

# Consolidated Non-Financial Information Statement

For the financial year ended  
on 31 December 2021



## Appendix.

# Non-Financial Information Statement pursuant to Law 11/2018, of 28 December, in relation to non-financial information and diversity

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This report on the Consolidated Non-Financial Information Statement of Cecabank (hereinafter, also called "the Entity" or "the Bank"), is formulated and published in compliance with Law 11/2018, of December 28, by which The Code of Commerce, the consolidated text of the Law on Capital Companies approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, on Auditing of Accounts, in non-financial information and diversity.

For the preparation of this Non-Financial Information Statement, the internationally recognized Global Reporting Initiative (GRI) Sustainability Reporting Guide has been taken as the reference standard, following the principles and content defined by the most recent version of the guide. updated, GRI Standards.

In this context, through the Non-Financial Information Statement, the Entity has the objective of reporting on environmental, social and personnel and human rights issues and those related to the fight against corruption and bribery that are relevant to the Entity in the execution of its own business activities. In order to determine these issues, Cecabank has worked during the year on a materiality study that can be found in section 01F of this Non-Financial Information Statement.

Likewise, and in accordance with the provisions of Law 11/2018 of December 28, it is reported that this Non-Financial Information Statement is part of the Consolidated Management Report of the Cecabank Group, presented in a separate document.

In response to these material aspects, the main lines of extra-financial performance related to environmental, social, personnel and human rights issues, and those related to the fight against corruption and bribery are described.

# 01. About Cecabank

## COVID-19

Since the start of the pandemic, Cecabank has shown great concern for guaranteeing the safety and health of its employees and their families and, at the same time, maintaining the high quality of customer service. Proof of this was that, from the start of the pandemic, the Entity launched the Continuity and Contingency Plan for COVID-19.

Cecabank has continued to work in 2021 on health protection measures through protocols in three areas: Protection measures (cleaning, hygiene, clinical tests, etc.), guidelines regarding the use of common areas, travel, use of meeting rooms meeting, among others and facilitators that guarantee the necessary technical means to maintain protection in any action that is carried out, At the beginning of 2021, the Entity was recognized by the Community of Madrid with the

"Madrid Guarantee" distinctive for the measures adopted and the solidarity activity around the prevention and minimization of the impact of COVID-19, In this way, Cecabank's compliance with the regulations related to the prevention of the virus and those extraordinary adopted to offer its employees and customers the best experience and the best services.

In line with its commitment to society and Public Administrations, Cecabank joined the CEOE Foundation's Sumamos Salud+Economía Plan in February 2021, in order to support the Administration in mitigating the adverse effects caused by the virus , Adherence to the Sumamos Plan incorporates new preventive measures, among which the performance of periodic diagnostic tests for employees who come to the office, key to curbing its spread, stands out.

## 01A. Our business model

Cecabank is a Spanish wholesale bank that offers innovative financial solutions and accompanies its clients in their projects to achieve their business goals.

Cecabank has its headquarters in Madrid and is present in the main European cities. The Entity has an operational branch in Lisbon and a representative office in London and Frankfurt, thus covering the markets of the United Kingdom, Portugal, Germany, France, Benelux and Switzerland.

As of December 31, the Entity grouped its products and services into three business lines: Securities Services, Treasury and Banking Services -dividing it into Digital Solutions and Payments:

1. Securities Services, securities depository and custody service, as well as value-added services in the securities and foreign exchange post-trading chain. This line of business is focused on maintaining leadership in the depository business, complementing the Securities Services value chain service

offering and boosting penetration in other markets.

2. Treasury management, focusing on increasing the returns, completing the offering with new services and maintaining its leadership in the banknote business in Spain.
3. Banking services, providing the market with multiple solutions in a mature business that is conditioned by new players and regulatory changes, with the objective of attaining and increasing the degree of customer loyalty, generating economies of scale and establishing collaborate of models in order to obtain new business. These banking services can be divided into the following:
  - a. Payments: includes the Payment Systems, Clearing and Discounting; Foreign Network; Payment Methods, Digital Payments and e-commerce services and the Payment Network Foreign Exchange, Strategic Payment Arrangements and FX Sharing initiatives.

- b. Digital Solutions: Comprising the services of the Treasury and Risk Services Centre, Electronic Banking; Reporting; Technology Services; Service Management and Technology Projects; and the Digital Services Enhancement and Blockchain initiatives.

Cecabank also provides the necessary associative services for the proper functioning of the CECA banking association, focused on the dissemination, defense and representation of the interests of its member entities.

For further information about the services that Cecabank offers, click on the link on the corporate website<sup>1</sup>.

During the 2021 financial year, the Entity has worked on the preparation of the 2022-2024 Strategic Business Plan, which is committed to transformation to consolidate growth. This new Strategic Plan, approved by the Board of Directors in the last quarter of the year, regroups its main businesses into three lines, Securities Services, Payments and Treasury, and identifies Sustainability as a growth vector. In this way, Cecabank has set as a strategic objective the fulfillment of the expectations of the interest groups in the three basic pillars of sustainability (Environmental, Social and Governance).

## 01B. Mission, Vision y Values



### Mission

Support financial entities and other corporations from the experience of a Spanish wholesale bank with international projection..



### Vision

- ⦿ Cecabank aspires to consolidate its leadership position as a custodian bank and provide specialized solutions for all types of financial entities and national and international corporations.
- ⦿ Accompany your clients, building lasting relationships, so that each decision is the result of mutual trust.



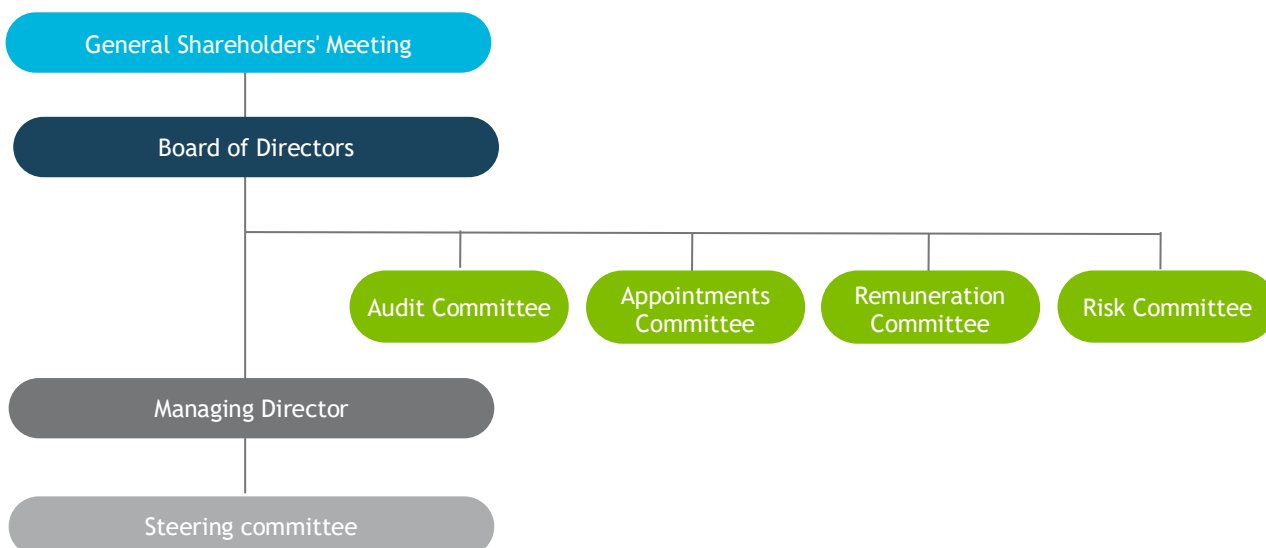
### Values

Specialization, Solvency, Commitment and Sustainability

<sup>1</sup> <https://www.Cecabank.es/sobre-nosotros/>

## 01C. Good Corporate Governance

Cecabank's corporate governance is made up of a set of rules, principles and policies that regulate the composition, structure and operation of the Governing Bodies (the General Shareholders' Meeting, the Board of Directors and its Committees), which are reviewed and /o updated periodically to adapt to national and international best practices.



Cecabank's General Shareholders' Meeting is the highest body for the representation and participation of shareholders in Cecabank. Cecabank's shareholder portfolio is made up of the following entities:

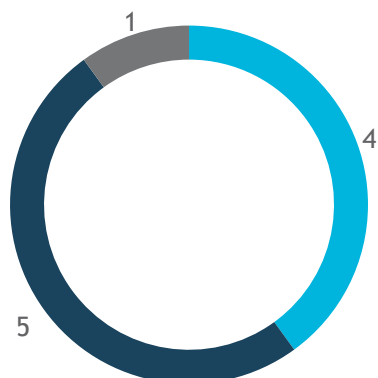
Entity	Number of shares	% shareholding
CECA	100.000.000	89,08 %
CaixaBank, S.A.	5.907.921	5,26 %
Kutxabank, S.A.	1.352.325	1,20 %
Unicaja Banco, S.A.	2.188.398	1,95 %
Ibercaja Banco, S.A.	765.561	0,68 %
Abanca Corporación Bancaria, S.A.	712.677	0,63 %
Banco Bilbao Vizcaya Argentaria, S.A.	644.683	0,57 %
Banco Sabadell, S.A.	574.171	0,51 %
C.A. y M.P. Ontinyent	57.920	0,05 %
Caixa D'Estalvis de Pollença	52.884	0,05 %

The administration, management and representation of Cecabank corresponds to its Board of Directors. The Board of Directors has the broadest powers for the administration of the Entity and, except in matters reserved to the competence of the General Shareholders' Meeting, in accordance with the provisions of the applicable legislation and the Bylaws, it is the maximum decision-making body and the person responsible for the risks assumed by the Entity.

The current composition of the Entity's Board of Directors is detailed in the "corporate information" space on Cecabank's website. As of December 31, 2021, the Board of Directors is made up of ten members, of which five are proprietary directors, four independent directors and one executive director.

## Board composition

■ Independent adviser ■ Proprietary Directors ■ Executive adviser



In addition, in compliance with the regulations on capital companies and on the organization, supervision and solvency of credit institutions, Cecabank has set up four committees, with their supervisory and advisory powers, which assist the Board in the exercise of its powers. These Committees are the Audit Committee, the Appointments Committee, the Remuneration Committee and the Risk Committee. All of them are made up of non-executive directors and the presidency is held by independent directors.

In accordance with the provisions of their respective regulations, the committees carry out, among others, the following functions:

- ⦿ **Audit Committee:** Supervises and assesses the effectiveness of the Entity's internal control, internal audit, and risk management systems, as well as supervises the process of preparing and presenting the mandatory financial information and presenting recommendations or proposals to the governing body, aimed at safeguarding its integrity.

- ⦿ **Risk Committee:** Advises the Board on setting and monitoring the Entity's risk tolerance levels and evaluates the application of this strategy by Senior Management and its results, as well as knowing and periodically analyzing the situation of solvency, liquidity and, in general, of the Entity's risks.
- ⦿ **Remuneration Committee:** Advises the Board in relation to the Entity's remuneration policies (remuneration policies for Directors, as well as for senior managers), and their alignment with the maintenance of risk tolerance levels.
- ⦿ **Appointments Committee:** Advises the Board regarding candidates for vacant positions on the Board of Directors, as well as assesses the balance of knowledge, capacity, diversity and experience of the Board and compliance with the suitability requirements of its members.

Full details on the composition, functions and operation of the General Meeting, the Board of Directors and the specialised Committees can be found in both the Articles of Association and their operating regulations, which are available in the "corporate information" section of Cecabank's corporate website<sup>2</sup>.

In addition, Cecabank has a Management Committee which is responsible for deciding on matters submitted directly to it by the Board of Directors, or those matters submitted by the General Manager prior to their approval by the Board of Directors, as well as approving the rules of conduct and internal regulations of the entity which are not the responsibility of the Board of Directors. This Committee, made up of the entity's senior management, is chaired by the General Manager, with the Secretary General of the Board of Directors acting as Secretary of the Committee. However, its meetings may be attended, with the right to speak but not to vote, by other employees of the entity who are required by the Chairman of the Committee.

## 01D. Risk Management

Cecabank's Board of Directors is ultimately responsible for the risks that the Entity assumes in the performance of its activities. Thus, it is this body that determines the general policies regarding risk assumption. Likewise, this body is the promoter of the corporate risk culture aimed

at ensuring efficient internal control systems and rigorous and complete risk management and measurement processes.

The risk management philosophy is based on rigorous criteria of prudence, in a manner

<sup>2</sup> <https://www.Cecabank.es/sobre-nosotros/>

consistent with the commercial strategy and aims to ensure efficient use of the capital assigned to the business units. The results of applying this philosophy translate into a conservative risk profile, where high levels of solvency and a comfortable liquidity situation stand out.

The information on the Bank's risk policy is expanded in: the Organizational Structure and Governance Practices report, the Entity's Consolidated Management Report, the Information of Prudential Relevance (IRP) report and the General Control Framework, available on the corporate website<sup>3</sup>.

The entity has a risk management and control model based on three lines of defense and has established processes for the identification, prevention, mitigation and control of financial and non-financial risks that are material to the entity.

Cecabank's wholesale approach focuses on serving professional customers with a high degree of sophistication in their activity, with long-lasting relationships of mutual trust. In this framework, the management and control of non-financial risks are fundamental aspects.

## Management and control of non-financial risks

The participation of Senior Management in risk processes is articulated through a structure of Committees appointed by the Board of Directors. Specifically, the Compliance and Operational Risk Committee is the body of the entity through which this is structured. participation in the

management, monitoring and control of non-financial risks and in the development and implementation of risk policies that ensure the maintenance of the approved risk profile. For the development of its functions, it has support units for different committees, among which is the Committee for the Prevention of Money Laundering and Financing of Terrorism or the Tax Committee.

