

EUREX

Eurex Clearing AG

Remuneration Report for 2024

This report discloses information on remuneration 2024 for
Eurex Clearing AG

according to

Article 450 of the Regulation (EU) No 2019/876 of the
European Parliament and of the Council of 20 May 2019
amending Regulation (EU) No 575/2013 (CRR II) and
Regulation (EU) No 648/2012 (EMIR) and

§ 16 of the German Remuneration Ordinance for Institutions
(InstitutsVergV) of 16 December 2013 (BGBl. I p. 4270) last
amended by Article 1 of the Ordinance of 14 February 2023
(BGBl. 2023 I No. 41).

Table of Contents

1.	Preamble	3
2.	Compensation governance	4
2.1.	Responsibilities for the remuneration systems	4
2.2.	Compensation Review Committee	4
2.3.	Compensation Officer	5
2.4.	Remuneration Advisory Board	5
3.	Remuneration systems	7
3.1.	Remuneration principles	7
3.2.	Overview of the remuneration systems	8
3.3.	Total Amount of variable remuneration	12
3.4.	Risk Taker identification	13
3.5.	Variable remuneration scheme	14
3.6.	Ex-post risk adjustment	17
3.7.	Prohibition of personal hedging strategies	18
4.	Information on remuneration	19
4.1.	Quantitative information on remuneration for all employees by business area	19
4.2.	Quantitative information on remuneration of Risk Takers	20

1. Preamble

Eurex Clearing AG (“ECAG” or “Company”), as a credit institution authorized in Germany, complies with strict regulatory requirements on remuneration. These stem primarily from Regulation (EU) No 2019/876 (“CRR II”), Directive EU No 2019/878 (“CRD V”), and the EBA/GL/2021/04 on sound remuneration policies.

While regulations like CRR II apply directly across the EU, directives and guidelines —such as CRD V — require national implementation. In Germany, this was achieved through updates to the Institutsvergütungsverordnung (“InstitutsVergV”) and the Kreditwesengesetz (“KWG”). Furthermore, ECAG implemented regulatory requirements on remuneration defined in Regulation (EU) No 648/2012 (“EMIR”) as well as Delegated Regulation (EU) No 153/2013 supplementing EMIR.

ECAG follows the requirements on remuneration for major institutions according to KWG and InstitutsVergV in conjunction with CRD V and CRR II for the financial year 2024. Further subsidiaries of ECAG are not to be considered in accordance with § 27 InstitutsVergV.

This 2024 Remuneration Report outlines both qualitative and quantitative details on ECAG’s remuneration practices for the financial year 2024, in line with Article 450 CRR II and §16 InstitutsVergV. It highlights policies for all employees, with a focus on those whose roles significantly impact the company’s risk profile (in the following referred to as “Risk Takers”¹), identified per Delegated Regulation (EU) No 2021/923 (“EBA-RTS”).

In 2024, no external consultant was mandated in the context of the design and implementation of the remuneration systems.

¹ The term “Risk Taker” refers to the Members of the Executive Board as well as to executive or non-executive employees identified as Risk Takers, unless stated otherwise.

2. Compensation governance

2.1. Responsibilities for the remuneration systems

The Supervisory Board of ECAG acts as responsible body to implement the remuneration policy for the Executive Board and is supported by the Compensation Review Committee (“CRC”, for further details see chapter 2.2).

The remuneration policy for employees below the Executive Board lies in the responsibility of the Executive Board.

The Compensation Officer supports the CRC as well as the Supervisory Board in assessing the appropriateness of the remuneration systems.

The Remuneration Advisory Board (“RAB”, for further details see chapter 2.4) ensures an appropriate involvement of the control functions and other relevant functions in the design and monitoring of the remuneration systems.

2.2. Compensation Review Committee

The CRC as subcommittee of the Supervisory Board acts as remuneration control committee in accordance with § 25d (12) KWG and § 15 InstitutsVergV.

The core task of the CRC is to supervise the reasonableness of the remuneration system for the members of the Executive Board of ECAG. It also reviews the appropriateness of the remuneration for the heads of the risk control and compliance functions, as well as for Risk Takers. Additionally, it supports the Supervisory Board in monitoring the overall remuneration system and evaluates its impact on risk, capital, and liquidity management.

The CRC consists of three members who are elected by the Supervisory Board. In 2024, Mr. Jeffrey Tessler (Chairman of the CRC), Mr. Clifford Lewis and Mr. Gregor Pottmeyer were members of the CRC.

In 2024, the CRC decided e.g. upon the total amount of variable remuneration for 2023, the individual variable remuneration 2023 for the members of the Executive Board and the remuneration packages as well as the individual targets for 2024 for the members of the Executive Board and reviewed the remuneration packages of the senior management in control functions. Further, the CRC reviewed the design and monitored the adequacy of the remuneration system and assessed it as appropriate. It acknowledged the Risk Taker analysis for the year 2024. In doing so, the CRC ensured that the remuneration systems are aligned with the business and risk strategy and monitored the appropriateness of the remuneration systems for the Executive Board and employee groups below. The CRC met two times during 2024.

2.3. Compensation Officer

Under regulatory remuneration governance, the Compensation Officer ensures the Company's remuneration systems are appropriately designed, long-term oriented, and effectively controlled, in line with §§ 23–26 InstitutsVergV. The Compensation Officer reports directly — both functionally and disciplinarily — to the Executive Board of ECAG, and functionally to the CRC.

