

Politica retributiva di SGSS S.p.A.

SGSS S.p.A. ha elaborato, in ottemperanza alle disposizioni di Banca d'Italia, un proprio documento unitario sulla politica retributiva; la versione oggi in vigore è quella approvata dall'Assemblea degli azionisti in data 17 Aprile 2025.

Esso consta di due sezioni: la prima delle quali, elaborata da Société Générale SA, è il documento sulle politiche di remunerazione del Gruppo Société Générale; la seconda è rappresentata dall'allegato specifico per SGSS S.p.A. denominato "*Italian Annex*", che declina ed integra a livello locale i principi sanciti contenuti nel documento sulle politiche di remunerazione del Gruppo Société Générale.

Il documento sulle politiche di remunerazione del Gruppo Société Générale, denominato "Société Générale – 2024 Compensation Policies and Practices Report", è disponibile sul sito dell'Impresa madre:

[Société Générale - 2024 Compensation Policies and Practices Report.](#)

Il testo dell'"Italian Annex" è, invece, riportato di seguito.

Société Générale – 2025 Remuneration Policies and Practices Report

Italian Annex

Entities in scope:

Société Générale Securities Services S.p.A. (SGSS S.p.A.).

SGSS S.p.A. is an unlisted Italian bank fully controlled by Société Générale S.A.

Introduction

As provided for by Part 1, Title IV, Chapter 2 of Bank of Italy's Circular n. 285/2013 and following amendments (hereinafter, the New Provisions):

- *“Italian banks that are subsidiaries of a parent company based in a different country of the European Union, if included within the scope of the remuneration policies and practices defined by the foreign parent company, may avoid preparing their own document on remuneration policies if the one prepared by the foreign parent company duly accounts for the specifics of the Italian bank or group from an operational viewpoint, and ensures compliance with the present provisions. This exemption shall not apply to listed companies”* (Section I, paragraph 8 of the New Provisions);
- *“Considering that unlisted banks that are not part of groups, even if subsidiaries of a parent company based in another state of the European Union, are not required to write their own document on remuneration policies pursuant to Section I, paragraph 8, they shall submit the document prepared by the Parent Company to the General Meeting for approval as far as point i and ii are concerned. Ex-post reporting may be submitted to the General Meeting in the form of the report prepared by the Parent Company as far as point i and ii are concerned. As far as point iii is concerned, the bank prepares an own document through which it provides the General Meeting with separate ex ante and ex post reporting.”* (Section II, paragraph 1 of the New Provision);
- *“The banks establish the remuneration committee in accordance with Chapter 1, Section IV, paragraph 2.3.1. In addition, in order to grant that incentives underlying the remuneration system are consistent with the management by the bank of its profiles of risk, capital and liquidity, the remuneration committee, if established, can be supported by experts, even external, in such fields (6). (Footnote n. 6: It is advisable that the Risk Manager takes part in the meetings of the remuneration committee especially to ensure that the incentive systems are adequately gauged to account for all the risks taken by the bank, in accordance with methods that comply with the ones adopted by the bank for purposes of risk management)”* (Section II, paragraph 2 of the New Provisions);
- *“Unlisted Italian subsidiaries of a parent company based in Italy or in another country of the EU may avoid establishing a committee if it exists at the parent company; the parent company based in another country of the EU duly takes into account the specifics of the Italian bank from an operational point of view and ensures compliance with the present provisions. Where they exist, the functions of the committees are performed in accordance with the criteria established by the corresponding committees of the parent company and in liaison with them.”* (Footnote n. 13 of Title IV, Chapter 1, Section IV of the New Provision).

The New Provisions takes into account the internationally agreed guidelines and criteria, including those developed by the EBA and by the FSB; the Annual Compensation Review (ACR) exercise concerning the period 2025 - 2026 is governed by the New Provisions.

On June 9, 2021, the Commission Delegated Regulation (EU) No 923/2021 of 25 March 2021 supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to regulatory technical standards with respect to qualitative and appropriate quantitative criteria to identify categories of staff whose professional activities have a material impact on an institution's risk profile (hereinafter, the Regulation) was published on the Official Journal of the European Union.

As far as the identification of the regulated population is concerned, the New Provisions makes essential reference to the Regulation.

For the proper application of the New Provisions, it is important to consider that:

- SGSS S.p.A. is listed in the list of significant credit institutions issued by ECB. As such, SGSS S.p.A. is subject to all the provisions contained in the New Provisions;
- the New Provisions are not in conflict with the Commission Delegated Regulation (EU) No 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive.¹

SGSS S.p.A. belongs to the Société Générale Group and as such is covered by the Group's remuneration policy as described in the document "2024 Remuneration Policies and Practices Report" (hereafter "The Document"). The purpose of the present Italian Annex (hereinafter, the Annex) to the Document is to detail how Société Générale Group Policy, as described in the Document, takes into account the specifics of SGSS S.p.A. from an operational point of view and ensures compliance with the New Provisions.

For the aforementioned purpose, the content of the Document is to be read in conjunction with the specifications contained in the present Annex.

Part 1. Corporate governance of remuneration policy

1.1. Implementation of CRDV Compensation Requirements, the role of the Group Compensation Committee and the role of the Board of Directors, the Remuneration Committee and the Shareholders' Meeting from SGSS S.p.A.

As detailed in the Document, the Group Compensation Committee reviews annually the remuneration policy applicable within the SG Group and in particular the remuneration policy and the identification of regulated employees (hereinafter also defined "regulated population") at the SG Group level.

As such, Société Générale S.A. developed a Group's guidelines for the identification of regulated employees and determines annually the variable remuneration policy applicable for such employees.

SGSS S.p.A.'s document on remuneration policy is represented by the Document and the present Annex, and any subsequent amendment of both the Document and the present Annex, as approved by SGSS S.p.A. Board of Directors and SGSS S.p.A. Shareholders' Meeting. Processing and approval procedure of Remuneration Policy at SGSS S.p.A. are duly described in SGSS S.p.A.'s Annual Compensation Review (ACR) process.

SGSS S.p.A.'s Board of Directors is responsible for the proper identification of the locally regulated employees (hereinafter also defined "locally regulated population") within SGSS S.p.A. and for ensuring that the remuneration policy applicable to such employees is compliant with the New Provisions.

In applying the best practice suggested by the Group's Human Resources Department, though not mandatory under the New Provisions, on December 14, 2016, SGSS S.p.A.'s Board of Directors has established a Remuneration Committee that it is aimed to help SGSS S.p.A.'s Board of Directors in performing its duties with reference to the proper application of the remuneration policy.

¹ SGSS S.p.A. provides its customers (institutional investors that can be classified exclusively as "professional investors" or "eligible counterparties") with the investment service of reception and transmission of orders (limitedly to orders concerning parts of Undertakings for Collective Investments – UCI) an ancillary service to the main services of depositary bank and custodian bank, exclusively upon request of its customers and without any solicitation/advise. The remuneration of employees involved in providing such investment services is not linked at all to their economic results

The SGSS S.p.A.'s Remuneration Committee has, among other duties, to take care of:

- i. reviewing the proposed compensation budgets and distribution strategy;
- ii. reviewing the identification of locally regulated population and the compensation policy for this population;
- iii. as part of the periodic review referred to in Section II, par. 2, of the New Provisions, supporting the body with strategic supervision function (SGSS S.p.A.'s Board of Directors) **in the analysis of the neutrality** of the remuneration policies with respect to gender.

