

20

NFIS REPORT

**Consolidated
Non-Financial
Information
Statement**

FOR THE YEAR ENDED 31 DECEMBER 2020



Index

Appendix. Non-Financial information Statement pursuant to Law 11/2018, of 28 December, in relation to non-financial information and diversity 3

01. About Cecabank 4

- COVID-19 4
- 01A. Our business model 5
- 01B. Cecabank profile 6
- 01C. Market environment and business strategy 8

02. Our customers 11

- Business diversification 12
- Client diversification 12
- Segment diversification 13

03. Management of people 15

- 03A. Our employees 15
- 03B. Equality 17
- 03C. Training 18
- 03D. Remuneration 20
- 03E. Employee benefits 22
- 03F. Reconciliation 23
- 03G. Prevention of occupational hazards 24

04. Our suppliers 26

05. Social Matters 28

06. Environmental issues 31

07. Human rights matters 35

08. Anti-corruption and anti-bribery information 36

09. Tax and accounting information 38

Appendices 39

- Appendix 1: Comparison of the number of employees by professional category in 2019 and 2020 39
- Appendix 2: Comparison of training hours in 2019 and 2020 40
- Appendix 3: Table of compliance with law 11/2018 (28 december) 41

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

This non-financial information statement is issued in compliance with Law 11/2018, of 28 December, amending the Spanish Commercial Code, the Consolidated Spanish Limited Liability Companies Law approved by Legislative Royal Decree 1/2010, of 2 July, and Spanish Audit Law 22/2015, of 20 July, in relation to non-financial information and diversity.

This document refers to CECA's activity. However, given that Cecabank represents the great majority of CECA's business volume, the information presented in this non-financial information statement largely relates to Cecabank, and therefore this information may be considered to represent the Company.

For the preparation of this non-financial information statement, the Global Reporting Initiative (GRI) standard, which is recognised internationally, was used as the standard for reporting, following the principles and contents defined by the most recent version, GRI Standards.

When preparing the non-financial information's date, the Company has also taken into account the industry context and regulations, as well as the main demands, trends and best practices in order to determine which non-financial matters are material to CECA.

As a result, and taking into consideration the Cecabank's business model, the following matters were identified as the most material:



Asimismo, y de conformidad con lo establecido en la Ley 11/2018 de 28 de diciembre, se informa de que el presente Estado de Información No Financiera forma parte del Informe de Gestión Consolidado de Cecabank, presentándose en un documento separado.

A continuación, en respuesta a dichos aspectos materiales, se describen las principales líneas del desempeño extra financiero relativas a las cuestiones medioambientales, sociales, relativas al personal y a los derechos humanos, y los referidos a la lucha contra la corrupción y el soborno.

01. About Cecabank



COVID-19

Cecabank, a Spanish bank offering specialised banking services, has shown, since the beginning of the pandemic, a high level of concern for guaranteeing the safety and health of its employees and their families. It has provided telematic work and adapted its branches to the new health security requirements, establishing measures to prevent the transmission of COVID-19 while maintaining the high quality of customer service.

Thanks to the measures adopted and the solidarity activity exercised in the prevention and minimisation of the risks caused by COVID-19, the Bank has been recognised by the Community of Madrid with the “Madrid Guarantee” label, which distinguishes the

company’s commitment to minimising the impact of the coronavirus. This recognises Cecabank’s compliance with the rules related to the prevention of COVID-19 and the extraordinary measures adopted to offer its employees and customers the best experience and the best services.

This commitment has been reinforced with Cecabank’s recent accession to the CEOE Foundation’s Sumamos Salud+Economía Plan, which aims to support public administrations in mitigating the adverse effects of the pandemic and the autonomous communities in containing the virus, reinforcing the actions of the competent health authorities and providing companies with tools to help curb contagion..

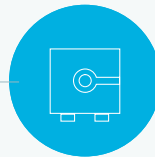
01A. Our business model

Cecabank is a Spanish wholesale bank that offers innovative, customised financial solutions to its customers, which it accompanies in projects so that they can achieve their business objectives.

Our areas of specialisation, in which we can say we offer innovative financial solutions are grouped into these lines: Securities Services, Treasury and Banking Services –although the latter is subdivided into Digital Solutions and Payments –:

Securities Services

Focused on maintaining its leadership in the depositary business, complementing the service offering of the Securities Services value chain and catalysing inroads in other markets.



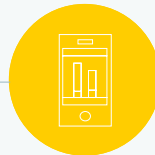
Treasury management

Focusing on increasing the returns, completing the offering with new services and maintaining its leadership in the banknote business in Spain.



Banking services

providing the market with multiple solutions in a mature business that is conditioned by new players and regulatory changes, with the objective of attaining and increasing the degree of customer loyalty, generating economies of scale and establishing collaborate of models in order to obtain new business. These banking services can be divided into the following:



Digital Solutions: which focus on services relating to the digitalisation of related services, omnichannel services and business intelligence, technological solutions, technology outsourcing and normative adaptation through reporting services and the Treasury and Risks platform.



Payments: focused on processing and means of payment solutions, infrastructure and international payments, provides markets with multiple solutions in a mature business conditioned by new adjustments in the sector and new players.

Cecabank also provides the associative services necessary for the proper functioning of the banking association CECA, focused on the dissemination, defence and

representation of the interests of its member institutions, as well as the training services provided by the Banking Training School.



For further information about the services that Cecabank offers, click on the link on the corporate website.

01B.

Cecabank profile

Cecabank is headquartered in Madrid. It also has one operational branch in Lisbon and two representative offices in Frankfurt and London.

In 2020 the London operational branch turned into a representative office and the Paris representative office was closed.

Cecabank's shareholder portfolio comprises the following entities:

Entity	Number of shares	% shareholding
CECA	100,000,000	89.08 %
CaixaBank, S.A.	3,059,729	2.73 %
Bankia, S.A.	2,848,192	2.54 %
Kutxabank, S.A.	1,352,325	1.20 %
Unicaja Banco, S.A.	1,299,440	1.16 %
Liberbank, S.A.	888,958	0.79 %
Ibercaja Banco, S.A.	765,561	0.68 %
Abanca Corporación Bancaria, S.A.	712,677	0.63 %
Banco Bilbao Vizcaya Argentaria, S.A.	644,683	0.57 %
Banco Sabadell, S.A.	574,171	0.51 %
C.A. y M.P. Ontinient	57,920	0.05 %
Caixa D'Estalvis de Pollença	52,884	0.05 %

With regard to Cecabank's organisation and structure, the entity's corporate governance consists of a set of rules, principles and policies that regulate the composition, structure and functioning of the governing bodies (the General Meeting of Shareholders, the Board of Directors and its Committees), which are continually updated to adapt to the best national and international practices.

Cecabank's General Meeting of Shareholders is the highest body for the representation and participation of shareholders in the Bank. For its part, the Board of Directors has the broadest powers for the administration of the Entity and, except in matters reserved for the competence of the General Meeting, in accordance with the provisions of applicable legislation and the Bylaws, is the highest decision-making body and is responsible for the risks assumed by the Entity.

The Board of Directors of Cecabank is composed of the number of members appointed by the General

Shareholders' Meeting, which, in accordance with the regulations applicable to capital companies, may not be less than 5 or more than 15. The General Shareholders' Meeting of 26 March 2019 set the number of members of the Board of Directors at twelve, of which seven are proprietary directors, four are independent directors and one is an executive director. Since then and throughout 2020, the structure of the Board of Directors has remained unchanged.

Furthermore, in compliance with the regulations governing capital companies and the regulation, supervision and solvency of credit institutions, Cecabank has set up four committees, namely the Audit Committee, the Appointments Committee, the Remuneration Committee and the Risk Committee, all of which are made up of non-executive directors, in line with the provisions of the regulations for each of them, and with the functions set out in their respective operating regulations.

Full details on the composition, functions and operation of the General Meeting, the Board of Directors and the specialised Committees can be found in both the Articles of Association and their operating regulations, which are available in the "corporate information" section of [Cecabank's](#) corporate website.

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

CECA
100,000,000
89.08 %

CaixaBank, S.A.

3,059,729

2.73 %

Bankia, S.A.

2,848,192

2.54 %

Kutxabank, S.A.

1,352,325

1.20 %

Unicaja Banco, S.A.

1,299,440

1.16 %

Liberbank, S.A.

888,958

0.79 %

Ibercaja Banco, S.A.

765,561

0.68 %

Abanca Corporación Bancaria, S.A.

712,677

0.63 %

Banco Bilbao Vizcaya Argentaria, S.A.

644.683

0.57 %

Banco Sabadell, S.A.

574,171

0.51 %

C.A. y M.P. Ontinient

57,920

0.05 %

Caixa D'Estalvis de Pollença

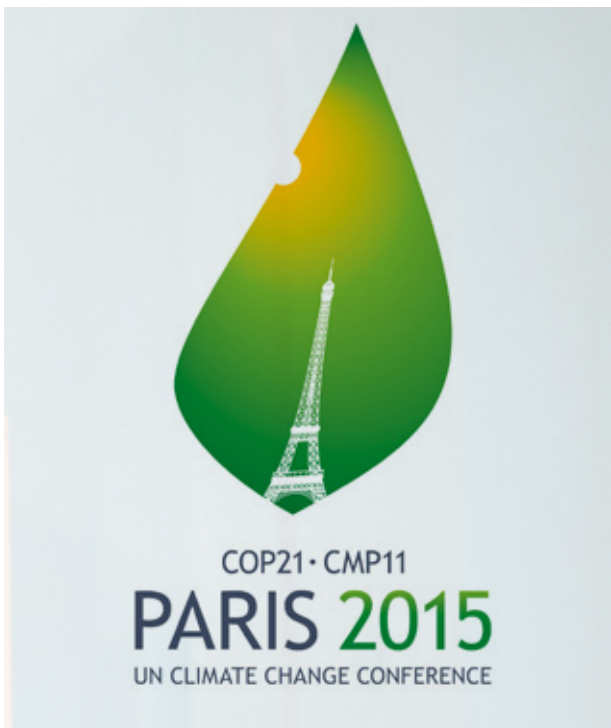
52,884

0.05 %

01C.

