

**CONSOLIDATED
STATEMENT OF
NON-FINANCIAL
INFORMATION
AND
SUSTAINABILITY
INFORMATION
2024 OF GRUPO
LABORAL KUTXA**

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GENERAL INFORMATION

NEIS 2 GENERAL INFORMATION

[BP-1] General basis for the preparation of sustainability statements

The Sustainability Office (OdS) of LABORAL Kutxa has coordinated the preparation of this Consolidated Statement of Non-Financial Information and Sustainability Information (hereinafter Sustainability Statement) of the LABORAL Kutxa Group (hereinafter GLK). It was also responsible for conducting the materiality study to determine the materiality issues.

The sustainability statement has been prepared with the same scope of consolidation as the financial statements, and in accordance with Article 19 bis, section 9, or 29 bis, section 8, of Directive 2013/34/EU (otherwise expressly stated in the relevant disclosure breakdown). All subsidiaries included in the consolidation are exempt from individual or consolidated sustainability reporting. All commercial activity takes place in Spain, with two distinct markets. On the one hand, the Basque Country and Navarre, the communities where the cooperative originated, and also the autonomous communities of northern Spain, with an increased presence in recent years in Madrid and Barcelona. The Group's parent company is Caja Laboral Coop. de crédito with headquarters at Paseo José María Arizmendiarieta s/n Arrasate-Mondragón, 20500, Gipuzkoa and the subsidiaries that form part of the Group are:

| Dependent Entities | Activity | Shater percentage | Headquarters |
|---|----------------------------|-------------------|---|
| Seguros Lagun Aro Vida, S.A. | Insurance | 100 % | Calle Capuchinos de Basurto nº 6, 2º, 48013 Bilbao (Bizkaia) |
| Seguros Lagun Aro, S.A. | Insurance | 100 % | |
| Seg. Lagun Aro 2003, IEA | Insurance | 100 % | |
| Caja Laboral Gestión SGIIC, S.A. | Investment fund manager | 100 % | Paseo José María Arizmendiarieta 5, 1ª Arrasate-Mondragon 20500 Gipuzkoa |
| Caja Laboral Pensiones GFP, S.A. | Pension fund manager | 100 % | Paseo José María Arizmendiarieta SN Edificio 5 1ª Arrasate-Mondragon 20500 Gipuzkoa |
| ISGA Inmuebles, S.A.* | Property Asset Manager | 100 % | Paseo José María Arizmendiarieta 4 Arrasate-Mondragón 20500 Gipuzkoa |
| Caja Laboral Euskadiko Kutxa Cartera, S.L.U. | Holding company | 100 % | |
| Caja Laboral Bancaseguros (CLBS) O.B.S.V., S.L.U. | Banking Insurance Operator | 100 % | Calle Gran Via Diego Lopez de Haro, 2 - PISO 1, Bilbao, 48001 , Bizkaia |
| Lagun Klik, SLU | Brokerage of services | 100 % | Calle Capuchinos de Basurto nº 6, 3º, 48013 Bilbao (Bizkaia) |
| Partners Group LAMIAK S.C.A, SICAV - RAIF | Asset management | 99 % | Avenue John F. Kennedy 35 D, L-1855 Luxembourg |

| Associated entities | Activity | Shater percentage | Headquarters |
|-------------------------|---|-------------------|---|
| ATEGI GREEN POWER, S.L. | Production of energy from renewable sources | 28.57 % | Calle Goiru (ed b), 1 – Piso 3, Arrasate/Mondragón, 20500, Gipuzkoa |

Of these entities, the Parent Company has its own personnel, as do the insurance companies (Seguros Lagun Aro Vida, S.A.; Seguros Lagun Aro, S.A. and Seg. Lagun Aro 2003, A.I.E) and Caja Laboral Bancaseguros.

The statement has taken into account the upstream and downstream stages of the entity's value chain.

The option to omit information relating to intellectual property, know-how or results of innovation has not been used, except in relation to Cybersecurity and data processing as this is sensitive information. Disclosure of imminent developments or matters under negotiation has also not been omitted. The entity shall report on sustainability issues on the basis of the principle of relative materiality.

The statement reference period is from 1/1/2024 to 31/12/24. This statement forms part of the Group's management report.

[BP-2] Disclosures in relation to specific circumstances

No temporary deviations are detected in the short term (time horizon: 1 year), medium-term (time horizon of 1 to 5 years) or long-term (time horizon of more than 5 years) with respect to those defined in section 6.4 of Neis1. In the event that this circumstance is identified in the sustainability statement, it would be specified together with the information to which it refers, pointing out the deviation and explaining the reasons for it.

At a general level, no specific circumstances are identified that influence the GLK in the preparation of the sustainability statement.

Except where otherwise stated, references in this consolidated NFI to other documents, or reports, are for information purposes only. No information is incorporated by reference.

Upstream and downstream value chain data estimated for materiality beyond what is reported in section E1 – 6 "Gross GHG emissions from Scope 1, 2, 3 and Total" are not included. Similarly, neither quantitative parameters nor monetary amounts subject to a high degree of uncertainty are detected, otherwise this fact is reported.

In FY2024 there is no methodology available to relate monetary amounts of CapEx and OpEx needed to implement the actions being developed in this statement with respect to the material issues. Work on this methodology is planned throughout 2025 with a view to having it in place by 2025-2026.

As this is the first year in which the sustainability statement is disclosed under the CSRD, there are no changes in the preparation and presentation of the information compared to the previous period except where expressly stated in the sustainability statement. This statement contains additional information to that required by the NEIS to comply with Law 11/2018 on non-financial information and diversity, when this information is introduced it is expressly stated. For items responding to Law 11/2018, information will be provided for the previous period, including ESRS covering both regulations. There are no material errors from previous years.

This consolidated statement of non-financial information and sustainability information provides information in compliance with Law 11/2008. Pending the transposition of the Directive into Spanish law, the information required in this Law and not contemplated in the CSRD is presented. The information presented in the report is structured on the basis of the European ESRS standards, included in the aforementioned CSRD Directive. Qualitative information and tables are also published to comply with the Taxonomy Regulation (EU) 2020/852. With regard to other legislation, standards and frameworks on sustainability information, the template for communicating the situation with regard to the Principles of Responsible Banking to which LABORAL Kutxa is a signatory is published as an appendix.

[GOV-1] Role of administrative, managerial and supervisory bodies

Composition of the administrative, management and supervisory bodies:

The Governing Board is composed of persons who, taken as a whole, have sufficient knowledge, skills and experience in the governance of credit institutions to have a proper understanding of the institution's activities, including its main risks, and to ensure the Board's effective ability to make independent and autonomous decisions in the best interests of the institution.

The Governing Board has the necessary profiles for the proper performance of the duties assigned to the Appointments Committee, the Remuneration Committee, the Risk Committee and the Audit Committee.

An annual review is carried out to ensure that the directors continue to be suitable for the exercise of their duties, and the needs for new profiles that the Board may require are jointly reviewed. In addition to completing specific training actions.

The analysis of this document highlights the following aspects:

- ✓ All members of the Board are educated to degree level and most of them hold Masters or PhD degrees in subjects such as business management, finance, taxation or auditing.
- ✓ Eleven of the fourteen members have two years or more experience as members of the Board of Directors of a credit institution.
- ✓ Eight of its 14 members have been involved in the management of a large company and more than half of its members have professional experience in banking and/or financial services.
- ✓ 65% of the board members have knowledge and experience in accounting, auditing, or both.

- ✓ One of the members of the Governing Board is an expert in ICT and another member is an expert in sustainability.
- ✓ Seven directors are accredited in Corporate Governance (accreditation by the IC-A). Those who are not accredited have experience or training in this area.
- ✓ Three members have accredited training in MIFID and LCCI.
- ✓ Three board members have knowledge of the insurance business.
- ✓ Half of the members of the board of directors have previous experience on boards of directors or boards of trustees.

| Name | Gender | Independent | Working member | Non-executive | Other external member | Governing Board | Appointments Committee | Remuneration Committee | Audit and CN Committee | Risks Committee | Main Operations Committee |
|----------------------------------|--------|-------------|----------------|---------------|-----------------------|-------------------|------------------------|------------------------|------------------------|--------------------|---------------------------|
| PLAZA IZAGUIRRE, ADOLFO | M | | ✓ | | | PCR ¹ | | | | | ✓ |
| GIL SAGARDUY, EDORTA | M | | ✓ | | | VCR ² | | VCRE ⁷ | | VCRS ¹¹ | |
| MAULEON SAINZ DE VICUÑA, BEATRIZ | F | | | ✓ | | VCR ² | | VCRE ⁷ | | | ✓ |
| SORIA ALONSO, AITOR | M | | | ✓ | | VCR ² | | | | | ✓ |
| SAGARNA ARRIZABALAGA, XABIER | M | ✓ | | | | VCR ² | VCN ⁵ | | VCA ⁹ | | |
| LÓPEZ-CANO, IÑIGO | M | | ✓ | | | VCR ² | VCN ⁵ | | VCA ⁹ | | |
| ELGARRESTA IBARRONDO, ITZIAR | F | ✓ | | | | VCR ² | PCN ⁶ | | | | |
| KORTA ERRAZKIN, ESTHER | F | ✓ | | | | VCR ² | | PCRE ⁸ | | | ✓ |
| ÁLVAREZ RUBIO, JUAN JOSÉ | M | ✓ | | | | VCR ² | | | PCA ¹⁰ | | |
| LARRABEITI LIBANO, NAGORE | F | ✓ | | | | VCR ² | | | VCA ⁹ | VCRS ¹¹ | |
| MARTEN ULARTE, IVÁN | M | ✓ | | | | VCR ² | | | | PCRS ¹² | |
| SANTXA VAZQUEZ, ÁLVARO | M | | ✓ | | | SCR ³ | | | VCA ⁹ | | |
| CORTABARRIA ACHA, MARÍA BELÉN | F | ✓ | | | | VPCR ⁴ | | VCRE ⁷ | | VCRS ¹¹ | |
| SAN JOSÉ RUÍZ DE AGUIRRE, LEIRE | F | ✓ | | | | VCR ² | VCN ⁵ | | | VCRS ¹¹ | |

¹ Chairman of the Governing Board; ² Member of the Governing Board; ³ Secretary of the Governing Board; ⁴ Vice-Chairman of the Governing Board

⁵ Member of the Appointments Committee; ⁶ Chairman Appointments Committee; ⁷ Member of the Remuneration Committee;

⁸ Chairman of the Remuneration Committee; ⁹ Member of the Audit Committee; ¹⁰ Chairman of the Audit Committee

¹¹ Member of the Risks Committee; ¹² Chairman of the Risks Committee

Total 14: 57% men and 43% women

Percentage of independent members: 57 %

| BOARD OF DIRECTORS | GENDER | EXECUTIVE |
|--------------------------------------|--------|-----------|
| EGIBAR GAINZA, XABIER | M | ✓ |
| MEZKORTA ARMAOLEA, URTZI | M | ✓ |
| MARURI HERNAEZ, JOSEBA MIKEL | M | ✓ |
| ANDRES GORGOJO, SUSANA | F | ✓ |
| URGOITI URIOSTE, IBON | M | ✓ |
| CORTAJARENA GOÑI, FCO.JAVIER | M | ✓ |
| EGUSKIZA SIERRASESUMAGA, OSCAR MARIA | M | ✓ |
| AGUIRRE UNZUETA, NURIA | F | ✓ |
| GALLASTEGUI MARTINEZ, AINHOA | F | ✓ |
| MONGELOS GARCIA, PABLO | M | ✓ |

Total 10: 70% men, 30% women

With regard to business conduct (G1), the Governing Board has approved a Code of Ethics and Professional Conduct that regulates the principles of action and rules of conduct that should guide the behaviour of employees (including senior management) and directors with the aim of developing professional, transparent, honest and upright conduct. With regard to the experience of the administrative, management and supervisory bodies in matters of business conduct, half of the members of the Governing Board hold the Corporate Governance certificate issued by the Institute of Directors and Administrators. The rest of the directors are trained in corporate governance.

There is a continuous training programme where aspects of good governance are reviewed annually, especially those related to AML/CFT and cybersecurity.

The Code of Ethics includes compliance with the law as a principle of action, including a specific section on the Prevention of Money Laundering and Financing of Terrorism, insofar as the Entity is subject to this regulation, with an AML/CFT Manual and an Internal Control Body with specific prevention functions.

The Governing Board has appointed an Ethics Committee to oversee the application of the Code of Ethics and has approved a Criminal Prevention Model that seeks to structure a system of prevention and response to possible criminal conduct applicable to the Entity. The Governing Board has also approved an Internal Information System (whistle-blowing channel) where behaviour contrary to the Code of Ethics can be reported.

The Code of Ethics is published on the institution's intranet and includes a section on the governance model of the code which sets out the functions of the Governing Board and the Ethics Committee with respect to the conduct regulated therein.

The Regulatory Compliance Department submits a quarterly report to the Audit and Regulatory Compliance Committee and a half-yearly report to the Governing Board on the most relevant aspects of the Ethics Committee's performance in relation to the Code of Ethics and Professional Conduct, which is also submitted to the Board of Directors.

The Sustainability Office is responsible, by delegation of the Board of Directors, for monitoring sustainability impacts, risks and opportunities. The Office reports regularly to the Governing Board and the Sustainability Committee (Board of Directors) on sustainability issues, including impacts, risks and opportunities, for monitoring. This monitoring is carried out at least three times a year. Both the Sustainability Committee and the Governing Board have validated the process of identifying material issues. In addition, the Risk Committee of the Governing Board monitors the established ESG risk indicators, thresholds and limits on a quarterly basis.

[GOV-2] Information provided to, and sustainability issues addressed by, the administrative, management and supervisory bodies

The Sustainability Office (SO) provides sustainability information to both the Governing Board and the Board of Directors at least three times a year. The sustainability policy states that the Governing Board "to ensure compliance with the strategy, policies, regulatory requirements, supervisory expectations and the annual plan will be reported to at least three times a year".

Prior to the appearance at the Governing Board, the Sustainability Committee meets to discuss the matters to be brought before the Governing Board. In addition, the Risk Appetite Framework indicators, including those relating to ESG risks, are presented and monitored quarterly at the Risk Committee of the Governing Board. In addition to these meetings, the Committee meets periodically depending on the issues to be addressed. In 2024 the Governing Board discussed:

- The 2023 NFI-Sustainability Report
- 2023 dual materiality analysis.
- Data concerning taxonomy-GAR from 2023.
- TCFD-TNFD report on climate and natural hazards
- The closure of the sustainability management plan and the approval of the 2024 plan.
- Update of the Sustainability Policy following the internal audit process and approval of the Due Diligence Policy in relation to the Principal Adverse Incidents (PAIs) on sustainability factors in discretionary portfolio management (DPM).

In addition, the Committee also discussed issues such as:

- First draft of the dual materiality analysis according to CSRD
- Results of the internal audit on ESG governance

- Results of the sectoral project on emerging risks.
- Bank of Spain inspection on the integration of ESG risks into credit risk.
- Follow-up of the sustainability management plan

In addition, the risk, audit/compliance and appointments committees meet monthly, except in the summer, prior to the Governing Board meeting.

The section [SBM-1] Strategy, business model and value chain explains how the administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing the strategy, decisions on major operations and the risk management process.

[GOV-3] Integrating sustainability into incentive schemes

The Governing Board, in its supervisory role, has no incentives.

For the Board of Directors, the incentive system has a collective version, which applies to all working partners, and an individual version. Within the individual incentive scheme, ESG variables have a weighting of 10%. The conditions of the incentive systems of the Board of Directors, as an identified group, are approved by the Remuneration Committee, which issues a report that is submitted to the Governing Board for approval.

There are two metrics for individual incentives:

- one related to a synthetic environmental performance indicator (carbon footprint and paper consumption).
- Design of a decarbonisation plan.

The variable related to carbon footprint reduction is measured according to the reference frameworks. Specifically, it is the reduction of 5% of the operational carbon footprint (generated in the activity itself). The methodology explained in E1-6 Gross GHG emissions is used for the calculation.

Individual variable remuneration is approved by the Governing Board, as are all conditions of incentive schemes.

[GOV-4] Due diligence statement

The process by which the LABORAL Kutxa Group determines, prevents, mitigates and is accountable for how it deals with real and potential negative incidents or impacts on the environment and people, including the non-violation of Human Rights, related to its activities is explained in the following sections:

| CORE ELEMENTS OF DUE DILIGENCE | SECTIONS OF THE SUSTAINABILITY STATEMENT |
|---|--|
| Integrate due diligence into governance, strategy and business model. | NEIS2-GOV2: Information provided to the company's administrative, management and supervisory bodies and sustainability issues addressed by them. NEIS2-GOV3: Integrating sustainability into incentive schemes. NEIS2-SBM3: Material issues, risks and opportunities and their interaction with the strategy and business model. |
| Stakeholder involvement at all stages of due diligence. | NEIS2-SBM2: Stakeholders' interests and views. NEIS 2 IRO1: Description of the process for identifying and assessing material impacts, risks and opportunities |
| Identify and assess adverse impacts | NEIS2-IRO1: Description of the process for identifying and assessing material impacts, risks and opportunities NEIS2-SBM3: Material issues, risks and opportunities and their interaction with the strategy and business model. |
| Taking measures to address these adverse impacts | NEIS2- MDRA: Actions and resources in relation to material sustainability issues. |
| Monitoring the effectiveness of these efforts and communication | NEIS2-MDRM: Parameters in relation to material sustainability issues. NEIS2 -MDRT; Monitoring the effectiveness of policies and actions through targets. |

[GOV-5] Risk management and internal controls for sustainability reporting

The LABORAL Kutxa Group has established a methodology for the preparation of sustainability information:

Each team/contributor is responsible for the quality of the information they provide. Along with the information, where applicable, it should explain the sources, origin, criteria and controls of the information reported.

Upon arrival of the information, the Sustainability Office reviews it for consistency and robustness.

The information generated by the Sustainability Office itself is reviewed by someone other than the person who produced it.

After finalisation of the sustainability statement it is submitted to the Board of Directors for validation prior to submission to the Audit Committee and oversight by the Governing Board.

At the end of 2023 the Internal Audit department conducted a one-off audit of the sustainability reporting process. Some recommendations and proposed action plans were concluded from the audit, such as to have a written manual or procedure in place, including:

- The definition and description of the processes required for the elaboration and validation of the content of the Sustainability Report and NFI
- The calculation methodology applied in the key and/or relevant indicators included in the Sustainability Report and the NFI
- Define both the controls and monitoring processes necessary to ensure the quality of the information included in the Sustainability Report and NFI

These recommendations have been incorporated from the outset in the preparation of this sustainability statement and the manual of the procedure for the preparation of the sustainability statement with the system of prioritisation of risks according to the material IROs is being drawn up. A new internal audit of the status is planned for 2025.

Finally, LABORAL Kutxa has a policy for the Disclosure of financial and non-financial information, the aim of which is to establish the procedures for the dissemination of the Entity's information, defining roles and responsibilities that guarantee its proper governance. This policy, last revised in December 2024, also determines the governance of the information to be disclosed.

[SBM-1] Strategy, business model and value chain

In 2022, a strategic reflection was carried out, which led to the drafting of a Strategic Plan for the years 2023-2024. The strategic deliberations at LABORAL Kutxa follow a management process that systematises competitive surveillance in the various markets and the review of business models and strategic commitments, which are then developed in each Management Plan.

The basic outline from the previous strategic plan was maintained, defining the following goals:

- **To grow in value in the entity's main businesses:** Mortgages, Commercial, Insurance and Off-Balance.
- **Drive the entity's transformation:** digitalisation, technology, cybersecurity, data analytics, supervisory demands, talent.

The programmes are layered in four large sections (Internal Governance, Profitable Growth of the Core Business, Business Accelerators and Transformational Capacity).



In the summer of 2023, an analysis of the evolution of the environment and the validity of the Strategic Plan was carried out, maintaining the basic structure and objectives of the Plan.

A novelty of this planning was the separation of Governance and Sustainability, which in the previous Plan formed a single cross-cutting programme. The main lines of action of the Sustainability programme have been:

- Aligning the sustainability strategy with Zentzua.
- Adaptation of the product catalogue in all lines of business.
- Transversal integration of environmental and climate-change risks, training.
- Reducing the activity's direct impact: consumption and work centres, accessibility of facilities, carbon footprint.
- Positioning and Communication of the product.
- Sustainability scorecard: KPIs and monitoring, including the RAS.
- Promotion of efficient housing (A, B).

Main challenges

Implement the Sustainability strategy, based on the conclusions of the deliberations on the Purpose of the entity (Zentzua), the corporate values, the commitments as a signatory of the Principles of Responsible Banking and the SDGs of the 2030 Agenda. Monitor initiatives and projects from a greenwashing perspective, including second and third lines of defence. On the other hand, also adapting the entity to ESG regulatory expectations, adapting the catalogue of green products, applying sustainability principles in means and people (including accessibility) and reducing the direct impact of the activity.

Risk management is a vital part of a financial entity. Some of the milestones achieved in this period have been:

- A heat map analysis of the ESG risks faced by our funding portfolio has been carried out.
- The ESG Financing, Investment and Underwriting Policy for the LABORAL Kutxa Group has been approved. This Policy clarifies exclusions, sectors considered sensitive and the management of disputes.
- The development of a catalogue of sustainable products has continued.

With regard to sustainability, the conclusions of the 2023 redirection have been:

- The awareness of the increase in the needs and resources required by reporting.
- The complexity of integrating ESG risks alongside other risks.

During the second half of 2024, work has been ongoing on a new 2025-2027 Strategic Plan, which will be validated and approved in early 2025. This new plan maintains sustainability as one of the Group's transversal axes of action, as well as other programmes related to material issues such as cybersecurity, customers and brand or talent and culture.

As for the major groups of products or services offered, being a financial institution, in the case of GLK these are the financial services provided to its customers. With regard to activities, products and services, they can be highlighted and classified as follows:

- Savings and investment. Includes customer deposits and off-balance sheet assets (mutual funds, EPSVs and pension plans).
- Financing:
 - Public sector: 8 %
 - National economies: 68% (66% mortgages, 3% consumer finance)
 - Companies/commercial: 19 %
- Life:
 - insurance: 30 %
 - Non-life: 70% (mainly households 25% and vehicles 37%)

Within the financing, a distinction is made between that granted to companies and that granted to private customers. This classification is also valid for customer groups and significant sectors:

- Financing for individuals: 72 %

- Business financing: 28 %

Within the year 2024 there have been no significant changes in this area.

In terms of markets, GLK only operates in the Spanish market.

The staffing table at year-end 2024 by geographical area is as follows:

| Provinces | Female | Male | Total |
|---------------------------|--------------|--------------|--------------|
| | 165 | 111 | 276 |
| Araba/Álava | 17 | 9 | 26 |
| Bizkaia | 47 | 22 | 70 |
| Gipuzkoa | 70 | 57 | 127 |
| Navarre | 13 | 12 | 25 |
| Rest of provinces | 18 | 11 | 29 |
| Asturias | 1 | 1 | 2 |
| Barcelona | 1 | 1 | 2 |
| Burgos | 2 | | 2 |
| La Rioja | 2 | | 2 |
| Madrid | 7 | 7 | 14 |
| Salamanca | 1 | 1 | 2 |
| Valladolid | 3 | | 3 |
| Zaragoza | 1 | 1 | 2 |
| PERMANENT CONTRACT | 1,138 | 974 | 2,112 |
| Araba/Álava | 76 | 82 | 158 |
| Bizkaia | 310 | 244 | 554 |
| Gipuzkoa | 443 | 328 | 771 |
| Navarre | 101 | 50 | 151 |
| Rest of provinces | 208 | 270 | 478 |
| Asturias | 19 | 28 | 47 |
| Barcelona | 6 | 12 | 18 |
| Bizkaia | 1 | | 1 |
| Burgos | 19 | 16 | 35 |
| Cantabria | 8 | 11 | 19 |
| Gipuzkoa | 2 | 5 | 7 |
| Huesca | 2 | 2 | 4 |
| La Rioja | 18 | 15 | 33 |
| León | 11 | 16 | 27 |
| Madrid | 28 | 43 | 71 |
| Navarre | | 1 | 1 |
| Palencia | 4 | 6 | 10 |
| Salamanca | 7 | 20 | 27 |
| Valladolid | 347 | 44 | 81 |
| | 1 | 1 | 2 |
| Zamora | 43 | 3 | 6 |
| Zaragoza | 42 | 47 | 89 |
| Total Spain | 1,303 | 1,085 | 2,388 |

On sustainability-related targets in terms of significant product groups and services, the GLK intends to increase the number of products with sustainable features offered to its customers. Today, there are several sustainability-related products such as ECO Loans or DispON ESG.

VALUE CHAIN

1.1. ACTIVITIES OF THE LABORAL KUTXA GROUP

With regard to inputs, the Laboral Kutxa Group carries out 4 main activities:

- Lending (financing) (representing 55% of the Entity's balance sheet).
- Financial investments (representing 31% of the balance sheet).
- Marketing of investment funds (IF), provident schemes (EPSV) and pension plans (PP) (representing 25% of creditor resources).
- Insurance marketing. Mainly home, auto and life (representing about 15% of the Group's results).

The actors required to carry out each activity of the Group (upstream and downstream) are described below.

1.1.1. LOANS GRANTED

UPSTREAM

In order to be able to carry out the lending activity, GLK needs to raise the necessary funds. At present, they are acquired exclusively through customer deposits, with no wholesale issues.

These funds come from companies and individuals, all of them highly atomised. In addition, GLK has a [Money Laundering Prevention Policy](#) to ensure the lawful origin of funds and to strictly comply with current legislation.

DOWNSTREAM

For the lending (or financing) activity, the most relevant actors are private customers, to whom 73% of loans are granted. Of these, 95% are for mortgages, while the remainder (5%) is for consumer loans. Due to its significant volume, mortgage lending is considered as one of the main elements of the value chain.

The remaining 27% of the activity lies in the commercial sector, whether self-employed, large companies, small and medium-sized enterprises (SMEs) or the public sector, with SMEs being the most prominent.

For the market area, the GLK has carried out an analysis of ESG risks, mainly environmental and climate change risks. This analysis has been translated into a heat map where the different activity sectors are classified according to risks, both direct and transitional. The result determines that the sectors with the highest environmental risk are electricity; oil and gas; land transport of goods; and maritime and air transport. These 4 sectors only represent 6.1% of the GLK's market investment, but, due to their climate and environmental risk impact, they will be considered within the value chain.

To support the sustainable financing of its business, the GLK has an [ESG Investment, Financing and Underwriting Policy](#). In this policy the GLK sets out the principles and criteria for aligning its financing with the promotion and support of a fairer and more sustainable economy and society. At the same time, a number of sensitive sectors that are not fully aligned with these principles and criteria are highlighted, restricted or excluded.

At the same time, the GLK also has a range of financing products to encourage its customers to make sustainable investments. For example, ECO loans, DispON ESG, loans related to renewable energies or to the rehabilitation of houses or buildings would fall into this range.

1.1.2. FINANCIAL INVESTMENTS

UPSTREAM

Fundraising is carried out in the same way as in the [lending activity](#), with no particularly relevant actors identified for the value chain.

DOWNSTREAM

As explained in the downstream part of the lending, the GLK has the [ESG Investment, Financing and Underwriting Policy](#), which is also applicable to the financial investments area.

In addition, there is an *ESG Treasury and Capital Markets Manual*, which establishes the specific ESG processes for the Treasury Area's financial investment activity. Finally, the GLK has an *engagement* service through which it talks to the entities in which it has made its investments to ensure that they take sustainability criteria into account.

As for the players, 96% of the portfolio is invested in fixed income securities and, within this, more than 90% is in Spanish public debt. Therefore, the Spanish state will be considered as an actor in the value chain. The rest of the financial investments, due to their atomisation and small volume, are of little relevance.

1.1.3. MARKETING OF INVESTMENT FUNDS (IF), PROVIDENT SCHEMES (EPSV) AND PENSION PLANS (PP)

UPSTREAM

The management companies are part of the GLK. Their marketing is carried out through the sales channels of the LABORAL Kutxa network. To market IFs, EPSVs and PPs, the GLK acts as an intermediary to invest its customers' money in the financial markets. In making these investments, the GLK has the aforementioned [ESG Investment, Financing and Underwriting Policy](#), which takes sustainability criteria into account. There is also the [Laboral Kutxa Group's Sustainability Risk Integration Policy \(ESG\)](#), which goes even further in taking ESG criteria into account when making financial investments. This means that the vast majority of the GLK's investment funds are considered as Article 8 in the NFRD, i.e. they take sustainability features into account, in addition to having a certain percentage of sustainable investment. Engagement work is also carried out in the same way as for financial investments.

DOWNSTREAM

The GLK markets IFs, EPSVs and PPs to its highly fragmented retail clientèle. Marketing is carried out in accordance with MIFID regulations which ensure the highest level of clarity and transparency in its sale. Prior to this, the MIFID questionnaire is carried out, which asks about sustainability preferences. Then, based on the responses, each customer is assigned a specific profile and offered financial products that are suitable for them.

1.1.4. INSURANCE MARKETING

UPSTREAM

The insurance group Seguros Lagun Aro is also part of the GLK. In order to serve its customers who have suffered a claim or require a service, it has agreements with various repairers. Given the weight of these branches, the main ones are those related to vehicles (workshops, tow trucks, etc.) and household (electricians, tradesmen, plumbers, etc.).

In addition, it also contracts with a number of reinsurers to cover part of the risk it is taking on with its customers.

DOWNSTREAM

These are individual customers who take out insurance, whether life, home, auto or some other type of insurance.

The GLK has the [ESG Investment, Financing and Underwriting Policy](#) which limits or restricts underwriting in certain sectors contrary to the GLK's sustainability criteria and principles.

Moreover, the GLK has a portfolio of ESG insurance products aimed at insuring its customers' assets that are related to sustainability: insurance for electric or plug-in hybrid vehicles, electric bicycles or scooters, and home insurance for vulnerable groups.

Another relevant aspect is that it also markets insurance through a network of brokers. This is a group of external agents who distribute Lagun Aro insurance products independently of the banking channel. This marketing channel accounts for 26% of the premiums sold.

1.2. OTHER CROSS-CUTTING ACTORS AND PARTNERS

Beyond the actors referred to for each main activity of the GLK, there are also others that are cross-cutting and essential for the performance of all these activities and that must be considered within the value chain.

WORKFORCE

The employees of the GLK enable the performance of all of the Entity's activities. In the particular case of the GLK, as a labour credit cooperative, more than 80% of the workers are in turn owners of the institution. The rest are employees. This labour structure that originates from its legal composition determines levels of involvement in management, transparency in communication and salary differences that are considerably different from those of other entities.

PARTNERS

LABORAL Kutxa is a credit cooperative, hence most of the members of staff are in turn partners or owners of the Entity. There are also other partners or owners, who are the associated cooperatives, private individuals (customers) and part of the retired staff (collaborators).

SUPPLIERS

The GLK requires the services provided by its suppliers in order to carry out all of the above activities. These suppliers are numerous and varied, although three categories can be highlighted: IT/technology, marketing/market analysis and consultants. These three categories are joined by basic services: electricity, security, cleaning... Within the third party management process, some outsourcings are classified as essential.

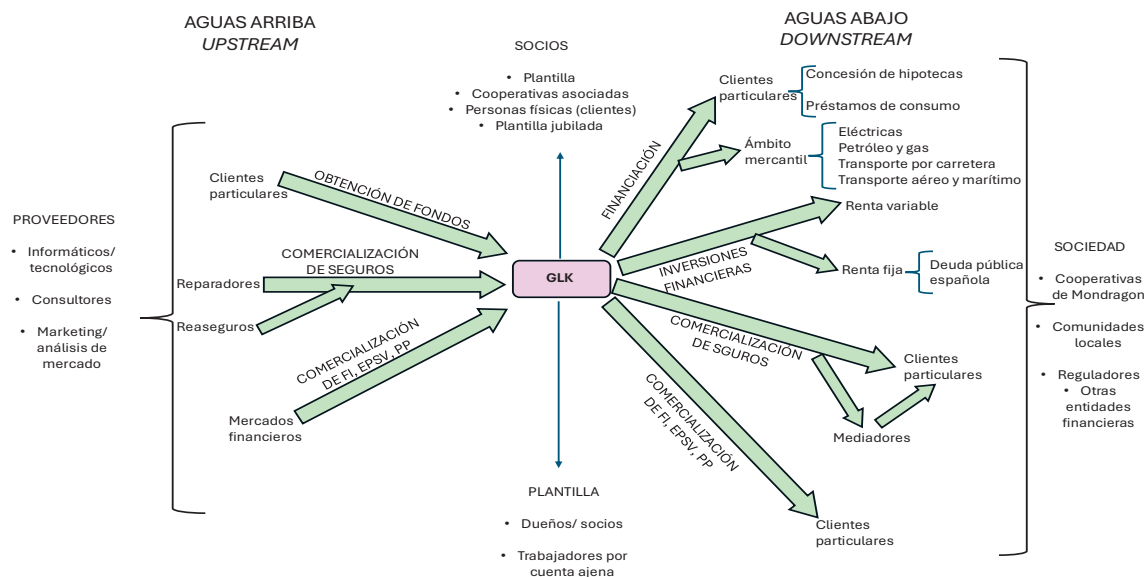
It is worth mentioning that the GLK takes sustainability into account when dealing with its suppliers. On the one hand, it has the [Sustainable Purchasing Policy implemented in Laboral Kutxa](#), which guarantees the use of ESG criteria when making purchases. In addition, suppliers are sent a questionnaire prior to contracting, in which they are consulted on various sustainability-related issues.

It is worth noting that 95% of the suppliers are local.

SOCIETY

This section includes a number of stakeholder groups, among which the following stand out:

- Other Mondragon cooperatives, which own part of the GLK's capital and with whom they share cooperative and social transformation values.
- Local communities. As a credit cooperative, the GLK aims to contribute to the progress and development of the societies in which it operates.
- Regulators. In a sector as regulated as the financial sector, the perspective of regulators, both Spanish (Bank of Spain or the CNMV) and European (Bank of Spain, EBA, EFRAG, European Parliament...), is relevant. This perspective of regulators is particularly relevant for ESG issues.
- Other financial institutions. As a member of the Spanish financial system, the GLK maintains a relationship with, cooperates with and monitors other financial institutions, especially those closest to it geographically.



[SBM-2] Stakeholders' interests and views

LABORAL Kutxa is a worker-owned credit cooperative. It is therefore a financial institution borne from the social economy in which the share capital is in the hands of other Mondragon cooperatives, the staff (current and retired) and the customers. LABORAL Kutxa's founding objective is to contribute to the fair creation of wealth in its environment.

As part of the reflection, called Zentzua, on the purpose of the cooperative, which culminated in 2023 and served to update the cooperative's hallmark and legacy, the following statement was defined: To build more prosperous, egalitarian and sustainable communities, expanding a cooperative culture of solidarity and co-responsibility.

The objectives and plans put in place as a result of Zentzua are structured around three pillars:

- People (staff)
- Customers
- Company

These pillars, together with the necessary financial soundness, constitute the basis on which the strategic plan has been structured, as shown in the diagram in section "SBM-1" above.

The people who work at LABORAL Kutxa are members and owners of the cooperative with full rights and duties, both in the observation of their professional duties and in the right to participate in the management and results of the company. This difference compared to other companies defines the approach to the relationships within the company, meaning that workers are involved in all three of the possible areas: ownership, results and also management methods, because our aim is to make our management democratic and responsible. Specifically, the key decisions are validated at the General Meeting with the participation of all partners, guaranteeing an efficient and responsible management that allows us to obtain profits and reinvest them in our society.

With regard to customers, LABORAL Kutxa's mission states that "LABORAL Kutxa and the people who are part of the credit cooperative are committed to offering our customers a close, professional and honest financial and insurance service that helps them to achieve their goals and well-being. We will do this by developing a bank with values, one that is competitive, solvent and profitable in the long term, always with the aim of leaving an improved legacy for future generations."

LABORAL Kutxa was founded in the Basque Country as part of a business group with a strong commitment to serving society, whose mission includes the creation of associated and participative work of a cooperative nature, as an essential way of creating wealth and well-being, both among its direct members and in the society in which it is immersed. Due to its legal nature and its cooperative vocation, LABORAL Kutxa directs a significant part of its profits to the promotion of the cooperative world, but it also reserves specific headings for numerous local initiatives in the territories where its offices are located.

