



# Bankinter Group Sustainability Policy

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## I. INTRODUCTION

When running their business, the main aim the various entities that make up the Bankinter Group is not only to fulfil their individual purpose, but also to create shared value with their strategic stakeholders (customers, shareholders and investors, employees, regulators, supervisors, suppliers and society in general). To make this happen, ethical and responsible behaviour guidelines have been implemented with the aim of building a stable relationship of trust, aligned with the corporate purpose and values—Agility, Enthusiasm, Integrity and Originality—which define the behaviour that the Bankinter Group must follow when fulfilling its objectives and meeting national and international standards in terms of sustainability.

Bankinter has a Sustainability management system in place, which has been progressively embedded into the Group's management in a global and transversal manner. The system pursues continuous improvement in sustainability performance, both from a financial standpoint and in terms of the environmental impact, all aligned with the best practices contained in international conventions and protocols, codes of conduct and internationally applicable guides in this area, notably the 2030 Agenda, the Sustainable Development Goals and the Paris Agreements, among others.

Accordingly, the Sustainability Policy of the Bankinter Group (the "**Policy**") sets out a framework of action whereby the Bankinter Group (hereinafter, "**Bankinter**" or the "**Group**") integrates the values and purpose of its activity and includes the principles and lines of action, implementation instruments and rules of governance applicable to the definition and implementation of the social, environmental and good governance objectives of Bankinter and its Group, in connection with its activity with employees, customers, suppliers, shareholders, investors and other stakeholders. The Policy is complemented by the other policies established by the Group.

This Policy develops the Sustainability Framework and is complemented by the rest of the Group's policies related to the three key areas: Environmental, Social and Governance (ESG).

## II. SCOPE OF APPLICATION

This Policy applies directly to Bankinter, S.A. and to all the entities that make up the wider Group, which in turn shall draw up and approve, where necessary, any specific internal regulations ensuring the effective application of the provisions contained

herein, subject to those adjustments that prove strictly necessary to ensure compliance with local legislation, regulatory requirements and expectations.

### III. PRINCIPLES

The definition and implementation of the environmental, social and governance objectives of Bankinter and its Group will be governed by the following principles

- **Environmental dimension (E).** Bankinter will conduct its activities in accordance with the most advanced standards in environmental responsibility, including initiatives to reduce carbon emissions, the efficient use of natural resources and waste management. In developing this principle, Bankinter:
  - will manage any material direct or indirect environmental impacts that its businesses and activities could cause, by promoting positive impacts and reducing negative impacts.
  - support its customers in their transition towards more sustainable business models, acting as a lever to enhance such behaviors or actions.
  - integrate environmental, climate and energy efficiency aspects into the Group's activities, products and services.
  
- **Social dimension (S):** Bankinter will consider, when carrying out its activities, the impact on communities, diversity and inclusion, working conditions and commitment to stakeholders. When observing this principle, Bankinter will:
  - Ensure a direct and indirect positive social impact in the most relevant areas that its businesses and activities may generate, promoting positive impacts and reducing negative impacts.
  - Ensure a balanced, accessible, honest, transparent and clear relationship with its customers and stakeholders in general, offering products that cater to their needs and outstanding levels of service.
  - Guarantee a human resources management system that fosters their well-being and engagement through work-life balance measures, personal and professional development, and safety and health, while also fostering inclusion and diversity of the human team.