For its part, there is a Corporate Conduct Committee whose function is to ensure the proper functioning of the communication channel established in matters related to the Code of Corporate Conduct. This committee, which reports at least annually to the Audit Committee, informs to the Compliance and Operational Risk Committee, when from the analysis and resolution of the complaints it is determined that there has been an event of loss of operational risk, as well as the operation of the complaints channel from the point of view of criminal risk, its state of processing and the final result of the actions carried out.

The entity incorporates within the risks identified in its Risk Tolerance Framework the risks related to sustainability, thus committing itself to the achievement of objectives linked to responsible and sustainable management and ethical and transparent behavior, against gender inequalities, and in favor of reconciling work and family life.

These sustainability objectives are incorporated as part of the credit risk admission analysis of customers and counterparties and of the supplier analysis process, validating that they share Cecabank's ethical, social and environmental values.

<sup>3</sup> <https://www.Cecabank.es/sobre-nosotros/>

The entity has established different mechanisms for the control and management of non-financial risks. In this way, the following stand out:

Non-financial risks	Main control and management mechanisms
 <p data-bbox="161 584 344 640"><b>Social and governance risk</b></p>	<ul style="list-style-type: none"> <li data-bbox="499 454 1426 539">◉ Cecabank has a Corporate Social Responsibility Policy that it develops through its own Sustainability Plan and compliance with which is reported through the Sustainability Committee.</li> <li data-bbox="499 555 1426 719">◉ The entity promotes ethical and transparent behavior and seeks equal opportunities between men and women. To this end, it has an Equality and Diversity Policy whose objective is to promote the presence of the underrepresented sex in decision-making positions or functions, improving the possibilities for women to access positions of responsibility, reducing inequalities and reconciling family and work life.</li> <li data-bbox="499 734 1426 1014">◉ Internal and external reporting procedure. In this sense, Cecabank prepared in 2021 the Control Framework for the State of Non-Financial Information so that the information flows in a more agile and structured manner, developing and leaving evidence of the internal control mechanisms that ensure the reliability and consistency of the information. In this Framework, the Entity established three levels of control in the contents of the Non-Financial Information: the Sustainability department, responsible for preparing the Report, a secondary control carried out by the Transversal Risks and Coordination Unit, integrated within the area of Risks and Compliance and a tertiary control carried out by Internal Audit.</li> </ul>
 <p data-bbox="161 1211 464 1290"><b>Risk related to compliance and prevention of corruption and bribery</b></p>	<ul style="list-style-type: none"> <li data-bbox="499 1077 1426 1240">◉ The entity has implemented and maintains a Criminal Risk Organization and Management System, which has specific internal regulations, made up of a Criminal Compliance Policy, a Backbone System Document and a Roles and Responsibilities Document. Said System was certified by AENOR in 2018 in accordance with the UNE 19601 standard for criminal compliance, having renewed said certification in December 2021 until 2024.</li> <li data-bbox="499 1256 1426 1368">◉ Among others, all social initiatives carried out by the entity, which entail a disbursement of funds, are subject to the necessary control mechanisms in order to ensure compliance with internal and external procedures and regulations in the operational field, safeguarding of assets and accounting financial information.</li> </ul>
 <p data-bbox="161 1659 360 1693"><b>Reputational Risk</b></p>	<ul style="list-style-type: none"> <li data-bbox="499 1487 1426 1644">◉ Aspects related to sustainability form part of the areas of risk identified by the Entity within the reputational risk analysis of clients. The entity incorporates the analysis of public information on potential Cecabank customers, such as the existence of a Sustainability Plan, its organizational structure in this field or the offer of responsible products and services.</li> </ul>
 <p data-bbox="161 1899 384 1933"><b>Environmental Risk</b></p>	<ul style="list-style-type: none"> <li data-bbox="499 1727 1426 1861">◉ In 2021, Cecabank continued to work on analyzing how climate change and the transition to a low-emissions economy can generate risks that need to be managed, not only as a new type of risk but also as a manifestation of the risk categories already existing, seeking its integration within the risk management carried out from the different risk units of the Entity. To this end, it continues to develop a roadmap for the definition and management of environmental risks, following the expectations of the Bank of Spain.</li> </ul>



## 01E. Our commitment to sustainability

Both because of its strong banking tradition linked to the social dimension, and because of its vocation for the future, Cecabank is aware of the importance of carrying out its business considering ESG (Environmental, Social and Governance) factors. These considerations are part of the national, European and international economic agenda and Cecabank wishes to actively contribute.

The Entity's Sustainability is structured around 4 pillars:



**01**  
The governance model in sustainability, which raises these aspects to the highest level of the organization.



**02**  
The Sustainability Policy, aligned with the Entity's values.



**03**  
The Sustainability Plan, which governs the actions to be carried out within the defined strategic horizon.



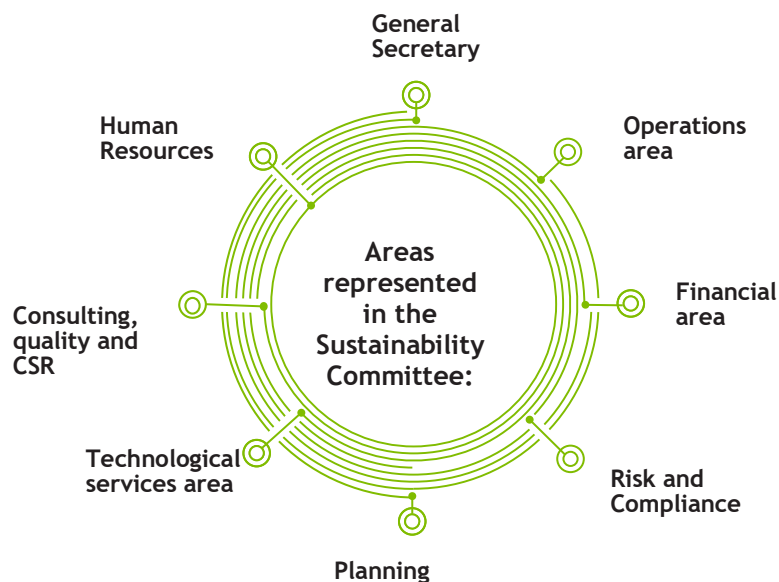
**04**  
Our Alliances to achieve the objectives

### Sustainability Governance

To carry out these objectives, the Entity has an organizational structure that facilitates the development of the defined lines of action. Following the best practices in the matter, Sustainability is at the highest level of the organization, being the responsibility of the Board of Directors, which delegates this function to the Audit Committee.

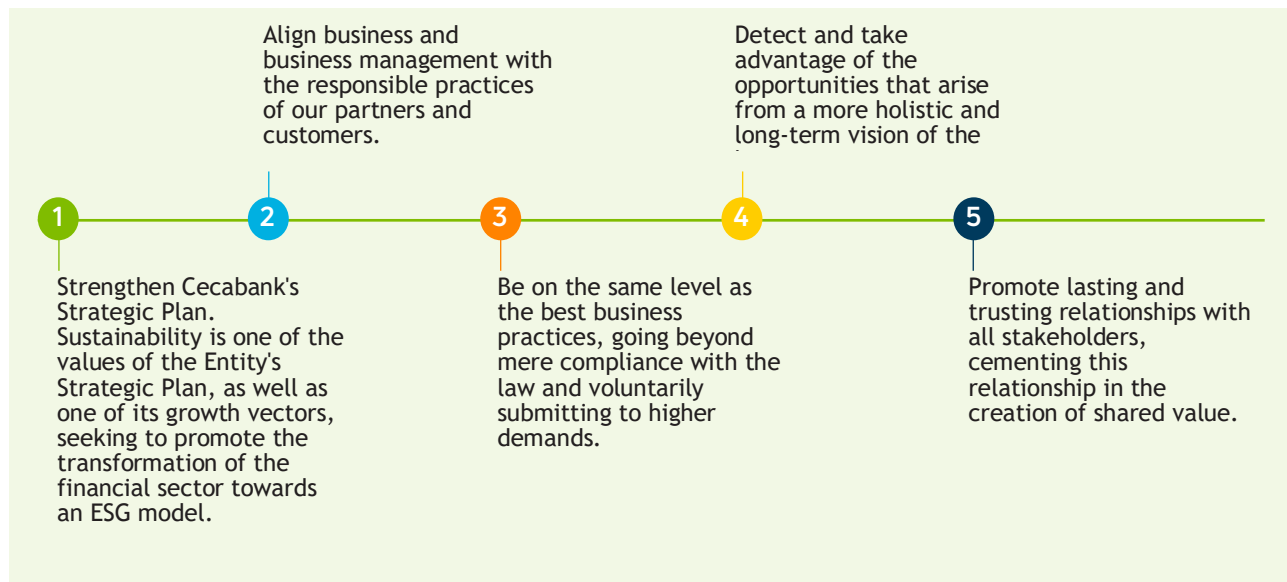
At an operational level, Cecabank has a Sustainability Committee, which reports directly

to the Management Committee and is in charge of defining the specific initiatives in this area, as well as monitoring them. All areas of the Entity are represented on this Committee and the Department of Sustainability and Stakeholder Relations is responsible for its secretariat. The Committee meets periodically and during 2021 it met twice, in the first and second semesters of the year.



## Sustainability Policy

In 2019, the Entity's Board of Directors approved its Sustainability Policy, the objective of which is to identify the areas of action that contribute to creating lasting relationships with our stakeholders, so that value creation can be maximized. In terms of sustainability, the Entity's objectives are:



## Sustainability Plan

In 2021, the Entity extended its 2018-2020 Sustainability Plan, until the new Strategic Plan is drawn up. The lines of action for the 2021 financial year were structured around the three areas of sustainability:



### Social

- You Choose Project
- Social action campaigns, donations and aid.



### Environmental

- Integration of climate risks in the management of Cecabank.
- Environmental management system
- Environmental footprint management, including calculation, reduction and compensation.



### Government

- Improvements in the Non-Financial Reporting framework.
- Materiality Study
- Work session with Forética

In 2021, Cecabank has begun work on defining its new Sustainability Plan, which will be aligned with the 2022-2024 Strategic Business Plan that the Entity approved at the end of 2021.

To this end, the Entity worked on updating its materiality study. This study has made it possible to identify and prioritize the most relevant social, environmental and governance aspects for its

business and stakeholders in the current context. This analysis process has made it possible to establish the priority focuses of action in line with best practices, regulatory requirements and standards, sector trends, as well as ensuring the alignment of ESG aspects with business objectives.

As a result of this process, 15 relevant topics have been obtained, structured in four blocks (People, Planet, Prosperity and Governance), on which the entity is currently working from a strategic perspective. Throughout 2022, Cecabank will prepare its new Sustainability Plan, linked to the Strategic Plan, with specific actions in these matters.

## Our alliances and commitments

The 2030 Agenda for Sustainable Development of the United Nations sets the objectives for 2030 and proposes solutions to priority global problems, establishing as a framework for action 17 Sustainable Development Goals (SDG) and 169 specific goals.

Cecabank is firmly committed to achieving the SDGs. The materiality analysis carried out in the year has allowed the Entity to review its alignment with these objectives. Cecabank maintains a strong commitment to objectives 8 and 9 to promote inclusive and sustainable economic growth, betting on decent work and innovation. Additionally, SDGs 4, 5, 7, 10, 13 and 16 stand out.



In response to SDG 17, Cecabank has built a network of alliances in which it contributes to achieving its sustainability goals. With these alliances, Cecabank seeks to contribute to the collective debate, participate in issues on the financial sustainability agenda (both national and international) and promote platforms for exchange and dialogue.

In 2021 the Entity has been part of the following initiatives:



**Pacto Mundial**  
Red Española

**Global Compact** (through the Spanish Global Compact Network): In 2021, in addition to the commitment to the Global Compact and its 10 principles, work has continued to disseminate the 17 United Nations Sustainable Development Goals, as well as pursuing a grand global pact to end the pandemic and foster a sustainable economic recovery.



**Spainsif:** This is a non-profit organization that promotes Socially Responsible Investment (SRI), promoting corporate responsibility, the integration of environmental, social and good corporate governance criteria through dialogue between different groups.



**Forética:** Association of companies and professionals of corporate social responsibility and sustainability that operates in Spain and Latin America, whose mission is to promote the integration of social, environmental and good governance aspects in the strategy and management of companies and organizations.

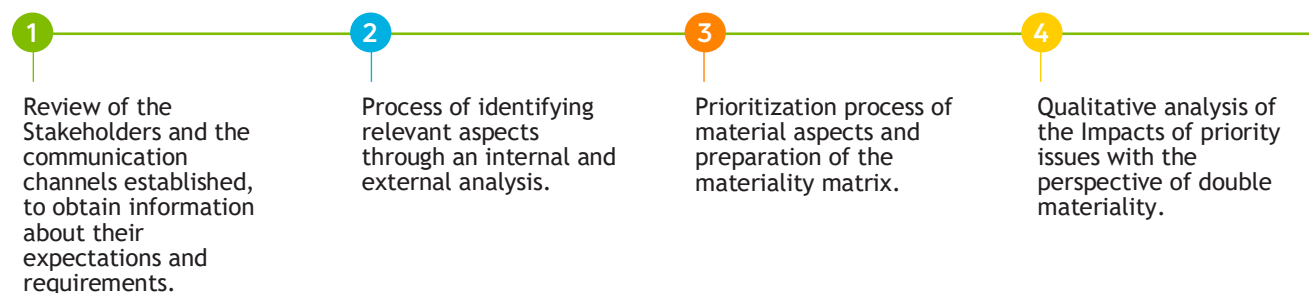
In addition, the Entity has committed itself to various initiatives in the matter:

- ⦿ Cecabank has joined the "Declaration of Business Leaders for a Renewed Global Cooperation" at the invitation of Sanda Ojiambo, who in June 2020 was appointed by the Secretary General of the United Nations as the new Executive Director of the Global Compact.
- ⦿ In December 2019, during the COP 25 held in Madrid, Cecabank joined the "Collective Commitment to Climate Action" promoted by UNEP FI, in which it undertook to reduce the carbon footprint in balance sheets in line with the Agreement on Paris.
- ⦿ In 2020, Cecabank joined the Green Recovery Alliance, an initiative promoted by Pascal Canfin, chairman of the European Parliament's Committee on the Environment, which pursues a major global pact to put an end to the pandemic and foster a sustainable economic recovery.
- ⦿ Through CECA, we support the Principles of Responsible Banking of the UNEP FI.

