subject of "health protection and occupational safety" are also managed centrally. The measures to be implemented in the fiscal year are developed by the HR department and coordinated with the Executive Board. The local contacts decide on sensible additions at the individual sites.

Staffing level

As of December 31, 2022, flatexDEGIRO employed 1,293 people at 14 locations across Europe. Compared to the previous year, this represents an overall increase of 14.5%, which is largely attributable to targeted new hires in the areas of customer service, IT, securities trading and regulatory affairs.

Total number of employees, share of R&D employees ¹

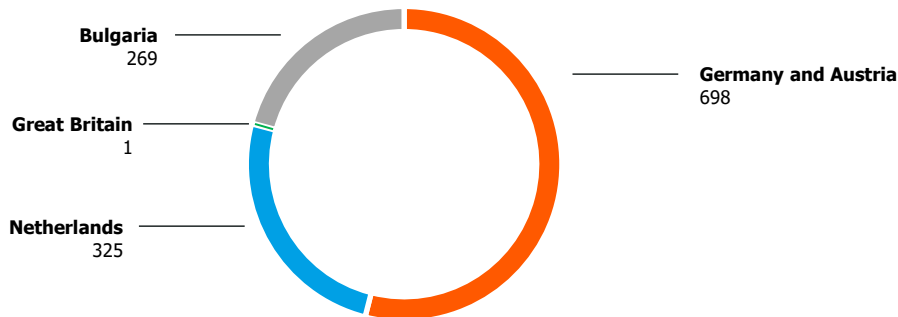


¹ flatexDEGIRO employs 40 temporary staff (not included in total number).

Total number of employees, broken down by age

	2022	2021	2020
Total number of employees	1,293	1,129	971
Under 30	32.0 %	33.7 %	32.7 %
30-50	56.0 %	53.0 %	54.2 %
Over 50	12.0 %	13.3 %	13.1 %

Total number of employees, broken down by countries/regions



Education and training

Talent development

Against the backdrop of demographic change, flatexDEGIRO is investing in promising talent - trainees and students. Seven young people (as of December 31, 2022) are being trained as IT specialists for application development and system integration as well as bank clerks in the dual system. In addition to technical skills, we attach importance to teaching our corporate culture, teamwork and customer orientation.



Since 2015, flatexDEGIRO has been cooperating with the Frankfurt School of Finance & Management and sponsoring the first dual FinTech bachelor's degree called "Digital Business". The aim is to provide students with a practical, dual education that reconciles the different requirements of IT and financial services. The company currently employ 15 students from three cohorts in Germany, who work two to three days a week, and also during the lecture-free period.

The goal is to promote competent new talents, and to attract them to the company after they have completed their training or studies.

To give employees and new colleagues the opportunity to get to know and understand the company and its sites/divisions in full, a specially developed trainee program is being offered. This enables participants to gain insights into different areas over a period of around 24 months so that they can then make the right decision for their further professional development.

Development and training

flatexDEGIRO expects a high degree of professionalism and willingness to learn from its employees. Diverse tasks and interdisciplinary projects offer individual development opportunities, which are promoted through targeted training opportunities. The aim is to train all employees according to their personal development needs and areas of responsibility. Learning and development are key success factors for a positive corporate culture. The skills and competencies of the employees are crucial for profitable growth and sustainable success. That is why we want to further modernize the learning culture and promote continuous, self-directed learning, including learning from others even more strongly. Employee development at flatexDEGIRO is guided by the motto "There is talent in everyone!". This means that development opportunities and support are open to everyone equally.

We understand development as much more than a promotion or a change of job, namely, the expansion of one's own experience and skills. In regular development meetings, which are part of the annual employee appraisals, employees work with their managers to come up with ideas for their individual development and define specific training and development measures aimed at personal and professional competencies. In the training and development measures, we follow the "70-20-10" philosophy: We focus on the elements of "learning from experience" (70%), "learning from others" (20%) and "learning through training and with media" (10%).

Our learning and development offerings cover a wide range of learning objectives: Career entry, knowledge enhancement, personal development, and leadership development. Digital learning formats are playing an increasingly important role in our development offerings. Even before the Corona pandemic, the development offering for managers and employees was revised to meet the challenges of digital transformation and a modern working world with the help of appropriate learning formats and -content with the help of appropriate learning formats and content.

The continuous development of our employees' digital skills will continue to be crucial in the future. The portfolio includes self-learning offerings as well as individual consulting and support for teams and managers in the digital transformation. As part of the digital transformation, significant progress has been made in digitizing the training offering. Today, all employees enjoy an enhanced learning experience and optimized access to the entire training catalog. The digital training offerings are made available to employees via the HR management system. Mandatory training such as compliance, data protection, etc. is also available to

employees via the HR management system. In addition, the numerous targeted online training formats in the business and service units also provide training on specific technical content.

With an average of well over 100 training courses per year, a wide range of topics are covered - from English lessons and area-specific training events, to in-service studies. While most of the training courses during the Corona pandemic were held online only, more face-to-face training courses were provided for employees again in 2022. The focus of the training courses in the 2022 fiscal year was on the development of professional skills.

We are constantly working on the personnel development formats and a qualified exchange and knowledge transfer of our specialists and managers. For example, a High Potential Circle has been institutionalized at flatexDEGIRO for several years. Due to the corona pandemic, specific further development measures could mostly only take place virtually in 2021. The program will be continued in 2023. In addition to the High Potential Circle, another training program aimed at the managers was established in 2022 with a focus on leadership. Tailored trainings are offered to managers who are particularly high performers in our succession and talent pipeline (high potential training). Action plans are agreed that include measures such as training, executive coaching or mentoring, and interactions with members of the Executive Board and Supervisory Board.

Leaders play a critical role in creating the operating climate and culture we strive for: A culture that enables our employees to thrive and keeps our company safe. The development of our leaders has always been a central concern of the flatexDEGIRO Group. The Leadership Model describes the Group's view of the skills that underlie effective leadership. It reflects the strategic requirements of the flatexDEGIRO Group and draws on rigorous scientific research to identify the knowledge and skills at the core of effective leadership.

While the fundamental principles of leadership are constant, leaders must continually develop themselves by applying their skills in a disruptive and changing environment. They must simultaneously build the capabilities of the teams they lead and create an environment that supports continuous learning, is adaptive and inclusive. At the same time, driving change and innovation does not have to come at the expense of customers' interests. Behavior and business practices must be guided at all times by a clear sense of purpose and principle.

Important steps have been taken to respond to the changing requirements. The leadership development program was redesigned in 2022 to provide a more personalized, modular approach that allows leaders to learn when and how they need to. Based on the revised leadership model, all learning opportunities are designed to prepare our leaders for their future roles.