The SGSS S.p.A.'s Remuneration Committee consists of n. 3 members, including n. 2 independent director.

SGSS S.p.A.'s Board of Directors ensures that the remuneration policy is duly documented and is accessible within the company organization.

Ex-post reporting on the application of the Remuneration Policy is performed by SGSS S.p.A. in accordance with Section VI, paragraph 3, of the New Provisions, by providing, at least annually, its Shareholders' Meeting with at least the same information made publicly available in accordance with Section VI, paragraph 1, of the New Provisions.

1.2. The role of internal control functions at SGSS S.p.A.

The U.O. Human Resources ensures preventive reporting on all and each of the different steps of the Annual Compensation Review process at SGSS S.p.A. to the U.O. Compliance and the U.O. Global Risk Management, providing them all the necessary information and documents, for the purpose of enabling each of them to carry out the relevant controls and, therefore, ensure the proper application of the New Provisions. The U.O. Accounting and Balance Sheet is involved in the relevant activities in accordance with the Document.

The internal audit function (outsourced to Société Générale S.A. – IGAD Division) performs the controls indicated in the New Provisions with due procedures and timing. The conclusions of this internal control will be communicated to the Board of Directors and the Board of Statutory Auditors in order to implement the required corrective measures, who shall evaluate their relevance in terms of duly advising the Bank of Italy. The outcome of the controls performed is made known annually to the Shareholders' Meeting.

Part 2. Remuneration policies and principles applicable to SGSS S.p.A.

2.1 Compensation of the Governance bodies and internal control functions

At SGSS S.p.A., the members of the Board of Directors, with the exception of the Independent Directors, do not receive any compensation, consistently with the provisions of the Société Générale Group (hereinafter, the SG Group), in their position as Italian or foreign employees of the SG Group.

The remuneration of the above-mentioned Independent Directors is set in accordance with market practice and must be authorized by Société Générale S.A.; in any case, no incentive mechanism is applied.

The members of the Board of Statutory Auditors are compensated on the basis of Professional Rates. In any case, no incentive mechanism is applied.

If any, the individual agreement in place with each of the Independent Directors and each of the members of the Board of Statutory Auditors must be in compliance with the New Provisions.

The structure of remuneration for staff of U.O. Compliance and U.O. Global Risk Management must comply with the specific rules of Part 1 – Chapter 2 of the Document and Section III, paragraph 3, of the New Provisions.

2.2 Perimeter of the regulated population

2.2.1. Identification of the locally regulated population

The identification of the locally regulated population is to be annually performed in compliance with the New Provisions and the Regulation and the relevant list has to be submitted to the Group's Human Resources Department for validation. The scope of the 2025 regulated population covers all employees whose professional activities have a material impact on the Bank's risk profile, including employees exercising control functions. As a result, have been identified 14 subjects within SGSS SpA (1 more compared with previous year) plus 6 members within the Board of Directors. No request for exclusion has been formalized for the current exercise. Following the list within SGSS S.p.A. of locally regulated population:

- GM;
- DGM Corporate;
- Head of Global Risk Management
- Head of Technology & Transformation;
- Head of Fund Service Operation;
- Head of Compliance;
- Anti Money Laundering Officer (AMLO)
- Head of Finance;
- Head of Coverage, Marketing & Solutions;
- Head of Human Resources;
- Head of Legal Affairs;
- Head of Tax;
- Chief Information Security Officer (CISO);
- Head of Securities Banking Operations

The Head of U.O. Human Resources, in coordination with the Group's Human Resources Department and with the assistance of the Head of U.O. Global Risk Management and the Head of U.O. Compliance, shall perform an accurate self-assessment to identify the regulated population at SGSS S.p.A. This process must be based on the recognition and evaluation of individual positions (responsibility, hierarchical levels, activities performed, operational proxies, etc.), essential elements for an evaluation of the relevance of each subject in terms of the taking of risks by SGSS S.p.A.

The identification process has been performed in line with the "New Provisions" rules.

The self-assessment process and its outcome must be duly justified and formalised. The outcome has to be submitted by the Head of U.O. Human Resources to the Group's Human Resources Department and to the Remuneration Committee before the same is submitted to SGSS S.p.A.'s Board of Directors.

2.2.2. Application of “principle of proportionality”

In application of the “principle of proportionality”, SGSS S.p.A. has to comply with the New Provisions in a manner that suits to its characteristics and size and to the riskiness and complexity in the activity performed, also taking into account the fact that it belongs to the Société Générale Group.

Since it is listed in the list of significant credit institutions issued by ECB, SGSS S.p.A. is subject to all the provisions contained in the New Provisions. Consequently, the variable part of the remuneration and the pay-out process must be handled in compliance with the entire content of Section III, paragraphs 1 and 2, of the New Provisions.

In particular, as far as the locally regulated population is concerned, the content of Section III, paragraph 2.1, bullet point 3. and 4. of the New Provisions must be applied disregarding any inconsistency with the content of the Document, with the exception of the locally regulated population whose annual variable remuneration does not exceed EUR 50,000.00 and does not represent more than one third of the total annual remuneration.

2.3 The main principle of the remuneration policy

The full pay-package is divided between fixed and variable part; among these two components, there must be a clear distinction.

The ratio between fixed and variable part must be duly balanced, determined in detail and carefully evaluated with reference to the characteristics of the intermediary and of the various categories of staff, especially the one of the regulated population. The remuneration policy allows full flexibility as to enable the variable part to be reduced significantly, and even to be cancelled, with reference to the results, weighted by risks, that have actually been achieved.²

Limits to the incidence of the variable part on the fixed part must be defined on an ex ante basis, with a sufficient granularity.

As far as the locally regulated population is concerned the variable part of the remuneration cannot be higher than the fixed part of the remuneration (ratio of 100%), unless the Shareholders' Meeting, in accordance with the by-laws of the bank and consistently with the New Provisions, has approved a different ratio.

The approval from the General Shareholders' meeting of 25 July 2024 to increase the maximum variable/fixed compensation ratio of regulated population to 200% and the respect of this maximum for all CRD V regulated persons (except for the Head of HR, Head of U.O. Compliance, AMLO and the Head of U.O. Global Risk Management, which, as explained hereinafter, are subject to specific provisions); In this regard, the resolution number 1 of the Ordinary General Meeting of 25 July 2024 has been approved by 100% of voters.

As far as the Head of U.O. Human Resource is concerned, the ratio between the variable part of the remuneration and the fixed part of the remuneration cannot be higher than 100%.

As far as the Head of U.O. Compliance, AMLO and the Head of U.O. Global Risk Management are concerned, the ratio between the variable part of the remuneration and the fixed part of the remuneration cannot be higher than 33%.