Main activities performed in 2024:

- involvement in the continuous analysis of regulatory requirements and alignment regarding the necessary changes,
- involvement in the remuneration policy review, including the review of the respective plan documents,
- involvement in the process to identify Risk Takers,
- involvement in the preparation and conduction of the merit process,
- ongoing monitoring of the remuneration systems of employees below the Executive Board,
- ongoing monitoring of the hedging prohibition,
- preparation of the combined report according to § 12 InstitutsVergV and § 24 InstitutsVergV, and
- supporting the CRC in fulfilling its responsibilities in designing and monitoring the Executive Board remuneration (preparation of meetings of the Supervisory Board and the CRC).

2.4. Remuneration Advisory Board

The RAB is set up for the purpose to involve the control and corporate units in the design and development of the remuneration systems in accordance with regulatory requirements.

According to the rules of procedure, the RAB was involved in the design and development of the Company's remuneration systems covering the remuneration of all employees² and supports the Company's efforts to ensure compliance of its remuneration system with regulatory requirements and applicable law.

The members of the RAB include representatives of control units such as Internal Audit, Compliance, Risk Management and the Compensation Officer as well as representatives

²refers to non-executive, executive employees as well as the members of the Executive Board, irrespective if identified as Risk Taker or not, unless stated otherwise

of Human Relations, Finance and Legal to adequately involve these units in the design, development and oversight of the remuneration systems.

Regarding its tasks and in the context of its meeting in 2024, the RAB consulted about:

- the design and implementation of the remuneration system for 2024,
- the regulatory framework for remuneration systems for 2024.

3. Remuneration systems

3.1. Remuneration principles

The remuneration system for Executives and Risk Takers fosters a high-performance orientation as well as a share-based orientation to ensure a sustainable development and to comply with regulatory requirements.

The remuneration principles are set out in the ECAG remuneration policy, which is reviewed regularly and implemented by the Supervisory Board respectively Executive Board. Further fundamentals are included in the individuals' service respectively employment contracts, the variable remuneration schemes for Risk Takers, the applicable terms and conditions for the long-term sustainable instrument ("LSI" or "LSI shares") or the restricted stock units ("RSU" or "RSU Shares")³.

The remuneration policy is an important framework to ensure alignment with the business and risk strategy, including environmental, social and governance (ESG) targets, and is a central element for the implementation of the remuneration systems within the organization. It aims at:

- setting out the principles governing the remuneration systems for ECAG in the organizational guidelines,
- ensuring that the remuneration in the Company is in line with the applicable regulations on remuneration,
- informing employees on the applicable rules as well as on their remuneration system,
- describing the determination of the total amount of variable remuneration, and
- aligning the interests of the shareholders and employees, particularly for Risk Takers by using LSI and/or RSU, if applicable.

ECAG performed several activities to ensure that the remuneration policy and the remuneration principles are in line with the applicable regulations on remuneration (e. g., in 2024 the regular review of the remuneration policy).

Furthermore, and as a general rule, ECAG does not guarantee variable remuneration. In accordance with regulatory requirements, it may only be awarded in exceptional cases, is limited to new hires from outside the Company for a maximum period of one year and subject to appropriate equity and liquidity resources as well as sufficient capital to ensure its risk-bearing capacity.

³ LSI and RSU are both instruments with share-based character. After final conversion, a payout in cash applies. No real shares will be granted.

3.2. Overview of the remuneration systems

The remuneration for all employee groups consists of fixed and variable remuneration and is specified, in general and amongst others, in their service or employment contracts.

The fixed remuneration of non-executive employees under the collective agreement takes into account the utilized salary table. Non-executive employees may be granted variable remuneration in form of a cash bonus and they are evaluated through the performance & goals system.

The remuneration systems for the Risk Takers and non-Risk Taker Executives follow the guiding principles of the remuneration system of the Deutsche Börse AG Executive Board to ensure group-wide alignment.

Variable remuneration is measured in an additive bonus system considering three measurement levels in line with the business strategy: Deutsche Börse Group performance, Company (derived from the respective business segment) performance and individual goals:

- **Deutsche Börse Group Performance Measurement:**
 - Assessed based on Net Revenues & EBITDA (earnings before interest, taxes, depreciation, amortization and impairment losses) and ESG targets at the Deutsche Börse Group level.
 - This component contributes one third to the overall target achievement.
- **Company Performance (ECAG) Measurement:**
 - Measured by Net Revenues & EBITDA derived from the Eurex core segment.
 - This component contributes one third to the overall target achievement.
- **Individual Goals:**
 - Cover the individual level including the area of responsibility.
 - Include a mix of quantitative and qualitative goals.
 - This component contributes one third to the overall target achievement.

For executive employees in control units a control unit specific weighting of measurement levels applies.

For all executive employees, an individual target amount of Variable Remuneration ("Target Variable Remuneration") is set. The Target Variable Remuneration is multiplied with the overall target achievement, which is determined from the three measurement levels described above ("Indicative Bonus Amount"). The final bonus amount is subject to the decision of the respective decision-making bodies (for Risk Takers, an adjustment of +/- 20% of the Target Variable Remuneration may apply).

The allocation maximum is 200% of the Target Variable Remuneration. The shareholder meeting passed a resolution on the maximum variable remuneration of 200% of the annual fixed remuneration according to regulatory requirements (so-called Bonus Cap) regarding the provisions of § 25a (5) sentence 5 KWG which applies to all employees.

The payout of any variable remuneration is subject to a check for side conditions in institutions according to § 7 InstitutsVergV (i.e. Company/Group performance, capital planning, liquidity requirements, risk bearing capacity) and backtesting (for further details see chapter 3.6).

Executive employees who are not identified as Risk Takers can receive, under consideration of the target achievement, a "Performance Bonus" in cash and share-based variable remuneration in the form of a "Stock Bonus Plan".