Market environment and business strategy

One of the large transformations taking place in the global financial industry is the growing connection between sustainability, economic activity and financing.



This change process has a global roadmap: the Sustainable Development Goals (ODG), also known as Agenda 2030 and, with respect to the climate aspects, the Paris Agreement (COP-21).

Consensus around these objectives is permitting the transformation to accelerate.

The Spanish financial industry in general and Cecabank in particular have a vocation to contribute to economic and financial activities that are more sustainable and responsible and, therefore, the Bank's objectives and strategy includes the promotion and strengthening of our Sustainability Plan 2018-2020, the essential actions and efforts of which are:

- Increase public awareness of Sustainability.
 - Seminars and debates with Stakeholders.
 - Continue and encourage new actions under the Social Action Plan.
 - Volunteer and Financial Education initiatives.
 - Workplace initiatives such as the reduction of consumption and the promotion of healthy habits.
- The encouragement of training and outreach actions.
 - Diversity Plan, participation in public initiatives, awareness-raising.
 - Continuous improvement and comparison with listed companies in terms of corporate governance.
 - Dissemination and monitoring of the Code and Corporate Conduct Channel.
- Improve transparency and the Framework for Reporting and Disclosure of Non-Financial Information.
 - Supporting clients on sustainability-related issues.
 - Participation in the Sustainable Finance Market.



Those defined objectives and strategies are the core of Cecabank’s extra financial performance based on:



Cecabank Values:

Solvency, Integrity, Specialization, Innovation and Customer Service. For further information about our values and its corporate culture at Cecabank, click on the link on the [corporate website](#).



Sustainability Plan:

Cecabank used a materiality study to present a plan to develop its relationship with stakeholders. The Sustainability Plan is defined as the lever for directly or indirectly strengthening the business, human and material resources and Cecabank’s relationships with society.



Ethics and transparency:

Cecabank has a Corporate Code of Conduct which formalises the commitment of all its professionals to maintaining the highest standards of professional integrity and ethics. It also has in place control structures and procedures for the prevention of money laundering, a criminal compliance system, an Internal Rules of Conduct for securities market activities, proprietary codes for the treasury room, as well as a Euribor protocol and code of conduct. For further information regarding these documents, click on the link to the corporate website.



Órganos de Gobierno:

Lastly, in terms of corporate governance matters, Cecabank works in accordance with industry best practices and regulatory requirements. The Bank’s website contains information on the most relevant corporate governance issues in the last year.

The wholesale approach of Cecabank's business determines the material aspects of the Sustainability Plan and defines its scope. This wholesale approach focuses on providing services to professional customers that engage in highly sophisticated business activities and features lasting relationships characterised by mutual trust. Within this context, sustainability criteria are included in Cecabank's business through:



The general control framework: The organisational structure and the internal control mechanisms are geared towards guaranteeing that the Bank's activities are efficient and effective, that the information is reliable, timely and complete, and that the applicable laws are complied with. The general control framework is a coherent, balanced system, equipped with controls at all levels of responsibility..



La política de riesgos: Cecabank's risk management philosophy is based on strict prudential criteria, in keeping with its commercial strategy, and ensures that the capital allocated to the various business units is used efficiently. The risk tolerance defined by the Board of Directors reflects a conservative strategy that seeks to conserve a medium-low risk profile; a strategy that is focused on safeguarding the quantity and quality of capital, with capital adequacy ratios clearly in excess of the regulatory minimum requirements; a strategy with respect to which it can reasonably be predicted that none of the risks identified will give rise to losses that cannot be assumed in the normal course of the Entity's operations. Further information on the Bank's risk policy can be obtained in the Governance Structure and Practices report in Cecabank's consolidated directors' report and in the Pillar 3 Prudential Relevance Report (PRR), both available on the corporate website.

The risk management structure and the reputational risk analysis system include certain aspects of social responsibility. Cecabank analyses the public information available in this area on its potential counterparties, such as the existence of a Sustainability Plan and, their organisational structure in this respect or whether they offer responsible products and services. This assessment is part of the non-financial analysis of attentional counterparties.

A roadmap for environmental and climate risks has recently been started by first analyzing the materiality of these risks.



Service excellence: Cecabank's customers are large entities, in the financial services industry in particular, who demand service of the highest quality. Cecabank therefore places emphasis on excellence in the performance of its day-to-day activities to which effect it has highly specialised professionals. This excellence is founded on special attention to human capital, prudent risk management and high technological capabilities.

02. Our customers






Customer Orientation is one of Cecabank's values: we are in permanent contact with our customers to detect their priorities and anticipate their needs.

For Cecabank it is fundamental to put the customer at the center and to generate good experiences in each and every interaction with them. Good satisfaction means that the products and/or services are meeting our customers' expectations. This results in customer loyalty and also in the possibility of attracting new users.

In this context, Cecabank provides services to more than 300 clients, including banks, asset managers, insurance companies, large corporations, fintech, venture capital firms and public administrations, extending the culture of customer focus and continuous improvement throughout the organisation.

Customer diversification is one of the objectives defined in Cecabank's Strategic Plan, which runs from 2017-2020 and whose extension until the end of 2021 was approved by the Board of Directors in the first quarter of 2020.

Diversification in Cecabank is approached from different business areas in order to maximise opportunities. Specifically, these include:

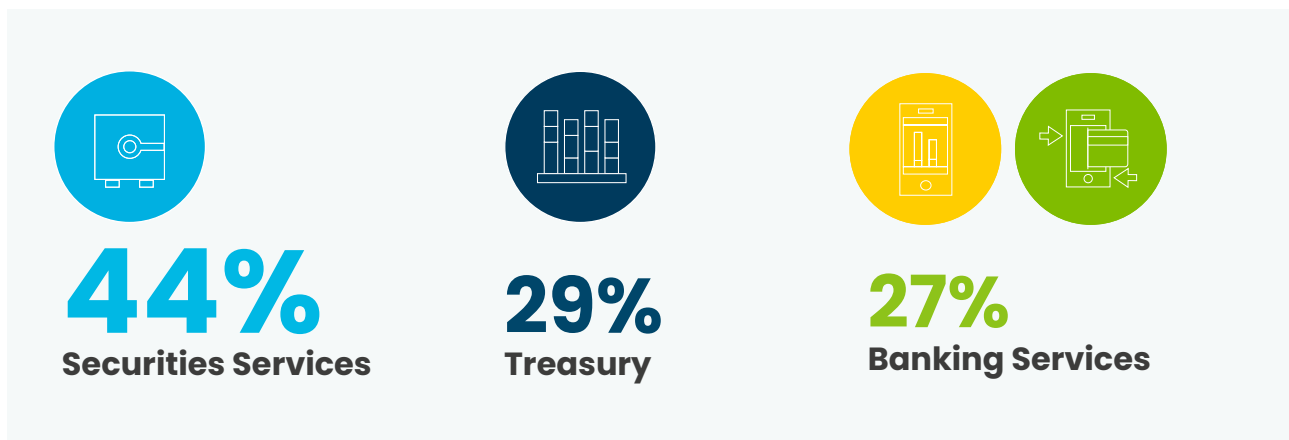
-  Business diversification
-  Client diversification
-  Segment diversification

Business diversification

Cecabank’s business model pursues precisely the diversification of revenues and customers, with three major business lines that are independent but complementary to each other. This model is designed to be resistant to economic cycles and this has been demonstrated over the last eight years, since Cecabank was created.

Within each of these major business lines, an extensive range of services is developed with a high component of continuous innovation, trying to identify new products and services that may be of interest to current and potential customers.

At the end of 2020, the contribution to gross income from the bank’s 3 core business lines shows a diversified picture of service revenues:



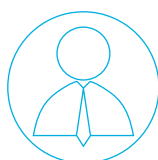
Client diversification

As a complement to the Strategic Plan, commercial objectives are defined annually, including the number of new customers (customers who have not had any relationship with Cecabank in the last 3 years).

Committee and the Board of Directors on a quarterly basis and included in the periodic report of the Strategic Plan.

The commercial objectives are monitored centrally on a monthly basis by the Strategic Coordination team and their evolution is reported to the Management

New customer acquisition in the period 2017 - 2020 has been very significant, reaching 174 new customers. The breakdown by year is shown below:



New customers

174

Segment diversification

Within the framework of segment diversification, we also monitor the distribution of customers and opportunities by segment, differentiating 4 major sectors of activity in which we distribute the customer portfolio:



Associates: entities associated with CECA.



Banks: both national and international.



Investment managers, insurance companies and investment services companies (ESIs).



Rest: including the public sector, corporates, fintechs and technology companies, among others.

On the other hand, our strategy also focuses on long-term agreements with our customers, with the aim of binding them strongly. This strategy is not only followed in the area of depository services (with agreements for periods of several years), but also in the area of banking services, especially in payment methods contracts, treasury and risk support platforms, technological outsourcing and electronic banking.

This strategy of long-term agreements has increased the contribution to results of the most recurrent revenues (fees and commissions) from 38% in 2012 to 70% in 2020, with a forecast of 76% in 2021.