The leadership offerings take a modular approach to provide experienced leaders with more customized training, allowing them to choose topics such as coaching, feedback, building a high-performing team, and leadership styles. These virtual classroom workshops are complemented by additional resources such as on-demand videos, professional articles or podcasts. The range of learning opportunities is constantly evolving based on continuous feedback from leaders and the strategic needs of the group.

Health protection

Part of our self-image as a responsible employer is to protect the health of our employees. That's why we implemented a uniform Groupwide occupational safety strategy in 2022, for which the Executive Board bears overall responsibility. An important step in this process was the Group policy "Health protection and occupational safety". Management works with employees to review and update this and other policies and procedures. We recognize that workforce consultation and participation in our safety system is critical and improves decision-making on workplace health and safety issues. Consultation is also incorporated into the risk assessment process and the development of safe work practices. Suggestions for changes and improvements to policies, procedures or safe work practices are encouraged through reports to management. Meetings are held at regular intervals to advise and inform employees on safety issues.

flatexDEGIRO offers all employees the opportunity to work mobile from home. In the course of the Corona pandemic, the options for mobile and flexible working (work@home policy) were significantly expanded. Employees can work on a mobile basis in defined time models and flexibly schedule their working hours. In 2022, we also implemented further measures to protect the health of our employees. Where on-site presence in the offices is necessary, sufficient numbers of protective masks and COVID 19 rapid tests will be made available to the employees concerned. As a further measure to ensure compliance with the minimum distances, we have decided to introduce the "deskbird" app. This gives all employees the opportunity to book a workstation for their presence in the office.

In 2022, health-related preventive examinations and training, among other things, were offered on site. In the fall of the year, we initiated the opportunity for employees to receive a flu vaccination. Online training was also provided on the topics of occupational health and safety, computer workstations and first aid, as well as instruction in fire protection. In addition, an on-site occupational health examination was offered. In addition, "Healthy Days" were held at individual sites to provide employees with targeted information and training on specific topics.

The greatest challenge for the health protection of the employees is the sedentary nature of computer workstations. This challenge is addressed through preventive medical checkups and a modern ergonomic working environment - for example in the form of height-adjustable desks and posture-promoting chairs. Due to the intensive use of mobile working and the promotion of New Work, which is also planned for the future, our responsibility as an employer is expanding in this area. Accordingly, we have made targeted training on occupational safety and health protection for mobile working mandatory in 2022.

We offer a wide range of preventive measures such as stress management and exercise programs.

We work with external experts who also provide employees with psychological, educational and financial support to help them balance family and career, for example by organizing courses, workshops and employment opportunities for children, as well as a service hotline for initial telephone advice on personal life management challenges. Our managers and works council members can also contact our external experts for support on issues relating to their role.

Due to flatexDEGIRO's business model, only a few reportable commuting and work-related accidents were recorded among the employees in the reporting year. Ten occupational/travel accidents were recorded in fiscal year 2022. This means that the rate of reportable accidents in the fiscal year is 0.8%. Despite this

currently already very low rate, it is important for flatexDEGIRO to constantly promote the safety culture in the company.

Employee satisfaction

The satisfaction of our employees and, consequently, their loyalty to the company are among our most important measures of success. Our responsibility as an employer is to retain employees in the current phase of very dynamic corporate growth and continuous change.

Importance is placed on active and open communication. The Executive Board informs all employees directly of all important developments and events at Group level in town hall calls, or via e-mail. Regular exchanges take place within the teams with the respective supervisors. The management of the specialist departments and the teams as well as selected specialists from the Key People Circle regularly engage in direct exchange and constructive dialog through personal meetings and calls.

Direct employee feedback is also an essential and important element for good and targeted HR work. Against this background, a global employee survey was introduced in 2021, which was conducted again in 2022. With a participation rate of over 81% (previous year: 74%), the participation rate increased by 7 percentage points compared to the previous year. It has become clear that employees are using the feedback tool.

An average length of service of 4.3 years is proof of flatexDEGIRO's attractiveness as an employer. Total fluctuation in 2022 was 17.9% (previous year: 16.6%).

Fluctuation

	2022	%	2021	%	2020	%
On the basis of own terminations	250	15.9	144	10.6	107	9.9
Total fluctuation	282	17.9	224	16.6	112	10.3

Work-life balance

Changes in society bring with them different expectations regarding work-life balance. At flatexDEGIRO, this has already played a central role in the past. Through flexible working time models, we want to unburden employees in the various phases of their lives, and offer them opportunities to individually combine their professional and private lives. We have been offering various flexible working time models for several years. These include flexible working hours, trust-based working hours, sabbaticals, partial retirement and partner months. In particular, the return of parents to working life is encouraged by various part-time models and the assumption of childcare costs until the child starts school. In addition, our external expert provides advice and support on topics such as home care and care for the elderly. With an aging workforce, caring for relatives is becoming increasingly important. Accordingly, our workshops and consulting services on the subject of care are increasingly in demand.

In 2022, flatexDEGIRO employees again had the option of working remotely (and hybrid). All employees are or were equipped with the necessary equipment. Due to the high acceptance of mobile working, the goal is to make more intensive use of the possibilities of *New Work* beyond the pandemic and continuing to

offer them to all employees. Among other things, we will continue to promote mobile working after the corona pandemic by making the appropriate infrastructure available to the employees.

Total number of employees, additionally broken down by full-time/part-time

	2022	%	2021	%	2020	%
Total number of employees	1,293	100.0	1,129	100.0	971	100.0
Thereof full-time	1,090	84.3	951	84.2	825	85.0
Thereof part-time	203	15.7	178	15.8	146	15.0

Diversity

flatexDEGIRO values the different qualifications, ideas, experiences and perspectives of all employees. Diversity is a crucial prerequisite for the success of an internationally operating company and therefore also an important personnel policy concern of the flatexDEGIRO Group. We want to attract, promote and retain the most suitable talents - regardless of cultural background, nationality, ethnicity, gender, sexual orientation, physical abilities, religion, profession and experience. Of particular importance is that we try to achieve equality in gender pay based on comparable experience and qualification. We also monitor the data on gender-pay gaps with a view to closing the gap. Our managers at all levels receive training and guidance from Human Resources to foster "diverse teams" in the above sense, where employees respect each other, can develop their full potential and thus succeed together. Our company promotes diversity in the work environment and respectful and unprejudiced interaction. For example, we celebrate our diversity and each month feature an employee and their cultural group, traditional festivals or holidays in our monthly newsletter under the heading "celebrate the difference".