The process of identifying materiality issues has taken into account the interests and views of these stakeholders at various points in time:

- Within the value chain analysis
- In the external analysis, such as when analysing market trends or assessing the relevance given to different topics by experts and analysts.
- In the internal analysis: strategic plan, Zentzua, various policies, ...
- In stakeholder consultation. All three stakeholders have been consulted and have provided their views.

For more information on the GLK's stakeholders and how their interests have been analysed during the dual materiality assessment process see section "IRO – 1: Stakeholders".

The results of this dual materiality analysis were presented to the Sustainability Committee in 2024.

In parallel, further information is disclosed under sections SBM2 of NEIS S-1 Own personnel and NEIS S-4 Consumers and end-users.

Having described the interests and opinions of concerned parties in a general manner, the interests and opinions of different stakeholder groups will be specified in a more specific and individualised manner.

Own personnel (S1)

In relation to the direct activity of LABORAL Kutxa with respect to its own workers, the legal cooperative status is an ambitious development of the inspiring principles of the Universal Declaration of Human Rights, namely that all human beings are equal in dignity and in rights.

Indeed, the cooperative form implies that the people who work in the company are partners with equal rights and obligations, regardless of their position within the organisational hierarchy, and that by being owners we pursue a twofold performance: professional and cooperative. This dual condition calls on us as professionals to be self-demanding, striving to improve on a daily basis, and requires us to have the kind of relationships and internal connections that are typical of a highly connected and participative organisation:

- We participate in the work itself, in the capital, the results, and the governance.
- This participation drives us to grow as people.

All of this requires that we work to make ours a good place to work, a positive working environment where people are valued, where we feel that we are listened to and receive recognition for our achievements.

An environment that also favours a **balance between personal and professional life**, that cares for the **well-being** of its people, one which fosters **teamwork**, and where there is an **equitable distribution of wages** that contributes to building a fairer, richer and more empowered society.

We are committed to a cooperative project that goes beyond our time, assuming the duty to pass on this improved legacy, and this means that we put the global interest and the strengthening of the cooperative project at the forefront of our long term vision.

In this respect, prudence and the long term are very much a priority when making decisions. We are prudent in our risk-taking, we engage in long-term planning to ensure the sustainability of our results, we make provisions, and we take care of our solvency.

We are a **cooperative bank**, a different way of doing business, while also being competitive and profitable, we do so in accordance with our principles, so that everyone in the organisation feels proud of our cooperative values, of how we achieve our objectives and of what we contribute to the society of which we are a part.

In the area of people, the most significant risks linked to non-compliance with human rights are related to corruption and harassment at work.

- On corruption, see section G1-3 [G1-3] Prevention and detection of corruption or bribery.
- With regard to harassment in the workplace, it should be noted that this is a problem with a low quantitative incidence, but a potentially serious effect on the people who might be involved in a situation of this kind. In terms of procedures, there is a set of protocols for dealing with situations of harassment at work:
 - Moral Harassment Protocol updated on 03/11/2023.
 - Protocol against sexual harassment and gender-based harassment update on 03/11/2023.
- In organisational terms, the Ethics Committee is responsible for studying and assessing cases.
- Communications and/or complaints relating to situations of harassment are received through the Entity's Whistle-blowing Channel

The financial activity we carry out, the geographical scope of our activities and the ownership structure make it impossible for threats of violation of the provisions of the fundamental conventions of the International Labour Organisation to occur.

Seguros Lagun Aro also has a protocol against sexual harassment and gender-based harassment that regulates the procedure for resolving claims and complaints in relation to this type of situation, and establishes prevention mechanisms through awareness-raising, training and information. The protocol was updated in 2023 in accordance with the regulations in force.

Consumers and end-users (S4)

The Entity has several processes in place to learn about and consider the interests and opinions of consumers and end-users. Specifically, these are four different processes based on surveys, where information is obtained on customer preferences and what they think about the institution. Section [S4-2] Processes for involving end-users and consumers in impacts, explains in further detail how the entity collaborates with consumers and end-users in relation to the material impacts or issues detected in the dual materiality process. Each of these processes is explained below:

- Customer satisfaction survey:

This is a survey conducted every six months among the bank's customers. The objective is to know the overall level of customer satisfaction with the bank, as well as their satisfaction with the service and advice offered in branches and through channels to customers of different profiles: private and commercial financial customers, insurance customers, etc. A broad client base is consulted for their opinion.

DATA 2024

- Clients consulted: 29,850
- Overall satisfaction with LK: 80.7/100

- Survey of relational moments:

Survey on customer satisfaction at different points in the relationship with Laboral Kutxa, in branches and via online banking, such as when registering as new customers, offering and contracting products, etc.

The survey considers the following aspects: overall rating of the experience, rating of the process (simplicity, information, advice...) and suitability of the product to their needs.

DATA 2024

- Clients consulted: 18,159
- Overall satisfaction with LK: 8.83/10
- Rating of the experience: 8.91/10.

- National report: Benchmarking of customer satisfaction in the financial sector:

Study carried out on the initiative of an external company (Stiga) with the aim of having a comparative framework of the level of satisfaction and commitment of customers of financial institutions operating in the Spanish market.

The study analyses customer satisfaction with the different customer service channels (Branch / On-line Banking and APP / ATMs / Telephone Banking) as well as their rating of the Offer, Information, Relationship Intangibles and brand of each entity.

DATA 2024

- LABORAL Kutxa Group customers consulted: 14,400
- Overall satisfaction with LK: 7.74/10

- *Tracking* of our brand image:

A study carried out for the institution by the company Ikerfel, asking consumers (customers and non-customers) about the image they have of financial institutions and their performance in aspects such as customer relations, values, commitment to society and offer.

The objective is to know to what extent the entity's performance is consistent with our brand values and the entity's purpose.

These customer satisfaction studies and the brand image tracking are presented annually to the Board of Directors and the Governing Board.

The results of these reports allow to identify customer needs, new products and services to offer as well as areas for improvement in the service we provide in branches and via other channels. The main customer demands are incorporated as lines of action in the Annual Management Plan.

On the other hand, related to the IRO of the inclusion of consumers or end-users, in 2023 Ilunion carried out an accessibility diagnosis for LABORAL Kutxa. This diagnosis was comprehensive and covered all customer relation channels. Therefore, it included the physical channel (branches), as well as the telephone, online and ATMs. Two of the main sales processes were also analysed; those of opening accounts and taking out mortgages. In order to carry out the diagnosis, both expert auditors and users were involved. The objectives sought by Ilunion were:

- To understand the needs and demands of people with disabilities and/or the elderly in order to improve their customer experience with Laboral Kutxa in its process map: interaction with the various communication channels (physical, telephone and back office, and online); the provision of services; and the attention provided by banking professionals.
- Identify the features and functionalities that need to be integrated into current interaction channels to enable them to provide an equal service to customers with disabilities (physical, visual or hearing) and/or elderly customers.

To achieve this, the following were carried out:

- User test: Usability testing based on observation and analysis of how individual users use services and products.
- Mystery shopper: Study of the actual behaviour of customer services.

Following the diagnosis phase, a report and an improvement plan were drawn up and are in the process of being implemented.

Cybersecurity and data processing (C1)

The banking sector, due to the nature of its planning and operations, as well as the sensitivity of the information it handles, faces very specific cybersecurity challenges.

LABORAL Kutxa understands cybersecurity and data protection as a strategic objective that allows it to reinforce its reputation and maintain a high level of trust on the part of its customers, which it achieves through:

- Implementing a **cybersecurity culture** across the entire entity.
- **Investment in resources and new technologies** that protect its systems and data and can detect and respond to attacks.

- **Collaboration with authorities and third parties** for the creation of a common knowledge base of new threats and emerging risks in the sector.

Considering the growing trend of cyber-threats, it is imperative to strengthen the connection between sustainability and cybersecurity as an integrated approach to help safeguard the health of the organisation and its employees, the future of the business and the interests of its stakeholders (customers and business partners).

[SBM-3] Material impacts, risks and opportunities and their interaction with the strategy and business model

Following the materiality analysis, the following material impacts (I), risks (R) and opportunities (O) have been identified:

| Sustainability topics | Sustainability sub-topics | Material IROs | IROs | Value chain | Time horizon |
|-------------------------|---|---|-------------|-------------------|------------------------|
| Climate change | Adapting to climate change | Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements. | Impact | Subsequent phases | Short term |
| | | Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services. | Impact | Subsequent phases | Short term |
| | | Progressive exclusion from the market of those participants with a higher physical and/or transitional risk. | Impact | Subsequent phases | Short term |
| | | Financing for companies to enable them to transition to more environmentally sustainable models. | Opportunity | Subsequent phases | Medium/Long term |
| | Climate change mitigation | Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.) | Risk | Subsequent phases | Long term |
| | | Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented. | Risk | Subsequent phases | Long term |
| | | Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to subsequent increases in energy costs for cooling or heating homes. | Risk | Subsequent phases | Long term |
| | | Financing for companies to enable them to transition towards more lower impact models. | Opportunity | Subsequent phases | Medium/Long term |
| Own workers | Working conditions | Worsening of staff welfare due to inadequate working conditions. | Impact | Own operations | Short term |
| | | Improved staff welfare through optimal working conditions. | Impact | Own operations | Short term |
| | Equal treatment and opportunities for all | That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect. | Impact | Own operations | Short term |
| | | Loss of motivation and productivity in the workforce because they feel conditioned by their gender, origin, race, sexual orientation or any other aspect. | Risk | Own operations | Short/medium/long term |
| Consumers and end-users | Incidents related to information destined to consumers or end-users | Unclear explanations provided to customers, concealment of information or sale of unsuitable products. | Impact | Subsequent phases | Short term |
| | | Clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. | Impact | Subsequent phases | Short term |
| | | Customer loyalty by providing clear, precise and transparent explanations of financial products, their conditions and the costs involved. | Opportunity | Subsequent phases | Short/medium/long term |
| | | Achievement of a good reputation in society and in the sector for providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. | Opportunity | Subsequent phases | Short/medium/long term |
| | | Legal certainty by providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. | Opportunity | Subsequent phases | Short/medium/long term |
| | Social inclusion of consumers or end-users | Catering to the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or any other aspect. | Impact | Subsequent phases | Short term |
| | | Customer loyalty and retention by meeting their needs regardless of their gender, origin, race, age, sexual orientation or any other aspect. | Opportunity | Subsequent phases | Short/medium/long term |

| Sustainability topics | Sustainability sub-topics | Material IROs | IROs | Value chain | Time horizon |
|-----------------------------------|---------------------------|---|-------------|-------------------|------------------------|
| | | Gaining more customers by serving their needs regardless of gender, origin, race, age, sexual orientation or any other aspect | Opportunity | Subsequent phases | Short/medium/long term |
| Corporate culture | Corruption and bribery | Carrying out cases of corruption or money laundering through LABORAL KUTXA channels or products. | Opportunity | Own operations | Short term |
| | | Training of staff to avoid any scenarios of corruption or money laundering. | Impact | Own operations | Short term |
| Cybersecurity and data processing | Entity specific | Plundering of customers' personal data or savings due to fraudulent activities, fraud or scams. | Impact | Subsequent phases | Short term |
| | | Training staff to respond appropriately to cyber-attack attempts to protect customer data and deposits. | Impact | Own operations | Short term |
| | | Resilience of the institution to hostile actions by cyber-criminals. | Impact | Own operations | Short term |
| | | Economic or operational losses for LABORAL KUTXA as a result of attacks or malicious activities. | Risk | Own operations | Short/medium/long term |
| | | Attacks on own technological infrastructure with operational, service or economic impact. | Risk | Own operations | Short/medium/long term |
| | | Loss of customers through plundering of their personal data or savings due to cyber-attacks. | Risk | Subsequent phases | Short/medium/long term |

With regard to the financial effects of the risks and opportunities mentioned above, the entity has made an economic assessment, although it has not detailed the exact effects of each of them.

As can be seen in the diagram provided in section SBM 1, the resulting sub-topics have been identified by LABORAL Kutxa and are included in the strategic plan and business model.

To begin with, the Zentzua project, which influences the areas of people (employees), customers and society, is at the core of the company's strategy. It is therefore related to and serves as leverage for all the IROs identified in the themes of own workers; consumers and end-users; and corporate culture. Furthermore, Zentzua is a dynamic project that is fed by different inputs, so the IROs detected in these sections will serve to reshape the project and thus directly affect the strategy, since all the entity's decisions pass through the filter of what is indicated in Zentzua.

One of the main challenges is to deploy the Sustainability strategy, which, among other aspects, contains the adaptation of ESG regulatory expectations. These expectations, which are mostly related to the environment, influence all the IROs identified under the climate change topic.

Finally, due to the incorporation of the DORA regulation, the entity is obliged to work on IROs related to cybersecurity and data processing.

With regard to material issues

The relatively material impacts identified that could directly affect people or the environment are:

- Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements. I
 - Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services. I
 - Progressive exclusion from the market of those participants with a higher physical and/or transitional risk. I
- Worsening of staff welfare due to inadequate working conditions.

Potential impact on the workforce mitigated by the cooperative structure and the various policies and programmes in place.

- That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect.

Potential impact on the workforce mitigated by the cooperative structure and the various policies and programmes in place.

- Unclear explanations provided to customers, concealment of information or sale of unsuitable products.

Impact on clientèle with potential economic losses or unwanted risk-taking.

- Clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved.

Impact on clientèle with appropriate management of their assets, consequently gaining their trust and establishing long-term relationships with them.

- Catering to the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or any other aspect.

Impact on the clientèle and on society, which sees its rights met.

- Carrying out cases of corruption or money laundering through LABORAL Kutxa channels or products.

Potential impact on society.

- Training of staff to avoid any scenarios of corruption or money laundering.

Impact on the workforce, enabling better management and prevention of infringements with a social impact and which may result in sanctions for the Group.

- Plundering of customers' personal data or savings due to fraudulent activities, fraud or scams.

Impact on the clientèle with economic losses or unwanted risk-taking.

- Training staff to respond appropriately to cyber-attack attempts to protect customer data and deposits.

Impact on the workforce, enabling better management and prevention of infringements with a social impact and which may result in losses and sanctions for the Group.

- Resilience of the institution to hostile actions by cyber-criminals.

Impact on people and staff by improving information and operational security.

[IRO-1] Description of the process for identifying and assessing material impacts, risks and opportunities

The process of dual materiality analysis and assessment of material impacts, risks and opportunities (hereinafter "IROs") was amended in 2024 to align with the regulatory requirements of the CSRD and will be reviewed again during the 2025 financial year.

In 2024 the analysis was validated by both the sustainability office and the Sustainability Committee. In addition, in early 2025 the materiality analysis was validated by the Board of Directors and approved by the Governing Board.

The process of identifying and assessing the impacts, risks and opportunities followed by LABORAL Kutxa involved five phases, which are described below.

PHASE 1. CONTEXT ANALYSIS

The context analysis is established as the first step in the study of dual materiality. It is divided into four parts:

1. Definition of the value chain
2. Definition of the stakeholders
3. Internal analysis
4. External analysis

Based on the results of the context analysis, a preliminary list of potentially material sustainability issues (ESRS) has been drafted in [phase 2](#).

VALUE CHAIN

The aim of this point is to identify the value chain of the Laboral Kutxa Group (hereinafter “GLK”), understood according to the EFRAG definition, as the set of activities, resources and relationships that the Group uses and on which it bases its focus when creating its products or services, from conception to delivery, consumption and the end of their useful life. (See further breakdown in “SBM – 1”).

Based on the analysis carried out, the issues are determined and prioritised according to their relevance (scored from 1 to 4) for the Entity and the sector, adapted to the particularities of the GLK, its impacts, risks and specific characteristics.

STAKEHOLDERS

IDENTIFICATION OF THE STAKEHOLDERS

Stakeholders are all interested parties that may affect or be affected by the GLK’s activities (identified in [section 1.1.](#)).

LABORAL Kutxa has defined and explained the stakeholders in its [Sustainability Policy](#), and they are also included in the [NFI-sustainability report](#), where they can be consulted. In addition to the four stakeholders (staff, customers, suppliers and society), the Sustainability Report also includes the environment, which, although it is not a stakeholder as such, has certain particularities that make it worthy of attention. Some of the stakeholder groups are subdivided for better understanding and management:

WORKFORCE

Above all, the workforce is the main driver of strategy fulfilment and the key to ensuring the sustainability of the business. The dual role of the staff as workers and as members of the cooperative has historically been a differentiating factor that has allowed the financial and insurance activity to be developed in a more sustainable manner.

CUSTOMERS

The Group aims to build long-term relationships based on ethics and trust with its customers, to adapt to their needs by providing them with quality products and services that meet their expectations and contribute to fair and sustainable development, and to improve their satisfaction through excellence in service quality.

Since the needs and expectations of the customers vary, they have been grouped into three main segments:

- Linked private customers.
- Business customers.
- Self-employed and micro enterprise customers.

SUPPLIERS

The GLK has in its suppliers the necessary and indispensable counterpart for the provision of its services. It is also aware of the traction it has to encourage its supplier companies on the path towards increasingly socially and environmentally sustainable performance.

More information on suppliers is available in [section 1.2](#).

SOCIETY

The GLK is based on a business model that is closely linked to the community, which is why it seeks to integrate, promote and proactively contribute to equity and to the economic, social and cultural progress of the territories where it operates.

The GLK maintains numerous channels of communication with society through which it aims to learn about their needs and expectations. These channels are explained in the Sustainability Report.

Similarly, the GLK returns a very high percentage of its annual distributable profits to society. Specifically, 25% is returned to society either directly or through Mondragon's inter-cooperation mechanisms.

It also belongs to numerous associations and participates in social initiatives.

Society's interest group is very heterogeneous, so some of its more specific components are described:

REGULATORS, IN PARTICULAR THE BANK OF SPAIN (BdE)

The GLK's financial and banking activity is highly regulated and subject to standardisation. In the case of the GLK, the Bank of Spain (BdE) is responsible for the supervision of these regulations and standards. Dialogue with the supervisor is continuous through meetings, letters and inspections. In particular, with regard to ESG aspects, it has published regulatory expectations focused on the incorporation of climate and environmental risks into the rest of the risks.

As explained in the description of the value chain, there are numerous regulators and supervisors that set mandatory standards for the GLK.

MONDRAGON AND ITS ASSOCIATED COOPERATIVES

The GLK is part of the Mondragon cooperative business group. The GLK has been part of Mondragon, along with other cooperatives, since its inception, and it also channels a significant part of its profits to the former. Mondragon's cooperatives participate in the GLK's capital, share its values and are also clients (the cooperatives and their staff) of the GLK.

LOCAL COMMUNITIES, SOCIAL ORGANISATIONS, UNIVERSITIES, ...

The GLK maintains a particularly close dialogue with certain representatives of society. These actors make it possible to learn about what society needs and expects from them. Some, such as the university, provide knowledge on innovative elements, problems detected, etc. Others, such as social organisations, are representatives of specific or disadvantaged groups.

While these are not mutually exclusive classifications, it is relevant to differentiate, among stakeholders, between:

- Those whose interests are or may be affected, positively or negatively, by the company's activities and its direct and indirect business relationships along its value chain. This would include staff, customers, suppliers and cooperatives.
- Primary users of financial information in general and other users of sustainability statements, including business partners, trade unions and social partners, civil society and non-governmental organisations, governments, analysts and academics. They would be the regulators, social organisations, universities...

This identified the stakeholders to be consulted in phase 3.

EXTERNAL ANALYSIS

The objective of this part is to understand the situation of the GLK's external environment, and the sustainability issues that are identified as relevant. To this end, the main macro- and micro-level trends in the sector have been analysed, as well as best practices across the market. To complete this external understanding, an analysis has been carried out of regarding the current regulatory trend and where regulators are pushing markets.

3.1. MARKET TRENDS

The main trends in the financial sector are analysed. The GLK's specific operations have also been taken into account, considering that it operates exclusively in the north of Spain, especially in the Basque Country and Navarre, hence local rather than global trends are more relevant. For example, a particularly relevant element for the GLK is the ageing of the population and its implications for commercial activity, the mortgage market, attracting talent...

The market's view on sustainability clearly emphasises that sustainability issues will continue gain importance.

Finally, the main impacts of sustainability risks are: political, economic, social, technological, environmental, legal and regulatory.

Based on the analysis carried out, the issues are determined and prioritised according to their relevance for the Entity and the sector, adapted to the particularities of the GLK, its impacts, risks and specific characteristics.

3.2. REGULATORY ANALYSIS

The regulatory analysis is of the utmost relevance for understanding the external environment. In addition to the different sustainability laws in force that apply to the sector, the draft laws that are currently in the process of being approved have also been analysed.

As explained above, the LABORAL Kutxa Group carries out all its operations in Spain and is the largest financial institution supervised by the Bank of Spain.

In addition, the GLK is subject to the European regulatory framework. In recent years, the generation of ESG legislation and regulations has been abundant (Sustainable Finance Action Plan and Green Pact) and its adaptation is entailing great effort.

As can be seen, the main obligations for the banking sector are in areas such as:

- The obligation of transparency and reporting on the sustainability of the balance sheet and financial products.
- Incorporation of sustainability risks (climate change and value chain) into the rest of the traditional financial risks.

The GLK participates or has participated in the Principles for Responsible Banking (PRB), TCFD and Pillar 3 standards.

Based on the regulatory analysis performed, the level of relevance of the issues is determined.

3.3. MARKET BENCHMARK

A *benchmark* has been conducted to understand the material market trends in the sector.

3.4 EXPERTS AND ANALYSTS

To complement the external analysis, the importance that analysts (leading international sustainability standards and ESG rating agencies) attach to each topic and sub-topic previously identified is incorporated.

For this purpose, the views of three rating agencies have been used to obtain the following issues relevant to the banking and insurance sector:

S&P (banks+insurance industries have been considered, giving them a weight): [Weights Overview Corporate Sustainability Assessment \(spglobal.com\)](https://www.spglobal.com/ratings/en/weights-overview)

- Governance
- Risk management
- Business ethics
- Climate strategy

- Human capital management
- Sustainable finance
- Decarbonisation strategy
- Work practices
- Financial inclusion

MSCI (Financials sector has been considered, giving them a weight, sub-industries: diversified Banks, regional Banks, Commercial & residential mortgage finance, Multi line insurance): [ESG Industry Materiality Map - MSCI](#)

- Financing of environmental impact: Risk integration and product and service development
- Vulnerability to climate change
- Human capital development
- Data privacy and security
- Consumer protection
- Accessibility to financial products
- Responsible investment
- Governance: business ethics, remuneration, taxation, ...

SASB (Financials, relevant topics from the industries Commercial Banks, Consumer finance, Insurance, Mortgage Finance, Asset management -& custody activities): [Find Industry Topics - SASB \(ifrs.org\)](#)

- Data privacy and security
- Accessibility to basic financial services
- Incorporating ESG considerations into products and services
- Business ethics: fraud, corruption...
- Integration of systemic risks, including ESG.
- Responsible selling: transparency, greenwashing, non-discrimination...
- Physical impact of climate change.
- Human capital management: diversity, integration,...

For the analysis of the potentially material topics and sub-topics of the external analysis, the above-mentioned information and documentation has been analysed and adjusted to a scale of 1 to 4, where 1 is no impact and 4 is high impact.

INTERNAL ANALYSIS

A context analysis has been carried out to understand the GLK's internal positioning in relation to the topics and sub-topics, i.e. which sustainability topics and sub-topics the entity considers relevant prior to materiality. The purpose of this phase is to align with the Entity's internal policy and positioning.

The following internal LABORAL Kutxa Group documents related to sustainability have been used as sources of information:

1. Zentzua
2. Strategic redirection of sustainability (06-24)
3. 2024 Sustainability Management Plan
4. 2023 Sustainability Report
5. TCFD/TNFD
6. Principles for Responsible Banking (PRB) template. Impact analysis
7. Sustainability policy
8. Environmental policy
9. Sustainable Purchases policy
10. Occupational health & safety policy
11. Reputational risk
12. CLAR-ESG. Analysis of the loan portfolio

For the analysis of the potentially material topics and sub-topics of the internal analysis, the above-mentioned information and documentation has been analysed. Depending on whether sustainability issues are present in the documents, a different score has been applied:

- If sustainability issues are present in the documents, they have been assigned a score of 3 points.
- If sustainability issues have a superficial presence, they have been assigned a score of 1 point.
- If sustainability issues have no presence or have presence to mention that they are not relevant, no score has been assigned to them.

Thus, each sustainability issue has been reviewed bearing in mind the above-mentioned documents and will therefore be eligible for a maximum score of 36 points. In order to determine the relevance of issues for the GLK and to make it homogeneous with other scores, the following ranges are established:

- Over 27: 4
- Between 19 and 27: 3
- Between 10 and 18: 2
- Less than 10: 1

PHASE 2. PRELIMINARY LIST OF POTENTIALLY MATERIAL TOPICS AND SUB-TOPICS

Based on the results of the context analysis, a preliminary list of potentially material sustainability issues (ESRS) has been drafted in [phase 2](#).

Preliminary result:

The average of the relevance scores gives a rating to each sub-topics (if any). The criterion of not considering topics with an average of less than 3 (out of a maximum of 4) has been determined. The result is the following list of preliminary topics, also incorporating stakeholder consultations:

| Ámbito | Tema | Subtema | Subsubtema |
|----------------|---------------------------------|--|--|
| MEDIO AMBIENTE | Cambio climático | Adaptación del cambio climático | NA |
| | | Mitigación del cambio climático | NA |
| SOCIAL | Personal propio | Condiciones de trabajo | Empleo seguro |
| | | | Tiempo de trabajo |
| | | | Salarios adecuados |
| | | | Diálogo social |
| | | | Libertad de asociación, la existencia de comités de empresa y los derechos de información, consulta y participación de los trabajadores |
| | | | Negociación colectiva, incluida la proporción de trabajadores cubiertos por convenios colectivos |
| | | | Conciliación laboral |
| | | | Salud y seguridad |
| | | Igualdad de oportunidades para todos | Igualdad de género e igualdad de remuneración por un trabajo de igual valor |
| | | | Formación y desarrollo de capacidades |
| | | | Empleo e inclusión de las personas con discapacidad |
| | | | Medidas contra la violencia y el acoso en el lugar de trabajo |
| | | | Diversidad |
| SOCIAL | Consumidores y usuarios finales | Incidencias relacionadas con la información para los consumidores o usuarios finales | Ejemplos: Privacidad Libertad de expresión Acceso a la información (de calidad) |
| | | Inclusión social de los consumidores finales | Ejemplos: No discriminación Acceso a productos y servicios Prácticas de marketing responsables |
| GOBERNANZA | Conducta empresarial | Cultura corporativa | Incluye: Lucha contra la corrupción y el soborno / Prevención y detección, incluida la formación, casos Protección de los denunciantes Bienestar animal |
| TRANSVERSALES | Específicos sector | Ciberseguridad y tratamiento de datos | NA |
| | | Finanzas sostenibles | NA |

PHASE 3. STAKEHOLDER CONSULTATION

Following on from the identification of stakeholders in Phase 1, the aim of Phase 3 has been to understand the perspective of the different stakeholders on the ESRS topics and sub-topics in order to include the issues that are relevant to them in the results matrix for Phase 2. In addition, the results obtained in this consultation phase have been used to include in the dual materiality assessment tool the degree of relevance of each issue (in Phase 5 of the process).

It is worth mentioning that this phase has been carried out in parallel to the previous one and the results obtained have been used to obtain the preliminary result of topics and sub-topics.

The results of the questionnaire for each of the segments have been ranked from 1 (minus) to 4 (plus) priority according to the average rating obtained.

PHASE 4. IROS IDENTIFICATION AND VALIDATION

In this phase, the GLK has identified potentially material IROs related to the ESG and entity-specific topics and sub-topics that have been pre-selected in [phase 2](#), both in the operations themselves and in the value chain upstream and downstream. The result is a list of impacts, risks and opportunities for further assessment and analysis in [phase 5](#) of the process.

It is worth mentioning that “entity-specific” IROs have been identified, i.e. material issues have been identified which, although not covered by the NEIS, have been considered relevant for the GLK in its analysis, such as cybersecurity and data processing.

For each of the identified IROs, the following is specified:

- Type: impact, risk or opportunity.
- Subtype: positive, negative, reputational...
- Whether actual or potential.
- Their impact on the value chain. *Downstream, upstream or core.*
- Source: internal, external or from stakeholder consultation.
- Their relationship with the ESRS.

PHASE 5. IROS EVALUATION AND FINAL MATRIX

The last phase of the dual materiality process consisted of the assessment of these IROs, identified in Phase 4. Through this assessment, the material IROs were determined and, consequently, the material topics and sub-topics have also been determined.

Impact materiality and financial materiality are analysed separately.

Impact materiality:

In the impact materiality: the following elements have been taken into account:

- Whether it is a positive or negative impact. In the event of a negative impact, its possible remedy is also measured.
- Whether it is an actual or potential impact. In case of a potential impact, the probability is also considered.
- Its scope is also measured.
- To all this, the assessment obtained from the stakeholder consultations is added, assigning them different weights.
- With the above evaluations, scores (between 0 and 4) have been obtained for each impact. Those which have **obtained a score of more than 2 will be considered as material impacts**.

Financial materiality:

In the financial materiality: the following elements have been taken into account:

- Economic valuation in the short, medium and long term.
- Probability in the short, medium and long term.
- As in the case of impact materiality, the financial materiality has also taken into account stakeholder assessments, although with different weightings, including a session between the Sustainability Office and the CFO (member of the Board of Directors).

In this session, in addition to validating the materiality analysis process conducted so far, the internal financial view was added to the assessment of topics and sub-topics. This assessment was incorporated as an additional variable in the financial materiality scale.

- As in the case of the impacts, all these assessments result in a score (between 0 and 4) for each risk and opportunity, **those with a score higher than 2 are considered as material**.

It is worth mentioning that for the assessment of all these elements a qualitative information text has been added to explain and justify the criteria used for each of them.

Once all impacts, risks and opportunities (IROs) have been assessed, all those scoring above 2 in both impact materiality and financial materiality have been considered material IROs. Furthermore, the sub-topics to which these IROs correspond will also be considered material. Sub-topics where no material IROs are identified will not be considered material and no information will be disclosed in this statement.

The IROs and sub-topics that have exceeded the materiality threshold and are therefore considered material and reported in this sustainability statement are as follows:

| Material areas | Material topics | Material sub-topics | Material IROs | Classification of IROs |
|----------------|-------------------------|---|---|------------------------|
| Environment | Climate change | Adapting to climate change | Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements. | Negative impact |
| | | | Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services. | Negative impact |
| | | | Progressive exclusion from the market of those participants with a higher physical and/or transitional risk. | Positive impact |
| | | | Financing for companies to enable them to transition towards more environmentally sustainable models | Opportunity |
| | | Climate change mitigation | Non-repayment of loans in the commercial portfolio due to the | Risk |
| | | | Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented. | Risk |
| | | | Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to to possible increases in energy costs for cooling or heating homes. | Risk |
| | | | Financing for companies to enable them to transition towards models with a lower environmental impact. | Opportunity |
| Social | Own personnel | Working conditions | Worsening of staff welfare due to inadequate working conditions. | Negative impact |
| | | | Improved staff welfare through optimal working conditions. | Positive impact |
| | | Equal treatment and opportunities for all | That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect. | Negative impact |
| | | | Loss of motivation and productivity in the workforce because they feel conditioned by their gender, origin, race, sexual orientation or any other aspect. | Risk |
| | Consumers and end-users | Incidents related to information destined to consumers or end-users | Unclear explanations provided to customers, concealment of information or sale of unsuitable products. | Positive impact |
| | | | Clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. | Positive impact |
| | | | Customer loyalty by providing clear, precise and transparent explanations of financial products, their conditions and the costs involved. | Opportunity |
| | | | Achievement of a good reputation in society and in the sector for providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. | Opportunity |
| | | | Legal certainty by providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. | Opportunity |
| | | Social inclusion of consumers or end-users | Catering to the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or any other aspect. | Positive impact |
| | | | Customer loyalty and retention by meeting their needs regardless of their gender, origin, race, sexual orientation or any other aspect. | Opportunity |
| | | | Gaining more customers by serving their needs regardless of gender, origin, race, sexual orientation or any other aspect. | Opportunity |

Graphically, the results of the dual materiality analysis are as follows:

| | | Material | | No material | |
|---------------------------------------|--|-------------------------|-------------------------|-------------|--------------------|
| Temas de sostenibilidad | Subtemas de sostenibilidad | Materialidad de impacto | Materialidad financiera | | Doble materialidad |
| | | Impacto | Riesgo | Oportunidad | Resultado |
| Cambio climático | Adaptación al cambio climático | | | | |
| | Mitigación del cambio climático | | | | |
| | Energía | | | | |
| Contaminación | Contaminación del aire | | | | |
| | Contaminación del agua | | | | |
| | Contaminación del suelo | | | | |
| | Contaminación de organismos vivos y recursos alimentarios | | | | |
| | Sustancias preocupantes | | | | |
| | Sustancias extremadamente preocupantes | | | | |
| | Microplásticos | | | | |
| Agua y recursos marinos | Agua | | | | |
| | Recursos marinos | | | | |
| Biodiversidad y ecosistemas | Factores de incidencia directa sobre la pérdida de biodiversidad | | | | |
| | Incidencias sobre el estado de las especies | | | | |
| | Incidencias sobre la extensión y el estado de los ecosistemas | | | | |
| | Incidencias sobre los servicios ecosistémicos y dependencias de estos servicios | | | | |
| Economía circular | Entradas de recursos, incluida la utilización de los recursos | | | | |
| | Salidas de recursos relacionadas con productos y servicios | | | | |
| | Residuos | | | | |
| Personal propio | Condiciones de trabajo | | | | |
| | Igualdad de trato y oportunidades para todos | | | | |
| | Otros derechos laborales | | | | |
| Trabajadores de la cadena de valor | Condiciones de trabajo | | | | |
| | Igualdad de trato y oportunidades para todos | | | | |
| | Otros derechos laborales | | | | |
| Colectivos afectados | Derechos económicos, sociales y culturales de los colectivos | | | | |
| | Derechos civiles y políticos de los colectivos | | | | |
| | Derechos de pueblos indígenas | | | | |
| Consumidores y usuarios finales | Incidencias relacionadas con la información para los consumidores o usuarios finales | | | | |
| | Seguridad personal de los consumidores o usuarios finales | | | | |
| | Inclusión social de los consumidores o usuarios finales | | | | |
| Conducta empresarial | Cultura corporativa, protección de los denunciantes, bienestar animal, compromisos político y actividades de los grupos de presión, gestión de las relaciones con los proveedores, incluidas las prácticas de pago | | | | |
| | Corrupción y soborno | | | | |
| Finanzas sostenible | Entity specific | | | | |
| Ciberseguridad y tratamiento de datos | Entity specific | | | | |

Having clarified the overall process of identifying and assessing IROs in a general way, this process will be described in more detail below for the different sustainability issues.

Climate change (E1)

The process of identifying and assessing the impacts, risks and opportunities related to climate has entailed various phases.

In the first phase, an internal and external analysis was carried out, with the aim of identifying which climate change sub-topics indicated in Directive 2013/34 are relevant in the internal and external context of the LABORAL Kutxa Group. For the internal analysis, 12 internal documents related to sustainability were taken into consideration. While for the external analysis, 5 elements have been taken into account: market trends; regulatory analysis; competitor *benchmark*; experts and analysts; impact on the value chain.

Within the internal analysis, one of the documents taken into consideration is the capital and liquidity self-assessment report (CLAR). This report includes an ESG section which, among other issues, assesses how the physical and transitional risks arising from climate change affect the entity.

With regard to physical risks, within the operational risk, the entity has carried out an analysis to identify and assess how physical risks affect its own properties. The physical risks analysed are: seismic, desertification, river flooding, coastal flooding, volcanic and fire hazards. Information from the Sociedad de Tasación has been used to analyse the different risks by physical location. When assessing the impact on the entity's own buildings, a distinction was made between the central services buildings in Mondragon, on the one hand, and the rest of the buildings on the other. The reason for this distinction is to have considered that an extreme weather event affecting central services would have a much more relevant impact than on the rest of the buildings, mainly bank branches, where the impact on the business would be residual. The results show that central services are not affected by significant physical risks, while 5.1% of the rest of the buildings are affected by some kind of climate risk. In conclusion, it is considered that the physical risks on real estate and LABORAL Kutxa's own operations, i.e. operational risk, are considered to be of low materiality in the short and medium term, while in the long term they could be of medium-low materiality.

In the process of analysing material issues, no impacts, risks or opportunities arising from the Group's direct activity have been identified.

