

Sustainability Policy

Corporate Policy

Public information



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1. Introduction and objectives

Unicaja aims to consolidate its position as a sustainable entity at national level, building on its leadership in its core territories. To this end, the Entity shall integrate environmental, social and governance (ESG) criteria into its strategy and business model, with a view to maximising positive impacts and mitigating adverse effects.

Through this Sustainability Policy, and in line with the recommendations of the CNMV Code of Good Governance, Unicaja defines its strategic positioning and establishes its general objectives in ESG matters, guiding business management, financial activity, and the design and distribution of products and services.

This Policy reflects Unicaja's commitment to the main international frameworks and standards, including the Paris Agreement, the United Nations Global Compact, the 2030 Agenda and the Sustainable Development Goals (SDGs), as well as the Principles for Responsible Banking. The Entity shall ensure alignment with these frameworks in accordance with its strategic positioning and voluntary commitments.

2. Policy Governance

The Board of Directors will be responsible for approving and amending this Policy, as well as supervising it.

The Policy will be subject to a biennial review, at least, to provide an adequate response to the new recommendations of the supervisors, to the legal requirements that may be approved and to Unicaja's own strategic positioning.

The proposals for approval and modification will be submitted with the report of the Sustainability Committee.

3. Scope of application

This policy is corporate in nature and is applicable to Unicaja (hereinafter, "Unicaja" or "the Entity" or "the Bank") and to the subsidiaries of the Unicaja Group. In this regard, in accordance with the provisions of the 'Procedure for the transfer of Corporate policies to Group companies', the ESG Strategy Department, in its capacity as the Management responsible for the Policy and in collaboration with the Investee Division, will determine the Group Companies to which this Policy is applicable, coordinating with the aforementioned Management the process of transfer and interaction with the affected Group companies and the transfer to them of the actions to be carried out for the implementation of the Policy, if applicable.

The policy applies to all staff (permanent and temporary). All staff must be aware of and are required to know and comply with this policy and its action plans and associated activities.

4. Unicaja's purpose and values

Unicaja's purpose, understood as the reason why the company exists and the highest aspiration in relation to its role in the world, is **"To help people prosper"**.

Thriving at Unicaja means:

- To understand and accompany our customers and employees and to see how Unicaja can help.
- To be their guide on their path to prosperity, helping them grow every day.
- Understanding people in a deep way and making a difference.
- Realize your potential.

To do this, the following values are taken into account:



People: it means focusing on each customer and employee; we want to be close and help.



Professionalism: refers to the daily effort to uncover our potential and, thus, meet the needs of customers.



Team: Collaborate as a team by recognizing and enhancing the power of togetherness.



Evolution: acting in a solid way in each step taken by the Entity to evolve sensibly and responsibly.

The Group's mission, on the other hand, is to promote the economic and social development of its area of activity, with full respect for the environment, taking into account the needs and expectations of the different stakeholders.

5. Unicaja's sustainability objectives

Unicaja's main objectives in the field of sustainability are the following:

- **Collaborating in the transition to a more sustainable economy (financing the transition):** Unicaja is committed to financing ecological and sustainable projects, accompanying its customers on their own transition paths towards climate neutrality.
- **Integration of the dual materiality approach:** identifying, evaluating and managing the significant impacts of Unicaja's activity on the environment and society, as well as the risks and opportunities that ESG factors pose for the Entity.
- **Integration of ESG and climate risks in management and decision-making,** including the analysis of physical, transition and social risks in financial and investment activity.
- **Extension of sustainability criteria to the value chain,** promoting responsible practices in suppliers, intermediaries and relevant counterparties.
- **Carbon footprint reduction:** Unicaja will measure and reduce its carbon footprint,

implementing more sustainable practices in its financial operations and promoting energy efficiency in general, with the aim of reaching climate neutrality by 2050 at the latest.

- **Promotion of positive social impact and social inclusion:** efforts will be made to leave no one behind, especially vulnerable groups (the elderly or disabled, inhabitants of rural areas, people affected by the digital divide, young people and the business community).

Unicaja will take into consideration the social development of the communities and territories in which it operates, both through its own financial activity and by supporting initiatives aimed at social investment.

- **Financial inclusion:** work will be done to improve access to financial services for all segments of society, especially those in vulnerable situations. It will facilitate access to financial services offered through the various physical and digital channels on equal terms, ensuring non-discrimination.
- **Financial education:** The Entity will strive to promote financial education among its customers and the community in general, helping them to make informed, responsible and sustainable economic and financial decisions.
- **Responsible transparency and governance:** Unicaja will establish commercial and good governance practices, ensuring that its decisions are aligned with the principles of sustainability and social responsibility, on the one hand, and independence, and diversity, on the other.

In terms of business policies and practices, Unicaja will take into account environmental and social impacts in the design of products and services, as well as in relation to its pricing policies, favouring those that generate added environmental or social value.

