ENVIRONMENTAL POLICY

INSTITUTO DE CRÉDITO OFICIAL
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Environmental Policy

I. INTRODUCTION
ICO is a corporate State-owned entity whose purpose is sustaining and promoting economic activities that contribute to growth and to improving the distribution of national wealth and, in particular, promoting those activities that merit promotion because of their social, cultural, innovative or ecological importance. ICO undertakes its mission through a double line of action. In the first place, as a bank financing activities and projects that promote a solid, competitive and sustainable business fabric. Secondly, as a State Financial Agency contributing to social, economic and environmental development by managing financing instruments on behalf of the various ministerial departments.

In this context, ICO considers that sustainability in its environmental, social or governance aspects is a basic guiding pillar of its activity, due to the growing interrelationship with its mission and objectives.

Due to its public nature and its vocation to serve society, ICO prioritises the financing of activities that have a positive impact on people, the climate and the environment, and considers that it plays an important role in the development and support of Spain's energy and climate policy.

Therefore, it approves this Environmental Policy, which defines ICO's commitment to managing and controlling its direct impacts on the environment and analysing and monitoring the indirect impacts generated from the financing of third-party activities and projects.

II. PURPOSE
This Environmental Policy establishes the guidelines and commitments that must be followed for the control and management of direct and indirect environmental impacts generated in the development of ICO's activities, products and services.

III. SCOPE
The guidelines and commitments established in this policy are applicable to all ICO professionals within the scope of their powers and responsibilities. It also applies to professionals from service providers who carry out their tasks on ICO premises and to all those professionals who act in the name and on behalf of the Institute.
IV. COMMITMENTS

ICO, as a signatory to the 10 Principles of the Global Compact, the Equator Principles, and the Spanish Collective Commitment to Climate Action signed with the AEB, CECA and other Spanish financial institutions, and in its alignment with the 17 Sustainable Development Goals for Agenda 2030, and with the Paris Climate Agreement (COP-21), establishes the following commitments for the control and management of its direct and indirect environmental impacts:

- **Leadership**: ICO's Management approves this Environmental Policy and is committed to leading and promoting the implementation and compliance with the commitments established herein. It is committed to defining objectives for improving environmental management, responsible use of resources and adaptation to climate change. It is also committed to approving the allocation of financial and non-financial resources necessary to achieve the objectives defined to improve environmental management.

- **Responsible and ethical management**: In the area of environmental management, the conduct of ICO professionals is governed by the requirements set out in the Code of Ethics and Conduct.

- **Environmental impacts**: ICO is committed to identify the environmental aspects inherent to its activity and evaluating the positive and negative impacts that they have on the environment.

- **Legal requirements and other requirements**: ICO is committed to strict compliance with current regulations, for which it will identify and evaluate compliance with the legislative and regulatory requirements that apply to it. Likewise, it is committed to identify and evaluate compliance with the environmental requirements established by national and international initiatives to which it voluntarily adheres (Equator Principles, 10 Principles of the Global Compact, Paris Agreements, etc.).

- **Context**: ICO is committed to analyse the internal and external circumstances that influence its environmental impact, and which stakeholders interact with ICO in its environmental performance.

- **Risks and opportunities**: ICO is committed to identify and evaluate the risks and opportunities that its activity and its products and services have on the environment. It is also committed to define treatment plans for the risks and opportunities with the greatest impact on the environment.

- **Pollution**: ICO is committed to measure greenhouse gas (GHG) emissions and to develop prevention, reduction and remedial actions if they have a significant impact on
the environment. Similarly, ICO is committed to measure and manage any other type of environmental pollution directly or indirectly derived from its activity.

- **Circular economy and waste prevention and management**: ICO is committed to implement processes and tools to facilitate the sorting and management of waste generated in its facilities, and to raise awareness among its professionals so that waste sorting practices become part of their daily lives. ICO is committed to study and formalise agreements that promote circular economy practices for the reuse of waste.

- **Environmental protection and pollution prevention**: ICO is committed to implement the necessary processes and tools to protect the environment and prevent pollution, and to raise awareness among its professionals and its supply chain.

- **Sustainable consumption of natural resources**: ICO is committed to implement practices for the sustainable and responsible consumption of natural resources, and to define energy efficiency and improvement plans.

- **Training and awareness**: ICO is committed to define training, information and communication actions to improve its professionals' environmental management.

- **Suppliers and supply chain**: ICO is committed to including environmental requirements in the processes for contracting goods and services, if they comply with the legal requirements established in the Law on Public Sector Contracts.

- **Activity**: ICO is committed to integrate environmental variables in the study and development of financial products, favouring activities and projects that improve environmental performance. In the same way, for all its activity, direct financing, financial intermediation lines, fundraising and venture capital activity, ICO will assess the applicable environmental policies and practices, excluding activities that generate negative impacts on the environment, and those in which the developer does not adopt the necessary measures for their adequate management and mitigation.

ICO is committed to value environmental aspects in the formalisation of its loans, and transferring the principles and values of respect for the surroundings and the environment to the companies that are financed through the products marketed by ICO. As a mediator of financing lines, ICO will strengthen partnerships with financial institutions to transfer and promote these values to the organisation and management of SMEs and self-employed entrepreneurs.

- **Monitoring**: ICO is committed to define a set of environmental indicators that make it possible to evaluate the management, control and improvement of environmental
impacts, as well as to monitor the environmental objectives approved by Management.

- **Performance evaluation**: ICO is committed to establish the internal processes and procedures necessary to monitor, analyse and evaluate environmental management.

- **Review and continuous improvement**: Periodically, ICO Management is committed to review the adequacy of this Policy, compliance with the commitments defined herein, and the degree to which the defined objectives are met. It is also committed to approve the continuous improvement actions of the Environmental Management System necessary for effective environmental management.

V. ENVIRONMENTAL MANAGEMENT SYSTEM

For the management, control and monitoring of the commitments established in this Environmental Policy, ICO's Management approves the development and implementation of an environmental management system based on the international standard ISO 14001.

Said environmental management system will be subject to verification by a certification body accredited by the *Entidad Nacional de Acreditación* (National Accreditation Entity - ENAC).

VI. PUBLICATION

ICO will publish the Environmental Policy on the intranet and on the external website ([www.ico.es](http://www.ico.es)).

VII. ENTRY INTO FORCE

The Environmental Policy enters into force on November 17, 2020, date of its approval by the Management (Operations Committee).