

Warsaw, March 31, 2026

OPINION OF THE SUPERVISORY BOARD OF XTB S.A.
regarding the draft resolutions of the Ordinary General Meeting,
which is scheduled to be convened in May 2026.

The Supervisory Board of XTB S.A. (hereinafter: the Company) has reviewed the draft resolutions for the Ordinary General Meeting, scheduled to be convened in May 2026, as presented by the Company's Management Board. The Supervisory Board presents its opinions below regarding the adoption of individual resolutions, noting that the Supervisory Board did not issue opinions on resolutions of an organizational or procedural nature, i.e., resolutions regarding the election of the Chairman of the General Meeting and the adoption of the agenda:

- a) with regard to the resolution on the approval of the Management Board's Report on the activities of the XTB Capital Group and XTB S.A. for the financial year 2025, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- b) with regard to the resolution on the approval of the separate financial statements of XTB S.A. for the financial year 2025, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- c) with regard to the resolution on the approval of the consolidated financial statements of XTB Capital Group for the financial year 2025, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- d) with regard to the resolution on the distribution of profit, determination of the dividend record date, and the dividend payment date, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- e) with regard to the resolution on granting discharge to the President of the Company's Management Board, Mr. Omar Arnaout, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- f) with regard to the resolution on granting discharge to Mr. Paweł Szejko, a Member of the Company's Management Board, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- g) with regard to the resolution on granting discharge to Mr. Filip Kaczmarzyk, a Member of the Company's Management Board, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;

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- h) with regard to the resolution on granting discharge to Mr. Jakub Kubacki, a Member of the Company's Management Board, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- i) with regard to the resolution on granting discharge to Mr. Andrzej Przybylski, a Member of the Company's Management Board, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- j) with regard to the resolution on granting discharge to Mr. Bartosz Osiński, a Member of the Company's Management Board, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- k) with regard to the resolution on authorising the Management Board to acquire treasury shares and on the establishment of a reserve capital for the acquisition of the Company's treasury shares, the Supervisory Board issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- l) with regard to the resolution on establishing a new incentive programme for the Company's top employees, its branches and subsidiaries, it issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;
- m) with respect to the resolution on amending the Policy of Granting Fixed Remuneration to Members of the Management Board and Members of the Supervisory Board and the Policy of Granting Variable Remuneration, as well as repealing the Rules of the Incentive Scheme for persons having a material impact on the risk profile of XTB, subject to the following, has issued a **positive** opinion on the adoption of the resolution in question by the Company's Ordinary General Meeting;

The Supervisory Board **abstains** from issuing an opinion on resolutions concerning:

- a) review and approval of the Report on the Activities of the Company's Supervisory Board for 2025;
- b) granting discharge to individual members of the Supervisory Board for the performance of their duties in the financial year 2025;
- c) expressing an opinion on the Remuneration Report for the financial year 2025;
- d) amendments to the Policy of Granting Fixed Remuneration to Members of the Management Board and Members of the Supervisory Board, to the extent that the draft resolution concerns the fixed remuneration of Supervisory Board members,

given that these resolutions directly concern individual members of the Supervisory Board or the activities of the Supervisory Board as a body of the Company.

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