



**STATEMENT OF NON-FINANCIAL INFORMATION 2022**

**RENTA 4 GROUP**

February 2023



## TABLE OF CONTENTS

1. BASES PARA LA FORMULACIÓN DEL ESTADO DE INFORMACIÓN NO FINANCIERA .....	4
2. INFORMACIÓN GENERAL .....	5
3. ANÁLISIS DE MATERIALIDAD .....	10
4. PROTECCIÓN DEL MEDIOAMBIENTE .....	11
5. GESTIÓN SOCIAL Y DEL PERSONAL .....	19
6. DERECHOS HUMANOS .....	36
7. CORRUPCIÓN Y SOBORNO.....	43
8. SOCIEDAD .....	48
9. COMPROMISO ESG .....	60
10. TAXONOMÍA UE 2022 RENTA 4 DE FINANZAS SOSTENIBLES .....	65
ANEXO I. ÍNDICE DE REQUERIMIENTOS DE LA LEY 11/2018.....	69





## **Statement of non-financial information of Renta 4 Group**

### **1. GUIDELINES FOR THE ELABORATION OF THE NON-FINANCIAL INFORMATION STATEMENT**

In accordance with Law 11/2018 of 28 December on non-financial information and diversity, the Board of Directors of Renta 4 Banco, S.A. (the Parent Company) and its group subsidiaries, hereinafter Renta 4, issues this Statement of Non-financial Information for the financial year 2022 as an annex to the Consolidated Management Report presented with the consolidated annual accounts.

This report is public and can be consulted on the corporate website <https://www.renta4banco.com/es>

Renta 4 has analysed the requirements of Law 11/2018, taking into account the opinion of its main stakeholders. To this end, the Group has identified the following stakeholders: customers, professionals, shareholders, the environment and suppliers.

The Renta 4 Group's business model, based on proximity and relationship with society, allows for continuous access to these stakeholders by all operating lines, control areas (risks, regulatory compliance, and internal audit), and, especially, senior management and members of the Board of Directors, who are fully aware of the most relevant aspects in the economic, social and environmental fields.

This continuous interrelationship leads to knowing each stakeholder's needs to establish lines of action, responding to them in a timely manner.

The Board of Directors of Renta 4 Banco, S.A. is ultimately responsible for all aspects arising from the management and control of the risks inherent to the activity carried out by the Renta 4 Group. Thus, at the request of the Board of Directors, a Risk Appetite Framework, different risk management policies, and risk control structures have been set up to ensure their correct application.

The Risk Appetite Framework is a statement of the aggregate level of risk types that the Renta 4 Group is willing to accept or avoid to achieve its business purposes. It is also a tool that uses metrics to monitor each of the risks, establishing different policies for appropriate risk management.

Therefore, the Risk Appetite Framework includes a commitment to economic and social sustainability, especially emphasising compliance with policies for the prevention of Anti-Money Laundering and Countering Financing of Terrorism, ESG, regulatory compliance, the code of conduct in stock markets (Internal Code of Conduct) and the handling of clients' complaints.

As shown in Annex I, "*Table of contents required by Law 11/2018, of 28 December*", the NFIR has been prepared following the Global Reporting Initiative (GRI) Standards selected, for those requirements



considered material for the business.

The scope of the information reported covers Renta 4 Banco, S.A. (the Parent) and its subsidiaries for the year 2022, both nationally and internationally.

## **2. GENERAL INFORMATION**

Renta 4 is composed of a number of companies dedicated to the provision of investment and asset management services, and Renta 4 Banco S.A. is the parent company. The most representative companies in terms of income and services offered within the Group are the following:



- Renta 4 Banco S.A.
- Renta 4 Gestora SGIIC S.A.
- Renta 4 Pensiones SGFP S.A.
- Renta 4 S.V. S.A.
- Renta 4 Corporate S.A.

Renta 4 operates mainly in the national territory, although a non-significant part of its activity is carried out in Chile, Colombia, Peru, and Luxembourg with similar clients and products offered in all the countries.

The Group's main business lines are as follows:

- Financial intermediation
- Portfolio management
- Management and marketing of investment funds and other collective investment institutions
- Management of pension funds
- Consultancy and Corporate Finance
- Development of solutions based on algorithmic models

## **Group Structure**

The activity of Renta 4 Banco, S.A. focuses mainly on the provision of investment and asset management services. The company has a network of 66 branches, of which 62 are located in the main capitals of the Spanish provinces, and the remaining 4 in each country described above, with an average total workforce of 633 employees.

The distribution network is complemented by sales agents and partners.

In addition, the Group has a website, [www.r4.com](http://www.r4.com), and an app, which offer its clients the possibility to operate in national and international markets.

In addition, it has numerous customer support services, including a telephone customer service with extended customer service hours, permanent access to market news, access to analyst databases on companies from all major stock exchanges, alert services, access to technical commentary and charting



tools.

The Group has also established offices in Peru and Chile, although clients in these two regions have the possibility of acquiring Renta 4 products through the website. Furthermore, a representative office and a company dedicated to the trust business are established in Colombia. The international business of Renta 4 is completed by the CII management company in Luxembourg.

## **History of the Group**

Renta 4 started in 1986 as an investment services company. In the beginning, it was dedicated to the purchase and sale of public debt. In 1989, the company became a Securities and Stock Exchange entity, registered under number 1 with the Comisión Nacional del Mercado de Valores (National Securities Market Commission), extending the range of investments from public debt to stock market brokerage. In 1987, Renta 4 Gestora SGIC, S.A. was incorporated, but it was not until 1991 that it began to manage collective investment schemes, establishing the first investment fund. Renta 4 Pensiones S.G.F.P. was established in 1997.

In the nineties, new offices were opened throughout the country until the current distribution network was formed. Between 1990 and 1995, 11 new offices were opened, having started with only three in 1990.

In 1999, the strategy of territorial expansion and the multi-channel philosophy led to the development of the online platform [www.renta4.com](http://www.renta4.com), which allowed the outsourcing of products and services through the network.

In 1999, a holding company was set up under the name of Renta 4 Servicios Financieros, S.L., which aligned the businesses of CII management and pension funds. In 2000, the intermediation business was integrated into the holding company.

From 2002 to 2004, Renta 4 began a process to rationalise the network through the acquisition and subsequent merger of several companies in which agents of the Renta 4 Group participated, giving rise to a fully integrated commercial structure.

In 2004, as part of the company's growth policy, Renta 4 Corporate was established while Gesdinco and Padinco were acquired in 2006.

On September 29, 2007, it became the first investment services company to float on the stock exchange.

In 2012, Renta 4 began to function as a bank by acquiring bank status from Banco Alicantino de



Comercio, S.A. and establishing the company Renta 4 Banco, S.A. As a result, Renta 4 Sociedad de Valores, S.A. was partially spun off in favour of Renta 4 Banco, S.A.

On June 25, 2015, the Spanish National Securities Market Commission appointed Renta 4 Gestora, SGIIC, S.A. as the provisional management company for the CIIs that had hitherto been managed by Banco Madrid Gestión de Activos, SGIIC, S.A.

In 2015 it incorporated a CII management company in Luxembourg and in early 2020 Renta 4 Gestora signed up to the United Nations Sustainable Investment Programme, the so-called Principles for Responsible Investment (PRI), whereby it undertakes to incorporate environmental, social and good corporate governance (ESG) factors in its investment decision-making.

### **Purpose, mission and vision of the company**

The purpose of Renta 4 Banco is to democratise investment so that every person, family, company or institution can benefit equally from a high-quality service to operate in financial markets and manage savings and investments. In other words, to offer an exclusive service with an inclusive approach to help clients protect and make the most of their savings and investments while managing risk.

In the current context of the financial markets and the uncertainty facing the sector, it connects with the Bank's mission as a Bank and as an investment company, which is to encourage investment to improve people's lives. We are moving towards a world of investors in which investment can and must play an essential role in moving towards a more sustainable and efficient world, and contribute to the progress of society. The Group wants to play an important role in this new financial system that will finance innovation and the positive transformation of the economy. And it will do so as it has always done, by allocating resources well and managing risks well, helping clients invest well and helping companies find the best financial solutions for their growth.

This vision is translated into a slogan that is communicated and disseminated internally (employees) and externally (society): "*PROMOTING INVESTMENT FOR THE PROGRESS OF PEOPLE AND SOCIETY*".

To successfully accomplish its corporate purpose, Renta 4 has established a consistent business model that coordinates strategies, structures, developments, and activities. This model can be summarised in the following two core values:

- (1) **To be a specialised bank** (in savings, investment, wealth and corporate services): because to be able to offer quality and excellence of service in a scalable way, it is necessary to focus the activity. To be the best in an activity and, based on this, to be "A SPECIALISED INVESTMENT BANK"



- (2) **A bank devoted to its clients:** To establish a long-term relationship of trust based on an expert, efficient and personalised service for every investor. A premise that is expressed as "*A BANK WHERE EVERY INVESTOR IS A BIG CLIENT*".

This business model with its brand allows Renta 4 to occupy a differential space on the map of banking or private banking entities.

Renta 4 is a "marketplace" for investments, but with a full banking license, that is its differential value. It differs from the large universal banks in that it specialises in wealth management and capital markets. It differs from smaller, boutique investment houses in that it offers the client a much more comprehensive range of solutions to clients' financial needs. This makes it possible to target a very broad segment of savers, from high net worth individuals to more modest investors or millennials. In short, it is a Bank with all the advantages of being a Bank, but operating as a specialised investment firm. This is why Renta 4 is a marketplace that aggregates investment solutions for a wide range of clients. There is no other bank specialised in investment listed on the Spanish stock exchange.

The business model must reinforce this differentiation as a key to its consistency and competitiveness. A model that, when it comes to people's savings and investments, bases its success and condition of permanence on building *TRUST*.

Renta 4 has a maxim that conveys this very idea: "*At Renta 4 we are not investment managers, we are investor managers*". The interests of their clients are paramount. Investors want to trust that there will always be someone to turn to if they have a problem, trust that what they are investing in is right for them, trust that the person advising them knows what they are talking about, trust the quality and reputation of the products and services offered by Renta 4, trust that they are charged fairly, trust that they are being offered what is right for them and not for the Group (we are not product placement agents). This *TRUST* is transmitted through:

- (1) **Caring:** The best way to transmit trust is through closeness, personal treatment, empathy, clear and transparent communication: *knowing your customers WELL*.
- (2) **Experience:** The experience that comes from being specialised and having spent more than 35 years dedicating ourselves exclusively to this on a day-to-day basis.
- (3) **Quality of service:** Because when it comes to money, every client wants to see that things are done well, with professionalism and experience, but also with caring and humanity. You have to be it and look like it.

And finally, these values must be surrounded by other aspects that in the current context are complementary, but fundamental for adapting to today's society: its habits and expectations.

- (1) **Technology:** A high-quality service requires a high level of efficiency, which can only be achieved through technology to obtain a profitable and viable model. Furthermore, technology



is necessary to offer users the comfortable, agile and ubiquitous experiences they demand. Growth can only happen if integration between physical and digital channels is achieved.

- (2) **Proactivity:** Renta 4 believes in anticipating clients' needs. The greatest satisfaction is felt when you notice that we provide solutions and ideas and that we talk to clients to better understand their needs, making investment decisions easier.
- (3) **Pedagogy:** The financial education and training of our clients are social responsibilities and we transfer this to every point of contact in the flow of the relationship. From the first communications to answer inquiries and provide information to in-person commercial processes at the offices.
- (4) **Sustainability:** Beyond the idea of sustainable investment, banking institutions play an important role in society and, as such, we must play a significant and committed role in improving the sustainability of the planet.

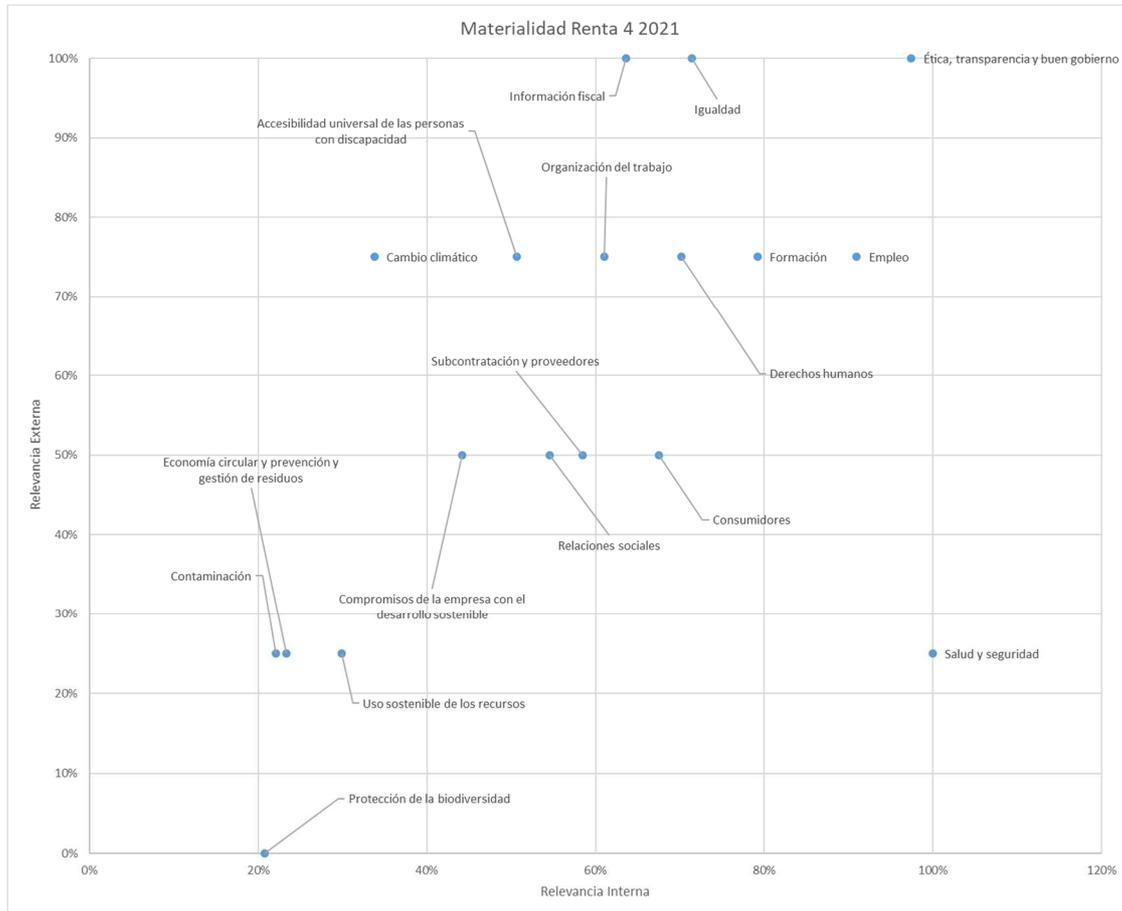
### **3. MATERIALITY ANALYSIS**

Renta 4 has carried out a materiality analysis in order to identify the most relevant issues for the company and thus, define its strategic priorities to make progress in the area of Corporate Social Responsibility.

This analysis has been carried out from both the internal and external points of view. For the internal analysis, Renta 4 conducted interviews with the heads of the most relevant areas, and for the external analysis, the most relevant stakeholders for the bank were considered.



The findings of this analysis are reflected in the following chart on Materiality:



#### 4. ENVIRONMENTAL PROTECTION

Renta 4 continues to implement and improve the characteristics of the environmental policy it has sought to implement over the years.

It should be noted that pollution is not a material impact from Renta 4's activity. Rather, gas emissions, light and noise pollution should be considered. Likewise, that is why it is not necessary to make provisions or guarantees on environmental risks, nor would it be necessary to take any action to avoid food waste.

This document presents information relating to Renta 4 at national and international level, including its head office, national branches and branches in Latin America.



Continuing with the environmental commitment made by Renta 4 in recent years, it continues to maintain a comprehensive strategy covering the following areas of action:

1. Reduction of energy consumption
2. Water use efficiency
3. Digital office - reducing paper, toner, and storage space use
4. Environmental management of waste by seeking alternatives to those generated within the context of the circular economy.
5. Promotion of respect for the environment and a transition to a low-carbon economy.
6. Biodiversity

### **1. Reduction of energy consumption**

In 2021, the total electricity consumption of the entire office network including the Paseo de la Habana headquarters at national level was 1,820,347.50 kWh. Internationally, consumption was 22,182.88 kWh <sup>1</sup>

In 2022, the total electricity consumption of the entire network, including the headquarters, was 1,739,511.31 kWh. Internationally, consumption was 60,341.26 kWh <sup>1</sup>.