² Some principles to be considered for the determination of the ratio between the fixed part and the variable part are: type of activities; corporate aims (eg. mutual); quality of performance measuring systems and risk correction; duties and reporting level of staff; overall capitalisation levels. It is not ruled out that for staff whose activities do not affect the risk profile of the bank, remuneration may be entirely or for the most part fixed.

In any case, with reference to Head of U.O. Compliance, AMLO and Head of U.O. Global Risk Management, the incentive mechanisms, if any, are consistent with the tasks assigned and not linked to the results achieved by the areas subject to their control; therefore, bonuses linked to the economic results are avoided. It is instead provided that the grant of the variable part of the remuneration is subject to corporate sustainability objectives - i.e. gates - including cost saving or capital strengthening, provided that this is not a source of potential conflicts of interest.

With reference to employees not included in the locally regulated population, the ratio between the variable part of the remuneration and the fixed part of the remuneration cannot be higher than 100.

As far as managers eventually not included in the locally regulated population and other employees not included in the locally regulated population are concerned, the Board of Directors can authorize exceptions to the aforementioned 100% ratio in case of particular situations duly motivated. Such exceptions have to be communicated to both the Board of Statutory Auditors and the Shareholders' meeting.

2.4 Performance and risk alignment of SGSS S.p.A variable remuneration policy

SGSS S.p.A. remuneration policy promotes sound and effective risk management in the long term, through the method of calculation and allocation of the variable remuneration pools. Section III of the New Provisions is taken into account in the whole process.

2.4.1. The setting of variable remuneration pools

The overall amount of the variable part of the remuneration, allocated or actually paid out, must be sustainable with respect to the financial situation of SGSS S.p.A., and must not limit its ability to retain or reach an adequate level of capitalisation in terms of risks taken.

As described in the Document, the variable remuneration pool for the SGSS (included in GBIS pool) business line (i.e. for all SGSS entities worldwide) is set by the Global Banking and Investor Solutions Division and is subject to validation by the SG Group General Management and finally by the SG Group Board of Directors, upon advice of the SG Group Compensation Committee. The variable remuneration pools take into account the performance and the risks of the activity; the performance criterion taken into account at the SGSS business line level is the Operating Income. The Operating Income is net of operating costs and reflects the main risk associated with the activities of SGSS, i.e. operational risk.

The SGSS Management is responsible for the allocation of the variable remuneration pool amongst all SGSS entities. As such, they send instructions via the SGSS Human Resources line to the various SGSS entities concerning the annual allocation rules for setting of variable remuneration.

In the allocation of the variable remuneration pools, the SGSS Management takes into account several factors, including the contribution of each entity to SGSS results (i.e. Operating Income), the level of operational losses, year-on-year variations in headcount if significant and also more qualitative factors such as the level of achievement of the SGSS business line transformation plan and the independent assessment carried out by the Risk Division and the Compliance Department regarding risk management and regulatory compliance, carried out at the subsidiary level.

Each SGSS entity, including SGSS S.p.A., has then to do the individual allocation of variable remuneration exercise, in accordance with paragraph 2.4.2 of the present Annex.

2.4.2. Individual allocation of variable remuneration

The individual allocation takes into account both quantitative objectives (such as individual performance) and qualitative objectives (i.e. the way the results have been achieved). The employee incentive scheme is not based exclusively on commercial objectives, but is inspired by principles of fairness in relations with clients, legal and reputational risk management, protection and “fidelisation” of clients, and compliance with applicable legal, regulatory and statutory provisions.

For the purpose of the individual attribution of variable remuneration it must be taken into account the compliance with law provisions, regulations and statutory provisions as well as with any ethical code or standards of conduct, promoting the adoption of behaviours consistent with those documents and also spreading out their understanding and their sharing.

Furthermore, quantitative objectives based on financial indicators should be risk-adjusted, contributing to ensure the consistency of the remuneration and incentive system with the reference framework for determining the Bank's risk appetite (Risk Appetite Framework - "RAF"), also by defining the risk indicators to be used for the correction mechanisms (ex ante and ex post).

Consistently with the aforementioned objectives, SG Group has established a global individual performance evaluation process and tool which sets a common standard for competencies and behaviours at each level and provides training to managers on appropriate evaluation methods. As part of the annual performance appraisal process, the objectives given to employees include formal qualitative objectives including the quality of risk management and the means and behaviours used to achieve the results. There is no automatic link between the performance appraisal ratings and the individual variable remuneration amounts and the individual variable remuneration proposals are subject to several levels of review by management and Human Resources function to ensure correlation between the individual variable remuneration amounts proposed and the results of the individual performance appraisal.

Finally, the award of a guaranteed variable remuneration is strictly regulated within the SG Group and limited in the context of hiring to one year, always in compliance with the New Provisions' requirements.

The Bank requires that its personnel, through specific agreements, do not use personal hedging strategies or insurance tools covering compensation or other aspects that may alter or jeopardise the effects of risk alignment typical of the remuneration mechanisms. The Bank requires, in any case, that the regulated population, through specific agreements, communicates the existence or the activation of custody and administration accounts also with other intermediaries.

The Bank also identifies the types of transactions and financial investments directly or indirectly carried out by the regulated population that could affect the risk alignment mechanisms and, more generally, the respect of the purposes of these regulations. If these operations and financial investments are made on the basis of an initiative addressed to the workforce by the Bank or by another company of the Société Générale Group, the Bank's remuneration policies provide adequate information on the matter and justify its consistency with the purposes of the present regulation. In any case, the Bank requires that the regulated population discloses the operations and financial investments carried out that may fall within the types previously identified, taking into account the information received in calibrating the remuneration and incentive systems for personnel, with particular regard to the mechanisms of alignment to the risks and to the Bank's assets and financial position (e.g. duration of the deferral period, malus and claw-back systems, etc.).

The Bank, with regards to the above transactions and investments, considering that every year the regulated population signs a letter where it is explained the prohibition of hedging strategies and considering that the instruments used as rewards by SGSS are SG shares, has identified the following:

Put Options, Covered Warrant, futures and derivative products on volatility and more generally

any strategy to hedge the endogenous risk of Société Générale.

2.5 Threshold for the application of the variable remuneration pay-out process

The threshold for the variable remuneration payout for Regulated People will be equal to EUR 50,000.00; it will apply only for those employees whose annual variable remuneration does not exceed such threshold and does not represent more than one third of the total annual remuneration. The bonus of an amount less than or equal to the threshold approved by the Shareholders' meeting shall be paid entirely in cash and without any deferral; this is because the application of the content of Section III, paragraph 2.1, bullet point 3. and 4. of the New Provisions would not be significant in both absolute and relative terms compared to total remuneration perceived, to the point of invalidating de facto the guiding principle of the mechanism (correlation between the amount of the bonus and risk-taking).

For NON regulated people a part of their variable remuneration could be deferred over time due to the level of their variable remuneration according to SG Group best practices.