Likewise, in the 2020 financial year, the development of the following three lines has been continued:

- Implementing and developing quality management systems in those areas where certification provides differential value.
- Measure and analyse the voice of the customer, converting customer information into key business support for decision-making.
- Establish improvement plans aimed at:
 - a. Improving the quality of our processes.
 - b. Improving the customer experience, as this is the basis for establishing long-lasting and trusting relationships with customers.

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

- In 2020, the certification of the Collection and Payments Services was renewed (valid until January 2024) and the certifications of the Securities and Depository Services, Reporting (Pyramid), and the Banking Training School were maintained, all under

the criteria of the ISO 9001:2015 standard, as well as the certification of the Information Security Management system in accordance with the ISO 27001:2014 standard for SEPA debit and transfer services.

- In the four areas certified according to ISO 9001:2015, continuous improvement and the development of the principles of the standard beyond compliance with the requirements of the standard itself have been further developed.
- In the four certified areas, progress has been made in improving the quality management system by simplifying workflows and adopting agile methodologies.
- The certification of other certified management systems has been supported and maintained for the whole of Cecabank:
 - a. Sistema de Gestión de Cumplimiento Penal certificado de acuerdo con la norma UNE 19601:2017.
 - b. Criminal Compliance Management System certified in accordance with the standard UNE 19601:2017.
- Support was provided for Cecabank's compliance assessment with the SGE 21 standard for Ethical and Socially Responsible Management.
- Coordination was carried out to obtain the three "Madrid Guarantee" labels (Compliance Measures Label, Extraordinary Measures Label and Solidarity Action Label) for Cecabank for the measures adopted, the extraordinary commitment shown and the solidarity activity carried out to prevent and minimise the risks caused by COVID-19.
- The measurement of Cecabank's greenhouse gas (GHG) footprint has been systematised and optimised, with the measurement for 2019 verified by AENOR and in 2020 estimated and verified by external auditors.
- In collaboration with Talent Management, an Employee Journey has been developed and an employee experience measurement has been carried out, identifying areas for improvement and defining action plans.
- The supplier service quality assessment process has been revised to integrate it with the corporate approval and assessment processes.
- The development and implementation of the customer measurement model has been further developed, seeking to deepen the customer corridor defined and validated with our customers in order to achieve improvement plans perfectly suited to each Service.

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

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



Satisfaction

Generally with Cecabank
(Average 0-10)



NPS

% Prescribers
% Detractors



Likelihood of further hiring

% of customers scoring 8-10

2019

8,3

2020

8,3

2019

66%

2020

65%

2019

79%

2020

81%

In addition, Cecabank has a Customer Service system in accordance with Order ECO/734/2004 of 11 March 2004 on Customer Service Departments or Services and the Customer Ombudsman for financial institutions. Only 2 complaints were received in 2020, none of which were accepted for processing as they did not fall within its remit.

It should also be noted that the services offered by Cecabank are largely based on a high level of

sophisticated technological support that guarantees data privacy and business continuity. For this reason, the Bank voluntarily assumes the highest standards and all the recommendations on technological risk assessment (ICT) proposed by the EBA, including in its scope the risks of security, change, integrity, continuity and outsourcing, all of which are included in the risk management policy.

03. Management of people



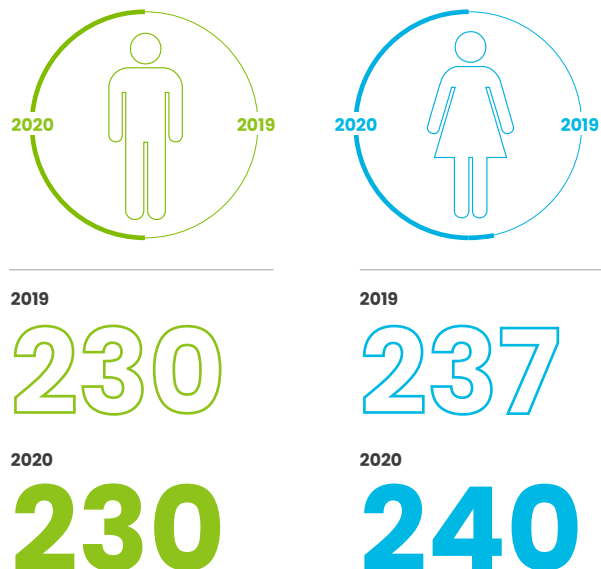
03A. Our employees

With respect to the staff, one of the lines of action defined in Cecabank’s Sustainability Plan is the responsible and sustainable management of human resources. Also, the various policies in relation to Cecabank’s professionals establish the principles of equality, integration and non-discrimination in the workplace.

CECA is made up of two employees in Spain (2 full-time female employees belonging to level VII and level X) and four part-time employees who are members of Cecabank’s Management Committee.

Cecabank has 470 employees in Spain and four in the foreign office network (1 employee in Frankfurt, 2 in London and 1 in Lisbon). In the report on the other indicators in the Non-Financial Information State relating to the section “Our employees”, the data relating to the employees at offices located outside of Spain have been excluded as they only represent 0.8% of Cecabank’s total employees.

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



<30

2019
4

2020
2

30-50

2019
310

2020
300

>50

2019
153

2020
168

	Nivel I	Nivel II	Nivel III	Nivel IV	Nivel V	Nivel VI	Nivel VII	Nivel VIII	Nivel IX	Nivel X	Nivel XI	Nivel XII	Nivel XIII
Grupo 1													
Male	3	5	18	30	32	63	31	26	9	8	1	1	0
Female	-	3	9	17	26	56	44	54	16	7	4	4	0
Grupo 2													
Male	1	2	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-	-	-

Note 1: Group 2, consisting of 3 people not involved with financial duties, receive remuneration and have professional levels that are different from Group 1. For a comparison of the number of employees in relation to 2019, see Annex I.

Note 2: It should be noted that the employee figures for 2019 and 2020 do not include the CEO of Cecabank due to the commercial nature of his relationship with the Entity or the two employees of the investee Trionis.

All Cecabank’s employees have indefinite-term employment contracts and work full time except for some employees who have reduced working hours.

During 2020 there were seven exits, 4 dismissals and 2 voluntary leaves involving 2 women and a disengagement of a woman.

The 4 dismissals break down into three men and one woman. Of the men, one belongs to the professional group of level V and with an age range over 50 and the other two belong to level VI with an age range between 30 and 50 and one over 50. The woman belongs to the professional category of level VIII and is in the age range between 30 and 50.

During 2020, there have been 10 new employee registrations, seven women and three men.

The data regarding the entry and exit of employees is set out below:

Additions



Terminations



The Human Resource Transformation Plan CRECE is one of the lines included in the 2017-2020 Strategic Plan and the new Internal Mobility Policy forms part of those lines.

This Policy seeks to underscore Cecabank's commitment to the growth and professional development of its employees and provide them with the possibility of learning new ways of working, acquire knowledge in different areas and strengthen their internal employability.

The internal Mobility Policy is intended to establish the basic principles and present the working procedure that will be followed in those cases in which, after the Resource Analysis and Planning process is carried out by the Human Resources Division, the conclusion is reached that personnel needs should be covered by the Bank's current personnel.

Accordingly, this Policy will allow:



The establishment of common rules and criteria, known throughout the Bank.



The creation of a professional development formula for employees.



The strengthening the exchange of knowledge among departments.

The data relating to bank employee internal mobility are as follows:



03B. Equality

In 2017, the modification of the Plan for Equality between women and men and reconciliation of work and family life was approved. In the following years, detailed studies have been carried out on equality (pay gap and awareness measures), work has been carried out on training actions on diversity for the entire workforce and an action plan has been established to obtain recognition in this area.

Since 2020, we have been working on updating the Equality Plan to bring it into line with current legislation.

The Equality Plan regulates the functions of the Equality Committee, establishes positive action measures and includes the improvements in measures for reconciling work and family life that have been agreed between

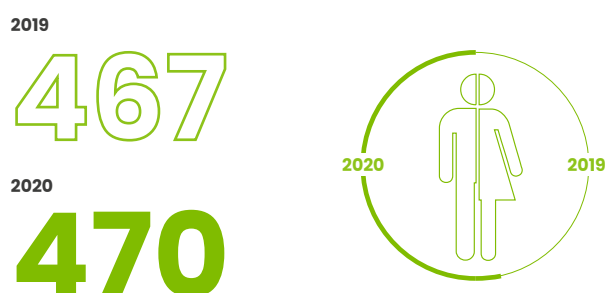
the workers' representatives and the organisation. It also includes a Protocol to prevent any type of sexual harassment and discrimination based on sex. This Protocol has been modified in 2020 by the Labour Agreement for the implementation of the protocol for actions in the event of complaints of workplace harassment, sexual harassment and harassment based on sex in Cecabank. It is a labor agreement signed with the entire labor representation of the workforce and regulates, for the first time, workplace harassment.

The main objectives of the Equality Plan are the effective application of the principle of equality between

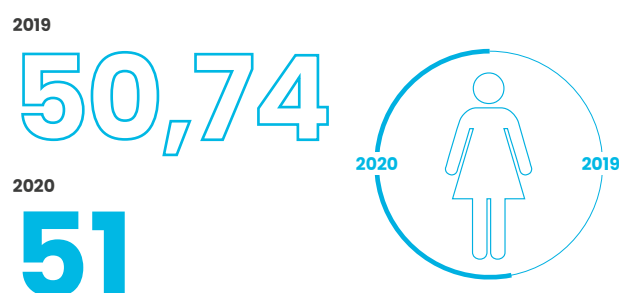
women and men, the promotion of the presence of the under-represented sex in decision-making positions or functions, improving women's possibilities of access to positions of responsibility, the reduction of inequalities and the reconciliation of family, personal and working life. It also guarantees training plans that facilitate the equal development of skills and competences regardless of gender.