Good governance will also be promoted, as well as the best practices of good corporate and internal governance.

6. General principles

Unicaja's sustainability strategy, in accordance with the values indicated above, will be developed in accordance with the application of the following general principles:

- **Relationship with stakeholders:** Unicaja's strategy will be based on establishing a balanced, transparent and clear relationship with stakeholders, particularly with customers, taking into account their ESG concerns.
- **People management:** Unicaja will promote the management of staff members, promoting their well-being and motivation through work-life balance, personal and professional development, health and safety measures, promoting the inclusion and diversity of the human team.
- **Relationship with suppliers:** Unicaja will promote the responsible and sustainable management of the supply chain, and other relevant members of the value chain, promoting a positive mutual influence to improve the ethical, social and environmental performance of its suppliers.

- **Respect for the environment:** Unicaja's strategy will make it possible to face the global challenge posed by climate change, involving its main stakeholders in the establishment of policies and procedures focused on its adaptation and mitigation in the areas of business and risk management, in particular, through the assumption of international protocols and standards. implementing their best practices.
- **Incorporation of ESG criteria in risk policies:** Unicaja will integrate environmental, social and governance criteria in investment and financing analysis, as well as in strategic decision-making, credit investment, financing, product design and investment or insurance advice. To this end:
 - The integration of environmental, climate and governance risks into Unicaja's strategic and business processes will be promoted, favouring the financing of projects that contribute to the improvement of society and the environment.
 - The integration of risks related to the corporate governance of companies and institutions in the analysis and decision-making processes related to credit risk management, as well as in the financing of investment projects and asset management, will be encouraged.
- **Coherence:** internal coherence in the management of ESG factors governs Unicaja's actions in order to provide an adequate response to compliance with the commitments signed, the applicable regulations and supervisory expectations.
- **Transparency:** Unicaja will observe the principle of transparency in the definition, disclosure and application of strategies, policies and procedures relating to the integration of sustainability factors into corporate strategy.
- **Proportionality:** Unicaja will develop the management of ESG factors in the field of business and related risks in accordance with a line of action based on proportionality, defined based on the nature of the Entity's main activity, the relevance of the assets and counterparties assessed, the limitations related to the availability and quality of data, and the complexity of the modifications or adaptations to be made to its infrastructure and its policies and procedures.
- **Double materiality:** Unicaja will systematically apply the principle of double materiality, considering both the impacts of its activity on the environment and society and the risks and opportunities that ESG factors pose for the Entity.

7. Specific commitments to stakeholders in the field of sustainability

Within the framework of this Policy, Unicaja assumes the following specific commitments, which will be applied on an ongoing basis and in relation to its main stakeholders:

a) Human rights and the 2030 Agenda

Unicaja is committed to respecting and promoting human rights in the development of its relationships with employees, customers, shareholders and investors, suppliers and society as a whole, in accordance with the International Bill of Human Rights, the United Nations Global Compact,

the 2030 Agenda and the principles promoted by the United Nations, the OECD and the ILO.

It will also promote its own and collaborative initiatives, through strategic alliances, aimed at achieving the Sustainable Development Goals (SDGs).

b) Customers

Unicaja is committed to offering clear, truthful and transparent information about its financial products and services throughout their life cycle, developing responsible commercial communication that respects consumer rights and free competition.

It will also provide a professional, personalised and quality service, through a wide portfolio of products, services and channels – including digital – guaranteeing regulatory compliance, information security, protection of personal data and continuous improvement of customer experience and satisfaction.

c) Employees

Unicaja will apply labour standards in accordance with the most advanced international standards, promoting equal treatment, diversity, non-discrimination and a safe, healthy and sustainable work environment.

The Entity will promote professional development, training, work-life balance and permanent dialogue with the workforce and their representatives, with the aim of attracting and retaining talent and promoting teamwork.

(d) Diversity and inclusion

Unicaja will develop people management based on equal opportunities, non-discrimination and the appreciation of the diversity of professional profiles, convinced that this contributes to better decision-making and the generation of sustainable value.

e) Corporate and internal governance

Unicaja will promote good corporate and internal governance practices based on transparency, integrity and trust, ensuring that the selection processes of the governing and support bodies favour diversity, gender balance and the absence of bias.

f) Shareholders and investors

The Entity will guarantee fair, transparent and non-discriminatory treatment to all shareholders and investors, ensuring strict compliance with market abuse regulations and the adequate dissemination of relevant and up-to-date information.

g) Social commitment

Unicaja will contribute to the economic, social and environmental development of the territories in which it operates, supporting local communities, the agricultural sector and rural areas, and promoting social, digital and financial inclusion.

It will also promote financial education initiatives, support for social housing, care for vulnerable groups and financing of business and social economy projects.

