

## **2025 Report Remuneration Policy and Practice regarding Identified Staff of FMO**

FMO is reporting on an annual basis about the remuneration policy and practice regarding the Identified Staff of FMO. Identified Staff are individuals who could have significant impact on FMO's risk profile. The European Banking Authority (EBA) issued criteria for determining which employees should be designated as Identified Staff. Based on these guidelines, Identified Staff comprise not only members of the Supervisory Board, Management Board members and Directors, but also senior managers responsible for the independent risk management function, the compliance function or the internal audit function of a bank.

Apart from the members of the Supervisory Board and Management Board, a group of 28 employees of FMO (December 31, 2025) all with a (senior) management responsibility, are designated as 'Identified Staff' in accordance with the Regulations on Sound Remuneration (Wft 2021, RBB 2021) in which the Dutch Central Bank and AFM have implemented the CRD V regulations with respect to sound remuneration policies for Dutch bank staff.

Three members of the Identified Staff are involved in the management of FMO Investment Management B.V. (FIM), a fully owned subsidiary of FMO and therefore they are incorporated in this report.

This report addresses the following:

1. the governance regarding the remuneration policy and practice related to the Identified Staff,
2. the guidelines of the remuneration policy for Identified Staff and
3. the remuneration practice in 2025 with regard to the Identified Staff.

### **1. Governance with respect to Remuneration Policy**

*The mandate and composition of the Selection Appointment and Remuneration Committee (SARC)*

The SARC advises the Supervisory Board on its decision-making in relation to the composition and appointment and re-appointment to, the Supervisory Board and the Management Board of FMO. As part of talent management, the SARC also addresses the subject of staff diversity (age, gender and cultural background) in management positions as well as with respect to the entire staff population. FMO operates a prudent, controlled and sustainable remuneration policy that is in line with its mission and corporate values, strategy, risk appetite and its objectives and with applicable regulations.

Furthermore, the SARC helps the Supervisory Board to prepare for its decision-making in relation to the remuneration of the members of the Management Board, and keeps oversight on the consistency, guidelines and policies regarding the staff remuneration in general. The committee also reviews on a regular basis (normally once every three years) remuneration policies pursued in the external market and advises the Supervisory Board on how to apply the guidelines for remuneration policy in the banking sector.

The General Meeting of shareholders (GM) will approve the remuneration policy of the Management Board and the Supervisory Board and its adjustments. The Supervisory Board is responsible for the implementation on this policy and for the approval of the general remuneration guidelines of FMO and the remuneration policy regarding the Identified staff members.

The Supervisory Board will report annually in the Annual Report about the remuneration policies regarding the Management Board and Identified Staff and about the remuneration practice.

More information about the responsibility of the SARC can be found on the website of FMO ([www.FMO.nl](http://www.FMO.nl) Governance & Policies/ Supervisory Board/ Standing rules of the SARC).

In 2025, the SARC consisted of the following members:

- R.P.F. (Reintje) van Haeringen (Chair);

- M. (Marjolein) Demmers (member);
- D.J. (Dirk Jan) van den Berg (member, until 23 April 2025);
- R.J. (Rob) Becker (member as from 23 April 2025).

### *Meetings SARC in 2025*

The Supervisory Board appoints Management Board members, approves annual corporate targets as well as the annual (cost) budgets, and evaluates the performance of the Management Board as a whole, as well as the performance of the individual members. A proactive role was played by the SARC. In 2025, the SARC had two formal meetings and deliberated several times on an ad-hoc basis. It discussed, among others, the search for a new ARC Chair, a new CFOO, and a new Co-CIO. Furthermore, the reappointment of the Chief Risk Officer was prepared by the SARC and the SARC addressed remuneration topics (e.g. pensions) and human resources topics, such as the 'quality of interaction'. Finally, the SARC prepared an update of 'the SARC Standing Rules', which were approved by the Supervisory Board in December 2025.

## **2. Remuneration Policy Identified Staff**

### *General Remuneration principles FMO (identified) staff*

The remuneration policy is designed to promote fair and consistent employee compensation, based on performance and an efficient job position classification system. The annual individual goals of members of the Identified Staff are related to FMO's long-term strategic goals and balanced with respect to contributing to creating impact and growth in FMO's markets. Identified Staff members will not receive any variable compensation in the form of bonuses or profit sharing.

All employees working within FMO, including Identified Staff members, are subject to the scope of the Collective Labour Agreement Banks (CLA Banks) and the compensation and benefits package as stated in the Personnel Guide of FMO. The remuneration structure implies a maximum salary for each position in the organization.

The annual performance management system is based on (individual and team) target setting related to the appropriate objectives that both put the interest of clients first and help ensure the long-term continuity and financial strength of FMO. Setting targets, measuring results and evaluating performance is part of this annual performance management cycle. The individual performance is evaluated and will result in the (potential) salary adjustment up to the maximum salary applicable to the position.

External benchmark surveys are regularly used to compare the level of remuneration with the relevant market. FMO aims to set its total remuneration around the median (what is the middle value of the selection) paid in the Dutch financial service industry, which is seen as the relevant market for comparable work. The job levels of all (Identified Staff) staff members are in part of these remuneration benchmark surveys.

The remuneration policy is in line with FMO's business strategy, our core values and the desired risk profile of FMO and it discourages (identified) staff members from taking non-desirable risks, nor does it reward failure or misconduct. At the same time, it allows FMO to attract and retain qualified staff, while encouraging employees to aim for long-term results that serve the long-term interest of our clients and the mission of FMO.