2.6 Essential aspects of the remuneration and incentive system

2.6.1 Principles

Consistently with the above, the Bank has implemented a remuneration and incentive system addressed to all its employees and collaborators, which reflects the criteria and requirements provided for by the New Provisions. In particular, this system is aimed at:

- promoting the Bank's competitiveness and fair governance;
- attracting and retaining individuals with professional skills and abilities suitable to the needs of the company;
- allowing compliance with the objectives, corporate values and long-term strategies;
- safeguarding the Bank's prudent risk management policies, consistently with what is defined by the provisions on the prudential control process;
- ensuring consistency with the reference framework for the determination of risk appetite (R.A.F.) and with the governance and risk management policies;
- taking into account the cost and the capital and liquidity level necessary to cover the activities undertaken and being organized so as to prevent that some incentives are in conflict with the Bank's interest with a long-term perspective;
- contributing to the pursuit of complete equality among employees, and ensuring that, for the same activity carried out, employees have an equal level of remuneration, also in terms of the conditions for its recognition and payment;
- favouring the compliance with all the law provisions, regulations and statutory provisions, as well as any ethical code or other standards of conduct applicable to the Bank.

In this regard, it should be noted that the remuneration and incentive system implemented by the Bank does not provide for:

- the disbursement of any form of remuneration or payments or other benefits paid by vehicles, instruments or methods that are in any case in breach of these provisions;
- *carried interest*;
- any type or form of guaranteed variable remuneration, except in special cases aimed at hiring new employees and limited to the first year of employment, in compliance with the New Provisions (i.e. entry bonus);
- the provision of any type of discretionary pension benefits other than those established by the pension system provided for by law and by collective bargaining applicable to the Bank;
- without prejudice to non-competition agreements and severance treatments as described below, any form of remuneration agreed before or in the occasion of the early termination of the employment relationship and/or for early termination of corporate office (i.e. Golden parachute). The application of the rules on variable remuneration to the compensation of the non-competition agreement – which is

included in the variable component of the remuneration – is limited to the part exceeding 100% of the fixed component on an annual basis. Furthermore, the compensation of the non-competition agreement is not included in the calculation of the limit to the variable/fixed remuneration ratio, if, and so far as, by dividing the total amount of the compensation of the non-competition agreement by the number of years of its length, the annual quota of the compensation of the agreement does not exceed the last fixed annual remuneration.

The remuneration and incentive system implemented by the Bank, addressed to its employees and collaborators, provides for the payment of a fixed component and, for the subjects for which it is established, of a variable component.

In particular, these components are implemented by the Bank through the following principles and methods.

2.6.2 Fixed component

The fixed component of the remuneration, with reference to employees and collaborators, rewards the position held (hierarchical level), the tasks assigned and the extent of the responsibilities, reflecting the experience and the capacity required for each position as well as the quality of the contribution to the company results, the characteristics of the performance measurement systems and the related risk correction.

The fixed component is sufficient to allow the variable part to be reduced significantly, and even to be cancelled, in relation to the results, adjusted based on the risks actually achieved.

In accordance with the applicable legislation and based on the current remuneration system implemented by the Bank, the following main types of remuneration are included among the fixed component:

- gross annual remuneration;
- fringe benefits (where provided for and granted);
- components related to the continuative and specific performance modalities, such as, for example, expatriation and role allowances (as long as they qualify as fixed remuneration pursuant to the EBA's and New Provisions' guidelines).

2.6.3 Variable component of the remuneration

Variable remuneration reflects a sustainable and risk adjusted performance as well as performance in excess of that required to fulfil the employee's job description as part of the terms of employment.

The variable remuneration pool is determined on the basis of:

- the collective performance of the entity (organisational unit/activity), taking into account the economic context and market environment/practices, financial results achieved, taking into account the need for consistency with the timing and likelihood of the Bank receiving potential future revenues incorporated into current earnings;
- adjustments for all types of current and future risks and the liquidity cost and capital requirements in light of the Risk Appetite targets.

The variable remuneration pools within SG Group are determined by business unit, at a global level, in order to ensure financial solidarity between the various activities and avoid conflicts of interest.

They are set on the basis of:

- the collective financial results taking into account the risks and the Finance department ensuring that the total amount of variable remuneration does not undermine the SG Group's capacity to meet its objectives in terms of capital requirements.

- qualitative factors such as market practices, conditions under which activities are carried out and risk and compliance management (through an independent appraisal process performed by the Risk and Compliance Divisions).

At individual level, the allocation of variable compensation takes into account:

- the employee's achievement of quantitative and qualitative objectives set at the beginning of the year;
- the assessment of the employee's conduct, risk management behaviour, respect of internal procedures and compliance and adherence to SG Group Leadership Model values;
- input from control functions;
- compensation practices and internal consistency.

All the instruments that contribute to the determination of the variable component of the remuneration take in due account of the need to ensure the compliance with the rules of fair conduct.

Furthermore, with particular reference to the variable component, it should be noted that the remuneration and incentive system implemented by the Bank, provides for the following principles:

- the rate of the variable component over the fixed component is established ex ante with specific limits defined in a granular way on the basis of the position and the responsibilities assigned to each employee and collaborator, as set in point 2.3 above;
- the variable component is calculated on the basis of performance indicators, net of risks, and consistent with the measures used for management purposes by the Risk Management Function (i.e. risk adjustment);
- to allocate and to assign the variable component, they are taken into account the risks and results of the Bank and of Société Générale Group as a whole, those of each Departments/Organizational Units and those of the individual subjects, consistently with the positions, the responsibilities and the levels of decision-making assigned to employees and collaborators;
- part of any bonus awarded may be deferred in line with the rules of the SG Fidelity Bonus Plan. Payments are linked to the performance of SG Group and applicable business lines against targets as agreed with the SG Group Board. Where performance conditions are not met the deferred component is partially or fully forfeited. The terms of each year's deferral plan will be communicated to employees concerned at the time of the bonus announcement for the calendar year in question. In particular, the part of variable remuneration covered by deferred payment systems, if any, is subject to ex post correction mechanisms (i.e. malus and claw back), suitable to reflect the performance levels, net of the risks actually assumed or achieved, and capital levels, as well as to take into account the individual behaviour. These mechanisms, where applied, can lead to a reduction, even significant, of the variable remuneration itself, especially in case of results significantly lower than the target pre-established or negative, or if the Bank is unable to maintain or restore a sound capital basis.

Long-term incentives (LTI) in the form of grant of SG Group shares are proposed at SG Group level to motivate and retain SG Group's high performers and strategic talents (subject to eligibility according to the criteria defined by the SG Group).

Thanks to its medium-term maturity and vesting conditions, it aims to build loyalty of the beneficiaries and to align their interests more closely with those of shareholders. LTIs are not a recurrent remuneration element.

The vesting period runs from the date of the conditional grant until the actual date on which ownership of the shares is transferred to the employee. During the entire vesting period, the beneficiary only holds conditional rights to performance shares.

The LTIs budget request is estimated using both quantitative criteria (staffing trends; fixed salary costs evolution; eccetera) and qualitative criteria (retention issues; strategic talents policy; strategic projects; eccetera).

At the end of the vesting period, the employee becomes a shareholder of SG Group. SG Group shares will be delivered with dividend and voting rights attached. It means that the employee will receive all dividends on which the General Assembly voted after the vesting date and that, from this date, they will be able to exercise the voting rights. SG Group shares will be subject to a minimum holding period of one year (lock-up).