Cecabank, due to the enrichment of its selection processes, has people with disabilities both in its workforce and in the selection of temporary employment agencies, thus obtaining the incorporation of 1 woman to the workforce and 5 people to provide temporary services through these agencies. Cecabank also collaborates with organisations that promote the inclusion of people with disabilities in the workplace.

Total number of employees at Cecabank



Percentage of women at Cecabank



03C. Training

Training at Cecabank is geared towards strengthening specialisation and the development of new skills by its employees, which is accredited by means of official certifications. We are promoting the transformation of the Bank through new ways of working, such as the implementation of different "agile" methodologies that put into practice personal and digital competencies.

In keeping with the Bank's objectives regarding ongoing improvement, the training is reviewed and adapted to ensure that those employed at Cecabank are prepared to respond to the needs of our customers and the market.

The Annual Development and Training Plan encompasses different knowledge areas, ranging from regulations and legislation, finance, IT and digital competencies to management and health and well-being.

Throughout 2020 the entity has been forced to make changes to the original training and development plan in order to adapt to the general situation brought about by COVID-19. A significant investment was made to create new content to help employees cope with the circumstances, both in terms of technical knowledge of new tools and the acquisition of skills to cope in the digital environment, in order to maintain the level of

Indicator description	Indicator units	2019	2020
% of employees with various types of university degree (engineers, graduates, diploma-holders)	Percentage (%)	78.00%	77.00%
Hours of training (employees' of Cecabank Spain)	Hours per employee	45 *hours	35 *hours
Investment in employee training in Spain	Euro per employee	1,191 €	916 €

Note 3: Training hours in both 2019 and 2020 are based on employees who have received some training, even if it is the minimum mandatory training. For comparative data see Annex 2.

quality to which our customers are accustomed. We also offered online content and live training via Teams, whose priority was to maintain the emotional health of the employees and help them through the difficult times they were going through.

The new Learning Cloud platform, which is available in a mobile version, has been a great help throughout this process. This tool is integrated with the training website, which records all the training activities carried out by the people who work at Cecabank. It also integrates all this activity into its curriculum and allows managers to view the courses requested by their teams where they are.

In this way, the training catalogue has been substantially strengthened in the areas of digital skills and competencies. In this line, the entity continues to work on the change towards microlearning content, which makes it more efficient for students to make the most of it and reduces the number of hours.

Our philosophy of promoting in-company specialisation programmes to the detriment of external Masters has proved successful, as it has allowed us to continue with our programming in digital format without the need to cancel training during confinement. Cecabank's experience has shown that this approach means a greater adaptation of content to needs, a reduction in training hours and a better use of the budget, without reducing the quality of the programmes or the level of student satisfaction.

Below are the training hours by professional category according to agreement, which amounted to a total of 15,869 hours in 2020:

	Category I	Category II	Category III	Category IV	Category V	Category VI	Category VII	Category VIII	Category IX	Category X	Category XI	Category XII	Category XIII
Group 1	106	403	941	1839	2329	3322	2754	2082	1436	335	193	103	-
Group 2	5	21	-	-	-	-	-	-	-	-	-	-	-

Overall assessment of the course



Very satisfied	Satisfied	Dissatisfied	Not satisfied
1,075	944	202	19



N° Surveys

2,254

Would you recommend the course to anyone else?



Training hours

15,869

The impact of COVID and the commitment to shorter and more interactive courses has been reflected in the reduction of training hours compared to 2019.

The context in 2020 has not allowed us to maintain the number of internship scholarships of previous years,

having reduced them to seven students. Continuing with Cecabank's commitment to promote employment and internship training, the bank has updated many of its current agreements with universities and study centers.

03D. Remuneration

Cecabank has a remuneration policy which sets out among other elements the general principles of the remuneration system as well as its key characteristics, the particular requirements of each employee group and the governance model.

In order to calculate average remuneration, 100% of the fixed component for all employees was taken into consideration and the variable component was included for 95.78% of Cecabank's staff, consisting of the employees in Spain and abroad, based on data at the end of 2020. Specifically, the calculation does not include the variable remuneration paid to 20 employees working in the Treasury and Equity Sales Divisions in the Financial Area. Those employees have a specific variable remuneration system that could reach 200% of their fixed remuneration and which, in accordance with Prudential remuneration regulations, is subject to deferral, payments in nonpecuniary instruments, as well as malus and "claw back" clauses should certain events occur in accordance with the general remuneration policy at Cecabank.

The average salaries,* by gender, age and professional category in accordance with the collective agreement is indicated below:

Average remuneration by gender



2019 **74,813 €** 2020 **73,621 €**



2019 **62,075 €** 2020 **59,915 €**

* The average remuneration data for 2020 have been calculated following the same criteria and perimeter as for the calculation of the 2019 data in order to facilitate comparability between them.

Average remuneration by age

<30
2019 **35,653 €** 2020 **29,037 €**

30-50
2019 **67,019 €** 2020 **65,681 €**

>50
2019 **71,783 €** 2020 **68,655 €**

Average remuneration by professional category

	2019	2020
Category II	159,524 €	144,062 €
Category III	131,627 €	132,169 €
Category IV	96,424 €	88,680 €
Category V	78,267 €	75,820 €
Category VI	63,523 €	63,354 €
Category VII	59,936 €	57,150 €
Category VIII	50,489 €	48,405 €
Category IX	46,409 €	48,099 €
Category X	42,331 €	40,657 €
Category XI	42,468 €	33,667 €
Category XII	25,528 €	24,972 €
Category XIII	26,185 €	-

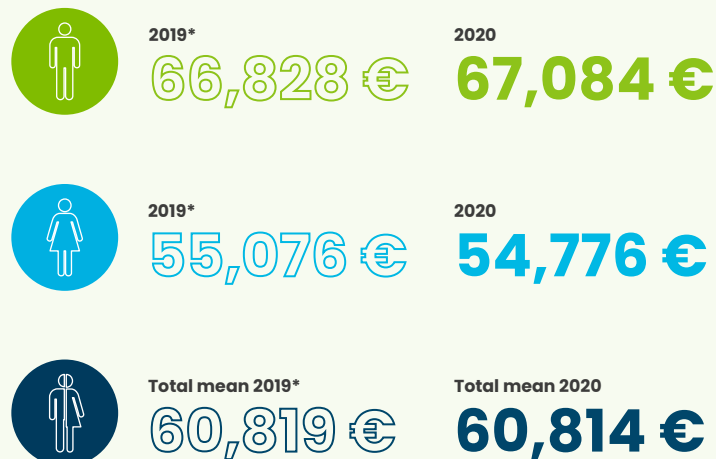
Note 4: Persons assigned to Professional Group 2 for the purpose of calculating average remuneration have been integrated into Pay Level X.

As a complementary measure, Cecabank has calculated the pay gap taking into account not the average remuneration, but the median remuneration by gender, taking into account the fixed and variable components of all its employees, both in Spain and abroad.

Taking this variable into account, the gap would be 18.35%, the evolution data being presented in the following table:

Median remuneration

Calculation taking into account employees and managers



Gender Pay Gap



* The 2019 figures have been recalculated taking into account Senior Management.

There are 12 directors at Cecabank, of whom 9 are men and 3 are women. Cecabank's directors only receive income from the entity for attendance fees for both the Board of Directors and its committees and delegated commissions. The individual amount of the per diem is the same for all directors, so the total amounts received by each director depend exclusively on the number of meetings of the governing bodies attended.

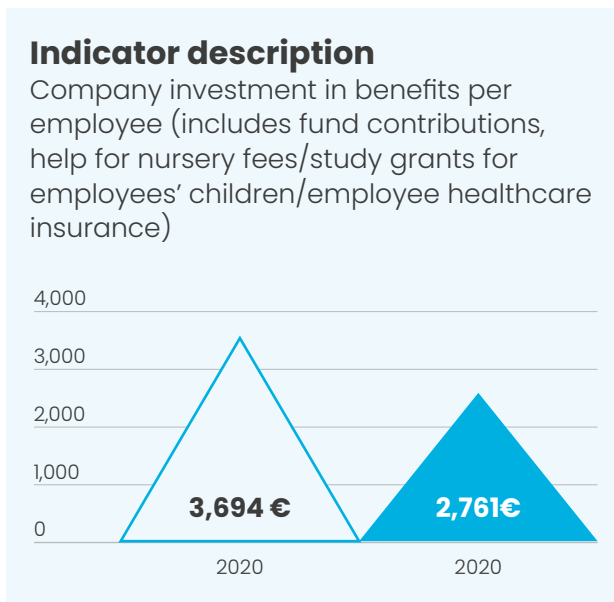
In 2020, the average amount received by each director was 33,620.76 euros for men and 53,793.22 euros for women. In 2019, the amount was 28,250 euros for men and 50,333 euros for women.

With regard to Senior Management, Cecabank has 7 managers, of which 6 are men and 1 is a woman. The average remuneration received by each executive is 196 thousand euros in 2020. The breakdown by gender and the salary gap of senior management is not included, as this would entail the direct publication of any manager, which would violate the right to data protection. In 2019, the average remuneration received per executive was 279 thousand euros. The average amount of vested pension rights received in 2020 was EUR 424 thousand and EUR 340 thousand in 2019.