In addition, the CLAR also assesses how physical and transitional risks, including greenhouse gas (GHG) emissions, affect the entity's trade finance portfolio. In this case, the way in which they may influence the solvency of the institution is analysed, concluding that they have a low materiality in the short and medium term, while in the long term they could have a medium-low materiality. It is worth mentioning that different climate scenarios will be considered for this analysis in 2025.

In the second phase, stakeholders have been consulted on their views on various sub-topics listed in Directive 2013/34. On climate change, 2 issues have been consulted, which have been matched with the sub-topics in this way:

- Development of socially and environmentally responsible products and services to drive the transition towards a green and sustainable economy: related to the sub-topic climate change adaptation.

- Reduction of direct environmental impacts: consumption, waste, pollution, carbon footprint and protecting biodiversity: related to the sub-topics climate change mitigation and energy.

In the third phase, taking into account the assessments of the internal and external analysis and the stakeholder consultations, the most relevant sub-topics have been pre-selected. With regard to climate change, the sub-topics climate change mitigation and adaptation have been pre-selected, while the sub-topic energy has been discarded.

In the fourth phase, based on the sub-topics pre-selected in phase 3, the impacts, risks and opportunities (IROs) of each sub-topic have been identified. These have been the IROs of climate change:

| Identified IROs | Impacts | Risks | Opportunities |
|----------------------------|--|--|--|
| Climate change mitigation | <p>Reduction of GHG emissions or environmental damage of the companies to which LABORAL Kutxa has granted financing.</p> <p>Provoking significant GHG emissions or environmental damage by the companies to which LABORAL Kutxa has granted financing.</p> | <p>Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).</p> <p>Higher insurance costs due to higher claims arising from extreme weather events.</p> <p>Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented.</p> <p>Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to possible increases in energy costs for cooling or heating homes.</p> | <p>Financing for companies to enable them to transition towards models with a lower environmental impact.</p> <p>Mortgage financing for homes with high energy certificates or refurbishment of homes with low energy certificates to make them more energy efficient.</p> <p>Use of renewable and self-consumption energy sources for LK.</p> |
| Adapting to climate change | <p>Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services.</p> <p>Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.</p> <p>Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.</p> | <p>Non-repayment of mortgage loans or a decrease in the valuation of the mortgage portfolio due to possible flooding or other physical risks to the dwellings.</p> <p>Non-repayment of the loans of companies to which LABORAL Kutxa has granted financing due to physical damage (floods, desertification, hailstorms...) to their assets or facilities.</p> <p>Viability issues affecting business sectors due to belonging to activity sectors subject to considerable environmental regulations or adaptation to new market standards.</p> <p>Difficulties for the continuity of LABORAL Kutxa's business due to possible physical damage to its facilities or buildings.</p> | <p>Financing for companies to enable them to transition to more environmentally sustainable models.</p> |

In the fifth and final phase, as explained in the disclosure requirement NEIS 2-IRO 1, the detected IROs are assessed, taking into consideration their scope, likelihood, potential correction, economic valuation and stakeholder opinion. Of all the IROs mentioned in the previous point, after their assessment, the following have been considered material:

| Identified IROs | Impacts | Risks | Opportunities |
|----------------------------|--|--|--|
| Climate change mitigation | | <p>Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).</p> <p>Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented.</p> <p>Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to possible increases in energy costs for cooling or heating homes.</p> | Financing for companies to enable them to transition towards models with a lower environmental impact. |
| Adapting to climate change | <p>Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services.</p> <p>Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.</p> <p>Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.</p> | | Financing for companies to enable them to transition to more environmentally sustainable models. |

Pollution (E2)

The process for identifying and assessing the impacts, risks and opportunities related to the pollution sub-topic was based on an internal and external analysis of the LABORAL Kutxa Group (GLK), where all the sub-subtopics that make up the pollution sub-topic were analysed: air pollution; water pollution; soil pollution; contamination of living organisms and food resources; substances of concern; substances of very high concern; microplastics; taking into consideration both their own processes and those of the value chain.

In the internal analysis, 12 internal documents of the GLK related to sustainability were assessed. While the external analysis has taken into consideration 5 components: market trends; regulatory analysis; competitor *benchmark*; experts and analysts; impact on the value chain. As explained above, the process has included stakeholder consultation.

With regard to the impacts, risks and opportunities of the Group's locations, since 2001 LABORAL Kutxa has had ISO 14001 environmental certification, audited annually by AENOR, for its three Central Services buildings in Arrasate. Each year, its environmental factors are identified, recorded and evaluated in order to determine their associated environmental impacts and establish their level of significance from a life-cycle perspective. As a result of the identification, no significant impacts or risks related to pollution are detected.

In addition, a context and stakeholder analysis is conducted annually to understand the organisation and its context, as well as the needs and expectations of stakeholders. As a result of this analysis, the expectations and needs of stakeholders from an environmental stance are determined and a series of actions are taken to respond to the risks and opportunities detected. This is set out in the annual environmental plan, which is approved by the Environment Committee and endorsed by management.

Although the environmental certification exclusively focuses on the three buildings, these are the ones that, due to their configuration and installations, could produce some impact on pollution in any of its potential effects. The remaining locations correspond to the commercial network of branches or service offices and therefore do not present significant impacts, risks or opportunities in their operations.

After the assessment of all these elements, it is concluded that none of the sub-topics of the pollution sub-topic are material for the GLK.

Water and marine resources (E3)

The process for identifying and assessing the impacts, risks and opportunities related to the pollution sub-topic was based on an internal and external analysis of the LABORAL Kutxa Group (GLK), where all the sub-subtopics that make up the pollution sub-topic were analysed: water and marine resources, and taking into consideration both in its own operations and in the value chain.

In the internal analysis, 12 internal documents of the GLK related to sustainability were assessed. While the external analysis has taken into consideration 5 components: market trends; regulatory analysis; competitor *benchmark*; experts and analysts; impact on the value chain.

With regard to the impacts, risks and opportunities of the Group's locations, since 2001 LABORAL Kutxa has had ISO 14001 environmental certification, audited annually by AENOR, for its three Central Services buildings in Arrasate. Each year, its environmental factors are identified, recorded and evaluated in order to determine their associated environmental impacts and establish their level of significance from a life-cycle perspective. As a result of the identification, no significant impacts or risks related to water (including discharges) and marine resources have been detected.

In addition, a context and stakeholder analysis is conducted annually to understand the organisation and its context, as well as the needs and expectations of stakeholders. As a result of this analysis, the expectations and needs of stakeholders from an environmental stance are determined and a series of actions are taken to respond to the risks and opportunities detected. This is set out in the annual environmental plan, which is approved by the Environment Committee and endorsed by management.

Although the environmental certification exclusively focuses on the three buildings, these are the ones that, due to their configuration and installations, could produce some impact on water (not marine resources). The remaining locations correspond to the commercial network of branches or service offices and therefore do not present significant impacts, risks or opportunities in their operations.

As explained in NEIS E1-IRO1 Description of the processes for identifying and assessing climate-related impacts, risks and opportunities, LABORAL Kutxa has carried out an analysis of the physical operational risk arising from its physical locations. This analysis includes river and maritime flood risks. The result of this analysis is that there is no significant risk. Along the same lines, the physical risk of river flooding of the mortgage portfolio has been analysed by its physical location. The conclusion of this second analysis is that even in the case of a stressed scenario, the impact of the materialisation of this risk would not have a material impact for LABORAL Kutxa.

After the assessment of all these elements, it is concluded that none of the sub-topics of the water and marine contamination sub-topic are material for the GLK.

Biodiversity and Ecosystems (E4)

The process for identifying and assessing the impacts, risks and opportunities related to the pollution sub-topic was based on an internal and external analysis of the LABORAL Kutxa Group (GLK), where all the sub-subtopics that make up the pollution sub-topic were analysed: impact factors directly affecting biodiversity loss, impacts on species status, impacts on ecosystem extent and condition, and impacts on ecosystem services and dependencies on these services; taking into consideration both their own processes and those of the value chain.

In the internal analysis, 12 internal documents of the GLK related to sustainability were assessed. While the external analysis has taken into consideration 5 components: market trends; regulatory analysis; competitor *benchmark*; experts and analysts; impact on the value chain.

With regard to the impacts, risks and opportunities of the Group's locations, since 2001 LABORAL Kutxa has had ISO 14001 environmental certification, audited annually by AENOR, for its three Central Services buildings in Arrasate. Each year, its environmental factors are identified, recorded and evaluated in order to determine their associated environmental impacts and establish their level of significance from a life-cycle perspective. As a result of the identification, no significant impacts or risks related to biodiversity and ecosystems are detected.

In addition, a context and stakeholder analysis is conducted annually to understand the organisation and its context, as well as the needs and expectations of stakeholders. As a result of this analysis, the expectations and needs of stakeholders from an environmental stance are determined and a series of actions are taken to respond to the risks and opportunities detected. This is set out in the annual environmental plan, which is approved by the Environment Committee and endorsed by management.

Although the environmental certification exclusively focuses on the three buildings, these are the ones that, due to their configuration and installations, could potentially affect biodiversity. The remaining locations correspond to the commercial network of branches or central service offices and are located in cities and towns, and therefore do not present significant impacts, risks or opportunities in their operations.

After the assessment of all these elements, it is concluded that none of the biodiversity and ecosystems sub-topics are material for the GLK.

Given its location in urban populations and the activity carried out, the GLK does not identify sites located in or near biodiversity-sensitive areas that it is negatively affecting. No significant negative impacts are detected in relation to land degradation, desertification or soil sealing and no measures are taken to preserve or restore biodiversity.

Use of resources and circular economy (E5)

The process of identifying and assessing the impacts, risks and opportunities related to the sub-topic use of resources and circular economy has been based on an internal and external analysis of the LABORAL Kutxa Group (GLK), where all the sub-topics that make up the sub-topic use of resources and circular economy have been analysed: resource inputs, including use of resources; resource outputs related to products and services; waste; taking into consideration both its own processes and those of the value chain.

In the internal analysis, 12 internal documents of the GLK related to sustainability were assessed. While the external analysis has taken into consideration 5 components: market trends; regulatory analysis; competitor *benchmark*; experts and analysts; impact on the value chain.

After the assessment of all these elements, it is concluded that none of the sub-topics of the use of resources and circular economy sub-topic are material for the GLK.

Business conduct (G1)

The process of identifying and assessing the impacts, risks and opportunities related to business conduct has entailed various phases.

In the first phase, an internal and external analysis is carried out, with the aim of identifying which sub-topics related to business conduct are relevant in the internal and external context of the LABORAL Kutxa Group. Specifically, the sub-topics considered under business conduct were corporate culture (including issues such as corruption and bribery, whistleblower protection and animal welfare); political engagement and lobbying; supplier relationship management, including payment practices.

For the internal analysis, 12 internal documents related to sustainability were taken into consideration. While for the external analysis, five components been taken into account: market trends; regulatory analysis; competitor *benchmark*; experts and analysts; impact on the value chain. Following this assessment, it is concluded that the issue of political commitment and lobbying activities is not relevant for the LABORAL Kutxa Group, as this concept is not detected in its internal documents or in the external analysis.

Therefore, for the second phase, both corporate culture and supplier relationship management, including payment practices, are taken into consideration. Stakeholders have been consulted on these issues, in particular:

- Integrity and control measures: fight against corruption, bribery and money laundering.
 - This is linked to corporate culture, namely corruption and bribery.
- Responsible supplier management: prioritise local purchases and monitor their activity (working conditions, occupational risks, environmental management, etc.).
 - This is linked to supplier relationship management, including payment practices.

In the third phase, adding the stakeholder assessments to the internal and external analysis carried out in phase 1, responsible supplier management has been ruled out: prioritise local purchases and monitor their activity (working conditions, occupational risks, environmental management, etc.). Meanwhile, business conduct, specifically corruption and bribery, has been pre-selected as a possible material sub-topic.

In the fourth phase, the impacts, risks and opportunities (IROs) related to corruption and bribery have been identified:

| Identified IROs | Impacts | Risks | Opportunities |
|------------------------|--|--|---|
| Corruption and bribery | <p>Training of staff to avoid any scenarios of corruption or money laundering.</p> <p>Carrying out cases of corruption or money laundering through LABORAL Kutxa channels or products.</p> | <p>Possible sanctions for failure to prevent scenarios of corruption or money laundering.</p> <p>Bad reputation for LABORAL Kutxa because it is perceived as an institution that is not safe from cases of corruption or money laundering.</p> | <p>Promotion of a good reputation for LABORAL Kutxa for being perceived as an entity with ethical values and socially committed to eradicating behaviours such as corruption or money laundering.</p> |

In the fifth and final phase, as explained in the disclosure requirement NEIS 2-IRO 1, the detected IROs are assessed, taking into consideration their scope, likelihood, potential correction, economic valuation and stakeholder opinion. Of all the IROs mentioned in the previous point, after their assessment, the following two impacts been considered material:

- Training of staff to avoid any scenarios of corruption or money laundering.
- Carrying out cases of corruption or money laundering through the LABORAL Kutxa Group's channels or products.

Cybersecurity and data processing (C1)

The process of identifying and assessing the impacts, risks and opportunities related to cybersecurity and data processing involved several phases.

First of all, it is worth mentioning that “cybersecurity and data processing” is not a specific topic that is included in the CSRD. However, taking into account the importance it may have for the financial sector, the LABORAL Kutxa Group has decided to introduce this aspect.

In the first phase, an internal and external analysis is carried out in order to identify whether the issue of cybersecurity and data processing is relevant in the internal and external context of the LABORAL Kutxa Group.

For the internal analysis, 12 internal documents related to sustainability were taken into consideration. While for the external analysis, five components been taken into account: market trends; regulatory analysis; competitor *benchmark*; experts and analysts, impact on the value chain. Following this assessment, it is concluded that the cybersecurity and data processing topic may be relevant for the LABORAL Kutxa Group, and therefore it moves on to the next phase.

In the second phase, stakeholders are consulted on the issue of cybersecurity and data processing. They are specifically consulted about “privacy protection and the security of data and operations”.

In the third phase, taking into account both stakeholder assessments and the internal and external analysis carried out in phase 1, the concept of cybersecurity and data processing has been pre-selected as a possible material topic.

In the fourth phase, the impacts, risks and opportunities (IROs) related to cybersecurity and data processing have been identified:

| Identified IROs | Impacts | Risks | Opportunities |
|-----------------------------------|---|--|--|
| Cybersecurity and data processing | <p>Plundering of customers' personal data or savings due to fraudulent activities, fraud or scams.</p> <p>Training staff to respond appropriately to cyber-attack attempts to protect customer data and deposits.</p> <p>Resilience of the institution to hostile actions by cyber-criminals.</p> | <p>Economic or operational losses for LABORAL KUTXA as a result of attacks or malicious activities.</p> <p>Attacks on own technological infrastructure with operational, service or economic impact.</p> <p>Loss of customers through plundering of their personal data or savings due to cyber-attacks.</p> <p>Possible claims by customers for plundering their personal data or savings due to cyber-attacks.</p> <p>Bad reputation for LABORAL Kutxa because it is perceived as an institution that is fragile in the face of cyber-attacks.</p> <p>Sanctions for inadequate cybersecurity management.</p> | <p>Promotion of LABORAL Kutxa's good reputation as an institution capable of dealing with and controlling any type of cyber-attack.</p> <p>Attraction of new customers by being able to securely shield their information and savings.</p> |

In the fifth and final phase, as explained in the disclosure requirement NEIS 2-IRO 1, the detected IROs are assessed, taking into consideration their scope, likelihood, potential correction, economic valuation and stakeholder opinion. Of all the IROs mentioned in the previous point, after their assessment, the following two impacts been considered material:

- Plundering of customers' personal data or savings due to fraudulent activities, fraud or scams.
- Training staff to respond appropriately to cyber-attack attempts to protect customer data and deposits.
- Resilience of the institution to hostile actions by cyber-criminals.
- Economic or operational losses for LABORAL KUTXA as a result of attacks or malicious activities.
- Attacks on own technological infrastructure with operational, service or economic impact.
- Loss of customers through plundering of their personal data or savings due to cyber-attacks.

[IRO-2] Disclosure requirements in the ESRS covered by sustainability declarations

| Requirement | | Disclosure | Reason | Section |
|-------------|-------|------------|--------|---|
| NEIS2 | BP-1 | YES | | NEIS2 |
| NEIS2 | BP-2 | YES | | NEIS2 |
| NEIS2 | GOV-1 | YES | | NEIS2 |
| NEIS2 | GOV-2 | YES | | NEIS2 |
| NEIS2 | GOV-3 | YES | | NEIS2 |
| NEIS2 | GOV-4 | YES | | NEIS2 |
| NEIS2 | GOV-5 | YES | | NEIS2 |
| NEIS2 | SBM-1 | YES | | NEIS2 |
| NEIS2 | SBM-2 | YES | | NEIS2 |
| NEIS2 | SBM-3 | YES | | NEIS2 |
| NEIS2 | IRO-1 | YES | | NEIS2 |
| NEIS2 | IRO-2 | YES | | NEIS2 |
| NEIS2 | MDR-P | YES | | NEIS2 |
| NEIS2 | MDR-A | YES | | NEIS2 |
| NEIS2 | MDR-M | YES | | NEIS2 |
| NEIS2 | MDR-T | YES | | E1-Climate change S1-Own personnel S4-Consumers and end-users C1-Cybersecurity and data processing |
| E1 | GOV-3 | YES | | E1-Climate change |
| E1 | 1 | YES | | E1-Climate change |
| E1 | SBM-3 | YES | | E1-Climate change |

| Requirement | | Disclosure | Reason | Section |
|-------------|-------|------------|-----------------------------------|--|
| E1 | IRO-1 | YES | | E1-Climate change |
| E1 | 2 | YES | | E1-Climate change |
| E1 | 3 | YES | | E1-Climate change |
| E1 | 4 | YES | | E1-Climate change |
| E1 | 5 | NO | It is not of relative importance. | |
| E1 | 6 | YES | | E1-Climate change |
| E1 | 7 | NO | Does not apply to the GLK. | |
| E1 | 8 | NO | Does not apply to the GLK. | |
| E1 | 9 | NO | Omitted during the first year. | |
| E2 | IRO-1 | YES | | E2-Pollution |
| E2 | 1 | NO | It is not of relative importance. | |
| E2 | 2 | NO | It is not of relative importance. | |
| E2 | 3 | NO | It is not of relative importance. | |
| E2 | 4 | NO | It is not of relative importance. | |
| E2 | 5 | NO | It is not of relative importance. | |
| E2 | 6 | NO | It is not of relative importance. | |
| E3 | IRO-1 | YES | | E3- Water and marine resources |
| E3 | 1 | NO | It is not of relative importance. | |
| E3 | 2 | NO | It is not of relative importance. | |
| E3 | 3 | NO | It is not of relative importance. | |
| E3 | 4 | NO | It is not of relative importance. | |
| E3 | 5 | NO | It is not of relative importance. | |
| E3 | 6 | NO | It is not of relative importance. | |
| E4 | SBM-3 | NO | It is not of relative importance. | |
| E4 | IRO-1 | YES | | E4-Biodiversity and Ecosystems |
| E4 | 1 | NO | It is not of relative importance. | |
| E4 | 2 | NO | It is not of relative importance. | |
| E4 | 3 | NO | It is not of relative importance. | |
| E4 | 4 | NO | It is not of relative importance. | |
| E4 | 5 | NO | It is not of relative importance. | |
| E4 | 6 | NO | It is not of relative importance. | |
| E5 | IRO-1 | YES | | E5-Use of resources and circular economy |
| E5 | 1 | NO | It is not of relative importance. | |
| E5 | 2 | NO | It is not of relative importance. | |
| E5 | 3 | NO | It is not of relative importance. | |
| E5 | 4 | NO | It is not of relative importance. | |
| E5 | 5 | NO | It is not of relative importance. | |
| E5 | 6 | NO | It is not of relative importance. | |
| S1 | SBM-2 | YES | | S1-Own personnel |
| S1 | SBM-3 | YES | | S1-Own personnel |

| Requirement | | Disclosure | Reason | Section |
|-------------|-------|------------|-----------------------------------|---------------------------------|
| S1 | 1 | YES | | S1-Own personnel |
| S1 | 2 | YES | | S1-Own personnel |
| S1 | 3 | YES | | S1-Own personnel |
| S1 | 4 | YES | | S1-Own personnel |
| S1 | 5 | YES | | S1-Own personnel |
| S1 | 6 | YES | | S1-Own personnel |
| S1 | 7 | NO | Omitted during the first year. | |
| S1 | 8 | YES | | S1-Own personnel |
| S1 | 9 | YES | | S1-Own personnel |
| S1 | 10 | YES | | S1-Own personnel |
| S1 | 11 | YES | | S1-Own personnel |
| S1 | 12 | YES | | S1-Own personnel |
| S1 | 13 | YES | | S1-Own personnel |
| S1 | 14 | YES | | S1-Own personnel |
| S1 | 15 | YES | | S1-Own personnel |
| S1 | 16 | YES | | S1-Own personnel |
| S1 | 17 | YES | | S1-Own personnel |
| S2 | SBM-2 | NO | It is not of relative importance. | S2-Employees of the value chain |
| S2 | SBM-3 | NO | It is not of relative importance. | S2-Employees of the value chain |
| S2 | 1 | NO | It is not of relative importance. | |
| S2 | 2 | NO | It is not of relative importance. | |
| S2 | 3 | NO | It is not of relative importance. | |
| S2 | 4 | NO | It is not of relative importance. | |
| S2 | 5 | NO | It is not of relative importance. | |
| S3 | SBM-2 | NO | It is not of relative importance. | |
| S3 | SBM-3 | NO | It is not of relative importance. | S3-Affected communities |
| S3 | 1 | NO | It is not of relative importance. | |
| S3 | 2 | NO | It is not of relative importance. | |
| S3 | 3 | NO | It is not of relative importance. | |
| S3 | 4 | NO | It is not of relative importance. | |
| S3 | 5 | NO | It is not of relative importance. | |
| S4 | SBM-2 | YES | | S4-Consumers and end-users |
| S4 | SBM-3 | YES | | S4-Consumers and end-users |
| S4 | 1 | YES | | S4-Consumers and end-users |
| S4 | 2 | YES | | S4-Consumers and end-users |
| S4 | 3 | YES | | S4-Consumers and end-users |
| S4 | 4 | YES | | S4-Consumers and end-users |
| S4 | 5 | YES | | S4-Consumers and end-users |
| G1 | GOV-1 | YES | | G1-Business conduct |
| G1 | IRO-1 | YES | | G1-Business conduct |

| Requirement | | Disclosure | Reason | Section |
|-------------|--|------------|-----------------------------------|--------------------------------------|
| G1 | 1 | YES | | G1-Business conduct |
| G1 | 2 | NO | It is not of relative importance. | |
| G1 | 3 | YES | | G1-Business conduct |
| G1 | 4 | YES | | G1-Business conduct |
| G1 | 5 | NO | It is not of relative importance. | G1-Business conduct |
| G1 | 6 | NO | It is not of relative importance. | |
| G1 | Information relating to the fight against corruption and bribery | YES | | G1-Business conduct |
| C1 | SBM-2 | YES | | C1-Cybersecurity and data processing |
| C1 | IRO-1 | YES | | C1-Cybersecurity and data processing |
| C1 | SBM-3 | YES | | C1-Cybersecurity and data processing |
| C1 | 1 | YES | | C1-Cybersecurity and data processing |
| C1 | 2 | YES | | C1-Cybersecurity and data processing |
| C1 | 3 | YES | | C1-Cybersecurity and data processing |
| C1 | 4 | YES | | C1-Cybersecurity and data processing |

[MDR-P] Policies adopted to manage material sustainability issues

The different policies adopted to manage sustainability issues will be explained in the various sections of this policy. It is worth mentioning that, in some sections, in addition to policies, regulations, rules or codes are also mentioned. However, in this section we will compile all of them in order to have an overview and indicate in which section each of them is located.

- Policies:
 - Sustainability policy of the LABORAL Kutxa Group. (Section E1-2)
 - ESG Investment, Financing and Underwriting Policy. (E1-2)
 - Recruitment policy. (S1-1)
 - Recruitment, selection and internal mobility policy. (S1-1)
 - Remuneration-assessment policies. (S1-1)
 - Policy and procedure for training and accreditation of persons who grant, design, report on or market credit agreements for residential real estate with customers or potential customers. (S4-1)

- Policy and procedure for the training and assessment of persons who inform or advise customers or potential customers. (S4-1)
- ICT risk management policy. (C1-1)
- ICT-related incident management policy. (C1-1)
- Comprehensive Security Policy (CNS). (C1-1)
- Data Governance Policy. (C1-1)
- Regulations/ codes:
 - Internal rules of procedure. (S1-1)
 - Code of Ethics and business conduct. (G1-1)
- Regulations:
 - Article 3 of RD 565/2017/EU, conditions applicable to the provision of information and articles 44 to 52 related to customer information. (S4-1)
 - Article 200 of Law 6/2023, general duty of information to customers to which institutions are subject. (S4-1)
 - Articles 143 and 144 of RD 813/2023, on the general duty of information and electronic format. (S4-1)
 - Article 4.9 of Royal Decree 1082/2012, of 13 June, on CIIIs. (S4-1)
 - Regulation (EU) 2019/2088, on sustainability disclosures in the financial services sector. (S4-1)
 - Law 35/2003, of 4 November, on Collective Investment Institutions and Royal Decree 816/2023, of 8 November, implementing it. (S4-1)
 - Rule 7 of Circular 4/2008, on quarterly, half-yearly and annual reporting of CIIIs. (S4-1)
 - CNMV Communication of 23 January 2015 on transparency measures in the marketing of CIIIs. (S4-1)
 - Law 5/2021, of 12 April, on capital companies. (S4-1)
 - Circular 7/2011, of 12 December, on tariff prospectus and content of standard contracts. (S4-1)
 - Articles 5, 6 and 9 of Order EHA/1665/2010, 11 June, on the legal regime for investment services firms with regard to tariffs and standard contracts. - Communication from the CNMV on the adaptation of standard contracts to the provisions of Royal Decree 217/2008, of 15 February. (S4-1)

- Communication from the CNMV on the adaptation of Standard Contracts to the provisions of Royal Decree 217/2008, of 15 February. (S4-1)
- Order EHA/2899/2011, of 28 October, on transparency and customer protection in banking services. (S4-1)
- Royal Decree-Law 19/2017, of 24 November, on basic payment accounts, transfer of payment accounts and comparability of fees. (Official State Gazette of 25 November). (S4-1)
- Accessibility Directive 2019/882, with the aim of making products and services provided in the EU more accessible to people with disabilities. (S4-1)
- Law 11/2023, on the transposition of European Union Directives on accessibility. (S4-1)
- Royal Decree-Law 19/2017, of 24 November, on basic payment accounts, transfer of payment accounts and comparability of fees. (Official State Gazette of 25 November). (S4-1)
- Royal Decree-Law 1/2017, of 20 January, on urgent measures for the protection of consumers with regard to floor clauses. (S4-1)
- Order EHA/2899/2011, of 28 October, of the Ministry of Economy and Finance (B.O.E. of 29 October), on transparency and customer protection in banking services. (S4-1)
- Bank of Spain Circular 5/2012, of 27 June (B.O.E. of 6 July), to credit institutions and payment service providers, on transparency of banking services and responsibility in the granting of loans. (S4-1)

[MDR-A] Actions and resources in relation to material sustainability issues

As in the MDR-P section, the actions and measures are also described in the different sections of this report. This section will therefore mention all of them and indicate in which areas they can be found.

- Introduction of sustainability clauses in commercial loans where the economic conditions may vary according to the performance of the counterparties on sustainability, environmental or carbon footprint reduction issues. (Section E1-3)
- Launch of the new pricing of mortgages in which the most energy efficient homes are given a better spread. (E1-3)
- Establishment of limits for financing companies with climate and environmental risk. (E1-3)

- Establishment of limits on mortgage financing for homes with less energy efficient ratings. (E1-3)
- Review and adaptation of people policies to make them Purpose-centred systems. (S1-4)
- Development of cooperative leadership to develop healthy and quality working environments. (S1-4)
- Actions within the Zainduz programme (S1-4)
- Designing a corporate volunteering model (S1-4)
- Psychosocial risk assessment (S1-5)
- Launch of the corporate culture diagnostic survey (S1-5)
- Percentage of TCA (employees) less than 20% in Laboral Kutxa (S1-5)
- Presentation of the following information to customers through the Information Prospectus on Caja Laboral Popular Coop. de Crédito and its Investment Services in a transparent manner and prior to any contracting. (S4-4)
- Make the following information available to the customer: (S4-4)
 - Access to tariff prospectuses.
 - Provision of legal pre-contractual information on the products that are the subject of a recommendation and/or contract.
 - Provision of post-contractual product information: costs and expenses, statements of transactions and positions, tax information, annual performance report, etc.
 - Provision of regular information on investment and market developments.
 - Access to positions, documents, contracts, correspondence, etc. via online banking at any time and free of charge.
- Review of product and service contracts by the Legal Department. (S4-4)
- Annual checks by the Regulatory Compliance department to verify whether processes are being carried out in accordance with the regulations. In the event of incidents, corrective measures are requested. Recommendations are also issued in these controls. (S4-4)
- Monitoring by the Product Committee for the correct marketing of products (that they are marketed to the target audience, assessment of possible reputational, cyber, operational risks...). (S4-4)

- MiFID training required for the commercial network (30 hours per year) for the correct performance of their functions. (S4-4)
- Review by Self-control of all commercial communications for truthful, legal, honest and fair advertising. (S4-4)
- Comprehensive accessibility plan. (S4-4)
- Availability of a Basic Payment Account. (S4-4)
- Inform all customers who have taken out a personal loan (regardless of the channel used, whether physical or digital) that they have 15 days to withdraw from the contracted financing, without penalty. (S4-4)
- In mortgage lending, deliver price offers to customers always in the format called "European Standardised Information Sheet - ESIS". (S4-4)
- Updating and extending the cybersecurity operating model to include stakeholders across the organisation, improving the integration of cybersecurity into technology products, services and processes. (C1-3)
- Adoption of a culture of cybersecurity that cuts across the entire organisation, in which everyone plays a key role in protecting information and the assets that contain it. (C1-3)
- Development of specific training actions aimed at all people in the organisation to ensure the provision of skills for the early detection of and, where appropriate, response to attempted cyber-attacks or identity theft. (C1-3)
- Implementation of technical security projects that not only provide a solution to the increasingly strict regulatory requirements, but also serve to position LABORAL Kutxa as a benchmark for security and trust in its sector. (C1-3)
- Integration of cybersecurity as a strategic pillar in all the Entity's projects, guaranteeing data protection, operational continuity and resilience against digital threats. (C1-3)
- Establishment of a direct and permanent line of collaboration with authorities and concerned third parties for the prompt management of cyber-incidents, under the premise of proactivity and support in the adoption of measures to facilitate their resolution. (C1-3)
- Evolution of the Business Continuity system and processes by reviewing and improving Specific Security Plans, drawing on lessons learned from cyber-exercises and controlled continuity tests. (C1-3)

[MDR- M] Parameters in relation to material sustainability issues

As specified in the MDR-P and MDR-A sections, the parameters, goals and objectives are also described in the different sections of this report. This section will therefore mention all of them and indicate in which areas they can be found.

- Reduction of own or operational carbon footprint by 5% per year (base year 2023). (E1-4)
- Reduction of the carbon footprint financed and invested (E1-4).
- Establishment of a limit of 12% of total lending to companies with climate/environmental risk. (E1-4)
- Establishment of a 35% limit for financing mortgages for homes with less efficient energy ratings as a percentage of the total mortgage investment. (E1-4)
- Psychosocial risk assessment for all own staff. (S1-5)
- Carrying out a diagnosis of the corporate culture. (S1-5)
- Percentage of TCA (employees) less than 20% in Laboral Kutxa. (S1-5)
- Training of all staff marketing investment and mortgage products. (S4-5)
- Management training for people with disabilities (S4-5)
- Update of the comprehensive accessibility plan. (S4-5)
- Ensure the confidentiality, integrity and availability of financial information and personal data of customers. (C1-4)
- Ensure operational resilience against cyber-attacks or service disruptions. (C1-4)
- Maintain a high level of compliance with financial sector rules and regulations. (C1-4)
- Securing electronic transactions and payment systems (security of transactions). (C1-4)
- Establish capabilities for rapid detection and response to security incidents (through the use of new AI-based technologies). (C1-4)
- Promote a transversal corporate culture oriented towards cybersecurity and protection of sensitive data (training of customers and employees). (C1-4)
- Assess and manage security in the supply chain and ICT service providers. (C1-4)

- Integrating new innovative technologies in a safe way. (C1-4)
- Promote customer trust and brand reputation through clear and transparent actions. (C1-4)

MDR-T: Monitoring the effectiveness of policies and actions through targets

This requirement will be addressed in different sections of this report.

ENVIRONMENTAL INFORMATION

NEIS E1-Climate change

[GOV-3] Integrating sustainability into incentive schemes

This information is described in section NEIS2-GOV3.

[E1-1] Transition plan to mitigate climate change

At the end of 2024, the GLK has no transition plan, nor is one planned for the financial year 2025. The bank has made efforts to make its business model compatible with the transition to a sustainable economy and climate change mitigation. In 2001, it became the first financial institution to obtain an environmental certification: ISO 14001. The carbon footprint has also been calculated for more than 10 years. In recent years, emission reduction targets have been set which, as indicated in section E1-GOV3, are included in the variable remuneration of all employees.

When calculating the CO2 emissions of the LABORAL Kutxa Group, given the financial and insurance activity carried out, two aspects can be differentiated:

- Own or operational carbon footprint, resulting from the Group's own operations.
- The financed and invested carbon footprint, resulting from the emissions generated by customers to whom loans are granted or financial products such as bonds or shares are purchased.

In the second half of 2022, the bank participated in a sectoral project with other financial institutions to design a tool for calculating CO2 emissions. This project covered both operational and investment/financing aspects. The tool is based on the methodologies of the *Science Based Targets* (SBT), the *Net Zero Banking Alliance*, *Pacta* and *PCAF*.

OWN/OPERATIONAL CARBON FOOTPRINT

During 2023 and 2024 there has been a carbon footprint reduction target of 5% per year. This objective is aligned with the objectives of the Paris Agreement.

In order to make progress in its reduction, measures have been established such as the purchase of all energy consumed from renewable sources, the mobility plan, the reduction of the inter-office mail or the renovation of facilities and work centres.

FINANCED AND INVESTED CARBON FOOTPRINT

As a result of a new sectoral project derived from the previous one, decarbonisation pathways have been designed in late 2024 for the invested and financed portfolio. To this end, the sectors with the greatest impact on the environment have been identified and decarbonisation pathways have been established for each of them, with 2023 serving as the base year. Both the identification of the sectors and the decarbonisation pathways have been carried out taking into consideration international organisations such as the International Energy Agency (IEA), taking as a reference the Paris Agreement's scenario of a 2°C temperature increase above pre-industrial levels.

The sectors to be decarbonised, their starting points and how much they should reduce their emissions according to their pathways by both 2030 and 2050 are specified below:

| Sectors to decarbonise | tCO2/unit (2023) | 2030 | 2050 |
|------------------------|---------------------------|---------|---------|
| Residential mortgages | 24.6 kgCO2/m ² | -19.3 % | -69.6 % |
| Commercial mortgages | 98.5 kgCO2/m ² | -29.4 % | -29.4 % |
| Energy | 640 tCO2/€M | -41.3 % | -100 % |
| Steel | 0.96 tCO2/t-steel | -12.9 % | -35.6 % |
| Aviation | 1.47 tCO2/RTK | -44.4 % | -80.7 % |
| Fossil fuels | 108 tCO2/€M | -16.4 % | -62.4 % |

These sectors as a whole, as well as the most significant partners within each sector, will be monitored on an annual basis to ensure that they are complying with the established pathways. In case of deviations from the targets, corrective measures will be considered.

In addition, on the key actions carried out, mention should be made of the *engagement* with some of the most significant counterparties, the incorporation of the energy rating to the *pricing* of mortgages and loans linked to sustainability indicators, where the interest rate can vary depending on the evolution of the counterparty's CO2 emissions.

It is worth mentioning that these pathways do not correspond to external commitments or certificates that the entity has taken, but only internal guidance for monitoring purposes.

This decarbonisation diagnosis of the financed and invested portfolio is expected to be approved by the Sustainability Committee and the Governing Board in early 2025. Following discussion, the possibility of finalising and approving a transition plan will be assessed.

No significant locked-in GHG emissions from the Group's key assets and products have been detected.

