



Wizink Bank, S.A.U. and Subsidiaries composing the Wizink Group

Consolidated Non-Financial and Sustainability
Information Statement report for the year ended 31
December 2024

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Wizink Bank, S.A.U. and subsidiaries composing the Wizink Group

Consolidated Non-Financial and Sustainability Information Statement report for the year ended 31 December 2024

1. **GENERAL DISCLOSURES (ESRS 2)**

1.1. **BASIS FOR PREPARATION**

1.1.1 **General basis for preparation of sustainability statement (BP1)**

This statement of non-financial and sustainability information, hereinafter referred to as the Sustainability Report, responds to the requirements of Spanish Non-Financial Information and Diversity Law 11/2018, of 28 December, amending the Spanish Commercial Code, the revised text of the Consolidated Spanish Limited Liability Companies Law approved by Royal Legislative Decree 1/2010, of 2 July, and Spanish Audit Law 22/2015, of 20 July, on non-financial information and diversity, which transposes Directive 2014/95/EU, of 22 October, on non-financial information and diversity.

On the other hand, and on a voluntary basis, it includes the sustainability information required by Directive (EU) 2022/2464 of the European Parliament and Council, of 14 December 2022, on Corporate Sustainability Reporting (CSRD), and the European Sustainability Reporting Standards (NEIS) approved on 31 July 2023 by the European Commission, whose incorporation by the Member States into the Spanish legal system should have taken place before 6 July 2024. However, the bill for its transposition in Spain was not concluded before December 31, 2024.

This report refers to the activity of WiZink Bank, S.A.U. and the companies comprising the Group, hereinafter 'Wizink', 'the Company' or 'the Bank' and is part of Wizink's Consolidated Management Report for the 2024 financial year, the scope of its consolidation being the same as that of the financial statements.

In its preparation, direct and indirect business relationships have been taken into account in the upstream and downstream stages of the value chain. In this regard, below is a breakdown of the company's value chain:

Phases		Affected stakeholders
Upstream		
	Supplies	Suppliers.
	Regulation	Regulators, clients and consumers.
	Funding	Shareholders and investors (equity and securitisations), depositors (clients) and Central Banks.
Own operations:		
	Credit origination (credit cards, personal loans, point-of-sale financing and vehicle financing)	Board members, Senior management, employees, clients and consumers.
Downstream:		
	Sales of financial instruments: distribution, marketing and sales (cross sale).	Clients, consumers and suppliers (sales agents, partners and merchants).
	Customer service	Clients and suppliers (customer support agencies).
	Recoveries/Collections	Clients and suppliers (collections agencies).

In the sections '1.3.1. Strategy, Business Model, and Value Chain' and '1.3.2. Stakeholders' Interests and Opinions,' we can find a summary of the company's business model, which includes the relationships between these parties that make up the value chain, as well as an explanation of them, their interests, and opinions.

The company has not omitted any element of information on intellectual property, know-how or innovation results.

1.1.2 Disclosures in relation to specific circumstances (BP2)

Time horizons

Wizink has adopted the criteria set by the Directive (CSRD) regarding the time horizons used, which is as follows:

1. Short-term time horizon: 1 year; the reference period in the financial statements (year 2024);
2. Medium-term time horizon: <5 years; from the end of the short-term reference period to five years later (2025-2029); and
3. Long-term time horizon: >5 years; starting five years from the end of the medium-term reference period (2030 onwards).

Value chain estimation

It has not been necessary to estimate information for data points related to the value chain, since the related topics have been concluded as non-material (see conclusion of the double materiality analysis under heading 1.3.3. IROs of relative importance and their interaction with the strategy and business model).

Sources of estimation and outcome uncertainty

No information had to be estimated for the quantitative parameters and monetary amounts disclosed in this report.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

This Sustainability Report includes in its [Annex II](#) the table with references to the information required by Law 11/2018 on non-financial information and diversity.

It also includes the information provided for in 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 investments and amending Regulation (EU) 2019/2088 and in the Commission Delegated Regulations. This information is located under section [2.1 Disclosure of information under Article 8 of Regulation \(EU\) 2020/852 \(Taxonomy Regulation\)](#).

Use of phase-In provisions in accordance with Appendix C of ESRS 1

Wizink adheres to the transitional provision of information requirements gradually introduced in relation to the disclosure requirement regarding the characteristics of non-employee workers within the company's own workforce (Disclosure Requirement S1-7).

1.2. GOVERNANCE

1.2.1. The role of the administrative, management and supervisory bodies (GOV-1)

This section provides information on the composition of the administrative, management and supervisory bodies, their functions and responsibilities in Spain and Portugal where the company operates.

Wizink's main governing body is the Board of Directors (the 'Board'), whose composition and functioning are based on compliance with the provisions established in Article 29 of Law 10/2014, of 26 June, on the regulation, supervision and solvency of credit institutions (hereinafter, 'LOSSEC') and Article 37 of Royal Decree 84/2015, of 13 February, implementing Law 10/2014, of 26 June, on the regulation, supervision and solvency of credit institutions (hereinafter, 'ROSSEC'), as well as other applicable national regulations. Furthermore, it is in line with the best market practices set out in the EBA (European Banking Authority) internal governance guidelines, in the ESMA (European Securities and Markets Authority) guidelines and in the joint ESMA and EBA guidelines on the assessment of the suitability of members of management bodies and key function holders.

Wizink's Board of Directors carries out all the tasks attributed to it under the LOSSEC and the ROSSEC. It is also the body responsible for setting strategic objectives, as well as the company's risk strategy and internal governance model. The Board also has three advisory committees that complement and support its work. The three committees (Audit Committee (AC), Risk Committee (RC), and Appointments and Remuneration Committee (ARC)) are chaired by independent directors.

Wizink's Board has delegated its management powers to a Chief Executive Officer. In turn, a series of professionals that are experts in different areas and responsible for the main departments in the bank, report directly to the CEO and are part of the Executive Committee, assisting him in the exercise of his functions. This management team is the link between the Board of Directors and the rest of the company. The members of the Management Committee with internal control functions (Risk and Compliance) report directly to the Risk Committee. In turn, the head of Internal Audit reports to the Audit Committee.

The Board of Directors is composed of six members, one of whom is executive, and five non-executive members. The percentage of women on the Board of Directors is 16.6% and the percentage of independent members is 33.3%. The Directors have different nationalities, knowledge and experience and their objective is to contribute value to Wizink, working with integrity and transparency, in the most efficient and effective way possible.

Members of the Board	Position	Type of director	Committees
Joaquim Josep Saurina Maspoch	Chairman	Non executive	-
Iheb Nafaa Ghediri	Chief Executive Officer	Executive	-
Krzysztof Drozd	Director	Propietary director	AC, ARC, RC
Ricky John Noel	Director	Propietary director	
Anna Gatti	Director	Independent	ARC, RC, AC
François Xavier Marie Miqueu	Director	Independent	AC, RC, ARC
Blanca Rivilla Calle	Secretary Non-Director	-	-
Diego Calleja de Pinedo	Deputy Secretary Non-Director	-	-

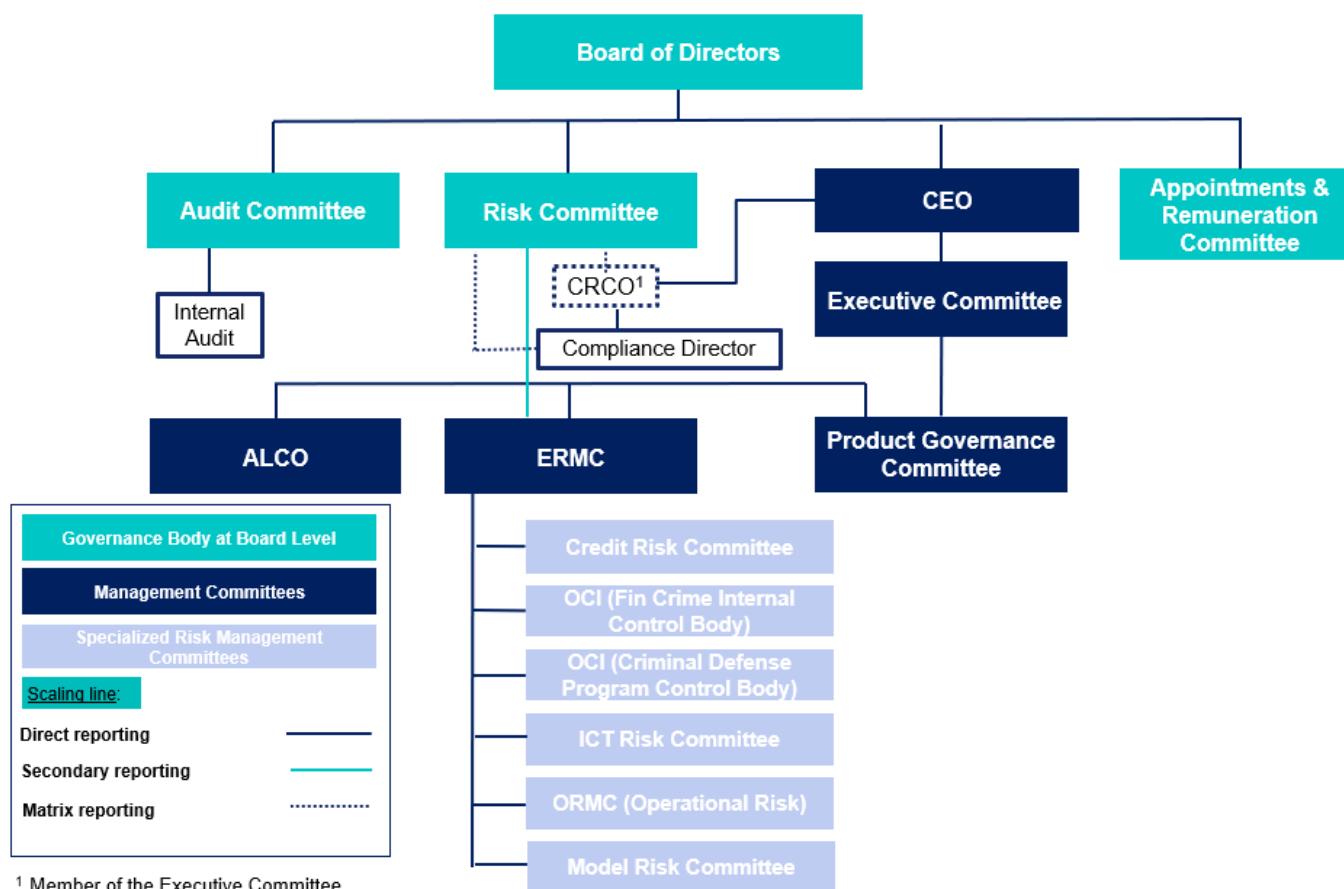
Wizink has a procedure in place to assess the suitability of the members of its Board of Directors and key management personnel. This assessment is entrusted to the Board of Directors, assisted by the Appointments and Remuneration Committee and the Secretary of the Board. Following the assessment of internal suitability, the proposal for the appointment of the members of the management body is notified to the Bank of Spain, which finally approves the appointment.

Directors and key management personnel must meet the fit and proper requirements as defined in the regulatory requirements and guidelines. They must also act in accordance with Wizink's corporate values.

In addition, they must have a strategic vision (in accordance with their responsibilities) and relevant experience in senior management positions, a thorough knowledge of the sector, as well as planning and management skills, and have sufficient time for the position.

During 2024, director Anna Gatti has been responsible for ESG within the Board of Directors. Likewise, both the Chairman of the Board of Directors and the Chief Executive Officer have participated in the review and alignment of incidents, risks and opportunities and their materiality in the dual materiality exercise which, although carried out in 2023, has been adapted to the requirements of European regulations in 2024. The Chief Executive Officer receives training during the year on ESG topics and is the member of the highest administrative, management and supervisory body with knowledge of the business model and the incidents (positive or negative, real or potential), risks and opportunities that Wizink's activity may give rise to.

The following table summarises Wizink's corporate governance structure:



Board Committees

Risk Committee

The Risk Committee (the 'RC') proposes to the Board the approval of risk management policies, assisting the Board in ensuring that strategy, objectives, principles, policies and resources are consistent with Wizink's risk appetite, regulatory requirements and industry best practices. The RC, together with the Board of Directors, also monitors and reviews the formal internal risk and control environment arrangements for internal risk and control environment. It currently consists of 3 board members who do not have executive functions in the bank. The RC is chaired by an independent director.

Appointments and Remuneration Committee

The Appointments and Remuneration Committee (the 'ARC') is responsible for assisting and advising the Board on matters relating to the appointment of directors and the remuneration of the Board and senior management, with the objective of motivating and retaining executives, and ensuring that the company attracts the best talent in the market, maximising its shareholder value. The remuneration of directors and senior management should be defined according to market benchmarks. It currently consists of 3 board members who do not have executive functions in the bank. The ARC is chaired by an independent director.

Audit Committee

The Audit Committee (the 'AC') is responsible for overseeing the preparation of the Financial Statements, including this Non-Financial and Sustainability Information Statement, together with the external auditors, and for recommending to the Board the approval of their contents. In addition, the AC is responsible for overseeing the effectiveness of the Bank's internal control and risk environment, audit and risk management systems and processes, and may make recommendations or proposals to the Board of Directors as it deems appropriate. It currently consists of three board members who do not have executive functions in the Bank. The AC is chaired by an independent director.

The Board and its committees are responsible for approving the main policies governing the company's activities in order to limit potential negative impacts, promote positive impacts, avoid and mitigate potential risks and take advantage of opportunities. In addition, through the committees that are held regularly, they receive direct updates from the main heads of the risk and compliance functions in relation to these risks and follow up on any actions aimed at their management. The information regularly shared with them includes risk appetite monitoring metrics (ESG risks are integrated into the entity's traditional risks) and operational weaknesses and incidents that may have an impact on sustainability issues.

On the other hand, the Enterprise risk management and compliance framework also approved by the Board supports Wizink's business model, its strategy, objectives and ensures that it avoids negative impacts and risks in sustainability issues. Its core principles include:

- Customer focus - ensuring that the company's activities take into account the impact on customers and conduct issues.
- Linked to business strategy.
- Adhering to risk appetite - in accordance with the approved profile for each risk typology where ESG risks are encompassed.
- Independent oversight - from second line functions to first line areas.
- Business enabler - supporting business decisions being made.
- Proportionality - based on risk level.
- Own people and culture - maintaining motivated and skilled employees.

The following committees support the administrative, management and supervisory bodies in their task of overseeing and managing the company's sustainability issues:

Executive level committees

Executive Committee

Responsible for assisting the CEO in his duties, including, among others, the definition of the annual budget, the development of the strategy approved by the Board, including operational plans, policies, procedures and budgets; approve management proposals on strategic issues that will be recommended to the Board for approval and coordination between the different areas. It is also responsible for ensuring compliance with current regulations and legislation, as well as making recommendations on the Risk Appetite Framework (the 'RAF').

Asset-Liability Committee ('ALCO')

Oversees and grants final approval of management activity risks of structural balance with the objective of maximizing the entity's performance, ensuring that the profile of the level of aggregate risk created by the different business units remains aligned with the Bank's risk appetite. The ALCO is responsible for identifying, managing and controlling balance sheet risks in the performance of the business strategy, by:

- Active monitoring of the liquidity, financing, market risk and capital risk profiles by means of the metrics defined and the early warning indicators (the EWIs);
- Having sufficiently broad representation in those functions that can have a direct or indirect impact on the risk profile;
- Guaranteeing reports disclose accurate, timely and relevant information on the level and sources of risk exposure;
- Approving capital and liquidity plans;
- Forecasting to identify potential breaches of risk appetite or regulatory requirements;
- The execution of stress tests to ensure the resilience of the structure of balances to shocks in structural risks.

Enterprise Risk Management Committee ('ERMC')

Provides the appropriate surveillance and management of all types of risk within the Company in order to guarantee compliance with the RAF (Risk Appetite Framework). The ERMC controls risk appetite-associated breaches and submits recommendations to the ExCo and the RC on risk management matters. Additionally, information is shared on topics identified as material related to sustainability: customers (complaints, conduct issues, data protection, information security, reputation, operational incidents that may impact these topics), own personnel (remuneration policy, whistleblowing policy), and corporate culture (money laundering prevention, corporate conduct).

Product Committee

Approves any new product launch or change in products and/or services commercialized by the Bank and its branch. Guarantees that the Customer Value Proposition meets customers' needs, takes into consideration the competitive and regulatory environment, minimizes and mitigates the legal and conduct risks arising from the design and marketing of the products and ensures an adequate transparency.

Committees specialized in Risk Management (dependent on ERM)

Credit Risk Committee ('CRC')

Monitors all key aspects of credit risk management to understand credit risk appetite, profile, performance and credit policy adequacy. The objective of the Committee is to provide the appropriate oversight and governance of Wizink's credit risk, ensuring adherence to risk appetite and risks management framework. The CRC will provide recommendations to the ERM every time a relevant credit risk needs to be escalated.

Internal Control Body ('OCI') – FinCrime

Committee appointed according to article 26 of Spanish Law 10/2010, of 28 April on the prevention of money laundering and combating the financing of terrorism and article 35 of the Royal Decree 304/2014, dated on May 5, to oversee and manage the financial crime risk and anti-money laundering policy and procedures to be aware, prevent and impede operations linked to money laundering/ financing of terrorism.

Internal Control Body ('OCI') - Criminal Defence

The purpose of this committee is to ensure compliance with the criminal defense regulations, namely, i) Organic Law 5/2010, of 22 June, amending the Organic Law 10/1995, of 23 November, Spanish Criminal Code, ii) Organic Law 1/2015, of 30 March, amending the Organic Law 10/1995, of 23 November, Spanish Criminal Code iii) Circular 1/2016, of 22 January, on the criminal liability of legal entities pursuant to the reform of the Spanish Criminal Code introduced by Organic Law 1/2015, iv) Requirements of the crime prevention management system at AENOR (Spanish standards body) organizations, v) Organic Law 1/2019, of 20 February, amending the Organic Law 10/1995, of 23 November, Spanish Criminal Code.

IT Risk Management Committee ('ITRM')

Monitors all aspects of ICT & Security Risks to understand IT Risk Appetite, profile, performance and control framework adequacy. The purpose of the Committee is to provide the appropriate oversight and governance of Wizink's ICT & Security Risk, ensuring alignment with the ICT & Security Risk Management Policy and related standards. The Committee will provide recommendations to the ERM every time a relevant ICT or Security risk needs to be escalated.

Operational Risk Management Committee ('ORM')

Monitors all aspects of Operational Risk to understand Operational Risk Appetite, profile, performance and control framework adequacy. The purpose of the Committee is to provide the appropriate oversight and governance of Wizink's Operational Risk, ensuring alignment with the Operational Risk Management Policy and related standards and procedures. The Committee will provide recommendations to the ERM every time a relevant operational risk needs to be escalated.

Model Risk Committee

Serves as the primary body for all material matters related to model risk management. The objective of the Committee is to provide the appropriate oversight and governance of Wizink's Model Risk, ensuring adherence to Risk Appetite and Model Risk Policy and related Standards. It will lead an interaction between all key members to discuss/debate main model's statistical indicators & tiering evolution, identification of model weaknesses, the definition and follow up of corrective actions. The Committee will provide recommendations to the ERM every time a relevant model risk needs to be escalated.

1.2.2. Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies (GOV-2)

The Board of Directors and its committees, the Risk Committee, the Audit Committee and the Appointments and Remuneration Committee, periodically review sustainability issues several times a year, in accordance with their agendas. In addition, the CRCO and Compliance Director report to the committees at each meeting on the progress made in their area.

During the financial year 2024, in addition to the regular monitoring of the approved risk metrics and the review and approval of the policies listed below, the various committees have dealt with the incidents, risks and opportunities of the sustainability issues reported in the thematic sections of this Non-Financial and Sustainability Information Statement listed below:

Topic	Subtopic	Discuss in the Governing bodies	Policies renewed and approved in 2024
Own staff	Working conditions		Remuneration policy
	Equal treatment and opportunities for all	<ul style="list-style-type: none"> * Review and approval of new management appointments * Training plan 	
Consumers and end-users	Incidents related to information for consumers or end-users	<ul style="list-style-type: none"> * European DORA (Digital Operational Resilience Act) implementation programme * Compliance with data retention periods * Annual report on the Complaints Service 	<ul style="list-style-type: none"> * Operational Risk Management Policy * Information Technology and Security Risk Management Policy
	Social inclusion of consumers/end-users	<ul style="list-style-type: none"> * Review and update of the minimum payable on the credit card product. * Requirements and implementation of Law 11/2013 on accessibility. * Various action plans for continuous improvement in the clarity and simplicity with which we provide information on products and conditions, to make it easier for our customers to contract the product that best suits their needs. * Changes in the payment conditions of the card product. * Non Performing Loans Report * Moratorium for victims of the DANA (Spanish acronym for 'depresión aislada en niveles altos', meaning upper-level isolated atmospheric depression) 	<ul style="list-style-type: none"> * Model Risk Management Policy * Usury Provision Policy * Customer Commercial Communication Policy
Business conduct	Corporate culture	Prudential Relevance Report	<ul style="list-style-type: none"> * Criminal risk prevention and detection policy * Delegation and Escalation of Risks Policy * Board and Key Personnel Suitability Policy * Pillar III Policy * IFRS Accounting Policy Manual * Stress Test Policy
	Whistleblower protection	Annual report on the functioning of the whistleblowing channel	
	Supplier relationship management, including payment practices	Review of essential service providers	Third Party Selection and Management Policy
	Corruption and bribery	Results of the review by the external money laundering expert	Prevention of money laundering and terrorist financing policy

The administrative, management and supervisory bodies take into account occurrences, risks and opportunities when overseeing the company's strategy, its decisions on significant transactions and its risk management process, through the internal governance mechanisms in place at the Entity. These mechanisms are described in sections 1.2.1. The role of the administrative, management and supervisory bodies (GOV-1), 1.2.5. Risk management and internal controls over sustainability disclosures (GOV-5) and 1.3.3. Material IROs and their interaction with the strategy and business model (SBM-3).

1.2.3. Integration of sustainability-related performance in incentive schemes (GOV-3)

The administrative, management and supervisory bodies of WiZink do not have any type of variable remuneration and therefore do not have incentives on sustainability matters, with the exception of the CEO who is the only executive within the Board of Directors who does have incentives although during 2024 they have not been linked to sustainability.

1.2.4. Statement of due diligence (GOV-4)

In the following table you can find the headings within this Sustainability Report where it is informed how we determine, prevent, mitigate and account for how we address the actual and potential negative impacts on the environment and the people related to our activity, always following the United Nations Guiding Principles and the OECD Guidelines.