The following applies specifically to Risk Takers and supplements the core principles for all executives. For Risk Takers in control units, the members of the Executive Board and the member of the Executive Board responsible for risk controlling, systemic differences apply as described in 3.2.1 and 3.2.2.

The target achievement on Company measurement level and of the individual goals are multiplied with a risk adjustment factor. This risk adjustment, reflecting the limits according to the respective risk strategy by Risk Management, is in general based on the ratio of Value at Risk relative to the Available Risk Bearing Capacity per risk type and considers a liquidity indicator.

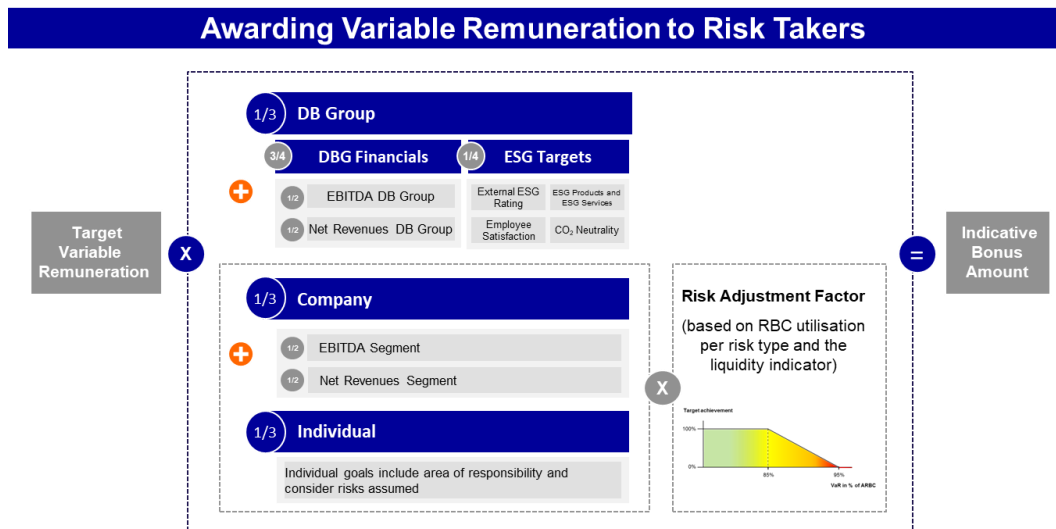
Risk Takers can receive a variable remuneration according to the conditions of the respective variable remuneration scheme for Risk Takers and depending on the Risk Taker category as well as the terms and conditions of the LSI respectively the terms and conditions of the LSI and RSU. The calculation of the individual variable remuneration incorporates the Target Variable Remuneration as well as the target achievement across the generally three measurement levels.

If the Supervisory Board, the Executive Board and/or the line manager of a Risk Taker decides in an overall assessment that the awarding of variable remuneration is not appropriate, there is no right to the award. Thereby, the Supervisory Board, the Executive Board and/or the line manager consider all circumstances leading to significant underperformance or negative performance contributions causing significant financial losses or damage to the reputation for the Company. This also applies in the event of individual unconscionable conduct or conduct in breach of duty as defined in the remuneration policy and the respective variable remuneration schemes.

Overall, the determination of Variable Remuneration considers especially current and future risks, corporate values and risk appetite as well as long-term interests in accordance with the Company’s risk strategy, which is derived from the business strategy on different levels:

Current risks are reflected on Company measurement level (derived from segment) and on individual measurement level by applying a Risk Adjustment Factor, which is based on the Company’s Risk Bearing Capacity utilization per risk type and the liquidity indicator reflecting the Company’s risk appetite and tolerance to the financial impact of risk and on individual measurement level by setting risk adjusted goals, which shall align the employee’s professional activities to the respective risk strategy (e.g. risk reporting, risk committee preparation, fire-drills).

Future risks are reflected on Company measurement level in the review of sustainability, which aims also to align the Total Amount to the Company’s prospective development and on individual measurement level by applying malus and clawback arrangements (where regulatory required).



Graphic 1: Exemplary process of awarding variable remuneration to Risk Takers. The Indicative Bonus Amount is subject to decision of the respective decision-making bodies.

Depending on the category of Risk Taker, 40% to 73% of the variable remuneration are deferred (the RSU generally for five, the LSI over a period of generally four to five years⁴, both paid out after an additional retention period of one year). The share-based components RSU and LSI link parts of the variable remuneration with a sustainable development. The deferral period is defined in accordance with the regulatory

⁴ For new Executive Board members a phase-in has been introduced, i.e. a deferral period of 7 years applies to the variable remuneration from the first year as Executive Board member, and a deferral period of 6 years applies to the variable remuneration from the second year as Executive Board member.

requirements, ECAG's business cycle as well as the nature and risk content of ECAG's business activities.

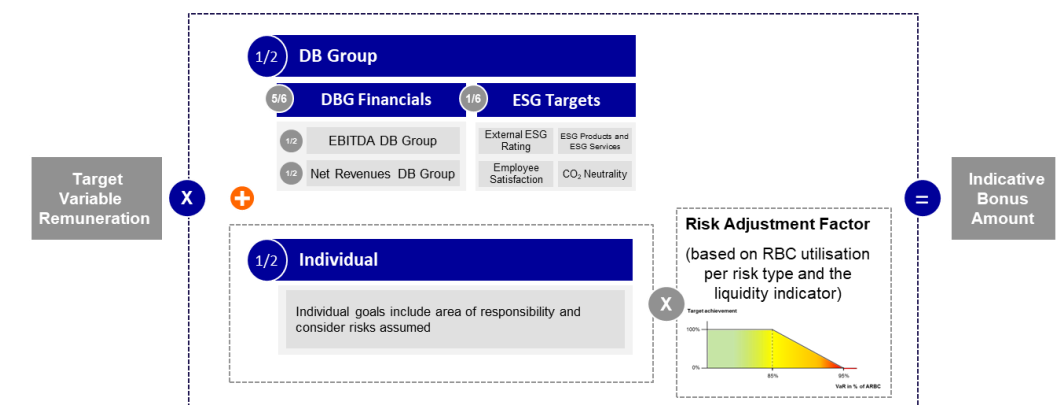
Overall, the remuneration systems do not incentivize taking disproportional high risks and are designed in a way that variable remuneration can be reduced to zero to comply with the regulatory requirements of § 45 KWG.