<b>NACIONAL</b>	<b>2021</b>		<b>2022</b>	<b>2022vs.2021</b>
KWH SUCURSALES	1.173.679,74	KWH SUCURSALES	1.123.625,59	<b>-4,26%</b>
CENTRAL KWH	646.667,71	CENTRAL KWH	615.885,73	<b>-4,76%</b>
KWH TOTALES	1.820.347,45	KWH TOTALES	1.739.511,31	<b>-4,44%</b>

Looking exclusively at energy consumption, it is worth noting that, in terms of internal consumption, energy consumption in all branches and the head office have been reduced by 80,836.14kWh, a saving of 4.44% compared to last year, even though the area in m2 of branches nationwide has increased, normal post-pandemic activity has resumed and the number of staff has increased by 6.7% to 633 employees. In this respect, it should be noted that part of the reduction has been favoured by the teleworking policies that have been adopted in the company, in addition to the actions to optimise energy efficiency.

This energy efficiency can also be seen at Renta4's headquarters in Paseo de la Habana, which usually accounts for a large part of the national consumption, we note that, while in 2021 consumption stood at 646,668 kW, in 2022 this consumption has been reduced to 615,885.7kw, representing a decrease of 4.76%.

Continuing with the energy saving strategy applied in previous years both at the headquarters and in

<sup>1</sup> Data from the Renta4 Chile office could not be included



the new branches, existing lighting has been replaced with more energy efficient LED lighting, blinds have been installed and facility design has been modified to improve natural lighting and thermal comfort in the following branches:

- Renta4 Cullera Office  
*Passatge de l'Ullel, 2-Bj, Ed. Manantial, 46400, Cullera, Valencia*
  
- Renta4 Burgos Office  
*Calle Vitoria, 28, Bajo, 09004 Burgos*
  
- Renta4 Almería Office  
*Rambla Federico García Lorca, esq. Poeta Paco Aquino, 04005 Almeria*
  
- Renta4 Valencia Office  
*C/ Pintor Sorolla, 18-20, 46002 Valencia*

In order to reduce energy consumption, in 2022, the existing conventional air-conditioning system was replaced by a variable volume flow control system in the same four offices. In this way, the performance of the systems has been significantly optimised with consequent energy consumption that are believed to be between 25% and 30% lower than the previous centralised ON/OFF systems.

## **2. Water use efficiency**

In its strategy for the intelligent management of natural resources, Renta 4 continues to implement the improvements established previously, in order to implement a strategy and concrete objectives in this aspect of care and commitment to the environment.

In relation to this commitment, the water consumption of its network of offices has been monitored, obtaining the following data:

DETALLE CONSUMO AGUA (m <sup>3</sup> )				
	2019(*)	2020(**)(***)	2021(**)	2022(**)
CONSUMO AGUA RED OFICINAS NACIONAL	1.666	1.601	1.437	1.585
CONSUMO AGUA RED INTERNACIONAL	Sin datos	228	133	312
CONSUMO AGUA SEDE RENTA4	1.399	1.500	1.749	2.418
CONSUMO AGUA SEDE RENTA4 + RED NACIONAL	3.065	3.101	3.186	4.003
CONSUMO AGUA SEDE RENTA4 + RED NACIONAL E INTERNACIONAL	3.065	3.329	3.319	4.315

(\*) Solo contabilizadas 23 oficinas, ninguna internacional

(\*\*) Sin datos de Sevilla, Guadalajara, Segovia, Cuenca, Serrano, Almagro, Recoletos, Tarragona, Fuenlabrada, Perú, Lleida, Tarragona, Gran Canaria, Logroño, Málaga, Soria, Lleida, Guadalajara, Segovia, Cuenca, Almagro, Recoletos, Chile, Luxemburgo y Perú

(\*\*\*) confinamiento

For the time being, each of the years analysed have factors that differentiate them from the rest (2019 was the first year where this analysis was carried out and the data was not fully complete, 2020 was marked by confinement being imposed due to the COVID19 pandemic and 2021 had a high rate of teleworking). In 2022 a high level of data collection is maintained, but there are still a significant amount that could not be included (because the consumption of these is indirectly paid for within the respective communities in which the offices in question are located).

The strategy for responsible water consumption is yet to be determined. In the meantime, improvements are being implemented progressively in all office facilities to improve efficiency in the use of this resource (timed taps and dual-flush toilets). In 2022, these improvements have been applied to the following offices:

- Renta4 Cullera Office  
*Passatge de l'Ullel, 2-Bj, Ed. Manantial, 46400, Cullera, Valencia*
- Renta4 Burgos Office  
*Calle Vitoria, 28, Bajo, 09004 Burgos*
- Renta4 Almería Office  
*Rambla Federico García Lorca, esq. Poeta Paco Aquino, 04005 Almería*
- Renta4 Valencia Office  
*Plaza de San Agustín, 2, 46 Valencia*

### 3. Digital office - Reducing paper, toner, and storage space use

One of the most important measures implemented in Renta4 and which has a direct impact on the environment is office digitisation, seeking to reduce the consumption of ink and paper with the consequent economic savings that this entails.

With regard to ink toner consumption, the three years for which data are available are disparate and do not reflect a standardised situation with regard to confinement and the pandemic. 2021 is still considered as a year with widespread teleworking, while in 2022 teleworking was reduced, which is why toner consumption increased in 2022.

The following table has been compiled on the basis of these data:

DETALLE CONSUMO TONER (ud)				
	2019	2020*	2021	2022
CONSUMO TONER RED OFICINAS NACIONAL	No se dispone de datos	257	223	264
CONSUMO TONER RED INTERNACIONAL	No se dispone de datos	9	26	17
CONSUMO TONER SEDE RENTA4	No se dispone de datos	51	44	49
CONSUMO TONER SEDE RENTA4 + RED NACIONAL	No se dispone de datos	308	267	313
CONSUMO TONER SEDE RENTA4 + RED NACIONAL E INTERNACIONAL	No se dispone de datos	317	293	330

\*confinamiento por COVID19

To understand the use of this consumable, it is important to relate it to the growth of the company, establishing an indicator based on the number of employees. Analysing this indicator we see how the value of 2022 compared to the years of confinement (2020) and teleworking (2021), fell by 11% or grew by 5.5% respectively, while the number of staff grew by 17% compared to 2020 and 6.7% compared to 2021.

TONER - Total Renta 4	2020	2021	2022	2022 vs. 2020	2022 vs. 2021
Uds. toner	317	293	330	4,1%	12,6%
Nº Medio Total Empleados	541	593	633	17,0%	6,7%
ud. Toner/empl.	0,59	0,49	0,52	-11,0%	5,5%

TONER - Servicios Centrales	2020	2021	2022	2022vs.2020	2022vs.2021
Uds. toner	51	44	49	-3,9%	11,4%
Nº Medio Empleados Servicios Centrales	262	299	321	22,5%	7,4%
ud. Toner/empl.	0,19	0,15	0,15	-21,6%	3,7%

These improvements are even more significant when we look exclusively at the headquarters. These data show that the measures taken in this regard are having a positive and consistent effect. The continuity and improvement of these will be analysed.

With respect to paper consumption, the following table has been prepared:

	DETALLE CONSUMO PAPEL					
	2020(*)(**)		2021(***)		2022(***)	
	Nº HOJAS A4	KILOS PAPEL (5g/u)	Nº HOJAS A4	KILOS PAPEL (5g/u)	Nº HOJAS A4	KILOS PAPEL (5g/u)
CONSUMO RED NACIONAL DE OFICINAS	869.677	4.348	1.187.134	5.936	1.110.231	5.551
CONSUMO RED INTERNACIONAL DE OFICINAS	No se dispone de datos		5.520	28	21.510	108
CONSUMO SEDE CENTRAL RENTA 4 P. DE LA HABANA	636.111	3.181	707.993	3.540	781.492	3.907
CONSUMO SEDE CENTRAL + RED NACIONAL	1.505.788	7.529	1.895.127	9.476	1.891.723	9.459
CONSUMO SEDE CENTRAL + RED NACIONAL+RED INTERNACIONAL	1.505.788	7.529	1.900.647	9.503	1.913.233	9.566

(\*) confinamiento por COVID19

(\*\*) No se dispone de datos de Latam y Luxemburgo

(\*\*\*) No se dispone de datos de Chile y Luxemburgo

There was a slight increase in consumption in 2022 compared to 2021 (+0.7%). It is worth mentioning that the information is much more detailed for the last two years. The year 2020 was marked by the strict confinement due to the pandemic, and 2021 with still very intensive teleworking activity. 2022 is the first year after the pandemic that activity can be said to be the "new normal".

Therefore, the information obtained during this year 2022 can be established as a reliable basis for future observations and to determine whether the measures adopted are having an impact in the short and medium term.

Similarly, to understand the use of this consumable it is important to relate it to the growth of the company, establishing an indicator based on the number of employees. Analysing this indicator we see that the value of 2022 compared to 2021, fell by 5.7% while the average annual number of employees increased by 6.7%, indicating that the measures put in place are resulting in a much more responsible and efficient use of this consumable. Looking at headquarters alone, this indicator showed an increase of 2.8%, but staff numbers increased by 7.4%, which continues to demonstrate that responsible paper consumption is being made throughout the organisation.

IMPRESIÓN TOTAL RENTA 4	2021	2022	2022vs.2021
Páginas	1.900.647	1.913.233	0,7%
Nº Medio Total Empleados	593	633	6,7%
páginas/empl.	3.205	3.022	-5,7%

IMPRESIÓN SERVICIOS CENTRALES	2021	2022	2022vs.2021
Páginas	707.993	781.492	10,4%
Nº Medio Empleados Servicios Centrales	299	321	7,4%
páginas/empl.	2.368	2.435	2,8%



The data are positive and, in line with the objective of the PAPERLESS project, we will continue to take initiatives to ensure that these indicators continue to decrease.

In relation to Latin America, there are not yet sufficiently reliable data to be able to establish concrete targets for improvement and efficiency.

#### **4. Environmental management of waste by seeking alternatives to those generated within the context of the circular economy**

Renta 4 remains committed to "reducing" the amount of waste generated, "reusing" existing products as much as possible and "recycling" those that are no longer useful.

In this regard, Renta4 continues to reuse most of the existing furniture, while the furniture that is no longer useful for the required purposes is donated to non-profit associations.

During the 2022 financial year, Renta 4 has continued its commitment to secure IT waste management and destruction, following all the necessary procedures to ensure optimum security in the process. This avoids any kind of security breach with regard to the Group's information.

For this destruction, Renta 4 always relies on certified professionals in the sector to ensure the correct destruction of computer waste. In addition, the internal technical staff is always responsible for sending this waste for destruction once it has undergone a prior process of analysis, resetting and pre-destruction, thus ensuring that the waste is rendered unusable.

Finally, we continue to use certified materials that ensure that their procurement, manufacture and recycling are subject to a series of environmental requirements, seeking to reduce the carbon footprint they generate and valuing environmentally friendly and social aspects in the use of the products and services contracted.

#### **5. Promotion of respect for the environment and a transition to a low-carbon economy**

In the past 2021, the total electricity consumption of the entire office network including the Paseo de la Habana headquarters at national level was 1,820,347.50 kWh (as indicated above), of which 86.79% (1,579,891.69 kWh) came from renewable energy sources. This consumption represented an emission of 63.41 t CO<sub>2</sub><sup>2</sup>.

---

<sup>2</sup> Scope 2 emissions are accounted for as there is only electricity consumption. These have been calculated from emission factors provided by the Ministry. (Source CNMC (Comisión Nacional de los Mercados y Competencia), <http://qdo.cnmc.es/CNE/resumenGdo.do?>)

NACIONAL (RED OFICINAS Y SEDE)	2021	2022	%
KWH RED OFICINAS	1.173.679,74	1.123.625,59	-4,26%
SEDE CENTRAL KWH	646.667,71	615.885,73	-4,76%
KWH TOTALES	1.820.347,45	1.739.511,31	-4,44%
RED OFICINAS KWH <b>NO</b> RENOVABLES	195.189,02	287.959,41	47,53%
SEDE CENTRAL KWH <b>NO</b> RENOVABLES	45.266,74	50.902,40	12,45%
TOTAL KWH <b>NO</b> RENOVABLES	240.455,76	338.861,81	40,92%
% <b>NO</b> RENOV. RED OF..	20,5%	25,6%	5,14%
% <b>NO</b> RENOV TOTAL	13,2%	19,5%	6,27%
RED OFICINAS KWH RENOVABLES	978.490,72	835.666,18	-14,60%
SEDE CENTRAL KWH RENOVABLES	601.400,97	564.983,33	-6,06%
TOTAL KWH RENOVABLES	1.579.891,69	1.400.649,51	-11,35%
% RENOV TOTAL	86,79%	80,52%	-6,27%
RED INTERNACIONAL KWH	22.182,88	60.341,26	172,02%
CONSUMO TOTAL NACIONAL + INTERNACIONAL KWH	1.842.530,33	1.799.852,57	-2,32%
TOTAL KWH RENOVABLES	1.579.891,69	1.400.649,51	-11,35%
% RENOV TOTAL	85,75%	77,82%	-7,93%

In 2022, the electricity consumption of the entire national network, including the headquarters, was 1,739,511.31 kWh, of which 80.52% (1,400,649.51 kWh) came from renewable energy sources. This consumption resulted in an emission of 68.56 t CO<sub>2</sub><sup>3</sup>.

Latin America, on the other hand, consumed 60,341.26 kWh in 2022, all of which was non-renewable energy. This consumption generated a total of 11.6 t CO<sub>2</sub>.

Due to the fact that at the beginning of the year certain energy distribution companies switched their generation to a combined mix with other energy sources, Renta 4 reacted immediately and the contracts were renegotiated in order to recover electricity generation from renewable energy sources as soon as possible. In order to avoid these possible changes in the electricity generation policy of the suppliers and to be able to guarantee an agile and immediate reaction in the renegotiation, the company ALPE ENERGY has been contracted.

In this regard, if the plan established at the beginning of 2023 together with the company ALPE ENERGY continues, in 2024 100% of the electricity consumed by Renta 4 Banco in Spain (headquarters and national network of branches) will be generated by renewable energy sources.

<sup>3</sup> Scope 2 emissions are accounted for as there is only electricity consumption. These have been calculated from emission factors provided by the Ministry. (Source CNMC (Comisión Nacional de los Mercados y Competencia), <http://gdo.cnmec.es/CNE/resumenGdo.do?>)



If we consider other possible sources of CO2 generation:

- ✓ As in previous years, the headquarters has a diesel generator that turns on in the event of a power shortage, but it has not been activated in recent years.
- ✓ Furthermore, the company does not own vehicles. Therefore, the diesel consumption in 2022 from these sources has been zero.

In 2022, a very important step has been taken in the quest for decarbonisation. Renta 4 has established a methodology for calculating the carbon footprint in accordance with the GHG Protocol, for the calculation of scopes 1, 2 and 3 in accordance with the definition established therein. This model has been tested with the calculation of the carbon footprint for 2021 and, as MITECO data is updated, the footprint for 2022 will be recalculated. This detailed calculation of the carbon footprint will be carried out and reported in advance on an annual basis in order to establish decarbonisation as an SDG of the Group.

## **6. Biodiversity**

Renta 4 Banco has no impact on biodiversity thanks to the nature of its business and its location in urban areas.

## **5. SOCIAL AND PERSONNEL MANAGEMENT**

### **HR principles and values**

As an Group specialising in investment banking, asset management and advice, capital markets brokerage and corporate advice to companies, Renta 4's values include specialisation, quality, customer focus and proximity, all in a technological and digital environment.

In line with the above, in order to comply with these values, Renta 4's HR policies seek to recruit professionals who combine the following qualities, among others:



- ✓ Highly qualified professionals in order to provide high quality services of excellence.
- ✓ Business vocation, in which knowledge of each client is the basis for providing the best advice, thus establishing a long-term relationship of trust.
- ✓ Long-term professional development, in which employees can develop a career plan within the Group.

These HR policies are aimed at retaining and attracting talent, in order to have professionals with in-depth financial knowledge and extensive experience in the sector, considering Renta 4's human capital as a guarantee of quality in the banking services it provides to its customers and of business excellence.

All this in an environment of equal treatment and opportunities between women and men, promoting equality at all times in the selection and recruitment processes, in the development and career plans of its professionals, as well as implementing remuneration policies that ensure equity.

On the other hand, another of the principles on which Renta 4's HR policies are based is employment stability, promoting permanent contracts, with the aim of establishing long-term professional relationships in which employees can develop their professional careers at the Group.

## **Talent Selection**

Renta 4's recruitment process is based on recruiting professionals with a high level of training and experience appropriate to each position, assessing the suitability of each candidate, their training and professional merits, thus ensuring the suitability of each candidate for the position, in order to provide specialised and quality banking services.

One of the fundamental principles of this Recruitment Policy is equality, promoting the selection of the best qualified professionals for each position, not associating the required skills with gender.

The model to be followed when defining the posts is:

- ✓ Defining the job position and professional profile in a neutral way, avoiding associating skills with gender, always identifying them as professional competences and not as innate personal skills.



- ✓ Description of the job requirements and professional profiles of the candidates associated with the posts, being as precise as possible and adjusted to the real needs of the post.
- ✓ To assess experience and other job-specific competencies.