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE SUSTAINABILITY STATEMENT
a) Embedding due diligence in governance, strategy and business model	<p>1. GENERAL DISCLOSURES (ESRS 2) : 1.2.1. The role of the administrative, management and supervisory bodies (GOV-1) 1.2.2. Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies (GOV-2) 1.3.1. Strategy, business model and value chain (SBM-1)</p> <p>3.1. OWN WORKFORCE (ESRS S1) : 3.1.2.1. Policies related to own workforce (S1-1)</p> <p>3.2. CONSUMERS AND END-USERS (ESRS S4): 3.2.2.1. Policies related to consumers and end-users (S4-1)</p> <p>4.1. BUSINESS CONDUCT (ESRS G1): 4.1.2.2. Business conduct policies and corporate culture (G1-1) 4.1.2.4. Prevention and detection of corruption and bribery (G1-3)</p>
b) Engaging with affected stakeholders in all key steps of the due diligence	<p>1. INFORMACIÓN GENERAL (NEIS 2): 1.2.1. The role of the administrative, management and supervisory bodies (GOV-1) 1.3.2. Interests and views of stakeholders (SMB-2)</p> <p>3.1. OWN WORKFORCE (ESRS S1) : 3.1.2.2. Processes for engaging with own workers and workers' representatives about (S1-2)</p> <p>3.2. CONSUMERS AND END-USERS (ESRS S4): 3.2.2.2. Processes for engaging with consumers and end-users about impacts (S4-2)</p>
c) Identifying and assessing adverse impacts	<p>1. INFORMACIÓN GENERAL (NEIS 2): 1.3.2. Interests and views of stakeholders (SMB-2) 1.3.3. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) 1.4.1. Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)</p> <p>3.1. OWN WORKFORCE (ESRS S1) : 3.1.1.1. Interests and views of stakeholders (SMB-2) 3.1.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)</p> <p>3.2. CONSUMERS AND END-USERS (ESRS S4): 3.2.1.1. Interests and views of stakeholders (NEIS 2 SMB-2) 3.2.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model (NEIS 2 SBM-3)</p> <p>4.1. BUSINESS CONDUCT (ESRS G1): 4.1.2.1. Description of the process to identify and assess material impacts, risks and opportunities (NEIS 2 iro-1)</p>
d) Taking actions to address those adverse impacts	<p>3.1. OWN WORKFORCE (ESRS S1) : 3.1.2.3. Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3) 3.1.2.4. Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)</p> <p>3.2. CONSUMERS AND END-USERS (ESRS S4): 3.2.2.3. Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3) 3.2.2.4. Taking action on material impacts on consumers and end-users, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S4-4)</p>
e) Tracking the effectiveness of these efforts and communicating	<p>3.1. OWN WORKFORCE (ESRS S1) : 3.1.3. METRICS AND TARGETS</p> <p>3.2. CONSUMERS AND END-USERS (ESRS S4): 3.2.3.1. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)</p> <p>4.1. BUSINESS CONDUCT (ESRS G1): 4.1.3. METRICS AND TARGETS</p>

1.2.5. Risk management and internal controls over sustainability reporting (GOV-5)

Managing and controlling all risks effectively, both those inherent to its business model and those related to sustainability issues, is one of the top priorities for Wizink. The risks identified in terms of sustainability (detailed below in section 1.3.3.) as well as those on the disclosure of information on sustainability, are integrated and managed within the context of the company's traditional risks.

The Board of Directors and Executive Committee actively establish and promote the culture and values for managing risk, which cascade throughout the company, and continuously monitor their integration throughout the organization. Wizink also promotes this culture at all levels with the aim of ensuring that all employees understand the core values of the risk and compliance culture.

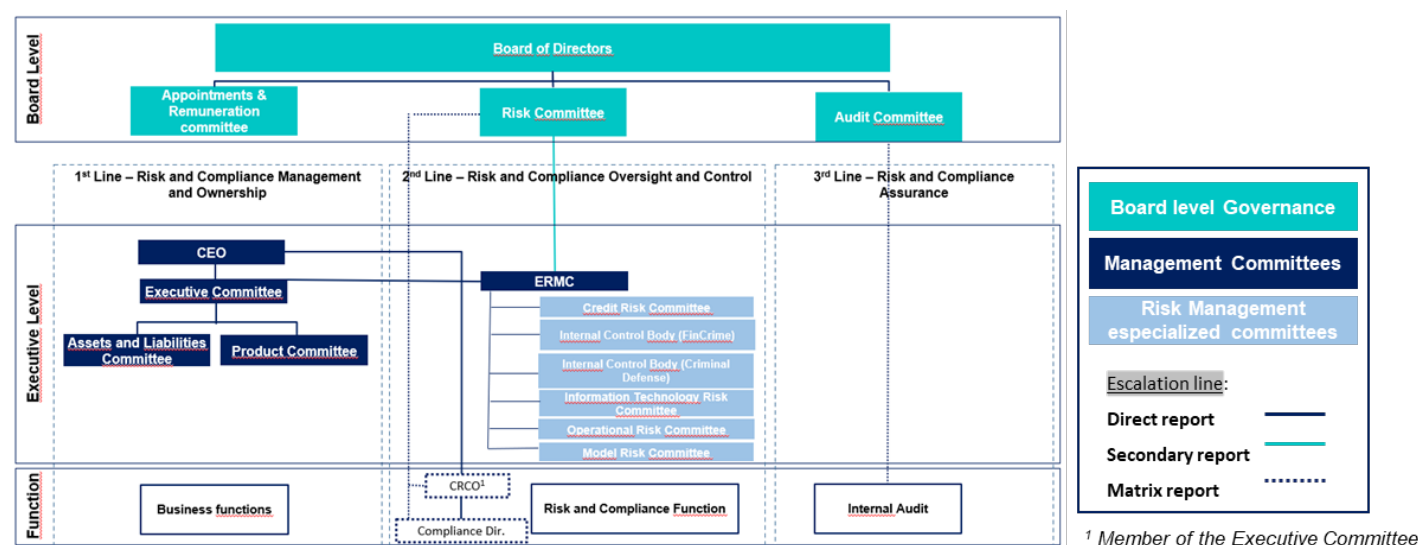
The sustainability disclosure process, like any other report, is subject to potential operational risks related to inaccuracy, error and incompleteness, including potential errors in internal processes and systems, poor data quality, human error or external events.

Wizink's risk management strategy consists of ensuring the identification, measurement, monitoring and control of all relevant risks, with the appropriate human resources, tools and information systems that ensure the maintenance of a prudent risk profile consistent with the established appetite. Specifically, operational risk management at Wizink, where the risks related to the disclosure of sustainability information are included, focuses on maintaining robust operational controls in all its processes, minimizing the possibility of errors and incidents that cause negative impacts on the company.

The sustainability information is prepared by different areas identified as responsible, following calculation protocols that define both the origin of the data and the owners of the data, the calculation methodology and the controls established on these calculations.

Following the operational risk management policy, if risks are identified in the disclosure of this sustainability information, the assessment, mitigation and reporting mechanisms would be activated through the governance structure shown in section 1.2.1 of this document. In the periodic sessions of the Risk Committee, information is reported on operational incidents and risks that have not been sufficiently mitigated. For prioritization purposes, an evaluation and classification based on impact, severity and probability criteria approved within the operational risk management framework is followed, which also involves escalation in the established timeframes and level.

Finally, it should be noted that Wizink follows a risk control and management model based on three lines that interact with the global corporate governance structure, to define risk and compliance management. This model ensures a clear delineation of responsibilities between ownership and management, supervision and control, and ensures their independence. In addition to these three lines, the Board of Directors and the Audit and Risk Committees are responsible for the correct management and control of risks at the highest level of the organization. This model follows the guidelines published by the Basel Committee on Banking Supervision in July 2015 under the title 'Corporate Governance Principles for Banks' and the EBA Guidelines GL/2021/05 on Internal Governance.



1.3. STRATEGY

1.3.1. Strategy, business model and value chain (SBM-1)

Wizink is the leading entity in credit card financing in the Iberian Peninsula that, in recent years, has carried out a strategy to become a diversified and digital consumer financing entity.

Wizink reviews annually the evolution of the strategy and, in FY2024, has established the following three strategic priorities: (i) GROW the Portuguese business in a profitable way, (ii) UP SCALE Aplazame and Lendrock, (iii) OPTIMIZE the Spanish business:

evolución de su estrategia y, en el año 2024, ha establecido tres prioridades estratégicas (i) CRECER de forma rentable el negocio en Portugal, (ii) ESCALAR Aplazame y Lendrock, (iii) OPTIMIZAR el negocio en España



The satisfactory implementation of these three strategic priorities will allow Wizink to develop a digital platform of consumer financing combining the capacities 'B2B' of Wizink and Aplazame.

Sustainability strategy

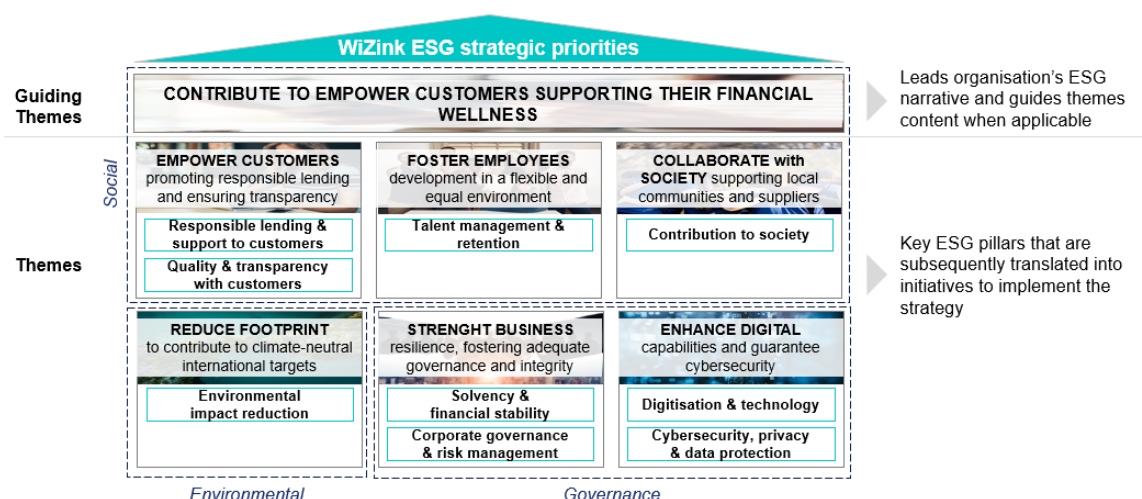
In accordance with its Corporate Strategy, during FY2024 Wizink reviewed its strategy on sustainability. For this purpose, Wizink has taken into account, among other factors, the results of the double materiality analysis.

Wizink considers that all ESG elements are relevant. However, as an entity which specialises in consumer finance which main goal is to boost financial capabilities of people, Wizink considers that it can create more value in social matters and, in particular, in what concerns support to its clients. All this not giving up on contributing to environmental conservation and ensuring adequate governance.

In accordance with the above, the guiding principle of the sustainability strategy of Wizink is 'Contribute to empower clients supporting their financial wellbeing'. As an entity which provides consumer loans Wizink intends to help clients to achieve their vital goals by granting them credit in a responsible and transparent manner and also providing them with tools, so they are able to efficiently manage their finances.

Having established the aforementioned guiding principle, Wizink's sustainability strategy pivots on the following six strategic priorities:

- EMPOWERING CLIENTS promoting responsible credit practices and granting transparency;
- PROMOTING the development of EMPLOYEES in a flexible environment and with equal opportunities for all;
- COLLABORATE with the SOCIETY supporting the development of local collectives;
- REDUCE CARBON FOOTPRINT contributing to comply with the climate goals;
- REINFORCE the resilience of the BUSINESS through an adequate governance; and
- IMPROVE the DIGITAL capabilities and improve cybersecurity.



Business model, value chain and stakeholders

Wizink attracts customers directly ('B2C' model) and through agreements with partners ('B2B2C' model).

Wizink's objective is to provide its customers and partners a personalised diversified and digital lending proposition complemented with savings and insurance products.

The bank has also been evolving from a multi-channel phone-based bank to a digital one. The bank applies this model across all its origination channels, direct channels and partnerships.

The Wizink Group, with headquarters in Madrid, is under the supervision of both Bank of Spain and Bank of Portugal. Wizink is 100% owned by Aneto S.à r.l, (mainly controlled by investor group Värde Partners).

Wizink's corporate policy pivots on four fundamental values: innovation, collaboration, responsibility and execution. Said values operate as an inspiration and a guide for all the organisation, including the Senior Management and are aligned with the sustainability strategy.

Wizink's value chain has been detailed in section 1.1.1. General basis for preparation of sustainability statement (BP1).

Funding

The main source of funding of the Company is retail complemented by wholesale financing, mainly through securitisations. The offer of retail funding includes deposits with different maturities and savings accounts sold through its digital platform both for Wizink clients as well as for the general public.

The sale is managed by an external agency specialised in financial products intermediation in online channels through online applications and deploying digital marketing strategies to attract clients.

Sales of credit products

Wizink offers a series of consumer Finance solutions in order to attract new clients:

Revolving credit cards (Spain and Portugal)

Wizink credit card proposition is based on a credit card linked to the customer existing bank account. Includes flexible payment methods, full payment (100%) or instalments and deferred payment solutions at a fixed interest rate.

The Company has both its own credit cards as well as 'co-brand' credit cards due to executed partnerships. In this case, the design and characteristics of the credit card are personalized in accordance with the agreements reached with each partner. At present Wizink has executed partnerships with Cepsa, RACC y AliExpress in Spain and Cepsa and Benfica in Portugal.

The sales channels are as follows:

- Online: Online application and deployment of online marketing strategies.
- Tele sales: Through the phone and with digital support.
- Stands and direct sale: by means of stands or agents located in specific locations, the application can be made either at the stand or at another time scheduling a meeting with the agent.
- Partnerships: in order to sell co-brand credit cards all or some of the abovementioned channels are used depending on the agreements with the partners. Besides, the partner's own network and Client databases are used in order to promote and sale the card.

In all channels above, the sale is made through specialised agencies which use their own resources and technical infrastructure and its own personnel. Regarding CEPSA and RACC in Spain, sales are also made in CEPSA's gas stations and RACC premises. In this case, the sales are made by the partner's own work force.

Point of sale financing (Spain)

Through its brand Aplazame, online Point of Sale is a platform which provides flexible payments solutions at the point of sale (e.g.: instalments, pay in 4) to provide e-commerce financing solutions.

Aplazame's platform is integrated in the checkout process of the merchants and the credit origination process is 100% online.

Auto loans (Spain)

Through the Lendrock brand, Wizink offers second hand vehicle finance, using a wide base of dealers.

The loan application is fully% digital with the commercial support of the dealers.

Personal loans (Spain and Portugal)

Wizink launched its personal loans offer to the market in Spain and Portugal in Q4 2021 and Q1 2022 respectively, with value proposition that aims to cover all customer needs (personal, eco, learning, refurbishment, holiday).

During 2024, Wizink halted the commercialization of this business segment while it redefines its strategy to be followed in the future.

Cross sales

Once clients are part of the Group, Wizink offers certain other financial solutions that could fit the customer profile and its needs through the deployment of a series of cross sales actions.

Currently, the following actions are deployed:

- Credit card clients

Wizink manages the customer relationship proactively offering different financial solutions linked to the available balance of the credit card (including increases of the credit limit based on both the profile and the needs of the customers). These products can be purchased on the phone by either external agencies or Wizink employees or online (web and app).

Wizink also offers insurance, among which the most popular is the payment protection insurance in order to insure the payment of the credit card monthly billings.

- Point of sale financing

Wizink offers credit cards to certain clients who have acquired point of sale financing with Aplazame. For this purpose, Wizink has launched a 'co-brand' credit card with Aplazame adapted to the needs and preferences of clients of such business segment.

Service

Wizink clients have at their disposal several channels in order to perform any operation or consultation related to their financial products:

- Digital channels: web and app
- Telephone
- Email or postal address

Either customer care agencies or Wizink employees will be attending and answering queries from customers.

Collections

Wizink proactively manages recoveries and collections, either through agencies or its own personnel, including offering restructuring or refinancing solutions to clients who may be experiencing financial troubles.

This is carried out by both, agencies specialized in recoveries and Wizink employees.

Wizink relies in a series of providers which provide technology and operational services in order for Wizink to execute and deliver at any point in its value chain including maintenance of its information technology systems, operational processes and its premises. These suppliers are part of Wizink's value chain.

Further, as it has been said already for several value chain phases such as sale of financial products, customer care or collections, Wizink has executed agreements with agencies, partners and merchants which are also part of its value chain.

As it is thoroughly described in section 4.1.3.3. Management of relationship with suppliers (G1-2), Wizink has a policy for managing purchases and suppliers which objective is to set guidelines to select and manage suppliers so there are adequate controls in order to protect the Company's assets, its reputation and its own and its client's interests making sure that there also are controls over social and environmental matters. This policy applies to all suppliers, agencies, partners and merchants mentioned above.

Additionally, we include the information on profit from the segments identified by the Group in Note 40 of the Consolidated Financial Statements (Segment reporting).

Finally, the details of employees by geographical area can be found in section 3.1.3.2 Characteristics of the employees (S1-6) of this report.

1.3.2. Interests and views of stakeholders

Stakeholders are those who can impact or be significantly impacted, positively or negatively, by the activities of Wizink.

In the table below the stakeholders impacted by Wizink are detailed indicating the main forms of interaction and the phases in the value chain in which they intervene.

Stakeholder	Description	Interaction with Wizink	Value chain phase
Shareholders and investors	Share and debt holders in Teide (ultimate parent company of Wizink) and investors in securitisations or in any other fixed income issuance.	Wizink periodically reports information to his investors and debt holders, meet with them and attend their queries.	Funding
Regulators	Bank of Spain and Bank of Portugal as supervisors in each of the jurisdictions where the company operates.	As a regulated entity, Wizink periodically reports information to regulators and interacts frequently with them.	All in their supervisory capacity
Board members	Board members of Wizink.	Formal sessions of the Board and its respective commissions.	All phases, as they take decision on Wizink's activity

Stakeholder	Description	Interaction with Wizink	Value chain phase
Senior management	Members of Wizink 's executive committee.	Completely involved in managing the day to day operations and decision making of the company.	All phases, as they take decision on Wizink 's activity
Employees	Employees of the different companies in the Group	Essential part in the day to day operations of the company. Employees have several channels through which to express themselves and make suggestions.	All phases, they are main actors.
Suppliers	Companies which supply Wizink with either good or services.	Frequent interactions plus specific sessions to follow up and continue improvement.	All phases are supported at different level by suppliers
Partners and merchants	Companies with which Wizink has strategic distribution agreements (i.e. co-brand credit cards), insurance companies, merchants and and auto dealers.	Frequent interactions to follow up and improve agreements and collaborations.	<ul style="list-style-type: none"> • Sale of financial instruments (Cross sale).
Clients	People that already have any product issued by Wizink.	They have at their disposal several channels in order to engage with Wizink. Besides, the entity guarantees periodically customer satisfaction surveys and educational initiatives for their clients.	All phases as there is always interaction with clients.
Consumers	People that may buy any of the financial products offered by Wizink.	Wizink undertakes several actions in order to market its brand to the consumers as well as market research and educational actions.	<ul style="list-style-type: none"> • Funding. • Sale of financial instruments.

Besides the recurrent interaction ways described in the table above as indicated in the next section: 'Material IROs and their interaction with strategy and business model' Wizink made a survey which served as the source of information for its double materiality analysis, by which it consulted all its stakeholders with the exception of the Regulator.

Lastly, it is relevant to point out that the Company has not modified and expects no modification of its strategy or business model in order to adapt to the interest or opinions of its stakeholders as this was not necessary. In the event of any divergence from the stakeholder's interest and opinions from the existing ones, the company will evaluate the need for any such changes.

1.3.3. Material IROs and their interaction with strategy and business model (SBM-3)

In 2024, Wizink performed an analysis in order to determine the materiality regarding the following topics: environmental, social and governance. This analysis has been performed from a double materiality perspective:

- Impact materiality: impact or potential impact of Wizink 's activity in the environment or the society;
- Financial materiality: impact or potential impact of the sustainability questions in the financial results of the company.

Methodologically, the main difference with respect to the previous analyses carried out in previous years have been the identification of impacts, risks and opportunities (IROs). For analysing double materiality, the following steps were taken:

1. Identification of impacts, risks and opportunities (IROs)
2. Evaluation of impact materiality of positive and negative impacts.
3. Evaluation of financial materiality of risks and opportunities.
4. Results of the double materiality assessment.

The analysis has been performed by using internal and external sources of information and taking into account the opinions and interests of the stakeholders provided that said stakeholders intervene in different phases of the value chain. Hence, the consultation of the opinion and interest of stakeholders has been the manner in which Wizink has taken into account the information on its value chain when performing this analysis.

As a result of said analysis, the following matrix of material topics, subtopics and sub-sub-topics has been obtained:

Topical ESRS	Sustainability matters covered in topical ESRS		
	Topic	Subtopic	Sub-sub-topics
S1	Own workforce	Working conditions	Working time Adequate wages Work-life balance Health and safety
		Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value Training and skills developments Employment and inclusion of persons with disabilities Diversity
S4	Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy Access to (quality) information
		Social inclusion of consumers and/or end-users	Non-discrimination Access to products and services Responsible marketing practices
G1	Business conduct	Corporate culture	N/A
		Protection of whistle-blowers	N/A
		Management of relationships with suppliers including payment practices	N/A
		Corruption and bribery	Prevention and detection including training

In accordance with the double materiality approach, a topic is deemed to be material both if it is material from the perspective of its impact and also if it is material from the perspective of its financial materiality.

As it can be seen in the table above, the company has identified 3 material topics of the 10 detailed in paragraph AR16 of ESRS 1. Additionally, 8 sub-topics and 17 sub-sub topics have been considered material from the 37 and 90 respectively contemplated by said article of ESRS 1.

The results of the materiality analysis are taken into account when defining the sustainability strategy of the company. Thus, Wizink a consumer financial institution which target is to enhance the financial capabilities of people, considers that it can bring a distinctive added value in the social aspects mainly, in particular, deploying initiatives in order to support its clients. All this without disregarding the environmental issues and also an adequate governance.

In sections 3.1.1.2 and 3.2.1.2 of this document the IROs related with 'Own personnel' and 'Consumers and end-users' have been described. On the other hand, these will be the material IROs related to the Governance topic (ESRS G1):

Sub-topic 'Corporate culture':

- Positive impact (real): The company has implemented adequate practices in terms of corporate governance and Risk mitigation benefiting clients, employees and suppliers.
- Negative impact (potential): The company may harm clients, employees or suppliers due to inadequate management of risks and corporate governance.

- Risks: Potential sanctions because of noncompliance with standards of corporate governance and also potential financial losses arising from inadequate Risk management practices.
- Opportunities: Improvement of the performance of the business thanks to an adequate Risk Management practices and best practices on corporate governance.

Sub-topic 'Protection of whistle-blowers':

- Positive impact (real): The company has implemented mechanisms and tools in order to be able to denounce unethical behaviour in the company.
- Negative impact (potential): There could exist unethical behaviours regarding clients, employees and suppliers or any other stakeholder due to failures in the prevention mechanisms and tools.
- Risks: Potential sanctions or litigation because of non-ethical behaviour.
- Opportunities: Wizink improves its valuation by clients, employees and suppliers thanks to promoting ethical behaviour.

Sub-topic 'Management of relationships with suppliers including payment practices':

- Positive impact (real): The company has a selection and management policy regarding suppliers in order to guarantee some adequate standards in accordance with the rules and regulations on ESG topics.
- Negative impact (potential): The company may harm the environment or the society because of engaging with suppliers, partners or merchants that do not comply with the sustainability standards or use inadequate payment practices.
- Risks: An insufficient or inadequate Risk Management of third parties may entail legal implication or a discontinuation of the company's services.
- Opportunities: Maintaining responsible practices with suppliers allows Wizink to enhance the relationship with its suppliers creating long and fruitful relationships.

Sub-topic 'Corruption and bribery':

- Sub-subtopic 'prevention and detection including training':
 - Positive impact (real): Regarding the fight against corruption and bribery, the company continually works in order to maintain a robust compliance culture through the promotion of responsible financial principles. The company has several tools and policies in order to guarantee the fight against corruption, bribery and money laundry.
 - Negative impact (potential): Not maintaining a robust policy against corruption and bribery could increase social inequality, distort the economic development and erode the confidence in the institutions.
 - Risks: Potential sanctions due to the company not being able to prevent or detect corruption and bribery.
 - Opportunities: Maintenance of solid practices and control regarding corruption and bribery will help enhance the reputation of the Company.

Wizink determines the effects of material IROs and in the following sections and mitigates said IROs through establishing policies and goals taking into account its horizon, severity and probability of occurrence.

Regarding the actual financial impacts derived from the aforementioned material risks and opportunities there are not any material impacts in the company's financial statements.

Finally, as mentioned in section 1.3.1. above, and based on the aforementioned IROs the guiding principle of the sustainability strategy of Wizink is 'Contribute empowering clients supporting its financial wellbeing'. As an entity which provides consumer loans Wizink intends to help clients to achieve their vital goals by granting them credit in a responsible and transparent manner and also providing them with tools, so they are able to efficiently manage their finances.