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- **Support the social development of the** communities in which the Group operates, both through its own activity and through initiatives aimed at social investment and financial inclusion, supported by dialogue and collaboration with the not-for-profit sector and the corporate volunteer programme.
  - **Respect human rights** across all territories in which the Group operates, in accordance with its Human Rights Principles and under the guidance of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights of Workers and other internationally recognised codes, such as the UN Global Compact.
  - **Governance dimension (G).** Bankinter shall have internal governance rules that guarantee corporate ethics, transparency and compliance with prevailing legislation. When pursuing this principle, Bankinter will:
    - **foster a risk culture governing the actions of everyone who is part of the Bankinter Group, ensuring, in their relationship with their stakeholders, non-discrimination, transparency, business ethics, an appropriate risk management culture, the fight against money laundering, corruption and terrorist financing and the establishment of a transparent tax policy with responsible and prudent criteria.**
    - **have a structure of governance bodies and a set of clear internal regulations in place, with well-defined roles and responsibilities and effective control systems,** promoting best practices in corporate governance and, in general, sustainability in management, to ensure compliance with prevailing legislation.
    - **preserve the integrity, confidentiality, privacy and availability of information by applying best practices in information security and cybersecurity.**
    - **ensure the involvement of the board of directors** in making sustainability part of the group's strategy (in the short, medium and/or long term), commercial and financial plans and in the risk management, control and supervision model.
    - **ensure the responsible and sustainable management of the supply chain,** fostering respect for the Group's ethical, environmental, social and governance commitments set out herein.

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## IV. LINES OF ACTION AND IMPLEMENTATION INSTRUMENTS

### IV.1. – Lines of action.

- In the environmental realm:

To comply with the above principles, Bankinter works to minimise the environmental impact of its operations and comply with prevailing environmental law and regulations, as well as other requirements assumed voluntarily.

Through its banking and financial activities, Bankinter works to integrate environmental aspects transversally across the organisation. In doing so, it looks to reference frameworks and standards, including those of the United Nations and the European Union.

Lines of action in this regard include:

- Identify environmental impacts, risks and opportunities during the process of analysing financing and investment activities.
- Contribute to environmental protection and climate change mitigation by offering products and services that support the energy transition to other low-emission models.
- Analyse environmental risks and their impact on financial activity, for their steady integration into corporate policies, processes and management systems, including compliance with regulatory requirements.
- Monitor the alignment of our customer lending portfolios towards a low-carbon and resilient economy.
- Transparently communicate progress in environmental sustainability, informing our stakeholders' decision-making and promoting environmental awareness.

When it comes to the Group's direct environmental impact, Bankinter focuses the effectiveness of its management on:

- Implementing and continuously improving its management systems based on international standards.
- Measuring and making public its carbon footprint, deploying a plan to reduce emissions, considering the supply chain also and relying, among others, on the use of renewable energies, including self-consumption, and the reduction of the use of fossil fuels and energy efficiency in buildings, data processing centres and customer service offices.

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- Promoting environmental protection by applying the principle of pollution prevention with the aim of minimising and ultimately offsetting potential negative impacts on the environment.
  - Promoting responsible resource control and consumption, as well as proper waste management by minimising waste generation.
  - Managing the proper documentation and implementation of an environmental management system that includes an environmental performance review procedure and the monitoring of indicators linked to the system.
  - Working to integrate continuous improvement into the system and environmental performance by establishing environmental objectives.
  - To facilitate compliance, Bankinter employees are trained to foster a sense of environmental responsibility in their actions, disseminate good practices and promote involvement and participation in both the environmental management system and the actions carried out.
- **In the Social dimension:**

Bankinter works to support and have a positive impact on the communities where the Group operates, diversity and inclusion, employee working conditions, commitment to customers and other stakeholders and respect for Human Rights in all its activities, in accordance with the main international treaties and current regulations.

Lines of action in this dimension include, among others:

- Identifying social impacts, risks and opportunities during the process of analysing financing and investment activities in a manner consistent with international benchmarking standards.
- Building long-term relationships of trust with customers, including vulnerable customers, by adapting to their needs and improving their satisfaction, offering products and/or services tailored to their circumstances and needs and facilitating access to products and services they understand, thereby contributing to the development and economic stability of the communities in which we operate.
- Promoting decent employment that fosters a work-life balance and attracts and engages the best professionals by fostering meritocracy, equal opportunities in access to work, professional advancement and fair and equitable compensation, avoiding discrimination and practices that violate human dignity; rejecting all forms of forced labour and child exploitation, respecting freedom of association and negotiation and protecting the safety and health of professionals.