03E. Employee benefits






Cecabank offers its employees certain benefits to motivate and retain them and build on their loyalty. The main benefits that Cecabank offers its employees are: financial advantages, reconciliation measures (flexibility or additional leaves), group life insurance, group health insurance, nursery cheques and assistance for education and toys for the children of employees.

The per-employee investment for benefits by the Bank in 2020 is set out below:

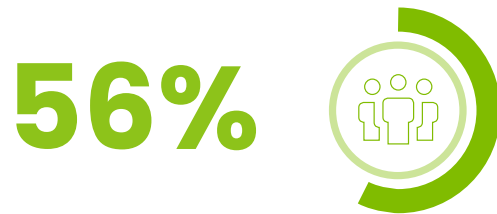


Since 2018 Cecabank has a flexible remuneration plan for its employees that allowed them to contract products and services affording tax benefits.

At present, the products available under the "Ckb.Flex" flexible remuneration plan are as follows:

-  Nursery cheques.
-  Training cheques.
-  Transport card.
-  Meal vouchers.
-  Healthcare insurance for employee's spouse and children.

Ckb.Flex Plan acceptance





Products contracted
589

Since the outbreak of the COVID-19 pandemic, when most Cecabank employees began to telework, either full-time or part-time, the need for transport cards and food vouchers has decreased.

The Ckb.Flex plan has been widely accepted by staff, to such an extent that 65% of Cecabank's employees have contract at least one of the products offered.

A total of 589 products have been contracted and the most demanded are as follows:

-  Health insurance for employee family members: contracted by **31%** of employees.
-  Transportation card: contracted by **35%** of employees.

As a result of the impact of Covid-19, which has meant that the vast majority of Cecabank's staff members provide their services in the form of teleworking, in whole or in part, there has been a decrease in the use of both, the transportation card and meal vouchers.

03F. Reconciliation

As part of the Human Resources Plan associated with the 2017-2020 Strategic Plan, the Bank has supported the implementation of a flexitime and teleworking system. Both of these measures have been agreed upon with Cecabank's employee representatives and formalised through the signature of two labour agreements with all the trade unions with representation at Cecabank.

With the pandemic, more than 450 employees - 98% of the workforce - have been teleworking, distributing the necessary equipment for teleworking throughout 2020.

Moreover, the publication of the collective agreement for savings banks and financial institutions, which applies to Cecabank, is the first sectoral agreement to regulate teleworking conditions in accordance with the legal requirements established in Royal Decree-Law 28/2020 of 28 September on telecommuting.

As a complement, the sectoral collective agreement has also regulated the aspects and compensations derived from the telework situation during the COVID-19 period, as well as those services provided in the telework modality that do not meet the thresholds foreseen in Royal Decree-Law 28/2020.

Cecabank's work organisation is also based on the collective bargaining agreement for savings banks and financial institutions, improving conditions by contract and applying compensatory measures to employees with special working hours through more holidays and higher remuneration.

It should be noted that the new sectoral collective bargaining agreement includes new measures for reconciling work and personal life, with the following being agreed in Possibility of applying the reduction in working hours only to the afternoon of effective work in the general timetable in the case of care or legal guardianship of children under 12 or a disabled person who does not perform a paid activity.

- Enjoyment of 15 days' breastfeeding leave to be accumulated after maternity leave.
- Creation of paid leave of up to 3 months in the case of cases of gender violence involving a change of address.
- Computation of all leave (with the exception of marriage leave) in working days.

Although Cecabank does not have a specific disconnection-from-work policy, with the publication of the collective bargaining agreement for savings banks and financial institutions, the right to digital disconnection between 19:00 and 8:00 hours is regulated for the first time at sector level, except in situations of extreme urgency.

In 2020, 19 employees took parental leave, 13 of whom were men and 6 women. In 2019, 15 employees took parental leave, 8 men and 7 women.

Parental leave



Total 2020

19

Men



Women



Total 2019

15

Men



Women



03G.

Prevention of occupational hazards

In accordance with applicable legislation, responsibility for the implementation, application and integration of the Occupational Risk Prevention System lies with the company's management. At Cecabank, the organisation of the resources necessary for the development of preventive activities has been designed in accordance with the External Prevention Service modality, which covers the preventive specialities of: Industrial Hygiene and Ergonomics and Applied Psychosociology, Occupational Medicine and Occupational Safety.

Cecabank has a Prevention Plan which establishes a set of rules and procedures through which the mechanisms for the management and integration of occupational risk prevention are developed, including the different actions in preventive matters, such as policy, objectives and goals, organisational structure of occupational risk prevention, responsibilities and functions within the organisation and monitoring and control at the level of integration.

The operational procedures included in the Prevention Plan include contracting procedures, material and human resources, contracts and subcontracts, information and training procedures, consultation and participation of workers, action in the event of an emergency, etc.

Cecabank, S.A. has contracted the speciality of Occupational Medicine with the External Prevention Service of QUIRON PREVENCIÓN, S.L.U., whose activities include monitoring the health of workers in relation to the risks derived from work, analyses, medical examinations and epidemiological studies of the results of health examinations in order to investigate and analyse the possible relationships between exposure to occupational risks and damage to health.

In addition, the company has a doctor, external personnel subcontracted by the External Prevention Service, located at the work centre, where he carries out medical care work.

Accidents at work and occupational illnesses of employees are covered by MC Mutual, a mutual insurance company for accidents at work and occupational illnesses.

As part of the 2017-2020 Strategic Plan, Cecabank drew up the Ckbe-Well Plan, which includes a series of actions to promote healthy behaviors and habits aimed at improving the wellbeing of our employees.

Since its inception, a physiotherapy service has been promoted to improve health through the prevention and treatment of work-related injuries, a nutrition and dietetics service for employees, back school courses, training in healthy eating, etc.

Cecabank also provides training and information for its employees, through its Training department, with courses on occupational hazards and preventive measures for all employees, data display screens, as well as training for intervention teams in fire-fighting and first aid measures.

During 2020, due to the COVID-19 pandemic, some of the scheduled face-to-face activities have been affected as the organisation has opted for and promoted, to a large extent, teleworking.

With regard to the Ckbe-Well Programme, it should be pointed out that, for the same reason, the programme has been interrupted in all face-to-face activities, although online activities have been maintained, such as back school courses, other training related to occupational risk prevention, as well as seminars focused on emotional wellbeing.

With regard to the medical examinations planned for 2020, only part of the planned examinations could be carried out. In 2021, the campaign will start and the entire workforce will be offered the check-up again.

During this year, a series of specific procedures have been established for action against COVID-19 in our buildings, relating to protection measures, the use of epis, masks, protective screens, etc., distancing measures, access to buildings and other measures specific to our sector, which have been published on the intranet and are available to all employees.

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

Cecabank, as a company that advocates health and safety, has arranged with a clinic to carry out a serology test on all employees who join the workplace in person.

In 2020, 100% of employees were represented on the Health and Safety Committee, a joint body that meets quarterly and is governed by the single Regulations of the Health and Safety Committee.

The percentage of employees covered by collective bargaining agreements in Spain and the hours of absenteeism recorded in 2019 and 2020 are shown below:

Percentage of employees covered by collective agreement in Spain

2019

100%

2020

100%

Company absenteeism in hours

2019

19,219

2020

14,592

Note 5: In order to measure Cecabank's absenteeism hours, in accordance with the GRI 403-2 indicator, only the hours of absence due to COVID, illness and IT accidents were taken into account.

In 2020, there were no occupational illnesses among the workforce, and only two occupational accidents were recorded, both without sick leave (one male and one female).

As a result of these policies, we can highlight that the workforce has been retained as a way of retaining value and knowledge. The average length of service

of the workforce, 18 years, is a reflection of this mutual commitment to permanence.

In terms of social dialogue, the company has a Works Committee with 17 members, representing 4 trade union sections that meet every two months; an Equality and Sexual Harassment Prevention Committee and a Control Committee.

04. Our suppliers



Cecabank has 104 non-resident suppliers and 591 Spanish suppliers, which represents 85% of the total volume of suppliers, resulting in a positive impact on the creation of employment and local development.



Suppliers

Non-resident suppliers

104

Suppliers

591

Employment and local development

85%



The suppliers are an essential link in the value chain of our products and/or services. Cecabank has a Corporate Purchasing Model the basic elements of which are:

- The Corporate Code of Conduct for relationships with suppliers and commercial partners.
- The Corporate Code of Conduct for relationsThe supplier certification process.
- The “Supplier Selection” internal regulation, to ensure consistency in each provisioning process and the adequate assessment of the suppliers.
- The periodic reassessment and generation of revenue procedure: performance of service quality and level surveys and reassessment of certifications.
- The services and functions outsourcing policy.
- The custody function delegation policy.

Integrity is a central value inherent to the corporate culture at Cecabank. For this reason, the Code of Conduct for commercial relationships establishes the basic principles for building, in this environment, an integral, transparent, honest and productive institution: impartiality, competitiveness, transparency, confidentiality, equality and non-discrimination should be at the forefront of the supplier selection process. Cecabank undertakes to maintain a transparent, loyal and responsible relationship with its suppliers, set up channels of communication to ascertain their expectations and establish fair, stable and transparent trading conditions.