The Bank, where appropriate according to the New Provisions, reserves the right to enter into retention and stability covenants, in response to the payment of a compensation (retention bonus), which represent a variable remuneration for the purposes of this Annex as well.

2.6.4 Setting of objectives campaign and Performance evaluation period (accrual period)

The setting of objectives and the assessment of performance against the objectives are a key determinant of the input to the bonus process.

The core objectives and key priorities for the Bank have been published to provide clear guidance to all employees.

These key priorities of the business and the Bank's vision, purpose and core values are expected to be reflected in the objectives of employees throughout the organisation.

The year-end performance review process was launched with clear guidelines, timetable and help notes. All employees will complete a self-assessment prior to a discussion between line managers and employees.

Employees' annual performance is assessed every year against their objectives (Job Requirements, Operational Objectives and Behavioral Development) during November/December.

The manager determines the remuneration proposals, by linking the appropriate set of performance parameters (Group performance, entity performance, individual performance) and elements of context (market environment, benchmarking, regulation, etc.) together.

There is a specific focus on the assessment of risk and compliance performance in order to engender a more robust and accountable culture.

Remuneration policies are more and more framed by banking regulation which has now become a key factor. Risk and Compliance departments' roles in the ACR process have therefore increased following the new regulatory framework.

One of their main roles is the evaluation of risk and compliance management at the level of the business activity (BU/SU and sub-BU/sub-SU level), as well as at the individual level (mainly regulated staff under CRDV, AIFMD and Volcker Rule/French Banking Law). Furthermore, the EBA Guidelines on remuneration policies, the ESMA Guidelines on certain aspects of MiFID II remuneration requirements (ESMA35-43-3565), where applicable, are also taken into account.

A negative evaluation on risk and/or compliance is taken into account to determine the proposed bonus. Moreover, in case of unacceptable risk taking behavior, the malus clause on deferred remuneration can be activated.

Performance evaluation period (accrual period) could be annual and/or multi-annual and takes into account the levels of capital assets and liquidity necessary to meet the activities undertaken, without restricting in any case the Bank's ability to maintain appropriate capitalization levels.

2.6.5 Conditions to access to the variable component (gates)

In order to guarantee the maintenance of appropriate capitalization levels, the remuneration system implemented by the Bank provides for specific capital and economic conditions to fulfil for the variable component of the remuneration to be paid.

In particular, the payment of the variable component is subject to the conservation of the specific requirements representative of the Bank's capital strength (Total Capital Ratio) and of the related level of liquidity (Liquidity Coverage Ratio), which cannot be lower than the regulatory limits.

2.6.6 Ex post correction mechanisms (malus and claw back)

The remuneration and incentive system adopted by the Bank provides for ex post correction mechanisms suitable also to reflect the performance levels, net of the risks actually assumed or achieved.

First of all, if the recipient is liable for fraudulent behaviours or gross negligence, which also influenced directly or indirectly the results considered for the attribution of the variable

remuneration, the payment will not be finalized, or, where already paid, the recipient shall return the undue amount (claw back clause).

In particular, the Bank applies specific claw back mechanisms to the variable component approved and/or paid to the parties who determined or helped to determine:

- behaviours not compliant with law provisions, regulations and statutory provisions as well as with any ethical codes or standards of conduct applicable to the Bank, that caused a significant loss – namely a capital or non-pecuniary prejudice higher than Euro 100,000.00 – for the Bank, both direct and indirect (i.e. consequential repercussions on customers of the Bank);
- violations of the obligations relating to corporate representatives pursuant to art. 26 of the TUB, to art. 53, paragraph 4, of the TUB (when the individual is an interested party) and of the obligations regarding remuneration and incentives;
- fraudulent behaviour or gross negligence to the detriment of the Bank, suitable of integrating a case of dismissal for just cause pursuant to art. 2119 or 2383 cod. civ., where acknowledged during the employment relationship.

Claw-back's length cannot be shorter than 5 years.

Specific malus mechanisms are applied, in addition to the claw back clause's applications said above, also to take into account the performance levels, net of the risks actually assumed or pursued and the performance of the Bank and/or the Group Société Générale's capital strength and liquidity.

It should be noted that the ex post correction mechanisms can not lead to an increase in the initially granted variable remuneration or to the variable remuneration previously lowered or reduced to zero following the application of malus or claw back clause.

2.6.7 The remuneration system for the regulated population

The remuneration and incentive system adopted by the Bank for the employees and the collaborators considered as regulated population - notwithstanding the exclusion referred to in section 2.5 above and in addition to the aforementioned principles applicable to the personnel in general - also provides for the following more efficient and precautionary measures:

- the ratio between the variable component and the fixed component of individual remuneration is defined consistently with the provisions of paragraph 2.3 above;
- the variable component is subject, for a quota of at least 40%, to deferred payment systems for at least 4 years, in order to guarantee the assessment over time of the performance of the risks assumed by the Bank (malus mechanisms);
- the variable component, both in its deferred component and in the up-front component, is acknowledged, for a quota of at least 50%, in shares, instruments connected to them or instruments whose value reflects the economic value of the Bank or of the Group (the Bank has adopted, as a financial instrument for the payment of the variable component in kind, SG Quasi shares subject to vesting or forfeitures conditions). If the quota consisting in financial instruments exceeds 50% of the total variable remuneration, the portion of financial instruments to be deferred will be bigger than the portion of them to be paid up-front;
- for the executive directors, the general manager, the joint general managers, the deputy general managers and other similar figures, the heads of the main business areas, corporate functions and geographical areas, as well as those who report directly to the strategic supervisory bodies, management and control, the variable component is subject, for a quota of 50%, to deferred payment systems; the duration of the deferral period cannot be shorter than 5 years and 60% of the deferred quota is made of financial instruments;
- if the variable component represents a particularly high amount - as defined below - the deferred quota is equal to 60%; the duration of the deferral period cannot be shorter than 5 years and 60% of the deferred quota is made of financial instruments;

- the deferred quota shall be paid during the deferral period no faster than by a linear pro rata basis, provided that the payment frequency is at least annual;
- the financial instruments are subject to a lock-up period, starting from the moment when they are paid (retention period), during which they cannot be sold. This period lasts 1 year for the paid up-front part and for the deferred part;
- before the end of the deferral period, dividends or interests shall not be paid.

For the purposes of the deferral period, "particularly high amount" means the lower between:

- 25% of the average total remuneration of Italian high earners, as resulting from the most recent EBA report;
- 10 times the average total remuneration of the Bank's employees.

The lowest of the aforementioned values is, with reference to the Bank, approximately 522,000.00 Euro and shall be updated by the Bank at least every three years.

2.6.8 Severance

Discretionary payments (i.e. payments in addition to severance payments owed by law or in accordance with collective bargaining agreements, as required by labour law), linked to the early termination of an employment contract, are under no circumstances set out contractually in advance (e.g. golden parachutes are strictly forbidden). They are determined at the time the employee leaves the Bank, taking into account local legal constraints.