- Analysing social risks in financial activity and compliance with regulatory requirements, which involves continuous improvement in identifying and managing social risks in the Group's financial and investment dealings.
  - Supporting society by promoting employability and entrepreneurship; financial education to provide the communities where we operate with tools and knowledge to facilitate their financial decision-making; programmes to support vulnerable people; programmes to support culture, institutional activities and support specific local needs; and the participation of working people through volunteer initiatives. Bankinter is the sponsor of the Bankinter Foundation for Innovation, whose mission is innovation and entrepreneurship.
  - Promoting a culture of human rights at all levels of the organisation, including training on this subject.
- **In the Governance dimension:**

The Group aims to ensure transparency and good governance and to incorporate environmental, social and governance factors into its governance model, in order to safeguard the interests of all stakeholders and maintain their trust.

Lines of action in this dimension include, among others:

- Periodically reviewing the law and regulations applicable to the Bankinter Group to ensure due levels of compliance, as well as the voluntary standards to which the Group adheres.
- Establishing environmental and social criteria in supplier reviews, including clauses in contracts that promote compliance and ethical treatment.
- Taking the necessary steps to prevent and avoid corruption in all its forms, including extortion and bribery, acting as a benchmark in the fight against money laundering, fraud, corruption, terrorism and other serious crimes.
- Establishing information security and cybersecurity mechanisms to preserve the integrity, confidentiality, privacy and availability of information.
- Promoting transparency in accountability and the dissemination of information to stakeholders.
- Continuing to progressively incorporate sustainability-related criteria into the remuneration and compensation practices of staff and management.

#### **IV.2.- Instruments for implementation.**

Bankinter has established the following instruments for the purpose of implementing the above guidelines:

1. **The multi-year Strategic Sustainability Plans:**

- **Strategic Lines**, which serve to implement the Strategic Plans by identifying material aspects, among others.
- **Programmes and related** social, environmental and governance objectives implementing the strategic lines;

2. **Channels of communication and dialogue.**

3. **Training and development of skills.**

- **Strategic Sustainability Plans:**

The strategic sustainability plans are the result of a double materiality assessment that Bankinter periodically carries out. This is a process that identifies sustainability issues that present positive and negative impacts, as well as material risks and opportunities (IROS) in the environmental, social and governance spheres, looking at the entire value chain. This exercise is the basis of the Bankinter Group's sustainability strategy.

The materiality assessment is carried out using the same methodology and in a coordinated manner between the group and its subsidiaries, thus providing useful feedback on the results of the exercises.

The exercise uses available information, including the results of adverse impact identification exercises, such as due diligence in the social, environmental and governance dimensions. The reference time horizon is short to medium term (between 1 and 5 years). The double materiality assessment, material impacts, risks and opportunities and Bankinter's sustainability strategy are reported to the sustainability and appointments committee of Bankinter's board of directors on a regular basis.

- **Communication and dialogue channels:**

Bankinter maintains active and ongoing dialogue with its main stakeholders: Employees, customers, suppliers, shareholders and investors, among others, are also specifically consulted during materiality and human rights due diligence exercises.

Collaborating with our stakeholders is key to understanding their expectations, informing them of our priorities and identifying opportunities and areas for improvement that are then integrated into the Bank's key processes.

- **Employees.** There are various mechanisms in place to ensure dialogue with Group employees, including employee climate surveys and the confidential whistleblowing channel, which is also available to other stakeholders.
- **Customers.** Customer surveys (NPS, Net Promoter Score) are carried out with the main objective of measuring customer satisfaction and experience. Moreover, and in relation to the commercial relationship between bank and customer, needs or areas for improvement are identified and transferred so that they can be addressed or, as the case may be, so that the commercial strategy can be adapted accordingly.
- **Suppliers.** The goal of the dialogue, through the supplier certification platform, is to help our value chain advance in sustainability while increasing the group's resilience to environmental and social risks.
- **Shareholders and investors.** The aim of the dialogue is to build stronger relations with shareholders and to offer a differential value-added proposition for their investment. There are various channels in place that allow for fluid dialogue conducive to a clearer understanding of the business and how it is governed. Participation channels include events and direct meetings, among others.