## 01F. Materiality and interest groups

In 2021, the Entity has updated its materiality study, taking into account the new socioeconomic, sectoral and corporate context in sustainability.

This study has been carried out with its own methodology, in accordance with the guidelines of the GRI (Global Reporting Initiative) standard, as well as other best practices and recommendations on the matter. This work methodology has been structured into 4 processes:



## Review of the Stakeholders and communication channels established

Maintaining fluid dialogue with stakeholders is a priority for Cecabank. The Entity maintains different channels active, in order to be able to actively communicate the aspects that may be of interest to them, as well as identify the requirements and expectations that these groups may have with regarding your activity.

### External interest groups



#### Clients

Questionnaires  
Periodic meetings  
Customer Service (CS)



#### Associations

Participation in sectoral associations, working groups and with third sector organizations



#### Providers

Suppliers portal



#### Public administrations

Institutional Communication Channels



#### Society

Media and Social Networks

### Internal interest groups



#### Human team

Employee surveys  
Interviews “the voice of the Management”  
EFR Questionnaire  
Intranet, newsletters and other communications



#### Associates

Periodic meetings



#### Advisers

Committees and Commissions held



#### Shareholders

Shareholder’s meeting  
Strategic business plan

The materiality study has taken into account the priority stakeholders and the dialogue channels established in the process of identifying sustainability aspects.

## Identification process of relevant aspects

Cecabank has carried out an internal and external analysis process, seeking to maintain a medium-long-term<sup>4</sup> perspective in identifying the relevant aspects, trends and commitments. To this end, the following has been analysed:

Internal documentation related to:

- ◉ Cecabank's Strategy, where sustainability is positioned as one of the Entity's growth vectors.
- ◉ The commitments assumed by the Entity in ESG matters with stakeholders through policies, codes, regulations and work procedures, as well as the mission, vision and values that define and describe Cecabank's behavior.

- ◉ Results of communication processes with stakeholders: Questionnaires, interviews, Committees, among others.

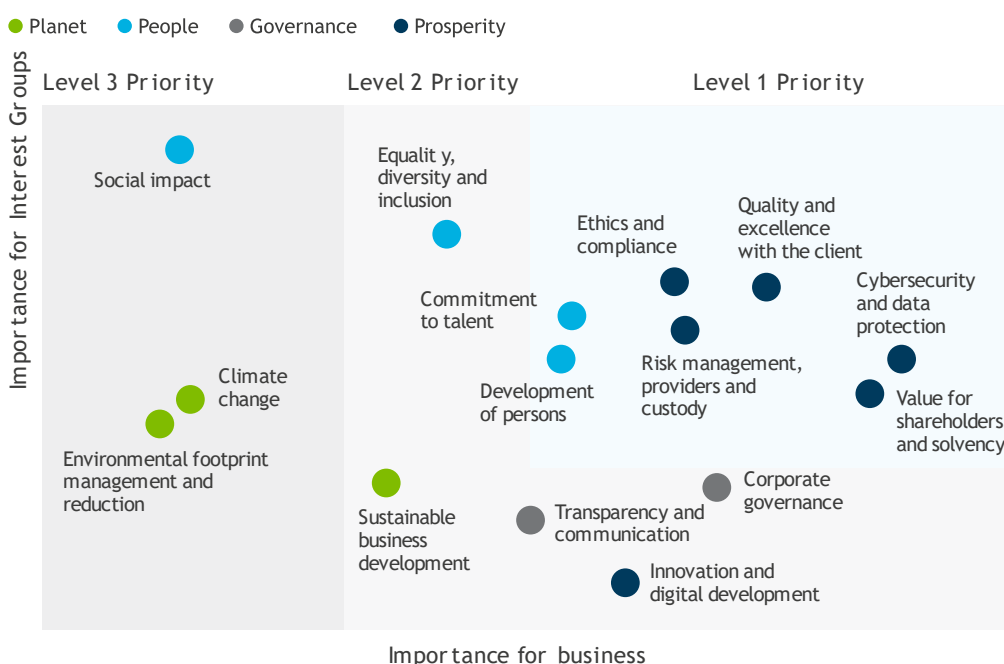
External documentation in relation to:

- ◉ Demands for ESG information and transparency: Sustainability Standards, Analysts, media analysis, among others.
- ◉ Sector trends in sustainability and best sector practices.
- ◉ Regulation on sustainable finance and sustainability.

After this analysis, Cecabank obtained 15 relevant topics, all of them aligned with sector trends and Cecabank's strategic objectives.

## Prioritization process of material aspects and preparation of the materiality matrix

After the identification process, Cecabank prioritized the material aspects from an external perspective, based on the information analyzed for the stakeholders, and internal, for which different key areas in the field of sustainability were interviewed, as well as members of the Senior Management, The results of the preparation process have been collected in the materiality matrix, which prioritizes the 15 aspects on 3 levels.









<sup>4</sup> Depending on the availability of information

The materiality matrix shows that all the material issues identified are of high importance for the Bank and its stakeholders, with Priority 1 issues being those related to the strategic aspects of generating value for customers and shareholders, positioning as trusted third party before the new regulatory and risk management framework, as well as the attraction and retention of diverse, specialized and committed talent.

## Qualitative analysis of the Impacts of priority issues with the perspective of double materiality

Cecabank has taken a further step in aligning itself with the best reporting practices, analyzing the priority issues from a dual-impact perspective: Impact of the social and environmental setting on Cecabank "Outside-in perspective" and Cecabank's impact on the environmental and social environment "Inside-out perspective".

Material issues Priority 1	Impact of the social and environmental setting on Cecabank	Cecabank's impact on the environmental and social environment
<p>Cybersecurity and Information Protection</p>  	<p>The protection of information and cybersecurity are key to ensuring business objectives and positioning with stakeholders, generating trust in regulators, investors, customers and society.</p> <p>Maintaining the high level of performance of Cecabank and given the rapid evolution of these aspects, requires permanent investment in new cybersecurity solutions and training for the specialization of the human team.</p>	<p>The Entity's good performance in these aspects has a direct impact on stakeholders, since it allows Regulators, Clients, Associates, etc., to maintain their trust in Cecabank and protect their interests.</p> <p>For their part, employees and suppliers perceive a high level of demand and need for specialization.</p> <p><a href="#">Impact on SDGs 8 and 9.</a></p>
<p>Shareholder Value and Solvency</p>  	<p>Generating value and maintaining the trust of customers and shareholders is essential for Cecabank and therefore one of its strategic objectives is to maintain a high degree of solvency.</p>	<p>Maintaining a good performance of this aspect has an impact on all the Entity's stakeholders, generating value and wealth and security in them.</p> <p><a href="#">Impact on SDGs 8 and 11.</a></p>
<p>Quality and Excellence with the Client</p>  	<p>For Cecabank, the satisfaction of its customers is a priority. The good performance in this aspect has made it possible to retain and increase the customer base, favoring lasting relationships and trust. However, maintaining the current level requires investment in innovation, training and execution of continuous improvement plans.</p>	<p>Offering a service based on excellence to customers has a direct impact on building long-term relationships and meeting their demands.</p> <p>In the rest of the interest groups, the impact on shareholders stands out, where quality and excellence translate into greater profitability.</p> <p>For their part, employees and suppliers perceive a high level of demand and need for specialization.</p> <p><a href="#">Impact on SDGs 8 and 17.</a></p>
<p>Ethics and Compliance</p>   	<p>Cecabank applies the highest standards of good governance, ethics, compliance and responsibility, both among the professionals that make up the Entity, and in relations with its stakeholders. This allows lasting relationships to be established, based on trust. Additionally, it minimizes risks reputational and criminal, which are already contemplated by the Entity in its risk model.</p>	<p>Maintaining the corporate requirements in terms of Ethics and compliance generates relationships of trust with the Entity, since the stakeholders identify the alignment with their values and objectives.</p> <p>We highlight employees, who improve their feeling of belonging. In addition, this behavior has an impact on the increase in value for shareholders, since the probability of the occurrence of criminal and/or reputational risk events is reduced.</p> <p><a href="#">Impact on SDGs 8, 10 and 16.</a></p>

**Material issues  
Priority 1**

**Impact of the social and environmental  
setting on Cecabank**

**Cecabank's impact on the environmental  
and social environment**

Risk management, suppliers and custody

Proper management of these aspects allows maintaining a stable, recurrent structure of results and oriented to the preservation of value in order to guarantee the orderly growth of the Entity in the long term, as well as maintaining adequate capital planning and maintenance of resources. to meet its commitments in the short and long term, otherwise, the materialization of unmanaged risk events could lead to a reduction in performance.

The management of this aspect has a direct impact on the shareholder, since proper risk management provides security and protection of their capital.

For other interest groups such as employees or society, this translates into greater job stability and wealth generation.

[Impact on SDGs 8, 12, 16 and 17.](#)



Commitment to talent

Cecabank maintains relations with its employees that favor integrity, respect between people, health and safety at work, professional development, equal opportunities and non-discriminatory treatment, among others. These aspects and the working conditions that offered to the Entity's employees allow for a low turnover rate and, therefore, greater operational efficiency, reducing the costs associated with recruitment and training.

Cecabank employees have advantageous working conditions in aspects such as finance, life insurance, health care policy, conciliation, among others.

The retention of talent, in turn, ensures good financial results for shareholders and a higher level of service, as a result of high levels of employee satisfaction.

[Impact on SDGs 3, 5, 8 and 10.](#)



People development

Cecabank includes the specialization of its human team as one of its corporate values. To this end, it carries out training plans, betting on participation in multidisciplinary projects, favoring the attraction and retention of clients.

Actions in relation to this aspect have a direct impact on Cecabank employees, allowing them to grow professionally and providing them with the tools to achieve their professional goals.

In turn, specialization favors greater profitability derived from better results and an improvement in the level of service perceived by customers.

[Impact on SDGs 4, 5, 8 and 10.](#)





## 02. Our customers

Customers are the *raison d'être* of Cecabank's business, which aspires to maintain lasting, long-term relationships with each one of them. For this reason, Customer Orientation and Specialization form part of the Entity's corporate values. This implies that the Entity is in permanent contact with customers to detect their priorities and anticipate their needs, seeking to offer products with high added value.

In 2021, Cecabank has provided services to more than 300 clients, including traditional financial institutions and new players, managers, insurers, large corporations, and public administrations,

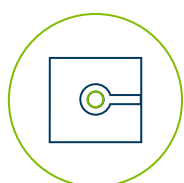
spreading the culture of customer orientation and continuous improvement throughout the organization.

The company governs its business relationships under criteria of quality and transparency and its priority is to meet customer expectations, in order to build loyalty and attract new users. Customer diversification is one of the objectives defined in Cecabank's 2017-2020/21 Strategic Plan, completed this year. This challenge at Cecabank is addressed from different business areas with the aim of maximizing opportunities, highlighting:

### 02A. Business diversification

Cecabank's business is made up of three independent but complementary lines -Securities Services, Treasury and Banking Services<sup>5</sup>-, seeking to diversify income and customers. The Entity makes available to its clients a range of services with a high component of specialization and innovation and works continuously to identify new products and services that may be of interest to current and potential clients.

At the end of 2021, the contribution to the gross margin of the Entity's 3 core business lines shows a diversified picture of income from services. Said diversification allows the Entity to be resistant to economic cycles and this has been demonstrated in the last nine years, since the Entity was created.



**52%**

Securities Services



**27%**

Treasury



**21%**

Banking Services

Additionally, it is worth highlighting the Entity's progress in terms of Sustainable Finance. In this sense, Cecabank has operated in 2021 with 54 references considered "green", both in governments and in corporate debt.

Among them, the SPGB 1% 07/42 stands out, the first green bond of the Spanish Treasury, of which

5,000 million euros were issued in a syndicated issue in September 2021 and which had a demand for more than 60,000 million euros.

Also noteworthy is the EU issue within the NGEU program of a green bond to 2037, the first bond of this type from the pan-European issuer, which had a record demand of more than 135,000 million

<sup>5</sup> In accordance with the 2022-2024 Strategic Plan, the entity's three Core lines are Securities Services, Treasury and Payments.

euros and for which it has just reopened in ordinary auction 2,500 million more. In this recent auction we have bought 5 million euros of this green bond that we have in our portfolio.

In total, Cecabank has carried out 302 operations, mostly from the Spanish syndicate, for an

aggregate global amount of 1,134.42 million euros.

The position of the Credit Portfolio in ESG (Environmental, Social & Governance) bonds at the end of 2021 is eleven positions with a total amount of 113 million euros (88 million of private debt and 25 million in Regions).

## 02B. Client diversification

Cecabank provides services to financial entities, managers and Investment Services Companies, Large Corporations, Venture Capital Managers, Insurance Companies, Securities Companies and Agencies, Fintech and Public Administrations with a differential service offer.

