

BANKINTER GROUP POLICY ON HUMAN RIGHTS

INTRODUCTION

For its operations, Bankinter Group (hereinafter, the 'Group') adopts certain responsible conduct standards to respect and uphold human rights in its internal and external relations. It assumes the duties defined in internationally recognised protocols and standards, including the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the Equator Principles.

PURPOSE AND SCOPE

The purpose of this policy is to define the Group's commitment to respecting, supporting and protecting human rights as part of its business activity and relations with its stakeholders in the environment in which it operates.

This policy delineates the Group's human rights action framework for its employees, its customers, its suppliers and other business partners, as well as the environment in which it conducts business, under the UN 'Protect, Respect and Remedy' Framework.

This policy also includes the Code of Professional Ethics ('CEP'), the Code of Conduct for Suppliers ('CCP') and other policies adopted by Bankinter for corporate governance; remuneration; governance; anti-money laundering; transparency; investment and financing; purchasing; work-life balance; equality; safety, health and well-being; accessibility; and the environment and climate change.

HUMAN RIGHTS PRINCIPLES OF THE GROUP

The following principles govern this policy:

I. Regarding its **employees**, the Group must:

1. respect and protect their fundamental rights as relates to their personal integrity.
2. foster a decent work environment by promoting equal opportunity in terms of work access and career advancement; ensuring that no one is discriminated because of his or her sex, race, religion, origin, civil status or social status; and guaranteeing work practices to reconcile work life and personal and familial circumstances.
3. provide them with decent remuneration in accordance with their skills, level of responsibility, duties and experience.
4. ensure their right to protect their personal data as well as their right to privacy.
5. facilitate a work environment that is free of harassment, abuse, intimidation and violence.
6. respect the right of association and collective bargaining.
7. follow current safety and health laws for the workplace and implement any measures deemed necessary to this end.

These rights are found in various policies and programmes implemented by the human resources area.

II. Regarding its **customers**, the Group must:

1. not finance companies known to not respect or support fundamental rights and particularly child labour rights, discrimination and forced labour.
2. establish a balanced, transparent and clear relationship, developing products and services based on their needs and circumstances.

3. facilitate the participation of individuals with disabilities in finance and seek to ensure their access to the Group's products and services on equal terms.
4. comply with anti-money laundering and terrorism financing laws by using computer-based tools designed for this purpose and providing staff with precise training in these matters, in accordance with the regulatory compliance culture that defines the Group.
5. guarantee that regulatory standards on personal data use are followed.
6. ensure respect for the environment and the efficient use of natural resources.
7. assess the human rights policies and practices of its counterparties when conducting analyses prior to formalising any financing or other agreements, in accordance with the Equator Principles and irrespective of any specific policies adopted by the Group to manage social and environmental risks in the sectors of mining, defence and agriculture.
8. provide employees with the appropriate tools and necessary training in order to implement the Responsible Lending Policy by examining and assessing the needs of customers through methods and procedures for analysing and granting funding based on such aspects as ability to pay, the prudent relationship between loan amounts and guarantee or asset values, information on the costs of related products and debt rescheduling.

III. Regarding its **suppliers and other business partners**, the Group must:

1. establish mechanisms to better implement the principles set out in the UN Global Compact, of which the Group has been a member since 2009, with regard to human rights, labour, environment and anti-corruption.
2. divulge this human rights policy to its suppliers and business partners.
3. establish a single procurement procedure for all Group companies to follow through on its commitment to respecting human and labour rights and preventing corruption.

IV. Regarding the **environment** in which the Group operates, it must:

1. contribute to social development within its area of influence, through its own activity and social initiatives intended for citizens; and guarantee full respect for human rights.
2. implement any physical, banking, IT and digital safety measures necessary to ensure that the rights and freedoms of those who interact with the Group are respected.
3. work against corruption in all forms, including extortion and bribery.
4. consider economic, social and environmental impacts when designing its products and services; and adopt any environmental, social and governance-related standards deemed necessary when analysing funding and investments.

APPROVAL

The Corporate Sustainability Committee is charged with approving this policy and monitoring the level of compliance with the principles set out herein and may resolve to make any amendments or improvements it deems necessary.

SUPERVISION AND CONTROL

I. With regard to **customers**:

The Group has a Code of Professional Ethics ('CEP') that applies to all Group employees and defines principles on not violating human rights as well as control mechanisms and bodies. The competent bodies and individuals for ensuring compliance with the Code of Professional Ethics are the crime prevention and professional ethics committee, internal audit managers, human resources managers, and the regulatory compliance and anti-money laundering unit.

The Group has an internal whistleblowing channel (<http://intranet.elGrupo.bk/sites/home/pages/deconfi.aspx>) so that employees may report any irregularity or infraction of which they become aware, especially in regard to the principles of this policy.

The Group promotes a culture of respect for human rights amongst its employees and includes specific courses on this matter within its training plans.

II. In its dealings with **customers**:

The risk control unit is responsible for monitoring and overseeing the compliance of business units with the principles set out in this policy and in the sectoral policies in effect.

The Group provides its customers with a customer service area (<https://www.bankinter.com/banca/nav/atencion-cliente/elevar-reclamacion>) and a customer ombudsman for any claim or complaint in relation to the contents of this policy.

III. For **providers and other business partners**:

The Code of Conduct for Suppliers can be found on the Suppliers Portal. External communications and corporate social responsibility managers are responsible for properly posting and divulging this code.

Purchasing managers are in charge of monitoring and overseeing compliance with the code.

The whistleblowing channel can be found at <https://bankinter.avanti-lean.com/supplier/portal/bankinter/> in order to report any irregular conduct identified by suppliers in their dealings with Group employees.

IV. In regard to the **environment** in which the Group operates:

The sustainability committee, specially trained in human rights, is responsible for regularly monitoring and overseeing compliance with the guidelines set out in this policy.

COMMUNICATION

This policy on human rights will be posted through the usual internal and external communication channels, on the corporate website (<https://webcorporativa.bankinter.com>) and on Bankinter's Intranet page (<http://bkintranet.bankinter.bk>).

In Madrid, on 14 June 2018

Signed: Pedro Guerrero Guerrero

CHAIRMAN OF THE SUSTAINABILITY COMMITTEE