1.4. IMPACT, RISK AND OPPORTUNITY MANAGEMENT

1.4.1. Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)

As we have indicated in the previous section, the methodology used to carry out the double materiality analysis consists of 4 phases:

1. Identification of impacts, risks and opportunities (IROs)
2. Evaluation of impact materiality of positive and negative impacts.

3. Evaluation of financial materiality of risks and opportunities.
4. Results of the double materiality assessment.

Next, we will develop each of the four phases mentioned above:

1. Identification of impacts, risks and opportunities (IROs)

Firstly, the list of topics detailed in NEIS 1 paragraph AR 16 has been reviewed, identifying impacts, risks and opportunities from the following internal sources:

- Materiality analysis of previous years;
- Strategy, business model and priorities of the entity; and
- Executive Committee and relevant teams of the entity.

External:

- Existing regulation;
- Interested parties external to the company;
- Analysis of market trends; and
- Comparative reference analysis of material topics published by Spanish banking entities.

For each sub-subtopic contained in paragraph AR16 of NEIS 1, the company has identified IROs in light of its business model in the different geographies where the group operates, its commercial relationships and its upstream and downstream value chain. These will be described in each of the corresponding sections of this report related to each topic.

In the task of identification and subsequent evaluation of IROs, the relevant areas of Wizink for each topic, members of the Executive Committee and the Board of Directors of the entity and other interested parties identified by the company and described previously in the section 'Interests and opinions of interested parties' have been involved.

2. Evaluation of the impact materiality of the impacts

Starting from the list of positive and negative, real and potential impacts mentioned above, the materiality of the impact of each of them is evaluated.

The impact materiality evaluation model is summarized in the following table:

	Severity				Impact materiality			Double Materiality
	Magnitude	Scope	Irremediable character	Severity	Severity	Probability	Impact materiality	
Positive impact (real)	A	B	N/A	$D = A+B$	D	100%	$F = D$	$G = D+F$
Positive impact (potential)	A	B	N/A	$D = A+B$	D	X%	$F = D \cdot X\%$	$G = D+F$
Negative impact (real)	A	B	C	$D = A+B+C$	D	100%	$F = D$	$G = D+F$
Negative impact (potential)	A	B	C	$D = A+B+C$	D	X%	$F = D \cdot X\%$	$G = D+F$

It is important to note that, for those impacts related to human rights, severity prevails over probability.

Magnitude

Magnitude represents the level of relevance attributed to each impact by Wizink stakeholders.

The consultation was carried out through an online survey to the stakeholders listed below, together with the number of responses received:

- Shareholders and investors: 7
- Board members: 2
- Senior Management: 6
- Employees: 156 (Spain and Portugal)
- Suppliers: 78 (Spain and Portugal)
- Partners and merchants: 22 (Spain and Portugal)
- Clients: 406 (Spain and Portugal to clients of Wizink, Aplazame and Lendrock)
- Consumers: 414 (Spain and Portugal)

In the case of the Regulators, their opinion has been obtained based on the interactions that Wizink has with them on a recurring basis.

Scope

The scope indicates the perimeter of the repercussions of each impact and how widespread it is. Therefore, it is determined qualitatively based on the following two variables:

- Impact on stakeholders: determination as to whether the impact affects a small or large number of interest groups.
- Extension: determination of whether the impact affects only Wizink internally, its value chain or society or the environment in general.

Irremediable character

The irremediable nature is defined as the ability to recover and restore the situation after the occurrence of a negative impact.

It is assessed qualitatively based on whether Wizink can carry out measures to fully restore the impact or if it would not be possible to restore the situation.

Probability

Probability applies only to potential impacts. It is determined qualitatively on a scale that includes the following classifications: remote, unlikely, possible, probable and very probable.

The probability is evaluated in three-time horizons (short, medium and long term), subsequently combining the classification of each horizon.

3. Evaluation of the financial materiality of risks and opportunities

Based on the list of risks and opportunities mentioned in the previous point, the financial materiality of each of them is evaluated.

Each risk and opportunity is evaluated in three time horizons (short, medium and long term), to then determine the financial impact and probability of each of them and, finally, the financial materiality.

For the aggregate calculation for each risk and opportunity, the results of the scores obtained for each of the three time horizons are combined.

Financial impact

The financial impact represents the economic magnitude that the risk or opportunity may have on the company's financial situation. It is determined qualitatively on a scale that includes the following cases: high, medium and low, taking into account quantitative financial information as support for said estimate when possible and in cases where it applies.

Probability

The probability is determined in the manner mentioned above based on the estimated probability that the risk or opportunity will materialize within the corresponding time frame.

4. Results of the double materiality analysis

Then:

- Impact materiality: sum of the score obtained for the positive and negative impacts associated with each topic.
- Financial materiality: sum of the scores obtained for the risks and opportunities associated with each topic.

Once the above is defined, the company sets a cut-off score above which the topics are considered material.

Finally, it is important to point out that the process to determine, evaluate and manage incidents and risks is integrated both into the company's overall risk management process, and is used to evaluate the company's overall risk profile and risk management processes, and in the company's overall management process.

1.1.3 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

All the disclosure requirements established in the NEIS that are addressed in this Sustainability Report, along with the page where they can be found, are listed in the table of contents at the beginning of this document.

On the other hand, after reviewing the list of data points included in cross-cutting standards and thematic standards derived from other EU legislation under Appendix B NEIS 2, it has been concluded that none of them are applicable to us.

2. ENVIRONMENTAL INFORMATION

Wizink is committed to the transition towards a sustainable economy and limiting global warming to 1.5°C in line with the Paris Agreement, with the goal of achieving climate neutrality by 2050.

2.1 Disclosures pursuant to Article 8 of Regulation EU 2020/852 (Taxonomy Delegated Act)

Article 8 of the taxonomy regulation (Regulation (EU) 2020/852 of the European Parliament and of the Council, of June 18, 2020), requires entities to disclose the manner and extent to which their activities are associated with economic activities classified as environmentally sustainable.

The European Taxonomy is a classification of economic activities that contribute to achieving the 6 environmental objectives of the European Union:

1. Climate Change Mitigation
2. Climate Change Adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

This list of activities allows investors to know objectively whether an activity contributes to the EU's sustainability goals and therefore to have objective and comparable criteria in this respect when making investment decisions.

In 2021 and 2022, Wizink published the eligibility ratio showing the proportion of balance sheet activities that are among the activities included in the European Taxonomy for the first two environmental objectives, but without determining whether they are aligned.

In 2023 and 2024, financial institutions must publish for the first time the Green Asset Ratio (GAR) for the first two objectives and the eligibility ratio of the four remaining four objectives. To be considered aligned, an activity must meet the specific requirements established in the Taxonomy, ensure that it does not cause significant harm to the other environmental objectives, guarantee that the activity substantially contributes to at least one of the six environmental objectives identified by the regulation, and comply with minimum legal safeguards.

Wizink is currently unable to report assets aligned with the taxonomy for the first two environmental objectives (Climate Change Mitigation and Climate Change Adaptation) as a consequence of information limitations due to the potential lack of comprehensiveness of the information received from clients justifying the purpose of the credit.

The only products in Wizink's portfolio related to eligible activities are auto loans (second-hand cars financing), Eco loans (renewable energy financing) and Reforma loans (housing rehabilitation financing). In its personal loans business, Wizink does not currently collect documental evidence that the loan is used for the intended purpose, hence it is not possible to justify the alignment.

The proportion of covered assets financing sectors belonging to the Taxonomy out of the entity's total assets is 8.17% in terms of stock and 3,76% in terms of flow.

Therefore, Wizink's coverage ratios are currently low. This is because most of the balance sheet is still composed of its credit card business, which are assets not covered by the Taxonomy. As Wizink continues progressing in its diversification strategy, described in section 3.3 Objectives and Strategy, and growing its lending business, these ratios will increase.

For the calculation of the indicators reported in this section, a procedure has been followed consisting of the application of the definitions, scope and methodologies established in the Taxonomy Regulation, carrying out the relevant validation and control procedures, and in particular reviewing the consistency with the information reported in the Annual Accounts.

In compliance with the applicable regulations, specifically Delegated Regulations (EU) 2020/852, 2021/2178, and their subsequent amendments, Wizink Bank, as a credit institution, would be required to report key performance indicators related to the European Taxonomy based on turnover and CapEx. However, given that Wizink Bank's specific business model is primarily focused on issuing credit cards and financial products without significant activity in tangible assets or relevant physical investments that generate CapEx, it has been considered that the CapEx-based indicator is not representative, taking into account the specificity of the business model and the principle of proportionality and relevance established in the aforementioned Delegated Regulations. Consequently, the tables indicated in Annex VI of Delegated Regulation (EU) 2023/2486 have been reported solely based on turnover, thus ensuring clear and transparent disclosure, adjusted to the bank's operational characteristics.

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

			Total environmentally sustainable assets (Turnover)	Total environmentally sustainable assets (Capex)	KPI (Turnover)	KPI (CapEx)	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI		Gren asset ratio (GAR) stock					8.17%	67.79%	24.04%
			Total environmentally sustainable assets (Turnover)	Total environmentally sustainable assets (Capex)	KPI (Turnover)	KPI (CapEx)	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs		GAR (flow)					3.76%	0.00%	0.00%
		Trading book							
		Financial guarantees							
		Assets under management							
		Fees and commissions income							

1. Assets for the calculation of GAR

The table detailed on the following page includes:

- **Covered assets in both numerator and denominator:** The entire financing portfolio is made up of individuals. Wizink does not provide financing to companies. Nor does it provide loans with mortgage collateral. Out of the loans offered by Wizink, only the Eco and Reforma loans (building renovation loans line) and the auto loans in the corresponding line fit the requirements of this section.
- **Assets excluded from the numerator for GAR calculation (covered in the denominator):** In regards of the investment portfolio, all the fixed income corresponds to public debt (Spanish, Portuguese and Italian Treasury), treasuries from the Lisboa Metropolitano and Administrador de Infraestructuras Ferroviarias (ADIF) and public administrations (Xunta de Galicia). On the other hand, equities are concentrated in 8 portfolios, all of them of companies whose main business is not related to eligible activities.
- **Assets not covered for GAR calculation:** The public debt described in the previous section and the cash and cash balances in central banks and other demand deposits, both in Spain and Portugal, have been considered. Investment in bonds issued by sovereign or supranational issuers has also been included. Wizink's exposure to derivative operations is determined by the need to hedge investments that are linked to the current investment policy (Liquid Asset Buffer (LAB) Standard) that establishes minimum investment criteria. The maximum investment term is 5 years, with a high credit quality (with a weighting of less than 50% in terms of risk-weighted assets), eligible for the European Central Bank and highly liquid (according to the highly liquid asset criteria-HQLA). Investments, especially long-term ones, can generate greater exposure to interest rate risk. Therefore, to comply with the current Risk Appetite at all times, Wizink may use derivative instruments to hedge and maintain the interest rate risk of the investment portfolio at appropriate levels. The line of other assets mainly includes Wizink's credit card portfolio, in addition to other assets that do not fit into any of the other lines in the table.
- **Off-balance sheet exposures:** Wizink does not have the type of off-balance sheet exposures required in these lines.

The table corresponding to 31 December 2024 and 2023 is detailed below in line with the points mentioned above:

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
Million euros	Total [gross] carrying amount	31 december 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR - Covered assets in both numerator and denominator														
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	332	332												
2 Financial undertakings														
3 Credit institutions														
4 Loans and advances														
5 Debt securities, including UoP														
6 Equity instruments														
7 Other financial corporations														
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including UoP														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including UoP														
15 Equity instruments														
16 of which insurance undertakings														
17 Loans and advances														
18 Debt securities, including UoP														
19 Equity instruments														
20 Non-financial undertakings														
21 Loans and advances														
22 Debt securities, including UoP														
23 Equity instruments														

[illegible]

	a	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
Million euros	Total [gross] carrying amount	Circular Economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transactional	Of which enabling
GAR - Covered assets in both numerator and denominator																		
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	332													332				
2 Financial undertakings																		
3 Credit institutions																		
4 Loans and advances																		
5 Debt securities, including UoP																		
6 Equity instruments																		
7 Other financial corporations																		
8 of which investment firms																		
9 Loans and advances																		
10 Debt securities, including UoP																		
11 Equity instruments																		
12 of which management companies																		
13 Loans and advances																		
14 Debt securities, including UoP																		
15 Equity instruments																		
16 of which insurance undertakings																		
17 Loans and advances																		
18 Debt securities, including UoP																		
19 Equity instruments																		
20 Non-financial undertakings																		
21 Loans and advances																		
22 Debt securities, including UoP																		
23 Equity instruments																		

[illegible]

	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
Million euros	Total [gross] carrying amount	31 december 2023												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR - Covered assets in both numerator and denominator														
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	223	223												
2 Financial undertakings														
3 Credit institutions														
4 Loans and advances														
5 Debt securities, including UoP														
6 Equity instruments														
7 Other financial corporations														
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including UoP														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including UoP														
15 Equity instruments														
16 of which insurance undertakings														
17 Loans and advances														
18 Debt securities, including UoP														
19 Equity instruments														
20 Non-financial undertakings														
21 Loans and advances														
22 Debt securities, including UoP														
23 Equity instruments														

24	Households	223	223																
	of which loans collateralised by residential																		
25	immovable property																		
26	of which building renovation loans	24	24																
27	of which motor vehicle loans	199	199																
28	Local governments financing																		
29	Housing financing																		
30	Other local government financing																		
	Collateral obtained by taking possession: residential and commercial immovable properties																		
31	Assets excluded from the numerator for GAR calculation (covered in the denominator)	2,899																	
32	Financial and Non-financial undertakings	2																	
	SMEs and NFCs (other than SMEs) not subject to																		
34	NFRD disclosure obligations																		
35	Loans and advances																		
	of which loans collateralised by commercial																		
36	immovable property																		
37	of which building renovation loans																		
38	Debt securities																		
39	Equity instruments																		
	Non-EU country counterparties not subject to NFRD	2																	
40	disclosure obligations																		
41	Loans and advances																		
42	Debt securities																		
43	Equity instruments	2																	
44	Derivatives	19																	
45	On demand interbank loans																		
46	Cash and cash-related assets	37																	
	Other categories of assets (e.g. Goodwill, commodities etc.)	2,841																	
47	Total GAR assets	3,122	223																
48	Assets not covered for GAR calculation	1,005																	
49	Central governments and Supranational issuers	546																	
50	Central banks exposure	459																	
51	Trading book																		
52	Total assets	4,127	223																
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
53	Financial guarantees																		
54	Assets under management																		
55	Of which debt securities																		
56	Of which equity instruments																		
57																			

	ag	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
Million euros	Total [gross] carrying amount	Circular Economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
GAR - Covered assets in both numerator and denominator																		
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	223													223				
2 Financial undertakings																		
3 Credit institutions																		
4 Loans and advances																		
5 Debt securities, including UoP																		
6 Equity instruments																		
7 Other financial corporations																		
8 of which investment firms																		
9 Loans and advances																		
10 Debt securities, including UoP																		
11 Equity instruments																		
12 of which management companies																		
13 Loans and advances																		
14 Debt securities, including UoP																		
15 Equity instruments																		
16 of which insurance undertakings																		
17 Loans and advances																		
18 Debt securities, including UoP																		
19 Equity instruments																		
20 Non-financial undertakings																		
21 Loans and advances																		
22 Debt securities, including UoP																		
23 Equity instruments																		

24	Households	223												223				
25	of which loans collateralised by residential immovable property																	
26	of which building renovation loans	24												24				
27	of which motor vehicle loans	199												199				
28	Local governments financing																	
29	Housing financing																	
30	Other local government financing																	
31	Collateral obtained by taking possession: residential and commercial immovable properties																	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	2,899												2,899				
33	Financial and Non-financial undertakings	2																
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of which loans collateralised by commercial immovable property																	
37	of which building renovation loans																	
38	Debt securities																	
39	Equity instruments																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2																
41	Loans and advances																	
42	Debt securities																	
43	Equity instruments	2																
44	Derivatives	19																
45	On demand interbank loans																	
46	Cash and cash-related assets	37																
47	Other categories of assets (e.g. Goodwill, commodities etc.)	2,841																
48	Total GAR assets	3,122												223				
49	Assets not covered for GAR calculation	1,005																
50	Central governments and Supranational issuers	546																
51	Central banks exposure	459																
52	Trading book																	
53	Total assets	4,127												223				
54	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																	
55	Financial guarantees																	
56	Assets under management																	
57	Of which debt securities																	
	Of which equity instruments																	

2. GAR sector information (turnover)

In line with the previous section, Wizink has no exposure to companies whose main business is related to eligible activities according to the Taxonomy, therefore the table below is empty:

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
Breakdown by sector - NACE 4 digits level (code and label) (1)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	Mn EUR	Of which environmen tally sustainable (CCM)	Mn EUR	Of which environmen tally sustainable (CCM)	Mn EUR	Of which environmen tally sustainable (CCA)	Mn EUR	Of which environmen tally sustainable (CCA)	Mn EUR	Of which environmen tally sustainable (WTR)	Mn EUR	Of which environmen tally sustainable (WTR)	Mn EUR	Of which environmen tally sustainable (CE)	Mn EUR	Of which environmen tally sustainable (CE)	Mn EUR	Of which environmen tally sustainable (PPC)	Mn EUR	Of which environmen tally sustainable (PPC)	Mn EUR	Of which environmen tally sustainable (BIO)	Mn EUR	Of which environmen tally sustainable (BIO)	Mn EUR	Of which environmen tally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmen tally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1																												
2																												
3																												
4																												
5																												
6																												
7																												
8																												
9																												
10																												
11																												
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40																												
41																												
43																												

3. GAR KPI stock (turnover)

The relevant table for 31 December 2024 and 2023 is detailed below in line with the previous sections:

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31 december 2024																														
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular Economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total assets covered		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																																
1	Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	10.75																									10.75					10.75
2	Financial undertakings																															
3	Credit institutions																															
4	Loans and advances																															
5	Debt securities, including UoP																															
6	Equity instruments																															
7	Other financial corporations																															
8	of which investment firms																															
9	Loans and advances																															
10	Debt securities, including UoP																															
11	Equity instruments																															
12	of which management companies																															
13	Loans and advances																															
14	Debt securities, including UoP																															
15	Equity instruments																															
16	of which insurance undertakings																															
17	Loans and advances																															
18	Debt securities, including UoP																															
19	Equity instruments																															

37

4. GAR KPI flow (turnover)

The relevant table is detailed below in line with the previous sections:

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31 december 2024																														
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular Economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered		
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
	Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation		4.96																									4.96				4.96
2	Financial undertakings																															
3	Credit institutions																															
4	Loans and advances																															
5	Debt securities, including UoP																															
6	Equity instruments																															
7	Other financial corporations																															
8	of which investment firms																															
9	Loans and advances																															
10	Debt securities, including UoP																															
11	Equity instruments																															
12	of which management companies																															
13	Loans and advances																															
14	Debt securities, including UoP																															
15	Equity instruments																															
16	of which insurance undertakings																															
17	Loans and advances																															
18	Debt securities, including UoP																															
19	Equity instruments																															
20	Non-financial undertakings																															
21	Loans and advances																															
22	Debt securities, including UoP																															
23	Equity instruments																															
24	Households		4.96																									4.96				4.96
25	of which loans collateralised by residential immovable property																															
26	of which building renovation loans		0.03																													
27	of which motor vehicle loans		4.92																													
28	Local governments financing																															
29	Housing financing																															
30	Other local government financing																															
Collateral obtained by taking possession: residential and commercial immovable properties																																
31																																
32	Total GAR assets		4.96																									4.96				4.96

5.1. KPI off-balance sheet exposures (turnover)

In line with the section Assets for the calculation of GAR, Wizink does not have the type of off-balance sheet exposures required in this table, therefore it is included empty.

		a	b	c	d	e	f	g	h	i	j	k	l	m
		31 december 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total eligible off-balance-sheet assets)		Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantess (FinGuar KPI)													
2	Assets under management (AuM KPI)													

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		Circular economy (CE)				Pollution (PPC)			Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total eligible off-balance-sheet assets)		Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantess (FinGuar KPI)																	
2	Assets under management (AuM KPI)																	

5.2. KPI off-balance sheet exposures in terms of flow (turnover)

In line with the section Assets for the calculation of GAR, Wizink does not have the type of off-balance sheet exposures required in this table, therefore it is included empty.

		a	b	c	d	e	f	g	h	i	j	k	l	m
		31 december 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total eligible off-balance-sheet assets)		Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantess (FinGuar KPI)													
2	Assets under management (AuM KPI)													

		n	o		p	q	r		s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance-sheet assets)																				
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
			Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling		
1	Financial guarantess (FinGuar KPI)																			
2	Assets under management (AuM KPI)																			

Below are the different tables established in Annex XII of Delegated Regulation (EU) 2022/1214 on the disclosure of eligibility and alignment information for nuclear energy and fossil gas activities:

Row	Nuclear energy related activities	YES/NO
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as	NO
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

2.2 CLIMATE CHANGE (NEIS E1)

2.2.1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities (NEIS 2 IRO-1)

As determined in the material IROs summary table above, 'ESRS E1: Climate change' has been deemed as not material.

From an impact materiality perspective, Wizink is considered to have a limited capacity to materially impact climate both in a positive or negative manner given the geographic extension of its operations, digital nature of the business and business portfolio (consumer finance, mainly credit cards)

Further, from a financial materiality perspective given the nature of the company's business, defined in section 'Strategy, business model and value chain' in this document, it is also considered that the financial impact that the climate change may have is residual both from the perspective of mitigation and also adaptation.

Following, we will have a look at each of the subtopics of the topic 'climate change' in order to point out the reasons for not considering them as material:

- Sub-topic 'Climate change adaptation': the group does not have any material physical Risk and the opportunities are not material either;
- Sub-topic 'Climate change mitigation': as mentioned before in the section on the environmental strategy the company does not have a large impact in respect of the environment and, hence, there are not material IROs. The Group has a portfolio of loans to Finance the purchase of second-hand vehicles (auto loans) which fuel is mainly petrol. However, the weight of this portfolio compared to the whole portfolio of the bank is residual; and
- Sub-topic 'Energy': as mentioned before, Wizink has a limited capacity to materially impact in the environment regarding its consumption of energy for its processes given the size of the company and its geographic extension.

Even though the questions above have not been deemed material from the perspective of this analysis given the particularities of the business model of the entity Wizink aspires to get positive impacts from financing the transition of its clients to a low carbon economy. Said transition will be beneficial in order to reduce the total emissions freed into the atmosphere and so it will contribute positively to comply with the postulates of the Paris Agreement.

3 SOCIAL INFORMATION

3.1 OWN WORKFORCE (ESRS S1)

Wizink employees are a key component of the company's strategy. Therefore, the company strives to foster the commitment of all employees to Wizink's principles, which are based on transparency, integrity, respect and sincerity, collaboration, self-fulfilment, and commitment. Additionally, through various policies and internal control bodies, high standards of compliance with the current legislation applicable in each work area (equality, diversity, work-life balance, occupational risk prevention, etc.) are ensured.

3.1.1 STRATEGY

3.1.1.1 Interests and views of stakeholders (NEIS 2 SBM-2)

As mentioned in the previous section 'Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)', the interests and opinions of the stakeholders have been used when determining the material topics included in the double materiality matrix for FY2024. Hence, said interests and opinions are thoroughly detailed in the next section when we detail the material IROs on this topic.

On the other hand, stakeholders have been duly described in section 1.3.2 of this document 'Interests and opinions of the stakeholders' in the general section dedicated to the company's strategy.