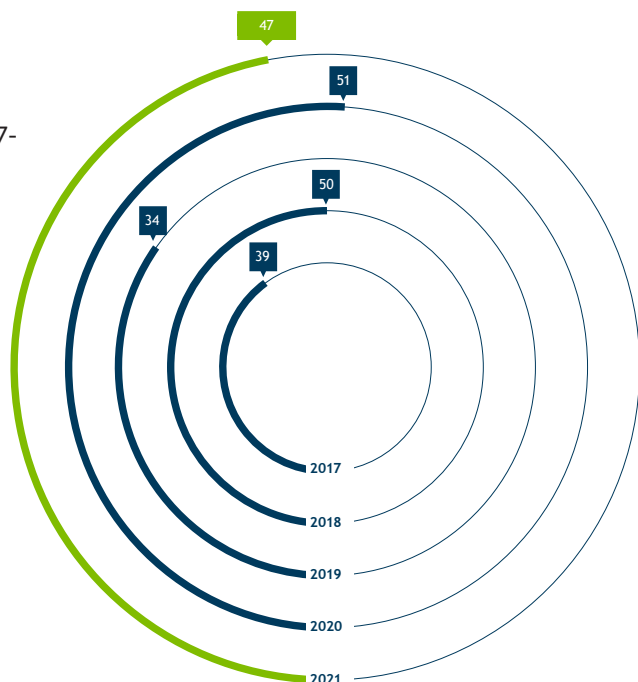
Every year, the Entity defines its commercial objectives, integrating them in the Strategic Plan and monitoring them by senior management. Within these objectives, the number of new customers stands out, for which the Entity carries out monthly monitoring. This monitoring is carried

out by the Strategic Coordination team, who is in turn responsible for transferring its evolution to the Commercial Committee, the Management Committee and the Board of Directors.

A new customer is understood to be one who has not had any relationship with Cecabank in the last three years. The acquisition of new clients in the 2017-2021 period has been very significant, reaching 221 new clients and has made it possible to counteract the departure of clients, especially motivated by changes in the sector. Below is the breakdown by year:

**221**

new clients in the period 2017-2021



## 02C. Segment diversification

Cecabank's customer portfolio differentiates 4 large sectors of activity, on which the distribution of customers and opportunities is monitored.



### Associates

Entities associated with CECA.



### Banks

Both national and international.



### Investment managers

Insurance companies and investment services companies (ESIs)



### Rest

Including the public sector, corporates, fintechs and technology companies, among others

In order to establish long-lasting relationships with its customers, Cecabank focuses on establishing long-term agreements, both in the field of depository, with agreements that cover different periods, and in Banking Services in means of payment contracts, support platforms for treasury and risks, technological outsourcing and electronic banking.

The Entity has continued to work in 2021 on three main work focuses:

- ⦿ **Quality Management Systems:** Maintenance and implementation of management systems for continuous improvement in those areas where certification provides a differential value.
- ⦿ **Measurement and Analysis of the Voice of the Customer:** To understand their needs and expectations, so that these are taken into account when making decisions.
- ⦿ **Improvement Plans:** aimed at achieving the Entity's strategic objectives in terms of

customer loyalty and the establishment of long-term relationships:

- a. Improving the quality of our processes.
- b. Improve customer experience.

As a result of the advances in these areas of work, the following improvements have been made:

- ⦿ During 2021, the certification of the Financial Reporting Services-Pyramid and that of the Banking Training School have been renewed and the rest of the certifications of the Securities and Depository Services and Collections and Payments have been maintained, all of them under the criteria of the ISO 9001:2015 standard.
- ⦿ During the year, Cecabank has renewed the certification of the Information Security Management System according to the UNE-ISO/IEC 27001:2014 STANDARD for SEPA debit and transfer services. This certification is valid until 2024 and guarantees the continuous improvement of the Entity in terms of

assurance, confidentiality and integrity of data and information, as well as the systems that process it.

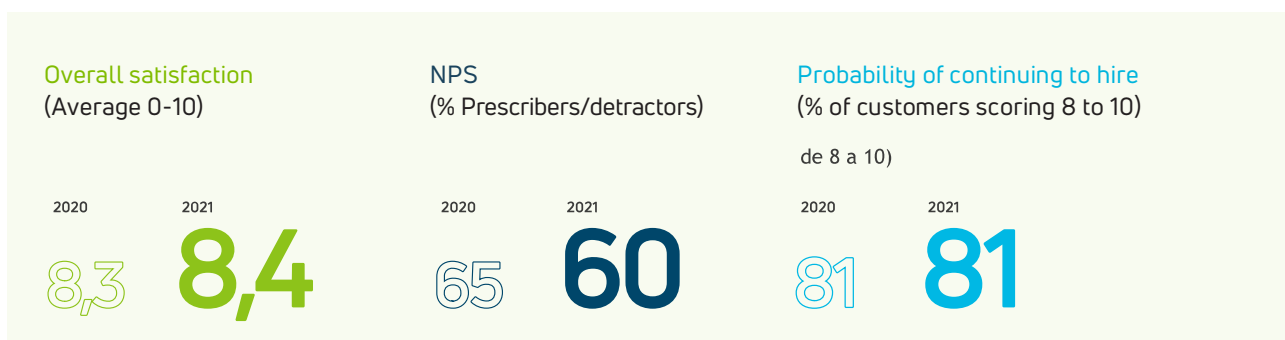
- ⦿ In the four areas certified according to the ISO 9001:2015 standard, continuous improvement and the development of the principles of the standard have been deepened beyond compliance with the requirements of the standard itself, as well as the simplification of flows of work and the adoption of agile methodologies.
- ⦿ Support has been given and the certification of other certified management systems has been renewed for all Cecabank until 2024.
  - a. Penal Compliance Management System certified in accordance with the standard UNE 19601:2017.
  - b. Energy Management System certified according to ISO 50001:2018.
- ⦿ The management of the three identifications (Identification of Compliance Measures, Identification of Extraordinary Measures and Identification of Solidarity Action) of "Madrid Guarantee" for Cecabank has been coordinated for the measures adopted, the extraordinary

commitment shown and the solidarity activity carried out in the prevention and minimization of the risks caused by COVID-19.

- ⦿ The measurement of Cecabank's greenhouse gas (GHG) footprint has been systematized and optimized, with the corresponding measurement for 2020 verified by AENOR in accordance with the ISO 14064-1:2012 standard.
- ⦿ Support has been given to Talent Management to obtain the EFR certification for a Family-Responsible Company.
- ⦿ The evaluation process of the quality of service provided by suppliers is managed in an integrated manner with the corporate approval and evaluation processes.
- ⦿ The development and implementation of the customer experience measurement model has been deepened, seeking to delve into the customer corridor defined and validated with our customers in order to achieve perfectly adequate improvement plans for each Service.

The information obtained has been used as a tool for improving the different businesses through specific actions and the detection of needs.

The satisfaction index, the recommendation index and the willingness to continue trusting Cecabank for new solutions are shown below:



In addition, Cecabank has a Customer Service system in accordance with Order ECO/734/2004 of 11 March 2004 on Customer Service Departments or Services and the Customer Ombudsman for financial institutions. During the year 2021, only 1 claim was received, which was not admitted for processing because it was not within its competence. In 2020, 2 claims were received, of which none were admitted for processing.

It should be noted that Cecabank voluntarily assumes the highest demand standards and all the recommendations in terms of technological risk assessment (ICT) proposed by the EBA, including in its scope the risks of security, cybersecurity, change, integrity, continuity and outsourcing, all of them included in the risk management policy. Likewise, the services offered by Cecabank are largely based on high and sophisticated technological support that guarantees data privacy and business continuity.

## 03. Management of people

### 03A. Our employees

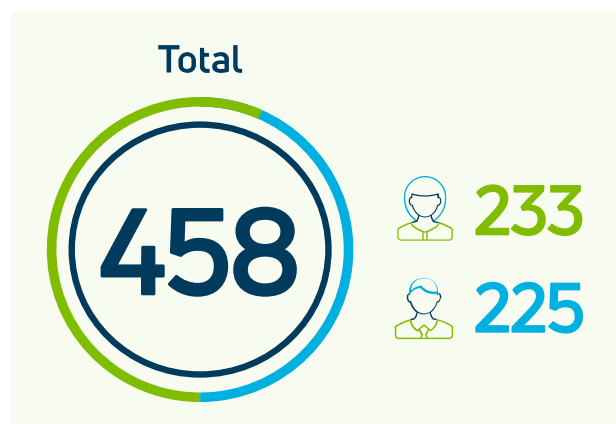
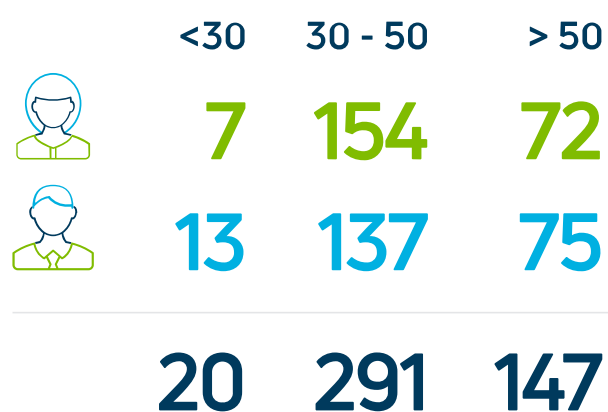
One of the lines of action defined in the Cecabank Sustainability Plan is responsible and sustainable management of talent. The different policies related to the management of professionals establish the principles of equality, integration and non-discrimination in the workplace.

At the end of the 2021 financial year, Cecabank had 458 employees in Spain and 3 in the foreign branch network (1 employee in Frankfurt, 1 employee in London, and 1 employee in Lisbon).<sup>6</sup>

Cecabank's 470 employees in Spain are distributed as follows:



Distribution by age and level



<sup>6</sup> In the report of the other indicators of the Non-Financial Information Statement related to the section "Our employees", the data related to the employees of the offices located outside of Spain, which represent only 0.6% of the total, have been

excluded. of Cecabank employees. Likewise, the 2 Trionis employees are not included.

Professional levels	Female	Male	Total
GROUP 1 - LEVEL I	3	5	8
GROUP 1 - NIVEL II	2	3	5
GROUP 1 - LEVEL III	12	17	29
GROUP 1 - LEVEL IV	12	30	42
GROUP 1 - LEVEL V	30	31	61
GROUP 1 - LEVEL VI	46	52	98
GROUP 1 - LEVEL VII	41	28	69
GROUP 1 - LEVEL VIII	51	25	76
GROUP 1 - LEVEL IX	15	10	25
GROUP 1 - LEVEL X	7	7	14
GROUP 1 - LEVEL XI	4	3	7
GROUP 1 - LEVEL XII	10	10	20
GROUP 2 - LEVEL I	-	1	1
GROUP 2 - LEVEL II	-	2	2
GROUP 2 - LEVEL IV	-	1	1
<b>Total</b>	<b>233</b>	<b>225</b>	<b>458</b>

All Cecabank employees have an indefinite contract and 98.7% work full time<sup>7</sup>.

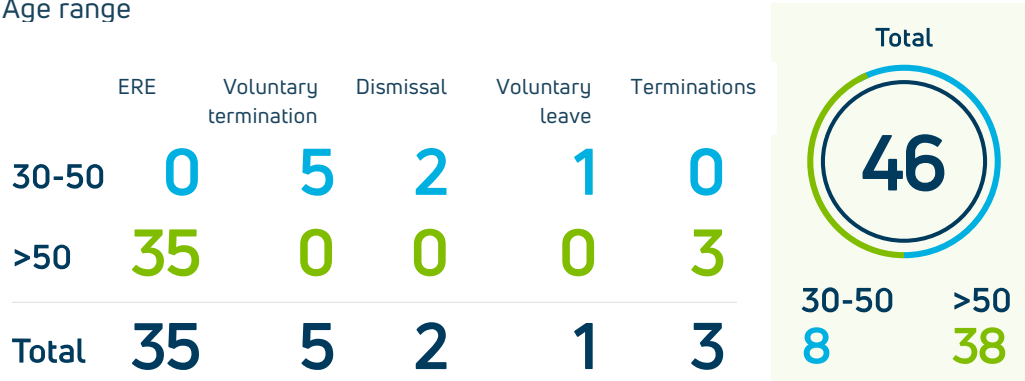
During 2021, there have been 46 casualties, of which 2 were dismissals. The 2 dismissals are

broken down into a man and a woman, one from group IV and the other from VIII, both with an age range of 30 to 50 years. During 2021, there have been 33 new employee registrations, thirteen women and twenty men.

### Gender



### Age range



<sup>7</sup> The Director is linked to the Entity by a commercial contract not subject to labor legislation.

**Additions**

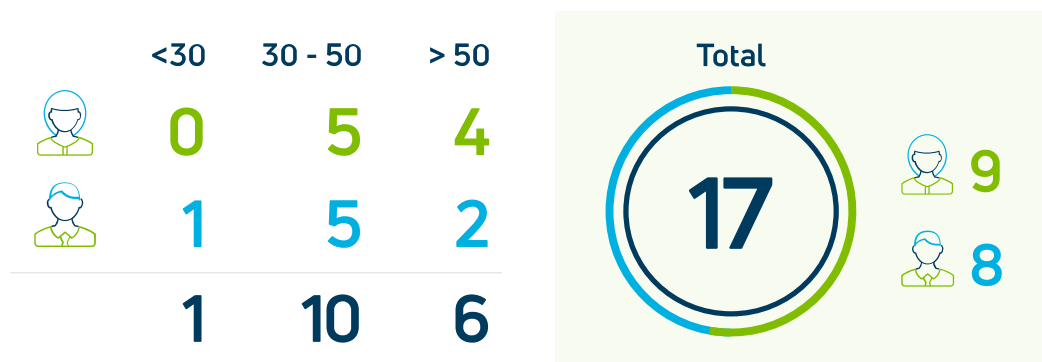
Group and level	< 30	30 - 50	Total
Group 1 - Level.I	-	1	1
Group 1 - Level.IV	-	1	1
Group 1 - Level.VI	-	1	1
Group 1 - Level.VII	-	2	2
Group 1 - Level.VIII	-	3	3
Group 1 - Level.X	1	3	4
Group 1 - Level.XI	3	-	3
Group 1 - Level.XII	13	4	17
Group 2 - Level.IV	1	-	1
<b>Total</b>	<b>18</b>	<b>15</b>	<b>33</b>

The Entity launched the CRECE+ Plan in 2021, continuing with the Human Resources Transformation Plan within the 2017-2020 Strategic Plan, where different lines are integrated with the aim of advancing in the different phases of the Human Resources management cycle, favoring the professional growth and development of its employees, giving them the opportunity to discover new ways of working, acquire knowledge in different areas and enhance their internal employability.