Our self-image includes an appreciative corporate culture that offers all our employees equal opportunities for advancement. Maintaining such an environment is the responsibility of every employee. Our managers lead in a manner that fosters an environment of respect for each individual. The Company is firmly committed to fostering a supportive and inclusive culture throughout the workforce. It is in our best interest to promote diversity and eliminate discrimination in the workplace. Our Code of Conduct states that flatexDEGIRO will not tolerate discrimination based on age, gender, ethnicity, disability, sexual identity, religion or belief. In addition, we adopted a "Diversity and Inclusion Statement" in 2021, which regulates cooperation even more precisely and describes it in more detail. In addition to equal rights for women and men, the diversity of cultures and generations as well as equal opportunities for lesbian, gay, bisexual, transgender and intersex (LGBTI) employees are among the cornerstones of our commitment to diversity and inclusion. Criteria such as maternity or marital partnerships have also been explicitly excluded as grounds for discrimination. Topics relating to respectful interaction with one another are also regularly addressed as part of compliance training.

Any violations of our guidelines can be reported at any time by employees to their direct supervisors, the Data Protection Officer or the Works Council (flatexDEGIRO Bank AG). Anonymous reporting channels are also available. Incidents of any kind are immediately followed up and processed - they can also lead to termination. No incidents of discrimination were recorded at flatexDEGIRO in fiscal year 2022.

The inclusion of people with disabilities is another component of our diversity strategy.

Barrier-free access to workplaces and work equipment is just as high a priority for us as implementing accessibility in our digital offerings on the customer side. We are also well positioned following the Barrier-Free Accessibility Strengthening Act, which came into force in 2021.

In fiscal year 2022, the proportion of female employees decreased slightly from the previous year's level (32.5%) to 31.0%. At the same time, the proportion of women in management positions increased from 21.8% in 2021 to 25.6% in 2022.

Total number of employees, broken down by gender

	2022	%	2021	%	2020	%
Total number of employees	1,293	100.0	1,129	100.0	971	100.0
Thereof women	401	31.0	367	32.5	307	31.6
Thereof men	892	69.0	762	67.5	664	68.4

Proportion of female managers

	2022	2021
Women in the first two levels below the Executive Board in %.	12.7	11.3
Total women in management positions in %.	25.6	21.8

Environment

Environment

It is the declared goal of flatexDEGIRO to contribute to environmental and climate protection by conserving resources and minimizing environmental impacts from our business activities. The flatexDEGIRO Code of Conduct also creates the framework for responsible action in terms of environmental protection. flatexDEGIRO is committed to regularly reporting on environmental issues, through internal and external channels.

Responsible for active environmental management at flatexDEGIRO is the Sustainability Officer, who was appointed in fiscal year 2020 and is ISO certified. The Sustainability Officer continuously coordinates all environmentally relevant decisions with the Management Board, to which there is a direct report. The Officer also initiates the binding definition of environmental targets and is responsible for the implementation of agreed measures in the specialist departments. The Executive Board assumes ultimate responsibility for all environmental issues in the company.

Energy and emissions

Environmental management

For a medium-sized company, using energy as sparingly as possible represents the greatest lever for flatexDEGIRO's continuously improving environmental performance, in addition to business travel. The reduction of direct and indirect energy consumption, and thus the avoidance of greenhouse gas emissions, which contribute significantly to global warming, is the focus of our environmental management. All reported emissions data cover virtually all of the company's operations. flatexDEGIRO is also committed to engaging with suppliers to improve environmental performance.

As part of the Group risk management, relevant environmental regulatory developments are monitored. They include; the Taxonomy Regulation, the Sustainable Finance Disclosure Regulation (SFDR), the BaFin Guidance Notice on Dealing with Sustainability Risks, the Corporate Sustainability Reporting Directive (CSRD) in conjunction with the European Sustainability Reporting Standards (ESRS), the technical implementation standards (ITS) on supervisory disclosures of ESG risks pursuant to Article 449a CRR of the European Banking Authority (EBA), and the Minimum Requirements for Risk Management (MaRisk). We do not expect any significant adverse effects from this thanks to our innovative business model and low corporate carbon footprint.

Energy consumption and reduction measures

flatexDEGIRO takes its own environmental responsibility seriously and pursues the goal of reducing the respective energy consumption at all locations, or bringing about a reduction in emissions through the use of green electricity. In 2022, all German office locations switched to green electricity. flatexDEGIRO is committed to close the emissions gap between current emissions and targeted emissions in line with the decarbonization goals. More budgetary allocations for innovative ways to narrow the emissions gap are part of the strategies employed.

A natural lighting concept is pursued for the buildings used by flatexDEGIRO. Within the scope of structural possibilities, new locations equipped with as many glass elements as possible is prioritized, so that the energy requirement for lighting is reduced to a minimum. Energy-efficient LED lighting is standard at all locations.

Intelligent control of building technology is also standard at all new sites, so that high energy efficiency are recorded by controlling consumption and optimized controlled usage behavior. This prevents the air conditioning from working against the heating, for example. A temperature in a predefined range is set for each room and the system decides whether the heating or air conditioning is needed for this.

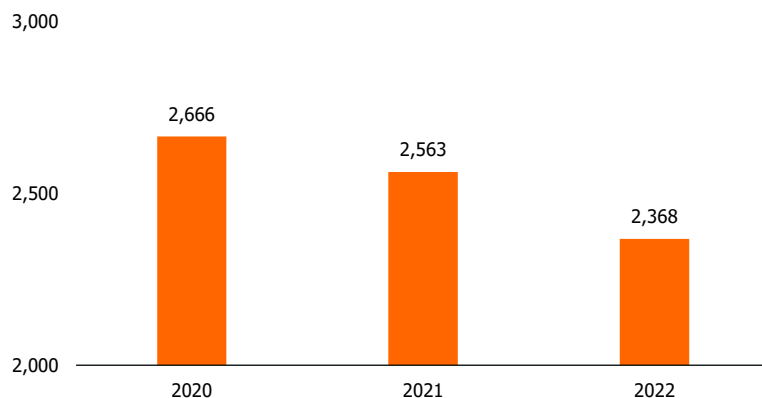
The relocation of our headquarters within Frankfurt to the "Omniturm" in fiscal year 2022 has also been carried out in accordance with the requirements for a sustainable office infrastructure. The building is certified sustainable and digital, i.e. the tower has been awarded the LEED sustainability certificate and is WiredScore-certified for its digital infrastructure, both times at the highest Platinum award level.