### **Structure and evolution of the workforce**

The Renta 4 group, as indicated above, is composed of the following companies:

- RENTA 4 BANCO, S.A. (Group parent company)
- RENTA 4 GESTORA SGIC, S.A.
- RENTA 4 PENSIONES SGFP, S.A.
- RENTA 4 CORPORATE, S.A.
- RENTA 4 S.A.S.V.

Renta 4 maintains its presence abroad in Chile, Peru, Colombia and Luxembourg.

Employees are distributed in each of these companies as follows:

<b><u>Empresa</u></b>	<b>Nº Empleados 31-12-2022</b>	<b>Nº Empleados 31-12-2021</b>
R4 SV	3	3
R4 Banco	445	423
R4 Gestora	78	76
R4 Pensiones	14	13
R4 Corporate	13	14
R4 Investment Solutions		5
Chile	33	30
Peru	21	21
Colombia	23	20
Luxemburgo	3	3

**TOTAL PLANTILLA**

**633**

**608**

With regard to the evolution of the Renta 4 workforce, it should be noted that since its creation in 1986, the number of employees has grown steadily, with the aim of ensuring that this growth is stable, structural and in line with the growth of the Group.

Renta 4's staff is distributed, as shown in the table below, between Spain, Chile, Peru, Colombia and

Luxembourg. At the national level, there are 320 employees in the Central Services and 233 employees in the 62 offices distributed throughout the country and at the international level in the three offices in Latin America and the one in Luxembourg. 87% of the workforce is located in Spain and 13% abroad.

The evolution of the workforce in recent years has been positive, increasing at a moderate pace, adapting at all times to the needs that have arisen in the different areas, new lines of business and increased activity.

**Evolución y distribución Geográfica Plantilla Renta 4**

	2015	2016	2017	2018	2019	2020	2021	2022	% Plantilla
<b>Internacional</b>	<b>31</b>	<b>44</b>	<b>42</b>	<b>49</b>	<b>57</b>	<b>63</b>	<b>74</b>	<b>80</b>	<b>13%</b>
<b>Nacional</b>	<b>397</b>	<b>417</b>	<b>427</b>	<b>456</b>	<b>465</b>	<b>497</b>	<b>534</b>	<b>553</b>	<b>87%</b>
Central	193	219	223	242	251	278	306	320	51%
Red	204	198	204	214	214	219	228	233	37%
<b>TOTAL</b>	<b>428</b>	<b>461</b>	<b>469</b>	<b>505</b>	<b>522</b>	<b>560</b>	<b>608</b>	<b>633</b>	
Δ Variación %		8%	2%	8%	3%	7%	9%	4%	

In this regard, the net annual increase in the workforce in 2022 compared to 2021 was 4.11%, slowing down compared to the previous two years.

On the other hand, Renta 4 seeks employment stability, as this is one of the principles on which Renta 4's HR policies are based, as it is considered a guarantee of the quality of the banking service provided and a fundamental pillar of trust with customers.

This stability is reflected on 31 December 2022 in the fact that 99.2% of the workforce has a permanent employment relationship, thus maintaining the trend of recent years.

The type of contracts, classified by gender, age and professional categories for the financial years 2022 and 2021, is shown below:

**Nº Contratos Final Periodo 2022-2021**

Tipo de Contrato según Género	2022				2021			
	Hombre	Mujer	Total	% Total	Hombre	Mujer	Total	% Total
Contrato Indefinido TC	418	199	617	97,5%	389	199	588	96,7%
Contrato Indefinido TP		11	11	1,7%	1	11	12	2,0%
Contrato Temporal TC		2	2	0,3%	4	2	6	1,0%
Contrato Temporal TP	2	1	3	0,5%	1	1	2	0,3%
<b>TOTAL</b>	<b>420</b>	<b>213</b>	<b>633</b>	<b>100,0%</b>	<b>395</b>	<b>213</b>	<b>608</b>	<b>100,0%</b>

Tipo de Contrato según Categoría	2022				2021			
	Directivo	Tecnico	Administrativo	Total	Directivo	Tecnico	Administrativo	Total
Contrato Indefinido TC	13	537	67	617	13	509	66	588
Contrato Indefinido TP		4	7	11	0	4	8	12
Contrato Temporal TC		1	1	2	0	3	3	6
Contrato Temporal TP		1	2	3	0	1	1	2
<b>TOTAL</b>	<b>13</b>	<b>543</b>	<b>77</b>	<b>633</b>	<b>13</b>	<b>517</b>	<b>78</b>	<b>608</b>

Tipo de Contrato según Horquilla Edad	Horquillas Edad									
	2022					2021				
	<30	[30-40]	[40-50]	>50	TOTAL	<30	[30-40]	[40-50]	>50	TOTAL
Contrato Indefinido TC	104	170	210	133	617	99	162	206	121	588
Contrato Indefinido TP		5	3	3	11	1	5	4	2	12
Contrato Temporal TC	1		1		2	4	0	1	1	6
Contrato Temporal TP				3	3	0	0	0	2	2
<b>TOTAL</b>	<b>105</b>	<b>175</b>	<b>214</b>	<b>139</b>	<b>633</b>	<b>104</b>	<b>167</b>	<b>211</b>	<b>126</b>	<b>608</b>

**PROMEDIO Contratos 31-12-2022**

Promedio Tipos de Contrato según género	Género			
	Hombre	Mujer	TOTAL	% Total
Contrato Indefinido TC	409,34	203,83	613,17	96,9%
Contrato Indefinido TP	1,00	11,00	12,00	1,9%
Contrato Temporal TC	3,58	2,50	6,08	1,0%
Contrato Temporal TP	1,00	0,67	1,67	0,3%
<b>TOTAL</b>	<b>414,92</b>	<b>218,00</b>	<b>632,92</b>	<b>100,0%</b>

Promedio Tipo de Contrato según Categoría	Categorías			
	Directivo	Tecnico	Administrativo	Total
Contrato Indefinido TC	13,00	533,75	66,42	613,17
Contrato Indefinido TP	-	4,00	8,00	12,00
Contrato Temporal TC	-	3,25	2,83	6,08
Contrato Temporal TP	-	1,00	0,67	1,67
<b>TOTAL</b>	<b>13,00</b>	<b>542,00</b>	<b>77,92</b>	<b>632,92</b>

Promedio Tipo de Contrato según Horquillas Edad	Horquillas Edad				Total
	<30	[30-40]	[40-50]	>50	
Contrato Indefinido TC	99,25	171,17	208,50	134,25	<b>613,17</b>
Contrato Indefinido TP	1,00	5,00	3,00	3,00	<b>12,00</b>
Contrato Temporal TC	4,25	-	1,00	0,83	<b>6,08</b>
Contrato Temporal TP	-	-	-	1,67	<b>1,67</b>
<b>TOTAL</b>	<b>104,50</b>	<b>176,17</b>	<b>212,50</b>	<b>139,75</b>	<b>632,92</b>

\* El promedio anual de contratos se ha calculado como una media del nº de contratos al final de cada uno de los meses

Another indicator of employment stability at Renta 4 is the length of service of its workforce, with an average of 10 years of service in 2022.

Años Antigüedad Media	2022			2021		
	Hombre	Mujer	Total	Hombre	Mujer	Total
Central	9,1	8,7	<b>9,0</b>	9,3	8,1	<b>8,8</b>
Red	12,4	16,8	<b>13,7</b>	12,2	16,1	<b>13,4</b>
Internacional	3,1	2,8	<b>3,0</b>	3,1	2,4	<b>2,9</b>
<b>Antigüedad Media General</b>	<b>9,6</b>	<b>10,8</b>	<b>10,0</b>	<b>9,6</b>	<b>10,2</b>	<b>9,8</b>

The average age of the workforce is 40 years, reflecting the fact that a high percentage of employees develop their careers at Renta 4, as shown below:

There were a total of 39 employees who left the Group in 2022 at national level, of which 12 were non-voluntary departures. A breakdown of non-voluntary departures by category, gender and age is given below:

**BAJAS no voluntarias 2022-2021**

Categoria	2022			2021			% variación
	Hombre	Mujer	TOTAL	Hombre	Mujer	TOTAL	
Directivo			0	0	0	0	0%
Técnico	5	6	11	6	2	8	38%
Administrativo		1	1	1	0	1	0%
<b>TOTAL</b>	<b>5</b>	<b>7</b>	<b>12</b>	<b>7</b>	<b>2</b>	<b>9</b>	

Categoria	2022									
	<30		[30-40]		[40-50]		>50		TOTAL	
	Hombre	Mujer								
Directivo			0	0	0	0	0	0	0	0
Técnico		1	1	1	2	3	2	1	5	6
Administrativo			0	0	0	0	0	1	0	1
<b>TOTAL</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>5</b>	<b>7</b>

Categoria	2021									
	<30		[30-40]		[40-50]		>50		TOTAL	
	Hombre	Mujer								
Directivo	0	0	0	0	0	0	0	0	0	0
Técnico	2	0	1	1	1	0	2	1	6	2
Administrativo	1	0	0	0	0	0	0	0	1	0
<b>TOTAL</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>7</b>	<b>2</b>

On the other hand, Renta 4 has a low level of turnover, 1.93% for the financial year 2022 similar to the financial year 2021, which was 1.03%, calculated only with non-voluntary departures, being a level of turnover considered as "healthy".

On this point, we would also like to highlight that Renta 4 did not make any ERTE or ERE during 2022.

## Remuneration

Renta 4 has a Remuneration Policy that aims to attract and retain talent, incorporating highly qualified professionals, applying remuneration levels in line with the market, depending, among other things, on the different job positions, level of responsibility, experience, qualifications and performance.

This Remuneration Policy is based on equality and non-discrimination criteria, pursuing pay equity. In this sense, Renta 4 establishes remuneration levels that combine internal equity within the company and external equity, with the aim of being competitive and attractive in terms of salaries in the market and with an annual performance evaluation system, all with the aim of having the best professionals in the sector, in order to offer a service of quality and excellence.

Renta 4 at all times applies the legal regulations in effect in each of the countries in which it operates and has a presence, as well as the different collective bargaining agreements applicable at national level, highlighting that, in general terms, the salary levels of Renta 4 employees are higher than those established in these agreements or regulations.

This NFIR uses the same classification of professional categories as is used in the Annual Accounts

containing the Group's financial information and in the various financial statements reported to the supervisors.

The average remuneration of employees and its evolution is shown in the following tables according to geographical distribution, age, gender and professional classification:

Remuneracion Media - Horquillas Edad-Area	Nacional			Internacional		
	2022	2021	Variacion % Periodo	2022	2021	Variacion % Periodo
<30	29.512	28.441	4%	19.774	15.040	31%
[30-40]	45.184	43.251	4%	43.189	41.118	5%
[40-50]	66.225	62.535	6%	71.288	47.379	50%
>50	90.754	85.511	6%	36.951	34.856	6%
<b>Remuneracion Media Total</b>	<b>60.711</b>	<b>57.082</b>	<b>6%</b>	<b>41.707</b>	<b>33.859</b>	<b>23%</b>

Remuneracion Media - Categoria-Areas	2022	2021	Variacion % Periodo
<b>Internacional</b>	<b>41.707</b>	<b>33.859</b>	<b>23%</b>
Directivo	158.977	126.754	25%
Tecnico	41.362	32.998	25%
Administrativo	11.698	15.309	-24%
<b>Nacional</b>	<b>60.711</b>	<b>57.082</b>	<b>6%</b>
Directivo	336.051	282.394	19%
Tecnico	58.561	55.845	5%
Administrativo	31.936	30.050	6%
<b>Total general</b>	<b>58.309</b>	<b>54.255</b>	<b>7%</b>

Remuneracion Media - Categoria-Areas	2022		2021		Variacion % Periodo	
	Hombre	Mujer	Hombre	Mujer	Hombre	Mujer
<b>Internacional</b>	<b>48.266</b>	<b>23.281</b>	<b>37.908</b>	<b>22.926</b>	<b>27%</b>	<b>2%</b>
Directivo	158.977	-	126.754	-	25%	-
Tecnico	46.637	25.831	36.297	24.385	28%	6%
Administrativo	14.487	7.980	17.514	9.796	-17%	-19%
<b>Nacional</b>	<b>66.514</b>	<b>49.799</b>	<b>63.447</b>	<b>45.835</b>	<b>5%</b>	<b>9%</b>
Directivo	342.535	306.870	291.485	241.483	18%	27%
Tecnico	61.191	52.261	59.059	48.607	4%	8%
Administrativo	29.063	33.006	27.722	30.901	5%	7%
<b>Total general</b>	<b>63.951</b>	<b>47.184</b>	<b>59.956</b>	<b>43.684</b>	<b>7%</b>	<b>8%</b>

With regard to the average remuneration of employees shown in the above tables, it should be noted, on the one hand, that there is a difference between the average remuneration at national and international level, due to several reasons, (i) the heterogeneity of the labour markets in which Renta 4 has a presence; Spain, Chile, Peru, Colombia and Luxembourg, which are not comparable in terms of salaries, (ii) the level of turnover in Latin America, which is much higher than in Spain, (iii) the



diversity of international profiles and positions in terms of functions, experience and responsibilities and (iv) the exchange rate applied each year.

On the other hand, there is a difference in the average remuneration at national level between men and women, specifically in the professional category of the Technical group, where the largest number of employees of the Group is concentrated, 85% of the staff, the reason for this difference being the wide variety of jobs that fall into this category, with different types of functions, responsibility, experience and seniority and, therefore, a wide range of remuneration.

However, as indicated above, Renta 4 has a Remuneration Policy based on criteria of equality and non-discrimination between men and women, with which it seeks to achieve equal pay, using a “job map” which establishes the salary levels for each position based on responsibility, functions and experience, for each new employee who joins the Group, regardless of gender. In addition, an individual performance evaluation is carried out annually in which quantitative and/or qualitative objectives are established for each department and area, thus determining the degree of achievement of these objectives, based on individual performance and similarly irrespective of gender.

On the other hand, we highlight that at national level, as shown in the table above, wage increases in 2022 compared to 2021 have been higher for women than for men, thus reducing the difference in the average wage level.

Renta 4 has calculated the salary gap (the difference in % between the average salary of men and that of women) according to the average remuneration for different professional categories, differentiating between national and international levels, the results of which are shown in the following tables.

**REMUNERACION TOTAL <sup>(1)</sup> 2022-2021**

Internacional	MEDIANA		Brecha Salarial 2022	MEDIANA		Brecha Salarial 2021	Variacion Brecha Salarial 2022/2021
	2022			2021			
	Hombre	Mujer		Hombre	Mujer		
Directivo	158.977	-	(2)	126.754	-	(2)	
Tecnico	25.975	20.615	20,6%	23.063	22.652	1,8%	1061%
Administrativo	10.634	5.901	44,5%	12.971	9.796	24,5%	82%

Nacional	MEDIANA		Brecha Salarial 2022	MEDIANA		Brecha Salarial 2021	Variacion Brecha Salarial 2022/2021
	2022			2021			
	Hombre	Mujer		Hombre	Mujer		
Directivo	314.536	306.870	2,4%	257.414	241.483	6,2%	-60,6%
Tecnico	50.000	48.000	4,0%	47.000	45.000	4,3%	-6,0%
Administrativo	27.000	31.500	-16,7%	26.000	30.000	-15,4%	8%

(1) Remuneracion Total incluye la Remuneracion Fija y Remuneracion Variable

(2) No existe Brecha salarial al no contar con mujeres en la categoria de Directivo

The different factors that may influence the results of the pay gap at national level, as discussed above, are that within these occupational categories there are different subcategories and jobs with different functions, responsibilities, experience, seniority and therefore pay. In the 2022 financial year, it is worth noting the reduction of the salary gap compared to 2021 in the Management and Technical categories, where the largest number of employees is to be found.

At the international level, the exchange rate and the different salary levels and differences in the labour markets in each of the countries in which Renta 4 has an international presence have an additional influence, although in all of them, Renta 4 applies the regulations and salary levels in force in each of them. In this sense, in 2022 there has also been an increase in the salary gap, which has been caused by an increase in the rotation of the female workforce and, in turn, by the incorporation of female professionals with a lower level of experience, whose remuneration is therefore lower but in line with the level of experience provided. In this regard, it should be noted that at all times we strictly comply with the regulations of each of the countries in which Renta 4 is present, where we also apply an Equality Policy, in which equal pay is applied.

Also, the average remuneration in euros received in 2022 by the members of the Board of Directors of Renta 4 by gender is shown below:

Remuneracion Media	2022				2021				Variacion Remuneracion Media 2022/2021			
	Hombre	Mujer	P. Juridica	Total	Hombre	Mujer	P. Juridica	Total	Hombre	Mujer	P. Juridica	Total
Consejeros Ejecutivos	415.000	-	-	415.000	354.000	-	-	354.000	17%			17%
Consejeros No Ejecutivos (1)(2)	80.000	80.000	-	80.000	60.000	60.000	71.000	61.000	33%	33%	*	31%
<b>Remuneracion Media Total</b>	<b>214.000</b>	<b>80.000</b>	<b>-</b>	<b>176.000</b>	<b>207.000</b>	<b>60.000</b>	<b>71.000</b>	<b>145.000</b>	<b>3%</b>	<b>33%</b>		<b>21%</b>

(1) Remuneracion Anualizada Ejercicio 2021 y 2022

(2) Remuneración como miembro del Consejo. Adicionalmente, los consejeros no ejecutivos que sean miembros de alguna de las comisiones del consejo percibirán una remuneracion adicional

(\*) A 31-12-22 Renta 4 no cuenta con ningun consejero no ejecutivo en la categoria de persona juridica



It should be noted that non-executive Directors receive remuneration for their being on the Board and, in addition, those who are members and participate in the Board committees receive additional remuneration in this respect. Whereas the remuneration of executive directors is linked and associated with their executive functions at Renta 4 and not with their status as directors.