The incorporation of new talent, with 33 incorporations, has been one of the objectives of the year, managing to capture and integrate new versatile and digital profiles, with skills and competencies that guarantee: excellence, innovation, commitment and enthusiasm.

During 2021 there have been 17 internal movements in the Entity:

**Internal movements**



**03B. Equality**

Cecabank has a Plan for Equality between women and men and reconciliation of family and work life. In the years following 2017, the date of its modification, detailed studies have been carried out on equality (salary gap, update of the situation diagnosis and conciliation measures) and work has been done on training actions on diversity for the entire workforce.

The Equality Plan regulates the functions of the Equality Commission, establishes positive action measures and collects the improvements that have been agreed between the labor representation of the workers and the Entity.

On the other hand, Cecabank has a Protocol for actions in the event of complaints of workplace

harassment, sexual harassment and harassment based on sex at Cecabank. It is a labor agreement signed with the entire labor representation of the workforce and regulates, for the first time, workplace harassment.

The main objectives of the Equality Plan are the effective application of the principle of equality between women and men, promoting the presence of the underrepresented sex in decision-making positions or functions, improving the possibilities of access for women to places of responsibility, the reduction of inequalities and the reconciliation of family, personal and work life. In addition, it guarantees training plans that equally facilitate the development of skills and competencies without distinction of gender.

Cecabank also has the following agreements in this area:

- ⦿ Labor agreement on teleworking and the right to digital disconnection.
- ⦿ Hourly flexibility agreement
- ⦿ Inclusive language practical guide
- ⦿ Guide to measures, aid and benefits.

Within the action plan to obtain recognition in this area, work has been done to obtain the EFR Certificate (Family-Responsible Company) granted by the Fundación Másfamilia, obtaining the concession in 2021.

Cecabank has also adhered to the Diversity Charter (Fundación Diversidad) and the Empowering Women's Talent programme.

The Entity, due to the enrichment in its selection processes, has people with different abilities both in its staff and in the selection of ETTs. Currently, there are three people with different abilities providing services through the ETT and two people who have joined the staff. In 2020, Cecabank had 1 woman on its staff and 5 people to temporarily provide services to these ETTs.

### 03C. Training

Training at Cecabank is aimed at promoting specialization and the development of new professional skills. We are promoting the transformation of the Bank through new work methodologies and the acquisition of digital skills.

In line with our philosophy of continuous improvement, the training is reviewed and adapted annually to respond to the needs of the people who work at Cecabank, so that they are prepared to optimize the service to our customers and adapt to the demands of a changing market.

The Annual Development and Training Plan integrates different areas of knowledge, which cover multiple areas such as regulations and standards, finance, IT, digital skills, management, health and well-being.

During the 2021 financial year, we have continued with a training and development plan adapted to

In addition, Cecabank collaborates with entities that promote the inclusion of people with different abilities in the work environment.



Total number of employees at Cecabank Spain



Percentage of women at Cecabank Spain



the teleworking context, with a greater weight of teletraining actions and webinars through Teams, compared to face-to-face courses, which were resumed in September under the relevant security measures. Security.

For the second consecutive year, we have chosen to prioritize the emotional health of workers, using custom-made content. We have also focused on managers, providing them with training actions aimed at managing uncertainty and leading teams that work remotely, as well as skills for know how to give feedback appropriately.

At a technical level, we have worked on new programming languages and specialized training in our own subjects for the area of Risk and Compliance, Operational Services and Legal Advice.



Additionally, Cecabank has an onboarding program to welcome new hires. This program incorporates a series of mandatory and voluntary online training on aspects such as the Code of Conduct, Cybersecurity, Occupational Risk Prevention, Energy Efficiency, Equality of Gender and Diversity, among others, and a face-to-face session. In the latter, the program includes a team-building activity to work on aspects of collaboration, uncertainty management and high-performance teams.

Another novelty has been the adhesion to the Empowering Women's Talent program, whose main objective is to make the entire organization aware of the richness of having diverse staff, as well as promoting the emergence of female talent to positions of responsibility.

In addition, we have promoted in-company specialization programs by increasing the content

Below are the hours of training by professional category according to the agreement, which have meant a total of 19,509 hours in 2021:

offer, demonstrating that this approach means greater adaptation to our needs, a reduction in training hours and an increase in budget efficiency, without reducing the quality of the programs or the level of student satisfaction.

Throughout this process, we have relied on our Learning Cloud platform, which is integrated with the training website, where all the training activities carried out by the people who work at Cecabank are recorded. It also includes all this activity in its curriculum and allows those responsible to view the courses requested by their teams and the state in which they are.

In this sense, we have increased the offer of the training catalog in the areas of skills, digital competencies and health and well-being, through micro-learning content that makes students more efficient and reduces the workload of hours.

Hours of training by levels

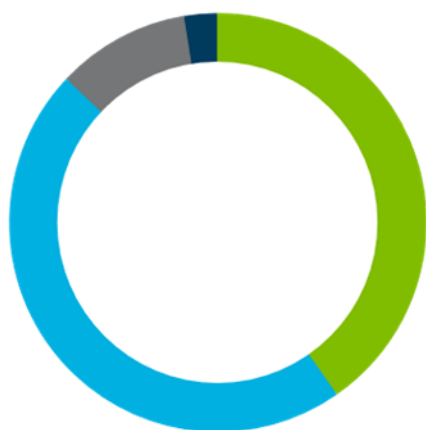
	Level I	Level II	Level III	Level IV	Level V	Level VI	Level VII	Level VIII	Level IX	Level X	Level XI	Level XII	Level XIII
Group 1	364	177	1,546	2,326	2,901	4,468	2,765	2,901	1120	387	231	272	-
Group 2	17	34	-	-	-	-	-	-	-	-	-	-	-

Indicator Description	Indicator Units	2020	2021
% of higher and intermediate university graduates (Higher Engineers, Graduates or Diplomas)	Percentage (%)	77%	77%
Employee training hours Cecabank Spain	Hours per employee	34 <sup>8</sup>	42
Investment in training for employees in Spain	Euros per employee	916 €	923 €

<sup>8</sup> Recalculated in 2021 according to adjustments in the data extraction and calculation methodology.

### Global training Assessment 2021

- Very satisfied
- Satisfied
- Dissatisfied
- Not satisfied



### NPS of Training 2021

- Promoters
- Detractors
- Passives



In total, we have increased the number of hours of training given during 2021 by 23% compared to the previous year.

In 2021 we have resumed collaboration with university centers and business schools for their students to carry out internships at our Entity, formalizing 7 end-of-degree scholarships. In

addition, we launched “the Nido Program” initiative with an excellent reception from institutions and students. A total of 9 people have joined the internship program, who will spend 9 months getting to know the Entity’s operations and participating in its daily activities, all as part of Cecabank’s commitment to promoting employment and renewing internal talent.

## 03D. Remuneration

Cecabank has a General Remuneration Policy that establishes, among other aspects, the general principles of the remuneration system, as well as its essential characteristics, the specific requirements of each group and the governance model.

For the calculation of the average remuneration of the members of the workforce, 93.89% of the Cecabank workforce in Spain has been taken into account, based on data at the end of the 2021 financial year, excluding members of Senior Management, whose data is broken down below, as well as the 20 people assigned to the Treasury and Equity Sales Divisions of the Financial Area.

Said persons have a specific variable remuneration system that could reach 200% of

their fixed remuneration and that, in accordance with prudential regulations on remuneration, is subject to deferral, payment in non-pecuniary instruments, as well as malus clauses. and “claw back”, if certain assumptions occur in accordance with the provisions of Cecabank’s General Remuneration Policy.

Below is the average remuneration\* by sex, age and level of professional category according to the agreement<sup>9</sup>:

<sup>9</sup> There are 4 employees of professional group 2 (miscellaneous trades) who have been equated to levels X and XII based on their remuneration.

### Average remuneration by gender



2020  
**73.621**

2021  
**72.767**



2020  
**59.915**

2021  
**62.333**

### Wage gap

2020  
**18,62%**

2021  
**14,34%**

Average remuneration by professional category	2020	2021
Level II	144.062 €	153.693 €
Level III	132.169 €	129.624 €
Level IV	88.680 €	92.102 €
Level V	75.820 €	76.761 €
Level VI	63.354 €	66.803 €
Level VII	57.150 €	58.824 €
Level VIII	48.405 €	52.312 €
Level IX	48.099 €	49.563 €
Level X	40.657 €	43.150 €
Level XI	33.667 €	36.249 €
Level XII	24.972 €	29.244 €

The remuneration by age groups presents the

following detail:

Average remuneration by age	2020	2021
<30	29.037 €	30.740 €
30-50	65.681 €	66.345 €
>50	68.655 €	74.563 €

Based on these same data, Cecabank has proceeded to calculate the wage gap, taking into account the average remuneration by gender. Taking this variable into account, the wage gap would be 14.34%

Average remuneration	2020	2021
Male	€ 73,621	€ 72,767
Female	€ 59,915	€ 62,333
<b>Total Average</b>	<b>€ 66,592</b>	<b>€ 67,307</b>
<b>Wage gap</b>	<b>18.62%</b>	<b>14.34%</b>

At year-end there are 10 directors at Cecabank, of which 7 are men and 3 women. The directors of Cecabank only receive, for their role as directors, income from the Entity for attendance fees both to the Board of Directors and to the Committees. The individual amount of the per diem is the same for all the directors, so the total amounts received by each director depend exclusively on the number of sessions of the governing bodies that they have attended.

In the 2021 financial year, the average amount received by each director was 31,921 euros for men and 57,242 euros for women. In the 2020 financial year, the average amount received by each director was 33,621 euros for men and 53,793 euros for women.

With regard to Senior Management, Cecabank has 8 directors, of which 5 are men and 3 are women, with the incorporation of 2 women during 2021. The average remuneration amounted to 170.53 thousand euros in the case for women and 175.68 thousand euros for men, excluding the Corporate Finance Department from the calculation given the special nature of its variable remuneration system and a manager linked to the entity by a commercial contract not subject to labor legislation.<sup>10</sup>

The representation of women in Senior Management will tend to evolve upwards in order to achieve a balanced presence of men and women, taking into account the vacancies that occur in it and in the different Board Committees.

<sup>10</sup> The comparison with the previous year is not included, since in the year ending in 2020 there was only one woman.

## 03E. Employee benefits

Cecabank offers social benefits for its employees, thereby seeking to motivate, retain and retain its workers.

The main social benefits that Cecabank offers its employees are the following:

- ⦿ Preferential financial conditions
- ⦿ Pension plan for all staff members
- ⦿ Group life insurance
- ⦿ Health care policy for staff members
- ⦿ Grants for nursery and for the training of sons and daughters of the staff.
- ⦿ Aid for the training of the worker himself
- ⦿ Christmas gift for the sons and daughters of the staff.

The investment for each worker in terms of social benefits made by the Entity in 2021 amounts to a total of 1,706.80 Euros.<sup>11</sup>

Additionally, since 2018 Cecabank has had a flexible compensation plan for its staff members that allows them to contract products and services with preferential conditions and in some cases with tax benefits, when the tax regulations so contemplate.

Currently, the products that are part of the Ckb.Flex flexible remuneration plan are the following:

- ⦿ Nursery check.
- ⦿ Training check.
- ⦿ Transport card.
- ⦿ Food card.

Medical insurance for spouses, partners and children of the employed person

The implementation of Ckb.Flex has been firmly consolidated in the workforce in such a way that 56% have at least one product contracted through the flexible remuneration system, with the total number of products contracted at the end of the 2021 financial year being 714 contracts.

The most demanded products are the following:

- ⦿ Medical insurance for family members of employees: contracted by 53% of the members of the workforce.
- ⦿ Transport card: contracted by 28% of the workforce.

As a consequence of the progressive return to normality in the activity in the provision of services in person at the Entity's facilities, there has been a notable increase in contracts for products associated with transport, as well as consumption in premises of restoration.

Likewise, among the Entity's staff, the possibility of applying this system to the financing of training actions is becoming more widely known.

## 03F. Reconciliation

Within the Human Resources Plan linked to the 2017-2021 Strategic Plan, the Bank has promoted the implementation of a system of flexible hours and teleworking.

Both aspects have been agreed upon with the labor representation of Cecabank through the signing of two labor agreements with the legal representation of the workers (RLT) present in the Entity.

Until the end of October 2021, teleworking has been predominant in the provision of services as a result of the impact of COVID-19 under the "Care for me" plan promoted by the national

government, in accordance with the provisions of the sectoral collective agreement, Cecabank has made the necessary material available to the members of its workforce, as well as an economic allocation for the provision of services in the teleworking modality.

At the end of 2021, the Entity signed a new teleworking agreement with the entire labor representation, which is already adapted to all the requirements of the Remote Work Act and which Cecabank will apply regardless of whether the teleworking modality whether or not it exceeds 30% of the working day.

<sup>11</sup> This amount is significantly lower than in previous years, to the extent that all the contributions to the Pension Plan have been financed by surpluses from the pension plan itself and have not entailed a personnel expense.

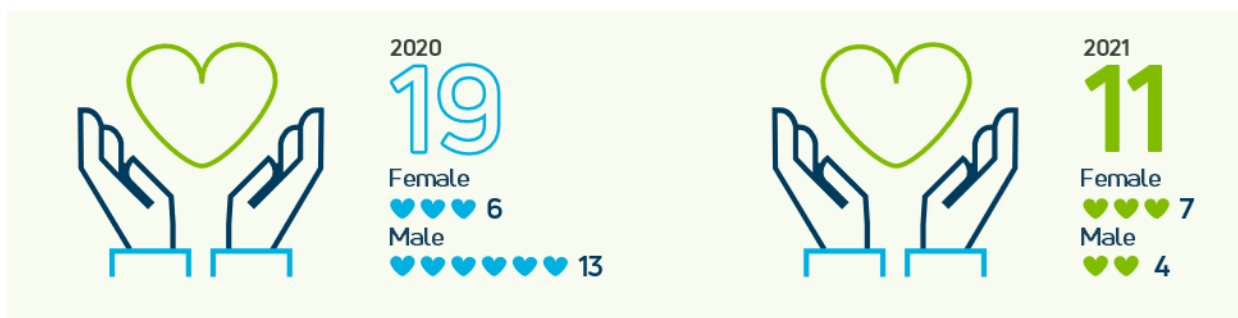
Likewise, the possibility has been considered for pregnant women to be able to telework during the entire gestation period.