3.1.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model (NEIS 2 SBM-3)

Regarding ESRS S1 on own personnel, the following material IROs have been identified:

Sub-topic 'Working conditions':

- Sub-subtopic 'working time':
 - o Positive impact (real): The entity has implemented a flexible work model, as well as measures to guarantee the safety, health and quality of life of employees.
 - o Negative impact (potential): Employee dissatisfaction could be generated if their expectations regarding flexibility are not met, as well as an increase in employee health problems if the corresponding measures are not met.
 - o Risks: Increase in employee turnover and absenteeism, with the consequent impact on productivity and the entity's cost base, as well as potential litigation or sanctions in cases of accidents or illnesses; and
 - o Opportunities: Increased productivity by having a motivated workforce committed to the Company.
- Sub-subtopic 'adequate wages':
 - o Positive impact (real): The Group has implemented a salary remuneration model that adjusts to the market and respects in all cases what is established in the collective agreement that is applicable in each legal entity, therefore exceeding in all cases the minimum interprofessional salary.
 - o Negative impact (potential): Employee dissatisfaction could be generated if their salary expectations are not met, and even legal problems could arise if remuneration policies do not comply with the provisions of the applicable Collective Agreements.
 - o Risks: Increase in employee turnover and absenteeism, with the consequent impact on productivity and the entity's cost base, as well as potential litigation or sanctions; and
 - o Opportunities: Increased productivity by having a motivated workforce committed to the Company.
- Sub-subtopic 'Work-life balance':
 - o Positive impact (real): The company has implemented a flexible work model, as well as measures to guarantee the safety, health and quality of life of employees.
 - o Negative impact (potential): Generate dissatisfaction in employees if their expectations regarding flexibility are not met, as well as an increase in accidents and employee health problems if the corresponding measures are not met.
 - o Risks: Increase in employee turnover and absenteeism, with the consequent impact on productivity and the entity's cost base, as well as potential litigation or sanctions in cases of accidents or illnesses.
 - o Opportunities: Increased productivity by having a motivated workforce committed to the Company.

- Sub-subtopic 'Health and safety':
 - o Positive impact (real): The company has implemented a flexible work model, as well as measures to guarantee the safety, health and quality of life of employees. In relation to the health and well-being of our teams, the Wizink Commercial Group acts with full responsibility and compliance with all national and international labour standards (European Union legislation and International Labor Organization Conventions signed by Spain and Portugal). Specific measures regarding health and safety at work are included in the different collective agreements applicable to Wizink. In this sense, the Department of Occupational Risk Prevention ensures compliance with the different provisions in this matter. In addition to what has been mentioned above, this department actively works to promote numerous health promotion actions.
 - o Negative impact (potential): Generate dissatisfaction in employees if their expectations regarding health and safety are not met, as well as an increase in accidents and employee health problems if the corresponding measures are not met.
 - o Risks: Increase in employee turnover and absenteeism, with the consequent impact on productivity and the entity's cost base, as well as potential litigation or sanctions in cases of accidents or illnesses.
 - o Opportunities: Increased productivity by having a motivated workforce committed to the Company.

Sub-topic 'Equal treatment and opportunities for all':

- Sub-subtopic 'Gender equality and equal pay for work of equal value':
 - o Positive impact (real): The entity has developed policies and initiatives to promote diversity and equal opportunities in the company.
 - o Negative impact (potential): Generate dissatisfaction in employees and a negative work environment if equality and respect for diversity are not guaranteed.
 - o Risks: Increase in employee turnover and absenteeism, with the consequent impact on productivity and the entity's cost base, as well as potential litigation or sanctions for cases of discrimination.
 - o Opportunities: Increased productivity by having a motivated workforce committed to the Company.
- Sub-topic 'Training and skills development':
 - o Positive impact (real): The entity has developed policies and initiatives to promote the training and professional development of employees.
 - o Negative impact (potential): Generate dissatisfaction in employees if training and development plans do not meet their expectations.
 - o Risks: Increase in employee turnover and absenteeism, with the consequent impact on productivity and the entity's cost base, due to poor employee training and professional development policy.
 - o Opportunities: Increased productivity by having a motivated workforce committed to the Company.
- Sub- topic 'The employment and inclusion of persons with disabilities':
 - o Positive impact (real): The entity has developed policies and initiatives to promote diversity and equal opportunities in the company.
 - o Negative impact (potential): Generate dissatisfaction in employees and a negative work environment if equality and respect for diversity are not guaranteed.
 - o Risks: Potential litigation or sanctions for cases of discrimination and non-compliance with current legislation.
 - o Opportunities: Increased productivity by having a diversified workforce.
- Sub- topic 'Diversity':
 - o Positive impact (real): The company has developed policies and initiatives to promote diversity and equal opportunities in the company.
 - o Negative impact (potential): Employee dissatisfaction and a negative work environment could be generated if equality and respect for diversity are not guaranteed.
 - o Risks: There could be an increase in employee turnover and absenteeism, with the consequent impact on productivity and the entity's cost base, as well as potential litigation or sanctions for cases of discrimination.
 - o Opportunities: Increased productivity by having a motivated workforce committed to the company.

3.1.2 IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

3.1.2.1 Policies related to own workforce (S1-1)

Wizink has established policies to prevent, mitigate, and remedy actual and potential incidents, address risks, and seize opportunities related to its own personnel.

All policies apply to all legal entities of Wizink and cover all activities for which Wizink is responsible, whether it is carried out by Wizink or a third party. In the case of new business incorporations (i.e., the acquisition of a new company/business or a new business line within the bank), the Policies will be progressively implemented for the new business considering a risk-based approach and complying with applicable regulations.

Wizink remains committed to the United Nations Global Compact as part of our ESG strategy. By belonging to this initiative, we reaffirm our commitment to the 'Ten Universal Principles' promoted by the Global Compact, based on respect for human and labor rights, environmental protection, and the fight against corruption.

The policies described below comply with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

Wizink has established a **Code of Conduct** with the aim of promoting ethics, honesty, and professionalism within the company and among its collaborators, developing and maintaining a standard of conduct that is acceptable to the company, its third parties, customers, and Collaborators.

Among the topics covered by the Code of Conduct and related to own personnel are:

- Principle of equality and non-discrimination: Wizink's guiding principle is to maintain a work environment that respects the dignity of all people, avoiding any conduct that violates the fundamental rights protected by the applicable regulations of each country where Wizink operates and the general legal framework. Consequently, Wizink expresses its firm commitment to the principle of guaranteeing real and effective equality of opportunities in access to work and professional promotion. Collaborators will ensure that no situation of discrimination occurs in Wizink based on gender, origin, religion, ideology, association, sexual orientation, marital status, or any other personal or social condition or circumstance.
- Respect for People in Professional Relationships within Wizink: Wizink is committed to ensuring a work environment free from any form of violence and/or harassment, with no place for abusive behavior, intimidation, disrespect, or any form of physical or verbal aggression in professional relationships within the Group.
- Work-life balance: Collaborators will promote a work environment compatible with personal development, facilitating access to measures that allow the reconciliation of professional activity with the needs of personal and family life among team members.
- Collective Rights: One of Wizink's principles is to promote social well-being and job stability. To this end, it maintains a permanent and fluid relationship with trade unions in their role of representing workers, based on mutual respect to foster a climate of dialogue, communication, and transparency. Collaborators will respect all rights of affiliation, unionization, and association, as well as the rights of collective bargaining, internationally recognized, and the activities carried out by representative organizations of workers within the framework of the tasks and responsibilities legally assigned to them.
- Occupational Risk Prevention: Collaborators must always respect the applicable preventive measures in terms of occupational health and safety. They are obliged to know and use the resources provided by Wizink in terms of occupational health and safety and risk prevention and, where appropriate, to ensure that their team members have the necessary training in occupational risk prevention and perform their activities safely.
- Collaborators must use their technical and professional capacity and diligence in the performance of their activities at Wizink, particularly making responsible use of the training resources provided by Wizink to achieve the professional and technical training required for the performance of their activities.

This Policy is approved by the Board of Directors and managed by the Compliance Director.

Wizink has established a Whistleblowing Channel covered under the **Whistleblowing Policy** to ensure confidentiality, proper follow-up and investigation practices, and protection of the Whistleblower, enabling the detection of criminal and unethical conduct. A more detailed description of how this policy is implemented can be found in section 4.1.3.2. Business Conduct Policies and Corporate Culture (G1-1).

Wizink maintains a zero-tolerance policy on bribery, corruption, harassment, and discrimination. However, all companies face the risk that occasional conduct or actions that deliberately violate these rules or are unethical may occur within the organization. A transparent environment, where accountability is expected, is essential to prevent such conduct or to address it when it occurs.

Wizink is also committed to creating and maintaining a work environment where Collaborators are treated with respect, where each employee is assured that they can contribute to this workplace climate and their efforts will be recognized. Therefore, Wizink maintains that neither harassment nor discrimination will be tolerated in the company.

In this regard, Wizink has specific commitments related to the inclusion of people at risk of vulnerability. These commitments are aligned with current Spanish legislation and are detailed below:

1. **Inclusive Employment Programs:** We implement employment programs that promote the hiring of people at risk of social exclusion, including people with disabilities, young people in long-term unemployment, and people over 50 years old.
2. **Universal Accessibility:** We ensure that all our facilities and services are accessible to people with disabilities, complying with accessibility regulations and eliminating architectural and technological barriers.
3. **Collaboration with NGOs and Social Entities:** We collaborate with non-governmental organizations and social entities to develop initiatives that support people at risk of vulnerability, providing resources and financial support.
4. **Non-Discrimination Policies:** We have strict non-discrimination policies that ensure equal opportunities and fair treatment for all our employees and customers, regardless of their socioeconomic status.

Our workplace must be a space free from unwanted and offensive conduct that makes the victim feel threatened, humiliated, ignored, isolated, or harmed in any other way. This conduct is wrong, whether voluntary or involuntary, and is wrong whether it occurs once or repeatedly. This conduct is wrong in all cases, whether it involves physical contact or a gesture, comment, or joke, when directed at Collaborators based on race, religion, nationality, physical appearance, lifestyle, cultural origin, age, disability, or sexual orientation.

This policy is managed by the Compliance Department. The Audit Committee approves the policy and receives all related reports. Likewise, Compliance will inform the Board of Directors about the handling of complaints received through the Whistleblowing Channel when they occur and are serious enough to justify the intervention of this body.

Regarding employee well-being, Wizink maintains **occupational risk prevention policies** and health-related information available to all employees on the bank's intranet: How to Prevent Occupational Risks; How to Act in Case of Work Accidents; Medical Service and other health-related topics. These policies ensure a safe and healthy work environment for all employees.

Also on the bank's intranet, employees have access to all information regarding **Equality Plans**, detailing the different measures to promote work-life balance and equal treatment and opportunities between women and men at Wizink, all in line with current legislation.

Likewise, the entity has developed policies and initiatives to promote the training and professional development of employees. Specifically, the bank covers topics related to Training and Capacity Development under the '**Regulatory Training and Performance Procedure.**'

To ensure that all members of its own personnel receive adequate pay and equal remuneration for work of equal value, Wizink has developed the **Remuneration Policy**.

Wizink is subject to the regulatory requirements on remuneration established in the legislation issued by the European Union and Spain regarding credit institutions. The Remuneration Policy aims to establish the principles and guidelines to be followed for the development, issuance, and maintenance of compensation policies and related practices. It also aims to ensure that our corporate values, strategy, and prudent risk management approach are reflected not only in our culture but also in our remuneration standards.

The Policy is complemented by the following standards: Procedure for the Determination of the Identified Collective; Annual Variable Remuneration; Calculation of the Bonus Pool; and Calculation of Phantom Shares.

This Policy is approved by the Board of Directors and managed by the Chief People Officer.

This document establishes the basis of the applicable remuneration rules and principles, with the aim of establishing a remuneration system compatible with the regulatory framework, business strategy, objectives, values, and long-term interests of Wizink, as well as being aligned with market practices, both European and Spanish.

Remuneration will be compatible with Wizink's long-term business strategy, values, goals, and interests, and will include provisions to avoid conflicts of interest, support the long-term sustainability of Wizink's financial and reputational position, aligning remuneration with the interests of shareholders and long-term value creation.

To achieve this, performance results will be evaluated in relation to short- and long-term goals and objectives, taking into account all present and future risks. This implies fostering behaviour consistent with Wizink's values; aligning goals and objectives and remuneration with the achievement of annual performance goals and objectives, as well as long-term value creation; and offering affordable and adequate remuneration.

Additionally, this Policy takes into account the contribution of remuneration components to driving actions in environmental, social, and governance (ESG) matters to ensure that the business strategy is sustainable and socially responsible.

The policy establishes that the remuneration system must be simple and transparent, understandable, and easy to explain to all Wizink employees. The applicable remuneration rules will be stipulated clearly and concisely, simplifying the descriptions, calculation methods, and applicable remuneration conditions as much as possible.

Likewise, remuneration is established regardless of gender, ethnicity, religion, disability, sexual orientation, age, or any other unfair means of discrimination. This implies rewarding the track record of achievements and responsibility of employees, regardless of the factors listed

3.1.2.2 Processes for engaging with own workers and workers' representatives about impacts (S1-2)

Wizink Group ensures collaboration and dialogue through the staff representatives, designated by the employees of each company within the group and meetings with unions. Additionally, European and national human rights regulations are respected, ensuring that our internal policies are up to date.

Transparency is promoted by providing workers' representatives (RLPT) with information about workforce developments (hires and departures), economic data, and working hours records, as well as any changes in working conditions and benefits (e.g., office changes).

Additionally, quarterly meetings are held with the various works councils, with specific committees or working groups established by subject (Pension Plan Control Commission, Occupational Health and Safety Committee). In these forums, RLPT can raise specific queries or cases that may require a specific study. Extraordinary meetings are also held as necessary to address any requests, changes, or timely information about situations that arise in our work environment.

The Health and Safety Committees are joint participation bodies intended for regular and periodic consultation on the company's actions in risk prevention. Quarterly meetings are held where participation in the development, implementation, and evaluation of the company's risk prevention plans and programs takes place. Each meeting is recorded in minutes signed by the Prevention Delegates and company representatives.

The Pension Plan Control Commissions hold at least two sessions annually to monitor the Plan, applicable regulations, the need to update specifications to comply with applicable regulations, etc. Minutes are drafted, signed, and circulated among commission members (who are representatives of the Participants and the Promoter). The technical specifications of the Pension Plan are freely accessible through the Intranet. Additionally, if any relevant event occurs, it would be communicated to those affected through the Intranet or corporate email. Each participant in the Plan can access information and movements through the managing entity's website.

Throughout the year, various focus groups based on different themes are held to gather opinions and proposals from those who wish to participate. Subsequently, the organization is generally informed about these sessions, the topics discussed, and any new actions taken as a result.

Our Chief People Officer, as the head of the HR department, will ensure that these processes are carried out in accordance with our internal policies, guaranteeing dialogue, transparency, and the immediate and efficient resolution of conflicts that may arise.

To this end, fluid communication is maintained with the company's employees through open channels to collect questions or requests, mainly through the HRBP role, with the possibility of using the Administration mailbox for additional questions, conducting focus groups on various topics, in-person breakfasts with the CEO to obtain precise first-hand information and convey issues, quarterly sessions led by the CEO with the participation of the Executive Committee directed at the entire workforce, psychosocial risk surveys, etc.

The Wizink Group's workforce is the result of the integration of various companies with very different activities and cultures, having developed a corporate culture with well-defined values over the years, generating a sense of involvement and commitment. The Wizink Group comprises Wizink Bank, S.A., Wizink Gestión, S.L., Iberalbión, S.L., and Wizink Bank Portugal Branch. The following collective agreements apply to each of these groups:

- Wizink Bank, S.A.: Banking sector collective agreement
- Wizink Gestión, S.L.: Offices and Desks Collective Agreement of the Community of Madrid and Collective Agreement for Financial Credit Establishments
- Iberalbión, S.L.: Contact Center Collective Agreement
- Wizink Bank Portugal Branch: All employees are covered by the Banking Agreement.

The Wizink Group guarantees social dialogue with workers' representatives, primarily based on collaboration, transparency, and mutual trust. Thus, formal and informal meetings with unions are regularly held whenever requested by either party, and agreements are reached that both parties consider beneficial to employees' interests, improving what is established in current regulations.

3.1.2.3 Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

At Wizink Group, we maintain a zero-tolerance policy towards any form of discrimination and/or harassment, whether it be workplace, sexual, gender-based, or any other type of harassment defined by current legislation. We have an internal protocol that, among other aspects, defines the process for handling these incidents. Employees can activate the protocol through the mailbox [buzon.etico@bakermckenzie.com]. This allows for the necessary measures to be taken, as part of their responsibilities, to ensure a harassment-free work environment in psychosocial terms, not allowing or accepting such conduct.

The procedure is well-defined, governed by the principles of objectivity, confidentiality, and privacy, ensuring the immediate adoption of measures to resolve any such situations.

Thus, the Ethical Mailbox or Whistleblowing Channel allows for the reporting or communication of information related to violations of the Code of Conduct, detected irregularities in the prevention of money laundering and terrorist financing, any breach of the law or Wizink's internal rules, as well as any discriminatory or threatening action, with the possibility of making anonymous reports. Through this Whistleblowing Channel, criminal conduct can be detected, aiming to identify suspicious behavior as early as possible, with the highest guarantee of impartiality and confidentiality.

This Whistleblowing Channel is clearly visible both on Wizink's intranet and public website and is managed by a third party, ensuring the confidentiality of complaints, as Wizink does not have access to the identity of the complainant. This provider monitors the operation of the Whistleblowing Channel and issues semi-annual reports on the number of complaints reported, managed, and ongoing. The Compliance Function evaluates the Whistleblowing Channel at least annually and issues a report.

In some cases, the Whistleblowing Channel functions as an additional or alternative channel to other existing tools, such as direct communication with the Human Resources Department, unions, or the Health and Safety Committee, to initiate a prevention protocol in case of harassment, etc.

Every year, a report is prepared that includes the cases reported by Wizink employees and other reporting individuals (including directors and senior management) through the Whistleblowing Channel.

3.1.2.4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)

Wizink is committed to improving working conditions, as well as the health and well-being of its employees. Therefore, its permanent and fundamental objective is to continuously improve its health and safety policy.

Preventive actions and Wizink's Health and Safety policy are established in the Prevention Plan document, through which the company's preventive activity is integrated into its general management system to ensure the safety and health of workers. The Prevention Plan is published on the intranet and details:

1. Health and Safety Policy
2. Description of preventive activities
3. Objectives and goals

Below are the preventive activities carried out at Wizink during 2024:

Preventive action	WZ BANK	WZ GESTION	WZ BANK suc PORTUGAL	IBERALBION
Delivery of the Annual Program of Preventive Actions 2024	December 2023: Centro Ulises; Centro oficina Zaragoza; Centro Edificio Zaragoza; Centro Tiziano	December 2023: Centro Ulises	N/A	December 2023: Centro Zaragoza
Health and Safety committee Meetings	Centro Ulises/Tiziano: 5 meetings, one per quarter and one extraordinary meeting in Q2 Other centers: N/A	Centro Ulises/Tiziano: 5 meetings, one regular per quarter and two extraordinary in Q1 and Q2.	N/A	Centro Bari: 5 meetings, one per quarter and one extraordinary meeting in Q1.
Safety Inspection (number of inspections)	<ul style="list-style-type: none"> Centro Ulises: 4 Centro oficina Zaragoza: 2 Centro Edificio Zaragoza: 5 Centro Tiziano: 5 	4	1	4
Delivery of Job Information Sheets	Sent in May 2024 to all employees	Sent in May 2024 to all employees	Sent in May 2024 to all employees	
Psychosocial Risk Assessment	<ul style="list-style-type: none"> November 2024 	November 2024		
Environmental Conditions Measurements (number of measurements)	<ul style="list-style-type: none"> Centro Ulises: 4 Centro oficina Zaragoza: 2 Centro Edificio Zaragoza: 4 Centro Tiziano: 3 	3	1	4
Drills	<ul style="list-style-type: none"> Centro Ulises: 13-06-2024 Centro oficina Zaragoza y Edificio Zaragoza: 23-05-2024 Centro Tiziano: enero 2024 	Centro Ulises: 13-06-2024	1211/2024	23-05-2024
Medical examinations conducted	258	19	88	156
Vaccinated in the Vaccination Campaign	100	5	13	32
Delivery of the Annual Report 2024	January 2025	January 2025	N/A	January 2025

In the event that the results of preventive activities reveal any risk situation, Wizink will implement the necessary preventive measures to eliminate, reduce, and control such risks. These preventive measures are included in the document 'Preventive Activity Planning,' where deadlines, responsibilities, and resources, both human and material, necessary for their execution will be established. Wizink will ensure the effective implementation of the preventive measures included in the planning by continuously monitoring it.

Wizink establishes, within the health and safety policy, a Wellness Program, with which it commits to developing an action plan to improve employees' health with initiatives covering the following pillars: physical health, emotional health, nutritional health, and financial health. The objectives of the various campaigns are:

- Involve and raise awareness among employees about the importance of preventing the specific risks of each campaign.
- Promote healthy lifestyle habits and encourage the proposed healthy measures.
- Reduce absenteeism.

During 2024, Wizink Bank, S.A.U., Wizink Gestión, S.L., Wizink Bank Portugal branch, and Iberalbión have carried out the following activities in the 2024 Wellness Program:

FIRST QUARTER: PHYSICAL HEALTH: We take care of your cardiovascular health

Wizink Bank, S.A.U. - Wizink Gestión, S.L. - Wizink Bank suc Portugal

January: Sleep

- Wellness Tip: The Importance of Sleep
- Action: Sleep Challenge: 21 Days to Learn How to Sleep

February: The Importance of Sports

- Wellness Tip: The Importance of Sports
- Action: Theoretical and Practical Training: Physical Activity – Sports are Health
- RUNNERS CLUB: Spring Race of the Community of Madrid

March: Nutrition

- Wellness Tip: Preventing Cardiovascular Risk through Nutrition
- Action: Celebration of March 14th, European Day for the Prevention of Cardiovascular Risk
- Webinar: Emotional Hunger

Iberalbión, S.L.

February:

- Action: 'Healthy Lunch' – fresh fruit in the office from Monday to Thursday
- Theoretical and Practical Training: Physical Activity – Sports are Health
- Announcement of gym discounts near the facilities

March:

- Action:
 - In-person Workshop: 'Women's Health'
 - Healthy Food Contest
 - Webinar: Emotional Hunger

SECOND QUARTER: EMOTIONAL HEALTH: We Take Care of Your Emotional Health

Wizink Bank, S.A.U. - Wizink Gestión, S.L. - Wizink Bank suc Portugal- Iberalbión, S.L.

April: Psycho-emotional Well-being

- Wellness Tip: Psycho-emotional Well-being
- Action: April 18th: World Day for Safety and Health at Work - Quiz Contest
- Webinar: Laughter Therapy
- Blood Donation Campaign
- RUNNERS CLUB: Zurich

Mat: Mindfulness

- Wellness Tip: Benefits of Mindfulness
- Action: Opening of the Relaxation Room (Lactation Room)
- Webinar: MINDFULNESS

June: Gestión del tiempo

- Wellness Tip: Time Management
- Action: Summer Recipe Contest. Prize: Cooking Course
- Webinar: Time Management/Setting Boundaries

Rock'n'Roll Running Series
Madrid 2024

Only Iberalbión:

Action: Bike to Work, to promote commuting by bicycle

THIRD QUARTER: SAFE VACATIONS: Road Safety; Sun Care

Wizink Bank, S.A.U. - Wizink Gestión, S.L. - Wizink Bank suc Portugal- Iberalbión, S.L.

July: Road Safety

Wellness Tip: Road Safety
During Vacations

Agosto: August: Sun Care - Dehydration

September: Back to routine

- Wellness Tip: Tips for Getting Back to Routine
- Webinar: How to Regain Enthusiasm
- Action: Start of Medical Check-up Campaign
- RUNNERS CLUB PT: Corrida do Tejo Lisbon

FOURTH QUARTER: Ergonomics; Winter Road Safety

Wizink Bank, S.A.U. - Wizink Gestión, S.L. - Wizink Bank suc Portugal- Iberalbión, S.L.

