

Guide to Sustainable Financing in the Extractive Sector

Within its Risk Management and Control Framework, Bankinter has approved its framework for financing in particularly controversial or risk sectors, and whose social and environmental impact may be significant. To this end, it has drafted "Sustainable financing Guides" that allow it to establish the measures and references that the Bank will follow in its decision-making, always taking into account, and when possible, the best international practices and standards.

These guidelines reflect Bankinter's commitment to sustainable development and the importance that the Bank attaches to the monitoring of good practices by its customers.

Among the sectors mentioned above, the mining sector is identified as one of those that generate the greatest environmental, economic and social impact. Bankinter expects companies in the sector to comply with and develop their projects in accordance with existing local laws, as well as with international agreements ratified by the countries in which they operate.

In addition, the Bank recognises the importance of the risks and impacts associated with activities within the mining sector (in the environmental, social, and governance realms), and therefore will pay special attention to

- The mining operations and projects that are developed in areas and countries with a history of weak regulatory frameworks, lack of transparency or high corruption and/or violation of human rights.
- The possible impacts on natural habitats and/or protected areas due to biodiversity considerations.
- The social impact due to possible displacements of vulnerable groups.

- The social and economic risks derived from the commercialisation of minerals whose extraction is carried out in zones of armed conflict.
- The consumption of large volumes of water that reduce its availability and/or quality, as well as the possible contamination of ground and surface water due to the operations of the mine.
- The impact of methane emissions from deep mines and the burning of extracted coal for power generation.
- Health and safety management of workers, paying special attention to accident rates, particularly in underground mines.

Within the framework of analysing the risks described above, Bankinter supports and takes as a reference international initiative that propose greater transparency and control of the sector, which include:

- The International Finance Corporation (IFC) Guidelines on Environment, Health and Safety for the Mining Sector.
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- EU regulation 2017/821 establishing due diligence obligations in the supply chain with regard to Union importers of tin, tantalum and tungsten, their minerals and gold from conflict or high-risk areas.
- The EU principles on the responsible sourcing of minerals originating in conflict-affected and high-risk areas.
- The ICCM (International Council on Mining & Metals) principles on mining and metals.
- Convention concerning Safety and Health in Mines approved in 1995 by the International Labour Organisation.
- The Kimberley process on the extraction and commercialisation of diamonds. - The International Cyanide Management Code For the Manufacture, Transport, and Use of Cyanide In the Production of Gold.
- The Extractive Industries Transparency Initiative (EITI).

Implementation

Compliance with this guide will be the responsibility of Bankinter's risk units and business units.

This policy will be applied to all clients and projects that Bankinter provides services to. Specifically, within this sector, activities to be evaluated include prospecting, mining exploitation and operation, including processing of by-products and mineral marketing, and finally, natural habitat restoration.

Following the principles and values on which Bankinter bases its growth, the Bank commits not to grant any form of financing to projects in the extractive sector when there is concrete evidence that they are:

- ❑ The mining area or associated facilities are in areas that are considered UNESCO World Heritage or wetlands included in the Ramsar list.
- ❑ The activities carried out are related to the extraction, processing and commercialisation of asbestos.
- ❑ The activities carried out require the displacement of vulnerable local populations, such as indigenous communities.
- ❑ The projects are related to the so-called "minerals in conflict", if they do not present the corresponding certification.
- ❑ The projects are related to the extraction and marketing of rough diamonds not certified by the Kimberley process.
- ❑ The activities take place within an area of active armed conflict.
- ❑ The projects do not operate in accordance with the requirements established in Convention C 176 on Safety and Health in mines approved in 1995 by the International Labour Organisation (ILO).
- ❑ Companies that cannot provide a health and safety plan.
- ❑ The projects do not include a specific tailing treatment plan (to avoid contamination of surface and groundwater) and a plan to recover the environment after the completion of the activities.

- Coal mining activity, from January 2025 onward, including existing operations, whether or not they have a decarbonization strategy, unless they are included in one of the Just Transition Programs.

Additionally, the Bank commits to not providing its financial services to clients whose activities consist of more than 25% thermal coal extraction and who do not have a diversification or decarbonization strategy. Furthermore, it commits to having no exposure to thermal coal mining by 2030.

Conclusion

Bankinter is committed to adhering to this guide and its proper implementation, as well as continuous review, in accordance with the best practices and recommendations that are being introduced internationally. The ultimate goal of this policy is to ensure a transition of clients towards the best social, economic, and environmental practices in the countries and communities where they operate.