The business model requires the use of data centers and server infrastructure, which can be very energy- and emissions-intensive. We constantly review and optimize the infrastructure and invest in new technologies to increase performance and - independently - reduce energy requirements.

To verify the measures implemented, we had an energy audit carried out in the past fiscal year in accordance with DIN EN 16247-1 for all locations in Germany by a certified external service provider (energy management officer in accordance with DIN EN ISO 50001 and registered energy auditor in accordance with DIN EN 16247-1). In the final report, it was emphasized that we have already placed great value on modern and energy-saving technology and equipment in the past and that our rental spaces meet high energy standards.

The switch from classic PCs to thin clients or notebooks could already be successfully completed in 2021. Last but not least, the development of our energy consumption confirms the statements of the energy audit. Despite a growing number of employees, electricity consumption was further reduced when compared with the previous year.

Electricity consumption of the sites in megawatt hours (MWh)¹



¹ The energy consumption figures for the Kulmbach site in the years 2020 to 2022, Sofia in 2020 and Amsterdam in 2022 were estimated. Previous year's values adjusted due to available utility cost statements.



CO₂ emissions and reduction measures

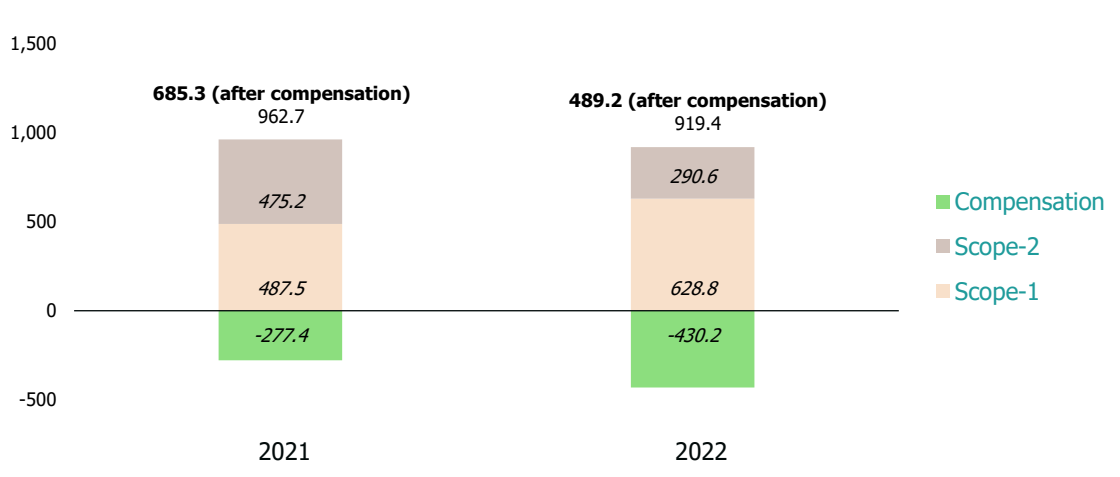
flatexDEGIRO does not own any buildings, but acts as a tenant at all locations. Natural gas is used to generate heat at various locations, so that the resulting direct CO₂ emissions (Scope 1 emissions) were determined. Furthermore, direct CO₂ emissions (Scope 1 emissions) are emitted through the use of own vehicle fleet. While the use of the vehicle fleet was weaker in 2021 due to the Corona pandemic, there was an increase in emissions in the past year. Emissions from the use of the vehicle fleet were fully offset. Further explanations regarding existing and planned measures to reduce these emissions are explained in the section "Mobility behavior at flatexDEGIRO".

Another significant part of our emissions results from the purchase of electricity, heating and cooling (Scope 2 emissions). In 2022, 290.6 metric tons of CO₂ were emitted (site-based). The decrease compared to the previous year is due to the conversion of all German office sites to green power, after the data centers we operate in Germany have already been running on green power for several years. To further develop environmental data collection in this area, we are evaluating the implementation of a data collection tool that will be used in the future to record, analyze and document all directly and indirectly caused emissions in accordance with the requirements of the Greenhouse Gas Protocol and ISO 14064-1. The introduction of the environmental data collection tool is expected for the end of 2023.

To reduce the absolute level of Scope 2 emissions, we have been purchasing low-emission green electricity, i.e. electricity from renewable energy sources, at all German sites since 2022. We aim to extend the switch to green power to all European office sites by the end of 2024.

The sum of Scope 1 and Scope 2 emissions was reduced from 962.7 metric tons of CO₂ (2021) to 919.4 metric tons of CO₂ in 2022. Adjusted for offsetting services, the balance of our net Scope 1 and Scope 2 emissions is reduced from 685.3 metric tons of CO₂ (2021) to 489.2 metric tons of CO₂ in the past fiscal year (-28.6%).

Scope 1 and Scope 2 emissions in metric tons of CO₂ (t)¹



¹ According to preliminary CO₂ balancing for Scope 1 emissions from heat generation and vehicle fleet and Scope 2 emissions from the purchase of electricity, heating, and cooling.

flatexDEGIRO also avoids emissions that occur in upstream or downstream parts of the value chain (Scope 3 emissions). In our supply chain, for example, we are guided by sustainability standards: we procure



hardware, primarily notebooks, monitors, servers, and switches, directly from the manufacturer in a climate friendly manner, thus avoiding additional routes via intermediaries. In cooperation with our most important suppliers, we exchange information on current product developments and also take sustainability aspects into account. All products are subjected to intensive testing in advance to minimize failures. Our focus on the use of energy-efficient and stable IT solutions not only benefits the environment, but also our expenditure on operating costs. We also want to become more climate-friendly in contact with our customers in the future and have been sending correspondence within Germany in a climate-neutral manner since mid-2021.

Mobility behavior at flatexDEGIRO

Since the transport sector contributes significantly to environmental pollution, it is our declared goal to work towards climate friendly mobility. flatexDEGIRO has been pushing digital working to reduce the number of business trips, and not just since the Corona pandemic. To this end, all locations have been equipped with new, professional video conferencing technology since 2019 to ensure a smooth digital exchange. We have also installed the conferencing software on all employees' computers so that all employees can use it from home or on the road, regardless of the conferencing technology at the sites.

In the future, it is intended to record emissions from travel activities. To this end, various solutions and providers are currently being examined with which it is possible to determine the underlying emissions on a cause-related basis. We plan to evaluate various compensation models for the reported emissions. Irrespective of the quantitative measurement of emissions, our travel policy has been adapted to ensure that, taking ecological factors into account, preference is given to low-emission means of travel or that the CO₂ emissions are offset.