[SBM-3] Material impacts, risks and opportunities and their interaction with the strategy and business model

The LABORAL Kutxa Group, in its dual materiality process, has identified three material risks related to climate change, specifically with the sub-subtopic of climate change mitigation. All these risks can be considered transitional:

- Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).
- Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented.
- Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to possible increases in energy costs for cooling or heating homes.

These risks have been taken into account and assessed as part of the resilience analysis in the annual capital and liquidity self-assessment report (CLAR). The 2024 CLAR assesses how environmental, social and governance (ESG) risks affect the entity's traditional risks, both in the short (less than 3 years), medium (between 3 and 5 years) and long (more than 5 years) term.

On these three material transitional risks, the CLAR has analysed the potential impact on credit risk of. In other words, to what extent they may have an impact on the possibility of default on funding granted by counterparties and, consequently, on the solvency of the institution. The conclusion drawn from the analysis is that its materiality is considered low in the short and medium term, while it rises to medium-low in the long term.

By 2025 this analysis will be completed with the use of two climate scenarios from the Network for Greening the Financial System (NGFS): *delayed transition (disorderly)* and *net zero 2050 (orderly)*. No climate scenarios were used in 2024.

Lastly, in the Capital and Liquidity Self-Assessment Report (CLAR) carried out in 2024, following the recommendations of the ECB through its *Good practices for climate-related and environmental risk management*¹, published in November 2022, Laboral Kutxa analyses ESG risks not as an isolated risk, but as a series of events that end up having an impact on the entity's traditional risks, i.e. it acts as a *driver of prudential risks*. In this regard, Laboral Kutxa has developed both its materiality analysis and the configuration of its idiosyncratic scenarios, seeking to integrate these risks into prudential risks, observing different transmission channels.

¹<https://www.bankingsupervision.europa.eu/ecb/pub/pdf/ssm.thematicreviewcercompendiumgoodpractices112022~b474fb8ed0.en.pdf>

As a summary of the exercises analysed throughout the CLAR, a summary table is presented with the conclusions of the analyses carried out for each risk and in each time frame analysed.

| | Short term | Medium term | Long term |
|-----------------------------|------------|-------------|------------|
| Credit risk | Low | Low | Medium-low |
| Market risk | Null | Null | Null |
| Sovereign risk | Null | Null | Null |
| Reputational risk | Low | Low | Medium-low |
| Operational risk | Low | Low | Medium-low |
| Business and strategic risk | Null | Low | Low |
| Structural risks | | | |
| Liquidity risk | Null | Low | Low |
| Interest rate risk | Null | Null | Null |

In the 2023 financial year, the Sustainability Committee established and set a target to reduce the annual carbon footprint by 5% per year over the previous year in order to achieve zero emissions by 2050 in line with the Paris Agreement, this target is scheduled to be reassessed during the 2025 financial year.

With regard to the principle of precaution, as explained above, LABORAL Kutxa has an environmental management system in which environmental risks and opportunities are taken into account and analysed. Within this analysis, no products or technologies have been detected that are being implemented and are suspected of posing a risk to public health or to the environment.

[IRO-1] Description of the processes for identifying and assessing climate-related impacts, risks and opportunities

This information is described in section NEIS2-IRO1.

[E1-2] Policies related to climate change mitigation and adaptation

- SUSTAINABILITY POLICY OF THE LABORAL KUTXA GROUP.
 - Objective: to define and establish the LABORAL Kutxa Group's basic principles of action in the area of sustainability. The Sustainability Committee is responsible for compliance. Specifically, its objectives are as follows:
 - Emphasise the Group's commitment to collaboration and its involvement with society and its stakeholders in the transition towards a sustainable economic model.
 - Establish the principles that will govern the sustainability strategy with a long-term vision that aims both to maximise value creation for stakeholders and to effectively manage environmental, social and governance risks and opportunities.

- Affected sub-subtopics:
 - Adapting to climate change.
 - Climate change mitigation.
- Affected IROs:
 - Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.
 - Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services.
 - Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.
 - Financing for companies to enable them to transition to more environmentally sustainable models.
 - Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).
 - Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented.
 - Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to possible increases in energy costs for cooling or heating homes.
 - Financing for companies to enable them to transition towards models with a lower environmental impact.
- ESG INVESTMENT, FINANCING AND UNDERWRITING POLICY.
 - El Sustainability Committee is responsible for compliance. Objective: to take the necessary actions for the LABORAL Kutxa Group to achieve its ESG objectives in the different areas; in particular, this is specified shaped into the following goals:
 - Align all the Group's entities and business units with the sustainability strategy.
 - Guide or accompany different stakeholders through dialogue and engagement towards a sustainable transition.

- Act as a first protective barrier, excluding certain sectors or activities (as they are contrary to the cooperative's values and ESG objectives), and defining others as sensitive and requiring special monitoring (as they may be contrary to the ESG objectives).
- Establish ESG principles and criteria for financing, underwriting and investing at Group level for more sustainable products and relationships.
- Define the principles, processes and governance framework necessary to achieve the above objectives.
- Affected sub-topics:
 - Adapting to climate change.
 - Climate change mitigation.
- Affected IROs:
 - Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services.
 - Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.
 - Financing for companies to enable them to transition to more environmentally sustainable models.
 - Financing for companies to enable them to transition towards models with a lower environmental impact.

[E1-3] Actions and resources in relation to climate change policies

The main actions carried out in relation to climate change policies in the last two years are:

- Introduction of sustainability clauses in commercial loans where the economic conditions may vary according to the performance of the counterparties on sustainability, environmental or carbon footprint reduction issues.
 - Affected sub-subtopics:
 - Climate change mitigation.
 - Adaptation to climate change.
 - Affected IROs:
 - Financing for companies to enable them to transition to more environmentally sustainable models.

- Financing for companies to enable them to transition towards models with a lower environmental impact.
 - Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services.
- Launch of the new *pricing* of mortgages in which the most energy efficient homes are given a better spread.
 - Affected sub-subtopics:
 - Climate change mitigation.
 - Affected IROs:
 - Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented.
 - Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to possible increases in energy costs for cooling or heating homes.
- Establishment of limits for financing companies with climate and environmental risk.
 - Affected sub-subtopics:
 - Climate change mitigation.
 - Affected IROs
 - Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).
 - Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.
 - Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.
- Establishment of limits on mortgage financing for homes with less energy efficient ratings.
 - Affected sub-subtopics:
 - Climate change mitigation.

- Affected IROs

- Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).
- Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.
- Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.

[E1-4] Targets related to climate change mitigation and adaptation

As indicated in section E1-1, the Entity has been working on climate-related targets. With the reduction of the operational or own carbon footprint there is an annual target, while for the invested and financed carbon footprint the calculation and establishment is progressing.

- Reduction of own or operational carbon footprint by 5% per year (base year 2023).

| Emissions (Tn CO2 eq) | 2023 | 2024 | 2025 | 2030 | 2035 | 2040 | 2045 | 2050 |
|-------------------------------------|---------|-----------------------|-------|-------|-------|------|------|------|
| Objective | 3,411.1 | 3,066.8 | 2,913 | 2,217 | 1,365 | 511 | 0 | 0 |
| Actual emissions (Scope 1, 2 and 3) | 3,228.2 | 3,531.15 ¹ | - | - | - | - | - | - |

- (1) In 2024, the target of a 5% reduction in operational CO₂ emissions has not been achieved, mainly due to increased mobility of the workforce. At the time of drafting this report, corrective measures are being analysed and assessed in order to meet next year's target.

- Reduction of the financed and invested carbon footprint (also explained in E1-6).

| Sectors to decarbonise | tCO2/unit (2023) | Goal 2030 | Goal 2050 |
|------------------------|---------------------------|-----------|-----------|
| Residential mortgages | 24.6 kgCO2/m ² | -19.3 % | -69.6 % |
| Commercial mortgages | 98.5 kgCO2/m ² | -29.4 % | -29.4 % |
| Energy | 640 tCO2/€M | -41.3 % | -100 % |
| Steel | 0.96 tCO2/t-steel | -12.9 % | -35.6 % |
| Aviation | 1.47 tCO2/RTK | -44.4 % | -80.7 % |
| Fossil fuels | 108 tCO2/€M | -16.4 % | -62.4 % |

- Related sub-topics:

- Climate change mitigation.
- Adapting to climate change.

- Related IROs:
 - Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.
 - Contribution towards a more sustainable economy supporting those sectors/companies that generate sustainable products and services.
 - Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.
 - Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).
 - Lower valuation of the mortgage portfolio due to inefficient housing that loses value in the market and needs to be refurbished in order to be sold or rented.
 - Increased difficulties for customers to repay mortgage loans on homes with poor energy ratings, due to possible increases in energy costs for cooling or heating homes.
 - Financing for companies to enable them to transition to more environmentally sustainable models.
 - Financing for companies to enable them to transition towards models with a lower environmental impact.
- Establishment of a limit of 12% of total lending to companies with climate and risk.
 - Affected sub-subtopics:
 - Climate change mitigation.
 - Affected IROs
 - Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).
 - Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.
 - Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.

- Establishment of a 35% limit for financing mortgages for homes with less efficient energy ratings as a percentage of the total mortgage investment.
 - Affected sub-subtopics:
 - Climate change mitigation.
 - Affected IROs
 - Non-repayment of loans in the commercial portfolio due to the difficulties faced by the companies to which loans have been granted in adapting to transitional climate risks (laws, technologies, customer preferences, etc.).
 - Progressive exclusion from the market of those participants with a higher physical and/or transitional risk.
 - Adaptation problems of some companies, especially employment-generating SMEs, to the new environmental requirements.

[E1-5] Consumption and energy mix

The Entity does not disclose information on this sub-subtopic because it is not material, as indicated in disclosure requirement E1-IRO1.

In compliance with Law 11/2018, energy consumption is published.

Energy consumption:

| Energy (Gj) (all LABORAL Kutxa and staff) | 2024 | 2023 |
|--|---------------|---------------|
| Electricity | 39,457 | 38,238 |
| Diesel | 11 | 14.4 |
| Propane | 0.39 | 0.39 |
| Energy consumption A | 39,468 | 38,252 |
| Energy consumption/pers. | 16.53 | 17.14 |
| External energy consumption B (displacement petrol) | 21,909 | 20,738 |
| Energy intensity* | 25.7 | 26.43 |

* Total energy consumption (including internal A and external B) divided by total number of employees

Significant efforts have been made in recent years to improve energy efficiency:

- The introduction of a geothermal installation to air-condition the Central Services.
- The construction of a biomass plant to meet the heating needs of the biomass. Both systems have made it possible to eliminate climate control using fossil fuels.
- Renovation of insulation (low emissivity glass), installations (LED) and machinery to increase the efficiency of air conditioning and lighting, both in the Central Services buildings and in the network of branches.

[E1-6] Gross GHG emissions from Scopes 1, 2, 3 and Total

FINANCED AND INVESTED CARBON FOOTPRINT (category 15 Investments)

In addition to the operational carbon footprint, category 15 of scope 3, which refers to investments, is also disclosed. Due to its weight in financial institutions, this data is disclosed separately.

Within the investment category, the financed and invested carbon footprint of the entity will be taken into account, which correspond to the GHG emissions of the downstream stages of the value chain. It is divided into six different sections: corporate loans, government loans, mortgage loans, corporate bonds, equities and sovereign debt.

In addition to the information on tCO₂ and the amount considered for each item, the tCO₂/€M for each item will also be disclosed.

It is worth mentioning that some of the items do not take into account 100% of the scope. As in the case of loans to public administrations, those with an exposure of less than €100,000 are excluded as they lack materiality.

In addition, for those counterparties for which the carbon footprint is unknown, *proxies* are used to calculate it from their CNAEs.

| FINANCED AND INVESTED CARBON FOOTPRINT FOR 2024 | tCO ₂ | € | tCO ₂ /M € |
|---|------------------|----------------|-----------------------|
| Corporate loans | 1,193,204 | 3,054,909,766 | 392 |
| Loans to Public Administrations | 205,672 | 856,255,385 | 240 |
| Mortgage loans | 103,388 | 9,872,033,738 | 10 |
| Equities | 16,797 | 30,077,608 | 558 |
| Private fixed-income | 1,156 | 128,250,000 | 9 |
| Government bonds | 822,305 | 5,879,184,235 | 140 |
| TOTAL | 2,342,522 | 19,820,710,732 | 118 |

The calculation of the financed and invested carbon footprint (scope 3, category 15) for the year 2023 is also shown below:

| INVESTED AND FINANCED CARBON FOOTPRINT FOR 2023 | tCO ₂ | € | tCO ₂ /€M |
|---|------------------|----------------|----------------------|
| Corporate loans | 367,170 | 937,007,513 | 392 |
| Loans to Public Administrations | 231,664 | 940,294,230 | 246 |
| Mortgage loans | 105,305 | 9,901,273,412 | 11 |
| Equities | 43,409 | 320,462,691 | 135 |
| Private fixed-income | 10,559 | 99,766,542 | 106 |
| Government bonds | 955,816 | 6,886,845,050 | 139 |
| TOTAL | 1,713,923 | 19,085,649,437 | 90 |

As can be seen, the carbon footprint has increased, both in terms of tCO₂ and tCO₂/€M. However, it is worth mentioning that in 2024 a higher amount has been taken into account, with an additional € 735,061,295, with the item that has increased the most in this respect being related to corporate loans. This is because the data available from counterparties has increased, and comparisons cannot be entirely homogeneous.

Regarding the methodology applied for the financed and invested emissions, the PCAF (Partnership for Carbon Accounting Financials) methodology has been used. Specifically, for the calculation of financed emissions, the process has been approached from the perspective of understanding the composition of the different portfolios considered relevant in terms of financing and investment, considering the adaptation to the different products offered, as well as the need to assess the related issues from a sectoral perspective. For the latter, a system of equivalences between sectors and CNAE codes has been developed, as this system is considered to be the most widespread when classifying the economic activities financed. A limitation has been identified in linking ISIN codes and sectors, so the methodology assumes that most institutions will have undertaken or will undertake a process of mapping this system to CNAE as an internal taxonomy of their investments.

| COMPANY | | | YEAR | YEAR |
|--------------------------|------|--|---------------------|----------------------|
| LABORAL Kutxa | | | 2024 | 2023 |
| Summary of GHG emissions | | | | |
| Scope | ID | Type of activity | t CO ₂ e | t CO ₂ e2 |
| DIRECT EMISSIONS | A1.1 | Stationary sources | 30.32 | 30.75 |
| Scope 1 | A1.2 | Mobile sources | | |
| | A1.3 | Fugitive emissions | 141.98 | 86.38 |
| | A1 | Scope 1 - Total | 172.30 | 117.13 |
| INDIRECT EMISSIONS | A2.1 | Electricity consumption | | |
| | A2 | Scope 2 - Total | | |
| INDIRECT EMISSIONS | A3.1 | Purchased goods and services | 395.62 | 402.37 |
| Scope 3 | A3.4 | Upstream transportation and distribution | 61.74 | 84.25 |
| | A3.5 | Waste generated in the activity | 0.67 | 0.77 |
| | A3.6 | Business travel | 937.16 | 888.64 |
| | A3.7 | Employee commuting | 1,963.67 | 1,735.04 |
| | A3 | Scope 3 - Total | 3,358.86 | 3,111.07 |
| | | Total emissions | 3,531.16 | 3,228.20 |

With regard to the methodology used for the calculation of the operational footprint, as mentioned above, a project to develop a methodology and a calculation tool suitable for the characteristics of the financial sector was launched at the end of 2022. For the calculation of the so-called operational carbon footprint, the following reference frameworks were used:

| | Reference framework |
|--------------------------------|---|
| Scope 1 | <i>Greenhouse Gas Protocol Corporate Standard</i> |
| Scope 2 | <i>Scope 2 Guidance</i> |
| Scope 3 (excluding investment) | <i>The Corporate Value Chain (Scope 3) Accounting and Reporting Standard and Technical Guidance for Calculating Scope 3 Emissions</i> |

The operational carbon footprint of an entity is based on the total GHG emitted by direct or indirect effect as a result of its operations.

Organisational boundaries

Organisational boundaries are defined as the facilities, organisations and companies that are included in the calculation due to their control. Financial institutions may be composed of more than one facility, so the organisational boundaries whose emissions will be accounted for in the GHG inventory must be clearly defined. In the present case, all the GLK facilities and persons are concerned.

Operational boundaries

After setting organisational boundaries, these should be set by identifying the types of GHG emission sources from one's own operations, and which ones will be included in the calculation. These emissions shall be classified as direct and indirect emissions and for each of the three scopes.

Choice of calculation period and base year

Financial institutions must define for which year their emissions will be calculated and reported. In addition, entities must choose and report a base year for which reliable emissions information is available. The objective is to establish a comparison with oneself by analysing the evolution of emissions over a time series. In the case of the GLK, the calculation period is the calendar year and 2022 has been chosen as the base year.

Collecting activity data and searching for emission factors

In order to calculate the carbon footprint, it is necessary to know two parameters: the activity data and the emission factor.

| Activity Data (AD) | Emission Factor (EF) |
|--|--|
| The Activity Data (hereafter, AD) is a quantitative measure of a GHG-generating activity. For example: amount of energy consumed (kWh), km travelled, raw material consumption, etc. | The Emission Factor (hereinafter, EF) is the amount of GHG emitted per unit of “activity data”. These data vary depending on the activity concerned. Indicates how much a process or product pollutes per unit consumed. |

The mathematical formula used to calculate an organisation’s GHG emissions consists of a multiplication involving both AD and EF.

Globally, emissions results for all GHG emissions have been standardised in a unit called CO₂eq. This unit does not only quantify CO₂ emissions, but represents the emissions of all GHGs emitted.

Generally, for emissions where there is a chemical transformation process (Scope 1 stationary and mobile combustion and Scope 2 emissions), EFs in units of CO₂eq/pc are used. The calculation is therefore as follows:

Formula

Huella de Carbono = Dato de la Actividad x Factor de Emisiorn

When the EF in units of CO₂eq/pc is not available, it is necessary to use the EF in units of GHG quantity/unit. To obtain the emissions in units of CO₂eq, it is necessary to multiply the result by the Global Warming Potential (hereafter, GWP). This parameter indicates the contribution of each GHG to global warming by reference to CO₂, whose GWP is equal to 1.

The resulting formula is as follows:

Emisiones GEI(tn CO₂eq) = DA(ud) x FE(tn GEI/ud) x PCG(tn CO₂eq/tn GE)

For cases where there is no chemical transformation (fugitive emissions of refrigerant gases), the calculation methodology is to obtain the emission data (amount of refrigerant gas leaked) and then multiply it by the GWP for that refrigerant gas. The formula is as follows:

Emisiones GEI(kg CO₂eq) = DE(kg GEI) x PCG(kg CO₂eq/kg GEI)

Once the unit calculation of emissions is available for each source in units of tonnes CO₂eq, all emissions in the same category (direct emissions, indirect emissions from energy and other indirect emissions) shall be summed up.

In order to ensure the success of non-financial verification and/or audit processes, the concept of uncertainty should be defined. This refers to the inherent error in the calculations of the parameters considered for the calculation of the carbon footprint. For its calculation, a normal statistical distribution of the variables is assumed.

Scope 1

Scope 1 covers emissions of gases that are due to the combustion of fuels in machines (boilers, furnaces, etc.); combustion of fuels from the organisation's vehicle fleet; or fugitive emissions of refrigerant gases in air conditioning equipment.

Financial institutions base their main activity on branches, so their direct emissions are very limited. Direct emissions are mainly those controlled by the entity such as refrigeration equipment or rental vehicles.

Scope 1 emissions shall be calculated on the basis of purchased quantities of commercial fuels (natural gas, diesel, petrol, etc.) using the reference emission factors. The current methodology considers those published by MITECO in order to address the relevant calculations.

As a first step, the organisation should carry out the exercise of identifying its direct Scope 1 emission sources and classify them as follows: stationary sources, mobile sources or fugitive emissions.

Stationary sources

Stationary sources are characterised by the combustion of fuels at a fixed point as part of an installation (e.g. boilers), without changing location and being stationary. Gaseous emissions may be due to the combustion of fuel in boilers, furnaces, ovens, cookers, etc.

In the case of the GLK, this includes diesel used for the generator sets and propane gas for the kitchen, both from the central services. They are obtained through the environmental programme certified with the ISO 14001 standard and audited annually by AENOR. The source of the emission factors are the MITECO emission factors and the IPCC 2006 guidelines. There are no regulated emissions under emission trading schemes.

Mobile sources

Mobile sources include all forms of transport and motor vehicles, as well as temporary sources⁸ that change location. For most entities, this calculation will refer to the consumption of those vehicles for which they are responsible for fuel costs. This includes both owned vehicles as well as those leased, rented, etc.

In the case of the GLK there are no mobile sources as there are no vehicle fleets.

Fugitive emissions

Fugitive emissions are emissions resulting from intentional or unintentional releases (e.g. equipment packaging) and emissions of hydrofluorocarbons (hereafter, HFCs) during the use of air conditioning and refrigeration equipment.

In the event of the entities having refrigeration and/or air-conditioning equipment, it is necessary to know the type of refrigerant gas or mixture of refrigerant gases (referred to as a preparation) consumed by the equipment and to have a record of the quantity (kg, g, etc.) of gas that has been recharged into each piece of equipment during the study year. The amount of gas that escaped during the exercise equals the amount of gas that is recharged during the exercise.

The GWP values for refrigerant gases are included in the IPCC Fourth Assessment Report, 2007 and approved on 11/12/2011 by the UNFCCC and are available in Appendix II of the guide for Carbon Footprint Calculation from an organisation of the Ministry for Ecological Transition and Demographic Challenge (hereafter, MITECO).

In the case of the GLK, the F-Gas charges of the air-conditioning units are recorded in the maintenance application, differentiating the type of gas used.

Scope 2

Scope 2 covers indirect GHG emissions from the consumption of purchased electricity, steam or heat. The activity data is the consumption of electricity⁹ from external suppliers during the year for which the calculation is being made. Therefore, the data to be used are the kWh reflected in the electricity bills of the year in question.

In the case of the GLK, all electricity is purchased from renewable sources, so Scope 2 emits no GHGs.

Scope 3

Scope 3 emissions include indirect emissions that are a consequence of an entity's activity but are associated with sources that are not owned or controlled by the entity.

Taking Scope 3 emissions into account means considering GHG emissions along the value chain and product portfolio of financial institutions to comprehensively manage GHG-related risks and opportunities. In other words, both upstream emissions (related to the purchase of goods or services) and downstream emissions (related to the sale of goods or services) are considered.

Scope 3 emissions are mainly calculated from data provided by service providers that are directly related to specific activities in the entities' value chain.

This may be the case for Category 1: Goods and services procured - in relation to contracted services for the control of the entity -, or Category 5: Waste generated in the activity. However, data may also come from internal surveys, such as those on employee mobility (fuel consumed and kilometres travelled), as is the case in category 7: Employee commuting. The emission factors used are from official sources.

Among the categories under Scope 3, a selection has been made on the basis of a rationale of impact. To this end, within the framework of the methodological development, an analysis of the reporting practices of the participating institutions, as well as of relevant national and international institutions, has been included.

The categories are:

| Category | Breakdown | Formula |
|--|--|--|
| Category 1. Goods and services procured | Volume (m ² /kg/units) of material purchased by the financial institution for the course of its daily business in its premises or branches. Also electricity consumption associated with the contracting of external services outside the entity's control to support the course of its daily activities. | $\sum (\text{Volume per Type of Material Purchased} \times \text{Emission Factor}) + \sum (\text{Energy Consumption of Contracted Services} \times \text{Emission Factor})$ |
| Category 4. Upstream transportation and distribution | Distance travelled (km) associated with the inter-office mail transport system between facilities/branches of the entity, to ensure the course of its daily activity. | $\sum (\text{Distance Travelled} \times \text{Emission Factor})$ |
| Category 5. Waste generated in the activity | Volume (kg) of waste generated in the financial institution's premises/branches during the course of its daily business. | $\sum (\text{Volume per Waste Type} \times \text{Emission Factor})$ |
| Category 6. Business travel | Distance travelled (km) and/or fuel consumed by employees, derived from travel involved in business trips. Also number of nights spent in hotels, associated with the same casuistry. | $\sum (\text{Distance Travelled per Transport Type} \times \text{Emission Factor}) + \sum (\text{Fuel Consumed per Fuel Type} \times \text{Emission Factor}) + \sum (\text{No. of Overnight Stays per Country} \times \text{Emission Factor})$ |
| Category 7. Employee commuting | Distance travelled (km) and/or fuel consumed (l) by workers to get to their place of work. | $\sum (\text{Distance Travelled per Transport Type} \times \text{Emission Factor}) + \sum (\text{Fuel Consumed per Fuel Type} \times \text{Emission Factor})$ |

Category 1: Goods and services procured

The category refers to emissions from goods and services purchased by the financial institution that are used in the performance of its activities

| Emission source | Description | Unit of measurement | Source of activity data |
|--|---|---------------------|-------------------------|
| Water | Water consumption associated with the financial institution's facilities and branches | m3 | Purchase invoices |
| Paper | Acquisition of paper associated with the daily activities carried out in the financial institution's facilities and branches | kg | |
| Black toner | Purchase of ink cartridges for the performance of the daily activity in the financial institution's facilities and branches | units | |
| Colour toner | Purchase of colour ink cartridges for the performance of the daily activity in the financial institution's facilities and branches | units | |
| External services for the control of the entity | Energy consumption associated with the outsourcing of services for the control of the entity (DPC (Data Processing Centre), servers, cloud, etc.) | kWh | Service providers |

The following elements of the environmental programme have been incorporated in the GLK:

- Water consumed
- Total paper consumed
- Black toner

Category 4: Upstream transportation and distribution

This category includes emissions associated with the internal transport and distribution of materials between its facilities and/or branches by inter-office mail transport system (post, other physical courier, etc.). The Methodology's External Data Source (Inputs) is DEFRA.

The total number of kilometres covered by the inter-office mail service provided by the external service provider has been used.

Category 5: Waste generated in the activity

The emissions in this section are related to the waste generated by the activities of the entities and include all of these, i.e. packaging waste, paper and cardboard, glass, lamps, batteries, hazardous waste and waste electrical and electronic equipment (hereinafter, WEEE).

The Methodology's External Data Source (Inputs) is: OCCO and MITECO

Two types of waste have been used:

- The paper and cardboard of the environmental programme
- Kgs of WEEE reported by the two waste management companies.

Category 6: Business travel

This category includes the emissions associated with the organisation's business trips, specifically those derived from air, train, taxi and overnight stays. The Methodology's External Data Source (Inputs) is the IDAE.

Three sources are used:

- Kilometres travelled by taxi drivers with whom transport agreements have been established.
- The kilometres paid in the settlement of expenses (per diems) incurred by staff in the course of their work.
- Emissions from air and train journeys arranged through a travel agency with which an agreement is in place and which provides an emissions certificate.

Category 7: Travel of employees to their job location

Emissions in this category are associated with employees' commuting from their homes to the workplace (internal transport or in itinere commuting), which includes employees' journeys by: car, shared transport, public transport and train. The data source is also the IDAE.

In the case of the GLK, the results of a mobility survey conducted in 2022 among the entire workforce are used. The survey results provide information on the different types of mobility used: individual car, car sharing, public transport, motorbike, walking... with average distances from home to work. This distribution is extrapolated to the entire workforce. The mobility survey will be updated in 2025.

No information is disclosed for categories 2, 3, 8, 9, 10, 11, 12, 13 and 14 due to the characteristics of the financial and insurance business which do not generate issues in these categories. There are no entities with operational control outside the consolidated group.

The percentage of emissions calculated using primary data obtained from suppliers or other value chain partners in 2024 is 1.17%.

The **intensity** of the greenhouse gas emissions (GHG):

| GHG intensity | 2024 | 2023 |
|-----------------------------------|--------------|--------------|
| Operational emissions | 3,531.15 | 3,228.20 |
| Financed and investment emissions | 2,342,522 | 1,713,923 |
| Sum total | 2,346,053.15 | 1,717,151.20 |
| Total assets (thousands of €) | 26,775,875 | 26,053,051 |
| Intensity | 87.6 | 65.9 |

Measured as total CO2 emissions per net income (total assets).

[E1-7] GHG phase-out and GHG mitigation projects financed by carbon credits

The LABORAL Kutxa Group does not apply GHG phase-out or GHG mitigation projects financed through carbon credits.

[E1-8] Internal carbon price

The LABORAL Kutxa Group does not apply internal carbon pricing systems.

[E1-9] Expected financial impacts of material physical and transitional risks and potential climate-related opportunities

The Entity does not provide prescribed information on the expected financial effects of material physical and transitional risks and potential climate-related opportunities in this first year of preparing the sustainability statement, in accordance with Appendix C of the CSRD.²

In compliance with Law 11/2018, information is published on resources dedicated to the prevention of environmental risks and the amount of provisions and guarantees for environmental risks.

| Direct costs allocated to the environmental management system | 2024 | 2023 |
|---|---------------|---------------|
| Maintenance of the EMS (1) | 1,857 | 1,089 |
| Waste management (2) | 4,496 | 1,563 |
| Environmental promotion | 5,907 | 8,724 |
| Measurements (discharge) | - | 599 |
| Total in € | 12,310 | 11,975 |

(1) IZAITE and legal requirements.

(2) Removal of Paper, oil and Safety Advisor

These expenses are those directly managed by the Environmental Committee and do not include costs managed by specific departments or any investments made. **Seguros Lagun Aro** does not have specific items for this purpose.

Nor is it considered necessary to make provisions or guarantees for direct environmental risks.

² The company may omit the information prescribed in NEIS E1-9 in the first year of preparing its sustainability statement. The company may comply with NEIS E1-9 by disclosing only qualitative information, during the first three years of preparing its sustainability statement, if it is impossible to prepare quantitative disclosures.

NEIS E2-Pollution

[[IRO-1] Description of the processes for identifying and assessing climate-related impacts, risks and opportunities

This information is described in section NEIS2-IRO1.

NEIS E3- Water and marine resources

[[IRO-1] Description of the processes for identifying and assessing the impacts, risks and opportunities related to water and marine resources.

This information is described in section NEIS2-IRO1.

In compliance with Law 11/2018, the water consumption of the Central Services (not the branch network) is published

| Water consumption (m3) at Headquarters* | 2024 | 2023 |
|---|-------|-------|
| Water consumption (1) | 7,932 | 5,850 |

*Given that the data for the 4th quarter is not available at the close of this report, the data for the last quarter of the previous year and the first three quarters of the reported year are used to calculate this volume.

NEIS E4-Biodiversity and Ecosystems

[[IRO-1] Description of the processes for identifying and assessing the impacts, risks and opportunities related to water and marine resources.

This information is described in section NEIS2-IRO1.

NEIS E5-Use of resources and circular economy

[[IRO-1] Description of the processes for identifying and assessing the impacts, risks and opportunities related to the use of resources and circular economy.

This information is described in section NEIS2-IRO1.

In compliance with Law 11/2018, the following information is added:

The correct management of waste is carried out as part of the environmental certification. In addition, the most relevant waste, paper to be recycled and toner, are managed centrally for all work centres. The most significant waste related to our activity are indicated below:

| Waste | Unit | 2024 | 2023 |
|----------------------------------|-------------|----------------|---------------|
| Cardboard and paper waste | Kg | 103,055 | 79,240 |
| Scrap | Kg | 83,820 | 80,720 |

The main used resource considered in the environmental programme is paper:

| Kilograms/Group | 2024 | 2023 |
|-----------------------------|----------------|----------------|
| Advertising paper | 54,458 | 63,832 |
| Branch paper | 209,205 | 205,250 |
| Total paper consumed | 263,663 | 269,082 |

Given the activity carried out, food waste is not relevant. In 2020, however, an online booking system for access to the Central Services canteen was implemented, which allows the number of meals prepared daily to be adjusted.

Taxonomy Regulation (EU)

The Entity discloses information related to taxonomy and GAR (green asset ratio) according to its best understanding of Regulation 2020/852 and of Delegated regulations (EU) 2021/2178, 2021/2139, 2023/2485, 2023/2486.

In addition, in accordance with Article 10 of Delegated Regulation 2021/2178, the Entity shall disclose information related to the trading portfolio as of 1 January 2026.

According to Delegated Regulation 2021/2178, Appendix V states that “*the GAR shall be based on the exposures and the balance sheet according to the scope of prudential consolidation...*”, and therefore in the following tables only information relating to the LABORAL Kutxa entity will be shown.

The ultimate objective of these regulations is to know what part of the assets of financial institutions can be considered environmentally sustainable, according to the criteria of the environmental taxonomy. To this end, a total of 28 templates have been disclosed, of which four refer to the templates of the previous year (T-1). Below, first the summaries of the most relevant templates will be displayed with their qualitative explanatory part. And then, in Appendix I, all templates will be shown in full.

Most of these templates have to be disclosed in terms of both capex and turnover. 15 of them relate to on-balance sheet assets of financial institutions, 4 relate to off-balance sheet assets and 9 relate to specific information on nuclear or natural gas related activities.

All these templates contain a wealth of information. However, as mentioned above, for a better understanding, some of them will be shown below in summarised form, showing only the most relevant information and qualitative explanations.

It should be noted that in the templates where both capex and turnover information is disclosed, only capex information will be shown in this summary.

With regard to the objectives of environmental taxonomy, there are 6 different ones:

1. Climate change mitigation.
2. Adapting to climate change.
3. Pollution prevention and control.
4. Transition to a circular economy.
5. Sustainability and protection of water and marine resources.
6. Protection and restoration of biodiversity and ecosystems.

The Entity has established the above order of precedence with respect to these objectives.

Finally, it is worth noting that the Entity faces difficulties in establishing strategies to increase the assets on its balance sheet in line with the taxonomy. These difficulties are particularly evident on the business side, where, with many small and medium-sized companies (SMEs) in its portfolio, most of them are far from the criteria of the environmental taxonomy, making it difficult for the Entity to establish relationships with these counterparties or to take these criteria into consideration when designing new products. On the other hand, as far as mortgages are concerned, the Entity is taking steps to increase the financing of homes that could fall within the technical taxonomy criteria, such as improving by 2 p.p. the *pricing* of mortgages with the best energy certificates.

GAR 001-003

GAR 001 and 003 are grouped together in the same template because they refer to the same information: The Entity's assets that are eligible or aligned with the environmental taxonomy. The difference is that GAR 001 is reflected in the form of an amount, while GAR 003 is in the form of a percentage.

| Million euros | GAR001 | GAR003 |
|------------------------------|--------|---------|
| Total assets Laboral Kutxa | 27,487 | |
| Assets eligible for the GAR | 17,769 | 100 |
| Assets eligible for taxonomy | 10,244 | 57.65 % |
| Assets aligned with taxonomy | 842 | 4.74 % |

As of 31/12/2024 the Entity has assets valued at 27,487 million euros. However, there are a number of assets such as central government and supranational issues; exposure to central banks; and trading book that are not included in the GAR calculation. These items add up to 9,718 million euros, bringing the eligible assets for the GAR to 17,769 million euros.

Of these, it is worth mentioning that there are a number of assets which, although they are eligible for GAR, can in no case be either eligible or aligned. This includes non-financial reporting companies (mostly small and medium-sized enterprises (SMEs)), counterparties in non-EU countries not subject to disclosure requirements under the NFDR, interbank overnight loans and cash and cash-linked assets.

For the Entity, all these items represent a large amount, specifically 6,534 million euros, as SMEs are highly representative in its balance sheet.

Among the eligible assets, 10,244 million euros can be recorded, most of which are related to the climate change mitigation objective, as this objective has been prioritised. This figure corresponds to 57.65% of the assets eligible for GAR.

Within the eligible assets, there are four distinct items. The most representative item is the one referring to households, amounting to 10,037 million euros. Within households, the most important item is considered to be loans secured by residential real estate, i.e. mortgages. However, there is also a small amount for car loans.

This is followed by non-financial companies, repos and financial companies, with amounts of 121, 47 and 39 million euros, respectively.

Finally, there are the taxonomy-aligned assets, which are those that can be considered truly environmentally sustainable due to meeting the technical selection criteria. For the Entity, these assets amount to 842 million euros, representing a ratio of 4.74%.

In this respect, it is important to note that the Entity has encountered difficulties in gathering the necessary information to assess the alignment of different items. For example, one could mention the case of car loans, which could not be considered as aligned at all.

A breakdown of aligned assets shows that 770 million euros corresponds to mortgages, which means that 7.67% of mortgages are aligned. This alignment is based on the Entity's interpretation of Article 7.7 of Appendix 1 of Delegated Regulation 2021/2139. Information has also been obtained from both internal and external sources.

At the same time, the alignment ratio for non-financial companies is 7.45% (70 million euros), while the alignment ratio for financial companies is only 0.94% (2 million euros). This company information is extracted from a sectoral project where public information disclosed by companies is collected.