Said agreement also develops the right to digital disconnection that was regulated for the first time by a collective agreement of the Savings Banks and Financial Entities for the period 2019-2023 and which entered into force on December 3, 2020.

Cecabank's work organization is based on the collective agreement of the Savings Banks and Financial Entities, improving conditions by contract and applying compensatory measures to employees with special hours through more vacations and higher remuneration, 100% of employees Entity employees are covered by agreement.

It is noteworthy that the sectoral collective agreement includes new measures to promote

Regarding parental leave, the employees who have enjoyed these leaves are the following:



Additionally, Cecabank has the Cultural Association of Employees of Cecabank or "Company Group". This Association aims to develop and organize all kinds of activities aimed at promoting leisure and education in the free time of associates and their families. through the development of cultural, sports, children's and family and tourist activities.

aspects of reconciling work and personal life, having agreed on the following measures:

- ⦿ Possibility of applying the reduction in working hours only to effective work afternoons in the unified schedule in the case of care or legal guardianship of minors under 1212 years of age or a person with a disability who does not perform a paid activity for the general schedule<sup>13</sup>.
- ⦿ Enjoy 15 days of breastfeeding to accumulate after maternity leave.
- ⦿ Creation of a paid leave of up to 3 months in the case of cases of gender-based violence that involve a change of address.
- ⦿ Calculation of all permits (with the exception of the marriage permit) on working days.

It is intended that through all the activities promoted by the Association, bonds of friendship and companionship are established between all the associated people, positively foster interpersonal relationships among all members, as well as help improve and reconcile work and family life.

### 03G. Prevention of occupational hazards

In accordance with the applicable legislation, the responsibility for the implementation, application and integration of the Occupational Risk Prevention System corresponds to the Entity's Management. At Cecabank, the organization of the necessary resources for the development of preventive activities has been designed in accordance with the External Prevention Service

modality, which covers the preventive specialties of: Industrial Hygiene and Ergonomics and Applied Psychosociology, Occupational Medicine and Safety at work.

Cecabank has a Prevention Plan that establishes a set of rules and procedures through which the management and integration mechanisms for

<sup>12</sup> Improved by Cecabank up to 14 years.

<sup>13</sup> Extended in Cecabank for the unified hours established in the Labor Agreement on working hours and schedules of August 6, 2021.

occupational risk prevention are developed, including the different preventive actions, such as the Policy, objectives and goals, organizational structure of occupational risk prevention, responsibilities and functions within the organization and monitoring and control at the integration level.

As for the operating procedures included in the Prevention Plan, there are contracting procedures, material and human resources, contracts and subcontractors, information and training procedures, consultation and participation of workers, action in case of emergency, etc.

Cecabank, SA has contracted the specialty of Occupational Medicine with the External Prevention Service of QUIRON PREVENCIÓN, SLU, whose activities are the surveillance of the health of workers in relation to the risks derived from work, analyses, medical examinations and epidemiological studies of the results of health examinations in order to investigate and analyze the possible relationships between exposure to occupational risks and damage to health.

Additionally, the Entity has a doctor, external staff subcontracted by the External Prevention Service, located in the work center, where he performs healthcare medicine tasks.

Occupational accidents and occupational diseases of workers are covered by the Mutual for occupational accidents and occupational diseases MC Mutual.

Cecabank, within the framework of the 2017-2021 Strategic Plan, drew up the Ckbe-Well Plan, which includes a series of actions to promote healthy behaviors and habits that seek to improve the well-being of our employees. Since its inception, a Physiotherapy service has been promoted to improve health through the prevention and treatment of occupational injuries, a nutrition and dietary service for employees, Back School courses, training in healthy eating, etc. have been carried out.

On the other hand, Cecabank is responsible for the training and information of its workers,

through its Training department, conducting courses on occupational risks and preventive measures for all employees, data visualization screens, as well as training for the intervention in action measures against fires and first aid.

During 2021, due to the COVID-19 pandemic, some of the scheduled face-to-face activities have been affected since the Entity has chosen and promoted, to a large extent, teleworking in order to safeguard the health of its employees' staff.

In relation to the Ckbe-Well Program, in 2021 face-to-face activities were interrupted, although online activities such as back school courses, training related to occupational risk prevention, as well as seminars focused on emotional well-being have been maintained.

With regard to the medical examinations planned for 2021, they have been carried out normally as of April 2021, and a normal development of this activity is expected during the year 2022.

During this year, a series of specific action procedures against COVID-19 have been followed in our buildings, related to protection measures (use of PPE, masks, protective screens, etc.), distancing measures, access control to buildings, among others, which have been published on the intranet within the reach of all employees.

The company's Prevention Service, together with the Medical Service and the Personnel Department, has carried out exhaustive monitoring of all cases of COVID in the company, putting into practice all the recommendations of the health authorities.

Cecabank, as a company that advocates health and safety, has agreed with a clinic to carry out a serology test on all workers who come to work in person after the mass teleworking situation during the pandemic. Specific screening campaigns have also been carried out with antigen tests for return after vacation periods or the creation of bubble groups of stable work shifts.

In 2021, 100% of the employees were represented on the Health and Safety Committee, a joint body, which meets quarterly and is governed by the single Health and Safety Committee Regulations.

Employees covered by collective agreement in Spain

100%

Hours of absenteeism at the Entity in Spain <sup>14</sup>

2020	2021
14.592	13.410

<sup>14</sup> To measure the hours of absenteeism, in accordance with the provisions of indicator 403-2 of the GRI standard, only the hours of leave due to COVID, illness and IT accidents have been considered.

As in the previous year, in 2021 there have been no professional illnesses in the workforce. In 2021 there have been no occupational accidents, excluding cases of COVID-19 that were legally considered as such. In 2020, two accidents were recorded, both without sick leave (one man and one woman).

As a result of these policies, we can highlight that the loyalty of the workforce has been achieved as a means of retaining value and knowledge.

Regarding social dialogue, the Entity has a Works Committee with 17 members in which 4 union sections are represented, which meet bimonthly; a Commission for Equality and Prevention of Sexual Harassment and a Control Commission for the Employee Pension Plan.

On the other hand, all the labor agreements signed with the labor representation have their own monitoring committee to ensure compliance with them.

## 04. Our suppliers

Cecabank maintains a high level of commitment to its suppliers, since they are essential for the development of its business and a key link in its offer of products and services. As stated in the corporate code of conduct, the Entity seeks to establish commercial relations fair and stable, based on responsibility, transparency and communication.

These commitments materialize and are managed through corporate policies and procedures. It is worth noting the rule for "Contracting services with suppliers", which establishes the steps to follow to guarantee concurrence in each procurement process and the adequate evaluation of the same and the "Policy for outsourcing and contracting services and functions" (whose last update was approved by the Board of Directors on October 20, 2020), which establishes the principles, rules and procedures that must be complied with in the different phases of the process of contracting any service to a supplier.

Cecabank has implemented a process for the approval of outsourced service providers, which is gradually being extended to the entire supply chain and is currently mandatory for all outsourced services and contracts of a relevant amount. This process is intended to assess production capacity, technical and financial aspects of the supplier, as well as its alignment with the ethical values and sustainability policies of Cecabank. In this way, the evaluation of aspects of Corporate Responsibility is incorporated, such as adherence to international standards on Human Rights, protection of the environment and proper working conditions.

The optimization of the integral management of the Entity's suppliers has been deepened by reducing the risk of the supply chain and monitoring the continuity of the services provided, strategic advice to the business departments in their outsourcing, the improvement of the operational agility of purchases, the implementation of reports and

analysis tools for monitoring approvals and has contributed to centralized negotiation with the main suppliers in collaboration with the organizational units contracting outsourced services.

Additionally, Cecabank has the "Chain of Custody Monitoring Policy", which establishes mandatory procedures for selecting third-party custodians to safeguard customer assets and minimize the risks associated with misuse or loss. , the Entity has a due diligence procedure for the permanent supervision of the third party to which the custody functions are delegated.

Aspects related to suppliers are supervised at the highest level in the Entity. The Non-Financial Risks and Compliance Division has the function of periodically informing the Compliance and Operational Risk Committee and the Audit Commission of the results of supplier monitoring. Additionally, the Cecabank Management Committee, supervises the approved outsourcing, as well as the possible incidents identified.

On the other hand, Cecabank maintains its commitment to employment through the contracting of local suppliers. In this sense, in 2021, local suppliers represented 82.5% of the total with 477 Spanish suppliers and 101 non-resident suppliers.

### Supply chain



Commitment to employment and Society

82,5% local purchase



Responsible

Approval of suppliers based on aspects of Sustainability



Close communication

Transparent and fluid with Suppliers

### Main magnitudes in 2021





## 05. Social Matters

Cecabank develops its social commitment by carrying out initiatives in accordance with corporate characteristics and objectives. The Entity and its staff are aware of social problems and specifically those that affect the most disadvantaged groups. The Entity implements specific contribution actions, which also promote pride of belonging among the people of the Entity.

Every year, Cecabank launches the “You Choose” program, in which the Entity's staff present various projects in the social, environmental or cultural field and Cecabank undertakes to finance those that are selected after an internal voting process:

The finalist projects of the “You Choose” program are shown below:

Category	Beneficiary association	Amount
Social	ALEPH-TEA	15,000,00 €
Social	Fundación Madre de la Esperanza	13,000,00 €
Social	Asociación Española contra el Cáncer (AECC)	10,000,00 €
Social	APROMAR	7,500,00 €
Social	ACTAYS	7,500,00 €
Social	Fundación el Arca de Madrid	7,500,00 €
Environment	GREFA	7,500,00 €
Environment	Fundación CBD-HÁBITAT	5,000,00 €
Social	Fundación SENARA	5,000,00 €
Social	Kyrios	5,000,00 €
Social	COMUNIDAD DEL CORDERO	5,000,00 €
Environment	Asociación Peluditos Urbanos	3,000,00 €
Social	ADISLI	3,000,00 €
Social	Fundación Esperanza y Alegría	3,000,00 €
<b>Total help</b>		<b>97,000,00 €</b>

In 2021, Cecabank received the award for the social project, “Employment post COVID: an opportunity to live” which, together with the Integra Foundation, has allowed 23 people in social exclusion, affected by COVID 19, to improve their employability through a program of personal and employment strengthening. Of the people who have participated, 45% have joined the labor market at the end of the project. The project,

In 2021, the 7th edition of the program was carried out, in which a total of 19 projects from various associations were presented (14 in the social field, 4 in the environmental field and 1 in the cultural field), which Cecabank supported with an aid of 97,000 euros.

In this edition, participation reached 77.2%, which demonstrates for yet another year not only Cecabank's commitment to its Social Action Plan, integrated into the Entity's Sustainability Policy, but also that of all its employees with the promotion of the welfare of society and its impact on the community.

financed with funds from the Tu Elect Program, has been carried out in Madrid, Barcelona and Valencia. The initiative was aimed at groups whose situation of exclusion was aggravated by the pandemic: women victims of gender-based violence, homeless people, former drug addicts, former inmates, prostituted or trafficked women, young people at risk, among others.

Additionally, we highlight the following initiatives carried out in 2021:



### Humanitarian emergencies

Cecabank has had a collaboration agreement with the Spanish Emergency Committee since 2018. This Committee is currently made up of 5 NGOs (Action Against Hunger, Intermón Oxfam, Doctors of the World, Plan International and World Vision).

The main action regarding humanitarian emergencies this year has been the Humanitarian Emergency Campaign for the earthquake in Haiti when on August 14 a magnitude 7.2 earthquake shook the poorest nation in the Western Hemisphere, causing the death of more than 2,100 people and more than 10,000 injured: Cecabank joined this initiative of the Emergency Committee to attend to the needs of those affected by the earthquake, contributing 4,385 euros in a special campaign among employees, which adds up to the same amount that Cecabank matches with the total amount of aid amounted to €8,770.



### Charity market

The Solidarity Market is an event long awaited and loved by the Cecabank staff, inviting some well-known associations and foundations from previous years and that this year have not been able to present themselves to the "You Choose" Program, as on other occasions the different associations and foundations were able to sell their own products and preparations with which they partially cover their activity. Among the associations invited this year we highlight the Bobath Foundation, the Brizal Association and Menudos Corazones.

Both the Solidarity Market and the blood donation campaign were held at the Cecabank Solidarity Day, taking advantage of the awards ceremony of the "You Choose" Program.



### Photography exhibition with Doctors of the World

There has been a photographic exhibition at the Cecabank facilities of the 24th Luis Valtueña International Photography Prize. This is an initiative promoted by Doctors of the World and whose contest is organized with the intention of highlighting human values and denouncing all kinds of violations to the rights of people, while recognizing and valuing photojournalism of the highest quality. In the exhibition, the loneliness and the structural problem of nursing homes in Spain, Venezuelan migration, the police abuse in peaceful demonstrations in Chile and terrorism and gender violence in Nigeria.



### Blood Donation Campaign with the Red Cross

On the day of the Solidarity Day, a blood donation campaign was carried out among the employees with the result, according to the Madrid Health transfusion center and the Red Cross, 69 lives were saved.

69

vidas salvadas  
gracias a vuestras donaciones de sangre



Gracias a todas las personas que formaron parte de la campaña de donación de sangre realizada el 29 de noviembre de 2021 en CECABANK

Se aumentaron 30 personas, de las cuales 23 ayudaron a donar sangre. Estas donaciones ayudarán a mejorar la vida de 69 personas, ya que cada donación de sangre salva 3 vidas.