Since April 2021, we have been directly offsetting all emissions generated by vehicle use with a CO₂ -neutral fuel card. Thus, in fiscal 2022, a total of 430.2 metric tons of CO₂ emissions were offset via carbon offset projects run by the **myclimate** organization in accordance with the Gold Standard. In the reporting year, we adjusted our fleet guidelines to promote e-mobility. In the future, electric or hybrid vehicles will be made available as company cars, depending on the delivery situation. At the end of the 2022 reporting year, the proportion of electric or hybrid vehicles in the fleet was hybrid vehicles in the fleet was around 43%. In addition to individual company cars, there are currently eight pool company cars at the sites, which will also be converted to electric or hybrid drives when the leases expire.

Further emissions are caused by our employees' commute to work. flatexDEGIRO promotes the use of public transport and bicycles. For example, in 2018 every employee was given a bicycle, and all locations were equipped with a bicycle pool that all employees can use. The switch to e-mobility was also promoted in the private sector by encouraging our landlords to install charging infrastructure at suitable locations. In addition to an existing charging infrastructure at our Frankfurt site, the installation of 20 charging points at our Neuss site was completed in February 2023. Evaluation is currently underway for our other sites. Through various measures that promote mobile working by our employees, the generation of emissions from commuting to work is avoided altogether.

flatexDEGIRO aims to reduce Scope 1 and Scope 2 emissions by at least 70% by 2026. Scope 3 emissions are considered on a situational basis (e.g. commuter traffic) and are to be reduced by up to 30% on an event-driven basis.

Reporting according to Article 8 of the EU Taxonomy Regulation

Within the framework of the EU Action Plan on Sustainable Finance, the redirection of capital flows towards sustainable investments is a key objective. Against this background, Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020, establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (hereinafter referred to as the Taxonomy Regulation) entered into force. As a uniform and legally binding classification system, it defines which economic activities are considered "environmentally sustainable" in the EU. The results of this classification are to be reported annually on a company-specific basis.

Article 9 of the Taxonomy Regulation identifies the following six environmental objectives:

1. Climate protection
2. Adaptation to climate change
3. the sustainable use and protection of water and marine resources
4. the transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

The EU has currently published targets on sustainable economic activities as defined by the EU taxonomy for two environmental targets (climate change mitigation and adaptation) (so-called delegated climate act, delegated regulation (EU) 2021/2139) and the inclusion of the four additional EU environmental targets in the reporting requirements is expected in the future.

With regard to the classification of an economic activity as "environmentally sustainable" within the meaning of the EU taxonomy, a distinction must be made between taxonomy eligibility and taxonomy conformity. In the first step, it has to be checked whether an economic activity is within the regulatory scope of the EU taxonomy and thus taxonomy-eligible. Only taxonomy-eligible economic activities can be considered "environmentally sustainable" and thus taxonomy-compliant if certain criteria are met. Accordingly, the second step is to evaluate whether the economic activity makes a significant contribution to an environmental objective, does not significantly compromise another environmental objective, and ensures compliance with the minimum protection requirements. For compliance with the minimum protection, Article 18 of the Taxonomy Regulation specifies that the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the fundamental principles and rights from the eight core conventions set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work (ILO Core Labor Standards), and from the International Bill of Human Rights are to be followed.

With the obligation to disclose a non-financial statement, the flatexDEGIRO Group is required to apply the regulatory requirements of the Taxonomy Regulation. Pursuant to Section 315e (1) i. in conjunction with Section 290 (1) of the German Commercial Code (HGB), the consolidated financial statements of the flatexDEGIRO Group as of December 31, 2022 have been prepared in accordance with IFRS.

According to question 4 of the EU Taxonomy FAQs of 20.12.2021, consolidated non-financial reporting is based on the classification of the parent company as a financial company (asset manager, investment firms, credit institution or insurance company) or as a non-financial company. Which KPIs have to be reported

according to Art. 8 of the taxonomy is therefore based on the classification of the (parent) company that is obliged to prepare the non-financial (group) reporting. The high standard of the technical assessment criteria requires a longer transformation and leads to a different interpretation of the FAQs in the reporting year 2022. In interpretation of the FAQs, a classification of flatexDEGIRO AG, as a reporting company, as a non-financial company is made. This decision is justified not least by a significant increase in adjusted EBITDA in the Group's TECH (Technologies) operating segment, while adjusted EBITDA in the FIN (Financial Services) operating segment almost halved. We intend to continuously increase the taxonomy compliance of our economic activities and to include voluntary reporting of additional industry-specific KPIs for material subsidiaries for fiscal year 2023.

For fiscal year 2022, disclose the shares of taxonomy-eligible and non-taxonomy-eligible and taxonomy-compliant and non-taxonomy-compliant economic activities in sales and capital expenditures (CapEx) and operating expenditures (OpEx).

On December 19, 2022, the European Commission published the "Draft Commission Notice" on the interpretation and implementation of the Delegated Acts of EU Taxonomy (FAQs), which has not yet been published in the Official Journal of the European Union. The interpretations do not lead to a different assessment with regard to the calculated key figures.

Economic activities relevant to sales

Based on the descriptions of the economic activities in the Delegated Climate Acts of the Taxonomy Regulation, the activities of the flatexDEGIRO Group were analyzed as to whether and to what extent the economic activities are taxonomy-eligible with respect to the environmental objectives of climate change mitigation and adaptation. The taxonomy-eligible economic activity "8.1. data processing, hosting and related activities" includes "storage, manipulation, management, movement, control, display, switching, exchange, transmission or processing of data through data centers, including edge computing". Within our business activities, activities in this industry are provided in the operating tech segment. Since flatexDEGIRO AG does not manage its own data center space, the partial spaces of external providers ("operated on colocations") were included in the evaluation. In order to make a significant contribution to climate protection in accordance with EU taxonomy, data centers must comply with the EU Code of Conduct for Data Center Energy Efficiency. As we have not yet had compliance with the code externally audited as required by the EU taxonomy, we classify the data centers used for economic activity 8.1 as not taxonomy-compliant in the reporting year.

Cross-cutting activities

flatexDEGIRO has a vehicle fleet that includes both company cars and pool vehicles. Thus, the economic activity Transport by motorcycles, passenger cars and light commercial vehicles (6.5) is relevant as a cross-sectional activity covering the acquisition, leasing and operation of vehicles in classes M1 and N1 (passenger cars and light commercial vehicles with a maximum total weight of 3.5 t). As we are driving forward the (partial) electrification of our fleet, the majority of new vehicles procured already meet the CO₂ limits set by the EU taxonomy. These vehicles have also been shown to comply with the main other requirements of the EU taxonomy, which relate to applicable EU legislation for new vehicles. As vehicle users are free to choose their vehicle tires, taxonomy conformity of the tires could not be demonstrated for the reporting year. Therefore, we report the capital expenditures associated with our vehicle fleet as not taxonomy compliant.