A comparison with the previous year's data, disclosed in the GAR 001 T-1 templates, shows that eligibility stands at 10,294 million euros, while alignment stands at 665 million euros. Therefore, it can be seen that both eligibility and alignment have increased. The increase over the alignment is 177 million euros.

GAR 002

GAR 002 refers to the breakdown of one of the items of GAR 001. Specifically, it refers to non-financial companies which are obliged to report non-financial information and which are eligible for taxonomy. GAR 002 is a breakdown of these companies by their NACE. These would be Laboral Kutxa's data:

| NACEs (millones de euros) | Elegibles para taxonomía | Alineados con taxonomía |
|--|--------------------------|-------------------------|
| 1039 - Otro procesado y conservación de frutas y hortalizas | 1 | 0 |
| 1061 - Fabricación de productos de molinería | 1 | 0 |
| 2540 - Fabricación de armas y municiones | 3 | 0 |
| 2611 - Fabricación de componentes electrónicos | 1 | 0 |
| 2815 - Fabricación de cojinetes, engranajes y órganos mecánicos de transmisión | 1 | 0 |
| 2822 - Fabricación de maquinaria de elevación y manipulación | 1 | 0 |
| 3020 - Fabricación de locomotoras y material ferroviario | 43 | 33 |
| 4110 - Promoción inmobiliaria | 10 | 0 |
| 4213 - Construcción de puentes y túneles | 1 | 0 |
| 4222 - Construcción de redes eléctricas y de telecomunicaciones | 1 | 0 |
| 4621 - Comercio al por mayor de cereales, tabaco en rama, simientes y alimentos para animales | 4 | 0 |
| 4711 - Comercio al por menor en establecimientos no especializados, con predominio en productos alimentarios | 16 | 15 |
| 6820 - Alquiler de bienes inmobiliarios por cuenta propia | 2 | 0 |
| 9999 - NACEs no incluidos en Taxonomías | 35 | 22 |
| TOTAL | 120 | 70 |

As can be seen, the most representative NACEs for both eligibility and alignment are the following:

- Manufacture of locomotives and railway stock (3020).
- Retail trade in non-specialised shops (4711).

Compared to the previous year, while alignment remains stable, eligibility has decreased by 20 million euros. As regards the most significant NACEs, there is no change, since the previous year 3020 and 4711 were also the most significant NACEs.

GAR 005

The various GAR005 templates require data from two different items: Financial guarantees and assets under management.

It should be noted that, with regard to assets under management, for 2024 the Entity has encountered limitations and has not been able to gather information on this item, as was done in 2023. It is therefore not possible to make a comparison between the two years.

NUCLEAR AND NATURAL GAS TEMPLATES (N&G)

In relation to specific information on natural gas and nuclear related activities, which are specified in Delegated Regulation 2022/2014, nine templates are published in this respect. These templates are as follows: GAR NyG 001, GAR NyG 002 Capex/Turnover, GAR NyG 003 Capex/Turnover, GAR NyG 004 Capex/Turnover, GAR NyG 005 Capex/Turnover.

These templates show that the Entity, while not having any exposures associated with nuclear activities, does have exposures to two of the fossil gas activities. These exposures amount to 625,517 euros, all of which is considered as eligible under taxonomic activities 4.29 and 4.31. At the same time, it should also be mentioned that this entire amount is considered as non-aligned. All this information has also been obtained from a sectoral project.

SOCIAL INFORMATION

NEIS S1-Own personnel

[SBM-2] Stakeholders' interests and views

This information is described in section NEIS2-SBM2.

[SBM3] Material impacts, risks and opportunities and their interaction with the strategy and business model

Following the dual materiality assessment process specified in NEIS 2-IRO 1, within the sub-topic own personnel, material impacts and risks have been identified in the sub-subtopics working conditions, and equal treatment and opportunities for all, specifically:

| Sub-topic | Impacts | Risks |
|--|--|---|
| Working conditions. | Worsening of staff welfare due to inadequate working conditions. Improved staff welfare through optimal working conditions. | |
| Equal treatment and opportunities for all. | That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect. | Loss of motivation and productivity in the workforce because they feel conditioned by their gender, origin, race, sexual orientation or any other aspect. |

Regarding the interaction of these IROs with the strategy and business model with the Entity, the following is disclosed:

LK's staff is mainly made up of cooperative members, in line with our vocation to generate cooperative employment. Exceptionally, we use other types of contracts for recruitment and/or training, in order to respond to the necessary adaptation and learning periods for people, or to deal with temporary workload situations, because our Articles of Association do not contemplate fixed-term contracts. These additional figures to the working partner, such as employees, represent around 10% of the total employment of the Entity.

As mentioned in the previous section, membership of the cooperative involves a dual role, as a professional and as a cooperative member, and we therefore differentiate between two areas of participation:

- institutional or social, power-sharing, which is structured through the General Assembly, the Governing Board and the Social Board, and

- participation in management, which, in turn, requires: the development of appropriate mechanisms and channels for participation, transparency of information, the practice of consultation and negotiation methods for decision-making, and the systematic implementation of training plans.

And, in addition, we share in the profits or losses. Working people are the main creditors when it comes to distributing the wealth generated. Part of the available business surpluses are distributed in the form of returns to the cooperative members in proportion to the work performed or the cooperative activity.

The Mondragon Cooperative Experience implies the acceptance of a democratic organisation that takes the form of:

- The Sovereignty of the General Assembly composed of the entirety of the members, where each member shall have one vote.
- The democratic election of the governing bodies and specifically of the Governing Board (the Assembly elects the Governing Board), and the appointment, through the Governing Board, of the General Management, to which the strategy and management of the Entity is delegated.
- The CEO is assisted and advised by a Board of Directors.
- The election of the Social Board, a body for the permanent participation of the worker community in the management of the cooperative, through:
 - Advising workers on standards, decisions of the Governing Board and the executive management.
 - Information to the partners on important decisions of the Governing Board and the executive management, and to the former regarding the concerns, suggestions and proposals of the partners.
 - Negotiation, in matters referred to in collective bargaining regulations.
 - Social Control, on agreements and decisions.

A basic principle is sufficient and solidarity-based remuneration for work. Sufficient, in accordance with the real possibilities of the cooperative and solidarity, materialised in:

- the existence of a solidarity-based framework of internal remuneration for work, through the establishment of a remuneration range that limits the consumption advances of each worker-member to a ratio of 1.30 (minimum remuneration) to 8.25 (highest remuneration), with the average rate for the cooperative being 2.40.
- internal remuneration should be comparable with that of salaried workers in the sector. Solidarity is further emphasised in managerial positions (rates above 3), which have lower levels of remuneration than those received by other professionals of equivalent responsibility, and which in the most senior positions can reach up to 50%

Concern for the promotion of equality is a principle rooted in our origins that has gradually taken the form of a commitment through the various equality plans that have followed one after the other since 2008. During 2024 we have undertaken an ambitious diagnostic task, both quantitative and qualitative, which has taken shape in the V Equality Plan that will be developed over the next 4 years.

To this end, we have an active and stable structure, adequate financial resources and the commitment of Management.

Throughout the four previous plans, we have worked to increase the participation of women in positions of responsibility and today we are an equal organisation (51% women) where the presence of women in the highest professional categories has increased to 30% of the members of the Board of Directors, 36% of branch management and 50% of the Governing Board, among others.

In addition, we have worked on developing a more androgynous leadership style, improving women's perception of their leadership capacity, generating changes in their identities, beliefs, values and attitudes, and raising men's awareness of the unequal opportunities among women and men to access positions of responsibility and the need for them to accompany women in this cultural change in the organisation.

The V Equality Plan, which is about to be launched, sets new challenges and objectives so that we may continue to be a benchmark and promoter of equality.

No material IROs on child and forced labour are observed.

[S1-1] [MDR-P] Policies related to own personnel

LABORAL Kutxa has several policies to promote adequate working conditions and equal treatment and opportunities for all its own personnel. They address issues related to good working conditions: employment security, working time, adequate wages, social dialogue, participation of workers' representatives, health and safety and work-life balance.

With regard to equal treatment and opportunities for all, the Entity promotes gender equality, diversity, equal pay and training, development and promotion of its own personnel, regardless of gender, race and ideology.

The policies described below relate to the two sub-topics identified as material:

- Working conditions.
- Equal treatment and opportunities for all.

Given the Group's scope of action, exclusively in Spain, there are no policies related to human rights and its own personnel. It is considered that compliance with current legislation, reinforced in this case by the legal form of a worker cooperative, does not require it. For the same reason, the policies detailed below have not taken into consideration the Guiding Principles of the United Nations nor do they contemplate forced or child labour.

Therefore, all detected IROs are also affected by:

- Worsening of staff welfare due to inadequate working conditions. (Impact)
- Improved staff welfare through optimal working conditions. (Impact)
- That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect. (Impact)
- Loss of motivation and productivity in the workforce because they feel conditioned by their gender, origin, race, sexual orientation or any other aspect. (Risk)

Recruitment policy

- It relates to adequate working conditions (secure employment, adequate wages...) and equal treatment and opportunities for all (equal pay for work of equal value, training and skills development...).
- The policy addresses issues such as the remuneration scheme and the training and career development plan for new recruits.
- Description of the main contents of the policy:
 - The policy is developed with scrupulous respect for national and international labour regulations.
 - It excludes the possibility of discrimination. Equality plans are available to address this risk.
 - It establishes different incorporation itineraries according to the professional profile of the person to be incorporated.
 - It establishes the criteria for action in contractual matters for new recruits.
 - It establishes the remuneration criteria for new recruits.
 - It establishes the criteria for training and professional development for new recruits.
- The policy is approved by the Governing Board, with a favourable position of the Social Board (workers' representation).
- The policy is recorded in the relevant minutes of the plenary session of the Social Board.

Occupational health & safety policy

- It relates to the protection of workers' health, the prevention of accidents, the promotion of the health and well-being of the workforce, as well as appropriate working conditions.
- The policy is part of the health and safety management system. The system is ISO 45001 certified and is audited annually by AENOR.
- Description of the main contents and commitments of the policy:
 - The identification, assessment and effective control of work-related risks in order to protect the health, safety and well-being of all personnel and the sustainability of the workplace.
 - The development of health promotion activities that disseminate healthy lifestyles, promote a culture of physical activity and enhance personal relationships.
 - The information and training of all personnel with regard to occupational hazards and the measures necessary for their prevention.
 - The integration of occupational health and safety criteria into the Entity's activities and at all hierarchical levels, promoting a preventive culture through the education and training of workers, and allowing their participation in the identification of possible improvements that make workplaces increasingly safer and more comfortable.
 - Compliance with applicable legal requirements on occupational health and safety.
- The policy was approved by the Governing Board, with prior validation by the Health and Safety Committee, where there is an equal composition of the workforce.

Recruitment, selection and internal mobility policy

- It relates to equal treatment and opportunities for all (gender equality, promotion and development of skills...).
- It addresses the criteria for attracting and recruiting people, establishes the procedure and tools for selection processes and promotes internal mobility through public offers for all members.
- Description of the main contents of the policy:
 - It encompasses the systems, processes and tools related to recruitment, external selection and internal mobility: Partnerships with universities, collaboration with external professionals, publication of advertisements on the web, phases of selection processes, tests in selection processes, etc.

- It explicitly addresses equal opportunities.
- It explicitly excludes discrimination based on gender, race and ideology.
- It explicitly promotes the promotion of diversity and inclusion.
- Its scope reaches all people.
- The policy is approved by the Human Resources Committee.
- It respects both internal regulations and external labour legislation.

Remuneration-assessment policy

- It relates to adequate working conditions (adequate wages, social dialogue...) and equal treatment (equal pay for work of equal value).
- It deals with the general remuneration system and also with the treatment of specific situations. It also establishes the assessment procedure and the bodies involved in this assessment, giving an important role to the Social Board (workers' representation).
- Description of the main contents of the policy:
 - Basis of the remuneration system: general concepts, provision advance, consumption advance, extraordinary payments, seniority bonus, etc.
 - Treatment of specific situations: overtime, night work, public holidays, job changes...
 - Bodies in the assessment procedure: Governing Board, Director General, Social Board and the Assessment Committee.
 - Procedure for assessment and allocation of rates.
- The policy covers all members.
- The policy is approved by the Governing Board, subject to a prior favourable report of the Social Board (workers' representation).
- The policy is published on the Cooperative's Intranet.

Internal rules of procedure

- It relates to adequate working conditions (working time, social dialogue, freedom of association, the existence of workers' representation, collective bargaining, work-life balance...) and equal treatment and opportunities for all (equal pay for work of equal value, training and skills development...).

- It addresses issues such as: the composition and competences of the workers' representation (Social Board), working days and hours, leave of absence, training and promotion of members and the regulation of strikes.
- Description of the main contents of the policy:
 - The composition of the Social Board (workers' representation) and its competences are established.
 - It establishes the regulatory framework for working days and hours, as well as bank holidays, days off and holidays.
 - Paid and unpaid leave is established to promote work-life balance.
 - The different types of leave available to members are regulated.
 - The requirements for the promotion of training and professional advancement of the members are regulated.
 - Strike actions are regulated.
 - The Regulation is in line with both national and international law.
 - It explicitly promotes the promotion of diversity and inclusion.
- The Regulation applies to all members.
- It is approved at the General Meeting.
- It is published on the Cooperative's Intranet.

Application requirements S1-1 AR 14 and AR 17 a), b), c), d), e), f), g) and h) are omitted due to being voluntary under the CSRD.

[S1-2] Processes for collaboration with workers themselves and workers' representatives on impacts

As specified in section S1-1, the processes described below encompass all sub-topics and impacts detected as material in the dual materiality process, in particular:

- Affected sub-topics:
 - Working conditions.
 - Equal treatment and opportunities for all.
- Affected impacts:
 - Worsening of staff welfare due to inadequate working conditions. (Impact)

- Improved staff welfare through optimal working conditions. (Impact)
- That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect. (Impact)
- Loss of motivation and productivity in the workforce because they feel conditioned by their gender, origin, race, sexual orientation or any other aspect. (Risk)

Laboral Kutxa's social activity, given its status as a Credit Cooperative, is carried out in two complementary areas:

- ⇒ Institutional sphere, or the expression of the social will through the Basic Norms, the General Assembly and the Resources Committee, as a substitute body for the General Assembly in certain functions established in the Basic Norms.
- ⇒ Social and labour relations sphere, or the organisation of people and the harmonisation of individual and group interests, through the joint action of executive and social bodies such as the Board of Directors, the Social Board and the Governing Board.

In the field of social and labour relations, therefore, workers have at their disposal a social body such as the Social Board. This is a body for the permanent participation of the worker-members in the cooperative, representing the worker-members as workers before the internal governing bodies and acting as a spokesperson for the aspirations of these members. The members of the Social Board are responsible for gathering, channelling and dealing with any concerns or suggestions that may arise within the scope of the people they represent.

These concerns or suggestions are received directly from the workers or through regular meetings in which the social counsellors inform the rest of the staff of the issues they are dealing with and listen to their needs.

The basic functions of the Social Board are advisory and information, negotiation and social control. Likewise, and within the scope of its competences, the Social Board shall have the power of initiative to intervene in those matters it considers to be of interest to the people it represents.

It establishes the actors that will participate in the process - Governing Board, Executive Board and Social Board- and their functions, the matters to be negotiated (remuneration, working time, functional mobility, geographical mobility, compensation of expenses, training grants, assistance grants, etc.) and an annual negotiation procedure.

It also establishes the mechanisms for action in situations of non-agreement and non-compliance with the agreements reached.

With regard to the personnel of Caja Laboral Bancaseguros S.L.U. (CLBS, a company which is wholly owned and operated by LABORAL Kutxa), all of whom are employees, the working conditions are set out in its own collective agreement, which was renewed in 2024, and in the general labour legislation. This agreement, which governs the professional and labour aspects that directly affect the group of workers, has a significant level of convergence with the labour regulations and procedures of LABORAL Kutxa.

Application requirements AR 25 and AR 26 are omitted as they are voluntary under the CSRD.

[S1-3] Processes for redressing negative impacts and channels for workers themselves to raise concerns

As specified in section S1-1, the processes described below encompass all sub-topics and impacts detected as material in the dual materiality process, in particular:

- Affected sub-subtopics:
 - Working conditions.
 - Equal treatment and opportunities for all.
- Affected impacts:
 - Worsening of staff welfare due to inadequate working conditions. (Impact)
 - Improved staff welfare through optimal working conditions. (Impact)
 - That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect. (Impact)
 - Loss of motivation and productivity in the workforce because they feel conditioned by their gender, origin, race, sexual orientation or any other aspect. (Risk)

With regard to adequate working conditions and equal treatment and opportunities for all, the Social Board performs a social control function, carrying out adequate control over all the agreements and decisions adopted, and their compliance, usually through participation alongside management in the monitoring committees that establish these agreements.

In particular, it ensures compliance with the policies and measures adopted in order to permanently improve labour relations, participation systems and the channels for adequate and sufficient information for the social and labour community.

In addition to the above, the Social Board has, with regard to adequate working conditions and equal treatment and opportunities for all, decision-making powers such as:

- Resolve appeals on disciplinary proceedings for labour offences, except in the case of expulsion, subject to the presentation of the corresponding appeal by the member in question.
- Cancel, except in the case of expulsion, and at the request of the concerned party, the part of the outstanding sanctions, or the annotations of past sanctions, of members who in its opinion have been rehabilitated.
- Mitigate the general conditions for the granting of voluntary leave of absence to working partners and to resolve any incidents that may arise in connection therewith.
- Ratify the assessments presented by the Director-General, as proposed by the Assessment Committee, in relation to the structural rates.
- Decide on the personal appeals that may be lodged in relation to the structural assessment, based on the assessment criteria used.

Finally, it should be noted that a URL link has been included on the home page of the Laboral Kutxa corporate website, under the heading “Whistleblowing Channel”, which allows access to the Internal Reporting System through the EQS Integrity Line tool. This is a channel for submitting complaints of various natures, including labour incidents, and is also the database where all complaints received are recorded, as well as any decision and/or action taken in relation to them. It is the tool to be used by the Ethics Committee to organise and document the performance of its tasks.

Similarly, Seguros Lagun Aro has set up a URL link on the home page of its corporate website, under the heading “Whistleblowing Channel”, which allows access to the Internal Information System through the same tool as in Laboral Kutxa and which is also managed by the Insurance Company’s Ethics Committee.

Application requirements AR 29 and AR 30 are omitted as they are voluntary under the CSRD.

[S1-4] [MDR-A] Adoption of measures on material impacts on own personnel, and approaches to manage material risks and take advantage of related material opportunities and effectiveness of such measures

The impacts, risks and opportunities of own personnel are:

- Worsening of staff welfare due to inadequate working conditions. (Impact)
- Improved staff welfare through optimal working conditions. (Impact)
- That the workforce is conditioned by their gender, origin, race, sexual orientation or any other aspect. (Impact)
- Loss of motivation and productivity in the workforce because they feel conditioned by their gender, origin, race, sexual orientation or any other aspect. (Risk)

The measures adopted are:

Psychosocial risks

- A psychosocial risk assessment of own personnel has been carried out. The assessment was carried out by an external company, spanning two phases, one quantitative and one qualitative.

Diagnosis of the corporate culture

In 2025, a new edition of the survey on corporate culture will be carried out to compile the perception of workers on different cultural elements or levers. This edition of the survey has been aligned with the reflection on the Zentzua purpose in order to find out what is the predominant culture in the cooperative in relation to the desired culture according to Zentzua. The survey provides a picture of the situation of the workforce. Once the data has been analysed and conclusions have been drawn, lines of work in areas that may be misaligned will be incorporated into the 2026 management plans.

Percentage of TCA (employees) less than 20% in Laboral Kutxa

- This measure aims to have a TCA (employees) percentage significantly below the limit set by legislation. This is an objective set out in the Recruitment Policy.

[S1-5] [MDR-T] Objectives related to the management of negative material impacts, the promotion of positive impacts and the management of material risks and opportunities

Psychosocial risks

- Conduct training on the prevention of psychosocial risks with psychologists. The Zainduz healthy business programme will be used to organise them.
- Conduct training on the management of difficult customer situations by Stimulus experts.

Diagnosis of the corporate culture

- Targets will be set after analysis of the data.

Percentage of TCA (employees) less than 20% in Laboral Kutxa

The percentage will be measured on a monthly basis and an annual discharge will be made to the Social Board (workers' representation).

[S1-6] Characteristics of the Group's employees

Throughout the following tables the gender distribution is only between female and male. The information recorded is exclusively that of their DNI documents.

Table 1 Total employees by gender as at 31/12/2024

| Number of people | Female | Male | Total |
|------------------|--------|-------|-------|
| | 1,303 | 1,085 | 2,388 |

Not broken down by country as all employees are in Spain

Table 2 Type of employees as at 31/12/2024

| Contract type | 2024 | | Total |
|--|-------|-------|-------|
| | Women | Man | |
| Number of employees | 1,303 | 1,085 | 2,388 |
| Number of employees with a permanent contract | 1,138 | 974 | 2,112 |
| Number of specific employees | 165 | 111 | 276 |
| Number of non-guaranteed hours of specific employees | 0 | 0 | 0 |
| Number of full-time employees | 1,242 | 1,076 | 2,318 |
| Number of part-time tie employees | 61 | 9 | 70 |

Table 3: Total number and distribution of employees by gender, age and occupational classification as at 31/12/2024.

| EMPLOYEES | 2024 | | 2023 | |
|--|--------------|--------------|--------------|--------------|
| | Women | Men | Women | Men |
| Gender distribution | 1,303 | 1,085 | 1,245 | 1,064 |
| Age distribution | 1,303 | 1,085 | 1,245 | 1,064 |
| Below 30 years | 183 | 154 | 136 | 136 |
| Between 30 and 50 years | 605 | 416 | 634 | 441 |
| Over 50 | 515 | 515 | 475 | 487 |
| Distribution by professional category | 1,303 | 1,085 | 1,245 | 1,064 |
| Directors | 14 | 38 | 14 | 34 |
| Managers | 147 | 239 | 144 | 247 |
| Technicians | 779 | 600 | 748 | 577 |
| Admin. staff | 363 | 208 | 339 | 206 |
| TOTAL EMPLOYEES | 2,388 | | 2,309 | |

Information provided to comply with Law 11/2018

Table 4 Total number and distribution of employment contract modalities as at 31/12/2024

| EMPLOYEES | 2024 | | 2023 | |
|---|--------------|--------------|--------------|--------------|
| | Women | Men | Women | Men |
| Distribution by Employment Contract Modalities | 1,303 | 1,085 | 1,245 | 1,064 |
| Specific_Full-time | 164 | 109 | 171 | 150 |
| Specific_Part-time | 1 | 2 | 3 | 1 |
| Permanent_Full-time | 1063 | 966 | 990 | 905 |
| Permanent_Part-time | 75 | 8 | 81 | 8 |
| TOTAL EMPLOYEES | 2,388 | | 2,309 | |

Information provided to comply with Law 11/2018

| ANNUAL AVERAGE | 2024 | | | | | | | | | |
|--|------------|-----------|--------------|-----------|--------------|------------|-----------|------------|-----------|-------------|
| | Women | | | | | Men | | | | |
| | Specific | | Indefinite | | Total | Specific | | Indefinite | | Total |
| | Full-time | Part-time | Full-time | Part-time | | Full-time | Part-time | Full-time | Part-time | |
| Age distribution | 164 | 1 | 1,063 | 75 | 1,303 | 109 | 2 | 966 | 8 | 1085 |
| Below 30 years | 137 | 1 | 45 | 0 | 183 | 94 | 2 | 58 | 0 | 154 |
| Between 30 and 50 years | 27 | 0 | 515 | 63 | 605 | 15 | 0 | 395 | 6 | 416 |
| Over 50 | 0 | 0 | 503 | 12 | 515 | 0 | 0 | 513 | 2 | 515 |
| Distribution by professional category | 164 | 1 | 1,063 | 75 | 1,303 | 109 | 2 | 966 | 8 | 1085 |
| Directors | 0 | 0 | 14 | 0 | 14 | 0 | 0 | 38 | 0 | 38 |
| Managers | 0 | 0 | 147 | 0 | 147 | 0 | 0 | 239 | 0 | 239 |
| Technicians | 48 | 0 | 680 | 51 | 779 | 46 | 1 | 548 | 5 | 600 |
| Admin. staff | 116 | 1 | 222 | 24 | 363 | 63 | 1 | 141 | 3 | 208 |

Information provided to comply with Law 11/2018

The average headcount in 2024 is 2,344 employees (2,093 in 2023), the averages are not broken down by gender, age and professional distribution as there are no significant fluctuations in staff between year-end and annual average.

Table 5 Employee turnover rate

| Number of people | |
|-----------------------|-----------|
| Voluntary Resignation | 21 |
| Voluntary Leave | 1 |
| Retirement | 29 |
| General total | 51 |

Turnover Rate: $51/2388 = 2\%$

We take into account retirements (excluding those on time off), voluntary departures (excluding those on voluntary leave) and voluntary leaves of absence. We do not take into account other types of leave of absence or end of contract.

In 2023 and 2024 there have been no redundancies in the Group companies.

[S1-7] Characteristics of non-salaried employees in the company's workforce

The Entity, in accordance with Appendix C³ of the CSRD, omits the reporting of all data points in this disclosure requirement in the first year of preparing its sustainability statement.

[S1-8] Collective Bargaining and Social Dialogue Coverage

The working conditions of all Laboral Kutxa's own personnel are determined by agreements adopted between the Management and the Workers' Representation.

In the Cooperative, the collective bargaining procedure explained in section S1-2 is followed, and in the insurance companies there are collective bargaining agreements negotiated and agreed between management and the corresponding Works Councils.

Collective bargaining falls within the scope of social and labour relations and it is the responsibility of the three bodies mentioned above to carry out bargaining on the matters specified in the Internal Regulations on Collective Bargaining. Once action in the framework of collective bargaining has been exhausted without resolving the conflict of interests, the social body may initiate action in the institutional sphere.

The aforementioned Internal Regulations, therefore, regulate the Collective Bargaining process by which the working conditions of the members are established, as well as the social guarantees that ensure their application.

As for the insurance companies, Seguros Lagun Aro maintains a fluid relationship with the Workers' Legal Representation (R.L.T.). A new statutory agreement was negotiated in 2022 for the period 2022-2025.

The Group does not have agreements with its employees for representation by a European Works Council.

³ The company may omit the reporting of all data points in this disclosure requirement in the first year of preparing its sustainability statement.

Table 8: Collective bargaining and social dialogue coverage 2024

| Coverage percentage | Caja Laboral Coop. Crédito ¹ | Seguros Lagun Aro S.A. | Caja Laboral Banca Seguros S.A. |
|---------------------|---|------------------------|---------------------------------|
| 0-19% | | | |
| 20-39% | | | |
| 40-59% | | | |
| 60-79% | | | |
| 80-100% | X | X | X |

(¹) It has labour standards, 90% of its employees are members.

[S1-9] Diversity metrics

Table 9: Diversity

| Senior Management ¹ | Female | Male | Total |
|---|--------|-------|--------|
| Distribution by number | 3 | 7 | 10 |
| Percentage distribution | 30 % | 70 % | 0.42 % |
| ¹ In Senior Management only the parent company is taken into account | | | |
| Employees | Female | Male | Total |
| < 30 years | 183 | 154 | 337 |
| | 54 % | 46 % | 14 % |
| Between 30 and 50 years of age | 605 | 416 | 1021 |
| | 59 % | 41 % | 43 % |
| > 50 years | 515 | 515 | 1030 |
| | 50 % | 50 % | 43 % |
| Total | 1,303 | 1,085 | 2,388 |
| | 55 % | 45 % | 100 % |

[S1-10] Adequate wages

The Minimum Inter-professional Wage in 2024 in Spain was set at €1,134 gross per month in 14 payments.

The lowest salary at LABORAL Kutxa corresponds to rate 1 with €1,446.37 gross per month in 14 payments.

The lowest salary in SLA corresponds to level 7B- A1 with €1,570.75 gross per month in 14 payments.

The lowest salary in CLBS corresponds to rate 1 with €1,446.37 gross per month in 14 payments.

The following table shows the remuneration of the members of the Board of Directors and the Managing Directors (including the Chairman) for their work as working partners.

Table 10: Remunerations Board and Senior Management (requirement Law 11/2018)

| LK Item (thousands of euros) | 2023 | 2024 |
|--|-------|-------|
| Total remuneration for their work (4 executive directors) ¹ | 535 | 405 |
| Remuneration Board of Directors (10 in 2024 and 9 in 2023) | 1,497 | 1,616 |
| Total | 2,032 | 2,021 |
| Average remuneration per person (14 in 2024 and 13 in 2023) | 156.3 | 144.4 |

Aside for this remuneration, the members of the Governing Board are remunerated through attendance allowances, except for its Chairman. 95 thousand euros in the financial year 2024 and 93 thousand euros in the financial year 2023.

| Average receipt of Council per diems | 2024 | 2023 |
|--------------------------------------|-------|-------|
| By Gender | | |
| Women | 6,495 | 8,022 |
| Men | 5,409 | 5,216 |

For the total of the Board's per diems, all persons who have served on the Board throughout the years 2023 and 2024 are considered.

| Average remuneration of the Board of Directors | 2024 | 2023 |
|--|------------------|----------------|
| By Gender | | |
| Women | 147,408.7 | 128,756 |
| Men | 170,544.4 | 157,753 |
| Total | 163,603.7 | 148,088 |

To calculate the average remuneration of senior management, only the parent company, Laboral Kutxa, which includes a total of 10 people, including the chairman, is considered. In 2023 there were 9 people. Only information from the parent company is provided.

Table 11: Remuneration of employees (requirement Law 11/2018)

| Average remuneration | 2024 | 2023 |
|----------------------|--------|--------|
| By Gender | | |
| Women | 49,034 | 46,602 |
| Men | 56,238 | 52,861 |

| | 2024 | | 2023 | |
|---------------------------------|---------------|-------------|---------------|-------------|
| By Age | Female | Male | Female | Male |
| < 30 years | 26,498 | 30,614 | 23,743 | 25,051 |
| Between 30 and 50 years | 47,216 | 59,710 | 46,615 | 51,936 |
| > 50 years | 53,484 | 66,789 | 53,130 | 61,464 |
| By Professional category | Female | Male | Female | Male |
| Directors | 112,959 | 102,670 | 95,266 | 104,986 |
| Managers | 72,466 | 73,451 | 65,779 | 67,754 |
| Technicians | 48,382 | 53,992 | 47,158 | 49,878 |
| Admin. staff | 30,400 | 48,552 | 35,221 | 34,754 |

[S1-11] Social protection

All of Laboral Kutxa's own personnel are covered by Social Security. The working partners pay contributions to the Self-Employed Workers' Regime, while employees pay contributions to the General Regime.

This means that working people are protected against major life events such as illness, unemployment, accidents at work and acquired disability. In addition, all own personnel have parental leave and the right to a retirement pension.

As regards the organisation of working time:

Work-life balance measures

The Internal System Regulation provides measures to reconcile personal and working life, as a way to alleviate, through permissions and/or specific leave, difficulties experienced by members of staff in meeting urgent family needs. They refer to aspects of working hours, remote working, paid and unpaid leave, as well as flexible working hours in Central Services and extending the possibilities of taking paid and unpaid leave.

Flexible working hours

All those who regularly work in the Central Services, both at Headquarters and in the Territorial Directorates, can take advantage of the flexible schedule system in terms of arriving and leaving. Since 2019, in order to facilitate work-life balance and encourage co-responsibility between parents, the working hours of these members of staff have been flexible. The company has now switched to a monthly calculation of hours, with a daily minimum of 5.15 hours of work and flexible entry and exit times. At the same time, members with children under 12 years of age and/or people dependent on them due to age or illness may, upon request and approval, extend the entry time until 9.30 a.m.

In addition, in 2022 the new agreement on flexible working was implemented. According to which, the Central Services and Territorial Directorates may have 1 or 2 days of flexible work, depending on whether their home is within 25km of the place of work. Subsidiaries will have the option to work 10 flexible days per year.

Lastly, there are currently no policies in place regarding work disconnection.

[S1-12] Persons with disabilities

Table 12: Persons with disabilities

This is the number of people with a disability in the Group for whom information is available, as at 31/12/2024.

| Number of persons with disabilities | Female | Male | Total 2024 |
|---|----------|-----------|------------|
| Degree between 33% and 65% with support | | 1 | 1 |
| Degree between 33% and 65% | 9 | 15 | 24 |
| Degree equal to or greater than 65% | | 2 | 2 |
| Total | 9 | 18 | 27 |

People with disabilities in 2024 account for 1.1% of the workforce.

In 2023 there were 26 people, 1.1% of the workforce.

[S1-13] Training and competence development metrics

Training, preparation and the development of people's skills are a strategic pillar for the organisation. The Training Plan for the year 2024 has reflected the main training guidelines and programmes.

The main objective of the Training Plan was to further develop the training of people in the knowledge and skills necessary to ensure the success of the *core* business through:

- Strategic training programmes: insurance, commercial, off-balance sheet business, business skills.
- Specialised training programmes in the different business areas and in regulatory requirements.
- Regulatory and policy training: accreditations and continuous refresher training.
- Cooperative education and training programmes.

In addition to continuing with training initiatives to transform the Entity, developing the necessary skills for the future in an increasingly digital and changing environment, such as digital skills, *data analytics* digital security, artificial intelligence (AI), agile methodologies...

All of this to progress towards a more agile and dynamic organisational learning model in which people are capable of adapting to the new skills required at any given time and in which we ensure that everything we learn is transferred to our work activity and to the business.

On the other hand, the Plan has been approached with a Group vision, integrating the people of Seguros Lagun Aro in the cross-cutting actions, according to the diagnosis of training needs carried out jointly.

Based on the 2024 Training Plan and adding training requests received during the year, the data on training hours per employee and by gender are as follows:

Table 13: Training

| Average hours of training by gender | Men | Women | Total |
|-------------------------------------|-------|-------|-------|
| Average hours* | 47.89 | 38.62 | 86.51 |

**To calculate the average hours, the total hours during 2024 have been considered across the average number of employees distributed by gender*

| Hours of training by professional category and gender | 2024 | | | 2023 | | |
|---|---------------|----------------|----------------|---------------|----------------|----------------|
| | Men | Women | Total | Men | Women | Total |
| Directors | 3,168 | 1,363 | 4,531 | 2,243 | 594 | 2,837 |
| Managers | 19,660 | 12,232 | 31,892 | 17,320 | 10,458 | 27,778 |
| Technicians | 51,481 | 68,958 | 120,440 | 47,602 | 62,758 | 110,361 |
| Admin. staff | 20,888 | 35,496 | 56,385 | 20,039 | 27,796 | 47,834 |
| Total | 95,197 | 118,050 | 213,247 | 87,204 | 101,606 | 188,810 |

Information provided to comply with Law 11/2018

In terms of professional and personal development, LABORAL Kutxa has a system called ONENAK BIDEAN aimed at the entire LABORAL Kutxa Commercial Network.

This system facilitates the evolution of the professional performance of each of the people who make up the network in a homogeneous manner and aligned with the roles and the commercial and managerial dynamics that are to be promoted within the framework of the commercial excellence model.

In the year 2024, these are the people who have participated in Onenak Bidean:

The employees who have completed the full performance assessment process are: **1,320**, representing **55.3%** of the total workforce (performance assessment are carried out by the commercial network)

[S1-14] Health and safety metrics

LABORAL Kutxa has an Occupational Health and Safety Management System (hereinafter OHS) according to ISO 45001, certified by AENOR. LABORAL Kutxa is a member of the Osarten Joint Prevention Service. In 2024 this certification has been renewed for the next three years. To achieve the objectives defined in the Occupational Health and Safety Policy (OHS), the activities are planned annually in the OHS Management Plan. Within the Management System, among others, there are procedures for hazard identification and risk assessment, accident investigation and health surveillance.

The Health and Safety Committee is a Joint Committee with equal representation, which is also attended by the Director of the People and Media Management Department and the Company Doctor. The Chairman of this Committee is one of the workers' representatives (Prevention Officer). This Committee meets at least once a quarter, and everything discussed in its meetings is recorded in minutes, which are made available to everyone on Giltzanet (intranet). All people are covered by this Committee.

As part of the recruitment process, there is an occupational health and safety training module that explains the organisation of the system, the main risks and preventive behaviours.

In 2024, a two-hour mandatory training for all staff on Occupational Health and Safety was introduced. This basic training module has since been incorporated into the training itinerary for new recruits. Similarly, training on ergonomics, general and specific risks and evacuation plans is provided during risk assessments and regular medical examinations.