- **Training and skills development**

Sustainability training at Bankinter for all employees is essential to foster the skills needed to perform the responsibilities assigned to them and to support the principles, lines of action and instruments contained in this Policy.

## V. COMPETENT BODIES

The following bodies have remit over those matters covered by this Policy:

- I. The **Bankinter board of directors**, as the most senior governing body with remit to establish the Group's Sustainability Policy and approve any necessary modifications.
- II. The sustainability and appointments committee, which advises and submits proposals to the board on those matters covered by this Policy, while also monitoring its implementation and approving its implementing instruments. It also ensures that the Company's non-financial and diversity information is made public in accordance with applicable legislation and international benchmarks,

and coordinating its reporting, without prejudice to the powers vested in other committees.

- III. The **board's risk and compliance committee**, which is responsible for monitoring the trend in the Group's risks and their degree of adequacy with the defined culture, strategies and policies, including those related to sustainability, as well as the Group's Risk Appetite Framework, and for overseeing the procedures, tools and risk measurement indicators in place at Group level in order to ensure a global view of the risks facing both the Bank and the Group.
- IV. The **board's audit committee**, advising the board of directors in advance regarding the related non-financial information that the Company must periodically disclose, without prejudice to the duties corresponding to other committees, ensuring in particular the clarity and integrity of this information; as well as reviewing, analysing and commenting on an ongoing basis on any relevant non-financial information in collaboration with management, internal audit and the external auditor.
- V. The **sustainability committee** . This body will have coordination functions on matters of sustainability and will be responsible for drawing up the proposal for the multi-year Strategic Sustainability Plan and promoting, within the Bankinter Group, compliance with the principles enshrined in this Policy, as well as the objectives of the prevailing strategic sustainability plans.
- VI. **The Sustainability Department** is responsible for:
  - Carrying out the actions defined in the current strategic plans, as well as the lines effectively implementing them.
  - Monitoring and verifying the alignment of the various areas, subsidiaries and branches and the degree of achievement of the objectives set out in the plan, reporting on all of this periodically to the sustainability and appointments committee and the sustainability committee.
  - Identifying areas for improvement, based on internationally recognised standards, norms, guidelines and ethics and sustainability indices, as well as the proposed adoption of instruments for the purpose of implementing this Policy, for approval by the appropriate body based on their materiality.
  - Providing the necessary information to the areas responsible for drawing up the accountability reports to be submitted to the various regulators and competent bodies and other stakeholders, as well as the information required by investors and sustainability analysts.

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- Preparing the sustainability information to be disclosed annually in the Group's annual financial accounts, in accordance with prevailing law and regulations, which the board of directors of Bankinter, at the proposal of the sustainability and appointments committee (and verified by the audit committee), will submit to the Annual General Meeting for approval each year.
- VII. The **Non-Financial Control area** is responsible for the effective implementation of control systems for non-financial information within the Bankinter Group.
- VIII. The **Internal Audit** area will review the consistency of the Group's sustainability information, which is made public, unless it is verified externally, reporting the results of said review to the audit committee, as well as any other committee deemed necessary.

## VI. REVIEW OF THE POLICY

This Sustainability Policy was approved by Bankinter's board of directors, at the proposal of the sustainability and appointments committee, on 21 May 2025.

The development and interpretation of this policy is the responsibility of the Sustainability Department.

This policy will come into effect once approved by the board of directors and will be published on Bankinter's corporate website.

Its content will be subject to periodic review and any changes or modifications deemed appropriate will be made.