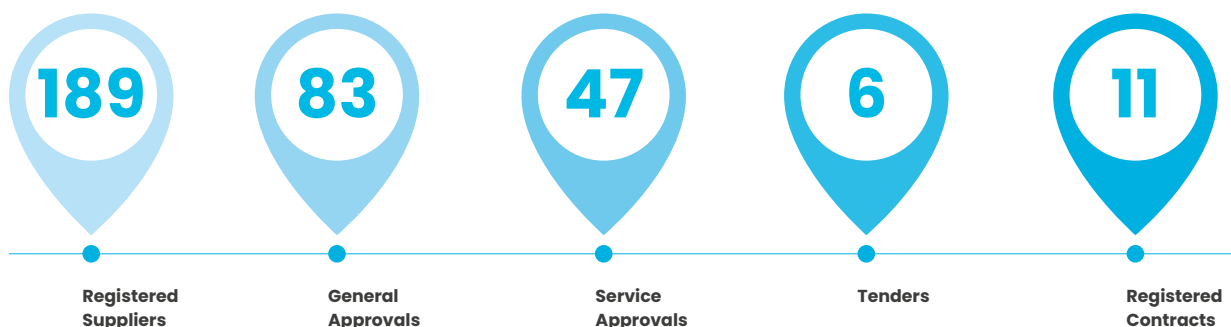
Cecabank implemented a supplier certification process for outsourced services, which it will gradually roll out across the entire supply chain. This certification process enables the Bank to ensure the application of all the principles listed above, measure the production, technical and financial capacity of the

supplier, check that it shares the ethical, social and environmental values of Cecabank before including them in our supply chain and be an instrument for reputational and operational risk management.

Following these principles of action, in 2019 a specific organisational unit was created and in 2020 has continued to manage purchases and contracts, called Purchasing Centre, and a Director has been appointed to manage and launch an electronic platform for suppliers and contracted services, with the following objectives:

- General contact with suppliers for their selection, reporting requirements, certification, uploading of electronic invoices, etc.
- Selection of suppliers by competitive bid and the generation of RFPs to provide transparency, uniformity, objectivity and to obtain a higher number of bidders.
- Support for previously certified suppliers based on the nature of each service to be provided and subsequent regular execution by requesting suppliers to update the necessary support documentation, all automatically and systematically.
- Maintenance of a record of outsourced activities.
- Maintenance of a log of suppliers in the purchasing platform.
- Regular review of prices and renegotiation of those prices.
- Maintenance of a log of metadata concerning contracts to manage their useful lives, monitor compliance with service levels and outsourcing requirements, and the preparation of automatic reports for the authorities.
- Preparation of statistics and reports.

The details of the activity processed on the supplier platform as at 31 December 2020 are set out below



05. Social Matters



One of the specific areas of action defined in the Sustainability Plan is that of implementing a social action policy which is in line with Bank's characteristics and corporate objectives, based on the commitment of Cecabank's employees and fostering their pride in belonging to the Company.

The lines of action of the Social Action Policy are described below:

- The **"You Choose" programme** which allows employees to submit social, environmental or cultural projects and Cecabank finances those chosen in a voting process open to all the employees.
- In 2020, in the form of remote work during confinement, the sixth Edition of the "Tú Eliges" (You Choose) programme was launched. Cecabank employees presented 21 projects (15 in the social category, 3 in the cultural category and 3 in the

environmental category) and after the voting period, in which 76.55% of the workforce participated, the 14 finalist projects were selected, which Cecabank supported with a grant of 97,000 euros.



TÚ ELIGES
acción social

The finalist projects within the “You Choose” projects are presented below:

Category	Beneficiary	Amount
Social	The Foundation Bobath	€ 15,000.00
Social	San Francisco Catholic Mission Association	€ 13,000.00
Social	IDEA LIBRE; Children, Development, Aid	€ 10,000.00
Social	Integra Foundation	€ 7,500.00
Social	Makwebo Association	€ 7,500.00
Social	Ahuce Foundation	€ 7,500.00
Social	San Isidro Foundation for Rugby Education and Inclusion	€ 7,500.00
Social	Organisation Sound Architects	€ 5,000.00
Cultural	EUTHERPE Foundation	€ 5,000.00
Social	DEBRA Butterfly Skin Association	€ 5,000.00
Social	Asociación de Vecinos La Fraternidad de los Cármenes (Neighbourhood Association La Fraternidad de los Cármenes)	€ 5,000.00
Environmental	BRINZAL	€ 3,000.00
Social	Association of people affected by achromatopsia and blue cone monochromatism (ACROMATES)	€ 3,000.00
Social	Association for the prevention, reintegration and care of prostituted women (APRAMP)	€ 3,000.00



Total assistance

97,000 €

In 2020, Cecabank received awards and distinctions from society, such as the Integra award, received from the Mayor of Madrid, as well as being a finalist in the Corral awards.

- **Humanitarian Emergencies**, whereby Cecabank launches a donation campaign to support those affected by humanitarian emergencies and matches employee contributions when donation campaigns are launched for humanitarian emergencies. As part of our Sustainability Plan, in 2018 we signed an agreement with the Spanish Emergency Committee.⁶ The 6 NGOs that form part of the Emergency Committee are (Acción contra el Hambre, UNHCR Spanish Committee, Médicos del Mundo, Oxfam Intermón, Plan International and World Vision). The main actions in humanitarian emergencies this year have been:
 - a. **Hurricanes in Central America:** December 2020, Cecabank responded to the international emergency call by urgently collaborating with the Emergency Committee and donating €3,000

to help the victims in Honduras, Guatemala and El Salvador to alleviate the serious consequences suffered by the populations of these countries following the recent hurricanes.

- b. **Red Cross “Responde COVID 19 campaign”:** in April 2020, the bank launched a campaign in support of the “Red Cross Responde COVID 19 campaign” in which Cecabank employees donated €33,566, which was matched by Cecabank with a further €33,566. The aid went directly to the Spanish Red Cross to support and care for people in Spain in a situation of vulnerability, seeking to respond to the needs of these people in terms of mainly health and social coverage.
- **Donations:** this year, 2020, we have been able to collaborate with the Sanders Foundation in the donation of 40 computers so that they can create spaces or computer classrooms to fight against the digital divide of the disadvantaged groups they serve, mainly young people at risk of exclusion.

a. **Operation Kilo for the Food Bank:** a through a website, Cecabank employees were able to make a solidarity purchase to help the most disadvantaged families in our community. This Cecabank solidarity project is aimed solely at the Madrid Food Bank and enables food to be distributed to the homeless, the elderly, children, the unemployed, etc. The Madrid Food Bank works with more than 550 charities in the Madrid region. Cecabank is no stranger to these needs and, through its alliance with the Madrid Food Bank, collaborates every year through this Christmas Operation Kilo. This year, 4,830 euros were collected from employees, the amount of which was doubled by the bank, bringing the final joint contribution to this campaign to 9,660 euros. This amount has been translated into more than 8,690 kilos of food distributed to the charities that need it most.

b. **Collaboration with Banco de Alimentos de Madrid:** since its inception, Cecabank has collaborated with this organisation by sponsoring the Cecabank Street at its headquarters in Colegio San Fernando and the Cecabank Avenue at its logistics centre. In 2020 and given our track record as a collaborating partner, Cecabank Street has been replaced by Cecabank Avenue and the Avenue has been converted into Cecabank Square with the consequent pride and satisfaction for our organisation for what this represents for both the Food Bank and for us. This year the collaboration of these sponsorships amounted to €11,500.

c. **Madre Coraje Clothes and Shoes Container:** In 2019 a container for the donation of clothes and shoes was placed at the bank's premises in the last quarter of the year. In 2020 and despite the pandemic, Cecabank employees have continued to collaborate and more than 500 kilos have been collected, far exceeding what was donated last year.

According to data from the NGO, this donated clothing has materialised in the shipment of food in Humanitarian Aid, impacting thousands of people.

d. **Computer classrooms sponsored by Cecabank:** in order to promote digitalisation, financial education and social inclusion, Cecabank, through its Sustainability and Stakeholder Relations department, sponsored the construction of two computer rooms in 2019 and 2020 and is in the process of building more rooms with the Sanders Foundation under an agreement with the Community of Madrid.

- The first computer room in the Royal Oratory of Caballero de Gracia is aimed at senior citizens, immigrants and the unemployed.
- The second computer classroom in the school of the Bobath Foundation, aimed at people with cerebral palsy to varying degrees, both children and adults.

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



Humanitarian Emergencies

- Hurricanes in Central America
- Red Cross "Responde COVID 19 campaign"



Donations

- Operation Kilo for the Food Bank
- Collaboration with Banco de Alimentos de Madrid
- Madre Coraje Clothes and Shoes Container
- Computer classrooms sponsored by Cecabank

06. Environmental issues






Cecabank’s environmental impact is limited compared to other industries because it operates primarily in offices.


It therefore does not have a specific policy for managing environmental matters. However, one of the lines of action defined in the Sustainability Plan is responsible and sustainable management of material resources, and specific initiatives are designed to be performed in this area such as, for example, the measurement of

its carbon footprint. Cecabank also has a strategic line of action within its 2017-2020 Strategic Plan based on the Efficiency Plan, with measures aimed at reducing consumption, such as the replacement of current lighting with LED bulbs and thermal insulation of buildings, among others.