(h) Environment

Unicaja will define and deploy actions aimed at the Entity's internal environmental management, environmental protection, the fight against climate change, energy efficiency and performance and the reduction of the environmental impact derived from its activity, through the control of its operations, facilities and consumption. This will be complemented by the promotion of sustainable project financing and the integration of environmental and climate risks into risk analysis and management.

(i) Suppliers

Unicaja will apply transparent, objective and non-discriminatory recruitment processes, promoting a responsible value chain, ensuring respect for labour and environmental legislation, human rights and ethical criteria, as well as compliance with contractual conditions and payment deadlines.

(j) Fiscal responsibility

The Entity will integrate fiscal responsibility into its sustainability strategy, managing tax matters in accordance with the principles of integrity, transparency and prudence, cooperating with the Tax Administration and contributing to the development of the territories in which it operates by complying with its tax obligations.

(k) Prevention of corruption and unlawful conduct

Unicaja will maintain a solid culture of regulatory compliance, based on ethics, transparency and zero tolerance for corruption, fraud and any illegal conduct, making a Whistleblowing Channel available to employees and third parties and expressly condemning any action contrary to the law.

8. Communication channels, participation and dialogue

Unicaja has formal mechanisms for relating to all its stakeholders, providing them with permanent, accessible and two-way channels of communication and dialogue, which facilitate their participation and guarantee an adequate treatment of their concerns and expectations.

Unicaja also promotes transparency in the dissemination of information to its stakeholders, applying clear, truthful, responsible and understandable communication practices, in coherence with the principles of good governance, accountability and sustainability.

9. Roles and responsibilities

The roles and responsibilities associated with this Policy, within the more general framework of the functions in force at Unicaja, are as follows:

General Directorate of Strategy and Office of the CEO: Through the Strategy and Sustainability Department, it is responsible for ensuring the proper integration of ESG principles and commitments into Unicaja's corporate strategy, ensuring consistency between this Policy and the rest of the corporate policies.

ESG Strategy Division: The ESG Strategy Division, part of the Strategy and Sustainability Division,

will be responsible for the day-to-day monitoring of this Policy and for coordinating its correct implementation throughout the organisation. In particular, it will be responsible for:

Propose updates or revisions to the Policy when necessary, after submitting it to the Management Committee.

To promote the definition of sustainability objectives consistent with the Group's strategy.

Coordinate the monitoring of sustainability indicators.

Areas and divisions with operational responsibilities: The different divisions and functional areas of Unicaja, within the scope of their respective competences, will be responsible for the effective application of this Policy and the procedures derived from it, integrating ESG criteria into their operational, contracting, management and decision-making processes.

All staff: All Unicaja staff, regardless of their role or level of responsibility, must be aware of and comply with the provisions of this Policy, as well as actively collaborate in improving the Entity's ESG performance, in accordance with the principles of responsibility and continuous improvement.

The implication of the control functions is explained in the "Control mechanisms" section of this Policy.

10. Reports

Unicaja's Governing and Management Bodies will receive timely, sufficient and appropriate information on the repercussions and impacts of sustainability factors on the Entity's strategic processes, in particular in the areas of business and risk management.

The specification of the reports, issues and dashboards that support this reporting model will be established in the specific policies that regulate the integration of sustainability factors in the management of the different risks to which the Entity is exposed (among others, credit, liquidity, market and operational risk).

These policies will determine, in particular, the content and periodicity of the reports and dashboards, the applicable metrics, those responsible for their preparation, review and, where appropriate, validation, as well as the recipients and communication channels for their dissemination.

11. Control mechanisms

Unicaja will structure the management of sustainability factors and associated risks in accordance with the methodology of the three lines of defence.

The first line of defence shall be responsible for the operational implementation of this Policy within the scope of their respective functions and activities.

The second line of defence, integrated into the Directorate General for Risk Control and Relations with Supervisors (CRO), in which the Directorate of Regulatory Compliance is framed, will be responsible for supervising the proper implementation and compliance with the measures provided for in this Policy.

The third line of defence, corresponding to the Directorate-General for Internal Audit, will independently

supervise the proper implementation of the Policy.

Each of the three lines of defence shall establish or adapt the internal procedures necessary for the proper performance of its functions.

12. Entry into force and publicity

This Policy, the revision of which will enter into force on the day following its approval by the Board of Directors, will be published without delay in the corporate repository to generate knowledge of its recipients.

In addition, it will be published on the corporate website.

13. Control Version

Version	Changes compared to previous version	Responsible unit	Approving body	Approval date
1	Initial approval	Sustainability and CSR	Board of Directors	29/01/2021
2	Review for its adaptation to certain regulatory and supervisory standards. Periodic review.	ESG Business Policy	Board of Directors	28/07/2023
3	Integration of the "Corporate Social Responsibility Policy" and the "Corporate Sustainability Policy" in a single document. Periodic review.	ESG Strategy Department	Board of Directors	26/04/2024
4	Periodic review.	ESG Strategy Department	Board of Directors	28/05/2026