## **TRAINING**

Renta 4 considers the training of its employees to be a fundamental and strategic value in an environment of digital transformation, being necessary for the provision of specialised and quality investment services, as well as being a differentiating factor in the banking and financial sector.

With regard to compliance with *MiFID II* regulations on the qualification and certification of professionals who advise and inform clients, it should be noted that 93% of employees in the commercial network or who perform advisory functions at Renta 4 currently hold one of the qualifications considered valid by the CNMV to comply with these regulations. Of these, 77% hold a *European Financial Advisor (EFA)*, *European Financial Planner (EFP)* and/or *European Information Planner (EIP)* qualification, are members of the *European Financial Planning Association (EFPA)* and are recertified through the EFPA. In addition, Renta 4 offers continuous training to employees who have obtained their training through other schools, although these are recognised as valid qualifications by the CNMV.

On the other hand, less than 7% of the commercial network or employees performing advisory functions do not have any of the qualifications considered valid. However, RENTA 4 has measures in place: (i) to encourage the training of these employees, (ii) to enable them to provide services to customers under the supervision of a colleague who meets the training and experience requirements, and (iii) to enable them to undertake specific training in subsequent years to obtain one of these



qualifications.

In this regard, it should be noted that since 2006, many years before the *MiFID II* regulations came into effect, making it compulsory for professionals in the financial sector to have certifications approved by the regulatory bodies, Renta 4 had been training all the professionals in its commercial network who advise clients in order for them to obtain the EFA qualification, as it considered that this training in financial products, taxation, financial planning, regulations and other basic aspects of the markets was a guarantee of quality in advising clients.

During the financial year 2022, besides the training aimed at obtaining EFA or other similar qualifications valid for the CNMV, Renta 4 has offered different training opportunities for employees of the different companies of the Group, which amounted to more than 12,400 hours of training.

Furthermore, Renta 4 has a Permanent Training Plan, which includes different training designed to provide employees with the knowledge, skills, and competences across every area and department of the company, depending on the training needs of a particular moment.

Specifically, during the financial year 2022, the following training and number of hours was carried out, as well as the distribution by category:

<b>Categoría</b>	<b>Nº Horas</b>
Tecnico	11.388,43
Administrativo	1.019,35
<b>TOTAL HORAS FORMACION</b>	<b>12.407,78</b>



<b>Denominacion Acción Formativa</b>	<b>Nº Horas</b>
“Asesoramiento Telefónico” Actitudes y prácticas de venta telefónica	60,00
Curso de Contabilidad Práctica	39,00
ELASTIC STACK	126,00
FORMACIÓN BACKEND JAVA DEVELOPER	720,00
Formación Data - Pentaho	58,00
Formación de acceso para la distribución de Seguros Nivel 2 - Grupo I	7.842,91
Formación Online en Flutter	40,00
IMPULSO COMERCIAL - GRUPO 13	170,64
IMPULSO COMERCIAL - GRUPO 14	158,29
IMPULSO COMERCIAL - GRUPO 15	155,51
IMPULSO COMERCIAL - GRUPO 16	159,17
IMPULSO COMERCIAL - GRUPO 17	166,89
IMPULSO COMERCIAL - GRUPO 18	183,35
Máster en Doble Titulación (Blockchain Management y Blockchain Engineering)	50,00
Programa Superior en Gestión Patrimonial PSGP - 2022	2.086,02
PROGRAMMATIC DEVELOPMENT APEX & VISUALFORCE IN LIGHTNING EXPERIENCE	320,00
PROMETHEUS-GRAFANA	72,00
<b>TOTAL HORAS FORMACION</b>	<b>12.407,78</b>

Finally, it should be noted that since 2021 Renta 4 has been training its employees in ESG (Environmental, Social and Governance), and currently more than 95% of them have received such training.

## **SOCIAL RELATIONS**

Renta 4 does not have a collective bargaining agreement at the Group level; the company applies the corresponding collective bargaining agreement to each of the companies and employees at the national level, according to their sector of activity, with the following agreements being applicable:



<u>Empresa</u>	<u>Convenio Colectivo</u>
R4 SV	Convenio Mercado de Valores
R4 Banco	Convenio Banca
R4 Gestora	Convenio Oficinas y Despachos de Madrid
R4 Pensiones	Convenio Oficinas y Despachos de Madrid
R4 Corporate	Convenio Oficinas y Despachos de Madrid
Chile	No Convenio
Peru	No Convenio
Colombia	No Convenio
Luxemburgo	No Convenio

As of 31 December 2021, 87.36% of Renta 4's employees were covered by one of the aforementioned Spanish collective bargaining agreements, while the remaining 12.64% of the workforce is not covered by such agreements, as they provide their services in the companies abroad. In this regard, it should be noted that Renta 4 complies and applies at all times with the regulations in force in each of these countries: Chile, Peru, Colombia and Luxembourg. Despite the heterogeneous nature of the applicable collective agreements, an attempt is made to apply homogeneous criteria and measures regarding work organisation, always seeking the benefit of Renta 4's employees based on internal and external equity in the country and abroad.

With regard to social relations, Renta 4 does not have legal employee representation. However, the Group keeps all its employees duly informed about the different policies and measures that the Company applies in the different areas, using the available communication channels, including the Employees' Portal, the company's intranet and communications sent by email.

The Group has an Equality Plan, in accordance with the applicable Spanish law, to achieve equal treatment and opportunities for women and men, adopting and implementing different policies aimed at this purpose, such as the promotion and guarantee of equal opportunities for selection and professional development at all levels of the company, policies adapted to different social changes, and equity in the remuneration policy.

As well, Renta 4 has a Protocol for the Prevention, Treatment, and Elimination of Sexual Harassment on the Grounds of Gender and Discrimination.

In addition, as of 31 December 2021, Renta 4 has five employees with proven disabilities.

### **WORK ORGANISATION**

Renta 4 has always aimed to improve the balance and compatibility between the personal, family and work life of all its employees, improving the working environment, increasing productivity and measures aimed at retaining talent, to which end various measures have been implemented in recent years, such as



- ✓ Working hours (annual estimate of 1,700 hours) that do not exceed the amount established in applicable collective agreements. Flexibility measures in clocking in/out and in break or food times, whenever the characteristics of the position and work centre allow it.
- ✓ Adaptation of the working day duration and distribution, including teleworking duly justified and reasoned.
- ✓ During the financial year 2022, a hybrid teleworking model has been maintained in those departments of the central services where, due to the type of work and systems used, it is feasible to combine face-to-face and telematic work, without exceeding 30% of teleworking time.
- ✓ All workers shall have the right to suspend their employment contract in case of birth, adoption, and fostering within the terms and means established by the Law, allowing the worker to enjoy such permits on a part-time basis, subject to agreement with the Company.
- ✓ Employees may take one hour of breastfeeding leave per day until their child reaches 9 months of age, which may be split into two periods, one at the beginning and one at the end of the working day. Similarly, they may replace the breastfeeding leave for a period of 15 working days. This permission may be extended until the child reaches 12 months of age, provided that it is enjoyed simultaneously, with a proportional reduction in salary.
- ✓ Workers shall have the right to reduce working hours to a maximum of half of the working day and a minimum of one-eighth of the working day for legal guardianship and/or direct care of a family member, and a proportional reduction in salary shall be considered following the specifications established in applicable collective agreements and regulations.
- ✓ Employees will be entitled to request leaves of absence for several reasons, including the care of children and direct family members, preserving their job or the same professional group, and the exercise of a public position that is incompatible with their job, following the regulations established in applicable collective agreements and regulations.
- ✓ Employees may request unpaid leaves in case of, for example, duly accredited family needs, care of relatives up to the first degree of consanguinity or affinity, and the completion of higher education or PhDs.
- ✓ Renta 4 has a Digital Disconnection Policy.

With regard to the absenteeism figures relating to suspensions for childbirth and childcare (maternity and paternity), as well as those relating to occupational accidents, the data on the number of absence hours during 2022 and 2021 are shown below:

**Nº Horas Absentismo por nacimiento y cuidado de menor**

	2022	2021
Tipo suspensión	Horas totales de absentismo (*)	Horas totales de absentismo (*)
Maternidad	5.200,25	7.099,00
Maternidad tiempo parcial	232,50	
Paternidad	6.324,00	2.619,50
Paternidad tiempo parcial	705,25	
<b>TOTAL</b>	<b>12.462,00</b>	<b>9.718,50</b>

\*The number of absenteeism hours has been calculated taking into account the number of effective daily working hours (7.75 hours per day working hours)  
(full time or its part-time equivalent) for the number of working days of absence

During the financial year 2022, there were a total of seven occupational accidents, of which only three resulted in medical leave.

With regard to the diagnostic leaves such as COVID-19, there were a total of 29 in 2022, which even if considered a Temporary Incapacity due to Common Contingency in accordance with current regulations, being similar to a sick leave due to an Occupational Accident in terms of benefits, which is why they are included in this classification, besides their relevance in recent years in terms of the absence hours they give rise to. Highlighting the reduction in the incidence of the disease during the financial year 2022.

The following tables show the number of occupational accidents according to their classification, seriousness and frequency, as well as the number of absence hours due to these accidents, distributed by gender and including the classification COVID-19.

**Nº Horas Absentismo por Accidente Laboral**

Tipo Accidente Laboral	Horas totales de absentismo (*)	
	2022	2021
<b>In itinere</b>		<b>353,87</b>
Hombre		98,12
Mujer		255,75
<b>Resto</b>	<b>790,50</b>	-
Hombre	775,00	-
Mujer	15,50	-
<b>COVID-19</b>	<b>864,61</b>	<b>2.363,78</b>
Hombre	573,50	1.488,00
Mujer	291,11	875,78
<b>TOTAL</b>	<b>1.655,11</b>	<b>2.717,64</b>

\*Absence hours have been calculated considering effective working hours per day (7.75 hours per day, full time, or its equivalent on a part-time basis) by the number of working days of absence

Severity rate= (Days off\*1000)/(No. of hours worked in period\*average workers)

Frequency rate= (No. of occupational accidents with leave\*1,000,000)/(No. of hours worked in the period\*average number of employees)



**Nº Accidentes Laborales**

Tipo Accidente Laboral	2022			2021		
	Nº de accidentes	Indice de Gravedad	Indice de Frecuencia	Nº de accidentes	Indice de Gravedad	Indice de Frecuencia
<b>in itinere</b>	<b>4</b>	<b>0,000</b>	<b>0,000</b>	<b>4</b>	<b>0,000</b>	<b>0,000</b>
Hombre	2	0,000	0,000	2	0,000	0,000
Mujer	2	0,000	0,000	2	0,000	0,000
<b>Resto</b>	<b>3</b>	<b>0,100</b>	<b>2,788</b>	<b>1</b>	<b>0,000</b>	<b>0,000</b>
Hombre	2	0,093	1,859	1	0,000	0,000
Mujer	1	0,007	0,929	0	0,000	0,000
<b>Covid-19</b>	<b>0</b>	<b>0,110</b>	<b>0,000</b>	<b>0</b>	<b>0,305</b>	<b>0,000</b>
Hombre	0	0,069	0,000	0	0,190	0,000
Mujer	0	0,041	0,000	0	0,114	0,000
<b>TOTAL</b>	<b>7</b>	<b>0,21</b>	<b>2,79</b>	<b>5</b>	<b>0,30</b>	<b>0,00</b>

*Índice de gravedad= (Días de baja\*1.000)/(Nº horas trabajadas en el periodo\*media trabajadores)*

*Índice de frecuencia= (Nº de accidentes laborales con baja\*1.000.000)/(Nº horas trabajadas en el periodo\*media trabajadores)*

In financial year 2022, Renta 4 continues to have no employees with any diagnosed occupational disease.

**HEALTH AND SAFETY**

For Health and Safety at Work, Renta 4 has hired an External Occupational Risk Prevention Service from the company VALORA PREVENCIÓN that includes the provision of monitoring services for preventive activities in health and occupational risks.

Thus, Renta 4 complies with the regulations on prevention, carrying out the risk assessment in the facilities of the 62 offices it has nationwide, as well as the risk assessment of the different job positions that exist in the company.

Regarding health control, Renta 4 offers all its employees the possibility of having a complete medical examination on an annual basis. The purpose of these voluntary medical check-ups is to provide employees with information on their state of health. In addition, in recent years, the Group has incorporated additional tests into the analyses in order to detect possible pathologies and illnesses that employees may suffer from in a preventive manner.

Renta 4 has in place the corresponding Risk Prevention Plan, producing an Annual Report of activities and Emergency Plan, and it carries out training courses for employees on risks and first-aid measures, among other activities. These courses are given by an external provider through the ORP contract and such training is given with the frequency recommended by the ORP regulations and according to the needs of each area or office in each financial year, which is why they are not included in the Continuous Training Plan indicated above.

In relation to occupational accidents and occupational diseases, the Mutual Insurance Company for

Occupational Accidents contracted by Renta 4 Banco, S.A. and Renta 4 Gestora SGIIC, S.A. for the financial year is still MAZ (0011), and for Renta 4 Corporate, S.A., Renta 4 Pensiones, S.A. and Renta 4 S.V., S.A. as MAZ (0011), Umivale Activa (0015).

The above mentioned insurance companies are responsible, for example, for the management of contingencies arising from occupational accidents and diseases, the provision of benefits derived from them, coverage and health care, management of occupational accident reports and preventive activities, as well as the management, control, and monitoring of economic benefits and temporary disability arising from common contingencies.

In 2022, despite the reduction in incidence, Renta 4 has continued to apply some of the measures of the COVID-19 Action Plan and Prevention and Protection Measures, which it developed and implemented in 2020 as a result of the global pandemic and health crisis caused by COVID-19. This Action Plan has been updated according to the situation of COVID-19 at any given time and following the recommendations made by the Spanish government and the health and labour authorities.

Among the measures that Renta 4 has continued to apply are the following:

- ✓ Thorough cleaning of offices and facilities, as well as sensitive and high contact areas (keyboards, mice, telephones, doorknobs, switches, etc.) all with specific and recommended products.
- ✓ Provision of hydroalcoholics and soap dispensers in all Renta 4's offices and facilities.
- ✓ Provision of approved face masks for employees and customers who request them.

## **6. HUMAN RIGHTS**

Renta 4 Group is committed (i) to complying with all the legislation applicable to its nature and activity, as well as (ii) to the observance of and respect for human rights. This commitment is the basis for all the relationships that the Group's entities establish with their stakeholders (employees, customers, suppliers, public administration and official bodies and society as a whole).

Below is a summary of the main indicators reflecting this fundamental principle and the most important milestones that have been achieved during 2022.

### **1. Code of Conduct**

There is a Code of Conduct, a top-level internal standard approved by the Board of Directors, consistent with international treaties, conventions and agreements (such as the United Nations Global Compact, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Declaration of Fundamental Principles and Rights at Work

of the International Labour Organization).

This standard establishes general guidelines for action, in addition to the mission and values of the Renta 4 Group. These include:

- Ethical behaviour.
- Equality and non-discrimination, with the consequent prohibition of all types of harassment, intimidation, offensive or improper behaviour (including sexual proposals or suggestions) and other actions that may affect a person's dignity.
- Work-life balance.
- Information security.
- Confidentiality.
- Respect for the right to privacy and personal data protection.
- Respect for intellectual property.
- Occupational risk prevention.
- Responsibility, which must also be reflected in accountability and the preservation of fair competition behaviours.
- Due diligence in the use of resources.
- Best practices in public tenders.

Likewise, the Code of Conduct describes the general guidelines to be taken into account in its relationships with stakeholders:

- Responsibility towards clients: Renta 4's relationship with its clients is based on transparency of information and acting in their best interests. These guidelines of conduct include investor protection, safeguarding assets and funds, financial responsibility and personal data protection.
- Responsibility towards employees: for Renta 4, the relationship with employees is fundamental to safeguard fundamental rights. Firstly, because corporate culture is reflected in its work and the way it interacts with stakeholders, that is, by protecting the rights of third parties. Secondly, because one of the Group's maxims is to promote a work environment that fosters personal development.
- Responsibility with suppliers: in the processes of approval, selection and contracting of suppliers for the acquisition of goods and services, Renta 4 will ensure competition, avoiding any type of interference that could compromise both the impartiality and transparency of the supplier selection process, in accordance with the Outsourcing Policy. It also ensures that third parties comply with principles and

values similar to those applied by Renta 4 in its activities, assessing non-financial risks in its approvals.