October: Wellness Tools to Take Care of Our Mental Health

- Wellness Tip: Wellness Tools to Take Care of Our Mental Health
- Webinar: Perception: Glasses to Focus on Life
- Action: Flu Vaccination Campaign
- RUNNERS CLUB:
 1. Carrera Down Madrid
 2. VIII Race for Financial Education and Inclusion

November: Ergonomics in the Workplace Men's Health – Women's Health

Wellness Tip: Ergonomics in the Workplace

Action: Physio in the Office (2 days – 3 physiotherapists, 15-minute sessions)

Webinar:

1. Men's Emotional Health
2. Menopause

Only Wizink Bank, S.A.- Wizink Gestión, S.L. y Wizink Bank suc Portugal:

Action: Physio in the Office (2 days – Physiotherapy in the Office – 15-minute sessions)

December: Winter Road Safety

- Wellness Tip: Winter Road Safety
- Action: Christmas Recipe Contest
- RUNNERS CLUB: Carrera de las Empresas

Wizink also offers various services to ensure the health of its employees at work. For example, Wizink Bank, S.A.U. provides (i) Medical Assistance Service at its headquarters, (ii) three automatic defibrillators. Additionally, (iii) a free health card from Valora Prevención is offered to benefit from the advice of health specialists with special prices and advantages. There are also (iv) benefits for pregnant women, such as a parking space available from the 20th week of pregnancy. Furthermore, (v) employees have access to fruit baskets distributed on all floors with daily seasonal fruit.

Since 2016, Wizink has been adhering to the Luxembourg Declaration. This adherence signifies the company's commitment to accept and implement the basic objectives of workplace health promotion and to align its strategies with these principles. This implies compliance with occupational risk prevention regulations.

The Health and Safety department conducts the following monitoring:

- Absenteeism: Quarterly monitoring of absenteeism at Wizink with the Mutual Collaborator with Social Security
- Accident Rate: Quarterly monitoring of the accident rate at Wizink
- Health Indicators: Annual monitoring of health indicators provided by the Health Surveillance Service in its Annual Health Surveillance Report and epidemiological study.

Regarding the promotion of employee training and professional development, during the first half of 2024, Wizink reaffirmed its commitment to professional growth and continuous learning through the 'Training Plan 2024,' designed and launched in alignment with business objectives and the training needs of our teams.

Blocks of the Training Plan 2024:

- Wizink Talks: Includes 'My tips' sessions, 'Experts' sessions, and Colleague Experts, facilitating the exchange of knowledge and experiences within the organization.
- Goodhabitz Training Platform: A comprehensive tool to access various courses and educational materials.
- Upskilling (training plan): Includes mandatory regulatory training, as well as technical and specific skills training, all based on the detection of training needs.

This year, two innovative programs have also been launched to enhance leadership: Managers Advanced Programme and Managers Laboratory.

In our constant quest to stay at the forefront of technology and professional development, Wizink has launched a series of initiatives this year to train our employees in the field of Artificial Intelligence (AI). These actions have been designed not only to improve the technical skills of our team but also to foster a continuous learning environment and adaptation to emerging technologies.

Aplazame continues to bet on a mixed approach in its technical training. Here, each employee, in agreement with their manager, has the freedom to define their own development and training actions, in addition to participating in the open training offered by the Company.

In Iberalbion, training actions have focused on:

- Providing employees with financial management skills and office tools.
- Improving emotional management skills and coexistence in the office.
- Offering personal well-being training.

Additionally, training programs have been developed aimed at:

- Preparation of new hires.
- Reinforcement training.
- Implementation of new procedures and processes in the SCCU, Credit Initiation, Fraud-FinCrime, and Operations areas.

Finally, new initiatives have been launched this year to train employees in AI.

At Wizink, we are committed to providing our employees with the tools and knowledge necessary to thrive in their professional careers. This commitment to development and continuous learning is fundamental to our business philosophy and represents a strategic investment in the future of our team.

Additionally, under section 3.1.3. Parameters and Goals, additional information can be found on Wizink's actions in the areas of working time, adequate wages, work-life balance, gender equality and equal pay for equal work, employment and inclusion of people with disabilities, and diversity.

Thanks to the effectiveness of all these measures and activities, the negative impacts and risks identified in the area of Own Personnel are only potential.

3.1.3 METRICS AND TARGETS

3.1.3.1 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

Since the negative incidents, risks, and opportunities related to own personnel are only potential and not real, the entity has not had to establish goals related to these IROs.

3.1.3.2 Characteristics of the employees (S1-6)

As of December 31, 2024, the Wizink Group has 862 employees. Of these, 497 are women (57.7%) and 365 are men (42.3%), maintaining a stable line compared to the previous year. Additionally, 99.7% of Wizink's workforce is on permanent contracts, and 75% of the workforce is between 30 and 50 years old.

In 2024, the Wizink Group reduced its global workforce by 18.83%, from 1,062 employees to 862 employees as of December 31, 2024. This reduction is mainly due to the subrogation that occurred in Iberalbión, S.L., one of the Wizink Group companies, reducing its workforce by 36.96% in January 2024 (from 349 to 220 employees).

The data has been extracted from the application where the company's employee database is maintained, taking as a reference the active employees as of 12/31/2024 and extracting the information according to the categories requested in this section.

The data is presented as the number of people. Below are the main quantitative data related to Wizink's workforce:

Gender	Number of Employees (number of people)
Male	365
Female	497
Other	-
Not informed	-
Total	862

Country	Number of Employees (number of people)
Spain	772
Portugal	90

01/01/2024 - 31/12/2024				
FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees (head count / FTE)				
497	365			862
Number of permanent employees (head count / FTE)				
495	364			859
Number of temporary employees (head count / FTE)				
2	1			3
Number of non-guaranteed hours employees (head count / FTE)				
				0
Number of full-time employees (head count / FTE)				
410	343			753
Number of part-time employees (head count / FTE)				
87	22			109

01/01/2024 - 31/12/2024		
Spain	PORTUGAL	TOTAL
Number of Employees (number of people / EJC)		
772	90	862
Number of permanent Employees (number of people/ EJC)		
769	90	859
Number of temporary Employees (number of people / EJC)		
3	-	3
Number of employees with non-guaranteed hours (number of people / EJC)		
-	-	-
Number of full-time employees (number of people / EJC)		
663	90	753
Number of part-time employees (number of people / EJC)		
109	-	109

In 2024, a total of 242 employees left the company, resulting in a turnover rate of 0.27, relative to the average number of employees in 2024: 907.3.

The total number of employees was calculated based on the workforce as of 31/12/2024.

Regarding the turnover rate, all departures during the period (both voluntary and involuntary) were considered relative to the average number of employees as of 31/12/2024.

Information on employee volumes and distribution can be found in Note 33 of the Financial Statements.

3.1.3.3 Diversity metrics (S1-9)

Wizink Group is fully committed to equal treatment and opportunities between men and women, fostering and promoting policies that favor real gender equality, both in selection processes and at the remuneration and management levels. Furthermore, it intends to continue the current trend of promoting and improving women's access to and retention in employment, enhancing their training level and adaptability to labor market requirements, in order to maintain a balanced presence of women and men in the organization.

Wizink Group considers diversity as one of the company's main values, as well as an instrument for creating value. Therefore, diversity is promoted in all its teams. This encompasses all dimensions, such as age, nationality, experience, and knowledge.

Wizink Group has a balanced representation of men and women in positions of responsibility. For example, the Management Committee consists of 6 women (representing 66.6%) and 3 men (representing 33.3%). Thus, Wizink Group promotes the principles of equality and pay equity to create an environment where there are no differences caused by gender, race, religion, or any other reason unrelated to performance.

Additionally, an environment of zero tolerance for situations of discrimination and/or workplace, sexual, or gender-based harassment is created, promoting respect for work-life balance and shared responsibility. The distribution of employees by age group is as follows:

Age	Total
<30 years	31
Between 30 - 50 years	644
> 50 years	187
Total	862

On the other hand, Grupo Wizink is working on establishing an equality policy in line with the new legislation, with several negotiation processes underway with employee representatives.

Both Iberalbión and Wizink Bank have initiated negotiation processes to update their equality policies. In any case, there are various measures at all levels that promote flexibility and balance between personal and family life, with special attention to situations arising from maternity/paternity leave.

3.1.3.4 Adequate wages (S1-10)

Wizink's Remuneration Policy, last reviewed in 2024, refers to the corporate salary compensation criteria. At Wizink, the provisions of the collective agreement applicable to each legal entity are always respected, thus exceeding the minimum wage in all cases.

3.1.3.5 Social protection (S1-11)

All employees are covered by social protection through public programs or provided benefits against income loss due to illness, unemployment from the moment the employee starts working for the company, work-related injuries and acquired disabilities, parental leave, or retirement.

3.1.3.6 Persons with disabilities (S1-12)

Grupo Wizink has 9 employees with disabilities (1.04%) and works with special employment centers, promoting an accessible, inclusive, and discrimination-free work environment.

Of the total employees with disabilities in our workforce, 77.78% are women and 22.22% are men. For the calculation of these indicators, information was extracted from our payroll application (number of people with disabilities by gender and percentage of disability) and compared with the number of active employees as of 31/12/2024 extracted from the employee database.

Additionally, the company has formalized contracts with special employment centers and actively collaborates with them for the supply of certain services and products, such as the preparation of Christmas gifts or the provision of intermediary services to organize the trips that Wizink employees undertake for their work.

All Wizink workplaces are accessible. Additionally, the specific needs of people with disabilities are taken into account, providing them with the necessary adaptations to work safely, such as parking spaces for employees with mobility issues or pregnant employees. Wizink Group also has a procedure in place whereby, when an employee notifies the need for workplace adaptation, Occupational Risk Prevention/HR validates this need and specifies the necessary requirements for the workplace adaptation (e.g., headrests, height-adjustable desks, among others).

3.1.3.7 Training and skills development metrics (S1-13)

At Wizink, we are committed to employee skills development and training. 100% of the Group's employees who worked at the Company for at least 3 months during 2024 underwent an annual performance evaluation during the last quarter of the year. This evaluation was launched in November for all active employees at that time, excluding 4 employees who did not meet the criteria of having worked at least 3 months during the year.

This means that the performance evaluation was distributed by gender as follows: 57.03% to women and 42.52% to men. These data were obtained by comparing the report of launched evaluations with the list of employees at the time of the evaluation process launch.

The goal-setting process is launched in the first months of the year. Additionally, goals are set throughout the year for newly hired employees. The process includes self-assessment and evaluation phases where both the set goals and the degree of alignment with the behaviours promoted by the company are evaluated.

During 2024, we provided a significant number of training hours: 5,989 hours of training to women and 4,225 hours to men, covering Wizink Bank, Wizink Gestión, Wizink Branch in Portugal, and Iberalbión.

3.1.3.8 Health and safety metrics (S1-14)

At Wizink, the safety and well-being of our employees is an absolute priority. Our health and safety system is designed to provide comprehensive and effective coverage, ensuring that all employees are protected in the performance of their work. Below is the percentage of employees covered by Wizink's health and safety management system:

Company	% Employees	Nº Employees	Health and Safety Management System	Legal regulations
Wizink Bank, S.A.U.	100%	534	<u>In-house Prevention Service:</u> specializing in Safety, Ergonomics, and Psychosociology. <u>External Prevention Service:</u> specializing in Hygiene and Health Surveillance.	Ley 31/ 95 Prevención de Riesgos Laborales
Wizink Gestión, S.L.	100%	70	<u>External Prevention Service:</u> specializing in Safety, Ergonomics and Psychosociology, Hygiene, and Health Surveillance.	Real Decreto 39/97, Reglamento de los Servicios de Prevención
Iberalbión, S.L.	100%	184	<u>External Prevention Service:</u> specializing in Safety, Ergonomics and Psychosociology, Hygiene, and Health Surveillance.	
Wizink Bank suc Portugal	100%	93	<u>External Prevention Service</u>	Ley nº102/2009, Régimen jurídico de promoción de Seguridad y Salud en el Trabajo.

No occupational diseases, health problems, injuries, or work-related deaths occurred during this period.

Below is the breakdown of accidents by legal vehicle and gender:

WORK ACCIDENTS 2024	TOTAL	In itinere	Workplace	Male	Female	With Leave	Without leave
WIZINK BANK, S.A.U.	0	0	0	0	0	0	0
WIZINK GESTIÓN, S.L.	3	3	0	0	3	3	0
WIZINK BANK suc PORTUGAL	0	0	0	0	0	0	0
IBERALBION, S.L.	2	0	2	0	2	0	2
TOTAL	5	3	2	0	5	3	2

Considering that the rate of recordable work accidents refers to the proportion of work-related accidents that must be officially documented and reported, the following table indicates the accident rate taking into account NON in itinere accidents with and without leave:

2024	WIZINK BANK, S.A.U.	WIZINK GESTION, S.L.	WIZINK BANK suc PORTUGAL	IBERALBION, S.L.
Work-related injury rate (*)	0	0	0	6,06

(*) ((number of work-related injuries / number of hours worked) * 1,000,000)

In November 2024, Wizink Bank, S.A.U. conducted the mandatory external audit to comply with Chapter V of the Prevention Services Regulation RD 39/97, which requires companies that carry out preventive activities with their own and external resources to subject their prevention system to the control of an external audit or evaluation.

3.1.3.9 Work-life balance metrics (S1-15)

Wizink Group ensures work-life balance and the equilibrium between family and professional life through a series of measures that provide employees with flexible working hours and an occasional teleworking system. At Wizink Bank, S.A.U., a remote work system has been established that does not exceed 30% of the quarterly established working hours, with each department planning its calendar regarding the days the team can work from home, always ensuring team interaction.

Additionally, all employees have the right to take leave for family reasons. Throughout 2024, 1.39% of women and 2.9% of men requested leave for family reasons. Other companies within Wizink Group, such as Iberalbión, have a teleworking policy that allows employees greater flexibility during periods like summer or Christmas

Additionally, Wizink Bank has other internal flexibility measures such as flexible working hours, whereby employees have the opportunity to work their hours before or after the regular working day, continuously, as long as the area's needs allow it.

Furthermore, Wizink Bank S.A.U. and Wizink Gestión S.L. have had a digital disconnection policy in place since June 2020, aimed at ensuring that employees are aware they can exercise their right to digital disconnection at any time, without this having negative consequences (e.g., in terms of promotion or remuneration) for them.

Additionally, regarding working hours, it should be noted that Wizink Bank applies a summer intensive working day, having reached an agreement in 2018 with employee representatives (Collective Agreement on Working Time Homogenization) whereby certain days at the start of the intensive working day period (from May 23 to 31) are replaced by others that are more attractive to the workforce (e.g., days before long weekends, holidays, non-school days, etc.). The selection of these substitute intensive working days is carried out in consensus with the social partners and formalized in an annual agreement.

In the case of Wizink Gestión, for all employees covered by the Madrid Offices and Desks Collective Agreement, 13 weeks of reduced intensive working hours per year apply, of which at least 4 consecutive weeks will always be in summer.

3.1.3.10 Compensation metrics (pay gap and total compensation) (S1-16)

The pay gap at Wizink in 2024 is 15.16% across all levels and entities combined.

Additionally, if we compare the pay gap by calculating it based on positions of similar value (internal corporate levels), we can observe that, at almost all levels, the pay gap ranges between 2% and 9%, being higher only at 2 levels.

On the other hand, at the highest level within the company, the pay gap significantly favors women.

To calculate the pay gap, the difference between the average pay levels of male and female employees was obtained, expressed as a percentage of the average pay level of male employees.

In this regard, the methodology used is as follows:

- a) it includes the average gross hourly remuneration of all employees; and
- b) it applies the following formula to calculate the gender pay gap:

$$\frac{(\text{Average gross hourly pay level of male employees} - \text{average gross hourly pay level of female employees})}{\text{Average gross hourly pay level of male employees}}$$

$\times 100$

The guiding principle of Wizink is to maintain a work environment that respects the dignity of all individuals, avoiding any conduct that infringes on the fundamental rights protected by the applicable regulations of each country where Wizink operates and the general legal framework. Consequently, Wizink expresses its firm commitment to the principle of ensuring real and effective equality among its professionals. Therefore, collaborators will ensure that no situations of discrimination based on gender, origin, religion, ideology, association, sexual orientation, marital status, or any other personal or social condition or circumstance occur at Wizink.

This is why we have non-discrimination policies that guarantee equal opportunities and fair treatment for all employees.

In this regard, at Wizink, we currently strive and will continue to strive to reduce potential pay disparities through transparent remuneration policies based on objective principles, as described in section '3.1.2.1 Policies related to own personnel (S1-1).'

To this end, we will also continue to focus on conducting audits and maintaining pay records to clarify potential differences, underlying reasons, and establish an action plan for identified cases.

In the current fiscal year, the total annual remuneration ratio has been 9.91%. This figure reflects the ratio between the total annual remuneration of the highest-paid person and the median total annual remuneration of all employees (excluding the highest-paid).

3.1.3.11 Incidents, complaints and severe human rights impacts (S1-17)

Wizink reaffirms its commitment to respecting human rights, even though it does not have a specific policy in this regard. The Wizink Code of Conduct clearly establishes the rules of conduct that include the safeguarding of these fundamental rights and integrates with the organization's ethical values and principles, supported by strong pillars of good corporate governance and professional ethics among our employees. Wizink includes human rights in its corporate risk map.

Wizink maintains zero tolerance for harassment, discrimination, or any violation of human rights. Therefore, the Company has a Whistleblower Channel through which both employees and others who have or have had a relationship with Wizink can report any situation that goes against Wizink's ethical principles or the Code of Conduct, ensuring total confidentiality and anonymity of the whistleblower if requested.

Additionally, Wizink has a specific anti-harassment procedure for all its employees. This allows the necessary measures to be taken, as part of their responsibilities, to ensure a work environment free from psychosocial harassment, not allowing or accepting such conduct. In the case of Iberalbion employees, they have a specifically negotiated procedure for them, in force since February 2019, as part of the Equality Plan.

The objective of the anti-harassment procedure is to establish an alternative action framework in the company, in addition to the Whistleblower Channel of the Ethical Mailbox, available to all employees who detect or are affected by any type of harassment (in any of the forms or aspects defined in the protocol). This way, the necessary steps can be followed quickly and effectively to resolve all situations that may arise, with the utmost confidentiality and discretion, through the adoption of appropriate measures.

During the 2024 fiscal year, no work-related incidents of discrimination based on gender, racial or ethnic origin, nationality, religion or beliefs, disability, age, sexual orientation, or other forms of discrimination, including harassment as a specific form of discrimination, were recorded.

One complaint was received through the Whistleblower Channel, unrelated to this area, and after being evaluated and investigated, it was closed without risk or necessary actions.

Therefore, the total amount of fines, sanctions, and compensation for significant damages as a result of the aforementioned incidents and claims has been zero.

3.2 CONSUMERS AND END-USERS (NEIS S4)

3.2.1 STRATEGY

3.2.1.1 Interests and views of stakeholders (NEIS 2 SBM-2)

As mentioned in the section 'Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)', the interests and opinions of the stakeholders have been used when determining the material topics included in the couple materiality matrix for FY2024. Hence, said interests and opinions are thoroughly detailed in the next section where we detail the material IROs on this topic.

On the other hand, stakeholders have been duly described in section 1.3.2 of this document 'Interests and opinions of the stakeholders' in the general section dedicated to the company's strategy.

3.2.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model (NEIS 2 SBM-3)

Regarding the material sub-subtopics:

Sub-topic 'Information-related impacts for consumers and/or end-users':

- Sub-subtopic 'Privacy':
 - o Positive impact (real): The Company guarantees the security of personal and confidential information of clients and consumers.
 - o Negative impact (potential): There could be unauthorized access to customer and consumer data if there are failures in the protection mechanisms.
 - o Risks: Loss of competitiveness in the market due to insufficient investment in digitalization and modernization of the entity's technology, as well as significant regulatory sanctions.
 - o Opportunities: Increased competitiveness in the market by maintaining safer digital processes for clients and consumers, also avoiding important regulatory sanctions.
- Sub-subtopic 'Access to (quality) information':
 - o Positive impact (real): The Company informs the client in an appropriate manner so that they contract the products and services that best suit their needs and financial capacity.
 - o Negative impact (potential): It could cause clients to become over-indebted or to contract products that are not appropriate to their financial capacity.
 - o Risks: Increase in non-payments resulting from clients' over-indebtedness or the contracting of products not adjusted to their financial capacity. Additionally, potential lawsuits due to lack of transparency in the contracting of the company's products.
 - o Opportunities: By ensuring that clients contract products appropriate to their financial capacity, Wizink has a portfolio with better credit quality.
- Sub-subtopic 'Non-discrimination':
 - o Positive impact (real): The Company contributes to social projects focused on improving the integration of groups in vulnerable situations.
 - o Negative impact (potential): The integration of vulnerable groups may not be achieved if no adequate support is received.
 - o Risks: There could be an increase in the vulnerable population that could have a potential negative impact on the Company's business.
 - o Opportunities: By contributing to society, the Company improves its evaluation by clients and potential clients.
- Sub-subtopic 'Access to products and services':
 - o Positive impact (real): The Company promotes the digitalization of the population as a means to fight against social and financial exclusion. To do this, the company must promote the digitalization and modernization of the entity's technology to provide adequate service to customers, employees, suppliers, partners and merchants.
 - o Negative impact (potential): There could be cases of social and financial exclusion in people who lack digital skills and cannot access certain banking products and services. Providing an inadequate service to clients, consumers, partners or businesses due to not having adequate technology or levels of digitalization.
 - o Risks: Potential sanctions or litigation in case of not providing adequate access to clients and consumers, and/or non-compliance with accessibility regulations.
 - o Opportunities: The Company improves its evaluation by clients and consumers by guaranteeing accessibility in accordance with current regulations.
- Sub-subtopic 'Responsible marketing practices':
 - o Positive impact (real): The Company communicates clearly and simply to increase product awareness and improve customer satisfaction.
 - o Negative impact (potential): This could lead to customers purchasing products without adequate knowledge of their conditions or operation.
 - o Risks: Potential litigation or sanctions due to lack of transparency in communications with clients.
 - o Opportunities: By communicating clearly and transparently, Wizink improves its evaluation by clients and potential clients.

All consumers or end-users that can be materially affected in any way by the company, including the risks related to own operations and value chain through the company's products and services as well as through its business relationships have been included in the scope of disclosure of this report.

As mentioned before all negative impacts have been identified as potential.

3.2.2 IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

3.2.2.1 Policies related to consumers and end-users (S4-1)

Wizink has policies in place to prevent, mitigate and remediate actual and potential incidents, address risks and take advantage of opportunities related to consumers and end users.

All policies apply to all Wizink legal entities and cover all activities for which Wizink is responsible, whether performed by Wizink or a third party. In the case of new business additions (i.e. acquisition of a new company/business or a new line of business within the bank), the Policies will be progressively implemented for the new business considering a risk-based approach and complying with applicable regulation.

In addition, Wizink reaffirms its commitment to respect for human rights, although it does not have a specific policy in this regard. The entity is a member of the United Nations Global Compact and additionally, in recognition of the growing importance of ethical issues, it takes into consideration human rights (not only limited to customers and consumers) in the map of corporate risks.

Information on Wizink's collaboration with consumers and end-users, as well as the measures it offers for the repair of related impacts, including those related to human rights, can be found under the following sections (3.2.2.2. Processes for engaging with consumers and end-users about impacts (S4-2); 3.2.2.3. Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3))

In relation to the established policies related to consumers and end-users, the main ones are reported below:

The main policies related to ensuring the security of personal and confidential information of customers and consumers are the **Security Risk Management and Information and Communication Technology (ICT) Policy** and the **Data Privacy Policy**.

The purpose of the **Data Privacy Policy** is to comply with the provisions of Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. The Wizink Group aims to ensure full compliance with the implementation of the GDPR and the local data protection regulations applicable in each country where Wizink operates.

This Policy is approved by the Board of Directors and is managed by the Data Protection Officer (DPO).

