

ENVIRONMENTAL AND CLIMATE CHANGE POLICY FOR THE BANKINTER GROUP

I. INTRODUCTION

The Bankinter Group (hereinafter the "Group") is keenly aware of the global challenge of protecting the environment and combating climate change, which is why its sustainability strategy includes guidelines and programmes aimed at minimising direct environmental impacts, caused directly by its own operational activities, and indirectly, mainly by its financial activity.

II. PURPOSE, PRINCIPLES AND SCOPE

1. Purpose

The purpose of this policy is to establish the Group's framework for action in matters of the environment and climate change for all of its activities, establishing improvement goals in terms of:

- the Bankinter Group's contribution to the transition to a sustainable economic model.
- the integration of climate change risk management and the detection of new business opportunities associated with the transition to a low-carbon economy.
- the involvement of all our stakeholders in the group commitment to act against climate change
- Biodiversity protection.
- comprehensive management of the Bankinter Group's environmental footprint.

As a result, the Group complies with European and Spanish legislation on environmental issues and climate change, and has based this policy on the main standards established, including:

- Law 7/2021, of 20 May, on climate change and energy transition.
- Law 26/2007, of 23 October, on environmental responsibility.

- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on setting a framework to facilitate sustainable investments and amending Regulation (EU) 2019/2088.
- UNE-EN ISO 14001 International Standard for Environmental Management System (EMS)
- UNE-EN ISO 14064 International Standard for GHG Emissions.
- Recognised environmental reporting standards for non-financial reporting.

The Bankinter Group also applies the principles of conduct for the fight against climate change and protection of the environment contained in internationally recognised protocols and standards, including the United Nations Framework Convention on Climate Change (UNFCCC), the Paris Agreement for Climate Change, the United Nations Sustainable Development Goals, the Vienna Convention and the Montreal Protocol on Substances that Deplete the Ozone Layer.

With the aim of being at the forefront of best practices in environmental matters, the Bankinter Group has adhered to different international initiatives such as:

- Spanish United Nations Global Compact Network.
- World Business Council for Sustainable Development (WBCSD).
- Equator Principles.
- United Nations Environment Programme Finance Initiative (UNEP FI).
- United Nations Principles for Responsible Banking.
- Net Zero Banking Alliance.
- Task Force on Climate-Related Financial Disclosures.

2. Principles

The Bankinter Group is committed to protecting the environment, preventing pollution, mitigating the effects of climate change and adapting to it, conserving biodiversity, promoting the circular economy and protecting water resources, guided by the following principles:

1. Comply with the environmental requirements established in applicable legislation and the commitments signed by the Bankinter Group in this matter.

2. Implement the necessary processes to ensure the continuous improvement of the environmental management system and therefore improve the Group's environmental performance.
3. Involve the Bankinter Group's stakeholders in implementing biodiversity conservation, environmental protection and anti-pollution projects.
4. Raise awareness and train employees in environmental management in order to promote a rational and efficient use of natural resources, as well as in managing climate change risks and opportunities in financial activity.
5. Take an environmentally conscious approach to its business activities, involving its main stakeholders in the global challenge posed by climate change and loss of biodiversity.
6. Incorporate environmental criteria throughout the Group's value chain, both in its relationship with its suppliers and in risk management and investment and financing analysis.
7. Integrate climate change risks and opportunities in decision-making processes, minimising the impact of its financial activity and supporting customers in the transition to a low-carbon economy.
8. Design and market innovative financial products and services that generate added environmental value.
9. Participate in initiatives, both national and international, that contribute to the protection of the environment and the fight against climate change through its financial activity.
10. Promote responsible behaviour among all stakeholders by regularly reporting the progress and results of their environmental performance.

3 Scope

This corporate policy is applicable to the entire Bankinter Group.

III. INSTRUMENTS TO IMPLEMENT THE ENVIRONMENTAL AND CLIMATE CHANGE POLICY

The Group implements its sustainability and climate change policy while always guaranteeing its full suitability and consistency with the Bankinter strategy and the demands of a changing environment, through the following instruments:

- The Bankinter Group Sustainability Policy.
- The Strategic Guidelines related to the environmental dimension included in the successive sustainability plans.
- Related programmes and their goals arising from implementation of the strategic guidelines.
- The Environmental Management System and the Carbon Footprint Management System.
- The Group's other internal policies and codes, which reflect the guidelines set out by the Bank for various areas. In particular, the investment sustainability principles included in the Bankinter Group's Risk Control and Management Framework, the Sector Financing Guidelines and the Policy for the Integration of Sustainability Risks in Investment Decisions and Advice, among others.

IV. MONITORING AND CONTROL

Aside from the responsibility that falls to other bodies or areas of Bankinter over matters covered by this Policy, the monitoring and control of this Policy will be the responsibility of:

1. The **Sustainability Committee**, which is responsible for implementing this Policy and must report on its development to the Sustainability and Appointments Committee of the Board of Directors.
2. The **Management Systems Working Group**, which is responsible for the operational development of the environmental strategy. The Group will be made up of the following areas of the Bank: Sustainability, Digital Accessibility, Properties, Training, Quality and Occupational Health and Safety.
3. The **Sustainability Department**, which is responsible for coordinating the actions defined in the Environment and Climate Change Strategy Guidelines and Programmes, verifying the level of compliance with the established goals and identifying areas for improvement, according to internationally recognised standards, regulations, guidelines and the proposal for adopting instruments to implement this Policy.

V. APPROVAL

The Corporate Sustainability Committee is responsible for approving this Policy, agreeing on any necessary changes and improvements.

This environmental policy will be regularly reviewed and updated to adapt to the Bankinter Group's progress and new external requirements.

VI. DISSEMINATION

This Policy will be published using the usual external and internal communication channels, including the [corporate website](#) and the [Bank's intranet](#)

Madrid, 3 November 2022

Signed. Pedro Guerrero Guerrero
Chairman of the Sustainability Committee
Chairman of the Board of Directors