2.7 Gender neutrality - 2024 SG group Methodology for Equal pay exercise

Within the ESG framework put in place, the SG Group's diversity and inclusion policy aims to fight bias and create a culture of inclusion. This Diversity and Inclusion policy reflects the SG Group's determination to recognise and promote all talents, whatever their beliefs, age, disability, parenthood status, ethnic origin, nationality, sexual or gender identity, sexual orientation, membership in a political, religious, trade union or minority organisation, or any other characteristic that could be subject to discrimination. The SG Group is committed to creating the conditions for an inclusive organisation offering equal treatment to all employees, in particular in all HR processes.

The gender-neutral policy principle "same pay for same work or work of equal value" is part of the CRD V Directive. The application is for all SG employees and on a worldwide basis. According to EBA guidelines, in order to monitor that gender-neutral remuneration policies are applied, institutions should document appropriately the value of the position for all staff members or categories of staff and determine which positions are considered as having an equal value, e.g. by implementing a job classification system, taking into account at least the type of activities, the tasks and duties assigned to the position or staff member. In this context, as well as in order to be able to produce equal pay indicators at the level of the Group, we have undertaken the deployment of a group methodology for measuring the remuneration gaps between women and men in a same geographical environment, same field of activity, same job position and level of responsibility.

In each country and for each local entity, several indicators have been calculated in order to measure pay gaps at different levels (at the level of the entity, at the level of the BU/SU within the entity, at the level of the SubBU/sub SU within the entity for men and women grouped into homogenous groups, called comparison groups, and the methodology used for 2024 is based on the 2 following criterias.

Same Environment/Activity (same BU/SU or same sub-BU/SU or same Path)

1. Same Job Code
2. Same level of responsibility (Group Classification/Corporate Title)

As explained in the “Equal Pay” Comp&Ben Document the group contains at least 1 Men and 1 Women identified, it’s a priority for analysis.

Within the same group, the difference in average total remuneration are calculated for women and men as follows:

For every woman: the gap is calculated compared to the average total remuneration of men in their comparison group. Total remuneration: fixed salary as of May 2024 including allowances (RBA, etc.) + 2023 bonus (pay gap on fixed or bonus only will not be taken into account in Equal Pay).

Priority 1 (P1): whose group has a significant gap ($\geq 5\%$) and the individual gap is also ($\geq 5\%$) in total REM & Fixed and/or Bonus.

Priority 2 (P2): individual gap is ($\geq 10\%$) in total REM & Fixed and/or bonus.

The aim is to look at all the employees who have an unfavourable individual P1 or P2 gap compared with their comparison group. The next step is to :

Indicate whether the gap can be explained by objective factors (i.e. level of education, content of tasks, scope of responsibilities, skills/level of expertise, length of professional experience overall and/or in the current position, seniority in the classification level, performance, geographical location).

If the gap cannot be explained, or can only be partially explained, corrective action should be estimated in terms of fixed and/or variable remuneration.

For ACR 2024/25 SGSS Spa received in August the eligible list (permanent contract as of May 2024; entries after 31st March 2023 - external recruitment - are not taken into account in EP) with all the compensation datas and gaps.

The guideline was to focus the analysis on gap in disfavour of Women, and to focus on Priority 1 and Priority 2, fix and/or variable equal pay gap.

The proposed approach for analysing individual cases was to focus on priority 1 and priority 2, and, for each case:

1. To indicate whether the gap can be explained by objective criteria (Yes/No);
2. To indicate the objective criteria if Yes;

After the analysis and once U.O. HR have been notified for a specific dedicated budget, SG (Comp&Ben department) implements the proposed catch-ups in PSG (ACR tool) to ensure that the amounts determined by HRBP are respected.

In addition, starting from exercise 2023, for EXCO members the following ESG objectives will be set in the evaluation tool:

She/he embodies and promote responsibility within SGSS, and more specifically

- She/ he takes into account SGSS axis regarding D&I, C&C and ESG within her/his perimeter of responsibility
- She/he engage her/ his managerial line and promote awareness and training for all the staff on these axis
- She/he is open to dialog and promote speak-up culture.

SGSS S.p.A. successfully accomplished the UNI/PdR 125:2022 certification on 13/12/2023 renouveted also for 2025 after an audit verification in December 2024.

Part 3 – Information concerning ACR 2024-2025

For the 2024 reference year, taking into account paragraph 2.1 of the present Annex and in compliance with the New Provisions, the following subjects within SGSS S.p.A. have been included in the category of locally regulated population:

- GM;
- DGM Corporate;
- Head of Global Risk Management
- Head of Technology & Transformation;
- Head of Fund Service Operation;
- Head of Compliance;
- Head of Finance;
- Head of Coverage, Marketing & Solutions;
- Head of Human Resources;
- Head of Legal Affairs;
- Head of Tax;
- Chief Information Security Officer (CISO);
- Head of Securities Banking Operations

EU REM SCHEMES

TAB EU REM A

QUALITATIVE INFORMATION
a - information relating to the bodies responsible for supervising remuneration
<p>Remuneration Committee (5 meetings in 2024), Board of Directors (4 meetings in 2024 related to Remuneration Policies), Shareholders Assembly (2 assemblies in 2024).</p> <p>The Remuneration Committee (hereinafter CRE), set up to ensure the consistency of the systems incentives and remuneration with the Bank's overall choices in terms of risk assumption, strategies, long-term objectives, corporate governance structure and internal controls, has an advisory function.</p> <p>The CRE is made up of three non-executive directors, the majority of whom meet the requirements of independence, in line with the provisions of the Bank of Italy on the matter. Such administrators are equipped with the knowledge, skills and experience suitable and functional to the performance of the specific tasks of the Committee, as shown below. At least one component has an adequate experience in accounting and finance or risk management, to be evaluated by the Board of Directors at the time of appointment.</p> <p>Preliminary investigation and proposal to support the Board of Directors, for the purposes of the recruitment, by the latter of the relevant resolutions.</p> <p>Entities in scope: Société Générale Securities Services S.p.A. (SGSS S.p.A.) - SGSS S.p.A. is an unlisted Italian bank fully controlled by Société Générale S.A.</p> <p>This policy applies to all the employees and in particular to Regulated Staff. As a result, have been identified 13 subjects within SGSS SpA (9 less compared with previous year) plus 7 members within the Board of Directors.</p>
b- information relating to the characteristics and structure of the remuneration system for CRDV regulated staff
<p>As detailed in the Document, the Group Compensation Committee reviews annually the remuneration policy applicable within the SG Group and in particular the remuneration policy and the identification of regulated employees (hereinafter also defined "regulated population") at the SG Group level.</p> <p>Remuneration Policy has been revised by Remuneration Committee in July 2024 - modifications: increase ratio variable/fix remuneration for Regulated Population (better explained hereinafter in letter D); reduction of number of Regulated Population involved whose professional activities have a material impact on the Bank's risk profile, including employees exercising control functions. These modifications have been implemented to be aligned with SG Policy.</p> <p>The Head of U.O. Human Resources, in coordination with the Group's Human Resources Department and with the assistance of the Head of U.O. Global Risk Management and the Head of U.O. Compliance, shall perform an accurate self-assessment to identify the regulated population at SGSS S.p.A. This process must be based on the recognition and evaluation of individual positions (responsibility, hierarchical levels, activities performed, operational proxies, etc.), essential elements for an evaluation of the relevance of each subject in terms of the taking of risks by SGSS S.p.A.</p> <p>Quantitative objectives based on financial indicators should be risk-adjusted, contributing to ensure the consistency of the remuneration and incentive system with the reference framework for determining the Bank's risk appetite (Risk Appetite Framework - "RAF"), also by defining the risk indicators to be used for the correction mechanisms (ex ante and ex post).</p> <p>Consistently with the aforementioned objectives, SG Group has established a global individual performance evaluation process and tool which sets a common standard for competencies and behaviours at each level and provides training to managers on appropriate evaluation methods. As part of the annual performance appraisal process, the objectives given to employees include formal qualitative objectives including the quality of risk management and the means and behaviours used to achieve the results. There is no automatic link between the performance appraisal ratings and the individual variable remuneration amounts and the individual variable remuneration proposals are subject to several levels of review by management and Human Resources function to ensure correlation between the individual variable remuneration amounts proposed and the results of the individual performance appraisal.</p> <p>As far as the Head of Human Resources is concerned, the ratio between the variable part of the remuneration and the fixed part of the remuneration cannot be higher than 100%.</p> <p>As far as the Head of U.O. Compliance, AMLO and the Head of U.O. Global Risk Management are</p>