This Policy is based on several procedures (Procedure for Interaction with Data Protection Supervisory Authorities, Status and position of the Data Protection Officer at Wizink, Procedure for Registration of Processing Activities, Privacy Procedure by design and by default, Risk Analysis Procedure and Privacy Impact Assessment) and is related, among others, with: Information Security Standard, Records Management Standard, Third-Party Selection and Management Policy, Alliances Standard, ICT Risk Management and Security Policy, Data Governance Standard, Internal Procedure on Duties and Obligations of Personnel in Data Protection, Internal Procedure in Information Technology Tools, Product Policy, Risk Delegation and Escalation Policy and Code of Conduct.

Any employee or external collaborator of the Data Controllers subject to this policy must contact the DPO to consult or inform the DPO in the following cases:

- When you have any questions or concerns regarding the Processing of Personal Data by any of the Data Controllers subject to this policy.
- When a new Data Processing is to be carried out or an existing one is to be modified, in any case, before the Processing or modification is carried out.
- When you observe any activity that could lead to a breach of the GDPR, national data protection regulations or any related applicable industry regulations.
- When you observe any activity that could lead to a breach of this policy or any other internal regulations related to data protection, applicable to Data Controllers subject to this policy or other internal regulations.
- When you have doubts about the management of ARCO rights or any other type of claim related to the protection of Personal Data.

Privacy and data protection are not only a legal responsibility of the company, but also an ethical duty and are largely in line with Wizink's core business values. Therefore, privacy and data protection compliance is part of our daily business conduct.

A security breach could harm data subjects, including our own customers, as well as having serious consequences for our company, including legal action against the company. There are serious financial penalties from regulatory authorities that can also lead to reputational damage, loss of public trust and loss of trust from our customers.

Failure to comply with this Policy is considered a breach of the employee's employment duties that could result in disciplinary action.

The **Security and Information and Communication Technology (ICT) Risk Management Policy** establishes the principles, governance structure, fundamental parameters and key tools related to the identification, measurement, management, monitoring, control and reporting of Information and Communication Technology (ICT) risks and the Group's Security.

This Policy is approved by the Board of Directors, which is ultimately responsible for managing Wizink's ICT risk, its internal control system and reviewing its effectiveness. The Board of Directors sets Wizink's risk appetite for ICT and security and approves the associated risk strategy, management framework and risk limits, and carries out activities to promote a culture of risk across the organisation. ICT risk governance rests on the ICT Risk Director and is managed by the ITRMC, which feeds directly into the ERM, with a direct line to the Board Risk Committee.

This Policy applies to all Wizink Group Entities. It applies to all hardware and software of the technical infrastructures implemented by Wizink and to the ICT and security risks associated with outsourced infrastructure agreements. When the company enters into ICT agreements with third parties, the final responsibility for compliance with this Policy and all regulatory requirements always rests with Wizink. Therefore, contracts must be formalized that include the supplier's obligations regarding technical, security, and resilience measures, as well as establishing appropriate supervision activities.

Wizink's commitment is to be diligent in supervising external service providers, especially those supporting critical or important functions, through risk assessments to ensure the effectiveness of risk mitigation measures.

As part of the ICT risk management framework, Wizink has developed the following related documents: IT Management Standard; Information security standard; Business Continuity Standard (CoB); Data Governance Standard; Physical security standard; Records management standard; New Business Risk Framework (NBF), included in the Enterprise Risk and Compliance Management Framework; Third-party selection and management policy; Third-Party Services Risk Assessment Standard; ICT risk assessment procedure; and IT System Criticality Assessment Process.

Wizink seeks to increase its competitiveness in the market through the maintenance of safer digital processes for customers and consumers, while also avoiding significant regulatory sanctions. Wizink's Digital Operational Resilience strategy encompasses the organization's ability to build, maintain, and adapt its digital systems and processes to prevent, detect, respond to, and recover from disruptions. This resilience aims to ensure the continuity of critical services, even in the event of cyber threats, technology failures, or other internal or external disruptions.

The main policies related to informing the customer in an appropriate way, so that they contract the products and services that best suit their needs and financial capacity and ensuring clear and simple communication to increase product knowledge and improve customer satisfaction are the **Product Policy** and the **Customer Communication Policy**. Likewise, the **Credit Policy** and the **Model Policy** establish requirements to: avoid defaults derived from the over-indebtedness of customers or the contracting of products not adjusted to their financial capacity; avoid potential lawsuits due to lack of transparency in the contracting of our products and contribute to improving the integration of groups in vulnerable situations.

The objective of the **Product Policy** is to establish the principles for approving the design and marketing of new products and modifications made during the product life cycle, complying with all EBA directives, as well as with the regulations issued in each country where Wizink Bank, S.A.U is present, ensuring that:

1. The design of the product takes into account the real needs of customers and their objectives and interests and avoids inappropriate sales, always taking into account their precise conditions at all times, whether economic, social or other.
2. The needs of customers and the target market are met when launching or changing a product or service and adequate results are obtained for the customer.
3. The design of products or services is carried out in accordance with guidelines of conduct that ensure that we treat customers fairly at the same time that the financial stability of the products or services is guaranteed.
4. The products offered are within the tolerance of the risk framework applied by Wizink and do not increase Wizink's exposure to the risks associated.

5. The Product Committee's governance, guidelines and processes for approving new products and services or changes to an existing product or service is adequate. This Product Committee also establishes controls and monitoring mechanisms in the post-implementation stage. The Product Committee is a delegated committee of the Executive Committee.

The key principles of Wizink's Product Policy in relation to the design of new products and services, and their modification, are the fair treatment of customers, speed, effectiveness, efficiency and coordination between all areas involved in the bank.

This Policy is approved by the Board of Directors and is managed by the Chief Business Officers.

The purpose of the **Customer Communications Policy** is to establish clear Wizink guidelines for Customer Communications, including the legal and conduct requirements associated with these customer communications. It ensures consistency in the way we communicate our services and products in order to deliver good results to clients, protect our market position and comply with all regulatory and information standards and requirements that must be provided to clients.

Communications with the customer will comply with the principles of objectivity, transparency, clarity, legality and adequacy. Therefore, customer communications must be clear, sufficient, objective, not misleading and the promotional nature of the message must be clear and explicit. The minimum content and marketing format will be adjusted in proportion to the nature and complexity of the product or service offered.

This Policy is approved by the Board of Directors and is managed by the Chief Business Officers.

This Policy interacts with the following procedures: Commercial Communication (Spain); Non-commercial communications (Spain); Commercial communication for Portugal (commercial and non-commercial communications); Surveys communication; Social media communications; Public site management communications; Spokesperson Communications; Press release communications; Merchants Commercial communications; and Savings communications specifications.

The principles of the policy will be followed by all areas responsible for developing and communicating any message to customers or potential customers in any of the procedures mentioned above.

The content of the communications establishes the language and vocabulary to be used, and will follow the following guidelines:

- We use plain and specific language in order that customers (or other stakeholders) are able to identify what we are talking about.
- We clearly explain what the costs correspond to and always provide the data to back them up.
- We set examples so that customers understand us better.
- We explain the process clearly, using resources such as lists or bullet points.
- If the benefit is subject to any limitations or conditions, we indicate it at the same level as the benefit.
- Prices will never be part of the small print.

The objective of the **Credit Policy** is to establish the principles, governance structure, fundamental parameters and key tools related to the identification, measurement, management, monitoring, control and reporting of the Wizink Group's Credit Risk. The Wizink Group is obliged to comply with the regulatory requirements defined by the Bank of Spain, the Bank of Portugal and the European Central Bank, as well as with consumer laws and any other applicable laws. Specifically, this document develops the principle of responsible lending and establishes both the criteria for the analysis and allocation of credit, lines implemented by Credit Cards and Loans and the criteria for their maintenance and management, with the understanding that the principles established in the regulations are duly complied with and applied.

Likewise, the Credit Policy establishes the guidelines for the identification and management of vulnerable customers.

This Policy is approved by the Board of Directors and is managed by the Chief Risk & Compliance Officer (CRCO).

This Policy interacts with the following documents: Cards Spain Credit Risk Management Standards; Credit risk management standards of Cards Portugal; Fraud Management Standard; Loans Spain Credit Risk Management Standard; Loans Portugal Credit Risk Management Standard; Aplazame's credit risk and fraud management standards; Aplazame Merchant Standards; Lendrock Auto Loan Credit Risk Management Standard.

The objective of the **Model Policy** is to establish the principles, governance structure, fundamental parameters and key tools related to the identification, measurement, management, monitoring, control and reporting of the Wizink Group's model risk.

This Policy, and the documents linked to it (IFRS 9 Credit Risk Provisions and Hedging Governance Standard; Model Risk Management Standards), establish the principles of action that should serve as a reference in the management and control of Wizink's model risk.

Wizink's model risk classification, assessment, management, control and reporting will apply to all models that have some type of economic impact on Wizink's risk-related decision-making, whether in the management or regulatory field.

The principles of this Policy are aligned with Wizink's strategy, business model, recommendations from supervisory and regulatory bodies, and best practices observed in the market in terms of model risk management:

- Involvement of Senior Management in the approval of material aspects of the models, estimation processes, management and control of the Model Risk framework.
- Model control must be actively managed throughout the entire model lifecycle, from the design phase to the monitoring of their use.
- Recurrent processes for monitoring, reviewing, and validating the models must be established to ensure their validity and effectiveness.
- Prudent risk management of the models must be carried out by aligning them with the Wizink Risk Appetite.
- Wizink must carry out a periodic communication of the status of its Model Risk ensuring transparency, disclosure and coordination between Validation, Internal Audit and Supervisors.
- Model governance and risk management should be set out in a clear and concise manner. Model risk must be fully integrated into Wizink's overall risk management frameworks.
- All models are expected to comply with the latest regulatory requirements, recommendations and guidelines and, where possible, anticipate potential future regulatory developments.
- The accuracy of the model's results should be tested in proportion to their materiality. Wizink must be up to date with new methodologies and analyze the most appropriate ones to be used in each business case and model calculation.
- Methodological processes must be understood and traceable by the areas involved throughout the model cycle. Model documentation should be clear and available to stakeholders.

This Policy is approved by the Board of Directors and is managed by the Chief Risk & Compliance Officer (CRCO).

Wizink has established a **Code of Conduct** with the aim of promoting ethics, honesty and professionalism within the company and among its employees, developing and maintaining a standard of conduct that is acceptable to the company, its third parties, customers and Employees.

Among the topics covered by the Code of Conduct and related to consumers and end users are:

- Regulatory compliance and ethical behavior: Employees must comply with the general provisions (laws, regulations and circulars issued by regulatory bodies) and Wizink's internal policies and procedures that are applicable to their activity.
- Obligation to act in the best interests of Wizink and its clients: Employees, in the exercise of their professional activity, must always act in such a way that their particular interests, those of their family or other persons linked to them, do not prevail over the interests of Wizink or its clients, and they will refrain from using business opportunities of interest to Wizink and that have arisen as a result of their own benefit. of his relationship with it.
- Duty of Confidentiality: Collaborators will be obliged to professional secrecy with respect to the data or information that they know, as a result of the exercise of their professional activity, whether they come from or refer to Wizink, its clients and suppliers, other Collaborators or any other third party.
- Personal Data Protection: Employees must respect the right to privacy and the right to honour of all people whose personal data they have access to as a result of carrying out their activity within Wizink.
- Offer and contracting of products and services: The Collaborators will only offer customers products or services that meet their characteristics and needs. They will also ensure that the client knows and understands their content, benefits, costs and risks before contracting them. In particular, Employees will comply with the following rules of conduct when offering and contracting Wizink's products and services:
 - o They will inform customers objectively and rigorously about the different products and services, explaining all relevant aspects, and informing them of the risks, costs and applicable fees.
 - o The applicable rates or the commercial conditions adopted in each case will apply.
 - o They will avoid contracting products or services for the sole purpose of generating income for the Company without effective interest for the client.
 - o They will not offer advantages or benefits to customers to the detriment of third parties.
 - o They will ensure that the procurement of products or services is carried out in the manner established in the internal procedures.

- They will avoid any conduct in advertising, marketing and sales that may involve deception or lack of relevant information.

This Policy is approved by the Board of Directors and is managed by the Chief Compliance Officer.

In order to identify, assess, manage and mitigate or prevent actual or potential conflicts of interest that may arise in the performance of Wizink's activities, the entity has established the **Conflicts of Interest Standard**. This standard depends on the Code of Conduct and applies to all Wizink legal entities, subsidiaries and branches.

A conflict of interest exists when the impartiality of the Contributors' actions, as defined below, may be compromised in the opinion of a neutral observer and may result in a detriment to the interests of a Wizink or Wizink customer. In the development of the activity carried out by the Entity, it is understood that a conflict of interest can arise from a triple perspective:

- At the level of the Entity: between the different areas or departments of the same.
- At the level of the Entity's Employees: between the interests of the Entity and the particular interests of its Employees (including the members of the Board of Directors) and between the latter.
- At the level of the Entity's customers: between the interests of the Entity and its customers (or potential customers); between the Entity's Employees and its customers; and between the Entity's customers. This category of conflicts could include, but is not limited to, the following:
 - Obtaining an economic benefit (apart from justified costs and expenses) by the Entity to the detriment of the customer, based on its influence on the customer or on the use of information that it does not make available to the customer.
 - Possible conflicts of interest during the sale of a product (receipt of incentives, gifts, etc.).
 - Differentiated treatment between the different clients under equal conditions.

The standard sets out the process to be followed in the event of detection of a conflict of interest, whether actual or potential. On an annual basis, Compliance will report to the Board of Directors on conflicts of interest identified, assessed, managed, mitigated or prevented.

This standard is approved by the ERMC and managed by the Chief Compliance Officer.

Wizink has established a Whistleblowing Channel covered under the Whistleblowing Policy to ensure confidentiality, correct monitoring and investigation practices and protection of the Whistleblower, which enable the detection of criminal and unethical conduct.

Wizink is committed to conducting our business with integrity and honesty and expects all of our employees to maintain the highest standards of Compliance by following its **Code of Conduct**, as well as all company Frameworks and Policies and all applicable regulations.

This policy applies to whistleblowers (employees, shareholders and persons belonging to the management body, any person working under the supervision and direction of contractors, subcontractors and suppliers and any person who publicly discloses information about violations, obtained within the framework of an employment relationship), to achieve the aforementioned purposes. It will also apply to any third party that does business with Wizink or that interacts with its employees in connection with the activities they carry out in the exercise of their functions.

Within the scope of the policy are complaints about the following breaches of Union law relating to the following areas: (i) public procurement; (ii) financial services, products and markets, and prevention of money laundering and terrorist financing; (iii) product safety and compliance; (iv) transport security; (v) environmental protection; (vi) radiation protection and nuclear safety; (vii) food and feed safety, animal health and welfare; (viii) public health; (ix) consumer protection; (x) protection of privacy and personal data, and security of networks and information systems.

This policy is managed by the Compliance Department. The Audit Committee approves the policy and receives all reports related to it. Likewise, Compliance will inform the Board of Directors about the treatment of complaints received through the Complaints Channel when they occur and are serious enough to justify the intervention of this body.

Wizink Bank, S.A.U. has a Customer Service - Complaints where complaints and claims from its customers are attended to and managed, in relation to their interests and legally recognised rights. The **Customer Defence Regulations** regulate the activity of the Customer Service, as well as the procedure for the submission and processing of complaints and claims. The aforementioned Regulation is available to customers on the website www.Wizink.es

The Board of Directors approves these Regulations in order to attend to and resolve the complaints and claims that its customers and users of financial services present to them, related to their legally recognized interests and rights, regulating the requirements, procedures and activity in general that the SAC must observe, with the purpose of

guaranteeing at all times adequate compliance with the regulations on transparency and customer service of the financial institutions.

3.2.2.2 Processes for engaging with consumers and end-users about impacts(S4-2)

Wizink, in addition to providing its customers with mailboxes and customer service telephone numbers and monitoring social networks and media in general as a way of receiving and detecting impacts, conducts monthly surveys to collect the opinions of its customers in order to continuously identify areas for improvement, avoid incidents and solve problems that internal processes may be causing. In addition, once a year a brand study is carried out in other general aspects of competitiveness and perception in order to ensure good practices. The studies are carried out by third-party experts recognized in the market using the telephone channel and digital means to contact customers.

The analyses of these surveys are presented and shared with different areas of the bank in order to develop action plans. They are delivered to the Chief Business Officer of Spain, Country Manager of Portugal and Director of Compliance as well as the Marketing team.

In addition to this continuous listening to customers and consumers, when the bank identifies an issue that may be causing an impact through the different interactions of customers with the entity, specific and ad-hoc surveys are evaluated and implemented to investigate the cause and be able to remedy the situation, as well as continuous monitoring of the market and consumption habits to adapt to tendencies, customer expectations and take advantage of opportunities.

On the other hand, these interactions with the customer with departments that directly manage the relationship with the customer, such as calls from customer service and collection managers, among others, are monitored on a regular monthly basis to ensure proper treatment of the customer and due compliance with the associated processes. This monitoring is another tool to listen to the dissatisfactions and problems caused to customers and thus be able to act. The result of all this monitoring is observed and managed within the bank's governance model.

Beyond the management of the day-to-day relationship with our customers, in the launch of new products, Wizink carries out market research and collects information to ensure that products are designed and marketed with the best customer experience in mind, anticipating potential impacts.

This way of proceeding, aimed at good collaboration with customers and consumers, is measured by the NPS (Net Promoter Score) metric, and is so relevant within the company that it is part of the annual corporate objectives. In 2024, the results have reached all-time highs in both countries: +27 in Spain and +45 in Portugal.

3.2.2.3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

Wizink has a Complaints Department (hereinafter 'the SAC'), which is responsible for guaranteeing the protection of the interests and rights of customers by dealing with their dissatisfactions and complaints. This is a universal, free channel that provides personalised solutions to customers' needs.

This department is separate from the commercial and operational services, performing its function independently in making decisions relating to the field of its activity, preventing the commercial or operational units from interfering in the management and resolution of complaints, having the capacity to submit proposals to the Board of Directors and, in general, having fluid access to this body. The principles on which the activity of the SAC is based are as follows:

- The correct application of internal policies and procedures.
- Proper compliance with Wizink's contractual obligations with customers.
- Compliance with applicable regulations and good practices published by the Bank of Spain and the Bank of Portugal.

The channels available to submit complaints are:

- Spain: customers can submit their complaints to Wizink by e-mail (reclamaciones@Wizink.es) or by post to the address: Ulises 16-18, 28043, Madrid. They can also access the SAC area of Wizink's public website (<https://www.Wizink.es/public/informacion-legal/servicio-reclamaciones-y-atencion-cliente>) and complete the form indicated for this purpose or send a free text letter. Once the complaint has been made to Wizink, the legal period for resolution by the Complaints Department can be up to 60 days (depending on whether the complaint concerns payment services or another reason, and whether it is made by a customer or non-customer). Consumers can also go to the Municipal Consumer Information Offices (OMICs) where they can file a dissatisfaction or complaint if they wish. Customers who are not satisfied with the response or who have not received it can complain to the Bank of Spain's Department for the Conduct of Entities or to the Complaints Service of the Directorate General for Insurance and Pension Funds (DGS).

- Portugal: customers can submit complaints to Wizink indistinctly via e-mail (reclamacoes@Wizink.pt) and post and to Banco de Portugal or Autoridade de Supervisão de Seguros e Fundos de Pensões (ASF), i.e. there is no prerequisite of submission to the bank before complaining to the regulators.

In addition, if a customer has a problem or incident that requires more immediate attention, the Wizink Line and a mailbox (Wizink Online) are available in both countries, which can be accessed both from the Customer Area of the Wizink website and from the Wizink mobile app.

Wizink's Complaints Department has specialised teams that manage dissatisfactions and complaints through a systemised process of registering, analysing and controlling them, and classifying them according to the different types of complaints. All this makes it possible to identify the causes of customer dissatisfaction, the root causes of the problems and, as a result, the appropriate solutions for each case. This internal control for complaints is carried out on a daily basis and complies with the deadlines established by law. Wizink treats complaints confidentially and respects privacy and data protection rights (according to Wizink's Data Protection and Complaints Channel policies - see section 3.2.2.1 Policies related to consumers and end users (S4-1)).

At Wizink we use the information obtained through complaints and dissatisfactions to improve our products and services offered and as an early warning system to identify potential risks. In addition to its function of resolving complaints and dissatisfactions, the SAC also performs, in practice, a control function as a subject with knowledge of the sources of customer dissatisfaction. In the exercise of its functions, the SAC assesses the performance of the commercial and operational areas in their relations with customers when dissatisfaction or complaint is made. In addition, it continuously analyses data on complaints and dissatisfactions management to identify and address recurring or systemic incidents, and possible legal, operational and conduct risks, among others, reporting the results of this analysis to its management body, especially to the Board of Directors and the Risk Committee, to take corrective measures if necessary.

In addition, Wizink has a Customer Defence Regulation that aims to regulate the requirements, procedures and activity in general that the SAC must observe, to always guarantee adequate compliance with the regulations on transparency and customer service for financial institutions.

The breakdown of SAC activity in 2024 is shown in the following table:

Key data	Spain	Portugal	Total Wizink Bank S.A.U.
Complaints received in 2024	22.213	2.066	24.279
Complaints resolved in customer's favour	488	232	720
Complaints resolved in Wizink's favour	15.249	1.785	17.034
Complaints pending	1.040	27	1.067
Complaints not admitted for processing	6.245	70	6.315

In 2024, one of the main lines of work of the SAC, in direct collaboration with the Fraud team, has been the resolution of fraud cases related to online card transactions and the increasingly sophisticated techniques used to defraud. Wizink has carried out communication and education campaigns for customers on cyber fraud during 2024 with the aim of making our customers aware of the precautions to be taken to avoid falling victim to cyber criminals.

3.2.2.4 Taking action on material impacts on consumers and end-users, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions (S4-4)

Wizink's main activity is consumer finance, so the measures to manage materiality risks and take advantage of opportunities are focused on the use of credit cards as a means of payment and as a form of purchase financing. In 2024, measures have also been taken in the Savings business line to manage risks related to the customer experience in the contracting and service of these products.

The measures reported below are aimed at avoiding the potential negative impacts and risks identified in the section *Incidents, risks and opportunities of relative importance and their interaction with the strategy and business model (NEIS 2 SBM-3)* of this chapter, as well as enhancing the opportunities indicated.

In the financing angle, the measures are aimed at providing product information so that customers can make well-informed decisions and manage their finances correctly. The main measures are:

- Keep customers informed about their products, use and expenses on a day-to-day basis through clear and accessible contractual terms and conditions, always updated information on digital channels and sending customers a detailed monthly statement. The bank focuses on the use of simple and clear vocabulary that allows a good understanding of the product (both on cards and loans) and to this end it carries out continuous reviews of the brand guides.
- Design products so that they offer flexibility to customers, so they can choose and change their payment method, select their preferred service channels, be informed at all times of the costs associated with purchase financing. A good use of the revolving product has been key for the company that began its first actions in 2020 by promoting transparency regarding the available payment methods at the time of purchasing the product. Since then, Wizink has carried out a plan that has continued over the years to help customers avoiding the risk if they make excessive use of the revolving payment method. Examples of these actions are the continuous increase in the payment to be covered in the minimum due for existing and new clients (changes in 2023) and redesign of the collection of fees and insurance premiums so that they are part of the settlement independently of the revolving line (2022 and 2023). In the case of Portugal, the same type of actions have been followed, but started with a delay of approximately one year.
- Encourage customers to manage the repayment periods of their credit card debt more proactively to avoid over-indebtedness and a high cost of financing through the revolving modality of their card. In parallel with the product design changes listed above, an educational program ("Uncomplicated Finance") has been launched that has consisted on improving the content published on the website and blog on the use of the card (started in 2022), the publication of a simulator for calculating costs and repayment periods (2023) and a monthly communication plan aimed at customers with long repayments to alert them of the situation in which they find themselves, encouraging them to review and modify their payment method. These segmented communications began in 2023 through a multichannel strategy that relies on service channels and digital formats and will continue during 2025.
- Adherence to the ANSEF Transparency Protocol: <https://www.Wizink.es/public/blog/Wizinker/protocolo-asnef>.

In the aspect of payment methods, the measures have been focused on improving the level of customer knowledge about the product so that they use it properly.