Soy un gran ejemplo de amabilidad y colaboración





### Operation Kilo for the Food Bank

Cecabank, together with the Food Bank of Madrid, has promoted several "Operation Kilo" campaigns in 2021: emergency campaign for companies in the first half of the year and the Christmas campaign where Cecabank employees were able to make your purchase more supportive, favoring the most needy families in the Community (homeless people, elderly people, children, unemployed, among others), This year a total of 7,321 euros has been raised from employees, This amount has been dubbed by Cecabank, which has involved the donation of a total of 14,642 euros, representing 13,311 kg of food.



### Collaboration with Banco de Alimentos de Madrid

since its inception, Cecabank has maintained a strong commitment to Banco de Alimentos, collaborating with this organization by sponsoring Calle Cecabank at its Colegio San Fernando headquarters and Avenida Cecabank at its logistics center, given the relationship and the history of collaboration between both entities since 2020, Cecabank Street was replaced by Cecabank Avenue and the Avenue was converted into Cecabank Square with the consequent pride and satisfaction for Cecabank, In 2021 the Entity has continued collaborating in this regard , increasing the game up to €14,000,



### Mother Courage Clothes and Shoes Container

Since 2019, the Entity has made a container available to employees for donating clothes and shoes. In 2021, more than 243 kg have been counted. This association is in charge of giving a second life to the products, through donations to communities, sale in solidarity markets, or their delivery to external companies, generating funds for social, educational and cooperation associations.



### Computer rooms sponsored by Cecabank

The Entity is committed to financial education, digitization and social action, Since 2019 it has collaborated with the Sanders Foundation and the Community of Madrid in the construction of computer rooms for this purpose, In 2021 Cecabank has contributed with the donation of 3,000 euros for the maintenance and organization of training, aimed at the most disadvantaged groups in these classrooms.

- ⦿ The first computer room in the Royal Oratory of Caballero de Gracia aimed at groups of elderly people, immigrants and the unemployed.
- ⦿ The second computer room in the Bobath Foundation school, aimed at people with cerebral palsy in varying degrees, both children and adults.
- ⦿ The donation of computer equipment is pending for several associations that will be finalized in the first quarter of 2022.

Finally, it should be noted that no relevant risks have been detected in social issues.

## 06. Environmental issues

Cecabank is committed to the responsible and sustainable management of material resources, promoting efficiency in consumption and impacts on the social and environmental surroundings, both in its activity and in its sphere of influence.

Given Cecabank's activity, the impact on environmental aspects is limited compared to other sectors. Aspects such as pollution, noise, biodiversity, light pollution or food waste are not considered applicable.

Cecabank operates under the precautionary principle and its Sustainability Plan considers environmental aspects as an axis of action. In this way, the Entity manages, in a responsible and sustainable manner and through specific initiatives, the material resources and consumption that derive from its activity.

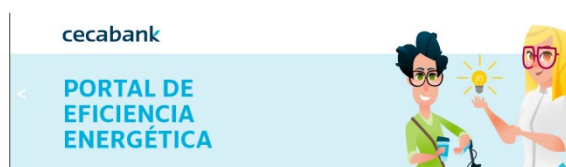
Already in 2018, Cecabank has implemented an Energy Management System in accordance with the UNE/ISO 50001:2011 standard, obtaining the AENOR certification (GE-2011/0038) dated 12/14/2018, for its corporate buildings of C/ Alcalá, 27 and C/ Caballero de Gracia, 28-30 where it carries out its activity. In 2020, the adaptation to the UNE/ISO 50001:2018 standard was carried out and in December 2021, the company obtained the renewal of the AENOR certification (GE-2011/0038) until 2024.

Within this system, important activities have been carried out in the Entity, such as:

- ⦿ Adaptation of the Bank's Energy Policy to the UNE/ISO 50001:2018 Standard.
- ⦿ Raising awareness among the entire workforce through the Good Practices guide for the use of Energy.
- ⦿ Training course for the entire workforce on Energy Efficiency in relation to Cecabank buildings



- ⦿ Creation in the Employee Portal of the Energy Efficiency Portal where best practices, energy performance and certificates are displayed.,



- ⦿ Extension of the Installation of Consumption Analyzers to increase the number of Indicators in the Energy Management System for significant uses (hereinafter SdGE).
- ⦿ Implementation of a SMARKIA computer tool for consumption monitoring and documentation of the entire SdGE.
- ⦿ Optimization of the control and management system of the facilities.

Objectives have also been defined for the period 2022 and 2023.

- ⦿ Self-consumption of electricity from renewable sources through the implementation of photovoltaic solar panels.
- ⦿ 1% reduction in electric air conditioning consumption in Alcalá.
- ⦿ Reduction of 10% in the consumption of CPDs (Data Processing Centers) and UPS (Uninterrupted Power Service) in Caballero de Gracia.



The changes in the main environmental indicators are as follows:

Building consumption		Year			
Alcalá, 27 & C. Gracia, 28-30	Measurement unit	2018	2019	2020	2021
Energy (electricity) <sup>14</sup>	GJ	8,095	7,378	5,981	6,204
Energy (natural gas) <sup>15</sup>	GJ	2,164	1,191	982	968
Paper (Ecological- Ecolabel)	Kg	27,310	23,900	9,600	6,000
Water	M3	3,766	3,994	2,062	2,132
Carbon footprint.	TonCO2	3,043	260,65	57,59*	55,81 <sup>16</sup>

As a sign of its commitment to reducing emissions, Cecabank purchases all its electricity with a Certificate of Origin (renewable), both for data processing centers and for corporate buildings, which represents a significant reduction in carbon emissions.

During the first half of 2022, the Entity works to carry out a detailed calculation of its Scope 1, 2 and 3 emissions, verifying with Aenor, its GHG Emissions Report according to the reference standard ISO 14064 -1:2019, additionally in 2021, Cecabank took a further step in its commitment to the fight against climate change by offsetting its GHG emissions for 2020 and becoming a carbon neutral Entity. For 2021 emissions, the Entity will carry out the same verification and compensation process.

The amounts earmarked for offsetting emissions were earmarked for a repopulation project in Spain, specifically in the municipality of San Martín del Pimpollar in the province of Ávila, with which the Entity also reinforced its commitment to SDGs 13 and 15.

The Entity's efforts to improve its performance in environmental matters have materialized in an annual reduction in consumption, both energy and water or paper. The reduction in Gas and Water compared to the reference year 2019 can also be seen. In year 2020, water consumption is higher due to the progressive de-escalation of the Entity's employees.

Regarding paper consumption, Cecabank has continued to make organizational efforts to reduce and rationalize the use of printing equipment, which has resulted in significant savings in printing toner and in the number of DinA4 packages consumed.

On the other hand, the Entity also tries to reduce the environmental impact through waste collection processes, differentiating between paper and cardboard, glass and hazardous waste, among others, which are collected by authorized external parties and taken to specialized plants. In 2021 Cecabank shows a progressive decrease in the waste generated in its facilities.

#### Waste generated (tons)

	2019	2020	2021
Paper and paperboard	43,75	8,94	9,41
Mixture	17,82	8,52	9,88
Batteries	0,15	0,11	0,00
Wood	0	0	5,04
Dangerous residues	1,01	3,01	1,84
Total	62,73	20,54	26,17

<sup>14</sup> The source for the conversion of energy consumption from indirect emissions as a result of the entity's electricity consumption is "Emission Factors - Ministry for Ecological Transition" [https://www.miteco.gob.es/es/change-climatico/topics/mitigation-policies-and-measures/factoresemision\\_tcm30-479095.pdf](https://www.miteco.gob.es/es/change-climatico/topics/mitigation-policies-and-measures/factoresemision_tcm30-479095.pdf)

<sup>15</sup> The source for the conversion of energy consumption of direct emissions from the entity's natural gas consumption is "Emission Factors - Ministry for Ecological Transition" [https://www.miteco.gob.es/es/change-climatico/topics/mitigation-policies-and-measures/factoresemision\\_tcm30-479095.pdf](https://www.miteco.gob.es/es/change-climatico/topics/mitigation-policies-and-measures/factoresemision_tcm30-479095.pdf)

<sup>16</sup> In the estimation of the calculation of the footprint for the year 2021, no leaks of SF6 or HFCs have been identified and, therefore, no associated emissions have been consolidated. Emissions associated with the use of generator sets are excluded from the calculation of the year, since their contribution to the Entity's Carbon Footprint is less than the materiality set (5%).

## 07. Human rights matters

Cecabank is firmly committed to operating responsibly, complying with applicable legal regulations and respecting and supporting Human Rights. Given the nature of its activity and its presence in Spain and Europe, the Entity has not identified relevant risks in these matters. The compliance, risk and internal audit functions guarantee that Cecabank complies with applicable laws.

Cecabank joined the Global Compact in February 2017 and in 2021 it has continued working to spread its ten principles, based on human rights, labour, the environment and the fight against

corruption. In 2020, the Entity adhered to the "Declaration of business leaders for renewed international cooperation" promoted by the Global Compact, which aims to unite companies in favor of international cooperation (based on Human Rights) and Sustainable development.

This year 2021, a training pill was sent to all employees on the 10 Principles of the Global Compact and the Sustainable Development Goals, bringing Sustainability closer to the entire company. Additionally, Cecabank has supported various campaigns on Human Rights in Social Networks.

### Human rights

<p><b>Principle 2</b></p> <p>Businesses must support and respect the protection of internationally recognized fundamental human rights within their sphere of influence</p> <p><b>Principle 2</b></p> <p>Companies must ensure that their companies are not complicit in the violation of Human Rights</p>	<p>The Code of Corporate Conduct ensures compliance with and defense of Human Rights and makes the Corporate Conduct Channel available to employees to report any type of violation thereof. As in 2020, in 2021 there have been no received complaints about Human Rights or any other type.</p> <p>The Risk and Compliance and Internal Audit areas ensure strict compliance with the applicable regulations, the Criminal Compliance Policy and the reputational reports made to the stakeholders also ensure compliance with the law, due diligence and non-infringement of human rights.</p> <p>For more information see Section 07, Anti-Corruption and Bribery Issues.</p>
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### Labor Standards

<p><b>Principle 3</b></p> <p>Companies must support freedom of association and the effective recognition of the right to collective bargaining</p>	<p>The people who provide services at Cecabank are its main asset. For this reason, various policies and initiatives are developed that favor physical integrity and respect among people, health and safety at work, professional development, equal opportunities, non-discriminatory treatment, among others. Cecabank's work organization is based on the collective agreement of the Savings Banks and Financial Entities, improving conditions by contract and applying compensatory measures to employees with special conditions.</p> <p>Cecabank has the EFR Certificate (Family Responsible Company) granted by the Másfamilia Foundation, obtaining the concession in 2021.</p> <p>Cecabank has a Plan for Equality between women and men and reconciliation of work and family life. It also includes a Protocol of actions in the event of complaints of workplace harassment, sexual harassment and harassment based on sex in Cecabank.</p> <p>For more information see Section 03, People Management.</p>
<p><b>Principle 4</b></p> <p>Businesses should support the elimination of all forms of forced and coerced labor</p>	
<p><b>Principle 5</b></p> <p>Companies should support the eradication of child labor</p>	
<p><b>Principle 6</b></p> <p>Companies must support the abolition of discriminatory practices in employment and occupation</p>	

### Environment

<p><b>Principle 7</b></p> <p>Companies must maintain a preventive approach that favors the environment</p>	<p>Cecabank promotes the responsible and sustainable management of material resources and efficiency. The Entity has implemented an Energy Management System according to the ISO 50001 standard, ensuring continuous improvement in energy management, through the installation of technologies to reduce consumption and renewable energy.</p> <p>The Entity has progressively reduced its carbon emissions and offset its 2020 Carbon Footprint in 2021, becoming Carbon Neutral.</p> <p>For more information see Section 06, Environmental Issues.</p>
<p><b>Principle 8</b></p> <p>Companies should encourage initiatives that promote greater environmental responsibility</p>	
<p><b>Principle 9</b></p> <p>Companies must favor the development and diffusion of environmentally friendly technologies</p>	

### Anti-corruption

<p><b>Principle 10</b></p> <p>Businesses must work against corruption in all its forms, including extortion and bribery.</p>	<p>In addition to the Code of Conduct that incorporates aspects related to the prevention of corruption and bribery, Cecabank is certified by AENOR in 2021 in accordance with the UNE 19601 Standard on Criminal Compliance. Additionally, the company has Prevention and Money Laundering procedures.</p> <p>For more information see Section 07, Matters related to the fight against corruption and bribery.</p>
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## 08. Anti-corruption and anti-bribery information

The Entity has a Code of Corporate Conduct that formalizes the commitment of all professionals to the highest standards of integrity and professional ethics in order to prevent, among others, criminal risk. The values and standards contained therein are mandatory and globally applicable to all members of the Board of Directors, all employees and other affiliated entities of its consolidated group, either directly or through its suppliers, and must permeate relationships with interest groups.

This code incorporates, among other aspects, guidelines for conduct on aspects related to corruption, prevention and money laundering and financing of terrorism, Confidential information, free competition, conflicts of interest, among others.

In relation to this Code, Cecabank has a Corporate Conduct Channel through which all persons subject to it can file complaints of possible breaches, as well as make the pertinent queries derived from its interpretation. The treatment of complaints is confidential.

Additionally, Cecabank has other instruments that promote exemplary conduct as an Entity:

- ⦿ Criminal risk organization and management system. The system has been certified again by AENOR in 2021 in accordance with the UNE 19601 Standard on Criminal Compliance.
- ⦿ Backbone document of the criminal risk organization and management system.
- ⦿ Procedures for the prevention of money laundering and financing of terrorism and control structure.
- ⦿ Internal rules of conduct in the field of the securities market.
- ⦿ Policies for the provision of investment services or MiFID policies. These policies are grouped into three blocks: relating to transparency and reporting (Transparency Policy and Governance Framework of the TR), relating to structural market issues (Record-keeping Policy, Product Governance and Algorithmic Trading Policy) and investor protection (best execution policy, asset safeguard and incentive policy). The main

objective of these policies is the proper compliance, by the Bank, with the rules of conduct and organizational requirements linked to the provision of investment services.