Lagun Aro has its own Management System, with procedures similar to those of LABORAL Kutxa for hazard identification and risk assessment, accident investigation and health surveillance covering the entire workforce, with a joint Health and Safety Committee with staff representation.

| Data on occupational accidents by gender ¹ | 2024 | | | 2023 | | |
|--|-------|-------|-------|-------|-------|-------|
| | Men | Women | Total | Men | Women | Total |
| Number of recordable occupational accidents of own workforce | 18 | 15 | 33 | 16 | 18 | 34 |
| Frequency index ² | 5.869 | 1.173 | 3.976 | 1.019 | 1.019 | 2.038 |
| Severity index ^{3 4} | 0.218 | 0.049 | 0.141 | 0.194 | 0.838 | 0.491 |

¹ Information provided to comply with the explicit requirements of Law 11/2018.

² Frequency index: (Number of accidents resulting in sick leave/ Number of hours worked)*10⁶
Number of hours worked: Number of employees* 1,700 h.

³ Severity index: (Number of days lost*100)/Number of hours worked

⁴ The number of days lost is estimated for 2023, this calculation has been obtained via the following estimation:
total hours of absence / 8 hours

| Health and safety metrics | Women | Men |
|---|---------|--------|
| Percentage of own workforce covered by a health and safety management system based on legal requirements and/or recognised standards or guidelines. | 100 % | |
| Number of fatalities in own workforce as a result of work-related injuries and illnesses | 0 | |
| Number of fatalities as a result of work-related injuries and work-related diseases of other workers working on the Entity's premises | 0 | |
| Number of recordable occupational accidents of own workforce. | 18 | 15 |
| Index of recordable occupational accidents of own workforce. | | |
| Frequency index | 5.803 | 1.173 |
| Severity index | 0.277 | 0.051 |
| Number of recordable cases of poor health of employees | 0 | |
| Number of days lost due to work-related injuries and fatalities due to occupational accidents, work-related diseases and deaths due to employee-related illnesses | 540 | 83 |
| Percentage of own workforce that is covered by a health and safety management system based on legal requirements and (or) recognised standards or guidelines and that has been internally audited and (or) audited or certified by an external party. | 100 % | |
| Number of recordable cases of poor health among former own workers | 0 | |
| Number of hours of absenteeism | 150,950 | 67,636 |

[S1-15] Reconciliation metrics

All of Laboral Kutxa's own personnel are entitled to unpaid leave for family reasons as well as leaves of absence for family reasons.

Childbirth and childcare leave (persons who have taken paternity and maternity leave in 2024:

| Childbirth and childcare leave | No. of persons | Percentage of people |
|--------------------------------|----------------|----------------------|
| Female | 22 | 1.7 % |
| Male | 27 | 2.5 % |

[S1-16] Remuneration metrics (pay gap and total remuneration) - general

Gender pay gap, Wage gap

| | 2024 | 2023 |
|-------------|---------|---------|
| Annual Gap* | 12.89 % | 11.84 % |

(*) To calculate the annual pay gap, the average of male pay minus female pay divided by male pay is used. The average gross hourly wage of wage earners is not being calculated, as the CSRD indicates due to not estimating hours worked by type of working day.

Ratio of the total annual remuneration of the highest paid person to the median total annual remuneration of all employees (excluding the highest paid person).

| | |
|-----------------------------|------|
| % Total Annual Remuneration | 4.39 |
|-----------------------------|------|

Methodology: for the calculation of the median, the total remuneration received during the year by each person has been taken without taking into account the number of annual days worked or the percentage of working hours.

[S1-17] Serious human rights incidents, complaints and impacts - general

Existing whistleblowing channels have been described in SBM-2 and S1-3. In 2023 and 2024, 13 communications were received, of which only 3 were accepted and resolved without sanction. No complaints or queries were received in 2023 or 2024 through the channel for Lagun Aro.

In addition, in 2023 and 2024, no labour incidents or grievances or serious human rights-related incidents among the workforce, as well as related fines, sanctions or materiality-related compensation have been detected.

NEIS S2-Employees of the value chain

[SBM-2] Stakeholders' interests and views

This information is described in section NEIS2-SBM2.

[SBM-3] Material impacts, risks and opportunities and their interaction with the strategy and business model

The process for identifying and assessing the impacts, risks and opportunities related to the sub-topic of workers in the value chain was based on an internal and external analysis of the LABORAL Kutxa Group (GLK), where the sub-subtopics that make up the sub-topic of workers in the value chain were analysed: working conditions, equal treatment and opportunities for all and other labour rights; taking into consideration both their own processes and those of the value chain.

In the internal analysis, 12 internal documents of the GLK related to sustainability were assessed. While the external analysis has taken into consideration 5 components: market trends; regulatory analysis; competitor benchmark; experts and analysts, impact on the value chain. As explained above, the process has included stakeholder consultation.

After the assessment of all these elements, it is concluded that none of the sub-topics of the workers in the value chain sub-topic are material for the GLK.

Information required by Law 11/2018

LABORAL Kutxa, aware of the importance of supply chain management in the field of sustainability, is making progress in adapting to the regulations that apply to it and which, among other aspects, aim to manage the risks that may be involved in working with suppliers and outsourcing services. In 2021, the update of the Delegation of Services Policy (also known as the outsourcing policy) was approved. In addition, an organisational unit with the status of a section called Third Party Management was created, which centralises and is responsible for the management of suppliers in order to ensure the application of this Policy. The policy has been further updated and approved in 2024.

In 2023 the Governing Board approved the LABORAL Kutxa Group's Sustainable Procurement Policy. Among other aspects, this policy aims to ensure a dynamic of continuous improvement of the procurement process based on the principles of sustainability, as well as to integrate ESG criteria in decision-making during the selection of our suppliers.

In 2024, in addition to updating the Delegation of Services Policy, the Third Party Management section has continued to analyse more and more supplier companies under the provisions of the aforementioned policies. In this regard, the models used and tools available for communicating with suppliers have been updated. Among those used are:

- Ethics Code of LABORAL Kutxa: which must be signed by suppliers. If any of them do not sign it, they are asked for their code of ethics so that LABORAL Kutxa can validate that it is in line with its standards.
- Supplier Information Request: a tool used for the approval of suppliers. It includes three specific sections on sustainability.
- Characteristics of the Service: focused on the identification of subcontracting or risks, such as the place from which the service is provided, associated with the contracting to be carried out.

These three elements serve to identify and manage supplier risks. Once these documents have been responded to, they are analysed by the departments responsible for the identified risks, which are responsible for verifying and, if necessary, establishing mitigating actions to be able to take on the contract.

All these questionnaires are sent to each supplier upon contracting a new service or renewing an existing one. At the same time, they are being sent to 'old' suppliers, even if the service is not renewed, in order to have as much information as possible on all of said suppliers.

Also, as part of the supplier management project, a channel (e-mail) has been set up for suppliers to contact us to resolve any queries they may have or to report any complaints or concerns.

During 2024, some suppliers have been re-evaluated to bring them in line with new regulatory requirements.

The financial activity that we carry out, as well as our local presence in a very specific territorial area, mean that the risks of managing subcontractors and suppliers are relatively insignificant. During 2023 and 2024 no supplier audits have been carried out.

NEIS S3-Affected communities

[SBM-3] Material impacts, risks and opportunities and their interaction with the strategy and business model

Although LABORAL Kutxa's financial and insurance activity has an impact on society, from the process of analysing material issues, their impacts, risks and opportunities carried out and explained in detail in NEIS2, it can be seen that the sub-subtopics addressed in the sub-topic affected groups are not relevant.

The process to identify and assess the impacts, risks and opportunities related to the sub-topic affected communities was based on an internal and external analysis of the LABORAL Kutxa Group (GLK), where the sub-subtopics that make up the sub-topic affected communities were analysed: economic, social and cultural rights of collectives, civil and political rights of collectives and rights of indigenous peoples; taking into consideration both their own processes and those of the value chain.

In the internal analysis, 12 internal documents of the GLK related to sustainability were assessed. While the external analysis has taken into consideration 5 components: market trends; regulatory analysis; competitor benchmark; experts and analysts, impact on the value chain. As explained above, the process has included stakeholder consultation.

After the assessment of all these elements, it is concluded that none of the sub-subtopics of the affect sub-topic are material for the GLK.

Partnership or sponsorship actions (in compliance with Law 11/2018)

LABORAL Kutxa was founded in the Basque Country as part of a business group with a strong commitment to serving society, whose mission includes the creation of associated and participative work of a cooperative nature, as an essential way of creating wealth and well-being, both among its direct members and in the society in which it is immersed. Therefore, the impacts of the GLK's activity on local populations and on the territory are numerous, the main one being the return to society of part of the profits, in addition to the financing activity itself.

The criteria and mechanisms for the allocation of social assistance are unique:

- Due to its legal nature and its cooperative vocation, LABORAL Kutxa directs a significant part of its humanitarian aid contributions to the promotion of the cooperative world.
- In the distribution of subsidies under one of the headings of the Education and Promotion Fund, the distribution of which corresponds to the institutional bodies of the cooperative, the section known as "General Distribution", one of the organisations that takes part is the Social Council, which is the representative body of the entity's working members.

- In addition, it reserves a specific section for local assistance (Local Distribution), by means of allocations through the branches of LABORAL Kutxa, which steer the aid towards their own areas (neighbourhood associations, nearby educational centres, social action groups, immigrant social assistance centres, etc.).

¿Cómo se reparten los beneficios de LABORAL Kutxa?



The purpose of the Education and Promotion Fund (FEP) is:

- Training and education of the workforce in cooperative principles and values.
- The dissemination of cooperativism, as well as the promotion of inter-cooperative relations.
- The cultural, professional and assistential promotion of the community in general, as well as improving the quality of life and the community development and environmental protection activities.

The purpose of the Intercooperative Social Fund - ISF is, through the Mondragón Foundation:

- Promote business projects and the expansion of cooperatives.

- Among other uses, support for MONDRAGON cooperatives in difficulties, R&D&I projects and training.

| Item (thousands of euros) | 2023 |
|--|---------------|
| Charitable contribution to the launch and consolidation of cooperative companies (through MONDRAGON) | 21,446 |
| Inter-cooperative Social Fund - FSI (15% of Distributable profit) | 21,446 |
| Cooperative Promotion through MONDRAGÓN (68% FEP) | 7,785 |
| Other cooperative initiatives and social values | 140 |
| Entrepreneurship and Business and Employment Training (<i>Gaztenpresa Foundation</i>) | 435 |
| Cultural activities in general and others | 551 |
| Promotion of the Basque-language and Basque Culture | 709 |
| Welfare institutions and developing countries | 607 |
| Agri-food sector | 85 |
| Sports activities | 643 |
| Gender Equality and Empowerment | 134 |
| Environment | 122 |
| Education and Promotion Fund - FEP (10% of Distrib. profit). | 11,213 |
| Sum FSI+FEP | 32,659 |

In 2024, as a result of a Mondragón project to improve the standardisation of the contributions of the different cooperatives, the concepts of the contributions have changed, and now, in addition to the Mondragón Foundation, the following concepts, including sponsorships, have been addressed:

- Sustainable communities:
 - Euskara
 - Health, Well-being and Sport
 - Culture
 - Climate and Biodiversity
 - Gender and Diversity
 - Poverty and Inclusion
- Education and Training
 - Cooperative Training
 - Educational Centres
 - University
- Innovation and New Activities
 - Innovation
 - Entrepreneurship
 - New Activities

- Promotion of Cooperativism
 - Cooperative Promotion
 - Mondragón Institutions
 - Cooperative Institutions
 - Internationalisation
 - Dimensioning and Diversification
 - Cooperative Solidarity

| Item (thousands of euros) | 2024 |
|--|---------------|
| Charitable contribution to the launch and consolidation of cooperative companies (through MONDRAGON) | 21,446 |
| Inter-cooperative Social Fund - FSI (15% of Distributable profit) | 21,446 |
| Cooperative Promotion through MONDRAGON (68% FEP) | 9,175 |
| Sustainable communities | 3,518 |
| Education and Training | 137 |
| Innovation and new activities | 439 |
| Promotion of cooperativism | 216 |
| Education and Promotion Fund - FEP (10% of Distrib. profit). | 14,297 |
| Sum FSI+FEP | 35,743 |

| | 2024 | 2023 |
|--|--------|--------|
| Contribution. Funds (FEP and FSI) (thousand €) | 35,743 | 32,659 |

All of these contributions, sponsorships and partnerships strengthen relations and dialogue with local community actors.

With regard to the Impact of the company's activity on employment and local development, the activity of the Gaztenpresa Foundation stands out. The Gaztenpresa Foundation is a private, non-profit organisation. It is part of LABORAL Kutxa's social work and its purpose is to support the people in our area that would like to learn so that they can have more chance of success, generating wealth through the creation of employment.

The Gaztenpresa Foundation is financed by LABORAL Kutxa and Mondragón Corporation, and on the other hand by the Basque Government (Dept. of Employment and Labour) through Lanbide.

| | 2024 | 2023 |
|-------------------------------|------|------|
| Gaztenpresa jobs created | 696 | 634 |
| Gaztenpresa companies created | 348 | 320 |

Tax information

This information is broken down as required by Law 11/2018 (not covered by NEIS)

LABORAL Kutxa exercises its tax obligations in the territories in which it carries out its activity, specifically in the four foral territories and in common territory, thus contributing to the support of public services and the progress of Society.

Profits obtained by country:

| | 2023 | 2024 |
|----------------------------|-----------------------|-----------------------|
| Luxembourg (Lamiak) | -338,814.09 | 1,270,080.92 |
| Spain | 208,443,969.66 | 254,056,283.70 |
| Consolidated result | 208,782,783.75 | 255,326,364.62 |

Taxes on profits paid (accrual basis, all in Spain):

| | 2023 | 2024 |
|---|-----------------------|-----------------------|
| LABORAL Kutxa | €25,948,260.27 | €43,004,934.42 |
| Seguros Lagun Aro Vida, S.A. | €2,885,626.26 | €1,138,017.22 |
| Seguros Lagun Aro, S.A. | €1,686,236.31 | €345,957.40 |
| Caja Laboral Gestión SGIIC, S.A. | €3,068,454.48 | €4,015,923.38 |
| Caja Laboral Pensiones GFP, S.A. | €49,067.43 | €55,518.96 |
| ISGA Inmuebles, S.A. | €238,074.97 | €687,596.38 |
| Caja Laboral Bancaseguros (CLBS) O.B.S.V., S.L.U. | €662,530.57 | €448,801.76 |
| TOTAL | €34,538,250.29 | €49,696,749.52 |

Public subsidies received:

| | 2023 | 2024 |
|---------------|---------|-----------|
| LABORAL Kutxa | 275,000 | 63,171.83 |
| Lagun Aro | - | 75,833.54 |
| Lagun Klik | - | 21,554.99 |

NEIS S4-Consumers and end-users

[SBM-2] Stakeholders' interests and views

This information is described in section NEIS2-SBM2.

[SBM-3] Material impacts, risks and opportunities and their interaction with the strategy and business model

This disclosure requirement shall, on the one hand, indicate which impacts, risks and opportunities (IROs) related to consumers and end-users have been identified in the dual materiality assessment process. On the other hand, specific responses will be given to the issues raised in the regulations.

In terms of IROs, of the 3 sub-topics that make up the consumer and end-user sub-topic, impacts and opportunities have been detected in two of them: Incidents related to information for consumers/end-users and Social inclusion of consumers/end-users. Specifically:

| Sub-topic | Impact | Opportunity |
|--|---|--|
| Incidents related to information destined to consumers or end-users. | Unclear explanations provided to customers, concealment of information or sale of unsuitable products. Clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. | Customer loyalty by providing clear, precise and transparent explanations of financial products, their conditions and the costs involved. Achievement of a good reputation in society and in the sector for providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. Legal certainty by providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. |
| Social inclusion of consumers or end-users. | Catering to the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or any other aspect. | Customer loyalty and retention by meeting their needs regardless of their gender, origin, race, sexual orientation or any other aspect. Gaining more customers by serving their needs regardless of gender, origin, race, age, sexual orientation or any other aspect. |

Having mentioned the impacts and opportunities related to consumers and end-users, the following will highlight the aspects of its strategy and business model that are related and can influence them.

To this end, it is essential to mention the Zentzua project (“meaning” in Basque), which is a strategic reflection carried out between 2022 and 2023 to redefine the purpose and legacy, mission and values of the Entity. In other words, the fundamental pillars that will serve to govern the Entity’s strategy and business model in the coming years. Within it, the section on consumers and end-users (referred to as “customers”) has significant presence.

On the mission, the following is specified: *“LABORAL Kutxa and the people who form part of the credit cooperative are committed to offering our customers a close, professional and honest financial and insurance service that helps them to achieve their goals and well-being”*.

As far as values are concerned, some of them also mention the section on customers:

- Honesty

We act with respect towards others in our internal relationships, with our customers and the environment of which we are a part. We build interpersonal relationships based on:

- Transparency.
- Trust.
- Mutual respect.
- Justice.
- Ethical and consistent behaviour.

- Closeness

We believe in the importance of closeness as a basis for building strong and lasting relationships at all levels.

- It allows us to remain connected internally.
- We want to create a banking system that is close to our customers.
- Rooted and involved in the territory.

- Professionalism

We believe in education as a way to positively prepare people to face personal, business and social challenges and to achieve:

- Effective professionals who are constantly developing
- Trust and credibility

- Exercising responsibility in co-ownership.
- Professionally advising customers in conscious decision-making.

Zentzua also has three sections, which are people, customers and society. On the customer section, these are the points mentioned in it:

- We wish to extend our financial and insurance service model to society as a whole:

We are an entity open to the entire society. We wish to extend our financial and insurance services to all those individuals, businesses and companies that may need them in the communities in which we are present. We strive to expand our customer base because we understand that with our products, services and professionalism, as well as our values in dealing with them, we can bring special value to the market.
- We encourage a close, professional and honest long-term relationship:

These are the behaviours we will promote in our relationships, on the basis of which we want to accompany our private and corporate customers throughout their lives, helping them to achieve their goals. We will advise them in an educational manner, so that they may have the necessary criteria for an adequate financial, life and property insurance planning.
- Full availability and accessibility:

We will develop a service whose aim is to make our customers feel that we are always on hand. For this reason:
 - We will provide an adequate network of branches and business hours that will allow us to offer a professional and personalised service.
 - Considering that our customers may require our services at any time and in any place, we are committed to responding to their needs through a combination of physical and digital channels, with automated and personalised services.
 - We will promote stability in our managers' relationships with customers.
 - Our service model will not discriminate against customers for any reason whatsoever.
 - We will have a comprehensive accessibility policy that will pay special attention to groups considered disabled and vulnerable.
 - We will apply policies and resources to provide our service in the language of the customer's choice, while promoting the Basque language in particular in our relations.

- We will foster a people-based relationship, offering a hybrid service of the highest quality:

We aim to combine digitisation with a professional and personal approach, always promoting the latter, even in a digitised environment. Thus, with our digital value proposition we aim to offer our customers agility, competitiveness and operational simplicity; and through the professionals at our branches, physical and emotional proximity, a greater level of personalisation of the service, as well as facilitating accessibility to banking services for groups with lower levels of digital skills.

We want to continue to be the market leader in terms of the quality of face-to-face and digital service.

- Product and price range that is appropriate for the customer:

We will develop a competitive range of products and services, innovating with a customer-focused approach, always with the aim of marketing those that are appropriate to the profile, needs and expectations of each of our customers.

Our product pricing policies and business profitability criteria will incorporate a reasonable balance between delivering value, risk and return.

Finally, the Zentzua project also specifies the actions to be undertaken. In the customer area, the following is detailed *“Develop a guide or similar of the main behaviours in relation to customers and a system for monitoring this, with customer evaluations”*.

As can be seen, all these specifications mentioned above are related to repairing negative impacts and incidences and enhancing the positive impacts and opportunities detected in the dual materiality process.

Once the IROs and their relationship with the Entity’s strategy and business model have been described, the other issues required by the regulations will be addressed:

In the dual materiality process, the Entity has taken into account all consumers and end-users who may be affected by the company. However, for the stakeholder consultations, only the most closely involved stakeholders have been taken into account.

Within the options specified in the standards, the Entity considers that material incidents relate to the following:

- Consumers or end-users of services who may adversely affect their rights to privacy, protection of their personal data, freedom of expression and non-discrimination.
- Consumers or end-users who rely on accurate and accessible information related to products or services, such as product manuals and labels, to avoid potentially harmful use of a product or service.

Also, on the negative incidents, it is considered that they could be generalised incidents.

On the activities giving rise to the positive findings, they are described below in sub-section “S4 – 4”

Regarding the main types of consumers or end-users that are affected within the sub-topic of social inclusion of consumers or end-users, two main types of customers were identified in the diagnosis carried out with Ilunion. On the one hand, customers with some kind of disability, whether physical or cognitive, who may have problems maintaining an appropriate relationship with LABORAL Kutxa through any of its channels, both physical (branch or ATMs) and digital (website or app). In addition, older people who may have difficulties, in many cases similar to those of people with disabilities, were taken into account and participated in the diagnosis.

[S4-1] [MDR-P] Policies related to end-users and end-consumers

Given its activity (financial services and insurance) and scope of action (Spain), the GLK has no established commitments on human rights policies for consumers or end-users. For the same reasons, possible incidents related to the respect of the human rights of consumers or end-users are not covered. Similarly, no significant impacts or risks have been identified in the materiality analysis. S4-3, Processes for remedying negative impacts and channels for consumers and end-users to raise concerns, explains the mechanisms available for engagement with consumers or end-users, which would include measures to provide or enable redress for human rights impacts, if any. No cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises Involving Consumers or End-Users are identified.

In this section, reference will be made to the Entity’s existing policies related to the two consumer and end-user sub-subtopics that have been found to be material in the dual materiality analysis. In addition, the regulations that the Entity complies with in this respect will also be mentioned, as they could play the role of policies:

Sub-subtopic: Incidents related to information destined to consumers or end-users.

- Affected IROs:
 - Unclear explanations provided to customers, concealment of information or sale of unsuitable products. (Positive impact)
 - Clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. (Negative impact)

- Customer loyalty by providing clear, precise and transparent explanations of financial products, their conditions and the costs involved. (Opportunity)
- Achievement of a good reputation in society and in the sector for providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. (Opportunity)
- Legal certainty by providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. (Opportunity)
- Policies:
 - Policy and procedure for training and accreditation of persons who grant, design, report on or market credit agreements for residential real estate with customers or potential customers.
 - The purpose of this Policy is to establish criteria on the knowledge and skills required of LABORAL Kutxa personnel involved in the design, marketing process, granting, management and fulfilment of real estate loan contracts for customers or potential customers (hereinafter, these personnel shall also be identified as “affected personnel”), as well as on the way in which said knowledge and competences must be assessed and accredited, in compliance with the provisions of Royal Decree 309/2019 and Order ECE/482/2019 of the Ministry of Economy, both published in the BOE of 29 April 2019.
 - Policy and procedure for the training and assessment of persons who inform or advise customers or potential customers.
 - The purpose of this Policy is to establish criteria on the knowledge and skills that LABORAL Kutxa personnel who provide information and/or advise customers or potential customers on behalf of the Entity (hereinafter, such personnel shall also be identified as “**Relevant Personnel**”), as well as on the way in which such knowledge and skills should be assessed and accredited, in compliance with the provisions of the CNMV’s Technical Guide 4/2017. There are no human rights policy commitments for consumers or end-users.

This Policy shall also set out criteria for the knowledge and skills of persons who, while not providing direct marketing and/or investment advice to customers, are involved in product development, documentation or advice to the persons referred to in the preceding paragraph in the following Areas: Business Development Area, Finance Area, Media Area, Risk Area and Social Management Department (hereinafter, this personnel shall also be referred to as **“Other Personnel”**).

- Regulations:
 - Article 3 of RD 565/2017/EU, conditions applicable to the provision of information and articles 44 to 52 related to customer information.
 - Article 200 of Law 6/2023, general duty of information to customers to which institutions are subject.
 - Articles 143 and 144 of RD 813/2023, on the general duty of information and electronic format.
 - Article 4.9 of Royal Decree 1082/2012, of 13 June, on CIIIs.
 - Regulation (EU) 2019/2088, on sustainability disclosures in the financial services sector.
 - Law 35/2003, of 4 November, on Collective Investment Institutions and Royal Decree 816/2023, of 8 November, implementing it.
 - Rule 7 of Circular 4/2008, on quarterly, half-yearly and annual reporting of CIIIs.
 - CNMV Communication of 23 January 2015 on transparency measures in the marketing of CIIIs.
 - Law 5/2021, of 12 April, on capital companies.
 - Circular 7/2011, of 12 December, on tariff prospectus and content of standard contracts.
 - Articles 5, 6 and 9 of Order EHA/1665/2010, 11 June, on the legal regime for investment services firms with regard to tariffs and standard contracts. - Communication from the CNMV on the adaptation of standard contracts to the provisions of Royal Decree 217/2008, of 15 February.
 - Communication from the CNMV on the adaptation of Standard Contracts to the provisions of Royal Decree 217/2008, of 15 February.
 - Order EHA/2899/2011, of 28 October, on transparency and customer protection in banking services.

- Royal Decree-Law 19/2017, of 24 November, on basic payment accounts, transfer of payment accounts and comparability of fees. (Official State Gazette of 25 November).
- Royal Decree-Law 1/2017, of 20 January, on urgent measures for the protection of consumers with regard to floor clauses.
- Order EHA/2899/2011, of 28 October, of the Ministry of Economy and Finance (B.O.E. of 29 October), on transparency and customer protection in banking services.
- Bank of Spain Circular 5/2012, of 27 June (B.O.E. of 6 July), to credit institutions and payment service providers, on transparency of banking services and responsibility in the granting of loans.

Sub-subtopic: Social inclusion of consumers or end-users.

- Affected IROs:
 - Catering to the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or any other aspect. (Positive impact)
 - Customer loyalty and retention by meeting their needs regardless of their gender, origin, race, sexual orientation or any other aspect. (Opportunity)
 - Gaining more customers by serving their needs regardless of gender, origin, race, age, sexual orientation or any other aspect. (Opportunity)
- Policies.
 - There are no specific policies for this sub-subtopic.
- Regulations:
 - Accessibility Directive 2019/882, with the aim of making products and services provided in the EU more accessible to people with disabilities.
 - Law 11/2023, on the transposition of European Union Directives on accessibility.
 - Royal Decree-Law 19/2017, of 24 November, on basic payment accounts, transfer of payment accounts and comparability of fees. (Official State Gazette of 25 November).

[S4-2] Processes to involve end-users and end-consumers in the impacts

The following will disclose how the Entity collaborates with consumers and end-users in relation to the material impacts or incidences detected in the dual materiality process.

The starting point will be each of the two impacts detected in the dual materiality process. It then explains how the Entity responds to these impacts.

Incidents related to information destined to consumers or end-users.

The Entity has defined a process for listening to customers (explained in section SBM2), but has not defined a process for involving customers and users. The head of the planning, business research and governance section within the business development area is responsible for the listening process.

Catering to the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or any other aspect. (Positive impact):

S4 SBM2 explains the process that was carried out in 2023 to carry out the comprehensive accessibility diagnosis. The opinion and assessment of people with disabilities (visual, physical and hearing) and old age were taken into account. Their opinion and assessment, together with the criteria of expert consultants, served as a basis for identifying areas for improvement and proposing solutions. The sustainability coordinator within the planning department is responsible for this project.

The proposed actions aimed to ensure an interconnected network of channels covering diversity and guaranteeing access to accessible, personalised and optimised information, based on preferences and needs, leading to accessible, efficient and effective processes, so that users and/or customers can achieve their objectives while interacting with the Entity and defining their experience with it.

The different LABORAL Kutxa departments involved analysed and prioritised the actions proposed by Ilunion according to their importance and feasibility.

[S4-3] Processes to remedy negative impacts and channels for consumers and end-users to raise concerns

Laboral Kutxa has a Customer Care Service as legally mandated by Law 44/2002, of 22 November, on Financial System Reform Measures, in particular:

Article 29. Customer Service Department and Customer Ombudsman. One. Credit institutions, insurance companies and investment services companies shall be obliged to attend to and resolve any complaints and claims that users of financial services may submit, related to their legally recognised interests and rights. To this end, institutions must have a customer service department or service responsible for dealing with and resolving complaints and claims. These entities may, either individually or grouped by branch of activity, geographical proximity, business volume or any other criterion, appoint a Customer Ombudsman, who must be an independent entity or expert of recognised prestige, and who will be responsible for dealing with and resolving the types of complaints submitted to the former's decision within the framework of the provisions of its operating regulations, as well as promoting compliance with the regulations on transparency and customer protection and good financial practices and uses. Two. The Customer Ombudsman's decision in favour of the complaint will bind the institution. This binding shall not preclude full judicial protection, recourse to other dispute settlement mechanisms or administrative protection.

In development of the aforementioned legal precept, the Governing Board approved the Regulations for the defence of customers, published on the website and available to the general public, with direct access on the home page of the website, Customer Service section.

The consumer or end-user has several channels available to access the Service:

- An e-mail address:
- servicio.de.atencion.al.cliente@laboralkutxa.com
- They may submit their complaint or claim directly via their online bank with direct receipt in the mailbox
- At all branches of the commercial network with forms available to the customer
- By ordinary mail

Although the main function is to resolve complaints and claims based on the regulations on banking transparency and good banking practices, submitted by both customers and non-customer users who have contacted the institution, and complying with the provisions of the “Guide on the criteria for the organisation and operation of the customer care services of institutions supervised by the Bank of Spain”, in relation to the monitoring of complaints and claims, with a second line of defence and risk approach:

(...) 6.4. Follow-up and control of complaints and claims

6.4.1. The scope of the complaints and claims assessment process should cover all complaints and claims processed within the institution, regardless of the body that has resolved them.

6.4.2. On the other hand, it is also desirable that, as a result of the analysis, not only the directly affected entity's procedures are corrected so that the detected incidents do not recur, but also to investigate whether such root causes could in turn affect other processes or products, including those for which no direct complaints or claims have been received. (...)

As a result of this analysis, if applicable, a communication is initiated from the Service itself to the areas and departments of the entity, which may be for the purpose of issuing a recommendation or informing of a potential incident.

The non-formal procedure, in fact, starts with direct communication, including to the Regulatory Compliance or, where appropriate, Audit and Legal departments.

And, as a follow-up task once the control procedure has been initiated, the recommendation for compliance control is issued in the same form of communication:

And as a mechanism so that the customer can finally access the Customer Care Service, and can communicate their complaint or claim, there are direct instructions to other customer contact sites with the entity, such as “contact with” and TELEBANKA, so that any incident reported in these spaces reaches our Service, and is not left unanswered or referred for resubmission.

The protection of customer data is guaranteed within the scope of the Entity's Data Protection Policy, and the customer is informed of this in the various forms for accessing the Service.

Customer service (requirement of Law 11/2018):

This Service responds to queries, complaints and claims submitted to it by customers through the various channels set up for this purpose, applicable to Caja Laboral Popular Coop. de Crédito, Caja Laboral Gestión, S.G.I.I.C., S.A. and Caja Laboral Pensiones, G.F.P., S.A.

The official response period is 2 months from receipt of the letter, 1 month if the claimant is a consumer, except in the case of claims relating to payment services, which must be resolved within fifteen business days of receipt, although the Entity is committed to dealing with these matters with the utmost diligence, without exhausting the aforementioned periods.

A total of 52,241 cases were filed in 2024 (24,167 in 2023), of which 47,400 (22,658 in 2023) were admitted for processing and a response was provided. 4,511 cases were not admitted for processing (1,509 in 2023), for the various reasons set out in the Customer Service Regulations as causes for rejection of complaints or claims submitted for processing, leaving 330 cases pending admission at 31 December 2024.

| | 2024 | 2023 |
|--|---------------|---------------|
| No. of case files opened | | |
| - In writing: prospectus / letter | 44,347 | 18,978 |
| - Internet | 7,226 | 4,476 |
| - By telephone | 0 | 1 |
| - Public bodies: OMIC / Autonomous Governments | 668 | 712 |
| | 52,241 | 24,167 |
| No. of case files admitted for processing | 47,400 | 22,658 |
| Nature of the Files | | |
| - Complaints | 2,133* | 3,328 |
| - Claims | 49,646 | 20,722 |
| - Queries | 79 | 11 |
| - Suggestions | 42 | 1 |
| - Letters of congratulation / gratitude | 6 | 4 |
| - Sundry petitions | 335 | 100 |
| - Others | 0 | 1 |
| | 52,241 | 24,167 |

- Some filters are applied to the initial register of complaints in order to obtain the final number of files of this nature. This is due to the fact that, in some complaints, mainly regarding mortgage clauses, as there is no information that we can include in the mandatory fields required by the application, they are registered as complaints, as it allows the registration, with the main data.
- This is due to the fact that some claims are about loans from the defunct IPAR KUTXA entity, whose coding data are not recognised or are not held in Laboral Kutxa's databases.
- Once we have obtained the data from the application in Excel format with which the information to be reported is managed, taking into account the coding of the complaint, we can compute it by its true nature of complaint, reducing the number of complaints from 4,336 to 2,133, which are really by nature.

| | 2024 | 2023 |
|---|---------------|--------------|
| Amounts claimed | | |
| - Amounts relating to cases for which the decision favoured the Entity: | 1,239 | 2,935 |
| - Amounts relating to cases for which the decision favoured the Customer: | 21,370 | 5,374 |
| . Amounts indemnified by the Entity | 21,370 | 5,374 |
| | 22,609 | 8,309 |

| Lagun Aro | 2023 | 2024 |
|------------------------------------|-------------|-------------|
| Open cases (claims and complaints) | 941 | 1,140 |
| Cases upheld or partially upheld | 403 | 490 |
| | | |
| CLBS | 2023 | 2024 |
| Open cases (claims and complaints) | 1 | 4 |
| Cases upheld or partially upheld | 1 | 0 |

[S4-4] [MDR-A] Actions related to end consumers

This section will mention the actions being carried out in each of the two consumer and end-user sub-subtopics that have been found to be material in the dual materiality analysis. No serious human rights issues and cases related to consumers or end-users have been reported. Given the diversity of areas of the organisation that implement actions to manage these two relatively important sub-subtopics, there is no quantification of the resources allocated (capex and opex) to address them, nor an analysis of results.

Sub-subtopic: Incidents related to information destined to consumers or end-users.

- Affected IROs:
 - Unclear explanations provided to customers, concealment of information or sale of unsuitable products. (Positive impact)
 - Clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. (Negative impact)
 - Customer loyalty by providing clear, precise and transparent explanations of financial products, their conditions and the costs involved. (Opportunity)
 - Achievement of a good reputation in society and in the sector for providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. (Opportunity)
 - Legal certainty by providing clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved. (Opportunity)

The actions adapted, all on a permanent basis, are:

- Presentation of the following information to customers through the Information Prospectus on Caja Laboral Popular Coop. de Crédito and its investment services, in a transparent manner and prior to any procurement:
 - General information about the entity.

- Investment and/or ancillary services
- MiFID customer assessment (suitability and appropriateness)
- Policies related to investment services:
 - Sustainability risk integration policy
 - LABORAL Kutxa's Order Execution and Management Policy
 - LABORAL Kutxa's Asset Safeguarding Policy
 - LABORAL Kutxa's conflict of interest policy
 - LABORAL Kutxa's Incentive Policy
 - Policy on Recording Communications and Conversations with customers
 - Tariff Brochure
 - LABORAL Kutxa's Customer Service Department, where customers can submit their complaints and claims
 - Deposit Guarantee Fund
- The following information is made available to customers:
 - Access to tariff prospectuses.
 - Provision of legal pre-contractual information on the products that are the subject of a recommendation and/or contract.
 - Provision of post-contractual product information: costs and expenses, statements of transactions and positions, tax information, annual performance report, etc.
 - Provision of regular information on investment and market developments.
 - Access to positions, documents, contracts, correspondence, etc. via online banking at any time and free of charge.
- Review of product and service contracts by the Legal Department.
- Annual checks by the Regulatory Compliance department to verify whether processes are being carried out in accordance with the regulations. In the event of incidents, corrective measures are requested. Recommendations are also issued in these controls.
- Monitoring by the Product Committee for the correct marketing of products (that they are marketed to the target audience, assessment of possible reputational, cyber, operational risks...).