3.2.1. Risk Takers in Control Units

The individual goals for Risk Takers in control units shall be independent from the performance of the business area they monitor and should not compromise their independence or create potential conflicts of interest in their advisory role. To ensure that the remuneration parameters of Risk Takers in control units and the business units they control are not predominantly synchronized, only the measurement levels Deutsche Börse Group Performance (Net Revenues, EBITDA, ESG Targets) and individual goals are considered. Both measurement levels are equally weighted. Within the measurement level of Deutsche Börse Group, the equally weighted Net Revenues / EBITDA combined have a weighting of five out of six and the ESG Targets combined have a weighting of one out of six.

Specifically for Risk Takers in Control Units primarily control targets shall be set. The target achievement on Group measurement level and overall performance rating on individual level, multiplied with the respective risk adjustment factor, results in the Overall Target Achievement.

Awarding Variable Remuneration to Risk Takers in Control Units



Graphic 2: Exemplary process of awarding variable remuneration to Risk Takers in control units. The Indicative Bonus Amount is subject to decision of the respective decision-making bodies.

3.2.2. Risk Takers as members of the Executive Board and as members of the Executive Board responsible for Risk Controlling

The members of the Executive Board of ECAG are identified as Risk Takers. The award of variable remuneration follows the system set out in section 3.2, however goal setting and the assessment of goal achievement is performed by the Supervisory Board considering the recommendation of the Compensation Review Committee. For the members of the Executive Board an assessment of the performance in a multi-year measurement, based on annual targets, applies.

A phase-in approach for new members of the Executive Board is implemented in order to ensure that the reduced measurement period is balanced by an extended deferral period.

Regulations set special requirements on the remuneration system for the members of the Executive Board responsible for Risk Controlling: In order to ensure that the remuneration parameters of the member of the Executive Board responsible for Risk Controlling are not predominantly synchronized with those for the business units overseen, targets include Net Revenues / EBITDA as well as ESG Targets of Deutsche Börse Group and Net Revenues / EBITDA of the Company, each measurement level with a weighting of one quarter, as well as individual goals (including the area of responsibility) with a weighting of one half. Within the measurement level of Deutsche Börse Group, equally weighted Net Revenues / EBITDA combined have a weighting of two thirds and the ESG Targets combined have a weighting of one third. Within the measurement level of the respective Company, Net Revenues / EBITDA are equally weighted.

The individual goals for the member of the Executive Board responsible for Risk Controlling shall be independent from the performance of the business area they monitor and should neither compromise their independence nor create conflicts of interest in their control function role. Therefore, primarily control goals shall be set.

3.3. Total Amount of variable remuneration

The award of variable remuneration requires the Supervisory Board to jointly with the Executive Board resolve upon a sufficient Total Amount of variable remuneration (the "Total Amount") for the performance period, out of which among others the Risk Takers of the Company will be awarded.

For the financial year 2024, the Total Amount was determined in accordance with § 7 of the InstitutsVergV and Section 14 of the EBA Guidelines through a formalized and transparent process involving the control units.

A prerequisite for determining the Total Amount is that the company has not recorded a negative overall performance. Where this is accompanied by a significant decrease in the company's enterprise value, as a general rule, no Total Amount will be resolved upon.

Assessment of the requirements to determine the Total Amount		
		Assessment
Overall economic situation		
Overall company performance	Taking into account economic capital, economic profit, costs of liquidity and capital as well as the assumption of risk, the Company achieves a positive overall business performance.	✓/✗
Exceptional cases	The <i>Bundesanstalt für Finanzdienstleistungsaufsicht (or equivalent)</i> allows with respect to extraordinary circumstances, to resolve a Total Amount, regardless of the overall negative business performance.	If applicable
Requirements of the InstitutsVergV (additional national regulatory requirements may apply by analogy)		
section 7 (1)	The Total Amount was determined under adequate involvement of the control functions corresponding with their scope of tasks.	✓/✗
section 7 (1) 1	When determining the Total Amount, risk-bearing capacity, multi-year capital planning and profitability of the Group and/or Company are taken into account.	✓/✗
section 7 (1) 2 a), b)	The determination of the Total Amount does not limit the Group's and/or the Company's ability to maintain adequate funds and liquidity as well as the combined capital buffer requirements in accordance with section 10i KWG (or equivalent).	✓/✗
A total amount is resolved upon:		✓/✗

Graphic 3: Overview of the requirements to determine the Total Amount.

The Total Amount is determined by summing up the actual individual variable remuneration that shall be awarded to all employees of the Company whereas such summed up amount is subject to the examination of side conditions (refer to § 7 InstitutsVergV), e.g. on performance criteria derived from the Company's business and risk strategy in order to promote long-term sustainable success of the Company and to adequately reflect costs of capital and liquidity as well as risks incurred.

3.4. Risk Taker identification

According to § 25a (5b) KWG and the EBA-RTS, employees whose professional activities have a material impact on the Company's risk profile must be identified. For the financial year 2024, ECAG performed a risk analysis and identified Risk Takers based on the qualitative and quantitative criteria set out in EBA-RTS.

