

# Environmental, Energy & Climate Change

Corporate Policy

Public information



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## 1. Introduction

Climate change and the increasing scarcity of natural resources represent key challenges for society and are subject to growing regulatory and supervisory attention.

Unicaja and its Group entities generate direct and indirect environmental impacts arising from their banking and financial activities. In this context, the Entity adopts this Environmental, Energy and Climate Change Policy (the “Policy”), reflecting its commitment to sustainable development, the reduction of environmental impacts, and the improvement of energy performance, as well as to awareness-raising and training in these areas.

Unicaja shall integrate physical and transition risks related to climate change into its management framework, in line with the principle of double materiality. The Entity shall align its approach with the Ten Principles of the United Nations Global Compact, the Sustainable Development Goals (SDGs), the Paris Agreement, the Principles for Responsible Banking and the Carbon Disclosure Project (CDP).

## 2. Objective

This Policy, together with the Sustainability Policy and other applicable corporate policies, establishes the fundamental principles governing action in the areas of environmental protection, energy efficiency and climate change. It aims to reduce Unicaja’s environmental footprint and to contribute to environmental protection, biodiversity conservation and climate change mitigation, in line with the environmental objectives set out in Regulation (EU) 2020/852 (EU Taxonomy).

## 3. Policy Governance

The Board of Directors shall approve, amend and oversee this Policy.

The Policy shall be reviewed at least every two years to ensure alignment with supervisory expectations, regulatory requirements and Unicaja’s strategic positioning.

Proposals for approval or amendment shall be supported by a report issued by the Sustainability Committee.

The ESG Strategy Division shall be responsible for the ongoing monitoring of the Policy and for proposing amendments, reporting through the Strategy and Sustainability Division within the General Directorate of Strategy and the Office of the Chief Executive Officer.

## 4. Scope of application

This Policy is corporate in nature and applies to Unicaja (the “Entity”) and its subsidiaries. In accordance with the Procedure for the Transfer of Corporate Policies to Group Companies, the ESG Strategy Department shall determine the scope of application and ensure appropriate implementation across the Group, in coordination with the relevant units. This Policy shall apply to all employees, whether permanent or temporary. Employees shall be required to be aware of, understand and comply with this Policy and its related action plans.

## 5. General Principles

Unicaja, aware of the need to reconcile economic development with environmental protection, the fight against climate change and efficiency in the use of energy and resources, will permanently promote those initiatives and actions aimed at these objectives.

In relation to the environmental and energy impacts derived from its activity, and as a specification of its environmental commitment and to climate change, Unicaja will act in accordance with the following general principles:

- **Continuous improvement of environmental and energy performance**, through the implementation and maintenance of management systems aligned with recognized international standards, promoting sustainable and efficient practices that avoid or minimize the pollution generated by the Entity's activity.
- **Prevention and control of environmental impacts**, promoting the proper management of emissions, waste and consumption, as well as the efficient and responsible use of natural and energy resources.
- **Diligent management of environmental and energy incidents**, acting quickly and responsibly in the event of any event that may pose a risk to the environment or energy use, and informing, where appropriate, the competent authorities and affected parties.
- **Compliance with regulations and voluntary commitments**, guaranteeing compliance with applicable environmental and energy legislation, as well as with the national and international commitments voluntarily assumed by Unicaja in terms of sustainability and the environment.
- **Involvement and awareness of stakeholders**, including staff and management, promoting a corporate culture aimed at protecting the environment, energy efficiency and improving environmental performance.
- **Training and training**, providing staff and Management, in accordance with their level of responsibility, with the necessary knowledge for the correct implementation, monitoring and improvement of good environmental and energy efficiency practices.
- **Promotion of the circular economy**, promoting the reuse and recycling of materials, the acquisition of energy-efficient products and services, the use of cleaner technologies and eco-design criteria aimed at improving environmental and energy performance.
- **External collaboration**, cooperating with customers, suppliers, Public Administrations and society in general in environmental protection, energy efficiency and climate change prevention, mitigation and adaptation initiatives.
- **Integration of environmental and energy criteria in procurement**, incorporating these criteria in the processes of awarding and monitoring of contracts for the provision of services, as well as in the relationship with suppliers, promoting good practices aligned with the Principles of the United Nations Global Compact.

- **Planning, objectives and verification, establishing environmental and energy programs, objectives and goals**, ensuring the availability of necessary resources and carrying out internal audits and periodic evaluations of compliance with this Policy, with the corresponding issuance of monitoring reports.
- **Transparency and accountability**, making the Policy available to stakeholders and transparently reporting, at least through the corporate sustainability report, on management, controls and results in terms of environment, climate change and energy performance.

## 6. Roles and responsibilities

The roles and responsibilities arising from this Policy shall be exercised in accordance with Unicaja's internal regulations, organisational rules, functional manuals, and other applicable corporate policies and procedures.

### **Board of Directors**

The Board of Directors shall approve and amend this Policy and shall oversee its effective implementation and compliance. It shall ensure alignment with Unicaja's corporate strategy, its sustainability commitments, and applicable regulatory and supervisory requirements.

### **Sustainability Committee**

The Sustainability Committee shall support the Board of Directors in its oversight function. It shall assess the degree of implementation and effectiveness of the Policy, review the main environmental, energy and climate-related risks, and issue reports on proposed amendments or revisions.