An example of this is the fact that in 2018 Cecabank took a further step forward in energy management and implemented an Energy Management System in accordance with the UNE/ISO 50001 standard, obtaining AENOR certification (GE-2018/0038) on 14 December 2018 for its corporate buildings at Calle Alcalá, 27, and Calle Caballero de Gracia, 28-30, where it carries on its activities. Important activities have been performed within this system at the Company, such as:

-  The creation of a Bank Energy Policy.
-  Training and awareness-raising among all staff, through the Energy Use Good Practices guide.
-  Installation of consumption analysers to increase the number of indicators in the Corporate Management System (hereinafter referred to as SdGE).
-  Implementation of a SMARKIA IT tool to monitor consumption and document the entire Energy Management System



The changes in the main environmental indicators are as follows:

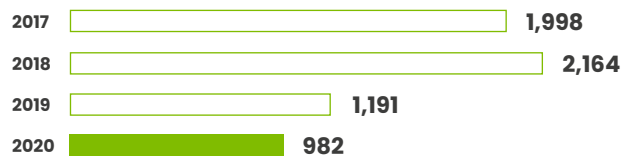
Energy

(electricity)¹ (GJ)



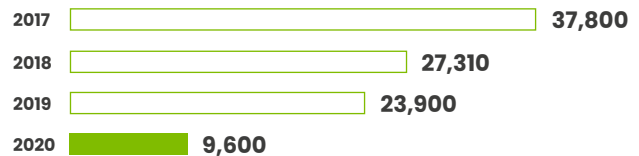
Energy

(natural gas)² (GJ)



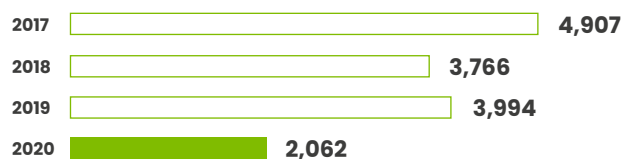
Paper

(Ecological- Ecolabel) (Kg)



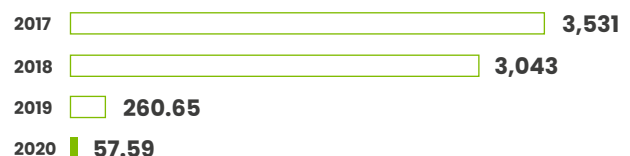
Water

(M³)



Carbon footprint

(TonCO₂)



1 The source for the conversion of the energy consumption of indirect emissions as a consequence of the Entity's electricity consumption is "Emission factors - Ministry for Ecological Transition".
 2 The source for the conversion of energy consumption of direct emissions from the Entity's natural gas consumption is "Emission factors - Ministry for Ecological Transition".

The 2019 carbon footprint certification, whose measures have been implemented in 2020, contemplated a significant reduction as a result of having obtained the certificate of Energy Supply with Certification of Origin (renewable) that applies to Cecabank's Data Processing Centres (DPC). Along the same lines, steps were also taken this year to ensure that the electricity supplies of the corporate buildings have energy certified at source, something that will be reflected in the Carbon Footprint certification for 2020. It also includes the planning and implementation of other measures and projects to contribute to a drastic reduction of the Carbon Footprint in the coming years. Regarding biodiversity protection, it is not considered material as Cecabank's activity is based on providing financial services and does not operate in protected areas.

In 2020, the reduction in electricity, gas and water consumption is largely identified by the situation experienced by COVID 19, which has led to the occupation of buildings being much lower than usual during the confinement and the last state of alarm approved by the Government. It should also be noted that the carbon footprint for 2019 has been recalculated given the use of the 2019 emission factors for the electricity mix of the retailers operating in Spain published by the Ministry for Ecological Transition for that year, as well as for the data corresponding to 2020.

The Bank is aware of our responsibility towards climate change and the importance of participating in the fight to reduce greenhouse gases. In this regard, Cecabank's objective is to know the impact it has on the environment. In 2020, the Footprint for 2019 was verified, and in 2019 Cecabank's Carbon Footprint for 2017 and 2018 was verified, obtaining the results shown in the table.

With regard to paper consumption, organisational efforts are made to reduce and rationalise the use of printing equipment, which has resulted in significant savings in printing toner and in the number of DinA4 packs consumed. This reduction has also been influenced by COVID 19 and its impact on the entire organisation.

The bank also tries to reduce its environmental impact through waste collection processes, differentiating between paper and cardboard, glass and hazardous waste, among others, which are collected by authorised external parties and taken to specialised plants. Cecabank generated the following waste in 2019 and 2020:

Waste generated by Cecabank, S.A.

	2020	2019
Paper and cardboard	43.75	8.94
Mixed	17.82	8.52
Batteries	0.15	0.11
Hazardous waste	1.01	3.01

Note 6: No data is reported for this indicator in 2018 due to the fact that this is the first year that Cecabank has made this measurement.

Total

2019

62.73

2020

20.54

In 2020, CPU equipment, servers, monitors, printers, racks and keyboards were removed from a warehouse owned by Cecabank. The reason for this was to free up space in the building and manage waste from broken and depreciated equipment, functional equipment that was replaced with new equipment and functional equipment that had fallen into disuse. Hence the increase in waste.

As far as food waste is concerned, it is considered non-material due to Cecabank's activity. Food and canteen waste are properly managed and is not relevant compared to the rest of the waste generated.

Lastly, mention should be made of the main international sustainability and environmental initiatives in which Cecabank is involved:



United Nations Global Compact (through the Spanish Global Compact Network): In 2020, in addition to the commitment to the Global Compact and its 10 principles, work has continued to disseminate the 17 United Nations Sustainable Development Goals, as well as pursuing a global compact to end the pandemic and promote sustainable economic recovery.



Cecabank joined the **"Business Leaders' Declaration for a Renewed Global Partnership"** at the invitation of Sanda Ojiambo, who in June 2020 was appointed by the UN Secretary-General as the new Executive Director of the Global Compact.



On the occasion of the United Nations Climate Change Conference (COP25), held in Madrid in December 2019, Cecabank, along with 95 per cent of the financial sector, presented its commitment to proceed within a specific timeframe to reduce the carbon footprint of its credit portfolios, in a way that can be measured with internationally approved criteria and in line with the objectives of the Paris Agreement, aligning itself with the **"Collective Commitment to Climate Action"** promoted by UNEP FI.



This summer 2020, Cecabank has joined **the Green Recovery Alliance**, an initiative promoted by Pascal Canfin, chairman of the European Parliament's Environment Committee, which seeks a global pact to put an end to the pandemic and promote sustainable economic recovery.

07. Human rights matters



With regard to Human Rights, given the nature and activity of Cecabank, and the countries in which it operates, no significant impact is generated in this area and no relevant risks are detected. The organisational structure and internal control mechanisms ensure that the Bank's activities are efficient and effective, that information is reliable, timely and complete, and that it complies with applicable laws.

In addition, Cecabank joined the Global Compact in February 2017 and in 2020 has continued to work towards the dissemination of its ten principles, based on human rights, labour, environmental and anti-corruption. Cecabank is also very aware of the United Nations' 17 SDGs and, through CECA, we support the UNEP FI's Principles for Responsible Banking.

This year, 2020, training pills were sent to all employees on the 10 Principles of the Global Compact and the Sustainable Development Goals, bringing sustainability closer to the entire company.



Pacto Mundial
Red Española

On the other hand, the Corporate Code of Conduct ensures compliance with and defence of Human Rights and makes the Corporate Conduct Channel available to employees to report any type of violation of the same. In 2020, no complaints regarding Human Rights or any other type were received through the channel or other means.

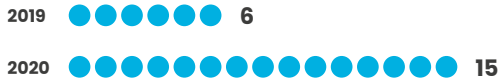
The Criminal Compliance Policy, which was approved by the entity's Board of Directors, and the reputational reports made to stakeholders also ensure compliance with legislation, due diligence and the non-violation of human rights.

08. Anti- corruption and anti- bribery information

Cecabank imposes ethical behavior requirements on itself in order to prevent criminal risk as far as possible for legal entities. To this end, it has various instruments in place to promote exemplary conduct as an entity:

- Criminal risk organisation and management system. The system has been certified by AENOR in accordance with the UNE 19601 Criminal Compliance Standard.
- The backbone document of the criminal risk organisation and management system.
- Corporate Code of Conduct, which formalises the commitment of all the professionals who provide their services in the Bank to the highest standards of integrity. The Code has a monitoring channel for complaints and enquiries. Complaints are treated confidentially.
- Money laundering and terrorist financing prevention procedures and control structure.
- Internal rules of conduct in the securities market area.
- Policies for the provision of investment services or MiFID policies. These policies encompass, inter alia, commercial policies (Marketing Manual), policies relating to the execution of customer orders (Best Order Execution Policy), policies relating to the safeguarding of customer assets (Asset Safeguarding Policy) and policies relating to the records that the Bank must necessarily keep in connection with the provision of investment services (Record Keeping Policy). The main objective of these policies is the proper compliance by the Bank with the rules of conduct and organisational requirements relating to the provision of investment services.

Actions (corrective, improvements, preventive) in progress arising from the Compliance system



Internal Audit recommendations regarding the system



The Bank has computer systems that enable it to analyse its own and intermediated operations in order to detect possible transactions linked to money laundering and the financing of terrorism. To this end, checks are carried out against lists of financial sanctions, and there are specific scenarios for detecting suspicious transactions. In addition, there are tools and processes that allow for an exhaustive knowledge of the customer and monitoring of the customer relationship.

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




Operations assessed for risks related to corruption

2019

12,480

2020

11,934



0

Confirmed incidents of corruption and actions taken

09. Tax and accounting information



CECA achieved a consolidated Profit Before Tax (taking into account Madrid, the representative offices in Frankfurt and Paris, the branches in London and Lisbon and the company in Belgium) in 2020 of EUR 55,748 thousand and EUR 40,224 thousand in 2019. The BAI for 2020 and 2019 broken down by country was:

	2020	2019
Spain	56,703	42,539
Belgium	23	-206
United Kingdom	-604	-1,665
Portugal	-374	-444

Regarding the amounts of taxes paid in 2020, they amount to EUR 4,490 thousand (EUR 138 thousand in 2019).