- Responsibility towards Public Administration and Official Bodies: Renta 4 Group is committed to collaborate and act with diligence in its relations with the competent authorities, to fiscal transparency and the prohibition of corruption and bribery. This matter is addressed in the 'Corruption and Bribery' section of this document.

Work is currently underway to extend the Code of Conduct to foreign subsidiaries so that they can adhere to it and align their internal regulations with its values and principles.

## **2. Investor protection**

Current securities market regulations require investment firms to provide their services honestly, fairly and professionally, in the best interests of their clients. Furthermore, banking regulation is committed to the defence of the banking customer in two directions: (i) through solvency requirements for credit institutions, aimed at market stability and (ii) by promoting transparency in institution-customer relations.

These premises, as reflected in the section on the Code of Conduct, form the basis of the daily work of all the people who make up Renta 4. Respecting and safeguarding standards of conduct not only achieves positive results with customers, but also creates value for society as a whole. One of Renta 4's values, set out in the Code of Conduct, is worth mentioning: *The Group aims to promote investment to improve people's lives. To this end, it is committed to moving towards a more sustainable and efficient world that contributes to the progress of society. In the financial system, the Group seeks to participate in innovation and the positive transformation of the economy. This vision is translated into a slogan that is communicated and disseminated internally to employees and externally to society: "PROMOTING INVESTMENT FOR THE PROGRESS OF PEOPLE AND SOCIETY".*

From a practical point of view, this maxim has materialised in this exercise in the following way:

- Through the analysis of regulatory obligations for investor protection and the internal development of projects to improve policies, procedures and processes.
- Through the incorporation of good practices in the sector.
- With the implementation of the supervisor's and auditors' recommendations and suggestions for improvement.
- Working on the revision of the Customer Service mail service, which is seen as fundamental in improving the quality of services.

In particular, work to implement regulation and best practices related to sustainable finance in the area of investor protection is particularly noteworthy. Thus, during the year 2022:



- The suitability assessment (a questionnaire prior to the provision of portfolio management and investment advisory services aimed at understanding investment objectives, time horizon and financial situation) has been adapted to include a block where the customer can indicate their sustainability preferences.
- The information provided to customers prior to contracting products and services has been reviewed to incorporate sustainability features where appropriate.
- Standardised information on the target market for sustainable products is being monitored in order to modify processes and provide appropriate information to customers when instrument providers start sending data to marketers.

It is also worth highlighting the work of various areas of Renta 4 Banco to incorporate the new requirements of the CNMV Guide on the assessment of suitability and good practices in the sector. The new processes have allowed for increased retail investor protection at various stages of the contracting process: (i) to determine whether or not a product is suitable according to the customer's knowledge and experience; (ii) to improve transparency of information to customers; and (iii) to adjust distribution procedures for certain products.

### **3. Personal data protection and information security**

The protection of personal data is a fundamental right recognised in Articles 18(4) of the Constitution, 8(1) of the Charter of Fundamental Rights of the European Union and 16(1) of the Treaty on the Functioning of the Union.

The work carried out by Renta 4 to protect the personal data of data subjects is based, in accordance with current legislation, on the principle of proactive responsibility. Five objectives were set for 2022: (i) to set Group standards that extend to non-Spanish subsidiaries; (ii) ensure training for all Group employees; (iii) supervise compliance with regulations at headquarters and in the commercial network; (iv) to incorporate the recommendations of external auditors; and (v) to focus on continuous improvement.

The following tasks have been carried out in this direction:

- ✓ Review and update of the privacy policies of the Group's entities, with the aim of increasing transparency in the information provided to customers and the control of data by data subjects.
- ✓ Voluntary external audit to determine the degree of compliance and areas for improvement. The compliance result determined by the external auditors was 81%, a 13% improvement compared to the result of the 2020 audit.
- ✓ To finalise the training plan, with specific sessions for the Board of Directors, senior management, non-Spanish subsidiaries and all employees who had not received training in the previous period.



- ✓ To improve customer information and internal procedures related to the protection of personal data by foreign subsidiaries.
- ✓ To work towards ensuring stable growth in the protection of personal data at different stages of the projects. Advice to the business areas, approval of new procedures during 2022 (e.g. on data subject rights management or employee training and awareness); monitoring of processing activities; conducting audits and raising issues of major concern to the Security and Privacy Committee are some of the examples.
- ✓ To ensure compliance with privacy regulations by third parties in each contract.

In addition to the development of new policies, procedures and processes, Renta 4 strives: (i) to enrich the information to data subjects; (ii) to reinforce the legal basis on which the processing operations are based and (iii) to comply in a timely manner with the management of the rights of access, rectification, opposition, erasure ("the right to be forgotten"), restriction of processing, portability and not to be subject to automated decisions. The applications received in 2022 have been handled satisfactorily.

In the area of information security it is worth noting that: (i) security processes for remote access and teleworking, management of operational and security events and acceptable use of assets have been strengthened; (ii) work is underway to align policies and standards with the principles set out in the European Digital Operational Resilience Regulation (DORA); and (iii) the physical security of the DPC and branches has been reinforced, ensuring the security of assets.

In addition, users and permissions associated with Core Banking solutions were recertified and various audits were carried out in relation to technological risk and information security.

The Security Office's objectives for 2022 focus on initiating certification to the ISO/IEC 27001 standard, training employees in Information Security, labelling all assets based on the Group's established classification, activating the data leakage prevention solution, testing the Technology Contingency Plan (TCP) and defining a Disaster Recovery Plan (DRP).

#### **4. Prevention of market abuse**

Regulation indicates that market abuse damages the integrity of financial markets and public confidence and impedes transparency, which is essential for trading.

The way in which the work this year has contributed to the fight against market abuse practices is summarised below:

- ✓ The Internal Rules of Conduct ("IRC") have been revised and updated. These internal rules, which are no longer mandatory, are maintained and enhanced to disseminate to employees the internal procedures for (i) avoiding and managing conflicts of interest; (ii) personal transactions; or (iii) reporting indications of market manipulation and insider trading. The updated IRC has been approved by the Board

of Directors of all the Spanish companies that make up Renta 4. The new version of the IRC is dated 22 March 2022.

- ✓ Various projects have been initiated to improve the systems and processes for detecting and reporting suspicious transactions to the supervisor.
- ✓ Corporate Governance: information on corporate governance issues is mainly reflected in two documents: (i) the Annual Report on Directors' Remuneration and (ii) the Annual Corporate Governance Report. Both documents are publicly available on the CNMV website (link: <https://www.cmv.es/Portal/Consultas/DatosEntidad.aspx?nif=A-82473018>).

## **5. Prevention of criminal risks**

The organisation and control model for the prevention of criminal risks is the internal system for preventing or significantly reducing the commission of crimes or behaviour contrary to Renta 4's principles within any of the Group's entities. It also provides for better management, regular analysis and continuous improvement. This model consists of: (i) a Criminal Risk Prevention Manual, which includes general controls, as well as details of the infringement being a potential risk for the Renta 4 Group and its specific controls; (ii) a Protocol for action in the event of infringement; (iii) a Whistleblower Channel Procedure; (iv) the Compliance Unit Regulations; and (v) the disciplinary system.

During 2022, no complaints were received through any of the channels provided by Renta 4: (i) internal channel for employees and (ii) external channel for other stakeholders (suppliers, customers, etc.).

## **6. Third party risk prevention**

The group has a series of risk prevention policies and, specifically, when outsourcing a service, it has drawn up the Outsourcing policy: this document defines the guidelines that must be taken into account in the decision-making, formalisation, management and control process when outsourcing to a third party the provision of the Renta 4 Group's own functions, both in normal and crisis situations.

The Group's entities, in any outsourcing process, go through the following phases: (I) Opportunity assessment; (II) Detailed analysis and approval; (III) Tendering and awarding; (IV) Implementation; (V) Monitoring; (VI) Reporting; and (VII) Exit or Renewal.

The factors that Renta 4 considers when carrying out due diligence on a potential service provider relate to: the nature of the provider and its capabilities, its ethical principles, the processing of personal data that it may carry out and the security and internal control measures that it has in place.

In accordance with the above, among other aspects, the company evaluates whether the supplier: (i) complies with Renta 4's values and Code of Conduct; (ii) acts ethically and with social responsibility; (iii) respects international standards on human rights, environmental protection and appropriate working conditions, including the prohibition of child labour; (iv) has a reputation and culture compatible with Renta 4's standards; (v) has a liability prevention model and (vi) has high ethical, behavioural and Social Responsibility principles in accordance with its profession, sector and jurisdiction.

## **7. Awareness raising and training**

During 2022, training and awareness-raising procedures on privacy and personal data protection have been approved so that all Renta 4 employees internalise key aspects on this matter and integrate them into their daily work. In particular, employees have been informed of the new procedure for early resolution of events and the corporate intranet has been enriched with security training content through policies, standards, procedures, newsletters and training videos.

Awareness-raising video shorts have also been maintained during the year 2022 on aspects related to: (i) protection of personal data; (ii) procedures included in the IRC; (iii) information security. On the latter subject, the most important ones are related to safe Internet browsing, asset management, good practices on the different types of existing attacks, proper management of corporate social networks, social engineering, fraud and the use of corporate devices.

In terms of targets for 2023 the following is highlighted:

- ✓ The adoption of an information security training and awareness plan by 2023.
- ✓ Personal data protection training for all employees.

## **8. Presence in the media**

Throughout 2022, Renta 4 has been present more than 14,200 times in the written press, web and print media, radio and television.

In this way, the Group is committed to fostering dialogue with its stakeholders and consolidating its position on the platforms as a stronghold of information and training. As in previous financial years, the Group's reputation has been measured in order to detect areas for improvement and increase confidence. In this regard, it is worth mentioning:

- ✓ The year 2022 has been a positive year in terms of reputation and media presence.

- ✓ This year, Renta 4 continues to make progress towards becoming a benchmark for economic and market information.

## **7. CORRUPTION AND BRIBERY**

Renta 4's Code of Conduct, the highest level of internal rules, establishes the following among its five general principles of conduct:

*'No employee of the Group shall offer, pay, request any payment, gift, promise or compensation with the purpose of obtaining favourable treatment in the commercial activity or in the decision-making process. Likewise, Group employees shall refrain from accepting gifts, hospitality or any type of compensation offered by other Group employees, clients, suppliers, counterparties, intermediaries or any third party with whom they have a relationship. For such purposes, payment, gift, promise or compensation shall be understood as anything given that exceeds the usual, social and courtesy practices, favours or services that imply privilege or unjustified advantage to natural persons or entities or that may condition the performance of functions. Renta 4 Group's employees shall not make donations on behalf of it or on its account, either directly or indirectly, to political parties or contribute in any way to their financing'.*

Being considered one of the five most important for Renta 4, this behavioural guideline is intended to reflect that the Group's mission and objectives shall only be considered achieved within a framework of transparency and zero tolerance for corrupt practices.

Likewise, the following are included as general principles of conduct for all employees: (i) faithful accounting of transactions and their adequate reflection in the financial information published by the Group and (ii) refraining from any action that compromises the Group's reputation, by carrying out unlawful practices when participating in public tenders.

Renta 4 has established the following guidelines for its dealings with the competent authorities and official bodies:

- ✓ For the exchange of information, the following premises, shall be taken into account, among others: (i) communications shall observe institutional respect and be developed under criteria of maximum collaboration and compliance with the Law; (ii) requests shall be processed with diligence; (iii) the delivery, promise or offer of any kind of payment, fee, gift or compensation to any authorities, public officials or employees or managers of companies or public bodies in Spain or any other country, whether made directly to them or indirectly through persons or companies related to them and whether it is addressed to the public

official or the employee themselves or to another person indicated by them, shall be forbidden.

- ✓ Regarding tax obligations: (i) practices that imply illegally avoiding the payment of taxes to the detriment of the Treasury shall be avoided and (ii) professional activities in countries or territories classified as tax havens in accordance with the Spanish legislation, if ever developed, shall be identified and defined.

In order to implement the above, the Group has the following measures, among others, at its disposal:

- ✓ The Internal Rules of Conduct (already described in the section on Human Rights). Revised and updated throughout 2022, this internal standard is intended to serve as a guide for managing conflicts of interest, as well as establishing guidelines for employee behaviour in the securities market.
- ✓ The organisation and control model for the prevention of criminal risks: following the analysis of the offences in the Criminal Code in which a legal person may potentially incur, in the area of corruption and bribery, Renta 4 contemplated a risk in both business corruption offences (articles 286 bis and ter) and influence peddling offences (articles 429 and 430). No unlawful behaviour has been contemplated in this regard. However, controls are in place to prevent the materialisation of the existing risk in certain daily activities of the Group's entities (such as the negotiation of agreements with clients or relations with the Administration). These include: (i) the IRC itself, mentioned above; (ii) audits; and (iii) the Board Regulations and procedures related to Corporate Governance.
- ✓ Outsourcing policy: although this internal regulation has already been described in the section on Human Rights, it is mentioned in this section in order to indicate that, in the process of approving third parties, aspects such as the following are taken into account: (i) whether the supplier has a criminal risk prevention model; (ii) whether it has a Corporate Responsibility Policy or (iii) whether its principles and values are in line with Renta 4's Code of Conduct.

Renta 4 is aware of the importance of this matter and of the role that financial institutions and other economic agents play in its prevention. Therefore, measures to combat money laundering and financing of terrorism are based on three fundamental pillars: the highest international standards, their adequacy and compliance through global policies, and the technological systems that enable such compliance.

Renta 4's commitment is materialised in the mandatory standards and procedures aimed at complying with the applicable regulations on anti-money laundering and with the recommendations issued by international organisations, the Financial Action Task Force (FATF) and national and international authorities. These manuals contain complete information on the internal control



measures adopted by the Group, as well as detailed policies on due diligence, information, document conservation, money laundering risk assessment and management, reporting and client admission.

These policies are updated and based on a prior risk analysis, a practical report adapted to the reality of the activity carried out by Renta 4, which constitutes an x-ray of the business from the perspective of anti-money laundering. This approach shall serve to identify the risks of someone taking advantage of the activity carried out by Renta 4 to introduce, move or hide funds of suspicious origin.

No one knows the risks of each business better than those who carry it out. That is why, the bank's entities shall be classified by risk level, and measures and controls shall be designed and implemented to mitigate the risk. In addition, a specific risk analysis is performed and documented prior to the launch of a new product, the provision of a new service or a new distribution channel or the use of a new technology, and appropriate risk management measures shall be implemented thereafter. Likewise, a risk analysis is performed on the client's characteristics. Clients shall be classified into different risk levels in order to design and implement measures and controls to mitigate the risk.

On the other hand, the policies and manuals implemented by the Group are reviewed through internal and external audits in order to verify the correct functioning of the system for anti-money laundering and countering financing of terrorism. To this end, Renta 4 has a policy on Anti-Money Laundering and Countering Financing of Terrorism, which is reviewed and updated periodically to adapt it to the organisational, legal and functional changes that may occur in the Group. These modifications are approved by the Committee for Anti-Money Laundering and Countering Financing of Terrorism and the Board of Directors.

In accordance with the provisions of the Manual, the organisational structure that Renta 4 has established for Anti-Money Laundering/Combating the Financing of Terrorism is as follows:

- ✓ An Internal Control Body (ICB) for Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT), centralised at Group level, that establishes policies on anti-money laundering and countering financing of terrorism, in accordance with Law 10/2010 and its derived regulations, and ensures compliance therewith. In addition, the different business units of the Group are represented in the ICB.
- ✓ An Anti-Money Laundering Technical Unit, centralised at Group level, with specialised staff, exclusive dedication and appropriate training in analysis. The main objective of this unit is to define and supervise the processes within the business, as well as to ensure compliance with the policy for the prevention of money laundering and the financing of terrorism.

- ✓ A representative before the SEPBLAC in charge of administration and appointed in turn by the Board of Directors, who is ultimately responsible for compliance with the reporting obligations established in Law 10/2010, of 28 April.

This organisational structure makes it possible to adequately manage the risk of non-compliance with regulations, which entails a significant reputational risk, with a potential negative impact on relations with clients, markets, employees and the authorities. In particular, non-compliance with regulations may result in penalties, damages or cancellation of contracts, with the consequent damage to the image projected by the Group.

Furthermore, in the last quarter of the year the Group is adapting to comply with the EBA/GL/2022/05 guidelines on the role and responsibilities of the AML/CFT compliance officer under Article 8 and Chapter VI of Directive (EU) 2015/849. These guidelines aim to clarify and determine the roles and responsibilities of the Entities' management bodies, their representatives and compliance officers on the prevention of money laundering and terrorist financing.