Pursuant to InstitutsVergV, members of the Supervisory Board were identified as Risk Takers in 2024. The identified members received only attendance fees, if any, but no remuneration which would be classified as fixed or variable remuneration in the sense of the Remuneration Ordinance for the respective Supervisory Board function.

In general, the Risk Takers of ECAG can be differentiated between Risk Takers as members of the Executive Board of ECAG, members of the Executive Board responsible for Risk Controlling, Risk Takers below the Executive Board (N-1 Risk Takers) and other Risk Takers differentiated if in a Control Unit or not. Employees within Deutsche Börse Group directly involved in providing services for ECAG for the purpose of conducting banking business or supplying financial services within the framework of an outsourcing agreement were identified as so-called Group Risk Takers (Group Risk Takers N-1 respectively Group Risk Takers other).

3.5. Variable remuneration scheme

For Risk Takers, the variable remuneration consists of an upfront and a deferred part. Depending on the classification of the respective Risk Taker category, the final bonus amount is split into different instruments, namely the cash bonus, the LSI Shares and the RSU shares (if applicable). Therefore, the respective payout schedules apply:

ECAG applied in accordance with InstitutsVergV the exemption limit for the payout of the complete variable remuneration. If a Risk Taker is granted variable remuneration of EUR 50,000 or higher or in case the Variable Remuneration is below EUR 50,000 but represents more than one third of the total annual Remuneration, a part of the variable remuneration will be deferred. At least 50% of the deferred and non-deferred parts of the variable remuneration shall be granted in share-based long-term instruments according to regulatory requirements. For eligible persons, with the LSI and the additional RSU, two third of variable remuneration will be awarded in form of share-based instruments.

The LSI links a part of the variable remuneration with a sustainable development. The Deferral Part (non-upfront part) of variable remuneration will be deferred for a period of four or five years and vested pro rata, also depending upon the Risk Taker classification. In every case, an additional retention period of one year applies for the LSI Shares.

The RSU shares will be deferred for five years. In addition, and in analogy to the LSI Shares, the RSU shares are subject to a retention period of one year. At the end of the retention period, the entire RSU part will be paid out (cliff vesting).

3.5.1. Payout process

Specific payout schedules with a cash and LSI bonus apply to all Risk Takers. Additionally, the RSU as a long-term component applies to members of the Executive Board as well as Risk Takers with the internal management level 6⁵. The award is subject to deferral if the exemption limit for Risk Takers does not apply.

For Risk Takers with management level 6 and Executive Board members (or equivalent), the final bonus amount is split into three components:

- One third will be awarded in cash.
- One third will be converted into LSI Shares per LSI terms, deferred over five years with pro-rata payout, and subject to an additional one-year retention period.
- One third will be converted into RSU Shares per RSU terms, deferred over five years, and subject to an additional one-year retention period. Afterwards, the entire RSU part will be granted (cliff vesting).

⁵ The internal management level for Executives incl. members of the Executive Board ranges to three levels with highest level 6 (below the Executive Board of Deutsche Börse AG). In case of split contracts and different Risk Taker classification, the stricter payout process shall prevail.

40% of the cash bonus and 40% of the LSI shares (“Upfront”) are granted upfront. 60% of the cash bonus and 60% of the LSI shares (“Deferral”) will be deferred as described before. Within the deferral period, the Deferral will be split into five equal annual installments. The LSI shares are subject to an additional retention period of one year.

For new members of the Executive Board the deferral period is extended, for further details see section 3.5.2.

For Risk Takers with internal management level 5* (reads: “five star”), 5 or non-executive Risk Takers the award is split into two components:

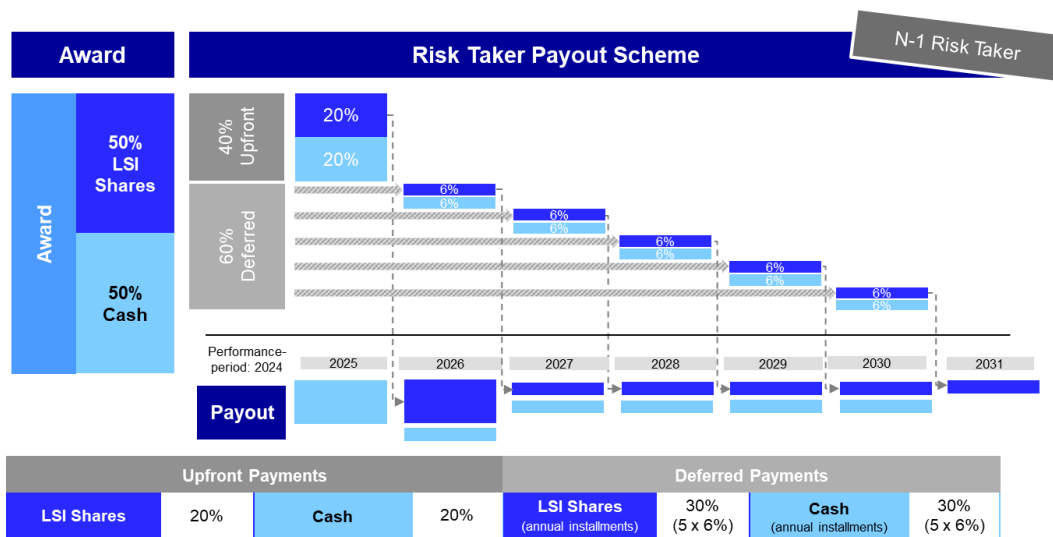
- 50% will be awarded in cash.
- 50% of the final bonus amount will be converted into long-term sustainable instruments in accordance with the respective terms and conditions of the LSI. The LSI shares are subject to an additional retention period of one year.