- Evolve web content to ensure the proper use of credit cards by facilitating various mechanisms related to money management and online behavior and continue with the financial education program - 'Uncomplicated Finance', recognizing that customers have different information needs when it comes to understanding and managing their products and services. In 2024, Wizink has extended the measures taken in Spain during 2023 to Portugal, improving the information provided in the cards section and preparing a simulator that will be published at the beginning of next year. It has also made investments in educational content, specifically in social networks, distributed by third parties (branded content).
- Continue education on the phenomenon of Cybercrime that continues to be a market context for most service companies.
- Send alerts to customers thanks to the bank's robust fraud prevention system that detects unusual movements with Wizink credit cards to confirm these transactions and quickly block the card to avoid possible fraud. In addition, the cardholder will not be liable for the financial consequences resulting from the use of a lost, stolen or forged card, provided that there is no negligent behaviour, and that the customer has made the corresponding report of theft of their card.
- Strengthen security measures in online card payments thanks to the implementation of the Double Customer Authentication system, or SCA, which more robustly identifies the person who makes an online payment transaction and, therefore, reduces the chances of fraud. Wizink has had these controls in place since 2021.
- Enable mobile payment through the most used wallets on the market to improve the customer experience and ensure that Wizink is adapted to consumer habits. In Spain, Wizink already makes these media available to its customers and in Portugal, work has been done in 2024 so that they can be launched on the market at the beginning of next year.
- Maintain free insurance just for being holders of a Wizink card that covers them for accidents, travel assistance and purchase protection for free in Spain and Portugal. Furthermore, in Portugal where we have stands in shopping centres, we guarantee customer protection in the event of an accident with civil liability insurance. The summary and coverage of the free insurance for Wizink cards can be consulted on Wizink's public websites at: www.Wizink.es/segurostarjetas and www.Wizink.pt/public/vantagens-Wizink/seguros.

In saving products, actions taken in 2024 have been focused on redesigning operations and improving the level of information that customers receive during the acquisition of a product. These actions had been identified in the previous year due to material impacts in the distribution of deposits.

- Automation and digitalization of middle and back-office processes in order to shorten and speed up the acquisition period and improve the customer experience.

- Redefinition and automation of the communications that the customer receives during the acquisition of a product to facilitate the process.

In general, the actions taken for all products are:

- Facilitate management with human and face-to-face support in case the customer has any special needs, and offer a special service to vulnerable groups that allows direct access to agents without going through the automated menus (IVR) <https://www.Wizink.es/public/servicios-a-mayores-de-65-o-con-discapacidad>
- Rely on a risk control environment, which guarantees documentation of procedures and tests new processes or modification of operations, in order to proactively identify potential incidents and correct them, before they become impacts for our customers.
- Adherence to Portal de la Queixa, as a source of information on complaints or dissatisfaction by customers and consumers in Portugal
- Submit products to product and industry awards to identify insights and insights into how the market values Wizink products when compared to competing solutions.

Finally, it should be noted that, as reported in the section Incidents, risks and opportunities of relative importance and their interaction with the strategy and business model (NEIS 2 SBM-3) within this chapter of Consumers and End Users, no real incidents of material importance have been identified. However, the Entity monitors the actions and initiatives previously reported through the management of queries and complaints to the Customer Service, the management of operational incidents and the evolution of the main indicators of the Voice of the Customer Program such as NPS, satisfaction or intention to continue.

3.2.3 METRICS AND TARGETS

3.2.3.1 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

The entity has not established specific time-bound goals for the identified IROs. However, the actions reported in the previous section are part of the actions the company undertakes to promote positive incidents and manage opportunities.

4 GOVERNANCE INFORMATION

4.1 BUSINESS CONDUCT (NEIS G1)

4.1.1. GOVERNANCE

4.1.1.1. The role of the administrative, management and supervisory bodies (NEIS 2 gov-1)

In line with what is indicated above in section 1.2 'Governance', the Regulations of the Board of Directors establish the principles of action, the rules of operational development and the internal regulations of the Board of Directors, in accordance with the regulations applicable to it and the Articles of Association of Wizink Bank, as well as regulating the rules of conduct of its members and the supervision and control system, with the aim of ensuring that the bank is managed in the best possible way.

These Regulations set out the responsibilities of the Board, which include approving the Bank's general policies and strategies, and overseeing their implementation, including, by way of illustration only: the Risk Management and Control Policy, including tax risks, the Corporate Governance and Internal Governance Policy of the Bank and its Group, the Regulatory Compliance Policy, including the approval of codes of conduct, as well as the adoption and implementation of organisational and management models that include appropriate supervisory and control measures to prevent crimes or to significantly reduce the risk of their occurrence (crime risk prevention model).

In addition, the Risk Committee is entrusted with the following functions, among others: supervising compliance with applicable national and international regulations for matters relating to money laundering, conduct in the securities markets, data protection and the scope of the bank's activities, and supervising compliance with the bank's internal codes of conduct and manuals and procedures.

Finally, and as already mentioned in section 1.2.1. the role of the administrative, management and supervisory bodies (GOV-1), the members of these bodies have strategic vision (in accordance with their responsibilities) and relevant experience in senior management positions, rigorous knowledge of the sector, as well as planning and management skills. In addition, the Chief Executive Officer receives training during the year on business conduct issues as part of the entity's training programme.

4.1.2. IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

4.1.2.1. Description of the process to identify and assess material impacts, risks and opportunities (NEIS 2 iro-1)

The process for identifying material impacts, risks, and opportunities related to business conduct issues is described in section 1.4.1. Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) of this document.

4.1.2.2. Business conduct policies and corporate culture (G1-1)

The objective of Wizink is to promote ethics, honesty, and professionalism within the company and among its employees, as well as to develop and maintain an acceptable standard of conduct for the company, its third parties, clients, and employees.

The **Code of Conduct** defines, among others:

- Specific rules to prevent corruption, both among officials and private citizens, which prohibit all deliveries, promises, or offers of any payment, commission, gift, or remuneration, always with due diligence.
- Guidelines to be followed regarding environmental protection; all employees, within the scope of their competencies, are always required to comply with all legal requirements and internal procedures established by Wizink, in order to reduce or avoid, as much as possible, any impact on the environment caused by their activities.

It also includes a mention of the correct conduct of the company and its employees regarding:

- Relationships with Suppliers: the procurement of supplies and external services will be performed in accordance with the internal purchasing and payment procedures established for this purpose by Wizink.

Collaborators who perform functions or have powers in the Company for the acquisition of goods, contracting of services, and negotiation with suppliers, must act in accordance with these internal purchasing and payment procedures. Collaborators, especially those involved in decisions regarding the procurement of supplies or services, should avoid any interference that may affect their impartiality or objectivity, always acting in the best interest of Wizink.

Whenever possible, they will avoid exclusive relationships with a supplier. Any queries will be resolved by the Procurement Department and/or the Financial Control Department.

- Competition Protection: Wizink and its Collaborators must comply with the principles and rules of fair competition and not violate competition protection legislation.

Due to the complexity of competition protection legislation, all agreements with competitors or third parties that may have a negative effect on competition must be verified by the legal department.

All agreements between competitors with the aim of coordinating their actions in the market are prohibited. This includes the following agreements:

- Price fixing.
- Sales that limit the types of products that can be offered or that tie the purchase of products to other purchases.
- Division of territory, customer types, or production quotas.
- Engaging in boycott actions.

The abuse of a dominant position in the market for a specific product is illegal. 'Abuse' refers to situations where dominant market power is exercised to the detriment of suppliers or customers. Competition protection legislation prohibits acquisitions that lead to a dominant market position and that may negatively affect competition.

On the other hand, the Code of Conduct establishes certain general guidelines regarding internal relationships:

- **Principle of equality and non-discrimination:** One of Wizink's basic principles is to ensure a working environment that guarantees personal dignity and where behaviors contrary to the fundamental human rights protected by the **Spanish** Constitution and law, as well as by the applicable regulations in any country where Wizink operates, are avoided.
- **Respect for people** in all professional relationships at Wizink: The bank promotes relationships among employees based on mutual respect and collaboration. Wizink is committed to ensuring a workplace free from violence and any type of harassment; abusive behavior, intimidation, disrespect, or physical or verbal violence within the company's professional relationships are not tolerated. Wizink has an action protocol that includes any possible harassment at work, with the aim of establishing an alternative action framework within the bank, in addition to the Whistleblower Channel ('Ethical Mailbox'), available to all workers who detect or are affected by any type of harassment, as well as for other individuals who have or have had a relationship with Wizink.

- **Work-life balance:** Wizink encourages its employees to maintain a balance between their professional activities and their personal and family needs. This is achieved through measures that facilitate, among other things, flexible working hours.
- **Collective rights:** One of Wizink's principles is to promote social well-being and job stability through an open communication flow with all labor unions and the promotion of dialogue, communication, and transparency.
- **Workplace safety and health risk prevention:** Wizink seeks to ensure that its employees understand and follow preventive measures related to workplace safety and health. The bank also aims to ensure that all employees receive adequate training on occupational risk prevention and that they perform their activities in a safe environment.

The Code of Conduct is approved by the Board of Directors, and its management falls under the Compliance Department.

There are also standards in support of this Code of Conduct:

- The Company has a **Conflict of Interest standard**, which aims to identify, evaluate, manage, and mitigate or prevent real or potential conflicts of interest that may arise in the performance of Wizink's activities.
- Additionally, there is a **Gifts and Invitations standard**. Although the exchange of gifts and invitations is part of business both nationally and internationally, where Wizink operates, inappropriate or excessive gifts and invitations are sometimes given with the intent to exert undue influence or give the impression of corruption, bribery, or **kickbacks**. To minimize any related risks, the standard specifies that collaborators are prohibited from accepting any type of income or commissions for operations conducted by Wizink and that it is not permitted to take advantage of their position for personal benefit.

Both standards are approved by the ERM and managed by the Compliance Department.

At Wizink, we have mechanisms to detect, report, and investigate issues related to illicit behaviours or behaviours contrary to our Code of Conduct. The **Ethical Mailbox or Whistleblowing Channel**, covered under the **Whistleblowing Policy** approved by the Audit Committee, allows for the reporting or communication of information related to violations of the Code of Conduct, irregularities detected in the prevention of money laundering and terrorist financing, any violation of the law or Wizink's internal rules, as well as any discriminatory or threatening action, with the possibility of making anonymous reports. This policy, subject to Law 2/2023 (SP) of February 20, regulating the protection of persons who report regulatory infringements and anti-corruption efforts, and Law 93/2021 on the general protection regime for whistleblowers (PT), which transposes EU Directive 2019/1937 on the protection of persons who report violations of Union law, establishes protection for whistleblowers, preventing the whistleblower from suffering any harm or unfavourable treatment as a result of making reports in good faith. Unfavourable treatment includes dismissals, disciplinary actions, threats, and other unfavourable treatments related to the filing of the report.

The Whistleblowing Channel facilitates the detection of criminal conduct, aiming to identify suspicious behaviour as early as possible with the maximum guarantee of impartiality and confidentiality. It is clearly visible both on Wizink's intranet and on its public website and is managed by a third party, ensuring the confidentiality of complaints, as Wizink does not have access to the identity of the whistleblower. This provider monitors the operation of the Whistleblowing Channel and issues biannual reports on the number of reports filed, managed, and ongoing. The Compliance Function evaluates the Whistleblowing Channel at least annually and issues a report.

In some cases, the Whistleblowing Channel works as an additional or alternative channel to other existing tools, such as direct communication with the Human Resources Department, unions, or the Health and Safety Committee, to initiate a prevention protocol in case of harassment, etc.

Every year, a report is prepared that includes the cases reported by Wizink employees and other whistleblowers (including board members and senior management) through the Whistleblowing Channel. This report is shared with the Audit Committee. Additionally, Compliance will inform the Board of Directors about the handling of reports received through the Whistleblowing Channel when they occur and are serious enough to justify the intervention of this body.

In the year 2024, a single report was received through the Whistleblowing Channel, which was unrelated to this area. After evaluation, it was closed with no risk or necessary actions.

Regarding the fight against corruption and bribery, Wizink continuously works to maintain a strong compliance culture through the promotion of responsible financial principles. The company has various tools and policies in place to ensure the fight against corruption, bribery, and money laundering. These policies and tools, including training through an annual online course, apply to all employees, regardless of their positions, as there are no particularly susceptible or exposed roles to these risks.

Wizink has a **Policy for the Prevention and Detection of Criminal Risk**, approved by the Board of Directors and managed by the Compliance Director. This policy is communicated to all Wizink executives and employees, demonstrating a commitment to the ongoing supervision and sanctioning of all fraudulent acts and behaviours. At the same time, it serves as an effective communication and awareness tool among all stakeholders by promoting an ethical and honest business policy.

Additionally, there is a **Delegations Manual**, also approved by the Board of Directors, which defines a decision-making process and assigns the corresponding level of responsibility for each decision-making body and executives within the Group.

Wizink develops training practices regarding these policies. From the beginning of their employment, all employees must complete mandatory training during the onboarding process that covers essential aspects of business conduct. Additionally, the entity holds annual mandatory refresher sessions for all staff (biannual in the case of the Delegations Manual and the Policy for the Prevention and Detection of Criminal Risk) to ensure that employees are aware of best practices and current regulations. The depth of coverage in these trainings includes explanatory sections, regulatory references, and some examples and questionnaires, allowing employees to properly understand and apply the principles of business conduct in their daily work.

The **Compliance Function** acts as a second line of defence in relation to non-financial risks, specifically the prevention of money laundering and terrorist financing (managed through the **Policy for the Prevention of Money Laundering and Terrorist Financing**), data protection, conduct, reputational, and regulatory risks.

The main tasks of the Compliance Function include ensuring that all customers are treated fairly, as well as identifying, evaluating, communicating, and managing compliance and reputational risks that affect all business lines, employees, products, and legal entities. In addition to other control areas and functions, the Compliance Function establishes compliance standards and applies a global risk-based approach. It is also responsible for the effective monitoring and oversight of the regulatory environment affecting Wizink's activities; supervising and monitoring the adherence to the Code of Conduct, and promoting a culture of regulatory compliance, particularly in areas such as sanctions and terrorist financing regulations, money laundering, corruption and bribery, potential conflicts of interest, and, in general, any criminal activity that may occur within Wizink.

4.1.2.3. Management of relationships with suppliers (G1-2)

Wizink has a purchasing and supplier management policy in place called Supplier Selection and Management Policy, updated in December 2024. It establishes the guidelines for selecting and managing external suppliers, in order to guarantee that there are adequate controls for protect the assets, reputation and interests of Wizink and its customers.

- For Wizink, the management of suppliers is especially important when any of its functions are outsourced, especially the company's critical functions, so the policy has been developed in line with DORA Regulation, the EBA Guidelines and Rule 43 of Circular 3/2022 of the Bank of Spain, with the following objectives:
- Optimisation of suppliers to maximise economic leverage and risk supervision capacity.
- Standardise supplier selection and management criteria.
- Document the requirements for the selection and management of suppliers.
- Have a standard and consistent contract that meets the applicable legal and regulatory requirements.
- Gather accurate and relevant supplier information that can be shared across the Group.
- Comply with the Wizink's Code of Conduct and applicable policies, as well as the legal and regulatory requirements applicable in all jurisdictions.
- Act in accordance with the socially responsible practices of the sector.

Effective supplier selection strategies and management of supplier-related risks are critical for Wizink to meet its operational objectives and mitigate key risks, including legal and compliance risk, operational risk, financial risk, strategic risk, technological risk and reputational risk. For this reason, in all cases a due diligence is carried out prior to hiring, and an annual review of critical suppliers is carried out. Additionally, the Bank has successfully passed the Internal Audit Review on outsourcing essential business functions or services to external providers within the period 2023, which applies to 11 suppliers classified as critical, in accordance with Royal Decree 84/2015 and rule 43 of Circular 2/2016, amended by Circular 3/2022, of the Bank of Spain. The result of the audit has been notified to the Board of Directors in December 2024.

Suppliers are divided into four categories according to the Company's risk exposure. Due diligence and supplier auditing processes are subject to their segmentation, so that the more critical the supplier, the more robust the control applied to it. The most critical suppliers are monitored to identify possible incidents, despite the fact that there are no suppliers with relevant risks related to the environment, society, or equality.

Each supplier has an assigned service owner who, as established by the policy, carries out the relationship with suppliers, including performance management and an annual risk assessment and review. These activities include

daily dealings with vendors regarding support and service delivery. In 2024, 494 evaluations were carried out on suppliers, all of them approved.

Due to the activity of the company, its suppliers provide mainly auxiliary services for the development of financial activity such as advice or technological services. However, the standard framework contract model has a clause which includes social and environmental criteria for general management of suppliers. Likewise, at the end of 2023, ESG criteria have been incorporated for future supplier selection processes, including a specific questionnaire in the RFP (Request for Proposal) process.

In relation to the payment of suppliers, Wizink has an accounts payable policy with the purpose of ensuring effective management of invoices payable, from receipt to payment, without any distinction based on type or size of company. The aforementioned policy covers a series of objectives and establishes the assurance of a series of controls, among which the following stand out:

Objectives:

- Ensure that invoices are processed, approved and paid within the established deadlines.
- Ensure that the approval levels and limits are in accordance with the delegation policy.

Controls:

- Validate the existence of a prior contracting order linked to each invoice (e.g.: contract, purchase order, etc.).
- Validate that the goods, services, amounts and other attributes provided and invoiced by the supplier comply with the agreed terms, before initiating any payment request.
- Validate that invoices are paid within the established deadlines, prior to compliance with the associated approvals, in the payment tool.

4.1.2.4. Prevention and detection of corruption and bribery (G1-3)

In addition to what is described in section 4.1.2.2, and regarding the procedure for addressing investigations into corruption and bribery, investigations of alleged cases received through the whistleblower channel are conducted, after prior evaluation by an independent third party (Baker McKenzie), by the Compliance area, which is not related to the management chain involved in the matter. On the rare occasions when the reported conduct involves the Compliance area, the investigation is managed by the Director of Internal Audit.

If necessary, the Compliance Director may appoint an independent investigator to perform a specific investigation. In any case, Wizink ensures that only those individuals whose participation is crucial to the investigation have access to the data and information about the reported complaint.

Based on the data collected in the annual report on the whistleblower channel sent by Baker McKenzie, as well as any additional internal information that may be relevant for these purposes, Compliance evaluates at least annually the functioning of the Whistleblower Channel and, if deemed necessary, the Anti-Money Laundering and Counter-Terrorism Financing Department participates in this annual evaluation. The evaluation is duly documented through a report on the functioning of the Whistleblower Channel included in the Annual Compliance Report submitted to the bank's Risk Committee. In the area of criminal risk prevention, the internal control body (OCI) is aware of the detected cases, as well as the status and results of the investigations performed, keeping the Enterprise Risk Management Committee (ERMC) informed of the control and evolution of the criminal risk prevention model. The ERMC, if necessary, assists the OCI in resolving any issues that may arise related to the potential commission of crimes, including those related to corruption and bribery. Additionally, the OCI would notify the entity's Risk Committee of any possible criminal activity that may be detected, as well as the measures taken for subsequent reporting to the Board.

During the year 2024, and in the fight against corruption and bribery, Wizink provided training to all its employees. This training was directed to all employees, without distinction of positions, as there are no particularly susceptible or exposed positions to these risks.

4.1.3 METRICS AND TARGETS

4.1.3.1 Confirmed incidents of corruption or bribery (G1-4)

During the year 2024, no incidents of discrimination, harassment, human rights violations, or corruption were reported. A single complaint was received through the Whistleblower Channel, unrelated to those topics, and after being evaluated and investigated, it was closed without risk or necessary actions. Zero fines and zero convictions for violations of anti-corruption and anti-bribery laws were recorded for any actor in the value chain.

4.1.3.2 Payment practices (G1-6)

Wizink has an accounts payable policy in place in order to ensure effective management of invoices, from receipt to payment, with no distinction by type or size of the supplier. More information on payment to suppliers can be found in section 4.1.3.3. Management of relationships with suppliers (G1-2).

Payments in Wizink are made in accordance with the provisions of Law 3/2004, which can be extended in certain cases to 60 days by agreement between the parties.

In 2024, the average time it took Wizink to pay an invoice was 50 days in Spain and 33 days in Portugal. The percentage of payments made in a period of less than 60 days over the total number of payments made has been 64.96% in Spain and 86.53% in Portugal.

There are no legal proceedings against Wizink for delay in payments to suppliers.

5 ANNEX I

In accordance with the second transitional provision: Continuity in the obligation to prepare and verify the non-financial information statement, of the Business Sustainability Information Bill approved on November 15, 2024, we include in this annex the following information required under Law 11/2018 on non-financial information and diversity and not covered by the information included in the previous sections:

- Own workforce:
 - o Employment
 - o Work organization
 - o Health and safety
 - o Social relations
 - o Training
- Corruption and bribery: Contributions to foundations and non-profit entities.
- Subcontracting and suppliers: Supervision and audit systems and their results.
- Tax information:
 - o Taxes on profits paid
 - o Public subsidies received

5.1. Own Workforce

5.1.2. Employment

5.1.2.1. Employee distribution

Total number and distribution of employees by gender, age, country and level:

Country	Employees 2023	Employees 2024
Spain	968	772
Portugal	95	90
Total employees	1.063	862

2023

Country	Employees	Group of Age			Professional Category					
		<30	30-50	>50	Directors & Senior Management		Professional: other categories		Administrative Staff	
					W	M	W	M	W	M
Spain	968	51	732	185	55	54	209	197	324	129
Portugal	95	1	85	9	12	11	46	26	-	-
Total	1063	52	817	194	67	65	255	223	324	129

2024

Country	Employees	Group of Age			Professional Category					
		<30	30-50	>50	Directors & Senior Management		Professional: other categories		Administrative Staff	
					W	M	W	M	W	M
Spain	772	30	566	176	58	49	196	188	189	92
Portugal	90	1	78	11	10	11	44	25	-	-
Total	862	31	644	187	68	60	240	213	189	92

Total number and distribution of employment contract types by gender, age and professional category (31/12):

Due to the stability of Wizink Bank's workforce during 2024, information regarding the average number of employees by different breakdowns is not reported because it presents no significant difference compared to the end-of-year breakdown information.

2023

Gender	Permanent Contract		Fixed-term Contract		Total contracts	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Women	469	173	1	3	470	176
Men	381	33	1	2	382	35
TOTAL	850	206	2	5	852	211

Group of Age	Permanent Contract		Fixed-term Contract		Total contracts	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Less than 30	44	7	1	0	45	7
Btw. 30 & 50	649	165	0	3	649	168
More than 50	157	34	1	2	158	36
TOTAL	850	206	2	5	852	211

Professional Category	Contratos indefinidos		Contratos temporales		Contratos totales	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Directors & Senior Management	132	0	0	0	132	0
Professional: other categories	473	5	0	0	473	5
Administrative staff	245	201	2	5	247	206
TOTAL	850	206	2	5	852	211

2024

Gender	Permanent Contract		Fixed-term Contract		Total contracts	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Women	408	87	2	-	410	87
Men	342	22	1	-	343	22
TOTAL	750	109	3	-	753	109

Group of Age	Permanent Contract		Fixed-term Contract		Total contracts	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Less than 30	29	2	-	-	29	2
Btw. 30 & 50	557	85	2	-	559	85
More than 50	164	22	1	-	165	22
TOTAL	750	109	3	-	753	109

Professional category	Permanent Contract		Fixed-term Contract		Total contracts	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Directors & Senior Management	127	1	-	-	127	1
Professional: other categories	448	5	-	-	448	5
Administrative staff	175	103	3	-	178	103
TOTAL	750	109	3	-	753	109

5.1.2.2. Number of dismissals

Throughout 2024, there have been 64 dismissals across all legal entities of Wizink. Below we break down the terminations by gender, age, and professional category:

2023

Gender	Group of Age	Professional category			
		Directors & Senior Management	Professionals: Other Categories	Administrative staff	Total dismissals
Women	Less than 30	-	1	3	4
	Btw. 30 & 50	-	-	31	31
	More than 50	-	-	6	6
Men	Less than 30	-	-	-	0
	Btw. 30 & 50	1	4	11	16
	More than 50	-	2	2	4
Total dismissals		1	7	53	61

2024

Gender	Group of Age	Professional category			
		Directors & Senior Management	Professionals: Other Categories	Administrative staff	Total dismissals
Women	Less than 30	-	-	-	0
	Btw. 30 & 50	-	8	24	32
	More than 50	2	4	6	12
Men	Less than 30	-	1	1	2
	Btw. 30 & 50	-	6	7	13
	More than 50	2	3	-	5
Total dismissals		4	22	38	64

5.1.2.3. Remuneration

Below, we present average remunerations by gender, age, and professional category:

		2023		2024	
Professional category	Group of Age	Women	Men	Women	Men
Directors & Senior Management	Less than 30			72.500 €	
	Btw. 30 & 50	94.851 €	100.049 €	115.355 €	120.555 €
	More than 50	109.351 €	161.166 €	137.311 €	105.913 €
Professionals: Other Categories	Less than 30	35.581 €	40.951 €	37.703 €	47.994 €
	Btw. 30 & 50	39.791 €	47.217 €	44.591 €	53.424 €
	More than 50	44.790 €	51.279 €	49.569 €	49.810 €
Administrative staff	Less than 30	21.310 €	21.087 €	26.659 €	22.408 €
	Btw. 30 & 50	22.510 €	23.709 €	21.449 €	22.763 €
	More than 50	22.579 €	27.210 €	22.723 €	26.914 €

Includes annual base salary and variable compensation (annual bonus and incentives) actually paid in 2023 and 2024.