### **General Directorate of Strategy and Office of the CEO**

The General Directorate of Strategy and the Office of the Chief Executive Officer shall ensure the integration of the principles and commitments set out in this Policy into the corporate strategy. They shall ensure consistency with the Sustainability Policy and other applicable corporate policies.

### **ESG Strategy Management**

The ESG Strategy Division shall be responsible for the ongoing monitoring and coordination of the implementation of this Policy across the organisation. It shall propose objectives, monitor key performance indicators, including the carbon footprint, and ensure alignment with relevant international standards and frameworks.

### **Areas and Divisions with operational responsibilities**

The relevant areas and functional divisions shall implement this Policy within the scope of their respective responsibilities. They shall integrate environmental, energy and climate change considerations into their operational processes, procurement activities and decision-making processes.

### **Control Functions**

The Regulatory Compliance Directorate shall oversee compliance with applicable environmental and energy regulations, as well as with voluntarily assumed commitments.

The Directorate General for Risk Control and Supervisory Relations, acting as the second line of defence, shall oversee the integration of environmental and climate-related risks into the non-financial risk management framework.

The Directorate General for Internal Audit, acting as the third line of defence, shall independently assess the effective implementation of this Policy.

### **The entire workforce**

All employees shall be aware of, and comply with, the provisions of this Policy. They shall contribute to the continuous improvement of the Entity's environmental and energy performance, in line with the principles of responsibility and continuous improvement.

## **7. Commitments, objectives and strategy**

Unicaja will develop and promote activities that respect the environment, promoting the prevention of pollution, the conservation of biodiversity, energy efficiency, the responsible use of resources and adequate management of climate change, with the participation of all levels of the organisation.

The Entity will periodically carry out materiality analyses to identify the most relevant environmental aspects for its stakeholders, considering, among others, climate change, the sustainable use of resources, the circular economy and the impact of environmental and social criteria on the business, as well as the performance and energy efficiency of its facilities.

Unicaja's environmental commitment is structured around three axes:

- the integration of environmental and energy issues into the business model,
- the development of environmental management and energy efficiency actions,
- the promotion of a culture of environmental and energy responsibility.

Within this framework, Unicaja promotes management systems based on international standards (ISO 14001 and ISO 50001 Standards), aimed at continuous improvement, the reduction of environmental and energy impacts and the measurement and management of its carbon footprint in accordance with the GHG Protocol standard, promoting its certification by third parties and its registration in the competent public registries.

Likewise, objectives for the reduction of greenhouse gas emissions will be established, promoting actions for mitigation, reduction and, where appropriate, compensation of emissions, as well as the financing of projects that favour energy efficiency and environmental sustainability, integrating environmental and social risks in the analysis of investment decisions.

Finally, Unicaja will foster a responsible attitude among its staff, suppliers and society in general, promoting good environmental practices and incorporating environmental criteria and clauses in the processes of contracting and evaluating suppliers, inspired by international standards and frameworks of reference, such as:

- The Universal Declaration of Human Rights.
- The Paris Agreement on Climate Change.
- The United Nations Global Compact.

- The United Nations 2030 Agenda and the SDGs.
- The Principles of Responsible Banking.
- Directive 2022/2464 of 14 December 2022 on corporate sustainability reporting (CSRD).
- The *European Sustainability Reporting Standards* (ESRS) or European Sustainability Reporting Standards (NEIS) in Spanish.
- The recommendations of the *Task Force on Climate-related Financial Disclosures* (TCFD) of the *Task Force on Nature-related Financial Disclosures* (TNFD).
- The European Commission's 2018 Action Plan for Financing Sustainable Development, revised in 2021.
- The energy saving and efficiency strategies issued by the competent authorities.

## 8. Control mechanisms

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

The first line of defence will be responsible for the operational implementation of this Policy.

The second line of defence, integrated into the Directorate General for Risk Control and Relations with Supervisors (CRO), through the Directorate of Regulatory Compliance, will supervise the correct implementation of the planned measures.

The third line of defence, corresponding to the General Directorate of Internal Audit, will supervise the proper application of the Policy.

Each line of defence shall establish or adapt the internal procedures necessary for the exercise of its functions.

## 9. Entry into force and publicity

This Policy, 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 for the knowledge of its recipients.

## 10. Monitoring and dissemination

The monitoring of this Policy and the annual progress of Unicaja's sustainability strategy will be available in the sustainability information published on the corporate website.

The Policy will also be available in an internal document repository, accessible to all staff, in order to guarantee an orderly and up-to-date consultation of the regulations in force. In addition, Unicaja will disseminate the Policy through its corporate website, so that it can be known by stakeholders and applied in its relations with the Entity.

## 11. Version Control

Version	Changes compared to previous version	Responsible unit	Approving body	Approval date
1	Approval	Institutional Relations and Stakeholder Directorate	Board of Directors	29/01/2021
2	Periodic review	Sustainability and CSR	Board of Directors	27/01/2023
3	Periodic review	ESG Strategy Department	Board of Directors	26/04/2024
4	Periodic review	ESG Strategy Department	Board of Directors	28/05/2026