concerned, the ratio between the variable part of the remuneration and the fixed part of the remuneration cannot be higher than 33%.

Severance: Discretionary payments (i.e. payments in addition to severance payments owed by law or in accordance with collective bargaining agreements, as required by labour law), linked to the early termination of an employment contract, are under no circumstances set out contractually in advance (e.g. golden parachutes are strictly forbidden). They are determined at the time the employee leaves the Bank, taking into account local legal constraints.

Claw Back: The remuneration and incentive system adopted by the Bank provides for ex post correction mechanisms suitable also to reflect the performance levels, net of the risks actually assumed or achieved. In particular, the Bank applies specific claw back mechanisms to the variable component approved and/or paid to the parties who determined or helped to determine behaviour not compliant with the law or fraudulent behaviour.

The identification of the locally regulated population is to be annually performed in compliance with the New Provisions and the Regulation and the relevant list has to be submitted to the Group's Human Resources Department for validation.

c- description of how current and future risks are taken into account in the remuneration processes. The information includes a summary of the main risks, their measurement and how these measures affect remuneration.

SGSS S.p.A. remuneration policy promotes sound and effective risk management in the long term, through the method of calculation and allocation of the variable remuneration pools. Section III of the "New Provisions" is taken into account in the whole process.

d- the ratios between the fixed and variable components of the remuneration established in accordance with Article 94(1)(g) of the CRD

As far as the locally regulated population is concerned the variable part of the remuneration cannot be higher than the fixed part of the remuneration (ratio of 100%), unless the Shareholders' Meeting, in accordance with the by-laws of the bank and consistently with the New Provisions, has approved a different ratio. The approval from the General Shareholders' meeting of 25 July 2024 to increase the maximum variable/fixed compensation ratio of regulated population to 200% and the respect of this maximum for all CRD V regulated persons (except for the Head of HR, Head of U.O. Compliance, AMLO and the Head of U.O. Global Risk Management, which, as explained hereinafter, are subject to specific provisions); In this regard, the resolution number 1 of the Ordinary General Meeting of 25 July 2024 has been approved by 100% of voters.

e- description of how the institution seeks to link performance over the assessment period to remuneration levels

The individual allocation takes into account both quantitative objectives (such as individual performance) and qualitative objectives (i.e. the way the results have been achieved). The employee incentive scheme is not based exclusively on commercial objectives, but is inspired by principles of fairness in relations with clients, legal and reputational risk management, protection and "fidelisation" of clients, and compliance with applicable legal, regulatory and statutory provisions. Consistently with the aforementioned objectives, SG Group has established a global individual performance evaluation process and tool which sets a common standard for competencies and behaviours at each level and provides training to managers on appropriate evaluation methods. As part of the annual performance appraisal process, the objectives given to employees include formal qualitative objectives including the quality of risk management and the means and behaviours used to achieve the results.

Here below the criteria used for performance evaluation: - the collective financial results taking into account the risks and the Finance department ensuring that the total amount of variable remuneration does not undermine the SG Group's capacity to meet its objectives in terms of capital requirements; - qualitative factors such as market practices, conditions under which activities are carried out and risk and compliance management (through an independent appraisal process performed by the Risk and Compliance Divisions).

At individual level, the allocation of variable compensation takes into account: - the employee's achievement of quantitative and qualitative objectives set at the beginning of the year, - the assessment of the employee's conduct, risk management behaviour, respect of internal procedures and compliance and adherence to SG Group Leadership Model values, - input from control functions, - compensation practices and internal consistency.

All the instruments that contribute to the determination of the variable component of the remuneration take in due account of the need to ensure the compliance with the rules of fair conduct. Furthermore, with particular reference to the variable component, it should be noted that the remuneration and incentive system implemented by the Bank, provides for the following

principles: - the rate of the variable component over the fixed component is established ex ante with specific limits defined in a granular way on the basis of the position and the responsibilities assigned to each employee and collaborator, as set in point 2.3 above; - the variable component is calculated on the basis of performance indicators, net of risks, and consistent with the measures used for management purposes by the Risk Management Function (i.e. risk adjustment); - to allocate and to assign the variable component, they are taken into account the risks and results of the Bank and of Société Générale Group as a whole, those of each Departments/Organizational Units and those of the individual subjects, consistently with the positions, the responsibilities and the levels of decision-making assigned to employees and collaborators; - part of any bonus awarded may be deferred in line with the rules of the SG Fidelity Bonus Plan. Payments are linked to the performance of SG Group and applicable business lines against targets as agreed with the SG Group Board. Where performance conditions are not met the deferred component is partially or fully forfeited. The terms of each year's deferral plan will be communicated to employees concerned at the time of the bonus announcement for the calendar year in question. In particular, the part of variable remuneration covered by deferred payment systems, if any, is subject to ex post correction mechanisms (i.e. malus and claw back), suitable to reflect the performance levels, net of the risks actually assumed or achieved, and capital levels, as well as to take into account the individual behaviour. These mechanisms, where applied, can lead to a reduction, even significant, of the variable remuneration itself, especially in case of results significantly lower than the target preestablished or negative, or if the Bank is unable to maintain or restore a sound capital basis. In terms of Risk adjustments, the Bank requires that its personnel, through specific agreements, do not use personal hedging strategies or insurance tools covering compensation or other aspects that may alter or jeopardise the effects of risk alignment typical of the remuneration mechanisms. The Bank requires, in any case, that the regulated population, through specific agreements, communicates the existence or the activation of custody and administration accounts also with other intermediaries.

f- description of how the institution seeks to adjust remuneration to reflect long-term performance

The threshold for the variable remuneration payout for Regulated Population will be equal to EUR 50,000.00; it will apply only for those employees whose annual variable remuneration does not exceed such threshold and does not represent more than one third of the total annual remuneration. The bonus of an amount less than or equal to the threshold approved by the Shareholders' meeting shall be paid entirely in cash and without any deferral.

