Information on accessibility

Identity of the company

Scalable Capital Bank GmbH (**"Scalable Capital"**)
Seitzstraße 8e
80538 Munich
Germany
Telephone number: +49 (0) 8938038067

Description of our services

With Scalable Capital's services, you can invest money on the financial market, i.e. buy and sell shares, funds or other securities.

The various offers from Scalable Capital are:

- **Cash accounts:** We keep your money for you on cash accounts with Scalable Capital. For some cash accounts, you will receive interest on your money, for example for Overnight accounts.
- **Broker:** You can use the Broker to buy and sell securities such as shares, ETFs and funds yourself. There are 2 different price models to choose from: With the FREE Broker you pay per buy/sell, with the PRIME+ Broker you pay a monthly fixed price and can buy and sell unlimited number of orders from 250 euros. You can also set up savings plans, whereby a certain amount of money is automatically invested in a security at regular intervals.
- **Wealth:** Scalable Capital takes care of buying and selling ETFs for you: You answer a few questions about your financial situation and select an investment strategy. Scalable Capital uses this information as a basis to then invest for you on the financial market.
- **Credit:** You can borrow money from Scalable Capital through Credit. You can either use it to buy securities or have the money paid out. The amount you can borrow depends on which and how many securities you own with Scalable Capital.

Information on utilisation

You can use Scalable Capital's services either via a web browser or via our mobile apps for iPhones and Android smartphones. To do this, you must first create a user account, answer a few questions and then confirm your identity. You can then log in with your email address and password.

Cash accounts

We manage one or more cash accounts for you, into which you can deposit and withdraw money. For some cash accounts, you will receive interest on your money, for example for Overnight accounts.

Broker

You buy and sell in the Broker yourself. To do this, you must first deposit money with Scalable Capital. Use the search function to find securities or take a look at our lists of securities on specific topics. You can also save securities for

later. If you want to be notified when the price of a security changes, create a price alert. When buying or selling a security, you must specify how many shares you wish to trade. All your purchases and sales are visible in a list. To understand how the value of your securities has changed since you bought them, we offer several functions for analysing them.

Wealth

In Wealth, Scalable Capital buys and sells ETFs for you. You must first deposit money with Scalable, then Scalable Capital will automatically start trading according to your chosen investment strategy. All purchases and sales that Scalable Capital carries out for you are visible in a list. To understand how the value of the securities has developed or which securities have been bought and sold since the beginning, you can use several graphical representations.

Credit

With Credit, you can pay out more money from your Scalable Capital account than is actually in the account. However, this money is only borrowed and you have to pay it back. Fees apply as long as you have borrowed money. In order to use Credit, you must hold securities in the Broker. Depending on which and how many securities you own, you can borrow more or less money.

Legal requirements

The information on accessibility described here relates to

- the publicly available website https://scalable.capital/
- the area of the website available with a user account ("Web Cockpit")
- the app for iPhones
- the app for Android smartphones

The accessibility requirements for us result from the German Accessibility Improvement Act (*Barrierefreiheitsstärkungsgesetz - BFSG*) and the German Regulation to the Accessibility Improvement Act (*Verordnung zum Barrierefreiheitsstärkungsgesetz - BFSGV*), derived from the European Accessibility Act (EAA). These laws and regulations refer to the Harmonised European Standard (EN) 301 549, version 3.2.1, based on the Web Content Accessibility Guidelines (WCAG), Version 2.1, Levels A and AA.

Degree of compliance

Scalable Capital's website and mobile apps partially fulfil the legal requirements of WCAG 2.1 (Level AA) and the technical requirements formulated in the German Regulation to the Accessibility Improvement Act.

When implementing the legal requirements, the first step is to focus on addressing the following aspects, as restrictions in these areas are the most widespread. Improvements in accessibility in this respect therefore benefit the greatest possible number of people affected.

- Keyboard Operability:
    - You can navigate to all functions using the keyboard.
    - You can navigate away from all functions using the keyboard.
    - The order in which functions are focused using the keypad is logical and intuitive.
    - Focusing a function does not trigger the function.
    - Focused elements are clearly highlighted.
    - Focused elements are not covered, but are at least partially visible.
    - Repeated elements can be skipped.