The real estate-related investments in the reporting year mainly relate to the economic activity "7.7 Acquisition and ownership of buildings" and refer to real estate-related leases of the flatexDEGIRO Group.

In accordance with Annexes 1 and 2 of the Taxonomy Regulation, taxonomy compliance can be verified, among other things, through the disclosure of the energy class, which must correspond to class A or better for compliance. As a qualification of the criteria for the material contribution and specific DNSH criteria, for the properties in our leasing assets, has not yet been completed, we classify the capital expenditures resulting from the cross-cutting activity 7.7 as not taxonomy-compliant.

Calculation of the taxonomy KPIs

The total values of the Group underlying the calculation according to the EU taxonomy for the reporting year 2022 amounted to EUR 407.0 million in turnover, EUR 59.6 million in capital expenditures and EUR 15.8 million in operating expenses.

In this context, turnover in accordance with the EU taxonomy correspond to the turnover in the consolidated statement of income in the consolidated financial statements. The relevant capital expenditures were determined on the basis of the consolidated statement of financial position in the consolidated financial statements and result from the sum of additions to and changes in the scope of consolidation of property, plant and equipment, intangible assets (excluding goodwill) and rights of use. In accordance with the rules of the EU taxonomy, the disclosures on capital expenditures are not part of a capital expenditure plan. The EU taxonomy defines relevant operating expenses as expenses for research and development, building refurbishment measures, short-term leasing, maintenance and repair, and other direct expenses in connection with the day-to-day maintenance of property, plant and equipment.

The data on revenue, capital expenditure and operating expenses shown below as taxonomy-compliant or -compliant are directly allocated to the operation of data centers in accordance with economic activity 8.1. We did not generate any revenue from the cross-divisional activities. Only capital expenditure was attributed to economic activities 6.5 and 7.7.

Double counting within the meaning of the EU taxonomy is avoided, as taxonomy-eligible turnover can only be allocated to one economic activity. In addition, investment and operating expenses were only allocated to the cross-cutting activities 6.5 and 7.7 if a direct connection of the financed measures with the revenue-relevant economic activity 8.1 was excluded.

As the EU taxonomy has not yet adequately covered our core business, an aggregated view of the taxonomy eligibility of all economic activities for 2022 also results in only a small taxonomy-eligible share of turnover (0.1%), capital expenditures (39.2%) and operating expenses (5.6%) for the Group. We have no activities under Delegated Regulation 2022/1214 relating to nuclear energy and fossil gas.

Key figures for EU taxonomy | Turnover

Codes	Absolute turnover (MEUR)	Proportion of turnover (%)	Substantial contribution criteria							DNSH criteria (Do No Significant Harm)					Minimum social protection (Y/N)	Taxonomy-aligned proportion of turnover, year N (%)	Taxonomy-aligned proportion of turnover, year N-1 (%)	„Enabling activities“ category (E)	„Transition activities“ category (T)
			Climate change mitigation (%)	Climate change adaptation (%)	Water and marine resources (%)	Circular economy (%)	Pollution (%)	Biodiversity and ecosystems (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and Ecosystems (Y/N)					
Economic activities																			
A. ELIGIBLE ACTIVITIES																			
A.1 Eligible Taxonomy-aligned activities																			
-	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-	-	-	-	
Turnover of eligible Taxonomy-aligned activities (A.1)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-	-	-	-	
A.2 Eligible not Taxonomy-aligned activities																			
Data processing and hosting	8.1	0.3	0.1																
Transportation by motorcycles, passenger cars and light commercial vehicles	6.5	0.0	0.0																
Acquisition and ownership of buildings	7.7	0.0	0.0																
Turnover of eligible not Taxonomy-aligned activities (A.2)	0.3	0.1																	
Total (A.1. + A.2)	0.3	0.1																	
B. NON-ELIGIBLE ACTIVITIES																			
Turnover of non-eligible activities	406.7	99.9																	
Total (A+B)	407.0	100.0																	



Key figures for EU taxonomy | CapEx

Codes	Absolute CapEx (MEUR)	Proportion of CapEx (%)	Substantial contribution criteria						DNSH criteria (Do No Significant Harm)						Minimum social protection (Y/N)	Taxonomy-aligned proportion of CapEx, year N (%)	Taxonomy-aligned proportion of CapEx, year N-1 (%)	„Enabling activities“ category (E)	„Transition activities“ category (T)
			Climate change mitigation (%)	Climate change adaptation (%)	Water and marine resources (%)	Circular economy (%)	Pollution (%)	Biodiversity and ecosystems (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and Ecosystems (Y/N)					
Economic activities																			
A. ELIGIBLE ACTIVITIES																			
A.1 Eligible Taxonomy-aligned activities																			
-	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-	-	-	-	
CapEx of eligible Taxonomy-aligned activities (A.1)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-	-	-	-	
A.2 Eligible not Taxonomy-aligned activities																			
Data processing and hosting	8.1	8.1	13.6																
Transportation by motorcycles, passenger cars and light commercial vehicles	6.5	0.6	1.0																
Acquisition and ownership of buildings	7.7	14.7	24.6																
CapEx of eligible not Taxonomy-aligned activities (A.2)	23.4	39.2																	
Total (A.1. + A.2)	23.4	39.2																	
B. NON-ELIGIBLE ACTIVITIES																			
CapEx of non-eligible activities	36.3	60.8																	
Total (A+B)	59.6	100.0																	



Key figures for EU taxonomy | OpEx

Codes	Absolute OpEx (MEUR)	Proportion of OpEx (%)	Substantial contribution criteria						DNSH criteria (Do No Significant Harm)						Minimum social protection (Y/N)	Taxonomy-aligned proportion of OpEx, year N (%)	Taxonomy-aligned proportion of OpEx, year N-1 (%)	„Enabling activities“ category (E)	„Transition activities“ category (T)
			Climate change mitigation (%)	Climate change adaptation (%)	Water and marine resources (%)	Circular economy (%)	Pollution (%)	Biodiversity and ecosystems (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and Ecosystems (Y/N)					
Economic activities																			
A. ELIGIBLE ACTIVITIES																			
A.1 Eligible Taxonomy-aligned activities																			
-	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-	-	-	-	
OpEx of eligible Taxonomy-aligned activities (A.1)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-	-	-	-	
A.2 Eligible not Taxonomy-aligned activities																			
Data processing and hosting	8.1	0.9	5.6																
Transportation by motorcycles, passenger cars and light commercial vehicles	6.5	0.0	0.0																
Acquisition and ownership of buildings	7.7	0.0	0.0																
OpEx of eligible not Taxonomy-aligned activities (A.2)	0.9	5.6																	
Total (A.1. + A.2)	0.9	5.6																	
B. NON-ELIGIBLE ACTIVITIES																			
OpEx of non-eligible activities	14.9	94.4																	
Total (A+B)	15.8	100.0																	



Social Responsibility

Social Responsibility

Capital market access and education

The business model helps to promote the participation of society as a whole in international capital markets. Long-term, high-yield investments on the capital market in the form of equities, funds and ETFs play a key role in wealth creation, and not only in times of low interest rates. Participation in the performance of international financial markets should be possible for as large a group of people as possible, also to supplement state pension provision.