40% (namely N-1 (Group) Risk Takers) respectively 60% (namely for Other (Group) Risk Takers) will be granted as upfront part. 60% respectively 40% will be deferred over a period of five respectively four years. Within the deferral period, the Deferral will be split into five respectively four equal annual installments. The LSI shares are subject to an additional retention period of one year. For Risk Taker categories with a less strict payout scheme than for the N-1 Risk Takers, the N-1 Risk Taker scheme is applied in case of an award of Variable Remuneration above the Internal Threshold in accordance with § 20 (3) InstitutsVergV.

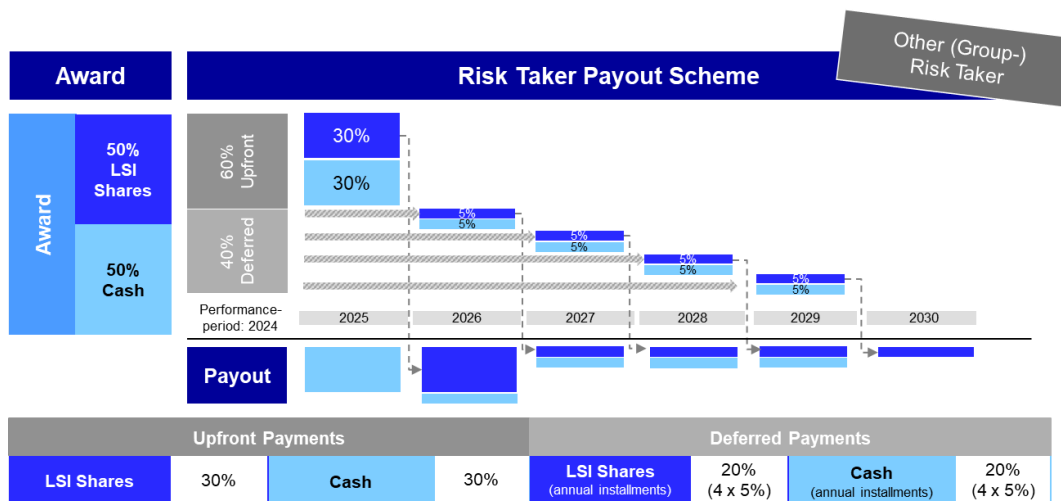
Until the final decision regarding the payout of the final bonus amount (“Granting”), there is no right to the deferred or to the non-deferred parts of the final bonus amount which have already been converted into LSI shares or RSU shares. During the deferral period and retention period, there is only a right to an accurate determination of the expected (unpaid) portion of the variable remuneration. Portions of the variable remuneration which are due to be paid out but are not effectively paid out or are not converted into LSI shares or RSU shares forfeit and are not carried forward into future years. For the avoidance of doubt fixed remuneration shall not be subject to Deferral or retention periods.

3.5.2. Payout schedules for Risk Takers (different categories)⁶

The graphics below show the payout schedules for each category of Risk Takers. The respective components within the Group Risk Taker category, namely the cash part and the LSI part, may vary with regard to the payout as displayed below.

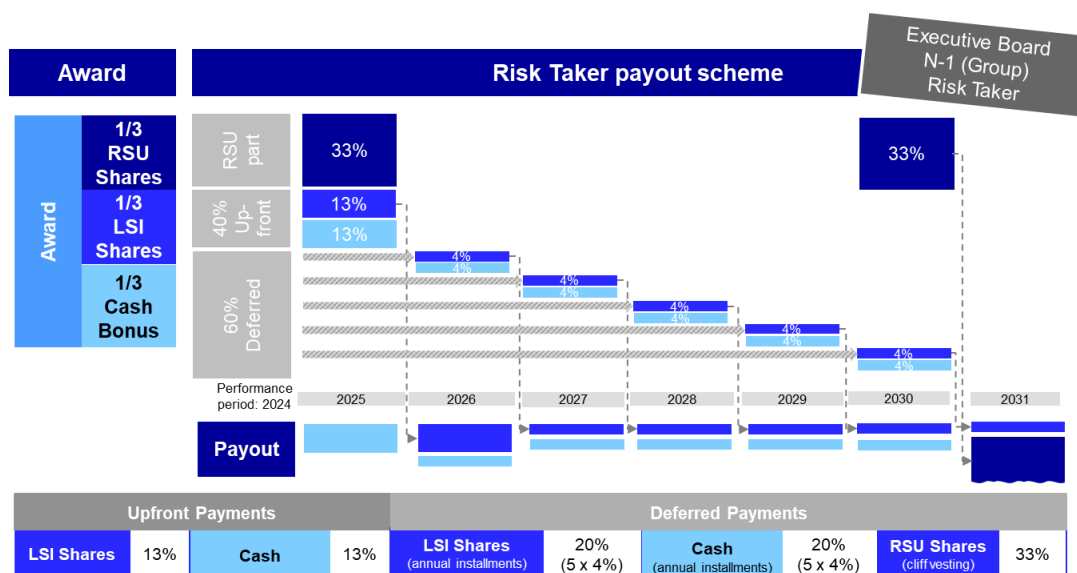


Graphic 4: Exemplary payout of the variable remuneration (N-1 Risk Taker) without RSU.

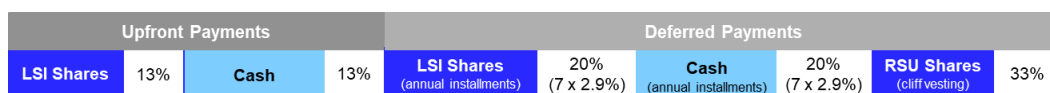


Graphic 5: Exemplary payout of the variable remuneration (Other (Group) Risk Taker below Internal Threshold).