Cecabank annually reviews its Criminal Compliance system, establishing actions to ensure continuous improvement of the System.

Indicator description	Indicator units	2020	2021
Actions (corrective, improvements, preventive) in progress arising from the Compliance system	Number of shares	15	5
Internal Audit recommendations regarding the system	Number of recommendations	-	2

Cecabank has a Manual for the prevention of money laundering and financing of terrorism that seeks to ensure that the Entity and its employees prevent illicitly obtained funds from accessing the financial system through Cecabank. The Entity's computer systems allow the analysis of its own and intermediary operations, in order to detect possible operations related to these aspects. For these purposes, checks are carried out against lists of financial sanctions, and there are specific scenarios for detecting suspicious operations. Additionally, there are tools and processes that allow an exhaustive knowledge of the client, and follow-up of the relationship with it.

The organizational structure and internal control mechanisms are aimed at ensuring that the Bank's activities are efficient and effective, that the information is reliable, timely and complete, and that it complies with applicable laws. There are specific management and control units for the different risks with comprehensive and uniform areas of action, with relations between the risk management units guided by the principles of coordination, cooperation and reciprocal information and by the existence of three levels of control.

During 2021, the Entity has worked on redefining the indicator of operations evaluated for risks related to

corruption, as well as the associated controls. In this sense, the number of evaluations carried out was reduced in 2021, although the analysis focused on those operations with greater materiality for these purposes.

Indicator description	Indicator units	2020	2021
Operations assessed for risks related to corruption	Number of transactions	11,934	5,806
Confirmed incidents of corruption and actions taken	Number of cases	-	-

## 09. Tax and accounting information

Cecabank's fiscal policy seeks to comply with regulations and eliminate any risk that could arise from non-compliance with regulations. In this sense, the company has a Tax Committee in charge of analyzing and interpreting the regulations that apply to Cecabank's activity and the control of compliance with the formal obligations in the investigation, evaluation and monitoring of the possible risks related to the matter. This Committee reports in turn to the Audit Committee, the Management Committee and the Risk Committee.

Consolidated Profit Before Tax (BAI) amounted to 93,600 thousand euros in 2021, compared to 74,394 thousand euros in 2020, with the following breakdown:

	Thousands of euros		
	2021	2020	2019
Spain	93.647	75.349	65.166
Belgium	(136)	23	(206)
United Kingdom	- <sup>17</sup>	(604)	(1.665)
Portugal	89	(374)	(444)

Regarding the amounts of taxes paid in 2021, they amount to EUR 10,466 thousand (EUR 10,247 thousand in 2020) according to the following description:

Corporation Tax 2020 Settlement- Cecabank	1,920
Payments on account and 2021 withholdings of IS Spain- Cecabank	(12,363)
Belgium (Trionis)	(23)

For further information on corporate income tax, see note 2.12 of the Annual Accounts of Cecabank, S.A. and its subsidiaries which form part of the Cecabank Group.

As in 2020, Cecabank has not received any public subsidies in the year ended 31 December 2021.

<sup>17</sup> In 2021 the United Kingdom ceases to be a Branch.



## Appendix

### Appendix 1: Comparison of the number of employees by professional category in 2020 and 2021

#### Number of employees by age

<30		30-50		>50	
2021	2020	2021	2020	2021	2020
20	2	291	300	147	168

#### Number of employees by professional category

	Level I		Level II		Level III		Level IV		Level V		Level VI		Level VII		Level VIII		Level IX		Level X		Level XI		Level XII		Level XIII			
	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021		
<b>Group 1</b>																												
Male	3	5	5	3	18	17	30	30	32	31	63	52	31	28	26	25	9	10	8	7	1	3	1	10	-	-		
Female	-	3	3	2	9	12	17	12	26	30	56	46	44	41	54	51	16	15	7	7	4	4	4	10	-	-		
<b>Group 2</b>																												
Male	1	1	2	2	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Female	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

#### Dismissals by sex, age and professional category

##### Leave by gender

Period	Gender	ERE	Voluntary termination	Dismissal	Voluntary leave	Terminations	Total
2021	Female	16	1	1	1	1	20
	Male	19	4	1	-	2	26
2020	Female	1	2	1	-	-	4
	Male	-	-	3	-	-	3

##### Dismissals for sex

Gender	2021	2020
Female	1	1
Male	1	3
<b>Total</b>	<b>2</b>	<b>4</b>

##### Layoffs by age group

Age Range	2021	2020
> 50	0	1
30 - 50	2	3
<b>Total</b>	<b>2</b>	<b>4</b>

##### Layoffs by professional category

Age Range	2021	2020
IV	1	0
V	0	1
VI	0	2
VIII	1	1
<b>Total</b>	<b>2</b>	<b>4</b>

## Appendix 2: Comparison of training hours in 2020 and 2021

	Level I		Level II		Level III		Level IV		Level V		Level VI		Level VII		Level VIII		Level IX		Level X		Level XI		Level XII		Level XIII	
	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021
Group 1	106	364	403	177	941	1546	1839	2326	2329	2901	3322	4468	2754	2765	2082	2901	1436	1120	335	387	193	231	103	272	-	-
Group 2	5	17	21	34	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

## Appendix 3: Table of compliance with Law 11/2018 (28 December)

The following table provide details regarding which section of this Non-Financial Information Statement responds to the requirements of Law 11/2018 and identifies the reporting standard that has been used in this respect.

Content of law 11/2018 nfis	Chapter of the non-financial information statement presenting the information	Associated gri indicator
<b>Business model</b>		
Strategic lines and business model	01A. Our business model	GRI 102-1
Organisation and structure	01B. Cecabank's Profile	GRI 102-2
Markets in which it operates	01B. Cecabank's Profile	GRI 102-3
Objectives and strategies	01B. Cecabank's Profile 01C. Market environment and business strategy	GRI 102-4 GRI 102-6
Main factors and trends that may affect future development	01C. Market environment and business strategy	
<b>Policies</b>	Details are provided in each of the sections in this report, depending on the topic.	GRI 103 - Management approach in each material matter
<b>Main risks</b>	Details are provided in each of the sections in this report, depending on the topic.	GRI 102-15
<b>Environmental issues</b>		
<b>Global</b>		
Effects of the organization's activities on the environment and health and safety, environmental evaluation or certification procedures;	06. Environmental issues	GRI 102-15 GRI 102-29 GRI 102-30 GRI 102-31
Precautionary principle, the amount of provisions and guarantees for environmental risks.	06. Environmental issues	GRI 102-11 GRI 103-2
Resources dedicated to preventing environmental risks	06. Environmental issues	GRI 102-29
<b>Pollution</b>		
Measures to prevent, reduce or repair carbon emissions that seriously affect the environment; taking into account any specific atmospheric pollution from a business, including noise and light contamination.	06. Environmental issues	GRI 103-2 GRI 301-1 GRI 302-1 GRI 302-4 GRI 302-5 GRI 305-5
<b>Circular economy and waste prevention and management</b>		
Circular economy, prevention measures, recycling, reuse, other forms of recovery and elimination of waste.	06. Environmental issues	GRI 103-2 GRI 301-1 GRI 302-1 GRI 306-2
Actions to fight food waste.	06. Environmental issues	Not material/GRI 103 - Food waste
<b>Sustainable use of resources</b>		
Water consumption and supply in accordance with local limitations	06. Environmental issues	GRI 303-1
Consumption of raw materials and the measures adopted to improve their efficient use	06. Environmental issues	GRI 103-2 GRI 301-1
Energy: Direct and indirect energy consumption, measures taken to improve energy efficiency and the use of renewable energies	06. Environmental issues	GRI 103-2 GRI 302-1 GRI 302-4
<b>Climate change</b>		
Greenhouse gas emissions.	06. Environmental issues	GRI 305-1 GRI 305-2
Measures taken to adapt to the consequences of climate change	06. Environmental issues	GRI 305-5
Medium- and long-term voluntary targets to reduce greenhouse gas emissions and measures implemented to that end.	06. Environmental issues	GRI 103-2
<b>Protection of biodiversity</b>		
Measures taken to preserve or restore biodiversity	06. Environmental issues	Not material/GRI 103 - Biodiversity
Impacts caused by activities or operations in protected areas	06. Environmental issues	
<b>Social and employee information</b>		
<b>Employment</b>		
Total number and distribution of employees by	03A. Our employees	GRI 102-8

Content of law 11/2018 nfis	Chapter of the non-financial information statement presenting the information	Associated gri indicator
gender, age, country and professional Level.		
Total number and distribution of types of employment contracts	03A. Our employees	GRI 102-8
Annual average of indefinite contracts, temporary contracts and part-time contracts, by gender, age and professional Level.	03A. Our employees	GRI 102-8
Number of dismissals by gender, age and professional Level	03A. Our employees	GRI 401-1
Average compensation and remuneration development broken down by gender, age and professional Level, or an equivalent value	03D. Remuneration 03E. Employee benefits	GRI 405-2
Salary Gap, remuneration for identical job positions or average positions at the company.	03D. Remuneration	GRI 405-2
The average compensation for directors and executives, including	03D. Remuneration	GRI 102-35
variable compensation per diems, severance payments, payments into long-term retirement savings systems and any other amount broken down by gender		GRI 102-36
Implementation of work disconnect policies	03F. Reconciliation	GRI 103-2 (employment)
Employees with disabilities	03B. Equality	GRI 405-1
<b>Organisation of working time</b>		
Organization of working time	03F. Reconciliation	GRI 103-2
Absenteeism in hours	03G. Prevention of Occupational Hazards	GRI 403-2
Measures intended to facilitate the reconciliation and encouragement of co-parenting responsibilities	03E. Employee benefits 03F. Reconciliation	GRI 103-2 GRI 401-3
<b>Health and safety</b>		
Occupational health and safety conditions	03G. Prevention of Occupational Hazards	GRI 103-2 (health and safety)
Occupational accidents (frequency and seriousness) disaggregated by sex.	03G. Prevention of Occupational Hazards	GRI 403-2
Occupational illnesses (frequency and seriousness) disaggregated by sex.	03G. Prevention of Occupational Hazards	GRI 403-2
<b>Labour relations</b>		
Organization of social dialog, including procedures to inform and consult employees and to negotiate with them	03G. Prevention of Occupational Hazards	GRI 103-2 (employee-employer relations) GRI 102-43 GRI 403-1 GRI 102-41
Percentage of employees covered by collective bargaining by country	03G. Prevention of Occupational Hazards	GRI 102-41
Balance of collective bargaining agreements, particularly in the area of Occupational Health and Safety	03G. Prevention of Occupational Hazards	GRI 403-1
<b>Training</b>		
Training policies implemented	03C. Training	GRI 103-2 (training and education)
Total number of training hours by professional Level	03C. Training	GRI 404-1
Universal accessibility of disabled persons	03c. Training	Gri 103-2 (diversity and equal opportunities / non- discrimination)
<b>Equality</b>		
Measures adopted to promote equal treatment and opportunities for men and women	03B. Equality	GRI 103-2 (Diversity and equal opportunities)
Equality plans, measures adopted to promote employment, protocols to	03B. Equality	GRI 103-2 (Diversity and equal opportunities / non- discrimination)
fight against sexual harassment and gender discrimination, the integration		
and universal accessibility of disabled persons		
Non-discrimination policy and any diversity management	03A. Our employees 03B. Equality	GRI 103-2 (Diversity and equal opportunities / non- discrimination)
<b>Human rights</b>		
Application of due diligence procedures in human rights matters.	07. Human rights matters	GRI 103-2 (human rights assessment)
Prevention of human rights violation risks and measures to mitigate, manage and repair any abuses.	07. Human rights matters	GRI 103-2 (human rights assessment)
Reports of human rights violations	07. Human rights matters	GRI 102-16 GRI 102-17 GRI 406-1
Promotion and compliance with the provisions of the fundamental Conventions of the International Labour Organization related to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour.	07. Human rights matters	GRI 103-2 (non-discrimination; freedom of association and collective bargaining; child labour; forced or compulsory labour and human rights)
<b>Corruption and bribery</b>		
Measures adopted to prevent corruption and bribery	08. Anti-corruption and anti-bribery information	GRI 103-2 (anti-corruption) GRI 205-1 GRI 205-3
Measures to fight against money laundering	08. Anti-corruption and anti-bribery information	GRI 103-2 (anti-corruption)

Content of law 11/2018 nfis	Chapter of the non-financial information statement presenting the information	Associated gri indicator
Contributions to foundations and non-profit organizations.	05. Social matters	GRI 103-2 (anti-corruption) GRI 413-1
<b>Company</b>		
<b>The company's commitment to sustainable development</b>		
Impact of the organization's activities on employment and local development, local populations and territories	05. Social matters	GRI 413-1
Relationships and types of dialog with members of local communities	05. Social matters	GRI 102-43 GRI 413-1
Association or sponsorship actions	05. Social matters	GRI 102-13
<b>Subcontracting and suppliers</b>		
The inclusion in the purchasing policy of social, gender equality and environmental issues	04. Our suppliers	GRI 103-3 (supplier environmental and social assessment)
Consideration of social and environmental responsibility in relationships with suppliers and subcontractors	04. Our suppliers	GRI 102-9
Supervision and audit systems and their results	04. Our suppliers	GRI 308-1 GRI 414-2
<b>Consumers</b>		
Measures for consumer health and safety	02. Our customers	GRI 103-2 (customer health and safety)
Claims systems, complaints received and their resolution	02. Our customers	GRI 103-2 (customer health and safety)
<b>Tax information</b>		
Profit/loss by country	09. Tax and accounting information	103.- Financial performance GRI 201-1
Corporate income tax paid	09. Tax and accounting information	GRI 201-1
Official subsidies received	09. Tax and accounting information	GRI 201-4

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