Only an easy access to the financial market and a reasonable transaction cost make capital investment accessible and attractive even for small investors with lower investment capital. Our platforms meet these requirements. Please refer to the explanations in the section "Innovative products and services".

An extensive information and training offering on basic economic and financial knowledge, introductions to the flatexDEGIRO online platforms and product training help flatexDEGIRO customers to make considered and informed decisions. Videos, interactive formats and topic-based events are designed to offer a broad selection of information sources. With "The Art of Investing," flatexDEGIRO has had a TV documentary broadcast on several TV channels and online in Europe in January 2022 that teaches important basics for private investors. In four episodes, renowned journalists, professors, behavioral scientists and investors challenge some of the biggest misconceptions about investing by analyzing historical events and the mechanisms at work.

In the quest to make investing accessible to everyone who wants to shape their own financial future, DEGIRO partnered with **LINDA. in** 2022. LINDA. is the largest content platform for women in the Netherlands. To educate women more about investing, LINDA. and DEGIRO created a series of blog articles, educational videos and podcasts, and organized a so-called "masterclass seminar" for women. The educational content was seen by millions of Dutch women, and the workshop sold out in less than two days. DEGIRO also cooperates with other partners, such as **The Next Women** and **Dutchess Capital**, to offer seminars for women on chapter investing.

In the coming years, flatexDEGIRO will continue to pursue the goal of making investment and private retirement planning easier and more accessible for retail investors. The planned further development and launch of mobile applications in additional countries will contribute to this. This is intended to specifically serve the long-term asset accumulation and retirement provision of a broad section of the population.

GRI Content Index

Global Reporting Initiative (GRI)

For the fiscal year 2022, flatexDEGIRO reports on its sustainability performance in accordance with the standards published by the GRI. The information contained in the report was selected on the basis of a materiality analysis carried out in 2020 and relates to information from the 2022 Non-Financial Report (NFB), the 2022 Annual Report (AR) and the website of flatexDEGIRO AG (www.flatexdegiro.com).

This report also serves as our annual Communication on Progress on the implementation of the ten principles of the UN Global Compact (UNGC).

The following table assigns the relevant standards to the main topics:

Essential topics	GRI Standard
Corporate Governance and Compliance	
Compliance and business ethics	GRI 201: Economic performance 2016
	GRI 205: Anti-corruption 2016
	GRI 206: Anti-competitive behavior 2016
	GRI 207: Taxes 2019
	GRI 406: Non-discrimination 2016
	GRI 308: Environmental assessment of suppliers 2016
	GRI 414: Social assessment of suppliers 2016
Customers and products	
Innovative products and services	Management approach: NFB, page 30-31
Customer orientation	GRI 417: Marketing and labeling 2016
Data protection and security	GRI 418: Protection of customer data 2016
Promotion of sustainable investments	Management approach: NFB, Page 31
Environment	
Energy and emissions	GRI 302: Energy 2016
	GRI 305: Emissions 2016
Employees	
Employee satisfaction	GRI 401: Employment 2016
	GRI 402: Employee-employer relationship 2016
	GRI 405: Diversity and equal opportunities 2016
Health protection	GRI 403: Occupational health and safety 2018
Education and training	GRI 404: Education and training 2016
Social responsibility	
Capital market access and education	Management approach: NFB, page 54

GRI content index

The page references are to the Non-Financial Report (NFR), the Annual Report (AR) and the Corporate Governance Statement (CSR).

Statement on the use of the GRI Standards:
flatexDEGIRO AG has reported the information mentioned in this GRI Content Index for the period January 1, 2022 to December 31, 2022 in accordance with the GRI Standards.

GRI 1: Basics 2021

GRI 2: General disclosures

Details		Page	Comment and external references	UNGC
Organizational profile and reporting procedures				
GRI 2-1	Organisational profile	AR, pages 39–40; AR, page 46		
GRI 2-2	Entities included in the organization's sustainability reporting	NFR, page 12; AR, pages 105–106		
GRI 2-3	Reporting period, report cycle, and points of contact	NFR, page 12	The report is published annually. Contact is our Sustainability Officer Thomas Windisch, thomas.windisch@flatexdegiro.com	
GRI 2-4	Restatements of information		There have been no adjustments compared with the previous year's report.	
GRI 2-5	External assurance	NFR, page 12	No external audit	
Activities and employees				
GRI 2-6	Activities, value chain and other business relationships	AR, pages 39–40; AR, pages 44–45; AR, pages 46–50; AR, pages 105–106		
GRI 2-7	Employees	AR, page 46; NFR, pages 33–35; NFR, pages 40–42;		6
GRI 2-8	Workers who are not employees	NFR, page 35		6
Company management				
GRI 2-9	Governance structure and composition	AR, pages 23–35; AR, pages 90–91; AR, page 156; CSR, pages 7–14		
GRI 2-10	Nomination and selection of the highest governance body	CSR, page 10; CSR, pages 12–13	Declaration of Compliance with the Corporate Governance Code	