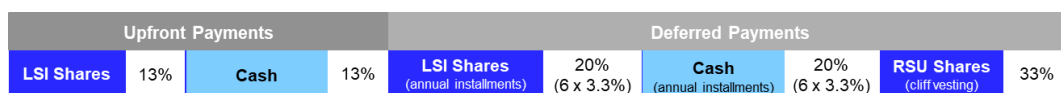
⁶ For reasons of readability, the percentages in this document are rounded and amount to 100% in each respective case.



Graphic 6: Exemplary payout of the variable remuneration for Risk Taker (members of the Executive Board, N-1 (Group) Risk Taker with internal management level 6) with the RSU.
For clarification: The 60% deferred and 40% upfront part refer to LSI Shares and cash Bonus part as base only.



Graphic 7: Overview of the payout scheme for new members in the management body in the first year.



Graphic 8: Overview of the payout scheme for new members in the management body in the second year.

3.6. Ex-post risk adjustment

Prior to the payment, within a comprehensive review, it is decided by taking into account the requirements of the InstitutsVergV if or to what extent the variable remuneration under review will be paid out or converted into LSI shares respectively RSU shares.

Therefore, the sustainability of the performance contributions of each Risk Taker, of their area of responsibility as well as the Overall Performance of the Company will be considered. Moreover, the financial situation of the Company, in particular significant changes in the capital base, decreases in the financial capacity and the risk-bearing capacity will be taken into account (backtesting).

In case of a negative backtest, malus can apply to all elements: the cash portion as well as the LSI respectively the RSU portion of deferred remuneration, in particular in case of evidence of misbehavior or serious error (e.g. breach of code of conduct and other internal rules, especially concerning risks), negative performance contributions, significant failure of risk management respectively significant changes in the capital base, or significant downturn in the financial performance. In case of the circumstances described above have

occurred to a significant degree, a reduction or forfeiture of portions of the deferred variable remuneration including LSI respectively RSU shares applies.

The regulations on adjustment of variable remuneration are complemented through the implementation of repayment obligations for Risk Takers in accordance with regulatory requirements (so-called "Clawback"). Thus, the specific requirements of the InstitutsVergV, the FAQ to the InstitutsVergV⁷ and the EBA-Guidelines are taken into consideration. In case of a significant involvement in or the responsibility for a behavior which led to a significant loss for the Company or to a major regulatory sanction, or a severe breach of relevant external or internal regulations concerning standards of suitability and conduct has been carried out, the respective Risk Taker is obliged to repay any variable remuneration already paid out respectively any claim to payment of variable remuneration shall lapse.

For 2024, a malus and clawback assessment was performed by the respective line manager as well as by the Main Malus/Clawback Meeting which includes representatives of Human Relations, Internal Audit, Compliance, Risk Management and the Compensation Officer. Within this comprehensive review, potential cases which could lead to a reduction or forfeiture of bonus payments respectively deferred remuneration tranches (incl. clawback of already paid tranches) are assessed. The assessment results in a recommendation regarding a potential further treatment of critical cases. A final decision upon consequences lies in the responsibility of the Executive Board respectively the Supervisory Board. The malus and clawback assessment performed for members of the Executive Board and Risk Takers of ECAG was reflected in the determination of variable remuneration for 2024 and for deferred tranches from previous financial year(s). The payout of variable remuneration for 2024 and of deferred tranches from previous financial year(s) was assessed as being in line with the regulatory requirements.

3.7. Prohibition of personal hedging strategies

The effectiveness of risk alignment would be significantly weakened if employees were able to transfer the downside risks to another party through hedging or certain types of insurance. To ensure the effectiveness of risk alignment, the remuneration policy and remuneration principles prohibit employees to undertake any personal hedging strategies or other countermeasures that confine or neutralize the risk alignment effects of their remuneration. Also, appropriate compliance structures and measures in order to prevent any hedging strategies are implemented, including screening of securities accounts by Compliance and reporting in case of violations by the Compensation Officer. Through this, employees subject to the internal rules including members of the Executive Board agreed to allow inspections of their securities accounts and to declare if and which personal hedging strategies or other countermeasures they utilized.

⁷ "Fragen und Antworten zur Institutsvergütungsverordnung - FAQ zur Verordnung über die aufsichtsrechtlichen Anforderungen an Vergütungssysteme von Instituten vom 16.12.2013 in der am 14.02.2023 in Kraft getretenen Fassung", dating June 2024

4. Information on remuneration

The disclosure of remuneration data pursuant to Section 16 InstitutsVergV in conjunction with Article 450 of Regulation (EU) No 575/2013 is displayed in the following tables according to the relevant templates and regulatory requirements⁸.

4.1. Quantitative information on remuneration for all employees by business area

According to § 16 InstitutsVergV, aggregate quantitative information on remuneration for all employees of ECAG is broken down by business area:

Amounts in Mio. EUR	MB Supervisory function	MB Management function	Corporate functions	Independent control functions	All other staff	Total
Number of members (Headcount)	12	5				
Total number of staff (in FTE)			104	65	224	393
Total remuneration	0.32	4.8	18.78	8.41	24.01	56.32
Of which: variable remuneration	-	2.39	4.87	1.38	3.73	12.37
Of which: fixed remuneration	0.32	2.41	13.91	7.03	20.28	43.95

⁸ Supplementary information to the above tables: In order to maintain confidentiality and for data protection reasons, data are shown on an aggregated and rounded basis (deviations may occur due to rounding). Supervisory Board members are stated as Headcount. As of 31 December 2024, for the Supervisory Board of ECAG there are in total 12 mandates. Members of the Supervisory Board only receive attendance fees in their function on the Supervisory Board. The total amount of attendance fees in 2024 is EUR 0.32 million. The remuneration information for employees and Risk Takers (including Group Risk Takers) which are no Supervisory Board members is disclosed in EUR (foreign currencies are converted into EUR) and includes remuneration awarded for the respective service period for the financial year 2024.