### *Remuneration Principles Management Board*

FMO's remuneration policies are aligned with the requirements under external legislation and regulations, including the Dutch Banking Code, the Dutch Rbb/Wft 2021 regulations, and the guidelines of the Capital Requirements Directives (CRD V).

The Annual General Meeting of Shareholders established the remuneration policy for members of the Management Board. With respect to the fixed remuneration of the CEO the remuneration policy indicates a maximum salary level. Also, the maximum salary levels of the other members of the Management Board are related to this maximum. These maxima will be adjusted in alignment with salary adjustment in the Collective Labour Agreement (CLA Banks).

Existing agreements in favor of the employee that were already agreed upon prior to the appointment, will continue to be honored in the future.

At the AGM 2025 (April 23, 2025), no changes to the remuneration policy were proposed or approved.

In alignment with the CLA Banks, the maximum annual salary for the CEO increased by 4 percent to € 339,604 gross per January 1, 2025 (January 1, 2024 € 326,542). As per July 1, 2025 another increase by one percent applied, leading to a gross annual salary of € 343,001.

Members of the Management Board are not entitled to any form of variable remuneration.

Other elements of the remuneration consist of a pension scheme (based on a defined contribution and a retirement target age of 68 years, as of January 1, 2022), the same scheme applicable to all staff members of FMO. Furthermore, the option to make use of a NS Business card (for the use of public transport for commute, business- and private-travel in the Netherlands) or a fixed monthly mobility allowance, as well as a fixed monthly expense allowance to cover costs relating to the performance of their duties.

Employees already employed by FMO in 2016, continue - if applicable - to benefit from an existing fixed individual allowance for retirement (compensation as effect of changes in the Dutch tax framework regarding pension regulations as from 2016) and/or - if applicable - a reimbursement of a proportion of any paid mortgage interest in the respective calendar year.

Members of the Management Board will be appointed for a period of 4 years and can be re-appointed for the same period in the same role. Thereafter - only in exceptional situations - two additional two-year terms in the same role may apply. Also, the appointment as CEO is possible after two terms in another MB role.

Welcome, retention and exit arrangements (if applicable) are reviewed by the SARC and in alignment with the approved remuneration policy and will not be excessive. Furthermore, FMO complies with all existing laws and regulations concerning the level of severance payments (maximum of one annual salary).

Since 2022 the Management Board has consisted of a Chief Executive Officer (CEO), two Co-Chief Investment Officers (CCIO), a Chief Risk Officer (CRO) and a Chief Finance and Operations Officer (CFOO).

### **Remuneration Practice Identified Staff in 2025**

The total base salary in 2025 of the Management Board of FMO amounts €1,138,000. The costs for the total pension accrual - up to a fixed annual salary of € 137,800 and the indexation of accrued pension entitlements, amounted € 170,000 in total. In total € 97,000 has been paid to Management Board members regarding other benefits (contribution to company car/mobility allowance, fixed expense allowance, all in alignment with the general fringe benefits within FMO).

Based on the CLA Banks, structural salary adjustments of 4% by January 1, 2025 and 1% by July 1, 2025 have been granted to the members of the Management Board and other (Identified) staff members of FMO. More details on the individual remuneration of the members of the Management Board over 2025 can be found in the Annual Report of FMO 2025.

Members of the Identified Staff are not eligible to receive any variable remuneration (bonuses). Members of the Supervisory Board and the Management Board and other members of the Identified staff have no shares, options or loans related to the company.

<b>2025</b> (x 1,000 €)	<b>Fixed income</b>	<b>Pension</b>	<b>Other<sup>2</sup></b>	<b>Total</b>
Supervisory Board (6) <sup>1</sup>	157	-	-	157
Management Board (3) <sup>1</sup>	1,138	170	97	1,405
Other Identified Staff (28) <sup>1</sup>	5,209	1,218	317	6,744
<b>In total</b>	<b>6,504</b>	<b>1,388</b>	<b>414</b>	<b>8,306</b>

<sup>1</sup> Number of persons as per 31 December 2025 (staff changes during 2025 are included pro rata). By the end of 2025, the Management Board consisted of three members, the group 'other identified staff' has increased from 25 to 28 members.

<sup>2</sup> This relates to fixed reimbursements of expenses, contributions to a company car/ mobility allowance, compensations of interest on mortgages (only applicable for employees already in service of FMO on 31 December 2016).

<b>2024</b> (x 1,000 €)	<b>Fixed income</b>	<b>Pension</b>	<b>Other<sup>2</sup></b>	<b>Total</b>
Supervisory Board (6) <sup>1</sup>	140	-	-	140
Management Board (5) <sup>1</sup>	1,439	192	53	1,684
Other Identified Staff (25) <sup>1</sup>	4,800	738	319	5,859
<b>In total</b>	<b>6,379</b>	<b>927</b>	<b>372</b>	<b>7,678</b>

<sup>1</sup> Number of persons as per 31 December 2024 (staff changes during 2024 are included pro rata). By 2024, the Supervisory Board has grown from five to six members, the group 'other identified staff' has decreased from 29 to 25 members.

<sup>2</sup> This relates to fixed reimbursements of expenses, contributions to a company car/ mobility allowance, compensations of interest on mortgages (only applicable for employees already in service of FMO on 31 December 2016).