- MiFID training required for the commercial network (30 hours per year) for the correct performance of their functions.
- Review by Self-control of all commercial communications for truthful, legal, honest and fair advertising.
- Inform all customers who have taken out a personal loan (regardless of the channel used, whether physical or digital) that they have 15 days to withdraw from the contracted financing, without penalty.
- In mortgage lending, deliver price offers to customers always in the format called "European Standardised Information Sheet - ESIS". Where the common practice is to provide information in a "simulation" or "advertisement" format, which makes it impossible to compare the different offers of the entities in a homogeneous manner.

Sub-subtopic: Social inclusion of consumers or end-users.

- Affected IROs:
 - Catering to the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or any other aspect. (Positive impact)
 - Customer loyalty and retention by meeting their needs regardless of their gender, origin, race, sexual orientation or any other aspect. (Opportunity)
 - Gaining more customers by serving their needs regardless of gender, origin, race, age, sexual orientation or any other aspect. (Opportunity)
- Comprehensive accessibility plan, including:
 - Accessibility training for the people in the Central Services teams directly involved in implementing accessibility measures.
 - Installation of a software tool to validate the accessibility of web pages.
 - Incorporation of new functionalities in ATMs to facilitate accessibility.
 - Incorporation into the new physical branch model of recommendations such as the magnetic loop at the counter, accessible rest furniture or glass signage.
- Availability of a Basic Payment Account for those with difficulties in accessing financial services.

[S4-5] MDR-T. Objectives related to end-consumers

LABORAL Kutxa has established the following goals related to end users and consumers. For objectives 2 and 3, we have collaborated with Ilunion as the end-user representative.

Goal 1

- Training of all staff marketing investment and mortgage products. Better technical, legal and commercial training helps to minimise the risks of inappropriate advice or marketing of products unsuited to the customer profile.
- Identification with impact, risk and opportunity: Clear, precise and transparent explanations to customers about financial products, their conditions and the costs involved.
- It identifies and addresses sustainability issues relating to impacts related to information for consumers or end-users.
- As there is no policy on this IRO, there is no relationship to one.
- This is a relative target (percentage of marketing staff with completed and updated training).
- It is an objective required by MiFID and LCCI legislation
- The objective is to ensure that the staff that advises on investments and markets mortgages have the basic and annually updated training required by the LCCI and MiFID regulations, thus guaranteeing high levels of knowledge of the products, risks and legal obligations.
- It is established as the percentage of the affected workforce that has completed and updated mandatory training annually by 31 December.
- The minimum annual hours, as well as the content to be covered, are established by the two regulations.
- The results as at 31/12/2024 were as follows:
 - MiFID: 97 %
 - LCCI: 98 %

This is considered a positive result given that, although the objective is for 100% of the workforce to take the training, the number of people who do not meet the requirement is within a reasonable margin, taking into account personal circumstances (sick leave, leave of absence, etc.) or work-related circumstances (recent incorporation, changes of post, etc.).

Goal 2

- Training the staff of the commercial network in management for people with disabilities
- It addresses the impact of meeting the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or other aspect.
- Related to the action of the comprehensive accessibility plan.
- There is no accessibility policy
- The training aims to provide the staff of the branch network with tools and resources to care for people with disabilities and the elderly, taking into account their needs and particularities.
- It is an absolute objective to launch in 2025 training designed to be carried out by the commercial network staff.
- This training is designed by Ilunion, a consultancy firm of the ONCE Group, made up of people with disabilities.

Goal 3

- Update of the comprehensive accessibility plan.
- It addresses the impact of meeting the needs of any type of customer, regardless of gender, origin, race, age, sexual orientation or other aspect. It is specifically aimed at facilitating accessibility to all LABORAL Kutxa's communication channels with society and customers with some kind of disability and also for the elderly.
- Related to the action of the comprehensive accessibility plan.
- There is no accessibility policy.
- Almost three years after the initial diagnosis and the implementation of improvement actions, a twofold objective is being pursued:
 - Review the progress made and analyse the level of development achieved with respect to the first diagnosis carried out in 2023.
 - To propose new possible lines of action.
- The update, alike the initial diagnosis, will be carried out by Ilunion. Ilunion is an accessibility consultancy firm, part of the ONCE Group, and formed in part by people with disabilities.

INFORMATION ON GOVERNANCE

NEIS G1-Business conduct

[GOV-1] Role of administrative, managerial and supervisory bodies

This information is described in section NEIS2-GOV1.

[IRO-1] Description of the processes for identifying and assessing material impacts, risks and opportunities

This information is described in section NEIS2-IRO1.

[G1-1] Business conduct policies and corporate culture

- CODE OF ETHICS AND BUSINESS CONDUCT (hereinafter referred to as the Code of Ethics):
 - It responds to the Entity's commitment to professional, transparent, honest and upright conduct in the entities that make up its Group, and therefore sets out the principles of action and rules of conduct that should guide the commitment of employees (including senior management) and directors with the aim of maintaining appropriate relations with stakeholders (customers, suppliers and society).

The scope of application of the Code of Ethics and Professional Conduct extends to employees and administrators, promoting awareness of it among third parties who have dealings with the entities that make up the Laboral Kutxa Group so that the conduct of all of them is aligned with the same principles of action and rules of conduct, thus guaranteeing consistency with the values included in the Code of Ethics.

The values and principles of action of the Code are transferred to the suppliers of the Laboral Kutxa Group through the Code of Conduct, which defines the fundamental behaviour and principles that they must respect and undertake to comply with.

The Governing Board of Laboral Kutxa is ultimately responsible for ensuring compliance with the Code of Ethics, having appointed an Ethics Committee to ensure that the values, principles of action and rules of conduct set out in the Code are applied.

The Code of Ethics is published on the Entity's intranet, information notices are issued when modifications of particular relevance are made to its content, and annual training is provided in relation to its content or the prevention of the Entity's criminal liability.

The identification and notification mechanism is mainly carried out through the whistleblowing channel, which is configured as a link available on the corporate website and of open access to any person (whether directly concerned or not) and which guarantees the confidentiality and anonymity of all communications submitted and is managed by the Ethics Committee.

As complementary identification and notification mechanisms (which do not guarantee complete anonymity), there is an e-mail address through which the Ethics Committee can be contacted directly, and ultimately any member of the Committee can be contacted in person.

Regarding mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour contrary to the Code of Ethics:

1. There is a Code of Ethics and Professional Conduct which sets out the principles of action and standards of conduct to be followed by employees and managers.
2. There is an organisational and management model that regulates procedures, measures and controls to prevent criminal conduct.
3. There is a mechanism for identifying and reporting potential misconduct or conduct contrary to the Code of Conduct that is confidential, anonymous and allows for both written and verbal submissions.
4. There is a control body that supervises the existing organisational and management model in order to prevent criminal behaviour or behaviour contrary to the Code of Ethics.
5. The organisational and management model includes a written procedure that determines the steps to be followed in the event of receiving a report of criminal behaviour or behaviour contrary to the Code.

The investigation mechanism is regulated in the Crime Prevention and Response Manual, in the Policy governing the IIS and its development procedure. The phases of the investigation include:

- a) Sending confirmation that the communication has been received.
- b) Drafting of an initial assessment report proposing whether or not to admit the application for processing.
- c) Sending the communication of whether it has been admitted for processing or not.
- d) Investigation report and conclusions, proposing the opening or not of disciplinary proceedings and/or the adoption of additional measures.
- e) Communication of the proposal to the Directorate General.

- f) Informing that the processing of the communication has been completed.

On the home page of the corporate website there is a URL link under the heading “Whistleblowing Channel” which can be accessed through the EQS Integrity Line tool, offered in software as a service (SaaS) mode by the specialised service provider EQS GROUP REGTECH SLU, CIF B02662096, Calle Villanueva 31, 28001, Madrid.

The Ethics Committee’s annual Action Plan includes training activities related to the prevention of criminal risks, including regular training on the Code of Ethics and Professional Conduct.

There is no identification of the positions within the company that are most at risk of corruption and bribery.

- Affected sub-subtopics:
 - Corruption and bribery.
- Affected IROs:
 - Training of staff to avoid any scenarios of corruption or money laundering. (Positive impact)
 - Carrying out cases of corruption or money laundering through the Entity’s channels or products. (Negative impact)
 - Possible sanctions for failure to prevent scenarios of corruption or money laundering. (Risk)
 - Bad reputation for LABORAL Kutxa because it is perceived as an institution that is not safe from cases of corruption or money laundering. (Risk)
 - Promotion of a good reputation for LABORAL Kutxa for being perceived as an entity with ethical values and socially committed to eradicating behaviours such as corruption or money laundering. (Opportunity).

[G1-2] Supplier relationship management

Information on this sub-subtopic is not disclosed as it is not material, as indicated in disclosure requirement G1-IRO1.

[G1-3] Preventing and detecting corruption or bribery

The policies and procedures that make up the crime prevention and response system (which include the crimes of Business Corruption, Bribery and Influence Peddling) are published on the Entity’s intranet, and information notices are issued when modifications of particular relevance are made to their content.

In addition, the Ethics Committee's annual Action Plan includes training activities related to the prevention of criminal risks.

On the procedures in place to prevent, detect and deal with allegations or incidents of corruption and bribery:

1. As a prevention mechanism, there is a Code of Ethics and Professional Conduct and a Criminal Compliance Policy that regulates the expected behaviour of the organisation (including a specific section on anti-corruption in the Code of Ethics and on the crimes of Corruption in Business, Bribery and Influence Peddling in the Criminal Compliance Policy), as well as a communication and training plan that conveys these contents.
2. A Whistleblower Channel is available as the main detection mechanism.
3. As an investigation mechanism, the Crime Prevention and Response Manual regulates the steps and procedures to be followed in the investigation of any communication received by the Ethics Committee.

The Ethics Committee conducts the investigation, assisted by the Regulatory Compliance department to ensure independence and objectivity in the processing, whose evaluation report includes whether any conflict of interest has been detected between the area involved in the matter and any participant in the investigation

The Chairman of the Ethics Committee informs the General Management of the conclusions of the investigation report and the Regulatory Compliance Department includes the most relevant aspects of the Ethics Committee's actions in its quarterly reporting to the Audit and Regulatory Compliance Committee and to the Board of Directors on a half-yearly basis.

A Whistleblower Channel training has been convened in 2024, which includes communications on corruption and bribery cases. All employees (100% of the staff) have been invited to this training, which does not have an established periodicity, but is carried out when the Ethics Committee considers it necessary. Type of Training: Online course with final exam. Training completed by 2,065 people (86.5%).

In 2024 the Risk Management, Compliance and Internal Audit functions were included in the 2024 training referred to in the previous section.

The Board of Directors was included in the 2024 training referred to in the previous section.

[G1-4] Incidents of corruption or bribery

In 2023 and 2024 there have been no incidents, fines or convictions for corruption or bribery.

There have been no confirmed incidents of contracts with business partners being terminated or not renewed due to corruption or bribery-related violations.

In the years 2023 and 2024, 13 communications were received via the whistleblowing channel, of which only 3 were accepted and resolved without sanction. The figures and the resolution of each type of complaint admitted for processing by channel are detailed below:

Table of Complaints Received and Resolution

| Whistleblowing Channel | Type of Complaint | Quantity | Resolution |
|---|-------------------|----------|------------|
| WEB complaints channel | Harassment | - | - |
| | Human rights | 3 | 3 |
| | Corruption | - | - |
| | Others | - | - |
| WEB complaints channel (Seg, Lagun Aro) | Harassment | - | - |
| | Human rights | - | - |
| | Corruption | - | - |
| | Others | - | - |

Other Information on Confirmed Incidents

As described above, in 2023 and 2024 there have been no incidents, fines or convictions of corruption or bribery, so in terms of incidents related to corruption or bribery, in the last two years:

- No workers were dismissed or sanctioned for incidents related to corruption or bribery.
- No contracts with business partners were terminated or not renewed due to violations related to corruption or bribery.

[G1-5] Political influence and lobbying activities

No information is disclosed for this sub-subtopic as the issue 'political influence and lobbying' is not material as indicated in disclosure requirement G1-IRO1.

[G1-6] Payment practices

No disclosures are made on this sub-subtopic as the issue 'supplier relationship management, including payment practices' is not material as indicated in disclosure requirement G1-IRO1.

Information relating to the fight against corruption and bribery

Contributions made to foundations and non-profit organisations (in response to Law 11/2018)

As explained in section S3 Partnership or sponsorship actions, LABORAL Kutxa returns 25% of its distributable profits to society. Of this distribution, most (21.8%) goes to the Mondragón Foundation.

The MONDRAGON FOUNDATION is a fund management entity with which it carries out educational activities, promoting inter-cooperation in innovation and collaboration with other initiatives, promoting new activities, supporting businesses and supporting the consolidation of projects. The Foundation operates by channelling the contributions made by the cooperatives of the Mondragón Corporation by virtue of different funds and awards grants with the resources received.

At the same time, the remaining 3.2% (more than 5 million euros in 2024 and 3.4 million euros in 2023) is distributed in dozens of contributions to foundations and non-profit organisations. The classification of destinations is: promotion of cooperativism, sustainable communities, education and training, and innovation and new activities.

Measures to combat money laundering (in response to Law 11/2018)

LABORAL Kutxa's management policies identify the greatest risks in the areas of fraud and the discovery of secrets with the fight against money laundering and the financing of terrorism. In this regard, it undertakes to establish the necessary bodies and procedures in accordance with current regulations and international standards. To this end,

- Within the Entity's organisational structure, the Internal Control Body (ICB) has been created at Group level, with specific functions in the area of prevention.
- In addition, precise rules and procedures have been established and are contained in a "Manual on the Prevention of Money Laundering and Terrorist Financing", the latest version of which was approved on 04/01/2023.

The Corporate Policy for Money Laundering and Financing of Terrorism Prevention affects the entire LABORAL Kutxa Group, including its subsidiary companies.

The objectives of these rules and procedures, which must be complied with, are:

- To strictly comply with the regulations in force at all times, as well as the recommendations issued by national and international bodies and authorities.
- To introduce rules for action and appropriate control and communication systems to prevent funds of a criminal origin from being channelled through the LABORAL Kutxa Group and to impede access to certain persons.
- To establish customer admission policies.
- To ensure that working members and other employees adhere to the "know your customer" procedures.

These policies and procedures are primarily preventive in nature. In addition, internal control procedures are subject to an annual review by an external expert so that a rationale for continuous improvement in reducing exposure to these money laundering and financing of terrorism risks can be applied.

C1-Cybersecurity and data processing

[SBM-2] Stakeholders' interests and views

This information is described in section NEIS2-SBM2.

[IRO-1] Description of the processes for identifying and assessing material impacts, risks and opportunities

This information is described in section NEIS2-IRO1.

[SBM-3] Material impacts, risks and opportunities and their interaction with the strategy and business model

Digital transformation has revolutionised the financial sector in recent years, introducing new technologies and business models that have brought with them specific impacts, risks and opportunities that pose environmental, social and governance challenges.

In addition to those considered to be of relative importance derived from the materiality study and described in NEIS2 SBM-3, LABORAL Kutxa also considers and manages the following impacts, risks and opportunities, as well as their time horizons (s, m and l term):

Key Impacts

- **Increased operational efficiency** by automating processes, reducing costs and increasing efficiency. short-term
- **Emergence of new business models** such as corporate banking, online banking and mobile banking, which are increasingly used, broadening the range of services offered and opening up new market segments. short-term
- **Improved customer experience** through personalised treatment, which has led to the creation of direct communication channels with customers to offer more agile and convenient services. medium-term
- **Intensification of competition** which, through the development of increasingly advanced solutions, forces entities such as LABORAL Kutxa to constantly evolve. long-term

Main risks

- Increase in attempts involving **financial fraud** such as phishing, smishing or identity theft. short-term

- **Significant damage to the reputation** of LABORAL Kutxa, caused by an increase in the sophistication of cyber-attacks against information, infrastructure or corporate websites that erode the trust of its customers. Medium- and Long-term
- Exposure to **sanctions for legal and regulatory non-compliance** of the regulations to which the entity is subject. Medium- and Long-term

Opportunities

- Investment in **innovation** to ensure that cybersecurity at LABORAL Kutxa becomes a differentiating and competitive element, allowing us to offer more secure and reliable services in the sector. medium-term
- Implementation of **new functionalities** or creation of new **products and services** aligned with technological advances in biometric or behaviour-based security through artificial intelligence. medium-term
- **Improved decision making** by analysing data from security reports. medium-term
- Building **trust** among both **current and potential customers**, who perceive LABORAL Kutxa as an entity capable of dealing with and mitigating the risks of a cyber-attack. long-term

LABORAL Kutxa is working on the proactive management of cybersecurity risks which, together with the opportunities offered by new technologies, allow it to improve the user experience in the different non-face-to-face channels available to customers and position the company in a highly competitive and constantly evolving environment.

To achieve this, a cyber risk management operating model based on industry best practices has been implemented. This model makes it possible to proactively identify, assess and mitigate threats to information security, guaranteeing the confidentiality, integrity, authenticity, availability and traceability of sensitive data and information on its customers and services offered. The result of this exercise is updated periodically or in the event of significant changes that may affect LABORAL Kutxa's systems, always maintaining control over the Entity's risk, so that it complies with the established risk appetite, tolerance and limits.

[C1-1] [MDR-P] Policies related to cybersecurity and information protection

LABORAL Kutxa is aware that good governance and correct adaptation to a changing environment in terms of cybersecurity ensure business continuity and the trust of its stakeholders, reducing the risk of financial losses and reputational damage.

Thus, LABORAL Kutxa is working on a model of governance in cybersecurity and separation of functions, with the composition of multidisciplinary committees set up to monitor and make strategic decisions in relation to the different initiatives and projects which, among others, are included in the Comprehensive Security Master Plan (hereinafter, CSMP).

Derived from the CSMP, in recent years the Governing Board has approved various policies to address the impacts, risks and opportunities related to cybersecurity and information protection. In order to preserve the effectiveness of these policies, given their sensitivity, no details are provided. Some of these policies are:

- ICT risk management policy.
- ICT-related incident management policy.
- Comprehensive Security Policy (CNS).
- Data Governance Policy.

In order to both guarantee the protection of the corporate information system and to comply with regulatory commitments and the requirements of the relevant authorities, the Entity has an Information Security Management System (ISMS) structured according to the level of granularity in question, in which a set of security policies and procedures have been defined and are periodically updated, setting out the mandatory channels, rules and guidelines for the correct management of information technology assets and resources.

In addition, LABORAL Kutxa periodically reviews its governance framework, ensuring alignment with best practices, standards and applicable regulations, allowing the Entity to keep up to date with new scenarios of emerging threats in the sector.

[C1-2] Processes for redressing negative effects and channels for stakeholders to raise concerns

As explained in NEIS S4-3 Processes to redress negative effects and channels for consumers and end-users to raise their concerns, there are mechanisms (Customer Service) for consumers and users to raise their concerns, including on cybersecurity and data security issues.

[C1-3] [MDR-A] Adopting measures on material impacts and approaches to manage material risks and take advantage of material opportunities

Since the definition of its current CSMP (2023-2025), LABORAL Kutxa has continued to make steady progress in adopting measures to mitigate the impact of the materialisation of the risks to which the Entity and its stakeholders are exposed.

During the upcoming 2025 financial year, the CSMP will be reviewed and redefined, with the aim of continuing to demonstrate LABORAL Kutxa's commitment to cybersecurity in the long term, in line with new trends and the organisation's strategic objectives.

In relation to this strategic line, LABORAL Kutxa has promoted a number of initiatives over the years within the framework of various lines of action. Given the sensitivity of cybersecurity-related information, they are explained in a general way without providing further detail:

Governance

The cybersecurity operating model has been updated and expanded to include stakeholders across the organisation, improving the integration of cybersecurity into technology products, services and processes.

For LABORAL Kutxa it is of vital importance, given its self-demanding nature and commitment to raising the level of security across all its lines of business, to remain aligned with the strategy adopted by the company in terms of security.

Awareness raising and training

Trust is the cornerstone of the relationship between LABORAL Kutxa and its customers. For this trust to materialise, LABORAL Kutxa is committed to adopting a culture of cybersecurity that cuts across the entire organisation, in which everyone plays a fundamental role in the protection of information and the assets that contain it.

Through continuous training programmes focused on the design and development of actions based on identified weaknesses, the Entity fosters global awareness of cybersecurity risks and best practices to prevent or mitigate them.

In addition, specific training actions have been developed for all the people in the organisation to ensure the provision of skills for the early detection of and, where appropriate, response to attempted cyber-attacks or identity theft.

Protection measures

With regard to the application of protection measures, LABORAL Kutxa has maintained its objective of implementing technical security projects that not only provide a solution to the increasingly strict regulatory requirements, but also serve to position LABORAL Kutxa as a benchmark for security and trust in its sector.

On the other hand, cybersecurity has been integrated as a strategic pillar in all the Entity's projects, guaranteeing data protection, operational continuity and resilience in the face of digital threats. This approach has involved the adoption of security practices from design through collaboration between areas, establishing processes that incorporate cyber risk assessments from the early stages of projects, as well as the implementation of advanced controls to mitigate risks.

Surveillance and Monitoring

In order to anticipate any incident that could trigger a contingency situation, LABORAL Kutxa is committed to establishing a direct and permanent line of collaboration with authorities and concerned third parties for the prompt management of cyber incidents, under the premise of proactivity and support in the adoption of measures to facilitate their resolution.

To this end, the development of tools has been promoted to enable LABORAL Kutxa's security teams to integrate and coordinate independent security tools, automate tasks and streamline incident response work flows, adapting operational processes based on the results obtained after carrying out controlled exercises, lessons learned and participation in forums and spaces that allow LABORAL Kutxa to be at the forefront of knowledge and/or dealing with emerging threats in the sector.

Operational resilience

During this year, LABORAL Kutxa has focused its operational resilience efforts on the evolution of the Business Continuity system and processes through the review and improvement of the Specific Security Plans, based on the lessons learned from cyber exercises and controlled continuity tests.

The materialisation of this improvement translates into an improvement and automation of the detection and response capabilities to cyber-attacks or disasters that may impact the availability of the services provided by LABORAL Kutxa, exposing the company to severe economic and reputational damage.

[C1-4] [MDR-T] Objectives related to the management of negative material impacts, the promotion of positive impacts and the management of material risks and opportunities

Proper management of security risks and incidents is essential for the definition of new objectives and strategies that allow LABORAL Kutxa to remain at the forefront of cybersecurity. In an increasingly complex and ever-changing environment, the ability to identify, assess and mitigate risks not only protects against potential threats, but also provides opportunities to evolve and adapt to new challenges.

The adequate handling of security incidents allows lessons to be learned, which is essential for improving LABORAL Kutxa's systems and processes. Analysing the root causes of incidents helps to define new goals, such as strengthening defences against emerging threats, improving staff training or investing in new innovative technologies. Effective risk management and incident response can also identify vulnerabilities before they are exploited, making it easier to anticipate potential attacks and design more robust strategies.

In this sense, LABORAL Kutxa maintains a proactive approach that fosters a resilient organisational culture, capable of adapting to changes, allowing the organisation not only to protect its assets, but also to innovate in technological solutions and processes, promoting trust among its customers, partners and other stakeholders.

As a result, LABORAL Kutxa has set ambitious but realistic objectives to ensure that cybersecurity continues to be a differential value for the Entity, among which the following stand out:

- Ensure the confidentiality, integrity and availability of financial information and personal data of customers.
- Ensure operational resilience against cyber-attacks or service disruptions.
- Maintain a high level of compliance with financial sector rules and regulations.
- Securing electronic transactions and payment systems (security of transactions).
- Establish capabilities for rapid detection and response to security incidents (through the use of new AI-based technologies).
- Promote a transversal corporate culture oriented towards cybersecurity and protection of sensitive data (training of customers and employees).
- Assess and manage security in the supply chain and ICT service providers.
- Integrating new innovative technologies in a safe way.
- Promote customer trust and brand reputation through clear and transparent actions.

Given the sensitivity of the actions addressing cybersecurity risks, the targets are not further detailed.

Correlation table with Law 11/2018 and Taxonomy Regulation

The following table details the index of the information required under Law 11/2018, of 28 December, on non-financial information and diversity together with the reporting framework taken as a reference.

| Requirements of Law 11/2018 | | Reporting framework | Section |
|--|-----------------------------------|---|--|
| General affairs | | | |
| Business model | Description of the business model | NEIS 2-SBM-1 | NEIS 2 - General information - [SBM-1] |
| | Business environment | NEIS 2-SBM-2 | NEIS 2 - General information - [SBM-2] |
| | Organisation and structure | NEIS 2-GOV-1 | NEIS 2 - General information - [GOV-1] |
| | Markets in which we operate | NEIS 2-SBM-1 | NEIS 2 - General information - [SBM-1] |
| | Objectives and strategies | NEIS 2-SBM-1 MDR-T | NEIS 2 - General information - [SBM-1] |
| | | | NEIS 1 - Climate change - [E1-4] |
| NEIS S1 - Own personnel - [S1-5] | | | |
| NEIS S4 - Consumers and end-users - [S4-5] | | | |
| The main factors and trends that may affect its future evolution | | C1 - Cybersecurity and data processing - [C1-4] | |
| General | Reporting framework | NEIS 2-SBM-1 | NEIS 2 - General information - [SBM-1] |
| | Materiality analysis | NEIS 2-BP-2 | NEIS 2 - General information - [BP-2] |
| | | NEIS 2-IRO-1 | NEIS 2 - General information - [IRO-1] |

| Requirements of Law 11/2018 | | Reporting framework | Section |
|-----------------------------|--|--|---|
| General affairs | | | |
| Management approach | Description of the applicable policies | NEIS 2-MDR-P | NEIS 2 - General information - [MDR-P] |
| | | NEIS E1-E1-2 | NEIS E1 - Climate change - [E1-2] |
| | | NEIS S1-S1-1 | NEIS S1 - Own personnel - [S1-1] |
| | | NEIS S4-S4-1 | NEIS S4 - Consumers and end-users - [S4-1] |
| | | NEIS G1-G1-1 | C1 - Cybersecurity and data processing - [C1-1] |
| | The results of these policies | NEIS 2-SBM-1 | NEIS 2 - General information - [SBM-1] |
| | | NEIS E1 | NEIS E1 - Climate change |
| | | NEIS S1 | NEIS S1 - Own personnel |
| | | NEIS S4 | NEIS S4 - Consumers and end-users |
| | | NEIS G1 | C1 - Cybersecurity and data processing |
| | The main risks related to these issues linked to the Group's activities | | NEIS S2-Employees of the value chain |
| | | NEIS S3-Affected communities | |
| NEIS 2-SBM-3 | | NEIS 2 - General information - [SBM-3] | |
| | NEIS 2-IRO-1 | NEIS 2 - General information - [IRO-1] | |
| Environmental issues | | | |
| Environmental management | Detailed information on the current and foreseeable effects of the company's activities on the environment and, where appropriate, on health and safety. | | |
| | | NEIS 2-SBM-3 | NEIS 2 - General information - [SBM-3] |
| | | NEIS E1-SBM-3 | NEIS E1 - Climate change - [SBM-3] |
| | | NEIS E1-E1-1 | NEIS E1 - Climate change - [E1-1] |
| | | NEIS E1-E1-6 | NEIS E1 - Climate change - [E1-6] |

| Requirements of Law 11/2018 | | Reporting framework | Section |
|---|---|-----------------------------------|---|
| Environmental issues | | | |
| Environmental management | Environmental assessment or certification procedures | NEIS 2-IRO-1 | NEIS 2 - General information - [IRO-1] |
| | | NEIS E1-IRO-1 | NEIS E1 - Climate change - [IRO-1] |
| | | NEIS E1-E1-1 | NEIS E1 - Climate change - [E1-1] |
| | Resources dedicated to the prevention of environmental risks | NEIS 2-SBM-1 | NEIS 2 - General information - [SBM-1] |
| | | NEIS 2-MDR-A | NEIS 2 - General information - [MDR-A] |
| | | | NEIS E1 - Climate change - [E1-9] |
| | Application of the precautionary principle | NEIS 2-MDR-P | NEIS E1 - Climate change - [SMB-3] |
| | | NEIS 2-MDR-A | |
| NEIS 2-MDR-M | | | |
| Amount of provisions and guarantees for environmental risks | NEIS 2-MDR-A | NEIS E1 - Climate change - [E1-9] | |
| | | | |
| | | | |
| Pollution | Measures to prevent, reduce or remedy emissions that seriously affect the environment; taking into account any form of activity-specific air pollution, including noise and light pollution | NEIS 2-MDR-A | NEIS 2 - General information - [IRO-1] |
| | | NEIS E2-IRO-1 | |
| Circular economy and waste prevention and management | Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste. | NEIS 2-MDR-A NEIS E5-IRO-1 | NEIS E5 - Use of resources and circular economy |
| | Actions to combat food waste | - | Non-material |

| Requirements of Law 11/2018 | | | Reporting framework | | Section |
|------------------------------|---|---|---------------------|---|---------|
| Environmental issues | | | | | |
| Sustainable use of resources | Water consumption and water supply in accordance with the local limitations | Consumption of raw materials and the measures taken to improve the efficiency of its use | NEIS 2 MDR-A | NEIS E3 - Water and marine resources | |
| | | | NEIS 2 MDR-M | | |
| | | | NEIS E3 IRO-1 | | |
| | | Direct and indirect energy consumption | NEIS 2 MDR-A | NEIS E5 - Use of resources and circular economy | |
| | | | NEIS 2 MDR-M | | |
| | | | NEIS E5 IRO-1 | | |
| | Measures taken to improve energy efficiency | Use of renewable energy | NEIS E1-E1-5 | NEIS E1 - Climate change - [E1-5] | |
| | | | NEIS 2-MDR-A | NEIS E1 - Climate change - [E1-1] | |
| | | | NEIS E1-E1-3 | | |
| | | Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces. | NEIS E1-E1-5 | NEIS E1 - Climate change - [E1-1] | |
| | | | NEIS E1-E1-4 | NEIS E1 - Climate change - [E1-1] | |
| | | | NEIS E1-E1-6 | NEIS E1 - Climate change - [E1-6] | |
| Climate change | Measures taken to adapt to the consequences of climate change | Reduction targets established voluntarily in the medium and long term for reducing greenhouse gas emissions and the measures implemented for this purpose | NEIS 2-MDR-M | | |
| | | | NEIS 2-SBM-3 | NEIS E1 - Climate change - [E1-3] | |
| | | | NEIS 2-MDR-A | NEIS E1 - Climate change - [SMB-3] | |
| | | | NEIS E1-E1-3 | | |
| | | | NEIS 2-MDR-T | NEIS E1 - Climate change - [E1-4] | |
| | | | NEIS E1-E1-4 | | |
| | | | | | |

| Requirements of Law 11/2018 | | | Reporting framework | Section |
|--|--|--------------|--|--------------|
| Environmental issues | | | | |
| Protection of biodiversity | Measures taken to preserve or restore biodiversity | - | | Non-material |
| | Impacts caused by activities or operations in protected areas | - | | Non-material |
| | | | | |
| Social and personnel-related issues | | | | |
| Employment | Total number and distribution of employees by country, gender, age and professional category | NEIS 2-SBM-1 | NEIS 2 - General information - [SBM-1] | |
| | | NEIS 2-MDR-M | NEIS S1 - Own personnel - [S1-6] | |
| | | NEIS S1-S1-6 | | |
| | | | | |
| | Total number and distribution of employment contract modalities | NEIS-MDR-M | NEIS S1 - Own personnel - [S1-6] | |
| | | NEIS S1-S1-6 | | |
| | Annual average by type of contract (permanent, temporary and part-time) by gender, age and professional classification | NEIS-2-MDR-M | NEIS S1 - Own personnel - [S1-6] | |
| | | NEIS S1-S1-6 | | |
| | Number of redundancies by gender, age and professional category | NEIS-2-MDR-M | NEIS S1 - Own personnel - [S1-6] | |
| | | NEIS S1-S1-6 | | |
| | Average earnings and their evolution disaggregated by gender, age and professional classification or equal value | NEIS-2-MDR-M | NEIS S1 - Own personnel - [S1-10] | |
| | | | | |

| Requirements of Law 11/2018 | | | Reporting framework | Section |
|-------------------------------------|--|---|---------------------|-----------------------------------|
| Social and personnel-related issues | | | | |
| Employment | Average remuneration of board members and directors, including variable remuneration, per diem, indemnities, payment into long-term savings forecast systems and any other perception, broken down by gender | | NEIS-2-MDR-M | NEIS S1 - Own personnel - [S1-10] |
| | | | NEIS 2-GOV-3 | |
| | | | NEIS-E1-GOV-3 | |
| | | Wage gap | - | NEIS S1 - Own personnel - [S1-16] |
| | | Implementation of work disengagement policies | NEIS 2-MDR-P | NEIS S1 - Own personnel - [S1-11] |
| | Employees with disabilities | | NEIS S1-S1-1 | |
| | | | NEIS S1-S1-12 | NEIS S1 - Own personnel - [S1-12] |
| | | | NEIS 2-MDR-A | NEIS S1 - Own personnel - [S1-11] |
| | | | NEIS 2-MDR-P | |
| | | | NEIS 2-MDR-T | |
| Organisation of work | Organisation of working time | | NEIS S1-S1-1 | |
| | | | NEIS S1-S1-4 | |
| | | | NEIS S1-S1-5 | |
| | | | NEIS 2-MDR-M | NEIS S1 - Own personnel - [S1-14] |
| | | | NEIS S1-S1-14 | |
| | Number of hours of absenteeism | | EIS 2-MDR-A | NEIS S1 - Own personnel - [S1-15] |
| | | | NEIS S1-S1-4 | |
| | | | NEIS S1-S1-15 | |
| | | | | |
| | | | | |

| Requirements of Law 11/2018 | | | Reporting framework | Section |
|--|---|--|---------------------|-----------------------------------|
| Social and personnel-related issues | | | | |
| Health and safety | Health and Safety at work conditions | | NEIS 2-MDR-A | NEIS S1 - Own personnel - [S1-14] |
| | | | NEIS S1-S1-4 | |
| | | | NEIS S1-S1-14 | |
| | Number of occupational accidents and occupational diseases by gender, frequency and severity rates, by gender | | NEIS S1-S1-14 | NEIS S1 - Own personnel - [S1-14] |
| Social relations | Organization of social dialogue, including procedures for informing and consulting staff and negotiating with them | | NEIS S1-S1-2 | NEIS S1 - Own personnel - [S1-8] |
| | | | NEIS S1-S1-8 | |
| | | | | |
| | Mechanisms and procedures that the company has in place to promote the involvement of workers in the management of the company, in terms of information, consultation and participation | | NEIS S1-SBM-2 | NEIS S1 - Own personnel - [S1-2] |
| | | | NEIS S1-S1-2 | |
| | | | NEIS S1-S1-3 | |
| | | | NEIS S1-S1-8 | |
| | Percentage of employees covered by collective bargaining by country | | NEIS S1-S1-8 | NEIS S1 - Own personnel - [S1-8] |
| | Balance of the collective bargaining agreements, particularly in the field of health and safety at work | | NEIS S1-S1-8 | NEIS S1 - Own personnel - [S1-8] |

| Requirements of Law 11/2018 | | | Reporting framework | Section |
|-------------------------------------|--|---|---------------------|-----------------------------------|
| Social and personnel-related issues | | | | |
| Training | Policies implemented in the field of training | Total number of training hours broken down by professional categories | NEIS 2-MDR-P | NEIS S1 - Own personnel - [S1-13] |
| | | | NEIS S1-S1-1 | |
| | | | NEIS S1-S1-13 | |
| | | | NEIS G1 G1-1 | |
| | | | NEIS 2-MDR-M | NEIS S1 - Own personnel - [S1-13] |
| Accessibility | Integration and universal accessibility of persons with disabilities | Measures taken to promote equal treatment and opportunities for women and men | NEIS S1-S1-13 | |
| | | | NEIS 2-MDR-A | NEIS S1 - Own personnel - [S1-12] |
| | | | NEIS S1-S1-4 | |
| | | | NEIS S1-S1-12 | |
| | | | NEIS 2-MDR-A | NEIS S1 - Own personnel - [S1-1] |
| Equality | Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men) | Measures taken to promote employment, protocols against sexual and gender-based harassment. | NEIS S1-S1-1 | NEIS S1 - Own personnel - [S1-9] |
| | | | NEIS S1-S1-4 | |
| | | | NEIS 2-MDR-A | NEIS S1 - Own personnel - [SBM-3] |
| | | | NEIS S1-S1-1 | NEIS S1 - Own personnel - [S1-1] |
| | | | NEIS S1-S1-4 | |
| | | | NEIS 2-MDR-P | NEIS S1 - Own personnel - [SBM-2] |
| | | | NEIS 2-MDR-A | NEIS S1 - Own personnel - [S1-17] |
| | | | NEIS S1-S1-1 | |
| | | | NEIS S1-S1-4 | |
| | | | NEIS 2-MDR-P | NEIS S1 - Own personnel - [SBM-2] |
| | | | NEIS S1-S1-1 | NEIS S1 - Own personnel - [S1-1] |

| Requirements of Law 11/2018 | | Reporting framework | Section |
|---|--|---------------------|--|
| Information on respect for human rights | Implementation of human rights due diligence procedures, prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and redress possible abuses committed | NEIS 2-GOV-4 | NEIS 2 - General information - [GOV-4] |
| | | NEIS 2-MDR-P | |
| | | NEIS 2-MDR-A | |
| | Complaints of human rights violations | NEIS S1-S1-17 | NEIS S1 - Own personnel - [S1-17] |
| | Promotion and enforcement of the provisions of the core conventions of the International Labour Organisation relating to respect for freedom of association and the right to collective bargaining, the elimination of discrimination in respect of employment and occupation, the elimination of forced or compulsory labour, the effective abolition of child labour | NEIS 2-MDR-P | NEIS S1 - Own personnel - [SBM-2] |
| Human rights | | NEIS S1-S1-1 | NEIS S1 - Own personnel - [S1-1] |

| Requirements of Law 11/2018 | | Reporting framework | Section |
|--|--|---|--|
| Information relating to the fight against corruption and bribery | | | |
| Corruption and bribery | Measures adopted to prevent corruption and bribery | NEIS MDR-P | NEIS 2 - General information - [SBM-1] |
| | | NEIS MDR-A | NEIS G1 - Business conduct [G1-3] |
| | | NEIS MDR-M | |
| | | NEIS MDR-T | |
| | | NEIS G1-G1-1 | |
| | | NEIS G1-G1-3 | |
| | Measures to combat money laundering | NEIS MDR-P | NEIS G1 - Business conduct - Measures to combat money laundering |
| | | NEIS MDR-A | |
| | | NEIS MDR-M | |
| | | NEIS MDR-T | |
| Contributions made to foundations and non-profit organisations | NEIS G1-G1-1 | | |
| | NEIS G1-G1-3 | | |
| | - | NEIS G1 - Business conduct - Information relating to the fight against corruption and bribery | |
| | | | |
| Information relating to the Company | | | |
| The company's commitments to sustainable development | Impact of the company's activity on employment and local development | NEIS S1-SBM-3 | NEIS S3 - Local communities - Partnership or Sponsorship Actions |
| | | NEIS S4-SBM-3 | |
| | | NEIS S1-S1-4 | |
| | | NEIS S4-S4-4 | |

| Requirements of Law 11/2018 | | | Reporting framework | Section |
|--|--|--|---------------------|--|
| Information relating to the company | | | | |
| The company's commitments to sustainable development | Impact of the company's activity on local populations and the territory | | NEIS S1-SBM-3 | NEIS S3 - Local communities - Partnership or Sponsorship Actions |
| | | | NEIS S4-SBM-3 | |
| | | | NEIS S1-S1-4 | |
| | | | NEIS S4-S4-4 | |
| | Relations with the actors of local communities and the dialog modalities used with these | | NEIS 2-SBM-2 | NEIS S3 - Local communities - Partnership or Sponsorship Actions |
| | | | NEIS S1-SBM-2 | |
| | | | NEIS S4-SBM-2 | |
| | | | NEIS S1-S1-2 | |
| | | | NEIS S4-S4-2 | |
| | Partnership or sponsorship actions | | - | NEIS S3 - Local communities - Partnership or Sponsorship Actions |
| | | | | |
| Subcontracting and suppliers | The inclusion in the purchasing policy of social issues, gender equality and environmental issues | | NEIS 2 MDR-P | NEIS S2 - Employees of the value chain |
| | | | NEIS 2 MDR-A | |
| | | | NEIS 2 MDR-M | |
| | Consideration in relations with suppliers and subcontractors regarding their social and environmental responsibility | | NEIS 2 MDR-P | NEIS S2 - Employees of the value chain |
| | | | NEIS 2 MDR-A | |
| | | | NEIS 2 MDR-M | |
| | Monitoring and audit systems and results of the same | | NEIS 2 MDR-P | NEIS S2 - Employees of the value chain |
| | | | NEIS 2 MDR-A | |
| | | | NEIS 2 MDR-M | |

| Requirements of Law 11/2018 | | Reporting framework | Section |
|--|---|---|--|
| Information relating to the company | | | |
| Consumers | Consumer health and safety measures | NEIS 2-MDR-A | NEIS S4 - Consumers and end-users [S4-4] |
| | | NEIS S4-S4-4 | |
| | | | |
| Tax information | Complaint systems, complaints received and their resolution | NEIS S4-S4-3 | NEIS S4 - Consumers and end-users [S4-3] |
| | Profits obtained country by country | - | NEIS S3 - Local communities - Fiscal information |
| | Income tax paid | - | NEIS S3 - Local communities - Fiscal information |
| | Public subsidies received | - | NEIS S3 - Local communities - Fiscal information |
| Regulation (EU) 2020/852- Taxonomy | | | |
| Regulation (EU) 2020/852- Taxonomy | | DELEGATED REGULATION (EU) 2023/2486 as regards the disclosure of specific public information on these economic activities | NEIS E1 - Climate change - Taxonomy Regulation (EU) Appendix: Taxonomy Regulation Indicators (EU) |
| | | DELEGATED REGULATION (EU) 2022/1214 as regards the public disclosure of specific information on these economic activities | |