In financial year 2022, Renta 4 has implemented policies to effectively comply with Article 31 of Law 10/2010 of 28 April, regarding internal control measures at group level. To this end, it has increased its control over foreign subsidiaries, reinforcing its reporting obligations to the parent company in order to obtain relevant information more regularly and in greater detail, especially in the areas of detection of suspicious transactions, registration of high-risk customers, matches against lists of persons with public responsibility and blacklists. In addition, this information exchange procedure has been documented through policies and procedures that ensure that its branches and subsidiaries abroad, in which it has a majority shareholding, have established and applied AML/CFT procedures and measures aligned with those established by the parent company

In addition, during 2022, due to the war in Ukraine and the restrictive measures imposed by the EU against Russia, in particular individual sanctions, economic sanctions and diplomatic measures, the Group has reinforced its control policy by strengthening the financial sanctions protocols implemented by the Group in order to prohibit the making available of funds or economic resources, directly or indirectly, to or for the benefit of natural or legal persons, entities or bodies included on the list. In addition, there is the application of trade restrictions affecting certain products, companies, economic sectors or geographical areas. On the other hand, transactions are prohibited with certain state entities (Russia, its government and its Central Bank) and with those legal entities subject to public control or with more than 50% public ownership. Means are put in place to limit access to financial and capital markets and services for certain Russian banks and companies, transactions with the Central Bank of Russia or Belarus are prohibited, and payments to various Russian and Belarusian banks are excluded.

In addition, it has adopted the necessary measures to ensure that employees are aware of the internal policies, procedures and controls established in the Anti-Money Laundering & Countering Financing of Terrorism Manual.



Consequently, the Group's employees must know and put into practice the prevention measures contemplated by internal regulations and examine those transactions which, due to their nature or the circumstances and characteristics of the clients, present indications of possible links with money laundering or terrorist financing activities, in order to adopt the additional prevention and communication measures defined from time to time. To this end, the Manual is always accessible and updated on the intranet.

With this objective, training has also been strengthened, in which knowledge of financial sanctions has been reinforced, with a view to understanding the obligations to which the Group is subject. This training was mainly aimed at employees located in subsidiaries outside Spain, management bodies, sales network employees and internal control. These training measures have been completed by 94% of the employees called.

The main indicators of this activity in 2022 are detailed below:

<b>Formación</b>	<b>% de personas formadas</b>
<b>Consejo de administración</b>	100%
<b>Empleados España</b>	95%
<b>Empleados filiales</b>	90%

Senior management is also responsible for the AML/CFT policies and measures in place to manage ML/FT risk. This implies that it should be aware of the ML/FT risks to which it is exposed and take the necessary measures to effectively mitigate those risks. To this end, in 2022 the board of directors of the group companies, which are also considered reporting parties according to the regulations on the prevention of money laundering, CII and Pension Plan management companies, were fully trained.

### **Contributions to industry associations**

Renta 4 establishes alliances with associations from different sectors in the communities where it operates, relying on them to identify and try to respond to the needs of the local environment. The Renta 4 Group's total contribution to non-profit sector associations in 2022 amounted to 182,236.40€

Renta 4 Gestora SGIIC SA and Renta 4 Pensiones SGFP SA are ordinary members of INVERCO, the Association of Collective Investment Institutions and Pension Funds, the Spanish umbrella organisation for collective investment schemes. Its members are Spanish entities that manage investment funds and pension plans, as well as foreign entities that are duly registered and controlled

by the Spanish Securities Market Commission (CNMV). The instalments paid in 2022 were 14,150 euros and 25,000 euros respectively.

## 8. SOCIETY

The correct development of Renta 4's activities through its processes depends, to a large extent, on the suppliers involved. The correct management of these directly affects operations, projects and, ultimately, both the non-financial and financial impact on society. A significant percentage of Renta 4's activities are carried out by outsourcing services to suppliers, as reflected in the percentage of expenditure and investment they represent.

The main risks affecting the organisation in terms of engagement with sub-contractors and suppliers are organised in two main blocks: IT risks (related to Information Technology) and non-IT risks.

Firstly, with regard to IT risks, the following three main areas with possible risk implications are distinguished and listed together with the potential impact that could result from them:

- Privacy: inadequate management of personal data whose data controller is Renta 4 by its suppliers could lead to claims and even significant sanctions from the AEPD, mainly derived from the possibility of non-compliance with current data protection regulations, especially the General Data Protection Regulation (GDPR), in addition to the potential reputational impact derived from this.
- Continuity: risks arising from inadequate management of processes related to the Group's operational resilience and effective incident management, the impact of which may be accentuated if there is no adequate framework for action agreed with suppliers/sub-contractors.
- IT security: risks of security incidents or breaches arising from the implementation of an incorrect selection of security measures associated with the provision of the different services.

On the other hand, the main non-IT risks to which the organisation could be exposed are set out below:

- Quality and compliance risks: are those that arise in relation to the possibility that the supplier does not comply with the quality levels required by Renta 4, as well as the different SLAs established.
- Reputational risks: arising from the possibility of the supplier being involved in bad practices or illegal activities, as well as regulatory breaches which, due to being in the public domain, affect Renta 4's brand image.
- Financial risks: these are the risks that arise in the event that the relationship with the supplier generates a financial impact on the group that is not aligned with the service or product

contracted, either due to incorrect compliance resulting from insolvency or due to the supplier's liquidity problems.

- **Operational risks:** resulting from the inadequacy or failure of internal processes, personnel and systems, or from external events. In particular, errors by information and pricing providers, or intrusions into technological systems that could jeopardise the security of the Group's infrastructure.
- **Sustainability or ESG risks:** include, as a non-financial risk, the losses associated with poor performance, or the lack of sufficient measures to achieve better environmental protection, social development with cohesion criteria and economic growth that generates equitable wealth under appropriate internal governance of the company.

Renta 4 believes that both sustainability risk and reputational risk would be mitigated by establishing policies and procedures with a view to Corporate Social Responsibility, with a vocation for permanence and a commitment to the highest level of business management, as well as shared value with the citizens in its sphere of action. The objective pursued with the appropriate management of these risks is to generate profit in a responsible manner, considering sustainable investment as one of the main levers for the progress of the entities and of society.

In order to achieve this purpose, an internal committee or ESG Committee was set up last year, which is responsible for supervising the reporting process and internal control systems in ESG matters, and for submitting the information in this respect to the Board of Directors for approval.

The Renta 4 Group also works to raise awareness and implement incremental measures in this area, by issuing a series of annual policies and reports to inform its stakeholders about the measures to manage and reduce these non-financial risks. These include the Group's ESG policy, which establishes sustainability as a priority, integrating ESG aspects into its business strategy and corporate culture. Moreover, Renta 4 Gestora has adhered to the United Nations Principles for Responsible Investment, publishing ESG policies and the adverse impact report, the ESG asset management policy, which shall be regularly updated in accordance with regulatory developments. Finally, the Group issues an information statement on non-financial risks, which is included in the annual report and which sets out the measures adopted and their annual improvement in accordance with the development of best practices and regulations.

In addition, the group is implementing the Sustainability Disclosure Regulation for the financial services sector and other approved regulations, and has initiated in past years, with the help of external experts, policies, procedures and measures to analyse the current situation of the group with respect to the regulatory requirements to report on the integration of ESG risks.

It should be noted that in 2022 Renta 4 Banco has included the ESG Risk framework in its Risk Appetite Framework. In addition, the group has several policies for managing these risks and, specifically, Renta 4 Gestora SGIIC, in addition to the ESG policy, has a statement of the main adverse events. Internally, policies and procedures have continued to be developed to identify, regulate and mitigate these ESG risks, although they are not a priori material. Finally, it should be noted that Renta 4

Gestora has signed up to the UNPRI (Principles for Responsible Investment) programme as of 31 January 2020. Likewise, a methodology is being developed to calculate the Renta 4 Group's Carbon Footprint in accordance with the GHG Protocol and target levels will be established.

We are currently in the process of integrating ESG and sustainable risk criteria for services offered to the public, such as portfolio management and advisory services, in which they are asked about their preferences for sustainable investment. In this way, the client will be able to promote a sustainable investment according to his preferences, which will evolve progressively to the completion of the sector data. The integration of preferences with investments is expected to take place over the next financial year as information is received from investment fund issuers across the financial sector.

Additionally, the Group adapts to the ESG Taxonomy Regulation in accordance with regulatory requirements and deadlines by establishing the 'ESG Taxonomy Exposure Eligibility Assessment Procedure' in which both internal and external tools (Clarity AI) are used to report compliance with the eligibility of exposures under the taxonomy in the Statement of Non-Financial Information.

From a social point of view, in terms of achieving greater social cohesion, Renta 4 has an Equality Plan, which seeks to achieve equal treatment and opportunities between women and men, promoting and guaranteeing equal opportunities for income and professional development at all company levels, adapting policies to social changes, as well as ensuring equity in the compensation policy.

It also has a 'Protocol for the prevention, handling and elimination of sexual harassment on the grounds of gender and discrimination'.

Finally, Renta 4 wants to go further in its commitment to environmental protection and, to this end, a model has been developed for 2022 to calculate the carbon footprint of scopes 1 and 2 and of the activities relevant to Renta 4 in scope 3. The calculation is based on 2021 emissions data for the entities, Renta 4 Banco and Renta 4 Gestora and their controlled operations. While we understand that in 2022 they may vary somewhat, the order of magnitude will be similar so that the conclusions are applicable to the 2023 strategy.

With the results obtained in terms of carbon emissions, a final report has been produced with the conclusions and key points, at a high level, and possible actions to be carried out to favour the reduction of the footprint. This detailed report on the calculation of the carbon footprint can be found in the sustainability report.

The result of the carbon footprint calculation for 2021 was equivalent to 827.7 t CO<sub>2</sub>. Corresponding to the sum of operational Scope 1, 2 and Scope 3 emissions. Scope 3 for financed emissions has not been included as the market does not yet have sufficiently verified and accessible information.

The methodology implemented in the calculation of Renta 4's carbon footprint is based on:

- GHG Protocol according to the ECCR standard (Corporate Accounting and Reporting Standard)

- The indications of the MITECO (Ministry for Ecological Transition and the Demographic Challenge)
- The Partnership for Carbon Accounting Financials (PCAF) guidance: The Global GHG Accounting and Reporting Standard for the Financial Industry.

In addition, during the first quarter of 2023, the calculation model developed to calculate Renta 4's carbon emissions will be used to obtain those corresponding to 2022, which will be published on the company's website in due course.

Based on these data, a decarbonisation plan is being prepared which will be presented to the ESG Committee and, if approved, will be submitted to the Board for approval.

### **Information on partnership or sponsorship activities**

In the solidarity field, the Group's activities are mainly channelled through the actions carried out by Fundación Renta 4 (Renta 4 Foundation). As of today, Renta 4 Banco accounts for 100% of the contributions received by Fundación Renta 4 to carry out its activities.

Fundación Renta 4 contributes annually to projects that promote education in the most vulnerable populations of Spain, Africa, and Latin America in order to ensure that high quality education reaches the greatest number of young people following transparency values.

Fundación Renta 4 involves the Group's employees in the project proposals and associations that can participate in the selection process. The foundation's board of trustees analyses every proposed project/association and checks whether they meet the established requirements. Then, some projects and associations are validated and all employees vote to choose the ones with the most votes.

Currently, the foundation makes annual contributions of €6,000 euros to 11 projects. These assignments are revalidated on an annual basis, although five of them already have a continuity commitment, given the trajectory shared with the projects developed in them.

In addition, Renta 4 participates directly in specific actions, ensuring that they are always within the area of solidarity action that the Group has set itself: education and culture, as vehicles for social inclusion and the development of disadvantaged groups. These actions include examples such as the patronage of the Teatro Real (€65,377.00); among others.

Specifically, in the 2022 financial year Renta 4 donated the following amounts:

Asociación Caridad	200,00
Fundación Avanza ONG	6.500,00
Fundación AMPAQ	600,00
Universidad de Valladolid	6.423,54
Fundación ECODES	60,00
Fundació privada oncolliga Girona	100,00
Fundación Amigos del Teatro Real	5.200,00
Insigne Cofradia Penitencial del Nuestro Padre Jesús Nazareno	325,00
Fundación Renta 4 Banco	106.000,00
Fundación del Teatro Real	65.377,00
	<b>190.785,54</b>

### Company's commitment to sustainable development

Due to Renta 4's activity as a bank specialised in capital markets, an activity of a global nature and with a wide technological scope, the impact on suppliers and employment is usually broad.

In addition to the effects described above, the activity of Renta 4 consists in democratising intermediation and asset management, which has a positive effect on the financial situation, providing a value-added service with impact on the citizens' finances and savings. The dissemination and pedagogical work is a commitment that is embraced across the entire organisation, both in the branches and at headquarters.

In 2022, 122 training and information courses on the different investment products were organised (20% more than in 2021); 3,586 people registered for the different courses (8% less than in 2021) and, in webinar format, the 37 training sessions that were scheduled (54% more) attracted 16,691 live attendees and 28,755 deferred attendees (growth of 114% and -1% compared to 2021).

<b>CURSOS OFICINAS</b>	<b>2021</b>	<b>2022</b>	<b>Diferencia</b>
Total de cursos realizados	102	122	20%
Total apuntados	3.902	3.586	-8%
Media de apuntado por curso	38,3	29,4	-23%

<b>Webinars</b>	<b>2021</b>	<b>2022</b>	<b>Diferencia</b>
Total de webinars realizados	24	37	54%
Total visualizaciones en directo	7.814	16.691	114%
Total visualizaciones on demand	29153	28755	-1%

One of the most attended training conferences was the 'Cycle from Saver to Investor', which offers seven conferences on the fundamentals of investment, funds, the stock exchange, pension plans,



sustainable investment, megatrends and crypto-assets. In this section, multiple pieces of content are produced and disseminated throughout the year around the theme of sustainability in the form of blog posts, video shorts, conferences, webinars and courses...

In line with the commitment to nationally and internationally recognised principles, Renta 4 Gestora has adhered to the United Nations Sustainable Investment Programme, the Principles for Responsible Investment, whereby it undertakes to incorporate environmental, social and corporate governance factors (ESG) in investment decision-making.

Under this agreement, Renta 4 Gestora is explicitly integrating ESG factors into all its investment decisions in order to better manage risks and enhance the returns of the funds it manages.

Renta 4 continues with the gradual incorporation of environmental, social and corporate governance factors in both the company's activity and in investment decision-making, fully convinced that these are already necessary actions to comply consistently with the company's purpose towards its clients and society.

In December 2022, Renta 4 Banco has applied to join the UNPRI programme, as has Renta 4 Gestora. In addition, it has applied for NZBA membership, thus joining organisations that confirm their commitment to reducing carbon emissions to zero. To this end, a decarbonisation plan has been established and is pending submission to and approval by the ESG committee for implementation in 2023.

Along these lines, the teleworking model, initiated in 2019 with COVID, has been consolidated in a hybrid model since 2021, combining face-to-face and telematic work to favour integration in the company and the business culture, while at the same time improving family reconciliation and, with the reduction of journeys to work centres, a reduction in CO<sub>2</sub> emissions from vehicles, and in the consumption of electricity, gas, water, paper, etc. at the work centres.

## **Description of the relationships maintained with local communities**

Renta 4's activities and events are advertised through the web, social networks, and local media (radio, newspapers, etc). Special emphasis is placed on offering specialised information in collaborative formats through local newspapers and radio stations.

The establishment of Renta 4 in the country through its wide network of offices of 62 offices in all provincial capitals generates an economic impact on employment and the outsourcing of suppliers for maintenance and several other service activities to sustain the branches that function locally.

Renta 4 is a national benchmark in investment services and capital markets. Its presence throughout Spain, in every provincial capital, is proof of its commitment to society as a whole to democratise



investment, based on the belief that investment is one of the main engines for improving people's lives.

In addition, Renta 4 Banco has developed and put into production in 2022, tools that allow investors to carry out their investment activity considering sustainability factors. The purpose is to enter data and elements to filter and select the assets and agents that fit their SRI criteria.

The Corporate activity of Renta 4 includes the analysis and access to financing for small companies to support their growth and eventual IPO. This activity is combined with local offices to offer SMEs these possibilities, so we consider that it has a very positive impact on local areas.

The Group, with the collaboration of some of its employees, participates in the initiative for financial education for young people "Tus Finanzas, Tu futuro" (Your Finances, Your Future). We have been actively involved in this initiative since its inception. In 2022, as in 2021, it maintained in a more digitised version.

In addition, a large number of training activities on financial matters are carried out in order to bring these aspects of financial literacy closer to local citizens, as described above.

## **Outsourcing and suppliers**

Renta 4 is firmly committed to carrying out supplier selection, outsourcing and sub-contracting activities following the principles of contribution to society and its sustainability. To this end, the supplier selection process takes into account the terms of financial due diligence, a number of internal policies and adaptability to future service needs.

To this end, a policy and procedure for outsourcing services and functions has been drawn up, which contemplates the set of analysis, monitoring and review activities to be carried out in order to ensure that the third parties contracted comply with the minimum conditions and requirements demanded to achieve adequate mitigation of the inherent risks associated with the function or activity to be performed by the third party.