4.2. Quantitative information on remuneration of Risk Takers

In addition to the requirements of § 16 InstitutsVergV, Art. 450 CRR II requires detailed information on the remuneration for Risk Takers (“identified staff”). The corresponding templates pursuant to Art. 17 of the Implementing Regulation (EU) 2021/637 which defines the regulatory requirements for disclosure in accordance with Annex XXXIII are shown below:⁹

Template EU REM1 - Remuneration awarded for the financial year

Amounts in million EUR		MB Supervisory function ¹⁰	MB Management function ¹⁰	Other senior management	Other identified staff	
1	Fixed remuneration	Number of identified staff (FTE)	12	5	-	45
2		Total fixed remuneration	0.32	2.41	-	10.62
3		Of which: cash-based	0.32	2.23	-	9.97
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	-	0.18	-	0.65
8	(Not applicable in the EU)	-	-	-	-	
9	Variable remuneration	Number of identified staff (FTE)	12	5	-	45
10		Total variable remuneration	-	2.39	-	5.28
11		Of which: cash-based	-	0.8	-	2.64
12		Of which: deferred	-	0.48	-	1.01
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	-	1.59	-	2.64
EU-14b		Of which: deferred	-	1.27	-	1.92
EU-14x		Of which: other instruments	-	-	-	-
EU-14y		Of which: deferred	-	-	-	-
15	Of which: other forms	-	-	-	-	
16	Of which: deferred	-	-	-	-	
17	Total remuneration (2 + 10)		0.32	4.8	-	15.9

⁹ “Senior management” within the meaning of Article 3(1)(9) CRD corresponds here to the MB Management function.

¹⁰ Supervisory and Executive Board members are stated as Headcount.

Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

Amounts in Mio. EUR		MB Supervisory function	MB Management function	Other senior management	Other identified staff	Total
Guaranteed variable remuneration awards						
1	Guaranteed variable remuneration awards - Number of identified staff	-	-	-	-	-
2	Guaranteed variable remuneration awards - Total amount	-	-	-	-	-
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-	-
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	-	-	-	-	-
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	-	-	-	-
Severance payments awarded during the financial year						
6	Severance payments awarded during the financial year - Number of identified staff	-	-	-	-	-
7	Severance payments awarded during the financial year - Total amount	-	-	-	-	-
8	Of which paid during the financial year	-	-	-	-	-
9	Of which deferred	-	-	-	-	-
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-	-
11	Of which highest payment that has been awarded to a single person	-	-	-	-	-

Template EU REM3 - Deferred remuneration

Amounts in Mio. EUR		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 future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (due to the changes of share prices)	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
1	MB Supervisory function	-	-	-	-	-	-	-	-
2	Cash-based	-	-	-	-	-	-	-	-
3	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
4	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
5	Other instruments	-	-	-	-	-	-	-	-
6	Other forms	-	-	-	-	-	-	-	-
7	MB Management function	7.32	1.93	5.39	-	-	0.16	1.35	0.64
8	Cash-based	1.8	0.64	1.15	-	-	-	0.64	-
9	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
10	Share-linked instruments or equivalent non-cash instruments	5.52	1.29	4.24	-	-	0.16	0.71	0.64
11	Other instruments	-	-	-	-	-	-	-	-
12	Other forms	-	-	-	-	-	-	-	-
13	Other senior management	-	-	-	-	-	-	-	-
14	Cash-based	-	-	-	-	-	-	-	-
15	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
16	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
17	Other instruments	-	-	-	-	-	-	-	-
18	Other forms	-	-	-	-	-	-	-	-
19	Other identified staff	7.15	2.18	4.98	-	-	0.15	1.85	1.04
20	Cash-based	2.85	1.04	1.81	-	-	-	1.04	-
21	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
22	Share-linked instruments or equivalent non-cash instruments	4.3	1.14	3.17	-	-	0.15	0.81	1.04
23	Other instruments	-	-	-	-	-	-	-	-
24	Other forms	-	-	-	-	-	-	-	-
25	Total amount	14.47	4.11	10.37	-	-	0.31	3.2	1.68

Template EU REM4 - Remuneration of 1 million EUR or more per year

	EUR	Identified staff that are high earners as set out in Article 450(i) CRR ¹¹
1	1 000 000 to below 1 500 000	-
2	1 500 000 to below 2 000 000	-
3	2 000 000 to below 2 500 000	-
4	2 500 000 to below 3 000 000	1
5	3 000 000 to below 3 500 000	-
6	3 500 000 to below 4 000 000	-
7	4 000 000 to below 4 500 000	-
8	4 500 000 to below 5 000 000	-
9	5 000 000 to below 6 000 000	-
10	6 000 000 to below 7 000 000	-
11	7 000 000 to below 8 000 000	-

Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

Amounts in million EUR		Management body remuneration			Business areas						Total
		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	
1	Total number of identified staff										64
2	Of which: members of the MB	12	5	17							
3	Of which: other senior management				-	-	-	-	-		
4	Of which: other identified staff				-	-	-	22	13	12	
5	Total remuneration of identified staff	0.32	4.8	5.12	-	-	-	9.85	3.12	2.93	
6	Of which: variable remuneration	-	2.39	2.39	-	-	-	3.72	0.71	0.85	
7	Of which: fixed remuneration	0.32	2.41	2.73	-	-	-	6.13	2.41	2.08	

¹¹ In case of split contracts, remuneration data reported in accordance with the legal entity employment contracts.