Table of contents associated with other regulations

List of data points included in cross-cutting standards and thematic standards derived from EU legislation, other than CSRD and NEIS.

| Disclosure requirement and data point | Description | Section | SFDR | Pillar 3 | Regulation References indices | European Legislation on Climate |
|---------------------------------------|--|---|------|----------|-------------------------------|---------------------------------|
| NEIS 2 GOV-1 | Gender diversity of the board of directors, paragraph 21(d) | GOV-1: The role of administrative, managerial and supervisory bodies | X | | X | |
| NEIS 2 GOV-1 | Percentage of board members who are independent, paragraph 21(e) | GOV-1: The role of administrative, managerial and supervisory bodies | | | X | |
| NEIS 2 GOV-4 | Due diligence statement, paragraph 30 | GOV-4: Due diligence statement | X | | | |
| NEIS 2 SBM-1 | Participation in fossil fuel activities paragraph, 40(d)(i) | SBM-1: Strategy, business model and value chain | X | X | X | |
| NEIS 2 SBM-1 | Participation in activities related to the production of chemicals, paragraph 40(d)(ii) | SBM-1: Strategy, business model and value chain | X | | X | |
| NEIS 2 SBM-1 | Participation in controversial arms-related activities, paragraph 40(d)(iii) | SBM-1: Strategy, business model and value chain | X | | X | |
| NEIS 2 SBM-1 | Participation in activities related to tobacco cultivation and production, paragraph 40(d)(iv) | SBM-1: Strategy, business model and value chain | | | X | |
| NEIS E1-1 | Transition plan to achieve climate neutrality by 2050, paragraph 14 | E1-1: Transition plan to mitigate climate change | | | | X |
| NEIS E1-1 | Companies excluded from benchmarks harmonised with the Paris Agreement, paragraph 16(g) | E1-1: Transition plan to mitigate climate change | | X | X | |
| NEIS E1-4 | GHG emission reduction targets, paragraph 34 | E1-4: Targets related to climate change mitigation and adaptation | X | X | X | |
| NEIS E1-5 | Energy consumption from non-renewable fossil fuels, disaggregated by source (only sectors with high climate impact) paragraph 38 | E1-5: Consumption and energy mix | X | | | |
| NEIS E1-5 | Energy consumption and mix, paragraph 37 | E1-5: Consumption and energy mix | X | | | |
| NEIS E1-5 | Energy intensity related to activities in sectors with high climate impact, paragraphs 40 to 43 | E1-5: Consumption and energy mix | X | | | |
| NEIS E1-6 | Gross GHG emissions of scope 1, 2 and 3 and total GHG emissions, paragraph 44 | E1-6: Gross GHG emissions of scope 1, 2 and 3 and total GHG emissions | X | X | X | |
| NEIS E1-6 | Gross GHG emissions intensity, paragraphs 53 to 55 | E1-6: Gross GHG emissions of scope 1, 2 and 3 and total GHG emissions | X | X | X | |
| NEIS E1-7 | GHG removals and carbon credits, paragraph 56 | E1-7: GHG removals and GHG mitigation projects financed by carbon credits | | | | X |
| NEIS E1-9 | Exposure of the benchmark portfolio to climate-related physical risks paragraph 66 | Information not required for the financial year 2024 | | | X | |
| NEIS E1-9 | Disaggregation of monetary amounts for acute and chronic physical risks, paragraph 66(a) Location of major assets exposed to significant physical risks, paragraph 66(c) | Information not required for the financial year 2024 | | X | | |

| Disclosure requirement and data point | Description | Section | SFDR | Pillar 3 | Regulation References Indices | European Legislation on Climate |
|---------------------------------------|--|--|------|----------|-------------------------------|---------------------------------|
| NEIS E1-9 | Breakdown of the book value of its real estate assets by energy efficiency, paragraph 67(c). | Information not required for the financial year 2024 | | X | | |
| NEIS E1-9 | Degree of exposure of the portfolio to climate-related opportunities, paragraph 69 | Information not required for the financial year 2024 | | | X | |
| NEIS E2-4 | Amount of each pollutant listed in Appendix II of the European PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and land, paragraph 28 | Immaterial | X | | | |
| NEIS E3-1 | Water and marine resources, paragraph 9 | Immaterial | X | | | |
| NEIS E3-1 | Specific policies, paragraph 13 | Immaterial | X | | | |
| NEIS E3-1 | Sustainable management of oceans and seas, paragraph 14 | Immaterial | X | | | |
| NEIS E3-4 | Total recycled and reused water, paragraph 28(c) | Immaterial | X | | | |
| NEIS E3-4 | Total water consumption in m3 per net receipts from own operations, paragraph 29 | Immaterial | X | | | |
| NEIS 2 - IRO 1 - E4 | paragraph 16, point (a)(i) | Immaterial | X | | | |
| NEIS 2 - IRO 1 - E4 | paragraph 16(b) | Immaterial | X | | | |
| NEIS 2 - IRO 1 - E4 | paragraph 16(c) | Immaterial | X | | | |
| NEIS E4-2 | Sustainable agricultural or land use practices or policies, paragraph 24(b) | Immaterial | X | | | |
| NEIS E4-2 | Sustainable agricultural or land use practices or policies, paragraph 24(b) | Immaterial | X | | | |
| NEIS E4-2 | Policies to address deforestation, paragraph 24(d) | Immaterial | X | | | |
| NEIS E5-5 | Non-recycled waste, paragraph 37(d) | Immaterial | X | | | |
| NEIS E5-5 | Hazardous waste and radioactive waste, paragraph 39 | Immaterial | X | | | |
| NEIS 2 - SBM3 -S1 | Risk of forced labour, paragraph 14(f) | NEIS 2 SBM-3: Material impacts, risks and opportunities and their interaction with the strategy and business model | X | | | |
| NEIS 2 - SBM3 -S1 | Risk of child labour, paragraph 14(g) | NEIS 2 SBM-3: Material impacts, risks and opportunities and their interaction with the strategy and business model | X | | | |
| NEIS S1-1 | Political commitments on human rights, paragraph 20 | S1-1: Policies related to own personnel | X | | | |
| NEIS S1-1 | Due diligence policies in respect of matters covered by core conventions 1 to 8 of the International Labour Organisation, paragraph 21 | S1-1: Policies related to own personnel | X | | X | |
| NEIS S1-1 | Processes and measures to prevent human trafficking, paragraph 22 | S1-1: Policies related to own personnel | X | | | |
| NEIS S1-1 | Workplace accident prevention policies or management system, paragraph 23 | S1-1: Policies related to own personnel | X | | | |
| NEIS S1-3 | Complaint or claim handling mechanisms, paragraph 32(c) | S1-3: Processes for redressing negative impacts and channels for own workers to raise concerns | X | | | |
| NEIS S1-14 | Number of fatalities and number and rate of accidents at work, paragraph 88(b) and (c) | S1-14: Health and safety parameters | X | | X | |

| Disclosure requirement and data point | Description | Section | SFDR | Pillar 3 | Regulation References Indices | European Legislation on Climate |
|---------------------------------------|--|--|------|----------|-------------------------------|---------------------------------|
| NEIS S1-14 | Number of days lost due to injury, accident, death or illness, paragraph 88(e) | S1-14: Health and safety parameters | X | | | |
| NEIS S1-16 | Gender pay gap, unadjusted, paragraph 97(a) | S1-16: Pay parameters (pay gap and total pay) | X | | X | |
| NEIS S1-16 | Excessive pay gap between the executive director and employees, paragraph 97(b) | S1-16: Pay parameters (pay gap and total pay) | X | | | |
| NEIS S1-17 | Cases of discrimination, paragraph 103(a) | S1-17: Serious human rights-related incidents, complaints and impacts | X | | | |
| NEIS S1-17 | Non-compliance with the Guiding Principles of the United Nations on Business and Human Rights and the OECD Guidelines, paragraph 104(a) | S1-17: Serious human rights-related incidents, complaints and impacts | X | | X | |
| NEIS 2 SBM3-S2 | Significant risk of child labour or forced labour in the value chain, paragraph 11(b) | Immaterial | X | | | |
| NEIS S2-1 | Political commitments on human rights, paragraph 17 | Immaterial | X | | | |
| NEIS S2-1 | Policies related to workers of the value chain, paragraph 18 | Immaterial | X | | X | |
| NEIS S1-1 | Non-compliance with the Guiding Principles of the United Nations on Business and Human Rights and the OECD Guidelines, paragraph 19 | Immaterial | X | | X | |
| NEIS S2-1 | Due diligence policies in respect of matters covered by core conventions 1 to 8 of the International Labour Organisation, paragraph 19 | Immaterial | X | | | |
| NEIS S2-4 | Human rights issues and incidents related to upstream and downstream parts of their value chain, paragraph 3 | Immaterial | X | | | |
| NEIS S3-1 | Political commitments on human rights, paragraph 16 | Immaterial | X | | X | |
| NEIS S3-1 | Non-compliance with the Guiding Principles of the United Nations on Business and Human Rights, the ILO principles or the OECD Guidelines, paragraph 17 | Immaterial | X | | | |
| NEIS S3-4 | Human rights issues and incidents, paragraph 36 | Immaterial | X | | | |
| NEIS S4-1 | Policies related to consumers and end-users, paragraph 16 | S4-1: Policies related to consumers and end-users | X | | X | |
| NEIS S4-1 | Non-compliance with the Guiding Principles of the United Nations on Business and Human Rights and the OECD Guidelines, paragraph 17 | S4-1: Policies related to consumers and end-users | X | | | |
| NEIS S4-4 | Human rights issues and incidents, paragraph 35 | S4-4: Adoption of measures related to material impacts on consumers and end-users, approaches to mitigate material risks and exploit material opportunities related to consumers and end-users and the effectiveness of such actions | X | | | |
| NEIS G1-1 | United Nations Convention against Corruption, paragraph 10(b) | G1-1: Corporate culture and corporate culture and business conduct policies | X | | | |
| NEIS G1-1 | Whistleblower protection paragraph 10(d) | G1-1: Corporate culture and corporate culture and business conduct policies | X | | | |

| Disclosure requirement and data point | Description | Section | SFDR | Pillar 3 | Regulation References indices | European Legislation on Climate |
|---------------------------------------|--|--|------|----------|-------------------------------|---------------------------------|
| NEIS G1-4 | Fines for breaches of anti-corruption and anti-bribery laws, paragraph 24(a) | G1-4: Confirmed cases of corruption or bribery | X | | X | |
| NEIS G1-4 | Anti-corruption and anti-bribery standards, paragraph 24(b) | G1-4: Confirmed cases of corruption or bribery | X | | | |

Appendix: Taxonomy Regulation Indicators (EU)

GAR NyG 001

| Actividades relacionadas con la energía nuclear | | S/NO | Importe VN (Millones) | Importe CAPEX (Millones) |
|--|---|------|--------------------------|-----------------------------|
| La empresa lleva a cabo, financia o tiene exposiciones a la investigación, el desarrollo, la demostración y la implantación de instalaciones innovadoras de generación de electricidad que producen energía a partir de procesos nucleares con un mínimo de residuos del ciclo de combustible. | | NO | 0 | 0 |
| | La empresa lleva a cabo, financia o tiene exposiciones a la construcción y la explotación segura de nuevas instalaciones nucleares para producir electricidad o calor de proceso, incluido para fines de calefacción urbana o procesos industriales como la producción de hidrógeno, así como sus mejoras de seguridad, utilizando las mejores tecnologías disponibles. | NO | 0 | 0 |
| | La empresa lleva a cabo, financia o tiene exposiciones a la explotación segura de instalaciones nucleares existentes que producen electricidad o calor de proceso, incluido para fines de calefacción urbana o procesos industriales como la producción de hidrógeno a partir de energía nuclear, así como sus mejoras de seguridad. | NO | 0 | 0 |
| Actividades relacionadas con el gas fósil | | | | |
| La empresa lleva a cabo, financia o tiene exposiciones a la construcción o explotación de instalaciones de generación de electricidad que producen energía a partir de combustibles fósiles gaseosos. | | SI | 2 | 1 |
| | La empresa lleva a cabo, financia o tiene exposiciones a la construcción, la renovación y la explotación de instalaciones de generación combinada de calor/frío y electricidad que utilicen combustibles fósiles gaseosos. | SI | 0 | 0 |
| | La empresa lleva a cabo, financia o tiene exposiciones a la construcción, la renovación y la explotación de instalaciones de generación de calor que producen calor/frío a partir de combustibles fósiles gaseosos. | SI | 0 | 0 |

GAR NyG 002 CAPEX

| Actividades económicas | Importe y proporción (la información debe presentarse en importes monetarios y en porcentajes) | | | | | |
|--|--|------|---------------------------------|------|--------------------------------|------|
| | (CCM + CCA) | | Mitigación del cambio climático | | Adaptación al cambio climático | |
| | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.26 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.27 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.28 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.29 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.30 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.31 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de otras actividades económicas que se ajustan a la taxonomía no mencionadas en las filas 1 a 6 en el denominador del ICR aplicable | 842 | 4,74 | 842 | 4,74 | 0 | 0,00 |
| Total ICR aplicable | 842 | 4,74 | 842 | 4,74 | 0 | 0,00 |

GAR NyG 002 BUSINESS VOLUME

| Actividades económicas | Importe y proporción (la información debe presentarse en importes monetarios y en porcentajes) | | | | | | | |
|--|--|------|---------------------------------|------|--------------------------------|------|------------------------|------|
| | (CCM + CCA) | | Mitigación del cambio climático | | Adaptación al cambio climático | | | |
| | | | | | | | | |
| | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.26 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.27 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.28 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.29 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.30 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.31 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de otras actividades económicas que se ajustan a la taxonomía no mencionadas en las filas 1 a 6 en el denominador del ICR aplicable | 812 | 4,57 | 812 | 4,57 | 812 | 4,57 | 812 | 4,57 |
| Total ICR aplicable | 812 | 4,57 | 812 | 4,57 | 812 | 4,57 | 812 | 4,57 |

GAR NyG 003 CAPEX

| Actividades económicas | Importe y proporción (la información debe presentarse en importes monetarios y en (CCM + CCA) | | Mitigación del cambio | | Adaptación al cambio | |
|--|---|--------|------------------------|-------|------------------------|------|
| | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.26 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.27 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.28 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.29 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.30 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.31 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de otras actividades económicas que se ajustan a la taxonomía no mencionadas en las filas 1 a 6 en el numerador del ICR aplicable | 842 | 100,00 | 842 | 99,99 | 0 | 0,01 |
| Total ICR aplicable | 842 | 100,00 | 842 | 99,99 | 0 | 0,01 |

GAR NyG 003 BUSINESS VOLUME

| Actividades económicas | Importe y proporción (la información debe presentarse en importes monetarios y en porcentajes) | | | | | | |
|--|--|--------|------------------------|-------|------------------------|------|--|
| | (CCM + CCA) | | Mitigación del cambio | | Adaptación al cambio | | |
| | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % | |
| | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % | |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.26 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.27 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.28 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.29 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.30 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | |
| Importe y proporción de la actividad económica que se ajusta a la taxonomía a la que se hace referencia en la sección 4.31 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el numerador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 | |
| Importe y proporción de otras actividades económicas que se ajustan a la taxonomía no mencionadas en las filas 1 a 6 en el numerador del ICR aplicable | 812 | 100,00 | 812 | 99,99 | 0 | 0,01 | |
| Total ICR aplicable | 812 | 100,00 | 812 | 99,99 | 0 | 0,01 | |

GAR NyG 004 CAPEX

| Actividades económicas | Importe y proporción (la información debe presentarse en importes monetarios y en porcentajes) | | | | | |
|---|--|-------|--------------------------------|-------|------------------------|------|
| | Mitigación del cambio climático | | Adaptación al cambio climático | | | |
| | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.26 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.27 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.28 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.29 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 1 | 0,00 | 1 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.30 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.31 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de otras actividades económicas elegibles según la taxonomía pero que no se ajustan a la taxonomía no mencionadas en las filas 1 a 6 precedentes en el denominador del ICR aplicable | 9.401 | 52,90 | 9.401 | 52,90 | 0 | 0,00 |
| Importe y proporción de las actividades económicas elegibles según la taxonomía pero que no se ajustan a la taxonomía en el denominador del ICR aplicable | 9.401 | 52,91 | 9.401 | 52,91 | 0 | 0,00 |

GAR N&G 004 BUSINESS VOLUME

| Actividades económicas | Importe y proporción (la información debe presentarse en importes monetarios y en porcentajes) | | | | | |
|---|--|-------|---------------------------------|-------|--------------------------------|------|
| | (CCM + CCA) | | Mitigación del cambio climático | | Adaptación al cambio climático | |
| | Importe (Millones EUR) | % | Importe (Millones EUR) | % | Importe (Millones EUR) | % |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.26 de los anexos I y II del Reglamento o Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.27 de los anexos I y II del Reglamento o Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.28 de los anexos I y II del Reglamento o Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.29 de los anexos I y II del Reglamento o Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 2 | 0,01 | 2 | 0,01 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.30 de los anexos I y II del Reglamento o Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de la actividad económica elegible según la taxonomía pero que no se ajusta a la taxonomía a que se hace referencia en la sección 4.31 de los anexos I y II del Reglamento o Delegado (UE) 2021/2139 en el denominador del ICR aplicable | 0 | 0,00 | 0 | 0,00 | 0 | 0,00 |
| Importe y proporción de otras actividades económicas elegibles según la taxonomía pero que no se ajustan a la taxonomía no mencionadas en las filas 1 a 6 precedentes en el denominador del ICR aplicable | 9.403 | 52,92 | 9.403 | 52,92 | 0 | 0,00 |
| Importe y proporción de las actividades económicas elegibles según la taxonomía pero que no se ajustan a la taxonomía en el denominador del ICR aplicable | 9.405 | 52,93 | 9.405 | 52,93 | 0 | 0,00 |

GAR NyG 005 CAPEX

| Actividades relacionadas con la energía nuclear | | | Importe (Millones EUR) | Porcentaje |
|--|--|--|---------------------------|------------|
| Importe y proporción de la actividad económica a que se hace referencia en la fila 1 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.26 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 2 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.27 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 3 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.28 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 4 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.29 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 5 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.30 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 6 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.31 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | | 0 | 0,00 |
| Importe y proporción de otras actividades económicas no elegibles según la taxonomía no mencionadas en las filas 1 a 6 precedentes en el denominador del ICR aplicable | | | 7.525 | 42,35 |
| Importe total y proporción de las actividades económicas no elegibles según la taxonomía en el denominador del ICR aplicable | | | 7.525 | 42,35 |

GAR NyG 005 BUSINESS VOLUME

| Actividades relacionadas con la energía nuclear | | Importe (Millones) | Porcentaje |
|--|--|-----------------------|------------|
| Importe y proporción de la actividad económica a que se hace referencia en la fila 1 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.26 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 2 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.27 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 3 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.28 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 4 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.29 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 5 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.30 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | 0 | 0,00 |
| Importe y proporción de la actividad económica a que se hace referencia en la fila 6 de la plantilla 1 que no es elegible según la taxonomía con arreglo a la sección 4.31 de los anexos I y II del Reglamento Delegado (UE) 2021/2139 en el denominador del ICR aplicable | | 0 | 0,00 |

GAR 000

| | | Total de activos medioambientalmente sostenibles (Volumen de Negocio) (Millones EUR) | Total de activos medioambientalmente sostenibles (Capex) (Millones EUR) | Indicador clave de resultados (Volumen de Negocio) | Indicador clave de resultados (CapEx) | % cobertura (sobre los activos totales) | % de activos excluidos del numerador de la GAR (artículo 7, apartados 2 y 3, y anexo V, sección 1.1.2) | % de activos excluidos del denominador de la GAR (artículo 7, apartado 1, y anexo V, sección 1.2.4) |
|---|--|--|---|--|---------------------------------------|---|--|---|
| Indicador clave de resultados principal | | | | | | | | |
| | Ratio de activos verdes (GAR) en términos de stock | 812 | 842 | 4,57 | 4,74 | 64,65 | 23,77 | 35,35 |
| | | Total de actividades medioambientalmente sostenibles (Volumen de Negocio) (Millones EUR) | Total de actividades medioambientalmente sostenibles (Capex) (Millones EUR) | Indicador clave de resultados (Volumen de Negocio) | Indicador clave de resultados (CapEx) | % cobertura (sobre los activos totales) | % de activos excluidos del numerador de la GAR (artículo 7, apartados 2 y 3, y anexo V, sección 1.1.2) | % de activos excluidos del denominador de la GAR (artículo 7, apartado 1, y anexo V, sección 1.2.4) |
| Indicadores clave de resultados adicionales | GAR (flujo) | 123 | 122 | 4,17 | 4,11 | 53,32 | 26,43 | 46,68 |
| | Cartera de negociación | 0 | 0 | 0,00 | 0,00 | | | |
| | Garantías financieras (stock) | 0 | 0 | 0,00 | 0,00 | | | |
| | Activos gestionados (stock) | 0 | 0 | 0,00 | 0,00 | | | |
| | Garantías financieras (flujo) | 0 | 0 | 0,00 | 0,00 | | | |
| | Activos gestionados (flujo) | 0 | 0 | 0,00 | 0,00 | | | |
| | Ingresos por honorarios y comisiones | 0 | 0 | 0,00 | 0,00 | | | |

GAR 001 BUSINESS VOLUME

[illegible]

GAR 001 T-1 BUSINESS VOLUME

[illegible]

GAR 001 BUSINESS VOLUME FLOW

[illegible]

GAR 002 CAPEX

The Entity interprets that, in the first column of each environmental objective, the amounts relating to the eligibility of the taxonomy are incorporated.

[illegible]

GAR 003 CAPEX

[illegible]

GAR 003 BUSINESS VOLUME

[illegible]

GAR 003 T-1 CAPEX

[illegible]

GAR 003 T-1 BUSINESS VOLUME

[illegible]

GAR 004 BUSINESS VOLUME

[illegible]

GAR 005.01 CAPEX

[illegible]

GAR 005.01 BUSINESS VOLUME

[illegible]

GAR 005.02 CAPEX

[illegible]

GAR 005.02 BUSINESS VOLUME

[illegible]

Independent Limited Assurance Report on
the Consolidated Non-Financial Information Statement and
Sustainability Information for the year ended
31 December 2024

CAJA LABORAL POPULAR COOP. DE CRÉDITO
AND SUBSIDIARIES

INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT AND SUSTAINABILITY INFORMATION

Translation of a report and financial statements originally issued in Spanish. In the event of discrepancy, the Spanish-language version prevails

To the shareholders of Caja Laboral Popular Coop. de Crédito:

Conclusion of limited assurance

In accordance with article 49 of the Commercial Code, we have assured, with a limited scope, the Consolidated Non-Financial Information Statement ("NFIS") for the year ended December 31, 2024 of Caja Laboral Popular Coop. de Crédito (the "Parent") and subsidiaries (the "Group"), which is part of the Group's consolidated management report.

The content of the NFIS includes information in addition to that required by prevailing company law in respect of non-financial information, specifically the Sustainability Information prepared by the Group for the year ended December 31, 2024 (the "sustainability information") in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council, of 14 December 2022, as regards corporate sustainability reporting (the "CSRD"). The sustainability information was also subject to limited assurance.

Based on the procedures applied and the evidence obtained, no matter has come to our attention that would cause us to believe that:

- a) The Group's consolidated NFIS for the year ended 31 December 2024 has not been prepared, in all material respects, in accordance with the contents required by prevailing company law and the criteria selected in European Sustainability Reporting Standards ("ESRS"), as well as other criteria described above, as explained for each matter in the "Law 11/2018 and EU Taxonomy Regulation correlation table" in the NFIS.
- b) The sustainability information, taken as a whole, has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in section "[BP-2] Disclosures in relation to specific circumstances", including:
 - That the description of the process for identifying the sustainability information to be disclosed included in section "[IRO-1] Description of the process to identify and assess material impacts, risks and opportunities" is consistent with the process implemented and that it enables the identification of the material information to be disclosed in accordance with the requirements of ESRS.
 - Compliance with ESRS.
 - Compliance with the disclosure requirements included in subsection "UE Taxonomy Regulation" on the environment and in the annex "Annex: Indicators of the EU Taxonomy Regulation" in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, on the establishment of a framework to facilitate sustainable investment.

Basis of conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Guidelines 47 (revised) and 56 issued by the Spanish Institute of Chartered Auditors on non-financial information assurance engagements and considering the contents of the note issued by the Spanish Accounting and Auditing Institute (ICAC) on December 18, 2024 (the "generally accepted professional standards").

The procedures in a limited assurance engagement are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those regulations are further described in the *Practitioner's responsibilities* section of our report.

We have complied with the independence and other ethics requirements of the International Code of Ethics for Professional Accountants (including international standards on independence) of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

Our firm applies International Standard on Quality Management (ISQC) 1, which requires us to design, implement, and operate a system of quality management that includes policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors' responsibilities

The preparation of the NFIS included in the Group's consolidated management report and its content are the responsibility of the directors of Parent. The NFIS has been prepared in accordance with the content required by prevailing company law in Spain and following selected ESRS criteria, as well as other criteria described as outlined for each matter in the "Law 11/2018 and EU Taxonomy Regulation correlation table" in that Statement.

This responsibility also includes the design, implementation, and maintenance of such internal control as considered necessary to ensure that the NFIS is free of material misstatement, whether due to fraud or error.

The directors of the Parent are also responsible for defining, implementing, adapting, and maintaining the management systems from which the necessary information for preparing the NFIS is obtained.

In relation to the sustainability information, the Parent's directors are responsible for developing and implementing a process for identifying the disclosures to be included in the sustainability information in accordance with the CSRD, ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, and for disclosing information about this process in the sustainability information in section "[IRO-1] Description of the process to identify and assess material impacts, risks and opportunities". This responsibility includes:

- ▶ Understanding the context in which the Group carries out its activities and business relationships, as well as its stakeholders, in relation to the Group's impact on people and the environment.
- ▶ Identifying the actual and potential impacts (both negative and positive), as well as risks and opportunities that could affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium or long term.
- ▶ Assessing the materiality of the identified impacts, risks and opportunities.
- ▶ Making assumptions and estimates that are reasonable under the circumstances.

The directors of the Parent are also responsible for the preparation of the sustainability information, which includes the information identified by the process, in accordance with the sustainability reporting framework used, including compliance with the CSRD, ESRS, and the disclosure requirements included in the subsection "EU Taxonomy Regulation" of the section on the environment in the annex "Annex: Indicators of the EU Taxonomy Regulation" in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- ▶ Designing, implementing and maintaining such internal control as the directors consider relevant to enable the preparation the sustainability information that is free from material misstatement, whether due to fraud or error.
- ▶ Selecting and applying appropriate methods for the presentation of sustainability information and the basis of assumptions and estimates that are reasonable, considering the circumstances, about specific disclosures.

Inherent limitations in the preparation of the information

In accordance with ESRS, the Parent's directors are required to prepare forward-looking information on the basis of assumptions and hypothetical assumptions, which must be included in the sustainability information, about potential future events and possible future actions, if any, that the Group could take. Actual results may differ significantly from estimated results, as the reference is to the future and future events frequently do not occur as expected.

In determining the disclosures in the sustainability information, the Parent's directors interpret legal and other terms that are not clearly defined and that may be interpreted differently by others, including the legal conformity of such interpretations, and, accordingly, are subject to uncertainty.

Practitioner's responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the NFIS and sustainability information are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- ▶ Design and perform procedures to assess whether the process for identifying the disclosures to be included in the NFIS and sustainability information is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of the material information to be disclosed as required in the ESRS.
- ▶ Perform risk procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are more likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- ▶ Design and perform procedures responsive to disclosures in the NFIS and sustainability information where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary from the work performed

A limited assurance engagement involves performing procedures to obtain evidence as a basis for our conclusions. The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the NFIS and sustainability information.

Our work consisted of making inquiries of management and of the Group's various business units and components that participated in the preparation of the NFIS and sustainability information, reviewing the processes used for compiling and validating the information presented in the NFIS and sustainability information, and applying certain analytical procedures and sample review tests as described below:

For assurance of the NFIS:

- ▶ Holding meetings with Group personnel to obtain an understanding of the business model, the policies and management approaches applied, and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
- ▶ Analysing the scope, relevance and completeness of the content of 2024 NFS based on the materiality assessment performed by the Group and described in section "[IRO-1] Description of the process to identify and assess material impacts, risks and opportunities" of the NFIS, considering the content required in prevailing company law.
- ▶ Analysing the processes used to compile and validate the data presented in the 2024 NFIS.
- ▶ Reviewing the disclosures relating to the risks, policies and management approaches applied with respect to the material matters presented in the 2024 NFIS.
- ▶ Checking, through sample testing, the information underlying the content of the 2024 NFIS and whether it has been adequately compiled based on data provided by information sources.

For assurance of the sustainability information:

- ▶ Making inquiries of Group personnel:
 - To understand the business model, the policies and management approaches applied and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
 - To know the source of the information used by management (e.g., interaction with stakeholders, business plans and documents on strategy) and review the Group's internal documentation on its process.
- ▶ Obtaining, through inquiries of Group personnel, insight into the Parent's processes for gathering, validation, and presenting information relevant for the preparation of its sustainability information.
- ▶ Assessing whether the evidence obtained in our procedures on the process implemented by the Group for determining the disclosures to be included in the sustainability information is consistent with the description of the process included in that information, as well as assessing whether that process implemented by the Group enables identification of the material information to be disclosed in accordance with the requirements of ESRS.
- ▶ Assessing whether all the information identified in the process implemented by the Group for determining the disclosures to be included in the sustainability information is effectively included.
- ▶ Evaluating whether the structure and presentation of the sustainability information is consistent with ESRS and the rest of the sustainability reporting framework applied by the Group.

- ▶ Performing inquiries of relevant personnel and analytical procedures on the disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Performing, as appropriate, substantive procedures through sampling of selected disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Obtaining, as appropriate, reports issued by accredited independent third parties accompanying the consolidated management report in response to the requirements of European regulations and, in relation to such information and in accordance with generally accepted professional standards, verification, exclusively, of the accreditation of the practitioner and that the scope of the report issued corresponds to that required by European regulations.
- ▶ Obtaining, as appropriate, the documents containing the information incorporated by reference, the reports issued by auditors or practitioners on such documents and, in accordance with generally accepted professional standards, verification, exclusively, that in the document to which the information incorporated by reference refers, the requirements described in ESRS for the incorporation by reference of information in the sustainability information are met.
- ▶ Obtaining a representation letter from the directors and management regarding the NFIS and sustainability information.

Other information

Management of the Parent is responsible for the other information. The other information comprises the consolidated financial statements and the rest of the information included in the consolidated management report, but does not include either the auditors' report on the consolidated financial statements or the assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the sustainability information and attached to the consolidated management report.

Our assurance report does not cover the other information and we do not express any form of assurance conclusion on it.

Our responsibility in connection with our engagement to provide assurance on the sustainability information is to read the other information identified and consider whether it is materially inconsistent with the sustainability information or the knowledge we have obtained during the assurance engagement that could indicate material misstatements in the sustainability information.

ERNST & YOUNG, S.L.

(Signed on the original version in Spanish)

Jaume Pallerols Cat

14 March 2025