In addition to the policy, it has developed a methodology on how to proceed with third parties in each of the phases of their life cycle (contracting, provision and end of service). Complementing the methodology, a tool has been defined for the evaluation of outsourcing, which allows an assessment



to be made of the inherent risks associated with the services to be outsourced and to evaluate the suitability of the supplier from the point of view of risk minimisation, taking into account environmental, social and human rights protection criteria.

The three pillars of this policy are the following ones:

a. Commitment to prepare Request For Proposal (RFP)

The selection of suppliers is carried out using established procedures to mitigate the aforementioned risks and to have measures in place to control them, these procedures being dynamic, thus allowing them to be adapted to possible changes that may occur over time.

The procedures are grouped in the RFP (Request For Proposal) document, in which the requirements associated with the product or services are included, in order to have an objective reference as to the suitability of the suppliers assessed.

b. Transversal impact analysis

The selection of suppliers is always based on a transversal analysis of the various Renta 4 areas, represented in three functional verticals:

- Technology (security area)
- Business (Marketing, Digital Development, others)
- Compliance (Compliance, Risks, Continuity, Privacy, others)

These analyses are carried out by people responsible for each project or area, depending on how the activity is performed at any given time and through the corresponding meetings and reports, and they are supervised individually by the Management.

c. Internal committees:

1. Security Committee

This is the body that evaluates recently developed projects or the continuity of activities from an information security point of view in relation to how they are executed and what suppliers are engaged in it. It is one of the elements that guarantee compliance with the above-mentioned principles and the application of defined procedures.

2. Suppliers Committee

This is the body in charge of managing suppliers' IT risks, handling their approval and review, in coordination with the areas involved depending on the supplier or service.

### 3. ESG Committee

This is the body that approves the procedures related to ESG or similar matters, and that shall adopt decisions in relation to possible non-compliance by third parties.

### 4. Training:

During the last financial year, a series of activities associated with the process of training and raising awareness about matters related to technological risks have been carried out, apart from those provided by the Security office or the risk management office:

- ✓ Workshops on applicable regulations in the fields of Information Technology and Cybersecurity.
- ✓ Training courses specific for the Board of Directors on technological risk management and third-party risks.
- ✓ Drawing up information video shorts on security matters.
- ✓ Drawing up information video shorts on third-party risks.

## **Description of supplier monitoring and audit systems**

Although Renta 4 does not have specific supervision systems or audits in environmental matters due to the low level of materialisation of this impact on the Group's financial activity, suppliers are periodically supervised and audited both by the various areas on a discretionary basis, and in accordance with Renta 4's transversal supervision systems. Given the growing importance of monitoring the security of suppliers, an outsourcing policy has been formalized that includes a review and approval of suppliers prior to contracting, taking into account issues such as certifications, security, continuity, data protection, cloud resources, human resources, human rights, equality, among others. In this regard, the approval of suppliers is reviewed periodically, preferably annually, taking into account human rights and sustainability criteria, and being able to certify or audit compliance with them.

Moreover, a series of audits of the third-party risk management process have been carried out in accordance with the previously defined audit plan. As a result of these audit efforts, several points for improvement have been identified and action plans have been defined to remedy them.

With regard to the protection of client assets, Renta 4's own processes and those of third-party suppliers are audited by external auditors on an annual basis, in order to demonstrate the correct safeguarding and protection of client funds and assets. Furthermore, in accordance with regulations, Renta 4 has a person responsible for the asset protection function, who is responsible for monitoring

the activity of third parties.

The main supplier supervision systems identified are the project or activity committees, which involve several areas and are ultimately overseen by the General Management, and other formally established committees, including the Security Committee, the Supplier Committee and the ESG Committee.

## **Cybersecurity**

Renta 4 Group is committed to the fight against cybercrime by ensuring proper information security management and continuous improvement of cybersecurity.

Cybersecurity has become one of the most relevant concerns of the Renta 4 Group due to the fact that, currently, there is constant interconnection through telecommunications, which results in more vulnerabilities within the information systems of the Group.

Renta 4 is constantly working to raise awareness and train each and every one of its employees and customers. To this end, an annual training and awareness-raising plan has been created and is reviewed every year, geared to the level of maturity identified in the Group. In addition to the development of alternative campaigns based on the current situation, aimed at raising awareness among all our employees. In the case of our clients, Renta 4 has created educational and awareness-raising content published on the website so that all our clients can be informed of the best practices they can carry out in their accounts to avoid being victims of possible fraud and/or scams. Also, this year Renta 4 has enhanced the quality of notifications to its clients in order to keep them informed of the most relevant possible attacks in the financial sector.

On an annual basis, Renta 4 reviews the Information Security and Personal Data Protection Policy, which is sent to all employees, along with security and privacy guidelines adjusted to the work position. In addition, all the standards and procedures that make up the Group's document system are reviewed and updated.

The most important points to highlight carried out by Renta 4 over the last year, are as follows:

- Conducting quarterly meetings of the Information Security Committee.
- Collaborating in a coordinated manner with the privacy, risk and continuity departments to ensure adequate information security.
- Maintaining the Group's entire document system up to date, tailoring all its content to market security standards.
- Assessing, improving and maintaining the security of the data processing centre facilities.
- Drawing up Renta 4's asset inventory with the participation of all areas of Renta 4.
- Classify Renta 4's assets using the five dimensions (authenticity, confidentiality, integrity, availability and auditability) and MAGERIT.
- Making improvements to the remote-work process.

- Preparing the annual training and awareness plan based on information security for the Renta 4 Group.
- Improving standards and procedures for event management and reporting.

Within all these points of improvement that have been relevant in the last year, Renta 4 works daily to maintain the security of its systems, with security systems such as: protection mechanisms against Denial of Service attacks, with different levels of Firewall that protect the Group's network, anti-malware systems, etc. In addition to the above, Renta 4 has the necessary information to prevent, protect and respond to security and operational events.

Also, Renta 4 is working on automating the information labelling system to provide a higher level of information security, aimed at preventing with better data leakage results.

For these reasons, each year Renta 4 sets a series of objectives that are aligned with the needs of the Group and the moment. The next defined goals are:

- To continue to train and raise awareness of Information Security amongst all employees.
- To implement asset tagging throughout the Group using an automated tool.
- Initiate accreditation to the best practice of the ISO 27001:2013 standard.
- To implement all standards and procedures developed in the area of Information Security.
- To perform a maturity analysis of the Information Security documentation system.
- To be in constant coordination with all the countries involved in the Group in order to achieve the correct level of Information Security.

Renta 4 is committed to work with cybersecurity in order to achieve optimum and adequate levels of protection in its systems. To this end, it strives to constantly advance and improve its level of security.

## **Consumers**

The Renta 4 Group is a company specialised in the provision of investment services and high-quality asset management, whose principles are based on proximity to clients and specialisation, offering a wide range of products and high-quality advice for client satisfaction, one of the main purposes of Renta 4.

In accordance with Order ECO/734/2004, dated March 11, on the client departments and services of financial institutions, the Customer Service Department of Renta 4, (hereinafter, CSD) has the main function of processing and resolving the complaints and claims submitted by clients. To this end, Renta 4 has set up different channels for the effective submission of complaints and/or claims:

- E-mail [defensor@renta4.es](mailto:defensor@renta4.es)
- Renta 4 website <https://www.r4.com/> through the customer's logged-in account (with digital certificate)
- Postal address: Paseo de la Habana nº 74, 28036, Madrid

- In person at any of Renta 4's offices
- Clients or users can also make complaints to the Consumer Affairs offices of their Town Council or Autonomous Community.

Complaints received through any of the channels mentioned are sent to the CSD to first determine whether or not they are to be processed. Then, once they have been accepted, we proceed to the study and detailed analysis of each of the issues raised, reviewing the procedures established by Renta 4 and finally issuing the corresponding resolution, or urging the parties to reach an agreement on the disputes raised.

The evolution in the number of claims submitted to and processed by the CSD is shown below, classified by the type of resolution issued.

**TABLE 1 Evolution of Complaints submitted to the CSD - Classification by type Resolution**

Clasificación por Tipo de Resolución	2022		2021		2020		2019		2018		2017		2016		2015		2014		2013	
Desfavorable para el Cliente	19	49%	23	61%	15	34%	16	64%	24	69%	21	70%	24	89%	18	51%	12	55%	24	73%
Favorable para el Cliente	3	8%	4	11%	5	11%	1	4%	1	3%	-	-	-	-	-	-	2	9%	-	-
Propuesta de Avenimiento del SAC (Acuerdo)	13	34%	6	16%	15	34%	8	32%	9	26%	8	27%	3	11%	14	40%	6	27%	7	21%
Desistimiento del Cliente	1	3%	3	8%	1	2%	-	-	-	-	-	-	-	-	1	3%	-	-	2	6%
No Admitido a trámite / Suspensión	1	2%	-	-	1	2%	-	-	1	3%	1	3%	-	-	2	6%	2	9%	-	-
Pendientes de Resolución a 31.12.2022	2	5%	2	5%	7	16%	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>TOTAL</b>	<b>39</b>		<b>38</b>		<b>44</b>		<b>25</b>		<b>35</b>		<b>30</b>		<b>27</b>		<b>35</b>		<b>22</b>		<b>33</b>	

## Tax information

With regard to tax information, in accordance with the provisions of Law 11/2018, section one, two V, Renta 4 Banco SA operates in Spain, Chile, Peru, Colombia and Luxembourg. Renta 4 Banco pays direct input taxes (own taxes) and collects others from third parties generated by economic activity and based on its role as a company collaborating with the tax authorities (third party taxes).

In relation to these countries, the profits obtained in each of them and the taxes on profits paid are specified in the following figures (in thousands of euros):

	Total	Luxemburgo	Colombia	Chile	Perú	España
Resultado antes de Impuestos	29.382	-216	786	2.309	280	26.223
Impuesto sobre beneficios*	-7.600	18	0	-426	-39	-7.153
Resultado despues de Impuestos	21.782	-198	786	1.883	241	19.070
Cuota a pagar del ejercicio 2022	7.116	0	0	427	32	6.657

\* u otros análogos

The Bank and the rest of the Group companies are subject to other taxes, besides income tax, the most important one is the tax on deposits in credit entities, which amounts to €583,000. During 2022, Renta 4 Banco S.A. did not receive any tax subsidies or public aid in this regard.



## **9. ESG COMMITMENT**

Renta 4 considers sustainability to be one of the main values to be applied in its business strategy and has therefore established a series of governing bodies, policies and plans, which are set out below.

In this regard, at the end of 2021, the Mas Plan was approved, which aims to project Renta 4's strategy for the coming years, based on three fundamental axes:

1. Provision of new basic banking services.
2. Launch of advanced digital investment solutions.
3. Development of thematic and ESG investments.

In terms of sustainability, the third axis pays special attention to sustainable investment, emphasising the ESG approach, as part of Renta 4's broad vision and commitment to sustainability.

In order to develop the strategy and adaptation of Renta 4's governance, as well as to adapt to the requirements in this area, the ESG Committee has been set up to ensure the development and implementation of a sustainable investment policy in compliance with the regulations in force and in line with the trends in society.

This committee is made up of relevant members, including the Chairman of the Board of Directors of Renta 4 Banco, the Chairman of Renta 4 Gestora, as well as other directors and executives of the bank. As a result, the aim is to achieve alignment between Renta 4's strategy and the implementation of ESG practices and procedures. The committee meets 3-4 times a year to review the progress of the different initiatives.

In relation to policies, Renta 4 Banco has an ESG Policy, the aim of which is to provide a global framework in which the general principles and procedures for the incorporation of ESG criteria are set out in a harmonised and homogeneous manner:

- Strategy and business: Renta 4 is committed to promoting investments that minimise negative impacts, and to promoting the integration of ESG criteria in the development of its activity at corporate level.
- Products and services to be marketed: development of a catalogue of sustainable products and services to complement its current offer and to respond to current market demands within the ESG field.
- Risk management: integration of ESG risks in Renta 4's strategic or investment decision-making.
- Transparency: towards both our clients and stakeholders, communicating Renta 4's positioning and performance in the ESG area.
- Governance: Integration of ESG criteria into Renta 4's strategy, decision-making, roles and responsibilities.

In addition, Renta 4 Banco has an ESG Asset Management Policy and Renta 4 Gestora has formulated

a specific ESG Policy.

In developing these policies, Renta 4 is implementing procedures for assessing the impact of climate and environmental risks in relation to the environment, strategic planning and criteria for selecting products to invest in and/or manage. In addition to financial criteria, Socially Responsible Investment (ESG) criteria are applied, which follow investment strategies based on exclusionary and valuation criteria. The majority of our portfolios pursue a sustainable investment policy. In the analysis and selection of securities, ESG characteristics are integrated into most of the potential assets for potential investment, through the various sources of information.

On 20 December 2022, ESG risk was included in the Risk Appetite Framework as a non-material risk and its ESG risk appetite was established as follows:

- Commitment to reduce Renta 4's carbon footprint generated directly and indirectly as a result of its activities. For this purpose, a model has been developed for the calculation of the operational carbon footprint considering scope 1, 2 and 3. Based on this calculation, a decarbonisation strategy is being defined and a SDG is being established for approval by the Board of Directors.
- Supporting the green transition by integrating ESG criteria into its investment decision-making processes, both on its own account and in the provision of services to third parties (portfolio management, financial advice and marketing of CII). These criteria are set out in Renta 4 Gestora's ESG Asset Management Procedures and ESG Procedures.
- To limit or deny financing to customers who may pose a material risk to the Group of not meeting its commitments with respect to ESG criteria.
- Adaptation and improvement of processes to meet ESG regulatory requirements (SFDR, MiFID, solvency and other banking regulations).

During the year 2022, work has been carried out on the following aspects:

- Renta 4 Gestora Sustainability Annexes

The new regulation provides that fund managers of funds that either promote sustainability or target sustainable investments must prepare and file with the CNMV an annex to the prospectus ("sustainability annex") in accordance with the standardised templates in the European Regulation. The content of these annexes substantially expands the information that the funds included in their prospectuses.

In order to comply with this requirement, Renta 4 Gestora and different areas of Renta 4 Banco have worked to comply in due time and form with the preparation, presentation to the supervisor and

publication on the website, together with their respective products.

- Suitability test for the provision of advisory and portfolio management services:

The new rules establish the obligation to ask customers about their sustainability preferences and to provide advisory or portfolio management services based on their answers.

The regulations require a high level of detail in the formulation of the questions, but there is currently no standardised information that would allow the customer to be offered investment products with the specific characteristics derived from the customer's answers.

Accordingly: (i) the required changes in customer information (suitability test, advisory proposals, specific conditions of the portfolio management service) have been implemented; (ii) processes have been established to meet the regulatory requirements which, with the information available, can be complied with; and (iii) monitoring is being carried out to prepare for implementation when regulatory information on the sustainability of products is received.

- Adequacy of processes and information according to EU taxonomy.

The consistency and traceability of the databases has been improved, and the systems have been adapted to the taxonomy changes effective from 2022, by means of the SFDR implementing regulations. Renta 4 has also increased the automation of the required processes.

- Carbon footprint calculation.

A methodology has been established for the calculation of the carbon footprint in accordance with the GHG Protocol, for the calculation of scopes 1, 2 and 3 in accordance with the definition established therein. The carbon footprint for 2021 has been calculated and, as MITECO data is updated, the footprint for 2022 will be recalculated. This detailed calculation of the carbon footprint will be carried out and reported in advance on an annual basis in order to establish decarbonisation as an SDG.

- Training and Awareness Raising.

A series of training and awareness-raising sessions have been promoted for the board of directors as well as for the staff of the organisation.

## **Controls and reports**

Policies and procedures are aligned with regulatory developments and supervisory expectations in the ESG field, including Regulation (EU) 2019/2088 of the European Parliament and of the Council of

27 November 2019 on sustainability disclosures in the financial services sector.

However, many are the regulations and standards related to the ESG field, and many changes or technical definitions are being made to issued regulations, updates, interpretations and corrections. Renta 4 wishes to demonstrate its commitment to strict compliance with these standards and regulations and has carried out the following action to that end:

- **It has assigned employees with ESG functions** in different strategic areas of the Group to undertake the responsibilities of outlining and implementing policies and procedures (risk area, asset management area, investment committee of Gestora, HR...)
- **It has established an ESG committee** to be in charge of the coordination and oversight of initiatives related to sustainable investment and the timely reporting procedure to the Board of Directors.
- **It has hired the services of an external consultant specialised in ESG** for the financial sector, to create documentation and generated report checkpoints and, at the same time, train the teams mentioned above.

### Adherence to international ESG initiatives

All policies created by Renta 4 are developed and complemented by other specific policies, standards and commitments related to their areas of application, with a threefold objective:

- To establish clear criteria for the ESG commitment towards the organisation and society
- To comply with the requirements of the different regulations
- To adhere to international ESG initiatives.

Renta 4 Gestora has already subscribed to the United Nations Principles for Responsible Investment (UNPRI).