The ratio between the variable component and the fixed component of individual remuneration is defined consistently with the provisions of paragraph 2.3 above;

The variable component is subject, for a quota of at least 40%, to deferred payment systems for at least 4 years, in order to guarantee the assessment over time of the performance of the risks assumed by the Bank (malus mechanisms); (see paragraph 2.6.7)

The variable component, both in its deferred component and in the up-front component, is acknowledged, for a quota of at least 50%, in shares, instruments connected to them or instruments whose value reflects the economic value of the Bank or of the Group (the Bank has adopted, as a financial instrument for the payment of the variable component in kind, SG Quasi shares subject to vesting or forfeitures conditions). If the quota consisting in financial instruments exceeds 50% of the total variable remuneration, the portion of financial instruments to be deferred will be bigger than the portion of them to be paid up-front;

For the executive directors, the general manager, the joint general managers, the deputy general managers and other similar figures, the heads of the main business areas, corporate functions and geographical areas, as well as those who report directly to the strategic supervisory bodies, management and control, the variable component is subject, for a quota of 50%, to deferred payment systems; the duration of the deferral period cannot be shorter than 5 years and 60% of the deferred quota is made of financial instruments.

If the recipient is liable for fraudulent behaviours or gross negligence, which also influenced directly or indirectly the results considered for the attribution of the variable remuneration, the payment will not be finalized, or, where already paid, the recipient shall return the undue amount (claw back clause).

For NON regulated people a part of their variable remuneration could be deferred over time due to the level of their variable remuneration according to SG Group best practices.

g- the description of the main parameters and rationale for any variable remuneration scheme and any other non-monetary benefit according to Article 450(1)(f) of the CRR

N/A – these parameters are managed by Parent Company.

h- at the request of the relevant member state or competent authority, the total remuneration for each member of the management body or senior management
N/A
i- information on whether an institution is waived under Article 94(3) of the CRD in accordance with Article 450(1)(k) of the CRR
Based on letter b) <ul style="list-style-type: none"> - Number of employees 7 - Total compensation 968.739 - Fixed remuneration 778.539 - Variable remuneration 195.200
j- large institutions publish quantitative information on the remuneration of the collective management body, distinguishing between executive and non-executive members, according to Article 450(2) of CRR
N/A

In addition to what already described in Part 1 and Part 2 of the present Italian annex, the following are the information about remuneration for financial year 2024 due in accordance with the New Provision and art. 450 of the CRR.

Figures are expressed in EUR.

TAB EU REM 1 Remunerazione riconosciuta per l'esercizio			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed Remuneration	Number of identified staff	7	1	7	5
2		Total fixed remuneration	100.000	265.000	1.054.000	498.500
3		Of which: cash-based	100.000	250.000	980.000	463.500
4		(Not applicable in the EU)				
Eu-4a		Of which: shares or equivalent ownership interests				
5		Of which: share-linked instruments or equivalent non-cash instruments				
EU-5x		Of which: other instruments				
6		(Not applicable in the EU)				
7		Of which: other forms		15.000	74.000	35.000
8	(Not applicable in the EU)					
9	Variable Remuneration	Number of identified staff	7	1	7	5
10		Total variable remuneration		271.600	629.200	96.000
11		Of which: cash-based		122.200	337.700	96.000
12		Of which: deferred		54.300	106.000	0
EU-13a		Of which: shares or equivalent ownership interests				
EU-14a		Of which: deferred				
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments		149.400	291.500	0
EU-14b		Of which: deferred		81.500	159.000	0
EU-14x		Of which: other instruments				
EU-14y	Of which: deferred					
15	Of which: other forms					
16	Of which: deferred					
17		Remunerazione complessiva (2+10)	100.000	536.600	1.683.200	594.500

		a	b	c	d
	TAB EU REM2 Pagamenti speciali al personale le cui attività professionali hanno un impatto rilevante sul profilo di rischio dell'ente (personale più rilevante)	MB Supervisory function	MB Management Function	Other Senior Management	other identified Staff
	Guaranteed variable remuneration awards				
1	Guaranteed variable remuneration awards - Number of identified staff	0	0	0	0
2	Guaranteed variable remuneration awards -Total amount	0	0	0	0
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	0	0	0	0
	Severance payments awarded in previous periods, that have been paid out during the financial year				
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	0	0	1	0
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	0	0	17.600	0
	Severance payments awarded during the financial year				
6	Severance payments awarded during the financial year - Number of identified staff	0	0	0	0
7	Severance payments awarded during the financial year - Total amount	0	0	0	0
8	Of which paid during the financial year	0	0	0	0
9	Of which deferred	0	0	0	0
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	0	0	0	0
11	Of which highest payment that has been awarded to a single person	0	0	0	0

	a	b	c	d	e	f	g	h
EU REM 3	total amount of deferred remuneration awarded for previous performance periods	of which due to vest in the financial year	of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the future performance years	total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
MB Supervisory function								
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
MB Management function	305.221,00	122.282,00	182.939,00	-	-	- 1.907,00	104.127,00	47.482,00
Cash-based	118.900,00	68.400,00	50.500,00	-	-	-	68.400,00	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	186.321,00	53.882,00	132.439,00	-	-	- 1.907,00	35.727,00	47.482,00
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Other senior management	684.009,00	275.604,00	408.405,00			- 8.887,00	252.944,00	124.677,00
Cash-based	291.150,00	160.150,00	131.000,00				160.150,00	11.000,00
Shares or equivalent ownership interests								
Share-linked instruments or equivalent non-cash instruments	392.859,00	115.454,00	277.405,00			- 8.887,00	92.794,00	113.677,00
Other instruments								
Other forms								
Other identified staff								
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Total amount	989.230,00	397.886,00	591.344,00	-	-	-10.794,00	357.071,00	172.159,00

TAB EU REM4		a
Remunerazione di 1mln di EUR o più per esercizio		
	EUR	Identified Staff that are high earners as set out in Article 450 CRR

1	1.000.000 to below 1.500.000	0
2	1.500.000 to below 2.000.000	0
3	2.000.000 to below 2.500.000	0
4	2.500.000 to below 3.000.000	0
5	3.000.000 to below 3.500.000	0
6	3.500.000 to below 4.000.000	0
7	4.000.000 to below 4.500.000	0
8	4.500.000 to below 5.000.000	0
9	5.000.000 to below 6.000.000	0
10	6.000.000 to below 7.000.000	0
11	7.000.000 to below 8.000.000	0

TAB EU REM 5	Management body remuneration			Business areas						
	MB Supervisory function	MB Management function	total MB	investment banking	retail banking	asset management	corporate functions	independent internal control functions	all other	total
1	Total number of identified staff									
2	7	1	8							8
3	of which: other senior management									
4							7			7
5	of which: other identified staff									
6	100.000	536.600	636.600					2	3	5
7	total remuneration of identified staff									
8		271.600	271.600				1.683.200,0	264.500	330.000	2.914.300
9	of which: variable remuneration									
10	100.000	265.000	365.000				629.200	44.500	51.500	996.800
11	of which: fixed remuneration									
12							1.054.000	220.000	278.500	1.917.500