2024

The calculations in the table have been made following the same methodology applied in 2024. This methodology is different from the one used for calculating the indicators in section S1-16 of the report, which follow the methodology dictated by the European Sustainability Reporting Standards.

Directors classified as independent and other external directors are entitled to a fixed remuneration as well as reimbursement of expenses incurred during the performance of their duties. This remuneration is paid in twelve monthly installments and is prorated if their tenure is less than twelve months in the fiscal year.

Below, I present the average remuneration for directors and executives, broken down by gender:

2024		
	Members	Remuneration*
Men	2	217.564,99 €
Women	1	217.166,68 €
Total	3	434.731,67€

* For the calculation of average remuneration, the remuneration received during the year by independent and non-executive directors for their non-executive functions is considered, according to the composition of the Board of Directors as of December 31, 2024.

5.1.3. Organization of work

Below are the absenteeism rates for 2023 and 2024:

ABSENTEEISM 2023	WZ BANK	WZ GESTION	WZ BANK PORTUGAL	IBERALBION	TOTAL
TOTAL ABSENTEEISM RATE	4,4	27,7	0,8	7,8	6,97
MEN'S ABSENTEEISM RATE	2,8	35,5	0,0	6,4	4,79
WOMEN'S ABSENTEEISM RATE	6,0	25,7	1,4	8,3	8,27

ABSENTEEISM 2024	WZ BANK	WZ GESTION	WZ BANK PORTUGAL	IBERALBION	TOTAL
TOTAL ABSENTEEISM RATE	2,7	18,5	1,2	6,6	4,97
MEN'S ABSENTEEISM RATE	3,3	16,9	2,0	6,2	5,57
WOMEN'S ABSENTEEISM RATE	2,1	24,0	0,0	7,3	4,12

(*) For the calculation of the absenteeism rate, the hours not worked due to illness (IT) and accidents at work (AT) are taken into account.

In 2024, there were 72,420 hours not worked (equivalent to 10,342 days not worked), which represents 4.97% of the total hours worked. In 2023, there were 131,295 hours not worked (equivalent to 18,756 days not worked), which represents 6.97% of the total hours worked. A decrease in absenteeism was observed during 2024.

A decrease in absenteeism is observed during 2024

5.1.4. Health and safety

Below is a breakdown of workplace accidents and their rates by gender ¹:

¹ Data provided by Mutua for all legal entities

2024	WIZINK BANK, S.A.U.	WIZINK GESTION, S.L.	WIZINK BANK suc PORTUGAL	IBERALBION, S.L.
Frequency Rate (*)	0	0	0	0
Incidence Rate (*)	0	0	0	0
Severity index (**)	0	0	0	0

2024	WIZINK BANK, S.A.U.	WIZINK GESTION, S.L.	WIZINK BANK suc PORTUGAL	IBERALBION, S.L.
Men's Frequency Rate (*)	0	0	0	0
Men's Incidence Rate (*)	0	0	0	0
Men's Severity index (**)	0	0	0	0

2024	WIZINK BANK, S.A.U.	WIZINK GESTION, S.L.	WIZINK BANK suc PORTUGAL	IBERALBION, S.L.
Women's Frequency Rate (*)	0	0	0	0
Women's Incidence Rate (*)	0	0	0	0
Women's Severity index (**)	0	0	0	0

(*) To calculate the Frequency and Incidence Rates, accidents with sick leave are considered, excluding in-itine accidents.

(**) To calculate the Severity Index, the days lost due to accidents are related (excluding in-itinere).

In 2024 there have been 5 accidents (including in-itinere accidents), one of them in the workplace and other at the employee's home, while they were teleworking.

No occupational diseases or work-related health problems have occurred during this period.

A continuación, se desglosan los accidentes por vehículo legal y género de los accidentados:

2024

	WIZINK BANK, España		WIZINK GESTION, S.L.		WIZINK BANK suc PORTUGAL		IBERALBION, S.L.		Total	
	M	W	M	W	M	W	M	W	M	W
No. Accidents in itinere	0	0	0	3	0	0	0	0	0	3
No. Accidents not in itinere with sick leave	0	0	0	0	0	0	0	0	0	0
No. Accidents not in itinere without sick leave	0	0	0	0	0	0	0	2	0	2
No. Accidents	0	0	0	3	0	0	0	2	0	5

2023

	WIZINK BANK, España		WIZINK GESTION, S.L.		WIZINK BANK suc PORTUGAL		IBERALBION, S.L.		Total	
	M	W	M	W	M	W	M	W	M	W
No. Accidents in itinere	3	1	0	1	0	0	1	2	4	4
No. Accidents not in itinere with sick leave	0	0	0	0	0	0	0	0	0	0
No. Accidents not in itinere without sick leave	0	0	0	0	0	0	0	3	0	3
No. Accidents	3	1	0	1	0	0	1	5	4	7

5.1.5. Social dialogue

In Spain, different agreements apply to all employees depending on the activity carried out by each subsidiary. Thus, the Collective Agreement for Banking, the Collective Agreement for Offices and Offices of the Community of Madrid, the Collective Agreement for Financial Credit Establishments and the State Collective Agreement for Contact Center. In Portugal, all employees are covered by the Banking Agreement.

Specific measures regarding health and safety at work are included in the various collective agreements applicable at Wizink. In this regard, the Occupational Risk Prevention Department ensures compliance with the various provisions in this area. Additionally, this department actively works to promote numerous health promotion actions (see section 3.1.3.8. Health and Safety Parameters). In Spain, there is worker representation on health and safety committees.

5.1.6. Training

During the year 2024, the following hours of training have been provided by professional category. The total number of hours includes the legal vehicles Wizink Bank, Wizink Gestion, Portugal Wizink Office and Iberalbion.

Professional Categories	Total Hours
Directors & Senior Management	1.654
Administrative Staff	2.124
Professionals: other categories	6.436
Total	10.214

5.2. Corruption and bribery - contributions to foundations and non-profit entities

During 2024 Wizink has made contributions to foundations and nonprofit entities amounting to 373.313,91€.

5.3. Subcontractors and suppliers – Supervision and Audit systems and their results

An annual audit is required for suppliers providing services considered critical to the bank, in order to manage risk and assess their internal controls and operational capabilities. The type of audit conducted for critical suppliers in 2024 was ISAE 3402 SOC1 Type II. A total of 11 audits were conducted, all of which were closed without exceptions.

5.4. Tax information

Consolidated Group information:

Profit before tax (thousands of euros)	Spain	Portugal	Total
WIZINK GROUP	(54.192)	12.524	(41.668)
TOTAL	(54.192)	12.524	(41.668)

Tax (expense)/income (thousands of euros)	Spain	Portugal	Total
WIZINK GROUP	24.427	(8.312)	16.115
TOTAL	24.427	(8.312)	16.115

In 2024 Wizink has not received any Government grant.

6 ANNEX II

Table linking the requirements of Law 11/2018, GRI and ESRS indicators

Content of Law 11/2018 on non-financial information			
Information required by Law 11/2018 on non-financial information	Information required by Law 11/2018 on non-financial information	Information required by Law 11/2018 on non-financial information	Criterio de reporting: GRI y ESRS seleccionados
GENERAL INFORMATION			
A brief description of the business model including its business environment, organization and structure	Material	14-17 6-11 11-12	ESRS2 GOV-1 ESRS2 GOV-2 ESRS2 SBM-1 ESRS2 SBM-2 ESRS2 SBM-3 ESRS2 MDR-P G1-1
Markets in which it operates	Material	14	
Objectives and strategies of the organization	Material	14-17	
Main factors and trends that may affect its future evolution	Material	14-20	
Materiality principle	Material	20-22	ESRS2 IRO-1 ESRS2 IRO-2 ESRS2 SBM-3
ENVIRONMENTAL MATTERS			
Management approach: description and results of the policies related to these issues as well as the main risks related to them linked to the group's activities	Non material	N/A	N/A
Detailed general information			
Detailed information on the current and foreseeable effects of the company's activities on the environment and, where appropriate, on health and safety	Non material	N/A	N/A
Environmental assessment or certification procedures	Non material	N/A	N/A
Resources dedicated to the prevention of environmental risks	Non material	N/A	N/A
Application of the precautionary principle	Non material	N/A	N/A
Amount of provisions and guarantees for environmental risks	Non material	N/A	N/A
Pollution			
Measures to prevent, reduce or repair emissions that impact the environment severely, taking into account any form of activity-specific air pollution, including noise and light pollution	Non material	N/A	N/A
Circular economy and waste prevention and management			
Prevention measures, recycling, reuse, other forms of recovery and disposal of waste	Non material	N/A	N/A
Actions to combat food waste	Non material	N/A	N/A

Sustainable use of resources			
Water consumption and water supply according to local limitations	Non material	N/A	N/A
Consumption of raw materials and measures adopted to improve the efficiency of their use	Non material	N/A	N/A
Energy consumption, direct and indirect	Non material	N/A	N/A
Measures taken to improve energy efficiency	Non material	N/A	N/A
Use of renewable energy	Non material	N/A	N/A
Climate change			
Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	Non material	N/A	N/A
Measures taken to adapt to the consequences of climate change	Non material	N/A	N/A
Reduction goals established voluntarily in the medium and long term to reduce greenhouse gas emissions and the means implemented for this purpose	Non material	N/A	N/A
Protection of biodiversity			
Measures taken to preserve or restore biodiversity	Non material	N/A	N/A
Impacts caused by activities or operations in protected areas	Non material	N/A	N/A
EU Taxonomy			
European taxonomy indicators regarding eligibility	Material	23-43	N/A
INFORMATION ON SOCIAL AND PERSONNEL-RELATED MATTERS			
Management approach: description and results of the policies related to these issues as well as the main risks related to them linked to the group's activities	Material	44-59	ESRS2 MDR-P S1-1
Employment			
Total number and distribution of employees by gender, age, country and professional category.	Material	54 55 74	S1-6 S1-9 GRI 405-1 regarding employees by category, gender and age
Total number and distribution of employment contract types and annual average of permanent contracts, temporary contracts and part-time contracts by sex, age and professional classification	Material	54 74	GRI 2-7 (2021) regarding employees by labor contract and type, by gender S1-6
Number of terminations by gender, age and professional category.	Material	76	GRI 3-3 (2021) S1-16
Average remuneration and its evolution broken down by sex, age and professional classification or equal value	Material	58 77	GRI 3-3 (2021) S1-16
Salary gap, the remuneration of equal or average jobs in the company	Material	58 77	GRI 3-3 (2021) S1-16
Average remuneration of directors and managers, including variable remuneration, expenses, indemnities, payment to long-term savings pension systems and any other perception disaggregated by gender	Material	77	GRI 3-3 (2021) S1-16
Implementation of labour disconnection policies	Material	44	ESRS2 MDR-P S1-1

Number of employees with disabilities	Material	56	S1-12
Work organization			
Organization of working time	Material	44	ESRS2 MDR-P S1-1
Mechanisms and procedures that the company has to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	Material	49	S1-3
Number of hours of absenteeism	Material	57 78	GRI 3-3 (2021) S1-14
Measures aimed at facilitating work/life balance and promoting the jointly responsibility by both parents	Material	49 54 58	ESRS2 MDR-T ESRS2 MDR-A S1-4 Actions S1-5 Targets S1-15
Health and safety			
Health and safety conditions at work	Material	56 57	S1-11 S1-14
Work accidents, in particular their frequency and severity, as well as occupational diseases; disaggregated by sex	Material	57 78	GRI 403-9 regarding number and rate of accidents GRI 403-10 regarding cases of occupational ailments and diseases S1-14
Social relationships			
Organization of social dialogue including procedures for informing, consulting and negotiating with staff	Material	48	S1-2
Mechanisms and procedures that the company has to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	Material	49	S1-3
Percentage of employees covered by collective agreement by country	Non material	N/A	N/A
Balance of collective agreements, particularly in the field of health and safety at work	Non material	N/A	N/A
Training			
Training policies	Material	44	ESRS2 MDR-P S1-1
Total number of training hours by professional category	Material	56 80	S1-13
Universal accessibility			
Universal accessibility for people with disabilities.	Material	49 56	ESRS2 MDR-A S1-4 S1-12
Equality			
Measures adopted to promote equal treatment and opportunities between women and men	Material	49 54	ESRS2 MDR-T ESRS2 MDR-A S1-4 S1-5
Equality plans, measures adopted to promote employment, protocols against sexual and gender-based harassment	Material	44 49	ESRS2 MDR-P ESRS2 MDR-A S1-1 S1-4 GRI 3-3

Policy against all types of discrimination and, where appropriate, diversity management	Material	44	ESRS2 MDR-P S1-1
RESPECT FOR HUMAN RIGHTS			
Management approach: description and results of the policies related to these issues as well as the main risks related to them linked to the group's activities	Material	44 61	ESRS2 MDR-P S1-1 S4-1
Application of due diligence procedures			
Application of due diligence procedures in the field of human rights and prevention of risks of violation of human rights and, where appropriate, measures to mitigate, manage and repair possible abuses committed	Material	49 67	ESRS GOV 4 S1-3 S4-4
Complaints for cases of violation of human rights	Material	59	S1-17
Measures implemented to promote and comply with the provisions of the fundamental ILO conventions related to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour	Material	44	ESRS2 MDR-P S1-1
FIGHT AGAINST CORRUPTION AND BRIBERY			
Management approach: description and results of the policies related to these issues as well as the main risks related to them linked to the group's activities	Material	70	ESRS2 MDR-P G1-1
Measures taken to prevent corruption and bribery	Material	73	G1-3
Measures to combat money laundering	Material	73	G1-3
Contributions to foundations and non-profit entities	Material	80	GRI 2-28 (2021)
INFORMATION ABOUT THE COMPANY			
Management approach: description and results of the policies related to these issues as well as the main risks related to them linked to the group's activities	Material	70 61	ESRS2 MDR-P G1-1 S4-1
Company commitments to sustainable development			
Impact of the company's activity on employment and local development	Non material	N/A	N/A
Impact of the company's activity on local populations and the territory	Non material	N/A	N/A
Relations maintained with local communities and dialogue with them	Non material	N/A	N/A
Association or sponsorship actions	Non material	N/A	N/A
Subcontracting and suppliers			
Inclusion in the supplier policy of social, gender equality and environmental issues	Material	72	G1-2
Consideration of suppliers and subcontractors social and environmental responsibility	Material	72	G1-2

Supervision and audit results	Material	80	GRI 2-6 (2021) G1-2
Consumers			
Measures for the health and safety of consumers	Material	67 69	ESRS2 MDR-T ESRS2 MDR-A S4-4 Actions S4-5 Targets
Complaint systems, complaints received and their resolution	Material	66	S4-3
Tax information			
Benefits obtained country by country	Material	80	GRI 3-3 (2021)
Taxes on profits paid	Material	80	GRI 3-3 (2021)
Government grants received	Material	80	GRI 201-4 in regard to grants

7 **ANNEX III**

Acronyms

Acronym	Definition
BP	Basis for preparation of the Sustainability Statement
ESRS	European Sustainability Reporting Standards
FTE	Full-time equivalent
GAR	Green Asset Ratio
GOV	Governance
IRO	Impacts, risks and opportunities
SBM	Strategy Business Model



Wizink Bank, S.A.U. and subsidiaries

Limited Assurance Report issued by an
assurance provider on the Consolidated Non-
Financial Information Statement (NFIS) and the
Sustainability Reporting

31 de December de 2024

*(Translation from the original in Spanish. In the
event of discrepancy, the Spanish-language
version prevails.)*



KPMG Auditores, S.L.
Paseo de la Castellana, 259C
28046 Madrid

Limited Assurance Report issued by an assurance provider on the Consolidated Non-Financial Information Statement and the Sustainability Reporting of WiZink Bank, S.A.U. and subsidiaries for 2024

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the Sole Shareholder of WiZink Bank, S.A.U.:

Limited Assurance Conclusion

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the accompanying Consolidated Non-Financial Information Statement (hereinafter, NFIS) of WiZink Bank, S.A.U. (hereinafter, the Entity) and its subsidiaries (hereinafter, the Group) for the year ended 31 December 2024, which forms part of the consolidated directors' report of the Group.

The NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, namely the sustainability reporting prepared by the Group for the year ended 31 December 2024 (hereinafter, the Sustainability Reporting) in accordance with the provisions of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 on Corporate Sustainability Reporting (CSRD). This Sustainability Reporting has also been subject to a limited assurance review.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that:

- a) The Group's Non-Financial Information Statement for the year ended 31 December 2024 has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected criteria of the European Sustainability Reporting Standards (ESRS), as well as the other criteria described based on each subject area in the "6. ANNEX II Table linking the requirements of Law 11/2018, GRI and ESRS indicators" table of the aforementioned Statement;
- b) The Sustainability Reporting 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 the accompanying note "1.1.1. General basis for preparation of sustainability statement (BP1)", including:
 - That the description of the process for identifying the sustainability reporting information included in note "1.4.1. Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)" is consistent with the process carried out and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.

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- Compliance with ESRS.
- Compliance of the disclosure requirements, included in subsection “2.1 Disclosures pursuant to Article 8 of Regulation EU 2020/852 (Taxonomy Delegated Act)” of the environment section of the Sustainability Reporting, 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 for 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 Revised Guidelines 47 and 56 for assurance engagements on non-financial information issued by the Spanish Institute of Registered Auditors (ICJCE) and considering the contents of the note published by the Spanish Accounting and Audit Institute (ICAC) on 18 December 2024 (hereinafter, Generally Accepted Professional Standards).

The scope of the procedures applied in a limited assurance engagement is less than those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under this standard are further described in the Assurance Provider Responsibilities section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies the International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors' Responsibility

The preparation of the NFIS included in the consolidated directors' report of the Group, and the content thereof, is the responsibility of the Directors of WiZink Bank, S.A.U. The NFIS has been prepared in accordance with prevailing mercantile legislation and selected criteria of the ESRS, as well as the other criteria described based on each subject area in the “6. ANNEX II Table linking the requirements of Law 11/2018, GRI and ESRS indicators” table of the aforementioned Statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

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The Directors of WiZink Bank, S.A.U. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFIS was obtained.

In relation to the Sustainability Reporting, the entity's Directors are responsible for developing and implementing a process for identifying the information to be included in the Sustainability Reporting in accordance with the contents of the CSRD, the 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 Reporting in "1.4.1. Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)". This responsibility includes:

- understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment;
- identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term;
- evaluating the materiality of the impacts, risks and opportunities identified; and
- making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of the Sustainability Reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance of the CSRD, the ESRS and the disclosure requirements included in subsection "2.1 Disclosures pursuant to Article 8 of Regulation EU 2020/852 (Taxonomy Delegated Act)" of the environmental section of the Sustainability Reporting 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 necessary to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.

Inherent Limitations in the Preparation of the Information

In accordance with the ESRS, the Entity's Directors are required to prepare prospective information based on assumptions and hypotheses, which are to be included in the Sustainability Reporting, regarding events that may occur in the future, as well as any possible future actions that the Group may take. The actual outcome may differ significantly from the estimates, as future events often do not occur as expected.



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In determining sustainability disclosures, the Entity's Directors interpret legal and other terms that are not clearly defined and may be interpreted differently by others, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

Responsibility of the Assurance Provider

Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and Sustainability Reporting are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions thereon. 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 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 implement procedures to assess whether the process for identifying the information to be included in both the NFIS and Sustainability Reporting is consistent with the description of the process followed by the Group and allows, where appropriate, for the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures where material misstatements are more likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and the Sustainability Reporting that are likely to contain material misstatements. 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 of Work Performed

A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and scope of the procedures selected depend on professional judgement, including the identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and the Sustainability Reporting.

Our work consisted of making inquiries of management, as well as of the different units and components of the Group that participated in the preparation of the NFIS and the Sustainability Reporting, reviewing the processes for compiling and validating the information presented in the NFIS and the Sustainability Reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance process:

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- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2024 based on the materiality analysis performed by the Group and described in the section "1.4. Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)", considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2024.
- Review of the information relative to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2024.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2024 and whether it has been adequately compiled based on data provided by the information sources.

In relation to the assurance work on the Sustainability Reporting:

- Making inquiries of Group personnel:
 - to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain information necessary for the external review.
 - to understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents) and review the Group's internal documentation on its process.
- Through inquiries of Group personnel, gaining an understanding of the Group's processes for collecting, validating and reporting information relevant to the preparation of its sustainability reporting.
- Assessment of how consistent the evidence obtained from our procedures on the Group's process for determining the information to be included in the Sustainability Reporting is with the description of the process included in the Sustainability Reporting, and assessment of whether the Group's process duly identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessment of whether all the information identified in the Group's process for determining the information to be included in the Sustainability Reporting is effectively included.
- Assessment of how consistent the structure and presentation of the Sustainability Reporting is with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.
- Inquiries of relevant personnel and performance of analytical procedures on the information disclosed in the Sustainability Reporting considering where material misstatements are likely to arise, whether due to fraud or error.
- Performance of sample substantive procedures on information disclosed in the Sustainability Reporting considering where material misstatements are likely to arise, whether due to fraud or error.



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- Procurement of any reports issued by accredited independent third parties included as an appendix to the consolidated directors' report in response to the requirements of European regulations and, in relation to the information to which they refer and in accordance with Generally Accepted Professional Standards, confirmation solely that the accreditation of the assurance provider and the scope of the report issued is in line with European regulations.
- Procurement of any documents containing the information included by reference, the reports issued by auditors or assurance providers on those documents and, in accordance with Generally Accepted Professional Standards, confirmation solely that the document referred to by such information included by reference meets the conditions described in the ESRS for incorporating information by reference in the Sustainability Reporting.
- Procurement of a representation letter from the Directors and management regarding the NFIS and the Sustainability Reporting.

Other Information

Management of the entity is responsible for other information. Other information comprises the consolidated annual accounts and other information included in the consolidated directors' report, but does not include either the auditor's report on the consolidated annual accounts or assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the Sustainability Reporting included as an appendix to the consolidated directors' report.

Our assurance report does not cover other information and we do not express any assurance conclusions on said information.

In connection with our engagement to provide assurance on the Sustainability Reporting, our responsibility is to read the other information identified above and, in so doing, consider whether the other information is materially inconsistent with the Sustainability Reporting or with the knowledge we have acquired during the assurance engagement that could be indicative of material misstatements in the Sustainability Reporting.

KPMG Auditores, S.L.

(Signed on original in Spanish)

Marta Contreras Hernández

28 February 2025