Details		Page	Comment and external references	UNGC
GRI 2-11	Chair of the highest governance body	CSR, page 8		
GRI 2-12	Role of the highest governance body in overseeing the management of impacts	AR, pages 77–79		
GRI 2-13	Delegation of responsibility for managing impacts	NFR, pages 12–15;		
GRI 2-14	Role of the highest governance body in sustainability reporting	NFR, page 12; NFR, pages 15–17; CSR, page 12; CSR, page 19		
GRI 2-15	Conflicts of interest	CSR, pages 6-7; AR, page 33		10
GRI 2-16	Communication of critical concerns	CSR, pages 11-14		
GRI 2-17	Collective knowledge of the highest governance body	AR, pages 22–35		
GRI 2-18	Evaluation of the performance of the highest governance body	AR, pages 22–35		
GRI 2-19	Remuneration policies	AR, pages 42– 44 AR, page 70 AR, pages 112–113; AR, page 120	Declaration of Compliance with the Corporate Governance Code	
GRI 2-20	Process to determine remuneration		Compensation system for members of the Supervisory Board Compensation system for the members of the Board of Management	
Strategy, policies and practice				
GRI 2-22	Statement by the most senior decision-maker	NFR, pages 3–4		
GRI 2-23	Policy commitments	NFR, page 21		10
GRI 2-24	Embedding policy commitments	NFR, page 21		10
GRI 2-25	Processes to remediate negative impacts	NFR, pages 12–15;		
GRI 2-26	Mechanisms for seeking advice and raising concerns	NFR, page 21		10
GRI 2-27	Compliance with laws and regulations		There were no violations of the law in the reporting year.	
GRI 2-28	Membership associations and interest groups		Industry associations and regulatory authorities	
Stakeholder involvement				
GRI 2-29	Approach to stakeholder engagement	NFR, pages 12–15; NFR, pages 28–30		
GRI 2-30	Collective bargaining agreements		At flatexDEGIRO, all employees are paid in line with the market. Collective bargaining agreements do not apply.	3

GRI 3: ESSENTIAL TOPICS

Details		Page	Comment and external references	UNGC
GRI 3-1	Process to determine material topics	NFR, pages 14–17		
GRI 3-2	List of material topics	NFR, pages 14–17		

Details		Page	Comment and external references	UNGC
GRI 201	Economic performance 2016			
GRI 3-3	Management approach	AR, pages 19–21; AR, pages 107–113		
GRI 201-1	Direct economic value generated and distributed	AR, pages 94–99		
GRI 201-2	Financial implications and other risks and opportunities due to climate change	AR, pages 107; NFR, pages 47–50		7
GRI 201-3	Defined benefit plan obligations and other retirement plans	AR, pages 158–162		
GRI 201-4	Financial assistance received from government		We did not receive any financial support from the public sector in the year under review.	
GRI 205	Anti-corruption 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 16; NFR, pages 22–23		
GRI 205-1	Operations assessed for risks related to corruption	NFR, pages 22–23		
GRI 205-2	Communication and training about anti-corruption policies and procedures	NFR, page 24		10
GRI 205-3	Confirmed incidents of corruption and actions taken	NFR, page 24		10
GRI 206	Anti-competitive behaviour 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 16; NFR, pages 22–23		
GRI 206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	NFR, page 23		
GRI 207	Tax 2019			
GRI 3-3	Management approach	NFR, pages 24–26		
GRI 207-1	Approach to tax	NFR, pages 24–26		
GRI 207-2	Tax governance, control, and risk management	NFR, page 23; NFR, pages 24–26		
GRI 207-3	Stakeholder engagement and management of concerns related to tax	NFR, pages 12–15; NFR, pages 24–26		
GRI 207-4	Country-by-country reporting	NFR, pages 24–26		



GRI 302		Energy 2016	
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 20; NFR, page 44	
GRI 302-1	Energy consumption within the organization	NFR, pages 44–45	7, 8
GRI 305		Emissions 2016	
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 20; NFR, page 44	
GRI 305-1	Direct (scope 1) GHG emissions	NFR, pages 46–48;	7, 8
GRI 305-2	Energy indirect (scope 2) GHG emissions	NFR, pages 46–48;	7, 8
GRI 305-3	Other indirect (scope 3) GHG emissions	NFR, pages 46–48;	7, 8
GRI 308		Supplier environmental assessment 2016	
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 16; NFR, pages 21–22	
GRI 308-1	New suppliers that were screened using environmental criteria	NFR, pages 3–4; NFR, pages 21–22	8
GRI 401		Employment 2016	
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 18; NFR, page 33	
GRI 401-1	New employee hires and employee turnover	NFR, page 40; NFR, pages 39–43	6
GRI 401-3	Parental leave	NFR, pages 39–40	6
GRI 402		Labour/management relations 2016	
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 33	
GRI 402-1	Minimum notice periods regarding operational changes		flatexDEGIRO informs all employees about upcoming operational changes as early and comprehensively as possible.
GRI 403		Occupational health and safety 2018	
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 18; NFR, page 33; NFR, pages 38–40	
GRI 403-1	Occupational health and safety management system	NFR, pages 38–40	
GRI 403-2	Hazard identification, risk assessment, and incident investigation	NFR, pages 38–40	
GRI 403-3	Occupational health services	NFR, pages 38–40	
GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	NFR, pages 38–40	
GRI 403-5	Worker training on occupational health and safety	NFR, pages 38–40	
GRI 403-6	Promotion of worker health	NFR, pages 38–40	
GRI 403-9	Work-related injuries	NFR, pages 38–40	
GRI 404		Training and further education 2016	
GRI 3-3	Management approach	NFR, pages 12–15;	

		NFR, page 18; NFR, page 35		
GRI 404-2	Programs for upgrading employee skills and transition assistance programs	NFR, page 35-38		
GRI 404-3	Percentage of employees receiving regular performance and career development reviews	NFR, page 40		
GRI 405	Diversity and equal opportunity 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 18; NFR, pages 40-42; CSR, pages 15–18		
GRI 405-1	Diversity of governance bodies and employees	CSR, pages 15–18		6
GRI 406	Non-discrimination 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 18; NFR, pages 21–22		
GRI 406-1	Incidents of discrimination and corrective actions taken	NFR, pages 22–23		6
GRI 412	Human rights assessment 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 16; NFR, pages 21–22		
GRI 412-2	Employee training on human rights policies or procedures	NFR, pages 22–24	The topic of human rights is included in the training courses on the Code of Conduct.	2
GRI 414	Supplier social assessment 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 16; NFR, pages 21–22		
GRI 414-1	New suppliers that were screened using social criteria	NFR, pages 3–4; NFR, pages 21–22		4, 5
GRI 417	Marketing and labelling 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 18; NFR, pages 28–30		
GRI 417-1	Requirements for product and service information and labelling	NFR, pages 28–30		
GRI 417-2	Incidents of non-compliance concerning product and service information and labelling		No violations came to light in the year under review.	
GRI 417-3	Incidents of non-compliance concerning marketing and communications		No violations came to light in the year under review.	
GRI 418	Customer data protection 2016			
GRI 3-3	Management approach	NFR, pages 12–15; NFR, page 18; NFR, pages 27–28		
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data		There were no justified complaints in the year under review.	

2022

Non-financial report

Imprint

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