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



Profits

2019

62,851

2020

74,394



Taxes paid

2019

4,973

2020

10,247

Appendices



Appendix 1: Comparison of the number of employees by professional category in 2019 and 2020

	Level I		Level II		Level III		Level IV		Level V		Level VI		Level VII		Level VIII		Level IX		Level X		Level XI		Level XII		Level XIII		
	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	
Group 1																											
Male	3	3	5	5	18	16	30	30	32	32	63	64	31	26	26	30	9	8	8	7	1	3	1	1	-	1	
Female	-	-	3	4	9	8	17	15	26	25	56	55	44	42	54	55	16	20	7	7	4	4	4	-	2		
Group 2																											
Male	1	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-	-		
Female	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

Appendix 2: Comparison of training hours in 2019 and 2020

	Level I		Level II		Level III		Level IV		Level V		Level VI		Level VII		Level VIII		Level IX		Level X		Level XI		Level XII		Level XIII	
	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019
Group 1	106	106	403	900	941	1513	1839	2131	2329	3498	3322	4833	2754	2844	2082	3096	1436	1093	335	505	193	262	103	100	-	74
Group 2	5		21		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	88	-	-	-	-	-	-

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

The following table provide details regarding which section of this Non-Financial Information Statement responds to the requirements of Law 11/2018 and

identifies the reporting standard that has been used in this respect.

Content of Law 11/2018 NFIS	Chapter of the non-financial information statement presenting the information	Associated GRI Indicator
Business Model		
Strategic lines and business model	01A. Our business model	GRI 102-1
Organisation and structure	01B. Cecabank's Profile	GRI 102-2
Markets in which it operates	01B. Cecabank's Profile	GRI 102-3
Objectives and strategies	01B. Cecabank's Profile	GRI 102-4
	01C. Market environment and business strategy	GRI 102-6
Main factors and trends that may affect future development	01C. Market environment and business strategy	
Policies	Details are provided in each of the sections in this report, depending on the topic	GRI 103 – Management approach in each material matter
Main risks	Details are provided in each of the sections in this report, depending on the topic	GRI 102-15
Environmental Issues		
Global		
Effects of the organization's activities on the environment and health and safety, environmental evaluation or certification procedures	06. Environmental issues	GRI 102-15 GRI 102-29 GRI 102-30 GRI 102-31
Precautionary principle, the amount of provisions and guarantees for environmental risks	06. Environmental issues	GRI 102-11 GRI 103-2
Resources dedicated to preventing environmental risks	06. Environmental issues	GRI 102-29
Contaminación		
Measures to prevent, reduce or repair carbon emissions that seriously affect the environment; taking into account any specific atmospheric pollution from a business, including noise and light contamination	06. Environmental issues	GRI 103-2 GRI 301-1 GRI 302-1 GRI 302-4 GRI 302-5 GRI 305-5

Content of Law 11/2018 NFIS	Chapter of the non-financial information statement presenting the information	Associated GRI Indicator
Circular economy and waste prevention and management		
Circular economy, prevention measures, recycling, reuse, other forms of recovery and elimination of waste	06. Environmental issues	GRI 103-2 GRI 301-1 GRI 302-1 GRI 306-2
Actions to fight food waste	06. Environmental issues	Not material/GRI 103 - Food waste
Sustainable use of resources		
Water consumption and supply in accordance with local limitations	06. Environmental issues	GRI 303-1
Consumption of raw materials and the measures adopted to improve their efficient use	06. Environmental issues	GRI 103-2 GRI 301-1
Energy: Direct and indirect energy consumption, measures taken to improve energy efficiency and the use of renewable energies	06. Environmental issues	GRI 103-2 GRI 302-1 GRI 302-4
Climate change		
Greenhouse gas emissions	06. Environmental issues	GRI 305-1 GRI 305-2
Measures taken to adapt to the consequences of climate change	06. Environmental issues	GRI 305-5
Medium- and long-term voluntary targets to reduce greenhouse gas emissions and measures implemented to that end	06. Environmental issues	GRI 103-2
Protection of biodiversity		
Measures taken to preserve or restore biodiversity	06. Environmental issues	Not material/GRI 103 - Biodiversity
Impacts caused by activities or operations in protected areas	06. Environmental issues	
Social and employee information		
Employment		
Total number and distribution of employees by gender, age, country and professional Level	03A. Our employees	GRI 102-8
Total number and distribution of types of employment contracts	03A. Our employees	GRI 102-8
Annual average of indefinite contracts, temporary contracts and part-time contracts, by gender, age and professional Level	03A. Our employees	GRI 102-8
Number of dismissals by gender, age and professional Level	03A. Our employees	GRI 401-1
Average compensation and remuneration development broken down by gender, age and professional Level, or an equivalent value	03D. Remuneration 03E. Employee benefits	GRI 405-2

Content of Law 11/2018 NFIS	Chapter of the non-financial information statement presenting the information	Associated GRI Indicator
Salary Gap, remuneration for identical job positions or average positions at the company	03D. Remuneration	GRI 405-2
The average compensation for directors and executives, including variable compensation per diems, severance payments, payments into long-term retirement savings systems and any other amount broken down by gender	03D. Remuneration	GRI 102-35 GRI 102-36
Implementation of work disconnect policies	03F. Reconciliation	GRI 103-2 (employment)
Employees with disabilities	03B. Equality	GRI 405-1
Organisation of working time		
Organization of working time	03F. Reconciliation	GRI 103-2
Absenteeism in hours	03G. Prevention of Occupational Hazards	GRI 403-2
Measures intended to facilitate the reconciliation and encouragement of co-parenting responsibilities	03E. Employee benefits 03F. Reconciliation	GRI 103-2 GRI 401-3
Health and Safety		
Occupational health and safety conditions	03G. Prevention of Occupational Hazards	GRI 103-2 (health and safety)
Occupational accidents (frequency and seriousness) disaggregated by sex	03G. Prevention of Occupational Hazards	GRI 403-2
Occupational illnesses (frequency and seriousness) disaggregated by sex	03G. Prevention of Occupational Hazards	GRI 403-2
Labour relations		
Organization of social dialog, including procedures to inform and consult employees and to negotiate with them	03G. Prevention of Occupational Hazards	GRI 103-2 (employee-employer relations) GRI 102-43 GRI 403-1
Percentage of employees covered by collective bargaining by country	03G. Prevention of Occupational Hazards	GRI 102-41
Balance of collective bargaining agreements, particularly in the area of Occupational Health and Safety	03G. Prevention of Occupational Hazards	GRI 403-1
Training		
Training policies implemented	03C. Training	GRI 103-2 (training and education)
Total number of training hours by professional Level	03C. Training	GRI 404-1
Universal accessibility of disabled persons	03C. Training	GRI 103-2 (Diversity and equal opportunities / non-discrimination)

Content of Law 11/2018 NFIS	Chapter of the non-financial information statement presenting the information	Associated GRI Indicator
Equality		
Measures adopted to promote equal treatment and opportunities for men and women	03B. Equality	GRI 103-2 (Diversity and equal opportunities)
Equality plans, measures adopted to promote employment, protocols to fight against sexual harassment and gender discrimination, the integration and universal accessibility of disabled persons	03B. Equality	GRI 103-2 (Diversity and equal opportunities / non- discrimination)
Non-discrimination policy and any diversity management	03A. Our employees 03B. Equality	GRI 103-2 (Diversity and equal opportunities / non- discrimination)
Human rights		
Application of due diligence procedures in human rights matters	07. Human rights matters	GRI 103-2 (human rights assessment)
Prevention of human rights violation risks and measures to mitigate, manage and repair any abuses	07. Human rights matters	GRI 103-2 (human rights assessment)
Reports of human rights violations	07. Human rights matters	GRI 102-16 GRI 102-17 GRI 406-1
Promotion and compliance with the provisions of the fundamental Conventions of the International Labour Organization related to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour	07. Human rights matters	GRI 103-2 (non-discrimination; freedom of association and collective bargaining; child labour; forced or compulsory labour and human rights)
Corruption and bribery		
Measures adopted to prevent corruption and bribery	08. Anti-corruption and anti-bribery information	GRI 103-2 (anti-corruption) GRI 205-1 GRI 205-3
Measures to fight against money laundering	08. Anti-corruption and anti-bribery information	GRI 103-2 (anti-corruption)
Contributions to foundations and non- profit organizations	05. Social matters	GRI 103-2 (anti-corruption) GRI 413-1
Company		
The company's commitment to sustainable development		
Impact of the organization's activities on employment and local development, local populations and territories	05. Social matters	GRI 413-1
Relationships and types of dialog with members of local communities	05. Social matters	GRI 102-43 GRI 413-1
Association or sponsorship actions	05. Social matters	GRI 102-13

Content of Law 11/2018 NFIS	Chapter of the non-financial information statement presenting the information	Associated GRI Indicator
Subcontracting and suppliers		
The inclusion in the purchasing policy of social, gender equality and environmental issues	04. Our suppliers	GRI 103-3 (supplier environmental and social assessment)
Consideration of social and environmental responsibility in relationships with suppliers and subcontractors	04. Our suppliers	GRI 102-9
Supervision and audit systems and their results	04. Our suppliers	GRI 308-1 GRI 414-2
Consumers		
Measures for consumer health and safety	02. Our customers	GRI 103-2 (customer health and safety)
Claims systems, complaints received and their resolution	02. Our customers	GRI 103-2 (customer health and safety)
Tax information		
Profit/loss by country	09. Tax and accounting information	103.- Financial performance GRI 201-1
Corporate income tax paid	09. Tax and accounting information	GRI 201-1
Official subsidies received	09. Tax and accounting information	GRI 201-4

cecabank