Renta 4 Banco has applied to join the following initiatives. In this regard, membership of UNPRI, an association that establishes the principles of responsible investment, has also been requested; membership of the Principles for Responsible Banking (UNEP FI) has also been requested, but a reply has been received from the organisation indicating that, given the composition of the bank's balance sheet, it is not appropriate for the time being to proceed with this membership; and a request has been made to join the United Nations initiative, Net Zero Banking Alliance, a partnership whereby

the Alliance's member banks undertake to set interim targets for 2030 or earlier to accelerate the shift to a net zero emissions economy by 2050.



### ESG Goals

The best way to put into effect the Group's commitment to sustainable investment and ESG criteria is to establish specific goals and deadlines to achieve them.

The degree of compliance with ESG objectives will be linked to the remuneration policies of the Board and senior management of Renta 4.

The goals shall be related to the areas of environmental care, social commitment and good governance.

- **Environmental care:** Qualitative goals are being set for carbon footprint reduction, efficient energy consumption, consideration of climate change risk in investments...
- **Social commitment:** Quantitative goals are being set to improve the working conditions of employees, pedagogical training in company investment, employee training, participation in programs for the social integration of disadvantaged groups.
- **Good governance:** Quantitative goals are being set to achieve sustainable finances such as linking Board and senior management compensation to ESG objectives, setting ESG targets...

By 2022, a certain maturity and confidence has been achieved in several of the indicators being used in ESG. Accordingly, the first ESG committee has already presented specific targets to be set as SDGs in several of these areas which, if approved by the Board of Directors, will generate the appropriate plans for their fulfilment.

### Evaluation of the degree of compliance and its impact

After analysing the different ESG rating platforms of the main listed companies, Renta 4 selected the Clarity IA platform.

The Clarity tool has been incorporated in the investment procedures of Renta 4 Gestora and the Bank to evaluate companies and compare them against each other and against a segment or market ideal.

Given that this platform that has been selected to measure other companies, it seemed reasonable that this same platform should also be chosen to evaluate our own performance in this area. As was



done in 2021, Renta 4's own rating will be periodically analysed by this company.

## **10. RENTA 4 2022 EU TAXONOMY OF SUSTAINABLE FINANCES**

The draft delegated act elaborating on EU Regulation 852/2020, on the content and presentation of information to be disaggregated by companies subject to Non-Financial Information Reporting in the framework of environmentally sustainable activities, currently requires financial entities to calculate ratios that reflect exposure to eligible activities for the purposes of the ESG Taxonomy, as well as any other information that supports the Group's business model.

This information requirement is based on the EU taxonomy determined on the basis of EU Regulation 852/2020 and its implementing legislation, which is the basis for the development of a regulatory framework for environmentally sustainable economic activities.

This regulation sets out the relationship between the six environmental goals, the NACE codes to which the eligible economic activities are linked, and the subsequent requirements for assessing the alignment of the activities with these goals. Currently only the two environmental objectives - climate change mitigation and climate change adaptation - have been developed.

In order to assess the eligibility of exposures under the EU Taxonomy, the information required from financial institutions to prepare the Financial Information Report shall at least include:

- Ratio of eligible and non-eligible assets for ESG Taxonomy purposes to total assets excluding exposures to central banks, government agencies, supranational entities.
- Ratio of exposures to central banks, government agencies, supranational entities over total assets.
- Ratio of exposures to companies not subject to non-financial reporting to total assets.
- Ratio of interbank demand loans to total assets.
- Ratio of trading book exposures to total assets.
- Ratio of derivative exposures to total assets.
- Qualitative information providing a more accurate insight into the status and evolution of the effective implementation of ESG principles in the regulations and culture of the Renta 4 Group.

In order to obtain and process the necessary quantitative and qualitative information, the Renta 4 Group's "Procedure for assessing the eligibility of exposures in accordance with the ESG taxonomy" has been followed. It should be noted that in the determination of eligibility and the rest of the data necessary for the calculation of the required ratios, internal databases have been revised, prioritised and updated, and the processes have been more automated, allowing for better control and monitoring.

### **Quantitative Information**

In compliance with the aforementioned regulations, Renta 4 presents the following ratios for the Group's own exposures to counterparties recognised on its balance sheet in 2021 and 2022:



<b>Ratios</b>	<b>dic.-22</b>	<b>dic.-21</b>	<b>Diferencia</b>
<i>Exposiciones elegibles a efectos de taxonomía ESG excluyendo Bancos Centrales y Administraciones públicas (numerador y denominador)</i>	5,16%	4,47%	0,69%
<i>Exposiciones no elegibles a efectos de taxonomía ESG excluyendo Bancos Centrales y Administraciones públicas (numerador y denominador)</i>	62,78%	95,53%	-32,75%
<i>Exposiciones a Bancos Centrales y Administraciones Públicas</i>	70,84%	62,79%	8,05%
<i>Exposiciones a empresas no sujetas a publicación de EINF</i>	11,74%	39,27%	-27,52%
<i>Exposiciones clasificadas en Cartera de Negociación (incluye derivados)</i>	2,35%	8,05%	-5,70%
<i>Exposiciones clasificadas en derivados*</i>	0,01%	0,00%	0,00%
<i>Porcentaje de exposiciones al mercado interbancario</i>	7,05%	49,25%	-42,20%

\*Los porcentajes de exposiciones clasificadas en derivados representan en diciembre de 2022 y 2021 respectivamente 0,0051% y 0,0007% del balance

The differences between the two years are mainly due to the evolution of the balance sheet, where the exposure to central banks and public administrations has increased and the exposure to the interbank market has been reduced. In addition, it is necessary to underline that there has been an improvement in the automation of processes and in the consistency and traceability of the databases, which have made it possible to obtain results with a higher level of confidence. Finally, the existing difference is also partly explained by the methodology applied in the calculation of the ratios, as better data processing and a better understanding of the regulations has led to results that are more representative of reality.

Ratio calculations have considered all exposures on the consolidated balance sheet of the Renta 4 Group in accordance with the applicable accounting standards, taking into account all relevant data from the counterparties involved in each of the exposures.

The counterparty database sources are mainly internal, derived from the information necessary for the registration and maintenance of client accounts, updated in accordance with the Group's policies and, where appropriate, reviewed in accordance with reputable external sources.

In order to assess the compatibility between the NACEs eligible for taxonomy purposes and the NACE codes of the counterparties included in the Balance Sheet, an application has been created in the internal system, which makes it possible to determine for each of these counterparties:

- ✓ Compliance with the eligibility criteria according to the ESG taxonomy.
- ✓ Coding of the activity according to the ESG taxonomy. Note that the taxonomy relates each activity to several NACE codes and that there are NACE codes that can include several activities. Through the application created, it is possible to link each CNAE of counterparties with the economic activities.
- ✓ Description of the activity according to ESG taxonomy.

Once the link between counterparty Balance Sheet exposures and their ESG eligibility has been obtained, the calculations defined for credit institutions in the delegated acts implementing Article 8 of EU Regulation 852/2020 are performed with the aforementioned specifications.

### **Qualitative Information**

The subjective scope of application of this procedure covers all of Renta 4, which is the prudential group able to be consolidated formed by Renta 4 Banco and all its subsidiaries in accordance with current accounting and prudential regulations.

In addition to the quantitative information presented, we include information that completes and provides a better understanding of the assessment of Renta 4's ESG exposure to counterparties and issuers.

- Renta 4's business model and its influence on quantitative information with respect to ESG Taxonomy

The percentage of exposures to eligible counterparties for ESG taxonomy purposes represents 5.16% of the total consolidated balance sheet excluding exposures to Central Banks, Government Agencies and supranational bodies. However, in order to interpret this result, the business model of the Group needs to be considered.

The Renta 4 Group's business model is mainly based on the intermediation and management of client assets, so that the financing received from our clients is mainly materialised in short and medium-term debt issues of central and regional governments, as well as in Eurosystem accounts and in current accounts of Credit Entities, subject to prudential supervision and domiciled in States belonging to the European Union, with the aim of preserving value for the client.

In addition, the Renta 4 Group, to a lesser extent, engages in investment lending activities, mainly in the granting of loans and guarantees, practically all of which are covered by effective collateral.

Thus, approximately 73% of on-balance sheet exposures are excluded for the purposes of the eligible exposure ratio calculations (central banks, government and trading book).

- ✓ Monitoring of the evolution and compliance with ESG regulations through the Clarity AI application.

For this purpose, aspects such as ESG Risk; ESG Impact; Impact Metrics; Degree of compliance with the UN Sustainable Development Goals; ESG Risk Analysis by productive sector; analysis of the alignment of the portfolio with the guidelines of the TVFD initiative and complementary information with respect to the ESG Taxonomy of the following portfolios are monitored through the Clarity AI application:



- ✓ Renta 4 Group's own portfolio
- ✓ Portfolio of financial assets provided as collateral for credit and collateral transactions.

**ANNEX I - INDEX OF REQUIREMENTS OF LAW 11/2018**

<b>Information required by Law 11/2018</b>	<b>Page or section of the report where the response is given</b>	<b>Reporting criteria: Selected GRIs (latest version unless otherwise stated)</b>
A brief description of the business model including context, organisation, and structure	5 - 9	GRI 2-6 (2021)
Markets in which it operates	5 - 9	GRI 2-1 (2021) GRI 2-6 (2021)
Organisational purposes and	5 - 9	GRI 2-1 (2021)



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
strategies		GRI 2-22 (2021)
Main factors and trends that may affect its future development	5 - 9	GRI 3-3 (2021) GRI 2-22 (2021)
Reporting framework used	3 - 4	GRI 1 (2021)
Principle of materiality	3 - 4	GRI 3-1 (2021) GRI 3-2 (2021)
<b>Management approach:</b> description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	11 - 18	GRI 3-3 (2021)
Detailed information on current and foreseeable effects of the company's activities on the environment and, when relevant, on health and safety	11/18	GRI 3-3 (2021)
Environmental assessment or certification procedures	11 - 18	GRI 3-3 (2021)
Resources for environmental risk prevention	11 - 18	GRI 3-3 (2021)
Application of the precautionary principle	11 - 18	GRI 2-23 (2021)
Number of provisions and guarantees for environmental risk coverage	11 - 18	GRI 3-3 (2021)
Measures to prevent, reduce, or remedy emissions that seriously affect the environment, taking into account any activity-specific form of air pollution, including noise and light pollution	11 - 18	GRI 3-3 (2021) GRI 305-7



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
Measures for prevention, recycling, reuse, other forms of recovery and waste disposal	11 - 18	GRI 306-1 GRI 306-2 GRI 306-3 to 306-5
Actions to prevent food waste	11 - 18	GRI 3-3 (2021) GRI 306-4
Water consumption and water supply according to local constraints	11 - 18	GRI 303-1 to 303-3 GRI 303-5
Consumption of raw materials and measures taken to improve the efficiency of their use	11 - 18	GRI 301-1 GRI 301-2 GRI 301-3
Direct and indirect energy consumption	11 - 18	GRI 302-1 GRI 302-3
Measures taken to improve energy efficiency	11 - 18	GRI 3-3 (2021) GRI 201-2
Use of renewable energies	11 - 18	GRI 302-1
Emissions of greenhouse gases generated as a result of the company's activities, including the use of goods and services it produces	11 - 18	GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4
Measures taken to adapt to the consequences of climate change	11 - 18	GRI 3-3 (2021) GRI 201-2
Voluntary medium and long-term reduction targets set to reduce greenhouse gas emissions and means implemented to achieve them	11 - 18	GRI 3-3 (2021) GRI 305-5
Measures taken to preserve or restore biodiversity	11 - 18	GRI 3-3 (2021)



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
		GRI 304-3
Impacts caused by activities or operations in protected areas	11 - 18	GRI 3-3 (2021) GRI 304-1 GRI 304-2
<b>Management approach:</b> description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	19 - 35	GRI 3-3 (2021)
Total number and distribution of employees by country, gender, age and job classification	19 - 35	GRI 405-1
Total number and distribution of types of employment contracts and the annual average of permanent, temporary, and part-time contracts classified by gender, age and job classification	19 - 35	GRI 2-7 (2021)
Number of dismissals by gender, age and job classification	19 - 35	GRI 3-3 (2021) GRI 401-1
Average remuneration and its evolution broken down by gender, age and job classification or equal value	19 - 35	GRI 3-3 (2021)
Salary gap, remuneration for equal or average jobs in society	19 - 35	GRI 3-3 (2021) GRI 405-2
Average remuneration of directors and managers, including variable remuneration, allowances, compensations, payment to long-term savings schemes, and any other	19 - 35	GRI 3-3 (2021)



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
payment broken down by gender		
Implementation of right to disconnect policies	19 - 35	GRI 3-3 (2021)
Number of employees with disabilities	19 - 35	GRI 3-3 (2021) GRI 405-1
Working time organisation	19 - 35	GRI 3-3 (2021)
Number of absence hours	19 - 35	GRI 3-3 (2021) GRI 403-9
Measures to facilitate the enjoyment of work and life balance and to promote the shared responsibility of both parents	19 - 35	GRI 3-3 (2021) GRI 403-3
Health and safety conditions at work	19 - 35	GRI 3-3 (2021) GRI 403-1 to 403-8
Occupational accidents, particularly their frequency and severity, as well as occupational diseases; broken down by gender	19 - 35	GRI 403-9 GRI 403-10
Organisation of social dialogue including procedures for information provision, consulting, and negotiation	19 - 35	GRI 3-3 (2021)
Mechanisms and procedures that the company has in place to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	19 - 35	GRI 3-3 (2021)
Percentage of employees covered by	19 - 35	GRI 2-30 (2021)



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
collective bargaining agreements by country		
Balance of collective agreements, particularly in the field of health and safety at work	19 - 35	GRI 3-3 (2021) GRI 403-4
Policies implemented in the field of training	19 - 35	GRI 404-2
Total number of training hours by professional category	19 - 35	GRI 3-3 (2021) GRI 404-1
Universal accessibility for people with disabilities	19 - 35	GRI 3-3 (2021)
Measures taken to promote equal treatment and opportunities between women and men	19 - 35	GRI 3-3 (2021)
Equality plans, measures taken to promote employment, protocols against sexual harassment on the grounds of gender and discrimination	19 - 35	GRI 3-3 (2021)
Policy against all forms of discrimination and, where appropriate, diversity management	19 - 35	GRI 3-3 (2021)
<b>Management approach:</b> description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	36 - 42	GRI 3-3 (2021)
Application of human rights due diligence procedures, prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage, and redress	36 - 42	GRI 2-23 (2021) GRI 2-26 (2021) GRI 410-1 GRI 412-1 to 412-3



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
possible abuses		
Allegations of human rights violations	36 - 42	GRI 3-3 (2021) GRI 406-1 (2016)
Measures implemented for the promotion and fulfilment of the provisions of the fundamental ILO conventions concerning respect for freedom of association and the right to collective bargaining; the elimination of discrimination in respect of employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour	36 - 42	GRI 3-3 (2021) GRI 407-1 GRI 408-1 GRI 409-1
<b>Management approach:</b> description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	43 - 47	GRI 3-3 (2021)
Measures taken to prevent corruption and bribery	43 - 47	GRI 3-3 (2021) GRI 2-23 (2021) GRI 2-26 (2021) GRI 205-1 to 205-3
Measures to prevent money laundering	43 - 47	GRI 3-3 (2021) GRI 2-23 (2021) GRI 2-26 (2021) GRI 205-1 to 205-3



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
Contributions to foundations and non-profit organisations	43 - 47	GRI 2-28 (2021) GRI 201-1 GRI 415-1
<b>Management approach:</b> description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	48 - 60	GRI 3-3 (2021)
The impact of the company's activities on employment and local development	48 - 60	GRI 3-3 (2021) GRI 203-2 GRI 204-1
The impact of the company's activities on local populations and the territory	48 - 60	GRI 3-3 (2021) GRI 413-1 GRI 413-2 GRI 411-1
Relationships maintained with local community people and dialogue approaches	48 - 60	GRI 2-29 (2021) GRI 413-1
Partnership or sponsorship actions	48 - 60	GRI 3-3 (2021) GRI 201-1
Inclusion of social, gender equality and environmental issues in the procurement policy	48 - 60	GRI 3-3 (2021)
Consideration in relationships with suppliers and sub-contractors of their social and environmental responsibility	48 - 60	GRI 2-6 (2021) GRI 308-1 GRI 414-1



Information required by Law 11/2018	Page or section of the report where the response is given	Reporting criteria: Selected GRIs (latest version unless otherwise stated)
Monitoring and audit systems and results	48 - 60	GRI 2-6 (2021) GRI 308-2 GRI 414-2
Measures for the health and safety of consumers	48 - 60	GRI 3-3 (2021) GRI 416-1
Systems to manage complaints received and their resolution	48 - 60	GRI 3-3 (2021) GRI 418-1
Benefits obtained by country	48 - 60	GRI 3-3 (2021) GRI 207-4
Taxes on profits paid	48 - 60	GRI 3-3 (2021) GRI 201-1 GRI 207-4
Public subsidies received	48 - 60	GRI 201-4
ESG Commitment	61 - 66	
RENTA 4 2022 EU TAXONOMY OF SUSTAINABLE FINANCES	67 - 70	