- Screen reader Optimisation:
    - Pages have a unique title.
    - Headings clearly describe the associated content.
    - Non-text elements have text alternatives.
    - Graphic elements do not contain any content that is invisible to screen readers.
    - Texts of buttons and links clearly convey their purpose.
    - Screen readers read content in the same order as users would.
    - There is additional information on elements that screen readers pick up.
    - Repeated elements are placed in the same relative order each time they appear in the Accessibility Tree.
    - ARIA landmarks are used to identify areas of a page.
- Document optimisation:
    - Metadata and language are set correctly.
    - Text can be selected and copied.
    - Non-text elements have text alternatives.
    - Elements can be recognised by screen readers and read out in the correct order.
    - Tooltips are available where necessary.

So-called "linting" rules have been implemented to ensure that the above points are implemented: If certain guidelines and best practices relevant to accessibility are not observed during development, the relevant stakeholders are notified and further development at a technical level is prevented. Development can only be continued once the errors have been rectified.

The points listed were taken into account in the following areas of the service:

- Public website: In the cookie modal, the footer, the document overview, the registration and the login.
- Web Cockpit: On the overview page of the Broker portfolio, in the securities search, on the security details page, the securities trading process and the process for deposits and withdrawals for Broker clients.
- Mobile Apps: In the securities search and the "Discover Securities" screen.
- Documents: SEPA mandate issuance and contract notes for Broker clients.
- Emails: Confirmation of registration.

Outlook

We are working at full speed to make the other aspects of our service accessible. Special focus is placed on the most frequently used screens (especially the apps) and documents. For newly developed features, the points described above are already taken into account. Our public website is soon to be completely redesigned and will then also meet the legal requirements. We hope that these measures will enable all people, regardless of their individual abilities, to use our services without barriers.

Date and method

Tests were carried out using, among others, the Chrome browser, tools such as Axe, Lighthouse and WAVE and the VoiceOver screen reader. The basis was the current Web Cockpit, iPhone app and Android app versions at the time of creation.

This document will be updated in the event of significant changes to the service or significant progress in accessibility, most recently in July 2026.

Costs and associated charges of our services

Information on the individual costs can be found in our List of Prices and Services. The client can access the respective current List of Prices and Services on the website and via the mobile apps of Scalable Capital. Upon request, Scalable

Capital will send the client a current List of Prices and Services by email. To the extent required by law, Scalable Capital will also provide the client with an annual statement containing cost information which reflects the actual costs incurred during the reporting period.

Contractual terms of our services

The General Terms and Conditions apply to all services. The Special Terms and Conditions apply additionally to individual services.

Contract term, termination conditions and right of withdrawal

1. The services offered are not subject to a minimum term.
2. Unless otherwise stated in the contractual terms between Scalable Capital and the client, the client may terminate the entire business relationship or individual business relationships at any time without observing a notice period, and Scalable Capital by giving two (2) months' notice. The right of both parties to extraordinary termination remains unaffected. Notice of termination must be given in text form by both parties. The client may also give notice of termination in the client area. No contractual penalties will be incurred in the event of termination.
   When entering into the contract, the client has a right of withdrawal, in respect of which Scalable Capital provides information in the Notice of the Right of Withdrawal of the Client Documentation.
   If a client withdraws from the Broker models PRIME+ Broker or PRIME Broker, the client is obligated to pay compensation for executed trade orders in the amount of the fees applicable to the Broker model FREE Broker in accordance with the List of Prices and Services.
   If a client withdraws from the credit agreement for securities-based credit, the client must pay the agreed debit interest for the period between disbursement and repayment of the securities-based credit.

Feedback and complaints

We look forward to your feedback on the accessibility of our service.

Scalable Capital has also established a complaints management function that is responsible for investigating complaints. This is the Compliance Department. The client can reach it as follows:

Scalable Capital Bank GmbH
Compliance Department
Seitzstr. 8e, 80538 Munich, Germany
Email: complaint@scalable.capital

Market surveillance authority

Until the Market Surveillance Authority of the Federal States for the Accessibility of Products and Services (*Marktüberwachungsstelle der Länder für die Barrierefreiheit von Produkten und Dienstleistungen - MLBF*) is formally established, please address your questions to:

MLBF (in Errichtung)
c/o Ministerium für Arbeit, Soziales, Gesundheit und Gleichstellung Sachsen-Anhalt

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39135 Magdeburg

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